State of Montana
Department of Environmental Quality
Helena, Montana 59620

AIR QUALITY OPERATING PERMIT NUMBER OP2589-03

Administrative Amendment Application Received: **October 1, 2004**
Application Deemed Administratively Complete: **October 1, 2004**
Application Deemed Technically Complete: **October 1, 2004**
AFS Number: **030-063-0006A**

Date of Decision: **October 7, 2004**
Effective Date: **November 9, 2004**
Expiration Date: **December 11, 2006**

In accordance with the Montana Code Annotated sections 75-2-217 and 218, and the Administrative Rules of Montana (ARM) Title 17, Chapter 8, Subchapter 12, Operating Permit Program, ARM 17.8.1201, *et seq*.,

Smurfit-Stone Container Enterprises, Inc.
NW¼ of Section 24, Township 14 North, Range 21 West in Missoula County
P.O. Box 4707
14377 Pulp Mill Road
Missoula, Montana 59806-4707

hereinafter referred to as "Smurfit-Stone," is authorized to operate a stationary source of air contaminants consisting of the emission units described in this permit. Until this permit expires or is modified or revoked, Smurfit-Stone is allowed to discharge air pollutants in accordance with the conditions of this permit. All conditions in this permit are federally and state enforceable unless otherwise specified. Requirements which are state-only enforceable are identified as such in the permit. A copy of this permit must be kept on site at the above-named facility.

Issued by the Department of Environmental Quality

_____ _____
Signature Date

Permit Issuance and Appeal Process: In accordance with ARM 17.8.1210(j), the Department of Environmental Quality's (Department) decision regarding issuance of an operating permit is not effective until 30 days have elapsed from the date of the decision issued October 7, 2004. The decision may be appealed to the Board of Environmental Review by filing a request for a hearing within 30 days after the date of decision. If no appealed is filed then the Department will send notification and a final permit cover page to be attached to this document stating that the permit is final. Questions regarding the final issuance date and status of appeals should be directed to the Department at (406) 444-3490.

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Terms not otherwise defined in this permit or in the Definitions and Abbreviations Appendix of this permit have the meaning assigned to them in the referenced regulations.

SECTION I. GENERAL INFORMATION

The following general information is provided pursuant to ARM 17.8.1210(1).

Company Name: Smurfit-Stone Container Enterprises, Inc.

Mailing Address: P.O. Box 4707

City: Missoula State: MT Zip: 59806-4707

Plant Location: 14377 Pulp Mill Road, Section 24, Township 14 North, Range 21 West, Missoula County, Missoula, MT

Responsible Official: Robert C. Boschee Phone: (406) 626-4451
Alternate Responsible Official: William Kohl Phone: (406) 626-4451

Facility Contact Person: Jeff Briggs Phone: (406) 626-4451

Primary SIC Code: 2631

Nature of Business: Production of linerBoard used to make corrugated boxes.

Description of Process: Smurfit-Stone's Missoula mill is located close to Frenchtown, which is 10 miles northwest of Missoula. The mill produces unbleached linerBoard products from a combination of sawmill residuals (sawdust and chips), roundwood, and recycled fiber. Pulp is produced in batch and continuous pulping digesters using the Kraft (sulfate) cooking process. Recycled fiber is also recovered from post-consumer paper sources on the recycling fiber line. Other major processes include raw materials handling, steam and energy production, chemical recovery, paper production, and finished product handling and shipping. The mill has environmental control systems for air emissions and mill effluent.

The mill is divided in this permit, into five major processes: 1) the Pulp, Chip Dock, and Recycled Fiber Department, 2) the Paper Mill Department, 3) the Power, Recovery and Recausticizing Department, 4) the Environmental and Technical Department, and 5) the Engineering and Maintenance Department.

The mill's daily limits are defined by a mill day running from 5:00 am to 5:00 am.

SECTION II. SUMMARY OF EMISSION UNITS

The emission units regulated by this permit are the following (ARM 17.8.1211):

Emission Unit ID	Description	Pollution Control Device/Practice
	PULP CHIP DOCK AND RECYCLED FIBER DEPARTMENT	
EU004	**Sawdust Handling**	Covered conveyors & limited drop heights
EU004a	Sawdust Fines to Hog Fuel (& chip screening fines)	
EU004b	Sawdust Receipts	
EU005	**Chip Handling**	Covered conveyors
EU005a	Chip Production	
EU005b	Chip Receipts	
EU005c	Chip Fines to Hog Fuel (& sawdust fines)	
EU026	**Washing**	
	Base Stock Brownstock Washing	Wet Scrubber
EU026a	No. 3 Base Stock Washer Feed Tank	
EU026b	Base Stock Washer Walkway Exhaust	
EU026c	No. 1 Base Stock Filtrate Tank	
EU026d	No. 2 Base Stock Filtrate Tank	
EU026e	Spill Collection Tank – Base Washers	
	CB Washing	Enclosed System
EU026f	CB Washer Filtrate Tank	
EU026g	CB Washers (M&D System)	
EU026h	M&D Foam Tower	
	PC Washing	Wet Scrubber
EU026i	Foam Tank Vents	
EU026j	Intermediate Foam Tower	
EU026k	PC Washer Vent	
EU026l	PC Washer Stack I	
EU026m	PC Washer Stack I	
	Top Stock Washing	Wet Scrubber
EU026n	Base Stock Reject Tank	
EU026o	Top Stock Foam Tower Tank	
EU026p	Top Stock Reject Tank	
EU026q	Top Stock Washer Hood Exhaust	
EU129	**Bio-Mass Conveying**	None
EU129a	Bio-Mass Conveyor & Pile	
EU129b	Bio-Mass Conveyor to Hog Fuel Boiler	
EU132	**Cyclones**	Cyclones
EU132a	M&D Sawdust Cyclone	
EU132b	No. 1 ADS Cyclone	
EU132c	No. 2 ADS Cyclone	
EU132d	No. 3 ADS Cyclone	
EU132e	No. 4 ADS Cyclone	
EU132f	Pin Chip Digester Cyclone	
EU132g	Sawdust Overs Cyclone	
EU132h	Unscreened Sawdust Cyclone	
EU133	**Micro-Pulsaire Baghouse (Chip Thickness Baghouse)**	Baghouse

EU134	**Storage Piles**	
EU134a	Chip Pile Management Raw Chips	Covered Conveyors
EU134b	Pin Chip Pile	Covered Conveyors
EU134c	Sawdust Handling & Storage Emissions	Covered Conveyors
EU134d	Screened Batch Chip Pile	None
EU134e	Screened Kamyr Chip Pile	None
EU134f	Bio-Mass Storage Pile	None
EU134g	Hog Fuel Storage & Handling Emissions	None

Emission Unit ID	Description	Pollution Control Device/Practice
	POWER, RECOVERY, AND RECAUSTICIZING DEPARTMENT	
EU001	**No. 3 Recovery Boiler**	ESP
EU002	**No. 4 Recovery Boiler**	ESP
EU003	**No. 5 Recovery Boiler**	ESP
EU011	**No. 1 Lime Kiln**	Wet Venturi Scrubber
EU012	**No. 2 Lime Kiln**	Wet Venturi Scrubber
EU013	**No. 3 Lime Kiln**	Wet Venturi Scrubber
EU014	**No. 4 Lime Kiln**	Wet Venturi Scrubber
EU015	**No. 3 Smelt Dissolving Tank**	Wet Scrubber
EU016	**No. 4 Smelt Dissolving Tank**	Wet Scrubber
EU017	**No. 5 Smelt Dissolving Tank**	Wet Scrubber
EU018	**No. 1 Lime Slaker**	Wet Scrubber
EU019	**No. 2 Lime Slaker**	Wet Scrubber
EU020	**No. 3 Lime Slaker**	Wet Scrubber
EU021	**Multi Fuel Boiler**	Wet Scrubber
EU024	**No. 1 Power Boiler**	
EU101	**Ash Handling**	
EU039	**Salt Cake/Lime Unloading**	
EU102	**Black Liquor Handling**	None
EU102a	No. 1 Concentrator Boil Out Tank	
EU102b	No. 1 Spill Collection Tank	
EU102c	No. 1 Weal Black Liquor Storage Tank Vent	
EU102d	No. 2 Spill Tank	
EU102e	No. 2 Weak Black Liquor Storage Tank Vent	
EU102f	No. 3 Recovery Boiler Dust Tank	
EU102g	No. 3 Recovery Boiler Mix Tank	
EU102h	No. 3 Weak Black Liquor Storage Tank Vent	
EU102i	No. 4 Recovery Boiler Dust Tank	
EU102j	No. 4 Recovery Boiler Mix Tank	
EU102k	No. 4 Weak Black Liquor Storage Tank	
EU102l	No. 5 Recovery Boiler Dust Tank	
EU102m	No. 5 Recovery Boiler Mix Tank	
EU102n	40% Black Liquor Tank Vent (No. 2 Tank)	
EU102o	65% Black Liquor Tank	
EU102p	No. 1 40% Heavy Black Liquor Tank	
EU102q	No. 2 40% Heavy Black Liquor Tank	
EU102r	No. 3 40% Heavy Black Liquor Tank	
EU102s	No. 3 65% Black Liquor Storage Tank	
EU102t	No. 4 65% Black Liquor Tank	
EU108	**Coke Handling**	None
EU109	**Condensate Collection**	
EU109a	No. 1 and N. 2 Evaporators (Foul Condensate)	

EU109b	No. 3 Evaporator (Combined Condensate)	
EU109c	No. 3 Evaporator (Foul Condensate)	
EU109d	No. 4 Evaporator (Condensate from Effect No. 2)	
EU109e	No. 4 Evaporator (Foul Condensate)	
EU109f	No. 2 Condensate/No. 5 Evaporator (Foul Condensate)	
EU109g	No. 1 Concentrator (Foul Condesate)	
EU109h	Turpentine Decanter	
EU109i	Batch Digester Blow Heat Recovery System (Condensate from Accumulator Secondary Condenser)	
EU109j	LVHC-NCG Line Drains	
EU109k	Foul Condensate Tank	
EU109l	Black Liquor Spill Tank No. 1	
EU110	**Low Volume High Concentration (LVHC) Non-Condensable Gas (NCG)**	
EU110a	No. 1 and No. 2 Evaporators: Vacuum Vents	
EU110b	No. 3 Evaporator: Vacuum Vents	
EU110c	No. 4 Evaporator: Vacuum Vents	
EU110d	No. 5 Evaporator: Vacuum Vents	
EU110e	No. 2 Concentrator: Hotwell and Vacuum System Vent	
EU110f	No. 1 Concentrator: Hotwell and Vacuum System Vent	
EU110g	M&D Digester: Blow Heat System Vent	
EU110h	Turpentine Condenser Vent	
EU110Ii	No, 1 and No. 2 Evaporators after condenser hotwell vents	
EU110j	No. 3 and No. 4 Evaporator Hotwell Vents	
EU110k	No. 2 Concentrator, No. 5 Evaporator Spiral Condenser Vent, and Hotwell Vent	
EU110l	No.1 Black Liquor Spill Blow Tanks	
EU110m	No. 3 Blow Tank	
EU110n	No. 1 and No.2 Blow Tanks	
EU110o	Foul Condensate Tank	
EU110p	No. 2 Evaporator Auxiliary Surface Condenser and After Condensers Vents	
EU110q	Spill Collection Tank – Weak Black Liquor (Secondary)	
EU119	**Quick Lime/Dry Lime Handling**	
EU119a	Hot Lime Tank No.3 Lime Kiln	
EU119b	Hot Lime Tank Vent No. 4 Lime Kiln	
EU119c	No. 1 Fresh Lime Bin	
EU119d	No. 2 Fresh Lime Bin	
EU119e	No. 3 Fresh Lime Tank Vent	
EU127	**Tall Oil Reactor**	None
EU127a	Tall Oil Reactor	
EU127b	Tall Oil Reactor Scrubber Vent	
EU131	**White Liquor Handling**	None
EU131a	No. 1 Recausticizer Tanks	
EU131b	No. 1 Weak Wash Tank Vent	
EU131c	No. 1 White Liquor Clarifier Tank	
EU131d	No. 1 White Liquor Storage Tank Vent	
EU131e	No. 2 Recausticizer Tank Sets	
EU131f	No. 2 Weak Wash Tank Vent	
EU131g	No .3 Recausticizer Tank Sets	
EU131h	No. 3 White Liquor Clarifier Vents	
EU131i	No. 4 White Liquor Clarifier Vents	
EU131j	No. 3 White Liquor Storage Tank Vent	

EU153	**Thermal Oxidizer**	
EU153a	Thermal Oxidizer Scrubber Stack	
EU154	**Steam Stripper**	
EU154a	Steam Stripper Vent	
EU154b	Steam Stripper Feed Tank	

Emission Unit ID	Description	Pollution Control Device/Practice
	PAPER MILL DEPARTMENT	
EU030	**No. 1 Paper Machine Wet End**	None
EU030a	No. 1 Machine Press Section Area Exhaust	
EU030b	No. 1 Machine Refiner Room Exhaust	
EU030c	No. 1 Machine Wet End Ceiling Exhaust	
EU030d	No. 1 Machine Wet End Room Exhaust	
EU030e	No. 1 Machine Vacuum Pump Sump Exhaust	
EU030f	No. 1 Machine Vac-u-foil Exhausters	
EU031	**No. 1 Paper Machine Dryer**	None
EU031a	No. 1 Machine Dryer Hood Exhaust	
EU032	**No. 2 Paper Machine Wet End**	None
EU032a	No. 2 Machine Wet End False Ceiling Roof Exhaust	
EU032b	No. 2 Machine Flat Box Separator Exhaust Fan	
EU032c	No. 2 Machine Vacuum Pump Sump Exhaust	
EU033	**No. 2 Paper Machine Dryer**	None
EU033a	No. 2 Machine Dryer Hood Exhaust No. 1	
EU033b	No. 2 Machine Dryer Hood Exhaust No. 2	
EU033c	No. 2 Machine Dryer Hood Exhaust No. 3	
EU033d	No. 2 Machine Dryer Hood Exhaust No. 4	
EU033e	No. 2 Machine Dryer Hood Exhaust No. 5	
EU033f	No. 2 Machine Dryer Hood Exhaust No. 6	
EU033g	No. 2 Machine Dryer Hood Exhaust No. 7	
EU034	**No. 3 Paper Machine Wet End**	None
EU034a	No. 3 Machine Press Section Area Roof Exhaust	
EU034b	No. 3 Machine Wet End False Ceiling Exhaust Fans	
EU034c	No. 3 Machine Broke Building Roof Fan	
EU034d	No. 3 Machine Refiner Room Exhaust	
EU034e	No. 3 Machine Vacuum Pump Pit Exhaust	
EU035	**No. 3 Paper Machine Dryer**	None
EU035a	No. 3 Machine Dry End Roof Exhaust	
EU035b	No. 3 Machine Dryer Hood Exhaust – 1st Section	
EU035c	No. 3 Machine Dryer Hood Exhaust – 2nd Section	
EU035d	No. 3 Machine Dryer Hood Exhaust – 3rd Section	
EU035e	No. 3 Machine Dryer Hood Exhaust – 4th Section	
EU035f	No. 3 Machine Dryer Hood Exhaust – 5th Section	
EU035g	No. 3 Machine Dryer Hood Exhaust – 6th Section	
EU035h	No. 3 Machine Dryer Hood Exhaust – 7th Section	
EU037	Starch Handling	Baghouse
EU038	Clay Handling	Baghouse
EU107	**Chemical Storage Tanks**	

Emission Unit ID	Description	Pollution Control Device/Practice
	ENVIRONMENTAL AND TECHNICAL DEPARTMENT	
EU130	**Effluent Treatment System**	None
EU130a	Recaust/Paper Mill Raw Post Consumer Effluent Vent	
EU130b	Sludge Holding Tank	
EU130c	Sludge Press	
EU130d	Sludge Press Building Vent	
EU130e	Sludge Storage Ponds	
EU130f	Primary Clarifier	
EU130g	Aeration Basin No. 1	
EU130h	Aeration Basin No. 2	
EU130i	Aeration Basin No. 3	
EU130j	Treated Effluent Ponds	
EU130k	Polishing Ponds	

Emission Unit ID	Description	Pollution Control Device/Practice
	ENGINEERING AND MAINTENANCE DEPARTMENT	
EU120	**Roads, Unpaved**	Reasonable Precautions
EU111	**Liquid Fuel Handling**	Reasonable Precautions
EU152	**CFC Recycling**	

SECTION III. PERMIT CONDITIONS - FACILITY WIDE

The following requirements and conditions are applicable to the facility or to specific emission units located at the facility (ARM 17.8.1211,1212, and 1213).

A. Facility-Wide General

Conditions	Rule Citation	Rule Description	Pollutant/Parameter	Limit
A.1	ARM 17.8.304(1)	Visible Air Contaminants	Opacity	40%
A.2	ARM 17.8.304(2)	Visible Air Contaminants	Opacity	20%
A.3	ARM 17.8.308(1)	Particulate Matter, Airborne	Fugitive Opacity	20%
A.4	ARM 17.8.308(2)	Particulate Matter, Airborne	Reasonable Precautions	-------
A.5	ARM 17.8.308	Particulate Matter, Airborne	Reasonable Precaution, Construction	20%
A.6	ARM 17.8.309	Particulate Matter, Fuel Burning Equipment	Particulate Matter	$E = 0.882 * H^{-0.1664}$ or $E = 1.026 * H^{-0.233}$
A.7	ARM 17.8.310	Particulate Matter, Industrial Processes	Particulate Matter	$E = 4.10 * P^{0.67}$ or $E = 55 * P^{0.11} - 40$
A.8	ARM 17.8.322(4)	Sulfur Oxide Emissions, Sulfur in Fuel	Sulfur in Fuel (liquid or solid fuels)	1 lb/MMBtu fired
A.9	ARM 17.8.322(5)	Sulfur Oxide Emissions, Sulfur in Fuel	Sulfur in Fuel (gaseous)	50 gr/100 CF
A.10	ARM 17.8.324(3)	Hydrocarbon Emissions, Petroleum Products	Gasoline Storage Tanks	-------
A.11	ARM 17.8.324	Hydrocarbon Emissions, Petroleum Products	65,000-Gallon Capacity	-------
A.12	ARM 17.8.324	Hydrocarbon Emissions, Petroleum Products	Oil-effluent Water Separator	-------
A.13	ARM 17.8.343	40 CFR 63, Subpart S	National Standards for Hazardous Air Pollutants for the Pulp and Paper Industry	-------
A.14	ARM 17.8.340	40 CFR 60, Subpart D	Standards of Performance for Fossil-Fuel-Fired Steam Generation for Which Construction is Commenced After August 17, 1971.	-------
A.15	ARM 17.8.340	40 CFR 60, Subpart BB	Standards of Performance for Kraft Pulp Mills	-------
A.16	ARM 17.8.710	CEM Data	Recovery Boilers, Limes Kilns, & Multi-fuel Boiler	-------
A.17	State of Montana Air Quality Control Implementation Plan	Missoula County Regulations	Emergency Episode Action Plan	-------
A.18	ARM 17.8.1212	Reporting Requirements	Compliance Monitoring	-------
A.19	ARM 17.8.1207	Reporting Requirements	Annual Certification	-------

Conditions

A.1. Pursuant to ARM 17.8.304(2), Smurfit-Stone shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed on or before November 23, 1968, that exhibit an opacity of 40% or greater averaged over 6 consecutive minutes, unless otherwise specified by rule or in this permit.

A.2. Pursuant to ARM 17.8.304(2), Smurfit-Stone shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes, unless otherwise specified by rule or in this permit.

A.3. Pursuant to ARM 17.8.308(1), Smurfit-Stone shall not cause or authorize the production, handling, transportation, or storage of any material unless reasonable precautions to control emissions of particulate matter are taken. Such emissions of airborne particulate matter from any stationary source shall not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes, unless otherwise specified by rule or in this permit.

A.4. Pursuant to ARM 17.8.308(2), Smurfit-Stone shall not cause or authorize the use of any street, road or parking lot without taking reasonable precautions to control emissions of airborne particulate matter, unless otherwise specified by rule or in this permit.

A.5. Pursuant to ARM 17.8.308, Smurfit-Stone shall not operate a construction site or demolition project unless reasonable precautions are taken to control emissions of airborne particulate matter. Such emissions of airborne particulate matter from any stationary source shall not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes, unless otherwise specified by rule or in this permit.

A.6. Pursuant to ARM 17.8.309, unless otherwise specified by rule or in this permit, Smurfit-Stone shall not cause or authorize particulate matter caused by the combustion of fuel to be discharged from any stack or chimney into the outdoor atmosphere in excess of the maximum allowable emissions of particulate matter for existing fuel burning equipment and new fuel burning equipment calculated using the following equations:

For existing fuel burning equipment (installed before November 23, 1968):
$E = 0.882 * H^{-0.1664}$

For new fuel burning equipment (installed on or after November 23, 1968):
$E = 1.026 * H^{-0.233}$

Where H is the heat input capacity in million BTU (MMBtu) per hour and E is the maximum allowable particulate emissions rate in pounds per MMBtu.

A.7. Pursuant to ARM 17.8.310, unless otherwise specified by rule or in this permit, Smurfit-Stone shall not cause or authorize particulate matter to be discharged from any operation, process, or activity into the outdoor atmosphere in excess of the maximum hourly allowable emissions of particulate matter calculated using the following equations:

For process weight rates up to 30 tons per hour: $E = 4.10 * P^{0.67}$
For process weight rates in excess of 30 tons per hour: $E = 55.0 * P^{0.11} - 40$

Where E is the rate of emissions in pounds per hour and P is the process weight rate in tons per hour.

A.8. Pursuant to ARM 17.8.322(4), Smurfit-Stone shall not burn liquid or solid fuels containing sulfur in excess of 1 pound per million BTU fired, unless otherwise specified by rule or in this permit.

A.9 Pursuant to ARM 17.8.322(5), Smurfit-Stone shall not burn any gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions, unless otherwise specified by rule or in this permit.

A.10. Pursuant to ARM 17.8.324(3), Smurfit-Stone shall not load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank is equipped with a vapor loss control device or is a pressure tank as described in ARM 17.8.324(1), unless otherwise specified by rule or in this permit.

A.11. Pursuant to ARM 17.8.324, unless otherwise specified by rule or in this permit, Smurfit-Stone shall not place, store or hold in any stationary tank, reservoir or other container of more than 65,000-gallon capacity any crude oil, gasoline or petroleum distillate having a vapor pressure of 2.5 pounds per square inch absolute or greater under actual storage conditions, unless such tank, reservoir or other container is a pressure tank maintaining working pressure sufficient at all times to prevent hydrocarbon vapor or gas loss to the atmosphere, or is designed and equipped with a vapor loss control device, properly installed, in good working order and in operation.

A.12. Pursuant to ARM 17.8.324, unless otherwise specified by rule or in this permit, Smurfit-Stone shall not use any compartment of any single or multiple-compartment oil-effluent water separator which compartment receives effluent water containing 200 gallons a day or more of any petroleum product from any equipment processing, refining, treating, storing or handling kerosene or other petroleum product of equal or greater volatility than kerosene, unless such compartment is equipped with a vapor loss control device, constructed so as to prevent emission of hydrocarbon vapors to the atmosphere, properly installed, in good working order and in operation.

A.13. Pursuant to ARM 17.8.343 and 40 CFR, Part 63, Subpart S, Smurfit-Stone shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements as required by 40 CFR 63, Subpart S-National Standards for Hazardous Air Pollutants for the Pulp and Paper Industry. The requirements include, but are not limited to the following:

a. The pulping process condensates from the listed equipment systems that in total contain a total Hazardous Air Pollutant (HAP) mass of 3.6 kilograms or more of total HAP (measured as methanol) per megagram (7.2 pounds per ton) of ODP for mills that do not perform bleaching.

b. Treat the pulping process condensates to remove methanol by recycling collected condensates specified in Section V.K (EU109) to systems, including the evaporator system, equipped with vent control or by removal in the steam stripper of at least 92 percent (by weight) of methanol per oven-dried ton pulp criteria (40 CFR 63.453(e)(3)).

c. Reduce total HAP emissions using a thermal oxidizer designed and operated at a minimum temperature of 871°C (1600°F) and a minimum residence time of 0.75 seconds.

d. Monitor the specified units in accordance with §63.453(k) and (n).

e. Maintain and operate in accordance to the Startup Shutdown Malfunction (SSM) Plan.

f. Comply with the requirements of §63.8 including the requirements for a Quality Control Plan.

A.14. Pursuant to ARM 17.8.340 and 40 CFR, Part 60, Subpart D, Smurfit-Stone shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements as required by 40 CFR 60, Subpart D-Standards of Performance for Fossil-Fuel-Fired Steam Generation for Which Construction is Commenced After August 17, 1971.

A.15. Pursuant to ARM 17.8.340 and 40 CFR, Part 60, Subpart BB, Smurfit-Stone shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements as required by 40 CFR 60, Subpart BB-Standards of Performance for Kraft Pulp Mills.

A.16. Failure to report CEM data required by Section V.A, B, C, G and J, which is not available because of monitor downtime or insufficient quality assurance, shall not be considered a violation of the reporting requirements of this section. However, the unavailability of such data may be violation of the monitoring requirements of Section V.A, B, C, G and J (ARM 17.8.710).

A.17. Smurfit-Stone shall comply with the requirements contained in Chapter 4 of the Missoula City-County Air Pollution Control Program (Chapter 32 of the State of Montana Air Quality Control Implementation Plan).

A.18. On or before February 15 and August 15 of each year, Smurfit-Stone shall submit to the Department the compliance monitoring reports required by Section VIII.D. These reports must contain all information required by Section VIII.D, as well as the information required by each individual emission unit. For the reports due by February 15 of each year, Smurfit-Stone may submit a single report, provided that it contains all the information required by Section VIII.B & VIII.D. Per ARM 17.8.1207,

> *any application form, report, or compliance certification submitted pursuant to ARM Title 17, Chapter 8, Subchapter 12 (including semiannual monitoring reports), shall contain certification by a responsible official of truth, accuracy and completeness. This certification and any other certification required under ARM Title 17, Chapter 8, Subchapter 12, shall state that,* ***"based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete."***

A.19. By February 15 of each year, Smurfit-Stone shall submit to the Department the compliance certification report required by Section VIII.B. The annual certification report required by Section VIII.B must include a statement of compliance based on the information available that identifies any observed, documented or otherwise known instance of noncompliance for each applicable requirement. Per ARM 17.8.1207,

> *any application form, report, or compliance certification submitted pursuant to ARM Title 17, Chapter 8, Subchapter 12 (including annual certifications), shall contain certification by a responsible official of truth, accuracy and completeness. This certification and any other certification required under ARM Title 17, Chapter 8, Subchapter 12, shall state that,* ***"based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete."***

B. Mill-Wide Permit Conditions

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
B.1, B.3, B.5, B.8, B.9	SO_2 Facility Wide	5000 lb/day	Calculate SO_2 Source Emission	Daily	Monthly
B.2, B.4, B.6, B.7, B.9	H_2S & PM_{10}	Ambient Air Monitoring	Appendix F	Appendix F	Appendix F

Conditions

B.1. Total sulfur dioxide emissions from the mill shall not exceed 5000 lb/day (ARM 17.8.1201(10)).

B.2. Smurfit-Stone shall conduct an ambient air monitoring program consisting of the following in accordance with Appendix F of this permit (ARM 17.8.1201(10)).

a. At least two analyzers to measure H_2S.

b. At least two PM-10 samplers.

c. At least one wind system.

d. Sampling sites, data reporting, and parameters to be monitored will be specified by the Department.

Compliance Demonstration

B.3. Smurfit-Stone shall calculate the daily SO_2 emissions from the mill in pounds per day to monitor compliance with Section III.B.1.

B.4. Smurfit-Stone shall operate and maintain the ambient air monitoring program in accordance with Appendix F of this permit to monitor compliance with Section III.B.2.

Recordkeeping

B.5. Smurfit-Stone shall maintain, on site, the record of the daily SO_2 emissions (in pounds per day) from the facility.

B.6. In the event of a total natural gas curtailment, Smurfit-Stone shall report, in addition to the reports required by in this permit, the following:

a. Daily SO_2 emissions from recovery boilers and power boilers.

b. Dates and times of curtailment.

c. Quantity and sulfur content of fuel oil burned.

d. All fuel oil burned must comply with ARM 17.8.322 – Sulfur In Fuel Oil rule, unless sulfur dioxide emissions are controlled on an equivalent basis.

B.7. Smurfit-Stone shall maintain records in accordance with Appendix F of this permit.

Reporting

B.8. Smurfit-Stone shall submit a monthly report to the Department. The report shall include:

a. The average daily pulp production in air-dried tons of pulp per day and other data as required by this permit; and

b. The highest daily SO_2 emissions value for the month.

B.9. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide:

a. A verification that all reporting has been completed as well as the added reports during a total natural gas curtailing event; and

b. A verification that the reports for the ambient air monitoring programs has been submitted in accordance with Appendix F of this permit.

SECTION IV.
PERMIT CONDITIONS
PULP, CHIP DOCK AND RECYCLED FIBER DEPARTMENT

A. Sawdust Handling, Chip Handling, Bio-Mass Conveying, Hog Fuel Handling

EU004 – Sawdust Handling
EU004a – Sawdust Fines to Hog Fuel (& chip screening fines)
EU004b – Sawdust Receipts
EU005 – Chip Handling
EU005a – Chip Production
EU005b – Chip Receipts
EU005c – Chip Fines to Hog Fuel (& sawdust fines)
EU129 – Bio-Mass Conveying
EU129a – Bio-Mass Conveyor & Pile
EU129b – Bio-Mass Conveyor to Hog Fuel Boiler
EU134f – Bio Mass Storage Pile
EU134g – Hog Fuel Storage and Handling Emissions

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
A.1, A.14, A.15, A.23, A.24	Opacity	20%	Method 9	As Required by Department	Semi-annual
			No. 1, 2, and 3 Truck Dump Usage	Ongoing	Semi-annual
A.2, A.16, A.21, A.24	Sawdust Conveyors	Control Fugitives	Hood & Skirt w/ Max Drop Height of 10 ft	Ongoing	Semi-annual
A.3, A.17, A.22, A.24	Sawdust Handled PT PM-10	(w/ 25% control) 0.75 lb/ton 0.27 lb/ton	Calculations w/ Established Equations	As Required by the Department	Semi-annual
			Method 9	Quarterly	Semi-annual
A.4, A.18, A.23, A.24	Chips Handled PT PM-10	0.18 lb/ton 0.065 lb/ton			
A.5, A.18, A.23, A.24	Hog Fuel Handled PT PM-10	1.0 lb/ton 0.36 lb/ton			
A.6, A.18, A.23, A.24	Fines – Chip Screen Handled PT PM-10	0.27 lb/ton 0.09 lb/ton			
A.7, A.18, A.23, A.24	Fines – Sawdust Screen Handled PT PM-10	0.75 lb/ton 0.27 lb/ton			
A.8, A.18, A.23, A.24	Screened Pins PT PM-10	0.09 lb/ton 0.005 lb/ton			
A.9, A.18, A.23, A.24	Screened Chips to Kamyr Pile PT PM-10	0.045 lb/ton 0.001 lb/ton			
A.10, A.18, A.23, A.24	Screened Chips to Batch Pile PT PM-10	0.045 lb/ton 0.001 lb/ton			
A.11, A.18, A.23, A.24	Screened Sawdust Overs to Chip Pile PT PM-10	0.09 lb/ton 0.005 lb/ton			
A.12, A.19, A.21, A.24	Chip Screen & Sawdust Screen Fines to Hog Fuel Pile	Control Fugitives	Operation of Target Plate and Bunker	Ongoing	Semi-annual
A.13, A.20, A.21, A.24	Quantity of Sawdust Overs	Weightometer on Sawdust Overs Belt	Maintain & Operate	Operate During Belt Operations	Semi-annual

Conditions

A.1. Smurfit-Stone shall not cause or authorize emissions from the chip and sawdust handling, truck dumping, storage bin and the storage bin unloading system to be discharged into the outdoor atmosphere that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(1)).

A.2. The sawdust conveyor(s) shall be controlled by a hood and skirt at the end of the conveyor to limit the free drop height (the distance from the bottom of the skirt to the sawdust pile) to a maximum of 10 feet (ARM 17.8.1201(10)).

A.3. Smurfit-Stone shall be limited to 0.75 lb/ton of sawdust handled for total particulate and 0.27 lb/ton of sawdust handled for PM-10 (SCC #3-07-008-03) with hood and skirt controls at 25%(ARM 17.8.1201(10)).

a. The total sawdust pile emissions shall be calculated as: TSP (total tons) = {(Qty Sawdust overs)*(0.18*[1-.25])/2000+(Qty Sawdust receipts-Qty Sawdust overs)*(1.0*[1-.25])/2000}.

b. The total sawdust pile emissions shall be calculated as: PM-10 (total tons) = {(Qty Sawdust overs)*(0.065*[1-.25])/2000+(Qty Sawdust receipts-Qty Sawdust overs)*(0.36*[1-.25])/2000}.

c. Smurfit-Stone shall ensure that the 10-foot maximum distance is met at all times. When the material under the belt is reclaimed, Smurfit-Stone shall shut down the conveyor, remove the material, and fill in the void with new material before restarting the conveyor to ensure the 10-foot maximum distance is met.

A.4. Smurfit-Stone shall be limited to 0.18 lb/ton of chips handled for total particulate and 0.065 lb/ton of chips handled for PM-10 (State emission estimate) (ARM 17.8.1201(10)).

A.5. Smurfit-Stone shall be limited to 1.0 lb/ton of hog fuel handled for total particulate and 0.36 lb/ton of hog fuel handled for PM-10 (SCC #3-07-008-03) (ARM 17.8.1201(10)).

A.6. Smurfit-Stone shall be limited to 0.27 lb/ton (controlled) of fines sent to hog fuel from chip screen handled for total particulate and 0.09 lb/ton (controlled) of fines sent to hog fuel from chip screen handled for PM-10 (Smurfit-Stone emission estimate) (ARM 17.8.1201(10)).

A.7. Smurfit-Stone shall be limited to 0.75 lb/ton (controlled) of fines sent to hog fuel from sawdust screen handled for total particulate and 0.27 lb/ton (controlled) of fines sent to hog fuel from sawdust screen handled for PM-10 (Smurfit-Stone emission estimate) (ARM 17.8.1201(10)).

A.8. Smurfit-Stone shall be limited to 0.09 lb/ton of screened pins sent to stockpile handled for total particulate and 0.005 lb/ton of screened pins sent to stockpile handled for PM-10 (Smurfit-Stone emission estimate) (ARM 17.8.1201(10)).

A.9. Smurfit-Stone shall be limited to 0.045 lb/ton of screened chips to Kamyr pile handled for total particulate and 0.001 lb/ton of screened chips to Kamyr pile handled for PM-10 (Smurfit-Stone emission estimate) (ARM 17.8.1201(10)).

A.10. Smurfit-Stone shall be limited to 0.045 lb/ton of screened chips to batch pile handled for total particulate and 0.001 lb/ton of screened chips to batch pile handled for PM-10 (Smurfit-Stone emission estimate) (ARM 17.8.1201(10)).

A.11. Smurfit-Stone shall be limited to 0.09 lb/ton of screened sawdust overs to chip pile handled for total particulate and 0.005 lb/ton of screened sawdust overs to chip pile handled for PM-10 (Smurfit-Stone emission estimate) (ARM 17.8.1201(10)).

A.12. Emissions from the fines from the chip screen and sawdust screen being sent by the pneumatic conveying system to the hog fuel pile shall be controlled by a target plate and bunker at the end of the discharge pile (ARM 17.8.1201(10)).

A.13. Smurfit-Stone shall maintain a weightometer on the sawdust overs belt to be used to determine the quantity of sawdust overs handled (ARM 17.8.1201(10)).

Compliance Demonstration

A.14. As required by the Department, Smurfit-Stone shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section IV.A.1. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 & 106).

A.15. Monitoring compliance with the opacity requirements contained in Section IV.A.1 for truck dumping includes maintaining the proper use of dump areas (ARM 17.8.1201(10)).

a. The #1 Dump is used to unload trucks only and uses a belt system to convey chips and sawdust to the stockpiles.

b. The #2 Dump is used to unload trucks only and uses a conveyor belt to convey chips to the stockpiles.

c. The #3 Dump is a combination truck or rail dump that conveys chips and sawdust using a belt system to the stockpiles.

A.16. A mechanism to allow for an inspector to measure the drop height must be provided at all times to demonstrate compliance with Section IV.A.2.

A.17. Smurfit-Stone shall use the equations contained in Section IV.A.3.a and b to monitor compliance with the limitations in Section IV.A.3 at any time.

A.18. Quarterly, Smurfit-Stone shall perform Method 9 testing in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section IV.A.3 through IV.A.11. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 & 106).

A.19. Smurfit-Stone shall verify that the target plate and bunker at the end of the discharge pile have been used as emissions control to monitor compliance with Section IV.A.12.

A.20. Smurfit-Stone shall verify that a weightometer on the sawdust overs belt is to be used, when the belt is operating, to determine the quantity of sawdust overs handled to monitor compliance with Section IV.A.13.

Recordkeeping

A.21. Recordkeeping is not required to monitor compliance with Sections IV.A.1, A.15, A.19, and A.20.

A.22. Smurfit-Stone shall maintain, on site, records of the quantity of sawdust overs and sawdust receipts and submit calculations to the Department upon request.

A.23. All test records must be maintained on site and submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual.

Reporting

A.24. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide:

a. Verification that the drop height was maintained;

b. Verification that the records required by Section IV.A.22 were maintained;

c. Verification that the that the target plate and bunker were maintained;

d. Verification that the weightometer was maintained when the belt was operating; and

e. A summary of results of the last source testing that was performed.

B. Washing

EU026 - Washing

Base Stock (Brown Stock) Washing
EU026a – No. 3 Base Stock Washer Feed Tank
EU026b – Base Stock Washer Walkway Exhaust
EU026c – No. 1 Base Stock Filtrate Tank
EU026d – No.2 Base Stock Filtrate Tank
EU026e – Spill Collection Tank – Base Washers

CB Washing (M&D Washing)
EU026f – CB Washer Filtrate Tank
EU026g – CB Washers (M&D System)
EU026 h – M&D Foam Tower

PC Washing
EU026i – Foam Vent Tanks
EU026j – Intermediate Foam Tower
EU026k – PC Washer Vent
EU026l – PC Washer Stack I
EU026m – PC Washer Stack II

Top Stock Washing
EU026n - Base Stock Reject Tank
EU026o – Top Stock Foam Tower Tank
EU026p – Top Stock Reject Tank
EU026q – Top Stock Washer Hood Exhaust

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
B.1, B.5 B.8, B.10	Brown Stock Washers	128 lb/day & 5.33 lb/hr	40 CFR 60, App A 40 CFR 51 App M	As Required by the Department	Semi-annual
B.2, B.6, B.9, B.10	PC Washer #1 Base Washer #2 Base Washer Top Washer	Wet Scrubbers	Operate and Maintain	Ongoing	Semi-annual
B.3, B.7, B.8, B.10	Opacity Base Stock Brown Stock Washing, CB Washing (M&D), & Top Stock Washing	20%	Method 9	As Required by the Department	Semi-annual
B.4, B.7, B.8, B.10	Opacity PC Washing	40%	Method 9	As Required by the Department	Semi-annual

Conditions

B.1. Particulate emissions from the Brown Stock Washers shall be limited to a total of 128 lb/day and 5.33 lb/hr (ARM 17.8.1201(10)).

B.2. The PC Washer, #1 Base Washer, #2 Base Washer, and Top Washer's emissions shall be controlled by the wet scrubber (ARM 17.8.1201(10)).

B.3. Smurfit-Stone shall not cause or authorize emissions to be discharged into the outdoor atmosphere from the Base Stock (Brown Stock) Washing, CB Washing (M&D Washing), and Top Stock Washing that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(1)).

B.4. Smurfit-Stone shall not cause or authorize emissions from the PC Washing to be discharged into the outdoor atmosphere that exhibit an opacity of 40% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).

Compliance Demonstration

B.5. As required by the Department, monitoring compliance with Section IV.B.1 above shall be accomplished by EPA source sampling methods specified in 40 CFR Part 60, Appendix A. PM-10 sampling methods are specified by 40 CFR Part 51, Appendix M including back half, except as provided in Appendix E of this permit or total particulate results may be used as a surrogate for PM-10 if the impinger analysis ("back-half") is included.

B.6. Verify that the wet scrubbers are operated and maintained during operation of the washers to monitor compliance with Section IV.B.2.

B.7. As required by the Department, Smurfit-Stone shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section IV.B.3 and B.4. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 & 106).

Recordkeeping

B.8. All test records must be maintained on site and submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual as required by Section IV.B.5 and B.7.

B.9. No recordkeeping is required to monitor compliance with Section IV.B.6.

Reporting

B.10. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide:

a. A summary of results of the last source testing that was performed; and

b. Verification that the wet scrubbers were operated and maintained.

C. Cyclones

EU132 - Cyclones
EU132a – M&D Sawdust Cyclone
EU132b – No. 1 ADS Cyclone
EU132c – No. 2 ADS Cyclone
EU132d – No. 3 ADS Cyclone
EU132e – No. 4 ADS Cyclone
EU132f – Pin Chip Digester Cyclone
EU132g – Sawdust Overs Cyclone
EU132h – Unscreened Sawdust Cyclone

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
C.1, C.12, C.15, C.17	Opacity M&D Sawdust Cyclone, No. 1 ADS Cyclone, No. 2 ADS Cyclone, No. 3 ADS Cyclone, No. 4 ADS Cyclone, Sawdust Overs Cyclone, Unscreened Sawdust Cyclone	20%	Method 9	As Required by the Department	Semi-annual
C.2, C.12, C.15, C.17	Opacity Pin Chip Digester Cyclone	40%	Method 9	As Required by the Department	Semi-annual
C.3, C.13, C.15, C.17	M&D Cyclone PT	60 lb/day 2.5 lb/hr	40 CFR 60, App. A 40 CFR 51, App.M	As Required by the Department	Semi-annual
C.4, C.13, C.15, C.17	M&D Cyclone PM-10	24 lb/day 1.0 lb/hr			
C.5, C.13, C.15, C.17	Pins Cyclone PT	60 lb/day 2.5 lb/hr			
C.6, C.13, C.15, C.17	Pins Cyclone PM-10	24 lb/day 1.0 lb/hr			
C.7, C.13, C.15, C.17	ADS Slicers and Cyclones PT	26.4 lb/day 1.10 lb/hr			
C.8, C.13, C.15, C.17	ADS Slicers and Cyclones PM-10	26.4 lb/day 1.1 lb/hr			
C.9, C.13, C.15, C.17	Sawdust Overs Cyclone PT	26.4 lb/day 1.1 lb/hr			
C.10, C.13, C.15, C.17	Sawdust Overs Cyclone PM-10	26.4 lb/day 1.1 lb/hr			
C.11, C.14, C.16, C.17	All Cyclones	Each Limited to 8544 hr During Any 12-Month Rolling Period	Maintain a Log	Monthly Calculations	Semi-annual

Conditions

C.1. Smurfit-Stone shall not cause or authorize emissions to be discharged into the outdoor atmosphere from the M&D Sawdust Cyclone, No. 1 ADS Cyclone, No. 2 ADS Cyclone, No. 3 ADS Cyclone, No. 4 ADS Cyclone, Sawdust Overs Cyclone and the Unscreened Sawdust Cyclone that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(1)).

C.2. Smurfit-Stone shall not cause or authorize emissions from the Pins Chip Digester Cyclone to be discharged into the outdoor atmosphere that exhibit an opacity of 40% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).

C.3. Total suspended particulate emissions from the M&D Cyclone shall be limited to 60 lb/day and 2.5 lb/hr (ARM 17.8.1201(10)).

C.4. PM-10 emissions from the M&D Cyclone shall be limited to 24 lb/day and 1.0 lb/hr (ARM 17.8.1201(10)).

C.5. Total suspended particulate emissions from the Pins Cyclone shall be limited to 60 lb/day and 2.5 lb/hr (ARM 17.8.1201(10)).

C.6. PM-10 emissions from the Pins Cyclone shall be limited to 24 lb/day and 1.0 lb/hr (ARM 17.8.1201(10)).

C.7. Total suspended particulate emissions from the ADS Slicers and Cyclones shall not exceed 26.4 lb/day and 1.10 lb/hr for each cyclone (ARM 17.8.1201(10)).

C.8. PM-10 emissions from the ADS Slicers and Cyclones shall not exceed 26.4 lb/day and 1.1 lb/hr for each cyclone (ARM 17.8.1201(10)).

C.9. Total suspended particulate emissions from the Sawdust Overs Cyclone shall not exceed 26.4 lb/day and 1.1 lb/hr for each cyclone (ARM 17.8.1201(10)).

C.10. PM-10 emissions from this source shall not exceed 26.4 lb/day and 1.1 lb/hr for the Sawdust Overs Cyclone (ARM 17.8.1201(10)).

C.11. The M&D Cyclone, Pins Cyclone, ADS Slicers and Cyclones, and the Sawdust Overs Cyclone shall each not be operated more than 8544 hours during any 12-month rolling period (ARM 17.8.1201(10)).

Compliance Demonstration

C.12. As required by the Department, Smurfit-Stone shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section IV.C.1 and C.2. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 & 106).

C.13. As required by the Department, monitoring compliance with Section IV.C.3 through C.10 above shall be accomplished by EPA source sampling methods specified in 40 CFR Part 60, Appendix A. PM-10 sampling methods are specified by 40 CFR Part 51, Appendix M including back half, except as provided in Appendix E of this permit or total particulate results may be used as a surrogate for PM-10 if the impinger analysis ("back-half") is included.

C.14. Smurfit-Stone shall maintain by month, the total hours of operation of each of the cyclones and slicers listed in Section IV.C.11. By the 25th of each month, Smurfit-Stone shall add up the total hours of operation of the cyclones and slicers during the previous 12 months to monitor compliance with Section IV.C.11.

Recordkeeping

C.15. All test records must be maintained on site and submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual.

C.16. The log of operational hours as required by Section IV.C.11 shall be maintained on site and submitted to the Department upon request.

Reporting

C.17. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide:

a. A summary of results of the last source testing that was performed; and

b. A summary of the log of operational hours.

D. Micro-Pulsaire Baghouse

EU133 – Micro-Pulsaire Baghouse – Chip Thickness Baghouse

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
D.1, D.5, D.8, D.10	Opacity	20%	Method 9	As Required by the Department	Semi-annual
D.2, D.3, D.6, D.8, D.10	Baghouse PT & PM-10	24 lb/day 1.0 lb/hr	40 CFR 60 App. A 40 CFR 51 App.M	Annually	Semi-annual
D.4, D.7, D.9, D.10	Baghouse	Each Limited to 8544 hr During Any 12-Month Rolling Period	Maintain a Log	Monthly Calculations	Semi-annual

Conditions

D.1. Smurfit-Stone shall not cause or authorize emissions to be discharged into the outdoor atmosphere from the Micro-Pulsaire Baghouse that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(1)).

D.2. Total suspended particulate emissions from this baghouse shall be limited to 24 lb/day and 1.0 lb/hr (ARM 17.8.1201(10)).

D.3. PM-10 emissions from this baghouse shall be limited to 24 lb/day and 1.0 lb/hr (ARM 17.8.1201(10)).

D.4. This baghouse shall not be operated more than 8544 hours during any 12-month rolling period (ARM 17.8.1201(10)).

Compliance Demonstration

D.5. As required by the Department, Smurfit-Stone shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section IV.D.1. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 & 106).

D.6. Annually, monitoring compliance with Section IV.D.2 and 3 shall be accomplished by EPA source sampling methods specified in 40 CFR Part 60, Appendix A. PM-10 sampling methods are specified by 40 CFR Part 51, Appendix M including back half, except as provided in Appendix E of this permit or total particulate results may be used as a surrogate for PM-10 if the impinger analysis ("back-half") is included.

D.7. Smurfit-Stone shall maintain by month, the total hours of operation of each baghouse. By the 25th of each month, Smurfit-Stone shall add up the total hours of operation each baghouse during the previous 12 months to monitor compliance with Section IV.D.4.

Recordkeeping

D.8. All test records must be maintained on site and submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual.

D.9. The log of operational hours as required by Section IV.D.7 shall be maintained on site and submitted to the Department upon request.

Reporting

D.10. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide:

a. A summary of results of the last source testing that was performed; and

b. A summary of the log of operational hours.

E. Storage Piles

EU134 – Storage Piles
EU134a – Chip Pile Management Raw Chips
EU134b – Pin Chip Pile
EU134c – Sawdust Handling & Storage Emissions
EU134d – Screened Batch Chip Pile
EU134e – Screened Kamyr Chip Pile

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
E.1, E.2, E.3, E.4	Opacity	20%	Method 9	As Required by the Department	Semi-annual

Conditions

E.1. Smurfit-Stone shall not cause or authorize the production, handling, transportation, or storage of any material unless reasonable precautions to control emissions of particulate matter are taken. Such emissions of airborne particulate matter from EU134(a-e) Storage Piles shall not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.308(1)).

Compliance Demonstration

E.2. As required by the Department, Smurfit-Stone shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 & 106).

Recordkeeping

E.3. All test records must be maintained on site and submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual.

Reporting

E.4. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide a summary of results of the last source testing that was performed.

SECTION V.
PERMIT CONDITIONS
POWER, RECOVERY, AND RECAUSTICIZING DEPARTMENT

A. No. 3 Recovery Boiler

EU001 – No. 3 Recovery Boiler

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
A.1, A.12, A.20, A.26, A.27	Black liquor firing rate	Daily Rate	Maintain Log	Daily	Monthly
A.2, A.13, A.21, A.27	TSP	979 lb/day 40.79 lb/hr	40 CFR Part 60, Appendix A	Annually Semi-annual if above 80% of permit limit	Semi-annual
A.3, A.13, A.21, A.27	PM-10	979 lb/day 40.79 lb/hr	40 CFR Part 60, Appendix M	Annually Semi-annual if above 80% of permit limit	Semi-annual
A.4, A.13, A.21, A.27	Total Sulfate	979 lb/day 40.79 lb/hr	40 CFR Part 60, Appendix A	Annually Semi-annual if above 80% of permit limit	Semi-annual
A.5, A.13, A.21, A.27	Total Reduced Sulfur	≤ 5 ppm, 24-hr average	CEM	24-hr Avg.	Semi-annual
A.6, A.14, A.22, A.27	Total Reduced Sulfur	CEM	Operate and Maintain	Ongoing	Semi-annual
A.7, A.15, A.23, A.26	TSP	451 lb/Day – Monthly Average	COM Data & Correlation Equations	Monthly	Monthly
A.8, A.16, A.24, A.27	Correlation Equations	Proposed Changes	Request Department Approval	As Necessary	Semi-annual
A.9, A.17, A.25, A.26	Opacity	35%	COM Method 9	Ongoing	Monthly
A.10, A.18, A.25, A.27, A.28	Opacity	COM	Operate and Maintain	Ongoing	Semi-annual
			EER Reports	As Necessary	Quarterly
A.11, A.19, A.24, A.27	Particulate Emissions	ESP	Operate and Maintain	Ongoing	Semi-annual

Conditions

A.1. Smurfit-Stone shall report, monthly, the daily black liquor firing rate for the No. 3 Recovery Boiler (ARM 17.8.710).

A.2. Total suspended particulate emissions from the No. 3 Recovery Boiler shall not exceed 979 lb/day and 40.79 lb/hr (ARM 17.8.1201(10)).

A.3. PM-10 emissions from the No. 3 Recovery Boiler shall not exceed 979 lb/day and 40.79 lb/hr (ARM 17.8.1201(10)).

A.4. Total sulfate emissions from the No. 3 Recovery Boiler shall not exceed 979 lb/day and 40.79 lb/hr (ARM 17.8.1201(10)).

A.5. Total reduced sulfur (TRS) emissions from the No. 3 Recovery Boiler shall not exceed 5 ppm, 24-hour average (ARM 17.8.1201(10)).

A.6. A continuous emission monitor for TRS compounds is required for the No. 3 Recovery Boiler (ARM 17.8.1201(10)).

A.7. The monthly average of total suspended particulate for the No. 3 Recovery Boiler shall not exceed 451 lb/day (ARM 17.8.1201(10)).

A.8. Smurfit-Stone shall submit to the Department, for approval, any proposed changes to the correlation equations used to determine particulate mass emissions (ARM 17.8.1201(10)).

A.9. Smurfit-Stone shall not discharge into the outdoor atmosphere emissions from the No. 3 Recovery Boiler that exhibit 35% opacity or greater averaged over 6 consecutive minutes (ARM 17.8.321).

A.10. Opacity continuous emission monitors (COMS) shall be operated and maintained on the No. 3 Recovery Boiler (ARM 17.8.1201(10)).

A.11. Smurfit-Stone shall operate and maintain an electrostatic precipitator (ESP) on the No. 3 Recovery Boiler (ARM 17.8.1201(10)).

Compliance Demonstration

A.12. Smurfit-Stone shall maintain a record of the daily black liquor firing rate for the No. 3 Recovery Boiler to monitor compliance with Section V.A.1.

A.13. Annually, monitoring compliance with the Section V.A.2 through A.4 standards shall be accomplished by EPA source sampling methods specified in 40 CFR Part 60, Appendix A, including back-half particulate, except as provided in Appendix E of this permit. PM-10 sampling methods are specified by 40 CFR Part 51, Appendix M, including back half, except as provided in Appendix E of this permit or total particulate results may be used as a surrogate for PM-10 if the impinger analysis ("back-half") is included. Smurfit-Stone shall test the No. 3 Recovery Boiler for total particulate and PM-10 at 90% of maximum rated capacity to monitor compliance with Section V.A.2. TRS emissions are determined by continuous monitoring with 24-hour averages to determine compliance with Section V.A.5.

If the results from the annual testing are at 80% of the permit limitation or greater, then testing shall occur on a semi-annual basis. After Smurfit-Stone tests' results are below 80% of the permit limitations, then Smurfit-Stone may return to annual testing no later than one year from the last test date.

A.14. The TRS CEM is not required to conform to federal specifications. Smurfit-Stone uses Barton titrators, or another method approved by the Department, to fulfill this requirement to monitor compliance with Section V.A.5 and A.6. This monitor does not meet federal specifications; however, it is sufficient to monitor this pollutant at this time.

A.15. Monthly emissions shall be determined by continuous opacity monitoring and the correlation equations to monitor compliance with Section V.A.7.

A.16. Smurfit-Stone shall notify the Department of any proposed changes to the correlation equations used to determine particulate mass emissions to monitor compliance with Section V.A.8.

A.17. Compliance with Section V.A.9 shall be determined with the COMS as the primary measure of compliance with the opacity limit, except that the Department may use another appropriate method of demonstrating compliance, as specified in the Montana Source Test Protocol and Procedures Manual, including the test method contained in 40 CFR Part 60, Appendix A, Method 9, when the Department has reason to believe that COMS data is not accurate or when COMS data is unavailable (ARM 17.8.321(15)).

A.18. The COM is required to conform to federal specifications. The opacity COM is required to provide a daily (mill day) average opacity reading to monitor compliance with Section V.A.10.

A.19. Smurfit-Stone shall verify the operation and maintenance of the ESP on the No. 3 Recovery Boiler to monitor compliance with Section V.A.11.

Recordkeeping

A.20. The record of the daily black liquor firing rate for the No. 3 Recovery Boiler shall be maintained on site and submitted to the Department in the monthly report.

A.21. All test records must be maintained on site and submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual.

A.22. Smurfit-Stone shall operate and maintain the TRS CEM and records shall be submitted to the Department upon request.

A.23. The opacity monitors required to monitor compliance with Section V.A.7 will provide a 24-hour average opacity that will be converted to gr/dscf and then converted to lb/day and lb/day monthly average using the correlation equations to determine particulate mass emissions. Smurfit-Stone shall maintain a correlation between opacity and particulate emissions (from stack test results) and use this correlation to calculate daily and monthly averages.

A.24. No recordkeeping is necessary to monitor compliance with Section V.A.16 and A.19.

A.25. The COM shall be operated and maintained and records shall be submitted to the Department upon request to monitor compliance with the opacity limitation.

Reporting

A.26. Smurfit-Stone shall submit a monthly report to the Department. The monthly report shall include:

a. The daily black liquor firing rate for the No. 3 Recovery Boiler.

b. Daily averages for TRS for the No. 3 Recovery Boiler.

c. A monthly average for pounds of sulfur emitted per 1000 pounds of black liquor burned for the No.3 Recovery Boiler.

d. Average daily and average monthly total particulate emissions as determined by the correlation equations used to determine particulate mass emissions for the No. 3 Recovery Boiler. This report shall include daily calculated grains loading (gr/dscf), air flow (dscfm), total particulate (lb/hour), and the 24-hour average opacity.

A.27. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide:

a. A summary of results of the last source testing that was performed;

b. Notification of any proposed changes to the correlation equations;

c. A summary of calculations using the correlation equations used to determine particulate mass emissions;

d. A brief summary of previously submitted COM and CEM data; and

e. A verification that the ESP was operated and maintained.

A.28. Quarterly, Smurfit-Stone shall submit excess emission reports for the COM continuous emission monitors. This report shall include:

a. The magnitude of excess emissions computed in accordance with 60.13(h), any conversion factors used, and the date and time of commencement and completion of each time period of excess emissions.

b. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility; the nature and cause of any malfunction (if known); the corrective action taken or preventative measures adopted.

c. The date and time identifying each period during which the continuous monitoring system was inoperative, except for zero and span checks.

d. When no excess emissions have occurred, or the continuous monitoring systems have been inoperative such information shall be stated in the report.

e. The excess emission reports shall be completed in a format supplied or approved by the Department.

B. No. 4 Recovery Boiler

EU002 – No. 4 Recovery Boiler

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
B.1, B.12, B.20, B.26	Black Liquor Firing Rate	Daily Rate	Maintain Log	Daily	Monthly
B.2, B.13, B.21, B.27	TSP	1253 lb/day 52.21 lb/hr	40 CFR Part 60, Appendix A	Annually Semi-annual if above 80% of permit limit	Semi-annual
B.3, B.13, B.21, B.27	PM-10	1253 lb/day 52.21 lb/hr	40 CFR Part 60, Appendix A	Annually Semi-annual if above 80% of permit limit	Semi-annual
B.4, B.13, B.21, B.27	Total Sulfate	1253 lb/day 52.21 lb/hr	40 CFR Part 60, Appendix M	Annually	Semi-annual
B.5, B.13, B.21, B.27	Total Reduced Sulfur	≤ 5 ppm, 24-hr Average	CEM	24-hr Avg.	Monthly

B.6, B.14, B.22, B.27	Total Reduced Sulfur	CEM	Operate and Maintain	Ongoing	Semi-annual
B.7, B.15, B.23, B.26	TSP	928 lb/Day – Monthly Average	COM Data & Correlation Equations	Monthly	Monthly
B.8, B.16, B.24, B.27	Correlation Equations	Proposed Changes	Request Department Approval	As Necessary	Semi-annual
B.9, B.17, B.25, B.26	Opacity	20%	COM	Ongoing	Monthly
B.10, B.18, B.25, B.27, B.28	Opacity	COM	Operate and Maintain	Ongoing	Semi-annual
			EER Reports	As Necessary	Quarterly
B.11, B.19, B.24, B.27	Particulate Emissions	ESP	Operate and Maintain	Ongoing	Semi-annual

Conditions

B.1. Smurfit-Stone shall report, monthly, the daily black liquor firing rate for the No. 4 Recovery Boiler (ARM 17.8.710).

B.2. Total suspended particulate emissions from the No. 4 Recovery Boiler shall not exceed 1253 lb/day and 52.21 lb/hr (ARM 17.8.1201(10)).

B.3. PM-10 emissions from the No. 4 Recovery Boiler shall not exceed 1253 lb/day and 52.21 lb/hr (ARM 17.8.1201(10)).

B.4. Total sulfate emissions from the No. 4 Recovery Boiler shall not exceed 1253 lb/day and 52.21 lb/hr (ARM 17.8.1201(10)).

B.5. Total reduced sulfur (TRS) emissions from the No. 4 Recovery Boiler shall not exceed 5 ppm, 24-hour average (ARM 17.8.1201(10)).

B.6. A continuous emission monitor for TRS compounds is required for this source (ARM 17.8.1201(10)).

B.7. The monthly average total suspended particulate for the No. 4 Recovery Boiler shall not exceed 928 lb/day (ARM 17.8.1201(10)).

B.8. Smurfit-Stone shall submit for approval to the Department any proposed changes to the correlation equations used to determine particulate mass emissions (ARM 17.8.1201(10)).

B.9. Smurfit-Stone shall not discharge into the outdoor atmosphere emissions from the No. 4 Recovery Boiler that exhibit 20% opacity or greater averaged over 6 consecutive minutes for more than 6% of the 6-minute time periods during which the No. 4 Recovery Boiler is operating within a calendar quarter (ARM 17.8.321).

B.10. COM shall be operated and maintained on the No. 4 Recovery Boiler (ARM 17.8.1201(10)).

B.11. Smurfit-Stone shall operate and maintain an ESP on the No. 4 Recovery Boiler (ARM 17.8.1201(10)).

Compliance Demonstration

B.12. Smurfit-Stone shall maintain a record of the daily black liquor firing rate for the No. 4 Recovery Boiler to monitor compliance with Section V.B.1.

B.13. Annually, monitoring compliance with the Section V.B.2 through B.4 standards shall be determined by EPA source sampling methods specified in 40 CFR Part 60, Appendix A, including back-half particulate, except as provided in Appendix E of this permit. PM-10 sampling methods are specified by 40 CFR Part 51, Appendix M, including back half, except as provided in Appendix E of this permit or total particulate results may be used as a surrogate for PM-10 if the impinger analysis ("back-half") is included. Smurfit-Stone shall test the No. 4 Recovery Boiler for total particulate and PM-10 at 90% of maximum rated capacity to monitor compliance with Section V.B.2. TRS emissions are determined by continuous monitoring with 24-hour averages to monitor compliance with Section V.B.5.

If the results from the annual testing are at 80% of the permit limitation or greater, then testing shall occur on a semi-annual basis. After Smurfit-Stone tests' results are below 80% of the permit limitations, then Smurfit-Stone may return to annual testing no later than one year from the last test date.

B.14. The TRS CEM is not required to conform to federal specifications. The #4 Recovery Boiler has a modified Astech monitor, or another monitor approved by the Department, to monitor compliance with Section V.B.5 and B.6. This monitor does not meet federal specifications; however, it is sufficient to monitor this pollutant at this time.

B.15. Monthly emissions shall be determined by continuous opacity monitoring and the correlation equations to monitor compliance with Section V.B.7.

B.16. Smurfit-Stone shall notify the Department of any proposed changes to the correlation equations used to determine particulate mass emissions to monitor compliance with Section V.B.8.

B.17. Compliance with Section V.B.9 shall be determined with the COMS as the primary measure of compliance with the opacity limit, except that 40 CFR Part 60, Appendix A, Method 9, may be used as a measure of compliance when there is reason to believe that COMS data is not accurate or when COMS data is unavailable (ARM 17.8.321(15)).

B.18. The COMs are required to conform to federal specifications. The COMs are required to provide a daily (mill day) average opacity reading to monitor compliance with Section V.B.10.

B.19. Smurfit-Stone shall verify the operation and maintenance of the ESP on the No. 4 Recovery Boiler to monitor compliance with Section V.B.11.

Recordkeeping

B.20. The record of the daily black liquor firing rate for the No. 4 Recovery Boiler shall be maintained on site and submitted to the Department in the monthly report.

B.21. All test records must be maintained on site and submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual.

B.22. Smurfit-Stone shall operate and maintain the TRS CEM and records shall be submitted to the Department upon request.

B.23. The opacity monitors required to monitor compliance with SectionV.B.7 will provide a 24-hour average opacity that will be converted to gr/dscf and then converted to lb/day and lb/day monthly average using the correlation between opacity and particulate emissions. Smurfit-Stone shall maintain a correlation between opacity and particulate emissions (from stack test results) and use this correlation to calculate daily and monthly averages.

B.24. No recordkeeping is necessary to monitor compliance with Section V.B.16 and B.19.

B.25. The COM shall be operated and maintained and records shall be submitted to the Department upon request to monitor compliance with the opacity limitation.

Reporting

B.26. Smurfit-Stone shall submit a monthly report to the Department. The monthly report shall include:

a. The daily black liquor firing rate for the No. 4 Recovery Boiler.

b. Daily averages for TRS for the No. 4 Recovery Boiler.

c. A monthly average for pounds of sulfur emitted per 1000 pounds of black liquor burned for the No. 4 Recovery Boiler.

d. Monthly average of the daily total particulate emissions as determined by the correlation equations for the No. 4 Recovery Boiler. This report shall include daily calculated grain loading (gr/dscf), air flow (dscfm), total particulate (lb/hour), and the 24-hour average opacity.

B.27. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide:

a. A summary of results of the last source testing that was performed;

b. Notification of any proposed changes to the correlation equations;

c. A summary of calculations using the correlation equations to determine particulate mass emissions;

d. A brief summary of previously submitted COM and CEM data; and

e. A verification that the ESP was operated and maintained.

B.28. Quarterly, Smurfit-Stone shall submit excess emission reports for the COM. This report shall include:

a. The magnitude of excess emissions computed in accordance with 60.13(h), any conversion factors used, and the date and time of commencement and completion of each time period of excess emissions.

b. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility; the nature and cause of any malfunction (if known); the corrective action taken or preventative measures adopted.

c. The date and time identifying each period during which the continuous monitoring system was inoperative, except for zero and span checks.

d. When no excess emissions have occurred, or the continuous monitoring systems have been inoperative such information shall be stated in the report.

e. The excess emission reports shall be completed in a format supplied or approved by the Department.

C. No. 5 Recovery Boiler

EU003 – No. 5 Recovery Boiler

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
C.1, C.13, C.22, C.29, C.31	Black Liquor Firing Rate	Daily Rate	Maintain Log	Daily	Monthly
C.2, C.14, C.23, C.31	TSP	0.044gr/dscf corrected to 8% O_2 633.6 lb/Day 26.4 lb/hr	40 CFR Part 60, Appendix A	Annually Semi-annual if above 80% of permit limit	Semi-annual
C.3, C.14, C.23, C.31	PM-10	633.6 lb/Calendar Day 26.4 lb/hr	40 CFR Part 51, Appendix M	Annually Semi-annual if above 80% of permit limit	Semi-annual
C.4, C.14, C.23, C.31	Total Sulfate	633.6 lb/Calendar Day 26.4 lb/hr	CEM	Ongoing	Monthly
C.5, C.14, C.23, C.31	Total Reduced Sulfur	≤ 5 ppm corrected to 8% O_2, 12-hr Average	40 CFR Part 60, Appendix B	Annually Semi-annual if above 80% of permit limit	Semi-annual
C.6, C.15, C.24, C.31	Total Reduced Sulfur	CEM	Operate and Maintain	Ongoing	Semi-annual
C.7, C.16, C.25, C.29, C.31	TSP	384 lb/Day – Monthly Average	COM Data & Correlation Equations	Monthly	Monthly
C.8, C.17, C.26, C.31	Correlation Equations	Proposed Changes	Request Department Approval	As Necessary	Semi-annual
C.9, C.18, C.27, C.29, C.31	Opacity	20%	COM Method 9	Ongoing	Monthly
C.10, C.19, C.27, C.31	Opacity	COM	Operate and Maintain	Ongoing	Semi-annual
C.11, C.20, C.26, C.31	Particulate Emissions	ESP	Operate and Maintain	Ongoing	Semi-annual
C.12, C.21, C.28, C.30, C.31	No. 5 Recovery Boiler	40 CFR 60, Subpart BB	40 CFR 60, Subpart BB	40 CFR 60, Subpart BB	Semi-annual
C.12, C.21, C.28, C.30, C.31	No. 5 Recovery Boiler	EER	Complete Reports	As Necessary	Quarterly

Conditions

C.1. Smurfit-Stone shall report monthly the daily black liquor firing rate for the No. 5 Recovery Boiler (ARM 17.8.710).

C.2. Total suspended particulate emissions from the No. 5 Recovery Boiler shall not exceed 0.044 gr/dscf corrected to 8% O_2 and, in no case, shall exceed 633.6 lb/day and 26.4 lb/hr (ARM 17.8.1201(10)).

C.3. PM-10 emissions from the No. 5 Recovery Boiler shall not exceed 633.6 lb/day and 26.4 lb/hr (ARM 17.8.1201(10)).

C.4. Total sulfate emissions from the No. 5 Recovery Boiler shall not exceed 633.6 lb/day and 26.4 lb/hr (ARM 17.8.1201(10)).

C.5. Total reduced sulfur emissions from the No. 5 Recovery Boiler shall not exceed 5 ppm corrected to 8% oxygen, 12-hour average (ARM 17.8.1201(10)).

C.6. A TRS CEM is required by state permit and federal regulation for the No. 5 Recovery Boiler (ARM 17.8.1201(10)).

C.7. The monthly average total suspended particulate for the No. 5 Recovery Boiler shall not exceed 384 lb/day (ARM 17.8.1201(10)).

C.8. Smurfit-Stone shall submit for approval to the Department any proposed changes to the correlation equations used to determine particulate mass emissions (ARM 17.8.1201(10)).

C.9. Smurfit-Stone shall not discharge into the outdoor atmosphere emissions from the No. 5 Recovery Boiler that exhibit 20% opacity or greater averaged over 6 consecutive minutes for more than 3% of the 6-minute time periods during which the No. 5 Recovery Boiler is operating within a calendar quarter (ARM 17.8.321).

C.10. A COMS is required by state permit and federal regulations for the No. 5 Recovery Boiler (ARM 17.8.1201(10)).

C.11. Smurfit-Stone shall operate and maintain an ESP on the No. 5 Recovery Boiler (ARM 17.8.1201(10)).

C.12. Smurfit-Stone shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in 40 CFR 60, Subpart BB-Standards of Performance for Kraft Pulp Mills, that includes, but is not limited to, the completion of the quarterly excess emission reports (EERs) (ARM 17.8.340).

Compliance Demonstration

C.13. Smurfit-Stone shall maintain a record of the daily black liquor firing rate for the No. 5 Recovery Boiler to monitor compliance with Section V.C.1.

C.14. Annually, monitoring compliance with the Section V.C.2 through C.4 standards shall be determined by EPA source sampling methods specified in 40 CFR Part 60, Appendix A. PM-10 sampling methods are specified by 40 CFR Part 51, Appendix M or total particulate results may be used as a surrogate for PM-10 if the impinger analysis ("back-half") is included. Smurfit-Stone shall test the No. 5 Recovery Boiler for total particulate and PM-10 at 90% of maximum rated capacity to monitor compliance with Section V.C.2. TRS emissions are determined by continuous monitoring methods specified in 40 CFR Part 60, Appendix B, Performance Specifications, 1 through 6, as applicable to monitor compliance with Section V.C.5. Back half is not required since this is an NSPS source.

If the results from the annual testing are at 80% of the permit limitation or greater, then testing shall occur on a semi-annual basis. After Smurfit-Stone tests' results are below 80% of the permit limitations, then Smurfit-Stone may return to annual testing no later than one year from the last test date.

C.15. The TRS CEM shall conform to federal specifications as required by 40 CFR Part 60, Appendix B, Specification 5, to monitor compliance with Section V.C.5 and C.6.

C.16. Monthly emissions shall be determined by continuous opacity monitoring and the correlation equations to monitor compliance with Section V.C.7.

C.17. Smurfit-Stone shall notify the Department of any proposed changes to the correlation equations used to determine particulate mass emissions to monitor compliance with Section V.C.8.

C.18. Compliance with Section V.C.9 shall be determined with COMS as the primary measure of compliance with the opacity limit, except that 40 CFR Part 60, Appendix A, Method 9, may be used as a measure of compliance when there is reason to believe COMS data is not accurate or when COMS data is unavailable (ARM 17.8.321(15)).

C.19. The COMS shall conform to Performance Specification 1 found in 40 CFR Part 60, Appendix B, to monitor compliance with Section V.C.10. This COMS shall have a span set at 70 percent opacity as required by 40 CFR, Part 60, Appendix B and Subpart BB.

C.20. Smurfit-Stone shall verify the operation and maintenance of the ESP on the No. 5 Recovery Boiler to monitor compliance with Section V.C.11.

C.21. Smurfit-Stone shall maintain compliance in accordance with 40 CFR 60, Subpart BB, to monitor compliance with Section V.C.12.

Recordkeeping

C.22. The record of the daily black liquor firing rate for the No. 5 Recovery Boiler shall be maintained on site and submitted to the Department in the monthly report.

C.23. All test records must be maintained on site and submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual.

C.24. Smurfit-Stone shall operate and maintain the TRS CEM and records shall be submitted to the Department upon request.

C.25. The opacity monitors required to monitor compliance with Section V.C.7 will provide a 24-hour average opacity that will be converted to gr/dscf and then converted to lb/day and lb/day monthly average using the correlation equations. Smurfit-Stone shall maintain a correlation between opacity and particulate emissions (from stack test results) and use this correlation to calculate daily and monthly averages.

C.26. No recordkeeping is necessary to monitor compliance with Section V.C.17 and C.20.

C.27. The COM shall be operated and maintained and records shall be submitted to the Department upon request.

C.28. Smurfit-Stone shall maintain records in accordance with 40 CFR 60, Subpart BB.

Reporting

C.29. Smurfit-Stone shall submit a monthly report to the Department. The monthly report shall include:

a. The daily black liquor firing rate for the No. 5 Recovery Boiler.

b. Smurfit-Stone shall include a report on a 12-hour basis.

c. A monthly average for pounds of sulfur emitted per 1000 pounds of black liquor burned for the No. 5 Recovery Boiler.

d. Monthly average the daily total particulate emissions as determined by the correlation equations for the No. 5 Recovery Boiler. This report shall include daily calculated grain loading (gr/dscf), air flow (dscfm), total particulate (lb/hour), and the 24-hour average opacity. Smurfit-Stone shall report percent O_2 and grain loading (gr/dscf) corrected for O_2.

e. Smurfit-Stone shall report all records of opacity equal to or greater than 20% averaged over 6 consecutive minutes for the No. 5 Recovery Boiler.

C.30. Quarterly, Smurfit-Stone shall submit excess emission reports for the CEM and COM required by NSPS as specified in 40 CFR Part 60.7(c). This report shall include:

a. The magnitude of excess emissions computed in accordance with 60.13(h), any conversion factors used, and the date and time of commencement and completion of each time period of excess emissions.

b. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility; the nature and cause of any malfunction (if known); the corrective action taken or preventative measures adopted.

c. The date and time identifying each period during which the continuous monitoring system was inoperative, except for zero and span checks.

d. When no excess emissions have occurred, or the continuous monitoring systems have been inoperative, such information shall be stated in the report.

e. The excess emission reports shall be completed in a format supplied or approved by the Department.

C.31. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide:

a. A summary of results of the last source testing that was performed;

b. Notification of any proposed changes to the correlation equations;

c. A summary of calculations using the correlation equations to determine particulate mass emissions;

d. A brief summary of previously submitted COM and CEM data; and

e. A verification that the ESP was operated and maintained.

D. No. 3 Smelt Dissolving Tank

EU015 – No. 3 Smelt Dissolving Tank

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
D.1, D.5, D.8, D.10	Opacity	40%	Method 9	As Required by the Department	Semi-annual
D.2, D.6, D.8, D.10	TSP	140 lb/Day 5.83 lb/hr	40 CFR Part 60, Appendix A	Annually	Semi-annual
D.3, D.6, D.8, D.10	PM-10	140 lb/Day 5.83 lb/hr	40 CFR Part 60, Appendix M	Annually	Semi-annual
D.4, D.7, D.9, D.10	Particulate Emissions	Venturi Scrubber	Log Operational Checks	Weekly	Semi-annual

D.1. Smurfit-Stone shall not cause or authorize emissions from the No. 3 Smelt Dissolving Tank to be discharged into the outdoor atmosphere that exhibit an opacity of 40% or greater averaged over 6 consecutive minutes (ARM 17.8.304(1)).

D.2. Total suspended particulate emissions from the No. 3 Smelt Dissolving Tank shall not exceed 140 lb/day and 5.83 lb/hr (ARM 17.8.1201(10)).

D.3. PM-10 emissions from the No. 3 Smelt Dissolving Tank shall not exceed 140 lb/day and 5.83 lb/hr (ARM 17.8.1201(10)).

D.4. Smurfit-Stone shall operate and maintain a wet venturi scrubber on the No. 3 Smelt Dissolving Tank (ARM 17.8.1201(10)).

Compliance Demonstration

D.5. As required by the Department, Smurfit-Stone shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section V.D.1. Each observation period shall be a minimum of 6 minutes unless any one reading is 40% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time (ARM 17.8.105 & 106).

D.6. Annually, monitoring compliance with the above Section V.D.2 and D.3 standards shall be accomplished by EPA source sampling methods specified in 40 CFR Part 60, Appendix A. PM-10 sampling methods are specified by 40 CFR Part 51, Appendix M. Total particulate results may be used as a surrogate for PM-10 if the impinger analysis ("back-half") is included.

D.7. Smurfit-Stone shall perform the following scrubber operational checks on a weekly basis on the smelt tank vents to monitor compliance with Section V.D.4:

a. Scrubber shower water flows;

b. Scrubber pressure differential; and

c. Bypass conditions.

Recordkeeping

D.8. All test records must be maintained on site and submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual.

D.9. Smurfit-Stone shall maintain a log, on site, of the weekly operational checks on the scrubber. The log shall include the information required by Section V.D.7, the date of the check, and the initial's of the observer.

Reporting

D.10. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide:

a. A summary of results of the last source testing that was performed; and

b. A summary of the logged data.

E. No. 4 Smelt Dissolving Tank

EU016 – No. 4 Smelt Dissolving Tank

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
E.1, E.5, E.8, E.10	Opacity	20%	Method 9	As Required by the Department	Semi-annual
E.2, E.6, E.8, E.10	TSP	607 lb/day 25.29 lb/hr	40 CFR Part 60, Appendix A	Annually	Semi-annual
E.3, E.6, E.8, E.10	PM-10	607 lb/day 25.29 lb/hr	40 CFR Part 60, Appendix M	Annually	Semi-annual
E.4, E.7, E.9, E.10	Particulate Emissions	Venturi Scrubber	Log Operational Checks	Weekly	Semi-annual

Conditions

E.1. Smurfit-Stone shall not cause or authorize emissions from the No. 4 Smelt Dissolving Tank to be discharged into the outdoor atmosphere that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(1)).

E.2. Total suspended particulate emissions from the No. 4 Smelt Dissolving Tank shall not exceed 607 lb/day and 25.29 lb/hr (ARM 17.8.1201(10)).

E.3. PM-10 emissions from the No. 4 Smelt Dissolving Tank shall not exceed 607 lb/day and 25.29 lb/hr (ARM 17.8.1201(10)).

E.4. Smurfit-Stone shall operate and maintain a wet venturi scrubber on the No. 4 Smelt Dissolving Tank (ARM 17.8.1201(10)).

Compliance Demonstration

E.5. As required by the Department, Smurfit-Stone shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section V.E.1. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time (ARM 17.8.105 & 106).

E.6. Annually, monitoring compliance with Section V.E.2 and E.3 standards for the No. 4 Smelt Dissolving Tank shall be accomplished by EPA source sampling methods specified in 40 CFR Part 60, Appendix A. PM-10 sampling methods are specified by 40 CFR Part 51, Appendix M. Total particulate results may be used as a surrogate for PM-10 if the impinger analysis ("back-half") is included.

E.7. Smurfit-Stone shall perform the following scrubber operational checks on a weekly basis on the smelt tank vents to monitor compliance with Section V.E.4.

a. Scrubber shower water flows,

b. Scrubber pressure differential, and

c. Bypass conditions.

Recordkeeping

E.8. All test records must be maintained on site and submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual.

E.9. Smurfit-Stone shall maintain a log, on site, of the weekly operational checks on the scrubber. The log shall include the information required by Section V.E.7, the date of the check, and the initial's of the observer.

Reporting

E.10. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide:

a. A summary of results of the last source testing that was performed; and

b. A summary of the logged data.

F. EU017 – No. 5 Smelt Dissolving Tank

EU017 – No. 5 Smelt Dissolving Tank

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
F.1, F.6, F.10, F.13	Opacity	20%	Method 9	As Required by the Department	Semi-annual
F.2, F.7, F.10, F.13	TSP	0.2 lb/ton Black Liquor Processed 120 lb/Day 5.0 lb/hr	40 CFR Part 60, Appendix A	Annually	Semi-annual
F.3, F.7, F.10, F.13	PM-10	120 lb/Day 5.0 lb/hr	40 CFR Part 60 Appendix M	Annually	Semi-annual
F.4, F.8, F.11, F.13	Particulate Emissions	Venturi Scrubber	Log Operational Checks	Weekly	Semi-annual
F.5, F.9, F.12, F.13	No.5 Smelt Dissolving Tank	40 CFR 60, Subpart BB	40 CFR 60, Subpart BB	40 CFR 60, Subpart BB	Semi-annual

Conditions

F.1. Smurfit-Stone shall not cause or authorize emissions from the No. 5 Smelt Dissolving Tank to be discharged into the outdoor atmosphere that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(1)).

F.2. Total suspended particulate emissions from the No. 5 Smelt Dissolving Tank shall be limited to 0.2 lb/ton black liquor processed, but in no case shall it exceed 120 lb/day and 5.0 lb/hr. (ARM 17.8.340 and 40 CFR, Part 60, Subpart BB.).

F.3. PM-10 emissions from the No. 5 Smelt Dissolving Tank shall not exceed 120 lb/day and 5.00 lb/hr (ARM 17.8.1201(10)).

F.4. Smurfit-Stone shall operate and maintain a wet venturi scrubber on the No. 5 Smelt Dissolving Tank (ARM 17.8.1201(10)).

F.5. Smurfit-Stone shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in the 40 CFR 60, Subpart BB-Standards of Performance for Kraft Pulp Mills (ARM 17.8.340).

Compliance Demonstration

F.6. As required by the Department, Smurfit-Stone shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section V.F.1. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 & 106).

F.7. Annually, monitoring compliance with Section V.F.2 and F.3 shall be accomplished by EPA source sampling methods specified in 40 CFR Part 60, Appendix A and Subpart BB. PM-10 sampling methods are specified by 40 CFR Part 51, Appendix M. Total particulate results may be used as a surrogate for PM-10 if the impinger analysis ("back-half") is included.

F.8. Smurfit-Stone shall perform the following scrubber operational checks on a weekly basis on the smelt tank vents to monitor compliance with Section V.F.4.

a. Scrubber shower water flows,

b. Fan is operating; and

c. Check bypass conditions by verifying that the explosion damper is closed.

F.9. Smurfit-Stone shall monitor compliance in accordance with 40 CFR 60, Subpart BB.

Recordkeeping

F.10. All test records must be maintained on site and submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual.

F.11. Smurfit-Stone shall maintain a log on site of the weekly operational checks on the scrubber. The log shall include the information required by Section V.F.7, the date of the check, and the initial's of the observer.

F.12. Smurfit-Stone shall maintain records in accordance with 40 CFR 60, Subpart BB.

Reporting

F.13. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide:

a. A summary of results of the last source testing that was performed; and

b. A summary of the logged data.

G. Multi-fuel Boiler

EU021 – Multi-fuel Boiler

Condition(s)	Pollutant/ Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
G.1, G.19, G.33, G.42	Opacity	20%	Method 9	As Required by the Department	Semi-annual
G.2, G.20, G.34, G.40	Steam Production	Daily Production	Maintain Log	Daily	Monthly
G.3, G.21, G.35, G.42	Dewatered Sludge Consumption	21,900 ton/yr	Maintain a Production Log	Daily Logging	Semi-annual
G.4, G.22, G.33, G.42	Dewatered Sludge	≤ 0.4% Sulfur Content	Sulfur Analysis	Quarterly	Semi-annual
G.5, G.23, G.35, G.42	Multi-fuel Boiler Fuel	Dewatered Sludge from Primary Clarifier	Verification	Ongoing	Semi-annual
G.6, G.23, G.35, G.42	Dewatered Sludge	Thoroughly Blended w/ Existing Hog Fuel	Verification	Ongoing	Semi-annual
G.7, G.24, G.36, G.42	pH of Scrub-ber Water	≥ pH Measured During Last Source Test	pH check	Weekly	Semi-annual
G.8, G.22, G.34, G.42	SO_2	5.70 lb/hr	Dewatered sludge consumption/sulfur content	Daily/ Quarterly	Semi-annual
G.9, G.26, G.30, G.32, G.42	TSP	0.10 lb/MBtu 52.04 lb/hr 1249 lb/Day	40 CFR Part 60, Appendix A	Semi-annual	Semi-annual
G.10, G.25, G.30, G.32, G.42	PM-10	0.10 lb/MBtu 52.04 lb/hr 1249 lb/Day	40 CFR Part 51, Appendix M	Semi-annual	Semi-annual
G.11, G.26, G.37, G.42	SO_2	0.80 lb/MBtu 429.6 lb/hr Firing Liquid Fossil Fuel or Liquid Fossil Fuel & Wood Residue	CEMs	Ongoing	Quarterly
G.12, G.26, G.28, G.37, G.38, G.40, G.42	NO_x	0.30 lb/MBtu 161.1 lb/hr Firing Liquid Fossil Fuel, Liquid Fossil Fuel & Wood Residue, or Gaseous Fossil Fuel & Wood Residue	CEMs	Ongoing	Quarterly
		0.20 lb/MBtu Firing Natural Gas >24 Consecutive Hours	Method 7	As Required by the Department	Semi-annual
G.13, G.26, G.37, G.42	SO_2	CEM	40 CFR 60 Appendix B Specification 2	Ongoing	Semi-annual
G.14, G.26, G.37, G.42	NO_x	CEM	40 CFR 60 Appendix B Specification 2	Ongoing	Semi-annual
G.15, G.27, G.36, G.42	Either Oxygen or Carbon monoxide	CEM	Operate and Maintain in Accordance w/ 40 CFR Part 60.45	Ongoing	Semi-annual
G.16, G.28, G.30, G.32, G.42	SO_2	1.2 lb/Mbtu Firing Solid Fuel or Solid Fuel w/ Wood Residue	Method 8	As Required by the Department	Semi-annual
G.17, G.29, G.38, G.41, G.42	Multi-fuel Boiler	40 CFR 60, Subpart D	40 CFR 60, Subpart D	40 CFR 60, Subpart D	Semi-annual
G.17, G.29, G.38, G.41, G.42	Multi-fuel Boiler	EER	Complete Reports	As Necessary	Quarterly
G.18, G.31, G.39, G.42	Waste Plastic Combustion Rate	15.1 T/Day 468 T/Month 5616 ton/12-month rolling per.	Maintain a Log	Ongoing	Semi-annual

Conditions

G.1. Smurfit-Stone shall not cause or authorize emissions from the Multi-fuel Boiler to be discharged into the outdoor atmosphere that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(1), ARM 17.8.340, and 40 CFR, Part 60, Subpart D).

G.2. Smurfit-Stone shall report, monthly, the daily steam production for the Multi-fuel Boiler (ARM 17.8.1201(10)).

G.3. Consumption of dewatered sludge from the sludge dewatering plant by the Multi-fuel Boiler shall not exceed a total of 21,900 ton/year (ARM 17.8.715).

G.4. Sulfur content of the dewatered sludge used as fuel for the Multi-fuel Boiler shall not exceed 0.4% on an as received basis (ARM 17.8.715).

G.5. Any dewatered sludge used as fuel in the Multi-fuel Boiler shall originate from the primary clarifier (ARM 17.8.710).

G.6. The dewatered sludge shall be thoroughly blended with the existing hog fuel (ARM 17.8.710).

G.7. The pH of the scrubber water on the Multi-fuel Boiler shall be maintained at a level equal to or greater than the pH measured during the last source test demonstrating compliance with the SO_2 emission limit contained in Section V.G.8 (ARM 17.8.710).

G.8. Emissions of SO_2 from the Multi-fuel Boiler shall be limited to 5.70 lb/hr (ARM 17.8.715).

G.9. Total suspended particulate emissions from the Multi-fuel Boiler shall not exceed 0.10 lb/million Btu fired and 52.04 lb/hr and 1249 lb/day (ARM 17.8.340 and 40 CFR, Part 60, Subpart D).

G.10. PM-10 emissions from the Multi-fuel Boiler shall not exceed 1249 lb/day and 52.04 lb/hr and 0.1 lb/million Btu fired (ARM 17.8.1201(10)).

G.11. Sulfur dioxide emissions from the Multi-fuel Boiler shall not exceed 0.80 lb/million Btu and 429.6 lb/hr when firing liquid fossil fuel or liquid fossil fuel and wood residue (ARM 17.8.340 and 40 CFR, Part 60, Subpart D).

G.12. Nitrogen dioxide emissions from the Multi-fuel Boiler shall not exceed 0.30 lb/million Btu and 161.1 lb/hr when firing liquid fossil fuel, liquid fossil fuel and wood residue, or gaseous fossil fuel and wood residue (ARM 17.8.340 and 40 CFR, Part 60, Subpart D). Nitrogen dioxide emissions from the Multi-fuel Boiler shall not exceed 0.20 lb/million Btu when firing natural gas for more than 24 consecutive hours (40 CFR, Part 60, Subpart D).

G.13. A sulfur dioxide CEM is required by federal regulation and state permit when the Multi-fuel Boiler is fired on oil (ARM 17.8.1201(10)).

G.14. A nitrogen oxides CEM is required by federal regulation and state permit for the Multi-fuel Boiler (ARM 17.8.1201(10)).

G.15. Either an oxygen or carbon monoxide CEM is required as provided in 40 CFR Part 60.45 (ARM 17.8.1201(10)).

G.16. Sulfur dioxide emissions from the Multi-fuel Boiler shall not exceed 1.2 lb/million Btu when firing solid fuel or solid fuel with wood residue (40 CFR, Part 60, Subpart D).

G.17. Smurfit-Stone shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in 40 CFR 60, Subpart D-Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971, that includes, but is not limited to, the completion of the quarterly EERs (ARM 17.8.340).

G.18. Smurfit-Stone shall be limited to the waste plastic combustion rate (on a dry basis) of 15.1 ton/day, 468 ton/month, and 5616 tons during any 12-month rolling period (ARM 17.8.1201(10)).

Compliance Demonstration

G.19. As required by the Department, Smurfit-Stone shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section V.G.1. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time (ARM 17.8.105 & 106).

G.20. Smurfit-Stone shall maintain a record of the daily steam production for the Multi-fuel Boiler to monitor compliance with Section V.G.2.

G.21. Smurfit-Stone shall maintain a log of the consumption of dewatered sludge by the Multi-fuel Boiler to monitor compliance with Section V.G.3.

G.22. Quarterly, Smurfit-Stone shall conduct an analysis of the dewatered sludge to monitor compliance with the sulfur limitation contained in Section V.G.4 and V.G.8. Smurfit-Stone does not have to conduct separate analyses for the Multi-fuel Boiler if the sample of the dewatered sludge is taken prior to introduction to the Multi-fuel Boiler.

G.23. Smurfit-Stone shall verify that the only dewatered sludge used as fuel for the Multi-fuel Boiler originated from the primary clarifier and the dewatered sludge is thoroughly blended with existing hog fuel to monitor compliance with Section V.G.5 and G.6.

G.24. Smurfit-Stone shall conduct weekly pH checks on the scrubber to monitor compliance with Section V.G.7.

G.25. Annually, monitoring compliance with Section V.G.9 and G.10 shall be accomplished by EPA source sampling methods specified in 40 CFR Part 60, Appendix A and Subpart D. PM-10 sampling methods are specified by 40 CFR Part 51, Appendix M including back half, except as provided in Appendix E of this permit or total particulate results may be used as a surrogate for PM-10 if the impinger analysis ("back-half") is included. As required by the Department Smurfit-Stone shall also complete chloride testing to monitor compliance when burning waste plastic.

G.26. The nitrogen oxides and sulfur dioxide CEMs shall conform to federal specifications as required by Specification 2, 40 CFR Part 60, Appendix B, to monitor compliance with Section V.G.11, G.12, G.13, and G.14.

G.27. Smurfit-Stone shall verify that either the oxygen or carbon monoxide CEM is operated and maintained in accordance with 40 CFR Part 60.45 to monitor compliance with Section V.G.15.

G.28. As required by the Department, Smurfit-Stone shall conduct Method 8 and Method 7 source tests to monitor compliance with Section V.G.16 and G.12.

G.29. Smurfit-Stone shall maintain compliance as required by 40 CFR 60, Subpart D, to monitor compliance with Section V.G.17.

G.30. Semi-annually, Smurfit-Stone shall conduct a test in accordance with 40 CFR Part 60, Appendix A on the Multi-fuel Boiler at 90% of maximum rated capacity to monitor compliance with Section V.G.7 and G.9.

G.31. Smurfit-Stone shall maintain a log of the amount of waste plastic that is transported to the hog fuel pile on a daily basis. By the 25th of each month, Smurfit-Stone shall add up the total waste plastic material that has been transported to the hog fuel pile during the previous 12 months to monitor compliance with Section V.G.18.

Recordkeeping

G.32. All test and analyses records must be maintained on site and submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual.

G.33. Smurfit-Stone shall record the daily steam production for the Multi-fuel Boiler. The daily steam production shall be maintained on site and submitted to the Department in the monthly report.

G.34. Smurfit-Stone shall maintain a log that includes the daily consumption of dewatered sludge off the press, the date and time, and the recorder's initials.

G.35. No recordkeeping is necessary to monitor compliance with Section V.G.23 and G.26.

G.36. Smurfit-Stone shall maintain a log of the pH checks that include the date and time, and the recorder's initials.

G.37. Smurfit-Stone shall maintain the records for the CEMs on site and submit them to the Department in accordance with Specification 2, 40 CFR Part 60, Appendix B, and 40 CFR Part 60.45.

G.38. Smurfit-Stone shall maintain records in accordance with 40 CFR 60, Subpart D.

G.39. The log of the waste plastic as required by Section V.G.30 shall be maintained on site and submitted to the Department upon request.

Reporting

G.40. Smurfit-Stone shall submit a monthly report to the Department. The monthly report shall include:

a. The daily steam production for the Multi-fuel Boiler; and

b. The 3-hour averages for SO_2 and NO_x (as lb/MMBtu) as specified by federal regulations for the Multi-fuel Boiler.

G.41. Quarterly, Smurfit-Stone shall submit excess emission reports for NO_x and SO_2 continuous emission monitors required by NSPS as specified in 40 CFR Part 60.7(c). This report shall include:

a. The magnitude of excess emissions computed in accordance with 60.13(h), any conversion factors used, and the date and time of commencement and completion of each time period of excess emissions.

b. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility; the nature and cause of any malfunction (if known); the corrective action taken or preventative measures adopted.

c. The date and time identifying each period during which the continuous monitoring system was inoperative, except for zero and span checks.

d. When no excess emissions have occurred, or the continuous monitoring systems have been inoperative, such information shall be stated in the report.

e. The excess emission reports shall be completed in a format supplied or approved by the Department.

G.42. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semi-annual reporting shall provide:

a. A summary of results of the last source testing that was performed;

b. A summary of the log of consumption of dewatered sludge;

c. Verification that any dewatered sludge burned was taken from the primary clarifier and the dewatered sludge was thoroughly blended with existing hog fuel;

d. Verification that the either the oxygen or carbon monoxide CEM was operated and maintained in accordance with 40 CFR Part 60.45;

e. A summary of the CEM data and any reports completed in accordance with Specification 2, 40 CFR Part 60, Appendix B, and 40 CFR Part 60.45; and

f. A summary of the waste plastic log.

H. Coke Handling

EU 108 – Coke Handling

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
H.1, H.3, H.5, H.6, H.8	Fugitive Dust	Reasonably Available Control Technology	Install and Operate	As Necessary	Semi-annual
H.2, H.4, H.5, H.7, H.8	Opacity	20%	Method 9	To be Determined	Semi-annual

Conditions

H.1. Smurfit-Stone shall use reasonably available control technology to control fugitive dust on the coke unloading, storage, and handling system (ARM 17.8.1201(10)).

H.2. Smurfit-Stone shall not cause or authorize the production, handling, transportation, or storage of any material unless reasonable precautions to control emissions of particulate matter are taken. Such emissions of airborne particulate matter from any stationary source shall not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.308(1)).

Compliance Demonstration

H.3. Smurfit-Stone shall log the reasonably available control technologies that are used to control fugitives to monitor compliance with Section V.H.1.

H.4. Smurfit-Stone shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section V.H.2. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater, then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time (ARM 17.8.105 & 106).

H.5. Smurfit-Stone shall notify the Department when coke will be burned. The frequency of testing shall be determined at the time operations begin.

Recordkeeping

H.6. Smurfit-Stone shall maintain the log on site. The log shall include the technologies used, the date the technology was utilized, and the observer's initials.

H.7. All test records must be maintained on site and submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual.

Reporting

H.8. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide:

a. A summary of the technologies used to control fugitive emissions; and

b. A summary of results of the source testing that was performed or a statement that the coke has not been burned during the previous 6 months.

I. Lime Kilns

EU011 – No. 1 Lime Kiln
EU012 – No. 2 Lime Kiln
EU013 – No. 3 Lime Kiln
EU014 – No. 4 Lime Kiln

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
I.1, I.23, I.31, I.38	Opacity	40%	Method 9	As Required by the Department	Semi-annual
I.2, I.23, I.31, I.38	Opacity	20%	Method 9	As Required by the Department	Semi-annual
I.3, I.24, I.30, I.31, I.38	No. 1 Lime Kiln TSP	288 lb/Day 12.0 lb/hr	40 CFR 60, Appendix A & 40 CFR 51, Appendix M	Annually	Semi-annual
I.4, I.24, I.31, I.38	No. 1 Lime Kiln PM-10	288 lb/Day 12.0 lb/hr			
I.5, I.24, I.31, I.38	No. 1 Lime Kiln Total Sulfate	259 lb/Day 10.79 lb/hr			
I.6, I.24, I.31, I.33, I.36, I.37	No. 1 Lime Kiln Total Reduced Sulfur	≤20 ppm 24-hr Average	CEM	Ongoing w/ 24-hr Averages	Semi-annual
I.7, I.24, I.30, I.31, I.38	No. 2 Lime Kiln TSP	266 lb/Day 11.08 lb/hr	40 CFR 60, Appendix A & 40 CFR 51, Appendix M	Annually	Semi-annual
I.8, I.24, I.31, I.38	No. 2 Lime Kiln PM-10	266 lb/Day 11.08 lb/hr			
I.9, I.24, I.31, I.38	No. 2 Lime Kiln Total Sulfate	239 lb/Day 9.96 lb/hr			
I.10, I.24, I.31, I.33, I.36, I.38	No. 2 Lime Kiln Total Reduced Sulfur	≤20 ppm 24-hr Average	CEM	Ongoing w/ 24-hr Averages	Semi-annual
I.11, I.24, I.30, I.31, I.38	No. 3 Lime Kiln TSP	359 lb/Day 14.96 lb/hr	40 CFR 60, Appendix A & 40 CFR 51, Appendix M	Annually	Semi-annual
I.12, I.24, I.31, I.38	No. 3 Lime Kiln PM-10	359 lb/Day 14.96 lb/hr			
I.13, I.24, I.31, I.38	No. 3 Lime Kiln Total Sulfate	323 lb/Day 13.46 lb/hr			
I.14, I.24, I.31, I.33, I.36, I.38	No. 3 Lime Kiln Total Reduced Sulfur	≤20 ppm 24-hr Average	CEM	Ongoing w/ 24-hr Averages	Semi-annual
I.15, I.25, I.30, I.31, I.38	No. 4 Lime Kiln TSP	0.067 gr/dscf Corrected to 10% O_2 204.0 lb/Day 8.50 lb/hr	40 CFR 60, Appendix A & 40 CFR 51, Appendix M & 40 CFR 60, Subpart BB	Annually	Semi-annual
I.16, I.25, I.31, I.38	No. 4 Lime Kiln PM-10	204.0 lb/Day 8.50 lb/hr			
I.17, I.25, I.31, I.38	No. 4 Lime Kiln Total Sulfate	204 lb/Day 8.50 lb/hr			
I.18, I.25, I.31, I.33, I.36, I.38	No. 4 Lime Kiln Total Reduced Sulfur	≤8.0 ppm 12-hr Average	CEM	Ongoing w/ 12-hr Averages	Semi-annual
I.19, I.27, I.33, I.37	TRS – No. 1, 2, & 3 Lime Kilns	CEM by State Permit	Operate and Maintain	Ongoing	Semi-annual

I.20, I.28, I.34, I.38	TRS – No. 4 Lime Kiln	CEM by State Permit & Federal Regulation	Operate and Maintain in Accordance w/ 40 CFR 60, Appendix B Specification 5	Ongoing	Semi-annual
I.21, I.29, I.35, I.38	No.4 Lime Kiln	40 CFR 60, Subpart BB	40 CFR 60, Subpart BB	40 CFR 60, Subpart BB	Semi-annual
I.21, I.29 I.35, I.37, I.38	No. 4 Lime Kiln	EER	Complete Reports	As Necessary	Quarterly
I.22, I.26, I.32, I.38	All Four Lime Kilns	Venturi Scrubbers	Operational Checks	Weekly	Monthly

Conditions

I.1. Smurfit-Stone shall not cause or authorize emissions from each of the No. 1, 2, and 3 Lime Kilns to be discharged into the outdoor atmosphere that exhibit an opacity of 40% or greater averaged over 6 consecutive minutes (ARM 17.8.304(1)).

I.2. Smurfit-Stone shall not cause or authorize emissions from the No. 4 Lime Kiln to be discharged into the outdoor atmosphere that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2), ARM 17.8.340, and 40 CFR, Part 60, Subpart D.).

I.3. Total suspended particulate emissions from the No. 1 Lime Kiln shall not exceed 288 lb/day and 12.0 lb/hr (ARM 17.8.1201(10)).

I.4. PM-10 emissions from the No. 1 Lime Kiln shall not exceed 288 lb/day and 12.0 lb/hr (ARM 17.8.1201(10)).

I.5. Total sulfate emissions from the No. 1 Lime Kiln shall not exceed 259 lb/day and 10.79 lb/hr (ARM 17.8.1201(10)).

I.6. Total reduced sulfur emissions from the No. 1 Lime Kiln shall not exceed 20 ppm, 24-hour average (ARM 17.8.1201(10)).

I.7. Total suspended particulate emissions from the No. 2 Lime Kiln shall not exceed 266 lb/day and 11.08 lb/hr (ARM 17.8.1201(10)).

I.8. PM-10 emissions from the No. 2 Lime Kiln shall not exceed 266 lb/day and 11.08 lb/hr (ARM 17.8.1201(10)).

I.9. Total sulfate emissions from the No. 2 Lime Kiln shall not exceed 239 lb/day and 9.96 lb/hr (ARM 17.8.1201(10)).

I.10. Total reduced sulfur emissions from the No. 2 Lime Kiln shall not exceed 20 ppm, 24-hour average (ARM 17.8.1201(10)).

I.11. Total suspended particulate emissions from the No. 3 Lime Kiln shall not exceed 359 lb/day and 14.96 lb/hr (ARM 17.8.1201(10)).

I.12. PM-10 emissions from the No. 3 Lime Kiln shall not exceed 359 lb/day and 14.96 lb/hr (ARM 17.8.1201(10)).

I.13. Total sulfate emissions from the No. 3 Lime Kiln shall not exceed 323 lb/day and 13.46 lb/hr (ARM 17.8.1201(10)).

I.14. Total reduced sulfur emissions from the No. 3 Lime Kiln shall not exceed 20 ppm, 24-hour average (ARM 17.8.1201(10)).

I.15. Total suspended particulate emissions from the No. 4 Lime Kiln shall be limited to 0.067 gr/dscf corrected to 10 percent oxygen, but in no case shall it exceed 204.0 lb/day and 8.50 lb/hr. The analysis for the coke conversion shows no increase in particulate emissions from this source (ARM 17.8.340 and 40 CFR, Part 60, Subpart BB.).

I.16. PM-10 emissions from the No. 4 Lime Kiln shall not exceed 204.0 lb/day and 8.50 lb/hr (ARM 17.8.1201(10)).

I.17. Total sulfate emissions from the No. 4 Lime Kiln shall not exceed 204.0 lb/day and 8.50 lb/hr (ARM 17.8.1201(10)).

I.18. Total reduced sulfur emissions from the No. 4 Lime Kiln shall not exceed 8.0 ppm corrected to 10% oxygen, 12-hour average (ARM 17.8.1201(10)).

I.19. A TRS CEM is required by state permit for the No. 1, No. 2, and No. 3 Lime Kilns (ARM 17.8.1201(10)).

I.20. A TRS CEM is required by state permit and federal regulations for the No. 4 Lime Kiln (ARM 17.8.1201(10)).

I.21. Smurfit-Stone shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in the New Source Performance Standards for, as appropriate: 40 CFR 60, Subpart BB-Standards of Performance for Kraft Pulp Mills as it applies to the No. 4 Lime Kiln, which includes but is not limited to the completion of the quarterly EERs (ARM 17.8.340).

I.22. Smurfit-Stone shall operate and maintain a wet venturi scrubber on each of the four lime kilns (ARM 17.8.1201(10)).

Compliance Demonstration

I.23. As required by the Department, Smurfit-Stone shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section V.I.1 and I.2. Each observation period shall be a minimum of 6 minutes unless any one reading is 40% or 20% or greater, whichever is applicable; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 & 106).

I.24. Annually, monitoring compliance with the above Section V.I.3- I.5, I.7-I.9, and I.11-I-13 standards shall be accomplished by EPA source sampling methods specified in 40 CFR Part 60, Appendix A, including back-half particulate. PM-10 sampling methods are specified by 40 CFR Part 51, Appendix M, including back-half particulate. Total particulate results may be used as a surrogate for PM-10 if the impinger analysis ("back-half") is included. TRS emissions are determined by continuous monitoring with 24-hour averages to monitor compliance with Section V.I.6, I.10, and I.14.

I.25. Annually, monitoring compliance with the Section V.I.15 through I.18 standards shall be accomplished by EPA source sampling methods specified in 40 CFR Part 60, Appendix A and Subpart BB. PM-10 sampling methods are specified by 40 CFR Part 51, Appendix M. Total particulate results may be used as a surrogate for PM-10 if the impinger analysis ("back-half") is included. TRS emissions are determined by continuous monitoring, with 12-hour averages.

I.26. Smurfit-Stone shall perform the following scrubber operational checks on a weekly basis on each of the lime kilns to monitor compliance with Section V.I.22.

a. Scrubber liquid supply flow;

b. Scrubber water solids; and

c. Scrubber pressure differential.

I.27. The TRS CEM required by Section V.I.19 is not required to conform to federal specifications. Smurfit-Stone already has Barton titrators in place on the No. 1 and No. 2 Lime Kiln and a modified Astech on the No. 3 Lime Kiln, or another monitor approved by the Department to fulfill this requirement. These monitors do not meet federal specifications; however, they are sufficient to monitor this pollutant at this time.

I.28. The TRS CEM required by Section V.I.20 shall conform to federal specifications as required by 40 CFR Part 60, Appendix B, Specification 5.

I.29. Smurfit-Stone shall monitor compliance as required by 40 CFR 60, Subpart BB.

I.30. Annually, Smurfit-Stone shall conduct a Method 5 test on each of the lime kilns for particulate emissions and include the results with the monthly report in which the test was completed to monitor compliance with Section V.I.3, I.7, I.11, and I.15. Total particulate results may be used as a surrogate for PM-10 if the impinger analysis ("back-half") is included.

Recordkeeping

I.31. All test records and analyses must be maintained on site and submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual.

I.32. Smurfit-Stone shall maintain a log, on site, of the weekly operational checks on the scrubber. The log shall include the information required by Section V.I.26, the date of the check, and the initial's of the observer.

I.33. Smurfit-Stone shall report, monthly, the daily average TRS for the No. 1, No. 2 and No. 3 Lime Kilns. Smurfit-Stone shall include, for the No. 4 Lime Kiln, a report of 12-hour averages.

I.34. Smurfit-Stone shall maintain the records for the CEMs on site and submit them to the Department in accordance with 40 CFR Part 60, Appendix B, Specification 5.

I.35. Smurfit-Stone shall maintain records in accordance with 40 CFR 60, Subpart BB.

Reporting

I.36. Smurfit-Stone shall submit a monthly report to the Department. The monthly report shall include the daily average TRS concentrations on the No.1, No.2, and No. 3 Lime Kilns. Smurfit-Stone shall include a report on a 12-hour basis for the No. 4 Lime Kiln. Smurfit-Stone shall also include the number of hours the corresponding piece of equipment was down or malfunctioning.

I.37. Quarterly, Smurfit-Stone shall submit excess emission report for the No 4 Lime Kiln TRS continuous emission monitor required by NSPS as specified in 40 CFR Part 60.7(c). This report shall include:

a. The magnitude of excess emissions computed in accordance with 60.13(h), any conversion factors used, and the date and time of commencement and completion of each time period of excess emissions.

b. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility; the nature and cause of any malfunction (if known); the corrective action taken or preventative measures adopted.

c. The date and time identifying each period during that the continuous monitoring system was inoperative, except for zero and span checks.

d. When no excess emissions have occurred, or the continuous monitoring systems have been inoperative, such information shall be stated in the report.

e. The excess emission reports shall be completed in a format supplied or approved by the Department.

I.38. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide a summary of results of the last source testing that was performed.

Alternative Operating Scenario for Pet Coke

The following conditions, compliance demonstrations, recordkeeping and reporting requirements shall be followed when Smurfit-Stone is burning petroleum coke.

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
I.39, I.48, I.50, I.54, I.58	NO_x for All Four Kilns	408 Ton/yr	40 CFR 60, Appendix A & Equations	Annually	Semi-annual
I.40, I.49, I.55, I.58	Coke	Coke Analysis	Conduct Analysis	Semi-annually	Semi-annual
I.41, I.42, I.53, I.52, I.56, I.58	Burning Coke	Air Monitoring Network	Montana and EPA Quality Assurance Manuals	Within 90 Days of Start Burning Coke	Monthly When Operating
I.43, I.46, I.51, I.54, I.58	Air Monitoring Network Siting	Committee	Committee Meetings	As Necessary	Semi-annual
I.44, I.51, I.54, I.58	Air Monitoring Network	Operation at Least Four Consecutive Quarters	Committee Review of Changes	As Necessary	Semi-annual
I.45, I.51, I.54, I.58	Air Monitoring Network	Proposed Changes	Departmental Approval	As Necessary	Semi-annual
I.47, I.53, I.57, I.58	Fuel Change	80% Petroleum Coke Burning	40 CFR 60, Appendix A	Annually	Semi-annual

Conditions

I.39. Nitrogen oxide emissions shall not exceed 408 ton/year from all four lime kilns (ARM 17.8.1201(10)).

I.40. Smurfit-Stone shall provide the Department with a current analysis of the coke used in the kilns (ARM 17.8.1201(10)).

I.41. Smurfit-Stone Container shall install, operate and maintain one ambient air monitoring site in the vicinity of its kraft pulp and linerBoard facility. The monitoring site shall consist of all equipment, supplies, and personnel resources necessary and sufficient to monitor nitrogen dioxide levels in the ambient air in accordance with the procedures contained in this permit (ARM 17.8.1201(10)).

I.42. Smurfit-Stone shall commence air monitoring within 90 days after the start of burning petroleum coke in each of the four lime kilns (ARM 17.8.1201(10)).

I.43. For purposes of choosing an applicable site location, the Department, in conjunction with Smurfit-Stone, the Missoula City-County Health Department, and interested citizens, shall form an ad hoc ambient air quality monitoring committee. The committee shall consist of the following members (ARM 17.8.1201(10)):

Smurfit-Stone Container	-	1 member
Missoula City-County Health Dept.	-	1 member
Department	-	1 member
Interested Citizens	-	2 members and 2 alternates

Each organization shall choose their respective committee member, except that the Department shall choose the citizen members from a list of names of persons expressing interest in this subject. The Department shall serve as chair for the committee.

I.44. The ambient air quality monitoring of nitrogen dioxide will continue for at least four consecutive quarters after the applicable lime kiln has been converted to coke and a maximum burn rate has been established. Following the successful gathering of four consecutive quarters of valid ambient air quality data collected in accordance with the requirements of Section V.I.56 below, the committee shall review the data and make a determination of whether or not to continue monitoring the effects of the coke conversion project or otherwise increase or decrease the network size. The committee's decision of whether or not to increase, decrease, or alter the network configuration in order to measure the impact of the coke conversion project will be based upon the nitrogen dioxide ambient monitoring results as they relate to potential damage to human health, vegetation, animals, or otherwise threaten compliance with the ambient air quality standards. In the event a consensus cannot be reached by the committee, the Department shall determine any future ambient air quality monitoring for nitrogen dioxide. (ARM 17.8.1201(10))

I.45. Any changes in the ambient monitoring network not related to site location and duration of monitoring must be approved in writing by the Department. The Department shall notify the committee of any approved changes to the monitoring network. (ARM 17.8.1201(10))

I.46. The committee may choose to develop a more comprehensive monitoring plan of the effects of the coke conversion project relating to vegetation and animal monitoring. None of the members of the committee, however, are bound to supply financial or other resources for completing these plans. As funding allows, it is the intent of the Department that such a plan be a cooperative effort between the Department, Smurfit-Stone, Missoula City-County Health Department, the University of Montana, and any other citizen or professional resources in the Missoula Valley. (ARM 17.8.1201(10))

I.47. Smurfit-Stone shall be limited to a maximum of 80% petroleum coke substitution for natural gas used in each kiln prior to issuance of Permit #2344. Also, each kiln shall be equipped with a stack which has safe access to the test ports and which meets the criteria of 40 CFR, Appendix A, Method 1. (ARM 17.8.1201(10))

Compliance Demonstration

I.48. Compliance with Section V.I.39 shall be determined by conducting stack testing in accordance with the frequency specified in Section V.I.50. Compliance with this limitation shall be deemed achieved provided the results of all stack sampling conducted within any calendar year do not exceed any of the values provided below.

Kiln #1: $(X + 7.63/N^{1/2})(0.69)$
Kiln #2: $(X + 7.63/N^{1/2})(0.68)$
Kiln #3: $(X + 7.63/N^{1/2})(1.25)$
Kiln #4: $(X + 7.63/N^{1/2})$ (Units are pounds per hour.)

Where: N = number of stack tests or hourly readings obtained in the subject calendar year as presented below.

X = (Coke %)(.26) + 4.9 (Coke % is measured on a BTU basis.)

The value of N shall be determined as follows:

a. For stack tests conducted in accordance with 40 CFR Part 60, Appendix A, Method 7, N shall equal three for each completed test (not the same as runs). A minimum of two tests is required.

b. For stack tests conducted using continuous emission sampling devices (such as that conducted in support of this application), N shall equal the number of valid hourly samples. The minimum number of samples required for each applicable kiln shall be 50. Average coke feed rate during the testing period shall not be less than 5 percentage points than the average coke feed rate in use by Smurfit-Stone over the preceding 3 months. Average coke feed rate shall be calculated on a percent-BTU basis excluding all time periods in which coke was not a fuel to the lime kiln in question.

I.49. Semi-annually, Smurfit-Stone shall conduct a current analysis of the coke used in the kilns to monitor compliance with Section V.I.40.

I.50. An annual stack test at Kiln #4 shall be conducted to monitor compliance with Section V.I.39 of this section and to otherwise inventory the emissions from this source. Kilns #1, #2 and #3 only need be tested once following conversion to coke. The test required by this section shall also include an analysis of sulfur dioxide and carbon monoxide and be performed according to the applicable EPA test methods as specified in 40 CFR Part 60, Appendix A. In the case of carbon monoxide, however, Smurfit-Stone may conduct this test using the ORSAT method. Alternative equivalent methods to 40 CFR Part 60, Appendix A, may be used only upon written approval by the Department.

I.51. The purpose of the monitoring committee in Section V.I.43 above is to choose the ambient air quality monitoring site for the continuous measurement of nitrogen dioxide. The chosen monitoring site must meet the minimum quality assurance requirements found in the Montana Quality Assurance Manual, including siting criteria. The site must also have adequate access and power requirements within a reasonable distance of the proposed monitoring station. In the event a consensus on site selection cannot be reached, the Department shall determine the final site location. The monitoring site must remain in the same location for at least four consecutive quarters. It may be moved following four consecutive quarters in accordance with Section V.I.45.

I.52. Smurfit-Stone shall utilize air monitoring and quality assurance procedures which equal or exceed the requirements described in the Montana Quality Assurance Manual, including revisions; the EPA quality assurance manual, including revisions; 40 CFR Parts 53 and 58; and any other requirements specified by the Department. These requirements extend to all aspects of air monitoring, including, but not limited to, siting criteria, shelter design, equipment selection, calibration, maintenance, repair, zero/span procedures, precision, accuracy, data handling, control limits, and data validation.

I.53. For all stack tests, a pretest conference shall be held at least 30 days prior to the test between Smurfit-Stone, the tester and the Department. The Department may require a written testing protocol, including quality assurance procedures, prior to the pretest conference.

Smurfit-Stone shall discontinue the burning of coke within 12 hours of being notified by the Missoula City-County Health Department that a Stage II, III or IV Alert is in progress within the air stagnation zone. Smurfit-Stone may resume using coke as soon thereafter as the alert has been canceled.

Smurfit-Stone shall discontinue the burning of coke as soon as reasonably possible, but not more than 1 hour, when a malfunction of the kiln or scrubber occurs, provided such a malfunction has the potential to increase emissions of sulfur dioxide into the outdoor atmosphere.

Recordkeeping

I.54. Smurfit-Stone shall maintain records in accordance with Section V.I.50 and I.51.

I.55. The semi-annual coke analysis report shall contain the heat content of the coke in BTU/lb and the concentration of the following parameters: fixed carbon, volatiles, sulfur, ash, vanadium, beryllium, cadmium, mercury, nickel and lead. A change to any other type of fuel, which increases any air pollution emissions, is subject to the new source review requirements in accordance with ARM 17.8.701, *et seq.,* and/or ARM 17.8.801, *et seq.* This report is due by July 15 each year. No report is required for 1987.

I.56. Smurfit-Stone shall submit monthly data reports to the Department within 45 days after the end of each month and an annual data report within 90 days after the end of the calendar year. Smurfit-Stone may, at their discretion, submit required data from the existing monitoring network at the same intervals and reporting requirements specified in this section.

a. The monthly report shall consist of a narrative data summary. The monthly report to the Department must also consist of a data submittal of all data points on SAROAD format on floppy diskettes that are compatible with the Department's computer system. The narrative data summary shall include:

i. The first and second highest 24-hour concentrations for nitrogen dioxide;
ii. The first and second highest 1-hour concentrations for nitrogen dioxide;
iii. The monthly wind roses (from Smurfit-Stone's site #1);
iv. A summary of the data collection efficiency;
v. A summary of the reasons for missing data;
vi. A precision and accuracy summary; and
vii. Calibration information.

b. The annual report shall consist of a narrative data summary containing:

i. A pollution trend analysis;
ii. The annual means, first and second highest 24-hour concentrations, first and second highest 1-hour concentrations for nitrogen dioxide at each site;
iii. The annual wind roses from each site;
iv. An annual summary of data collection efficiency;
v. An annual summary of precision and accuracy data;
vi. An annual summary of any ambient standard exceedances; and
vii. Recommendations for future monitoring.

I.57. No recordkeeping is necessary to monitor compliance with Section V.I.53.

Reporting

I.58. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide:

a. A summary of results of the last source testing that was performed;

b. A summary of the last coke analysis completed; and

c. A summary of the data maintained as required by Section V.I.56.

J. Lime Slakers

EU018 – No. 1 Lime Slaker
EU019 – No. 2 Lime Slaker
EU020 – No.3. Lime Slaker
EU039 – Salt Cake/Lime Unloading

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
J.1, J.10, J.14, J.16	Opacity	40%	Method 9	As Required by the Department	Semi-annual
J.2, J.10, J.14, J.16	Opacity	20%	Method 9	As Required by the Department	Semi-annual
J.3, J.11, J.14, J.16	No. 1 Lime Slaker TSP	110 lb/Day 4.58 lb/hr	40 CFR 60, Appendix A & 40 CFR 51, Appendix M	Annually	Semi-annual
J.4, J.11, J.14, J.16	No. 1 Lime Slaker PM-10	110 lb/Day 4.58 lb/hr			
J.5, J.12, J.14, J.16	No. 2 Lime Slaker TSP	146 lb/Day 6.08 lb/hr	40 CFR 60, Appendix A & 40 CFR 51, Appendix M	As Required by the Department	Semi-annual
J.6, J.12, J.14, J.16	No. 2 Lime Slaker PM-10	146 lb/Day 6.08 lb/hr			
J.7, J.11, J.14, J.16	No. 3 Lime Slaker TSP	72 lb/Day 3.00 lb/hr	40 CFR 60L Appendix A & 40 CFR 51L Appendix M	Annually	Semi-annual
J.8, J.11, J.14, J.16	No. 3 Lime Slaker PM-10	72 lb/Day 3.00 lb/hr			
J.9, J.13, J.15, J.16	Salt Cake/Lime Handling	Baghouse	Operate and Maintain	Ongoing	Semi-annual

Conditions

J.1. Smurfit-Stone shall not cause or authorize emissions from the No. 1 Lime Slaker to be discharged into the outdoor atmosphere that exhibit an opacity of 40% or greater averaged over 6 consecutive minutes (ARM 17.8.304(1)).

J.2. Smurfit-Stone shall not cause or authorize emissions from the No. 2 and No. 3 Lime Slakers, Salt Cake/Lime Unloading to be discharged into the outdoor atmosphere that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).

J.3. Total suspended particulate emissions from the No. 1 Lime Slaker shall not exceed 110 lb/day and 4.58 lb/hr (ARM 17.8.1201(10)).

J.4. PM-10 emissions from the No. 1 Lime Slaker shall not exceed 110 lb/day and 4.58 lb/hr (ARM 17.8.1201(10)).

J.5. Total suspended particulate emissions from the No. 2 Lime Slaker shall not exceed 146 lb/day and 6.08 lb/hr (ARM 17.8.715).

J.6. PM-10 emissions from the No. 2 Lime Slaker shall not exceed 146 lb/day and 6.08 lb/hr (ARM 17.8.715).

J.7. Total suspended particulate emissions from the No. 3 Lime Slaker shall not exceed 72 lb/day and 3.00 lb/hr (ARM 17.8.1201(10)).

J.8. PM-10 emissions from the No. 3 Lime Slaker shall not exceed 72 lb/day and 3.00 lb/hr (ARM 17.8.1201(10)).

J.9. Smurfit-Stone shall operate and maintain a baghouse on the salt cake/lime unloading. (ARM 17.8.1201(10))

Compliance Demonstration

J.10. As required by the Department, Smurfit-Stone shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section V.J.1 and J.2. Each observation period shall be a minimum of 6 minutes unless any one reading is 40% or 20% or greater, whichever is applicable; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 & 106).

J.11. Annually, monitoring compliance with the above Section V.J.3, J.4, J.7 and J.8 standards shall be accomplished by EPA source sampling methods specified in 40 CFR Part 60, Appendix A. PM-10 sampling methods are specified by 40 CFR Part 51, Appendix M. Total particulate results may be used as a surrogate for PM-10 if the impinger analysis ("back-half") is included.

J.12. As required by the Department, monitoring compliance with the above Section V.J.5 and J.6 standards shall be accomplished by EPA source sampling methods specified in 40 CFR Part 60, Appendix A. PM-10 sampling methods are specified by 40 CFR Part 51, Appendix M. Total particulate results may be used as a surrogate for PM-10 if the impinger analysis ("back-half") is included.

J.13. Verification of ongoing operation and maintenance of the baghouse will monitor compliance with Section V.J.9.

Recordkeeping

J.14. All test records must be maintained on site and submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual.

J.15. No recordkeeping is necessary to monitor compliance with the ongoing operation of the baghouse.

Reporting

J.16. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide a summary of results of the last source testing that was performed and verification that the baghouse was operated on an ongoing basis.

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K. Condensate Collection (40 CFR 63, Subpart S)

EU109 – Condensate Collection
EU109a – No. 1 and No. 2 Evaporators (Foul Condensate)
EU109b – No. 3 Evaporator (Combined Condensate)
EU109c – No. 3 Evaporator (Foul Condensate)
EU109d – No. 4 Evaporator (Condensate from Effect No. 2)
EU109e - No. 4 Evaporator (Foul Condensate)
EU109f - No. 2 Concentrator/No. 5 Evaporator (Foul Condensate)
EU109g - No. 1 Concentrator (Foul Condensate)
EU109h - Turpentine Decanter (Condensate)
EU109i - Batch Digester Blow Heat Recovery System - (Condensate from Accumulator Secondary Condenser)
EU109j - LVHC-NCG Line Drains
EU109k - Foul Condensate Tank
EU109l - Black Liquor Spill Tank No. 1

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
K.1, K.3, K.6, K.8	Digester Production	Condensate Collection 7.2 lb MeOH/ODT Pulp	Batch - # of Blows * ODT Pulp/Blow	Daily	Semi-annual
			Rotation in rpm*ODT Pulp/Rotation		
K.2, K.4, K.5, K.7, K.8	Mass MeOH in Collected Specified Condensate	Collect via closed drain system 7.2 lb MeOH/ODT Pulp	Initial Test – NCASI 94.03 Direct Injection Test Methods for Methanol	60-Day Initial Test & Every 5-Years & 60-Day Rolling Average	Semi-annual
		Closed Drain System	Visual Inspection	Each Calendar Month	Semi-annual

Conditions

K.1. Smurfit-Stone shall measure the mill-wide batch and continuous digester production as oven-dried tons of pulp per day (40 CFR 63.446(c)(3)).

K.2. Smurfit-Stone shall collect in a closed drain system sufficient condensate from the specified sources above, so that the combined condensates from the specified sources shall contain at least 7.2 lbs methanol per oven dried ton pulp (MeOH/ODTP) on a 60 day rolling average (40 CFR 63.446(c)(3), (d)).

Compliance Demonstration

K.3. Smurfit-Stone shall calculate the batch digester's daily production by multiplying the number of blows by oven-dried tons of pulp per blow. Smurfit-Stone shall calculate the daily continuous digester's production by multiplying rotation in rpms by oven-dried tons of pulp per rotation to monitor compliance with Section V.K.1.

K.4. Smurfit-Stone shall visually inspect the closed drain system's integrity at least once each calendar month for leaks to monitor compliance with Section V.K.2 (40 CFR 63.453).

K.5. Smurfit-Stone has performed an initial 60-day test to determine condensate flow and, using the NCASI 94.03 direct injection test method for methanol, the concentration and mass of methanol in the collected condensate. The collected test data will be used to develop methanol collection factors. Smurfit-Stone shall do a subsequent test once every five years to verify or revise the methanol collection factors as appropriate. Smurfit-Stone shall determine the methanol collected on a 60-day rolling average to monitor compliance with Section V.K.2 using the methanol collection factors from the initial or subsequent tests.

Recordkeeping

K.6. Smurfit-Stone shall maintain the calculations, on site, of the digesters production and the mass of methanol and the methanol collection factors as required by Section V.K3 and K.5. The calculations shall be submitted to the Department upon request

K.7. Smurfit-Stone shall maintain on site logs of the visual inspections when completing the compliance demonstrations as required by Sections V.K.4. The logs shall include the date of the inspection, equipment type and identification, results of negative pressure tests for enclosures, results of leak detection tests, the nature of the defect or leak and the method of detection, and the observer's initials (40 CFR 63.454).

Reporting

K.8. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide:

a. A summary of any corrective actions taken to correct leaks in the closed drain system;

b. A summary of the calculations to determine the digester production, mass of methanol, lbs methanol collected per oven dried ton pulp, and methanol collection factors. Also, a summary report of excess emissions should Smurfit-Stone not collect at least 7.2 lbs methanol/ODTP on a 60-day rolling average (40 CFR 63.10).

L. Low Volume, High Concentration (LVHC) Non-Condensable Gas (NCG) (40 CFR 63, Subpart S)

EU110 – Low Volume, High Concentration (LVHC) Non-Condensable Gas (NCG)
EU110a - No. 1 and No. 2 Evaporators: Vacuum Vents
EU110b – No. 3 Evaporator: Vacuum Vents
EU110c – No. 4 Evaporator: Vacuum Vents
EU110d – No. 5 Evaporator: Vacuum Vents
EU110e – No. 2 Concentrator: Hotwell and Vacuum System Vent
EU110f – No. 1 Concentrator: Hotwell and Vacuum System Vent
EU110g – M&D Digester: Blow Heat System Vent
EU110h – Turpentine Condenser Vent
EU110I - No. 1 and No. 2 Evaporators After Condenser Hotwell Vents
EU110j - No. 3 and No. 4 Evaporators Hotwell Vents
EU110k - No. 2 Concentrator, No. 5 Evaporator Spiral Condenser Vent, and Hotwell Vent
EU110l - No. 1 Black Liquor Spill Tank Vent
EU110m - No. 3 Blow Tank
EU110n - No. 1 and No. 2 Blow Tanks
EU110o - Foul Condensate Tank
EU110p - No. 4 Evaporator Auxiliary Surface Condenser and After Condensers Vents
EU110q - Steam Stripper-off gas
EU110h – Spill Collection Tank – Weak Black Liquor (Secondary)

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
L.1, L.2, L.3, L.4	LVHC NCG	Closed Vent System	Visual Inspection – Integrity of the Closed Vent System	Each Calendar Month	Semi-annual
			§63.457(d) No Detectable Leaks	Initially & Annually	
			Potential Excess Emission Reports	Ongoing	

Conditions

L.1. Smurfit-Stone shall operate and maintain a closed vent system for the specified low volume high concentration (LVHC), non-condensable gas (NCG) that is routed to a control device that meets the requirements specified in §63.443(d)((§63.443(c)).

Compliance Demonstration

L.2 Smurfit-Stone shall inspect the closed vent system's integrity at least once every calendar month. The visual inspection shall include the valves, piping, ductwork, enclosures, and connections for visible evidence of defects. If leaks are identified, Smurfit-Stone shall start repairs within 5 days and complete repairs within 15 days (40 CFR 63.453). Smurfit-Stone has conducted an initial leak test on the closed vent system that has demonstrated compliance with Section V.L.1. Smurfit-Stone shall conduct annual leak tests on the closed vent system to monitor compliance with Section V.L.1. The initial and annual tests to monitor no detectable leaks shall be completed as required by §63.457(d).

Recordkeeping

L.3 Smurfit-Stone shall maintain on site, logs when completing the monitoring demonstrations as required by Sections V.L.2. The logs shall include the date of the inspection, equipment type and identification, results of the nature of the defect or leak and the method of detection, and the observer's initials (40 CFR 63.454).

Reporting

L.4 The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semi-annual reporting shall provide:

a. A summary of any corrective actions taken to correct leaks in the closed vent system and the closed drain system with a summary of any testing completed,; and

b. A summary report of excess emissions (40 CFR 63.10).

M. Steam Stripper

EU154 – Steam Stripper
EU154a – Steam Stripper Vent
EU154b – Steam Stripper Feed Tank

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
M.1, M.4, M.7, M.10	Gaseous Emissions from Steam Stripper	Ducted to Thermal Oxidizer	Verification	Ongoing	Semi-annual
M.2, M.3, M.5, M.6, M.8, M.9, M.10	Steam Stripper	92 percent (by weight) methanol removed in specified collected condensate	Initial Test – NCASI 94.03 Direct Injection Test Methods for Methanol	60-Day Initial Test & Every 5 Years & 60-Day Rolling Average	Semi-annual
			Parameter Monitoring	On-going	Semi-annual
		Excess emissions from steam stripper and evaporator systems shall not exceed 10 percent (including SSM events)	Parameter Monitoring	On-going	Semi-annual

Conditions

M.1. All gaseous emissions from the Steam Stripper shall be ducted to the thermal oxidizer for oxidation of all reduced sulfur compounds (ARM 17.8.710).

M.2. Smurfit-Stone shall determine the methanol mass, concentration, and methanol treated in the collected condensate sent to, and from the Steam Stripper (§63.446(e)(3)).

M.3. Smurfit-Stone shall reduce HAPs, measured as methanol, on a 60-day rolling average by recycling collected condensates specified in Section V.K (EU109) to systems, including the evaporator system, equipped with vent control or by removal in the steam stripper of at least 92 percent (by weight) of methanol per oven-dried ton pulp criteria (40 CFR 63.446(e)(3)).

Excess emissions for the steam stripper system and, when used as an alternative means of treating collected condensates, the evaporator system shall not exceed 10 percent (including startup, shutdown, or malfunction) during a semi-annual period. (40 CFR 63.446 (g))

Compliance Demonstration

M.4. Smurfit-Stone shall verify that all gaseous emissions from the Steam Stripper shall be ducted to the thermal oxidizer to monitor compliance with Section V.M.1.

M.5. Once every five years after the initial test, Smurfit-Stone shall perform a 60-day test to determine the methanol treatment factors. The test shall be conducted to determine condensate flow, using the NCASI 94.03 direct injection test method for methanol and the concentration and mass of methanol treated in the steam stripper. Smurfit-Stone will use the collected test data and steam stripper operating parameters (Section IV.M.6) to develop methanol treatment factors. Smurfit-Stone shall determine the methanol treatment on a 60-day rolling average to monitor compliance with Section V.M.2 and M.3 using the methanol collection factors from the initial or subsequent tests.

M.6. Smurfit-Stone shall continuously monitor the following parameters for methanol removal as required by Section IV.M.3. The data will be used to monitor compliance on a 60-day rolling average.

a. Steam Stripper - Steam feed rate

b. Steam Stripper - Process wastewater (collected condensate) feed rate

c. Steam Stripper - Column feed temperature

d. Collected condensate overflow from the feed tanks for the steam stripper system and evaporator system.

Recordkeeping

M.7. No recordkeeping is necessary to monitor compliance with Section V.M.4

M.8. Smurfit-Stone shall maintain on site the daily averages of the steam stripper operating parameters listed in V.M.5, and the calculations demonstrating methanol treatment by the steam stripper. The calculations shall be submitted to the Department upon request.

M.9. Smurfit-Stone shall maintain a summary of the continuous data collected as required by Section V.M.6 and submit it to the Department as required by 40 CFR 63, Subpart S.

Reporting

M.10. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide:

a. A summary of the data collected as required by Sections V.M.8 and M.9,

b. Summary Report of Excess Emissions (40 CFR 63.10); and

c. A verification that the gaseous emissions were ducted to the thermal oxidizer.

N. Thermal Oxidizer

EU153 – Thermal Oxidizer
EU 153a – Thermal Oxidizer Scrubber Stack

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
N.1, N.7, N.12, N.17, N.18	Digester Gaseous Emissions	Ducted to Lime Kiln/Thermal Oxidizer	Verification	Ongoing	Semi-annual
N.2, N.8, N.13, N.17	Combustion Chamber temperature	>1600 °F	CMS	Daily Average	Semi-annual
		Continuously monitor temp. Accurately to ± 1%	Audit monitor	Annually	Semi-annual
N.3, N.9, N.14, N.17	Steam Stripper Off-gas and Combined LVHC NCG	Closed Vent Gas System Bypass Opening	Excess emissions not to Exceed 1%	Verify Valve Position Every 15 Minutes	Semi-annual
N.4, N.10, N.15, N.17	Combustion Chamber Residence Time	0.75 seconds	Parametric Monitoring	Original Submittal & Monthly	Semi-annual
N.5, N.11, N.16, N.17	Opacity	20%	Method 9	As Required by the Department	Semi-annual
N.6, N.11, N.16, N.17	Particulate Matter	0.10 gr/dscf Corrected to 10% O_2	Method 5	As Required by the Department	Semi-annual

Conditions

N.1. Prior to installation of the thermal oxidizer, all gaseous emissions from the batch and continuous digesters shall be ducted to the lime kilns for oxidation of all reduced sulfur compounds. After installation and start up of the thermal oxidizer, all gaseous emissions from these units shall then be ducted to the thermal oxidizer for oxidation of all reduced sulfur compounds. (ARM 17.8.710)

N.2. Smurfit-Stone must operate a continuous temperature monitoring system accurate to +/- 1 percent in the combustion zone of the Thermal Oxidizer, and maintain on a daily average the Thermal Oxidizer combustion chamber temperature of at least 1,600 °F during the periods when the Thermal Oxidizer is used for combustion of the combined low-volume high concentration non-condensable gas (LVHC-NCG) and steam stripper off-gas (40 CFR 63.443(d)(3) and ARM 17.8.321(3)).

N.3. Smurfit-Stone shall limit bypass venting, from the combined LVHC-NCG and steam stripper off-gas, of the combustion system to 1% or less, excluding start-ups, shutdowns, and malfunctions (40 CFR 443(e)(1)).

N.4. Smurfit-Stone must design and operate the Thermal Oxidizer combustion chamber with a minimum of 0.75 seconds residence time for treatment of the combined LVHC-NCG and steam stripper off-gas (40 CFR 63.443(d)(3) and ARM 17.8.321(3)).

N.5. Smurfit-Stone shall not cause or authorize to be discharged into the atmosphere, from the thermal oxidizer, any visible emissions that exhibit an opacity of 20% or greater (ARM 17.8.715).

N.6. Smurfit-Stone shall not cause or authorize to be discharged into the atmosphere from the thermal oxidizer, any particulate matter emissions in excess of 0.10 gr/dscf corrected to 10% O_2 (ARM 17.8.715).

Compliance Demonstration

N.7. Smurfit-Stone shall verify that the batch and continuous digester gaseous emissions are being sent to the lime kiln/thermal oxidizer to monitor compliance with Section V.N.1.

N.8. Annually, Smurfit-Stone shall audit the thermal oxidizer CMS temperature monitoring instrumentation to monitor compliance with Section V.N.2.

N.9. Smurfit-Stone shall operate a CMS that will record the bypass vent valve position for the combined LVHC-NCG and steam stripper off gas (open or closed) at least every 15 minutes to monitor compliance with Section V.N.3 (40 CFR 63.450(d)).

N.10. The Thermal Oxidizer residence time shall be calculated using the designated parameters on a monthly basis. Smurfit-Stone shall submit the parameters to the Department within 10 days of final permit issuance.

N.11. As required by the Department, Smurfit-Stone shall conduct a Method 9 opacity test and a Method 5 source test on the Thermal Oxidizer to monitor compliance with the limitations contained in Section II.V.N.5 and N.6. These tests shall be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.105 and 17.8.106).

Recordkeeping

N.12. No recordkeeping is required for compliance with Section V.N.7.

N.13. Smurfit-Stone shall maintain CMS records of the daily average temperature in the combustion zone of the Thermal Oxidizer, and the annual temperature audit in accordance with 40 CFR Part 63, Subpart S, and shall submit them to the Department upon request.

N.14. Smurfit-Stone shall maintain the records of by-pass venting for the combined LVHC-NCG and steam stripper off gas, as required by Section V.N.3, and report the percent time of excess emissions, from the combined LVHC-NCG and steam stripper off gas, that the combustion system was bypassed, semi-annually to the Department as required by 40 CFR 63.10 (e)(vi).

N.15. Smurfit-Stone shall maintain a log of the calculation as required by Section V.N.10. The log shall include the parameter calculations, date, time, and reviewer's initials.

N.16. All stack test records must be maintained on site and submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual.

Reporting

N.17. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide:

a. A summary of the CMS data maintained as required by Section V.N.13;

b. A summary of excess emissions from the combustion system based on the recorded by-pass venting of the combined LVHC-NCG system and steam stripper off-gas system as required by Section V.N.14;

c. A summary of the log maintained to monitor compliance with Section V.N.4.

d. A summary of results of any source testing that was performed during the semiannual period.

N.18. Smurfit-Stone has reported to the Department, in accordance with the required time frames, the following conditions:

a. Commencement of construction of the thermal oxidizer within 30 days after commencement of construction.

b. Anticipated start-up date of the thermal oxidizer between 30 and 60 days prior to the actual start-up date.

c. Actual start-up date of the thermal oxidizer within 15 days after the actual start up.

O. Natural Gas Boilers

EU024 – No. 1 Power Boiler

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
O.1, O.2, O.3, O.4	Opacity	40%	Method 9	As Required by the Department	Semi-annual

Conditions

O.1. Smurfit-Stone shall not cause or authorize emissions from the No.1 Power Boiler to be discharged into the outdoor atmosphere that exhibit an opacity of 40% or greater averaged over 6 consecutive minutes (ARM 17.8.304(1)).

Compliance Demonstration

O.2. As required by the Department, Smurfit-Stone shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual. Each observation period shall be a minimum of 6 minutes unless any one reading is 40% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 & 106).

Recordkeeping

O.3. All test records must be maintained on site and submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual.

Reporting

O.4. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide a summary of results of the last source testing that was performed.

P. Miscellaneous Tanks/Vent

EU102(a-t) – Black Liquor Handling
EU119(a-e) – Quick Lime/Dry Lime Handling
EU127(a-b) – Tall Oil Reactor
EU131(a-j) – White Liquor Handling
EU107 - Chemical Storage Tanks

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
P.1, P.2, P.3, P.4	Opacity	20%	Method 9	As Required by the Department	Semi-annual

Conditions

P.1. Smurfit-Stone shall not cause or authorize emissions from the Miscellaneous Tanks/Vents to be discharged into the outdoor atmosphere that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).

Compliance Demonstration

P.2. As required by the Department, Smurfit-Stone shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 & 106).

Recordkeeping

P.3. All test records must be maintained on site and submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual.

Reporting

P.4. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide a summary of results of the last source testing that was performed.

SECTION VI
PERMIT CONDITIONS
PAPER MILL DEPARTMENT
ENVIRONMENTAL AND TECHNICAL DEPARTMENT
ENGINEERING AND MAINTENANCE DEPARTMENT

A. Paper Machines

EU030 - No. 1 Paper Machine Wet End
EU031 - No. 1 Paper Machine Dryer
EU032 - No. 2 Paper Machine Wet End
EU033 - No. 2 Paper Machine Dryer
EU034 – No. 3 Paper Machine Wet End
EU035 - No. 3 Paper Machine Dryer
EU037 – Starch Handling
EU038 – Clay Handling

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
A.1, A.5, A.8, A.11	Opacity	40%	Method 9	As Required by the Department	Semi-annual
A.2, A.5, A.8, A.11	Opacity	20%			
A.3, A.6, A.9, A.11	No. 3 Paper Machine Production	481,000 Tons ADP/ 12-Month Rolling Period	Maintain a Log	Monthly Calculations	Semi-annual
A.4, A.7, A.10, A.11	Starch Handling & Clay Handling,	Baghouses	Operate and Maintain	Ongoing	Semi-annual

Conditions

A.1. Smurfit-Stone shall not cause or authorize emissions from the No. 1 and No. 2 Paper Machines to be discharged into the outdoor atmosphere that exhibit an opacity of 40% or greater averaged over 6 consecutive minutes (ARM 17.8.304(1)).

A.2. Smurfit-Stone shall not cause or authorize emissions from the No. 3 Paper Machine, Starch handling, Clay handling, and Salt cake/Lime handling to be discharged into the outdoor atmosphere that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).

A.3. The yearly production from the No. 3 Paper Machine shall be limited to 481,000 tons of air-dried pulp during any rolling 12-month period. This limit includes pulp input from the pulp mill, as well as other sources (i.e., the OCC plant) and correlates to a limit of 460,993 machine tons of paper produced during any rolling 12-month period. (ARM 17.8.1201(10))

A.4. Smurfit-Stone shall operate and maintain baghouses on the starch handling and the clay handling (ARM 17.8.1201(10)).

Compliance Demonstration

A.5. As required by the Department, Smurfit-Stone shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section VI.A.1 and A.2. Each observation period shall be a minimum of 6 minutes unless any one reading is 40% or 20% as applicable or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 & 106).

A.6. Smurfit-Stone shall maintain by month, the total production of the No. 3 Paper Machine. By the 25th of each month, Smurfit-Stone shall add up the total production of the No. 3 Paper Machine during the previous 12 months to monitor compliance with Section VI.A.3.

A.7. Verification of ongoing operation and maintenance of the baghouses will monitor compliance with Section VI.A.4.

Recordkeeping

A.8. All test records must be maintained on site and submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual.

A.9. The production log required by Section VI.A.6 shall be maintained on site and submitted to the Department upon request.

A.10. No recordkeeping is necessary to monitor compliance with the ongoing operation of the baghouses.

Reporting

A.11. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide:

a. A summary of results of the last source testing that was performed;

b. A summary of the production log for the No. 3 Paper Machine; and

c. Verification that the baghouses were operated on an ongoing basis.

B. EU130 – Effluent Treatment System

EU130a- Paper Mill Raw Post Consumer Effluent Vent
EU130b - Sludge Holding Tank
EU130c - Sludge Press
EU130d - Sludge Press Building Vent
EU130e - Sludge Storage Ponds
EU130f - Primary Clarifier
EU130g - Aeration Basin No. 1
EU130h - Aeration Basin No. 2
EU130i- Aeration Basin No. 3
EU130j - Treated Effluent Ponds
EU130k - Polishing Ponds

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
B.1, B.2, B.3, B.4	Opacity	20%	Method 9	As Required by the Department	Semi-annual

Conditions

B.1. Smurfit-Stone shall not cause or authorize emissions from the Effluent Treatment System to be discharged into the outdoor atmosphere that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).

Compliance Demonstration

B.2. As required by the Department, Smurfit-Stone shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time (ARM 17.8.105 & 106).

Recordkeeping

B.3. All test records must be maintained on site and submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual.

Reporting

B.4. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide a summary of results of the last source testing that was performed.

C. EU120 – Roads, Unpaved

EU120 – Unpaved Road Fugitives

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Frequency	Reporting Requirements
C.1, C.2, C.3, C.4	Fugitive Emissions	Reasonable Precautions	Maintain a Log of Corrective Actions	As Necessary	Semi-annual

Conditions

C.1. Smurfit-Stone shall not cause or authorize the use of any street, road or parking lot without taking reasonable precautions to control emissions of airborne particulate matter, unless otherwise specified by rule or in this permit (ARM 17.8.1201(10)).

Compliance Demonstration

C.2. Smurfit-Stone shall use reasonable precautions to control fugitive emissions and maintain a log of any actions taken.

Recordkeeping

C.3. Smurfit-Stone shall maintain the log, on site, of any corrective action taken to control fugitive emissions.

Reporting

C.4. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide a summary of any corrective actions taken.

D. Liquid Fuel Handling

EU111 – Liquid Fuel Handling

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Frequency	Reporting Requirements
D.1, D.2, D.3, D.4	Opacity	20%	Method 9	As Required by the Department	Semi-annual

Conditions

D.1. Smurfit-Stone shall not cause or authorize emissions from the Liquid Fuel Handling to be discharged into the outdoor atmosphere that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).

Compliance Demonstration

D.2. As required by the Department, Smurfit-Stone shall perform a Method 9 test in accordance with the Montana Source Test Protocol and Procedures Manual. Each observation period shall be a minimum of 6 minutes unless any one reading is 20% or greater; then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, which ever is a shorter period of time (ARM 17.8.105 & 106).

Recordkeeping

D.3. All test records must be maintained on site and submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual.

Reporting

D.4. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements. The semiannual reporting shall provide a summary of results of the last source testing that was performed.

E. EU152 – CFC Recycling

EU152 – CFC Recycling – Freon Recycling

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Frequency	Reporting Requirements
E.1, E.6, E.7, E.8	Appliance or Industrial Process Refrigeration Equipment	No Venting CFCs and HCFCs	Compliance in Accordance w/ 40 CFR 82	As Necessary	Annual
E.2, E.6, E.7, E.8	Equipment Manufactured After November 15, 1993 Prior to November 15, 1993	EPA Approved Testing org. Stds in Table 3 of §82.158(c)			
E.3, E.6, E.7, E.8	Equipment	Repair Leaks and Develop Plan			
E.4, E.6, E.7, E.8	Equipment Servicing and Refrigerant Purchases for Equipment	Maintain Records if >50 lb of CFC			
E.5, E.6, E.7, E.8	Mandatory Recycling Technician Certification	Maintain			

E.1. Smurfit-Stone shall not intentionally vent CFCs and HCFCs used as refrigerants when maintaining, servicing, repairing, or disposing of an appliance or industrial process refrigeration equipment (40 CFR 82.154; EPA enforceable only).

E.2. Recycling equipment manufactured after November 15, 1993, must be tested by an EPA-approved testing organization. Recycling equipment manufactured prior to November 15, 1993, shall meet the standards specified in Table 3 of §82.158(c) (40 CFR 82.158; EPA enforceable only).

E.3. Smurfit-Stone shall repair substantial leaks in accordance with 40 CFR 82 or develop a 1-year equipment retrofit or retirement plan for leaking equipment (40 CFR 82.156 and 166; EPA enforceable only).

E.4. Smurfit-Stone shall keep records of equipment servicing and refrigerant purchases for equipment holding more than 50 lb of CFC (40 CFR 82.166(k); EPA enforceable only).

E.5. Smurfit-Stone shall comply with the mandatory recycling technician certification (40 CFR 82.161; EPA enforceable only).

Compliance Demonstration

E.6. Smurfit-Stone shall monitor compliance in accordance with 40 CFR 82.

Recordkeeping

E.7. Smurfit-Stone shall maintain records in accordance with 40 CFR 82 and submit the records to the Department upon request.

Reporting

E.8. The annual compliance certification report required by Section VIII.B must contain a certification statement for the above applicable requirements.

SECTION VII
NON-APPLICABLE REQUIREMENTS

Air Quality Administrative Rules of Montana (ARM) and Federal Regulations identified as not applicable to the facility or to a specific emission unit at the time of the permit issuance are listed below (ARM 17.8.1214). The following list does not preclude the need to comply with any new requirements that may become applicable during the permit term.

A. Facility-Wide

The following table contains non-applicable requirements that are administrated by the Air and Waste Management Bureau of the Department of Environmental Quality (Department).

Rule Citation	Reason
40 CFR 60, Subparts C, Cb-Ce 40 CFR 60, Subparts E, Ea-Ec 40 CFR 60, Subparts F-Aaa 40 CFR 60, Subparts CC-WWW 40 CFR 61, Subpart B 40 CFR 61, Subpart D 40 CFR 61, Subparts F to FF 40 CFR 63, Subparts B to R 40 CFR 63, Subparts T to QQ 40 CFR 63, Subparts SS to JJJ 40 CFR 68	These requirements are not applicable because the facility is not an affected source as defined in these regulations.
40 CFR 82 ARM 17.8.316 ARM 17.8.320 ARM 17.8.326 ARM 17.8.330 ARM 17.8.323 ARM 17.8.324 ARM 17.8.331 ARM 17.8.332 ARM 17.8.333 ARM 17.8.334	These rules refer to a process, equipment, or activity that is not used at the facility.

B. Emission Units

The permit application identified applicable requirements: non-applicable requirements for individual or specific emission units were not listed. The Department has listed all non-applicable requirements in Section VIII.A; these requirements relate to each specific unit as well as facility wide.

SECTION VIII. GENERAL PERMIT CONDITIONS

A. Compliance Requirements

ARM 17.8, Subchapter 12, Operating Permit Program §1210(2)(a)-(c)&(e), §1206(6)(c)&(b)

1. Smurfit-Stone must comply with all conditions of the permit. Any noncompliance with the terms or conditions of the permit constitutes a violation of the Montana Clean Air Act, and may result in enforcement action, permit modification, revocation and reissuance, or termination, or denial of a permit renewal application under ARM Title 17, Chapter 8, Subchapter 12.

2. The filing of a request by Smurfit-Stone for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

3. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. If appropriate, this factor may be considered as a mitigating factor in assessing a penalty for noncompliance with an applicable requirement if the source demonstrates that both the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations, and that such health, safety or environmental impacts were unforeseeable and could not have otherwise been avoided.

4. Smurfit-Stone shall furnish to the Department, within a reasonable time set by the Department (not to be less than 15 days), any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, Smurfit-Stone shall also furnish to the Department copies of those records that are required to be kept pursuant to the terms of the permit. This subsection does not impair or otherwise limit the right of Smurfit-Stone to assert the confidentiality of the information requested by the Department, as provided in 75-2-105, MCA.

5. Any schedule of compliance for applicable requirements with which the source is not in compliance with at the time of permit issuance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it was based.

6. For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis unless a more detailed plan or schedule is required by the applicable requirement or the Department.

B. Certification Requirements

ARM 17.8, Subchapter 12, Operating Permit Program §1207 and §1213(7)(a)&(c)-(d)

1. Any application form, report, or compliance certification submitted pursuant to ARM Title 17, Chapter 8, Subchapter 12, shall contain certification by a responsible official of truth, accuracy and completeness. This certification and any other certification required under ARM Title 17, Chapter 8, Subchapter 12, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

2. Compliance certifications shall be submitted by February 15 of each year, or more frequently if otherwise specified in an applicable requirement or elsewhere in the permit. Each certification must include the required information for the previous calendar year (i.e., January 1 – December 31).

3. Compliance certifications shall include the following:

   a. The identification of each term or condition of the permit that is the basis of the certification;

   b. The identification of the method(s) or other means used by the owner or operator for determining the status of compliance with each term and condition during the certification period, consistent with ARM 17.8.1212;

   c. The status of compliance with each term and condition for the period covered by the certification, *including whether compliance during the period was continuous or intermittent* (based on the method or means identified in ARM 17.8.1213(7)(c)(ii), as described above); and

   d. Such other facts as the Department may require to determine the compliance status of the source.

4. All compliance certifications must be submitted to the Environmental Protection Agency, as well as to the Department, at the addresses listed in the Notification Addresses Appendix of this permit.

C. Permit Shield
ARM 17.8, Subchapter 12, Operating Permit Program §1214(1)-(4)

1. The applicable requirements and non-federally enforceable requirements are included and specifically identified in this permit and the permit includes a precise summary of the requirements not applicable to the source. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements and any non-federally enforceable requirements as of the date of permit issuance.

2. The permit shield described in 1 above shall remain in effect during the appeal of any permit action (renewal, revision, reopening, or revocation and reissuance) to the Board of Environmental Review (Board), until such time as the Board renders its final decision.

3. Nothing in this permit alters or affects the following:

   a. The provisions of Sec. 7603 of the FCAA, including the authority of the administrator under that section;

   b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

   c. The applicable requirements of the Acid Rain Program, consistent with Sec. 7651g(a) of the FCAA;

   d. The ability of the administrator to obtain information from a source pursuant to Sec. 7414 of the FCAA;

   e. The ability of the Department to obtain information from a source pursuant to the Montana Clean Air Act, Title 75, Chapter 2, MCA;

   f. The emergency powers of the Department under the Montana Clean Air Act, Title 75, Chapter 2, MCA; and

g. The ability of the Department to establish or revise requirements for the use of Reasonably Available Control Technology (RACT) as defined in ARM Title 17, Chapter 8. However, if the inclusion of a RACT into the permit pursuant to ARM Title 17, Chapter 8, Subchapter 12, is appealed to the Board, the permit shield, as it applies to the source's existing permit, shall remain in effect until such time as the Board has rendered its final decision.

4. Nothing in this permit alters or affects the ability of the Department to take enforcement action for a violation of an applicable requirement or permit term demonstrated pursuant to ARM 17.8.106, Source Testing Protocol.

5. Pursuant to ARM 17.8.132, for the purpose of submitting a compliance certification, nothing in these rules shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance. However, when compliance or noncompliance is demonstrated by a test or procedure provided by permit or other applicable requirements, the source shall then be presumed to be in compliance or noncompliance unless that presumption is overcome by other relevant credible evidence.

6. The permit shield will not extend to minor permit modifications or changes not requiring a permit revision (see Sections I & J).

7. The permit shield will extend to significant permit modifications and transfer or assignment of ownership (see Sections K & N).

D. Monitoring, Recordkeeping, and Reporting Requirements
ARM 17.8, Subchapter 12, operating Permit Program §1212(2)&(3)

1. Unless otherwise provided in this permit, Smurfit-Stone shall maintain compliance monitoring records that include the following information:

   a. The date, place as defined in the permit, and time of sampling or measurement;

   b. The date(s) analyses were performed;

   c. The company or entity that performed the analyses;

   d. The analytical techniques or methods used;

   e. The results of such analyses; and

   f. The operating conditions at the time of sampling or measurement.

2. Smurfit-Stone shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. All monitoring data, support information, and required reports and summaries may be maintained in computerized form at the plant site if the information is made available to Department personnel upon request, which may be for either hard copies or computerized format. Strip-charts must be maintained in their original form at the plant site and shall be made available to Department personnel upon request.

3. Smurfit-Stone shall submit to the Department, at the addresses located in the Notification Addresses Appendix of this permit, reports of any required monitoring by February 15 and August 15 of each year, or more frequently if otherwise specified in an applicable requirement or elsewhere in the permit. The monitoring report submitted on February 15 of each year must include the required monitoring information for the period of July 1 through December 31 of the previous year. The monitoring report submitted on August 15 of each year must include the required monitoring information for the period of January 1 through June 30 of the current year. All instances of deviations from the permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official, consistent with ARM 17.8.1207.

E. Prompt Deviation Reporting
ARM 17.8, Subchapter 12, Operating Permit Program §1212(3)(c)

Smurfit-Stone shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. To be considered prompt, deviations shall be reported as part of the routine reporting requirements under ARM 17.8.1212(3)(b) and, if applicable, in accordance with the malfunction reporting requirements under ARM 17.8.110, unless otherwise specified in an applicable requirement.

F. Emergency Provisions
ARM 17.8, Subchapter 12, Operating Permit Program §1201(13) and §1214(5), (6)&(8)

1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation and causes the source to exceed a technology-based emission limitation under this permit due to the unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of reasonable preventive maintenance, careless or improper operation, or operator error.

2. An emergency constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if Smurfit-Stone demonstrates through properly signed, contemporaneous logs, or other relevant evidence, that:

   a. An emergency occurred and Smurfit-Stone can identify the cause(s) of the emergency;

   b. The permitted facility was at the time being properly operated;

   c. During the period of the emergency Smurfit-Stone took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in the permit; and

   d. Smurfit-Stone submitted notice of the emergency to the Department within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice fulfills the requirements of ARM 17.8.1212(3)(c). This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

3. These emergency provisions are in addition to any emergency, malfunction or upset provision contained in any applicable requirement.

G. Inspection and Entry

ARM 17.8, Subchapter 12, Operating Permit Program §1213(3)&(4)

1. Upon presentation of credentials and other requirements as may be required by law, Smurfit-Stone shall allow the Department, the administrator, or an authorized representative (including an authorized contractor acting as a representative of the Department or the administrator) to perform the following:

   a. Enter the premises where a source required to obtain a permit is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

   b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

   c. Inspect at reasonable times any facilities, emission units, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

   d. As authorized by the Montana Clean Air Act and rules promulgated thereunder, sample or monitor, at reasonable times, any substances or parameters at any location for the purpose of assuring compliance with the permit or applicable requirements.

2. Smurfit-Stone shall inform the inspector of all workplace safety rules or requirements at the time of inspection. This section shall not limit in any manner the Department's statutory right of entry and inspection as provided for in 75-2-403, MCA.

H. Fee Payment

ARM 17.8, Subchapter 12, Operating Permit Program §1210(2)(f) and ARM 17.8, Subchapter 5, Air Quality Permit Application, Operation, and Open Burning Fees §505(3)-(5) (STATE ONLY)

1. Smurfit-Stone must pay application and operating fees, pursuant to ARM Title 17, Chapter 8, Subchapter 5.

2. Annually, the Department shall provide Smurfit-Stone with written notice of the amount of the fee and the basis for the fee assessment. The air quality operation fee is due 30 days after receipt of the notice, unless the fee assessment is appealed pursuant to ARM 17.8.511. If any portion of the fee is not appealed, that portion of the fee that is not appealed is due 30 days after receipt of the notice. Any remaining fee, which may be due after the completion of an appeal, is due immediately upon issuance of the Board's decision or upon completion of any judicial review of the Board's decision.

3. If Smurfit-Stone fails to pay the required fee (or any required portion of an appealed fee) within 90 days of the due date of the fee, the Department may impose an additional assessment of 15% of the fee (or any required portion of an appealed fee) or $100, whichever is greater, plus interest on the fee (or any required portion of an appealed fee), computed at the interest rate established under 15-31-510(3), MCA.

I. Minor Permit Modifications

ARM 17.8, Subchapter 12, Operating Permit Program §1226(3)&(11)

1. An application for a minor permit modification need only address in detail those portions of the permit application that require revision, updating, supplementation, or deletion, and may reference any required information that has been previously submitted.

2. The permit shield under ARM 17.8.1214 will not extend to any minor modifications processed pursuant to ARM 17.8.1226.

J. Changes Not Requiring Permit Revision
ARM 17.8, Subchapter 12, Operating Permit Program §1224(1)-(3), (5)&(6)

1. Smurfit-Stone is authorized to make changes within the facility as described below, provided the following conditions are met:

   a. The proposed changes do not require Smurfit-Stone to obtain an air quality preconstruction permit under ARM Title 17, Chapter 8, Subchapter 7;

   b. The proposed changes are not modifications under Title I of the FCAA, or as defined in ARM Title 17, Chapter 8, Subchapters 8, 9, or 10;

   c. The emissions resulting from the proposed changes do not exceed the emissions allowable under this permit, whether expressed as a rate of emissions or in total emissions;

   d. The proposed changes do not alter permit terms that are necessary to enforce applicable emission limitations on emission units covered by the permit; and

   e. The facility provides the administrator and the Department with written notification at least 7 days prior to making the proposed changes.

2. Smurfit-Stone and the Department shall attach each notice provided pursuant to 1.e above to their respective copies of this permit.

3. Pursuant to the conditions above, Smurfit-Stone is authorized to make Section 502(b)(10) changes, as defined in ARM 17.8.1201(30), without a permit revision. For each such change, the written notification required under 1.e above shall include a description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

4. Smurfit-Stone may make a change not specifically addressed or prohibited by the permit terms and conditions without requiring a permit revision, provided the following conditions are met:

   a. Each proposed change does not weaken the enforceability of any existing permit conditions;

   b. The Department has not objected to such change;

   c. Each proposed change meets all applicable requirements and does not violate any existing permit term or condition; and

   d. Smurfit-Stone provides contemporaneous written notice to the Department and the administrator of each change that is above the level for insignificant emission units as defined in ARM 17.8.1201(22) and 17.8.1206(3), and the written notice describes each such change, including the date of the change, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.

5. The permit shield authorized by ARM 17.8.1214 shall not apply to changes made pursuant to ARM 17.8.1224(3) and (5), but is applicable to terms and conditions that allow for increases and decreases in emissions pursuant to ARM 17.8.1224(4).

K. Significant Permit Modifications

ARM 17.8, Subchapter 12, Operating Permit Program §1227(1), (3)&(4)

1. The modification procedures set forth in 2 below must be used for any application requesting a significant modification of this permit. Significant modifications include the following:

   a. Any permit modification that does not qualify as either a minor modification or as an administrative permit amendment;

   b. Every significant change in existing permit monitoring terms or conditions;

   c. Every relaxation of permit reporting or recordkeeping terms or conditions that limit the Department's ability to determine compliance with any applicable rule, consistent with the requirements of the rule; or

   d. Any other change determined by the Department to be significant.

2. Significant modifications shall meet all requirements of ARM Title 17, Chapter 8, including those for applications, public participation, and review by affected states and the administrator, as they apply to permit issuance and renewal, except that an application for a significant permit modification need only address in detail those portions of the permit application that require revision, updating, supplementation or deletion.

3. The permit shield provided for in ARM 17.8.1214 shall extend to significant modifications.

L. Reopening for Cause

ARM 17.8, Subchapter 12, Operating Permit Program §1228(1)&(2)

1. This permit may be reopened and revised under the following circumstances:

   a. Additional applicable requirements under the FCAA become applicable to the facility when the permit has a remaining term of 3 or more years. Reopening and revision of the permit shall be completed not later than 18 months after promulgation of the applicable requirement. No reopening is required under ARM 17.8.1228(1)(a) if the effective date of the applicable requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms or conditions have been extended pursuant to ARM 17.8.1220(12) or 17.8.1221(2);

   b. Additional requirements (including excess emission requirements) become applicable to an affected source under the Acid Rain Program. Upon approval by the administrator, excess emission offset plans shall be deemed incorporated into the permit;

   c. The Department or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit; or

   d. The administrator or the Department determines that the permit must be revised or revoked and reissued to ensure compliance with the applicable requirements.

M. Permit Expiration and Renewal

ARM 17.8, Subchapter 12, Operating Permit Program §1210(2)(g), §1220(11)&(12), and §1205(2)(d)

1. This permit is issued for a fixed term of 5 years.

2. Renewal of this permit is subject to the same procedural requirements that apply to permit issuance, including those for application, content, public participation, and affected state and administrator review.

3. Expiration of this permit terminates Smurfit-Stone's right to operate unless a timely and administratively complete renewal application has been submitted consistent with ARM 17.8.1221 and 17.8.1205(2)(d). If a timely and administratively complete application has been submitted, all terms and conditions of the permit, including the application shield, remain in effect after the permit expires until the permit renewal has been issued or denied.

4. For renewal, Smurfit-Stone shall submit a complete air quality operating permit application to the Department not later than 6 months prior to the expiration of this permit, unless otherwise specified. If necessary to ensure that the terms of the existing permit will not lapse before renewal, the Department may specify, in writing to Smurfit-Stone, a longer time period for submission of the renewal application. Such written notification must be provided at least 1-year before the renewal application due date established in the existing permit.

N. Severability Clause
ARM 17.8, Subchapter 12, Operating Permit Program §1210(2)(i)&(l)

1. The administrative appeal or subsequent judicial review of the issuance by the Department of an initial permit under this subchapter shall not impair in any manner the underlying applicability of all applicable requirements, and such requirements continue to apply as if a final permit decision had not been reached by the Department.

2. If any provision of a permit is found to be invalid, all valid parts that are severable from the invalid part remain in effect. If a provision of a permit is invalid in one or more of its applications, the provision remains in effect in all valid applications that are severable from the invalid applications.

O. Transfer or Assignment of Ownership
ARM 17.8, Subchapter 12, Operating Permit Program §1225(2)&(4)

1. If an administrative permit amendment involves a change in ownership or operational control, the applicant must include in its request to the Department a written agreement containing a specific date for the transfer of permit responsibility, coverage and liability between the current and new permittee.

2. The permit shield provided for in ARM17.8.1214 shall not extend to administrative permit amendments.

P. Emissions Trading, Marketable Permits, Economic Incentives
ARM 17.8, Subchapter 12, Operating Permit Program §1226(2)

Notwithstanding ARM 17.8.1226(1) and (7), minor air quality operating permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in the Montana State Implementation Plan or in applicable requirements promulgated by the administrator.

Q. No Property Rights Conveyed
ARM 17.8, Subchapter 12, Operating Permit Program §1210(2)(d)

This permit does not convey any property rights of any sort, or any exclusive privilege.

R. Testing Requirements
ARM 17.8, Subchapter 1, General Provisions §105

Smurfit-Stone shall comply with ARM 17.8.105.

S. Source Testing Protocol
ARM 17.8, Subchapter 1, General Provisions §106

Smurfit-Stone shall comply with ARM 17.8.106.

T. Malfunctions
ARM 17.8, Subchapter 1, General Provisions §110

Smurfit-Stone shall comply with ARM 17.8.110.

U. Circumvention
ARM 17.8, Subchapter 1, General Provisions §111

Smurfit-Stone shall comply with ARM 17.8.111.

V. Motor Vehicles
ARM 17.8, Subchapter 3, Emission Standards §325

Smurfit-Stone shall comply with ARM 17.8.325.

W. Annual Emissions Inventory
ARM 17.8, Subchapter 5, Air Quality Permit Application, Operation and Open Burning Fees §505 (STATE ONLY)

Smurfit-Stone shall supply the Department with annual production and other information for all emission units necessary to calculate actual or estimated actual amount of air pollutants emitted during each calendar year. Information shall be gathered on a calendar-year basis and submitted to the Department by the date required in the emission inventory request, unless otherwise specified in this permit. Information shall be in the units required by the Department.

X. Open Burning
ARM 17.8, Subchapter 6, Open Burning §604, 605 and 606

Smurfit-Stone shall comply with ARM 17.8.604, 605 and 606.

Y. Montana Air Quality Permits
ARM 17.8, Subchapter 7, Permit, Construction and Operation of Air Contaminant Sources §745 and 764 (ARM 17.8.745(1) and 764(1)(b) are STATE ENFORCEABLE ONLY until approval by the EPA as part of the SIP)

1. Except as specified, no person shall construct, install, alter or use any air contaminant source or stack associated with any source without first obtaining a permit from the Department or Board. A permit is not required for those sources or stacks as specified by ARM 17.8.744(1)(a)-(k).

2. Smurfit-Stone shall comply with ARM 17.8.743, 744, 745, 748, and 764.

3. ARM 17.8.745(1) specifies de minimis changes as construction or changed conditions of operation at a facility holding an air quality preconstruction permit issued under Chapter 8 that does not increase the facility's potential to emit by more than 15 tons per year of any pollutant, except (STATE ENFORCEABLE ONLY until approved by the EPA as part of the SIP):

a. Any construction or changed condition that would violate any condition in the facility's existing air quality preconstruction permit or any applicable rule contained in Chapter 8 is prohibited, except as provided in ARM 17.8.745(2);

b. Any construction or changed conditions of operation that would qualify as a major modification under Subchapters 8, 9 or 10 of Chapter 8;

c. Any construction or changed condition of operation that would affect the plume rise or dispersion characteristic of emissions that would cause or contribute to a violation of an ambient air quality standard or ambient air increment as defined in ARM 17.8.804;

d. Any construction or improvement project with a potential to emit more than 15 tons per year may not be artificially split into smaller projects to avoid air quality preconstruction permitting; or

e. Emission reductions obtained through offsetting within a facility are not included when determining the potential emission increase from construction or changed conditions of operation, unless such reductions are made federally enforceable.

4. Any facility making a de minimis change pursuant to ARM 17.8.745(1) shall notify the Department if the change would include a change in control equipment, stack height, stack diameter, stack gas temperature, source location or fuel specifications, or would result in an increase in source capacity above its permitted operation or the addition of a new emission unit. The notice must be submitted, in writing, 10 days prior to start up or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change, and must include the information requested in ARM 17.8.745(1) (STATE ENFORCEABLE ONLY until approval by the EPA as part of the SIP).

Z. National Emission Standard for Asbestos
40 CFR, Part 61, Subpart M

Smurfit-Stone shall not conduct any asbestos abatement activities except in accordance with 40 CFR 61, Subpart M (National Emission Standard for Hazardous Air Pollutants for Asbestos).

AA. Asbestos
ARM 17.74, Subchapter 3, General Provisions and Subchapter 4, Fees

Smurfit-Stone shall comply with ARM 17.74.301, *et seq*., and ARM 17.74.401, *et seq*. (State only)

BB. Stratospheric Ozone Protection – Servicing of Motor Vehicle Air Conditioners
40 CFR, Part 82, Subpart B

If Smurfit-Stone performs a service on motor vehicles and this service involves ozone-depleting substance/refrigerant in the motor vehicle air conditioner (MVAC), Smurfit-Stone is subject to all the applicable requirements as specified in 40 CFR 82, Subpart B.

CC. Stratospheric Ozone Protection – Recycling and Emission Reductions
40 CFR, Part 82, Subpart F

Smurfit-Stone shall comply with the standards for recycling and emission reductions in 40 CFR 82, Subpart F, except as provided for MVACs in Subpart B.

1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.

2. Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.

3. Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technical certification program pursuant to §82.161.

4. Persons disposing of small appliances, MVACs and MVAC-like (as defined at §82.152) appliances must comply with recordkeeping requirements pursuant to §82.166.

5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.

6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

DD. Emergency Episode Plan

Smurfit-Stone shall comply with the requirements contained in Chapter 9.7 of the State of Montana Air Quality Control Implementation Plan.

Each major source emitting 100 tons per year located in a Priority I Air Quality Control Region, shall submit to the Department a legally enforceable Emergency Episode Action Plan (EEAP) that details how the source will curtail emissions during an air pollutant emergency episode. The industrial EEAP shall be in accordance with the Department's EEAP and shall be submitted according to a timetable developed by the Department, following Priority I reclassification.

EE. Definitions

Terms not otherwise defined in this permit or in the Definitions and Abbreviations Appendix of this permit, shall have the meaning assigned to them in the referenced regulations.

APPENDICES

APPENDIX A INSIGNIFICANT EMISSION UNITS

Disclaimer: The information in this appendix is not State or Federally enforceable, but is presented to assist Smurfit-Stone, the permitting authority, inspectors, and the public.

Pursuant to ARM 17.8.1201(22)(a), an insignificant emission unit means any activity or emission unit located within a source that: (i) has a potential to emit less than 5 tons per year of any regulated pollutant; (ii) has a potential to emit less than 500 pounds per year of lead; (iii) has a potential to emit less than 500 pounds per year of hazardous air pollutants listed pursuant to Section 7412 (b) of the FCAA; and (iv) is not regulated by an applicable requirement, other than a generally applicable requirement that applies to all emission units subject to Subchapter 12.

List of Insignificant Activities:

The following table of insignificant sources and/or activities were provided by Smurfit-Stone. Because there are no requirements to update such a list, the emission units and/or activities may change from those specified in the table.

Emission Unit ID	Description
IEU01	Chip Fines to Hog Fuel (& Sawdust Fines)
IEU02	Shower Water Tank Stack
IEU03	Black Liquor Charge Tank
IEU04	Liquor Filter Vent
IEU05	No. 1 Filtrate Tank Vent (SD Filtrate)
IEU06	No. 4 Evaporator Feed Tank
IEU07	Spill Tank in Batch Area
IEU08	Pins Kamyr Low Pressure Feeder Relief Cyclone
IEU09	M&D Digester Chip Feeder Vent
IEU10	Kamyr Chip Bin Vent
IEU11	Recycled Fiber Bale Storage
IEU12	Turpentine Storage Tank
IEU13	No. 5 Recovery Building Roof Steam Vents
IEU14	Coke Storage Tank
IEU15	No.6 Fuel Oil Tank
IEU16	Dregs Wash Tank
IEU17	No. 1 Green Liquor Clarifier Tank Vents
IEU18	No. 1 Green Liquor Storage Tank Vents
IEU19	No. 2 Green Liquor Clarifier Tank Vents
IEU20	Raw Green Liquor Storage Tank Vent
IEU21	No. 3 Mud Washer Tank Vents
IEU22	No. 1 Mud Washer Tank Vents
IEU23	No. 1 & No. 2 Mud Filter Hood
IEU24	No. 1 Mud Storage Tank – Serves No. 1 & No. 2 Lime Kilns
IEU25	No. 2 Mud Washer Tank Vent
IEU26	No. 2 Mud Storage Tank
IEU27	No. 3 Kiln Mud Filter Hood
IEU28	No. 3 Lime Kiln Mud Filter Vacuum Pump Exhaust Stack
IEU29	No. 3 Mud Storage Tank Vents
IEU30	No. 4 Lime Kiln Mud Filter Hood
IEU31	No. 4 Lime Kiln Mud Filter Vacuum Pump Exhaust Stack
IEU32	Warehouse/Shipping Dock Roof Vents
IEU33	Diesel Tank Vent
IEU34	Gasoline Tank Vent
IEU35	Paved Road Fugitives

APPENDIX B DEFINITIONS and ABBREVIATIONS

"Act" means the Clean Air Act, as amended, 42 U.S. 7401, *et seq*.

"Administrative permit amendment" means an air quality operating permit revision that:

(a) Corrects typographical errors;

(b) Identifies a change in the name, address or phone number of any person identified in the air quality operating permit, or identifies a similar minor administrative change at the source;

(c) Requires more frequent monitoring or reporting by Smurfit-Stone;

(d) Requires changes in monitoring or reporting requirements that the Department deems to be no less stringent than current monitoring or reporting requirements;

(e) Allows for a change in ownership or operational control of a source if the Department has determined that no other change in the air quality operating permit is necessary, consistent with ARM 17.8.1225; or

(f) Incorporates any other type of change, which the Department has determined to be similar to those revisions set forth in (a)-(e), above.

"Applicable requirement" means all of the following as they apply to emission units in a source requiring an air quality operating permit (including requirements that have been promulgated or approved by the Department or the administrator through rule making at the time of issuance of the air quality operating permit, but have future-effective compliance dates, provided that such requirements apply to sources covered under the operating permit):

(a) Any standard, rule, or other requirement, including any requirement contained in a consent decree or judicial or administrative order entered into or issued by the Department, that is contained in the Montana state implementation plan approved or promulgated by the administrator through rule making under Title I of the FCAA;

(b) Any federally enforceable term, condition or other requirement of any air quality preconstruction permit issued by the Department under Subchapters 7, 8, 9 and 10 of this chapter, or pursuant to regulations approved or promulgated through rule making under Title I of the FCAA, including parts C and D;

(c) Any standard or other requirement under Sec. 7411 of the FCAA, including Sec. 7411(d);

(d) Any standard or other requirement under Sec. 7412 of the FCAA, including any requirement concerning accident prevention under Sec. 7412(r)(7), but excluding the contents of any risk management plan required under Sec. 7412(r);

(e) Any standard or other requirement of the acid rain program under Title IV of the FCAA or regulations promulgated thereunder;

(f) Any requirements established pursuant to Sec. 7661c(b) or Sec. 7414(a)(3) of the FCAA;

(g) Any standard or other requirement governing solid waste incineration, under Sec. 7429 of the FCAA;

(h) Any standard or other requirement for consumer and commercial products, under Sec. 7511b(e) of the FCAA;

(i) Any standard or other requirement for tank vessels, under Sec. 7511b(f) of the FCAA;

(j) Any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the FCAA, unless the administrator determines that such requirements need not be contained in an air quality operating permit;

(k) Any national ambient air quality standard or increment or visibility requirement under part C of Title I of the FCAA, but only as it would apply to temporary sources permitted pursuant to Sec. 7661c(e) of the FCAA; or

(l) Any federally enforceable term or condition of any air quality open burning permit issued by the Department under subchapter 6.

"Department" means the Montana Department of Environmental Quality.

"Emission unit" means any part or activity of a stationary source that emits or has the potential to emit any regulated air pollutant or any pollutant listed under Sec. 7412(b) of the FCAA. This term is not meant to alter or affect the definition of the term "unit" for purposes of Title IV of the FCAA.

"FCAA" means the Federal Clean Air Act, as amended.

"Federally enforceable" means all limitations and conditions which are enforceable by the administrator, including those requirements developed pursuant to 40 CFR Parts 60 and 61, requirements within the Montana state implementation plan, and any permit requirement established pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, including operating permits issued under an EPA approved program that is incorporated into the Montana state implementation plan and expressly requires adherence to any permit issued under such program.

"Fugitive emissions" means those emissions, which could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening.

"General air quality operating permit" or **"general permit"** means an air quality operating permit that meets the requirements of ARM 17.8.1222, covers multiple sources in a source category, and is issued in lieu of individual permits being issued to each source.

"Hazardous air pollutant" means any air pollutant listed as a hazardous air pollutant pursuant to Section 112(b) of the FCAA.

"Mill Day" means the 24-hr period from 5:00 am to 5:00 am.

"Non-federally enforceable requirement" means the following as they apply to emission units in a source requiring an air quality operating permit:

(a) Any standard, rule, or other requirement, including any requirement contained in a consent decree, or judicial or administrative order entered into or issued by the Department, that is not contained in the Montana state implementation plan approved or promulgated by the administrator through rule making under Title I of the FCAA;

(b) Any term, condition or other requirement contained in any air quality preconstruction permit issued by the Department under Subchapters 7, 8, 9 and 10 of this chapter that is not federally enforceable;

(c) Does not include any Montana ambient air quality standard contained in Subchapter 2 of this chapter.

"Permittee" means the owner or operator of any source subject to the permitting requirements of this subchapter, as provided in ARM 17.8.1204, that holds a valid air quality operating permit or has submitted a timely and complete permit application for issuance, renewal, amendment, or modification pursuant to this subchapter.

"Regulated air pollutant" means the following:

(a) Nitrogen oxides or any volatile organic compounds;

(b) Any pollutant for which a national ambient air quality standard has been promulgated;

(c) Any pollutant that is subject to any standard promulgated under Sec. 7411 of the FCAA;

(d) Any Class I or II substance subject to a standard promulgated under or established by Title VI of the FCAA; or

(e) Any pollutant subject to a standard or other requirement established or promulgated under Sec. 7412 of the FCAA, including but not limited to the following:

(i) Any pollutant subject to requirements under Sec. 7412(j) of the FCAA. If the administrator fails to promulgate a standard by the date established in Section 7412(e) of the FCAA, any pollutant for which a subject source would be major shall be considered to be regulated on the date 18 months after the applicable date established in Section 7412(e) of the FCAA;

(ii) Any pollutant for which the requirements of Section 7412(g)(2) of the FCAA have been met but only with respect to the individual source subject to Sec. 7412(g)(2) requirement.

"Responsible official" means one of the following:

(a) For a corporation: a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:

(i) The facilities employ more than 250 persons or have gross annual sales or expenditures exceeding $25 million (in second quarter 1980 dollars); or

(ii) The delegation of authority to such representative is approved in advance by the Department.

(b) For a partnership or sole proprietorship: a general partner or the proprietor; respectively.

(c) For a municipality, state, federal, or other public agency: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a regional administrator of the environmental protection agency).

(d) For affected sources: the designated representative in so far as actions, standards, requirements, or prohibitions under Title IV of the FCAA or the regulations promulgated thereunder are concerned, and the designated representative for any other purposes under this subchapter.

Abbreviations:

ARM	Administrative Rules of Montana
ASTM	American Society of Testing Materials
BACT	Best Available Control Technology
BDT	bone dry tons
BTU	British Thermal Unit
CEMS	Continuous Emission Monitoring System
CFC	Chlro-Fluro Carbons
CFR	Code of Federal Regulations
CMS	Continuous Monitoring System
CO	carbon monoxide
COMS	Continuous Opacity Monitoring System
DEQ	Department of Environmental Quality
dscf	dry standard cubic foot
dscfm	dry standard cubic foot per minute
EEAP	Emergency Episode Action Plan
EER	Excess Emission Report
EPA	U.S. Environmental Protection Agency
EPA Method	Test methods contained in 40 CFR 60, Appendix A
ESP	Electrostatic Precipitator
EU	emission unit
FCAA	Federal Clean Air Act
gr	grains
HAP	hazardous air pollutant
HCFC	Hydro-Chlro-Fluro Carbons
IEU	insignificant emission unit
Mbdft	thousand Board feet
MCA	Montana Code Annotated
Method 5	40 CFR 60, Appendix A, Method 5
Method 9	40 CFR 60, Appendix A, Method 9
MMbdft	million Board feet
MMBTU	million British Thermal Units
NO_x	oxides of nitrogen
NO_2	nitrogen dioxide
NSPS	New Source Performance Standard
O_2	oxygen
OCC	Old CardBoard Container
ODP	Oven Dried Pulp
ODT	Oven Dried Ton
ORSAT	Name brand of the analyzer
Pb	lead
PM	particulate matter
PM10	particulate matter less than 10 microns in size
psi	pounds per square inch
RACT	Reasonably Available Control Technology
scf	standard cubic feet
SIC	Source Industrial Classification
SO_2	sulfur dioxide
SO_x	oxides of sulfur
tpy	tons per year
TRS	Total Reduced Sulfur

U.S.C.	United States Code
VE	visible emissions
VOC	volatile organic compound

APPENDIX C NOTIFICATION ADDRESSES

Compliance Notifications:

Montana Department of Environmental Quality
Permitting and Compliance Division
Air Resources Management Bureau
P.O. Box 200901
Helena, MT 59620-0901

United States EPA
Air Program Coordinator
Region VIII, Montana Office
10 W. 15th Street, Suite 3200
Helena, MT 59626

Permit Modifications:

Montana Department of Environmental Quality
Permitting and Compliance Division
Air Resources Management Bureau
P.O. Box 200901
Helena, MT 59620-0901

Office of Partnerships and Regulatory Assistance
Air and Radiation Program
US EPA Region VIII 8P-AR
999 18th Street, Suite 300
Denver, CO 80202-2466

APPENDIX D AIR QUALITY INSPECTOR INFORMATION

Disclaimer: The information in this appendix is not State or Federally enforceable but is presented to assist Smurfit-Stone, permitting authority, inspectors, and the public.

1. **Direction to Plant:** The facility is located at 14377 Pulp Mill Road, Missoula, Montana. This is near Frenchtown, Montana, which is 10 miles northwest of Missoula.

2. **Safety Equipment Required:** While on site, safety glasses, steel toed shoes, and ear protection are required. A Smurfit-Stone staff member will cover any other recommended safety instructions prior to entering the plant.

3. **Facility Plot Plan: A** copy of the facility plot plan is on file with the Department and was submitted with the application on June 7, 1996.

APPENDIX E
TEST PLAN FOR DETERMINING BACK-HALF EMISSIONS

Smurfit-Stone and the Air Resources Management Bureau (ARMB) have worked together to develop the following test plan to determine back-half emissions from the recovery boilers and hog fuel boiler. The following assumptions were made at the beginning of the test plan:

1. For the purposes of this test plan, particulate formation from SO_2 will not be considered. However, if the SIP requires a demonstration of the impact of SO_2 particulate conversion on the nonattainment area, the ARMB intends to use SO_2 emissions reported by the CEMS on the #3, #4, and #5 Recovery Boilers, and the Multi-fuel Boiler to determine actual SO_2 emissions. These emissions will be modeled using a conversion rate based on the best available information at the time of the modeling to determine the impact of SO_2 precursors. Modeling of this sort has been done in Utah as part of their PM-10 non-attainment modeling, with the assumption that 100% of the SO_2 is converted to particulate in the nonattainment area.

2. Smurfit-Stone shall perform back-half tests on the #3 and #4 Recovery Boilers. If the data shows the emissions from these two sources to be similar and to be representative of recovery boilers, then the back-half emissions from the #5 recovery boiler will be assumed to be the same. If the test information from the two sources shows significant disparity, then additional testing may be required for the #5 recovery boiler.

3. Smurfit-Stone shall cover the Multi-fuel Boiler back-half emissions as a separate issue.

Based on these assumptions, the following plan was developed.

Back-half Testing Plan

Start date: Third calendar quarter of 1993.

Test Schedule:

As part of quarterly compliance tests for these sources:
#3 Recovery Boiler
#4 Recovery Boiler

Capacity: Each source shall be tested at 90% of maximum rated capacity once a year. Additional tests shall be conducted at the maximum operating rate of the equipment for the proceeding calendar quarter, not including the operating rate during stack test days.

Methods: EPA approved methods:

Method 5 (front-half emissions)
Method 202 (back-half emissions)

Protocol: All testing shall be done in accordance with the Montana Source Test Protocol and 40 CFR Part 60, Appendix A.

Smurfit-Stone shall submit a testing protocol to the ARMB prior to testing as required in the Montana Source Test Protocol. This protocol shall include any variations from the methods and should include information such as use of a glass probe during testing.

Format of Tests:

The ARMB will allow Smurfit-Stone to conduct testing over a 2-day period, but prefers that testing be done in 1 day. Timing of planned tests shall be included as part of the protocol.

Review

Test Results: Smurfit-Stone shall submit all test results to the ARMB. Test reports shall contain information on process rate, all raw data, calculations, and analysis.

Plan Review: Smurfit-Stone and the ARMB shall review the results of the test plan after 1 year (or four quarters) of data has been collected to determine:

1. Need for continuing collection of information.
2. Additional points needed to fill in information.
3. Relationship between emissions and capacity of equipment.

Conclusions

At the end of the test plan (expected to be approximately the end of 1994), the ARMB and Smurfit-Stone will work together to determine the need for additional emission limitations for the #3, #4, and #5 Recovery Boilers. The ARMB and Smurfit-Stone will also work together to determine appropriate emission limitations. If needed, the emission limitations are expected to be identified as a total limit for each source, which will be in addition to existing front-half limits.

The ARMB and Smurfit-Stone shall also work together to determine the appropriate schedule for future testing for back-half or total emissions.

APPENDIX F
AMBIENT AIR MONITORING PLAN

1. This ambient air monitoring plan is required by air quality Permit #2589-08, which applies to the Smurfit-Stone Kraft pulp mill operation located approximately 10 miles northwest of Missoula, Montana. This monitoring plan may be modified by the Department. All requirements of this plan are considered conditions of the permit.

2. Smurfit-Stone shall operate and maintain two air monitoring sites in the vicinity of the mill and facilities. The exact locations of the monitoring sites must be approved by the Department and meet all the siting requirements contained in the Montana Quality Assurance Manual, including revisions; the EPA Quality Assurance Manual, including revisions; and Parts 53 and 58 of the Code of Federal Regulations; or any other requirements specified by the Department.

3. Smurfit-Stone shall continue air monitoring for at least 2 years after normal production is achieved. The air monitoring data will be reviewed by the Department and the Department will determine if continued monitoring or additional monitoring is warranted. The Department may require continued air monitoring to track long-term impacts of emissions from the facility or require additional ambient air monitoring or analyses if any changes take place in regard to quality and/or quantity of emissions or the area of impact from the emissions.

4. Smurfit-Stone shall monitor the following parameters at the sites and frequencies described below:

AIRS # and Site Name	UTM Coordinates	Parameter	Frequency
30-063-0034	Zone 11		
Moccasin	N 520 3200	PM-10[1]	Every 3rd/6th day[3]
Lane #1A	E 719 000	PM-10 collocated[2]	Every 6th day
		H_2S[4]	Continuous
		Wind speed and	"
		direction, standard	"
		deviation of Wind	"
		direction (sigma theta)	"
30-063-0016	Zone 11		
Well Field #2	N 520 2351	PM-10	Every 3rd/6th day
	E 712 804	H_2S	Continuous

[1] PM-10 = particulate matter less than 10 microns.
[2] The requirement for a collocated PM-10 sampler may be waived if the monitor operator operates a collocated PM-10 sampler at another site.
[3] Every 3rd day during October-March; every 6th day during April-September.
[4] H_2S = hydrogen sulfide.

Trace metal analyses of sample filters will not be required at this time; however, the Department may require these analyses in the future.
Data recovery for all parameters shall be at least 80 percent computed on a quarterly and annual basis. The Department may require continued monitoring if this condition is not met.

5. Any ambient air monitoring changes proposed by Smurfit-Stone must be approved, in writing, by the Department.

6. Smurfit-Stone shall utilize air monitoring and quality assurance procedures which are equal to or exceed the requirements described in the Montana Quality Assurance Manual, including revisions; the EPA Quality Assurance Manual, including revisions; 40 CFR Parts 53 and 58 of the Code of Federal Regulations; and any other requirements specified by the Department.

7. Smurfit-Stone shall submit quarterly data reports within 45 days after the end of the calendar quarter and an annual data report within 90 days after the end of the calendar year. The annual report may be substituted for the fourth quarterly report if all information in 8 below is included in the report.

8. The quarterly report shall consist of a narrative data summary and a data submittal of all data points on AIRS formatted paper input forms, disks or magnetic tapes which are compatible with the Department's computer system. The narrative data summary shall include:

   a. A topographic map of appropriate scale with UTM coordinates and a true north arrow showing the air monitoring site locations in relation to the mill and facilities and the general area;

   b. A hard copy of the individual data points;

   c. The quarterly and monthly means for PM-10 and wind speed;

   d. The first and second highest 24-hour concentrations for PM-10 at each site;

   e. The first and second highest hourly concentrations for H_2S at each site;

   f. The quarterly and monthly wind roses;

   g. A summary of the data collection efficiency;

   h. A summary of the reasons for missing data;

   i. A precision and accuracy (audit) summary;

   j. A summary of any ambient air standard exceedances; and

   k. Calibration information.

9. The annual data report shall consist of a narrative data summary containing:

   a. A topographic map of appropriate scale with UTM coordinates and a true north arrow showing the air monitoring site locations in relation to the mill and facilities and the general area;

   b. A pollution trend analysis;

   c. The annual means for PM-10 per site and wind speed;

   d. The first and second highest 24-hour concentrations for PM-10 at each site;

   e. The first and second highest hourly H_2S concentrations at each site;

   f. The annual wind rose;

g. An annual summary of data collection efficiency;

h. An annual summary of precision and accuracy (audit) data;

i. An annual summary of any ambient standard exceedance; and

j. Recommendations for future monitoring.

10. The Department may audit, or may require Smurfit-Stone to contract with an independent firm to audit, the air monitoring network, the laboratory performing associated analyses, and any data handling procedures at unspecified times. On the basis of the audits and subsequent reports, the Department may recommend or require changes in the air monitoring network and associated activities in order to improve precision, accuracy and data completeness.