**Texas Commission on Environmental Quality**

**Form OP-UA30**

**Kraft, Soda, Sulfite, and Stand-Alone**

**Semichemical Pulp Mill Attributes**

General:

This form is used to provide a description and data pertaining to all affected units at kraft, soda, sulfite, and stand-alone semichemical pulp mills with potentially applicable requirements associated with a particular regulated entity number and application. Each table number, along with the possibility of a corresponding letter (i.e., Table 1a, Table 1b), corresponds to a certain state or federal rule. If the rule on the table is not potentially applicable to a kraft pulp mill, then it should be left blank and need not be submitted with the application. If the codes entered by the applicant show negative applicability to the rule or sections of the rule represented on the table, then the applicant need not complete the remainder of the table(s) that corresponds to the rule. Further instruction as to which questions should be answered and which questions should not be answered are located in the “Specific” section of the instruction text. The following is included in this form:

**Table 1a - 1b:** Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

Subpart BB: Standards of Performance for Kraft Pulp Mills

**Table 2:** Title 30 Texas Administrative Code Chapter 112 (30 TAC Chapter 112)

Control of Total Reduced Sulfur

**Tables 3a - 3b:** Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart MM: National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills

The Texas Commission on Environmental Quality (TCEQ) Regulated Entity Number (RNXXXXXXXXX) and the application area name from Form OP-1 (Site Information Summary) must appear in the header of each page for the purpose of identification for the initial submittal. The date of the initial form submittal must also be included and should be consistent throughout the application (MM/DD/YYYY). **Leave the permit number blank for the initial form submittal.** If this form is included as part of the permit revision process, enter the permit number assigned by the TCEQ, the area name (from Form OP-1), the date of the revision submittal, and the regulated entity number.

Unit attribute questions that do not require a response from all applicants are preceded by qualification criteria in the instructions. If the unit does not meet the qualification criteria, a response to the question is not required. **Anytime a response is not required based on the qualification criteria, leave the space on the form blank.**

**Notwithstanding any qualification criteria in the form instructions or information provided in other TCEQ guidance, the applicant may leave an attribute question blank (or indicate “N/A” for “Not Applicable”) if the attribute is not needed for the applicable requirement determinations of a regulation for a unit.**

In some situations, the applicant has the option of selecting alternate requirements, limitations, and/or practices for a unit. Note that these alternate requirements, limitations, and/or practices must have the required approval from the TCEQ Executive Director and/or the U.S. Environmental Protection Agency Administrator before the federal operating permit application is submitted.

The TCEQ requires that a Core Data Form be submitted on all incoming registrations unless a Regulated Entity and Customer Reference Number have been issued by the TCEQ and no core data information has changed. If a Regulated Entity or Customer Number has been issued, then the number must be noted on the request or applicable form. For more information regarding the Core Data Form, call (512) 239-5175 or go to the TCEQ Web site at [www.tceq.texas.gov/permitting/central\_registry](http://www.tceq.texas.gov/permitting/central_registry).

Specific:

**Table 1a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**

Subpart BB: Standards of Performance for Kraft Pulp Mills

Unit ID No.: Enter the identification number (ID No.) for the unit at a kraft pulp mill (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

SOP Index No.: Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please refer to the TCEQ website at [www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\_V/sop\_initial.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_initial.pdf).

Facility Type: Select one of the following options to describe the facility type. Enter the code on the form.

Code Description

SKRFUR Straight kraft recovery furnace

CRFUR Cross recovery furnace

SDTNK Smelt dissolving tank

LKILN Lime kiln

DIG Digester

BSW Brown stock washer

MEES Multiple effect evaporator

CONS Condensate stripper

Construction/Modification Date**:** Enter one of the following options that describe the date of commencement of the most recent construction or modification. Enter the code on the form.

Code Description

76- Affected source was constructed/modified on or before September 24, 1976

76+ Affected source was constructed/modified after September 24, 1976

* Continue only if “Construction/Modification Date” is “76+.”

Kraft Pulping Combination**:** Enter “YES” if kraft pulping is combined with neutral sulfite semi-chemical pulping. Otherwise, enter “NO.”

* Complete “Material Origin” only if “Kraft Pulping Combination” is “YES.”

Material Origin**:** Enter “YES” if any portion of the material charged to an affected facility is produced by the kraft pulping operation. Otherwise, enter “NO.”

* Complete the rest of Table 1a only if “Facility Type” is “SDTNK” or “LKILN.”

Scrubber: Enter “YES” if the smelt dissolving tank uses a scrubber emission control device. Otherwise, enter “NO.”

* Complete “Control Device ID No.” only if “Facility Type” is “LKILN.”

Control Device ID No.: Enter the identification number (ID No.) for the control device to which emissions are routed (maximum 10 characters). This number should be consistent with the control device identification number listed on Form OP-SUM. If there is not a control device, then leave this column blank.

Fuel Type: Enter one of the following options to describe the type of fuel burned in the lime kiln.

Code Description

GAS Gaseous fossil fuel

LIQ Liquid fossil fuel

OTHER Other fuel type

Table 1b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

Subpart BB: Standards of Performance for Kraft Pulp Mills

* Complete only if “Construction/Modification Date” is “76+” and “Facility Type” is “DIG,” “BSW,” “MEES,” or “CONS.”

Unit ID No.: Enter the identification number (ID No.) for the unit at a kraft pulp mill (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

SOP Index No.: Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please refer to the TCEQ website at [www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\_V/sop\_initial.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_initial.pdf).

Gas Control Techniques**:** Select one of the following options to describe the control technique used to control gases from the facility. Enter the code on the form.

Code Description

CLK Gases are combusted in a lime kiln subject to 40 CFR § 60.283(a)(5)

CRF Gases are combusted in a recovery furnace subject to 40 CFR § 60.283(a)(2) or (a)(3)

INC/CMB Gases are combusted with other waste gases in an incinerator or other combustion device

LK/RF Gases are combusted in a lime kiln or recovery furnace not subject to 40 CFR Part 60, Subpart BB

NONCOM Gases are controlled by a non-combustion control technique

NONE None

Control Device ID No.: Enter the identification number (ID No.) for the control device to which emissions are routed (maximum 10 characters). This number should be consistent with the control device identification number listed on Form OP-SUM. If there is not a control device, then leave this column blank.

* Complete “Minimum Temperature” only if “Gas Control Technique” is “INC/CMB” or “LK/RF.”

Minimum Temperature: Enter “YES” if the gases are subject to a minimum temperature of 1200̊F for at least 0.5 seconds. Otherwise, enter “NO.”

* Continue only if “Gas Control Technique” is “NONCOM” or “NONE”; or if “Gas Control Technique” is “INC/CMB” or “LK/RF” and “Minimum Temperature” is “NO.”
* Complete Feasibility only if “Facility Type” is “BSW.”

Feasibility: Enter “YES” if incineration of the exhaust gases from a brown stock washer has been demonstrated to be technologically or economically unfeasible. Otherwise, enter “NO.”

* Complete “Uncontrolled Gas” only if “Facility Type” is “DIG.”

Uncontrolled Gas: Enter “YES” if uncontrolled gas from a digester contains total reduced sulfur less than 0.005 g/kg air dried unbleached pulp (ADP) (0.01 lb/ton ADP). Otherwise, enter “NO.”

Table 2: Title 30 Texas Administrative Code Chapter 112 (30 TAC Chapter 112)

Control of Air Pollution from Sulfur Compounds

Unit ID No.: Enter the identification number (ID No.) for the unit at a kraft pulp mill (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

SOP Index No.: Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please refer to the TCEQ website at [www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\_V/sop\_initial.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_initial.pdf).

Facility Type: Select one of the following options to describe the facility type. Enter the code on the form.

Code Description

ODFUR Old design furnace

NDFUR New design furnace

CRFUR Cross recovery furnace

SDTNK Smelt dissolving tank

LKILN Lime kiln

DIG Digester

MEES Multiple effect evaporator

CONS Condensate stripper

NONE None of the above

Alternate Emission Limitation: Enter “YES” if an alternate emission limitation (AEL) has been approved by the TCEQ Executive Director. Otherwise, enter “NO.”

AEL ID No.: If an AEL has been approved by the TCEQ Executive Director, then enter the corresponding AEL unique identifier for each unit (maximum 10 characters). If the unique identifier is unavailable, then enter the date of the AEL approval letter in the table column. The unique identifier and/or the date of approval letter is contained in the compliance file under the appropriate regulated entity number. Otherwise, leave this column blank.

Table 3a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart MM: National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills

Unit ID No.: Enter the identification number (ID No.) for the unit at a kraft, soda, sulfite, or stand-alone semichemical pulp mill (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

SOP Index No.: Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please refer to the TCEQ website at [www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\_V/sop\_initial.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_initial.pdf).

Source Type: Select one of the following options to describe the source type. Enter the code on the form.

For kraft or soda pulp mills:

Code Description

DCE Direct contact evaporator (DCE) recovery furnace

NDCE Nondirect contact evaporator (NDCE) recovery furnace

SDTNK Smelt dissolving tank

LKILN Lime kiln

For sulfite pulp mills:

Code Description

SULF Sulfite combustion unit

For stand-alone semichemical pulp mills:

Code Description

SEMI Semichemical combustion unit

New or Existing Source**:** Select one of the following options to describe the source. Enter the code on the form.

Code Description

NEW New source

EX Existing source

* Complete “Kraft or Soda Source Alternative” only if “Source Type” is “DCE,” “NDCE,” “SDTNK,” or “LKILN” and “New or Existing Source” is “EX.”

Kraft or Soda Source Alternative: Enter “YES” if the source at an existing kraft or soda pulp mill operates 6,300 hours per year or more and is complying with the requirements of 40 CFR § 63.862(a)(1)(ii). Otherwise, enter “NO.”

* Complete “Subject to 40 CFR § 60.282” only if “Alternative” is “YES.”

Subject To 40 CFR § 60.282**:** Enter “YES” if the source is subject to 40 CFR § 60.282. Otherwise, enter “NO.”

Table 3b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart MM: National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills

Unit ID No.: Enter the identification number (ID No.) for the unit at a kraft, soda, sulfite, or stand-alone semichemical pulp mill (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

SOP Index No.: Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please refer to the TCEQ website at [www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\_V/sop\_initial.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_initial.pdf).

Control System: Select one of the following control techniques used for source type. Enter the code on the form.

For Source Types “DCE,” “NDCE,” and “LKILN”:

Code Description

SCRUB Wet scrubber

ESP Electrostatic precipitator

OTHER Alternative emission control system approved by the EPA Administrator

For Source Types “SDTNK” and “SULF”:

Code Description

SCRUB Wet scrubber

OTHER Alternative emission control system approved by the EPA Administrator

For Source Type “SEMI:”

Code Description

RTO Regenerative thermal oxidizer

OTHER Alternative emission control system approved by the EPA Administrator

Control Device ID No.: Enter the identification number (ID No.) for the control device to which emissions are routed (maximum 10 characters). This number should be consistent with the control device identification number listed on Form OP-SUM. If there is not a control device, then leave this column blank.

Alternative Operating Parameter**:** Enter “YES” if the owner or operator has received prior approval from the EPA Administrator to monitor an alternative control device operating parameters. Otherwise, enter “NO.”

* Complete “Alternative ID No.” only if “Control System” is “OTHER” or “Alternative Operating Parameter” is “YES.”

Alternative ID No.: If an alternative has been approved by the EPA Administrator, then enter the corresponding unique identifier for each unit (maximum 10 characters). If the unique identifier is unavailable, then enter the date of the approval letter in the table column. The unique identifier and/or the date of approval letter is contained in the compliance file under the appropriate regulated entity number. Otherwise, leave this column blank.

Subject To 40 CFR PART 63, SUBPART S**:** Enter “YES” if the source is also subject to 40 CFR Part 63, Subpart S. Otherwise, enter “NO.”

**Texas Commission on Environmental Quality**

**Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes**

**Form OP-UA30 (Page 1)**

**Federal Operating Permit Program**

**Table 1a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**

**Subpart BB: Standards of Performance for Kraft Pulp Mills**

| ****Date:**** | ****Permit No.:**** | ****Regulated Entity No.:**** |
| --- | --- | --- |
| ****Area Name:**** | ****Customer Reference No.:**** |

| **Unit ID No.** | **SOP Index No.** | **Facility Type** | **Construction/ Modification Date** | **Kraft Pulping Combination** | **Material Origin** | **Scrubber** | **Control Device ID No.** | **Fuel Type** |
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**Texas Commission on Environmental Quality**

**Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes**

**Form OP-UA30 (Page 2)**

**Federal Operating Permit Program**

**Table 1b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**

**Subpart BB: Standards of Performance for Kraft Pulp Mills**

| ****Date:**** | ****Permit No.:**** | ****Regulated Entity No.:**** |
| --- | --- | --- |
| ****Area Name:**** | ****Customer Reference No.:**** |

| **Unit ID No.** | **SOP Index No.** | **Gas Control Technique** | **Control Device ID No.** | **Minimum Temperature** | **Feasibility** | **Uncontrolled Gas** |
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**Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes**

**Form OP-UA30 (Page 3)**

**Federal Operating Permit Program**

**Table 2: Title 30 Texas Administrative Code Chapter 112 (30 TAC Chapter 112) Control of Total Reduced Sulfur**

| ****Date:**** | ****Permit No.:**** | ****Regulated Entity No.:**** |
| --- | --- | --- |
| ****Area Name:**** | ****Customer Reference No.:**** |

| **Unit ID No.** | **SOP Index No.** | **Facility Type** | **Alternate Emission Limitation** | **AEL ID No.** |
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**Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes**

**Form OP-UA30 (Page 4)**

**Federal Operating Permit Program**

**Table 3a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**

**Subpart MM: National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand‑Alone Semichemical Pulp Mills**

| ****Date:**** | ****Permit No.:**** | ****Regulated Entity No.:**** |
| --- | --- | --- |
| ****Area Name:**** | ****Customer Reference No.:**** |

| **Unit ID No.** | **SOP Index No.** | **Source Type** | **New or Existing Source** | **Kraft or Soda Source Alternative** | **Subject to 40 CFR § 60.282** |
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**Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes**

**Form OP-UA30 (Page 5)**

**Federal Operating Permit Program**

**Table 3b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**

**Subpart MM: National Emission Standards for Hazardous Air Pollutants for Chemical Recovery**

**Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills**

| ****Date:**** | ****Permit No.:**** | ****Regulated Entity No.:**** |
| --- | --- | --- |
| ****Area Name:**** | ****Customer Reference No.:**** |

| **Unit ID No.** | **SOP Index No.** | **Control System** | **Control Device ID No.** | **Alternative Operating Parameter** | **Alternative ID No.** | **Subject to 40 CFR Part 63, Subpart S** |
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