



Texas Commission on Environmental Quality
Form OP-UA61 - Instructions
Pulp, Paper, or Paperboard
Producing Process Attributes

General:

This form is used to provide a description and data pertaining to all pulp, paper, or paperboard producing processes with potentially applicable requirements associated with a particular account 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 pulp, paper, or paperboard producing process, 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:

Tables 1a - 1d: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart S: National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry

The application area name from Form OP-1 entitled, "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), and the date of the revision submittal.

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 Texas Commission on Environmental Quality (TCEQ) requires that a Core Data Form be submitted on all incoming registrations unless all of the following are met: the Regulated Entity and Customer Reference Numbers have been issued by the TCEQ and no core data information has changed. The Central Registry, a common record area of the TCEQ which maintains information about TCEQ customers and regulated activities, such as company names, addresses, and telephone numbers. This information is commonly referred as "core data." The Central Registry provides the regulated community with a central access point within the agency to check core data and make changes when necessary. When core data about a facility is moved to the Central Registry, two new identification numbers are assigned: the Customer Reference (CN) number and the Regulated Entity (RN) number. The Core Data Form is required if facility records are not yet part of the Central Registry or if core data for a facility has changed. If this is the initial registration, permit, or license for a facility site, then the Core Data Form must be completed and submitted with application or registration forms. If amending, modifying, or otherwise updating an existing record for a facility site, the Core Data Form is not required, unless any core data information has changed. To review additional information regarding the Central Registry, go to the TCEQ Web site at www.tceq.state.tx.us/nav/permits/.

Specific:

**Table 1a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart S: National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry**

★ **Complete only for plant sites that are a major source, as defined in 40 CFR § 63.2.**

PROCESS ID NO.: Enter the identification number (ID No.) for the pulp, paper, or paperboard producing process (maximum 10 characters) as listed on Form OP-SUM, entitled "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 guidance document entitled "Federal Operating Permit Application Guidance Document."

PROCESS: Select one of the following options that describes the type of process. Enter the code on the form.

<u>Code</u>	<u>Description</u>
KRAFT	Kraft pulping process using wood
SULFI	Sulfite pulping process using wood
SODA	Soda or semi-chemical pulping process using wood
MECH+	Mechanical pulping process using wood or any process using secondary or non-wood fibers which includes a bleaching system using chlorine dioxide
MECH-	Mechanical pulping process using wood or any process using secondary or non-wood fibers which does not include a bleaching system using chlorine dioxide
BLEAC	Process other than the ones listed above which includes a bleaching system using chlorine dioxide
OTHER	Process other than the ones listed above which does not include a bleaching system using chlorine dioxide

▼ **Do Not Continue if "Process" is "MECH-" or "OTHER."**

BY-PASS LINE: Enter "YES" if the process uses a by-pass line in the closed vent system that could divert vent streams containing hazardous air pollutants to the atmosphere without meeting emission limitation requirements. Otherwise, enter "NO."

★ **Complete "Flow Indicator" Only if "By-Pass Line" is "YES."**

FLOW INDICATOR: Enter "YES" if a flow indicator is installed in the by-pass line. Otherwise, enter "NO."

ALTERNATIVE MONITORING: Enter "YES" if control devices or alternative parameters are being used. Otherwise, enter "NO."

★ **Do Not Complete the Rest of Tables 1a Through 1c Only if "Process" is "BLEAC" or "MECH+" and go to Table 1d.**

CONSTRUCTION DATE: Select one of the following options that describes the date of commencement of the most recent construction or reconstruction. Enter the code on the form.

<u>Code</u>	<u>Description</u>
93-	On or before December 17, 1993
93+	After December 17, 1993

**Table 1b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart S: National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry**

PROCESS ID NO.: Enter the identification number (ID No.) for the pulp, paper, or paperboard producing process (maximum 10 characters) as listed on Form OP-SUM, entitled "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 guidance document entitled "Federal Operating Permit Application Guidance Document."

★ **Complete "Clean Condensate Alternative" Only if "Process" is "KRAFT."**

CLEAN CONDENSATE ALTERNATIVE: Enter "YES" if the affected source uses a clean condensate alternative, approved by the EPA Administrator, that achieves total hazardous air pollutant (HAP) emissions reductions greater than or equal to the total HAP emission reductions that would have been achieved by compliance with 40 CFR § 63.443(a)(1)(ii) - (v). Otherwise, enter "NO."

ALTERNATIVE ID NO.: If a clean condensate alternative has been approved, then enter the corresponding alternative unique identifier (maximum 10 characters) for each unit or process. If the unique identifier is unavailable, then enter the date of the alternative approval letter. The unique identifier and/or the date of the approval letter are contained in the Compliance File under the appropriate account number. Otherwise, leave this column blank.

★ **Complete "Control Device at a Kraft, Soda, or Semi-chemical Process" Only if "Process" is "KRAFT" or "SODA" from Table 1a.**

CONTROL DEVICE AT A KRAFT, SODA, OR SEMI-CHEMICAL PROCESS: Select one of the following options that describes the method of demonstrating reduction of hazardous air pollutant (HAP) emissions. Enter the code on the form.

<u>Code</u>	<u>Description</u>
WEI	Reduce total HAP emissions by 98 percent or more by weight
VOL	Reduce the total HAP concentration at the outlet of the thermal oxidizer to 20 parts per million or less by volume, corrected to 10 percent oxygen on a dry basis
THOX	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
BOIL	Reduce total HAP emissions using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone
BOIL44	Reduce total HAP emissions using a boiler or recovery furnace with a heat input capacity greater than or equal to 44 megawatts by introducing the HAP emission stream with the combustion air.

★ **Do Not Complete the Rest of Tables 1b Through 1c Only if "Process" is "SODA" and go to Table 1d.**

★ **Complete "Sulfite Pulping Process" Only if "Process" is "SULFI."**

SULFITE PULPING PROCESS: Select one of the following options that describes the method of demonstrating reduction of HAP emissions. Enter the code on the form.

<u>Code</u>	<u>Description</u>
CBE	Calcium-based or sodium-based sulfite pulping process emitting less than or equal to 0.44 kilograms of total HAP or methanol per megagram (0.89 pounds per ton) of oven-dried pulp
CBR	Calcium-based or sodium-based sulfite pulping process which removes 92 percent or more by weight of the total HAP or methanol
MBE	Magnesium-based or ammonium-based sulfite pulping process emitting less than or equal to 1.1 kilograms of total HAP or methanol per megagram (2.2 pounds per ton) of oven-dried pulp
MBR	Magnesium-based or ammonium-based sulfite pulping process which removes 87 percent or more by weight of the total HAP or methanol

★ **If "Process" is "SULFI" then go to Table 1d.**

**Table 1c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart S: National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry**

PROCESS ID NO.: Enter the identification number (ID No.) for the pulp, paper, or paperboard producing process (maximum 10 characters) as listed on Form OP-SUM, entitled “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 guidance document entitled “Federal Operating Permit Application Guidance Document.”

PULPING PROCESS CONDENSATES: Select one of the following options that describes the control of the pulping process condensates. Enter the code on the form.

<u>Code</u>	<u>Description</u>
NONE	Condensates are not generated from equipment in 40 CFR § 63.446(b)(1) - (5) or specified equipment is not used in the pulping process
CNTRL	Condensates generated from equipment in 40 CFR § 63.446(b)(1) - (5) are being controlled
NOCNTRL	Condensates generated from equipment in 40 CFR § 63.446(b)(1) - (5) are not being controlled

★ If “Pulping Process Condensates” is “NONE” then go to Table 1d.

★ Complete the “Condensate Segregation Method” Only if “Pulping Process Condensates” is “NOCNTRL.”

CONDENSATE SEGREGATION METHOD: Enter “YES” if the condensate segregation method in 40 CFR § 63.446(c)(2) is being used. Otherwise, enter “NO.”

CONDENSATE CONTROL TANK: Enter “YES” if a condensate tank is used in the collection system. Otherwise, enter “NO.”

CONDENSATE TREATMENT: Select one of the following options that describes the treatment of the condensate from the pulping process equipment. Enter the code on the form.

<u>Code</u>	<u>Description</u>
RECYC	Recycle the pulping process condensate to an equipment system specified in 40 CFR § 63.443(a) meeting the requirements specified in 40 CFR § 63.443(c) and (d)
PTREAT	Treat the pulping process condensates to reduce or destroy the total hazardous air pollutants (HAPs) by at least 92 percent or more by weight and discharging the pulping process condensate below the liquid surface of a biological treatment system meeting the requirement specified in 40 CFR § 63.446 (e)(3)
PREM	At mills that do not perform bleaching, treat the pulping process condensates to remove 3.3 kilograms or more of total HAP per megagram (6.6 pounds per ton) of oven-dried pulp, or achieve a total HAP concentration of 210 parts per million or less by weight at the outlet of the control device and discharging the pulping process condensate below the liquid surface of a biological treatment system meeting the requirement specified in 40 CFR § 63.446(e)(3)
PREM-B	At mills that perform bleaching, treat the pulping process condensates to remove 5.1 kilograms or more of total HAP per megagram (10.2 pounds per ton) of oven-dried pulp, or achieve a total HAP concentration of 330 parts per million or less by weight at the outlet of the control device and discharging the pulping process condensate below the liquid surface of a biological treatment system meeting the requirement specified in 40 CFR § 63.446(e)(3)
SSTREAT	Treat the pulping process condensates to reduce or destroy the total HAPs by at least 92 percent or more by weight utilizing a steam stripper

SSREM	At mills that do not perform bleaching, treat the pulping process condensates to remove 3.3 kilograms or more of total HAP per megagram (6.6 pounds per ton) of oven-dried pulp, or achieve a total HAP concentration of 210 parts per million or less by weight at the outlet of the control device utilizing a steam stripper
SSREM-B	At mills that perform bleaching, treat the pulping process condensates to remove 5.1 kilograms or more of total HAP per megagram (10.2 pounds per ton) of oven-dried pulp, or achieve a total HAP concentration of 330 parts per million or less by weight at the outlet of the control device utilizing a steam stripper
TREAT	Treat the pulping process condensates to reduce or destroy the total HAPs by at least 92 percent or more by weight without utilizing a steam stripper
REM	At mills that do not perform bleaching, treat the pulping process condensates to remove 3.3 kilograms or more of total HAP per megagram (6.6 pounds per ton) of oven-dried pulp, or achieve a total HAP concentration of 210 parts per million or less by weight at the outlet of the control device without utilizing a steam stripper
REM-B	At mills that perform bleaching, treat the pulping process condensates to remove 5.1 kilograms or more of total HAP per megagram (10.2 pounds per ton) of oven-dried pulp, or achieve a total HAP concentration of 330 parts per million or less by weight at the outlet of the control device without utilizing a steam stripper

★ If “Condensate Treatment” is “RECYC” then go to Table 1d.

★ Complete “Mixed Pond” Only if “Condensate Treatment” is “PTREAT,” “PREM,” or “PREM-B.”

MIXED POND: Enter “YES” if the biological treatment pond is non-thoroughly mixed. Otherwise, enter “NO.”

★ Complete “Daily Monitoring Procedures” Only if “Condensate Treatment” is “PTREAT,” “PREM,” or “PREM-B.”

DAILY MONITORING PROCEDURES: Select one of the following options that describes the daily monitoring procedures. Enter the code on the form.

<u>Code</u>	<u>Description</u>
453J1	Comply with the monitoring and sampling requirements specified in 40 CFR § 63.453(j)(1)(i) and (ii)
453J2	As an alternative to the monitoring requirements of paragraph 40 CFR § 63.453(j)(1), conduct daily monitoring of the site-specific parameters established according to the procedures specified 40 CFR § 63.453(n).

★ Complete “Alternative Continuous Monitoring System” Only if “Condensate Treatment” is “SSREM” or “SSREM-B.”

ALTERNATIVE CONTINUOUS MONITORING SYSTEM: Enter “YES” if the affected source uses an alternative continuous monitoring system to measure the methanol outlet concentration as an option to the requirements specified in 40 CFR § 63.453(g). Otherwise, enter “NO.”

**Table 1d: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart S: National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry**

PROCESS ID NO.: Enter the identification number (ID No.) for the pulp, paper, or paperboard producing process (maximum 10 characters) as listed on Form OP-SUM, entitled “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 guidance document entitled “Federal Operating Permit Application Guidance Document.”

BLEACHING SYSTEM: Enter “YES” if the bleaching system from the kraft, sulfite, or soda process uses chlorinated compounds. Otherwise, enter “NO.”

▼ **Do Not Continue if “Bleaching System” is “NO.”**

REDUCTION OF CHLORINATED HAP EMISSIONS: Select one of the following options that describes the reduction of chlorinated hazardous air pollutant (HAP) emissions. Enter the code on the form.

<u>Code</u>	<u>Description</u>
VOL	Achieve a treatment device outlet concentration of 10 parts per million or less by volume of total chlorinated HAP
MASS	Achieve a treatment device outlet mass emission rate of 0.001 kg of total chlorinated HAP mass per megagram (0.002 pounds per ton) of oven-dried pulp
WEI	Reduce the total chlorinated HAP mass in the vent stream entering the control device by 99 percent or more by weight

★ **Complete “Monitoring Parameters” Only if “Reduction of Chlorinated Hap Emissions” is “VOL.”**

MONITORING PARAMETERS: Select one of the following options that describes the method of compliance with the bleaching system requirements of 40 CFR § 63.445(c) or the sulfite pulping system requirements of 40 CFR § 63.444(c). Enter the code on the form.

<u>Code</u>	<u>Description</u>
CMS	Complying with 40 CFR § 63.453(c)
OPTION	Complying with 40 CFR § 63.453(d)

BLEACHING PLANT PROVISIONS: Select one of the following options that describes the method of compliance with the effluent limitation guidelines and standards in 40 CFR § 430.24. Enter the code on the form.

<u>Code</u>	<u>Description</u>
2001	Complying with 40 CFR § 63.440(d)(3)(i)
2004	Complying with 40 CFR § 63.440(d)(3)(ii)

★ **Complete “Hypochlorite or Chlorine Bleaching” Only if “Bleaching Plant Provisions” is “2001.”**

HYPOCHLORITE OR CHLORINE BLEACHING: Enter “YES” if hypochlorite or chlorine is used in the bleaching systems and lines as specified in 40 CFR § 63.445. Otherwise, enter “NO.”

★ **Complete “Method of Reducing Chloroform Air Emissions” Only if “Hypochlorite or Chlorine Bleaching” is “YES” or “Bleaching Plant Provisions” is “2004.”**

METHOD OF REDUCING CHLOROFORM AIR EMISSIONS: Select one of the following options that describes the method being used to reduce chloroform air emissions from the bleaching system to the atmosphere. Enter the code on the form.

<u>Code</u>	<u>Description</u>
DGK	Dissolving-grade kraft bleaching systems and lines
PGK	Paper-grade kraft and soda bleaching systems and lines
DGS	Dissolving-grade sulfite bleaching systems and lines
PGS	Paper-grade sulfite bleaching systems and lines



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Pulp, Paper, or Paperboard Producing Processes Attributes
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Federal Operating Permit Program

Table 1a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart S: National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry

Date:	Permit No.:	Regulated Entity No.:
Area Name:		Customer Reference No.:

Process ID No.	SOP Index No.	Process	By-Pass Line	Flow Indicator	Alternative Monitoring	Construction Date
PRO						
PRO						
PRO						
PRO						
PRO						
PRO						
PRO						
PRO						
PRO						
PRO						
PRO						



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Table 1b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart S: National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry

Date:	Permit No.:	Regulated Entity No.:
Area Name:		Customer Reference No.:

Process ID No.	SOP Index No.	Clean Condensate Alternative	Alternative ID No.	Control Device at a Kraft, Soda, or Semi-Chemical Process	Sulfite Pulping Process
PRO					
PRO					
PRO					
PRO					
PRO					
PRO					
PRO					
PRO					
PRO					
PRO					
PRO					



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Table1c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart S: National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry

Date:	Permit No.:	Regulated Entity No.:
Area Name:		Customer Reference No.:

Process ID No.	SOP Index No.	Pulping Process Condensates	Condensate Segregation Method	Condensate Control Tank	Condensate Treatment	Mixed Pond	Daily Monitoring Procedures	Alternative Continuous Monitoring System
PRO								
PRO								
PRO								
PRO								
PRO								
PRO								
PRO								
PRO								
PRO								
PRO								
PRO								



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Table 1d: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart S: National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry

Date:	Permit No.:	Regulated Entity No.:
Area Name:		Customer Reference No.:

Process ID No.	SOP Index No.	Bleaching System	Reduction of Chlorinated HAP Emissions	Monitoring Parameters	Bleaching Plant Provisions	Hypochlorite or Chlorine Bleaching	Method of Reducing Chloroform Air Emissions
PRO							
PRO							
PRO							
PRO							
PRO							
PRO							
PRO							
PRO							
PRO							
PRO							
PRO							