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

The unit attributes (OP-UA) forms are used to provide a description and data pertaining to all emission units, emission points, processes and control devices with potentially applicable requirements associated with a particular regulated entity (RN) number and application. The information will be provided in an excel format. Each OP-UA form will include sheets for General Information, a Table of Contents, OP-SUM, OP-REQ2, and the unit attribute tables. The individual unit summary (OP-SUM) information and the negative applicable/superseded requirement determinations (OP-REQ2) will be provided on each individual OP-UA form for the applicable units identified in the unit attribute tables.

General Information Sheet

The General Information sheet holds the permit information. The following permit application information is requested for the site:

Date:

Enter the date the application is being submitted by the applicant to TCEQ (MM/DD/YYYY). Any subsequent submittals must show the date of revision.

Customer Reference No. (CN):

Enter the customer reference number (CNXXXXXXX). This number is issued by TCEQ as part of the central registry process. If a customer reference number has not yet been issued, leave this space blank. Do not enter permit numbers, project numbers, account numbers, etc., in this space.

Regulated Entity No. (RN):

Enter the regulated entity reference number for the site (RNXXXXXXX). This number is issued by TCEQ as part of the central registry process. If a regulated entity reference number has not yet been issued, leave this space blank. Do not enter permit numbers, project numbers, account numbers, etc., in this space.

Permit No.:

Enter the permit number assigned by TCEQ. Leave the permit number blank if a permit number has not been assigned.

Permit Area Name:

Enter the name of the application area (maximum 50 characters). This should be the same name provided on Form OP-1 (Site Information Summary).

Permit Type:

Choose the type of permit for which this application is being submitted from the dropdown menu (SOP, GOP, TOP). Information on the different permit types can be found on TCEQ's website at: www.tceq.texas.gov/permitting/air/titlev/permit types.html.

Project Type:

Choose the project type for which this application is being submitted from the dropdown menu (Initial, Revision, Renewal).

Submission Type:

Choose the submission type for which this form is being submitted from the dropdown menu (New Application, Existing Application Update).

Project Number:

Enter the project number assigned by TCEQ. Leave the project number blank if a project number has not been assigned.

Title V Form Release Date, Form Number, APD ID Number, and Version Revised Date are present and cannot be altered.

Table of Contents Sheet

The Table of Contents lists all the sheets in the UA Form. If information is submitted on the OP-SUM, OP-REQ2 or the Unit Attribute tables, the "Data Submitted" column will display a "Yes". If no information is submitted, the "Data Submitted" column will remain blank. The Table of Contents information is auto populated. Applicants will not need to submit any information in the Table of Contents.

Instructions for OP-SUM Sheet

General:

All processes with one or more potentially applicable requirements addressed in this form must be identified on the OP-SUM sheet. The term "process" refers to a collection of units or devices that have a physical relationship, or source cap, where a regulatory requirement is potentially applicable to the process as a whole.

The purpose of this sheet is to list individual processes addressed in the Federal Operating Permit (FOP) application and to provide identifying information and preconstruction authorizations. This form is also used to designate members of groups.

The corresponding preconstruction authorization for process must also be listed on this form. For processes which were authorized to construct or modify under Permits by Rule (PBR), list all applicable PBR information, including registration numbers. If a process is authorized under more than one preconstruction authorization, then list all applicable preconstruction authorizations, including any Prevention of Significant Deterioration (PSD) and/or nonattainment permit(s).

Groups:

- A "group" is a collection of units/processes or devices that have identical applicability (or non-applicability) determinations and may, or may not, have a physical relationship.
- Group members may have different 30 TAC Chapter 116 or 30 TAC Chapter 106 preconstruction authorizations.
- Groups may be used on UA forms only if all unit attributes are identical.
- All groups must be mutually exclusive. Processes cannot be listed in more than one group on a given UA form.
- Grouping is optional.
- Groups are assigned an ID No. by the applicant, which must begin with the prefix "GRP" followed by a maximum of eleven characters (GRPXXXXXX).

Processes:

- A "process" is a quasi-unit representing a collection of units or devices that have a physical relationship and for which a regulatory requirement applies to the process as a whole.
- Individual units in a process do not need to be identified unless they have potentially applicable requirements unto themselves. Those individual units should be listed on the appropriate OP-UA form.

Specific:

Table 1

Unit Action Indicator (Unit AI):

Select "A" from the dropdown menu if the process indicated is an addition to the permit. Select "D" from the dropdown menu if the existing process indicated is being deleted from the permit. If the process is not being added/deleted from the permit, leave blank.

Revision No.:

Complete this section only for a permit revision or renewal. Enter the revision number identified on Form OP-2, Table 2. This number will link the specified change to the appropriate permit revision. If no changes are made to a process in the permit, leave blank.

Process ID No.:

Each process must be assigned an identification number. (Maximum 14 characters)

• Processes are assigned an ID No. by the applicant, which must begin with the prefix "PRO" followed by a maximum of eleven characters (PROXXXXXX).

Group ID No.:

If applicable, enter the unique identification number for the group which includes this process (GRPXXXXXX) ("GRP" followed by a maximum of 11 characters) If the process is not a member of a group, leave this column blank. (See general instructions, above, for information regarding requirements for grouping processes in FOP applications.)

Process Name/Description:

Each process must be given a name or description that distinguishes it from other processes as much as practicable. The Name/Description should clearly indicate the type of process. (Maximum 50 characters)

- Enter a text name or description for the process from STARS whenever possible.
- If no STARS name currently exists, a new name that is consistent with the existing naming convention must be provided by the applicant.

Example: The following example is intended as guidance on completion of columns on OP-SUM. It should be assumed that all criteria for inclusion in the application are met. Criteria for grouping are also assumed to be satisfied.

Process ID No.	Group ID No.	Name/Description
PRO-COAT1	GRPCOATING	Surface Coating Line 1
PRO-COAT2	GRPCOATING	Surface Coating Line 2
PRO-COAT3		Surface Coating Line 3

CAM (For reference only):

Indicate if the process is subject to 40 CFR Part 64 by selecting "Y" from the dropdown menu in the "CAM" column next to the process. Please refer to 40 CFR Part 64 to determine applicability. *Certification by the Responsible Official (RO) pursuant to 30 TAC § 122.165 does not extend to the information which is designated on forms as "For reference only."*

Preconstruction Authorizations (PCA):

At least one PCA must be indicated for each process; however, a process may have multiple authorizations. *All preconstruction authorizations listed on this form must also be identified on Form OP-REQ1.* When a process has multiple authorizations, each PCA must be listed in a separate row.

The following examples are intended as guidance on completion of columns for the preconstruction authorizations. The examples are followed by specific instructions for each column.

Example 1: Adding multiple PCA Categories

Unit AI	Revision No.	Unit ID No.	Group ID No.	Unit Name/Description	CA M	PCA AI	Preconstruction Authorization (PCA) Category		Permit By Rule (PBR) Number	PBR Effective Date
А		Flare1		Diamine Flare	Y	А	NSR Permit	1234		
А		Flare1		Diamine Flare	Y	A	PSD	PSDTX1234		
А		Flare1		Diamine Flare	Y	А	PBR	23456, 34567	106.261	11/01/2003
А		Flare1		Diamine Flare	Y	A	PBR	23456, 34567	106.262	11/01/2003

Example 2: Adding and deleting a PCA

Unit AI	Revision No.	Unit ID No.	Group ID No.	Unit Name/Description	CAM	PCA AI	Preconstruction Authorization (PCA) Category	Authorization/ Registration Number	Permit By Rule (PBR) Number	PBR Effective Date
		T-3	GRPTANKS	Tank 3		А	Standard Permit	12345		
		T-3	GRPTANKS	Tank 3		D	PBR		106.432	09/04/2000

Preconstruction Authorization Action Indicator (PCA AI):

Select "A" from the dropdown menu if a preconstruction authorization is being added for the process. Select "D" from the dropdown menu if a preconstruction authorization is being deleted from the process. If a preconstruction authorization is not being added/deleted from the process, leave blank.

Preconstruction Authorization (PCA) Category:

Select from the dropdown menu the category of the PCA being added or deleted.

- PBR Permit by Rule claimed or registered under 30 TAC Chapter 106
- Standard Permit 30 TAC Chapter 116 and non-rule Air Quality Standard Permits
- NSR Permit 30 TAC Chapter 116 preconstruction authorizations
- PSD Prevention of Significant Deterioration Permits
- Nonattainment Nonattainment Permits
- GHG Greenhouse Gas Permits
- 112(G) [HAP] Hazardous Air Pollutant Permits
- MSW or IHW Municipal Solid Waste or Industrial Hazardous Waste Permits
- Exemption De Minimis Facilities or Sources authorized by 30 TAC Chapter 116, § 116.119

Authorization/Registration Number:

List all TCEQ permit numbers for 30 TAC Chapter 116 preconstruction authorizations, Title I preconstruction authorizations (PSD and nonattainment permits) and 30 TAC Chapter 106 (PBR) registration numbers, under which the process is operating.

- **30 TAC Chapter 116 Permits:** Enter the TCEQ permit number, for example, 12345. This includes special permits and standard permit registrations.
- **Prevention of Significant Deterioration (PSD) Permit:** Enter the PSD permit number (PSDTXXXX), for example, PSDTX123. If the PSD permit has been modified, include the "M" suffix (PSDTXXXXMXX), for example, PSDTX123M5. *Title I authorizations should only be listed for processes addressed by the PSD or nonattainment permits*.
- Nonattainment Permit: Enter each nonattainment permit number (NXXX), for example, N123. If the nonattainment permit has been modified, include the "M" suffix (NXXXMXX), for example, N123M5. *Title I authorizations should only be listed for processes addressed by the PSD or nonattainment permits.*
- **Permit by Rule (previously Standard Exemption):** Enter the PBR Registration No. for each PBR registered under 30 TAC Chapter 106 and each standard exemption previously registered under 30 TAC Chapter 116.
- **Exemption:** Enter 116.119 for a de minimis facility or source, which has other potentially applicable or applicable requirements (these are authorized by 30 TAC Chapter 116, § 116.119). *De minimis facilities or sources should not be included if there are no other potentially applicable or applicable requirements.*

Permit by Rule (PBR) Number:

For each PBR claimed or registered under 30 TAC Chapter 106, and each standard exemption claimed or registered previously under 30 TAC Chapter 116, enter the number in the appropriate format shown below.

<i>Note: All processes</i>	authorized by PBR must	t also be identified on I	Form OP-PBRSUP.
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Format	PBR/standard exemption claimed or registered date
106.XXX	Authorized on or after March 14, 1997 (except 106.181 is on or after December 27, 1996)
XXX	Authorized prior to March 14, 1997

XXX = 30 TAC Chapter 116 standard exemption number or 30 TAC Chapter 106 PBR number.

PBR Effective Date:

For each PBR claimed or registered under 30 TAC Chapter 106 and each standard exemption claimed or registered, enter the effective date of the rule. *MM/DD/YYYY = Effective date of the Standard Exemption or PBR in effect at the time claimed or granted. Information on version dates is available at:*

Information on Chapter 116 version dates is available at: <u>www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html</u>. Information on Chapter 106 version dates is available at: <u>www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html</u>.

Please note that prior to March 14, 1997, a standard exemption list was incorporated by reference into 30 TAC Chapter 116 and each standard exemption had an assigned number, e.g., 112. Each standard exemption now resides in a section of 30 TAC Chapter 106 (e.g., 30 TAC § 106.148) and now is referred to as a PBR.

(Standard exemptions were readopted under the PBR designation on March 14, 1997.) Information regarding PBRs may be found on the TCEQ website at <u>https://www.tceq.texas.gov/permitting/air/permitbyrule/air-pbr</u>.

The applicant has the option of claiming a newer and more stringent version of the standard exemption or PBR if the original applicable version of the standard exemption or PBR cannot easily be determined. As an example of a standard exemption authorized before March 14, 1997, Standard Exemption No. 6 had an effective date of August 30, 1988. It was then amended with a new effective date of July 20, 1992. The standard exemption identifier for a compressor engine constructed in 1993 and registered under Standard Exemption No. 6 would be represented as:

Permit By Rule (PBR) Number	PBR Effective Date	
6	07/20/1992	

As an example of a PBR authorized on or after March 14, 1997, Standard Exemption No. 6 had an effective date of June 7, 1996. It was then amended and moved to 30 TAC § 106.512 with an effective date of March 14, 1997. The PBR identifier for a compressor engine constructed in 1998 and registered under 30 TAC § 106.512 would be represented as:

Permit By Rule (PBR) Number	PBR Effective Date	
106.512	03/14/1997	

Instructions for OP-REQ2 Sheet

General:

The purpose of this sheet is to document negative applicability from potentially applicable requirements or to document duplicative, redundant, and or contradicting requirements that have been superseded by a more stringent or equivalent requirement for processes when a permit shield is requested. Negative applicability or superseded requirement determinations when a permit shield is NOT requested may be documented on this sheet OR the appropriate unit attribute table.

A negative applicability determination is any regulatory citation that provides the basis whereby every operating condition of a process is not subject to a regulation. For example, Title 40 Code of Federal Regulation § 60.110b(a) [40 CFR § 60.110b(a)] could be the regulatory basis for a negative applicability determination for a VOC storage tank of less than 75 cubic meters; therefore, the storage tank is completely exempt from 40 CFR Part 60, Subpart Kb.

Note: Numerous regulatory citations appear to authorize exemptions to qualifying processes from those regulations. However, closer examination typically reveals that there are still some requirements which must still be met (such as monitoring and/or recordkeeping).

For certain processes subject to certain 40 CFR Part 63 standards, other federal regulations may apply. In many instances one of the overlapping regulations may specify which rule supersedes the other. The regulation may state that the owner or operator only has to comply with a specific subpart after the compliance date or it may state that compliance with the subpart is deemed to be in or constitute compliance with other subparts. Although superseded rules do not qualify as negative applicability determinations, it has been determined that these instances can be documented on the OP-REQ2, if the applicant elects to comply only with the superseding requirement. For example, a surface coating process subject to 40 CFR Part 63, Subpart IIII, may not be required to comply with 40 CFR Part 63, Subpart PPPP due to rule overlap of 40 CFR Part 63, Subpart IIII. In this case, the permit applicant may request a permit shield from 40 CFR Part 63, Subpart PPPP. In this case, the applicant must submit the superseding requirement citation §63.4481(d), and a textual description of the superseding determination, if they elect to comply with only the superseding requirement.

When a process has one or more potential applicable requirements, the applicant must list all the requirements for which negative applicability or superseded requirement determinations can be made. Once the negative applicability or superseded requirement determinations have been made, indicate the citation and reason for the non-applicability or superseded requirement in the appropriate columns. Indicate the determinations for all potentially applicable requirements for each process before listing the next process.

Negative applicability or superseded requirement determinations for potentially applicable requirements, confirmed by TCEQ, may be approved as a permit shield (see instructions outlined in Area Wide Applicability Determinations, Form OP-REQ1, to request a permit shield). If a permit shield is requested, the determinations are always required on the OP-REQ2 sheet. For additional information relating to permit shields, refer to the TCEQ guidance document entitled "Site Operating Permit (SOP) Permit Shield Guidance found on TCEQ's website at: www.tceq.texas.gov/permitting/air/guidance/titlev/tv_site_guidance.html.

Specific:

Fill out the OP-REQ2 sheet to provide a negative applicability determination for processes included on this OP-UA form. If the process is not submitted on an OP-UA form, submit the negative applicability determination on the standalone OP-REQ2 form.

Unit Action Indicator (AI):

Complete this section only for a permit revision or renewal. Select "A" from the dropdown menu if the negative applicability or superseded requirement is an addition to the permit. Select "D" from the dropdown menu if the negative applicability or superseded requirement is being deleted from the permit. For revisions to existing negative applicability or superseded requirements in the permit, use the "D" indicator for the existing permit shield and the "A" indicator for the revised permit shield.

Revision No.:

Complete this section only for a permit revision or renewal. Enter the revision number identified on Form OP-2, Table 2 (only for revision items within the application). This number will link the specific negative applicable requirement determination to the appropriate revision.

Process ID No.:

Select the identification number (ID No.) (maximum 14 characters) of the process as listed on the OP-SUM sheet.

Potentially Applicable Regulatory Name:

Select the name of the potentially applicable requirement from the dropdown menu for which negative applicability or superseded requirement is being demonstrated. If the potentially applicable regulatory name is not found in the dropdown menu, enter it manually (maximum 50 characters).

Note: Permit shields cannot be granted for permit authorizations of any kind (i.e. - PSD, NSR permit, Acid Rain, etc.).

Negative Applicability or Superseded Requirement Citation:

Enter the citation of the paragraph of the rule that was used to determine negative applicability or superseded requirements. Provide the citation detail to the level of the paragraph allowing the exemption, exclusion, or non-applicability. If there is more than one citation for determining negative applicability or superseded requirements, select the most appropriate or the clearest (least likely to be misinterpreted). Negative applicability or superseded requirement determinations by the applicant are subject to auditing during the permit application review. The applicant must always indicate the negative applicability or superseded requirement citation on the OP-REQ2. For examples on the level of detail for citations, see table below (maximum 36 characters).

Regulation	Potentially Applicable Regulatory Name (Input Format)	Negative Applicability or Superseded Requirement Citation (Input Format)
30 TAC Chapters 111, 112, 113, 115 and 117	Chapter 111	§ 111.XXX(x)(yy)(zz)
	Chapter 112	§ 112.XXX(x)(yy)(zz)
	Chapter 113	§ 113.XXX(x)(yy)(zz)
	Chapter 115, Storage of VOCs	§ 115.XXX(x)(yy)(zz)
	Chapter 117, ICI	§ 117.XXX(x)(yy)(zz)
40 CFR Part 60, Subparts, New Source Performance Standards (NSPS)	NSPS XXX	§ 60.XXX(x)(yy)(zz)
40 CFR Part 61, Subparts, National Emission Standards for Hazardous Air Pollutants (NESHAP)	NESHAP XX	61.XX(x)(yy)(zz)
40 CFR Part 63, Subparts, NESHAP by source category, including hazardous organic (HON)	MACT XX	§ 63.XXX(x)(yy)(zz)

Example Applicable Regulatory Requirements*

* This list is not intended to be exhaustive

Negative Applicability/Superseded Requirement Reason:

Enter a textual description indicating the reason for the negative applicability or superseded requirement determination. If a permit shield is requested, the textual description provided will be recreated as the *Basis of Determination* for the permit shield in the permit. The description may include rule text, rule preamble, or other text resulting from a historical rule interpretation, EPA applicability determination Index (ADI), or case law. Use multiple lines if necessary (maximum 250 characters).

OP-UA20 Form Unit Attribute Tables- Instructions

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:

<u>**Tables 1a - 1d:</u>** 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</u>

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.texas.gov/permitting/central registry/guidance.html.

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 14 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 go to the TCEQ website at www.tceq.texas.gov/permitting/air/guidance/titlev/tv_fop_guidance.html.

PROCESS:

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

Code	Description
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

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.

Code	Description
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 14 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 go to the TCEQ website at www.tceq.texas.gov/permitting/air/guidance/titlev/tv_fop_guidance.html.

* 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 14 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.

Code	Description
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
ТНОХ	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.

Code	Description
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 14 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 go to the TCEQ website at www.tceq.texas.gov/permitting/air/guidance/titlev/tv_fop_guidance.html.

PULPING PROCESS CONDENSATES:

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

Code	Description
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.

Code	Description
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.

Code	Description
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 14 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 go to the TCEQ website at www.tceq.texas.gov/permitting/air/guidance/titlev/tv_fop_guidance.html.

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.

Code	Description
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.

Code	Description
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.

Code	Description
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.

Code	Description
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