EPA United States Environmental Protection Agency

Region 6 Compliance Assurance and Enforcement Division

INSPECTION REPORT

Inspection Date(s):	09/10/2018 – 09/13/2018	
Media:	Air	
Regulatory Program(s)	NSPS, NESHAP	
Company Name:	**International Paper Company**	
Facility Name:	**Bogalusa Mill**	
Facility Physical Location:	401 Avenue U	
(city, state, zip code)	Bogalusa, Louisiana 70427	
Mailing address:	401 Avenue U	
(city, state, zip code)	Bogalusa, Louisiana 70427	
County/Parish:	Washington Parish	
Facility Contact:	Laura Connor	EHS Manager
	laura.connor@ipaper.com	
FRS Number:	110033671284	
Identification/Permit Number:	AI: 38936; Title V: 3060-00001-9AA	
Media Number:	AFS: 22-117-00001	
Primary NAICS:	322130	
Primary SIC:	2631	

Personnel participating in inspection:

James Haynes	EPA/6EN-AT	Physical Scientist	214-665-8546
James Leathers	EPA/6EN/AT	Environmental Engineer	214-665-6569
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Davina Witte	LDEQ	Environmental Scientist	504-736-7730
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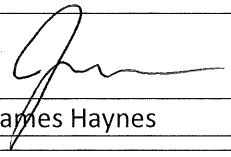
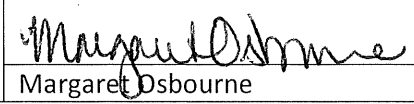
Bernard Chascin	IP Bogalusa Mill	Mill Manager	985-732-8500
Laura Connor	IP Bogalusa Mill	EHS Manager	985-732-8764
Alban Bush	IP Bogalusa Mill	Environmental Manager	985-516-3075
Clint Casanova	IP Bogalusa Mill	Environmental Engineer	985-732-8697

EPA Lead Inspector Signature/Date		10/23/18
	James Haynes	Date
Supervisor Signature/Date		10/23/18
	Margaret Osbourne	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

Three Unites States Environmental Protection Agency ("U.S. EPA") Region 6 Air Enforcement inspectors ("the inspection team") arrived at International Paper Company's Bogalusa Mill ("IP Bogalusa Mill") at approximately 11:00 hours on September 10, 2018 for an announced inspection. The inspection team was led by Mr. James Haynes, Physical Scientist, and included Mr. James Leathers, Environmental Engineer, and Dr. Sarah Frey, Physical Scientist. I, James Haynes, conducted an opening conference with the IP Bogalusa Leadership Team that included Mr. Bernard Chascin, Mill Manager, Ms. Laura Connor, EHS Manager, Mr. Alban Bush, Environmental Manager, and Mr. Clint Casanova, Environmental Engineer. Also, Ms. Davina Witte, Ms. Susan Rahey, and Mr. Tyler Williams, Environmental Scientists with the Louisiana Department of Environmental Quality (LDEQ), ("LDEQ inspectors") participated in the inspection. I presented my credentials to Mr. Chascin and informed him that this was a U.S. EPA inspection to determine compliance with the facility's Title V Air Permit and the Clean Air Act ("CAA") New Source Performance Standards ("NSPS") and National Emission Standards for Hazardous Air Pollutants ("NESHAP"). The scope of the inspection was a partial compliance evaluation ("PCE"). Photographs taken during the inspection can be found in **Appendix 1**. The Sign-In sheet for the inspection's opening conference is attached as **Appendix 2**.

FACILITY DESCRIPTION

The IP Bogalusa Mill is a kraft pulp and paper mill in Washington Parish, Louisiana and produces linerboard. The mill currently operates under Permit No. 3060-00001-9AA, issued June 19, 2018. The permit is due to expire April 25, 2019. Primary operations at the mill include multiple fuel-fired boilers (power operations), wood pulping operations, chemical recovery operations, papermaking operations, maintenance, and additional operations and equipment necessary to support these activities. Power operations include two steam boilers and associated processes and equipment. The steam is used for the mill's production processes and directed to turbines for the generation of electricity. Wood pulping operations include two continuous digesters where wood chips are converted into pulp. Chemical recovery operations include evaporators, two recovery furnaces, and associated tanks and concentrators. Additional processes and equipment are necessary to support the chemical recovery operations. The papermaking operations include two Fourdrinier machines that create linerboard. Other operations include, but are not limited to, the woodyard, tall oil operations, causticizing and lime recovery operations, and wastewater treatment.

Section II - OBSERVATIONS

On Monday, September 10, 2018, the inspection team, IP Bogalusa Mill staff, and LDEQ inspectors participated in a driving tour of the aeration stabilization basins of the wastewater treatment system and the different process areas of the mill operations following a brief safety orientation. After the driving tour, we reviewed process flow diagrams and other records while discussing the processes at the

plant with Mr. Casanova. The records reviewed on-site, such as the process flow diagrams, were provided to the inspection team in response to a Document Request submitted to Ms. Connor approximately one week prior to the inspection on September 4, 2018. This Document Request is included as **Appendix 3**. The inspection team departed the IP Bogalusa Mill at approximately 17:00 hours.

On Tuesday, September 11, 2018, the inspection team arrived on-site at approximately 07:15 hours and continued to review documents provided in response to the referenced Document Request. Once LDEQ inspectors arrived, we prepared for a tour of the power plant operations, specifically Power Boiler 12. The tour of Power Boiler 12 was led by Ms. Michelle Murray, Area Process Manager (Power), and Mr. Casanova served as our escort. At this operational area, we observed the monitoring equipment near the exit of the stack, the location of the continuous emissions monitoring system ("CEMS") with associated analyzers and calibration gases, and the control room for the operating area (Photo Nos. 1 and 2). Within the control room, we viewed the cameras of several belts feeding Power Boiler 12. Ms. Murray noted that maintenance was being performed on the main bark belt, and the boiler was operating on natural gas; however, the operator controlling the distributed control system ("DCS") confirmed that small amounts of bark were still being fed into the boiler through a screw feed. After the control room we observed the cinder handling area which washes cinders and returns them to the bark belt as seen in Photo Nos. 3 and 4. Upon completing the tour of this area, we requested two documents shown to us by Ms. Murray indicating locations of equipment and a temperature gradient of the flue gas through the boiler.

The inspection team, LDEQ inspectors, and IP Bogalusa Mill staff then began a tour of the pulping operations. We were escorted by Mr. Casanova and the tour was led by Mr. Robert Hambleton, Area Manufacturing Excellence Leader (Pulp). We began by walking past the K1 digester and its impregnation vessel ("IV"). At the bottom of the K1 IV, we observed a leak comprised of what appeared to be both black liquor and white liquor. See Photo Nos. 5 and 9. Mr. Hambleton explained that the leak was discovered upon restarting the plant after the 2018 annual outage. He indicated that this leak would be addressed for permanent repair at the next annual outage. Until that time, an attempt at a temporary repair was scheduled within the next day. We then observed the contaminated warm water tank and discussed the piping entering and exiting the tank as well as the open "gooseneck" vent on the roof visible in Photo No. 6. We returned to the K1 IV leak location after noticing additional black liquor leaking to the concrete opposite of the IV as seen in Photo No. 7. Mr. Hambleton explained that the leak was coming from the head of the blow line refiner of the K4 digester which was recently worked on during the annual outage. The refiner receives the pulp slurry after the digester to reduce wood to a fibrous mass through mechanical processes, and the unit operates at high pressures to move the slurry to the K4 blow tank. Next, we observed the chip bin and other necessary control equipment since the chip bin receives flash steam from the digester. This flashed steam is part of the low volume, high concentration ("LVHC") system and is required to be controlled. In addition to the chip bin and gas collection system, we viewed the coolers that condense liquids from the gas collection system and multiple locations where the control devices can be bypassed, *i.e.* vent to atmosphere (Photo No. 8). Another part of the gas collection system are pressure relief devices that can allow the gases collected

to vent to atmosphere if working pressures rise above an unsafe level. An example of a device we viewed is a rupture disk, and Mr. Hambleton explained that the IP Bogalusa Mill records two parameters (temperature and pressure) on either side of the rupture disk as a redundancy (Photo No. 11). From the chip bins, we observed the K1 digester and K1 atmospheric diffusion washer from a distance. No visible emissions were observed. We continued to the control room for this process area and were shown where operators control the processes through the DCS. Mr. Hambleton also showed us how the bypass systems are monitored and controlled through the DCS before breaking for lunch.

After a lunch break, we returned to the pulping operations area to view the steaming vessel of the K1 digester and the additional equipment needed for the process such as the low-pressure and high-pressure feeders. We also observed the washers of the K4 digester and tags notating leak detection and repair ("LDAR") components near the washers (Photo Nos. 12 through 14). These are enclosed, drum washers that typically run in series prior to high density storage. The washer for the K1 digester is an atmospheric diffusion washer located separate from the building that housed the K1 and K4 digester. We observed one minor leak of black liquor on the ground floor of the building at a trim backflush pump that is infrequently used; however, due to repairs at another pump, the spare was brought into service. Mr. Hambleton stated that once the repairs were done at the other pump, the trim pump would be taken out of service and the leak at the pump flange would stop and be repaired. Following a brief rain delay, we returned to the office to prepare for a debrief with mill management. The inspection team departed the IP Bogalusa Mill at approximately 17:00 hours.

On Wednesday, September 12, 2018, the inspection team arrived on-site at approximately 07:30 hours and continued to review documents provided in response to the referenced Document Request. Once LDEQ inspectors arrived, we prepared for a tour of the chemical recovery operations. The tour of the chemical recovery operations was led by Mr. David Villarrubia, Capital Projects Engineer, and Mr. Casanova was our escort. We began the tour by walking to the eight-effect evaporator system (Photo No. 17). We discussed several pieces of equipment, such as the evaporator hotwell and nearby coolers, before climbing to the level of the evaporators. We walked past each evaporator and followed the piping for the LVHC gases generated at the evaporators at an attempt to see where the LVHC line ties into the existing piping; however, we were unable to obtain a good vantage point to view that location. After viewing the evaporators, we walked to the recovery boiler process area. We viewed the black liquor oxidation tanks associated to Recovery Boiler No. 20 and the concentrator for Recovery Boiler No. 21 (Photo No. 18). We then entered the building for Recovery Boiler No. 21, and we viewed the location where concentrated black liquor is fed into the recovery boiler, the location high volume, low concentration ("HVLC") and LVHC gases - sometimes referenced together as non-condensable gases, or NCGs - are fed into the recovery boiler, and the location where smelt leaves the recovery boiler and enters the smelt dissolving tank (Photo Nos. 20 through 22). We were also able to review the electrostatic precipitator ("ESP") for the Recovery Boiler No. 21 and looked at the continuous opacity monitoring system ("COMS") at the stack. Following the walkthrough of Recovery Boiler No. 21, we entered the control room to look at the controls available to the operators and to see where conditions of the evaporators and other equipment is monitored. While we were in the control room, we observed IP Bogalusa Mill remove the feed of concentrated black liquor that was being sent to Recovery Boiler No.

20 and to switch to natural gas as the primary fuel of the recovery boiler. After the control room of the chemical recovery operations, we toured the Recovery Boiler No. 20 building and viewed the location were black liquor is concentrated prior to being fed into the boiler. The Recovery Boiler No. 20 is categorized as a direct contact evaporator recovery boiler, and the black liquor is concentrated a final time by the hot flue gas of the boiler. At this boiler, we viewed the black liquor being sprayed down one of two evaporators while the hot flue gases travel upwards and are rejoined before entry into the boilers ESP (Photo No. 23). We also viewed the location where HVLC gases are routed during times the Recovery Boiler No. 21 is unable to receive waste gases. Following the tour of Recovery Boiler No. 20, we returned to the building of Recovery Boiler No. 21, walked by the smelt dissolving tank, and entered the CEMS shack to view the associated analyzers and calibration gases. After the tour, we returned to the office and began our lunch break.

We returned from lunch and continued to review documents and discuss parts of the Document Request with IP Bogalusa Mill technical staff, such as the site-specific LDAR monitoring plan. Following the discussion, we stated that we would like to view a portion of Power Boiler 10C - specifically, the belt carrying bark and cinders. We were unable to obtain an adequate vantage point of the area of interest, and we left the area of Power Boiler 10C. We then began walking in the direction of the lime kiln; however, we stopped en route near the evaporator hotwell to compare the site-specific, LDAR monitoring plan with the components in service (Photo No. 24). Additionally, we began searching for LDAR tags to identify components identified on the plan. We observed groups of tags that were attached to the hand rails, and it was explained to us by multiple IP Bogalusa Mill staff that this was done to simplify the monthly inspections. The idea is that an observer can stand at a specific location and confirm the group of tags, and they will be at a vantage point to observe the components and identify visible evidence of defects in ductwork, piping, enclosures, and connections. After viewing some diagrams and equipment, we continued to the lime kiln operations and turpentine tank. At the lime kiln, the tour was led by Mr. Mark Bryan, Area Process Manager (Caustic). Mr. Bryan gave us a detailed process summary in the control room before viewing the DCS and observing the lime kiln burners. At the time we were at the lime kiln, Mr. Bryan stated that the lime kiln was in service as the backup control device for the LVHC gases that are normally routed to Recovery Boiler No. 21. While we were near the burner, Mr. Bryan pointed out the piping where LVHC gases are introduced into the lime kiln (Photo No. 25). During that time, Mr. Casanova and Dr. Frey were looking at additional LDAR diagrams and tags to confirm components identified in the plan and locations of the components. Following the lime kiln, we viewed the lime kiln condensate tank and continued to the turpentine tank (Photo No. 26). From the turpentine tank, we ended the tour for the day and returned to the office. We conducted a debrief with mill management and departed the IP Bogalusa Mill at approximately 17:15 hours.

On Thursday, September 13, 2018, the inspection team arrived on-site at approximately 07:45 hours and reviewed documents provided in response to the referenced Document Request. Once LDEQ inspectors arrived, we continued discussions regarding the Document Request. Dr. Frey and Ms. Witte met with Mr. Casanova regarding the site-specific, LDAR monitoring plan to discuss discrepancies within the plan. Additionally, I reviewed the 2016 emission inventory to compare reported emissions to permit limits established by the state-issued permit. Following additional discussions among the inspection

team and LDEQ inspectors, we departed the facility for lunch, and we returned to prepare for a closing conference with IP Bogalusa Mill staff.

Section III – AREAS OF CONCERN

Areas of Concern 1 through 5 were relayed to the facility during the closing conference conducted at approximately 13:45 on Thursday, September 13, 2018. The Sign-In sheet for the inspection's closing conference is included as **Appendix 4**. Additionally, a copy of all photographs taken were provided to the facility, and no claims of confidential business information ("CBI") were made regarding the photos or documents provided.

1) Regulatory Applicability: The IP Bogalusa Mill has a new tank that may be subject to additional requirements. For example, the IP Bogalusa Mill constructed a spill collection tank in 2013 that is designed to store weak black liquor spills. This project was designed to limit the loading of black liquor to the wastewater treatment system. While this is not currently permitted as a "weak liquor storage tank" as defined by Title 40 of the Code of Federal Regulations (40 C.F.R.), Part 63, Subpart S, it serves a similar function to a weak liquor storage tank. According to 40 C.F.R. § 63.443(a)(2)(iv), total hazardous air pollutant emissions from new source, weak liquor storage tanks shall be controlled.

2) Leak Detection and Repair: The IP Bogalusa Mill has numerous inconsistencies between the site-specific LDAR monitoring plan and actual components that were discovered during the on-site inspection. Additionally, a missing car seal was also noted during the on-site inspection at LDAR Tag No. MV-11014E.

3) Contaminated Warm Water Tank and Controls: The IP Bogalusa Mill operates a contaminated warm water tank that operates as part of the condensate collection system; therefore, the requirements of 40 C.F.R. § 63.446(d)(2) may be applicable. Those requirements state that all openings on a condensate tank shall be maintained in a closed, sealed position. In addition, those requirements state that all openings must be free of detectable leaks as indicated by an instrument reading of less than 500 parts per million above background. The "gooseneck" vent not included in the site-specific LDAR plan, and no negative pressure tests have been performed.

4) Emission Inventory: The IP Bogalusa Mill may not have accurately reported emissions to the state of Louisiana for their emission inventory in the latest year available to U.S. EPA at the time of the inspection. For example, the IP Bogalusa Mill operates three high density storage tanks; however, the reported emissions for all three storage tanks appear to be reported under one unique release point. Also, emissions reported for the primary black liquor oxidation tank are not listed as having any permit limits within the state-issued permit.

5) Notification of Compliance Status ("NOCS"): The IP Bogalusa Mill is required to submit a NOCS for each of the MACT rules it is subject to in accordance with 40 C.F.R. § 63.9(h). When there is an applicable change to the NOCS already submitted to the Administrator, 40 C.F.R. § 63.9(j) requires that

change be provided to the Administrator within 15 days. The IP Bogalusa Mill has inconsistencies within the NOCS; however, no updated submissions have been identified.

Additional Areas of Concern, noted below, have been identified following the on-site portion of the inspection:

6) Emissions Standards: The IP Bogalusa Mill has reported exceedances for opacity, total reduced sulfur, and nitrogen oxides within their NSPS reports at the recovery boiler and power boilers.

7) Alternative Monitoring Plan ("AMP"): The IP Bogalusa Mill submitted two AMPs with the latest permit application that are intended to cover specific monitoring requirements at the power boilers and LDAR components. For the boilers, only Power Boiler 12 is referenced in the approved AMP; therefore, the AMP may not be applicable to Power Boiler 10C. For the LDAR components, the IP Bogalusa Mill is using an AMP that was approved for other International Paper facilities and may not apply to the IP Bogalusa Mill.

8) Quality Assurance/Quality Control ("QA/QC"): The IP Bogalusa Mill is required to maintain the CEMS unit at Recovery Boiler No. 21 in accordance with 40 C.F.R. Part 60, Appendix F. During an initial review, it appears that a cylinder gas audit may have been conducted closer than two months from the last audit, and the IP Bogalusa Mill may not be meeting the requirements of Appendix F, Procedure 1.

Section IV – FOLLOW UP

Additional information has been received by the U.S. EPA after exiting the Facility on September 13, 2018. The U.S. EPA received drawings related to the contaminated warm water tank and emission records at the recovery boilers and power boilers. The U.S. EPA will continue to work with IP Bogalusa Mill on addressing and evaluating the Areas of Concern identified in Section III as we continue the investigation.

Section V – LIST OF APPENDICES

Appendix 1 – Photograph Log
Appendix 2 – Opening Conference Sign-in Sheet
Appendix 3 – Document Request
Appendix 4 – Closing Conference Sign-in Sheet
Appendix 5 – Permit No. 3060-00001-V9AA, Selected Pages (Regulatory Applicability)

Appendix 1

Photograph Log

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0262-00.JPG
Date of Photo:	09/11/2018
Time of Photo:	09:12
Photographer:	James Haynes
Description:	Distant view of Power Boiler 12

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0263-00.JPG
Date of Photo:	09/11/2018
Time of Photo:	09:22
Photographer:	James Haynes
Description:	Sampling at stack of Power Boiler 12

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0264-00.JPG
Date of Photo:	09/11/2018
Time of Photo:	10:00
Photographer:	James Haynes
Description:	Shaker to handle cinders

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0265-00.JPG
Date of Photo:	09/11/2018
Time of Photo:	10:02
Photographer:	James Haynes
Description:	Distant view of cinder system; Cinders return to belt feeding into power boilers

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0266-00.JPG
Date of Photo:	09/11/2018
Time of Photo:	10:51
Photographer:	James Haynes
Description:	Leak at bottom of K1 impregnation vessel

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0267-00.JPG
Date of Photo:	09/11/2018
Time of Photo:	10:58
Photographer:	James Haynes
Description:	Tank identification for Contaminated Warm Water Tank – also labeled Foul Condensates

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0268-00.JPG
Date of Photo:	09/11/2018
Time of Photo:	11:08
Photographer:	James Haynes
Description:	Weak black liquor leak at head of blow line at K4 refiner

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0269-00.JPG
Date of Photo:	09/11/2018
Time of Photo:	11:30
Photographer:	James Haynes
Description:	Bypass of control device allowing LVHC gases to vent to atmosphere

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0270-00.JPG
Date of Photo:	09/11/2018
Time of Photo:	11:39
Photographer:	James Haynes
Description:	Top of Contaminated Warm Water Tank at center showing “gooseneck” vent

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0271-00.JPG
Date of Photo:	09/11/2018
Time of Photo:	11:45
Photographer:	James Haynes
Description:	Standpipe in foreground; Evaporators and recovery boiler buildings in background

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0272-00.JPG
Date of Photo:	09/11/2018
Time of Photo:	12:03
Photographer:	James Haynes
Description:	Monitoring for temperature and pressure at rupture disk

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0273-00.JPG
Date of Photo:	09/11/2018
Time of Photo:	14:35
Photographer:	James Haynes
Description:	Grouped LDAR tags in building near drum washers

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0274-00.JPG
Date of Photo:	09/11/2018
Time of Photo:	14:39
Photographer:	James Haynes
Description:	Additional LDAR tags attached to railing in building near drum washers

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0275-00.JPG
Date of Photo:	09/11/2018
Time of Photo:	14:41
Photographer:	James Haynes
Description:	Grouped LDAR tags attached to line in foreground; Previously monitored components in background of tags (no longer in LDAR plan)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0276-00.JPG
Date of Photo:	09/12/2018
Time of Photo:	09:22
Photographer:	James Haynes
Description:	White water tank overflowing

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0277-00.JPG
Date of Photo:	09/12/2018
Time of Photo:	09:26
Photographer:	James Haynes
Description:	Ground-level view of standpipe and additional vent lines

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0278-00.JPG
Date of Photo:	09/12/2018
Time of Photo:	09:43
Photographer:	James Haynes
Description:	Ground-level view of eight-effect evaporators

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0279-00.JPG
Date of Photo:	09/12/2018
Time of Photo:	10:23
Photographer:	James Haynes
Description:	View of boilout tank and black liquor oxidation tanks near Recovery Boiler No. 20

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0280-00.JPG
Date of Photo:	09/12/2018
Time of Photo:	10:27
Photographer:	James Haynes
Description:	LVHC condensate tank near recovery boilers with different color for LDAR tags

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0281-00.JPG
Date of Photo:	09/12/2018
Time of Photo:	10:41
Photographer:	James Haynes
Description:	Smelt exiting at bottom of Recovery Boiler No. 21

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0282-00.JPG
Date of Photo:	09/12/2018
Time of Photo:	10:43
Photographer:	James Haynes
Description:	Black liquor being sprayed into Recovery Boiler No. 21

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

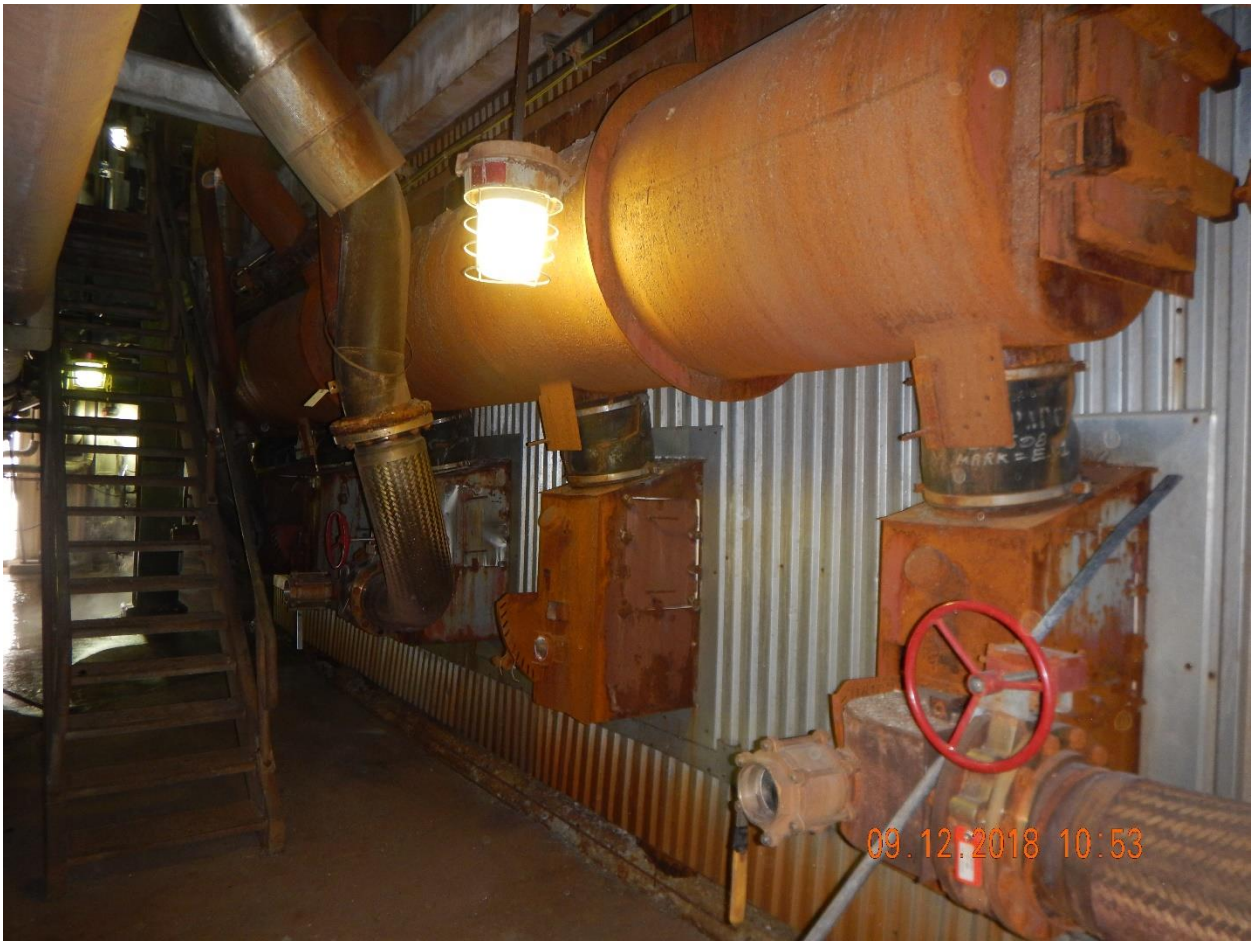


Photo File Name:	DSCN0283-00.JPG
Date of Photo:	09/12/2018
Time of Photo:	10:53
Photographer:	James Haynes
Description:	NCGs being fed into Recovery Boiler No. 21

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0284-00.JPG
Date of Photo:	09/12/2018
Time of Photo:	11:30
Photographer:	James Haynes
Description:	Black liquor is sprayed down the DCE of Recovery Boiler No. 20

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0285-00.JPG
Date of Photo:	09/12/2018
Time of Photo:	15:16
Photographer:	James Haynes
Description:	Evaporator Hotwell near the eighth effect evaporator at ground-level; LDAR tags visible

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0286-00.JPG
Date of Photo:	09/12/2018
Time of Photo:	15:48
Photographer:	James Haynes
Description:	Natural gas burner at lime kiln; LVHC can be directed to lime kiln and enter above and to left of natural gas burner

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 26

Location: International Paper Company, Bogalusa Mill		
City: Bogalusa	County/Parish: Washington	State: LA

Photo File Name:	DSCN0287-00.JPG
Date of Photo:	09/12/2018
Time of Photo:	16:12
Photographer:	James Haynes
Description:	Turpentine storage tank

Appendix 2

Opening Conference Sign-in Sheet

opening

Meeting with: International Paper Company - Bogalusa Mill

Purpose of meeting: Inspection

Date: 9/10/18

	Name	Title	Representing	E-mail	Phone
1	James Haynes	Physical Scientist	EPA R6	haynes.james@epa.gov	(214)665-8546
2	James Leathers	Environmental Engineer	EPA R6	Leathers.james@epa.gov	214 665-6569
3	Sarah Frey	Env. Scientist	EPA R6	Frey.sarah@epa.gov	214-665-6499
4	Davina Witte	Env. Scientist	LDEQ	davina.witte@la.gov	504 736-7730
5	Susan Rahey	Env. Scientist	LDEQ	susan.rahey@la.gov	(504) 736-7747
6	Tyler Williams	Env. Scientist	LDEQ	tyler.williams@la.gov	(504) 736-7729
7	Rich Strelow	Paper Bus. Unit Ldr.	IP	Richard.Strelow@ipaper.com	(803) 318-4762
8	Richard Green	MILL ENGR MGR	IP	Richard.Green3@ipaper.com	985-732-8502
9	Frank Arrufat	Maintenance Manager	IP	frank.arrufat@ipaper.com	985-516-4324
10	Angus MacIntire	Primary Products BUM	IP	angus.macintire@ipaper.com	513-262-9083
11	Nakia Cowan	Operations Manager	IP	nakia.cowan@ipaper.com	601-529-6786
12	Alban Bush	Environmental Manager	IP	alban.bush@ipaper.com	985-732-8506
13	Donata Bolden	HR Manager	IP	donata.bolden@ipaper.com	985-732-8740
14	Matthew Vail	Manufacturing Excellence Mgr	IP	matthew.vail@ipaper.com	985-732-8634
15	Clint Casanova	Env. Engineer (Air)	IP	clint.casanova@ipaper.com	985-732-8697
16	BERNIE CHAUVIN	MILL MGR	IP	bernie.chauvin@ipaper.com	985-732-8200
17	LAURA CONNOR	ENV., HEALTH & SAFETY MGR	IP	laura.connor@ipaper.com	985-732-4139
18	Katie O'Quin	Env. Engineer	IP	katie.oquin@ipaper.com	985-705-1683
19					
20					

Appendix 3

Document Request

INTERNATIONAL PAPER COMPANY, BOGALUSA MILL
BOGALUSA, LOUISISANA
EPA REGION 6 RECORDS/DOCUMENTS REQUEST

GENERAL PROCEDURE

During the Clean Air Act (CAA) compliance investigation at International Paper Company - Bogalusa Mill (the "Mill"), inspectors will be reviewing records kept for your facility. To expedite this portion of the investigation, EPA is providing you advanced notification of the records that will likely be reviewed on-site. For most documents, EPA will review the records on-site and request copies, as needed. In certain cases, document copies, either electronic or paper, will be requested for later review by EPA.

In preparation for this compliance investigation, EPA has divided this record and document request into two sections. The first section consists of documents that EPA would like available and copies prepared (as noted) on September 10, 2018. The second section consists of general and specific documents that will most likely be reviewed by EPA inspectors during the inspection. Other documents may also be requested that are not listed. During the investigation, EPA will work with the Mill to develop a schedule to review these documents.

PART 1 - Please have these documents available on September 10, 2018

1. Description for all process areas including process flow diagrams (3 copies)

2. Site map of the facility (3 copies)

3. Facility organizational chart (including overall responsibilities, Risk Management Program responsibilities, and environmental department) (1 copy)

4. Information on change of ownership or separation of divisions (subsidiaries) within the last 5 years (1 copy)

5. Effective Title V Operating Permits for the last 3 years, with applications (1 copy)

6. Identification of all process areas subject to NESHAP or MACT requirements with documentation for any sources claimed to have negative applicability (1 copy)

7. For 40 CFR Part 63, Subpart S provide:
   A. Initial notification report (1 copy)
   B. Notification of compliance status (1 copy)
   C. Semiannual reports from 2015 to present (1 copy)
   D. Initial performance tests for emissions sources subject to §§ 63.443 and 63.446

(electronic copy, if possible)

E. Start-up, shut-down, and malfunction plan (1 copy)
F. Visual inspections of closed vent system from 2015 to present, annual inspections, and the site-specific inspection plan (electronic copy, if possible)
G. Requests and approvals for alternatives and/or variances from requirements (1 copy)
H. For all continuous monitoring systems (i.e. COMS, CEMS, CPMS etc.) at each air pollution control device, provide continuous monitoring data in electronic format for each monitored parameter used to demonstrate continuous compliance with 40 CFR Part 63, Subpart S and/or permit requirements. Please provide the data (preferably in Microsoft Excel format) from 2015 to present.

8. For 40 CFR Part 63, Subpart MM provide:
   A. Initial notification report (1 copy)
   B. Notification of compliance status (1 copy)
   C. Initial performance tests used to establish operating ranges for monitoring parameters (electronic copy, if possible)
   D. Semiannual reports from 2015 to present (1 copy)
   E. Start-up, shut-down, and malfunction plan (1 copy)
   F. Requests and approvals for alternatives and/or variances from requirements
   G. For all continuous monitoring systems (i.e. COMS, CEMS, CPMS etc.) at each pollution control device, provide continuous monitoring data in electronic format for each monitored parameter used to demonstrate continuous compliance with 40 CFR Part 63, Subpart MM and/or permit requirements. Please provide the data (preferably in Microsoft Excel format) from 2015 to present.

9. For 40 CFR Part 63, Subpart DDDDD provide:
   A. Initial notification report (1 copy)
   B. Notification of compliance status (1 copy)
   C. Initial performance tests used to establish operating ranges for monitoring parameters (electronic copy, if possible)
   D. Semiannual reports from initial date of compliance to present (electronic copy, if possible)
   E. Requests and approvals for alternatives and/or variances from requirements (electronic copy, if possible)
   F. For all continuous monitoring systems (i.e. COMS, CEMS, CPMS etc.) at each pollution control device, provide continuous monitoring data in electronic format for each monitored parameter used to demonstrate compliance with 40 CFR Part 63 Subpart DDDDD and/or permit requirements. Please provide data from the date of compliance to present.

10. For 40 CFR Part 60, Subparts D, Db, and BB, provide:

A. Initial performance tests used to establish operating ranges for monitoring parameters (electronic copy, if possible)
B. Semiannual reports from 2015 to present
C. Requests and approvals for alternatives and/or variances from requirements (electronic copy, if possible)
D. For all continuous monitoring systems (i.e. COMS, CEMS, CPMS etc.) at each pollution control device, provide continuous monitoring data in electronic format for each monitored parameter used to demonstrate compliance applicable federal and/or permit requirements. Please provide the data (preferably in Microsoft Excel format) from 2015 to present.

11. Excess emission summary reports for 2015 to present (1 copy)

12. For all CEMS and COMS, provide the pages of each QA/QC activity - activities such as CGAs, RATAs, optical alignment checks, etc. - that include the date of the activity and summary tables. (electronic copy, if possible)

13. List all opacity monitor and parameter sensor downtimes, including starting and ending dates/times from 2015 to present. (1 copy)

14. List all process unit shut-downs that have occurred during the last 3 years, including starting and ending dates/times. (1 copy)

15. Description of any wastewater treatment plants (WWTP) including schematic diagrams which include any process changes since submittal of the NPDES permit application (electronic copy, if possible)

16. Water balance diagram (1 copy)

17. For the calendar years 2015, 2016, and 2017 list all reportable releases, the root cause, and corrective action taken for each event. (electronic copy, if possible)

PART 2 - Documents likely to be requested by EPA inspectors (Schedule TBD)

1. Enforcement Actions/Notices of Violations (NOVs)

2. Consent Decrees/Orders/Agreements and related correspondences

3. List of laboratories (on-site and off-site) and types of analyses conducted

4. Provide all subsequent stack test/performance test reports describing methods used, test data, calculations, test results and process weights. Include all test data from tests done by the company, consultants, or regulatory agencies.

5. All correspondence regarding spills, bypasses, or upsets during the last 3 years

Appendix 4

Closing Conference Sign-in Sheet

Meeting with: International Paper Company - Bogalusa Mill **Date:** 9 / 13 / 18

Purpose of meeting: Inspection

	Name	Title	Representing	E-mail	Phone
1	James Haynes	Physical Scientist	EPA R6	haynes.james@epa.gov	214-665-8546
2	Clint Casanova	Env. Engineer	IP	clint.casanova@ipaper.com	985-732-8697
3	Cliff Whitam	Senior Reg. Env Manager	IP	cliff.whitam@ipaper.com	
4	BERNIE CHASIN	MILL MANAGER	IP	bernie.chasin@ipaper.com	985-732-8300
5	LAURA CONNOR	MGR. ENV., [illegible]	IP	laura.connor@ipaper.com	985-732-9130
6	Robert Vinson	Utilities OMC	IP	robert.vinson@ipaper.com	985-241-2570
7	Angus MacIntire	Primary Products BUM	IP	angusmacintire@ipaper.com	513 262 9083
8	Michelle Davis	Powerhouse APM	IP	michelle.davis@ipaper.com	985-516-1629
9	RICHARD GREEN	ENGINEERING MGR	IP	Richard.Green3@IPAPER.com	985-732-8502
10	ROBERT HAMBLETON	PULP AMEL	IP	ROBERT.HAMBLETON@IPAPER.com	985-241-7395
11	Sarah Frey	Env. Scientist	EPA R4	frey.sarah@epa.gov	214-665-6499
12	James Leathers	Env Engineer	EPA R6	Leathers.james@epa.gov	214-665-6569
13	Davina Witte	Env. Scientist 4	DEQ	davina.witte@la.gov	504-736-7730
14	Susan Mace Rahey	Env. Scientist 2	DEQ	susan.rahey@la.gov	504-736-7747
15	Tyler Williams	Env. Scientist 1	DEQ	tyler.williams@la.gov	504-736-7729
16	Katie O'Quin	Env. Engineer	IP	katie.oquin@ipaper.com	985-516-8304
17	Albam Bush	Env. Manager	IP	Albam.bush@ipaper.com	985.516.3075
18					
19					
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Appendix 5

Permit No. 3060-00001-V9AA, Selected Pages (Regulatory Applicability)

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Bogalusa Mill
Agency Interest No.: 38936
International Paper Company
Bogalusa, Washington Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR Part 60 Subpart									40 CFR Part 61			40 CFR Part 63 Subpart					40 CFR	
		A	K	D	Da	Db	Dc	GG	BB	JJJJ	A	J	M	A	5D	S	MM	4Z	64	82
UNF001	Bogalusa Mill	1											1	1		1	1			1
ARE001	27 – Wastewater Treatment System																			
EQT005	04 – Smelt Dissolving Tank No. 20								1								1			
EQT006	05 – Lime Kiln															1	1			
EQT007	06 – Hogged Fuel Boiler No. 10C					1									1				3	
EQT008	20 – Recovery Furnace No. 20																1			
EQT009	21 – Hogged Fuel Boiler No. 12			1											1				3	
EQT010	22 - Recovery Furnace No. 21								1							1	1			
EQT011	23 – Smelt Dissolving Tank No. 21								1								1			
EQT013	25A – BLO Primary Tank																			
EQT013	25B – BLO Secondary Tank																			
EQT018	26D – Paper Machine No. 7																			
EQT019	26E – Paper Machine No. 8																			
EQT020	28 – Tall Oil Reactor																			
EQT021	40A – Southyard Tank (50% BL)																			
EQT022	40B – North Strong Liquor Tank (50% BL)																			
EQT023	40C – Post-Ox Black Liquor Tank																			
EQT024	40D – Pre-Ox Black Liquor Tank																			
EQT026	43B – Causticizer No. 1																			
EQT027	43C – Causticizer No. 2																			
EQT028	43D – Causticizer No. 3																			

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Bogalusa Mill
Agency Interest No.: 38936
International Paper Company
Bogalusa, Washington Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR Part 60 Subpart									40 CFR Part 61			40 CFR Part 63 Subpart					40 CFR	
		A	K	D	Da	Db	Dc	GG	BB	JJJJ	A	J	M	A	5D	S	MM	4Z	64	82
EQT032	45A – HD Storage Tank - East																			
EQT033	45B – HD Storage Tank - West																			
EQT034	45C – Small Digester HD Storage Tank																			
EQT038	58A – Weak Liquor Storage Tank No. 1																			
EQT039	58B – Weak Liquor Storage Tank No. 2																			
EQT040	58C – Soap Skimmer Tank (Weak BL)																			
EQT041	61A – Sawdust Cyclone																			
EQT042	61B – Rechipper Cyclone																			
EQT043	64 – No. 6 Fuel Oil Tank																			
EQT044	67 – Gasoline Tank																			
EQT049	LVHC1 – Multiple Effects Evaporator Hotwell								1							1				
EQT050	LVHC2 – Turpentine Decanters								1							1				
EQT051	LVHC3 –Large Digester through Turpentine Condenser No. 1 and No. 2								1							1				
EQT052	LVHC4 –Small Digester through Turpentine Condenser No. 3								1							1				
EQT053	LVHC5 – Recovery Furnace No. 21 Concentrator								1							1				
EQT055	HVLC2 –Large Digester Chip Bin via Chip Bin Condenser								1							1				
EQT056	HVLC3 – Large Digester Diffusion Washer/Filtrate Tank								3							1				
EQT058	HVLC5 – Small Digester Washer Hoods								3							1				
EQT061	HVLC8 –Contaminated Warm Water Tank								1							1				
EQT062	HVLC9 –Small Digester Blow Tank								1							1				
EQT066	40E – Deaerator Tank																			

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Bogalusa Mill
Agency Interest No.: 38936
International Paper Company
Bogalusa, Washington Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR Part 60 Subpart									40 CFR Part 61			40 CFR Part 63 Subpart					40 CFR	
		A	K	D	Da	Db	Dc	GG	BB	JJJJ	A	J	M	A	5D	S	MM	4Z	64	82
EQT067	40F – 70% Black Liquor Storage Tank																			
EQT068	58D – Boil Out Storage Tank																			
EQT069	68A – Paper Machine Oil Tank (No. 7 Paper Machine)																			
EQT070	68B – Paper Machine Oil Tank (No. 8 Paper Machine)																			
EQT076	49 – No. 20 Salt Cake Mix Tank																			
EQT077	50 – No. 21 Salt Cake Mix Tank																			
EQT079	SN-73B – New Log Debarker																			
EQT080	43E – New Lime Slaker																			
EQT081	74A -- South LD Tank (PM7)																			
EQT082	74B -- North LD Tank (PM8)																			
EQT083	75 -- Post HD Screening System															3				
EQT084	76 -- Recovery Area Spill Tank																			
EQT085	Influent Plant Backup Generator																	1		
EQT086	Lime Kiln Auxilliary Drive																	1		
EQT087	Fire Pump Auxilliary Drive																	1		
EQT088	Outfall Emergency Backup Generator									1								1		
EQT089	Admin Building Emergency Generator																	1		
FUG001	61C – Bark Pile Fugitives																			
FUG002	61D – Chip Pile Fugitives																			
FUG003	Cond.2 – Pulp Mill Turpentine Decanter Underflow Standpipe															1				

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Bogalusa Mill
Agency Interest No.: 38936
International Paper Company
Bogalusa, Washington Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR Part 60 Subpart									40 CFR Part 61			40 CFR Part 63 Subpart					40 CFR	
		A	K	D	Da	Db	Dc	GG	BB	JJJJ	A	J	M	A	5D	S	MM	4Z	64	82
FUG004	Cond.1 – Evaporator Turpentine Decanter Underflow Standpipe															1				
FUG005	Cond.3 – Evaporator Process Condensate Header															1				
FUG006	Cond.4 – Warm Water Tank															1				
FUG007	Cond.5 – Surface Condenser Condensates															1				
FUG010	62 –Paved and Unpaved Roads																			
FUG011	66 – Recycle Fiber Fugitives (Repulpers)																			
FUG012	72A – Lime Storage and Handling																			
FUG013	72B – Ash Storage and Handling																			

KEY TO MATRIX

1 - The regulations have applicable requirements that apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.

2 - The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.

3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Bogalusa Mill
Agency Interest No.: 38936
International Paper Company
Bogalusa, Washington Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT086	Standards of Performance for Stationary CI ICE [40 CFR 60 Subpart JJJJ]	DOES NOT APPLY. This gasoline IC engine was manufactured prior to January 1, 2009 (emergency engine).
EQT085 EQT087 – EQT089	Standards of Performance for Stationary SI ICE [40 CFR 60 Subpart IIII]	DOES NOT APPLY. These diesel IC engines were manufactured prior to July 11, 2005.
EQT083	NESHAP from the Pulp and Paper Industry [40 CFR 63 Subpart S]	EXEMPT. The screen system is located after the high density storage tanks. [40 CFR 63.441]
EQT056, EQT058	NSPS Subpart BB—Standards of Performance for Kraft Pulp Mills [40 CFR 60 Subpart BB]	EXEMPT. EQT 56 is a diffusion washer. 40 CFR 60.281(e). EQT 58 qualifies as an exempt system per 40 CFR 60.283(a)(1)(iv).
EQT049 – EQT053 EQT055 – EQT056 EQT058, EQT062	NSPS Subpart BB—Standards of Performance for Kraft Pulp Mills [40 CFR 60 Subpart BB]	EXEMPT FROM TEMPERATURE MONITORING. These gases are assumed to be subjected to a minimum temperature of 650 °C (1200 °F) for at least 0.5 second (10-4-1993 EPA Region IV letter to GA EPD); therefore, no temperature monitoring is required [40 CFR 60.283(a)(1)(iii)]"
EQT006, EQT008	NSPS Subpart BB—Standards of Performance for Kraft Pulp Mills [40 CFR 60 Subpart BB]	DOES NOT APPLY. Source was constructed prior to September 24, 1976. [40 CFR 60.280(b)]
EQT043	Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. Contents have a true vapor pressure less than 1.5 psia at storage conditions. [LAC 33:III.2103]
	Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984. [40 CFR 60 Subpart Ka]	DOES NOT APPLY. No. 6 fuel oil is not considered a petroleum liquid. 40 CFR 60.111a(b)
The above table provides explanation for either the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.		