



Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):		
Media Program:		
Regulatory Program(s):		
Company Name:		
Facility Name:		
Facility Physical Location:		
City, State Zip Code:		
Mailing Address:		
City, State Zip Code:		
County/Parish:		
Facility Phone Number:		
Facility Contact Information:		
FRS Number:		
Identification/Permit Number:		
Media Identifier Number:		
NAICS:		
SIC:		
Personnel participating in inspection		
Name:	Affiliation/Mailcode:	Title:
Inspector Signature/Date:		
Inspector Name:		
Supervisor Signature/Date:		
Supervisor Name:		

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Dr. Sarah Frey and Mr. Justin Chen and TCEQ inspector Rachel Cunningham (“inspection team”) arrived at the International Paper Company (“IP”) Orange Mill (“Mill” or “facility”) at 1:00 pm on Tuesday, February 18, 2020 for an announced inspection. We met with Frank Fraccastoro, Environmental, Health, and Safety Manager (“EHS”) at the security desk. At the Opening Conference, we presented our credentials to IP Orange Mill Manager Mike Culbertson. Mill representatives attending included Frank Fraccastoro/EHS Manager, Oren Ruth Jr./Maintenance Manager, Keith Love/Power Business Unit Manager, Colby Nelms/Kiln Area Process Manager, Kelly Winnon/Power Subject Matter Expert (“SME”), Troy Widdell/Fiber SME, Ashish Jain/Environmental Engineer, Andrew Carlquist/Safety Engineer, and Stephen Greer/Environmental Engineer. We informed them that this was an 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 Emissions Standards for Hazardous Air Pollutants (“NESHAP”). The scope of the inspection is a partial compliance evaluation (“PCE”) and includes an evaluation of the facility’s compliance with its Title V operating permit and the applicable CAA regulations. Photographs and videos taken during the inspection can be found in Appendix 1 and 2, respectively. The sign-in sheet for the opening conference is attached as Appendix 3.

FACILITY DESCRIPTION

IP’s Mill is a kraft pulp and paper mill in Orange County, Texas, and is permitted to operate 365 days per year. The parent company is headquartered in Memphis, Tennessee. The Mill has approximately 500 full time employees and 100 contractors. Built in 1967, the 1200-acre Mill produces approximately 2300 tons of linerboard paper (for packaging) per day. The Mill was expanded in 1977 and has two continuous digesting lines for processing softwood. IP purchased the Mill from Temple-Inland in 2012. The Mill currently operates under Title V permit number O1408, issued January 27, 2016 and expiring January 27, 2021.

Primary operations at the Mill include the woodyard, pulp mill, chemical recovery, caustic plant, power, papermaking, and wastewater treatment. Evaluation of the woodyard and papermaking area are outside the scope of this inspection.

The facility operates two continuous, identical pulping lines, titled as the A-line and the B-line. Chips are fed from chip bins into steaming vessels where both fresh and flash steam is utilized. The chips are then cooked in the continuous Kamyr digesters, sent through blow tanks, refiners, and screens. The A-line feeds into either the horizontal Chemiwasher or the A-line vacuum drum Brownstock Washer (“BSW”). The B-line feeds into either the B-line BSW or A-line BSW. Marketable turpentine is collected from the cooking process and sold. Washed pulp is stored in high density storage tanks before entering the papermaking area.

The chemical recovery and causticizing processes include the following: spent liquor, or black liquor ("BL"), is sent from the filtrate tanks and digesters to the BL storage tanks. Next, BL is concentrated in the multiple effect evaporator and stored in strong BL tanks. Tall oil soap is a byproduct of the evaporation process and treated in the tall oil plant to produce crude tall oil. The concentrated (also known as heavy) BL is sent through the No. 1 or No. 2 dry bottom precipitator, cyclone, and salt cake mix tanks before being burned in a recovery furnace ("RF") to produce smelt. Particulate matter from each RF is controlled by electrostatic precipitators. The smelt flows into one of two dedicated smelt dissolving tanks ("SDT"), both of which are controlled with wet scrubbers. Green liquor from the SDTs is clarified and mixed with lime (calcium oxide) to regenerate white liquor. The resulting lime mud is oxidized back to lime in the Lime Kiln, which has its emissions controlled with a wet scrubber.

The power operations include the two RF, the Bark Boiler, and the No. 1 and No. 3 Power Boilers, all of which provide steam for other mill production areas. The power boilers burn natural gas and propane as an emergency backup. The Bark Boiler is permitted to burn wood, bark, natural gas, waxed cardboard boxes, and propane. It is controlled by a wet scrubber. Non-condensable gases ("NCG"), which are grouped as low-volume, high concentration (LVHC) and high-volume, low concentration (HVLC) gases, are collected and combusted. The LVHC gases are controlled in the Lime Kiln and Bark Boiler. The HVLC gases originating from the vacuum drum washers were originally uncontrolled and offset via a Clean Condensate Alternative ("CCA") plan. Since 2009, all HVLC streams have been collected and incinerated in the Bark Boiler or Lime Kiln to avoid triggering Prevention of Significant Deterioration ("PSD") requirements. The Mill still operates within the requirements of the CCA.

The wastewater treatment system ("WWTS") processes approximately 15 million gallons of wastewater per day. Wastewater flows to either the strong waste pond or the primary clarifier before entering the aeration stabilization basin ("ASB") and being stored in Adam's Lake, which serves as a 600-acre holding pond. Sludge removed from the treatment system is dewatered and sent to a landfill. Water is discharged into the Sabine River.

Section II - OBSERVATIONS

On February 18, 2020 after I, Sarah Frey, presented credentials and identification to the responsible officials, we discussed our plans for the inspection, including that our focus would be on NSPS Subpart BB and NESHAPs Subpart S, MM, and DDDDD. After discussions about safety, scheduling, photographs, and confidential business information ("CBI"), Mr. Culbertson gave an introduction to International Paper and the Orange Mill. Mr Culbertson stated that he became Mill Manager in November 2019, replacing Mr. Ed Barr. Next, we discussed the status of the records requested on February 13, 2020 (Appendix 3, Document Request).

Next, the inspection team discussed process details with Mr. Jain, Dr. Greer, Mr. Fraccastoro, Mr. Waddell, and Mr. Winnon. We reviewed the maps and block diagrams provided, detailing the digesting, washing, and storage of pulp prior to papermaking. We also discussed the control of HVLC gases, LVHC gases, and pulping condensates. I was informed that the Leak Detection and Repair ("LDAR") inspections

were conducted by a contractor, Environmental 360 ("E360") beginning in February 2017. We discussed the Power and Recovery areas and the chemical recovery processes. The inspection team departed the facility at approximately 5pm.

On Wednesday, February 19, the inspection team arrived at the Mill at 8am. We continued discussions of the processes with Dr. Greer and Mr. Jain. We discussed the WWTS in greater detail and I asked for the Standard Operating Procedures for the Quarterly Performance Tests. We began a driving tour of the WWTS led by Mr. Jain and Dr. Greer. We viewed where the hardpipe enters the ASB Zone 1 (Photo 1 and 2) and noted discrepancies between Figure 16 of the Leak Detection and Repair ("LDAR") schematics and what we observed. Piping lines in the schematic indicated connections that would allow pulping condensates to bypass the appropriate discharge point. We drove around the ASB, viewing the sampling locations for all 5 zones then walked a portion of the hardpipe to confirm that the pulping condensates were not diverted prior to entering the biological treatment process. Next, we drove to Adam's Lake, which serves as the holding pond prior to discharging to the Sabine River. We observed diverse wildlife and returned to the conference room.

At 11am, the inspection team began a field tour of the Pulp Mill accompanied by Mr. Jain, Dr. Greer, Mr. Ricky Farmer (Area Process Manager - Pulp), and Mr. Torry Gannon (contractor, E360). We observed the chip conveyors from the 3rd floor and confirmed that there is no pre-chip bin steaming. Steam from the low pressure feeder enters the chip bin. We observed visible emissions at Chip Bin A (Photo 3), but not from Chip Bin B (Photo 4). Mr. Farmer explained that white liquor is first introduced in the chip chute. From this level, we viewed the A and B continuous digesters (Photos 5 and 6). One floor down, we viewed the low pressure feeders and steaming vessels. We observed visible emissions coming from the condensate flash tank return line, entering the A steaming vessel (Photo 7). We observed steam leaks coming from the B steaming vessel. We were then joined by Mr. Troy Waddell. Next, we viewed the A and B single stage rotary drum BSWs. We observed visible emissions from the hood of BSW A (Video 1) and liquid leaks from the seal, at the doors, and on the backside of the washer (Photo 8). We detected odors and observed historical and active black liquor leaks at BSW B. We confirmed the vents connecting to the NCG header and LDAR components.

Next, we viewed the horizontal Chemiwasher and its blowers. We observed visible emissions coming from the air inlet piping, which is tied to the NCG header (Video 2). We observed a hole at the top of the Chemiwasher hood near the entrance roll (Photo 9). From the top of the hood, we observed a large liquid leak near the entrance roll (Photo 10). We observed visible emissions from the east and west sides of the roof, as well as the edges of the entrance and exit rolls (Video 3). We observed visible emissions from the sight glass at the entrance of the washer and a door at the midpoint of the washer body.

We viewed the HVLC/Chemiwasher collection tank and the #4 reject refiner. We observed BL discharging from the #4 reject refiner (Photo 11). Mr. Waddell stated that the refiner was out of service and the BL would flow into the drains which route to the Strong Waste Pond. We viewed the Reject Tank 506-010-005 and observed visible emissions at the top. We viewed the A and B high pressure feeders and were told that the A-line high pressure feeder is due to be replaced soon. We viewed the blow

tanks. Mr. Waddell described how temperature probes are used to ensure that the HVLC gases are not being released into the atmosphere from the air intake vents.

After lunch, we returned to the field to view the turpentine recovery area, including the standpipe and decanter. We compared components to the LDAR schematics. We viewed the Chemiwasher condensate collection tank and LVHC foul condensate collection tank. We observed where the tanks tie into the hardpipe that transports pulping condensates to the WWTS. We then viewed the piping where the NCG gas header can switch to route to the Bark Boiler for incineration. I confirmed LDAR components with Figures 11 and 10 of the LDAR Schematics. Next, we visited the lime kiln with Mr. Colby Nelms, Area Process Manager. We observed the LVHC, HVLC, and Tall Oil Scrubber gas headers entering the lime kiln. At the time, HVLC and LVHC gases were being sent to the Bark Boiler. We followed the piping from the lime kiln to the hotwells and confirmed LDAR components on the old and new hotwell.

Next, we observed the multieffect evaporators, combined condensate tank, and surface condensers. Mr. Kelly Winnon, Subject Matter Expert ("SME") of Power led us through the power area to view where the HVLC and LVHC headers enter the Bark Boiler. We viewed the LVHC gas cooler and steam injector. Mr. Winnon pointed out the valves that direct NCGs to the lime kiln instead of the Bark Boiler. We visited the control room and had conversations with the operators about when the Bark Boiler can accept NCGs, Recovery Furnace ("RF") continuous emission monitoring systems ("CEMS"), and steps that operators can take to bring the RFs back into compliance if they are exceeding the parameters.

We departed the power area and met with Mr. Ryan Brown, the full time CEMS technician contractor. The CEMS were replaced/upgraded in October 2018 and February 2019 for the power boilers and the RFs, respectively. We viewed the calibration gases, and all were within the expiration dates. We returned to the conference room at 3:45pm. I asked why the knotters and screens were not controlled and Mr. Fraccastoro provided calculations showing that the equipment is below the regulatory threshold. We discussed the automated controls, CEMS, and LDAR procedures with Mr. Jain. He explained how he assembles his periodic reports and Title V Deviation Reports. We discussed the day's observations with Mr. Culbertson, Mr. Fraccastoro, Mr. Waddell, Mr. Nelms, Mr. Winnon, Mr. Farmer, Mr. Jain, Dr. Greer, and Mr. Carlquist. The inspection team departed the facility at 5:15pm.

On Thursday, February 20, the inspection team arrived at the Mill at 8am. Discussions of the Mill processes and control options continued with Mr. Fraccastoro, Mr. Jain, and Dr. Greer. I inquired about LDAR inspection frequencies, and Mr. Jain stated that original request for alternative frequency was submitted and approved between 2001 and 2003, however the Mill was unable to locate the documentation. The Mill sent a letter in March 2013 requesting re-approval, but it is unclear if TCEQ or EPA provided a response. Mr. Jain provided the inspection team with additional documents, as requested. I reviewed the WWTS Quarterly Performance Tests and discussed how continuous compliance is achieved. The 2019 biological treatment efficiency can be found in Table 1. In the second quarter 2019, the Mill began using a 3-day protocol instead of a 15-day protocol. It was stated by facility staff that continuous compliance is ensured by operating a minimum of 24 aerators.

Table 1. Percentage of Methanol Removed from WWTS by Biological Processes (Fbio).

Year	Quarter	Fbio
2019	1	92.8%
2019	2	98.6%
2019	3	99.0%
2019	4	94.9%

We reviewed LDAR and CEMS data. I found that August 2017 inspections were missed due to Hurricane Harvey. I reviewed 2017 monthly LDAR inspection records and found that the BSWs are frequently identified as leaking. Visible emissions were identified 6 out of 11 months at the A BSW and 4 out of 11 months at the B BSW. We discussed specific conditions with Mr. Jain and Mr. Fraccastoro. Specifically, PSD Permit special condition #18 states that uncontrolled emissions from A-line BSW A and B-line BSW is allowed uncontrolled emissions for washing up to 38,752 oven dried tons of pulp per year. Mr. Fraccastoro stated that the facility does not operate the washers without routing vapors to an incineration device, contrary to the permit condition. We discussed equipment subject to NSPS BB, including the Chemiwasher, filtrate tank, and Chemiwasher combined condensate tank. The BSWs are not subject to this rule, as they began operating prior to September 24, 1976. I asked if the Bark Boiler had continuous temperature monitoring when incinerating gases from the Chemiwasher. Mr. Jain said that there is no temperature monitoring.

Compliance evaluation for NESHAP MM and DDDDD will be performed off-site.

Section III – AREAS OF CONCERN

EPA Region 6 Inspectors Dr. Frey and Mr. Chen conducted a closing conference at International Paper Company, Orange Mill at 3:00 pm on Thursday, February 20, 2020. During the closing conference, Dr. Frey reviewed the following Areas of Concern noted during the inspection. The sign-in sheet for the inspection closing conference is included as Appendix 5. We shared a digital copy of all photographs and videos captured with Mr. Jain. The Mill made no claims of confidential business information on the photographs, videos, or documents provided.

1) The Mill may have misinterpreted the requirements of NSPS BB. Per §60.283(a)(1)(iii) and §60.284(b)(1), the incinerator or other devices (excluding lime kilns and recovery furnaces) combusting applicable streams must maintain a minimum temperature of 650 °C and must have a continuous monitoring device for temperature. Gases from the washers are routed to either the lime kiln or Bark Boiler. The Bark Boiler does not have a temperature monitoring device.

2) The Mill may be applying improper inspection frequencies for monthly visual LDAR inspections. Per §63.453(k)(1), visual inspection of closure mechanisms specified in §60.450(b) should be performed at least once every thirty days. Per §63.453(k)(2), visual inspection of closed vent systems should be performed every thirty days. The Mill was unable to provide documentation to confirm that an alternative monitoring frequency had been requested and approved. The range of days between inspections was between 20 and 55.

3) The Mill may have incomplete or missing LDAR inspections. When reviewing LDAR monthly inspection records, there were a handful of instances of incomplete monitoring or missing records. The February 2017 and October 2018 inspections were incomplete for some components on Figures 7 and 17. In addition, a pattern of repeating leaks appeared at the Brownstock Washers.

4) The inspection team noted multiple areas where the LDAR site specific plan and inspection records can be improved. The Mill may find an opportunity for improvement in the current LDAR schematics and naming conventions throughout documentation. Car seals could be noted, open/closed indications for manual valves could be updated, and clarification on hotwell naming could be included.

5) Visible emissions, defects, or indicators of historical leaks were observed by the inspection team, including at the A-Line chip bin, steaming vessel, and BSW; the Chemiwasher; and the #4 Reject Refiner. Per §63.443(c), specified equipment must be enclosed and vented into a closed-vent system and routed to a control device to prevent the release of HAPs to the atmosphere. According to the March 31, 2000 EPA Guidance "Questions and Answers for the Pulp and Paper NESHAP, Second Volume", if the steam entering the chip bin is not fresh steam, then it is considered a chip steamer and may need to be controlled.

The following AOC was noted during off-site review, subsequent to the onsite inspection:

6) The Mill may not be adequately repairing leaks identified during monthly LDAR Inspections. 35 months of inspection records were reviewed. Table 2 indicates the number of months that some components were discovered to be leaking. Per §63.453(k)(6)(i) and (ii), the first attempt of repair must occur within 5 days and the final repair must be complete within 15 days of discovery.

Table 2. Frequencies of leaks detected at select pieces of equipment each year

Component Name	Component ID	Number of months identified as leaking		
		2017*	2018	2019
A-line Brownstock Washer	HAP-17000	6	6	6
B-line Brownstock Washer	HAP-17026	4	3	4
Loop Seal Overflow on Turpentine Underflow Standpipe	HAP-2000A	0	10	8
Pressure Vacuum Breaker on the LVHC Line from Turpentine Underflow Standpipe	PVB-2020	0	5	0
Loop Seal Overflow on the Chemiwasher Condensate Collection Tank at Lime Kiln	HAP-12013	0	6	2

*Due to Hurricane Harvey, no August inspection occurred in 2017. 11 months were reviewed for 2017 and 12 months were reviewed for 2018 and 2019.

Section IV – FOLLOW UP

The following information was received by EPA on February 28, 2020, after exiting the Facility on February 20, 2020.

- Electronic copies of December 2016 and January 2017 LDAR inspections.
- Shutdown records for 2017, 2018, and 2019.
- Documentation supporting why IP Orange does not believe that temperature monitoring on the Bark Boiler is required.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 11 photos taken

Appendix 2 – Video Log – 3 videos taken

Appendix 3 – Opening and closing conference sign-in sheet

Appendix 4 – Document Request List

Appendix 5 – Closing Conference sign-in sheet

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: International Paper Company - Orange Mill		
City: Orange	County/Parish: Orange	State: Texas



Photo File Name: DSCN0461.JPG

Date of Photo: 2/19/2020

Time of Photo: 9:30 am

Photographer: J. Chen

Description: Zone 1 of aeration stabilization basin (ASB) of wastewater treatment system. Pulping condensates are discharged under the surface prior to the first aerator, shown here.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: International Paper Company - Orange Mill		
City: Orange	County/Parish: Orange	State: Texas



Photo File Name: DSCN0462.JPG

Date of Photo: 2/19/2020

Time of Photo: 9:32 am

Photographer: J. Chen

Description: Hardpipe leading to Zone 1 of aeration stabilization basin (ASB) of wastewater treatment system. Pulping condensates flow through rubber piping and is discharged under the water surface.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: International Paper Company - Orange Mill		
City: Orange	County/Parish: Orange	State: Texas



Photo File Name: DSCN0463.JPG

Date of Photo: 2/19/2020

Time of Photo: 11:19 am

Photographer: J. Chen

Description: A-line Chip bin. Visible emissions observed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: International Paper Company - Orange Mill		
City: Orange	County/Parish: Orange	State: Texas



Photo File Name: DSCN0464.JPG

Date of Photo: 2/19/2020

Time of Photo: 11:20 am

Photographer: J. Chen

Description: B-line chip bin. No visible emissions observed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: International Paper Company - Orange Mill		
City: Orange	County/Parish: Orange	State: Texas



Photo File Name: DSCN0465.JPG

Date of Photo: 2/19/2020

Time of Photo: 11:22 am

Photographer: J. Chen

Description: B-line continuous digester.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: International Paper Company - Orange Mill		
City: Orange	County/Parish: Orange	State: Texas



Photo File Name: DSCN0466.JPG

Date of Photo: 2/19/2020

Time of Photo: 11:23 am

Photographer: J. Chen

Description: A-line continuous digester.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: International Paper Company - Orange Mill		
City: Orange	County/Parish: Orange	State: Texas



Photo File Name: DSCN0467.JPG

Date of Photo: 2/19/2020

Time of Photo: 11:27 am

Photographer: J. Chen

Description: Visible emissions emitting from A-line condensate flash tank return line to steaming vessel.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: International Paper Company - Orange Mill		
City: Orange	County/Parish: Orange	State: Texas



Photo File Name: DSCN0469.JPG

Date of Photo: 2/19/2020

Time of Photo: 11:35 am

Photographer: J. Chen

Description: Liquid leaks observed at the A-line Brownstock Washer (BSW).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: International Paper Company - Orange Mill		
City: Orange	County/Parish: Orange	State: Texas



Photo File Name: DSCN0471.JPG

Date of Photo: 2/19/2020

Time of Photo: 11:57 am

Photographer: J. Chen

Description: Top of horizontal Chemiwasher hood. Broken panel, visible liquid and vapor emissions.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: International Paper Company - Orange Mill		
City: Orange	County/Parish: Orange	State: Texas



Photo File Name: DSCN0472.JPG

Date of Photo: 2/19/2020

Time of Photo: 11:59 am

Photographer: J. Chen

Description: Large water and black liquor leak towards first stage pulp washing (close to entrance roll) on horizontal Chemiwasher.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: International Paper Company - Orange Mill		
City: Orange	County/Parish: Orange	State: Texas



Photo File Name: DSCN0474.JPG

Date of Photo: 2/19/2020

Time of Photo: 12:20 pm

Photographer: J. Chen

Description: Black liquor leak from #4 Reject Refiner.

Appendix 2

Video Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Location: International Paper Company – Orange Mill		
City: Orange	County: Orange	State: Texas



Video File Name: [DSCN0468.mov](#)
 Date of Video: 2/19/2020
 Time of Video: 11:34 am
 Videographer: J. Chen
 Description: Brownstock Washer A. Visible emissions observed from multiple locations on hood.



Video File Name: [DSCN0470.mov](#)
 Date of Video: 2/19/2020
 Time of Video: 11:55 am
 Videographer: J. Chen
 Description: Air inlet piping to Chemiwasher, connected to non-condensable gas header. Visible emissions observed from flange.



Video File Name: [DSCN0473.mov](#)
 Date of Video: 2/19/2020
 Time of Video: 12:08 pm
 Videographer: J. Chen
 Description: Base of Chemiwasher, near exit roll, visible emissions observed. Suspected high-volume, low-concentration vapors.

Appendix 3

Opening Conference Sign-In Sheet

Opening/Pre-Inspection Meeting

Commence opening/pre-inspection meeting.....

Time:

1310

Name	Title	Representing	Telephone No.
Justin Chen	Env. Engineer	EPA RG	214-665-2273
Rachel Cunningham	Env. Investigator	TCEQ R.10	409-898-3838
Oren Ruck, Jr	Maintenance Mgr.	IP	409-221-9522
Mike Culbertson	Mill Manager	IP	256-508-5267
Frank Fraccastoro	EHS Manager	IP	409-313-1236
Achish Jain	Env. Engr.	IP	409-571-3233
Troy Waddell	SME FIBER	IP	409-746-7365
Keith Love	BUM Power	IP	318-461-0463
Colby Nelms	APM Kiln	IP	409-330-7493
ANDREW CARLQUIST	SAFETY ENGINEER	IP	409-790-2773
Stephen Greer	ENV. ENGINEER	IP	409-746-7279
Kelly Winton	SME-Power	IP	409-746-7536
Sarah Frey	Physical Scientist	EPA RG	214 665-6499

Conclude opening/pre-inspection meeting.....

Time:

1355

Initials / Date: JC / 2/18/20

Appendix 4

Document Request List

**INTERNATIONAL PAPER COMPANY, KRAFT LINERBOARD MILL
ORANGE, TEXAS
EPA REGION 6 RECORDS/DOCUMENTS REQUEST**

GENERAL PROCEDURE

During the Clean Air Act (CAA) compliance investigation at International Paper Company, Kraft Linerboard Mill in Orange, TX (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 three sections. The first section consists of documents that EPA would like available and copies prepared (as noted) on February 18, 2020. The second section consists of documents that EPA would like available electronically (on disk or thumb drive) no later than February 20, 2020. The third section consists of general and specific documents that will 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 February 18, 2020

1. Description for all process areas (3 copies and electronically)
2. Detailed process flow diagrams (3 copies and electronically)
3. Site map of the facility (2 copies and electronically)
4. Facility organizational chart (including overall responsibilities, Risk Management Program responsibilities, and environmental department) (1 copies and electronically)
5. Information on change of ownership or separation of divisions (subsidiaries) within the last 5 years (1 copy and electronically)
6. Effective Title V Operating Permits for the last 3 years, with applications (electronically)
7. Identification of all process areas subject to NESHAP or MACT requirements with documentation for any sources claimed to have negative applicability (1 copy and electronically)
8. 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)
9. Water balance diagram (1 copy and electronically)
10. Effective site-specific leak detection and repair (LDAR) monitoring plans for the last 3 years. (1 copy and electronically)

11. For 40 CFR Part 63, Subpart S provide (electronically, if possible):
 - A. Initial notification report
 - B. Notification of compliance status
 - C. Semiannual reports from 2016 to present
 - D. Initial performance tests for emissions sources subject to §§ 63.443 and 63.446
 - E. Most recent performance tests for emissions sources subject to §§ 63.443 and 63.446
 - F. Start-up, shut-down, and malfunction plan
 - G. Visual inspections of closed vent system from 2017 to present, annual inspections, and the site-specific inspection plan
 - H. Requests and approvals for alternatives and/or variances from requirements
 - I. A complete list of all bypass lines and method of flow indication for each
 - J. For all continuous monitoring systems (i.e. CMS, 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 or Access format) from 2016 to present.

PART 2 - Please have these documents available by February 20, 2020

12. For 40 CFR Part 63, Subpart MM provide (electronically, if possible):
 - A. Initial notification report
 - B. Notification of compliance status
 - C. Initial performance tests used to establish operating ranges for monitoring parameters
 - D. Most recent performance tests used to establish operating ranges for monitoring parameters
 - E. Semiannual reports from 2016 to present
 - F. Start-up, shut-down, and malfunction plan
 - G. Requests and approvals for alternatives and/or variances from requirements
 - H. 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 or Access format) from 2016 to present.

13. For 40 CFR Part 63, Subpart DDDDD provide (electronically, if possible):
 - A. Initial notification report
 - B. Notification of compliance status
 - C. Initial performance tests used to establish operating ranges for monitoring parameters
 - D. Semiannual reports from initial date of compliance to present
 - E. Requests and approvals for alternatives and/or variances from requirements
 - 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 (preferably in Microsoft Excel or Access format) from the date of compliance to present.

14. For 40 CFR Part 60, Subparts D, Db, and BB, provide (electronically, if possible):
 - A. Initial performance tests used to establish operating ranges for monitoring parameters
 - B. Semiannual reports from 2016 to present
 - C. Requests and approvals for alternatives and/or variances from requirements
 - 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 or Access format) from 2016 to present.
15. Excess emission summary reports for 2017 to present. (electronically)
16. 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)
17. List all opacity monitor and parameter sensor downtimes, including starting and ending dates/times from 2016 to present. (electronically)
18. List all process unit shut-downs that have occurred during the last 3 years, including starting and ending dates/times. (electronically)
19. For the calendar years 2017, 2018, and 2019 list all reportable releases, the root cause, and corrective action taken for each event. (electronic copy, if possible)

PART 3 - 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. 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 5

Closing Conference Sign-In Sheet

Exit interview / Out-briefing Meeting

Commenced meeting.....

Time: 1500

Name	Title	Representing	Telephone No.
Justin Chen	Environmental Engineer	EPA RG	214-665-2273
Stephen Grey	ENV ENG	IP	409 746 7279
Mike Culbertson	Mill Manager	IP	256-508-5267
Kelly Wynn	SME	I/R	909-216-9260
Bobby Beasley	Tech FL	IP	409 746 7416
Frank Fraccastore	EHS Mgr	IP	409 313 1236
Ashish Jain	ENV ENG	IP	409 571 3233
Andrew Carlquist	Safety Engineer	IP	409-790-2773
Colby Nelms	APM Kiln	IP	409-330-7493
Eric Davis Sr.	Central Servicing	IP	409-670-2901
Troy Waddell	Fiber SME	IP	409-746-7365
Picky Farmer	APM Pulp	IP	409-779-7585
Keith Hove	BUM Power	IP	409-746-7285
Rachel Cunningham	Env. Investigator	TCEQ	409-898-3838
Sarah Frey	Physical Scientist	EPA RG	214-665-6499

Conclude meeting.....

Time: 31520

Initials / Date:

JL, 2/29/2020