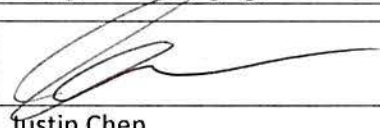
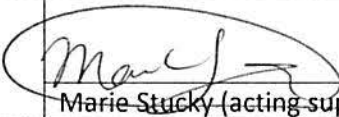


**Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT**

Inspection Date(s):	01/14-17/2020	
Media Program:	Air	
Regulatory Program(s)	Title V, NESHAP, NSPS	
Company Name:	Evergreen Packaging, Inc.	
Facility Name:	Pine Bluff Mill	
Facility Physical Location:	5201 Fairfield Rd.	
(city, state, zip code)	Pine Bluff, AR 71601	
Mailing address:	5201 Fairfield Rd.	
(city, state, zip code)	Pine Bluff, AR 71601	
County/Parish:	Jefferson	
Facility Phone Number	870-541-5892	
Facility Contact:	William Huyck	EHS&S Manager
	William.huyck@everpack.com	
FRS Number:	110000450878	
Identification/Permit Number:	AFIN: 3500016; PERMIT #0580-AOP-R15	
Media Identifier Number:	AFS 0506900016	
NAICS:	322110 – Pulp Mills; 322121 – Paper Mills; 322130 – Paperboard Mills	
SIC:	2611; 2631	
Personnel participating in inspection:		
Justin Chen	EPA/6ECD-AT	Inspector, Environmental Engineer
Sarah Frey	EPA/6ECD-AT	Inspector, Physical Scientist
Gary Bortz	ADEQ	Inspector Supervisor
John North	ADEQ	Inspector
William Huyck	Evergreen Packaging, Inc.	EHS&S Manager – Pine Bluff
Julie Brimer	Evergreen Packaging, Inc.	Environmental Manager – Pine Bluff
Otis Hill	Evergreen Packaging, Inc.	Pulp Manager – Pine Bluff
Garry Butler	Evergreen Packaging, Inc.	Power and Recovery Manager – Pine Bluff
Bernard Burns	Evergreen Packaging, Inc.	EHS Manager North America
Todd Beekman	Evergreen Packaging, Inc.	Business Unit Manager Pulp and Power – Pine Bluff
Kevin Kidder	Evergreen Packaging, Inc.	Operations Manager – Pine Bluff
James Ellison	Evergreen Packaging, Inc.	EHS Engineer 2 – Pine Bluff
EPA Lead Inspector Signature/Date	 Justin Chen	3/6/2020 Date
Supervisor Signature/Date	 Marie Stucky (acting supervisor)	3/6/2020 Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Dr. Sarah Frey and Mr. Justin Chen arrived at the Evergreen Packaging, Inc. (Evergreen) Pine Bluff Mill (Mill or facility) at 01:00 PM on Tuesday, January 14, 2020 for an announced inspection. We met with Mr. William Huyck, EHS&S Manager, in the lobby. Evergreen Pine Bluff Mill representatives attending the opening conference included Lisa Bowling/Environmental Consultant, Bernard Burns/EHS Manager North America, William Huyck/EHS&S Manager, Julie Brimer/Environmental Manager, Todd Beekman/Business Unit Manager Pulp and Power, Kevin Kidder/Operations Manager, Otis Hill/Pulp Manager, and Garry Butler/Power and Recovery Manager. The opening conference was also attended by Gary Bortz/Inspection Supervisor with the Arkansas Department of Environmental Quality (ADEQ). I presented my credentials to Mr. Huyck and informed him that this was a partial compliance evaluation (PCE) 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). Photographs and video 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

Evergreen's Mill is a pulp and paper mill in Jefferson County, Arkansas, and is permitted to operate 365 days per year. The company's headquarters is in Memphis, Tennessee. The Mill has approximately 976 full time employees. Built in 1958, the mill produces approximately 480,000 tons of liquid paper packaging product and 185,000 tons of coated paper product per year. The Mill has two pulp lines for processing hardwood and softwood. Evergreen acquired the Mill from International Paper on February 1, 2007. The Mill currently operates under Title V permit number O580-AOP-R15, issued April 17, 2017 and expiring April 16, 2022.

Primary operations at the mill include the woodyard, pulp mill (both chemical wood/kraft pulping and mechanical/groundwood pulping), bleaching, chemical recovery, caustic plant, power, paper making, and wastewater treatment. Evaluation of the woodyard and paper making are outside the scope of this inspection.

The facility operates two batch pulping lines, B-line (softwood) and C-line (hardwood). Chips are cooked in one of fourteen batch digesters, deknotted, washed in four-stage open-atmosphere Brownstock Washers, screened, and thickened before entering the bleaching process. Vapors from the batch digesters are collected and sent to the Blow Heat Accumulator (BHA) then to the Blow Heat Recovery Evaporators (BHRE) to recover heat and condense turpentine. The Turpentine Section (also known as the Pine Gas Off Section) of the First Effect Evaporator acts as the turpentine condenser for the mill, and the mixture of turpentine and condensate are sent through the Turpentine Condensate Cooler to the Turpentine Decanter. Condensate is collected from the BHA, Pre-Evaporator Foul Condensate Tank, and

the Turpentine Decanter Underflow Storage Tank, which is all sent to the Main Foul Condensate Tank. All condensate from the Main Foul Condensate Tank is piped to the segregated zone of the Mill's wastewater treatment system. Unbleached pulp is sent to the bleach plant: softwood brown pulp to the B-Line of the bleach plant and hardwood brown pulp to the C-Line of the bleach plant. The B-Line has a four-stage bleaching process and the C-Line has a three-stage bleaching process, both lines utilizing chlorine dioxide. The emissions from each bleach plant line is controlled by a single bleach plant scrubber.

The chemical recovery and causticizing process begins with spent liquor, or black liquor (BL), being sent to weak BL storage tanks and then sent through either the No. 1 or No. 2 set of multiple effect evaporators (MEE) and stored in strong (also known as heavy) black liquor storage tanks. Soap is a byproduct of the evaporation process and is sent to storage. Next, the liquor goes through the black liquor oxidation system where it is oxidized and then stored. The BL is burned in three direct contact recovery boilers (RB) known as the No. 2 RB, No. 3 RB, and the No. 4 RB. Particulate matter from each RB is controlled with its own electrostatic precipitator and exhaust stack. The smelt is treated in the No. 2, No. 3, and No. 4 Smelt Dissolving Tanks (SDT). The No. 2 SDT is equipped with a demister pad, while No. 3 and No. 4 are controlled with venturi scrubber systems. Green liquor from the SDTs is clarified and mixed with lime (CaO) to regenerate white liquor. The resulting lime mud is oxidized in the No. 1 and No. 2 Lime Kilns, which are controlled by water venturi scrubbers. Non-condensable gases (NCGs), more specifically low-volume, high concentration (LVHC) gases, are collected and combusted in the Lime Kilns from the pulp process. High-volume, low concentration (HVLC) gases are not collected and combusted. Dust from truck unloading activities, the fresh lime silo, the reburned lime silo, and the closed conveyance system are controlled with the Lime Handling Fugitives Dust Scrubber.

The power operations include the two RB and the No. 1, No. 2 Power Boilers (PB), and the Bark Boiler, all of which provide steam for other mill production areas. No. 1 PB fires natural gas only and has no control device. No. 2 PB is used only as a back-up and is considered a limited use boiler with no pollution control devices attached and is permitted to burn natural gas and fuel oils 2, 4, 5, and 6. The Bark Boiler is permitted to burn bark, dried sludge, natural gas, Nos. 2, 4, 5, and 6 fuel oils, used oil, poly scrap, paper scrap, Woodwaste, tire-derived fuel, and rice hulls. It typically fires bark, dried sludge, and natural gas. It is controlled by a wet venturi scrubber.

The wastewater treatment system (WWTS) is permitted to process a max of 2.5 million gallons of wastewater per hour or 13,870 million gallons of wastewater per twelve consecutive months. Wastewater flows through a primary clarifier and then on to secondary treatment which consists of the Aerated Stabilization Basin #1 (South Pond) and the Aerated Stabilization Basin #2 (North Pond). From the secondary treatment, the water flows to the polishing/settling pond (Johnson Lake) and is finally discharged to the Arkansas River. In addition to the main WWTS, condensate from the Main Foul Condensate Tank is hard piped to a segregated zone as part of the facility's Clean Condensate Alternative (CCA) treatment plan used in lieu of controlling HVLC gases. In the segregated zone, the condensate is treated with phosphoric acid and bacteria in order to reduce the hazardous air pollutants (HAPs) released from the condensate.

Section II – OBSERVATIONS

On January 14, 2020 after I, Justin Chen, 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 Subparts S, MM, and DDDDD. After discussions about safety, scheduling, photographs, and confidential business information (CBI), Mr. Kevin Kidder gave an introduction to Evergreen and the Pine Bluff Mill. The records requested on January 6, 2020 (Appendix 4, Document Request) were provided to us during the meeting, except for the original Notification of Compliance Status. According to Ms. Julie Brimer, the facility was unable to locate the document due to its age.

Next, Dr. Frey and I discussed process details of the pulping area with Mr. Otis Hill. We discussed the process flow diagrams provided, detailing the pulping, bleaching, and storage of hardwood and softwood, prior to papermaking. Dr. Frey asked when the brown stock washers were constructed. Mr. Al Henderson, pulp technical manager with approximately 52 years of experience joined the meeting and stated that the C-line was the original line constructed in 1958 and had its drums replaced in 2005. He described the B-line as installed in 1967 and had its drums replaced in 2005 and 2010. He described that the A-line was removed in 2000 and had stopped operating in the 1970s. We asked the staff about the bleaching operations. They stated that chlorine dioxide is the primary bleaching chemical for both bleach lines, B and C (for low density pulp and hardwood pulp respectively). Staff stated there is only one scrubber for the bleach plant pulping process and the last time it was out of operation was in the early 2000s. When the scrubber is down, production is halted. We asked about how often the capping valves (CV) of the digesters were inspected and were told that they are inspected annually and repaired as needed.

We then discussed the control of LVHC gases and were told that operators can decide when to send LVHC gases to Lime Kiln 1 (LK1) or Lime Kiln 2 (LK2) based upon Continuous Emission Monitoring System (CEMS) data of total reduced sulfur (TRS). The facility staff told us that NCGs are typically incinerated at LK1 and that the venturi scrubber for the lime kilns is monitored with CEMS that monitor oxygen (O₂) and TRS. Mr. Garry Butler then proceeded to explain the process for the No. 1 and No. 2 MEE sets. He described that the combined condensate is recycled to the brown stock washers and that clean condensate from the first body is sent to the power house. Mr. Butler further explained that NCGs collected in the surface condenser and hotwell join the header. He stated that the No. 2 MEE has two vertical surface condensers, its NCGs are routed to the lime kilns, and its condensate is recycled to the brown stock washers. Mr. Butler also stated that the four precipitator stack emissions are monitored for TRS, O₂, and opacity. Next, we discussed the Smelt Dissolving Tanks. Mr. Butler stated that each SDT has an emission stack monitored with Continuous Parametric Monitoring Systems (CPMS) for flow and pressure differential, and that the No. 2 SDT is controlled with a demister pad, while the other two SDTs are equipped with venturi scrubber systems. Mr. Butler then gave a brief overview of the white liquor process, explaining how the smelt was mixed with the white liquor to become green liquor. We then concluded the day and exited the facility at 5:00 PM.

On Wednesday, January 15, we arrived at the Mill at 8:00 AM. I asked about the ownership history of the facility and was told that International Paper owned the mill until Jan 31, 2007, after which it was purchased by Evergreen Packaging. Dr. Frey then requested the approved Alternative Monitoring Plan (AMP) for the Leak Detection and Repair (LDAR) program that allowed the facility to inspect monthly instead of every 30 days.

Mr. Will Huyck then gave a safety briefing and explained what personal protective equipment was required to tour the facility as well as phone contact information and likely hazards. After the safety briefing, we spoke to Torry Gannon of Environmental 360 (LDAR contractor) and Otis Hill about the LDAR drawings that were provided as part of the information request. After this discussion, we gathered the inspection team including me (Justin Chen), Sarah Frey, Gary Bortz (ADEQ), and John Northern (ADEQ). Facility staff including Will Huyck, Otis Hill, Julie Brimer, Al Henderson, and Torry Gannon attended the inspection tour.

The inspection team began a tour of the facility at 9:30AM. We first stopped at the Main Condensate Tank where we observed small leaks at the condensate header below LDAR components MV-10025 and MV-10023 (Photos 1-5). We then moved to the digester area, where we observed visual emissions from a gas line exiting the Number 1 Digester Capping Valve at the flange while the digester was cooking (Photo 6 and Video 1). We moved to the top floor to inspect the chip chute area, visual emissions were observed at the following digesters: Number 1 while it was actively cooking (Video 2), the Number 2 Digester, the Number 3 Digester while it was capped (Video 3), the Number 5 Digester while capped and cooking, the Number 6 Digester, the Number 7 Digester while cooking, the Number 9 Digester while cooking, the Number 10 digester while cooking, the Number 11 Digester while cooking (Photo 7), the Number 14 Digester while cooking, and the Number 15 Digester. We then walked down one floor to observe the capping valves below the digester chip chutes. We observed the Number 14 Digester CV leaking and observed visual emissions (Photo 8 and Video 4). We then viewed the top of the liquor storage tanks (Photo 9) and the C Blow Tank. We moved to the BHA, where I observed steam and visual emissions from a hole (Photo 10). We returned to the interior of the pulping area to inspect more of the digester CVs. We saw a water leak at the Number 11 Digester CV, and visual emissions at the NCG piping (Video 5). Dr. Frey observed visual emissions from the Number 9 Digester CV and a leak that was possibly condensate from the Number 10 Digester NCG exit line (Photo 12). Mr. Otis Hill said that the Number 10 Digester CV wasn't actively leaking from the NCG piping, but that the facility was waiting for a shutdown to clean off the leaked condensate. We then observed visual emissions from the Number 7 Digester CV, including an existing leak on its NCG piping. We then observed chips loading into the Number 5 Digester and saw an active liquid leak with past liquid staining on the NCG line. Mr. Hill stated that he was not sure how old the leak was and what its source was. I then moved towards the Number 4 Digester CV and my hydrogen sulfide (H₂S) monitor alarm went off at 5 parts per million (ppm). I also observed visual emissions coming from the CV (Photo 13 and Video 6). We then saw what were called the "gas off jugs", one of which was damaged and out of service (Photo 14). Mr. Hill stated that the equipment required further repair and that a leak was recently fixed. Next, we observed the Number 3 Digester CV loading chips and saw an active leak on the NCG line. We also saw visual emissions from the

Number 2 Digester CV. At 10:51AM, Dr. Frey's H₂S monitor alarm went off and displayed a concentration of 7ppm while we were on the CV floor.

We moved from the CV floor and saw the BHA overflow valve and piping from the BHA to BHRE 1st Effect including the piping from the pine off-gas section. Dr. Frey confirmed the LDAR components of the heat exchangers as we toured the area. She found that LDAR component T-1046 was connected to the pressure line and that release occurs if the pressure builds to greater than 5 pounds per square inch (psi). This pressure level was set so that rupture discs aren't broken according to Mr. Hill. He also stated that this system is computer controlled. Next, we saw the NCG cooler (referenced as the BHRE condenser in the facility's LDAR diagrams) and found that there was a valve on it that could discharge to atmosphere (Photo 15). Dr. Frey noted that a car seal may be needed for it. We then viewed the foul condensate tank next to the evaporator condensate tank and confirmed its LDAR components. Dr. Frey asked Mr. Huyck and Ms. Brimer how the EHS staff is notified when foul condensates bypass the WWTS and Ms. Brimer answered that she would provide a list of condensate bypasses. Next, we observed and inquired about a vent pipe labeled "Noncondensable Gas" that was routed directly to atmosphere (Photos 16-17). Dr. Frey requested documentation related to the vent pipe. We then viewed the Blow Tanks (A, B, and C) and noted that each blow tank has two pressure release valves (PRVs) that vent to atmosphere but are equipped with alarms to signal the control room. We were also told that Blow Tanks are inspected every 3 years and that the upcoming February outage would have one of the Blow Tanks inspected. As we inspected the Blow Tanks, we observed visual emissions from Blow Tanks C (Video 7) and B. We continued the tour and observed pulp and black liquor overflow on the ground. We were told by Mr. Otis Hill that the cleaned material would go to the process sewer and WWTS. We then viewed the Waste Stock Tank and the Primary Knotter. We saw an accumulation of water, pulp and black liquor on the ground around the knotter. We were told that the floor drains route to the Waste Stock Chest. We observed the "Noss" knotter for pine, and the B Line and C Line secondary knotters. We observed large amounts of vapors coming off the C Line secondary knotters as well as some liquid leaks. We then toured the Brown Stock Washer area, observing both the B-Line and C-Line. No H₂S monitor alarm went off while touring the area.

We continued our tour of the facility by viewing the Turpentine Recovery Area and confirmed its LDAR components. We then traced the NCG header to the Lime Kiln area. We first viewed the No. 1 Lime Kiln as the No. 2 Lime Kiln was down for the day because its lime feed chain needed repairs. The No. 1 Lime Kiln was receiving NCGs, and we were told that its CEMS was run by a contractor. We observed the control room for the lime kilns and saw the monitors for CEMS and rupture disk data. We discussed with the operators how they choose which lime kiln to send NCGs to.

Afterwards, we moved on towards the mechanical grinders and deckers area of the facility. After touring that section, we met again with Mr. Garry Butler to tour the Recovery Operations. We toured the eighth floor of the Recovery Operations and observed the MEEs. I observed a visual emission at the No. 2 MEE set in the piping between Body 1 and Body 2 (Photo 21). On floor 9, Mr. Butler pointed out a demister pad waiting to be cleaned (Photo 22). I observed liquid leaks from the No.2 MEE body 2 (Photo 23). We observed No. 2, No. 3, and No. 4 RBs. We next saw the No. 1 and No. 2 Evaporator Hotwells. We then

went into the control room and discussed CEMS operations with the system operator. Afterwards, we returned to the conference room of the office building and debriefed the facility staff, including Mill Manager Mark Hauke, and concluded the day at approximately 4:45PM.

We returned to the facility at 8:00AM the following day (1/16/2020). As we approached the facility, there was a noticeable green smoke plume from the Bleach Plant scrubber stack (Photo 24). We made entry at 8:15AM and met with Ms. Julie Brimer. We asked her about the green plume. She stated that it was abnormal and that the bleach plant may be having an unanticipated shut down. We received clarification from Mr. Will Huyck and Mr. Otis Hill that the B Line of the Bleach Plant was up, and that the C-Line was down.

We then interviewed Mr. Mickey Debose, Project Engineer for the Pulp Mill since 1993. We discussed the inspection and repair program at the Pulp Mill. He told us that inspections of the blow tanks were conducted every 3 years and that leaks mostly occur at the target plate and roof. He stated that ultrasonic thickness readings are conducted on the shell and top and that PRVs are repaired, but that there is no computer monitoring of valve leaks. He stated that inspections were conducted on Blow Tanks A and B last year, and that B was inspected a year early because leaks were observed. Mr. Debose stated that Blow Tank C's inspection will be conducted near the end of 2020. Dr. Frey asked how he would notify the EHS staff if he observed a leak during his routine work. He stated that no notification is given to the EHS staff from maintenance, but that he keeps Pulping Operations staff informed. Mr. Debose then discussed the inspection and repair protocol for digesters, stating that each digester is inspected annually during March, where they are taken out of service for a week. He stated that the CV of a digester is removed, and the thickness of the shell is evaluated using ultrasonic thickness measurement. He then stated that the flange of the digester is machined to remove build up and that the CVs don't typically have major issues. When CVs are found with repair issues, they will send them out for rebuilding, one at a time because there is only one extra CV to be placed into operational rotation. Mr. Debose then discussed the process for inspecting the lime kilns, stating that they are inspected annually which includes shutting the kiln down, then inspecting the thickness of the bricks and lining. He also stated that he doesn't have the responsibility to check the NCG input line for the lime kilns but will notify operators if something out of the ordinary is observed.

After we concluded our interview with Mr. Debose, we were informed by facility staff that there had been an upset condition at the Bleach Plant overnight, causing chlorine dioxide to be emitted from the scrubber stack, which resulted in the green smoke plume. We entered the Bleach Plant and first looked at the B Line washers. We first observed the 3B Bleach Plant Washer and saw leaks from the flange (Photos 25-26). We then moved outside to see the 3B Bleach Plant Tower and observed a pulp spill on the ground (Photo 27). We moved on to the 4B Bleach Plant tower and observed visual emissions from corroded piping (Photo 28). We returned to the interior of the building and saw the rear of the 3B Bleach Plant Washer, where we observed leaking liquid (Photo 29) as well as an open window releasing light visual emissions (Photo 30). Dr. Frey saw a major shower washer leak from deteriorating pipes and observed that the 4B Bleach Plant Washer was not under heavy vacuum as lots of steam was leaving the washer body from its doors, hood, and windows. We looked at the 5B Bleach Plant Washer and found

multiple liquid leaks located on its back side (Photo 31), from a corroded discharge pipe (Photo 32), and from its front (Video 8). We also saw significant damage to the roof of the 5B Bleach Plant Washer body (Photo 33). Dr. Frey observed vapors out of every door and hole in the body of the 4B Bleach Plant Washer. We then saw the bypassed and decommissioned 6B Bleach Plant Washer. Next, we saw the 7B Bleach Plant Washer where some visual emissions were observed as the washer hood was not entirely enclosed. We then moved to the C-Line, which was not in operation at the time. At the 1C Bleach Plant Washer, I saw a liquid leak on the backside of the washer (Photo 34). We observed similar evidence of liquid leaks at the 3C and 4C Bleach Plant Washers. We moved outside to see more of the Bleach Plant Towers and saw that 1C Bleach Plant Tower had significant buildup of material on its vessel body. We then saw a large visible emission leak from the 7B Bleach Plant Tower at the flange and connecting pipe (Video 9). We moved to the top of the 3B Bleach Plant Tower and saw an open hole at the top of the tower (Photo 35) that was releasing visible emissions. We moved to the seal pit area of the Bleach Plant and observed a large water leak from the 7B Seal Pit. We next observed visual emissions from a leak on the 1B Seal Pit (Video 10). Dr. Frey observed large amounts of visual emissions from the 4B Seal Pit and could not confirm the status of multiple LDAR components because the view was obstructed by the emissions coming from the 4B Seal Pit.

After exiting the Bleach Plant area, we met with the CEMS contractor Kelley Jones of Maverick Technologies to do a tour of the CEMS monitoring systems. We first visited the H₂S monitoring station for the No. 2 and No. 3 RB, and the expiration date for the nitrogen base tank was July 23, 2022. Next, we visited the H₂S monitoring station for the No. 1 and No. 2 LK, and the expiration date for the nitrogen base tank was March 22, 2022. We then interviewed Mr. Jones and found that he has been working at the facility since 1994. He stated that his responsibilities include 10 monitoring systems in total, and that he conducts inspection rounds daily where he checks system calibration and notifies operations about levels, maintenance, and cylinder gas audits. He also said that he is responsible for weekly, monthly, semi-annual, and annual maintenance. He said that there is about 10 hours per quarter of CEMS downtime per system, and he informs the EHS department of it. He stated that he prepares the CEMS reports that are given to Ms. Brimer. I requested the CEMS and CPMS data for the Bleach Plant Scrubber during the time the upset conditions began at the Bleach Plant.

We next met with James Ellison, EHS Engineer 2, who has 46 years of experience at the facility. We were told that he manages the WWTS. Dr. Frey, Will Huyck, James Ellison, and I went on a tour of the WWTS. We were told that there was a 2007 WWTS upgrade that increased the number of zones from 14 to 22 in 2007. This was when the CCA was implemented. When the WWTS was upgraded, the condensate hard pipe was extended to the new Segregated Zone (Photo 36). We observed the Primary Clarifier and were told it was going to be rebuilt in June 2020. The facility staff told us that the sludge collected was burned in the Bark Boiler. We moved from the clarifier to Johnson Lake, also known as Oxbow Lake, where we saw seven aerators used for polishing. Next, we saw the two Ash Settling Basins (ASB) and were shown the ten mixer aerators (also known as Raptors) in the first ASB, which the staff called the South Pond. We were shown the 13 aerators in the second ASB, which staff called the North Pond. We were told that both ASBs are considered secondary treatment. Staff stated that the residence time is approximately 1.5 days in the first ASB, 2 days in second ASB, and 4 days in Johnson Lake. We

were told that additives are only added in the Segregated Zone. We saw at the entrance of ASB 2 the aerator with its blower out, and Mr. James Ellison told us that the agitator was still running. I took a photo of the hard pipe prior to discharging into the Segregated Zone (Photo 37). We were told that phosphoric acid and bacteria are added to the Segregated Zone. We observed the three lines which discharge condensate under the surface of the segregated zone, one for each row in it (Photo 38). We then observed the Segregated Zone outlet flowing into ASB 1. I took a photo of a water sampling point at the Segregated Zone (Photo 39). We concluded the WWTS tour and broke for lunch at 12:00PM

Returning from lunch, the EPA inspection team conducted document review. I reviewed CEMS data for the Bleach Plant Scrubber system, and Dr. Frey reviewed the Toxic Reporting Inventory (TRI) Methanol submission. I found that the CEMS data during the upset conditions did not vary much from non-upset conditions as the recirculation rate, pH, and the fan circulation rate stayed consistent. While I was reviewing CEMS data, Mr. Huyck used piping and instrumentation diagrams (P&IDs) to explain to Dr. Frey that the unknown NCG vent that we observed near the precooler pump is related to the 2 stage sewer system. He noted that pulping condensates that are not collected elsewhere are sent to the WWTS by the sewer, where NCGs from the condensate is routed to the precooler pump, then to the NCG header for incineration. He stated that there is a water seal which prevents NCGs from releasing to atmosphere from the unknown NCG vent. Dr. Frey asked Mr. Huyck how anyone would know if the water seal was broken, to which he replied that they could only know by observing visible emissions released from the pipe. He then described that when the Main Foul Condensate Tank overflows, it lasts for 3 minutes on average per overflow event, the liquids are sent to the sewer, and NCGs are routed back to the precooler pump. Dr. Frey asked Mr. Huyck how this would affect pulping condensate sample collection valves given that samples are collected from the tank prior to an overflow event occurring. Mr. Huyck stated he would find more information on this issue and Ms. Brimer stated that she believed that the overflow does not go to the sewer. Dr. Frey noted that, according to the Title V Permit, the facility collects foul condensate for sampling from the Blow Heat Accumulator, the Pre-Evaporator Foul Condensate Tank, and at the Turpentine Decanter Underflow Storage Tank, and that these sample results are used to meet the 11.1 pounds per oven dried tons of pulp (ODTP) collection requirement of the permit. Dr. Frey also noted that the permit states that additional condensates collected for CCA validation are from the Pre-Evaporator Combined Condensate Tank and MEE sources. It was later noted by Will Huyck, Otis Hill, and Garry Butler that these two condensate collection points were no longer accurate. I debriefed the facility staff on the activities of the day, requested the Bleach Plant Scrubber's performance test and clarification on date headers from the CEMS files, and then exited the facility for the day at 4:30PM.

We returned to the facility on January 17, 2020 at 8:55AM to go over questions about observations made during the inspection tour with the facility staff and conducted an exit briefing which covered areas of concern. We discussed with facility staff the Bleach Plant Scrubber's operational parameters and emissions calculations. Dr. Frey shared that the permit's Specific Condition 247 states that blow tanks have water seals for bypass controls, but Mr. Huyck stated that this was not accurate. Mr. Huyck also stated that the formerly unidentified NCG line was identified as the Sealed Sewer Vent Line at the south east corner of the Blow Heat Recovery area, and that it vents to the atmosphere with no bypass

control. I conducted the exit briefing to facility staff at 9:40AM and concluded it at 10:05AM. Afterwards, Dr. Frey and I discussed some unaddressed questions and final document requests with facility environmental staff. We exited the facility at 11:15AM

Section III – AREAS OF CONCERN

During the closing conference, Mr. Chen 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 video taken with the facility's environmental staff. The Mill made no claims of confidential business information regarding the photographs, videos, or documents provided.

1) The inspection team observed visible emissions at thirteen out of the fourteen CVs of the digesters, and H₂S monitors carried by both EPA inspectors alarmed at 5ppm and 7ppm detection when touring the area. Per §63.443(a)(1)(i), the total HAP emissions from each LVHC system, which includes digesters, must be controlled. The March 31, 2000 EPA guidance document titled "Questions and Answers for the Pulp and Paper NESHAP, Second Volume" clarifies that it is not required to control emissions from batch digesters during uncapping processes, however emissions should not be present during the cooking process.

2) Visible emissions, defects, or indicators of historical leaks such as stained vessel bodies were observed by the inspection team. A comprehensive list is included as Appendix 6.

- Per §63.443(c) for kraft, soda, and semi-chemical processes, 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.
- per §63.445(b) for bleaching systems, specified equipment must be enclosed and vented into a closed-vent system and routed to a control device to prevent the release of chlorinated HAPs to the atmosphere.

3) When reviewing LDAR monthly inspection records, missing car seals were observed in the pulping area, an example of which includes the bypass at the BHRE Condenser/NCG cooler (Photo 15).

4) When investigating the sewer NCG bypass near the NCG Pre-Cooler Pump, it was observed that the bypass didn't have a flow indicator, thus having no indication that it has flow through it.

5) The inspection team found that when the Main Foul Condensate Tank overflows, liquids are sent to the sewer and NCGs are routed back to the precooler pump. This would potentially bypass the sample point used to determine compliance of condensate control and route straight to the WWTS, meaning that samples taken would not be representative of condensate sent to the WWTS. Per §63.457(c)(1)(i), samples are to be taken from an enclosed pipe prior to the liquid stream being exposed to the atmosphere.

6) When investigating the permit requirements for the CCA, some condensate collection options listed in the permit are not applicable.

7) On January 16, 2020, the inspection team observed emissions from the Bleach Plant's scrubber stack. It is unknown how the facility ensures that permitted hourly emission limits of chlorinated HAPs are not exceeded. In a follow up email dated February 10, 2020, Julie Brimer stated that the observed emissions from the stack was a result of upset conditions in the Bleach Plant. It is unknown whether Start Up, Shut Down, and Malfunction (SSM) Plan and associated procedures were followed in order to minimize emissions as required by §63.6(e).

Section IV – FOLLOW UP

The following information was received in follow up emails by EPA after exiting the Facility on Friday, January 17, 2020:

The mill stated that carbon monoxide and chlorine dioxide emission factors used for emission calculations were based upon site specific testing data. Other volatile organic compounds and HAP pollutants factors were from the National Council for Air and Stream Improvement (NCASI) Pulp and Paper Emission Factor Database for Bleach Plants with Elemental Chlorine Free (ECF) operations.

The mill sent a description of what likely caused the observed green smoke from the Bleach Plant Scrubber. A timeline of events resulting in upset conditions at the Bleach Plant was provided.

Section V – LIST OF APPENDICES

- Appendix 1 – Photo Log – 40 photos taken
- Appendix 2 – Video Log – 10 videos taken
- Appendix 3 – Opening conference sign-in sheet
- Appendix 4 – Document Request List
- Appendix 5 – Closing conference sign-in sheet
- Appendix 6 – List of Non-Digester Visible Emissions During Inspection

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0407.JPG	Photo Date:	01/15/2020	Time:	09:32:57
Photographer:	Justin Chen				
Description:	Wastewater Treatment System sample point at Main Condensate Tank.				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location:	Evergreen Packaging, Inc. Pine Bluff Mill				☐ Image Modified	
City:	Pine Bluff	Jefferson County			State:	AR
Filename:	DSCN0408.JPG		Photo Date:	01/15/2020	Time:	09:34:39
Photographer:	Justin Chen					
Description:	Wastewater Treatment System sample point at Main Condensate Tank.					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0409.JPG	Photo Date:	01/15/2020	Time:	09:36:14
Photographer:	Justin Chen				
Description:	Wastewater Treatment System Main Condensate Tank Header.				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County			State: AR
Filename:	DSCN0410.JPG	Photo Date:	01/15/2020	Time:	09:38:35
Photographer:	Justin Chen				
Description:	Leaks at Main Condensate Tank Header.				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County			State: AR
Filename:	DSCN0411.JPG	Photo Date:	01/15/2020	Time:	09:41:43
Photographer:	Justin Chen				
Description:	Main Condensate Tank.				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0417.JPG	Photo Date:	01/15/2020	Time:	09:49:22
Photographer:	Justin Chen				
Description:	Visual emissions leak at Digester 1 capping valve piping.				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location:	Evergreen Packaging, Inc. Pine Bluff Mill				☐ Image Modified	
City:	Pine Bluff	Jefferson County			State:	AR
Filename:	DSCN0420.JPG		Photo Date:	01/15/2020	Time:	09:57:11
Photographer:	Justin Chen					
Description:	Top of Digester 11 visual emissions leak during cook.					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0422.JPG	Photo Date:	01/15/2020	Time:	10:03:37
Photographer:	Justin Chen				
Description:	Digester 14 capping valve leak.				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County			State: AR
Filename:	DSCN0423.JPG	Photo Date:	01/15/2020	Time:	10:06:37
Photographer:	Justin Chen				
Description:	Top of liquor storage tanks.				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County			State: AR
Filename:	DSCN0424.JPG	Photo Date:	01/15/2020	Time:	10:11:18
Photographer:	Justin Chen				
Description:	Visual emissions released from Blow Heat Accumulator.				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0425.JPG	Photo Date:	01/15/2020	Time:	10:13:35
Photographer:	Justin Chen				
Description:	Long distance view of Wastewater Treatment System.				



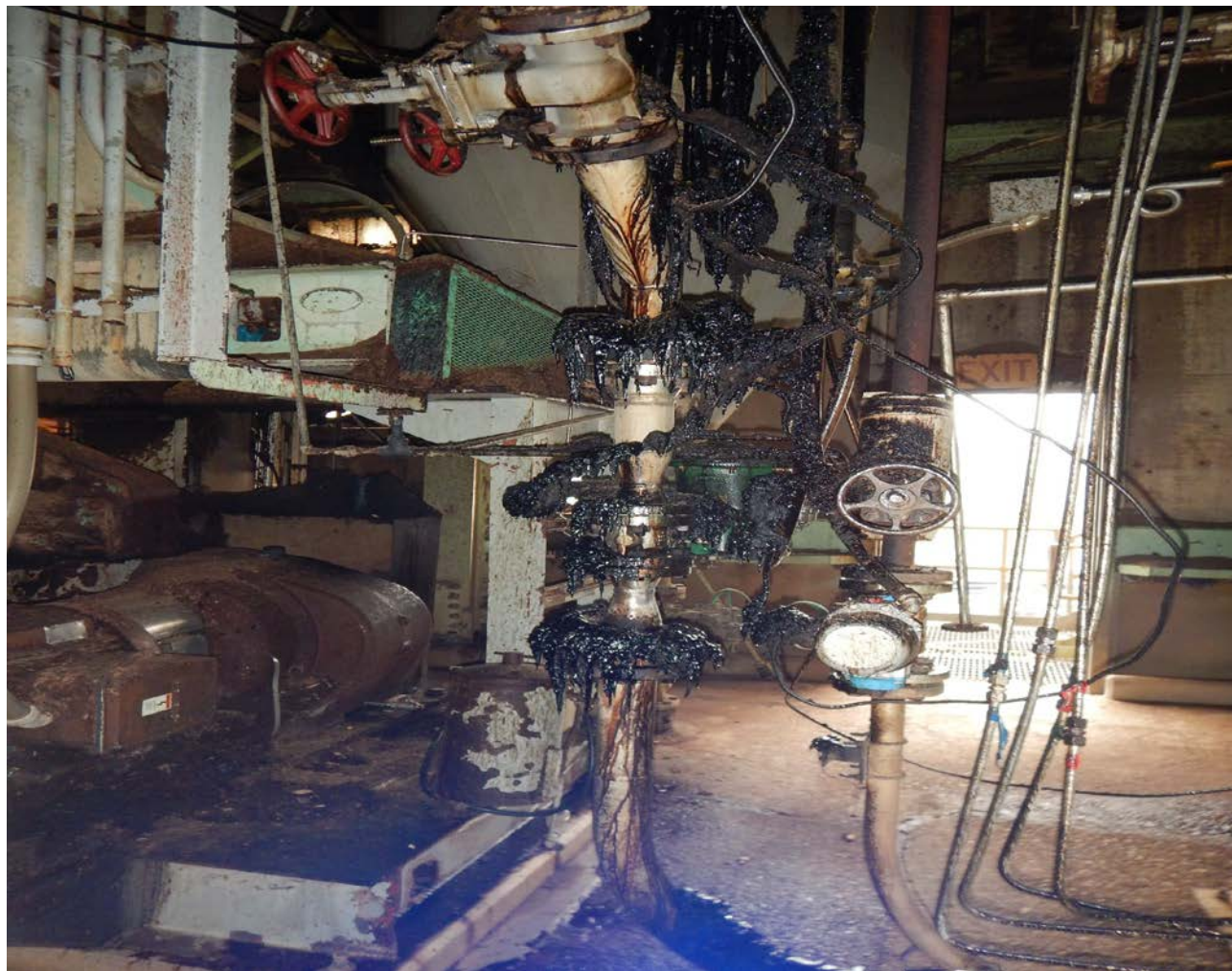


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County			State: AR
Filename:	DSCN0427.JPG	Photo Date:	01/15/2020	Time:	10:25:44
Photographer:	Justin Chen				
Description:	Digester 10 non-condensable gas line with buildup of condensate.				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0428.JPG	Photo Date:	01/15/2020	Time:	10:35:29
Photographer:	Justin Chen				
Description:	Digester 4 missing bolt leaking visual emissions.				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0430.JPG	Photo Date:	01/15/2020	Time:	10:40:27
Photographer:	Justin Chen				
Description:	Gas off jug/separator (out of service).				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County			State: AR
Filename:	DSCN0431.JPG	Photo Date:	01/15/2020	Time:	11:21:26
Photographer:	Justin Chen				
Description:	Potential bypass at blow heat accumulator precooler.				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location:	Evergreen Packaging, Inc. Pine Bluff Mill				☐ Image Modified	
City:	Pine Bluff	Jefferson County			State:	AR
Filename:	DSCN0432.JPG		Photo Date:	01/15/2020	Time:	11:40:02
Photographer:	Justin Chen					
Description:	Unknown line labeled "noncondensable gas" at base near foul condensate tank.					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location:	Evergreen Packaging, Inc. Pine Bluff Mill				☐ Image Modified	
City:	Pine Bluff	Jefferson County			State:	AR
Filename:	DSCN0433.JPG		Photo Date:	01/15/2020	Time:	11:40:09
Photographer:	Justin Chen					
Description:	Unknown line labeled "noncondensable gas" with open end to atmosphere.					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0435.JPG	Photo Date:	01/15/2020	Time:	12:11:37
Photographer:	Justin Chen				
Description:	Brown Stock Washer 4.				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County			State: AR
Filename:	DSCN0436.JPG	Photo Date:	01/15/2020	Time:	12:13:56
Photographer:	Justin Chen				
Description:	Steaming from gas tanks in power/recovery area.				



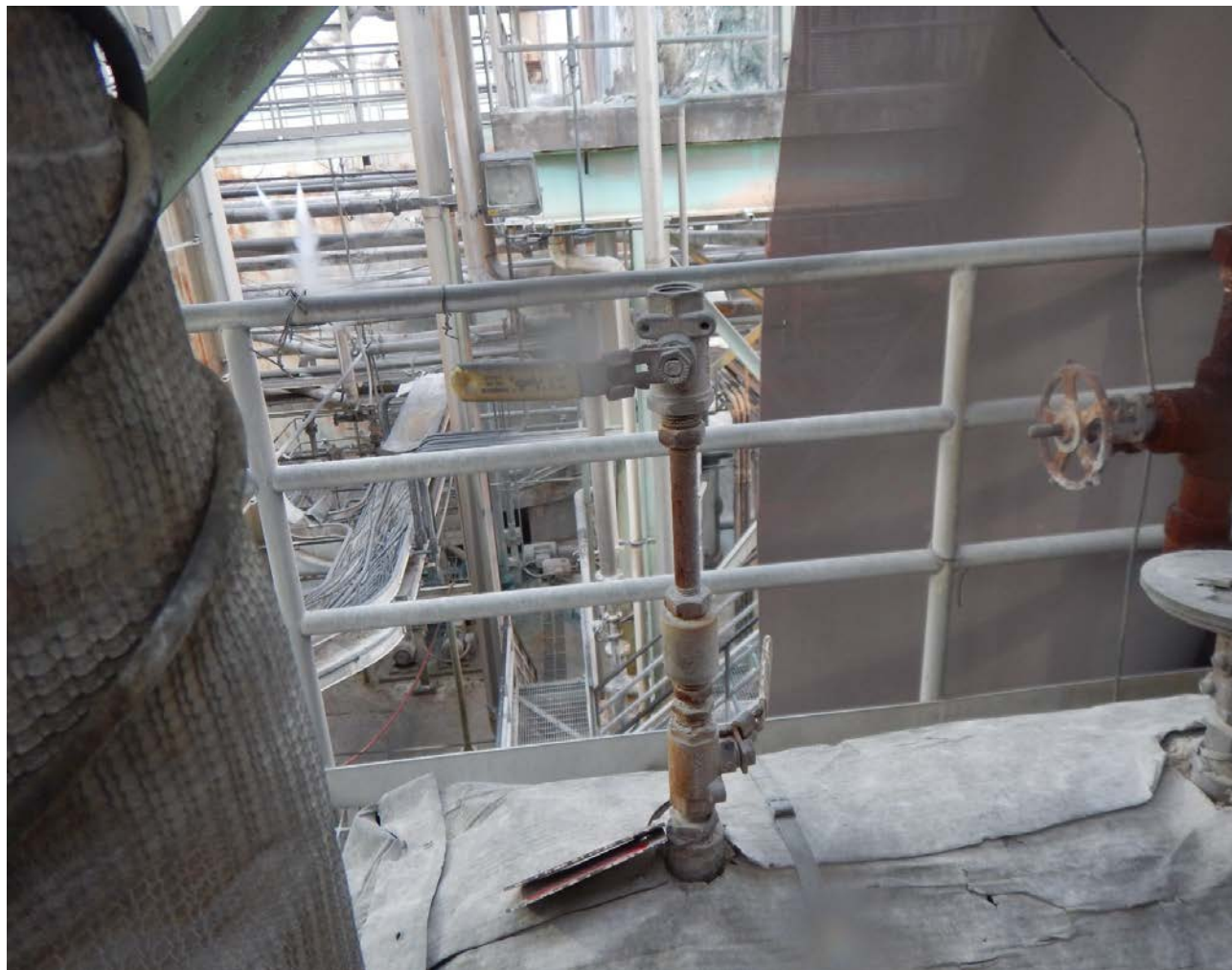


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County			State: AR
Filename:	DSCN0437.JPG	Photo Date:	01/15/2020	Time:	14:20:30
Photographer:	Justin Chen				
Description:	Missing car seal on T-7007.				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0438.JPG	Photo Date:	01/15/2020	Time:	15:21:43
Photographer:	Justin Chen				
Description:	Visual emissions at the No. 2 Multiple Effect Evaporator set in the piping between Body 1 and Body 2.				



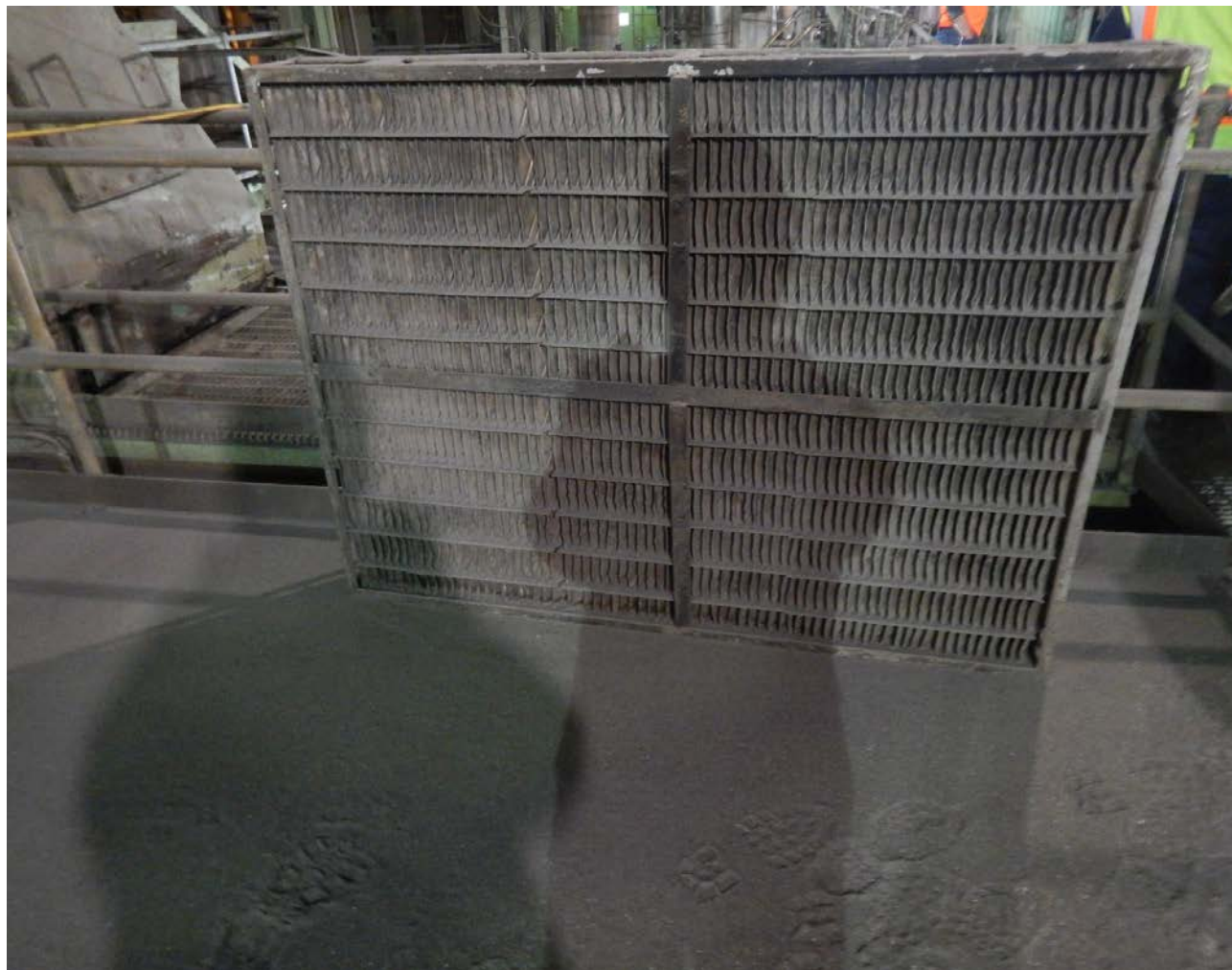


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0439.JPG	Photo Date:	01/15/2020	Time:	15:26:48
Photographer:	Justin Chen				
Description:	Demister pad waiting to be cleaned.				



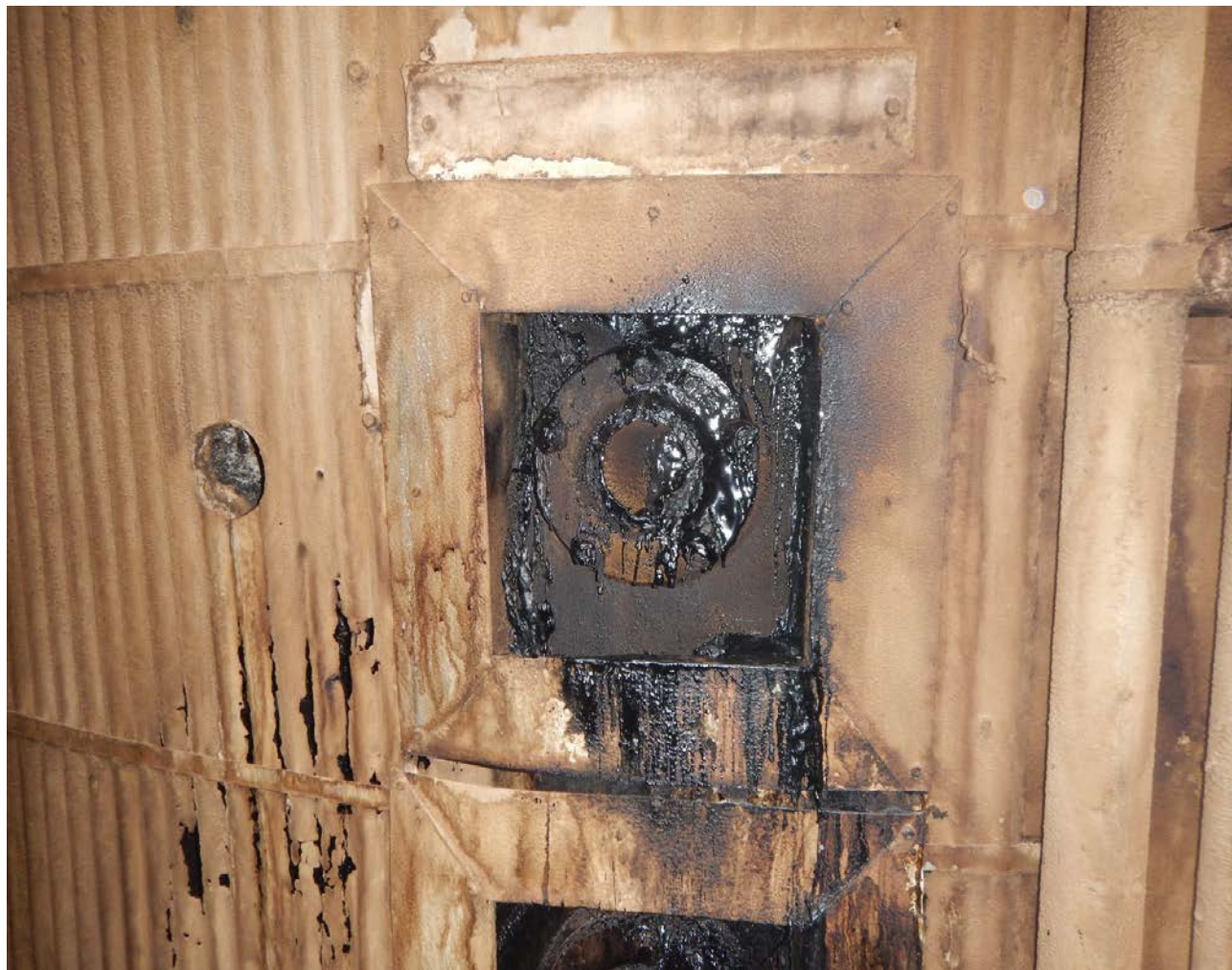


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0440.JPG	Photo Date:	01/15/2020	Time:	15:32:08
Photographer:	Justin Chen				
Description:	Liquid leaks from the No.2 Multiple Effect Evaporator Body 2.				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0441.JPG	Photo Date:	1/16/2020	Time:	08:06:08
Photographer:	Justin Chen				
Description:	Green smoke released from Bleach Plant Scrubber Stack.				



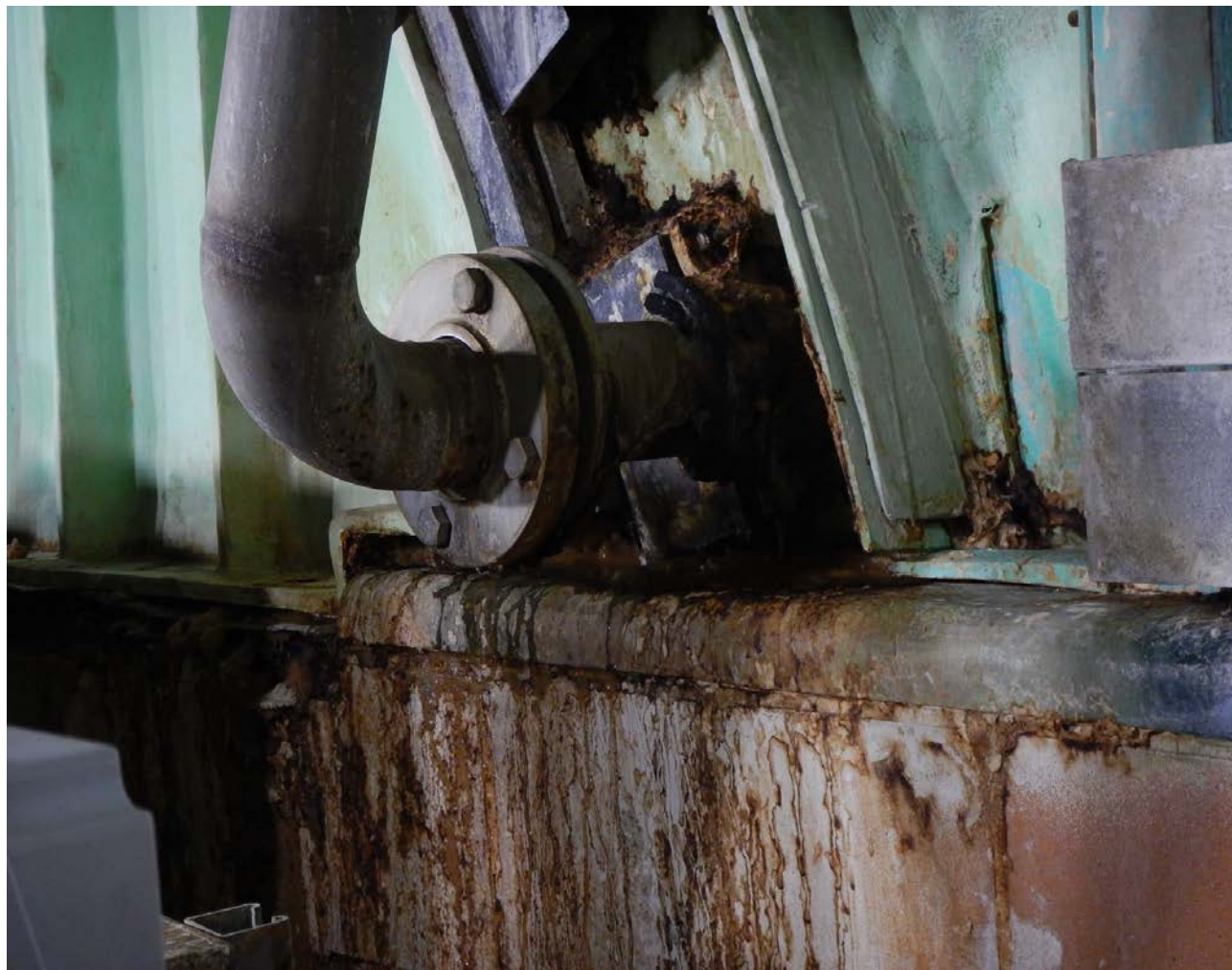


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

Location:	Evergreen Packaging, Inc. Pine Bluff Mill				☐ Image Modified	
City:	Pine Bluff	Jefferson County			State:	AR
Filename:	DSCN0442.JPG		Photo Date:	01/16/2020	Time:	09:08:19
Photographer:	Justin Chen					
Description:	Front Side liquid leak from 3B Washer Vat at Bleach Plant.					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 26

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0443.JPG	Photo Date:	01/16/2020	Time:	09:09:40
Photographer:	Justin Chen				
Description:	Front Side liquid leak from 3B Washer Vat at Bleach Plant.				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 27

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0444.JPG	Photo Date:	01/16/2020	Time:	09:10:00
Photographer:	Justin Chen				
Description:	3B Tower pulp spill.				



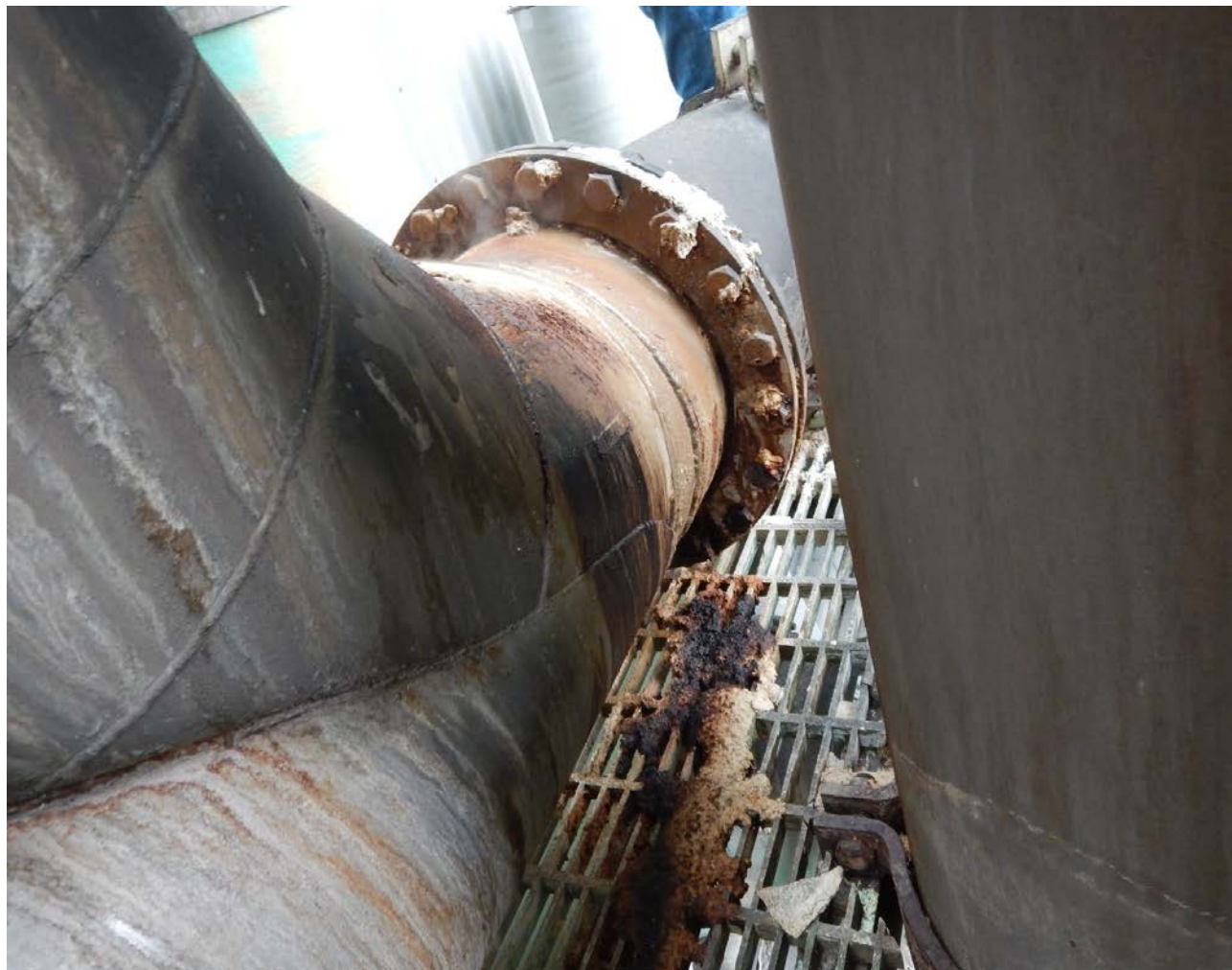


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 28

Location:	Evergreen Packaging, Inc. Pine Bluff Mill				☐ Image Modified	
City:	Pine Bluff	Jefferson County			State:	AR
Filename:	DSCN0445.JPG		Photo Date:	01/16/2020	Time:	09:13:17
Photographer:	Justin Chen					
Description:	Exit piping from 4B Tower with visual emissions.					



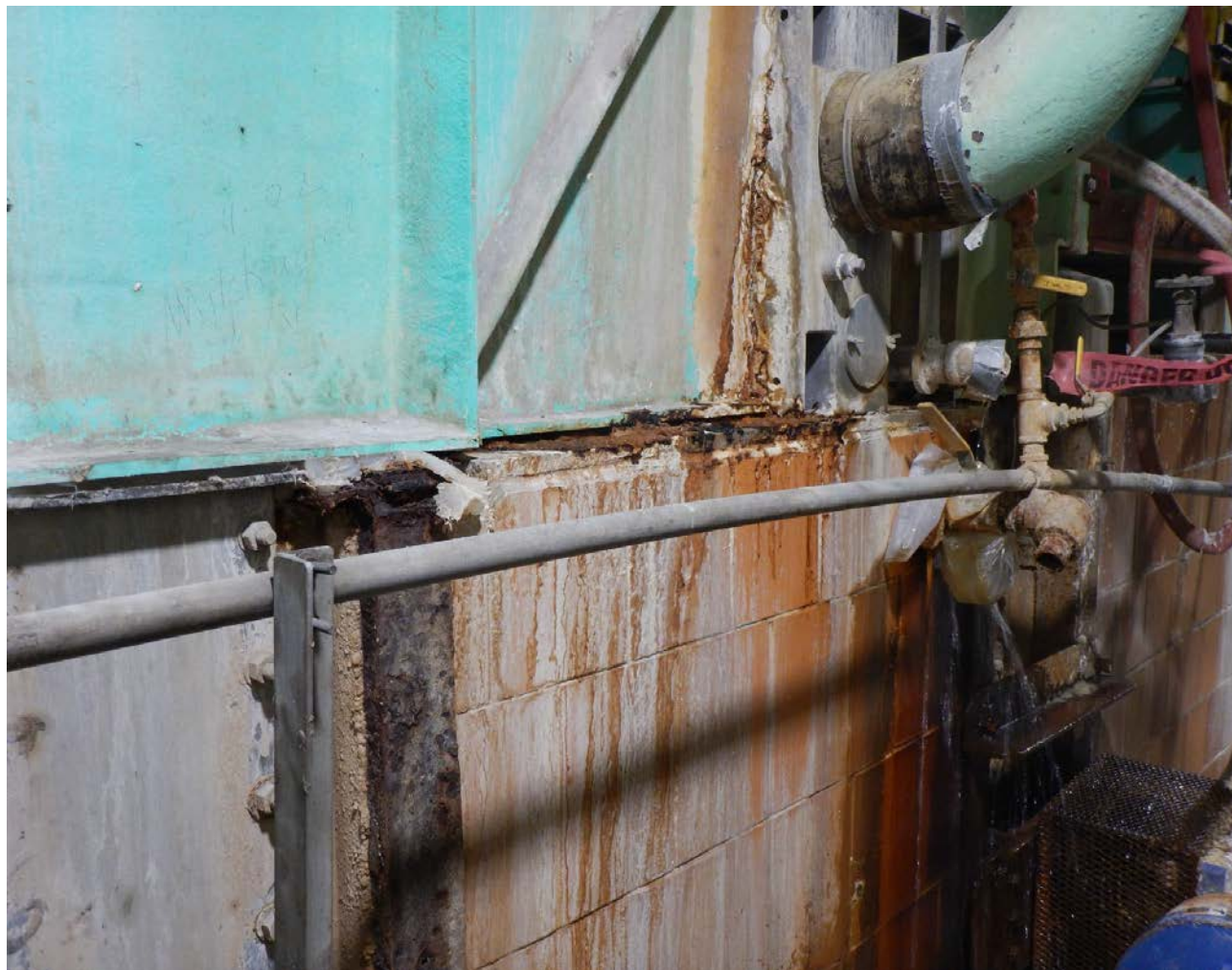


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 29

Location:	Evergreen Packaging, Inc. Pine Bluff Mill				☐ Image Modified	
City:	Pine Bluff	Jefferson County			State:	AR
Filename:	DSCN0446.JPG		Photo Date:	01/16/2020	Time:	09:15:41
Photographer:	Justin Chen					
Description:	Backside liquid leak from 3B Washer.					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 30

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0447.JPG	Photo Date:	01/16/2020	Time:	09:16:41
Photographer:	Justin Chen				
Description:	Open window on the 3B Washer.				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 31

Location:	Evergreen Packaging, Inc. Pine Bluff Mill					☐ Image Modified	
City:	Pine Bluff	Jefferson County				State:	AR
Filename:	DSCN0448.JPG			Photo Date:	01/16/2020	Time:	09:22:35
Photographer:	Justin Chen						
Description:	5B Washer liquid leak on backside.						



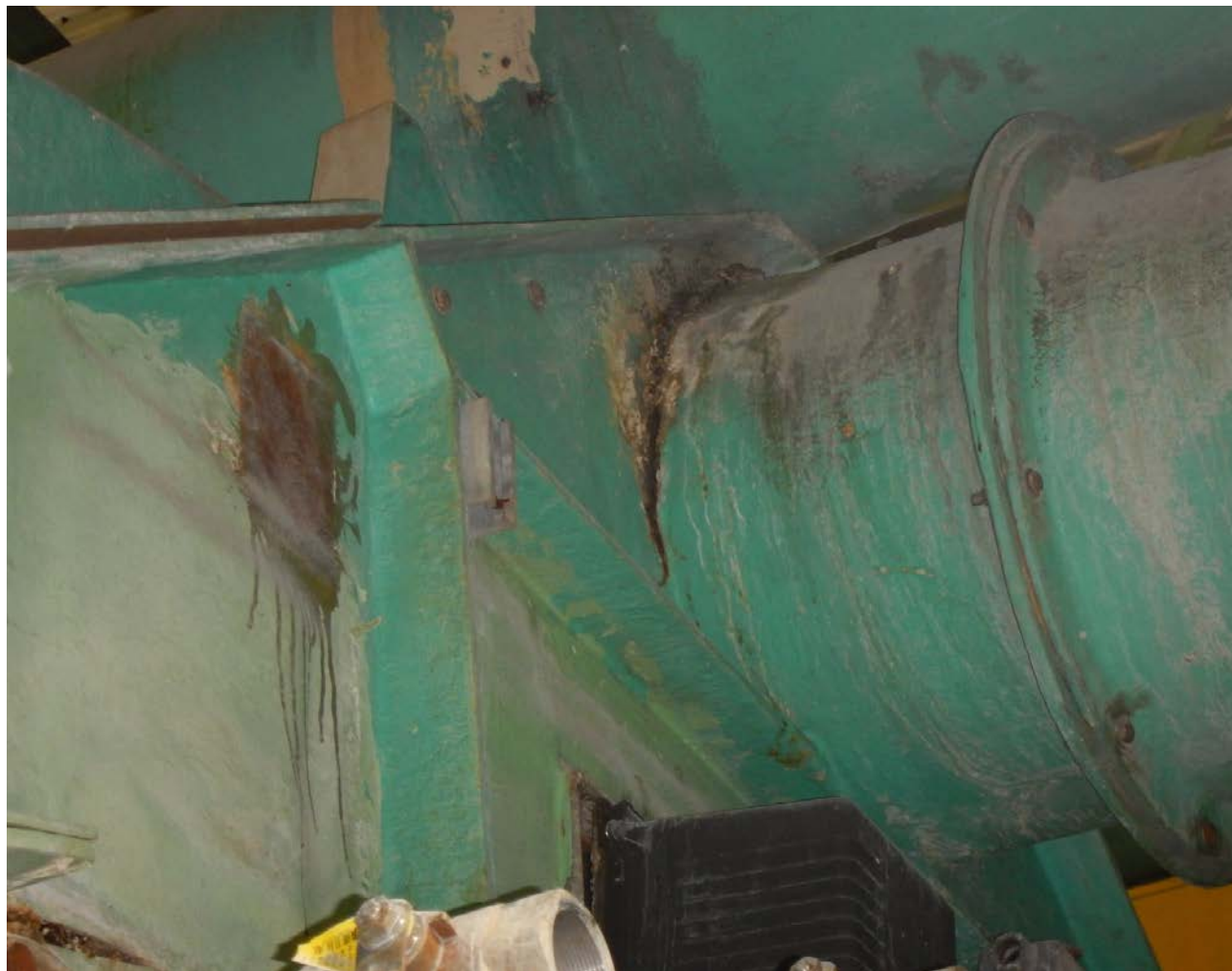


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 32

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0449.JPG	Photo Date:	01/16/2020	Time:	09:23:38
Photographer:	Justin Chen				
Description:	5B Washer discharge pipe corrosion.				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 33

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0451.JPG	Photo Date:	01/16/2020	Time:	09:27:29
Photographer:	Justin Chen				
Description:	5B Washer collapsing shell.				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 34

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0452.JPG	Photo Date:	01/16/2020	Time:	09:42:34
Photographer:	Justin Chen				
Description:	1C Washer backside liquid leak.				



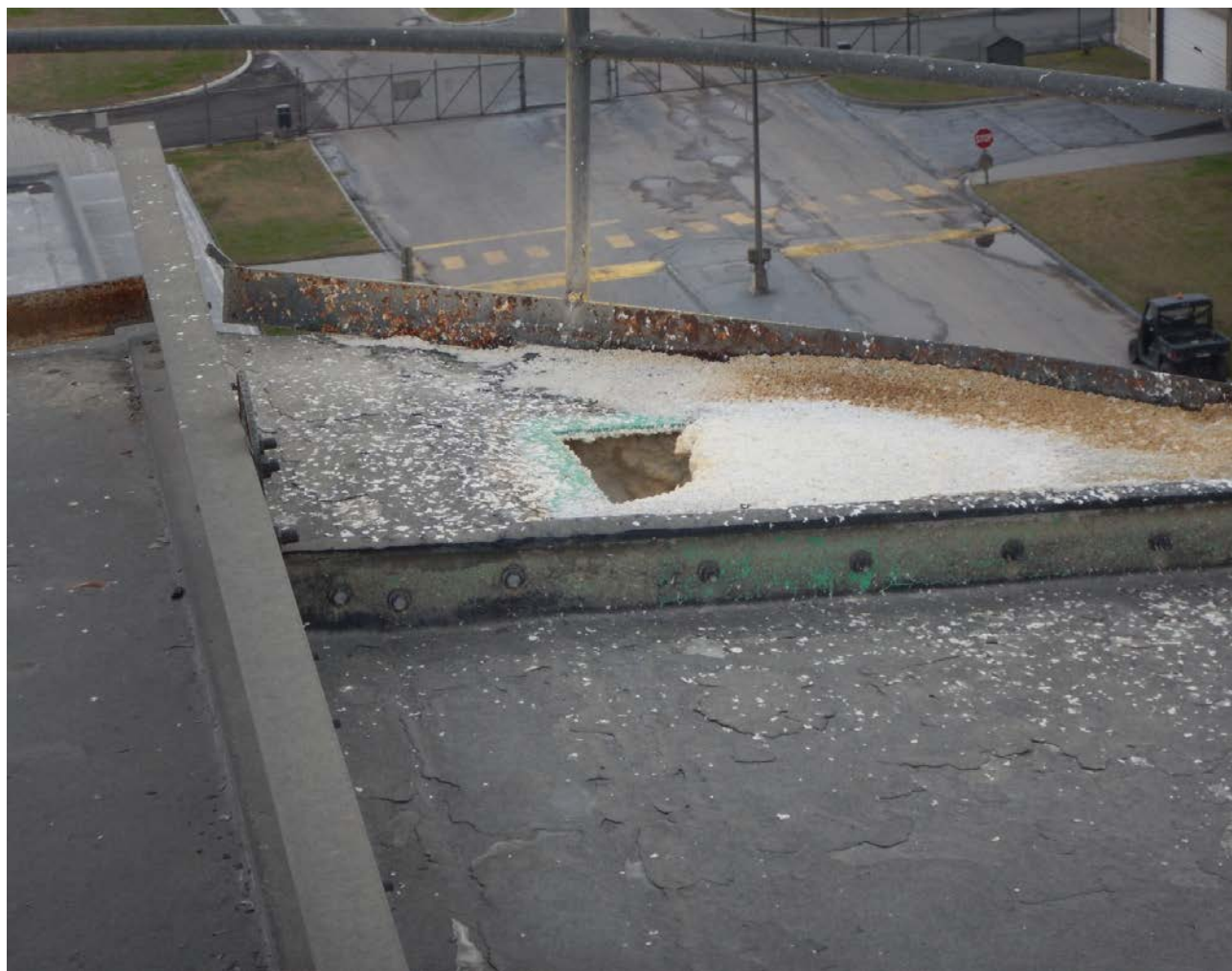


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 35

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County			State: AR
Filename:	DSCN0454.JPG	Photo Date:	01/16/2020	Time:	10:06:47
Photographer:	Justin Chen				
Description:	Open hole with pulp on top of 3B Bleach Plant tower.				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 36

Location:	Evergreen Packaging, Inc. Pine Bluff Mill				☐ Image Modified	
City:	Pine Bluff	Jefferson County			State:	AR
Filename:	DSCN0456.JPG		Photo Date:	01/16/2020	Time:	11:36:21
Photographer:	Justin Chen					
Description:	Condensate hard pipe to the Wastewater Treatment System Segregated Zone.					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 37

Location:	Evergreen Packaging, Inc. Pine Bluff Mill				☐ Image Modified	
City:	Pine Bluff	Jefferson County			State:	AR
Filename:	DSCN0457.JPG		Photo Date:	01/16/2020	Time:	11:42:25
Photographer:	Justin Chen					
Description:	Condensate hard pipe prior to discharge to segregated zone.					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 38

Location:	Evergreen Packaging, Inc. Pine Bluff Mill				☐ Image Modified	
City:	Pine Bluff	Jefferson County			State:	AR
Filename:	DSCN0458.JPG		Photo Date:	01/16/2020	Time:	11:42:38
Photographer:	Justin Chen					
Description:	Condensate hardpipe discharging to Segregated Zone of Wastewater Treatment System.					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 39

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County			State: AR
Filename:	DSCN0459.JPG	Photo Date:	01/16/2020	Time:	11:48:15
Photographer:	Justin Chen				
Description:	Segregated Zone Sample Station 2.				



Appendix 2

Video Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Video No. 1

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0416.MOV	Video Date:	01/15/2020	Time:	09:50
Videographer:	Justin Chen				
Description:	Visual Emissions Leak from Digester 1 capping valve piping.				
URL:	https://youtu.be/ZyyLctMhmWA				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Video No. 2

Location:	Evergreen Packaging, Inc. Pine Bluff Mill				☐ Image Modified	
City:	Pine Bluff	Jefferson County			State:	AR
Filename:	DSCN0418.MOV	Video Date:	01/15/2020	Time:	09:51	
Videographer:	Justin Chen					
Description:	Top of Digester 1 visual emissions leak during cook.					
URL:	https://youtu.be/uLR_d661pV0					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Video No. 3

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0419.MOV	Video Date:	01/15/2020	Time:	09:54
Videographer:	Justin Chen				
Description:	Top of Digester 3 visual emissions leak while capped.				
URL:	https://youtu.be/QH-0bXJBVY				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Video No. 4

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0421.MOV	Video Date:	01/15/2020	Time:	10:02
Videographer:	Justin Chen				
Description:	Digester 14 capping valve leak.				
URL:	https://youtu.be/oyxS8NEdi7k				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Video No. 5

Location:	Evergreen Packaging, Inc. Pine Bluff Mill				☐ Image Modified	
City:	Pine Bluff	Jefferson County			State:	AR
Filename:	DSCN0426.MOV		Video Date:	01/15/2020	Time:	10:24
Videographer:	Justin Chen					
Description:	Flange leak on NCG Line piping on Digester 11 capping valve.					
URL:	https://youtu.be/DhHqze1VfdY					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Video No. 6

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0429.MOV	Video Date:	01/15/2020	Time:	10:36
Videographer:	Justin Chen				
Description:	Digester 4 missing bolt leaking visual emissions.				
URL:	https://youtu.be/qW6_SwL4W3I				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Video No. 7

Location:	Evergreen Packaging, Inc. Pine Bluff Mill				☐ Image Modified	
City:	Pine Bluff	Jefferson County			State:	AR
Filename:	DSCN0434.MOV		Video Date:	01/15/2020	Time:	11:54
Videographer:	Justin Chen					
Description:	Visual emissions leak from Blow tank C.					
URL:	https://youtu.be/YjtAEZlbTO8					





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Video No. 8

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0450.MOV	Video Date:	01/16/2020	Time:	09:20
Videographer:	Justin Chen				
Description:	5B Washer liquid leak on front side.				
URL:	https://youtu.be/RkvGih7PXNU				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Video No. 9

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0453.MOV	Video Date:	01/16/2020	Time:	09:57
Videographer:	Justin Chen				
Description:	Visual emission leak from 7B Bleach Plant Tower at flange and connecting pipe.				
URL:	https://youtu.be/OLWQ4Jl8z2Y				





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Video No. 10

Location:	Evergreen Packaging, Inc. Pine Bluff Mill			☐ Image Modified	
City:	Pine Bluff	Jefferson County		State:	AR
Filename:	DSCN0455.MOV	Video Date:	01/16/2020	Time:	10:19AM
Videographer:	Justin Chen				
Description:	Visual emissions from leak on 1B Seal Pit.				
URL:	https://youtu.be/IVQyNei2PE0				



Appendix 3

Opening Conference Sign-In sheet

Opening/Pre-Inspection Meeting

Commence opening/pre-inspection meeting

Time: 1:15 pm

Name	Title	Representing	Telephone No.
Sarah Frey	Physical Scientist	EPA RC6	214-665-6499
Lisa Bowling	Environmental Consultant	Evergreen	870-540-9621
Bernard A. (Bobby) Burns	EHS MGR NA	Packaging Evergreen	870-489-
William Hynick	EHS Mgr	EPI	870-267-8249
Julie Brimer	Envr. Mgr.	EPI	870-543-9448
GARY BORTZ	INSP SUPV	AD&Q	501-682-0706
Todd Beekman	Bum Pulp/Power	EPI	870-575-3314
Kevin Kidder	Ops Mgr	EPI	870-329-0844
Otis Hill	Pulp Mgr	EPI	870-489-798
Justin Chen	Environmental Engineer	EPA RC6	214-665-2272
Garry Butler	Power & Recovery	EPI	870-329-6439

Conclude opening/pre-inspection meeting

Time: approx 1:45

Initials / Date:

SJ, 1/14/2020

Appendix 4

Document Request List

**EVERGREEN PACKAGING, INC., PINE BLUFF MILL
PINE BLUFF, ARKANSAS
EPA REGION 6 RECORDS/DOCUMENTS REQUEST**

GENERAL PROCEDURE

During the Clean Air Act (CAA) compliance investigation at Evergreen Packaging, Inc, Pine Bluff 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 three sections. The first section consists of documents that EPA would like available and copies prepared (as noted) on January 14, 2020. The second section consists of documents that EPA would like available electronically (on disk or thumb drive) no later than January 16, 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 January 14, 2020

1. Description for all process areas (2 copies and electronically)
2. Detailed process flow diagrams (2 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 copy 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 and updates to the control strategy including descriptions for the following:
 - i. Equipment systems and emission points that comprise the Clean Condensate Alternative (CCA) affected source
 - ii. Air pollution control technologies that would be used to meet the requirements of § 63.443(a)(1)(ii) through (a)(1)(v)
 - iii. The CCA technology used
 - B. Notification of compliance status
 - C. Semiannual reports from 2017 to present
 - D. Initial and most recent performance tests for emissions sources subject to §§ 63.443 and 63.446
 - E. Start-up, shut-down, and malfunction plan
 - F. Visual inspections of closed vent system from 2017 to present and annual Method 21 inspections
 - G. Requests and approvals for alternatives and/or variances from requirements
 - H. A complete list of all bypass lines and method of flow indication for each
 - I. 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 2017 to present.
 - J. Calculations as required for compliance with the CCA including:
 - i. HAP emissions on a kilogram per megagram of oven dried pulp (ODP)
 - ii. Baseline HAP emissions for each equipment system and the total equipment systems in the CCA affected source
 - iii. HAP emission reductions from baseline HAP emissions based upon complying with the requirements of § 63.443(a)(1)(ii) through (a)(1)(v); and HAP emissions reductions from complying with the CCA technology

PART 2 - Please have these documents available by January 16, 2020

12. For 40 CFR Part 63, Subpart MM provide (electronically, if possible):
- A. Initial notification report
 - B. Notification of compliance status
 - C. Initial and most recent performance tests used to establish operating ranges for monitoring parameters
 - D. Semiannual reports from 2017 to present
 - E. Start-up, shut-down, and malfunction plan
 - 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 or Access format) from 2017 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 and most recent performance tests used to establish operating ranges for monitoring parameters
 - B. Semiannual reports from 2017 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 2017 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 2017 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:

0940

Name	Title	Representing	Telephone No.
Justin Chan	Environmental Engineer	EPA RG	214-665-2273
Sarah Frey	Physical Scientist	EPA RG	214-665-6499
Otis Hill	Area Mgr	EPI	870-659-4289
Rob Lutetz	BUM-QA & ME	EPI	870-541-5692
Melissa Cramer	HR Manager	Evergreen	870-395-0857
Todd Beekman	BUM Power Pulp	Evergreen	870-575-3314
Kevin Kiddle	Ops Mgr	Evergreen	870-329-0849
Bruce Bous	EH&S Mgr. NA Pac	Evergreen	870-489-4815
MARK HAUK	GENERAL MANAGER	EPI	740-253-9076
Will Huyck	EH&S mgr.	EPI	870-267-8249
Lisa Bowling	Env. Consultant	EPI	870-540-9621
Julie Brimer	Env Mgr.	EPI	870-543-9448
GARY BORTZ	INSPECTION SUPV	AD&Q	501-682-0706
Brock Joblin	Controller	EPI	870-541-5826
Keith Brass	PS&D	EPI	870-502-9566
Joel C. McVey	EXTRAUDER B.U.M	EPI	870-541-3835
Wes Miller	PM2 B.U.M.	EPI	870-541-6502
Al Henderson	Pulp Mill	EPI	870-692-8947
Garry Butler	Power Mgr	EPI	870-541-3845

Conclude meeting

Time:

Reg. Paige (phone) Associate General Counsel, EPI 901-371-7660

Initials / Date:

AJ 11/17/2020

Appendix 6

List of Non-Digester Visible Emissions During Inspection

List of Non-Digester Visible Emissions During Inspection

- Visible vapor emissions from hole in Blow Heat Accumulator
- Visible vapor emissions from Blow Tank B
- Visible vapor emissions from Blow Tank C
- Visible vapor emissions from piping between Bodies 1 and 2 in Multiple Effect Evaporator Set 2
- Visible vapor emissions from Main Condensate Tank Header
- Visible vapor and liquid emissions from Bleach Plant Washers
- Visible vapor emissions from Tower 7B pipe and flange
- Open hole in Tower 3B
- Visible vapor emissions from 1B Seal Pit