



Texas Commission on Environmental Quality
Form OP-UA30
Kraft, Soda, Sulfite, and Stand-Alone
Semichemical Pulp Mill Attributes

General:

This form is used to provide a description and data pertaining to all affected units at kraft, soda, sulfite, and stand-alone semichemical pulp mills with potentially applicable requirements associated with a particular regulated entity number and application. Each table number, along with the possibility of a corresponding letter (i.e., Table 1a, Table 1b), corresponds to a certain state or federal rule. If the rule on the table is not potentially applicable to a kraft pulp mill, then it should be left blank and need not be submitted with the application. If the codes entered by the applicant show negative applicability to the rule or sections of the rule represented on the table, then the applicant need not complete the remainder of the table(s) that corresponds to the rule. Further instruction as to which questions should be answered and which questions should not be answered are located in the “Specific” section of the instruction text. The following is included in this form:

Table 1a - 1b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart BB: Standards of Performance for Kraft Pulp Mills

Table 2: Title 30 Texas Administrative Code Chapter 112 (30 TAC Chapter 112)
Control of Total Reduced Sulfur

Tables 3a - 3b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart MM: National Emission Standards for Hazardous Air Pollutants for Chemical Recovery
Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills

The Texas Commission on Environmental Quality (TCEQ) Regulated Entity Number (RNXXXXXXXXXX) and the application area name from Form OP-1 (Site Information Summary) must appear in the header of each page for the purpose of identification for the initial submittal. The date of the initial form submittal must also be included and should be consistent throughout the application (MM/DD/YYYY). **Leave the permit number blank for the initial form submittal.** If this form is included as part of the permit revision process, enter the permit number assigned by the TCEQ, the area name (from Form OP-1), the date of the revision submittal, and the regulated entity number.

Unit attribute questions that do not require a response from all applicants are preceded by qualification criteria in the instructions. If the unit does not meet the qualification criteria, a response to the question is not required. **Anytime a response is not required based on the qualification criteria, leave the space on the form blank.**

Notwithstanding any qualification criteria in the form instructions or information provided in other TCEQ guidance, the applicant may leave an attribute question blank (or indicate “N/A” for “Not Applicable”) if the attribute is not needed for the applicable requirement determinations of a regulation for a unit.

In some situations, the applicant has the option of selecting alternate requirements, limitations, and/or practices for a unit. Note that these alternate requirements, limitations, and/or practices must have the required approval from the TCEQ Executive Director and/or the U.S. Environmental Protection Agency Administrator before the federal operating permit application is submitted.

The TCEQ requires that a Core Data Form be submitted on all incoming registrations unless a Regulated Entity and Customer Reference Number have been issued by the TCEQ and no core data information has changed. If a Regulated Entity or Customer Number has been issued, then the number must be noted on the request or applicable form. For more information regarding the Core Data Form, call (512) 239-5175 or go to the TCEQ Web site at www.tceq.texas.gov/permitting/central_registry.

Specific:

**Table 1a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart BB: Standards of Performance for Kraft Pulp Mills**

Unit ID No.: Enter the identification number (ID No.) for the unit at a kraft pulp mill (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

SOP Index No.: Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please refer to the TCEQ website at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_initial.pdf.

Facility Type: Select one of the following options to describe the facility type. Enter the code on the form.

Code	Description
SKRFUR	Straight kraft recovery furnace
CRFUR	Cross recovery furnace
SDTNK	Smelt dissolving tank
LKILN	Lime kiln
DIG	Digester
BSW	Brown stock washer
MEES	Multiple effect evaporator
CONS	Condensate stripper

Construction/Modification Date: Enter one of the following options that describe the date of commencement of the most recent construction or modification. Enter the code on the form.

Code	Description
76-	Affected source was constructed/modified on or before September 24, 1976
76+	Affected source was constructed/modified after September 24, 1976

▼ **Continue only if “Construction/Modification Date” is “76+.”**

Kraft Pulping Combination: Enter “YES” if kraft pulping is combined with neutral sulfite semi-chemical pulping. Otherwise, enter “NO.”

★ **Complete “Material Origin” only if “Kraft Pulping Combination” is “YES.”**

Material Origin: Enter “YES” if any portion of the material charged to an affected facility is produced by the kraft pulping operation. Otherwise, enter “NO.”

★ **Complete the rest of Table 1a only if “Facility Type” is “SDTNK” or “LKILN.”**

Scrubber: Enter “YES” if the smelt dissolving tank uses a scrubber emission control device. Otherwise, enter “NO.”

★ **Complete “Control Device ID No.” only if “Facility Type” is “LKILN.”**

Control Device ID No.: Enter the identification number (ID No.) for the control device to which emissions are routed (maximum 10 characters). This number should be consistent with the control device identification number listed on Form OP-SUM. If there is not a control device, then leave this column blank.

Fuel Type: Enter one of the following options to describe the type of fuel burned in the lime kiln.

Code	Description
GAS	Gaseous fossil fuel
LIQ	Liquid fossil fuel
OTHER	Other fuel type

**Table 1b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart BB: Standards of Performance for Kraft Pulp Mills**

★ **Complete only if “Construction/Modification Date” is “76+” and “Facility Type” is “DIG,” “BSW,” “MEES,” or “CONS.”**

Unit ID No.: Enter the identification number (ID No.) for the unit at a kraft pulp mill (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

SOP Index No.: Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please refer to the TCEQ website at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_initial.pdf.

Gas Control Techniques: Select one of the following options to describe the control technique used to control gases from the facility. Enter the code on the form.

Code	Description
CLK	Gases are combusted in a lime kiln subject to 40 CFR § 60.283(a)(5)
CRF	Gases are combusted in a recovery furnace subject to 40 CFR § 60.283(a)(2) or (a)(3)
INC/CMB	Gases are combusted with other waste gases in an incinerator or other combustion device
LK/RF	Gases are combusted in a lime kiln or recovery furnace not subject to 40 CFR Part 60, Subpart BB
NONCOM	Gases are controlled by a non-combustion control technique
NONE	None

Control Device ID No.: Enter the identification number (ID No.) for the control device to which emissions are routed (maximum 10 characters). This number should be consistent with the control device identification number listed on Form OP-SUM. If there is not a control device, then leave this column blank.

★ **Complete “Minimum Temperature” only if “Gas Control Technique” is “INC/CMB” or “LK/RF.”**

Minimum Temperature: Enter “YES” if the gases are subject to a minimum temperature of 1200F for at least 0.5 seconds. Otherwise, enter “NO.”

- ▼ Continue only if “Gas Control Technique” is “NONCOM” or “NONE”; or if “Gas Control Technique” is “INC/CMB” or “LK/RF” and “Minimum Temperature” is “NO.”
- ★ Complete Feasibility only if “Facility Type” is “BSW.”

Feasibility: Enter “YES” if incineration of the exhaust gases from a brown stock washer has been demonstrated to be technologically or economically unfeasible. Otherwise, enter “NO.”

- ★ Complete “Uncontrolled Gas” only if “Facility Type” is “DIG.”

Uncontrolled Gas: Enter “YES” if uncontrolled gas from a digester contains total reduced sulfur less than 0.005 g/kg air dried unbleached pulp (ADP) (0.01 lb/ton ADP). Otherwise, enter “NO.”

**Table 2: Title 30 Texas Administrative Code Chapter 112 (30 TAC Chapter 112)
Control of Air Pollution from Sulfur Compounds**

Unit ID No.: Enter the identification number (ID No.) for the unit at a kraft pulp mill (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

SOP Index No.: Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please refer to the TCEQ website at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_initial.pdf.

Facility Type: Select one of the following options to describe the facility type. Enter the code on the form.

Code	Description
ODFUR	Old design furnace
NDFUR	New design furnace
CRFUR	Cross recovery furnace
SDTNK	Smelt dissolving tank
LKILN	Lime kiln
DIG	Digester
MEES	Multiple effect evaporator
CONS	Condensate stripper
NONE	None of the above

Alternate Emission Limitation: Enter “YES” if an alternate emission limitation (AEL) has been approved by the TCEQ Executive Director. Otherwise, enter “NO.”

AEL ID No.: If an AEL has been approved by the TCEQ Executive Director, then enter the corresponding AEL unique identifier for each unit (maximum 10 characters). If the unique identifier is unavailable, then enter the date of the AEL approval letter in the table column. The unique identifier and/or the date of approval letter is contained in the compliance file under the appropriate regulated entity number. Otherwise, leave this column blank.

**Table 3a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart MM: National Emission Standards for Hazardous Air Pollutants for Chemical Recovery
Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills**

Unit ID No.: Enter the identification number (ID No.) for the unit at a kraft, soda, sulfite, or stand-alone semichemical pulp mill (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

SOP Index No.: Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please refer to the TCEQ website at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_initial.pdf.

Source Type: Select one of the following options to describe the source type. Enter the code on the form.

For kraft or soda pulp mills:

Code	Description
DCE	Direct contact evaporator (DCE) recovery furnace
NDCE	Nondirect contact evaporator (NDCE) recovery furnace
SDTNK	Smelt dissolving tank
LKILN	Lime kiln

For sulfite pulp mills:

Code	Description
SULF	Sulfite combustion unit

For stand-alone semichemical pulp mills:

Code	Description
SEMI	Semichemical combustion unit

New or Existing Source: Select one of the following options to describe the source. Enter the code on the form.

Code	Description
NEW	New source
EX	Existing source

★ **Complete “Kraft or Soda Source Alternative” only if “Source Type” is “DCE,” “NDCE,” “SDTNK,” or “LKILN” and “New or Existing Source” is “EX.”**

Kraft or Soda Source Alternative: Enter “YES” if the source at an existing kraft or soda pulp mill operates 6,300 hours per year or more and is complying with the requirements of 40 CFR § 63.862(a)(1)(ii). Otherwise, enter “NO.”

★ **Complete “Subject to 40 CFR § 60.282” only if “Alternative” is “YES.”**

Subject To 40 CFR § 60.282: Enter “YES” if the source is subject to 40 CFR § 60.282. Otherwise, enter “NO.”

**Table 3b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart MM: National Emission Standards for Hazardous Air Pollutants for Chemical Recovery
Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semicheical Pulp Mills**

Unit ID No.: Enter the identification number (ID No.) for the unit at a kraft, soda, sulfite, or stand-alone semicheical pulp mill (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

SOP Index No.: Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please refer to the TCEQ website at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_initial.pdf.

Control System: Select one of the following control techniques used for source type. Enter the code on the form.

For Source Types “DCE,” “NDCE,” and “LKILN”:

Code	Description
SCRUB	Wet scrubber
ESP	Electrostatic precipitator
OTHER	Alternative emission control system approved by the EPA Administrator

For Source Types “SDTNK” and “SULF”:

Code	Description
SCRUB	Wet scrubber
OTHER	Alternative emission control system approved by the EPA Administrator

For Source Type “SEMI:”

Code	Description
RTO	Regenerative thermal oxidizer
OTHER	Alternative emission control system approved by the EPA Administrator

Control Device ID No.: Enter the identification number (ID No.) for the control device to which emissions are routed (maximum 10 characters). This number should be consistent with the control device identification number listed on Form OP-SUM. If there is not a control device, then leave this column blank.

Alternative Operating Parameter: Enter “YES” if the owner or operator has received prior approval from the EPA Administrator to monitor an alternative control device operating parameters. Otherwise, enter “NO.”

★ **Complete “Alternative ID No.” only if “Control System” is “OTHER” or “Alternative Operating Parameter” is “YES.”**

Alternative ID No.: If an alternative has been approved by the EPA Administrator, then enter the corresponding unique identifier for each unit (maximum 10 characters). If the unique identifier is unavailable, then enter the date of the approval letter in the table column. The unique identifier and/or the date of approval letter is contained in the compliance file under the appropriate regulated entity number. Otherwise, leave this column blank.

Subject To 40 CFR PART 63, SUBPART S: Enter “YES” if the source is also subject to 40 CFR Part 63, Subpart S. Otherwise, enter “NO.”

**Texas Commission on Environmental Quality
 Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes
 Form OP-UA30 (Page 1)
 Federal Operating Permit Program**

**Table 1a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
 Subpart BB: Standards of Performance for Kraft Pulp Mills**

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

Unit ID No.	SOP Index No.	Facility Type	Construction/ Modification Date	Kraft Pulping Combination	Material Origin	Scrubber	Control Device ID No.	Fuel Type

**Texas Commission on Environmental Quality
 Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes
 Form OP-UA30 (Page 2)
 Federal Operating Permit Program**

**Table 1b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
 Subpart BB: Standards of Performance for Kraft Pulp Mills**

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

Unit ID No.	SOP Index No.	Gas Control Technique	Control Device ID No.	Minimum Temperature	Feasibility	Uncontrolled Gas

Texas Commission on Environmental Quality
Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes
Form OP-UA30 (Page 3)
Federal Operating Permit Program

Table 2: Title 30 Texas Administrative Code Chapter 112 (30 TAC Chapter 112) Control of Total Reduced Sulfur

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

Unit ID No.	SOP Index No.	Facility Type	Alternate Emission Limitation	AEL ID No.

**Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes
Form OP-UA30 (Page 4)
Federal Operating Permit Program**

**Table 3a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart MM: National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda,
Sulfite, and Stand-Alone Semichemical Pulp Mills**

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

Unit ID No.	SOP Index No.	Source Type	New or Existing Source	Kraft or Soda Source Alternative	Subject to 40 CFR § 60.282

Kraft, Soda, Sulfite, and Stand-Alone Semicheical Pulp Mill Attributes

Form OP-UA30 (Page 5)

Federal Operating Permit Program

Table 3b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart MM: National Emission Standards for Hazardous Air Pollutants for Chemical Recovery

Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semicheical Pulp Mills

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

Unit ID No.	SOP Index No.	Control System	Control Device ID No.	Alternative Operating Parameter	Alternative ID No.	Subject to 40 CFR Part 63, Subpart S