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Morristown, TN 37813
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Ms. Michelle W. Owenby
Technical Secretary
Tennessee Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243

RE: Operating Permit # 466831
Change in Emission Sources Source # 32-0028-01 (One (1) 750 hp High Pressure Boiler)

November 8, 2018 (Amended)

Ms. Owenby,

International Paper in Morristown, TN has purchased a new burner for our 750 hp High Pressure Boiler that will replace the existing burner that is currently on it. This is listed on our Operating Permit # 466831, source # 32-0028-01 (One (1) 750 hp High Pressure Boiler).

Section II, Condition 12: The total maximum heat input capacity for this fuel-burning source shall not exceed 38.9 million Btu per hour (MMBtu/hr), on a daily average basis. TAPCR 1200-03-09-.02(6) and the application dated December 19, 2012.

The current burner is original to the Johnston Boiler, PFTE750-4LG-250S, which has a maximum capacity of 31.385 million Btu per hour.

The new burner that we are purchasing is an Oilon Model GP-1000M WD100 FGR 30 ppm Low NOx, which has a maximum capacity of 37.875 million Btu per hour.

Additional Emissions data can be seen on the next page.

Approximate date of change: November 25, 2018

Reason for Air Permit Change: International Paper Morristown is replacing the burner on our boiler due to the age and availability of spare parts.

International Paper declares that the equipment change does not result in emissions exceeding the emissions allowable under the existing operating permit for this source or any new pollutants being emitted.

If you have any questions, please do not hesitate to call.

A handwritten signature in blue ink, appearing to read "Mike Thompson", followed by the date "11.8.19".

Mike Thompson Date
General Manager
International Paper, Morristown, TN
423-318-1201

A handwritten signature in blue ink, appearing to read "Carl W. Frost", followed by the date "11.8.18".

Carl W Frost Date
EHS Representative
International Paper, Morristown, TN
423-318-1226

Maximum Potential to Emit based on 24 [Hr/Day] and 365 [Days/Year]				
	Particulate Matter (TSP) shall not exceed 10.9 [lbs/hr]	Nitrogen Oxide shall not exceed 5.8 [lb/hr] and 25.2 tons during any 12 consecutive months	Carbon Monoxide shall not exceed 3.3 [lb/hr] and 14.3 tons during any 12 consecutive months	Sulfur Dioxide shall not exceed 18.4 [lb/hr] and 75.1 tons during any 12 consecutive months
Current Burner	0.239 [lbs/hr]	3.138 [lb/hr] 13.747 [tons/12 months]	2.636 [lb/hr] 11.547 [tons/12 months]	0.019 [lb/hr] 0.083 [tons/12 months]
New Burner	0.287 [lbs/hr]	1.894 [lb/hr] 8.295 [tons/12 months]	3.182 [lb/hr] 13.935 [tons/12 months]	0.023 [lb/hr] 0.1 [tons/12 months]

Rule 1200-03-02-.01(aa)4. of the Tennessee air pollution control regulations says that a physical change or change in the method of operation at an existing facility does not require a construction permit as long as it meets the following conditions.

1. The change is not subject to Title V, PSD, or nonattainment NSR (none of these programs would apply to an existing conditional major facility if there is no emission increase)
2. The change does not result in emissions that exceed the allowable emissions in the existing operating permit; and
3. The change does not result in the emission of any air contaminant not previously emitted.

A facility that wants to make changes using this rule must provide written notification to us at least 7 days in advance of the proposed change. The written notification needs to contain:

- a brief description of the change,
- the date on which the change will occur,
- pollutants emitted,
- declaration of any change in emissions, and
- any applicable requirements that would apply as a result of the change (this means that you have to tell us if any Federal NSPS, MACT, or similar rules would apply as a result of the change).

The written notice must also contain a statement that the change does not result in emissions exceeding the emissions allowable under the existing operating permit. You can make the change 7 days after sending us the letter, and you do not have to wait for a response from us.

We will send you a response letter or an amended permit that shows the updated source description .