QUESTIONS AND ANSWERS (Q&A's) FOR THE PULP AND PAPER NESHAP SECOND VOLUME

(40 CFR Part 63, subpart S)

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Introduction

National Emission Standard(s) for Hazardous Air Pollutants (NESHAP)

This document provides implementation information by supplying answers to frequently asked questions on the Pulp and Paper NESHAP (40 CFR 63, subpart S). This document is the second volume and will be updated from time to time with additional or changes to questions and answers (Q&As). This document will be changed and updated without public notice. You should check the pulp and paper NESHAP website for copies and updates of this document, as well as additional information on this NESHAP.

For more information on the Pulp and Paper NESHAP, visit the web site at: www.epa.gov/ttn/uatw/pulp/pulppg.html

The statements in this document are intended solely as guidance to aid you in understanding the NESHAP. The guidance is not a substitute for reading the regulation and understanding all its requirements as they apply to a site-specific situation. This guidance does not constitute rule making by the EPA and may not be relied on to create a substantive or procedural right or benefit enforceable actions, at law or in equity, by any person. You also need to bear in mind that answers to these questions may vary widely depending on site-specific process and equipment configurations. If you have questions about how, or if, this regulation applies, you should consult the delegated permitting authority and the Applicability Determinations Index (ADI). If after reading the regulation, preambles to the regulation, and consulting the ADI, you are unable to determine whether or not a particular regulation applies to activities at your source, you can request, in writing, an applicability determination from the delegated permitting authority. In turn, the delegated permitting authority will pass on questions they might have to their EPA regional contacts.

The Applicability Determinations Index (ADI) is the repository of Clean Air Act regulatory applicability determinations and related policy documents. For more information on the ADI, visit the web site at: www.epa.gov/oeca/main/compasst/chem.html

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Questions and answers are organized and presented by section of the NESHAP.

Within each NESHAP section, the questions of individual volumes are numbered consecutively.

§63.440 Applicability

Questions 1 and 2 are contained in volume 1 (September 22, 1999) of the question and answer document.

Pulping line means a group of equipment arranged in series such that the wood chips are digested and the resulting pulp progresses through a sequence of steps that may include knotting, refining, washing, thickening, blending, storing, oxygen delignification, and any other equipment serving the same functions as previously listed (§63.441).

Pulping system means all process equipment, beginning with the digester system, and up to and including the last piece of pulp conditioning equipment prior to the bleaching system, including treatment with ozone, oxygen, or peroxide before the first application of a chemical bleaching agent intended to brighten pulp. The pulping system includes pulping process condensates and can included multiple pulping lines (§63.441).

Q3. If I construct a new pulping line to replace an existing pulping line, is the new pulping line subject to new source requirements? [§63.440(c)(3)]

For pulping systems, the NESHAP specifies new sources as an additional pulping line or a constructed or reconstructed pulping system (total of all pulping equipment) that commenced construction after December 17, 1993 [§63.440(c)(3)]. A replacement pulping line could become subject to the new source MACT requirements in two ways.

First, a replacement pulping line would be subject to new source requirements if it qualifies as an additional line or a reconstructed source. If the replacement pulping line adds capacity to an existing pulping system, then the replacement line would qualify as an additional line and would be subject to new source requirements.

Second, if the fixed capital costs of the replacement pulping line are 50 percent of the fixed capital cost that would be required to construct a new pulping system, then the entire pulping system would qualify as a reconstructed source and must meet the new source requirements. The specific definition of a reconstructed source is provided in the general provisions to part 63 (40 CFR 63.2 subpart A). Definitions for pulping lines and pulping systems are provided in §63.441.

§63.440 Applicability (Continued)

Only kraft pulping processes have direct requirements for controlling HAPs in condensates.

Q4. What are the control requirements for condensates that are discharged from a piece of equipment that is shared by two different pulping processes? [§63.440(f)]

If you have process equipment that is shared by more than one type of pulping process, then you must comply with the most stringent applicable NESHAP requirements for that piece of equipment.

As specified in §63.440(f), when one or more pieces of affected process equipment are shared by more than one type of pulping process, the shared process equipment must comply with the applicable requirement that achieves the maximum degree of HAP reduction. For example, the condensates from an evaporation system that processes both weak black liquor from a kraft pulping process and spent liquor from a semi-chemical process would have to comply with the kraft subcategory requirements for the full volume of condensates from the evaporator system. This more stringent requirement applies because it is not possible to isolate the condensate streams attributable to each pulping process to determine compliance separately (see the April 15, 1998 promulgation preamble, 63 FR 18508).

§63.441 Definitions

At this time, no Q&A's are provided for this section.

§63.443 Standards for the Pulping System at Kraft, Soda, and Semi-Chemical Processes

BMP spill requirements are intended to reduce mill wastewater loadings of non-chlorinated toxic compounds and hazardous substances by preventing or otherwise containing leaks and spills of spent pulping liquor, soap, and turpentine and by controlling intentional diversions of these materials.

Q4. If I install storage tanks to comply with the best management practices (BMP) spill requirements of the Effluent Limitations Guidelines, would these tanks be subject to the new weak liquor storage tank requirements? [§63.443(a)(2)(iv)]

The NESHAP control requirements apply only to weak liquor storage tanks at new kraft pulping systems. There is no specific exemption in the NESHAP for weak liquor storage tanks that are installed to comply with the BMP requirements of the Effluent Limitations Guidelines. However, weak liquor storage tanks are subject to the NESHAP if they are constructed as part of a new source.

The NESHAP defines new sources as constructed or reconstructed pulping systems or additional pulping lines (see §63.440(c) for new source applicability). The addition of a storage tank without other modifications is not likely to trigger new source requirements because its cost would be much less than 50 percent of the much larger pulping system (i.e., reconstruction). Weak liquor storage tanks meeting the requirements for new sources would be required to collect and convey vent streams to a control device meeting the requirements specified in §63.443(c) and (d) of the NESHAP.

Weak liquor storage tank means any storage tank except washer filtrate tanks containing spent liquor recovered from the pulping process and prior to the evaporator system (§63.441).

Q5. Do I have to control emissions from intermediate liquor storage tanks used in my evaporator system? [§63.443(a)(2)(iv)]

No. Intermediate liquor storage tanks or other tanks used to store liquor once the evaporation process has begun are not subject to any requirements under the NESHAP.

Weak liquor storage tanks at new sources are the only storage tanks associated with the evaporator system that must be controlled (see §63.440(c) for the definition of new sources). However, storage tanks located after the evaporator feed stages do not meet the definition of a weak liquor storage tank because weak liquor storage tanks are defined as being located prior to the evaporator system. No other liquor storage tanks associated with the evaporator system are subject to any control requirements under the NESHAP.

Q6. Do I have to control emissions from oxygen delignification system reactor vents? [§63.443(a)(1)(v)]

Oxygen delignification system means the equipment that uses oxygen to remove lignin from pulp after high-density stock storage and prior to the bleaching system. The oxygen delignification system equipment includes the blow tank, washers, filtrate tanks, any interstage pulp storage tanks, and any other equipment serving the same function as those previously listed (§63.441).

The definition of oxygen delignification system in the NESHAP (§63.441) does not specifically name reactor vents. Based on the data submitted to EPA following proposal (Air docket A-92-40, item IV-D1-29), the emissions from the oxygen delignification system reactor are vented through the system's blow tank; consequently, we did not name reactor vents in the oxygen delignification system definition. However, if your oxygen delignification system reactor is not vented to the blow tank, then the reactor would be covered under the definition of oxygen delignification system because it is functioning as a blow tank (relieving vessel pressure before/during discharge of reactor contents). In this case, you would be required to collect and control reactor emissions according to §63.443(c) and (d). If the vents on your oxygen delignification system reactor operate only under infrequent and not preventable circumstances (i.e., emergency pressure relief), then these episodes would not be covered by the collection and control requirements in this subpart. However, you would have to include such episodes in your startup, shutdown, and malfunction plan and take steps to minimize these emissions (§63.6(e)).

Digester system means each continuous digester or each batch digester used for the chemical treatment of wood or non-wood fibers. The digester system equipment includes associated flash tanks(s), blow tanks(s), chip steamer(s) not using fresh steam, blow heat recovery accumulator(s), relief gas condenser(s), prehydrolysis unit(s) preceding the pulp washing system, and any other equipment serving the same function as those previously listed. The digester system includes any of the liquid streams or condensates associated with batch or continuous digester relief, flow, or flash steam processes (§63.441).

Q7. Do I have to control the emissions from my batch digesters when they are being uncapped? [§63.443(a)(1)(i)]

No. Digester uncapping processes are not subject to any requirements under the NESHAP. We did not cover the uncapping process because we are aware of only 2 mills that control uncapping emissions. Additionally, essentially all of the contents (pulp and digestion gases) of the batch digester are blown under pressure to the blow tank, and the digester is now at atmospheric pressure. If this is the case, controlling uncapping emissions would not be a cost-effective control option for existing or new sources.

Q8. Do I have to control emissions from my chip bins? [§63.443(a)(1)(i)]

Chip bins are not subject to any requirements under the NESHAP, except in one circumstance. If a chip bin is serving the same function as a chip steamer, and the steam entering the chip bin is not fresh steam, then it is considered a chip steamer. In the NESHAP, chip steamers not using fresh steam are included as part of the digester system definition and would therefore be required to be controlled as part of the low volume, high concentration (LVHC) system (§63.443(a)).

Chip steamer means a vessel used for the purpose of preheating or pretreating wood chips prior to the digester, using flash steam from the digester or live steam (§63.441).

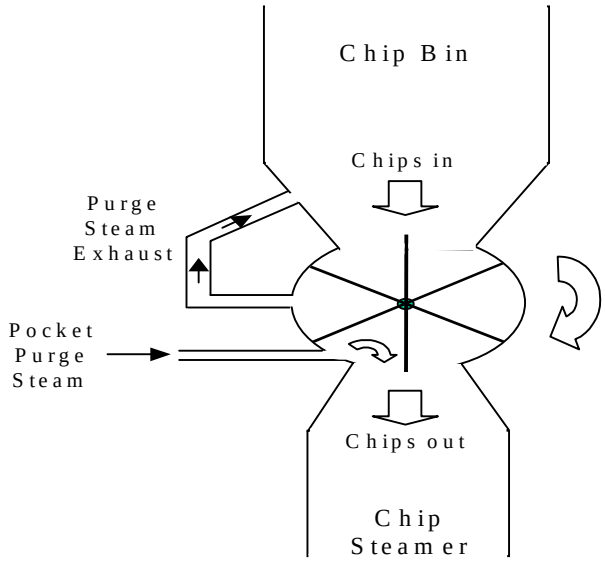
Q9. In a continuous digester, if the rotary valve that feeds chips into the chip steamer allows emissions from the chip steamer to escape into the chip bin, do I have to control emissions from the chip bin? [§63.443(a)(1)(i)]

If you are using fresh steam in the chip steaming vessel, then you do not have to control emissions from your chip bin. However, if you are using

Chip steamers that do not use fresh steam are included in the definition of digester systems which are part of the low volume, high concentration (LVHC) system. LVHC systems have until April 16, 2001 to comply with the control requirements of the NESHAP.

flash steam or some other non-fresh steam in the chip steaming vessel, then you may have to control emissions from the chip bin, as explained below.

As stated in the definition for digester systems (§63.441), any chip steamer (or other equipment serving the same function) that does not use fresh steam is considered part of the digester system, and therefore, must be controlled by April 16, 2001. On many continuous digester systems, chips from the chip bin are continuously fed into a steamer by a rotary valve, and these valves may allow small amounts of contaminated steam to escape from the steamer back into the chip bin. However, the majority (85 to 95 percent) of continuous digester chip steamers are operated such that there are no emissions from the chip bin (see figure).



Mills that use flash steam in the chip steamer may employ methods to prevent contaminated steam from entering the chip bin such as purging of the rotary valve with fresh steam or use of hydrogen sulfide monitors to indicate when flash steam has escaped into the chip bin.

In these chip steamers, chips flow from the chip bin into the chip steamer by gravity into the empty pockets of the rotating valve. As the valve rotates, chips fall into the chip steamer and the valve pocket collects contaminated steam from the steaming vessel. However, industry representatives report that most of these systems use a fresh steam purge cycle. A blast of fresh steam purges the valve pocket of (1) contaminated steam (for a mill using

flash steam in the chip steamer) and (2) any chips that have not fallen into the chip steamer on their own. After the purge step, the pocket is rotated to a closed position where any remaining steam is vented from the valve before the valve is rotated into position to receive new chips from the chip bin. This pocket purge vent is typically vented into the chip bin although in some reported cases, the pocket purge vent stream is collected in the LVHC or HVLC control systems or vented back into a chip steamer or digester controlled to the level of the standard. The majority of systems vent the pocket purge steam into the chip bin at a sufficiently low level such that the emissions are covered by fresh chips (the depth of chips is typically 10 to 15 feet above the pocket purge vent).

Industry representatives estimate that 0.1 percent of contaminated steam remains in the rotating valve pocket after a typical purge with fresh steam. That amount of steam contains approximately 0.0018 pounds of methanol per ton of oven-dried pulp and represents about 0.06 percent of emissions from a continuous digester. Due to the temperature difference between the chips in the chip bin (ambient) and the boiling point of methanol (approximately 150 degrees Fahrenheit), this methanol will condense on the chips and be returned to the chip steamer.

If you operate and maintain the chip steamer in this manner (i.e., with fresh pocket purge steam, introduction of the remaining contaminated pocket steam near the bottom of the chip bin, and you maintain the chip bin level (10-15 feet or more)), the chip bin does not release HAP emissions (i.e., the emissions from the chip steamer are always controlled) and vent from the chip bin does not need to be controlled. However, if you are using flash steam or some other non-fresh steam in the chip steaming vessel and release it into the chip bin, and you are not operating the system as described above, then you must control emissions from the chip bin.

If you use process water other than fresh water, whitewater from the paper machine, or process water with a total HAP concentration greater than 400 ppmw in your decker that processes kraft pulp, then you must control emissions from the decker.

Q10. If I use fresh water or paper machine whitewater as process water in the decker system, do I have to test the methanol concentration?[§63.443(a)(1)(iv)]

You do not need to test the methanol concentration if only fresh water or paper machine whitewater is used as the process water in an existing decker.

Decker systems that use process water are operated similarly to and have similar emissions as pulp washers. Decker systems used in this manner may receive contaminated condensates or filtrates that may be recycled from other processes, such as the oxygen delignification system or combined condensate tanks. These process waters may have a HAP concentration that would release significant amounts of HAP to the air from the air-water interface. We evaluated the relationship between HAP concentration in the process water and HAP emissions and determined that it was appropriate to make a distinction among types of decker systems at existing sources for the purpose of setting the MACT standard (see the April 15, 1998 promulgation preamble, 63 FR 18520). Based on this evaluation, decker systems at existing sources using process water with HAP concentrations less than 400 parts per million by weight (ppmw), are not required to be controlled. However, to ease implementation of the NESHAP and reduce the testing burden (for 400 ppmw) on facilities, we gathered available test data (Air docket A-92-40, item IV-D1-38) and determined that in all cases, the methanol concentration in fresh water and whitewater was well below 400 ppmw.

Based on this evaluation, we decided to specify that decker systems that use fresh water or whitewater from papermaking systems are not required to be controlled at existing sources. If there is a question as to whether contaminated water is being used instead of fresh water or clean

whitewater, a test to determine the methanol concentration can and should be requested by the permitting authority. Decker systems at new sources are required to be controlled regardless of the HAP concentration in the process water introduced into the decker.

§63.444 Standards for the Pulping System at Sulfite Processes

At this time, no Q&A's are provided for this section.

§63.445 Standards for the Bleaching System

At this time, no Q&A's are provided for this section.

§63.446 Standards for Kraft Pulping Process Condensates

Question 1 is contained in volume 1 (September 22, 1999) of the question and answer document.

The NESHAP has three options for collecting condensates: (1) collect all the regulated condensates, (2) collect all the condensates from the HVLC and LVHC collection systems plus the condensate streams that contain 65 percent of the total HAP mass from the remaining regulated streams, and (3) collect a required total HAP mass level from a subset of the regulated condensate streams.

Q2. If I collect and treat the amount of condensates required in the NESHAP, do the condensates from an equipment system (e.g., an extra set of evaporators) that has an intermittent condensate discharge need to be collected? [§63.446(c)]

The response to this question depends on how you are collecting condensates at your mill. The NESHAP (§63.446(c)) contains three options for collecting kraft pulping condensates. One option requires all named

streams to be collected and controlled and the other two options allow a subset of the named streams to be collected and controlled as long as a minimum percent mass or mass level is achieved.

If you choose the first option (§63.446(c)(1)) and collect all the condensates from the regulated streams, then you must collect all the regulated condensate streams, regardless if they are continuous or intermittent discharge. In this case, it does not matter if any of the regulated equipment systems operate with an intermittent discharge of condensates.

If you choose the second option, the percent mass collection option (§63.446(c)(2)), you must account for the HAP contribution of intermittent condensate discharges in determining the percent of total HAP mass loading from the regulated equipment systems. For the percent mass collection option, you must demonstrate that 65 percent of the total HAP mass from the regulated equipment systems is being collected, including any intermittent condensate discharges from regulated equipment systems.

If you choose the third option, the minimum mass collection option (§63.446(c)(3)), you can demonstrate during the initial test that the required total HAP mass is being collected on a continuous basis, then any additional condensate streams (continuous or intermittent) are not required to be collected (see the April 15, 1998 promulgation preamble, 63 FR 18522).

Q3. If I choose to use one of the partial condensate collection options , can I sewer the remainder of the named condensate streams that I do not need to collect? [§63.446(c)(2) and (3)]

The NESHAP specifies three options for determining which kraft pulping process condensate streams must be collected and treated to remove HAPs. Two of these options allow you to collect a subset of the regulated streams provided that you meet a total HAP mass collection requirement

(see §63.446(c)(2) and (3)). As long as you meet one of these condensate collection requirements, no other condensate streams are subject to the NESHAP. For the condensate streams that you are not required to collect, you may handle these streams in any manner (e.g., sewer, recycle) allowable by other applicable permits and laws.

For kraft pulping process condensates, the NESHAP contains five different control requirement options.

Q4. Can I comply by sending the regulated pulping process condensate streams to a closed piece of equipment? [§63.446(e)(1)]

No. The emission requirements for pulping process condensates would not be met if you simply sent the regulated condensates to a closed piece of equipment. As specified in §63.446 (e)(1), you must recycle the condensates to a piece of equipment specified in §63.443(a) that meets the closed vent-collection and control requirements of §63.443(c) and (d).

We do not consider this an acceptable air pollution control option because at the next point that the condensate stream is open to the atmosphere, the HAPs contained in the stream would volatize to the atmosphere. However, if you send the regulated condensates to a closed piece of equipment and the emissions from the next open piece of equipment are captured and controlled according to the pulping system standards of the NESHAP, then the condensate control requirements would be satisfied.

One option offered by the NESHAP for controlling kraft pulping process condensates is to send the condensates to a biological treatment system and meet a percent reduction or mass removal requirement. No mention is made in the NESHAP as to the operator of the biological treatment system.

Q5. If I hardpipe my pulping process condensates to a publicly owned treatment works (POTW), who would be liable if the control requirements of the NESHAP are not met? [§63.446(e)(2)]

The owner or operator of the mill is responsible for complying with the NESHAP. If treatment of the regulated condensates is not directly controlled by the mill owner or operator or if the treatment process is not

owned and operated by the mill (e.g., the condensates are sent off-site for treatment by a second party), an enforceable agreement with the second party charged with treating the condensates would likely be needed. This enforceable agreement must be approved by the permitting authority.

The term "hardpiping" is used here and by industry to refer to the closed collection system used to transport condensates to treatment. Hardpiping systems are essentially leak-free in contrast to open trenches and drains from which HAPs can be emitted to the atmosphere.

Q6. If I am hardpiping regulated and nonregulated pulping process condensate streams to a biological treatment system, can they be mixed together? [§63.446(e)(2)]

You may mix nonregulated condensates with regulated condensates that are being hard piped to a biological treatment system. However, you must first monitor total HAP concentrations in the regulated condensate streams to determine compliance with the condensate collection requirements (§63.446(c)). Once this has been demonstrated, then you can mix them with the non-regulated stream to demonstrate continuous compliance with the treatment requirements of the NESHAP (§63.446(e)).

Only named pulping process condensates at kraft mills have control requirements under this NESHAP. As an example, the large flow rate wastewater streams from bleach plants are not directly required to be controlled.

Q7. If my steam stripper goes off-line temporarily, can I use a biological treatment system to meet the condensate control requirements? [§63.446(e)]

Yes. You may use a biological treatment system to meet the condensate control requirements specified in §63.446(e) of the NESHAP if your system stripper goes off-line. However, if you use a biological treatment system as a backup control when the steam stripper is not operated, then you must prove that the biological treatment system can achieve the emission standards for biological treatment systems. Also, you must also predetermine the monitoring parameter levels for your biological treatment system that ensure continuous compliance with the NESHAP. Then, you must continuously monitor those parameters during all events

Steam stripper systems used to treat kraft pulping process condensates are provided with a 10 percent excess emissions allowance (including periods of startup, shutdown, or malfunctions).

when the biological treatment system is operated as a backup control option. In summary, the backup control device must meet all the requirements that are applicable to the primary control device.

§63.447 Clean Condensate Alternatives

At this time, no Q&A's are provided for this section.

§63.450 Standards for Enclosures and Closed-Vent Systems

A closed-vent system means a system that is not open to the atmosphere and comprises piping, connections, and if necessary, flow inducing devices that transport gas or vapor from an emission point to a control device.

Question 1 is contained in volume 1 (September 22, 1999) of the question and answer document.

Q2. In regards to my closed-vent collection system, what is a bypass line? [§63.450(d)].

In §63.450(d) of the NESHAP, a bypass line refers to any duct, vent, or line connected to the closed-vent collection system that could be used to circumvent the control device and divert vent streams directly to the atmosphere (see the April 15, 1998 promulgation preamble, 63 FR 18530).

Q3. Can I comply with the monitoring requirements for bypass lines by monitoring the position of the bypass valve? [§63.450(d)(1)]

Yes. You may comply with the bypass line flow monitoring requirements in §63.450(d)(1) of the NESHAP by monitoring the position (i.e., open or closed) of the bypass line valve. Section 63.450(d)(1) of the NESHAP states that you must operate a flow indicator that provides a

record of the presence of gas stream flow in the bypass line at least once every 15 minutes.

As stated in the preamble (see 63 FR 18530) to the final rule, the intent of the bypass line monitoring requirements is to prevent circumvention of the control device by venting directly to the atmosphere. We require you to monitor the bypass line for the purpose of detecting gas flow in the bypass line. Monitoring the position (open or closed) of the bypass line valve would satisfy this requirement for a "flow indicator " as long as the owner or operator agrees that the position of the bypass line valve would be used by the permitting authority to determine if the line was used to bypass the control device. The duration of the bypass event (i.e., the valve opening) would be counted against the periods of excess emissions in §63.443(e).

Q 4. May I use a computer to monitor the position of bypass line valves? [§63.450(d)(1)]

Yes. For bypass line valves that are computer controlled, compliance with the flow monitoring requirements in §63.450(d)(1) can be satisfied by using the computer to record the valve position at least once every 15 minutes. However, as stated in the previous question (Q3), the owner or operator must agree that if the valve position is open, then the permitting authority would determine that there was flow in the bypass line.

§63.453 Monitoring Requirements

Question 1 is contained in volume 1 (September 22, 1999) of the question and answer document.

Check the Unified Air Toxics Website (UATW) periodically for additional information regarding averaging times, www.epa.gov/ttn/uatw/pulp/pulppg.html.

Q2. What averaging times should I use to comply with the monitoring requirements of the NESHAP? [§63.453]

You must determine averaging times on a case-by-case basis and they must be approved by the permitting authority. An additional discussion of averaging times is contained in the preamble (64 FR 17558) to the interpretation and technical amendments to the final rule published on April 12, 1999.

The NESHAP does not specify averaging times because appropriate averaging times are dependent on mill specific considerations. Instead, the NESHAP requires that you justify to the permitting authority the rationale for the selected operating parameter value, monitoring frequency, and averaging time. Averaging times and other monitoring information must be based on the initial performance test and the procedures specified in §63.453(n). You are required to include all data and calculations used to develop the parameter value, and a description of why the value, monitoring frequency, and averaging times demonstrate continuous compliance with the applicable emission standard. Therefore, averaging times will be made on a case-by-case basis and must be approved by the permitting authority.

Continuous parameter monitoring is used to ensure that you comply with the NESHAP after performance tests are completed.

Q3. If I use an anaerobic treatment system to treat my pulping process condensates, what do I need to monitor to prove continuous compliance? [§63.453(j)]

The NESHAP does provide monitoring parameters for biological treatment systems in §63.453(j). However, the NESHAP does not define monitoring parameters for anaerobic treatment systems. Appropriate monitoring parameters must be established during the initial performance

test as specified in §63.453(m). The chosen monitoring parameters and data demonstrating they are the appropriate parameters for determining continuous compliance must be submitted to the EPA Administrator for approval. This authority is not delegated to States, as specified in §63.458(b)(2).

§63.454 Recordkeeping Requirements

At this time, no Q&A's are provided for this section.

63.455 Reporting Requirements

At this time, no Q&A's are provided for this section.

§63.457 Test Methods and Procedures

At this time, no Q&A's are provided for this section.

§63.458 Delegation of Authority

At this time, no Q&A's are provided for this section.

Miscellaneous

Resource Conservation and Recovery Act (RCRA)

Q1. Does the RCRA exemption apply to all equipment involved in the processing, handling, and burning of the steam stripper overhead condensates? [§261.4(a)(15)]

Yes. The promulgation package for the final NESHAP contained an amendment to §261.4(a) that added condensates derived from steam stripper overhead gases at kraft mills to the list of materials that are not solid wastes for the purposes of regulation under RCRA. Consequently, the equipment used to process, handle, and burn the condensates are not subject to the RCRA requirements for hazardous solid wastes if all conditions specified in the amendment are met.

If a steam stripper is used to comply with the pulping process condensate standards (§63.446(e)), the steam stripper overhead gases must be sent to a combustion device for destruction. Because the condensate streams are comprised primarily of methanol, a methanol-rich fuel can be obtained by concentrating and condensing (i.e., rectifying) the steam stripper overhead gases. The methanol-rich fuel can then be burned in an on-site combustion device to offset fossil fuel use. However, the concentrated methanol condensate derived from the steam stripper overhead gases may be identified as hazardous waste under the Resource Conservation and Recovery Act (RCRA) because it exhibits the ignitability characteristic (see 40 CFR 261.21). Boilers burning such a hazardous waste fuel would ordinarily be required to comply with emission standards set out in 40 CFR Part 266 Subpart H (the so-called BIF regulation, i.e., standards for boilers and industrial furnaces burning hazardous waste).

In the March 8, 1996 notice (61 FR 9396), we proposed to exclude the practice of rectifying steam stripper overhead gases at kraft mills from

RCRA regulation. As stated in the notice, we do not believe that RCRA regulation of the rectification and combustion of the condensate is appropriate or necessary. The rectification practice would not increase environmental risk, would reduce secondary environmental impacts, and would provide a cost savings. Moreover, the burning of condensate will not increase the potential environmental risk over the burning of the steam stripper vent gases prior to condensation. (See generally 61 FR 9397.)

For these reasons, we excluded specific sources at kraft mills that burn condensates derived from steam stripper overhead vent gases from RCRA, including condensates from the steam stripper methanol rectification process. The amendment to §261.4(a) added condensates derived from steam stripper overhead gases at kraft mills to the list of materials that are not solid wastes for the purposes of regulation under RCRA. Since a hazardous waste (§261.3) must first be defined as a solid waste (§261.2), the amendment prevents condensates from steam stripper overhead vent gases from being regulated as hazardous solid wastes.

The exemption applies only to steam strippers at kraft mills used to comply with the pulping process condensate standards (§63.446(e)). Also, all equipment used to process, handle, and burn condensates from steam stripper overhead vent gases. The scope of the exemption is also limited to kraft mills that generate and burn the condensate streams at the same site. Therefore, if a mill sends steam stripper condensate streams off-site for processing or disposal, or if condensates are spilled or are open to the atmosphere, the condensates are no longer excluded from regulation as a solid waste under RCRA (i.e., the condensates could be determined to have the characteristics of a hazardous waste).

Tall Oil

Q1. Do I have to control emissions from my tall oil recovery system?

No. Kraft mill oil systems are not subject to any requirements under the NESHAP. As stated in the preamble (see 63 FR 18519), we determined that tall oil recovery systems do not emit significant quantities of HAPs and we are not aware of any reasonable technologies for controlling HAPs from this source. This finding was also stated as applicable to wood yard operations; pulping systems at mechanical, secondary fiber, and non-wood fiber mills; and papermaking systems.

White Liquor Scrubbers

Q1. If I use white liquor to remove sulfur compounds from my noncondensible vent gases, do I have to control the tanks that store the used white liquor?

No. We did not have any data regarding emissions from white liquor storage tanks and we did not conduct a MACT determination for these tanks. Additionally, we are not aware of any mills controlling emissions from white liquor storage tanks. Therefore, these tanks are not subject to any requirements under the NESHAP.