

November 6, 1998

MEMORANDUM

TO: Susan J. Richards, Chief
Air Quality Permitting Bureau

FROM: Ray McDougal, Air Quality Engineer 
Air Quality Permitting Bureau

THROUGH: Dan Pitman, Air Quality Permits Manager
Air Quality Permitting Bureau

SUBJECT: ***PERMIT TO CONSTRUCT TECHNICAL ANALYSIS***
P-980110, Potlatch Corp., Pulp & Paperboard/Consumer Products, Lewiston
(Temporary Boilers, Revised PTC #069-00001)

PURPOSE

The purpose of this memorandum is to satisfy the requirements of IDAPA 16.01.01.200 (*Rules for the Control of Air Pollution in Idaho*) for issuing Permits to Construct.

PROJECT DESCRIPTION

Potlatch Corporation in Lewiston was recently issued a Permit to Construct (PTC) for the operation of two temporary boilers at their Lewiston Pulp and Paperboard/Consumer Products facility. These boilers are used as replacements when one of the permanent boilers is shut down. The permit contains an emission rate limit which restricts the operations and disallows the operational flexibility which was intended. This is due to the fact that the emission rate limit was based on the net emission increase due to the operation of the temporary boilers and not actual emissions from the temporary boilers. The emissions are actually limited by the operating requirements in the permit; therefore, a specific emission rate limit is not necessary. Potlatch Corporation has also requested that General Provision E of the permit not be required due to the temporary nature of the equipment.

SUMMARY OF EVENTS

On September 3, 1998, the Idaho Department of Health and Welfare, Division of Environmental Quality (DEQ) issued a PTC to Potlatch Corporation for the operation of temporary boilers. On October 8, 1998, DEQ received a request from Potlatch Corporation to amend the PTC to allow for operational flexibility.

DISCUSSION

1. **Area Classification**

The facility is located in Lewiston, Idaho. Lewiston is in Air Quality Control Region (AQCR) 62 and Zone 11. The area is designated as attainment or unclassifiable for all criteria pollutants.

2. Facility Classification

This facility is an existing major facility as defined in IDAPA 16.01.01.006.54 (*Rules for the Control of Air Pollution in Idaho*). The facility is a designated facility as defined in IDAPA 16.01.01.006.25.c. The standard industrial classification code (SIC) for this facility is 2631 and the facility classification is A1.

3. Emission Estimates

Currently the PTC limits NO_x emissions to 6 tons per year (T/yr). This emission rate is the net emissions increase which will occur given the worst-case operation of the temporary boilers while complying with the operating requirements of the permit. The actual NO_x emissions of these boilers running constantly would be 72.7 T/yr but would have an offset of at least 71.8 T/yr and as much as 842 T/yr. The worst-case operating scenario which the PTC allows is the operation of the temporary boilers for thirty (30) days concurrently with all of the permanent boilers. In this scenario, the NO_x net emissions increase will be 6 T/yr. The intention of the original PTC was not to limit the emissions of the temporary boilers to 6 T/yr, but rather to limit the net emissions increase to that amount.

4. Modeling

A modeling analysis for the original PTC was performed by Potlatch and reviewed by Jay Witt, DEQ Engineer. Additional modeling is not required.

5. Regulatory Review

The following rules and regulations were reviewed for this permit analysis:

<u>IDAPA 16.01.01.006</u>	Significant
<u>IDAPA 16.01.01.201</u>	Permit to Construct
<u>IDAPA 16.01.01.202</u>	Application Procedures

6. Permit Coordination

A copy of this technical analysis will be forwarded to the Operating Permits Section of the Air Quality Permitting Bureau.

7. Fees

Fees apply to this facility in accordance with IDAPA 16.01.01.526 because the facility is a major facility as defined in IDAPA 16.01.01.008.14. According to the 1998 Air Emissions Database Master list, Potlatch has paid fees for approximately 1,588 tons of pollutants required to be registered. This permitting action will not affect the amount of pollutants required to be registered.

8. AIRS Information

An AIRS database entry form was submitted with the original technical analysis for this project.

RECOMMENDATION

Based on review of the application materials and state and federal rules and regulations, staff recommend that Potlatch Corporation be issued a revised PTC for the operation of temporary boilers providing the operational flexibility which was originally intended. It is also recommended that the cover letter for the revised PTC waive the requirement of General Provision E due to the temporary nature of the equipment. No public comment period is recommended, no entity has requested a comment period, and PSD requirements do not apply.

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cc: D. Mehr/AQPB Lewiston RO
P. Rayne/AFS Source File (069-00001)
R. Wilkosz/TSB COF

