



State of Idaho  
Department of Environmental Quality  
Air Quality Division

**AIR QUALITY PERMIT  
STATEMENT OF BASIS**

**Tier I Operating Permit No. T1-2007.0105**

**Clearwater Paper Corporation**

**Consumer Products**

**Lewiston, Idaho**

**Facility ID No. 069-00001**

**January 1, 2010**

A handwritten signature in black ink, appearing to read "Dan Pitman".

**Dan Pitman, P.E.**

**Permit Writer**

The purpose of this Statement of Basis is to set forth the legal and factual basis for the Tier I operating permit terms and conditions including references to the applicable statutory or regulatory provisions for the terms and conditions as required by IDAPA 58.01.01.362

**Final**

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## Table of Contents

ACRONYMS, UNITS AND CHEMICAL NOMENCLATURE .....	3
1. INTRODUCTION AND APPLICABILITY.....	4
2. FACILITY INFORMATION.....	6
3. APPLICATION SCOPE AND APPLICATION CHRONOLOGY.....	6
5. EMISSIONS LIMITS AND MRRR .....	11
6. REGULATORY REVIEW .....	31
7. PUBLIC COMMENT .....	33
8. EPA REVIEW OF PROPOSED PERMIT.....	33
APPENDIX A – AIRS INFORMATION .....	34

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## Acronyms, Units and Chemical Nomenclature

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
gr	grain (1 lb = 7,000 grains)
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
HAPs	Hazardous Air Pollutants
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PC	permit condition
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	Synthetic Minor
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
Tier I	Tier I operating permit
T/yr	tons per year
µg/m <sup>3</sup>	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

### 1. INTRODUCTION AND APPLICABILITY

Clearwater Paper Corporation is a manufacturer of tissue products, and is located in Lewiston, Idaho. The facility is classified as a major facility, as defined by IDAPA 58.01.01.008.10.c, because it emits or has the potential to emit SO<sub>2</sub>, NO<sub>x</sub>, CO, PM<sub>10</sub>, and VOC above the major source threshold of 100 tons-per-year. The facility is also classified as a major facility, as defined by Subsection 008.10.a, because it emits or has the potential to emit hazardous air pollutants above the major source thresholds of 10 tons-per-year for any single HAP and 25 tons-per-year for any combination of HAPs. As a major facility, Clearwater Paper Corporation is required to apply for a Tier I operating permit pursuant to IDAPA 58.01.01.301. Clearwater Paper Corporation's Pulp and Paper Division and the Consumer Products Division are considered one single Tier I major facility. The Clearwater Paper Corporation Tier I permit is issued in two sections, one section is for the Pulp and Paper Division and the other section is for the Consumer Products Division. This Statement of Basis is for the Consumer Products Division of the Clearwater Paper Corporation. The application for a Tier I operating permit must contain a certification from Clearwater Paper Corporation as to its compliance status with all applicable requirements (IDAPA 58.01.01.314.09). Clearwater has certified that they are in compliance.

IDAPA 58.01.01.362 requires that as part of its review of the Tier I application, DEQ shall prepare a technical memorandum (i.e. statement of basis) that sets forth the legal and factual basis for the draft Tier I operating permit terms and conditions including reference to the applicable statutory provisions or the draft denial. This document provides the basis for the draft Tier I operating permit for Clearwater Paper Corporation.

The format of this Statement of Basis follows that of the permit with the exception of the facility's information discussed first followed by the scope, the applicable requirements and permit shield, and finally the general provisions.

Clearwater Paper Corporation's Consumer Products Division Tier I operating permit is organized into sections. They are as follows:

#### **Section 1 – Tier I Operating Permit Scope**

The scope describes this permitting action.

#### **Section 2 – Facility-Wide Conditions**

The Facility-wide Conditions section contains the applicable requirements (permit conditions) that apply facility-wide. Where required, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each permit condition follows the permit condition.

#### **Sections 3 through 5 – Emissions Unit/Source Name**

The emissions unit-specific sections of the permit contain the applicable requirements that specially apply to each regulated emissions unit. Some requirements that apply to an emissions unit (e.g. opacity limits) may be contained in the facility-wide conditions. As with the facility-wide conditions, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each applicable requirement immediately follows the applicable requirement.

**TIER I OPERATING PERMIT STATEMENT OF BASIS**

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

**Section 6 – Non-applicable Requirements and Insignificant Activities**

This section lists those requirements that the applicant has requested as non-applicable, and DEQ proposes to grant a permit shield in accordance with IDAPA 58.01.01.325.

If requested by the applicant, this section also lists emissions units and activities determined to be insignificant activities based on size or production as allowed by IDAPA 58.01.01.317.01.b.

**Section 7 – General Provisions**

The final section of the permit contains standard terms and conditions that apply to all major facilities subject to IDAPA 58.01.01.300. This section is the same for all Tier I sources. These conditions have been reviewed by EPA and contain all terms required by IDAPA 58.01.01 et al as well as requirements from other air quality laws and regulations. Each general provision has been paraphrased so it is more easily understood by the general public; however, there is no intent to alter the effect of the requirement. Should there be a discrepancy between a paraphrased general provision in this statement of basis and the rule or permit, the rule or permit shall govern.

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

### 2. FACILITY INFORMATION

#### 2.1 Facility Description

Clearwater Paper Corporation's Consumer Products Division receives pulp from the Pulp and Paper Division. This pulp is processed into tissue products in the Consumer Products Division. Three tissue machines are used to convert the pulp into tissue, the Valmet Rewinder processes the large tissue rolls into dimensions suitable for final products.

#### 2.2 Facility Permitting History

Underlying Permit History – Includes every underlying permit issued to this facility

The following information is the comprehensive permitting history of all underlying applicable permits issued to this Tier I facility. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A), superseded (S) or expired (E).

July 7, 1975 <sup>1</sup>	Permit No. 069-00011, 3L Tissue Machine, Permit status (S)
August 22, 1984	Air Pollution Source Permit #1140-0001, 1L & 2L Tissue Machines, Permit status (E – See Section 5.2 of this Statement of Basis)
January 4, 1991	PTC No. #1140-0001, 3L Tissue Machine, Permit status (S)
February 28, 1991	PTC No. #1140-0001, 3L Tissue Machine Modification, Permit status (S)
April 12, 1994	PTC No. #1140-0001, 3L Tissue Machine Modification, Permit status (S)
July 7, 1995	PTC No. No. 069-0001, 3L Tissue Machine Modification, Permit status (S)
October 25, 1995	PTC No. No. 069-0001, 3L Tissue Machine Modification, Permit status (S)
December 5, 1997	PTC No. No. 069-0001, 3L Tissue Machine Modification, Permit status (S)
July 7 1998	PTC No. No. 069-0001, 3L Tissue Machine Modification, Permit status (A)
December 17, 2002	T1-060204, Initial Tier I permit (S)
August 18, 2006	T1-060204, Facility Name Change, Potlatch to Potlatch Forest Products, Permit status (S)
December 16, 2008	T1-2008.0181, Facility name change from Potlatch Forest Products to Clearwater Paper Corporation (Superseded by this permit when issued)
June 15, 2009	P-2009.0025, PTC for 1L Tissue Machine Modification, Permit status (A)

### 3. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

#### 3.1 Application Scope

This permit is the renewal of the facility's currently effective Tier I operating permit for the Consumer Products Division. No substantive new applicable requirements were triggered during the existing Tier I permit term which must be included in the renewed Tier I permit.

<sup>1</sup> This permit is mentioned in the Statement of Basis which supports the issuance of the initial Tier I permit (12/17/02), however this permit was not found during the file search for issuance of this Tier I renewal. It should be noted that this permit was superseded by subsequent permits issued to the 3L Tissue Machines.

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

### 3.2 Application Chronology

June 19, 2007	DEQ received Clearwater's Tier I permit renewal application
August 17, 2007	DEQ determined the Tier I permit application incomplete
October 15, 2007	DEQ determined the Tier I permit application complete
March 4, 2008	DEQ received Clearwater's updated application materials regarding CAM applicability to the Tissue Machines and new CAM Plans
July 28, 2009	2 <sup>nd</sup> 30 day Comment Period was held on updated draft permit
August 21, 2009	Clearwater Requested a 30 extension to the comment period. The comment period was extended to September 28, 2009.

### 4. EMISSIONS UNITS, process description(s), and emissions inventory

This section lists the emissions units, describes the production or manufacturing processes, and provides the emissions inventory for this facility. The information presented was provided by the applicant in its permit application. Also listed in this section are the insignificant activities based on size or production rate.

#### 4.1 1L & 2L Tissue Machines

Table 4.1 lists the emissions units and control devices associated with 1L & 2L Tissue Machines which have permit conditions.

**Table 4.1 EMISSION UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION**

Emission Unit ID No.	Emissions Unit Description	Control Device Description (if applicable)	Emissions Discharge Point ID No. or Description
1L-3	1L Tissue Machine	Wet Scrubber Manufacturer: Kleissler Model: SR6040	28a
2L-3	2L Tissue Machine	Wet Scrubber Manufacturer: Kleissler Model: SR6060	52

#### Process Description.

The facility has three tissue machines numbered 1L, 2L and 3L. This section of the permit is for the 1L and 2L Tissue Machines. Each tissue machine includes equipment for mixing pulp or other raw materials with water; treating it chemically and mechanically to impart desired properties; forming the mixture into a sheet; pressing some of the water out mechanically; drying the sheet via steam heat air; mechanical treatment including but not limited to calendering and slitting; and rolling into larger rolls for storage.

#### 4.2 3L Tissue Machine & Valmet Rewinder

Table 4.2 lists the emissions units and control devices associated with 3L Tissue Machine which have permit conditions.

**TIER I OPERATING PERMIT STATEMENT OF BASIS**

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

**Table 4.2 EMISSION UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION**

<b>Emission Unit ID No.</b>	<b>Emissions Unit Description</b>	<b>Control Device Description (if applicable)</b>	<b>Emissions Discharge Point ID No. or Description</b>
3L-3	3L Tissue Machine	Wet Scrubber Manufacturer: Kleissler Model: SR6060	2
C-1	Valmet Rewinder	Wet Scrubber Manufacturer: Kleissler Model: SR 6025	56

Process Description.

The facility has three tissue machines numbered 1L, 2L and 3L. This section of the permit includes the 3L tissue machine. Each tissue machine includes equipment for mixing pulp or other raw materials with water; treating it chemically and mechanically to impart desired properties; forming the mixture into a sheet; pressing some of the water out mechanically; drying the sheet via steam heat air; mechanical treatment including but not limited to calendering and slitting; and rolling into larger rolls for storage.

The Valmet rewriter processes large rolls of tissue produced in the Tissue Machines into sizes suitable for consumer products.

**4.3 Printing**

Table 4.3 lists the emissions units and control devices associated with CPD printing process.

**Table 4.3 EMISSION UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION**

<b>Emission Unit ID No.</b>	<b>Emissions Unit Description</b>	<b>Control Device Description (if applicable)</b>	<b>Emissions Discharge Point ID No. or Description</b>
C-2	CPD Printing Operations	None	66

Process Description.

Consumer Products Division conducts wide-web flexographic printing on several pieces of equipment in the facility as defined in 40 CFR Part 63 Subpart KK. There are 4 affected sources. Two household towel production lines have wide-web flexographic printing presses with associated work station which apply laminating adhesive and water-based links on the substrate. The Off-line slitting rewriter has a flexographic printing station and there is one KD printer for flexographic printing of knock-down corrugated shipping container. All ink and adhesive consumption is tracked monthly along with HAP and VOC content, if applicable.

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

### 4.4 Temporary Boilers

Clearwater Paper Corporation has been issued a permit to construct for temporary boilers (PTC No. 069-00001, 11/6/98). The requirements from this PTC had been included in both the Pulp and Paper Division and Consumer Products Division sections of the Tier I permit. To avoid unnecessary duplication the renewed Tier I permit only includes the requirements for the temporary boilers in the Pulp and Paper Division Section of the Tier I permit.

### 4.5 Insignificant Emissions Units Based on Size or Production Rate

No emissions unit or activity subject to an applicable requirement may qualify as an insignificant emissions unit or activity at the Consumer Products Division. As required by IDAPA 58.01.01.317.01.b, insignificant emissions units (IEU's) based on size or production rate must be listed in the permit application. Table 4.4 lists the IEU's identified in the permit application. Also summarized is the regulatory authority or justification for each IEU.

**Table 4.4 INSIGNIFICANT EMISSION UNITS AND REGULATORY AUTHORITY/JUSTIFICATION**

Emissions Unit/Activity	Regulatory Authority/Justification
Portable propane fired sump pumps	317.b.18
Space heat "salamanders" 150,000 Btu/hr	317.b.18
3L Diesel Basement Exhaust (112 Hp)	317.b.7
1L Yankee popoff relief silencer	317.b.19
Acid vent lines	317.b.18
Welding shop heaters (2 units)	317.b.5
Heater at Napkins Area (2 units)	317.b.5
Air washer Sump Room Heater	317.b.18
Old warehouse heaters (17 heaters)	317.b.18
2L Backup Sump Pump (112 Hp)	317.b.7
2L Air Makeup Unit (3)	317.b.30
2L Machine roof recirculation unit	317.b.5
3L Air Makeup Unit (4)	317.b.30
1L Diesel Backup Sump Pump (112 Hp)	317.b.7
1L Roof Recirculation unit	317.b.5
Backup diesel compressor (400 Hp)	317.b.30
Backup diesel generator (2250 Hp)	317.b.30
Sulfuric Acid Tank (93% solution)	317.b.19
Sodium Hypochlorite tank (6% solution)	317.b.19
Propane Storage Tanks (2)	317.b.4

### Non-applicable Requirements for Which a Permit Shield is Requested

The facility has not requested a permit shield pursuant to IDAPA 58.01.01.325.b for non-applicable requirements.

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

### 4.6 Emissions Inventory

Table 4.1 summarizes the emissions inventory for this major facility. All values are expressed in units of tons-per-year and represent the facility's potential to emit. Potential to emit is defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hour of operation or on the type or amount of material combusted, stored or processed shall be treated as part of its design if the limitation or the effect it would have on emission is state or federally enforceable.

The documentation provided by the applicant for the Consumer Products Division emissions inventory and emission factors is provided in Appendix B of the June 19, 2007 application Submitted by Clearwater.

**Table 4.1 Clearwater Paper Corporation Potential to Emit Summary<sup>1</sup>**

Source	PM <sub>10</sub> (T/yr)	SO <sub>2</sub> (T/yr)	CO (T/yr)	NO <sub>x</sub> (T/yr)	VOC (T/yr)	HAP (T/yr)
1 L Tissue Machine Process Combustion Emissions <sup>2</sup>					1.2	
1 L Tissue – Hood Burner	0.59	0.046	6.5	0.43	0.43	
1 L Tissue Machine – Wet Scrubber	0.53					
2 L Tissue Machine Process Combustion Emissions					3.0	
2 L Tissue – Hood Burner <sup>2</sup>	1.4	0.11	15	1.8	1.0	
2 L Tissue Machine – Wet Scrubber	2.1					
3 L Tissue Machine Process Combustion Emissions <sup>2</sup>					3.0	
3 L Tissue – Hood Burner	1.1	0.086	12	28	0.79	
3 L Tissue Machine – Wet Scrubber	6.4					
Valmet Rewinder	3.2					
Road Fugitives	15					
Printing					11	
<b>Total – Consumer Products Div.</b>	<b>30.32</b>	<b>0.242</b>	<b>33.5</b>	<b>30.23</b>	<b>20.4</b>	
<b>Total – Pulp and Paper Div.</b>	<b>803.0</b>	<b>1535.9</b>	<b>5855.6</b>	<b>2161.0</b>	<b>596.0</b>	
<b>Facility Total</b>	<b>833.3</b>	<b>1536.1</b>	<b>5889.1</b>	<b>2191.2</b>	<b>616.4</b>	<b>&gt; 25<sup>1</sup></b>

1) The facilities potential emit HAP is greater than 10 tons per year for any individual HAP and greater than 25 tons per year for all HAPs combined. It is not necessary to determine the exact PTE for Tier I permitting purposes; it is only necessary to determine if any individual HAP is greater than 10 tons per year and whether combined HAPs are greater than 25 tons per year. Individual HAP emissions exceed 10 tons per year and the combination of all HAPs emitted is greater than 25 tons per year. As an example the applicant estimated emissions of methanol from the wastewater treatment lagoon at the Pulp and Paper Division to be 230 tons per year – the majority of the HAPs are emitted at the Pulp and Paper Division.

2) Clearwater only provided an emission inventory for VOC emissions from these combustion sources. Other criteria air pollutants will be emitted but are insignificant in determining the facilities potential to emit.

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

### 5. EMISSIONS LIMITS AND MRRR

This section contains the applicable requirements for this major facility. Where applicable, monitoring, recordkeeping and reporting requirements (MRRR) follow the applicable requirement and state how compliance with the applicable requirement is to be demonstrated.

This section is divided into several subsections. The first subsection lists the requirements that apply facility wide. The next subsection emissions units- and emissions activities-specific applicable requirements. The final subsection contains the general provisions that apply to all major facilities subject to Idaho DEQ's Tier I operating permit requirements.

This section contains the following subsections:

- Facility-Wide Conditions;
- 1L and 2L Tissue Machine Emissions Limits;
- 3L Tissue Machine and Valmet Rewinder Emissions Limits;
- Printing Process Emissions Limits;
- Compliance Assurance Monitoring (CAM) requirements; and
- Tier I Operating Permit General Provisions.

#### ***MRRR***

Immediately following each applicable requirement (permit condition) is the periodic monitoring regime upon which compliance with the underlying applicable requirement is demonstrated. A periodic monitoring regime consists of monitoring, recordkeeping and reporting requirements for each applicable requirement. If an applicable requirement does not include sufficient monitoring, recordkeeping and reporting to satisfy IDAPA 58.01.01.322.06, 07, and 08, then the permit must establish adequate monitoring, recordkeeping and reporting sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit. This is known as gap filling.

The discussion of each permit condition includes the legal and factual basis for the permit condition. If a permit condition was changed due to facility draft or public comments, describe why and how the condition was changed. See instructions on the cover page for Appendix D for other options.

#### ***State Enforceability***

An applicable requirement that is not required by the federal CAA and has not been approved by EPA as a SIP-approved requirement is identified as a "State-only" requirement and is enforceable only under state law. State-only requirements are not enforceable by the EPA or citizens under the CAA. State-only requirements are identified in the permit within the citation of the legal authority for the permit condition.

#### ***Federal Enforceability***

Unless identified as "State-only", all applicable requirements, including MRRR, are state and federally enforceable. It should be noted that while a violation of a MRRR is a violation of the permit, it is not necessarily a violation of the underlying applicable requirement (e.g. emissions limit).

To minimize the length of this document, the MRRR for the facility-wide permit conditions has been

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

paraphrased. Refer to the permit for the complete requirement.

### 5.1 Facility-wide Conditions

#### Permit Condition 2.1 – Fugitive Dust

All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 3/30/07]

#### MRRR (Permit Conditions 2.2 through 2.4)

- Monitor and maintain records of the frequency and the methods used to control fugitive dust emissions;
- Maintain records of all fugitive dust complaints received and the corrective action taken in response to the complaint;
- Conduct a monthly facility-wide inspection of all sources of fugitive emissions. If any of the sources of fugitive dust are not being reasonably controlled, corrective action is required.
- Records of each fugitive dust inspection and corrective action taken are to be maintained at the permitted facility.

[IDAPA 58.01.01.322.06, 07, 08, 4/5/2000]

#### Permit Condition 2.5 – Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776 (State-only), 5/1/94]

#### MRRR (Permit Condition 2.6)

- Maintain records of all odor complaints received and the corrective action taken in response to the complaint;
- Take appropriate corrective action if the complaint has merit, and log the date and corrective action taken.

[IDAPA 58.01.01.322.06, 07 (State-only), 5/1/94]

#### Permit Condition 2.7 – Visible Emissions

The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

#### MRRR (Permit Condition 2.8)

- Conduct a monthly facility-wide inspection during daylight hours and under normal operating conditions for the purposes of observing points of visible emissions from all emissions units

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

subject to the visible emissions standards.

- Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition.
- Each inspection shall be conducted as follows:
  - Initial see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:
    - Take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions, and conduct another see/no see evaluation within 24 hours. If the visible emissions are not eliminated, the permittee shall comply with b).

**OR**

- Perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. If the measured opacity is greater than 20% for the time period specified in Section 625, the permittee shall take corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.
- Records of each visible emission inspection and each opacity test and corrective action taken are to be maintained.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

### **Permit Condition 2.9 – Excess Emissions**

The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between Permit Condition 2.9 and the regulations of IDAPA 58.01.01.130-136.

### **MRRR**

Monitoring, recordkeeping and reporting requirements for excess emissions are provided in Sections 131 through 136.

### **Permit Condition 2.10 – Performance Testing**

If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used

**TIER I OPERATING PERMIT STATEMENT OF BASIS**

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

Unless a different time period is approved by DEQ, the permittee shall submit a compliance test report for the respective test to DEQ within 30 days following the date in which a compliance test required by this permit is concluded. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the following address:

Air Quality Permit Compliance  
Department of Environmental Quality  
Lewiston Regional Office  
1118 F St.  
Lewiston, ID 83501

Phone: (208) 799-4370 Fax: (208) 799-3451

**[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]**

**MRRR**

No monitoring is required for this facility-wide condition. As with all permit conditions, Clearwater Paper Corporation must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

However, if performance testing is required, it is to be conducted in accordance with IDAPA 58.01.01.157, including any and all monitoring, recordkeeping and reporting requirements. Emissions-unit specific MRRR will be listed within the permit condition requiring performance testing permit condition.

**Permit Condition 2.11 – Monitoring and Recordkeeping**

The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

**[IDAPA 58.01.01.322.07, 5/1/94]**

**TIER I OPERATING PERMIT STATEMENT OF BASIS**

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

**MRRR**

No monitoring is required for this facility-wide condition. As with all permit conditions, Clearwater Paper Corporation must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

**Permit Condition 2.12 – Reports and Certifications**

All periodic reports and certifications required by this permit shall be submitted to DEQ within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Reports, certifications, and notifications shall be submitted to:

Air Quality Permit Compliance  
Department of Environmental Quality  
Lewiston Regional Office  
1118 F St.  
Lewiston, ID 83501  
Phone: (208) 799-4370 Fax: (208) 799-3451

The periodic compliance certification required by General Provision 21 shall also be submitted within 30 days of the end of the specified reporting period to:

EPA Region 10  
Air Operating Permits, OAQ-107  
1200 Sixth Ave.  
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 5/1/94]

**MRRR**

No monitoring is required for this facility-wide condition. As with all permit conditions, Clearwater Paper Corporation must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

**Permit Condition 2.13 – Fuel Burning Equipment PM Standards**

The permittee shall not discharge PM to the atmosphere from any fuel-burning equipment in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[IDAPA 58.01.01.676-677, 5/1/94]

**MRRR**

No monitoring is required for this facility-wide condition. As with all permit conditions, Clearwater

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

Paper Corporation must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

### **Permit Condition 2.14 – Distillate Fuel Oil Sulfur Content Limits**

The permittee shall not sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 1 fuel oil - 0.3% by weight.
- ASTM Grade 2 fuel oil - 0.5% by weight.

[IDAPA 58.01.01.728, 5/1/94]

### **MRRR – (Permit Condition 2.14.1)**

The permittee shall maintain documentation of supplier verification of distillate fuel oil sulfur content on an as-received basis.

[IDAPA 58.01.01.322.06, 5/1/94]

### **Permit Condition 2.15 – Open Burning**

The permittee shall comply with the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-616.

[IDAPA 58.01.01.600-616, 3/30/07]

### **MRRR**

No monitoring is required for this facility-wide condition. As with all permit conditions, Clearwater Paper Corporation must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

### **Permit Condition 2.16 – Asbestos**

The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

### **MRRR**

No monitoring is required for this facility-wide condition except as applicable under 40 CFR 61 Subpart M. As with all permit conditions, Clearwater Paper Corporation must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

### **Permit Condition 2.17 – Regulated Substances for Accidental Release Prevention**

An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

- The date on which a regulated substance is first present above a threshold quantity in a process.

**[40 CFR 68.10 (a)]**

*And*

This facility is subject to 40 CFR Part 68 and shall certify compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by 40 CFR 70.6(c)(5).

**[40 CFR 68.215(a)(2); IDAPA 58.01.01.322.11, 5/1/94; 40 CFR 68.215(a)(ii)]**

### **MRRR**

No monitoring is required for this facility-wide condition except as applicable under 40 CFR Part 68. As with all permit conditions, Clearwater Paper Corporation must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

### **Permit Condition 2.18 – Recycling and Emissions Reductions**

The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

**[40 CFR 82, Subpart F]**

### **MRRR**

No monitoring is required for this facility-wide condition, except as applicable under 40 CFR 82 Subpart F. As with all permit conditions, Clearwater Paper Corporation must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

### 5.2 Emissions Unit-specific Emissions Limits and MRRR

#### Tier I Permit Section 3 – 1L & 2L Tissue Machines

The facility has three tissue machines numbered 1L, 2L and 3L. This section of the permit is for the 1L and 2L tissue machines. Each tissue machine includes equipment for mixing pulp or other raw materials with water; treating it chemically and mechanically to impart desired properties; forming the mixture into a sheet; pressing some of the water out mechanically; drying the sheet via steam heat air; mechanical treatment including but not limited to calendering and slitting; and rolling into larger rolls for storage.

There is only one underlying permit which has requirements that are applicable. That permit is the PTC No. P-2009.0025 issued June 15, 2009 for modification to the 1L Tissue Machine and is included in the Tier I permit without change..

Tier I requirements for the for the 1L and 2L Tissue Machines were in Section 2 of the existing Tier I permit they are now in Section 3 of the renewed Tier I permit.

The August 22, 1984 Air Pollution Source Permit No. 1140-0001 which expired August 21, 1989 is discussed in the following paragraphs. Even if the August 22, 1984 permit had not expired all of the permit conditions for the 1L and 2L tissue machines would be obsolete or redundant and would not have been included in the Tier I permit.

#### **Air Pollution Source Permit, No. 1140-0001, 8/22/84**

Page 28 of the 8/22/84 Air Pollution Source Permit No. 1140-0001 included the requirements for the 1L and 2L Tissue Machines. Following are discussions regarding each of these expired permit requirements.

#### Permit Section 1. Emissions Limits

Permit Condition 1.1.of the permit limits opacity to 20% in accordance with IDAPA 58.01.01.625. This requirement is included in Facility-Wide permit condition 2.7 of the renewed Tier I permit.

Permit Condition 1.2 limits particulate matter emissions to requirements of the process weight rate emissions limitation of IDAPA 58.01.01.702. This requirement is included in renewed Tier I permit condition 3.1.

#### Permit Section 2. Monitoring and Operation Requirements

Permit Condition 2.1 of the underlying permit required reasonable control of fugitive dust. This requirement is included in Facility-Wide Permit Condition 2.1 of the renewed Tier I permit.

Permit Condition 2.2 of the permit specified that DEQ may require PM emissions testing if the facility “consistently violates the opacity limit” in order to determine compliance with process weight rate emissions limits. This permit condition is obsolete and is not included in the Tier I permit. Clearwater

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

has not reported any opacity violations during the term of the existing Tier I permit and the terms “consistently violates the opacity limit” is an impractical permit condition because its meaning is subject to many interpretations. Should Clearwater violate the opacity standards they would be subject to DEQ’s compliance process to resolve violations.

Permit Condition 2.3 required that visible emissions be observed once per quarter. Facility-Wide Permit Condition 2.8 is more stringent requiring monthly observations.

### Permit Section 3. Reporting Requirements

Permit condition 3.1 required submitting the results of performance tests within one month of the test. Facility-Wide Permit Condition 2.10 includes this requirement.

Permit Condition 3.2 stated, “All reports shall verify operation of this equipment which necessitates a visible emissions observation”. This permit condition was practically unenforceable because what it was actually requiring can not be ascertained. It is noted that visible emissions observations are required monthly by Facility-Wide Permit Condition 2.8, that excess emissions shall be reported in accordance with Facility-Wide Permit Condition 2.9.4, and that Facility-Wide Permit Condition 2.11 requires maintaining documentation of all visible emissions observations.

In summary all the 8/22/84 permit conditions which expired 8/21/09 for the 1L and 2L tissue machines would have been determined obsolete or redundant even if the permit had not expired.

### **NEW TIER I PERMIT CONDITIONS**

PTC No. P-2009.0025 issued June 15, 2009 for the modifications to the 1L Tissue Machine have been included in the Tier I operating permit.

### **EXISTING TIER I PERMIT CONDITIONS THAT ARE REDUNDANT, REMOVED OR AMENDED**

#### Existing Tier I Permit Condition 2.2

Existing Tier I Permit Condition 4.2 limits opacity to 20% in accordance with IDAPA 58.01.01.625. This permit condition is a duplicate of Facility-Wide Permit Condition 2.7 and has been removed from the renewed Tier I permit.

#### Existing Tier I Permit Condition 2.3

Existing Tier I Permit Condition 2.3 required monthly observations of visible emissions; it also specified that if 4 consecutive readings were below 20% opacity visible emissions observation could revert to quarterly instead of monthly. However, existing Tier I Permit Condition 1.8 requires monthly observations in addition to this requirement, thereby negating the quarterly visible emissions observation option. Existing Tier I Permit Condition 2.3 has been removed from the renewed permit.

#### Existing Tier I Permit Condition 2.4

Existing Tier I Permit Condition 2.4 required that an operations and maintenance (O&M) manual be developed for the scrubbers that control emissions from the 1L and 2L Tissue Machines. This permit condition was cited to be a State Only permit condition and to have authority from IDAPA 58.01.01.322.01. Though a permit condition can not be “state only” and be cited to have its authority

**TIER I OPERATING PERMIT STATEMENT OF BASIS**

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

from IDAPA 58.01.01.322.01 – the two citations contradict each other. The citation to the authority for this permit condition has been amended to be solely IDAPA 58.01.01.322.01.

This permit condition was deleted entirely from the draft Tier I permit that was made available for public comment on February 2, 2009. The rationale for deleting this permit condition from the February 2, 2009 draft permit was that CAM requirements were in place in the draft permit which obsoleted the need for an O&M manual. However, based on Clearwater’s comments on the draft permit, CAM has been removed from the permit (See Section 6.6 of this Statement of Basis). Because CAM has been removed from the permit it is necessary to have “...operational requirements and limitations that assure compliance with the applicable requirements...” (IDAPA 58.01.01.322.01) therefore in absence of the facility providing a means of determining ongoing compliance the requirement to develop an O&M manual, as required in the existing Tier I permit, has been reinserted into Tier I permit 3.2. Maintaining and properly operating a wet scrubber will reasonably assure compliance with the emission limits which are the process weight rate emissions standards of IDAPA 58.01.01.702.

The remaining existing Tier I permit requirements are unchanged but may have been renumbered in the renewed Tier I permit.

**SUMMARY OF SECTION 3 OF THE RENEWED TIER I PERMIT**

Table 5.1 lists each emissions standard and operating requirement for the 1L and 2L Tissue Machines which originates from the Rules or the underlying PTC No. P-2009.0025 issued June 15, 2009. The table also references and/or describes the monitoring requirements that are included in the renewed Tier I permit to assure compliance with each standard or operating requirement.

**Table 5.1 Applicable Requirements/Compliance Assurance Summary**

<b>Permit Condition</b>	<b>Requirement</b>	<b>Requirement Reference</b>	<b>Monitoring and Recordkeeping Requirements</b>	<b>Summary of Compliance Assurance Method</b>
3.1	PM – Process weight rate emissions limits	IDAPA 58.01.01.702	Facility Wide Permit Condition 2.11 - The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating permit.	Scrubber operating requirements included in Permit Condition 3.2 & 3.3

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

### Tier I Permit Section 4 – 3L Tissue Machine

The facility has three tissue machines numbered 1L, 2L and 3L. This section of the permit is for the 3L tissue machine. Each tissue machine includes equipment for mixing pulp or other raw materials with water; treating it chemically and mechanically to impart desired properties; forming the mixture into a sheet; pressing some of the water out mechanically; drying the sheet via steam heat air; mechanical treatment including but not limited to calendering and slitting; and rolling into larger rolls for storage.

There is only one underlying permit which has requirements that are applicable to the 3L Tissue Machine. That permit is Permit to Construct No. 069-0001 which was issued July 7, 1998. Tier I requirements for the for the 3L Tissue Machine were in Section 3 of the existing Tier I permit they are now in Section 4 of the renewed Tier I permit.

#### Permit to Construct, No. 069-0001, 7/7/98

Following are discussions regarding each of these underlying permit requirements and how they are addressed in the renewed Tier I Operating Permit.

#### 1. EMISSIONS LIMITS –

Section 1 of the underlying permit limits emissions from the following equipment:

- 1.1 3L Tissue Machine Dust Scrubber Stack
- 1.2 3L Tissue Machine Yankee Dryer Stack
- 1.3 Valmet Rewinder Dust Scrubber Stack

The pound per hour and ton per year emissions limits included in these underlying Permit Conditions are included in renewed Tier I Permit Condition 4.1 as they appear in the existing Tier I permit with the exception that the averaging period of the limits has been clarified. The underlying permit permit also includes the 20% opacity limit of IDAPA 58.01.01.625; these opacity limitations are consolidated and are included in Facility-Wide Permit Condition 2.7.

#### 2. OPERATING REQUIREMENTS –

Permit Conditions 2.1 and 2.2 of the underlying permit include operating requirements for the 3L Tissue Machine Dust Scrubber and the Valmet Rewinder respectively. The first 3 subsections of these Permit Conditions include identical requirements for 3L Tissue Machine Dust Scrubber and the Valmet Rewinder. Rather than repeat these requirements in each Permit Condition the Tier I permit consolidates these requirements into renewed Tier I Permit Conditions 4.2, 4.3, and 4.4.

Subsection 2.1.4 of the underlying permit limits the input capacity of the 3L tissue machines hood burners to 47 MMBtu/hr. This requirement is included in renewed Tier I Permit Condition 4.5.

Permit Condition 2.3 requires that the permittee install, calibrate and maintain devices for the continuous measurement of press drop and scrubbing media flow rate for the 3L Tissue Machine Dust Scrubber and Valmet Rewinder Dust Scrubber. Permit Condition 2.3 of the underlying permit is subdivided into 2 subsections for the 3L Tissue Machine Dust Scrubber and 2 subsections for the

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

Valmet Rewinder Dust Scrubber. The 2 subsections for the 3L Tissue Machine Dust Scrubber and the 2 subsections for the Valmet Rewinder Dust Scrubber are identical. Rather than repeat the identical requirements the requirements for the 3L Tissue Machine Dust Scrubber and the Valmet Rewinder Dust Scrubber have been consolidated in renewed Tier I Permit Conditions 4.6 and 4.7.

### 3. MONITORING AND RECORDKEEPING REQUIREMENTS –

Permit Condition 3.1 of the underlying permit included monitoring requirements for the 3L Tissue Machine Dust Scrubber, and Permit Condition 3.2 includes identical monitoring requirements for the Valmet Rewinder Dust Scrubber. Rather than repeat these requirements for each scrubber they have been consolidated and included in renewed Tier I Permit Condition 4.8. The draft Tier I permit that was made available for public comment inadvertently omitted the underlying requirement to monitor the gas feed rate to the 3L Tissue Machine, this requirement has now been included in the Tier I permit.

Permit Condition 3.3 of the underlying permit requires monitoring the time periods when the emissions control devices are operating under upset conditions, etc. This requirement is included in renewed Tier I Permit Condition 4.9.

Permit Conditions 3.4 through 4.5 are specific to requirements for initial source tests that were to occur within 180 days after startup. The initial source tests have been conducted therefore these permit conditions are obsolete and are not included in the renewed Tier I permit.

### EXISTING TIER I PERMIT CONDITIONS THAT ARE REDUNDANT OR REMOVED

#### Existing Tier I Permit Condition 3.2

Existing Tier I Permit Condition 3.2 included the opacity standard of IDAPA 58.01.01.625. This permit condition is redundant with Facility-Wide Permit Condition 2.7 and has been removed.

#### Existing Tier I Permit Condition 3.9

Existing Tier I Permit Condition 3.9 specifies visible emissions observations frequencies. In accordance with this permit condition the minimum allowable frequency of visible emissions observations is quarterly. However, existing Facility-Wide Permit Condition 1.8 requires monthly visible emissions observations. Existing Tier I permit condition 3.9 is less stringent than existing Facility-Wide Permit Condition 1.8. Renewed Tier I Facility-Wide Permit Condition 2.8 now includes the sole visible emissions monitoring requirement for the 3L Tissue Machine.

#### Existing Tier I Permit Condition 3.13

Existing Tier I Permit Condition 3.13 specified procedures on how to establish new scrubbing media flow rate and pressure drop limitations for the 3L Tissue Machine scrubber. These conditions are not included in the renewed Tier I permit because these requirements not in the underlying permit. The underlying permit did not provide any description on how to establish new scrubbing media flow rate and pressure drop limitations for the 3L Tissue Machine scrubber. The current Tier I permit erroneously cites these conditions as having originated from PTC No. 069-00001.

**TIER I OPERATING PERMIT STATEMENT OF BASIS**

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

**NEW OR AMENDED PERMIT CONDITONS**

Existing Tier I Permit Condition 3.1

Existing Tier I permit condition includes a table of emission rate limits for the 3L Tissue machine and for the Valmet Rewinder exactly as they appear in the existing Tier I permit. However, emission limits had been given in pounds per hour and tons per year without discussion on the appropriate averaging periods for these standards. Footnotes have been added to the table of emission rate limits to define the averaging period of the limits, the limits themselves remain unchanged. With regard to the averaging period of all pounds per hour emission rate limits for which there is corresponding source testing requirement, the averaging period is determined by emissions testing conducted in accordance with IDAPA 58.01.01.157. All ton per year emissions limits are emission rate limits per any consecutive 12-month period.

**Table 5.2 Applicable Requirements/Compliance Assurance Summary**

Permit Condition	Requirement	Requirement Reference	Monitoring and Recordkeeping Requirements	Summary of Compliance Assurance Method
4.1	3L Tissue – Point 2 PM – 1.6 lb/hr; 7.1 T/yr PM <sub>10</sub> - 1.5 lb/hr; 6.4 T/yr	PTC No. 069-00001, 7/7/98	Scrubbing media flow rate and scrubber pressure drop in accordance Permit Conditions 4.6 & 4.7	Pressure drop and scrubbing media flow rate limits (Permit Conditions 4.2& 4.3
	3L Tissue Hood Exhaust – Point 12 PM – 1.4 lb/hr; 6.1 T/yr NOx – 6.3 lb/hr; 28 T/yr	PTC No. 069-00001, 7/7/98	Monitor natural gas combustion rate (Permit Condition 4.8)	Permit Condition Limits Hood Burners to less than 47 MMBtu/hr rated input capacity. Combusting natural gas at this rate assures compliance with emission limits – AP-42 emissions factors in conjunction with this input capacity assures compliance.
	Valmet Rewinder – Point 56 PM – .83 lb/hr; 3.6 T/yr PM <sub>10</sub> - .74lb/hr; 3.2 T/yr	PTC No. 069-00001, 7/7/98	Scrubbing media flow rate and scrubber pressure drop in accordance Permit Conditions 4.6 & 4.7	Pressure drop and scrubbing media flow rate limits (Permit Conditions 4.2& 4.3

**Tier I Permit Section 5 – Printing**

The Consumer Products Division conducts wide-web flexographic printing on several pieces of equipment in the facility as defined in 40 CFR Part 63, Subpart KK, the printing and publishing industry NESHAPs. There are 4 affected sources consisting of all wide-web flexographic printing presses. Two household towel production lines have wide-web flexographic printing presses with a associated work station which apply laminating adhesive and water-based inks on the substrate. The Off-line slitting rewinder has a flexographic printing station and there is one KD printer for flexographic printing of knock-down corrugated shipping containers. All ink and adhesive consumption is tracked monthly along with HAP and VOC content, as applicable.

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

There is not emission-capture or control equipment associated with any of these printing stations. Any organic HAP emitted would be expected to eventually leave the building via the HVAC system. As described in detail in Section 6.6 of this statement of basis Clearwater has proposed to comply with the NESHAP requirements for the printing processes by limiting the total of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied to less than 500 kilograms per month; or by limiting the amount of organic HAP applied to less than 400 kg per month.

The requirements of 40 CFR Part 63, Subpart KK applicable to the Consumer Products Division, described in detail in Section 6.6 of this statement of basis, are included in the existing Tier I permit.

### NEW OR AMENDED PERMIT CONDITIONS

#### Existing Tier I Permit Condition 4.4

The intent of existing Tier I Permit Condition 4.4 was to include the applicable reporting requirements of 40 CFR 63, Subpart KK which (discussed in Section 6.6 of this Statement of Basis). In summary, Subpart KK specifies that for facilities which comply by limiting the amount of HAP containing inks (etc.), as Clearwater is, the reporting requirements of 40 CFR 63.9 (b) apply. Existing Tier I Permit has been rewritten to include the applicable reporting requirements of 40 CFR 63.9 (b) which do apply. The requirements are now included in Section 5 of the permit instead of Section 4.

#### New Permit Condition 5.4

5.4 The owner or operator of a new or reconstructed affected source shall comply with the initial notification requirements of 40 CFR 63.9(b).

[40 CFR 63.9(b)]

#### New Permit Condition 5.5

5.5 Should there be a conflict between any condition included in Section 5 of this permit and 40 CFR 63 Subpart KK, 40 CFR 63 Subpart KK shall govern.

The sole purpose of Section 5 of the permit is to incorporate the applicable requirements of 40 CFR 63 Subpart KK. New permit condition 5.5 has been included in the renewed Tier I permit to make clear that if there is conflict between Section 5 of the permit and 40 CFR 63 Subpart KK, 40 CFR 63 Subpart KK shall govern.

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

### **Tier I Permit Section 6 of Draft Permit – Compliance Assurance Monitoring (CAM)**

The draft permit that was made available for public comment on February 2, 2009 included CAM requirements in Section 6. The CAM requirements were based on Clearwater's June 19, 2007 CAM Plan. Clearwater's comments provided during the public comment period included a new uncontrolled emission inventory of less than 100 tons per year for PM/PM-10, which is below the CAM applicability threshold of 100 tons per year. Based on this new emission inventory Clearwater requested that CAM requirements be removed from the permit. Since uncontrolled emissions are less than 100 tons per year DEQ has removed CAM requirements from the Tier I permit. See Section 6.6 of this Statement of Basis for more discussion on CAM applicability.

### **5.3 General Provisions**

Unless expressly stated, there are no MRRR for the general provisions.

#### **General Provision 1 – General Compliance, Duty to Comply**

The permittee must comply with the terms and conditions of the permit.

[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]

#### **General Provision 2 – General Compliance, Need to Halt or Reduce Activity Not a Defense**

The permittee cannot use the fact that it would have been necessary to halt or reduce an activity as a defense in an enforcement action.

[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]

#### **General Provision 3 – General Compliance, Duty to Supplement or Correct Application**

The permittee must promptly submit such supplementary facts or corrected information upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application. The permittee must also provide information as necessary to address any new requirements that become applicable after the date a complete application has been filed but prior to the release of a draft permit.

[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

#### **General Provision 4 – Reopening, Additional Requirements, Material Mistakes, Etc.**

This term lists the instances when the permit must be reopened and revised, including times when additional requirements become applicable, when the permit contains mistakes, or when revision or revocation is necessary to assure compliance with applicable requirements.

[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99;  
40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]

#### **General Provision 5 – Reopening, Permitting Actions**

This term discusses modification, revocation, reopening, and/or reissuance of the permit for cause. If

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

Clearwater Paper Corporation files a request to modify, revoke, reissue, or terminate the permit, the request does not stay any permit condition, nor does notification of planned changes or anticipated noncompliance.

[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

### General Provision 6 – Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege.

[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

### General Provision 7 – Information Requests

The permittee must furnish, within a reasonable time to DEQ, any information, including records required by the permit, that is requested in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.f, 4/5/00;  
40 CFR 70.6(a)(6)(v)]

### General Provision 8 – Information Requests, Confidential Business Information

Upon request, the permittee must furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

### General Provision 9 - Severability

If any provision of the permit is held to be invalid, all unaffected provisions of the permit will remain in effect and enforceable.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

### General Provision 10 – Changes Requiring Permit Revision or Notice

The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee must comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/6/05; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380-386, 7/1/02;  
40 CFR 70.4(b)(12), (14), (15), and 70.7(d), (e)]

### General Provision 11 – Changes Requiring Permit Revision or Notice.

Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 7/1/02; IDAPA 58.01.01.209.05, 4/5/00;

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

40 CFR 70.4(b)(14) and (15)]

### General Provisions 12 and 13 – Federal and State Enforceability

All permit conditions are federally enforceable unless specified in the permit as a state or local only requirement. State and local only requirements are not required under the CAA and are not enforceable by EPA or by citizens.

[IDAPA 58.01.01.322.15.j, 5/1/94; IDAPA 58.01.01.322.15.k, 3/23/98;  
Idaho Code §39-108; 40 CFR 70.6(b)(1) and (2)]

### General Provision 14 – Inspection and Entry

Upon presentation of credentials, Clearwater Paper Corporation shall allow DEQ or an authorized representative of DEQ to do the following:

- a. Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.l, 5/1/94; 40 CFR 70.6(c)(2)]

### General Provision 15 – New Requirements During Permit Term

The permittee must continue to comply with all applicable requirements and must comply with new requirements on a timely basis.

[IDAPA 58.01.01.322.10, 4/6/05; IDAPA 58.01.01.314.10.a.ii, 5/1/94;  
40 CFR 70.6(c)(3) citing 70.5(c)(8)]

### General Provision 16 - Fees

The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387, 4/2/03; 40 CFR 70.6(a)(7)]

### General Provision 17 – Certification

All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

### General Provision 18 - Renewal

- a. Clearwater Paper Corporation shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

b. If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

### General Provision 19 – Permit Shield

Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- a. Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
  - i. DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- b. The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- c. Nothing in this permit shall alter or affect the following:
  - i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
  - ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - iii. The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
  - iv. The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00;  
IDAPA 58.01.01.322.15.m, 325.01, 5/1/94; IDAPA 58.01.01.325.02, 3/19/99;  
IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

### General Provision 20 – Compliance Schedule and Progress Reports.

- a. For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- b. For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- c. For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

- d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 5/1/94; IDAPA 58.01.01.314.10, 4/5/00;  
40 CFR 70.6(c)(3) and (4)]

### General Provision 21 – Periodic Compliance Certification

Clearwater Paper Corporation shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as follows:

- a. The compliance certifications for all emissions units shall be submitted annually from December 17 to December 16 or more frequently if specified by the underlying applicable requirement or elsewhere in this permit.
- b. The initial compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
- c. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
  - i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
  - ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required under Subsections 322.06, 322.07, and 322.08;
  - iii. The status of compliance with the terms and conditions of the Tier I operating permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Subsection 322.11.c.ii. above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
  - iv. Such information as the Department may require to determine the compliance status of the emissions unit.
- d. All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 70.6(c)(5)(iii) as amended,  
62 Fed. Reg. 54900, 54946 (10/22/97); 40 CFR 70.6(c)(5)(iv)]

### General Provision 22 – False Statements

Clearwater Paper Corporation may not make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

### General Provision 23 – No Tampering

Clearwater Paper Corporation may not render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

### General Provision 24 – Semiannual Monitoring Reports.

In addition to all applicable reporting requirements identified in this permit, Clearwater Paper Corporation shall submit reports of any required monitoring at least every six months. Clearwater Paper Corporation's semiannual reporting periods shall be from December 17 to June 16 and June 17 to December 16. All instances of deviations from this operating permit's requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 30 days of the end of the specified reporting period.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

### General Provision 25 – Reporting Deviations and Excess Emissions

Each and every applicable requirement, including MRRR, is subject to prompt deviation reporting. Deviations due to excess emissions must be reported in accordance Sections 130-136. All instances of deviation from Tier I operating permit requirements must be included in the deviation reports. The reports must describe the probable cause of the deviation and any corrective action or preventative measures taken. Deviation reports must be submitted at least every six months unless the permit specifies a different time period as required by IDAPA 58.01.01.322.08.c. Examples of deviations include, but are not limited to, the following:

- Any situation in which an emissions unit fails to meet a permit term or condition
- Emission control device does not meet a required operating condition
- Observations or collected data that demonstrate noncompliance with an emissions standard
- Failure to comply with a permit term that requires a report

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

### General Provision 26 – Permit Revision Not Required, Emissions Trading

No permit revision will be required, under any approved, economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

### General Provision 27 - Emergency

In accordance with IDAPA 58.01.01.332, an "emergency" as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

### 6. REGULATORY REVIEW

#### 6.1 Attainment Designation (40 CFR 81.313)

The facility is located in Lewiston, Nez Perce County, Idaho, which is designated as unclassifiable/attainment for all regulated criteria pollutants (i.e., PM<sub>10</sub>, CO, NO<sub>x</sub>, SO<sub>2</sub>, lead, and ozone). There is not a Class I area within 10 kilometers of the facility. This facility is located in Air Quality Control Region (AQCR) 62 and Universal Transverse Mercator (UTM) Zone 11.

#### 6.2 Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

This facility is a major facility as defined by IDAPA 58.01.01.008.10 because it emits or has the potential to emit regulated air pollutants (SO<sub>2</sub>, NO<sub>x</sub>, CO, PM<sub>10</sub>, VOC, and HAPs) in amounts greater than or equal to major facility threshold(s) listed in Subsection 008.10. Refer to Section 4.6 of this document for a complete emissions inventory of the air pollutants emitted by this facility. The Clearwater Paper Corporation Tier I permit is issued in two sections, one section is for the Pulp and Paper Division and the other section is for the Consumer Products Division. A Tier I permit was also issued to Clearwater Lumber Facility. The issuance of these three permits was challenged. The EPA administrator did not find that any aspects of the air rules had been omitted by issuing these permits and the objection to the permit was denied.<sup>2</sup>

#### 6.3 NSPS Applicability (40 CFR 60)

The Consumer Products Division of the Clearwater Paper Corporation Tier I major facility permit does not include emissions units affected by NSPS.

#### 6.4 NESHAP Applicability (40 CFR 61)

The Consumer Products Division of the Clearwater Paper Corporation Tier I major facility permit does not include emissions units affected by 40 CFR 61.

#### 6.5 MACT Applicability (40 CFR 63)

40 CFR 63 Subpart KK (63.820) – Printing and Publishing Industry

The Clearwater facility is a major source of HAPs at which wide-web flexographic printing presses are operated and is, therefore, an affected facility as defined by 40 CFR 63.820(a)(i).

40 CFR 63.821(b) Designation of affected sources

In accordance with 40 CFR 63.821(b), each wide-web flexographic printing affected source that complies with the following criteria is subject only to the requirements of §63.829(e) and §63.830(b)(1) of this subpart.

(1) The owner or operator of the affected source applies no more than 500 kilograms (kg) per month, for every month, of inks, coatings, varnishes, adhesives, primers, solvents, thinners,

<sup>2</sup> Order Responding to Petitioners' Request that the Administrator Object to Issuance of State Operating Permits, May 7, 2007, Stephen L. Johnson, Administrator, EPA  
Page 31 of 35

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

reducers, and other materials on product and packaging rotogravure or wide-web flexographic printing presses, or

(2) The owner or operator of the affected source applies no more than 400 kg per month, for every month, of organic HAP on product and packaging rotogravure or wide-web flexographic printing presses.

Clearwater has indicated that they intend to comply with these requirements. Therefore only the requirements of Subpart KK that are applicable to facilities complying with these options are discussed in this statement of basis and included in the Tier I permit.

Note that In accordance with 40 CFR 63.821(c) - Each affected source that complies with neither the criterion of paragraph (b)(1) nor (b)(2) in any month after the applicable compliance date as specified in §63.826 of this subpart is, starting with that month, no longer eligible to use the provisions of paragraph (b), even if in subsequent months the affected source does comply with the criteria of paragraphs (b)(1) or (b)(2) of this section.

### 40 CFR 63.829(e) Recordkeeping requirements

(e) The owner or operator of each facility which meets the limits and criteria of §63.821(b)(1) shall maintain records as required in paragraph (e)(1) given below. The owner or operator of each facility which meets the limits and criteria of §63.821(b)(2) shall maintain records as required in paragraph (e)(2) given below. Owners or operators shall maintain these records for five years, and upon request, submit them to the Administrator.

(1) For each facility which meets the criteria of §63.821(b)(1), the owner or operator shall maintain records of the total mass of each material applied on product and packaging rotogravure or wide-web flexographic printing presses during each month.

(2) For each facility which meets the criteria of §63.821(b)(2), the owner or operator shall maintain records of the total mass and organic HAP content of each material applied on product and packaging rotogravure or wide-web flexographic printing presses during each month.

### 63.830(b)(1) Reporting requirements

Each owner or operator of an affected source subject to this subpart shall submit an initial notification required in §63.9(b) to the Administrator.

## 6.6 CAM Applicability (40 CFR 64)

The draft permit that was made available for public comment on February 2, 2009 included CAM requirements in Section 6 which were based on Clearwater's June 19, 2007 CAM Plan. Based on Clearwater's comment provided during the public comment period, which includes an uncontrolled emission inventory of less than 100 tons per year for PM/PM-10, DEQ has removed CAM requirements from the Tier I permit. CAM is only applicable to emissions units which have potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 tons per year (40 CFR 64.2(a)(3)). Table 6.1 includes a summary of the uncontrolled particulate matter emission inventory Clearwater for the tissue machines at the plant. The emissions factors include both filterable and condensable particulate matter.

**TIER I OPERATING PERMIT STATEMENT OF BASIS**

<b>Permittee:</b>	Clearwater Paper Corporation. - Consumer Products	<b>Permit No.</b>	T1-2007.0105
<b>Location:</b>	Lewiston, Idaho	<b>Facility ID No.</b>	069-00001

**Table 6.1 Uncontrolled Particulate Matter Emission Inventory for Tissue Machines**

<b>Tissue Machine</b>	<b>Max. Capacity (tons/yr)</b>	<b>PM Emission Factor (lb/ton)</b>	<b>PTE (tons/yr)</b>
1L	5.5*	0.86	20.7
2L	10	0.86	37.7
3L	10	0.86	37.7
Valmet Rewinder	5	0.25	5.5

\*annual average; reflects pending PTC application for hood burner replacement project

The emission factors were developed by the National Council for Air and Stream Improvement (NCASI) and are published in Technical Bulletin No. 942 dated November 2007. Documented in the bulletin are a detailed description of the tissue machine source tested (Source C) and testing methodologies used. From the process description the tested source is analogous to the CPD tissue because the tested machine has similar tissue production capacities as the machines at Clearwater. Furthermore, Clearwater applied the NCASI emission factor in a conservative manner in calculating uncontrolled PM emissions. The CPD tissue machines are controlled by wet scrubbers that collect PM from the dry end of the machines (dryer and reel sections). Clearwater applied the total tissue machine emission factor of 0.86 lb/ton reported in NCASI Bulletin 942 to the maximum production rates of the CPD tissue machines to calculate potential uncontrolled emissions. This total emission factor represents emissions from all tissue machine sources, including the former and press (wet end) vents and dryer exhaust that are not controlled on the CPD tissue machines.

**6.7 Acid Rain Permit (40 CFR 72-75)**

Clearwater's Consumer Products Division does not have an affected unit as defined by 40 CFR 72.6(a) subject to the Acid Rain permit requirements.

**7. PUBLIC COMMENT**

As required by IDAPA 58.01.01.364, a public comment period was made available to the public from February 2, 2009 to March 4, 2009. During this time, comments were submitted in response to DEQ's proposed action. A response to public comments document was crafted by DEQ based on comments submitted during this initial public comment period. A second draft permit was also developed and made available for public review during a new public comment period. The second comment period was held between July 28, 2009 and September 28, 2009. No comments were provided during the second comment period.

**8. EPA REVIEW OF PROPOSED PERMIT**

As required by IDAPA 58.01.01.366, DEQ provided EPA a proposed permit for their review on December 1, 2009. On December 11, 2009 EPA notified DEQ that the permit was eligible for issuance.

## **Appendix A – AIRS Information**

**Permit No. T1-2007.0105**



### AIRS/AFS Facility-wide Classification Form

**Facility Name:** Clearwater Paper Corporation - Consumer Products Division  
**Facility Location:** Lewiston  
**Facility ID:** 069-00001 **Date:** January 12, 2009  
**Project/Permit No.:** T1-2007.0105 **Completed By:** Dan Pitman

Check if there are no changes to the facilitywide classification resulting from this action. (compare to form with last permit)

Yes, this facility is an SMO source.

Identify the facility's area classification as A (attainment), N (nonattainment), or U (unclassified) for the following pollutants:

Area Classification: 

SO <sub>2</sub>	PM <sub>10</sub>	VOC
A	U	U

 DO NOT LEAVE ANY BLANK

Check one of the following:

**SIP [0]** - Yes, this facility is subject to SIP requirements. (do not use if facility is Title V)

OR

**Title V [V]** - Yes, this facility is subject to Title V requirements. (if yes, do not also use SIP listed above.)

For SIP or TV, identify the classification (A, SM, B, C, or ND) for the pollutants listed below. Leave box blank if pollutant is not applicable to facility.

Classification: 

SO <sub>2</sub>	NO <sub>x</sub>	CO	PM <sub>10</sub>	PT (PM)	VOC	THAP
A	A	A	A	A	A	A

**PSD [6]** - Yes, this facility has a PSD permit.

If yes, identify the pollutant(s) listed below that apply to PSD. Leave box blank if pollutant does not apply to PSD.

Classification: 

SO <sub>2</sub>	NO <sub>x</sub>	CO	PM <sub>10</sub>	PT (PM)	VOC	THAP
<input checked="" type="checkbox"/>	<input type="checkbox"/>					

**NSR - NAA [7]** - Yes, this facility is subject to NSR nonattainment area (DAPA 56.01.01.204) requirements.

Note: As of 9/12/08, Idaho has no facility in this category.

If yes, identify the pollutant(s) listed below that apply to NSR-NAA. Leave box blank if pollutant does not apply to NSR - NAA.

Classification: 

SO <sub>2</sub>	NO <sub>x</sub>	CO	PM <sub>10</sub>	PT (PM)	VOC	THAP
<input type="checkbox"/>						

**NESHAP [8]** - Yes, this facility is subject to NESHAP (Part 61) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?

**NSPS [9]** - Yes, this facility is subject to NSPS (Part 63) requirements.

If yes, what CFR Subpart(s) is applicable?

If yes, identify the pollutant(s) regulated by the subpart(s) listed above. Leave box blank if pollutant does not apply to the NSPS.

Classification: 

SO <sub>2</sub>	NO <sub>x</sub>	CO	PM <sub>10</sub>	PT (PM)	VOC	THAP
<input type="checkbox"/>						

**MACT [M]** - Yes, this facility is subject to MACT (Part 63) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?

REV. 9/23/2008