STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

January 1, 2010

Sue Somers
Environmental Engineering Manager
Clearwater Paper Corporation
P.O. Box 1126
Lewiston, Idaho 83501

RE: Facility ID No. 069-00001, Clearwater Paper Corporation, Lewiston
Final Tier I Operating Permit Letter

Dear Ms. Somers:

The Department of Environmental Quality (DEQ) is issuing Tier I Operating Permit No. TI-2007.0106 to Clearwater Paper Corporation in accordance with IDAPA 58.01.01.300 through 386, Rules for the Control of Air Pollution in Idaho (Rules).

The enclosed permit is effective immediately, summarizes the applicable requirements for your facility, and requires an annual compliance certification for all emissions units. This permit replaces Tier I Operating Permit No. 2007.0057, December 17, 2002. The enclosed operating permit is based on the information contained in your permit application received on June 19, 2007. Modifications to and/or renewal of this operating permit shall be requested in a timely manner in accordance with the Rules.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Amber Rand, Air Quality Analyst, at 208-799-4370 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Dan Pitman at 208 373-0500 or daniel.pitman@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS/DP Permit No. TI-2007.0106

Enclosure

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Mike Simon
Stationary Source Program Manager
Air Quality Division

MS/DP Permit No. TI-2007.0106

Enclosure

Air Quality **TIER I OPERATING PERMIT** **State of Idaho** **Department of Environmental Quality**	**PERMIT NO.:** T1-2007.0106 **FACILITIY ID NO.:** 069-00001 **AQCR:** 62 **CLASS:** A **ZONE:** 11 **SIC:** 2611 **NAICS:** 322110 **UTM COORDINATE (km):** 501.9, 5141.3

1. **PERMITTEE**
Clearwater Paper Corporation, Idaho Pulp and Paperboard Division, Lewiston

2. **PROJECT**
Tier I Operating Permit - Permit Renewal

3. **MAILING ADDRESS** P.O. Box 1126	**CITY** Lewiston	**STATE** ID	**ZIP** 83501-1126
4. **FACILITY CONTACT** Susan Somers	**TITLE** Environmental Engineering Manager	**TELEPHONE** (208) 799-4104	
5. **RESPONSIBLE OFFICIAL** Plant Manager	**TITLE** Plant Manager	**TELEPHONE** (208) 799-1561	
6. **EXACT PLANT LOCATION** 803 Mill Road, Lewiston, Idaho		**COUNTY** Nez Perce	

7. **GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**
Pulp and paperboard manufacturing

8. **PERMIT AUTHORITY**

This Tier I operating permit is issued pursuant to Idaho Code §39-115 and the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.300 - 386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality (DEQ) for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210, and the permittee elects not to incorporate those terms and conditions into this operating permit.

The effective date of this permit is the date of signature by DEQ on the cover page.

Dan Pitman

DAN PITMAN, P.E., PERMIT WRITER
DEPARTMENT OF ENVIRONMENTAL QUALITY

Mike Simon

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED:	January 1, 2010
DATE MODIFIED/AMENDED	
DATE EXPIRES:	January 1, 2015

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

acfm	actual cubic feet per minute
ADTUBP/hr	air dried ton unbleached pulp per hour
ADP	air dried pulp
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
CAM	compliance assurance monitoring
CERMS	continuous emissions rate monitoring system
CEMS	continuous emissions monitoring system
Clearwater	Clearwater Paper Corp., Idaho Pulp and Paperboard Division, Lewiston Facility
CMS	continuous monitoring system
CFR	Code of Federal Regulations
Cl_2	chlorine
ClO_2	chlorine dioxide
CO	carbon monoxide
CaO	lime
COMS	Continuous Opacity Monitoring System
DEQ	Department of Environmental Quality
dscf	Dry Standard Cubic Feet
EPA	U.S Environmental Protection Agency
ESP	electrostatic precipitator
g/kg	gram per kilogram
ft	foot or feet
gal/mo	gallons per month
gpm	gallons per minute
gr	grain (1 lb = 7,000 grains)
gr/dscf	grains per dry standard cubic foot
HAP	hazardous air pollutant
HCl	hydrogen chloride
HVLC	high volume, low concentration
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/day	pounds per day
lb/hr	pound per hour
lb/MMBtu	pounds per million British thermal units
lb sulfur/T ADP	pounds of sulfur per ton of air dried pulp
lb/T, lb/ton	pounds per ton
lb/T ADP	pounds per ton of air dried pulp
LVHC	low volume, high concentration
MACT	Maximum Achievable Control Technology
MMBtu/hr	million British thermal units per hour
MMlb/mo	million pounds per month
NAAQS	national ambient air quality standard

NESHAP	National Emission Standards for Hazardous Air Pollutants
NGCS	noncombustible gasses
NO_X	nitrogen oxides
NSPS	New Source Performance Standards
ODP	oven-dried pulp
O&M	Operations and Maintenance
OP	operating permit
PM	particulate matter
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers or less
ppm	parts per million
psig	pounds per square inch gauge
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTO	permit to operate
PW	process weight
QA/QC	Quality Assurance/Quality Control
QIP	Quality Improvement Plan
RA	Relative Accuracy
RAA	Relative Accuracy Audit
RATA	Relative Accuracy Test Audit
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO_2	sulfur dioxide
tADP/tCaO	tons of air dried pulp per ton of lime
T/hr	tons per hour
T/mo	tons per month
T/R	Transformer-Rectification
TRS	total reduced sulfur
T/yr	tons per year
U.S.C.	United States Code
UTM	Universal Transverse Mercator
VOC	volatile organic compound

TIER I OPERATING PERMIT SCOPE

PURPOSE

- This Tier I operating permit (OP) establishes facility-wide requirements in accordance with the Idaho State Implementation Plan and the Rules.
- This Tier I OP renewal replaces Tier I OP No. T1-2007.0057, issued December 17, 2002, the terms and conditions of which shall no longer apply.
- Potlatch Forest Products Corporation has changed their name to Clearwater Paper Corporation
- 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 document is the Pulp and Paper Division section of the Tier I permit.

1. FACILITY-WIDE CONDITIONS

The following table contains a summary of requirements that apply generally to emissions units at the facility.

Table 1.1 FACILITY-WIDE APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
1.1	Fugitive dust	Reasonable control	IDAPA 58.01.01.651	1.2, 1.3, 1.4, 1.9, 1.11
1.5	Odors	Reasonable control	IDAPA 58.01.01.776	1.6, 1.11
1.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 1.11
1.9	Excess emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130-136	1.9-1.9.5, 1.11
1.10	Performance testing	Compliance testing	IDAPA 58.01.01.157	1.11
1.12	Reports and certifications	Compliance with IDAPA 58.01.01.322	IDAPA 58.01.01.322	1.11
1.13	Fuel-burning equipment	Natural gas - PM 0.015 gr/dscf at 3% oxygen Liquid - PM 0.05 gr/dscf at 3% oxygen	IDAPA 58.01.01.676, 677	1.11
1.14	Sulfur content	ASTM Grade 1 fuel oil – 0.3% by weight; ASTM Grade 2 fuel oil – 0.5% by weight; Residual oil – 1.75% by weight	IDAPA 58.01.01.727, 728	1.14.1, 1.11
1.15	Open burning	compliance with IDAPA 58.01.01.600-616	IDAPA 58.01.01.600-616	1.11
1.16	Renovation/ Demolition	40 CFR 61, Subpart M	40 CFR 61, Subpart M	1.11
1.17	Regulated Substances for Accidental Release Prevention	40 CFR 68	40 CFR 68	1.11
1.18	Recycling and Emissions Reductions	40 CFR 82	40 CFR 82	1.11
1.19	NSPS General provisions	40 CFR 60 Subpart A	40 CFR 60 Subpart A	1.11

Fugitive Dust

1.1 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]

1.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (e.g., water, chemical dust suppressants) to reasonably control fugitive dust emissions.

[IDAPA 58.01.01.322.06, 07]

1.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07

1.4 The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive dust emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive dust emissions are effective. If fugitive dust emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive dust emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive dust emissions, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07]

Odors

1.5 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)]

1.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07 (state-only)]

Visible Emissions

1.7 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]

1.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a 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:

a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

or

b) perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

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

Excess Emissions

Excess Emissions - General

1.9 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 1.9 and the regulations of IDAPA 58.01.01.130-136.

1.9.1 The person responsible for or in charge of a facility during an excess emissions event shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing the excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and shall, as provided below or upon request of DEQ, submit a full report of such occurrence, including a statement of all known causes, and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132]

Excess Emissions – Startup, Shutdown, Scheduled Maintenance

1.9.2 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:

[IDAPA 58.01.01.133]

- A prohibition of any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory or a Wood Stove Curtailment Advisory has been declared by DEQ.

  [IDAPA 58.01.01.133.01.a]

- Notifying DEQ of the excess emissions event as soon as reasonably possible, but no later than two hours prior to, the start of the event, unless the owner or operator demonstrates to DEQ's satisfaction that a shorter advance notice was necessary.

  [IDAPA 58.01.01.133.01.b]

- The owner or operator of a source of excess emissions shall report and record the information required pursuant to Permit Conditions 1.9.4 and 1.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

  [IDAPA 58.01.01.133.01.c]

Excess Emissions – Upset, Breakdown, or Safety Measures

1.9.3 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

[IDAPA 58.01.01.134]

1.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall comply with the following:

[IDAPA 58.01.01.134.02]

- The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.

  [IDAPA 58.01.01.134.02.a]

- The owner or operator shall notify DEQ of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or

emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the owner or operator demonstrates to DEQ's satisfaction that the longer reporting period was necessary.

[IDAPA 58.01.01.134.02.b]

- The owner or operator shall report and record the information required pursuant to Permit Conditions 1.9.4 and 1.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

[IDAPA 58.01.01.134.02.c]

1.9.3.2 During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by DEQ shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the facility owner or operator.

[IDAPA 58.01.01.134.03]

Excess Emissions – Reporting and Recordkeeping

1.9.4 A written report for each excess emissions event shall be submitted to DEQ by the owner or operator no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02. Excess reports shall contain the following:

a. The time period during which the excess emissions occurred;
b. Identification of the specified equipment or emissions unit which caused the excess emissions;
c. An explanation of the cause, or causes, of the excess emissions and whether the excess emissions occurred as a result of startup, shutdown, scheduled maintenance, upset, breakdown or a safety measure;
d. An estimate of the emissions in excess of any applicable emission standard (based on knowledge of the process and facility where emissions data is unavailable);
e. A description of the activities carried out to eliminate the excess emissions; and
f. Certify compliance status with the requirements of Sections 131, 132, 133.01, 134.01 through 134.03, 135, and 136.
g. If requesting consideration under Subsection 131.02, certify compliance status with Section 131, 132, 133.01 through 133.03, 134.01 through 134.05, 135, and 136.

[IDAPA 58.01.01.135.01 and 02]

1.9.5 The owner or operator shall maintain excess emissions records at the facility for the most recent five-calendar-year period. The excess emissions records shall be made available to DEQ upon request and shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

[IDAPA 58.01.01.136.01, 02; IDAPA 58.01.01.136.03; IDAPA 58.01.322.07]

- An excess emissions log book, or electronic file, for each emissions unit or piece of equipment containing copies of all reports that have been submitted to DEQ pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment; and

[IDAPA 58.01.01.136.03.a]

- Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, or safety preventative maintenance plans that have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136.03.b]

Performance Testing

1.10 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
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

Unless a longer time 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

Except for the optional approval of a longer time period for test report submittal provided above, should there be a conflict between this permit condition and IDAPA 58.01.01.157, IDAPA 58.01.01.157 shall govern.

[IDAPA 58.01.01.157]

Monitoring and Recordkeeping

1.11 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]

Reports and Certifications

1.12 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]

Fuel-Burning Equipment

1.13 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, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[IDAPA 58.01.01.676-677]

Sulfur Content

1.14 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]

1.14.1 The permittee shall not use or make available for use, any residual fuel oil containing more than one and three-fourths percent (1.75%) sulfur by weight.

[IDAPA 58.01.01.727]

1.14.2 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]

Open Burning

1.15 The permittee shall comply with the *Rules for Control of Open Burning,* IDAPA 58.01.01.600-623.

[IDAPA 58.01.01.600-623]

Renovation/Demolition

1.16 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M – Asbestos.

[40 CFR 61 M]

Regulated Substances for Accidental Release Prevention

1.17 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.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10 (a)]

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)]

Recycling and Emissions Reductions

1.18 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]

NSPS 40 CFR 60 Subpart A –General Provisions

1.19 Generally applicable reporting, record keeping and notification requirements of Subpart A of the New Source Performance Standards (NSPS, 40 CFR 60) are included in Table 1.3. These summaries are provided to highlight the notification and record keeping requirements of 40 CFR 60 for affected facilities, and are not intended to be a comprehensive listing of all general provisions requirements that may apply. Should there be a conflict between these summaries and the NSPS, the NSPS shall govern. The permittee is encouraged to read all of 40 CFR 60 Subpart A.

Table 1.3 NSPS Subpart A (40 CFR 60) Summary of General Provisions for Affected Facilities

Section	Section Title	Summary of Section Requirements
60.4	Address	Lewiston Regional Office Department of Environmental Quality 1118 "F" Street Lewiston, ID 83501
60.7(b),(c)(d) and (f)	Notification and Record Keeping	• Notification of commencement of construction postmarked no later than 30 days of such date. • Notification of startup postmarked within 15 days of such date. • Notification of physical or operational change that may increase emissions postmarked 60 days before the change is made. • Maintain records of the occurrence and duration of any: startup, shutdown or malfunction of the affected source; malfunction of air pollution control device; and any period when a continuous monitoring system or monitoring device is inoperative. • For affected units with continuous monitoring device requirements report excess emissions and monitoring system performance semiannually, postmarked by January 30th and July 30th (in the format required by NSPS). • Maintain in a permanent form records suitable for inspection of all measurements, system testing, performance measurements, calibration checks, and adjustments/maintenance performed. Records shall be maintained for a period of two years from the date the record is required to be generated by the applicable regulation. • CEMS record keeping requirements depending on whether data is automatically or manually recorded - 40 CFR 60.7(f).
60.8	Performance Tests	• The owner or operator shall provide notice at least 30 days prior to any performance test to afford an opportunity for an observer to be present during testing. • Within 60 days of achieving maximum production, but not later 180 days after startup the permittee shall conduct performance test(s) and furnish a written report of the results of the test(s)
60.11(a),(b),(c), (d) and (g)	Compliance with Standards and Maintenance Requirements	• Other than opacity standards, where performance tests are required compliance with standards is determined by methods and procedures established by 40 CFR 60.8. • Compliance with NSPS opacity standards shall be determined by Method 9 of Appendix A. The owner or operator may elect to use COM measurements in lieu of Method 9 provided notification is made at least 30 days before the performance test. • At all times, including periods of startup, shutdown, and malfunction to the extent practicable, the operator shall maintain and operate any

		affected facility and air pollution control equipment consistent with good air pollution control practices. • For the purposes of determining compliance with standards any creditable evidence may be used if the appropriate performance or compliance test procedure has been performed.
60.12	Circumvention	No owner or operator shall build, erect, install or use any article or method, including dilution, to conceal an emission which would otherwise constitute a violation.
60.13	Monitoring Requirements	All COMs and CEMs shall conform to the reporting, calibration and data reduction requirements specified in detail by this section. Reporting requirements include submitting performance evaluations reports within 60 days of the evaluations required by this section, and submitting results of the performance evaluations for the COMs within 10 days before a performance test if using COMs to determine compliance with opacity during a performance test instead of Method 9.
60.14	Modification	• Physical or operational changes to source types that are regulated by a NSPS which result in an increase in hourly emissions to which a standard applies is considered a modification (unless expressly exempted the NSPS). Modified sources become subject to the NSPS standards • Note that in accordance with IDAPA 58.01.01.201 no owner or operator may commence a modification without first obtaining a permit to construct unless the modification is exempted from the need to obtain a permit in accordance with IDAPA 58.01.01.220-223.

2. PACKAGE BOILERS AND POWER BOILERS NO. 1, 2, AND 3

Table 2.1 below describes the devices used to control emissions from the power boilers.

TABLE 2.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emissions Units(s)/Process(es)	Emission Control Device
240	Power boiler No. 1, oil- or natural gas-fired	None
253	Power boiler No. 2, oil- or natural gas-fired or Replacement Package Boiler, natural gas-fired	None
254	Power boiler No. 3, natural gas-fired or Replacement Package Boiler, natural gas-fired	None

Table 2.2 contains a summary of requirements that apply to boilers No.1, 2, and 3, and to the Package Boilers used to replace boilers No. 2 and 3. Specific permit requirements are listed below Table 2.2.

Table 2.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
2.1	PM	0.015 gr/dscf at 3% oxygen (gas); 0.050 gr/dscf at 3% oxygen (oil)	IDAPA 58.01.01.676, 677	2.7
1.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8
2.2	NSPS Requirements	NSPS emission standards	40 CFR 60 subparts A and D, Db or Dc	1.19 & 2.10
2.3	Thermo-compressor Steam Rate	55.8 MMlb/month	PTC No. 069-00001, 8/31/01	2.8
2.4	Existing Boiler Use	Permanently discontinue operation after being replaced	40 CFR 52.21(a)(2)(iv) and 52.21(b)(33)	2.12
2.5	PSD Requirements	Significant emissions increase and notification requirements for each boiler replacement occurrence	40 CFR 52.21(a)(2)(iv) and 52.21(b)(33)	2.10, 2.11 & 2.12
2.6	Replacement Boiler Size Limits	One Package Boiler shall not exceed a rated heat input capacity of 250 MMBtu/hr and the other shall not exceed 336 MMBtu/hr	40 CFR 52.21(a)(2)(iv) and 52.21(b)(33)	2.12
2.7	Allowable Fuels	Natural gas exclusively in Package Boilers	PTC No. P-2008.0009, 4//24/08	2.12

Emission Limits

2.1 The permittee shall not discharge PM to the atmosphere from Power Boilers No. 1, 2, or 3, or from any Package Boiler, in excess of the concentrations shown in Table 2.3.

TABLE 2.3 POWER BOILER ALLOWABLE PARTICULATE MATTER EMISSIONS

Fuel Type	Allowable Particulate Emissions	Percent Oxygen
Gas	0.015 gr/dscf	3%
Oil	0.050 gr/dscf	3%

The effluent gas shall be corrected to the oxygen concentration shown.

[IDAPA 58.01.01.677]

2.2 For each Package Boiler, the permittee shall comply with the emission standards and other requirements under 40 CFR Part 60 Subpart A and Subpart D, Db or Dc if the boiler is an affected facility under the Subpart. The permittee shall submit all required notifications to the address given below.

Lewiston Regional Office
Department of Environmental Quality
1118 F Street
Lewiston, ID 83501

[PTC No. P-2008.0009, 4/24/08; 40 CFR 60 .1, 60.40,, 60.40b, 60.40c]

Operating Requirements

2.3 The steaming rate for the 170-psig steam header to the two thermo compressors shall not exceed 55.8 million pounds per month (55.8 MMlb/mo).

[PTC No. 069-00001, 8/31/01]

2.4 The permittee shall permanently discontinue operation of Power Boiler No. 2 and Power Boiler No. 3 on or before the date any Package Boiler begins operation at the facility. If Power Boiler No. 2 and Power Boiler No. 3 are proposed to be brought back into operation, they shall be considered new emissions units and shall be subject to permitting in accordance with IDAPA 58.01.01.200.

[PTC No. P-2008.0009, 4/24/08; IDAPA 58.01.01.205, 5/1/94; 40 CFR 52.21(a)(2)(iv) and 52.21(b)(33)]

2.5 The permittee may replace the power boilers multiple times provided each replacement is in compliance with the requirements of this permit and:

- The replacement boiler project(s) do not exceed a significant emission increase as determined by the methods specified by 40 CFR 52.21(a)(2)(iv)(c);
- The replacement boiler is identical to or functionally equivalent to the replaced boiler in accordance with 40 CFR 52.21(b)(33)(ii);

- The replacement boiler does not have maximum hourly heat input and maximum hourly fuel consumption design rate greater than the replaced boiler in accordance with 40 CFR 52.21(b)(33)(iii); and
- The permittee complies with any applicable notification requirements of Permit Condition 2.12.

[PTC No. P-2008.0009, 4/24/08; IDAPA 58.01.01.205, 5/1/94; 40 CFR 52.21(a)(2)(iv) and 52.21(b)(33)(iii)]

2.6 The rated heat input capacity of one of the Package Boilers shall be less than or equal to 250 MMBtu/hr. The rated heat input capacity of the other Package Boiler shall be less than or equal to 336 MMBtu/hr.

[PTC No. P-2008.0009, 4/24/08; IDAPA 58.01.01.205, 5/1/94; 40 CFR 52.21(a)(2)(iv) and 52.21(b)(33)]

2.7 Each Package Boiler shall be fired with natural gas exclusively.

[PTC No. P-2008.0009, 4/24/08]

Monitoring and Recordkeeping

2.8 The permittee shall continuously monitor and record the steaming rate from the 170-psig steam header to the two thermocompressors in pounds per hour. The monitoring unit shall provide 95% data capture on a monthly basis or alternate data capture as provided by DEQ. A compilation of the most recent five years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

[PTC No. 069-00001, 8/31/01]

2.9 The permittee shall record the steaming rate from the 170-psig steam header to the two thermocompressors based on a monthly average of all steaming rate measurements taken during each monthly period. A compilation of the most recent five years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

[PTC No. 069-00001, 8/31/01]

2.10 For each Package Boiler, within 60 days of achieving the maximum production rate of the boiler, but not later than 180 days after initial startup of the boiler, the permittee shall conduct a performance test to measure NO_x and CO emissions from the boiler stack. The tests shall be conducted in accordance with the procedures outlined in 40 CFR 60, Appendix A, Methods 7 and 10, or a DEQ-approved alternative. If the boiler is subject to 40 CFR Part 60 Subpart D, Db or Dc, the NO_x test may be conducted in accordance with the applicable method under the subpart. For tests conducted on-site, the initial performance test, and any subsequent performance tests conducted to demonstrate compliance, shall be performed in accordance with IDAPA 58.01.01.157. Test report information from a test(s) conducted on the boiler within five years prior to installation at the facility (e.g., an off-site test to meet requirements under 40 CFR Part 60) may be submitted to satisfy this permit condition; and for such tests, in order to satisfy IDAPA 58.01.01.157 only the requirements of IDAPA 58.01.01.157.02 must be met. In addition, the following information shall be recorded during each performance test run and included in the performance test report (for a test conducted prior to installing the boiler, information items below may be waived with DEQ approval):

- Manufacturer's name, model number, serial number and rated heat input capacity of the boiler;
- The boiler shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report;

- The fuel consumption shall be recorded in units of MMBtu/hr and MMscf/hr;
- Visible emissions shall be observed and recorded using the methods specified in IDAPA 58.01.01.625; and
- The measured NO_x and CO emission rate shall be reported in units of pounds per hour, pounds per MMBtu of heat input to the boiler and in units of pounds per MMscf of natural gas input to the boiler. All calculations used to convert the test results into these units shall be provided in the test report.

[PTC No. P-2008.0009, 4/24/08]

2.11 For the initial Package Boiler installation project to replace Power Boilers No. 2 and No. 3, and for each subsequent Package Boiler replacement project, the permittee shall maintain records and provide reports in accordance with IDAPA 58.01.01.205.01 [40 CFR 52.21(r)(6) and (7)]:

2.11.1 In accordance with 40 CFR 52.21(r)(6)(i), before beginning actual construction of the project, the owner or operator shall document and maintain a record of the following information:

(a) A description of the project;

(b) Identification of the emissions unit(s) whose emissions of a regulated NSR pollutant could be affected by the project; and

(c) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions and the projected actual emissions.

2.11.2 In accordance with 40 CFR 52.21(r)(6)(iii), the owner or operator shall monitor the emissions of CO, NO_x, PM, PM_{10}, and VOC from the two Package Boilers; and calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five years following resumption of regular operations after the change.

These records shall include but not be limited to calculations of emissions based on performance tests conducted in accordance with Permit Condition 2.10.

2.11.3 In accordance with 40 CFR 52.21(r)(6)(v), the owner or operator shall submit a report to DEQ and the EPA Administrator if the annual emissions, in tons per year, from the project identified under Permit Condition 2.11.1, exceed the baseline actual emissions (as documented and maintained pursuant to Permit Condition 2.11.1(c)), by a significant amount (as defined in 40 CFR 52.21(b)(23)) for that regulated NSR pollutant, and if such emissions differ from the preconstruction projection as documented and maintained pursuant to Permit Condition 2.11.1(c). Such report shall be submitted to DEQ and the EPA Administrator within 60 days after the end of such year.

For the initial Package Boiler installation project to replace Power Boilers No. 2 and No. 3, the information in Table 2.4 shall be used for purposes of complying with this requirement:

Table 2.4, 40 CFR 52.21(r)(6)(v) INFORMATION FOR THE INITIAL PACKAGE BOILER PROJECT

TYPE OF EMISSIONS	NO_x (T/yr)	CO (T/yr)
Baseline Actual Emissions (BAE)	446	93.6
Significant defined by 52.21(b)(23)	40	100
Annual emission rate that would exceed BAE by a significant amount	486	194
Preconstruction projection	132	96.7

2.11.4 In accordance with 40 CFR 52.21(r)(6)(v), the report shall contain the following:

(a) The name, address and telephone number of the major stationary source;

(b) The annual emissions as calculated pursuant to Permit Condition 2.11.2; and

(c) Any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).

2.11.5 In accordance with 40 CFR 52.21(r)(7) the information be documented and maintained pursuant to Permit Conditions 2.11.1 through 2.11.4 shall be made available for review upon request for inspection by DEQ, the EPA Administrator or the general public pursuant to the requirements contained in 40 CFR 70.4(b)(3)(viii). The most recent five years' compilation of data shall be kept on site for this purpose.

[PTC No. P-2008.0009, 4/24/08; IDAPA 58.01.01.205, 4/6/05; 40 CFR 52.21(r)(6) and (7)]

Reporting Requirements

2.12 Within 60 days after commencing operation of each replacement boiler (Package Boiler), including the initial installation and each subsequent installation, the permittee shall submit the following information to DEQ in accordance with IDAPA 58.01.01.211.01:

- manufacturer and model number
- date of manufacture
- maximum heat input capacity in MMBtu/hr
- a determination showing whether or not requirements under 40 CFR Part 60 apply to the boiler

If records are required to be prepared in accordance with Permit Condition 2.11, submit a copy of the records for each boiler replacement project to:

Lewiston Regional Office
Department of Environmental Quality
1118 F Street
Lewiston, ID 83501

[PTC No. P-2008.0009, 4/24/08]

3. NO. 4 POWER BOILER

Table 3.1 below describes the devices used to control emissions from the power boiler.

TABLE 3.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emissions Units(s)/Process(es)	Emission Control Device
781	Combustion Engineering boiler burning wood waste, and natural gas installed in 1980	Multiclones, Electrostatic Precipitator

Table 3.2 contains a summary of the requirements that apply to power boiler No. 4. Specific permit requirements are listed below Table 3.2. The No. 4 Power Boiler is also regulated by CAM in Section 19 of the permit, and must comply with the General Provisions of NSPS which are included in Permit Condition 1.19.

TABLE 3.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
3.1	PM	0.10 lb/MMBtu	40 CFR 60.42(a)(1)	3.8 & Permit Section 19
3.2	PM	0.015 gr/dscf at 12% CO_2, & 120 T/yr	PTC, 9/20/78	3.8, 3.9, & Permit Section 19
3.3	Opacity	20%, except for 6 min/hr not to exceed 27%	40 CFR 60.42(a)(2)	3.11 & Permit Section 19
3.4	SO_2	0.80 lb/MMBtu	40 CFR 60.43(a)(1)	3.12, 3.15
3.5	NO_x	Gas/wood: 0.2 lb/MMBtu; Oil/wood: 0.3 lb/MMBtu; 842 T/yr	PSD permit	3.10, 3.17
3.6	NO_x	Gas: 0.20 lb/MMBtu; Gas/wood, Oil/wood: 0.30 lb/MMBtu;	40 CFR 60.44(a)(1)& (2)	3.10, 3.17
3.7	SO_2	100 tons per any consecutive 12-months	PTC, 9/20/78	3.12, 3.15

Emission Limits

3.1 No person shall discharge to the atmosphere any gases which contain PM in excess of 0.10 lb/MMBtu derived from fossil fuel or fossil fuel and wood residue.

[40 CFR 60.42(a)(1]

3.2 Emissions of particulate matter shall not exceed 0.015 gr/dscf at 12% CO_2, and 120 tons per year.

[PTC, 9/20/78]

3.3 No person shall discharge to the atmosphere any gases which exhibit greater than 20% opacity, except for one six-minute period per hour of not more than 27% opacity.

[40 CFR 60.42(a)(2]

The No. 4 Power Boiler opacity shall be maintained at 20 percent opacity, except that up to 40 percent opacity is permissible for 2 minutes in any hour.

[PTC, 9/20/78]

3.4 No person shall discharge to the atmosphere any gases which contain SO_2 in excess of 0.80 lb/MMBtu derived from liquid fossil fuel or liquid fossil fuel and wood residue in accordance with 40 CFR 60.43(a).

[40 CFR 60.43(a)(1) and (b]

3.5 The permittee shall not discharge to the atmosphere any gases from power boiler No. 4 which contains NO_x in excess of 0.2 lb/MMBtu, 3-hour rolling average, derived from wood waste/gas, and 0.3 lb/MMBtu, 3-hour rolling average, derived from wood waste/oil. When different fossil fuels are burned simultaneously in any combination, the applicable standard is determined by the formula in 40 CFR 60.44(b). The NO_x emissions shall not exceed 842 T/yr.

[EPA PSD approval, PSD-X80-18, 9/30/80]

3.6 No owner or operator shall cause to be discharged into the atmosphere any gases which contain NO_x in excess of 0.20 lb/MMBtu, 3-hour rolling average, derived from gaseous fossil fuel alone and 0.30 lb/MMBtu, 3-hour rolling average, from liquid fossil fuel, liquid fossil fuel and wood residue, or gaseous fossil fuel and wood residue. When different fossil fuels are burned simultaneously in any combination, the applicable standard is determined by the formula in 40 CFR 60.44(b).

[40 CFR 60.44(a)(1) and 40 CFR 60.44(a)(2)]

3.7 Sulfur Dioxide emissions shall not exceed 100 tons per any consecutive 12-month period.

[PTC, 9/20/78]

Monitoring and Recordkeeping

3.8 Particulate matter emissions shall be measured once each five years using procedures and methods in accordance with IDAPA 58.01.01.157.

[IDAPA 58.01.01.322.09]

During the test opacity shall be continually monitored and recorded so that data is available to assess compliance with Permit Condition 19.9. These CAM indicators monitored during the test shall be reported with the test results.

[IDAPA 58.01.01.322.06]

3.9 Each month the permittee shall calculate the particulate matter emission rate for the previous 12-months. Particulate matter emissions rates shall be calculated using the results of the most recent particulate matter source test, the fuel usage rate during the test, and the fuel usage rate during most recent 12-month period.

[IDAPA 58.01.01.322.06]

3.10 A continuous monitoring system shall be installed and operated to measure and record NOx in accordance with 40 CFR Part 60, Appendix B, Performance Specification 2. The Company may avoid continuous monitoring if it can demonstrate that during source compliance tests NOx emissions are at least 30% below the emission standard.

[EPA PSD Approval, PSD-X80-18]

3.11 Each owner or operator shall install, calibrate, maintain, and operate continuous opacity monitoring system (COMS) for measuring opacity and a CEMS for measuring NO_x emissions, and either oxygen (O_2) or carbon dioxide (CO_2) in accordance with 40 CFR 60.45(a) and (b).

Should there be a conflict between Permit Condition 3.11 and 40 CFR 60.45(a) and (b), 40 CFR 60.45(a) and (b) shall govern.

[40 CFR 60.45(a)&(b)]

3.12 Within 180 days of permit issuance the permittee shall operate a SO_2 and diluent CEM meeting the specifications and test procedures of 40 CFR 60 Appendix B, PS2 and PS3. The permittee shall:

- Calculate SO_2 emissions in lb/MMBtu using the procedures in 40 CFR 60.45(e) and (f) once each month.
- Calculate SO_2 emissions in tons/month and tons/consecutive 12-months using SO_2 lb/MMBtu and boiler heat input.
- Conduct a relative accuracy test audit (RATA) once each five years using the procedures in PS2 and PS3.

[IDAPA 58.01.01.322.06]

3.13 The conversion procedures specified in 40 CFR 60.45(e) shall be used to convert the NO_x monitoring data into units of the applicable standards of 40 CFR 60.44(a).

[40 CFR 60.45(e)]

3.14 To determine compliance with the ton-per-year NO_x emission limit in Permit Condition 3.5, each month the permittee shall calculate the monthly emissions and annual emissions for the previous 12-month period.

[IDAPA 58.01.01.322.06]

3.15 Each month the permittee shall maintain records of:

- each type of fuel combusted, and
- the total Btu's of each fuel type that is combusted.

[IDAPA 58.01.01.322.06, 07]

3.16 The permittee shall comply with the applicable requirements of 40 CFR 60.7(b) and (e) for the NOx and COMS required by 40 CFR 60.45.

[40 CFR 60.7(b) and (e]

Reporting Requirements

3.17 The permittee shall notify the Department of any occurrence of any emissions excess of limits specified in Permit Condition 3.5; such notification shall be forwarded to the Department in a timely fashion and in each instance no later than 10 days from the date of such occurrence. The notification shall include an estimate of the resultant emissions and a narrative report of the cause, duration and steps taken to correct the problem and avoid recurrence. The Clearwater Paper Corporation shall contemporaneously send a copy of all such reports to EPA.

[EPA PSD Approval, PSD X-80-18, 9/30/80]

4. TEMPORARY BOILERS (2)

Table 4.1 below describes the devices used to control emissions from the temporary boiler.

TABLE 4.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICE

Emission Point ID	Emissions Units(s)/Process(es)	Emission Control Device
82, 83	Natural gas-fired boilers (2)	None

Table 4.2 contains a summary of requirements that apply to the temporary boilers when they are present at the facility.

TABLE 4.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
1.13	PM	0.015 gr/dscf at 3% oxygen	IDAPA 58.01.01.676	NA
1.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 1.11
4.1	Fuel Type	Exclusively natural Gas	PTC No. 069-00001, 11/6/98	4.4
4.2	Number and Size of Boiler	No more than 2 temporary boilers shall be used, and each shall be less than 100MMBtu/hr	PTC No. 069-00001, 11/6/98	4.5
4.3	Concurrent operation of boiler	Unlimited hours if an existing boiler is shutdown, 30 days if not shutdown	PTC No. 069-00001, 11/6/98	4.5

Operating Requirements

4.1 Fuel combusted in the temporary boilers shall be natural gas exclusively.

[PTC No. 069-00001, 11/6/98]

4.2 No more than two temporary boilers shall be operated at any given time and these boilers shall each have a heat capacity less than 100 MMBtu/hr. The boilers may be located at either the Consumer Products Division or the Idaho Pulp and Paper Division.

[PTC No. 069-00001, 11/6/98]

4.3 The temporary boilers may be operated for unlimited hours, anytime one or more of the permanent boilers are shut down. The temporary boilers may also be operated concurrently with all of the permanent boilers for up to 30 days total operating time in any 12-month period.

[PTC No. 069-00001, 11/6/98]

Monitoring and Recordkeeping

4.4 The permittee shall record the amounts of fuel combusted during each day.

[40 CFR 60.48c(g)]

4.5 For each temporary boiler, the permittee shall monitor and record the hours of operation, date of operation, and the operational status of all permanent boilers. This record shall be maintained onsite and shall be made available to DEQ representatives upon request.

[PTC No. 069-00001, 11/6/98]

5. CHEMICAL RECOVERY COMBUSTION SOURCES – 40 CFR 63 SUBPART MM

Summary Description

Chemicals used in the production of paper in the kraft pulp mill are recovered in a chemical recovery system. The chemical recovery system includes combustion sources that are regulated by the National Emissions Standards for Hazardous Air Pollutants. The sources that are affected by the standard are the No. 4 and No. 5 recovery furnaces, the No. 4 and No. 5 smelt dissolving tanks, and Lime Kilns No. 3 and No. 4.

The purpose of this section of the permit is to incorporate and summarize the applicable requirements of 40 CFR 63 Subpart MM. There are additional applicable requirements for these sources included in other sections of this permit.

Table 5.1 contains only a summary of the requirements that apply.

TABLE 5.1 40 CFR 63 SUBPART MM –SUMMARY OF APPLICABLE REQUIREMENTS FOR CHEMICAL RECOVERY COMBUSTION SOURCES AT KRAFT PULP MILLS

Affected Source	Standard	Control Device	Type of Monitoring	Corrective Action Threshold	Violation Threshold
#4 & #5 Recovery Furnace	PM – 0.044 gr/dscf @ 8% O_2	ESP	Continuous Opacity Monitoring	When the average of ten consecutive 6-minute averages are greater than 20% opacity	When Opacity is greater than 35% for 6% or more of the operating time in any quarter
#4 Smelt Tank	PM – 0.2 lb/T Black Liquor Solids	Wet Scrubber	Continuous Pressure Drop and Scrubbing Media Flow rate	When any 3-hour rolling average pressure drop or scrubbing media flow rate is outside of ranges established through testing.	When 6 or more rolling 3-hour average pressure drop or scrubbing media flow rate values are outside of ranges established through testing within any 6-month reporting period.
#5 Smelt Tank	PM – 0.2 lb/T Black Liquor Solids	Wet Scrubber	Continuous monitoring of percent of load to the fan motor and Scrubbing Media Flow rate	When any 3-hour rolling average operating parameter is outside of ranges established through testing.	When 6 or more rolling 3-hour average operating parameter is outside of a range established through testing within any 6-month reporting period.
#3 & #4 Lime Kiln	PM – 0.064 gr/dscf @ 8% O_2	ESP	Continuous Opacity Monitoring	When the average of ten consecutive 6-minute averages are greater than 20% opacity	When Opacity is greater than 35% for 6% or more of the operating time in any quarter

Emission Limits

5.1 In accordance with 40 CFR 63.862(a)(1)(i)A PM emissions from recovery furnace No. 4 and No. 5 shall be less than or equal to 0.044 grain per dry standard cubic foot corrected to 8 percent oxygen.

[40 CFR 63.862(a)(1)(i)A]

5.2 In accordance with 40 CFR 63.862(a)(1)(i)B PM emissions from smelt dissolving tanks No. 4 and No. 5 shall be less than or equal to 0.2 pound per ton of black liquor solids fired.

[40 CFR 63. 862(a)(1)(i)B]

5.3 In accordance with 40 CFR 63.862(a)(1)(i)C PM emissions from Lime Kilns No. 3 and No. 4 shall be less than or equal to 0.064 grain per dry standard cubic foot corrected to 10 percent oxygen.

[40 CFR 63. 862(a)(1)(i)C]

5.4 As an alternative to the 40 CFR 63.862(a)(1)(i) emission limits (Permit Conditions 5.1 through 5.3), in accordance with 40 CFR 63.862(a)(ii) the permittee may seek DEQ approval of alternative emission limits by using the methods in 40 CFR 63.865(a)(1) and (2).

[40 CFR 63. 862(a)(1)(ii)]

Monitoring Requirements

5.5 The permittee shall establish scrubber parameter operating ranges for the No. 4 and No. 5 smelt tank in accordance with 40 CFR 864(j). The permittee may establish expanded or replacement operating ranges, provided that test data used to establish the operating ranges are obtained using the test methods required by 40 CFR 63.865.

[40 CFR 63. 864(j)]

5.6 The permittee shall establish operating ranges for the scrubber compliance indicators listed in Table 5.2 in accordance with 40 CFR 864(j). The permittee may establish expanded or replacement operating ranges, provided that test data used to establish the operating ranges are obtained using the test methods required by 40 CFR 63.865. Table 5.2 details the operating ranges that have been established.

TABLE 5.2 NO. 4 AND NO. 5 SMELT TANK SCRUBBER OPERATING RANGES

Emission Unit	Compliance Indicator	Indicator Range for Exceedance
#4 Smelt Tank	Scrubbing media flow rate	< 43[a] gpm, any 3-hr average (rolling average) parameter value
	Pressure drop	< 17[a] inches water gage, any 3-hr average (rolling average) parameter value
#5 Smelt Tank	Scrubbing media flow rate	<350[b] gpm, any 3-hr average (rolling average) parameter value
	Percent of load to fan motor	Percent of load to the fan motor < 55%[c], any 3-hr average (rolling average) parameter value

a. DEQ approved source test April 4, 2005
b. DEQ approved source test May 16, 2005
c. April 13, 2007 letter from Nancy Helm of EPA to Steven Waldher, Clearwater (formerly Potlatch)

[40 CFR 63. 864(j)]

5.7 The permittee shall install, calibrate and maintain a continuous opacity monitoring system on each affected recovery furnace or lime kiln equipped with an ESP (recovery furnace No. 4 and No. 5, and lime kilns No. 3 and No.4) in accordance with 40 CFR 63.864(d).

[40 CFR 63. 864(d)]

5.8 The permittee shall install, calibrate and operate a continuous parameter monitoring system for the compliance indicators listed in Table 5.2 that can be used to determine and record the compliance indicator at least once every successive 15-minute period in accordance with 40 CFR 63.864(e)(10).

[40 CFR 63.864(e)(10)]

5.8.1 The monitoring device used for the continuous measurement of the pressure drop of the gas stream across the scrubber must be certified by the manufacturer to be accurate to within a gage pressure of plus or minus 2 inches of water gage pressure in accordance with 40 CFR 63. 864(e)(10)(i).

5.8.2 The monitoring device used for continuous measurement of the scrubbing liquid flow rate must be certified by the manufacturer to be accurate within plus or minus 5 percent of the design scrubbing media flow rate in accordance with 40 CFR 63.864(e)(10)(ii).

[40 CFR 63. 864(e)(10)]

5.9 The permittee shall establish the scrubbing operating parameter ranges for the wet scrubbers on the No. 4 and No. 5 smelt tank in accordance with 40 CFR 63.864(j).

[40 CFR 63. 864(j)]

5.10 The permittee shall implement corrective action as specified in the startup, shutdown, and malfunction plan if the following monitoring exceedances occur:

- The average of ten consecutive 6-minute averages result in a measurement greater than 20 percent opacity from the No. 4 and No. 5 recovery furnaces and No. 3 and No. 4 lime kilns.
- When any 3-hour average (rolling average) pressure drop or scrubbing liquid flow rate is outside the range of values established through testing.
- The percent of load to the No. 5 smelt tank scrubber fan motor is below 55 percent on a 3-hour average (rolling average).

[40 CFR 63. 864(k)(1)]

5.11 A violation of the standards of 40 CFR 63.862 are occurring if the following monitoring exceedances occur:

- The average of ten consecutive 6-minute averages result in a measurement greater than 35 percent for 6 percent or more of the operating time within any quarterly period for the No. 4 and No. 5 recovery furnaces and No. 4 lime kiln.
- When 6 or more 3-hour average (rolling average) compliance indicators listed in Table 5.2 are outside of established operating ranges within any 6-month reporting period for the No. 4 and No. 5 smelt tanks.

For purposes of determining the number of nonopacity monitoring exceedances, no more than one exceedance will be attributed in any given 24-hour period.

[40 CFR 63. 864(k)(2)&(3)]

Record Keeping Requirements

5.12 The permittee shall develop a startup, shutdown, and malfunction plan in accordance with 40 CFR 63.866(a). The plan shall include a program of corrective action that will be taken for malfunctioning process and control systems. The plan shall include:

- Procedures for responding to operating parameters that are outside of the ranges established for the No. 4 and No. 5 smelt tank.
- Procedures for determining and recording the cause of an operating parameter exceedance and the time the exceedance began and ended.
- Corrective action to be taken in the event of an operating parameter exceedance.
- A maintenance schedule for routine and long term maintenance of air pollution control equipment that is consistent with manufacturer instructions and recommendations.
- An inspection schedule for each continuous monitoring system to assure it is properly functioning at least once in each 24-hour period.

[40 CFR 63. 866(a)]

5.13 The permittee shall maintain records for the following in accordance with 40 CFR 63.866:

- All occurrences when corrective action is required.
- Records of black liquor solids firing rates in units of Mg/d or ton/d for all recovery furnaces.
- CaO production rates in units of Mg/d or ton/d for lime kiln No. 3 and No.4.
- Records of scrubber parameter monitoring data, including any period when operating inconsistent with ranges established along with a brief explanation of the cause, the time it occurred, the time corrective action was initiated and completed, and the corrective action taken.
- Records of compliance determinations (including calculations).

[40 CFR 63. 866]

Reporting Requirements

5.14 The permittee shall report quarterly if the measured parameters meet any of the conditions specified in permit conditions 5.10 and 5.11 in accordance with 40 CFR 63.867(c). When no exceedance of parameters has occurred, the permittee must submit a semiannual report stating that no excess emissions occurred during the reporting period.

[40 CFR 63. 867(c)]

General Compliance

5.15 Should there be a conflict between 40 CFR 63 and Permit Conditions in Section 5 of this permit then 40 CFR 63 shall govern including any applicable amendments to that regulation.

[40 CFR 63 Subpart MM]

5.16 Generally applicable reporting, record keeping and notification requirements of Subpart A of the National Emission Standards for Hazardous Air Pollutants (NESHAP, 40 CFR 63) that are applicable to Subpart MM are included in Table 5.3. The citations provided in the reference column are a comprehensive listing of all applicable general provision requirements that apply. However, the summaries in the comment column are not a comprehensive description of what is required.

[40 CFR 63.860 –Table 1]

TABLE 5.3 GENERAL PROVISIONS APPLICABILITY TO SUBPART MM[A] – 40 CFR 63.1-16

Citation Reference	Applies to Subpart S?	Comment
63.1(a)(1)	Yes	**Applicability Information – including but not limited to:** • No emission standard or other requirement established under this part shall be interpreted, construed, or applied to diminish or replace the requirements of a more stringent emission limitation or other applicable requirement established by the Administrator pursuant to other authority of the Act (section 111, part C or D or any other authority of this Act), or a standard issued under State authority. • For the purposes of this part, if an explicit postmark deadline is not specified in an applicable requirement for the submittal of a notification, application, test plan, report, or other written communication to the Administrator, the owner or operator shall postmark the submittal on or before the number of days specified in the applicable requirement. • Notwithstanding time periods or postmark deadlines specified in this part for the submittal of information to the Administrator by an owner or operator, or the review of such information by the Administrator, such time periods or deadlines may be changed by mutual agreement between the owner or operator and the Administrator. Procedures governing the implementation of this provision are specified in §63.9(i).
63.1(a)(2)-(14)	Yes	
63.1(b)(2)–(3)	Yes	
63.1(c)(1)–(2)	Yes	
63.1(c)(4)–(5)	Yes	
63.1(e)	Yes	
63.2	Yes	**Definitions**
63.3	Yes	**Units and abbreviations**
63.4	Yes	**Prohibited activities and circumvention – including but not limited to:** No owner or operator subject to the provisions of this part shall build, erect, install, or use any article, machine, equipment, or process to conceal an emission that would otherwise constitute noncompliance with a relevant standard. Such concealment includes, but is not limited to the use of diluents to achieve compliance with a relevant standard based on the concentration of a pollutant in the effluent discharged to the atmosphere.
63.5(a)	Yes	**Preconstruction review and notification requirements – including but not limited to:** • This section implements the preconstruction review requirements of section 112(i)(1). After the effective date of a relevant standard, promulgated pursuant to section 112(d), (f), or (h) of the Act, under this part, the preconstruction review requirements in this section apply to the owner or operator of new affected sources and reconstructed affected sources that are major-emitting as specified in this section. • After the effective date of any relevant standard promulgated by the Administrator under this part, no person may, without obtaining written approval in advance from the Administrator in accordance with the procedures specified in paragraphs (d) and (e) of this section, do any of the following: 1) Construct a new affected source that is major-emitting and subject to such standard; 2) Reconstruct an affected source that is major-emitting and subject to such standard
63.5(b)(1)	Yes	
63.5(b)(3)	Yes	
63.5(b)(4)–(6)	Yes	
63.5(d)	Yes	
63.5(e)	Yes	
63.5(f)	Yes	
63.6(a)(1)&(2)	Yes	**Compliance with standards and maintenance – Including but not limited to:** • At all times, including periods of startup, shutdown, and malfunction, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. • The owner or operator of an affected source must develop a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction; and a program of corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with the relevant standard
63.6(b)	Yes	
63.6(c)	Yes	
63.6(e)-(j)	Yes	
	Yes	

63.7(a)(1)-(3) 63.7(b)(1)-(2) 63.7(c)-(h)	Yes	**Performance testing requirements – Including but not limited to:** The owner or operator of an affected source must notify the Administrator in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is initially scheduled to begin to allow the Administrator, upon request, to review and approve the site-specific test plan required under paragraph (c) of this section and to have an observer present during the test.
63.8(a)-(d)	Yes	**Monitoring requirements – Including but not limited to:** The owner or operator of an affected source shall maintain and operate each CMS as specified in this section, or in a relevant standard, and in a manner consistent with good air pollution control practices. • The owner or operator of an affected source must maintain and operate each CMS as specified in §63.6(e)(1). •The owner or operator must keep the necessary parts for routine repairs of the affected CMS equipment readily available. •The owner or operator of an affected source must develop a written startup, shutdown, and malfunction plan for CMS as specified in §63.6(e)(3). All CMS shall be installed, operational, and the data verified as specified in the relevant standard either prior to or in conjunction with conducting performance tests under §63.7. Verification of operational status shall, at a minimum, include completion of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system. The owner or operator of an affected source that is required to use a CMS and is subject to the monitoring requirements of this section and a relevant standard shall develop and implement a CMS quality control program. As part of the quality control program, the owner or operator shall develop and submit to the Administrator for approval upon request a site-specific performance evaluation test plan for the CMS performance evaluation required in paragraph (e)(3)(i) of this section, according to the procedures specified in paragraph (e). In addition, each quality control program shall include, at a minimum, a written protocol that describes procedures for each of the following operations: (i) Initial and any subsequent calibration of the CMS; (ii) Determination and adjustment of the calibration drift of the CMS; (iii) Preventive maintenance of the CMS, including spare parts inventory; (iv) Data recording, calculations, and reporting; (v) Accuracy audit procedures, including sampling and analysis methods; and (vi) Program of corrective action for a malfunctioning CMS.
63.8(e)(1)-(5)	Yes	
63.8(f)	Yes	
63.8(g)	Yes	
63.9(a)-(f)	Yes	**Notification requirements - Including but not limited to:** The owner or operator of an affected source shall notify the Administrator in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin to allow the Administrator to review and approve the site-specific test plan required under §63.7(c), if requested by the Administrator, and to have an observer present during the test. The owner or operator of an affected source required to use a CMS by a relevant standard shall furnish the Administrator written notification of the date the CMS performance evaluation under §63.8(e) is scheduled to begin, submitted simultaneously with the notification of the performance test date required under §63.7(b). If no performance test is required, or if the requirement to conduct a performance test has been waived for an affected source under §63.7(h), the owner or operator shall notify the Administrator in writing of the date of the performance evaluation at least 60 calendar days before the evaluation is scheduled to begin.
63.9(g)(1)-(3)	Yes	
63.9(h)-(j)	Yes	
63.9(e)	Yes	
63.9(g)(1)-(3)	Yes	
63.9(h)	Yes	
63.9(i)	Yes	
63.9(j)	Yes	
63.10(a)	Yes	**Recordkeeping and reporting requirements - Including but not limited to:** The owner or operator of an affected source subject to the provisions of this part shall maintain files of all

63.10(b)	Yes	information (including all reports and notifications) required by this part recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The owner or operator of an affected source subject to the provisions of this part shall maintain relevant records for such source of—
63.10(c)	Yes	
63.10(d)(1)	Yes	(i) The occurrence and duration of each startup or shutdown when the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards;
63.10(d)(2)	Yes	
63.10(d)(4)	Yes	(ii) The occurrence and duration of each malfunction of operation (*i.e.* , process equipment) or the required air pollution control and monitoring equipment;
63.10(d)(5)	Yes	(iii) All required maintenance performed on the air pollution control and monitoring equipment;
63.10(e)	Yes	(iv)(A) Actions taken during periods of startup or shutdown when the source exceeded applicable emission limitations in a relevant standard and when the actions taken are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan (see §63.6(e)(3)); or
63.10(f)	Yes	(B) Actions taken during periods of malfunction (including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation) when the actions taken are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan (see §63.6(e)(3) The owner or operator of an affected source required to install a CMS by a relevant standard shall submit an excess emissions and continuous monitoring system performance report and/or a summary report to the Administrator semiannually (All excess emissions reports shall be delivered or postmarked by the 30th day following the end of each calendar half per40 CFR 6310(e)(3)).
63.12–63.15	Yes	Delegations; Addresses; Incorporation by reference; Availability of information and confidentiality; and Performance Track Provisions

Wherever subpart A specifies "postmark" dates, submittals may be sent by methods other than the U.S. Mail (e.g., by fax or courier). Submittals shall be sent by the specified dates, but a postmark is not required

6. NO. 4 RECOVERY FURNACE AND NO. 4 SMELT DISSOLVING TANK

Table 6.1 describes the devices used to control emissions from the No. 4 Smelt Tank.

TABLE 6.1 EMISSION UNITS AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emissions Units(s)/Process(es)	Emission Control Device
189	Babcock & Wilcox recovery furnace, started up November 1970	Electrostatic precipitator
157	Research Cottrell smelt-dissolving tank, started November 1970	High-efficiency wet scrubber

Table 6.2 contains a summary of the requirements that apply to these sources. Specific requirements are listed below Table 6.2. The smelt dissolving tank is also regulated in Section 19 of the permit.

TABLE 6.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
6.1	PM from recovery furnace	0.040 gr/dscf at 8% oxygen 4 lb/T ADP	7/5/79 PTC & IDAPA 58.01.01.821	6.7, & Permit Section 19
6.2	TRS from recovery furnace	15 ppm 0.5 lb sulfur/T ADP	7/5/79 PTC & IDAPA 58.01.01.819	6.5, 6.6
6.3	PM from smelt-dissolving tank	0.070 gr/dscf 0.4 lb/T ADP	7/5/79 PTC & IDAPA 58.01.01.823	6.7, & Permit Section 19
6.4	Opacity from recovery furnace	40% for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625.02	6.5

Emission Limits

6.1 The PM emissions from the recovery furnace shall not exceed 0.040 gr/dscf at 8% oxygen or 4 lb/ADT of equivalent air dried pulp in accordance with IDAPA 58.01.01.821.

[PTO No. 13-1140-0001, 7/5/79 & IDAPA 58.01.01.821]

6.2 The TRS from the recovery furnace shall not exceed 15 ppm (as H_2S on dry basis) maximum daily average or 0.5 lb Sulfur/T of equivalent air dried pulp in accordance with IDAPA 58.01.01.819.

[PTO No. 13-1140-0001, 7/5/79 & IDAPA 58.01.01.819(State Only)]

6.3 The PM emissions from the smelt-dissolving tank shall not exceed 0.070 gr/dscf or 0.5 lb/ADT of equivalent air dried pulp in accordance with IDAPA 58.01.01.823.

[PTO No. 13-1140-0001, 7/5/79 & IDAPA 58.01.01.823]

6.4 Opacity from the recovery furnace shall not exceed 40% for a period or periods aggregating more than three minutes in any 60-minute period.

[IDAPA 58.01.01.625.02]

Monitoring and Recordkeeping

6.5 The permittee shall continuously monitor and record opacity and TRS from the recovery furnace.
[PTO No. 13-1140-0001-03, 7/5/79]

6.6 The permittee shall calculate and record the daily average pounds of sulfur emitted from the No. 4 Recovery Furnace per ton of air dried pulp processed. The continuous TRS monitoring data shall be used to determine sulfur emissions.
[IDAPA 58.01.01.322.06]

6.7 The permittee shall conduct a PM performance test on each source at worst-case normal operating conditions, in accordance with the procedures in 40 CFR 60, Appendix A, Method 5. The tests shall be conducted within 12 months of issuance of this permit to demonstrate compliance with Permit Conditions 6.1 and 6.3. If the emissions measured in the initial test are less than 50% of the emission limit, no further testing shall be required during this permit term. If the emissions measured during the most recent tests are between 50% and 80% of the standard, a second test shall be required in the third year of the permit term. If the initial test exceeds 80% of the standard, an annual test shall be required.

In accordance with IDAPA 58.01.01.157 the tests shall be conducted at worst-case normal operating conditions. During the test the permittee shall monitor the tons of air dried pulp processed during the test. During the test opacity shall be continually monitored and recorded from the #4 Recovery Furnace, and the pressure drop and scrubbing media flow rate shall be monitored and record for the #4 Smelt Tank scrubber so that data is available to assess compliance with Permit Condition 19.9. The CAM indicators monitored during the test shall be reported with the test results.
[IDAPA 58.01.01.322.09]

7. NO. 5 RECOVERY FURNACE

Table 7.1 describes the devices used to control emissions from No. 5 Recovery Furnace.

TABLE 7.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emission Units	Emission Control Device
721	Gotaverken Energy Systems recovery furnace, started up June 1987	Electrostatic precipitator rated at 99.7% efficiency

Table 7.2 contains a summary of the requirements that apply to these sources. Specific requirements are listed below Table 7.2. The recovery furnace is also regulated by Section 5 and 19 of the permit.

TABLE 7.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
7.1	PM	58 lb/hr; 0.03 gr/dscf	PTC dated May 6, 1983	7.14 & CAM requirements of Section 19
7.2	PM	0.044 gr/dscf at 8% oxygen	40 CFR 60.282(a)(1)(i) 40 CFR 63.862(a)(1)(i)(A) after March 14, 2004	7.14 & CAM requirements of Section 19
7.3	PM	4 lb/T ADP	IDAPA 58.01.01.821	7.14 & CAM requirements of Section 19
7.4.1	Opacity	35%	40 CFR 60.282(a)(1)(ii)	7.12
7.4.2	Opacity	40%	IDAPA 58.01.01.625.02	7.12
7.5	CO	880 lb/hr, 3850 T/yr, 900 ppm	PSD permit X-84-01	7.11
7.6	SO_2	112 lb/hr, 490 T/yr, 50 ppm	PSD permit X-84-01, later revised	7.11
7.7	NO_x	160 lb/hr, 700 T/yr, 100 ppm	PSD permit X-84-01, later revised	7.14
7.8	PSD pollutants	Emit at less than significant net emissions increase levels	PSD permit X-84-01	7.12, 7.14
7.9	TRS	5 ppm at 8% oxygen	40 CFR 60.283(a)(2)	7.12
7.10	TRS	0.5 lb sulfur/T ADP	IDAPA 58.01.01.819	7.12; 7.13

Emission Limits

7.1 The PM emissions from the No. 5 recovery furnace shall not exceed 58 lb/hr or 0.03 gr/dscf.

[Permit No. 1140-0001, 5/6/83]

7.2 The PM emissions from the No. 5 recovery furnace shall not exceed 0.044 gr/dscf corrected to 8% oxygen.

[40 CFR 60.282(a)(1)(i) ; 40 CFR 63.862(a)(1)(i)(A)]

7.3 The PM emissions from the No. 5 recovery furnace shall not exceed 4 lb/T ADP.

[IDAPA 58.01.01.821]

7.4 Opacity Limits

7.4.1 Opacity from the No. 5 recovery furnace stack shall not exceed 35%. Emissions in excess of this limitation are not considered a violation provided the conditions in 40 CFR 60.284(e) are met.

[40 CFR 60.282(a)(1)(ii)]

7.4.2 Opacity from the recovery furnace shall not exceed 40% for a period or periods aggregating more than three minutes in any 60-minute period.

[IDAPA 58.01.01.625.0200]

7.5 The CO emissions from the No. 5 recovery furnace shall not exceed 880 lb/hr, 3,850 T/yr, or 900 ppm on a dry basis at 8% oxygen. The hourly and concentration limits shall be averaged over each 24-hour day.

[PSD permit X-84-01, 12/3/84]

7.6 The SO_2 emissions from the No. 5 recovery furnace shall not exceed 112 lb/hr, 490 T/yr, or 50 ppm on a dry basis at 8% oxygen. The hourly and concentration limits shall be averaged over each 24-hour day.

[PSD permit X-84-01, 12/3/84, revised 10/17/94]

7.7 The NO_x emissions from the No. 5 recovery furnace shall not exceed 160 lb/hr, 700 T/yr or 100 ppm, dry basis at 8% oxygen. The hourly and concentration limits are determined by EPA Method 7.

[PSD permit X-84-01, 12/3/84, revised 10/17/94]

7.8 With exception of NO_x, CO, and SO_2 increases in potential emission of any pollutant regulated under the Clean Air Act resulting from construction of the No. 5 Recovery Boiler will be less than the significant levels [Section 52.21(b)(23)(i)].

[PSD permit X-84-01, 12/3/84]

7.9 The TRS emissions from the No. 5 recovery furnace shall not exceed 5 ppm by volume on a dry basis corrected to 8% oxygen. Emissions in excess of this limitation are not considered a violation provided the conditions in 40 CFR 60.284(e) are met.

[40 CFR 60.283(a)(2)]

7.10 The TRS emissions from the No. 5 recovery furnace shall not exceed 17.5 ppm (as H_2S) or 0.5 lb sulfur/T ADP, maximum daily average.

[IDAPA 58.01.01.819, State Only]

Monitoring and Recordkeeping

7.11 A continuous monitoring and recording system meeting the specification requirements in Appendix B of 40 CFR 60 shall be operated to monitor SO_2 and CO.

[PSD permit X-84-01, 12/3/84]

7.12 Continuous monitoring and recording systems meeting the specification requirements at 40 CFR 60.284(a) shall be operated to monitor opacity, TRS concentration, and oxygen percentage.

[40 CFR 60.284(a)(1) and (2)]

7.13 The permittee shall calculate and record the daily average pounds of sulfur emitted from the No. 5 Recovery Furnace per ton of air dried pulp processed. The continuous TRS monitoring data shall be used to determine sulfur emissions.

[IDAPA 58.01.01.322.06]

7.14 The permittee shall conduct a NO_x and PM performance test on the No. 5 recovery furnace at the maximum expected production rate in accordance with the procedures in 40 CFR 60, Appendix A, Methods 5 and 7, or DEQ approved alternative. The tests shall be conducted with 12 months of issuance of this permit to demonstrate compliance with Permit Conditions 7.1, 7.2, 7.3, and 7.7. If the emissions measured in the initial test are less than 50% of all emission limits, no further testing shall be required during this permit term. If the emissions measured in the initial test are between 50% and 80% of any standard, a second test shall be required in the third year of the permit term. If the initial test exceeds 80% of any standard, an annual test shall be required. During the PM performance test opacity shall be continually monitored and recorded so that data is available to assess compliance with Permit Condition 19.9. The CAM indicators monitored during the test shall be reported with the test results.

[IDAPA 58.01.01.322.06]

Reporting Requirements

7.15 In accordance with 40 CFR 60.284 the permittee shall record and report to the EPA and DEQ all 12-hour averages of TRS concentrations above five ppm by volume and all six-minute average opacities that exceed 35%.

- If the total duration of excess emission for the reporting period is less than 1% of the total operating time of the recovery furnace and the monitor downtime is less than 5% of the total operating time, then only a Summary Report Form need be submitted, as described in 40 CFR 60.7, Figure 1.
- If the total duration of excess emissions for the reporting period is 1% or greater of the total operating time of the recovery furnace or the monitor downtime is 5% or greater of the total operating time, then the Summary Report Form and the excess emission report described in 40 CFR 60.7(c) shall be submitted.
- Excess emissions are all 12-hour averages of TRS concentrations above 5 ppm by volume and 6-minute average opacities that exceed 35 percent
- Periods of excess emissions reported are not considered to be indicative of a violation provided that:

  (1) The percent of the total number of possible contiguous periods of excess emissions in a quarter (excluding periods of startup, shutdown, or malfunction and periods when the facility is not operating) during which excess emissions occur does not exceed one percent for TRS from recovery furnaces and does not exceed six percent for average opacities from recovery furnaces; and

(2) The DEQ determines that the affected facility, including air pollution control equipment, is maintained and operated in a manner which is consistent with good air pollution control practice for minimizing emissions during periods of excess emissions.

Should there be a conflict between any of the preceding requirements of Permit Condition 7.15 and 40 CFR 60.284(d) & (e) and 60.7(d), the CFR shall govern.

[40 CFR 60.284(d)& (e) and 60.7(d)]

7.16 The permittee shall notify DEQ of any occurrence of any emission in excess of limits specified in Condition 7.5, 7.6, 7.7 and 7.8; such notification shall be forwarded to DEQ in writing in a timely fashion and in each instance no later than ten days from the date of such occurrence. The notification shall include an estimate of the resultant emissions and a narrative report of the cause, duration and steps taken to correct the problem and avoid a recurrence. The permittee shall contemporaneously send a copy of all such reports to EPA.

[PSD permit X-84-01, 12/3/84]

8. NO. 5 SMELT-DISSOLVING TANK

Table 8.1 describes the devices used to control emissions from the No. 5 Smelt Tank.

TABLE 8.1 EMISSIONS UNIT AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emission Units	Emission Control Device
204	Gotaverken Energy Systems tank; started up June 1987	High efficiency wet scrubber

Table 8.2 contains a summary of the requirements that apply to No. 5 Smelt Tank. Specific requirements are listed below Table 8.2. The smelt dissolving tank is also regulated in Section 19 of the permit.

TABLE 8.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
8.1	PM	10.4 lb/hr and 45 T/yr	PTC, dated May 6, 1983	8.5, 8.6
8.2	PM	0.20 lb/T black liquor solids	40 CFR 60.282(a)(2) 40 CFR 63.862(a)(1)(i)(B)	8..5 (for 40 CFR 60.282(a)(2) only), 8.6
8.3	PM	0.5 lb/T ADP	IDAPA 58.01.01.823	8..5, 8.6
8.4	TRS	0.033 lb/T black liquor solids	40 CFR 60.283(a)(4)	8.5, 8.7

Emission Limits

8.1 The PM emissions from the smelt-dissolving-tank vent shall not exceed 10.4 lb/hr and 45 T/yr.

[Permit 1140-0001, 5/6/83]

8.2 The PM emissions from the smelt-dissolving-tank vent shall not exceed 0.20 lb/T black liquor solids (dry weight).

[40 CFR 60.282(a)(2); 40 CFR 63.862(a)(1)(i)(B)]

8.3 The emission of particulate material from all smelt tanks shall not exceed one-half (1/2) pound per ton of equivalent air-dried pulp.

[IDAPA 58.01.01.823, 5/1/94]

8.4 The TRS emissions from the smelt-dissolving-tank vent shall not exceed 0.033 lb/T black liquor solids [40 CFR 60.283(a)(4)].

[40 CFR 60.283(a)(4)]

Monitoring and Recordkeeping

8.5 The permittee shall install, calibrate, maintain, and operate the following continuous monitoring systems in accordance with NSPS Subpart BB, or alternate system as approved by the Administrator in accordance with 40 CFR 60.13. Record once per shift measurements obtained form the devices installed under this condition:

[40 CFR 60.284(b)(1), 40 CFR 60.284(b)(4)]

(i) A monitoring device for the continuous measurement of the pressure drop of the gas stream through the control equipment. The monitoring equipment must be certified by the manufacturer to be accurate to within a gage pressure of ±2 inches of water gage pressure. (Note: 40 CFR Subpart MM has this exact monitoring requirement; however on April 13, 2007 EPA approved monitoring of the percent of fan load in lieu of pressure drop for purposes of 40 CFR 63, Subpart MM.)

[40 CFR 60.284(b)(2)(i)]

(ii) A monitoring device for the continuous measurement of the scrubbing-liquid supply pressure to the control equipment. The monitoring device is to be certified by the manufacturer to be accurate within ±15 percent of the design scrubbing-liquid supply pressure.

[40 CFR 60.284(b)(2)(ii)]

8.6 The permittee shall conduct PM performance tests on the No. 5 Smelt Tank at worst-case normal operating conditions, in accordance with the procedures in 40 CFR 60, Appendix A, Method 5 or DEQ approved alternative. The tests shall be conducted during the first and third year of the permit term to demonstrate compliance with Permit Conditions 8.1, 8.2, and 8.3.

In accordance with IDAPA 58.01.01.157 the tests shall be conducted at worst-case normal operating conditions. During the test the permittee shall monitor and record the tons of air dried pulp and black liquor solids processed during the test, percent of fan motor load, and scrubbing media flow rate. The CAM indicators monitored during the test shall be reported with the test results.

[IDAPA 58.01.01.824.02 & IDAPA 58.01.01.322.06]

8.7 The permittee shall conduct TRS performance tests on the No. 5 Smelt Tank at the maximum expected production rate using EPA method 16A/6C bag sample or Department approved alternative. Tests shall be conducted during each 12 months of the term of the permit.

In accordance with IDAPA 58.01.01.157 the tests shall be conducted at worst-case normal operating conditions. During the tests the permittee shall monitor and record the pounds black liquor solids processed, the scrubbing media flow rate and the percent of fan motor load.

[IDAPA 58.01.01.322.06]

9. NO. 4 AND 5 RECOVERY FURNACE SALT-CAKE SYSTEMS

Table 9.1 describes the devices used to control emissions from the No. 4 and No. 5 Recovery Furnace Saltcake Systems.

TABLE 9.1 EMISSIONS UNIT AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emission Units	Emission Control Device
NA	Nos. 4 and 5 Salt-cake day silos	Baghouses

Table 9.2 contains a summary of the requirements that apply to these sources. Specific requirements are listed below Table 9.2.

TABLE 9.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
9.1	PM and PM_{10}	pound-per-hour and ton-per-year limits	PTC No. 069-0001	9.2 through 9.8
9.2 and 9.3	Throughput	tons-per-month and tons-per-year limits	PTC No. 069-0001	9.7

Emission Limits

9.1 The PM and PM_{10} emissions from the No. 4 recovery furnace salt-cake-system-baghouse stack shall not exceed 1.0 lb/hr and 2.0 T/yr and 2.0 lb/hr and 5.1 T/yr for the No. 5 recovery furnace salt-cake system.

[PTC No. 069-00001, 1/29/97]

Operating Requirements

9.2 The maximum salt-cake throughput of the No. 4 recovery furnace salt-cake system shall not exceed 546 T/mo, or 4,250 T/yr.

[PTC No. 069-00001, 1/29/97]

9.3 The maximum salt-cake throughput of the No. 5 recovery furnace salt-cake system shall not exceed 1,650 T/mo, or 12,750 T/yr.

[PTC No. 069-00001, 1/29/97]

9.4 The PM emissions from the No. 4 and No. 5 recovery furnace-salt-cake systems shall each be controlled using an Ultra Industries baghouse (Model BB-16100-AAR-IIG) or equivalent, with a minimum control efficiency of 99.96%.

[PTC No. 069-00001, 1/29/97]

9.5 Each system baghouse shall be installed, operated and maintained in accordance with the manufacturer's recommendations, with the exception of the pressure drop. Each saltcake system

baghouse shall be installed, operated and maintained in accordance with the Operations and Maintenance (O&M) manual specified in Section 9.6 of this permit in order to determine compliance with the control efficiencies listed in Section 9.4 of this permit. All manufacturer's specification, operating and installation instructions shall be kept on-site for as long as each baghouse is used, and made available to DEQ representatives upon request.

[PTC No. 069-00001, 1/29/97]

9.6 The permittee shall have developed an O&M manual for the air pollution control device which describes the procedures that will be followed to comply with Section 9.5 of this permit. The O&M manual shall remain on-site at all times and copies shall be made available to DEQ representatives upon request.

[PTC No. 069-00001, 1/29/97]

Monitoring Requirements

9.7 The permittee shall monitor and record monthly, the amount of salt cake fed to the No. 4 recovery furnace mix tank and the No. 5 recovery furnace mix tank from their respective day tanks in tons to determine compliance with Permit Conditions 9.2 and 9.3. All records shall remain onsite for a minimum five-year period and shall be made available to DEQ representatives upon request.

[PTC No. 069-00001, 1/29/97]

9.8 The permittee shall install, calibrate, maintain, and operate a monitoring device for the continuous measurement of the pressure drop across each salt-cake-system-baghouse. The pressure monitoring devices shall be certified by the manufacturer to be accurate within 1 inch of water gauge pressure, and shall be calibrated on an annual basis in accordance with manufacturer instructions. The pressure drops shall be recorded at a minimum of once per day while each recovery furnace salt-cake system is operating at normal capacity. All records shall remain onsite for a minimum five-year period and shall be made available to DEQ representatives upon request.

[PTC No. 069-00001, 1/29/97]

10. LIME KILNS NOS. 3 AND 4

Table 10.1 describes the devices used to control emissions from Lime Kilns No. 3 and 4.

Table 10.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emission Units	Emission Control Device
511	No. 3 lime kiln, natural gas, oil, and coke-fired	Electrostatic precipitator
512	No. 4 lime kiln, natural gas, oil, and coke-fired	Electrostatic precipitator, packed-bed scrubber

Table 10.2 contains a summary of the requirements that apply to these sources. Lime Kilns No. 3 and 4 are also subject to the NESHAP for Chemical Recovery Combustion Sources and Kraft Pulp Mills in Section 5 of this permit. Lime Kilns No. 3 and No. 4 are also regulated in Section 19 of this permit.

Table 10.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
10.1	PM, PM_{10}, SO_2, NO_x, CO, and TRS	pound-per-hour and tons-per year limits	PTC No. 069-0001	10.8 - 10.25
10.2	TRS	40 ppm at 10% oxygen for kiln No. 3, 50 ppm at 10% oxygen for kiln No. 4	PTC No. 069-00001	10.21-24, 10.28, 10.29
10.3	Opacity	25% for kiln No. 3 and 20% for kiln No. 4 for no more than three minutes in any 60-minute period	PTC No. 069-00001	10.19
10.4	SO_2 for kiln No. 4	20 ppm by volume	PTC No. 069-00001	10.20
10.5	PM	1.0 lb/T ADP	PTC No. 069-00001	10.13-15
10.6	Throughput	10.5 T/hr each and 175,200 T/yr combined	PTC No. 069-0001	10.16

Emission Limits

10.1 Emissions of PM, PM_{10}, SO_2, NO_X, CO, and TRS from the Allis (Svedala) No. 3 and No. 4 lime kiln stacks shall not exceed any corresponding emission rate limits in the Table 10.3.

Table 10.3 EMISSION LIMITS[a] - HOURLY (LB/HR) AND ANNUAL[b] (T/YR)

Source Description	PM		PM_{10}		SO_2		NO_X		CO		TRS
	lb/hr	T/yr	lb/hr	T/yr	lb/3-hr	T/yr	lb/day	T/yr	lb/12 hr	T/yr	T/yr
No. 3 lime kiln	5.2	27[c]	5.2	17.3[c]	153	21	766	113[c]	80.4	44[c]	12.6[c]
No. 4 lime kiln	5.2	27[c]	5.2	17.3[c]	10.4	15	766	113[c]	80.4	44[c]	12.6[c]

[a] As determined by a pollutant-specific EPA reference method, or DEQ-approved alternative, or as determined by the DEQ's emission estimation methods used in this permit analysis.
[b] As determined by multiplying the actual or allowable (if actual is not available) lb/hr emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.
[c] T/yr limit is for combined emissions from the No. 3 and No. 4 lime kilns

[PTC No. 069-00001, 2/27/03]

10.2 The concentration of TRS compounds in the No. 3 lime kiln effluent shall not exceed 40 ppm by volume on a dry basis corrected to 10% oxygen as a monthly average, and 50 ppm by volume from the No. 4 lime kiln.

[PTC No. 069-00001, 2/27/03]

10.3 Emissions shall not exceed 25% opacity from the No. 3 lime kiln stack and 20% from the No. 4 lime kiln stack for a period or periods aggregating more than three minutes in any 60-minute period. Opacity shall be determined by a COMS as specified in Permit Condition 10.19 and by the procedures contained in IDAPA 58.01.01.625.04.

[PTC No. 069-00001, 2/27/03]

10.4 The SO_2 concentrations in the effluent of the No. 4 lime kiln stack shall not exceed 20 ppm by volume, three-hour average.

[PTC No. 069-00001, 2/27/03]

10.5 The PM emissions from the lime kiln stacks shall not exceed 1 lb/T ADP.

[IDAPA 58.01.01.822]

Operating Requirements

10.6 The maximum hourly throughput of CaO for the lime kilns shall not exceed 10.5 T/hr each based on a 12-hour average. The maximum annual combined throughput of CaO to the No. 3 lime kiln and the No. 4 lime kiln shall not exceed 175,200 tons per any consecutive 12-month period.

[PTC No. 069-00001, 2/27/03]

10.7 The NCGs shall be treated in the following manner:

10.7.1 The NCGs shall not be routed through or processed by the No. 3 lime kiln, except during periods when both the NCG incinerator and the No. 4 lime kiln are not operational due to maintenance, repair, upset, or breakdown.

10.7.2 NCG's shall not be routed through or processed by the No. 4 lime kiln, except during periods when the NCG incinerator is not operational due to maintenance, repair, upset or breakdown.

10.7.3 When NCGs are routed to the No. 3 or No. 4 Lime Kiln, such routing and treatment of NCGs, including transition operations, shall be conducted in an effective and efficient manner for the control of pollutants contained in NCGs or generated by the treatment of NCGs and in compliance with applicable provisions of 40 CFR 60, Subpart BB; 40 CFR 63, Subpart S; and IDAPA 58.01.01.815 through 826.

[PTC No. 069-00001, 2/27/03; 40 CFR 60.280; 40 CFR 63.860]

10.8 The permittee shall install, maintain, and operate, in accordance with manufacturer specifications, the following control equipment:

10.8.1 An ESP on the No. 3 and No. 4 lime kiln stacks to control PM emissions.

10.8.2 A scrubber on the No. 4 lime kiln stack to control SO_2 emissions from the No. 4 lime kiln. The scrubber shall be installed downstream of the ESP and shall be operated whenever NCGs are routed to the No. 4 lime kiln.

[PTC No. 069-00001, 2/27/03]

10.9 The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, the following:

10.9.1 For both lime kilns, monitoring equipment to continuously measure the voltage and amperage applied on both sides of each T/R set to the discharge electrodes and each ESP field.

10.9.2 For lime kiln No. 4, monitoring equipment to continuously measure the pH and flow rate of the solution used by the caustic scrubber.

[PTC No. 069-00001, 2/27/03]

10.10 Within 180 days after issuance of this permit, the permittee shall develop an O&M manual for the ESPs and the caustic scrubber which describes the procedures that will be followed to comply with General Provision 2 of this permit and the ESP and scrubber manufacturer operating specifications and requirements.

The O&M manual shall also include procedures to ensure and demonstrate that all emissions resulting from the treatment of NCGs routed to the No. 4 Lime Kiln are routed to the scrubber and the scrubber is functioning at its rated control efficiency when emissions reach the scrubber. The manual shall remain on site at all times and shall be made available to Department representatives upon request.

[PTC No. 069-00001, 2/27/03]

10.11 The voltage and amperage applied on both sides of each T/R set to the discharge electrodes shall be maintained within manufacturer and O&M manual specifications. Documentation of both the manufacturer and O&M manual voltage and amperage specifications shall remain onsite at all times and shall be made available to DEQ representatives upon request.

[PTC No. 069-00001, 2/27/03]

10.12 The pH and flow rate of the solution used in the No. 4 lime kiln caustic scrubber shall be maintained within manufacturer and O&M manual specifications. Documentation of the scrubber pressure drop and scrubber media pH and flow rate specifications shall remain onsite at all times and shall be made available to DEQ representatives upon request.

[PTC No. 069-00001, 2/27/03]

Monitoring and Recordkeeping Requirements

10.13 Periodic performance testing for PM and PM_{10} emissions from the lime kiln stacks shall be accomplished by the permittee as follows. Emissions of PM and PM_{10} shall be measured using EPA Test Methods 5, 201a, and 202 contained in 40 CFR 60, Appendix A, or comparable and equivalent methods approved in accordance with IDAPA 58.01.01.157. If the PM or PM_{10} measured in the most recent performance test is less than or equal to 75% of any respective particulate standard listed in Permit Condition 10.1 or 10.5, then the permittee shall conduct periodic performance tests every three calendar years beginning within three calendar years from the most recent test date. If the PM or PM_{10} measured in the most recent performance test is greater than 75% of any respective particulate standard listed in Permit Condition 10.1 or 10.5, then the permittee shall conduct periodic performance tests annually beginning within 12 months from the most recent test date. Annual performance tests shall be separated by a minimum of six months.

During the tests opacity shall be continually monitored and recorded so that data is available to assess compliance with Permit Condition 19.9. The CAM indicators monitored during the test shall be reported with the test results.

[PTC No. 069-00001, 2/27/03, IDAPA 58.01.01.824.02]

10.14 The permittee shall monitor and record the voltage and amperage applied by each T/R set to the discharge electrodes hourly. The voltage and amperage recorded shall be consistent with the manufacturer and O&M manual units of measure. A compilation of the most recent five years of voltage and amperage records shall be kept onsite and shall be made available to DEQ representatives upon request.

[PTC No. 069-000012/27/03]

10.15 The permittee shall monitor and record the scrubber media flow rate and pH hourly when the scrubber is in operation. The most recent 5 years of pressure drop, flow rate, and pH records shall be kept onsite and shall be made available to DEQ representatives upon request.

[PTC No. 069-00001, 2/27/03]

10.16 The permittee shall monitor and record the hourly throughput of CaO in the lime kilns, based on a 3-hour average, 12-hour average, 24-hour (daily) average, and the annual throughput of CaO to the lime kilns, based on a 12-month rolling average. The throughput data shall be used in the exhaust gas flow rate calculation required in Permit Condition 10.23. A compilation of the most recent five years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

[PTC No. 069-00001, 2/27/03]

10.17 When NCGs are treated by either lime kiln, the permittee shall monitor and record the date, time, and duration of treatment. The records shall also include an explanation why the NCG incinerator was not used to treat NCGs. A compilation of the most recent five years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

[PTC No. 069-00001, 2/27/03]

10.18 The permittee shall monitor and record the fuel-use rate of the No. 3 and No. 4 Lime Kilns based on a 3-hour average. The fuel usage data shall be used in the exhaust gas flow-rate calculation.

[PTC No. 069-00001, 2/27/03]

10.19 The permittee shall install, calibrate, maintain, and operate COMS on the lime kiln stacks. Except for COMS system breakdowns, repairs, maintenance, calibration checks, and zero and span adjustments, the COMS shall be in continuous operation whenever the lime kilns are in operation. The installation and performance evaluation of the COMS shall be conducted in accordance with the applicable performance specification in 40 CFR 60, Appendix B.

[PTC No. 069-00001, 2/27/03]

10.20 The permittee shall install, calibrate, maintain, and operate SO_2 and NO_x CEMS on the lime kiln stacks. The CEMS shall provide measurements on a dry parts per million basis. Except for CEMS breakdowns, repairs, maintenance, calibration checks, and zero and span adjustments, the CEMS shall be in continuous operation whenever the lime kilns are in operation. The installation and performance evaluation of the CEMS shall be conducted in accordance with Performance Specification 2, as applicable, in 40 CFR 60, Appendix B, and shall be operated in accordance with the requirements in 40 CFR 60, Appendix F. The CEMS, in combination with the exhaust gas flow-rate and emission rate calculations required by Permit Conditions 10.23 and 10.24, shall be capable of determining compliance with the NO_x and SO_2 limits of Permit Condition 10.1 and shall be able to achieve RA requirements as specified under Performance Specification 6. The exhaust flow rate equation shall be reviewed and updated if the permittee fails to achieve the minimum Performance Specification 6 RA.

[PTC No. 069-00001, 2/27/03]

10.21 The permittee shall install, calibrate, maintain, and operate a TRS CEMS on the lime kiln stacks. The CEMS shall provide TRS measurements on a dry ppm basis. Except for TRS CEMS breakdowns, repairs, maintenance, calibration checks, and zero and span adjustments, the TRS CEMS shall be in continuous operation whenever the lime kilns are in operation. The installation and performance evaluation of the CEMS shall be conducted in accordance with Performance Specification 5 in 40 CFR 60, Appendix B. The CEMS shall be capable of determining compliance with the TRS limit of Permit Condition 10.1 and shall be operated in accordance with the requirements in 40 CFR 60, Appendix F. A CGA may be substituted for the annual RATA requirement.

[PTC No. 069-00001, 2/27/03]

10.22 The permittee shall continuously monitor and record the temperature and oxygen concentration on a dry basis of emissions from the lime kiln stacks.

[PTC No. 069-00001, 2/27/03]

10.23 <u>Exhaust-gas Flow Rate Determination</u>

The permittee shall calculate the 3-hour and daily (24-hour) average exhaust-gas volumetric flow rates from the kiln stacks, using the following equation:

$$Q_s = (F_d a + 13750b)(20.9/(20.9 - c))$$

Where: Q_s = No. 3 Lime kiln exhaust gas volumetric flow rate (dscf)
F_d = F factor (dry basis) for fuel combusted as calculated using procedures

in 40 CFR 60, Appendix A, Method 19 or as provide in Method 19, Table 19-2.

a = No. 3 Lime kiln fuel heat input (MMBtu/averaging period) calculated from fuel use rate (R_f) and fuel higher heating value (HHV) as follows:

a = R_f (units/hr) x HHV (MMBtu/unit)

Fuel HHVs will be obtained from the fuel suppliers or determined through ultimate analysis. Fuel HHVs will be reviewed and updated (if necessary) at least annually.

b = No. 3 Lime kiln production rate (tons CaO/averaging period)

c = oxygen percent (dry basis) in the lime kiln exhaust gases

The accuracy of the calculation method shall be verified during CEM initial performance evaluations and at least annually during the CEMS performance evaluations required in Permit Conditions 10.20 and 10.21.

[PTC No. 069-00001, 2/27/03]

10.24 <u>NO_x, SO_2, and TRS Emission Rate Calculations</u>

The permittee shall calculate the 3-hour average and 12-month rolling actual SO_2 emission rates, the daily average and 12-month rolling actual NO_x emission rates, and the 12-month rolling actual TRS emission rate from the lime kilns using the average concentrations obtained from the CEMS required in Permit Conditions 10.20 and 10.21 and the calculated exhaust-gas flow rate required in Permit Condition 10.23 as follows:

$E_{hr} = C_s Q_s$ and $E_{yr} = \sum E_{hr} t$

Where:

E_{hr} = lb/hr mass emission rate for specified time averaging period.

E_{yr} = ton/yr mass emission rate (12-month rolling)

Q_s = dscf/hr flow rate as calculated under Permit Condition 10.23 for the specified time averaging period.

C_s = lb/dscf stack gas concentration for specified time averaging period determined as follows:

$C_{SO2} = (ppm_d\ SO_2)(1.660 \times 10^{-7})$

$C_{NOx} = (ppm_d\ NO_x)(1.194 \times 10^{-7})$

$C_{TRS} = (ppm_d\ TRS)(8.806 \times 10^{-8})$

t = applicable pollutant time averaging period (SO_2 = 3=hr, NO_x = 24-hr)

[PTC No. 069-00001, 2/27/03]

10.25 Periodic performance testing for CO emissions from each of the lime kiln stacks shall be accomplished by the permittee as follows. A test shall be conducted on each kiln within 12 months of issuance of this permit to demonstrate compliance with the carbon monoxide pound per 12-hour emission limit in Permit Conditions 10.1. If the CO measured in the most recent performance test is less than or equal to 75% of any respective particulate standard listed in Permit Condition 10.1, then the permittee shall conduct periodic performance tests every three calendar years beginning within three calendar years from the most recent test date. If the CO measured in the most recent performance test is greater than

75% of any respective particulate standard listed in Permit Condition 10.1, then the permittee shall conduct periodic performance tests annually beginning within 12 months from the most recent test date. Annual performance tests shall be separated by a minimum of six months. All testing shall be in accordance with Facility-Wide Permit Condition 1.10.

[IDAPA 58.01.01.322.09, 5/1/94]

Reporting Requirements

10.26 The permittee shall submit test protocols for the performance tests required in Permit Conditions 10.13 to DEQ for approval at least 30 days prior to the test date(s).

[PTC No. 069-00001, 2/27/03]

10.27 The permittee shall submit a semiannual CEMS report to DEQ in accordance with General Provision 24 that contains, but is not limited to, the following:

Calculated or measured emissions rates for all applicable averaging periods for NO_x, SO_2, and TRS. Emissions rates shall be calculated using CEMS data and calculated stack flow measurements as required in Permit Conditions 10.23 and 10.24. These records may be provided in electronic format.

[PTC No. 069-00001, 2/27/03]

10.28 The permittee shall submit to the Department a semiannual report providing the results from monitoring required by Permit Condition 10.17. The report may be in electronic format and shall include a summary that contains, but is not limited to, the total time and percent of time when NCGs were routed to and treated by the No. 3 Lime Kiln and No. 4 Lime Kiln. The report shall also contain any other information required by reporting requirements in 40 CFR 60, Subpart BB; 40 CFR 63, Subpart S; or IDAPA 58.01.01.

[PTC No. 069-00001, 2/27/03]

10.29 The permittee shall submit a semiannual report to DEQ that contains data and results of throughput monitoring required by Permit Condition 10.16.

[PTC No. 069-00001, 2/27/03]

11. LIME KILN NO. 2

Table 11.1 describes the devices used to control emissions from Lime Kiln No. 2.

TABLE 11.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emission Units	Emission Control Device
510	No. 2 lime kiln, natural gas-fired	Venturi scrubber

Table 11.2 contains a summary of the requirements that apply to these sources. Specific requirements are listed below Table 11.2. The No. 2 Lime Kiln is also regulated in Section 5 and 19 of the permit.

TABLE 11.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
11.1	PM	0.12 gr/dscf at 10% oxygen	PTC No. 069-00001	11.2 - 11.7

Emission Limits

11.1 Emissions of PM from the No. 2 lime kiln stack shall not exceed 0.12 gr/dscf at 10% oxygen.
[PTC No. 069-00001, 2/27/03]

Operating Requirements

11.2 Material processed by the No. 2 lime kiln shall be limited to lime rock only. Lime mud from the chemical recovery system of the kraft pulp mill shall not be processed by the No. 2 lime kiln.
[PTC No. 069-00001, 2/27/03]

11.3 The permittee shall maintain and operate the existing scrubber on the No. 2 lime kiln stack in accordance with manufacturer specifications.
[PTC No. 069-00001, 2/27/03]

11.4 The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, equipment to measure the liquor flow rate and the pressure drop across the scrubber.
[PTC No. 069-00001, 2/27/03]

Monitoring and Recordkeeping Requirements

11.5 If the No. 2 Lime Kiln is operated more than 30 days in any quarter, PM emissions from the No. 2 Lime Kiln stack shall be tested. Performance testing for PM emissions from the No. 2 Lime Kiln stack shall be accomplished by the permittee as follows. Emissions of PM from the No. 2 Lime Kiln stack shall be

measured using EPA Test Method 5, contained in 40 CFR Part 60, Appendix A, or such comparable and equivalent methods approved in accordance with IDAPA 58.01.01.157. If the PM measured in the most recent performance test is less than or equal to 75% of any respective particulate standard listed in Permit Condition 11.1, the permittee shall conduct periodic performance tests every three calendar years beginning within three calendar years from the most recent test date. If the PM measured in the most recent performance test is greater than 75% of any respective particulate standard listed in Permit Condition 11.1, the permittee shall conduct periodic performance tests annually beginning within 12 months from the most recent test date. Annual performance tests shall be separated by a minimum of six months. Performance tests conducted to demonstrate compliance shall be performed in accordance with IDAPA 58.01.01.157, General Provision 6 of this permit, and the following requirements:

11.5.1 Visible emissions shall be observed during each performance test run using the methods specified in IDAPA 58.01.01.625.

11.5.2 The scrubber-solution flow rate and the pressure drop across the scrubber on the No. 2 lime kiln stack shall be recorded during each performance test.

11.5.3 The throughput in tons per hour of lime rock to the No. 2 lime kiln shall be recorded during each performance test.

[PTC No. 069-00001, 2/27/03]

11.6 Each month, the permittee shall monitor and record the throughput of the No. 2 lime kiln for that month and for the most recent 12-month period. A compilation of the most recent five years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

[PTC No. 069-0001, 2/27/03]

11.7 The permittee shall submit a test protocol for the performance test required in Permit Condition 11.5 to DEQ for approval at least 30 days prior to the test dates.

[PTC No. 069-00001, 2/27/03]

12. LIME HANDLING AND SLAKING

Table 12.1 describes the devices used to control emissions from Lime Handling and Slaking.

TABLE 12.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emission Units	Emission Control Device
43	Lime slaker	Scrubber
47	Lime handling	Baghouse

Table 12.2 contains a summary of the requirements that apply to these sources. Specific requirements are listed below Table 12.2.

TABLE 12.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
12.1 & 12.2	PM/PM_{10} from slaker scrubber	1.72 lb/hr, 7.53 T/yr	PTC No. P-2009.0020	12.5, 12.6
12.4 & 12.5	Visible emissions	Maintenance required if VE exceed 5% from baghouse or 10% from scrubber	PTC No. P-2009.0020	12.6

Emission Limits

Slaker Scrubber Stack

12.1 Particulate emissions shall not exceed 1.72 pound per hour as determined by a U.S. EPA Reference Method 5, or Department approved alternative emission test, or as [determined in] the Department's emission estimation methods used in this permit analysis. Annual particulate emissions shall not exceed 7.53 tons per year as determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the actual hours per year that the process(es) which vent to this stack operate(s).

[PTC No. P-2009.0020, 4/13/09]

12.2 Fine (10 microns or less) particulate emissions shall not exceed 1.72 pounds per hour as determined by the Department's emission estimation methods used in this permit analysis. Annual fine particulate emissions shall not exceed 7.53 tons per year, as determined by multiplying the actual or allowable (if actual is not available) pounds per hour rate by the actual hours per year that the process(es) which vent to stack operate(s).

[PTC No. P-2009.0020, 4/13/09]

Operating Requirements

12.3 A baghouse shall be used to control emissions from lime handling.

[PTC No. P-2009.0020, 4/13/09]

12.4 Maintenance to the lime handling baghouse shall be performed if visible emissions from the lime handling stack exceeds 5 percent opacity.

[PTC No. P-2009.0020, 4/13/09]

12.5 Maintenance to the slaker scrubber shall be performed if visible emissions from the slaker scrubber stack exceeds 10 percent opacity.

[PTC No. P-2009.0020, 4/13/09]

Monitoring and Recordkeeping Requirements

12.6 The permittee shall conduct a visible emission observation of the lime-handling baghouse and the slaker scrubber stack once each calendar month. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If visible emissions are observed from either emissions point, a visible emissions observation using EPA Method 9 shall be conducted. If visible emissions exceed the opacity thresholds in Permit Condition 12.4 or 12.5 maintenance shall be performed as required by those permit conditions. Records of the visible emissions observations shall be maintained in accordance with General Provision 7. Records shall also be maintained on any maintenance that has been conducted.

[PTC No. P-2009.0020, 4/13/09]

13. TWELVE BATCH DIGESTERS, TWO CONTINUOUS DIGESTERS, MULTIPLE-EFFECT EVAPORATOR SYSTEM, TURPENTINE SYSTEM, AND FOUL CONDENSATE COLLECTION TANK – NONCONDENSABLE GAS INCINERATOR

Process Description

Low volume, high concentration gases may be combusted in a non-condensable gas incinerator. Emissions from the incinerator are controlled by a packed bed scrubber.

Sulfur dioxide emissions from this incinerator are limited by PTC No. P-060209 issued May 25, 2007. These emissions limitations are included in this section of the permit.

Emissions from digesters and multiple-effect evaporator systems, which are combusted in the incinerator, are regulated by IDAPA 58.01.01.815-826 – Rules for Control of Kraft Pulping Mills. These requirements have been included in this section of the permit.

The low volume, high concentration gases combusted in the incinerator originate from many process units, including units affected by NSPS Subpart BB.

Low volume, high concentration gases are also regulated by 40 CFR 63 Subpart S requirements which are included in Section 17 of this permit.

Table 13.1 describes the devices used to control emissions from the NCG incinerator.

TABLE 13.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point Identification	Emission Unit(s)/Process(es)	Emission Control Device
NA	NCG Incinerator	Packed bed scrubber

Table 13.2 contains a summary of requirements that apply to the NCG Incinerator. Specific permit requirements are listed below Table 13.2.

TABLE 13.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
13.2.1 (unless condition 13.2.2 is met)	TRS	TRS - 5 ppm;	40 CFR 60.283(a)(1)	13.3, 40 CFR 60.284(a)(2) (TRS CEMS)
13.2.2	TRS	Combust gases in lime kiln; or combust in an incinerator at 1200 °F for 0.5 seconds	40 CFR 60.283(a)(1)(iii)	13.3, 40 CFR 60.284(b)(1)
13.8	SO_2	4.70 lb/hr; 20 T/yr	P-060209, 5/25/07	13.9 & CAM requirements included in Section 19 of this permit
18	HAP	Section 18 of Permit	40 CFR 63 Subpart S	Section 18 of Permit

13.1 General Requirement

The permittee shall comply with 40 CFR 60 Subpart BB. The following Permit Conditions 13.2 to 13.4 apply to LVHC gas emissions from the multiple-effect evaporator system and No.9 batch digester. Should, there be a conflict between 40 CFR 60 Subpart BB and Permit Conditions 13.2 to 13.4, requirements in 40 CFR 60 Subpart BB shall govern.

The permittee shall comply with applicable General Provisions of 40 CFR 60.

[PTC No. P-060209, 5/25/07, 40 CFR 60 Subpart BB]

13.2 40 CFR 60.283 - Standard for Total Reduced Sulfur (TRS)

(a) On and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere:

(1) From any digester system, brown stock washer system, or multiple-effect evaporator system any gases which contain TRS in excess of 5 ppm by volume on a dry basis, corrected to 10 percent oxygen, unless the following conditions are met:

(i) and (ii) Do not apply because the lime kilns are not subject to this subpart; and LVHC gases do not route to a recovery furnace at the time of the permit issuance.

(iii) The gases are combusted with other waste gases in an incinerator or other device, or combusted in a lime kiln not subject to the provisions of this subpart, and are subjected to a minimum temperature of 650 °C (1200 °F) for at least 0.5 second; or

(iv) Do not apply to multiple-effect evaporator system.

(v) The gases from No.9 batch digester are not controlled by a means other than combustion; therefore this section does not apply.

(vi) The uncontrolled exhaust gases from a new, modified, or reconstructed digester system (i.e., No.9 batch digester) contain TRS less than 0.005 g/kg air dried pulp (ADP) (0.01 lb/ton ADP). (Note: at the time of permit issuance Clearwater did not anticipate utilizing this option to achieve compliance)

(2) and (3) Do not apply because LVHC gases do not route to a recovery furnace at the time of the permit issuance.

(4) Does not apply to multiple-effect evaporator system and No.9 batch digester.

(5) Does not apply because the lime kilns are not subject to this subpart at the time of the permit issuance.

[PTC No. P-060209, 5/25/07, 40 CFR 60.283]

13.3 40 CFR 60.284 - Monitoring of Emissions and Operations

(a) Does not apply because the permittee has chosen to comply with 40 CFR 60.283(a)(1)(iii).

(b) Any owner or operator subject to the provisions of this subpart shall install, calibrate, maintain, and operate the following continuous monitoring devices:

(1) For any incinerator, a monitoring device which measures and records the combustion temperature at the point of incineration of effluent gases which are emitted from multiple-effect evaporator system, or

No.9 batch digester where the provisions of 40 CFR 60.283(a)(1)(iii) apply. The monitoring device is to be certified by the manufacturer to be accurate within ±1 percent of the temperature being measured.

(2) Does not apply because the lime kilns are not subject to this subpart at the time of the permit issuance.

(c) Does not apply because the permittee has chosen to comply with 40 CFR 60.283(a)(1)(iii).

(d) For the purpose of reports required under 40 CFR 60.7(c), any owner or operator subject to the provisions of 40 CFR 60 Subpart BB shall report semiannually periods of excess emissions as follows:

(1) and (2) Do not apply to multiple-effect evaporator system.

(3) For emissions from any multiple-effect evaporator system, or No.9 batch digester periods of excess emissions are:

(i) Does not apply because the provisions of 40 CFR 60.283(a)(1) (i), (ii), or (iv) do not apply at the time of permit issuance.

(ii) All periods in excess of 5 minutes and their duration during which the combustion temperature at the point of incineration is less than 650 °C (1200 °F), where the provisions of 40 CFR 60.283(a)(1)(iii) apply.

(e) The Administrator will not consider periods of excess emissions reported under paragraph (d) of this section to be indicative of a violation of 40 CFR 60.11(d) provided that:

(1) Does not apply to multiple-effect evaporator system, or No.9 batch digester.

(2) The Administrator determines that the affected facility, including air pollution control equipment, is maintained and operated in a manner which is consistent with good air pollution control practice for minimizing emissions during periods of excess emissions.

(f) Does not apply because a continuous emissions monitoring system is not required when the permittee complies with 60.283(a)(1)(iii). Performance specification 1, 3, and 5 of appendix B of 40 CFR 60 are for emissions monitors, not for a temperature monitor.

[PTC No. P-060209, 5/25/07, 40 CFR 60.284]

Requirements for LVHC gas emissions from digesters and multiple-effect evaporator system taken from IDAPA58.01.01.815-826 – Rules for Control of Kraft Pulping Mills

13.4 General Requirement

The permittee shall comply with IDAPA58.01.01.815-826. The following Permit Conditions 13.5 and 13.6 apply to LVHC gas emissions from digesters and multiple-effect evaporator system. Should, there be a conflict between IDAPA58.01.01.815-826, and permit conditions 13.5 and 13.6, requirements in IDAPA58.01.01.815-826 shall govern.

[PTC No. P-060209, 5/25/07, IDAPA58.01.01.815-826]

13.5 IDAPA58.01.01.820 - Digester and Evaporator Standards

Noncondensibles (also called LVHC) gases from digesters and multiple-effect evaporators shall be treated to reduce the emission of TRS equal to the reduction achieved by thermal oxidation in a lime kiln. Compliance with this requirement shall be achieved by not later than July, 1972.

[PTC No. P-060209, 5/25/07, State Only]

13.6 IDAPA58.01.01.824 -Monitoring and Reporting

05 Semi-Annual Reporting Requirements

Unless otherwise authorized by the Department, excess emissions data for emissions units covered by IDAPA58.01.01.820 shall be reported by each mill at the end of each semi-annual calendar period, as follows:

a. Excess emissions for the semi-annual report required by IDAPA 58.01.01.824.05 shall be defined as periods during which noncondensibles are not treated as required by IDAPA58.01.01.820. Periods of excess emissions reported under IDAPA 58.01.01.824.05 shall not be a violation under IDAPA 58.01.01.820 provided that the time of excess emissions (excluding periods of startup, shutdown, or malfunction) divided by the total process operating time in a semi-annual period does not exceed one percent (1%).

b. The total duration of excess emissions during the reporting period (recorded in hours).

c. The total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and

d. A breakdown of the total duration of excess emissions during the reporting period into those that are due to startup/shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

[PTC No. P-060209, 5/25/07, IDAPA58.01.01.824]

Emissions Limits

13.7 SO_2 Emissions Limits –to avoid significant modification to a major source (PSD, or 40 CFR 52.21)

- The SO_2 emissions from the stack of the packed bed scrubber (also called incinerator stack) shall not exceed 4.70 lb/hr, based on a three-hour average.
- The SO_2, emissions from the stack of the packed bed scrubber (also called incinerator stack) shall not exceed 20 T/yr, based on a 12-month rolling average.

[PTC No. P-060209, 5/25/07]

Operating Requirements

13.8 SO_2 Packed Bed Scrubber Operation

The packed bed scrubber shall be installed, operated and maintained according to the requirements of CAM included in Section 19 of this permit.

[40 CFR 64]

13.9 Periodic performance testing for SO_2 emissions from the non-condensable incinerator stack shall be accomplished by the permittee as follows. A test shall be conducted prior to September 2012 to demonstrate compliance with Permit Condition 13.7. If the SO_2 measured during the test is less than or equal to 50% of any respective SO_2 standard listed in Permit Condition 13.7, then the permittee shall conduct periodic performance tests every five years from the most recent test date. If the SO_2 measured in the most recent performance test is between 50% and 80% of any respective SO_2 standard listed in Permit Condition 13.7, then the permittee shall conduct periodic performance tests every three years from the most recent test date. If the initial test exceeds 80% of the standard, an annual test shall be required. All testing shall be in accordance with Facility-Wide Permit Condition 1.10. During the tests scrubber liquid pH and scrubber liquid flow shall monitored and recorded so that data is available to assess compliance with Permit Condition 19.9. The CAM indicators monitored during the test shall be reported with the test results.

[IDAPA 58.01.01.322.09]

14. OXYGEN DELIGNIFICATION REACTOR

Table 14.1 describes the devices used to control emissions from the oxygen delignification reactor.

TABLE 14.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emission Units	Emission Control Device
766	Oxygen delignification reactor	None

Table 14.2 contains a summary of the requirements that apply to this source. Specific requirements are listed below Table 14.2.

TABLE 13.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
14.1	CO	74.5 T/yr	PTC No. 2007.0056	14.2 - 14.4

Emission Limits

14.1 Carbon monoxide (CO) emissions from the oxygen delignification system stack shall not exceed 74.5 tons per any consecutive 12-month period as determined by multiplying the emission factor required to be developed by this permit by the throughput of air dried pulp each consecutive 12-month period.

[PTC No. 2007.0056, 8/17/07]

Monitoring Requirements

14.2 **Performance Test**

Once each five years the permittee shall conduct a carbon monoxide performance test on the oxygen delignification system. The performance test shall be conducted in accordance with the Test Methods and Procedures specified by IDAPA 58.01.01.157. The test shall be conducted under worst case normal operating conditions and the following shall be recorded during the source test:

- Oxygen rate to the system.
- Lignin content (i.e. Kappa number) of the pulp before and after the system.
- The throughput of air dried pulp during the test.

The performance test report shall include development of an emission factor in units of pounds of carbon monoxide emitted per air dried ton of pulp processed (lb/ADT).

[PTC No. 2007.0056, 8/17/07]

14.3 **Throughput Monitoring**

The permittee shall monitor and record the tons of air dried pulp processed through the oxygen delignification system each month and each consecutive 12-month period.

[PTC No. 2007.0056, 8/17/07]

14.4 **Emissions Calculations**

Each month, after the initial carbon monoxide performance test is completed on the oxygen delignification system, the permittee shall calculate the carbon monoxide emissions by multiplying the carbon monoxide emission factor by the tons of air dried pulp processed over the most recent consecutive 12-month period. The permittee shall maintain emissions records on-site in units of tons of carbon monoxide emitted each consecutive 12-month period. The records shall be made available to DEQ representatives upon request.

[PTC No. 2007.0056, 8/17/07]

15. CHLORINE DIOXIDE PLANT (STATE-ONLY)

Table 15.1 describes the devices used to control emissions from the Chlorine Dioxide Plant.

TABLE 15.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point ID	Emission Units	Emission Control Device
69 and 67	Lurgi 134 and 234 HCl synthesis	Lurgi scrubber or Fiberline bleach plant scrubber

Table 15.2 contains a summary of the requirements that apply to these sources. Specific requirements are listed below Table 15.2.

TABLE 15.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
15.1	Cl_2, ClO_2 and HCl limts	pound-per-hour and ton-per- year limits	PTC No. 069-00001	15.2 - 15.7

Emission Limits

15.1 The HCl, ClO_2, and Cl_2 emissions shall not exceed the following emission rates.

Source Description	Cl_2		ClO_2		HCl	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
134 HCl synthesis	0.16	0.7	0.16	0.7	0.53	2.3
234 HCl synthesis	0.16	0.7	0.16	0.7	0.53	2.3
Lurgi Cl_2 scrubber	0.26	1.1	0.26	1.1	0.15	0.7

[PTC No. 069-00001, 9/22/99 and amended 2/17/00- State Only]

Operating Requirements

15.2 The Lurgi scrubber shall operate a minimum of 95% of the Lurgi operating time.

[PTC No. 069-00001, 9/22/99-State Only]

15.3 The auxiliary scrubber shall operate continuously while the Lurgi scrubber is undergoing maintenance or when needed in emergency situation.

[PTC No. 069-00001, 9/22/99-State Only]

15.4 The make-up scrubbing-media flow rate to the auxiliary scrubber shall be a minimum of 50 gpm at any time the Fiberline bleach plant is operating and the scrubber is being used as an auxiliary scrubber for the Lurgi plant.

[PTC No. 069-00001, 9/22/99-State Only]

15.5 The permittee shall not conduct a planned shut-down of either synthesis unit while the auxiliary scrubbing system is operating.

[PTC No. 069-00001, 9/22/99-State Only]

Monitoring Requirements

15.6 The permittee shall monitor and record the information listed below on a daily basis; all records shall be kept onsite for the most recent five-year period and shall be made available to DEQ representatives upon request.

15.6.1 Which scrubber is operating (Lurgi scrubber or auxiliary scrubber)

15.6.2 The auxiliary scrubber media flow rate while the auxiliary scrubber is operating in place of the Lurgi scrubber.

[PTC No. 069-00001, 9/22/99-State Only]

15.7 Within 60 days of issuance of this permit, the permittee shall have developed an O&M manual for the air pollution control equipment that incorporates manufacturer operating specifications and recommendations. The manual shall be updated as necessary and shall include, at a minimum, the following:

- Normal operating conditions, parameters, and procedures
- Startup, shutdown and malfunction procedures
- Guidelines for normal maintenance schedules and procedures

The O&M manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

[IDAPA 58.01.01.322.06; [PTC No. 069-00001, 9/22/99-State Only]

16. MISCELLANEOUS PROCESS SOURCES

Table 16.1 below describes the devices used to control emissions from miscellaneous sources.

TABLE 16.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emission Point Identification	Emission Unit(s)/Process(es)	Emission Control Device
774, 775	Sawdust transfer cyclones	None
PM	No. 1 and No. 2 paper machines	None
513, 514	Pulp dryer	None
464, 465, 466	Dry additives handling	Baghouses (3)
432	Dry fuel bins	Baghouse

Table 16.2 contains a partial summary of requirements that apply generally to these sources.

TABLE 16.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Source ID	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
16.1	774, 775, 513, 514	PM	Process weight	IDAPA 58.01.01.702	16.4
16.2	464, 465, 466, 432	PM	Process weight	IDAPA 58.01.01.701	16.4

Emission Limits

16.1 No person shall discharge to the atmosphere from any source operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

This is applicable to source ID numbers 774, 775, PM, 513, and 514.

[IDAPA 58.01.01.702, 4/5/00]

16.2 No person shall discharge any air pollutant to the atmosphere from any source operating on or after October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

a. If PW is less than 9,250 lb/hr,

$$E = 0.045(PW)^{0.60}$$

b. If PW is equal to or greater than 9,250 lb/hr,

$$E = 1.10(PW)^{0.25}$$

This is applicable to source ID numbers 464, 465, 466, and 432.

[IDAPA 58.01.01.701, 4/5/00]

17. PULP AND PAPER MACT - 40 CFR 63 SUBPART S

Summary Description

Hazardous air pollutant emissions from the kraft pulping systems and pulp bleaching systems are regulated by the pulp and paper MACT (40 CFR 63.440). The pulping standards include requirements for collecting and treating pulping process gases and pulping condensate waste streams. Pulping gases are required to be treated to a standard depending on whether the gases are generated from process that produce pollutants in low volume high concentrations (LVHC) or whether they are in high volume low concentrations (HVLC).

Emissions from the bleaching process are required to be collected and treated to reduce chlorinated HAP emissions.

The purpose of this section of the permit is to incorporate and summarize the applicable requirements of 40 CFR 63 Subpart S. Should there be a conflict between 40 CFR 63 and any of the permit conditions in Section 17 of this permit then 40 CFR 63 shall govern including any applicable amendments to that regulation.

Table 17.1, Table 17.2, Table 17.3, and 17.4 contain summaries of the requirements that apply to the LVHC systems, HVLC systems, bleaching systems, and the pulping process condensates respectively.

Table 17.1 - 40 CFR 63 Subpart S –SUMMARY OF APPLICABLE REQUIREMENTS FOR LVHC SYSTEMS

Process Systems	Standards[a]	Control Devices	Monitoring
Digesters Turpentine Recovery Evaporators	1) Reduce HAP emissions by 98% by weight; or 2) Reduce HAP in a thermal oxidizer to 20 ppm by weight @ 10% O_2; or 3) Combust HAPs at 1,600 ° F for 0.75 sec.; or 5) Reduce HAPs by combusting in a boiler, lime kiln, or recovery furnace by introducing the HAP stream with the primary fuel; or 6) Introduce HAPs to a 150MMBtu or greater boiler or recovery furnace with combustion air	Thermal Oxidizer (NCG incinerator); or Lime Kiln	Thermal Oxidizer – continuous monitoring and recording of temperature immediately downstream from the firebox. Lime Kiln – no monitoring required.

a) Clearwater may choose to comply with any of the six standards listed in the table. At the time of permit issuance Clearwater indicated that their choice of standard was option 2 and option 5

Table 17.2 - 40 CFR 63 Subpart S –SUMMARY OF APPLICABLE REQUIREMENTS FOR HVLC SYSTEMS

HVLC System	Standards	Control Device	Monitoring
Oxygen Press North	1) Reduce HAP emissions by 98% by weight; or 2) Reduce HAP in a thermal oxidizer to 20 ppm by weight @ 10% O_2; or 3) Combust HAPs at 1,600 ° F for 0.75 sec.; or 5) Reduce HAPs by combusting in a boiler, lime kiln, or recovery furnace by introducing the HAP stream with the primary fuel; or 6) Introduce HAPs to a 150MMBtu or greater boiler or recovery furnace with combustion air (at the time of submittal of the Tier I permit renewal application Clearwater indicated that they were electing to comply with number 5 listed above; and number 2 as a backup)	Thermal Oxidizer (NCG incinerator); or Lime Kiln	Thermal Oxidizer – continuous monitoring and recording of temperature immediately downstream from the firebox. Lime Kiln – no monitoring required.
Oxygen Press South			
Pressate Receiver South			
Pressate Storage Tank			
No. 1 Post Oxygen Wash Press			
No. 1 Post Oxygen Press Dilution Conveyor			
No. 1 Post Oxygen Press Level Tank			
No. 2 Post Oxygen Washer Press Feed Tank			
No. 2 Pre Oxygen Washer Feed Tank (CL[1])			
No. 1 Pre Oxygen Washer (CL)			
No. 1 Pre Oxygen Washer Filtrate Tank (CL)			
No. 1 Pre Oxygen Washer (CL)			
No. 2 Pre Oxygen Washer (CL)			
No. 2 Pre Oxygen Washer Filtrate Tank (CL)			
Brownstock Washers Hood (SL[2])			
No. 1 Filtrate Tank (SL)			
No. 2 Filtrate Tank (SL)			
No. 3 Filtrate Tank (SL)			
No. 4 Filtrate Tank (SL)			
Soap Tank (SL)			
Foam Tank (SL)			
No. 1 Post Oxygen Wash Press (CL[1])			
No. 1 Post Oxygen Wash Press Dilution Conveyor (CL)			
No. 1 Post Oxygen Wash Press Level Tank (CL)			
No. 2 Post Oxygen Washer Press Feed Tank (CL)			
Oxygen Delignification Blow Tank	Clean Condensate Alternative Emission Limit – 519 pounds per day of methanol as an annual average from the aerated storage basin and O_2 blow tank combined	Wet Scrubber	Scrubber water temperature; and Scrubbing water flow
No. 2 Post Oxygen Wash Press	Emissions are offset from reductions at other sources as part of the Clean Condensate Alternative	None	None
No. 2 Post Oxygen Wash Press Dilution Conveyor			
No. 2 Post Oxygen Wash Press Level Tank			
No. 3 Post Oxygen Wash Press			
No. 2 Post Oxygen Wash Press (CL)			
No. 2 Post Oxygen wash Press Dilution conveyor (CL)			
No. 2 Post Oxygen Wash Press Level Tank (CL)			
No. 3 Post Oxygen Wash Press (CL)			
Oxygen Delignification Reactor Vent			

Table 17.3 - 40 CFR 63 Subpart S –SUMMARY OF APPLICABLE REQUIREMENTS FOR BLEACHING SYSTEMS

Bleaching Systems	Standards	Control Device	Monitoring
Chip Line Systems: D-1 stage tower, washer hood, north and south filter tanks; and D-2 stage tower, washer hood, and filtrate tank	Use a control device to reduce chlorinated HAP emissions (excluding chloroform) to: 1) Reduce total chlorinated HAP mass by 99%; or 2) Achieve emissions of 10 ppm chlorinated HAP; or 3) Achieve chlorinated HAP emissions of 0.002 pounds per of oven dried ton of pulp At the time of permit renewal Clearwater indicated they would comply with number 2 above)	Chip line bleach plant scrubber	Continuous monitoring system (CMS) for determining scrubbing media pH, scrubbing media flow rate, and fan status (amperage?).
Sawdust Line Systems: D-1 stage tower, washer hood, and filtrate tank; and D-2 stage tower, washer hood, and filtrate tank.		Sawdust line bleach plant scrubber.	

Table 17.4 - 40 CFR 63 Subpart S –SUMMARY OF APPLICABLE REQUIREMENTS FOR PULPING CONDENSATES

Affected Process Systems	Standards	Control Device	Monitoring
Condensates from: 1. Digester systems 2. Turpentine recovery systems 3. Condensate from each evaporator system each stage where weak liquor is introduced; and each evaporator vacuum system for each stage where weak liquor is introduced. 4. Each HVLC system 5. Each LVHC system; or Condensates from 4 and 5 listed above plus other condensate streams that contain 65% of the HAPs that are contained in 1, 2 and 3 above; or Collect condensate streams from 1 through 5 listed above such that the total collected is 11.1 lb/TODP	Condensates shall be collected and conveyed in a closed collection system which meets the requirements of §§63.446(d) 1) Condensates shall be recycled to systems meeting the requirements for pulping system gas collection and treatment requirements of §§ 63.443; or 2) Discharge condensate below the liquid surface of a biological treatment system treating the condensates to: (a) Reduce or destroy 92% or more of the total HAPs ; or (b) Treat condensates to remove 10.2 lb/TODP or more of total HAPs, or achieve a total HAP concentration of 330 ppm or less by weight at the outlet of the control device. (at the time of submittal of the Tier I permit renewal application Clearwater indicated that they were electing to comply with 2(b) above)	Aerated Storage Basin	Daily monitoring of influent soluble COD loading or concentration, and total aerator horsepower. Quarterly testing within 45 days after the beginning of each quarter.

Standards for the Pulping System Processes - 40 CFR 63.443

17.1 The owner or operator of each pulping system using the kraft process subject to the requirements of this subpart shall control the total HAP emissions, from the following listed equipment systems, as specified in Permit Conditions 17.2 and 17.3 respectively.

- LVHC Systems – systems subject to this subpart are listed in Table 17.1
- HVLC Systems - systems subject to this subpart are listed in Table 17.2

[40 CFR 63.443(a)]

17.2 Equipment systems listed in Table 17.1 and 17.2 of this permit shall be enclosed and vented into a closed-vent system and routed to a control device that meets the requirements specified in paragraph specified in Section 17.3 of this permit. The enclosures and closed-vent system shall meet the requirements specified in §63.450 (also specified in Permit Condition 17.17).

[40 CFR 63.443(c)]

17.3 The control device used to reduce total HAP emissions from each equipment system listed in Table 17.1 and 17.2 of this permit shall:

(1) Reduce total HAP emissions by 98 percent or more by weight; or

(2) Reduce the total HAP concentration at the outlet of the thermal oxidizer to 20 parts per million or less by volume, corrected to 10 percent oxygen on a dry basis; or

(3) Reduce total HAP emissions using a thermal oxidizer designed and operated at a minimum temperature of 871 °C (1600 °F) and a minimum residence time of 0.75 seconds; or

(4) Reduce total HAP emissions using one of the following:

(i) A boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone; or

(ii) A boiler or recovery furnace with a heat input capacity greater than or equal to 44 megawatts (150 million British thermal units per hour) by introducing the HAP emission stream with the combustion air.

[40 CFR 63.443(d)]

17.4 Periods of excess emissions reported under §63.455 shall not be a violation of Permit Conditions 17.2 and 17.3 respectively provided that the time of excess emissions (excluding periods of startup, shutdown, or malfunction) divided by the total process operating time in a semi-annual reporting period does not exceed the following levels:

(1) One percent for control devices used to reduce the total HAP emissions from the LVHC system; and

(2) Four percent for control devices used to reduce the total HAP emissions from the HVLC system; and

(3) Four percent for control devices used to reduce the total HAP emissions from both the LVHC and HVLC systems.

[40 CFR 63.443(e)]

Clean Condensate Alternative - 40 CFR 63.447

17.5 In accordance with 40 CFR 63.477, as an alternative to the requirements specified in Permit Conditions 17.2 and 17.3 for the control of HAP emissions from all named HVLC pulping systems listed in Table 17.2 of this permit, the permittee has chosen to achieve emissions reductions equivalent to what would been achieved by complying with Permit Condition 17.2 and 17.3 for all of the named HVLC systems. Equivalent emissions reductions are achieved by treating a portion of the listed HVLC gas streams in Table 17.2 and by treating process condensates in the aerated storage basin beyond what would have otherwise been required. All of the LVHC systems listed in Table 7.1 shall meet the requirements of Permit Conditions 17.2 and 17.3. The clean condensate alternative is only an option for HVLC systems.

[40 CFR 63.447]

17.6 Table 17.5 lists the systems that shall be treated under the clean condensate alternative. Also listed are the corresponding applicable emissions standards that in combination are equivalent to emissions reductions that would have been achieved by complying with Permit Condition 17.2 and 17.3.

[40 CFR 63.447]

Table 17.5 – Clean Condensate Alternative

System	Control Device	Emissions Standard
Oxygen Press North Oxygen Press South Pressate Receiver South Pressate Storage Tank No. 1 Post Oxygen Wash Press No. 1 Post Oxygen Press Dilution Conveyor No. 1 Post Oxygen Press Level Tank No. 2 Post Oxygen Washer Press Feed Tank No. 2 Pre Oxygen Washer Feed Tank (CL[1]) No. 1 Pre Oxygen Washer (CL) No. 1 Pre Oxygen Washer Filtrate Tank (CL) No. 1 Pre Oxygen Washer (CL) No. 2 Pre Oxygen Washer (CL) No. 2 Pre Oxygen Washer Filtrate Tank (CL) Brownstock Washers Hood (SL[2]) No. 1 Filtrate Tank (SL) No. 2 Filtrate Tank (SL) No. 3 Filtrate Tank (SL) No. 4 Filtrate Tank (SL) Soap Tank (SL) Foam Tank (SL) No. 1 Post Oxygen Wash Press (CL[1]) No. 1 Post Oxygen Wash Press Dilution Conveyor (CL) No. 1 Post Oxygen Wash Press Level Tank (CL) No. 2 Post Oxygen Washer Press Feed Tank (CL)	NCG incinerator or one of two lime kilns	Shall comply with Permit Condition 17.3 (1), (2), 3), or (4): Reduce total HAPs by 98% by weight, or Thermally oxidize HAPs to 20 ppm @10% O_2, or Thermally oxidize HAPs 1600 F for 0.75 seconds, or Introduce the HAP stream with the primary fuel into the flame zone of a boiler, lime kiln, or recovery furnace; or introduce the HAP stream with the combustion air in a boiler or recovery furnace with a rated heat input capacity of 150 MMBtu/hr or greater.
Additional Clean Condensate Alternative Emission Limits		
Oxygen Delignification Blow Tank	Wet Scrubber	519 pounds per day of methanol as an annual average. (limit for ASB + O_2 Blow Tank)
Aerated Storage Basin (ASB)	Aerators	

1) CL = Chip Line; 2) SL = Sawdust Line

17.6.1 In lieu collecting and treating all of the HVLC systems listed in Table 17.2 a portion of those systems are treated. The portion of the HVLC gases that shall be collected and treated are listed in Table 17.5. The HVLC systems listed in Table 17.5 shall be enclosed and vented into a closed-vent system and routed to a control device that meets the requirements specified in Section 17.3 (1), (2), (3), and (4) of this permit. The enclosures and closed-vent system shall meet the requirements specified in §63.450 (also specified in Permit Condition 17.17).

[40 CFR 63.447]

17.6.2 Methanol emissions from the oxygen delignification blow tank stack, and emissions from the aerated storage basin combined shall not exceed 519 pounds per day as an annual average. Annual average emissions are determined by averaging the daily emissions from the most recent 365 days.

[40 CFR 63.447]

Standards for the Bleaching System - 40 CFR 63.445

17.7 Owners or operators of bleaching systems from kraft pulping processes that use any chlorinated compounds shall meet all the provisions of this section.

[40 CFR 63.445(a)]

Bleaching system means all process equipment after high-density pulp storage prior to the first application of oxidizing chemicals or reducing chemicals following the pulping system, up to and including the final bleaching stage. Bleaching systems are listed in Table 17.3 of this permit.

[40 CFR 63.441]

17.8 The equipment at each bleaching stage, of the bleaching systems listed in paragraph listed Table 17.3 of this permit where chlorinated compounds are introduced shall be enclosed and vented into a closed-vent system and routed to a control device that meets the requirements specified in Permit Condition 17.9. The enclosures and closed-vent system shall meet the requirements specified in §63.450 (also specified in Permit Condition 17.17). If process modifications are used to achieve compliance with the emission limits specified in Permit Condition 17.9(2) or 17.9(3), enclosures and closed-vent systems are not required, unless appropriate.

[40 CFR 63.445(b)]

17.9 The control device used to reduce chlorinated HAP emissions (not including chloroform) from the equipment listed in Table17.3 of this permit shall:

(1) Reduce the total chlorinated HAP mass in the vent stream entering the control device by 99 percent or more by weight; or

(2) Achieve a treatment device outlet concentration of 10 parts per million or less by volume of total chlorinated HAP; or

(3) Achieve a treatment device outlet mass emission rate of 0.001 kg of total chlorinated HAP mass per megagram (0.002 pounds per ton) of ODP.

[40 CFR 63.445(c)]

17.10 The owner or operator of each bleaching system subject to Permit Condition 17.9(2) shall comply with the following applicable effluent limitation guidelines and standards specified in 40 CFR part 430:

(i) Dissolving-grade kraft bleaching systems and lines, 40 CFR 430.14 through 430.17; or

(ii) Paper-grade kraft and soda bleaching systems and lines, 40 CFR 430.24(a)(1) and (e), and 40 CFR 430.26 (a) and (c).

[40 CFR 63.445(d)]

Standards for Kraft Pulping Process Condensates - 40 CFR 63.446

17.11 Pulping process condensates from the following equipment shall be treated to meet the standards in Permit Condition 17.14:

1) Each digester system;

2) Each turpentine recovery system;

3) Each evaporator system condensate from:

(i) The vapors from each stage where weak liquor is introduced (feed stages); and

(ii) Each evaporator vacuum system for each stage where weak liquor is introduced (feed stages).

4) Each HVLC collection system; and

5) Each LVHC collection system.

[40 CFR 63.446(a)&(b)]

17.12 One of the following combinations of HAP-containing pulping process condensates generated, produced, or associated with the equipment systems listed Permit Condition 17.11 shall be subject to the requirements Permit Condition 17.13:

Combination #1:

1) Digester systems
2) Turpentine recovery systems
3) Condensate from each evaporator system each stage where weak liquor is introduced; and each evaporator vacuum system for each stage where weak liquor is introduced.
4) Each HVLC system
5) Each LVHC system; or

Combination #2:

- Condensates from 4 and 5 listed above plus other condensate streams that contain 65% of the HAPs that are contained in 1, 2 and 3 above; or

- Collect condensate streams from 1 through 5 listed above such that the total collected is 11.1 lb/TODP; or

Combination #3:

The pulping process condensates from equipment systems listed in paragraphs 1) through 5) above that in total contain a total HAP mass of 3.6 kilograms or more of total HAP per megagram (7.2 pounds per ton) of ODP for mills that do not perform bleaching or 5.5 kilograms or more of total HAP per megagram (11.1 pounds per ton) of ODP for mills that perform bleaching.

[40 CFR 63.446(c)]

17.13 The pulping process condensates from the equipment systems listed in Permit Condition 17.12 shall be conveyed in a closed collection system that is designed and operated to meet the following requirements:

- Each closed collection system shall meet the individual drain system requirements specified in §§63.960, 63.961, and 63.962 of subpart RR of this part, except for closed vent systems and control devices shall be designed and operated in accordance with Permit Condition 17.3 and §63.450, instead of in accordance with §63.693 as specified in §63.962 (a)(3)(ii), (b)(3)(ii)(A), and (b)(5)(iii); and

[40 CFR 63.446(d)(1)]

- If a condensate tank is used in the closed collection system, the tank shall meet the following requirements:

  The fixed roof and all openings (e.g., access hatches, sampling ports, gauge wells) shall be designed and operated with no detectable leaks as indicated by an instrument reading of less than 500 parts per million above background, and vented into a closed-vent system that meets the requirements in §63.450 and routed to a control device that meets the requirements in Permit Condition 17.3); and

  (Each opening shall be maintained in a closed, sealed position (e.g., covered by a lid that is gasketed and latched) at all times that the tank contains pulping process condensates or any HAP removed from a pulping process condensate stream except when it is necessary to use the opening for sampling, removal, or for equipment inspection, maintenance, or repair.

[40 CFR 63.446(d)(2)]

17.14 Each pulping process condensate from the equipment systems listed in Permit Condition 17.12 of this section shall be treated according to one of the following options:

(1) Recycle the pulping process condensate to an equipment system specified in Table 17.1 or Table 17.2 meeting the requirements specified in Permit Conditions 17.2 and 17.3; or

(2) Discharge the pulping process condensate below the liquid surface of a biological treatment system and treat the pulping process condensates to meet the following requirements (total HAP shall be measured as specified in §63.457(g)):

- Treat the pulping process condensates to reduce or destroy the total HAPs by at least 92 percent or more by weight; or

- At mills that do not perform bleaching, treat the pulping process condensates to remove 3.3 kilograms or more of total HAP per megagram (6.6 pounds per ton) of ODP, or achieve a total HAP concentration of 210 parts per million or less by weight at the outlet of the control device; or

- At mills that perform bleaching, treat the pulping process condensates to remove 5.1 kilograms or more of total HAP per megagram (10.2 pounds per ton) of ODP, or achieve a total HAP concentration of 330 parts per million or less by weight at the outlet of the control device.

[40 CFR 63.446(e)]

17.15 Each HAP removed from a pulping process condensate stream during treatment and handling under Permit Conditions 17.13 or 17.14, except for those treated in a biological treatment system, shall be controlled as specified in Permit Conditions 17.2 and 17.3.

[40 CFR 63.446(f)]

17.16 For the purposes of meeting the requirements in Permit Condition 17.12 or Permit Condition 17.14 of this section at mills producing both bleached and unbleached pulp products, owners and operators may meet a prorated mass standard that is calculated by prorating the applicable mass standards (kilograms of total HAP per megagram of ODP) for bleached and unbleached mills specified in Permit Condition 17.12 or Permit Condition 17.14 by the ratio of annual megagrams of bleached and unbleached ODP.

[40 CFR 63.446(i)]

Standards for Enclosures and Closed-vent Systems – 40 CFR 63.450

17.17 Each enclosure and closed-vent system specified in Permit Condition 17.2, and Permit Condition 17.8 for capturing and transporting vent streams that contain HAP shall meet the following requirements:

- Each enclosure shall maintain negative pressure at each enclosure or hood opening as demonstrated by the procedures specified in §63.457(e). Each enclosure or hood opening closed during the initial performance test specified in §63.457(a) shall be maintained in the same closed and sealed position as during the performance test at all times except when necessary to use the opening for sampling, inspection, maintenance, or repairs.

- Each component of the closed-vent system used to comply with §§63.443(c), 63.444(b), and 63.445(b) that is operated at positive pressure and located prior to a control device shall be designed for and operated with no detectable leaks as indicated by an instrument reading of less than 500 parts per million by volume above background, as measured by the procedures specified in §63.457(d).

- Each bypass line in the closed-vent system that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations for the pulping system process and for the bleaching system shall comply with either of the following requirements:

  (1) On each bypass line, the owner or operator shall install, calibrate, maintain, and operate according to the manufacturer's specifications a flow indicator that is capable of taking periodic readings as frequently as specified in §63.454(e). The flow indicator shall be installed in the bypass line in such a way as to indicate flow in the bypass line; or

  (2) For bypass line valves that are not computer controlled, the owner or operator shall maintain the bypass line valve in the closed position with a car seal or a seal placed on the valve or closure mechanism in such a way that valve or closure mechanism cannot be opened without breaking the seal.

[40 CFR 63.450]

Monitoring Requirements – 40 CFR 63.453

17.18 Each owner or operator subject to the standards specified in Permit Conditions 17.2, 17.3, 17.6, 17.8, 17.9, 17.11, 17.12 and for each bypass line on a closed vent system affected by Permit Condition 17.17, shall install, calibrate, certify, operate, and maintain according to the manufacturer's specifications, the following continuous monitoring system(CMS, as defined in §63.2 of this part), including a continuous recorder as specified in paragraphs (b) through (m) of this section, except as allowed in paragraph (m) of this section. The CMS shall include a continuous recorder.

Thermal Oxidizer Monitoring

17.19 A CMS shall be operated to measure the temperature in the firebox or in the ductwork immediately downstream of the firebox and before any substantial heat exchange occurs for each thermal oxidizer used to comply with the requirements of Permit Condition 17.3. Owners and operators complying with the HAP concentration requirements in Permit Condition 17.3(c) may install a CMS to monitor the thermal oxidizer outlet total HAP or methanol concentration, as an alternative to monitoring thermal oxidizer operating temperature.

[40 CFR 63.453(b)]

Bleaching System Scrubber Monitoring

17.20 A CMS shall be operated to measure the following parameters for each gas scrubber used to comply with the bleaching system requirements of Permit Condition 17.9.

(1) The pH or the oxidation/reduction potential of the gas scrubber effluent;

(2) Scrubber Fan motor amperage (September 27, 2001 EPA approved alternative to flow rate); and

(3) The gas scrubber liquid influent flow rate.

As an option to the requirements specified in this section, a CMS shall be operated to measure the chlorine outlet concentration of each gas scrubber used to comply with the bleaching system outlet concentration requirement specified in Permit Condition 17.9(2).

[40 CFR 63.453(c)]

Open Biological System Monitoring

17.21 As an alternative to complying with the daily open biological system monitoring requirements specified by 40 CFR 63.453(j)(1) the following daily monitoring shall be required:

- The ratio of influent soluble COD loading to total aerator horsepower; and
- In the event that influent flow cannot be determined by the mill's monitoring system, the ratio of the influent soluble COD concentration to total aerator horsepower shall be monitored.

[40 CFR 63.453(n), EPA approved alternative on 9/5/02]

17.22 The Permittee shall conduct a performance test as specified in §63.457(l) within 45 days after the beginning of each quarter and meet the applicable emission limit in Permit Condition 17.14.

The performance test conducted in the first quarter (annually) shall be performed for total HAP as specified in §63.457(g) and meet the percent reduction or mass removal emission limit specified in Permit Condition 17.14.

The remaining quarterly performance tests shall be performed as specified above except owners or operators may use the applicable methanol procedure in §63.457(l)(1) or (2) and the value of r determined during the first quarter test instead of measuring the additional HAP to determine a new value of r.

[40 CFR 63.453(j)(3)]

Enclosure and Closed Vent Systems

17.23 Each enclosure and closed-vent system used to comply with Permit Condition 17.17 shall comply with the requirements specified below

(1) For each enclosure opening, a visual inspection of the closure mechanism specified in §63.450(b) shall be performed at least once every 30 days to ensure the opening is maintained in the closed position and sealed.

(2) Each closed-vent system required by §63.450(a) shall be visually inspected every 30 days and at other times as requested by the Administrator. The visual inspection shall include inspection of ductwork, piping, enclosures, and connections to covers for visible evidence of defects.

(3) For positive pressure closed-vent systems or portions of closed-vent systems, demonstrate no detectable leaks as specified in §63.450(c) measured initially and annually by the procedures in §63.457(d).

(4) Demonstrate initially and annually that each enclosure opening is maintained at negative pressure as specified in §63.457(e).

(5) The valve or closure mechanism specified in §63.450(d)(2) shall be inspected at least once every 30 days to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.

(6) If an inspection required by paragraphs above identifies visible defects in ductwork, piping, enclosures or connections to covers required by §63.450, or if an instrument reading of 500 parts per million by volume or greater above background is measured, or if enclosure openings are not maintained at negative pressure, then the following corrective actions shall be taken as soon as practicable.

- A first effort to repair or correct the closed-vent system shall be made as soon as practicable but no later than 5 calendar days after the problem is identified.
- The repair or corrective action shall be completed no later than 15 calendar days after the problem is identified. Delay of repair or corrective action is allowed if the repair or corrective action is technically infeasible without a process unit shutdown or if the owner or operator determines that the emissions resulting from immediate repair would be greater than the emissions likely to result from delay of repair. Repair of such equipment shall be completed by the end of the next process unit shutdown.

[40 CFR 63.453(k)]

Oxygen Delignification Blow Tank Scrubber, etc.

17.24 Each owner or operator using a control device, technique or an alternative parameter other than those specified above shall install a CMS and establish appropriate operating parameters to be monitored that demonstrate, to the Administrator's satisfaction, continuous compliance with the applicable control requirements.

[40 CFR 63.453(m)]

Establishing Operating Parameters

17.25 To establish or reestablish the value for each operating parameter required to be monitored under Permit Conditions 17.19, 17.20 and 17.21 or to establish appropriate parameters for Permit Condition 17.24, each owner or operator shall use the following procedures:

(1) During the initial performance test required in §63.457(a) or any subsequent performance test, continuously record the operating parameter;

(2) Determinations shall be based on the control performance and parameter data monitored during the performance test, supplemented if necessary by engineering assessments and the manufacturer's recommendations;

(3) The owner or operator shall provide for the DEQ's approval the rationale for selecting the monitoring parameters necessary to comply; and

(4) Provide for the Administrator's approval the rationale for the selected operating parameter value, and monitoring frequency, and averaging time. Include all data and calculations used to develop the value and a description of why the value, monitoring frequency, and averaging time demonstrate continuous compliance with the applicable emission standard.

[40 CFR 63.453(n)]

Maintain Copy of All DEQ approved Parameters and Averaging Periods

17.26 The permittee shall maintain a copy of all DEQ approvals obtained pursuant to Permit Condition 17.25. The copies shall be made available to DEQ representatives upon request. Operating parameters which have been approved at the time of permit issuance are listed in Table 17.6.

Table 17.6 Continuous Monitoring System Parameters and Parameter Limits

System	Parameter(s)	Parameter limit
Thermal Oxidizer	Temperature	1,324 F, 3-hr block average
Chip Bleach System Scrubber	Upper stage Flow rate	175 gpm, 3-hr block average
	lower stage flow rate	303 gpm, 3-hr block average
	pH	10.6, 3-hr block average
	Fan Load	>25%
Sawdust Bleach Sys. Scrubber	Flow rate	289 gpm, 3-hr block average
	pH	11.1, 3-hr block average
	Fan Load	> 25%
Open Biological System	Soluble COD loading/total aerator horse power; or Soluble COD concentration/aerator horsepower	159.2 lb-SCODi1/day-HP2; or 0.536 mg-SCODi/liter –HP2[1]
O_2 Delignification Scrubber	Fluid Temperature	<= 82 F, 3-hr block average
	Flow rate	60 gpm, 3-hr block average
	Fan Load	> 25 amps

[IDAPA 58.01.01.322.14]

[1] EPA approval letter from Jeff KenKnight, Federal and Delegated Air Programs Unit, to Frank Radle, Potlatch, September 5, 2002.

Excess Emissions

17.27 Each owner or operator of a control device subject to the monitoring provisions of this section shall operate the control device in a manner consistent with the minimum or maximum (as appropriate) operating parameter value or procedure required to be monitored under Permit Conditions 17.19, 17.20, 17.21 and 17.24 established under this subpart. Except as provided in paragraph Permit Condition 17.4, or Permit Condition 17.28, operation of the control device below minimum operating parameter values or above maximum operating parameter values established under this subpart or failure to perform procedures required by this subpart shall constitute a violation of the applicable emission standard of this subpart and be reported as a period of excess emissions.

[40 CFR 63.453(o)]

17.28 The procedures of 40 CFR 63.453(p) apply to each owner or operator of an open biological treatment system complying with daily monitoring requirements of permit Condition 17.21 whenever a monitoring parameter excursion occurs, and the owner or operator chooses to conduct a performance test to demonstrate compliance with the applicable emission limit. A monitoring parameter excursion occurs whenever the monitoring parameters specified in Permit Condition 17.21 are below minimum operating parameter values or above maximum operating parameter values established by Permit Condition 17.25. Refer to 40 CFR 453(p) for the specific sampling, performance testing, recordkeeping and reporting requirements.

[40 CFR 63.453(p)]

Record Keeping Requirements – 40 CFR 63.454

17.29 The owner or operator of each affected source subject to the requirements of this subpart, as shown in Table 17.6 of this permit, shall comply with the recordkeeping requirements of §63.10 and the following requirements for the monitoring parameters specified in §63.453:

For each applicable enclosure opening, closed-vent system, and closed collection system, the owner or operator shall prepare and maintain a site-specific inspection plan including a drawing or schematic of the components of applicable affected equipment and shall record the following information for each inspection:

(1) Date of inspection;

(2) The equipment type and identification;

(3) Results of negative pressure tests for enclosures;

(4) Results of leak detection tests;

(5) The nature of the defect or leak and the method of detection (i.e., visual inspection or instrument detection);

(6) The date the defect or leak was detected and the date of each attempt to repair the defect or leak;

(7) Repair methods applied in each attempt to repair the defect or leak;

(8) The reason for the delay if the defect or leak is not repaired within 15 days after discovery;

(9) The expected date of successful repair of the defect or leak if the repair is not completed within 15 days;

(10) The date of successful repair of the defect or leak;

(11) The position and duration of opening of bypass line valves and the condition of any valve seals; and

(12) The duration of the use of bypass valves on computer controlled valves.

[40 CFR 63.454(b)]

17.30 The owner or operator of an open biological treatment system complying with Permit Condition 17.28 shall prepare a written record specifying the results of the performance test specified in §63.453(p)(2).

[40 CFR 63.454(f)]

Reporting Requirements – 40 CFR 63.455

17.31 Each owner or operator of a source subject to this subpart shall comply with the reporting requirements of subpart A of this part as specified in Table 17.7 and all the following requirements:

17.32 The owner or operator shall meet the requirements specified in paragraph (a) of this section upon startup of any new affected process equipment or pulping process condensate stream that becomes subject to the standards of this subpart due to a process change or modification.

[40 CFR 63.455(d)]

17.33 If the owner or operator uses the results of the performance test required in §63.453(p)(2)(i.e. a performance test is conducted in response to daily parameter excursion) to revise the approved values or ranges of the monitoring parameters specified in §63.453(j)(1) or (2), the owner or operator shall submit an initial notification of the subsequent performance test to the Administrator as soon as practicable, but no later than 15 days, before the performance test required in §63.453(p)(2) is scheduled to be conducted. The owner or operator shall notify the Administrator as soon as practicable, but no later than 24 hours, before the performance test is scheduled to be conducted to confirm the exact date and time of the performance test.

[40 CFR 63.455(e)]

17.34 To comply with the open biological treatment system monitoring provisions of §63.453(p)(3), the owner or operator shall notify the Administrator as soon as practicable of the onset of the dangerous, hazardous, or otherwise unsafe conditions that did not allow a compliance determination to be conducted using the sampling and test procedures in §63.457(l). The notification shall occur no later than 24 hours after the onset of the dangerous, hazardous, or otherwise unsafe conditions and shall include the specific reason(s) that the sampling and test procedures in §63.457(l) could not be performed.

[40 CFR 63.455(f)]

Test Methods and Procedures – 40 CFR 63.457

17.35 The owner or operator shall follow the test methods and procedures specified by 40 CFR 63.457 for:

- Vent sampling port locations and gas stream properties

- Liquid sampling locations and properties
- Detectable leak procedures
- Negative pressure procedures
- HAP concentration measurement
- Bleaching HAP concentration measurement
- Vent stream calculations
- Liquid stream calculations
- Oxygen concentration correction procedures
- Biological treatment system percent reduction and mass removal calculations
- Condensate segregation procedures
- Open biological treatment system monitoring sampling storage

[40 CFR 63.457]

General Provisions of 40 CFR 63 Applicable to Subpart S

17.36 Generally applicable reporting, record keeping and notification requirements of Subpart A of the National Emission Standards for Hazardous Air Pollutants (NESHAP, 40 CFR 63) that are applicable to Subpart S are included in Table 17.7. The citations provide in the reference column is comprehensive listing of all applicable general provision requirements that apply. However, the summaries in the comment column are not a comprehensive description of what is required. The summaries are provided to highlight the requirements and do not relieve the permittee from the responsibility to comply with all applicable requirements of Subpart A. Should there be a conflict between these summaries and Table 1 in the NESHAP, the NESHAP shall govern.

[40 CFR 63.440 –Table 1]

Table 17.7 General Provisions Applicability to Subpart S[a] – 40 CFR 63.1-16

Citation Reference	Applies to Subpart S?	Comment
63.1(a)(1)–(3)	Yes	**Applicability Information – including but not limited to:** • No emission standard or other requirement established under this part shall be interpreted, construed, or applied to diminish or replace the requirements of a more stringent emission limitation or other applicable requirement established by the Administrator pursuant to other authority of the Act (section 111, part C or D or any other authority of this Act), or a standard issued under State authority. • For the purposes of this part, if an explicit postmark deadline is not specified in an applicable requirement for the submittal of a notification, application, test plan, report, or other written communication to the Administrator, the owner or operator shall postmark the submittal on or before the number of days specified in the applicable requirement. • Notwithstanding time periods or postmark deadlines specified in this part for the submittal of information to the Administrator by an owner or operator, or the review of such information by the Administrator, such time periods or deadlines may be changed by mutual agreement between the owner or operator and the Administrator. Procedures governing the implementation of this provision are specified in §63.9(i).
63.1(a)(4)	Yes	
63.1(a)(6)–(8)	Yes	
63.1(a)(11)–(14)	Yes	
63.1(b)(2)–(3)	Yes	
63.1(c)(1)–(2)	Yes	
63.1(c)(4)–(5)	Yes	
63.1(e)	Yes	
63.2	Yes	**Definitions**
63.3	Yes	**Units and abbreviations**
63.4(a)(1)	Yes	**Prohibited activities and circumvention – including but not limited to:**

63.4(a)(3)		No owner or operator subject to the provisions of this part shall build, erect, install, or use any article, machine, equipment, or process to conceal an emission that would otherwise constitute noncompliance with a relevant standard. Such concealment includes, but is not limited to the use of diluents to achieve compliance with a relevant standard based on the concentration of a pollutant in the effluent discharged to the atmosphere.
63.4(a)(5)	Yes	
63.4(b)	Yes	
63.4(c)	Yes	
63.5(a)	Yes	**Preconstruction review and notification requirements – including but not limited to:** • This section implements the preconstruction review requirements of section 112(i)(1). After the effective date of a relevant standard, promulgated pursuant to section 112(d), (f), or (h) of the Act, under this part, the preconstruction review requirements in this section apply to the owner or operator of new affected sources and reconstructed affected sources that are major-emitting as specified in this section. • After the effective date of any relevant standard promulgated by the Administrator under this part, no person may, without obtaining written approval in advance from the Administrator in accordance with the procedures specified in paragraphs (d) and (e) of this section, do any of the following: 1) Construct a new affected source that is major-emitting and subject to such standard; 2) Reconstruct an affected source that is major-emitting and subject to such standard
63.5(b)(1)	Yes	
63.5(b)(3)	Yes	
63.5(b)(4)–(6)	Yes	
63.5(d)	Yes	
63.5(e)	Yes	
63.5(f)	Yes	
63.6(a)	Yes	**Compliance with standards and maintenance – Including but not limited to:** •At all times, including periods of startup, shutdown, and malfunction, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. •The owner or operator of an affected source must develop a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction; and a program of corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with the relevant standard
63.6(e)	Yes	
63.6(f)	Yes	
63.6(g)	Yes	
63.6(i)	Yes	
63.6(j)	Yes	
63.7	Yes	**Performance testing requirements – Including but not limited to:** The owner or operator of an affected source must notify the Administrator in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is initially scheduled to begin to allow the Administrator, upon request, to review an approve the site-specific test plan required under paragraph (c) of this section and to have an observer present during the test.
63.8(a)(1)	Yes	**Monitoring requirements – Including but not limited to:** The owner or operator of an affected source shall maintain and operate each CMS as specified in this section, or in a relevant standard, and in a manner consistent with good air pollution control practices. • The owner or operator of an affected source must maintain and operate each CMS as specified in §63.6(e)(1). •The owner or operator must keep the necessary parts for routine repairs of the affected CMS equipment readily available. •The owner or operator of an affected source must develop a written startup, shutdown, and malfunction plan for CMS as specified in §63.6(e)(3). All CMS shall be installed, operational, and the data verified as specified in the relevant standard either prior to or in conjunction with conducting performance tests under §63.7. Verification of operational status shall, at a minimum, include completion of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system.
63.8(a)(2)	Yes	
63.8(a)(4)	Yes	
63.8(b)(1)	Yes	
63.8(b)(3)	Yes	
63.8(c)(1)	Yes	
63.8(c)(2)	Yes	
63.8(c)(3)	Yes	
63.8(c)(6)	Yes	
63.8(c)(7)	Yes	
63.8(c)(8)	Yes	

63.8(d)	Yes	The owner or operator of an affected source that is required to use a CMS and is subject to the monitoring requirements of this section and a relevant standard shall develop and implement a CMS quality control program. As part of the quality control program, the owner or operator shall develop and submit to the Administrator for approval upon request a site-specific performance evaluation test plan for the CMS performance evaluation required in paragraph (e)(3)(i) of this section, according to the procedures specified in paragraph (e). In addition, each quality control program shall include, at a minimum, a written protocol that describes procedures for each of the following operations: (i) Initial and any subsequent calibration of the CMS; (ii) Determination and adjustment of the calibration drift of the CMS; (iii) Preventive maintenance of the CMS, including spare parts inventory; (iv) Data recording, calculations, and reporting; (v) Accuracy audit procedures, including sampling and analysis methods; and (vi) Program of corrective action for a malfunctioning CMS.
63.8(e)	Yes	
63.8(f)(1)–(5)	Yes	
63.8(g)	Yes	
63.9(a)	Yes	**Notification requirements - Including but not limited to:** The owner or operator of an affected source shall notify the Administrator in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin to allow the Administrator to review and approve the site-specific test plan required under §63.7(c), if requested by the Administrator, and to have an observer present during the test. The owner or operator of an affected source required to use a CMS by a relevant standard shall furnish the Administrator written notification of the date the CMS performance evaluation under §63.8(e) is scheduled to begin, submitted simultaneously with the notification of the performance test date required under §63.7(b). If no performance test is required, or if the requirement to conduct a performance test has been waived for an affected source under §63.7(h), the owner or operator shall notify the Administrator in writing of the date of the performance evaluation at least 60 calendar days before the evaluation is scheduled to begin.
63.9(b)	Yes	
63.9(c)	Yes	
63.9(e)	Yes	
63.9(g)(1)	Yes	
63.9(h)	Yes	
63.9(i)	Yes	
63.9(j)	Yes	
63.10(a)	Yes	**Recordkeeping and reporting requirements - Including but not limited to:** The owner or operator of an affected source subject to the provisions of this part shall maintain files of all information (including all reports and notifications) required by this part recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The owner or operator of an affected source subject to the provisions of this part shall maintain relevant records for such source of— (i) The occurrence and duration of each startup or shutdown when the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards; (ii) The occurrence and duration of each malfunction of operation (*i.e.* , process equipment) or the required air pollution control and monitoring equipment; (iii) All required maintenance performed on the air pollution control and monitoring equipment; (iv)(A) Actions taken during periods of startup or shutdown when the source exceeded applicable emission limitations in a relevant standard and when the actions taken are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan (see §63.6(e)(3)); or (B) Actions taken during periods of malfunction (including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation) when the actions taken are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan (see §63.6(e)(3) The owner or operator of an affected source required to install a CMS by a relevant standard shall submit
63.10(b)	Yes	
63.10(c)	Yes	
63.10(d)(1)	Yes	
63.10(d)(2)	Yes	
63.10(d)(4)	Yes	
63.10(d)(5)	Yes	
63.10(e)(1)	Yes	
63.10(e)(2)(i)	Yes	
63.10(e)(3)	Yes	
63.10(f)	Yes	

		an excess emissions and continuous monitoring system performance report and/or a summary report to the Administrator semiannually (All excess emissions reports shall be delivered or postmarked by the 30th day following the end of each calendar half per40 CFR 6310(e)(3)).
63.11–63.15	Yes	**Delegations; Addresses; Incorporation by reference; Availability of information and confidentiality; and Performance Track Provisions**

Wherever subpart A specifies "postmark" dates, submittals may be sent by methods other than the U.S. Mail (e.g., by fax or courier). Submittals shall be sent by the specified dates, but a postmark is not required.

18. PAPER AND WEB COATING MACT - 40 CFR 63 SUBPART JJJJ

Summary Description

Hazardous air pollutant emissions from two paper board coating processes are regulated by the Paper and Other Coating MACT (40 CFR 63.3280). The paper coating MACT includes emissions standards which must be met by either using a capture system and control device, or by use of "as-purchased compliant coating materials". The permittee has elected to demonstrate compliance using the "as-purchased compliant coating materials" option.

The purpose of this section of the permit is to incorporate and summarize the applicable requirements of 40 CFR 63 Subpart S. Should there be a conflict between 40 CFR 63 and any of the permit conditions in Section 18 of this permit then 40 CFR 63 shall govern including any applicable amendments to that regulation

Table 18.1 contains summaries of the requirements that apply to the paper coating lines.

Table 18.1 - 40 CFR 63 Subpart JJJJ –SUMMARY OF APPLICABLE REQUIREMENTS FOR PAPER COATING LINES

Process Systems	Standards[a]	Compliance Demonstration	Record Keeping
Two paper coating lines	**40 CFR 63.3320** Organic HAP emissions must be limited to the level specified: 1) No more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources, and no more than 2 percent of the organic HAP applied for each month (98 percent reduction) at new affected sources; or 2) No more than 4 percent of the mass of coating materials applied for each month at existing affected sources, and no more than 1.6 percent of the mass of coating materials applied for each month at new affected sources; or 3) No more than 20 percent of the mass of coating solids applied for each month at existing affected sources, and no more than 8 percent of the coating solids applied for each month at new affected sources.	**40 CFR 63.3370** 1) Each coating material used at an existing affected source does not exceed 0.04 kg organic HAP per kg coating material, and each coating material used at a new affected source does not exceed 0.016 kg organic HAP per kg coating material as-purchased; or 2) Each coating material used at an existing affected source does not exceed 0.2 kg organic HAP per kg coating solids, and each coating material used at a new affected source does not exceed 0.08 kg organic HAP per kg coating solids as-purchased.	**40 CFR 63.3410** The permittee shall maintain records on a monthly basis in accordance with the requirements of §63.10(b)(1) of: 1) Organic HAP content data for the purpose of demonstrating compliance in accordance with the requirements of §63.3360(c); or 2) Volatile matter and coating solids content data for the purpose of demonstrating compliance in accordance with the requirements of §63.3360(d); and 3) Material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with the requirements of §63.3370(b), (c), and (d).

Emissions Standards - 40 CFR 63.3320

18.1 Organic HAP emissions must be limited to:

(1) No more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources, and no more than 2 percent of the organic HAP applied for each month (98 percent reduction) at new affected sources; or

(2) No more than 4 percent of the mass of coating materials applied for each month at existing affected sources, and no more than 1.6 percent of the mass of coating materials applied for each month at new affected sources; or

(3) No more than 20 percent of the mass of coating solids applied for each month at existing affected sources, and no more than 8 percent of the coating solids applied for each month at new affected sources.

[40 CFR 63.3320]

Performance Tests – 40 CFR 63.3360

18.2 The organic HAP content of coating materials shall be determined in accordance with 40 CFR 63.3360(c). This section specifies that Method 311, Method 24 or that manufacturer supplied formulation data must be used.

[40 CFR 63.3360(c)]

18.3 If the permittee chooses to use the volatile organic content as a surrogate for the organic HAP content of coatings then the procedures of 40 CFR 63.3360(d) shall apply. This section specifies that Method 24 or that manufacturer supplied formulation data must be used.

[40 CFR 63.3360(d)]

Compliance Demonstration – 40 CFR 63.3370

18.4 *As-purchased "compliant" coating materials.* If the permittee chooses to comply by using coating materials that individually meet the emission standards in Permit Condition 18.1(2) or (3), you must demonstrate that each coating material applied during the month at an existing affected source contains no more than 0.04 mass fraction organic HAP or 0.2 kg organic HAP per kg coating solids, and that each coating material applied during the month at a new affected source contains no more than 0.016 mass fraction organic HAP or 0.08 kg organic HAP per kg coating solids on an as-purchased basis as determined in accordance with §63.3360(c) (Permit Condition 18.2).

Compliance is demonstrated with emission standards in Permit Condition 18.1(2) or (3) if each coating material applied at an existing affected source is applied as-purchased and contains no more than 0.04 kg organic HAP per kg coating material or 0.2 kg organic HAP per kg coating solids, and each coating material applied at a new affected source is applied as-purchased and contains no more than 0.016 kg organic HAP per kg coating material or 0.08 kg organic HAP per kg coating solids.

[40 CFR 63.3370(b)]

18.5 *As-applied "compliant" coating materials.* If the permittee chooses to comply by using coating materials that meet the emission standards in Permit Condition 18.1(2) or (3) as-applied, you must demonstrate compliance by following one of the procedures in paragraphs (c)(1) through (4) of this 40 CFR 63.3370. These sections specify how the monthly HAP content must be determined for each coating material or how to determine the average HAP content of all coating material applied.

Compliance is determined in accordance with paragraph (c)(5) of this section. This section specifies how to calculate the monthly HAP applied and how to calculate the monthly allowable organic HAP emissions.

[40 CFR 63.3370(c)]

Notifications and Reports – 40 CFR 63.3400

18.6 Initial notification for new and reconstructed affected sources must be submitted as required by §63.9(b).
[40 CFR 63.3400(b)(2)]

18.7 The permittee shall submit semiannual compliance reports in accordance with §63.3400(c). Compliance reports must be postmarked or delivered no later than July 31 or January 31. The semiannual compliance reports shall cover the periods January 1 through June 30 and July 1 through December 31; or the reports may be submitted in accordance with the schedule established for semiannual reporting requirements for this Tier I operating permit in accordance with General Provision 24 if they are different from the periods listed above.

[40 CFR 63.3400(c)]

18.8 The semiannual compliance report shall contain all the applicable requirements of §63.3400(c)(2) including:

(i) Company name and address.

(ii) Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report.

(iii) Date of report and beginning and ending dates of the reporting period.

(iv) If there are no deviations from any emission limitations (emission limit or operating limit) that apply to you, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.

(v) For each deviation from an emission limitation (emission limit or operating limit) that applies to you and that occurs at an affected source where you are not using a CEMS to comply with the emission limitations in this subpart, the compliance report must contain the information in paragraphs (c)(2)(i) through (iii) of this section, and:

(A) The total operating time of each affected source during the reporting period.

(B) Information on the number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.

Recordkeeping – 40 CFR 63.3410

18.9 The permittee shall maintain the following records on a monthly basis:

- Records specified in §63.10(b)(2) of measurements needed to demonstrate compliance, including all documentation supporting initial notifications and notifications of compliance status under §63.9;
- Organic HAP content data for the purpose of demonstrating compliance in accordance with the requirements of §63.3360(c);
- Volatile matter and coating solids content data for the purpose of demonstrating compliance in accordance with the requirements of §63.3360(d);
- Material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with the requirements of §63.3370(b), (c), and (d).

[40 CFR 63.3410]

General Provisions of 40 CFR 63 Applicable to Subpart JJJJ

18.10 Generally applicable reporting, record keeping and notification requirements of Subpart A of the National Emission Standards for Hazardous Air Pollutants (NESHAP, 40 CFR 63) are included in Table 18.2. These summaries are provided to highlight the notification and record keeping requirements of 40 CFR 63 for affected facilities, and are not intended to be a comprehensive listing of all general provision requirements that may apply nor do the summaries relieve the permittee from the responsibility to comply with all applicable requirements of the CFR. Should there be a conflict between these summaries and the NESHAP, the NESHAP shall govern. The permittee is encouraged to read all of 40 CFR 63 Subpart A. The CFRs are available on-line at: http://www.gpoaccess.gov/cfr/index.html.

[40 CFR 63.3280 –Table 2]

Table 18.2 Summary of Applicable General Provisions

General provisions reference	Applicable to subpart JJJJ	Explanation
§63.1(a)(1)–(4)	Yes.	**Applicability Information – including but not limited to:** • No emission standard or other requirement established under this part shall be interpreted, construed, or applied to diminish or replace the requirements of a more stringent emission limitation or other applicable requirement established by the Administrator pursuant to other authority of the Act (section 111, part C or D or any other authority of this Act), or a standard issued under State authority. • For the purposes of this part, if an explicit postmark deadline is not specified in an applicable requirement for the submittal of a notification, application, test plan, report, or other written communication to the Administrator, the owner or operator shall postmark the submittal on or before the number of days specified in the applicable requirement. •Notwithstanding time periods or postmark deadlines specified in this part for the submittal of information to the Administrator by an owner or operator, or the review of such information by the Administrator, such time periods or deadlines may be changed by mutual agreement between the owner or operator and the Administrator. Procedures governing the implementation of this provision are specified in §63.9(i).
§63.1(a)(6)–(8)	Yes.	
§63.1(a)(10)–(14)	Yes.	
§63.1(b)(2)–(3)	Yes.	
§63.1(c)(1)	Yes.	
§63.1(c)(4)	Yes.	
§63.1(c)(5)	Yes.	
§63.1(e)	Yes.	
§63.2	Yes	**Additional definitions in subpart JJJJ.**
§63.3(a)–(c)	Yes.	**Units and abbreviations**

§63.4(a)(1)–(3)	Yes.	**Prohibited activities and circumvention – including but not limited to:** No owner or operator subject to the provisions of this part shall build, erect, install, or use any article, machine, equipment, or process to conceal an emission that would otherwise constitute noncompliance with a relevant standard. Such concealment includes, but is not limited to the use of diluents to achieve compliance with a relevant standard based on the concentration of a pollutant in the effluent discharged to the atmosphere.
§63.4(a)(5)	Yes.	
§63.4(b)–(c)	Yes.	
§63.5(a)(1)–(2)	Yes.	**Preconstruction review and notification requirements – including but not limited to:** • This section implements the preconstruction review requirements of section 112(i)(1). After the effective date of a relevant standard, promulgated pursuant to section 112(d), (f), or (h) of the Act, under this part, the preconstruction review requirements in this section apply to the owner or operator of new affected sources and reconstructed affected sources that are major-emitting as specified in this section. • After the effective date of any relevant standard promulgated by the Administrator under this part, no person may, without obtaining written approval in advance from the Administrator in accordance with the procedures specified in paragraphs (d) and (e) of this section, do any of the following: 1) Construct a new affected source that is major-emitting and subject to such standard; 2) Reconstruct an affected source that is major-emitting and subject to such standard
§63.5(b)(1)	Yes.	
§63.5(b)(3)–(6)	Yes.	
§63.5(d)	Yes.	
§63.5(e)	Yes.	
§63.5(f)	Yes.	
§63.6(a)	Yes	Applies only when capture and control system is used to comply with the standard.
§63.6(c)(1)–(2)	Yes.	Compliance dates
§63.6(e)	Yes	Provisions pertaining to SSMP, and CMS do not apply unless an add-on control system is used to comply with the emission limitations.
§63.6(f)	Yes.	Compliance required at all times except startup, shutdown and malfunction
§63.6(g)	Yes.	Alternatives standards must be approved by the Administrator
§63.6(i)(1)–(14)	Yes.	Compliance extensions
§63.6(i)(16)	Yes.	
§63.6(j)	Yes.	Presidential Exemption
§63.7	Yes.	Performance testing – Notifications, etc.
§63.9(a)	Yes.	
§63.9(b)(1)	Yes.	Initial notification requirements
§63.9(b)(2)	Yes	Except §63.3400(b)(1) requires submittal of initial notification for existing affected sources no later than 1 year before compliance date.
§63.9(b)(3)–(5)	Yes.	Required approval for new construction or modification
§63.9(c)–(e)	Yes.	Included requirements for notification of compliance tests
§63.9(g)	Yes	Provisions for COMS are not applicable.
§63.9(h)(1)–(3)	Yes.	Notifications required of compliance status
§63.9(h)(5)–(6)	Yes.	
§63.9(i)	Yes.	Adjustments to time periods
§63.9(j)	Yes.	Change in information that has already been provided
§63.10(a)	Yes.	
§63.10(b)(1)–(3)	Yes	§63.10(b)(2)(i) through (v) only apply if you use a capture and control system.
§63.10(c)(1)	Yes.	Only apply if a CMS is used
§63.10(c)(5)–(8)	Yes.	
§63.10(c)(10)–(15)	Yes.	
§63.10(d)(1)–(2)	Yes.	General Reporting Requirements
§63.10(d)(4)–(5)	Yes.	

§63.10(e)(1)–(2)	Yes	Only applicable if CMS is used - Provisions for COMS are not applicable.
§63.10(f)	Yes.	Waiver for record keeping
§63.12	Yes.	State authority and delegation
§63.13	Yes.	Addresses
§63.14	Yes	Subpart JJJJ includes provisions for alternative ASME test methods that are incorporated by reference.
§63.15	Yes.	Availability of information and confidentiality

19. COMPLIANCE ASSURANCE MONITORING - 40 CFR 64

Summary Description

The purpose of this section of the permit is to include all of the applicable requirements of Compliance Assurance Monitoring (CAM) 40 CFR 64. CAM requires selecting compliance indicators that when operated within specified ranges provide a reasonable assurance of compliance, it also requires monitoring, recordkeeping, and reporting requirements.

19.1 Table 19.1 lists the emissions units and pollutants that are applicable to CAM and details the monitoring requirements for each emissions unit which the Permittee shall comply with.

Table 19.1 Summary of Compliance Assurance Monitoring

Emission Unit/Pollutant	Indicator - 40 CFR 64.6(c)(1)(i)	Monitoring Means/Device & Performance Requirements - 40 CFR 64.6(c)(1)(ii)
#4 Power Boiler/PM	Opacity	COMs , Install and operate using the methods and procedures in 40 CFR 60.13
#4 Recovery Furnace/PM	Opacity	COMs in accordance with 40 CFR 63.864(d)
#4 Smelt Dissolving Tank/PM	Pressure Drop & Scrubbing media flow rate	Continuous parameter monitoring (CPM) required by 40 CFR 63.864(e)(10) (Tier I permit Condition 5.8)
#5 Recovery Furnace/PM	Opacity	COMs in accordance with 40 CFR 63.864(d)
#5 Smelt Dissolving Tank/PM	Fan Load & Scrubbing media flow rate (See Table 5.2)	Continuous parameter monitoring (CPM) required by 40 CFR 63.864(e)(10) (Tier I permit Condition 5.8)
#3 Lime Kiln/PM	Opacity	COMs in accordance with 40 CFR 63.864(d)
#4 Lime Kiln/PM	Opacity	COMs in accordance with 40 CFR 63.864(d)
#2 Lime Kiln/PM	Pressure Drop & Scrubbing media flow rate	Monitor and record pressure drop and scrubbing media flow rate at least once every successive 15-minute period using the procedures in 40 CFR 63.8(c) and 40 CFR 63.864(e)(10)
Dry Fuel Bin/PM	Opacity	Visual Observation (see/no see) once each calendar day
Non-condensable Gas Incinerator/SO_2	Scrubber Liquid pH & Scrubber Liquid Flow	Continuous pH sensor in recirculation line/ sensor accuracy shall be assessed once a month and shall be calibrated annually. pH recorded once per hour. Continuous magnetic flow sensor/shall be calibrated annually. Flow is recorded once per hour.

[40 CFR 64.6(c)(1)(i)& (ii)]

19.2 Table 19.2 specifies the specific values that are approved to determine when an excursion has occurred.

Table 19.2 Indicators of Excursion

Emission Unit	Indicators of an Excursion
#4 Power Boiler	Opacity measured by COMs ≥ 15%, 3-hr block average
#4 Smelt Dissolving Tank	Scrubbing media flow rate < 43 gpm, 3-hr block average; Pressure drop < 17 inches water gage, 3-hr block average
#5 Smelt Dissolving Tank	Scrubbing media flow rate <350 gallons per minute, 3-hr block average; Fan load < 55% (See Table 5.2 of this permit)
Dry Fuel Bin	Any visible emissions observed during daily observation
Non-condensable Gas Incinerator	Scrubber liquid pH < 9.6, 3-hr block average Scrubber liquid flow < 326 gallons per minute, 3-hr block average
#4 Recovery Furnace	Opacity > 20% (average of 10 consecutive 6-minute averages)
#5 Recovery Furnace	Opacity > 20% (average of 10 consecutive 6-minute averages)
#3 Lime Kiln	Opacity > 20% (average of 10 consecutive 6-minute averages)
#4 Lime Kiln	Opacity > 20% (average of 10 consecutive 6-minute averages)

[40 CFR 64.6(c)(2)]

19.3 Table 19.3 specifies details of conditional approval of the CAM plan for the #2 Lime Kiln in accordance with 40 CFR 64.6(b). The monitoring method is approved on the condition that the permittee shall collect data and/or analyze existing available data, including performance testing data and opacity data, in order to determine a proposed value of the indicator values which defines when an excursion has occurred. Proposed indicator ranges shall be submitted no later than 180 days after startup of the #2 Lime Kiln.

Table 19.3 Conditionally Approved Monitoring and Schedule for Testing

Emission Unit	Approved Monitoring Means	Indicator	Proposed Indicator Value	Schedule for Developing Indicator Ranges
#2 Lime Kiln	Monitor and record pressure drop and scrubbing media flow rate at least once every successive 15-minute period using the procedures in 40 CFR 63.8(c) and 40 CFR 63.864(e)(10)	Pressure drop across the scrubber; and Scrubbing media flow rate	To be determined after startup of the #2 Lime Kiln	No later than 180 days after startup of the #2 Lime Kiln - 40 CFR 64.7(a)

[40 CFR 64.6(b)]

19.4 The permittee shall submit proposed scrubber pressure drop and scrubbing media flow rate indicator ranges for the #2 Lime Kiln for DEQ approval within 180 days of startup of the #2 Lime Kiln. The indicator ranges shall assure compliance with the following emissions standard:

- PM – 0.12 gr/dscf @ 10% O_2 (Permit Condition 11.1)

[40 CFR 64.7(a)]

19.4.1 When submitting any proposed indicator ranges the permittee shall satisfy the submittal requirements of 40 CFR 64.4.

[40 CFR 64.4]

19.4.2 If the permittee does not submit the information required by Permit Condition 19.4, and 19.4.1 within 180 days of startup of the #2 Lime Kiln or if DEQ disapproves the monitoring submitted, the permittee shall be deemed not in compliance with 40 CFR 64, unless the permittee successfully challenges the disapproval.

[40 CFR 64.6(d) & 40 CFR 64.6(e)(3)]

19.5 The permittee shall conduct the monitoring required under this permit upon issuance.

[40 CFR 64.7(a)]

19.6 At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[40 CFR 64.7(b)]

19.7 Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

[40 CFR 64.7(c)]

19.8 Upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

[40 CFR 64.7(d)]

19.9 After approval of monitoring under 40 CFR 64, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions,

the owner or operator shall promptly notify DEQ and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[40 CFR 64.7(e)]

19.10 DEQ may require the owner or operator to develop and implement a quality improvement plan (QIP) in accordance with 40 CFR 64.8(a) if an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period occurs.

[40 CFR 64.8(a)]

19.11 The reports required by General Provision 24 and 25 shall include the following information for those emissions units affected by 40 CFR 64 and listed in Table 19.1:

- Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable).

[40 CFR 64.9(a)(2)]

19.12 Should there be a conflict between 40 CFR 64 and Permit Conditions 19.5 through 19.11 of this permit then 40 CFR 64 shall govern.

[IDAPA 58.01.01.322.02]

20. INSIGNIFICANT ACTIVITIES

Insignificant activities are listed in Table 2-2 of Clearwater's June 19, 2007 Tier I renewal application.

21. TIER I OPERATING PERMIT GENERAL PROVISIONS

General Compliance

1. The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.
[IDAPA 58.01.01.322.15.a; 40 CFR 70.6(a)(6)(i)]

2. It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.
[IDAPA 58.01.01.322.15.b; 40 CFR 70.6(a)(6)(ii)]

3. Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.
[IDAPA 58.01.01.315.01; 40 CFR 70.5(b)]

Reopening

4. This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.
[IDAPA 58.01.01.322.15.c; IDAPA 58.01.01.386, 3/19/99;
40 CFR 70.7(f)(1) and (2); 40 CFR 70.6(a)(6)(iii)]

5. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[IDAPA 58.01.01.322.15.d; 40 CFR 70.6(a)(6)(iii)]

Property Rights

6. This permit does not convey any property rights of any sort, or any exclusive privilege.
[IDAPA 58.01.01.322.15.e; 40 CFR 70.6(a)(6)(iv)]

Information Requests

7. The permittee shall furnish all information requested by DEQ, within a reasonable time, that DEQ may request 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; IDAPA 58.01.01.322.15.f; 40 CFR 70.6(a)(6)(v)]

8. Upon request by DEQ, the permittee shall furnish 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; IDAPA 58.01.01.128; 40 CFR 70.6(a)(6)(v)]

Severability

9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

[IDAPA 58.01.01.322.15.h94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

10. 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 shall comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223; IDAPA 58.01.01.322.15.i, 380-386;

40 CFR 70.4(b)(12), (14) and (15), and 70.7(d) and (e)]

11. 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 USC Permit Condition 7651 through 7651c, or are modifications under Title I of the CAA, 42 USC Permit Condition 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) charges 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; IDAPA 58.01.01.209.05;

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

Federal and State Enforceability

12. Unless specifically identified as a "state-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) by DEQ in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j; 40 CFR 70.6(b)(1) and (2)]

13. Provisions specifically identified as a "state-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal Clean Air Act, or

under any of its applicable requirements, or those provisions adopted by the state prior to federal approval.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.k]

Inspection and Entry

14. Upon presentation of credentials, the permittee 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.i; 40 CFR 70.6(c)(2)]

New Requirements During Permit Term

15. The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

[IDAPA 58.01.01.322.10; IDAPA 58.01.01.314.10.a.ii;

40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

16. The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.525 through IDAPA 58.01.01.538.

[IDAPA 58.01.01.322.15.n; 40 CFR 70.6(a)(7)]

Certification

17. 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; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

18. a. The owner or operator of a Tier I source 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 expiration.

[IDAPA 58.01.01.313.03; 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; 40 CFR 70.7(b)]

Permit Shield

19. 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 in 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. Permit Condition 7651(g)(a); and

iv. The ability of EPA to obtain information from a source pursuant to Permit Condition 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, 322.15.m, 325;

IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03;

40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

20. 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.

    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; IDAPA 58.01.01.314.9, 10; 40 CFR 70.6(c)(3) and (4)]

Periodic Compliance Certification

21. The permittee 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 January 1 to December 31 or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by DEQ.

    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, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA which prohibits knowingly making a false certification or omitting material information;

        iii. The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Paragraph 21.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.

iv. Such other facts as DEQ may require to determine the compliance status of the source.

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; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946; 40 CFR 70.6(c)(5)(iv)]

False Statements

22. No person shall knowingly 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]

No Tampering

23. No person shall knowingly 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]

Semiannual Monitoring Reports

24. In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months. The permittee's semiannual reporting periods shall be from January 1 to June 30 and July 1 to December 31. 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; IDAPA 58.01.01.322.08.c; 40 CFR 70.6(a)(3)(iii)]

Reporting Deviations and Excess Emissions

25. The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.

[IDAPA 58.01.01.322.15.q; IDAPA 58.01.01.135; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required

26. No permit revision shall 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; 40 CFR 70.6(a)(8)]

Emergency

27. 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; 40 CFR 70.6(g)]