

**Paula Wilson**

---

**From:** McIntyre, Krista K. [KKMCINTYRE@stoel.com]

**Sent:** Tuesday, December 14, 2010 11:47 AM

**To:** Lisa Carlson; Paula Wilson

**Cc:** Susan Somers; Marv Lewallen

**Subject:** Docket 58-0101-1003

**Attachments:** image003.gif

IDEQ: Please accept these wordsmith comments on the kraft pulp mill rules. Krista McIntyre (on behalf of Clearwater Paper)

**815**

The purpose of Sections 815 through 818 is to establish emission standards for recovery furnaces; and notification and reporting requirements for LVHC and HVLC gas venting at kraft pulping mills.

**818.**

Section 818 is applicable to kraft pulp mill LVHC and HVLC gas venting from sources required to be controlled pursuant to 40 CFR 63, Subpart S. For purposes of Sections 130 through 136, an excess emission is defined as a continuous uncontrolled NCG gas venting in excess of five (5) minutes.

Excess emissions notification

and reporting shall be conducted pursuant to the requirements contained in Sections 130 through 136 and the permit issued to the kraft pulp mill.