

## PERMIT TO CONSTRUCT

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**Permittee** Clearwater Paper Corp. - PPD & CPD

**Permit Number** P-2011.0123

**Project ID** 60924

**Facility ID** 069-00001

**Facility Location** 801 Mill Road, Lewiston, Idaho

### **Permit Authority**

This permit (a) is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228; (b) pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit; and (c) has been granted on the basis of design information presented with its application. Changes in design, equipment or operations may be considered a modification.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

**Date Issued** January Draft

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**Dan Pitman, P.E., Permit Writer**

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## PERMIT TO CONSTRUCT SCOPE

### *Purpose*

1. This permit to construct is to satisfy the requirements of the July 5, 2011 Consent Order (Case E-2010.0019).
2. The emission sources regulated by this permit are listed in the following table.

**Table 1 REGULATED SOURCES**

<b>Source Descriptions</b>	<b>Control Equipment</b>
Tissue Converting Lines VOC emissions	No VOC Controls

## CONVERTING LINES – USE OF INKS, ADHESIVES AND COATINGS

### **Process Description**

3. Process Description

Clearwater Paper Corporation produces various tissue products (bathroom tissue, towels, napkins, facial tissue & other products). Large rolls of tissue paper are made in one of three “tissue” machines (1L, 2L, & 3L). These large rolls, called parent rolls, are then transformed into tissue products in production lines called converters. The converting lines utilize inks, adhesives and coatings.

4. Emission Controls Description

**Table 2 CONVERTING LINE DESCRIPTION**

Emissions Units / Processes	Emission Control Devices
Converting Lines VOC Emissions	No VOC Controls

### **Emission Limits**

5. Volatile organic compound (VOC) emissions from the converting lines shall not exceed 39 tons in any consecutive 12-calendar month period. For the purpose of this permit converters shall be considered any process or emission unit downstream from the tissue machines (1L, 2L, & 3L) up to and including final product packaging.
6. The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere of such nature and duration and under such conditions as would be injurious to human health or welfare, to animal or plant life, or to property, or to interfere unreasonably with the enjoyment of life or property in accordance with IDAPA 58.01.01.776.

### **Operating Requirements**

7. Each ink, adhesive and coating change shall:
- qualify for an exemption from the need to obtain a permit to construct as specified at IDAPA 58.01.01. 223, or
  - the use of the ink, adhesive or coating shall be regulated by 40 CFR 63 Subpart KK.

### **Monitoring and Recordkeeping Requirements**

8. The permittee shall:
- within 30 days of permit issuance develop a list of the names of each ink, adhesive and coating currently used in the converting lines and maintain manufacturer supplied documentation of the VOC and TAP content of each; and
  - document the name, and the date of the initial use, of new inks, adhesives and coatings, and maintain manufacturer supplied documentation of the VOC and TAP content of each.
9. Each month the permittee shall monitor and record the tons of each ink, adhesive and coating that is used in the converting lines during the most recent 12-calendar month period.

10. Each month the permittee shall calculate and record the tons of VOC emissions from the converting lines during the most recent 12-calendar month period. VOC emissions shall be calculated by assuming all VOCs in the inks, adhesives and coatings are emitted.

## PERMIT TO CONSTRUCT GENERAL PROVISIONS

### **General Compliance**

11. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.

**[Idaho Code §39-101, et seq.]**
12. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

**[IDAPA 58.01.01.211, 5/1/94]**
13. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.

**[IDAPA 58.01.01.212.01, 5/1/94]**

### **Inspection and Entry**

14. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
  - i. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
  - ii. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - iv. 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]**

### **Construction and Operation**

15. This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

**[IDAPA 58.01.01.211.02, 5/1/94]**
16. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
  - i. A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;

- ii. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- iii. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- iv. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date.

[IDAPA 58.01.01.211.03, 5/1/94]

### ***Performance Testing***

- 17. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ, at its option, may have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.
- 18. All performance 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, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.
- 19. Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

### ***Monitoring and Recordkeeping***

- 20. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this 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 and 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 58.01.01.211, 5/1/94]

### ***Excess Emissions***

- 21. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

### ***Certification***

22. All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

**[IDAPA 58.01.01.123, 5/1/94]**

### ***False Statements***

23. 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, 3/23/98]**

### ***Tampering***

24. 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, 3/23/98]**

### ***Transferability***

25. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

**[IDAPA 58.01.01.209.06, 4/11/06]**

### ***Severability***

26. 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 58.01.01.211, 5/1/94]**