



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

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

April 13, 2008

Certified Mail No. 7190 0596 0014 0000 6077

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 Permit Letter

Dear Mrs. Somers:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2009.0020 to Clearwater Paper Corporation for its Lime Handling System at Lewiston, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on February 19, 2009. This permit is effective immediately and replaces PTC No. 1140-00001, issued on September 9, 1988, the terms and conditions of which no longer apply. This permit does not release Clearwater Paper Corporation from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

As you requested, the permit to construct is being incorporated into the Tier I operating permit renewal which is currently being processed.

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 contact Dan Pitman at (208) 373-0502 or daniel.pitman@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\DP\hp

Project No. P-2009.0020

Enclosure



**Air Quality
PERMIT TO CONSTRUCT
State of Idaho
Department of Environmental Quality**

PERMIT No.: P-2009.0020

FACILITY ID No.: 069-00001

AQCR: 62 **CLASS:** A **ZONE:** 11

SIC: 2611 **NAICS:** 32210

UTM COORDINATE (km): 501.9, 5141.3

1. PERMITTEE

Clearwater Paper Corporation, Idaho Pulp and Paper Division, Lewiston

2. PROJECT

Lime Handling System – Remove Lime Handling Emission Rate Limits

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

Frank Radle

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 permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, and 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.

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.

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

This permit has been granted on the basis of design information presented with its application. Changes in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.

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

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE MODIFIED/REVISED:

April 13, 2009

DATE ISSUED:

September 9, 1988

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Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
gr	grain (1 lb = 7,000 grains)
HAP	hazardous air pollutant
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pounds per hour
m	meter(s)
$\mu\text{g}/\text{m}^3$	micrograms per cubic meter
MMBtu	million British thermal units
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
PTE	potential to emit
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per year
TAP	toxic air pollutant
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2009.0020

Permittee:	Clearwater Paper Corporation, Pulp & Paper Division	Facility ID No. 069-00001
Location:	Lewiston, Idaho	

1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 The purpose of this action is to remove emission rate limits for the lime handling system. Emission rates from the lime handling system which are controlled by a baghouse are below rates which require specific emission rate limits. Actual emission rates remain unchanged.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by a date citation located directly under the permit condition and on the right hand margin.
- 1.3 This PTC replaces PTC No. 1140-00001, issued on September 9, 1988, the terms and conditions of which shall no longer apply.

Regulated Sources

- 1.4 Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control
2	Lime Slaking	Wet Scrubber
2	Lime Handling	Baghouse

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2. LIME SLAKING AND ASSOCIATED LIME HANDLING

2.1 Process Description

Lime is transferred from the line kilns to the slaker unit, where it is slaked and regenerated back into the cooking cycle. Lime from kiln No. 4 drops onto pan conveyor No. 1, and then the lime is transferred to bucket elevator No. 1. Lime from kilns 2 and 3 will drop onto pan conveyor No. 2 and then the lime is conveyed to bucket elevator No. 2. From both bucket elevators, lime will be transported to a common storage bin. From the bottom of the storage bin, lime is metered to the slaker feed and on to the slaker where it is mixed with green liquor. The reaction of the lime and green liquor results in a solution called white liquor. This white liquor is returned and used in the cooking cycle where initial separation of cellulose fibers from lignin and other non-cellulose portions of wood begins. The lime mud that settles out of the slaker is returned to the lime kiln after washing and filtering.

2.2 Emissions Control Description

Fugitive dust emissions associated with the lime handling equipment will be collected by ducts and vented to the lime handling baghouse, the gases out of which are vented through the lime handling stack.

Emissions associated with the lime slaking unit are controlled by a scrubber, the gases out of which are vented through a stack.

Table 2.1 provides a summary of emissions controls on the lime handling and slaking process.

Table 2.1 LIME SLAKING AND ASSOCIATED HANDLING DESCRIPTION

Emissions Unit / Process	Emissions Control Device	Emissions Point
Lime Slaker: 25 foot diameter 27, 530 gallon capacity	Wet Scrubber: Manufacturer – Goslin 100-200 gallons per minute	Slaker Scrubber Stack
Lime Handling	Baghouse	Lime Handling Baghouse Stack

Emissions Limits

2.3 Emissions Limits

Slaker Scrubber Stack

2.3.1 Particulate emissions shall not exceed 1.72 pounds 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(s) to this stack operate(s).

2.3.2 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 emission rate by the actual hours per year that the process(es) which vent(s) to this stack operate(s).

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Operating Requirements

- 2.4 A baghouse shall be used to control emissions from lime handling. [04/13/2009]
- 2.5 Maintenance for the lime handling baghouse shall be performed if visible emissions from the lime handling stack exceed 5 percent opacity.
- 2.6 Maintenance to the slaker scrubber shall be performed if visible emissions from the slaker scrubber stack exceed 10 percent opacity.

Monitoring and Recordkeeping Requirements

- 2.7 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 2.5 or 2.6, 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. [04/13/2009]

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Location: Lewiston, Idaho

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3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

1. 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.]
2. 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]
3. 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

4. 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 an emissions 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]

Construction and Operation Notification

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
 - a. A notification of the date of initiation of construction, within five working days after occurrence;
 - b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
 - c. 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;

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- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211, 5/1/94]

Performance Testing

- 6. 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 may, at its option, 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.

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.

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

- 7. 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]

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Excess Emissions

8. 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

9. 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

10. 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

11. 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

12. 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

13. 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.h, 5/1/94; 40 CFR 70.6(a)(5)]