

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



M/S 532

DEC 8 1984

Jerald Cran
Potlatch Corporation
P.O. Box 1016
Lewiston, Idaho 83501

Dear Mr. Cran:

We have evaluated your application for a Prevention of Significant Deterioration (PSD) permit to construct the No. 5 recovery boiler at the Lewiston, Idaho mill and have determined that the project will meet the requirements of the PSD permit regulations and the Clean Air Act. Accordingly, on the basis of the complete PSD permit application, EPA hereby grants its approval to the Potlatch Corporation to construct the recovery boiler to the terms and conditions contained in the enclosed permit. Also enclosed is EPA's Final Determination Analysis Document for this project.

Because no comments were received on the draft permit and no substantive changes have been made in the final permit, the permit is effective immediately.

Sincerely,

Gary L. O'Neal, Director
Air and Toxics Division

Enclosure

Final:Nye:jj:11/30/84

6736X

		CONCURRENCES					
SURNAME	NYE JOHNSTON	RES SMITH					
DATE	11/3/84	11/3/84					



FINAL DETERMINATION ANALYSIS DOCUMENT
PREVENTION OF SIGNIFICANT DETERIORATION

APPROVAL OF CONSTRUCTION OF THE
No.5 RECOVERY BOILER AT
LEWISTON, IDAHO

Scope

This document presents the final determination by the Environmental Protection Agency (EPA) to approve Potlatch Corporation's proposed construction of the No.5 recovery boiler at the Lewiston, Idaho mill under the Federal requirements of Part C, Title 1, of the Clean Air Act; "Prevention of Significant Deterioration of Air Quality (PSD)."

Background

On July 5, 1984, EPA Region 10 received from the Potlatch Corporation a complete PSD permit application requesting approval to construct a new recovery boiler at the Lewiston, Idaho mill. EPA reviewed this application and presented its findings in a preliminary determination document which was released for public comment and published in the "Lewiston Morning Tribune" on November 1, 1984. Affected governmental agencies and the general public were notified of their opportunity to submit written comments and request a public hearing regarding EPA's preliminary determination.

Public Comment

No comments and no requests for public hearings were received.

Findings

Based upon our review of the application, EPA finds that the National Ambient Air Quality Standards and PSD increments will not be exceeded as a result of this project and that the proposed facility will employ Best Available Control Technology (BACT). In light of these findings, EPA grants approval to the Potlatch Corporation to construct the subject recovery boiler. This approval is subject to the terms and conditions set forth in the letter of approval to the Potlatch Corporation .

1 3. The proposed construction is located in an area designated as "Class II"
2 under Section 162(b) of the Clean Air Act.

3 4. Modeling analysis of NO_x, CO, and SO₂ has been conducted and
4 demonstrates that while emissions of these pollutants will increase, the
5 modifications will not cause any violations of the applicable National
6 Ambient Air Quality Standards or PSD increments so long as the proposed
7 sources are operated in accordance with the conditions specified below.
8 With the application of best available control technology, as required by
9 Section 165(a)(4), operation of these sources will meet the applicable PSD
10 requirements.

11 Accordingly, it is hereby determined that, subject to the conditions set
12 forth below, the Potlatch Corporation will be permitted to operate the
13 subject source at Lewiston, Idaho mill.

14 APPROVAL CONDITIONS

15 1. Emissions of nitrogen oxides (NO_x), carbon monoxide (CO), and sulfur
16 dioxide (SO₂) shall not exceed the following:

17 EMISSION LIMITATIONS

18 Facility	19 Pollutant (1)	20 Pounds Per Hour	21 Tons Per Year	22 Parts Per Million (2)
	SO ₂	450	1960	200
No. 5 Recovery Boiler	CO	880	3850	900
	NO _x	320	1400	200

23 1. SO₂ and NO_x will be reevaluated based on actual operating experience.

24 2. The concentration limitations are on a dry bases at 8% oxygen. The
25 SO₂ and CO concentration and hourly mass emission limitations
26 represent the average over each 24-hour day. The NO_x value
27 represents the average value determined by EPA Method 7.

1 2. With the exception of NO_x, CO, and SO₂ increases in potential
2 emissions of any pollutant regulated under the Clean Air Act resulting from
3 this construction will be less than the significant levels [Section
4 52.21(b)(23)(i)].

5 3. The Potlatch Corporation shall notify the Idaho Department of Health and
6 Welfare (IDHW) of any occurrence of any emissions in excess of limits
7 specified in Condition Numbers 1 and 2 above; such notification shall be
8 forwarded to IDHW in writing in a timely fashion and in each instance no
9 later than ten (10) days from the date of such occurrence. The notification
10 shall include an estimate of the resultant emissions and a narrative report
11 of the cause, duration and steps taken to correct the problem and avoid a
12 recurrence. The Potlatch Corporation shall contemporaneously send a copy of
13 all such reports to EPA.

14 4. This approval shall become void if on-site construction is not commenced
15 within eighteen (18) months after receipt of the approval or if on-site
16 construction once initially commenced is discontinued for a period of
17 eighteen (18) months.

18 5. As approved and conditioned by this permit, any construction,
19 modification or operation of the proposed sources shall be in accordance
20 with the application which resulted in this permit. Moreover, any such
21 activity which is undertaken by the Potlatch Corporation, or others, in a
22 manner which is inconsistent with this permit shall be subject to EPA
23 enforcement under the Clean Air Act. Nothing in this permit shall be
24 construed to relieve the Potlatch Corporation of its obligations under any
25 state or federal laws including Sections 303 and 114 of the Clean Air Act.

26 6. The SO₂ emission limitations shall be reevaluated based on actual
27 operating experience one year after startup of the No.5 recovery boiler and

1 again one year after the No. 5 recovery boiler achieves operation at full
2 capacity (4,000,000 lb/day or greater of black liquor solids). The NO_x
3 emission limitation shall be reevaluated one year after the No.5 recovery
4 boiler achieves operation at full capacity.

5 7. Compliance with emission limitations shall be demonstrated by source
6 tests and a program of emission monitoring as described below:

7 a. Compliance Testing - Compliance testing shall be conducted within 60
8 days after achieving the normal production rate at which the No. 5
9 recovery boiler will be operated, but not later than 180 days after
10 startup of the boiler. EPA method 6 shall be used for SO₂ and EPA
11 Method 10 for CO. EPA method 7 or Method 20 shall be used for NO_x.
12 The Company shall submit a test plan to EPA and IDHW for approval prior
13 to testing.

14 b. Compliance Monitoring: A continuous monitoring system shall be
15 installed to monitor CO and SO₂. These monitors shall comply with the
16 specification requirements in Appendix B of 40 CFR Part 60.

17 8. EPA and IDHW shall be notified in writing of the commencement of
18 construction and the startup date within thirty (30) days of the date of
19 their occurrence.

20 Access to the source by EPA or State regulatory personnel will be
21 permitted upon request for the purpose of compliance assurance inspection.
22 Failure to allow such access is grounds for revocation of this permit.

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24
25
26 _____
Date

Randall J. Smith
for Gary L. O'Neal, Director
Air and Toxics Division