

Statement of Basis

**Permit to Construct No. P-2011.0101
Project No. 60865**

**Clearwater Paper Corporation
Lewiston Facility, Idaho Pulp and Paperboard Division
Lewiston, Idaho**

Facility ID No. 069-00001

Final

February 2, 2012
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**The purpose of this Statement of Basis is to satisfy the requirements of
IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho,
for issuing air permits.**

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
acfm	actual cubic feet per minute
acfs	actual cubic feet per second
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
BMP	best management practices
Btu	British thermal units
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CaO	lime
CAS No.	Chemical Abstracts Service registry number
CBP	concrete batch plant
CEMS	continuous emission monitoring system
CERMS	continuous emission rate monitoring system, as defined as defined in 40 CFR 60 Appendix B, Performance Specification 6
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CGA	Cylinder Gas Audit
CI	compression ignition
Clearwater	Clearwater Paper Corporation
CO	carbon monoxide
COMS	continuous opacity monitoring system
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
ESP	electrostatic precipitator
FEC	Facility Emissions Cap
gpm	gallons per minute
gph	gallons per hour
gr	grain (1 lb = 7,000 grains)
HAP	hazardous air pollutants
HMA	hot mix asphalt
hp	horsepower
hr/yr	hours per year
ICE	internal combustion engines
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometers
lb/hr	pounds per hour
lb/qtr	pound per quarter
m	meters
MACT	Maximum Achievable Control Technology
mg/dscm	milligrams per dry standard cubic meter
MMBtu	million British thermal units
MMscf	million standard cubic feet
NAAQS	National Ambient Air Quality Standard

NAICS	North American Industry Classification System
NCG	Noncondensable gas. Noncondensable gases are also called low volume, high concentration (LVHC) gases
ND	no data provided by the applicant
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
PAH	polyaromatic hydrocarbons
PC	permit condition
PCB	polychlorinated biphenyl
PERF	Portable Equipment Relocation Form
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
POM	polycyclic organic matter
ppm	parts per million
PS2	Performance Specification 2
PS5	Performance Specification 5
PS6	Performance Specification 6
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTC/T2	permit to construct and Tier II operating permit
PTE	potential to emit
RA	relative accuracy
RAP	recycled asphalt pavement
RATA	relative accuracy test audit
RFO	reprocessed fuel oil
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SCL	significant contribution limits
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SM80	synthetic minor facility with emissions greater than or equal to 80% of a major source threshold
SO ₂	sulfur dioxide
SO _x	sulfur oxides
SSM	startup, shutdown, and malfunction
tADP	tons of air dried pulp
T/yr	tons per consecutive 12-calendar month period
T2	Tier II operating permit
Tier I	Tier I operating permit
TAP	toxic air pollutants
TEQ	toxicity equivalent
T-RACT	Toxic Air Pollutant Reasonably Available Control Technology
TRS	total reduced sulfur
U.S.C.	United States Code
VE	visible emissions
UTM	Universal Transverse Mercator
VOC	volatile organic compounds
yd ³	cubic yards
µg/m ³	micrograms per cubic meter

FACILITY INFORMATION

Description

Clearwater Paper Corporation (Clearwater), Idaho Pulp and Paperboard Division operates a kraft pulp mill in Lewiston, Idaho. The mill produces bleached kraft pulp, which is processed in three different areas. Uncoated and coated paperboard is produced in the paper machine area; market pulp is dried on the pulp dryer in the finishing area; and slurried pulp stock is pumped to the Clearwater Paper Corporation, Consumer Product Division, which is adjacent to the Idaho Pulp and Paperboard Division.

The 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 permitting action affects No.3 and No.4 lime kilns at the Pulp and Paperboard Division. The No. 3 and No.4 lime kilns are used to calcine kraft-process lime mud into lime. The lime mud is concentrated on the pre-coat filters and makeup lime rock may be added. The mud is put into the back end of the lime kiln and fuel is fired into the front end. The calcium carbonate of the mud is converted to calcium oxide. The lime is removed from the front end of the kiln and transported to storage, prior to use in the slaker. Lime is then mixed with the green liquor from the smelt dissolving tanks to regenerate sodium hydroxide and form the white liquor (pulping liquor).

The No. 4 lime kiln is used as a backup unit to the noncondensable gases (NCG) incinerator to control NCGs generated from the pulping digesters and black liquor evaporators. The No. 3 lime kiln is then used as a backup unit to the No.4 lime kiln when both the NCG incinerator and No.4 lime kiln are not available.

Permitting History

A complete permitting history can be found in the statement of basis for the current Tier I operating permit. The following permitting history, taken from the statement of basis for Tier I operating permit issued January 1, 2010, is only for No.3 and No.4 lime kilns that are related to this permitting action.

Permit Type	Permit Number	Issue Date	Expiration Date	Project	Status
PTC	069-00001	12/06/73	N/A	#1 Recovery, #4 Kiln, Digester, Stock Washer	A
AIR PERMIT	1140-0001	08/22/84	08/21/89	Air Pollution Source Permit	E
AIR PERMIT	13-1140-0001-001 (19 pg.)	07/05/79	N/A	SIP Air Pollution Source Permit	A
AIR PERMIT	1140-0001	10/29/86	08/21/89	Air Pollution Source Permit Mod - Kilns	S
PTC	069-00001	02/26/02	N/A	#3 & #4 Lime Kilns	S
PTC	069-00001	05/31/02	N/A	#3 & #4 Lime Kilns	S
PTC	069-00001	06/24/02	N/A	#3 & #4 Lime Kilns	S
T1	069-00001	12/17/02	12/17/07	Initial Tier I permit	S
PTC	069-00001	02/27/03	N/A	Lime Kilns, incorporates PTC issued 6/24/02	A (will be S after the issuance of this permit)
T1	T1-050216	02/21/07	12/17/07	Replaces T1 permit issued 12/17/02	S

Permit Type	Permit Number	Issue Date	Expiration Date	Project	Status
T1	T1-2007.0057	08/27/07	N/A	Replaces T1-050217 issued 2/21/07 (permit transferred to Clearwater on 12/23/08)	S
T1	T1-2007.0106	1/1/1010	1/1/2015	Tier I renewal	A

Application Scope

This permitting action is for the following changes:

- Revise monitoring, recordkeeping, and reporting requirements for No.3 and No.4 lime kilns.
- Remove No. 2 lime kiln permit section because No.2 lime kiln has been removed from the facility.
- Remove particulate matter (PM) emissions limit taken from IDAPA 58.01.01.822.

The revised PTC will be incorporated into the facility's Tier I operating permit in accordance with IDAPA 58.01.01.209.05.c.

Application Chronology

May 6, 2011	DEQ received an application.
May 9, 2011	DEQ received an application fee.
May 29, 2011	DEQ determined that the application was complete.
June 10, 2011	DEQ made available the draft permit and statement of basis for peer and regional office review.
June 20, 2011	DEQ made available the draft permit and statement of basis for applicant review.
October 13, 2011	DEQ made available the 2 nd draft permit and statement of basis for applicant review.
November 16, 2011	DEQ received the processing fee.
November 25 – January 10, 2011	DEQ provided a public comment period on the proposed action. EPA and affected states were notified.
February 2, 2012	DEQ issued the final permit.

TECHNICAL ANALYSIS

Emissions Units and Control Devices

Table 1 EMISSIONS UNIT AND CONTROL DEVICE INFORMATION

ID No.	Source Description	Control Equipment Description	Emissions Point ID No. and Description
511	<u>No.3 lime kiln</u> Manufacturer: Allis Chambers Model: NA Burner Model: ND Manufacture Date: 1958 Last modified date: 2002 Heat input rating: 105 MMBtu/hr Max. production: 10.5 CaO T/hr Fuel: natural gas, oil, and coke-fired	<u>Electrostatic precipitator</u> Manufacturer: Environmental Elements Corp Model: ND PM ₁₀ control efficiency: 99.99% with all three fields energized and 99.978% with two fields energized	Exit height: 154 ft (46.9 m) Exit diameter: 3.7 ft (1.13 m) Exit flow rate: 850 acfs Exit temperature: 376 °F (191 °C)
512	<u>Emissions Unit Name:</u> Manufacturer: Allis Chambers Model: ND Burner Model: ND Manufacture Date: 1975 – ordered Last modified date: 2002 Heat input rating: 90 MMBtu/hr Max. production: 10.5 CaO T/hr Fuel: natural gas, oil, and coke-fired	<u>Electrostatic precipitator</u> Manufacturer: Environmental Elements Corp. Model: ND PM ₁₀ control efficiency: 99.99% with all three fields energized and 99.978% with two fields energized <u>Packed-bed scrubber</u> Manufacturer: Amerex Industries Model: ND Type: caustic packed bed Pressure drop: 3.0 inch of water Wet scrubber flow: 880 gpm SO ₂ control efficiency: 95% and a maximum outlet SO ₂ concentration of 20 ppmv	Exit height: 154 ft (46.9 m) Exit diameter: 3.7 ft (1.13 m) Exit flow rate: 850 acfs Exit temperature: 376 °F (191 °C)

Emissions Inventories

Emissions inventory was not submitted for this application because this permitting action is for revising the monitoring, recordkeeping, and reporting requirements. There is no physical or operational change that causes emissions increase as a result of this permitting action. A complete EI was provided in the Statement of basis for the Tier I operating permit, issued January 1, 2010, and is listed as follows:

Table 2 Clearwater Paper Corporation Potential to Emit Summary

Source	PM ₁₀ (T/yr)	SO ₂ (T/yr)	CO (T/yr)	NOx (T/yr)	VOC (T/yr)	TRS (T/yr)	Maximum Individual HAP (T/yr)
Sawdust Handling	1.2				1.33		
Sawdust Cyclone	16.1						
Chip Handling	1.97				3.1		
Sawdust Brownstock Washers					24.5	1.1	28 ¹
O ₂ Reactor			74.5 *		44.7	1.3	17 ²

Source	PM ₁₀ (T/yr)	SO ₂ (T/yr)	CO (T/yr)	NO _x (T/yr)	VOC (T/yr)	TRS (T/yr)	Maximum Individual HAP (T/yr)
NCG Incinerator	6.95	20 *	6	12.9	2.2	0.05	2.2 ¹
Sawdust Fiberline Bleach			90.2		4.6	0.2	11 ¹
Chip Fiberline Bleach			220.9		11.2	0.4	26 ¹
Lurgi 134 ClO ₂ Synthesis				2.9			2.3 ³
Lurgi 234 ClO ₂ Synthesis				5.5			2.3 ³
Lurgi Scrubber							1.1 ⁴
No. 3 Lime Kiln	17.3 *	21 *	44 *	113 *	1.1	12.6 *	0.6 ⁵
No. 4 Lime Kiln	17.3 *	15 *	44	113	1.1	12.6	0.6 ⁵
Lime Slaker	7.53 *						
Lime Handling Baghouse	4.13						
No. 1 Power Boiler	12.4	1	135.0	225.6	8.2		2.7 ⁶
No. 2 Power Boiler	100.8	1328	120.7	193.6	7.4	0.01	2.5 ⁶
No. 3 Power Boiler	8.8	0.7	96.6	161.4	5.9		2.0 ⁶
No. 4 Power Boiler	120	100	4741.7	842	156.07		15 ⁷
No. 1 Package Boiler	8.84	071	96.6	161.4	5.9		2.0 ⁶
No. 2 Package Boiler	11.04	0.88	120.68	201.62	7.36		2.5 ⁶
Temporary Boiler 1&2	0.53	0.04	5.9	9.8	0.35		1.2 ⁶
No. 4 Recovery Furnace	96.39	28.9	158.8	196.9	11.8	31.5	7.2 ³
No. 5 Recovery Furnace	181.1	490 *	3850 *	700 *	36.2	96.6	3.1 ⁶
No. 4 Smelt Tank	28.56	0.66	1.05	2.63	1.31	4.33	1.4 ¹
No. 5 Smelt Tank	49	2.0	3.2	8.1	4.0	13.3	4.4 ¹
No. 4 Salt Cake	2.0 *						
No. 5 Salt Cake	5.1 *						
Wastewater Treatment					241.7	52.1	230 ¹
Dry Fuel Bin	28.2						
Hog Fuel (transfer & pile)	2.5						
No. 1 Paper Machine					4.2		5.3 ⁹
No. 2 Paper Machine					4.6		5.8 ⁹
Pulp Dryer	3.76				7.53	0.75	7.5 ¹
Pulp Dryer Gas Fired	1.3	0.1	13.7	16.3	0.83		0.28 ⁶
Road Fugitives	107.1						
Total – Pulp and Paper Div.	790.6	1533.3	5855.0	2153.6	595.8	213.9	
Total – Consumer Products Div.	30.3	0.24	33.5	30.2	9.4	NA	

Source	PM ₁₀ (T/yr)	SO ₂ (T/yr)	CO (T/yr)	NO _x (T/yr)	VOC (T/yr)	TRS (T/yr)	Maximum Individual HAP (T/yr)
Facility Total	820.9	1533.5	5888.5	2183.8	606.5	213.9	229.9 ¹

1) Methanol 2) o-Cresol 3) HCl 4) Chlorine 5) Naphthalene 6) Hexane 7) Benzene 8) Formaldehyde 9) Acetaldehyde

* Emission limits from underlying permits

Ambient Air Quality Impact Analyses

Ambient air quality impact analyses are not required because this permitting action is for revising the monitoring, recording, and reporting requirements. There is no physical or operational change that causes emissions increase as a result of this permitting action.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Nez Perce County, which is designated as attainment or unclassifiable for PM_{2.5}, PM₁₀, SO₂, NO₂, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201

Permit to Construct (PTC) Required

The permittee has requested to modify the monitoring, recordkeeping, and reporting requirements for the Nos. 3 & 4 lime kilns in the PTC, issued February 27, 2003. The revised PTC is issued in accordance with IDAPA 58.01.01.220. This permitting action is processed in accordance with IDAPA 58.01.01.209.05.c.

Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401

Tier II Operating Permit

The applicant did not apply for a Tier II operating permit. IDAPA 58.01.01.401 does not apply to this permitting action.

Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

IDAPA 58.01.01.301

Requirement to Obtain Tier I Operating Permit

This facility has a potential to emit greater than 100 tons per year for PM₁₀, SO₂, NO_x, CO, VOC, and TRS, 10 tons per year for any one HAP, and 25 tons per year for all HAPs combined as demonstrated previously in the Emissions Inventories Section of this analysis. Therefore, this facility is classified as a major facility, as defined in IDAPA 58.01.01.008.10, and subject to Title V program. The facility has a current Tier I operating permit, issued January 1, 2010.

PSD Classification (40 CFR 52.21)

40 CFR 52.21 Prevention of Significant Deterioration of Air Quality

The facility is classified as a PSD existing major stationary source because the estimated emissions of PM₁₀, SO₂, NO_x, CO, VOC, and TRS have the potential to exceed major stationary source thresholds (i.e., 100 T/yr for a designated facility). The facility is a designated facility (i.e., Pulp and Paper Mills) as defined in 40 CFR 52.21(b)(1)(i)(a).

This permitting action is for revising the monitoring, recordkeeping, and reporting requirements. There is no physical or operational change that causes emissions increase as a result of this permitting action. Therefore, it is not a PSD modification as defined in 40 CFR 52.21 and is not subject to PSD permitting.

NSPS Applicability (40 CFR 60)

The facility's NSPS applicability determinations can be found in the Statement of Basis for the Tier I operating permit, issued January 1, 2010. This permitting action does not alter the facility's NSPS applicability determinations.

The facility is subject to the following NSPS subparts:

- 40 CFR 60 Subpart D
- 40 CFR 60 Subpart Dc
- 40 CFR 60 Subpart BB

NESHAP Applicability (40 CFR 61)

The facility is not subject to any NESHAP requirements in 40 CFR 61.

NESHAP Applicability (40 CFR 63)

Applicability determinations for 40 CFR 63 can be found in the Statement of Basis for the current Tier I operating permit, issued January 1, 2010. This permitting action does not alter the facility's applicability determinations for 40 CFR 63 Subparts.

The facility is subject to the following NESHAP subparts:

- 40 CFR 63 Subpart S
- 40 CFR 63 Subpart MM
- 40 CFR 63 Subpart JJJJ
- 40 CFR 63 Subpart ZZZZ

Compliance Assurance Monitoring (CAM) - 40 CFR 64

This permitting action does not alter the facility's CAM applicability determinations discussed in the Statement of Basis for the Tier I operating permit, issued January 1, 2010. No.4 lime kiln appears to be subject to CAM for SO₂ emissions. Clearwater needs to make an applicability determination and submit an application to amend Tier I if applicable.

Permit Conditions Review

This section describes the permit conditions that have been added, revised, modified or deleted as a result of this permitting action. New text is in **bold**. The deleted text is in ~~struck-out~~.

This section also discusses why some permit conditions that are requested to be removed by the applicant are kept.

PERMIT TO CONSTRUCT SCOPE

Permit to Construct Scope section is taken from the current PTC template and added to the revised PTC. Permit to Construct Scope section describes the purpose of this permitting action, identifies the to-be-replaced PTC, and lists emissions units regulated by the revised PTC.

LIME KILN NO.3

Following the current PTC template; a process description of No.3 lime kiln and its emissions control are added to the revised PTC, and all old bracket citations in the right margin of the permit conditions are removed.

Permit Conditions 1.1 and 6.1

Following the internal guidance on establishing permit conditions, **“In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.”** is added to the footnote of Table 3 and Table 5 of the revised PTC.

“3-hour block” is added to the footnote of Table 3 and Table 5.

SO₂ emission rate limits in lb/3-hr means pounds per 3-hour “block”. The SO₂ emission rate limits are for complying with the 3-hr SO₂ NAAQS. We use 3-hour block in the modeling analysis to demonstrate compliance with the 3-hour SO₂ NAAQS.

In the comments on the 1st draft permit, Clearwater requested assistance on identifying regulatory basis for some emissions limits in PCs 1.1 and 6.1. The following are the findings:

The 2/26/2002 PTC was for removing the old scrubbers and installing the ESPs and a scrubber in series for No.4 lime kiln to address opacity violations in accordance with a consent order.

The SO₂ would increase as a result of removing old scrubbers. To avoid trigger PSD for the project, SO₂ limits were established to ensure that SO₂ emissions increase was less than SO₂ significant level.

Installing ESPs and removing old scrubbers were for resolving past VE violations. However, this physical change debottlenecked the operating constraints of the kilns and resulted in an increase in maximum production capacity of the lime kilns. To separating the enforcement action from production increase with PSD complications, the 1/30/2001 consent order required the 2/26/2002 PTC to limit NO_x emissions to the current actual rates.

It was stated in the technical memorandum for the 2/26/2002 PTC that “5.2 lb/hr (PM/PM₁₀ emissions rate) was for effectively keeping the net emissions increase of the modification to levels below those defined as significant and associated applicability levels for PSD.” It is not clear how the conclusion was obtained.

The 2/27/2003 PTC was for increasing No.3 & No. 4 lime kilns production rates.

In the 2/27/2003 PTC, PM, PM₁₀ and NO_x annual emissions were increased to the current permitted rates to ensure that the emissions increases were less than their significant levels to avoid PSD. Modeling was conducted for the 2/26/2002 PTC at the production rates permitted in the 2/27/2003 PTC. It demonstrated compliance with the NAAQS. The emissions rates used as modeling input were estimated based on the operation proposed in the application and permitted in the 2/27/2003 PTC.

TRS annual limit was revised from 1.45 T/yr to 12.6 T/yr to resolve and settle the contested case according to the information provided in the SOB for the 2/27/2003 PTC.

Permit Conditions 1.2 and 6.2

The permit conditions were found originally in the 8/22/1984 air pollution source permit. They have been carried over to the PTCs issued afterwards. The limits were established in the 2/27/2003 PTC under the authority of IDAPA 58.01.01.211 according to the citation in the 2/27/2003 permit.

Though the kilns are not subject to TRS standard of 8 ppm, based on a dry basis corrected to 10% O₂ on a daily basis 12-hour average in 40 CFR 60 Subpart BB (§§60.283), the monitoring data from 1/1/2011 to 8/24/2011 provided in the comments on the 1st draft permit show that the highest TRS daily average was 3.3 ppm, based on a dry basis corrected to 10% O₂, for both kilns.

Permit Conditions 1.3 and 6.3

No.3 lime kiln was constructed in 1952 and modified in 1964. According to IDAPA 58.01.01.625, because it was operating prior to January 24, 1969, No.3 lime kiln is exempt from the 20% opacity limit but subject to a less stringent opacity limit (i.e., 40%). The 25% opacity limit for No.3 lime kiln and 20% opacity limit for No.4 lime kiln appeared, for the first time, in the 8/22/1984 air permit. No specific monitoring methods were specified in the 8/22/1984 permit. The limits have been carried over to the subsequent kiln PTCs since then.

The monitoring method in IDAPA 58.01.01.625.04 and continuous opacity monitoring system (COMS) were, for the first time, added into the 2/26/2002 PTC when ESPs were installed to replace the scrubbers to address the past visible emissions (VE) violations.

Clearwater commented on the 1st draft that “a COMS is not capable of determining compliance with the IDAPA opacity standard...” As discussed in October 17, 2005 letter from Mike Simon to Sue Somers, DEQ views the opacity readings generated by a COMS as credible evidence for compliance determinations of the opacity limit. The letter is included in Appendix C of the SOB. Using COM to determine opacity compliance in Permit Conditions 1.3 and 6.3 is not removed.

A typo in PC 1.3 is corrected. It reads:

“1.3 Opacity Limit

Emissions from the No. 3 lime kiln stack shall not exceed 25% opacity 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 ~~3-83.6~~ and by the procedures contained in IDAPA 58.01.01.625.04.”

Permit Conditions 1.4 and 6.5

As of September 2011, DEQ is going through the rulemaking process to remove requirements in IDAPA 58.01.01.815 through 826 for kraft pulping mills that are either obsolete or covered by existing federal rules. In the comments on the 1st draft permit, Clearwater requested to remove PCs 1.4 and 6.5 because the requirements in these PCs are removed in the proposed Rules for kraft pulping mills.

The PM emissions limits in PCs 1.4 and 6.5 are less stringent than the PM emissions limit in 40 CFR 63 Subpart MM and the limits in Permit Condition 1.1. The 5.2 lb/hr emissions limit in the permit is equivalent to 0.15 lb/air-dried kraft pulp according to the information in the technical analysis for the 2/26/2002 PTC.

Old Permit Conditions 1.4 and 6.5 are removed. However, the requirement is still an applicable requirement for Tier I until it is removed at adjournment of 2012 legislative session if adopted by the Idaho Legislature (i.e., around April 2012).

The rulemaking information can be found at DEQ’s website at <http://www.deq.idaho.gov/laws,-rules,-etc/deq-rulemakings/docket-no-58-0101-1003-pending-rule.aspx>.

~~1.4 Production Based Emission Limit~~

~~Particulate matter emissions from the No. 3 lime kiln stack shall not exceed one pound per ton of equivalent air dried kraft pulp (lb PM/tADP).~~

Permit Conditions 2.1 and 7.1

The short term production rate limits in PCs 2.1 and 7.1 are not removed.

Clearwater submitted the following comments during the public comment period:

Clearwater requested that the short term production limits be removed because they are unnecessary to demonstrate compliance with emissions limits and the limits may constrain lime kiln operation. While the Department observed that the throughput values were reflected in the short term emission rates used for modeling, compliance with the short term emissions limits is determined by stack testing or continuous emission monitoring. The throughput limits are unnecessary to demonstrate compliance and serve no other environmental benefit. Clearwater once again requests that the short term production limits be removed in improve flexibility in the per Clearwater requested that the short term production limits be removed because they are unnecessary to demonstrate compliance with emissions limits and the limits may constrain lime kiln operation. While the Department observed that the throughput values were reflected in the short term emission rates used for

modeling, compliance with the short term emissions limits is determined by stack testing or continuous emission monitoring. The throughput limits are unnecessary to demonstrate compliance and serve no other environmental benefit. Clearwater once again requests that the short term production limits be removed in improve flexibility in the permit.

DEQ is not able to make above changes at this time because Clearwater did not provide analyses on how removing the existing permit limits impacts the emissions from the entire facility (e.g., does the change debottleneck the production of the facility?) The above request was not part of the original application and is beyond the scope of this permitting action.

Permit Conditions 2.2 and 7.2

In the comments on the 1st draft permit, Clearwater stated that the regulatory basis for PCs 2.2 and 7.2 could not be determined. DEQ staff reviewed the past permitting information. Here are the findings:

Installing ESPs and removing old scrubbers were for resolving past VE violations. However, this physical change debottlenecked the operating constraints of the kilns and resulted in an increase in maximum production capacity of the lime kilns. To separating enforcement action from production increase with PSD complications, the 1/30/2001 consent order required the 2/26/2002 PTC to limit kilns production to kilns' existing production levels. The existing maximum throughput levels for No.3 lime kiln at that time was 9.6 T/hr, based on 12-hour average, and 126,217 tons per any consecutive 12-month period for the two kilns combined.

In the 2/27/2003 PTC, Clearwater requested to increase lime kilns production levels. 175,200 T/yr throughput limit for the two kilns combined was established to avoid PSD. At this production rate, the NO_x, PM, and PM₁₀ emissions increases were below the significant levels for PSD. The hourly throughput has increased to 10.5 T/hr, based on a 12-hour average for each lime kiln. The modeling for the 2/27/2003 PTC was not required because the modeling for the 2/26/2002 PTC was based on 175,200 T/yr of CaO for the two kilns combined and 240 T/day of CaO for each kiln.

Permit Conditions 2.3, 3.5, 4.4, 7.3, 8.6, and 9.4

Clearwater requested to remove PCs 2.3, 3.5, 4.4, 7.3, 8.6, and 9.4 in the 2/27/2003 PTC regarding the prioritization of noncondensable gases (NCG) treatment work practice and the related monitoring and reporting requirements. Clearwater stated in its PTC application, received May 6, 2011, that "...these requirements are unnecessary due to the enforceable emission limits that are in place for TRS and SO₂ from the lime kilns..."

These NCG treatment work practice were originally permitted in the 2/26/2002 PTC and kept the same in the 2/27/2003 PTC. It was developed under the authority of IDAPA 58.01.01.211. Changing the NCG treatment work practice is a change of the method of operation. Clearwater did not provide an analysis on whether the proposed change would cause emissions increase. DEQ does not have the information to support the requested changes. The PCs 2.3, 3.5, 4.4, 7.3, 8.6, and 9.4 are kept as they were in the 2/27/2003 PTC.

Permit Conditions 2.3.2 and 7.3.2

As of September 2011, DEQ is going through the rulemaking process to remove requirements in IDAPA 58.01.01.815 through 826 for kraft pulping mills that are either obsolete or covered by existing federal rules.

In the comments on the 1st draft permit, Clearwater requested to revise PCs 2.3.2 and 8.3.2 to reflect the changes in the proposed Rules for kraft pulping mills.

Changes are made to PCs 2.3.2 and 7.3.2. PC 2.3.2 reads as follows:

"2.3.2 Effectiveness of NCG Treatment

... in compliance with applicable provisions of 40 CFR 60, Subpart BB **and** 40 CFR 63, Subpart S; ~~and IDAPA~~

58.01.01.815 through 826.

During the public comment period, Clearwater requested to remove PCs 2.3.2 and 7.3.2. Besides that the request was not part of the original application and is beyond the scope of this permitting action, the follow are the other reasons:

Based on the information in the technical memorandum for the 2/26/2002 PTC, when non-condensable gases (NCGs) were routed from the incinerator to the lime kilns, uncontrolled NCGs were often vented to the atmosphere for a short period until operations could stabilize. In addition, Clearwater only operates the scrubber when NCGs are routed through the No.4 lime kiln. To minimize excess emissions of NCGs caused by venting uncontrolled NCGs to the atmosphere when routing NCGs from the incinerator to the lime kilns and to minimize SO₂ emissions caused by not timely bringing the scrubber on line, Permit Conditions 2.3.2 and 7.3.2 requires: *“When NCGs are routed to the No. 3 (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...”* Whether or not excess emissions of NCGs are violations would be affected by many factors, such as 40 CFR 63.443, Odor Rules in Tier I operating permit, etc.

Permit Conditions 2.4 and 7.4

Compliance Assurance Monitoring (CAM) was developed in the Tier I issued 1/1/2010. The CAM plan requests Clearwater to use opacity monitored by COMS as an indicator and to conduct periodic source testing to demonstrate compliance with PM and PM₁₀ emissions limits. With CAM plan in the Tier I and a startup, shutdown, and malfunction (SSM) plan that is required by 40 CFR 63 Subpart MM, the revised PTC does not impose specific requirements on operating parameters for the ESPs. PC 2.4 is revised and read as follows:

“2.4 Control Equipment

~~The permittee shall install, maintain, and operate in accordance with manufacturer specifications, an ESP on the No. 3 Lime Kiln stack to control emissions of PM from the No. 3 Lime Kiln.~~

The permittee shall operate an ESP on the No. 3 lime kiln stack to control emissions of PM from the No. 3 lime kiln. The permittee shall install and maintain the ESP in accordance with manufacturer specifications.”

In the comments on the 1st draft permit, Clearwater stated that the PM limit was adequately protective, and there was no regulatory basis for this requirement.

According to the information available at DEQ, installing ESPs was for an enforcement action to address past VE violations. The original control devices were scrubbers until ESPs were required in the 2/26/2002 PTC. PCs 2.4 and 7.4 were developed, in the 2/26/2002 PTC, based on the consent order and under the authority of IDAPA 58.01.01.211. PCs 2.4 and 7.4 are not removed.

Old Permit Conditions 2.5 and 7.5.1

In the comments on the 1st draft permit, Potlatch requested to remove old PCs 2.5 and 7.5.1 because CAM plan in Tier I requires Clearwater to use opacity monitored by COMS as an indicator not the ESP operating parameters.

Old PCs 2.5 and 7.5.1 were originally developed in the 2/26/2002 PTC. CAM was not required at that time. With CAM in Tier I, old PCs 2.5 and 7.5.1 are obsolete and removed.

2.5 Reserved Monitoring Equipment

~~The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, equipment to continuously measure the voltage and amperage applied by each T/R set to the discharge electrodes and each ESP field.~~

Old Permit Conditions 2.7, 2.8, 3.2, 7.8, and 8.2

Clearwater requested to remove old PC 2.7 in the 2/27/2003 PTC regarding O&M manual requirements for the ESP. Clearwater also requested to remove old PCs 2.8, 3.2, 7.8, and 8.2 in the 2/27/2003 PTC regarding operating ranges of ESP's voltage and amperage and the related monitoring and recordkeeping requirements. These PCs are removed with the following justifications:

Old PCs 2.7, 2.8, 3.2, 7.8, and 8.2 were initially developed in the 2/26/2002 PTC for ensuring compliance with the PM/PM₁₀ emission rate limits and the opacity limits for No.3 and No.4 lime kilns. CAM was not required in 2002. With DEQ's approved CAM plan, the periodic source testing requirement in Permit Condition 10.13 of the Tier I, issued January 1, 2010, and the monitoring requirements in 40 CFR 63 Subpart MM, DEQ staff agree that these PCs can be removed.

The following are the discussions on the CAM plan and the monitoring requirements in 40 CFR 63 Subpart MM.

At the Tier I renewal, Clearwater was required to address CAM for the kilns in according to 40 CFR 64. DEQ approved Clearwater's CAM plan with the supporting information provided by Clearwater regarding the correlations between the opacity and the PM/PM₁₀ emissions rate for No.3 and No.4 kilns.

The CAM plan uses an opacity reading of less than 20%, monitored by COMS, as a reasonable assurance for compliance with lb/hr PM/PM₁₀ emissions limits for kilns. In addition, in Permit Condition 10.13 of Tier I, issued January 1, 2010, Clearwater is required to periodically perform source testing to demonstrate compliance with the PM/PM₁₀ emission rate limits and to continually monitor and record the correlations between the opacity and PM/PM₁₀ emissions rates.

In 40 CFR 63 Subpart MM, Clearwater is required to use opacity as a monitoring method to demonstrate compliance with the PM grain loading standard (0.064 gr/dscf @10% O₂).

According to 40 CFR 64.3(d), *(1) If a continuous emission monitoring system (CEMS), continuous opacity monitoring system (COMS) or predictive emission monitoring system (PEMS) is required pursuant to other authority under the Act or state or local law, the owner or operator shall use such system to satisfy the requirements of 40 CFR 64. (2) The use of a CEMS, COMS, or PEMS that satisfies any of the following monitoring requirements shall be deemed to satisfy the general design criteria in 40 CFR 64.3(d), provided that a COMS may be subject to the criteria for establishing indicator ranges under paragraph (a) of this section.:*

(i) Section 51.214 and appendix P of part 51 of this chapter;

(ii) Section 60.13 and appendix B of part 60 of this chapter;

(iii) Section 63.8 and any applicable performance specifications required pursuant to the applicable subpart of part 63 of this chapter;

(iv) Part 75 of this chapter;

(v) Subpart H and appendix IX of part 266 of this chapter; or

(vi) If an applicable requirement does not otherwise require compliance with the requirements listed in the preceding paragraphs (d)(2)(i) through (v) of this section, comparable requirements and specifications established by the permitting authority.

No.3 and No.4 lime kilns at Clearwater are subject to 40 CFR 63 Subpart MM, and COM is the required monitoring method to demonstrate compliance with grain loading standard in the Subpart; therefore, the COMS satisfies 40 CFR 64.3(d)(2)(iii).

With DEQ's approved CAM plan in the Tier I, issued January 1, 2010, the periodic source testing requirement in Permit Condition 10.13 of the Tier I, issued January 1, 2010, and the COMS monitoring requirements in 40 CFR 63 Subpart MM; DEQ has removed the requirements in PCs 2.7, 2.8, 3.2, 7.8 and 8.2 of the 2/27/2003 PTC. The PCs are now labeled as "Reserved."

Reserving permit condition numbers is for avoiding re-numbering all the rest of the permit conditions and changing the referencing permit numbers in existing permit conditions. The PCs 2.7 and 2.8 read as follows:

“2.7 **Reserved Operations and Maintenance Manual Requirements**

~~Within 180 days after issuance of this permit, the permittee shall develop an O&M manual for the ESP, which describes the procedures that will be followed to comply with General Provision 2 of this permit and the ESP manufacturer operating specifications and requirements. The O&M manual shall remain on site at all times and shall be made available to Department representatives upon request.~~

2.8 **Reserved ESP Voltage and Amperage**

~~The voltage and amperage applied by 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 on site at all times and shall be made available to Department representatives upon request.~~

[HDAPA 58.01.01.211, 5/1/94]

Permit Conditions 3.1 and 8.1

The initial testing requirements were fulfilled on July 16, 2002 for No.3 lime kiln and July 18, 2002 for No.4 lime kiln following issuance of the 2002 permit. The initial performance testing requirements are removed from the revised PCs 3.1 and 8.1.

“3.1 **Periodic Performance Testing for PM and PM₁₀**

...

~~The initial performance test using Method 202 shall be used to gather emissions data on PM₁₀. This data may be used to modify the allowable PM₁₀ emissions rate limit in Table 3 through a permit modification request if necessary. If the PM or PM₁₀ measured in the most recent performance test is less than or equal to 75% of any respective particulate standard listed in Permit Condition 1.1, the permittee shall conduct periodic performance tests every three calendar years...~~

Permit Condition 3.2

Refer to discussions under Old Permit Conditions 2.7, 2.8, 3.2, 7.8, and 8.2. PC 3.2 reads as follows:

3.2 **Reserved ESP Voltage and Amperage**

~~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 manufacturer and O&M manual units of measure. A compilation of the most recent two years of amperage and voltage records shall be kept on site and shall be made available to Department representatives upon request.~~

Permit Conditions 3.3, 3.4, 8.4, and 8.5

Clearwater stated in the comments on the 1st draft permit that “The regulatory basis for this condition is not known. The CERMS system complies with App F and PS 6 which ensures continuous measurement accuracy of SO₂, NO_x and TRS.”

Monitoring hourly throughput of CaO, based on a 12-hour average, and annual throughput, based on a 12-month rolling average, was developed in the 2/26/2002 PTC and was for complying with the throughput limits in Permit Conditions 2.1 and 2.2.

Monitoring the hourly throughput of CaO, based on a 3-hour average and 24-hour average, and the fuel-use rate, based on a 3-hour average, was developed in the 2/27/2003 PTC for determining exhaust gas flow rates as required in PC 3.11. The averaging time periods consistent with the SO₂ limit in lb/3-hr and NO_x limit in lb/day. According to the information in the comments on the 2nd draft permit, Clearwater does not use continuous monitoring system to measure exhaust gas volume in the stack as part of the continuous emission rate monitoring system (CERMS) to determine mass emissions rates. Instead, mass emissions rates are determined using calculated exhaust gas flow rates in dscfm and concentrations measured by CEMS in ppm_{dv}. Exhaust gas flow rates are calculated using measured CaO production rates, fuel-use rates, and oxygen percentages in the exhaust gas. The mass emissions rates are reported in terms of the emission standard by the data acquisition system. PCs 3.3, 3.4, 8.4 and 8.5 are used for demonstrating compliance with production limits or emissions limits and

cannot be removed.

Permit Conditions 3.3, 3.5, 8.4, and 8.6

“A compilation of the most recent two years of records shall be kept on site and shall be made available to Department representatives upon request” is removed from PCs 3.3, 3.5, 8.4, and 8.6 because Clearwater is subject to General Provision 9 of the PTC that requires Clearwater to keep records for five years.

3.3 Throughput Monitoring

... ~~A compilation of the most recent two years of records shall be kept on site and shall be made available to Department representatives upon request.~~”

3.5 Treatment of NCGs

... ~~A compilation of the most recent two years of records shall be kept on site and shall be made available to Department representatives upon request.~~”

Permit Conditions 3.5 and 8.6

Clearwater requested to remove PCs 2.3, 3.5, 4.4, 7.3, 8.6, and 9.4 in the PTC, issued February 27, 2003, regarding the prioritization of noncondensable gases (NCG) treatment work practice. Clearwater stated in its PTC application, received May 6, 2011, that “...these requirements are unnecessary due to the enforceable emission limits that are in place for TRS and SO₂ from the lime kilns...”

In the comments on the 1st draft permit, Clearwater stated that “There is no regulatory basis for this condition. Combustion in a Lime Kiln meets MACT, SO₂ is continuously monitored.”

PCs 3.5 and 8.6 were originally in the 2/26/2002 PTC. They were the monitoring requirements for compliance with Permit Conditions 2.3 and 7.3 regarding NCGs treatment work practice and developed under the authority of IDAPA 58.01.01.211. PCs 3.5 and 8.5 are not removed. The justification and discussions can be found under Permit Conditions 2.3, 3.5, 4.4, 7.3, 8.6, and 9.4.

Permit Conditions 3.6 and 8.7

In the comments on the 1st draft permit, Clearwater commented that we might want to cite 40 CFR part 63 subpart MM for the COMS requirement.

This PC was originally in the 2/26/2002 PTC and developed under the authority of IDAPA 58.01.01.211. COMS is also required for lime kilns equipped with ESPs in 40 CFR 63 Subpart MM (i.e., 40 CFR 63.864(d)). The requirements in 40 CFR 63 Subpart MM are included in the Tier I Section 5.

Permit Conditions 3.7, 3.8, 3.11, 3.12, 8.8, 8.9, 8.12, and 8.13

PCs 3.7, 3.8, 8.8 and 8.9 were in 2/26/2002 and 2/27/2003 PTCs. They were developed to demonstrate compliance with NO_x and SO₂ emissions limits in Permit Condition 1.1 and 6.1 under the authority of IDAPA 58.01.01.211.

In the comments on the 1st draft permit, Clearwater requested to revise PCs 3.7, 3.8, 8.8, and 8.9 and to remove PCs 3.11, 3.12, 8.12, and 8.13. According to the information in the comments on the 2nd draft permit, Clearwater does not use continuous monitoring system to measure exhaust gas volume in the stack as part of the CERMS to determining mass emissions rates. Instead, mass emissions rates are determined using calculated exhaust gas flow rates in dscfm and concentrations measured by CEMS in ppmdv. Exhaust gas flow rates are calculated using measured CaO production rates, fuel-use rates, and oxygen percentages in the exhaust gas. The mass emissions rates are reported in terms of the emission standard by the data acquisition system. PCs 3.11, 3.12, 8.12 and 8.13 describe how the emissions rates are determined and are kept in the PTC. PCs 3.7, 3.8, 8.8, and 8.9 are not revised.

Permit Conditions 3.10 and 8.11

In the comments on the 1st draft permit, Clearwater requested to remove PCs 3.10 and 8.11. Because the monitored O₂ concentration is used for demonstrating compliance with TRS ppm corrected to 10% O₂ in PCs 1.2 and 6.2 and for exhaust gas flow rate determination in PCs 3.11 and 8.12, the PCs 3.10 and 8.11 are not removed.

Clearwater requested to remove "temperature" in Permit Conditions 3.10 and 8.11 in the 2/27/2003 PTC regarding stacks temperature monitoring of No.3 and No.4 kilns. Clearwater stated in its PTC application, received May 6, 2011, that "...There is no basis for this requirement."

During the public comment period, Clearwater provided additional information regarding temperature. It makes sense. "Temperature" is removed from PCs 3.10 and 8.11.

"Clearwater requested in its application that "temperature" be removed from this monitoring requirement. The temperature of the exhaust gases from the lime kiln stacks does not relate in any way to the operation of the CEMS which is used to demonstrate compliance. Temperature monitoring is not needed for compliance or operational purposes. The 2003 permit may have required temperature monitoring to provide data to convert act to dscf so the mass rate of emissions could be calculated. Subsequently, the monitoring requirement was changed from an in stack flow monitor to an engineering calculation making the stack temperature no longer relevant. Monitoring temperature now is burdensome on Clearwater without any environmental or regulatory basis. Please delete this parameter from these conditions, as requested in the application."

The PC 3.10 reads as follows:

“3.10 Monitoring of Stack Parameters

The permittee shall continuously monitor and record the ~~temperature and~~ O₂ concentration of the exhaust gases from the No. 3 lime kiln emission stack. The CEMS shall provide O₂ concentrations on a dry basis.

Permit Conditions 3.11, 3.12, 8.12, and 8.13

Refer to discussions under Permit Conditions 3.7, 3.8, 3.11, 3.12, 8.8, 8.9, 8.12, and 8.13.

Permit Conditions 4.1 and 9.1

In the comments on the 1st draft permit, Clearwater requested to remove PCs 4.1 and 9.1 and stated there was no regulatory requirement for it.

PCs 4.1 and 9.1 are not removed. PCs 4.1 and 9.1 were originally developed in the 2/26/2002 PTC under the authority of IDAPA 58.01.01.211. With CAM plan using opacity as an indicator combined with periodic source testing, it is important to get an approved source test protocol because the test results would be used to verify the correlations between opacity and PM/PM₁₀ emissions limits and to ensure the CAM for kilns is still valid.

Old Permit Conditions 4.2 and 9.2

In the comments on the 1st draft permit, Clearwater requested to remove old PCs 4.2 and 9.2 because they duplicate the requirements in General Provision 8 of the PTC. Old PCs 4.2 and 9.2 are removed.

4.2 — Performance Test Report

~~The permittee shall submit a report of the results of the performance tests required in Permit Condition 3.1, including all required process data, to the Department within 30 days after the date on which the performance test is concluded.~~

Permit Conditions 4.3 and 9.3

In the comments on the 1st draft permit, Clearwater requested to remove PCs 4.3 and 9.3 and stated that excess emissions reports were already requested in MACT and General Provision 10 of the PTC.

PCs 4.3 and 9.3 are not removed. The permit conditions were in the 2/26/2002 PTC. They were for reporting NO_x, SO₂, and TRS emissions and developed under the authority of IDAPA 58.01.01.211.

MACT does not have requirements on NO_x, SO₂, and TRS emissions for kilns. General Provision 10 is for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns. These requirements are different from the requirements in PCs 4.3 and 9.3.

PCs 4.3 and 9.3 are changed to reflect that the Kilns are not subject to Subpart BB. Duplicated requirements in PCs 4.3 and 9.3 are removed. The semiannual CEMS report requirements are kept in PCs 4.3 and 9.3.

Clearwater has a Tier I. Tier I General Provision 24 requires semiannual monitoring reports. The reports in PCs 4.3 and 9.3 may serve the reporting purpose in Tier I for NO_x, SO₂, and TRS emissions limits of the lime kilns.

It is reasonable to specify the emission rate report in PCs 4.3 and 9.3 because the NO_x and SO₂ emissions limits were established in the 2/27/2003 PTC to avoid PSD permitting, the NO_x, SO₂, and TRS emissions rates are calculated using CEM data and the exhaust gas flow rates, and the exhaust gas flow rates vary with the parameters listed in PCs 3.11 and 8.12.

The revised PC 4.3 reads as follows:

4.3 Semiannual CEMS Report

The permittee shall submit a semiannual CEMS report to the Department that contains, but is not limited to, the following:

~~4.3.1~~ cCalculated or measured emissions rates for all applicable averaging periods for NO_x, SO₂, and TRS. Emissions rates shall be calculated using CEMS data and calculated stack flow measurements as required in Permit Conditions 3.11 and 3.12. These records may be provided in electronic format.

~~4.3.2~~ All applicable reporting requirements of 40 CFR 60, Subpart BB. These records may be provided in electronic format.

~~4.3.3~~ Identification of any monitoring results that indicate an exceedance of applicable requirements of this permit; 40 CFR 60, Subpart BB; 40 CFR 63, Subpart S; or IDAPA 58.01.01.

Permit Conditions 4.4 and 9.4

Clearwater requested to remove PCs 2.3, 3.5, 4.4, 7.3, 8.6, and 9.4 in the PTC, issued February 27, 2003, regarding the prioritization of noncondensable gases (NCG) treatment work practice. Clearwater stated in its PTC application, received May 6, 2011, that "...these requirements are unnecessary due to the enforceable emission limits that are in place for TRS and SO₂ from the lime kilns..."

In the comments on the 1st draft permit, Clearwater stated that "There is no regulatory basis for this requirement. NCG treatment is address by 40 CFR Part 63 rules and PTC P-060209 revised May 25, 2007."

PC 4.4 is not removed. PC 4.4 was originally in the 2/26/2002 PTC. It was the reporting requirement for compliance with PC 3.5 and developed under the authority of IDAPA 58.01.01.211. Refer to Permit Conditions 2.3, 3.5, 4.4, 7.3, 8.6, and 9.4 for more discussions.

PC 4.4 is revised to remove the last sentence because it is included in the Tier I (i.e., either in the specific sections for NSPS, MACT or in the general provision section.)

"4.4 Treatment of NCGs

The permittee shall submit to the Department a semiannual report providing the results from monitoring required by Permit Condition 3.5. 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. ~~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."~~

Permit Conditions 4.5 and 9.5

Clearwater requested to remove PCs 4.5 and 9.5 regarding semiannual reporting of the kilns' throughput data.

The requirements in PCs 4.5 and 9.5 are removed. The reporting requirements in PCs 4.5 and 9.5 are redundant because PTC General Provision 9 requires Clearwater to keep monitoring data on site and make them available on DEQ's request. In addition, because Clearwater is a Tier I source, it is subject to Facility-wide Permit Condition 1.11 regarding monitoring and Tier I General Provision 24 that requires Clearwater to submit reports of any required monitoring at least every six months.

Permit Conditions 4.5 and 9.5 are now labeled as "Reserved". Reserving permit condition numbers is for avoiding re-numbering all the rest of the permit conditions and changing the referencing permit numbers in existing permit conditions. PC 4.5 reads as follows:

4.5 ~~Throughput Reporting~~

~~The permittee shall submit a semiannual report to the Department that contains the data and results of throughput monitoring required by Permit Condition 3.3. These records may be provided in electronic format~~ **Reserved.**

Permit Conditions 4.6 and 9.6

In the comments on the 1st draft permit, Clearwater requested to removed PCs 4.6 and 9.6 because they duplicate PTC General Provision 11. PCs 4.6 and 9.6 are removed.

4.6 ~~Certification of Documents~~

~~All documents submitted to the Department, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, 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.~~

Old Permit Conditions 5.1 and 10.1

Clearwater requested DEQ to revise PCs 5.1 and 10.1 in the comments provided during the public comment period. They are now removed for the following reasons:

The 6/24/2002 PTC required Clearwater to replace the old scrubbers on No.3 and No.4 lime kilns with the ESPs and a scrubber in series for No.4 lime kiln to resolve visible emission violations. Permit Conditions 5.1 and 10.1 in the 6/24/2002 PTC waived Clearwater's compliance obligation on the requirements associated with the old scrubbers in Permit No. 1140-0001-255 (pages 16 and 16a) issued on October 29, 1986 during the process of replacing the old scrubbers with the ESPs and the new scrubber. Permit Conditions 5.1 and 10.1 are obsolete permit conditions, but was carried over to the 2/27/2003 PTC. They are now removed from the revised PTC.

5.1 **Reserved** ~~Existing Permits~~

~~The emission limits, operating requirements, monitoring and recordkeeping requirements, and reporting requirements of this PTC replace, from the date of issuance of this permit forward, all requirements specified for the No. 3 lime kiln with its associated venturi scrubber in Permit No. 1140-0001-255 (pages 16 and 16a), issued October 29, 1986.~~

LIME KILN NO.4

Following the current PTC template; a process description of No.4 lime kiln and its emissions control are added to the revised PTC, and all old bracket citations in the right margin of the permit conditions are removed.

Permit Condition 6.1

Refer to discussions under Permit Conditions 1.1 and 6.1.

Permit Condition 6.2

Refer to discussions under Permit Conditions 1.2 and 6.2.

Permit Condition 6.3

Refer to discussions under Permit Conditions 1.3 and 6.3.

Permit Condition 6.5

Refer to discussions under Permit Conditions 1.4 and 6.5.

~~6.5 — Production-based Emission Limit~~

~~Particulate matter emissions from the No. 4 Lime kiln stack shall not exceed 1.0 lb PM/tADP.~~

Permit Condition 7.1

Refer to discussions under Permit Conditions 2.1 and 7.1

Permit Condition 7.2

Refer to discussions under Permit Conditions 2.2 and 7.2.

Permit Conditions 7.3

Refer to discussions under Permit Conditions 2.3, 3.5, 4.4, 7.3, 8.6, and 9.4.

Permit Condition 7.3.2

Changes are made to PC 7.3.2. Refer to discussions under Permit Conditions 2.3.2 and 7.3.2.

“7.3.2 Effectiveness of NCG Treatment

... in compliance with applicable provisions of 40 CFR 60, Subpart BB and 40 CFR 63, Subpart S; and IDAPA 58.01.01.815 through 826.

Permit Condition 7.4

In the comments on the 1st draft permit, Clearwater stated that the PM limit was adequately protective, and there was no regulatory basis for this requirement.

According to the information available at DEQ, installing ESPs and a scrubber in series for No.4 lime kiln was for an enforcement action to address past VE violations. The original control devices were scrubbers until ESPs and a scrubber were required in the 2/26/2002 PTC. PCs 2.4 and 7.4, in the 2/26/2002 PTC, were developed based on the consent order and under the authority of IDAPA 58.01.01.211. PCs 2.4 and 7.4 are not removed.

PC 7.4 is revised to not impose specific operating requirements for the ESP and the scrubber. It is because of the following reasons:

- CAM was developed in the Tier I issued 1/1/2010. The CAM plan requires Clearwater to use opacity, monitored by COMS, as an indicator and to conduct periodic source testing to demonstrate compliance with PM and PM₁₀ emissions limits. With CAM plan in the Tier I and a SSM plan that is required by 40 CFR 63 Subpart MM, the revised PTC does not impose specific operating requirements for the ESP.

- Permit Condition 8.9 Sulfur Dioxide CEMS and Permit Condition 8.10 Total Reduced Sulfur CEMS are modified to add requirement of 40 CFR 60.13 using the authority of IDAPA 58.01.01.211. By meeting requirements of 40 CFR 60.13 and 40 CFR 60 Appendix B, SO₂ CEMS and TRS CEMS meet CAM requirements for CEMS in accordance with 40 CFR 64.3(d). By using the same logic used for CAM, with these CEMSs, the PTC will not impose specific operating requirements for the scrubber. Refer to Old Permit Condition 8.3 for more discussions.

“7.4 Control Equipment

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

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

Old Permit Condition 7.5 Including 7.5.1 and 7.5.2

Old PC 7.5 is removed. Refer to the discussions under Old Permit Conditions 2.5 and 7.5.1

Clearwater requested to remove Permit Condition 7.5.2 in the PTC, issued February 27, 2003, regarding installing monitoring devices to monitor scrubber operating parameters for No.4 lime kiln scrubber. Clearwater stated in its PTC application, received May 6, 2011, that “...*Scrubber parameter monitoring is unnecessary given the TRS and SO₂ CEMS operated on both Kilns...*”

As discussed under Permit Condition 7.4, Permit Condition 8.9 Sulfur Dioxide CEMS and Permit Condition 8.10 Total Reduced Sulfur CEMS are modified to add requirement of 40 CFR 60.13. By meeting requirements of 40 CFR 60.13 and 40 CFR 60 Appendix B, SO₂ CEMS and TRS CEMS meet CAM requirements for CEMS in accordance with 40 CFR 64.3(d). With these CEMSs, using the same logic in CAM, the revised PTC will not impose specific operating requirements for the scrubber. Old PC 7.5 is removed.

7.5 **Reserved Monitoring Equipment**

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

~~7.5.1 ESP Parameters~~

~~Monitoring equipment to continuously measure the voltage and amperage applied by each T/R set to the discharge electrodes and each ESP field.~~

~~7.5.2 Scrubber Parameters~~

~~Monitoring equipment to continuously measure the pH and flow rate of the solution used by the caustic scrubber.~~

Old Permit Condition 7.7

Clearwater requested to remove Permit Conditions 2.7 and 7.7 in the PTC, issued February 27, 2003, regarding O&M manual requirements for the ESPs and the scrubber.

As discussed under Old Permit Conditions 2.7, 2.8, 3.2, 7.8, and 8.2 and Permit Condition 7.4, the revised PTC will not impose specific operating requirements for the ESP and the scrubber. PC 7.7 is removed.

7.7 **Reserved Operations and Maintenance Manual Requirements**

~~Within 180 days after issuance of this permit, the permittee shall develop an O&M manual for the ESP 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.~~

Old Permit Condition 7.8

Refer to discussions under Old Permit Conditions 2.7, 2.8, 3.2, 7.8, and 8.2.

7.8 ~~Reserved ESP Voltage and Amperage~~

~~The voltage and amperage applied by 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 on site at all times and shall be made available to Department representatives upon request.~~

[HDAPA 58.01.01.211, 5/1/94]

Old Permit Condition 7.9

Clearwater requested to remove PC 7.9 regarding the scrubber operation and documentation.

PC 7.9 is removed. Refer to discussions under Old Permit Conditions 7.5 Including 7.5.1 and 7.5.2.

PC 7.9 is now labeled as "Reserved". Reserving permit condition numbers is for avoiding re-numbering all the rest of the permit conditions and changing the referencing permit numbers in existing permit conditions.

"7.9 Scrubber Media Flow Rate, and pH"

~~The permittee shall maintain the scrubber media pH and flow rate within manufacturer and O&M manual specifications. Documentation of the scrubber media pH and flow rate specifications shall remain on site at all times and shall be made available to Department representatives upon request. Reserved"~~

Permit Condition 8.1

Refer to discussions under Permit Conditions 3.1 and 8.1. PC 8.1 is revised and reads as follows:

"8.1 Periodic Performance Testing for PM and PM₁₀

...

~~The initial performance test using Method 202 shall be used to gather emissions data on PM₁₀. This data may be used to modify the allowable PM₁₀ emissions rate limit in Table 3 through a permit modification request if necessary. If the PM or PM₁₀ measured in the most recent performance test is less than or equal to 75% of any respective particulate standard listed in Permit Condition 1.1, the permittee shall conduct periodic performance tests every three calendar years...~~

Old Permit Condition 8.2

Refer to discussions under Old Permit Conditions 2.7, 2.8, 3.2, 7.8, and 8.2.

8.2 — ~~ESP Voltage and Amperage~~

~~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 manufacturer and O&M manual units of measure. A compilation of the most recent two years of amperage and voltage records shall be kept on site and shall be made available to Department representatives upon request. Reserved~~

Old Permit Condition 8.3

Clearwater requested to remove Permit Condition 8.3 in the PTC, issued February 27, 2003. Clearwater stated in its PTC application, received May 6, 2010, that "...Scrubber parameter monitoring is unnecessary given the TRS and SO₂ CEMS operated on both Kilns..."

The requirements in PC 8.3 were initially developed in the PTC, issued February 26, 2002, to ensure proper performance of the scrubber to control SO₂ emissions so that the SO₂ increase of that project is less than significant level to avoid PSD.

Clearwater uses SO₂ CEMS to demonstrate continuous compliance with SO₂ emissions limits for No.4 lime kiln and TRS CEMS to demonstrate compliance with TRS limits.

Applying the same logic as that in CAM, according to 40 CFR 64.3(d), if the SO₂ CEMS and TRS CEMS satisfy the following requirements:

- Section 60.13 and
- Appendix B of 40 CFR 60

Then it deemed satisfying the general design criteria in 40 CFR 64.3(d) (e.g., develop and propose control device operating parameters and ranges.)

Permit Condition 8.9 Sulfur Dioxide CEMS and Permit Condition 8.10 Total Reduced Sulfur CEMS are modified to add requirement of 40 CFR 60.13 using the authority of IDAPA 58.01.01.211. By meeting the requirements of 40 CFR 60.13 and 40 CFR 60 Appendix B, SO₂ CEMS and TRS CEMS meet CAM requirements for CEMS in accordance with 40 CFR 64.3(d). With these CEMSs, the PTC will not impose specific operating requirements for the scrubber. PC 8.3 is removed.

8.3 ~~Reserved Scrubber Media Flow Rate and pH~~

~~The permittee shall monitor and record the scrubber media flow rate and pH hourly when the scrubber is in operation. A compilation of the most recent two years of records shall be kept on site and shall be made available to Department representatives upon request.~~

The Tier I operating permit, issued January 1, 2010, does not have CAM plan for SO₂. It is not clear why CAM applicability for SO₂ was not discussed in the Tier I renewal application. Clearwater may need to look into this.

Permit Condition 8.4

Refer to discussions under Permit Conditions 3.3, 3.4, 8.4, and 8.5.

Permit Conditions 8.4 and 8.6

Refer to discussions under Permit Conditions 3.3, 3.5, 8.4, and 8.6

“8.4 Throughput Monitoring

~~... A compilation of the most recent two years of records shall be kept on site and shall be made available to Department representatives upon request.”~~

“8.6 Treatment of NCGs

~~... A compilation of the most recent two years of records shall be kept on site and shall be made available to Department representatives upon request.”~~

Permit Condition 8.5

Refer to discussions under Permit Conditions 3.3, 3.4, 8.4, and 8.5.

Permit Condition 8.6

Refer to discussions under Permit Conditions 3.5 and 8.6.

Permit Condition 8.7

Refer to discussions under Permit Conditions 3.6 and 8.7.

Permit Conditions 8.8 and 8.9

The PCs 8.8 and 8.9 were in the 2/26/2002 and 2/27/2003 PTCs. They were developed to demonstrate compliance with NO_x and SO₂ emissions limits in Permit Condition 6.1 under the authority of IDAPA 58.01.01.211.

The PCs 8.8 and 8.9 are kept as they were in the 2/27/2003 PTC. Refer to discussions under Permit Conditions 3.7, 3.8, 3.11, 3.12, 8.8, 8.9, 8.12, and 8.13 for details.

In addition, as discussed under Permit Condition 7.4 and Old Permit Condition 8.3, to not to monitor operating parameters of the ESP and scrubber, the permittee is required to meet the monitoring requirements in 40 CFR 60.13 and Appendix B in 40 CFR 60 for SO₂ CEMS. PC 8.8 is revised and reads as follows:

“8.9 Sulfur Dioxide CEMS

...The permittee shall meet the monitoring requirements in 40 CFR 60.13 and 40 CFR 60 Appendix B for SO₂ CEMS.”

Permit Condition 8.10

To remove the requirements regarding the scrubber operating parameters monitoring, PC 8.9 Sulfur Dioxide CEMS and PC 8.10 Total Reduced Sulfur CEMS are modified to add the requirement of 40 CFR 60.13 using the authority of IDAPA 58.01.01.211. By meeting the requirements of 40 CFR 60.13 and 40 CFR 60 Appendix B, SO₂ and TRS CEMS meet CAM requirements for CEMS in accordance with 40 CFR 64.3(d). Apply the same logic used for CAM, with these CEMSs, the revised PTC will not impose specific operating requirements for the scrubber.

“8.10 Total Reduced Sulfur CEMS

...The permittee shall meet the monitoring requirements in 40 CFR 60.13 and 40 CFR 60 Appendix B for TRS CEMS.”

Permit Condition 8.11

Refer to discussions under Permit Conditions 3.10 and 8.11. The PC 8.11 reads as follows:

“8.11 Monitoring of Stack Parameters

The permittee shall continuously monitor and record the ~~temperature and~~ O₂ concentration of the exhaust gases from the No. 4 Lime kiln stack. The CEMS shall provide O₂ concentrations on a dry basis.

Permit Conditions 8.12 and 8.13

Refer to discussions under Permit Conditions 3.7, 3.8, 3.11, 3.12, 8.8, 8.9, 8.12, and 8.13.

Permit Condition 9.1

Refer to discussions under Permit Conditions 4.1 and 9.1.

Old Permit Condition 9.2

Refer to discussions under Old Permit Conditions 4.2 and 9.2.

9.2 — Performance Test Report

~~The permittee shall submit a report of the results of the performance tests required in Permit Condition 8.1, including all required process data, to the Department within 30 days after the date on which the performance test is concluded.~~

Permit Condition 9.3

PC 9.3 is revised. Refer to discussions under Permit Conditions 4.3 and 9.3.

9.3 Semiannual CEMS Report

The permittee shall submit a semiannual CEMS report to the Department that contains, but is not limited to, the following:

~~9.3.1—Calculated or measured emissions rates for all applicable averaging periods for NO_x, SO₂, and TRS. Emissions rates shall be calculated using CEMS data and calculated stack flow measurements as required in Permit Conditions 8.14 and 8.15. These records may be provided in electronic format.~~

~~9.3.2—All applicable reporting requirements of 40 CFR 60, Subpart BB. These records may be provided in electronic format.~~

~~9.3.3—Identification of any monitoring results that indicate an exceedance of applicable requirements of this permit; 40 CFR 60, Subpart BB; 40 CFR 63, Subpart S; or IDAPA 58.01.01.~~

Permit Condition 9.4

The PC 9.4 is not removed but revised. Refer to discussions under Permit Conditions 4.4 and 9.4.

“9.4 Treatment of NCGs

The permittee shall submit to the Department a semiannual report providing the monitoring results from monitoring required by Permit Condition 8.6. 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. 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.”~~

Permit Condition 9.5

Clearwater requested to remove Permit Conditions 4.5 and 9.5 regarding semiannual reporting of lime kilns throughput data.

Permit Condition 9.5 is removed. Refer to discussions under Permit Conditions 4.5 and 9.5.

~~9.5—Throughput Reporting~~

~~The permittee shall submit a semiannual report to the Department that contains the data and results of throughput monitoring required by Permit Condition 8.4. These records may be provided in electronic format.”~~

Permit Condition 9.6

Refer to discussions under Permit Conditions 4.6 and 9.6.

~~9.6—Certification of Documents~~

~~All documents submitted to the Department, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, 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.~~

Old Permit Condition 10.1

Clearwater requested DEQ to revise PCs 5.1 and 10.1 in the comments provided during the public comment period. The permit conditions are obsolete and removed. Refer to discussions under Old Permit Conditions 5.1 and 10.1 for details.

REGULATORY COMPLIANCE

10.1 Reserved Existing Permits

~~The emission limits, operating requirements, monitoring and recordkeeping requirements, and reporting requirements of this PTC replace, from the date of issuance of this permit forward, all requirements specified for the No. 4 Lime kiln with its associated Venturi scrubber in Permit No. 1140-0001-260 (pages 17 and 17a), issued October 29, 1986.~~

Old Permit Section for No.2 Lim Kiln

Because No.2 lime kiln has been removed from the facility as stated in Clearwater's comments on the 1st draft permit, No.2 lime kiln permit section in the existing permit has been removed.

General Provisions

General Provisions section is replaced with the one taken from the current PTC template.

Miscellaneous

Clearwater has requested to correct typo in PC 10.25 in Tier I operating permit, issued January 1, 2010, referring particulate standard instead of CO standard. The correction will be made to the amended Tier I.

PUBLIC REVIEW

Public Comment Period

A public comment period was made available to the public in accordance with IDAPA 58.01.01.209.05.c. Affected states and EPA were notified. During this time, comments were submitted in response to DEQ's proposed action. Refer to the chronology for public comment period dates.

A response to public comments document has been crafted by DEQ based on comments submitted during the public comment period. That document is part of the final permit package for this permitting action.

APPENDIX A – FACILITY DRAFT COMMENTS

Comments on the 1st draft permit received on July 29, 2011 and the 2nd draft received on October 20, 2011 are discussed and addressed under Permit Conditions Review section.

APPENDIX B - PROCESSING FEE

According to IDAPA 58.01.01.225, the PTC processing fee for this permitting action is \$1,000.

PTC Fee Calculation

Instructions:

Fill in the following information and answer the following questions with a Y or N. Enter the emissions increases and decreases for each pollutant in the table.

N Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N

Y Did this permit require engineering analysis? Y/N

N Is this a PSD permit Y/N (IDAPA 58.01.01.205.04)

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO _x	0.0	0	0.0
SO ₂	0.0	0	0.0
CO	0.0	0	0.0
PM ₁₀	0.0	0	0.0
VOC	0.0	0	0.0
TAPS/HAPS	0.0	0	0.0
Total:	0.0	0	0.0
Fee Due	\$ 1,000.00		

APPENDIX C - OCTOBER 17, 2005 LETTER REGARDING COMS



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

RECEIVED
OCT 19 2005
By _____

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

Dirk Kempthorne, Governor
Toni Hardesty, Director

October 17, 2005

Certified Mail No. 7005 0390 0003 2967 8434

Sue Somers, Environmental Manager
Potlatch Corporation
Idaho Pulp and Paperboard Division
P.O. Box 1126
Lewiston, ID 83501-1126

Re: Facility ID No. 069-00001, Potlatch Corporation – Idaho Pulp & Paperboard Division,
Lewiston, Using Continuous Opacity Monitor Data to Determine Compliance

Dear Ms. Somers:

In a January 19, 2005 letter, Potlatch Corporation - Pulp & Paperboard Division (Potlatch) requested a determination from the Department of Environmental Quality concerning the appropriate method for determining the Power Boiler No. 4's compliance with the Idaho opacity standard and the New Source Performance Standard (NSPS) opacity standard.

Potlatch operates a Continuous Opacity Monitoring System (COMS) on the Power Boiler No. 4 stack. The operation of the COMS is required by the NSPS as stated at 40 CFR part 60, subpart Da, Standards of Performance for Electrical Utility Steam Generating Units for Which Construction Commenced After September 18, 1978, and Potlatch's December 17, 2002 Tier I Operating Permit, Permit Condition 3.6.

The NSPS (40 CFR 60.42a (b)) and Potlatch's Tier I operating permit (Permit Condition 3.2) limits the opacity of emissions from the Power Boiler No. 4. Potlatch cannot discharge to the atmosphere any gases which exhibit greater than 20% opacity (six-minute average), except for one six-minute period per hour of not more than 27%.

The NSPS requires that the data acquisition system for the COMS analyze and record the opacity at least every 10 seconds. The data acquisition system for the COMS must also complete at least one cycle of sampling and analyzing for each successive six-minute period.

In addition, Permit Condition 1.7 requires Potlatch to comply with the visible emissions standard in IDAPA 58.01.01.625 which states, "A person shall not discharge any air pollutant into 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 this section."

wrong see 60.13 (e)(1)

record every 6 minutes

To determine compliance with this the opacity standard, IDAPA 58.01.01.625.04 requires the use of EPA Method 9. However, violations of this standard are determined by counting the number of readings (readings are taken every 15 seconds) in excess of 20% and dividing this number by four to find the number of minutes in excess of the percent opacity limitation.

Additionally, IDAPA 58.01.01.625.04.c clarifies that sources subject to New Source Performance Standards must calculate opacity as detailed in IDAPA 58.01.01.625.04 and as specified in 40 CFR Part 60.

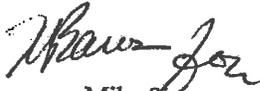
DEQ views the opacity readings generated by a COMS as credible evidence for compliance determinations with the IDAPA 58.01.01.625 visible emission standards. In order to demonstrate compliance with this standard from the COMS data, Potlatch shall count the number of readings (readings taken every 10 seconds) in excess of 20% and dividing this number by six to find the number of minutes in excess of the percent opacity limitation. If any three minute period in any 60-minute period exceeds 20%, DEQ will view this as an exceedance of the opacity standard in IDAPA 58.01.01.625.

Any exceedance of either the NSPS or state opacity standard should be reported in accordance with the excess emission requirements of Potlatch's permit (1.9 through 1.9.5 and IDAPA 58.01.01.130-136), the NSPS excess emission reporting requirements, Semiannual Monitoring Reports (General Provision 24) and Annual Compliance Certifications (General Provision 21).

Additionally, please be aware that the results of a Method 9 visible emission observation take precedence over COMS data for determining compliance with the NSPS requirement (40 CFR 60.11 (e)(5)) and for purposes of demonstrating compliance with the states visible emissions requirements (IDAPA 58.01.01.625.04).

If you have any questions, please call me at (208) 373-0469.

Sincerely,



Mike Simon
Stationary Source Program Manager
Air Quality Division

G:\Air Quality\Stationary Source\SS Ltd\Enforcement\Potlatch\Potlatch COMs data calculation letter.doc

c: Hudson Mann, Lewiston Regional Office
Dan Pitman, Stationary Source Program
Mike Simon, Stationary Source Manager
Eileen Loerch, Compliance and Enforcement Coordinator
Phyllis Heitman, Policy Binder
Source File

Reading File