



February 29, 2024

Mr. Wayne Wooster, Environmental & Sustainability Manager
North Pacific Paper Company, LLC
3001 Industrial Way
Longview, WA 98632

Subject: Final Air Discharge Permit for Increase in RFP Line Production Limits

Dear Mr. Wooster:

The public comment period for the preliminary determination to issue Air Discharge Permit 24-3625 (ADP 24-3625) in response to ADP Application CO-1088 concluded on February 24, 2024. The Southwest Clean Air Agency (SWCAA) did not receive any adverse comments from the public relative to the preliminary determination. Therefore, a final determination to issue ADP 24-3625 has been made pursuant to Section 400-110(4) of SWCAA's General Regulations for Air Pollution Sources. Electronic copies of ADP 24-3625 and the associated Technical Support Document are available for public review in the permit section of SWCAA's internet home page (<http://www.swcleanair.gov/permits/adpfinal.asp>). Original copies are enclosed for your files.

This Air Discharge Permit may be appealed directly to the Pollution Control Hearings Board (PCHB) within 30 days of receipt as provided in RCW 43.21B.

If you have any comments, or desire additional information, please contact me or Wess Safford at (360) 574-3058, extension 126.

Sincerely,

Uri Papish
Executive Director

UP:wls

Enclosure – Air Discharge Permit 24-3625 and Technical Support Document





SWCAA
Southwest Clean Air Agency

**AIR DISCHARGE PERMIT
24-3625**

Issued: February 29, 2024

North Pacific Paper Company
3001 Industrial Way, Longview, WA 98632

SWCAA ID - 712

REVIEWED BY:


Clinton Lamoreaux, Chief Engineer



APPROVED BY:


Uri Papish, Executive Director

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1. Equipment/Activity Identification

ID No.	Equipment/Activity	Control Measure/Equipment
1	Recovered Fiber Pulping Line	Low VOC Process Additives

2. Approval Conditions

The following tables detail the specific requirements of this permit. In addition to the requirements listed below, equipment at this facility may be subject to other federal, state, and local regulations. The permit requirement number is identified in the left-hand column. The text of the permit requirement is contained in the middle column. The emission unit, equipment, or activity to which the permit requirement applies is listed in the right-hand column.

ADP 24-3625 supersedes ADP 21-3452 in its entirety.

Emission Limits

Emission Limits		Equipment/ Activity ID No.																
Req. No.	Emission Limits																	
1.	<p>Combined emissions from operation of the Recovered Fiber Pulping Line must not exceed the following:</p> <table><tr><th><u>Pollutant</u></th><th><u>Emission Limit</u></th></tr><tr><td>VOC (lb-compound)</td><td>4.56 tpy</td></tr><tr><td>Acetaldehyde</td><td>616.1 lb/yr</td></tr><tr><td>Biphenyl</td><td>200.2 lb/yr</td></tr><tr><td>Chloroform</td><td>26.5 lb/yr</td></tr><tr><td>Formaldehyde</td><td>73.3 lb/yr</td></tr><tr><td>Methylene Chloride</td><td>123.7 lb/yr</td></tr><tr><td>Propionaldehyde</td><td>75.9 lb/yr</td></tr></table> <p>Emissions must be calculated using emission factors from Section 6 of the Technical Support Document for this Permit and actual pulp throughput.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	VOC (lb-compound)	4.56 tpy	Acetaldehyde	616.1 lb/yr	Biphenyl	200.2 lb/yr	Chloroform	26.5 lb/yr	Formaldehyde	73.3 lb/yr	Methylene Chloride	123.7 lb/yr	Propionaldehyde	75.9 lb/yr	1
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2.	Visible emissions from approved equipment must not exceed 0% opacity for more than 3 minutes in any one-hour period as determined by a Certified Observer certified in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).	1																

Operating Limits and Requirements

Req. No.	Operating Limits and Requirements	Equipment/Activity ID No.
3.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
4.	The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facility-wide

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
5.	Each pollution control device/measure must be in use whenever the associated production equipment is in operation. Control devices must be operated and maintained in accordance with the manufacturer's specifications and operated in a manner that minimizes emissions.	1
6.	Emission units identified in this Permit must be maintained and operated in total and continuous conformity with the conditions identified in this Permit. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this Permit, including directing the facility to cease operations until corrective action can be completed.	1
7.	Drum Pulper throughput must not exceed 1,837 air dried tons of pulp (ADTP) per day and 531,075 ADTP per year.	1

Monitoring and Recordkeeping Requirements

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
8.	All air quality related complaints, including odor complaints, received by the permittee and the results of any subsequent investigation or corrective action must be recorded for each occurrence.	Facility-wide
9.	With the exception of data logged by a computerized data acquisition system, each record required by this Permit must include the date and the name of the person making the record entry. If a control device or process is not operating during a specific time period, a record must be made to that effect.	1
10.	All records required by this Permit must be kept for a minimum period of no less than five years and must be maintained in a form readily available for inspection by SWCAA representatives.	1
11.	Excess emissions and upset conditions must be recorded for each occurrence.	1
12.	The permittee must monitor and record the following information for the recovered fiber pulping line: (a) Pulping line pulp production Recorded Monthly (b) Hours of pulping line operation Recorded Monthly (c) Maintenance and repair activities Recorded for each occurrence	1

Emission Monitoring and Testing Requirements

There are no emission monitoring or testing requirements for the approved equipment cited in this ADP.

Reporting Requirements

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
13.	<p>All air quality related complaints received by the permittee must be reported to SWCAA within three days of receipt. Complaint reports must include the following information:</p> <ul style="list-style-type: none"> (a) Date and time of the complaint; (b) Name of the complainant; (c) Nature of the complaint; and (d) Description of corrective action taken in response to complaint (if any). 	Facility-wide
14.	<p>The permittee must notify SWCAA at least seven days in advance of the use of any new material, which results in the emission of toxic or hazardous air pollutants listed in Section 6 of the Technical Support Document for this Permit. In response to the notification, SWCAA may require that a written report be submitted with the following:</p> <ul style="list-style-type: none"> (a) A description of the proposed change(s) in materials with an MSDS for each new material, (b) The date the change(s) is (are) to be made, (c) The change(s) in emissions of VOCs, HAPs and TAPs occurring as a result of the change, and (d) A summary of any applicable requirement(s) that would apply as a result of the change(s). <p>If the proposed emission rate of a new TAP exceeds the applicable SQER and/or other emission limits established by this Permit or otherwise circumvents an applicable requirement, New Source Review may be required prior to making the proposed change.</p>	Facility-wide
15.	<p>An annual emissions inventory report must be submitted in accordance with SWCAA 400-105(1). In addition to the emissions information required under SWCAA 400-105(1), each annual report must include an estimate of annual emission quantities for each TAP compound listed in the Technical Support Document for this Permit.</p>	1
16.	<p>Excess emissions must be reported to SWCAA as follows:</p> <ul style="list-style-type: none"> (a) As soon as possible, but no later than 12 hours after discovery for emissions that represent a potential threat to human health or safety; (b) As soon as possible, but no later than 48 hours after discovery for emissions which the permittee wishes to claim as unavoidable pursuant to SWCAA 400-107; and (c) No later than 30 days after the end of the month of discovery for all other excess emissions. 	1
17.	<p>The following emission-related information must be reported to SWCAA no later than March 15th for the previous calendar year:</p> <ul style="list-style-type: none"> (a) Total pulping line pulp production; (b) Total pulping line hours of operation; and (c) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs). 	1

3. General Provisions

Req. No.	General Provisions
A.	For the purpose of ensuring compliance with this ADP, duly authorized representatives of the Southwest Clean Air Agency must be permitted access to the Permittee's premises and the facilities being constructed, owned, operated and/or maintained by the Permittee for the purpose of inspecting said facilities. These inspections are required to determine the status of compliance with this ADP and applicable regulations and to perform or require such tests as may be deemed necessary.
B.	The provisions, terms, and conditions of this ADP bind the Permittee, its officers, directors, agents, servants, employees, successors and assigns, and all persons, firms, and corporations acting under or for the Permittee.
C.	The requirements of this ADP survive any transfer of ownership of the source or any portion thereof.
D.	This ADP must be posted conspicuously at or be readily available near the source.
E.	This ADP will be invalidated, in whole or in part, if construction or installation of any new or modified equipment has not commenced within eighteen (18) months from date of issuance, if construction is discontinued for a period of eighteen (18) months or more without prior SWCAA approval, or if construction is not completed within a reasonable time.
F.	This ADP does not supersede requirements of other Agencies with jurisdiction and further, this ADP does not relieve the Permittee of any requirements of any other governmental Agency. In addition to this ADP, the Permittee may be required to obtain permits or approvals from other agencies with jurisdiction.
G.	Compliance with the terms of this ADP does not relieve the Permittee from the responsibility of compliance with SWCAA General Regulations for Air Pollution Sources, previously issued Regulatory Orders, RCW 70A.15, Title 173 WAC or any other applicable emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply.
H.	If any provision of this ADP is held to be invalid, all unaffected provisions of the ADP will remain in effect and be enforceable.
I.	No change in this ADP will be made or be effective except as may be specifically set forth by written order of the Southwest Clean Air Agency upon written application by the Permittee for the relief sought.
J.	The Southwest Clean Air Agency may, in accordance with RCW 70A.15, impose such conditions as are reasonably necessary to assure the maintenance of compliance with the terms of this ADP, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act.