



TECHNICAL SUPPORT DOCUMENT

**Air Discharge Permit ADP 24-3625
Air Discharge Permit Application CO-1088**

Issued: February 29, 2024

North Pacific Paper Company

SWCAA ID - 712

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ABBREVIATIONS

List of Acronyms

ADP	Air Discharge Permit	PSD	Prevention of Significant Deterioration
AP-42	Compilation of Emission Factors, AP-42, 5th Edition, Volume 1, Stationary Point and Area Sources – published by EPA	RACT	Reasonably Available Control Technology
ASIL	Acceptable Source Impact Level	RCW	Revised Code of Washington
BACT	Best available control technology	SCC	Source Classification Code
CAS#	Chemical Abstracts Service registry number	SDS	Safety Data Sheet
CFR	Code of Federal Regulations	SQER	Small Quantity Emission Rate listed in WAC 173-460
EPA	U.S. Environmental Protection Agency	Standard	Standard conditions at a temperature of 68°F (20°C) and a pressure of 29.92 in Hg (760 mm Hg)
mfr	Manufacturer	SWCAA	Southwest Clean Air Agency
NESHAP	National Emission Standards for Hazardous Air Pollutants	T-BACT	Best Available Control Technology for toxic air pollutants
NOV	Notice of Violation/	WAC	Washington Administrative Code
NSPS	New Source Performance Standard		

List of Units and Measures

µg/m ³	Micrograms per cubic meter	ppmv	Parts per million by volume
acfm	Actual cubic foot per minute	ppmvd	Parts per million by volume, dry
ADTP	Air dried ton, pulp	ppmw	Parts per million by weight
dscfm	Dry Standard cubic foot per minute	scfm	Standard cubic foot per minute
gr/dscf	Grain per dry standard cubic foot	tph	Ton per hour
MMBtu	Million British thermal unit	tpy	Tons per year
ppm	Parts per million		

List of Chemical Symbols, Formulas, and Pollutants

CO	Carbon monoxide	PM ₁₀	PM with an aerodynamic diameter 10 µm or less
CO ₂	Carbon dioxide	PM _{2.5}	PM with an aerodynamic diameter 2.5 µm or less
CO _{2e}	Carbon dioxide equivalent	SO ₂	Sulfur dioxide
HAP	Hazardous air pollutant listed pursuant to Section 112 of the Federal Clean Air Act	TAP	Toxic air pollutant pursuant to Chapter 173-460 WAC
NO ₂	Nitrogen dioxide	VOC	Volatile organic compound
NO _x	Nitrogen oxides		
O ₂	Oxygen		
PM	Particulate Matter with an aerodynamic diameter 100 µm or less		

Terms not otherwise defined have the meaning assigned to them in the referenced regulations or the dictionary definition, as appropriate.

1. FACILITY IDENTIFICATION

Applicant Name:	North Pacific Paper Company, LLC
Applicant Address:	3001 Industrial Way, Longview, WA 98632
Facility Name:	North Pacific Paper Company
Facility Address:	3001 Industrial Way, Longview, WA 98632
SWCAA Identification:	712
Contact Person:	Wayne Wooster, Environmental & Sustainability Manager
Primary Process:	Pulp and Paper Manufacturing
SIC/NAICS Code:	2621 / Paper Mills 322122 / Newsprint Mills
Facility Classification:	Title V (Criteria/HAP)

2. FACILITY DESCRIPTION

North Pacific Paper Company, LLC (NORPAC) operates a pulp and paper manufacturing facility in Longview Washington that includes a thermomechanical pulp mill (TMP), a deink pulp mill, a recovered fiber pulp (RFP) line, and a paper mill. This permitting action applies to the Recovered Fiber Pulping Line.

3. CURRENT PERMITTING ACTION

This permitting action is in response to Air Discharge Permit application number CO-1088 (ADP Application CO-1088) dated November 22, 2023. North Pacific Paper Company submitted ADP Application CO-1088 requesting approval of the following:

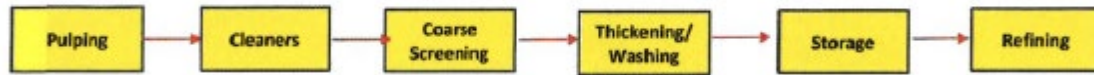
- Increase maximum daily pulp production in the RFP line from 1,454 ADTP/dy to 1,837 ADTP/dy; and
- Replace the existing 60.6 ADTP hourly production limit with a 1,837 ADTP daily production limit.

The current permitting action modifies existing pulp production limits as proposed in ADP Application CO-1088. The NORPAC facility is subject to the Air Operating Permit program. The facility currently operates under the terms of AOP SW18-22-R0-A. Upon completion of this permitting action, requirements of the resulting air discharge permit are expected to be incorporated into AOP SW18-22-R0-A.

ADP 24-3625 will supersede ADP 21-3452 in its entirety.

4. PROCESS DESCRIPTION

- 4.a. Recovered Fiber Pulping (existing). Old, corrugated cardboard (OCC) and mixed paper (MP) material streams are received at the facility via truck and railcar and stored in warehouses prior to processing. Stored material is processed into recovered fiber pulp using a single FibreFlow drum pulper. Finished pulp is stored in a storage tower adjacent to the paper mill. The recovered fiber pulping line includes cleaners, deckers, a dump tower, screens, chests, and thickeners operating in support of the drum pulper. Recovered fiber pulp will be used to manufacture packaging grade paper in existing paper machines.



Pulping line process flow diagram.

- 4.b. Process Heat (existing). The DAF filtrate water stream on the fiber pulping line requires process heat to maintain a working temperature of 105 °F to 130 °F. NORPAC uses process steam from the main facility to heat the water stream.

5. EQUIPMENT/ACTIVITY IDENTIFICATION

- 5.a. Recovered Fiber Pulping Line (modified). Equipment associated with the RFP line include the drum pulper, DAF (dissolved air floatation) system, dump chest, deckers, and sludge tank. Emissions released from the drum pulper and associated equipment are discharged through round, gooseneck vents or from the surface of the DAF system's open vat. Pulping line equipment is not equipped with forced ventilation, and the volumetric flow rate of exhaust depends on activity level within each piece of equipment. The RFP pulper is a custom-engineered continuous type rotating drum pulper described as follows:

Make / Model: Andritz FibreFlow Drum Pulper
 Capacity: Rated - 2,050 ODMT/dy
 Permitted - 1,500 ODMT/dy / 1,837 ADTP/dy
 Drum Diameter: ~14.8 feet
 Drum Length: ~139 feet
 Exhaust description: Fugitive
 Location: 46°07'26.55"N 122°58'19.98"W

ADP Application CO-1088. NORPAC proposes to increase allowable production from the RFP Line from 1,200 ODMT/dy to 1,500 ODMT/dy. The drum pulper is rated for maximum production of 2,050 ODMT/dy so the proposed production increase will not require any physical modification of the unit.

- 5.b. Equipment/Activity Summary.

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

6. EMISSIONS DETERMINATION

Emissions to the ambient atmosphere from the Recovered Fiber Pulping Line, as proposed in ADP Application CO-1088, consist of volatile organic compounds (VOC), toxic air pollutants (TAPs), and hazardous air pollutants (HAPs).

Unless otherwise specified by SWCAA, actual emissions must be determined using the specified input parameter listed for each emission unit and the following hierarchy of methodologies:

- Continuous emissions monitoring system (CEMS) data;
- Source emissions test data (EPA reference method). When source emissions test data conflicts with CEMS data for the time period of a source test, source test data must be used;
- Source emissions test data (other test method); and
- Emission factors or methodology provided in this TSD.

- 6.a. Recovered Fiber Pulping Line (modified). Potential emissions from operation of the recovered fiber pulping line are calculated based on maximum proposed pulp production (1,500 ODMT/dy) and emission factors from NCASI Technical Bulletins #1020 "Compilation of Criteria Air Pollutant Emissions Data for Sources at Pulp and Paper Mills Including Boilers (Dec 2013)" and #1050 "Compilation of Air Toxics Emissions Data for Pulp and Paper Sources (Sept 2018)". Emission calculations assume 1.11 ADMT per ODMT and 1.1025 ton per metric ton.

The VOC emission factor in NCASI Technical Bulletin #1020 is given on a lb-carbon/ADTP basis. EPA guidance specifies that VOC emission factors should avoid using a carbon basis and be adjusted to reflect the actual chemical constituents present in the emission stream. The VOC emission factor has been converted to an 'as compound' basis using chemical constituent data from NCASI Technical Bulletin #1050. Unspecified VOC emissions were assumed to be alpha-pinene. The overall VOC scaling factor was calculated to be 1.56.

Pulp Production:	531,075	ADTP/yr	
	1,837	ADTP/dy	
	E.F.	Emissions	
Pollutant	lb/ADTP	lb/dy	tpy
VOC (lb-carbon)	0.011	20.21	2.92
VOC (lb-compound)	0.01716	31.52	4.56
TAPs			2.52
HAPs			2.52
			lb/yr
Acetaldehyde	0.00116	2.13	616.0
Biphenyl	0.00038	0.69	200.2
Carbon Disulfide	0.00294	5.40	1,561.4
Chloroform	0.00005	0.09	26.4
Formaldehyde	0.00014	0.25	73.3
Methanol	0.00253	4.65	1,343.6
Methylene Chloride	0.00023	0.43	123.7
Phenol	0.00031	0.56	163.0
Propionaldehyde	0.00014	0.26	75.9
Toluene	0.00160	2.94	849.7

ADP Application CO-1088. NORPAC proposes to increase allowable production from the Recovered Fiber Pulping Line from 1,200 ODMT/dy to 1,500 ODMT/dy. NORPAC also proposes to change the form of the existing emission limit from an hourly limit (60.6 ADTP/hr) to a daily limit (1,837 ADTP/dy). NORPAC is not proposing to change the existing annual production limit (531,075 ADTP/yr).

- 6.b. Emissions Summary. Project potential to emit as calculated in the section above is summarized below.

Pollutant	Emissions	Project Increase
NO _x	0.00 tpy	0.00 tpy
CO	0.00 tpy	0.00 tpy
VOC	4.56 tpy	0.00 tpy
SO ₂	0.00 tpy	0.00 tpy
Lead	0.00 tpy	0.00 tpy

<u>Pollutant</u>	<u>Emissions</u>	<u>Project Increase</u>
PM	0.00 tpy	0.00 tpy
PM ₁₀	0.00 tpy	0.00 tpy
PM _{2.5}	0.00 tpy	0.00 tpy
TAP	2.52 tpy	0.00 tpy
HAP	2.52 tpy	0.00 tpy

Pollutant	CAS Number	Category	Facilitywide Emissions (lb/yr)	Incremental Increase (lb/yr) / (lb/24-hr)	WAC 173-460 SQER (lb/yr) / (lb/24-hr)
Acetaldehyde	75-07-0	HAP/TAP A	616.0	616.0 / 2.13	50 / --
Biphenyl	92-52-4	HAP/TAP B	200.2	200.2 / 0.69	175 / 0.02
Carbon Disulfide	75-15-0	HAP/TAP B	1,561.4	1,561.4 / 5.40	17,500 / 2.0
Chloroform	67-66-3	HAP/TAP A	26.4	26.4 / 0.091	10 / --
Formaldehyde	50-00-0	HAP/TAP A	73.3	73.3 / 0.25	20 / --
Methanol	67-56-1	HAP/TAP B	1,343.6	1,343.6 / 4.65	43,748 / 5.0
Methylene Chloride	75-09-2	HAP/TAP A	123.7	123.7 / 0.43	50 / --
Phenol	108-95-2	HAP/TAP B	163.0	163.0 / 0.56	10,500 / 1.2
Propionaldehyde	123-38-6	HAP/TAP B	75.9	75.9 / 0.26	-- / --
Toluene	108-88-3	HAP/TAP B	849.7	849.7 / 2.94	43,748 / 5.0

7. REGULATIONS AND EMISSION STANDARDS

Regulations that have been used to evaluate the acceptability of the proposed facility and establish emission limits and control requirements include, but are not limited to, the regulations, codes, or requirements listed below.

- 7.a. Title 40 Code of Federal Regulations Part 60 (40 CFR 60) Subparts BB and BBa establish standards for affected facilities at kraft pulp mills. This facility is not a kraft pulp mill so this regulation is not applicable.
- 7.b. Title 40 Code of Federal Regulations Part 63 (40 CFR 63) Subpart S establishes standards for pulping and bleaching systems located at major sources that operate selected pulping processes or use secondary/non-wood fibers. This facility operates mechanical pulping processes using wood and processes secondary fibers but does not operate any bleaching systems. Therefore, this regulation is not applicable.
- 7.c. 40 CFR 63 Subpart MM establishes standards for chemical recovery combustion sources at major sources that operate kraft, soda, sulfite or stand-alone semichemical pulp mills. This facility does not operate any of the affected pulp mills, so this regulation is not applicable.
- 7.d. Revised Code of Washington (RCW) 70A.15.2040 empowers any activated air pollution control authority to prepare and develop a comprehensive plan or plans for the prevention, abatement, and control of air pollution within its jurisdiction. An air pollution control authority may issue such orders as may be necessary to effectuate the purposes of the Washington Clean Air Act [RCW 70A.15] and enforce the same by all appropriate administrative and judicial proceedings subject to the rights of appeal as provided in Chapter 62, Laws of 1970 ex. sess.
- 7.e. RCW 70A.15.2210 provides for the inclusion of conditions of operation as are reasonably necessary to assure the maintenance of compliance with the applicable ordinances, resolutions, rules, and regulations when issuing an Air Discharge Permit for installation and establishment of an air contaminant source.

- 7.f. Washington Administrative Code (WAC) 173-401 "Operating Permit Regulation" requires all major sources and other sources as defined in WAC 173-401-300 to obtain an operating permit. This facility is subject to this regulation and has obtained an air operating permit (AOP SW18-22-R0).
- 7.g. WAC 173-460 "Controls for New Sources of Toxic Air Pollutants" requires Best Available Control Technology for toxic air pollutants (T-BACT), identification and quantification of emissions of toxic air pollutants and demonstration of protection of human health and safety. SWCAA implements WAC 173-460 as in effect on August 21, 1998.
- 7.h. WAC 173-476 "Ambient Air Quality Standards" establishes ambient air quality standards for PM₁₀, PM_{2.5}, lead, sulfur dioxide, nitrogen dioxide, ozone, and carbon monoxide in the ambient air, which shall not be exceeded.
- 7.i. SWCAA 400-040 "General Standards for Maximum Emissions" requires all new and existing sources and emission units to meet certain performance standards with respect to Reasonably Available Control Technology (RACT), visible emissions, fallout, fugitive emissions, odors, emissions detrimental to persons or property, sulfur dioxide, concealment and masking, and fugitive dust.
- 7.j. SWCAA 400-050 "Emission Standards for Combustion and Incineration Units" requires that all provisions of SWCAA 400-040 be met and that no person shall cause or permit the emission of particulate matter from any combustion or incineration unit in excess of 0.23 grams per dry cubic meter (0.1 grains per dry standard cubic foot) of exhaust gas at standard conditions.
- 7.k. SWCAA 400-060 "Emission Standards for General Process Units" prohibits particulate matter emissions from all new and existing process units in excess of 0.1 grains per dry standard cubic foot of exhaust gas.
- 7.l. SWCAA 400-109 "Air Discharge Permit Applications" requires that an Air Discharge Permit application be submitted for all new installations, modifications, changes, or alterations to process and emission control equipment consistent with the definition of "new source". Sources wishing to modify existing permit terms may submit an Air Discharge Permit application to request such changes. An Air Discharge Permit must be issued, or written confirmation of exempt status must be received, before beginning any actual construction, or implementing any other modification, change, or alteration of existing equipment, processes, or permits.
- 7.m. SWCAA 400-110 "New Source Review" requires that SWCAA issue an Air Discharge Permit in response to an Air Discharge Permit application prior to establishment of the new source, emission unit, or modification.
- 7.n. SWCAA 400-113 "Requirements for New Sources in Attainment or Nonclassifiable Areas" requires that no approval to construct or alter an air contaminant source shall be granted unless it is evidenced that:
- (1) The equipment or technology is designed and will be installed to operate without causing a violation of the applicable emission standards;
 - (2) Best Available Control Technology will be employed for all air contaminants to be emitted by the proposed equipment;
 - (3) The proposed equipment will not cause any ambient air quality standard to be exceeded; and
 - (4) If the proposed equipment or facility will emit any toxic air pollutant regulated under WAC 173-460, the proposed equipment and control measures will meet all the requirements of that Chapter.

8. RACT/BACT/BART/LAER/PSD/CAM DETERMINATIONS

The proposed equipment and control systems incorporate Best Available Control Technology (BACT) for the types and amounts of air contaminants emitted by the processes as described below:

New BACT Determinations

- 8.a. BACT Determination – Recovered Fiber Pulping Line. The proposed use of low VOC process additives has been determined to meet the requirements of BACT and T-BACT for recovered fiber pulping operations at this facility.

Previous BACT Determinations

- 8.b. BACT Determination – Recovered Fiber Pulping Line (ADP 21-3452). The proposed use of low VOC process additives has been determined to meet the requirements of BACT and T-BACT for this recovered fiber pulping operation.

Other Determinations

- 8.c. Prevention of Significant Deterioration (PSD) Applicability Determination. The potential to emit of this facility is less than applicable PSD applicability thresholds. Likewise, this permitting action will not result in a potential increase in emissions equal to or greater than the PSD thresholds. Therefore, PSD review is not applicable to this action.
- 8.d. Compliance Assurance Monitoring (CAM) Applicability Determination. CAM is not applicable to any emission unit at this facility because it is not a major source and is not required to obtain a Part 70 permit.

9. AMBIENT IMPACT ANALYSIS

- 9.a. TAP Small Quantity Review. The incremental increases in TAP emissions associated with operation of the Recovered Fiber Pulping Line are quantified in Section 6 of this Technical Support Document. Incremental increases in individual TAP emissions are less than the applicable small quantity emission rate (SQER) identified in WAC 173-460 (effective 8/21/98) with the exception of the constituents listed in Section 9.b below.
- 9.b. TAP Ambient Impact Analysis. Project emissions were modeled using the EPA AERMOD dispersion model (v18081). The results of the model indicate that the project will not cause an incremental increase in ambient concentrations greater than the applicable acceptable source impact level (ASIL) identified in WAC 173-460 (effective 8/21/98).

Toxic Compound	CAS #	Incremental Ambient Impact ($\mu\text{g}/\text{m}^3$)	Acceptable Source Impact Level ($\mu\text{g}/\text{m}^3$)
Acetaldehyde	75-07-0	0.336 (annual)	0.45 (annual)
Biphenyl	92-52-4	0.47 (24-hr)	4.3 (24-hr)
Carbon Disulfide	75-15-0	3.7 (24-hr)	100 (24-hr)
Chloroform	67-66-3	0.014 (annual)	0.043 (annual)
Formaldehyde	50-00-0	0.040 (annual)	0.077 (annual)
Methylene chloride	75-09-2	0.068 (annual)	0.56 (annual)
Propionaldehyde	123-38-6	0.2 (24-hr)	8 (24-hr)*

* The 24-hr ASIL for propionaldehyde is calculated by dividing the ACGIH TLV-TWA of 20 ppm by 300 consistent with WA 173-460-110(2)(b).

Conclusions

- 9.c. Increased pulp production, as proposed in ADP Application CO-1088, will not cause the ambient air quality requirements of Title 40 Code of Federal Regulations (CFR) Part 50 "National Primary and Secondary Ambient Air Quality Standards" to be violated.
- 9.d. Increased pulp production, as proposed in ADP Application CO-1088, will not cause the requirements of WAC 173-460 "Controls for New Sources of Toxic Air Pollutants" or WAC 173-476 "Ambient Air Quality Standards" to be violated.
- 9.e. Increased pulp production, as proposed in ADP Application CO-1088, will not cause a violation of emission standards for sources as established under SWCAA General Regulations Sections 400-040 "General Standards for Maximum Emissions," 400-050 "Emission Standards for Combustion and Incineration Units," and 400-060 "Emission Standards for General Process Units."

10. DISCUSSION OF APPROVAL CONDITIONS

SWCAA has made a determination to issue ADP 24-3625 in response to ADP Application CO-1088. ADP 24-3625 contains approval requirements deemed necessary to assure compliance with applicable regulations and emission standards as discussed below.

- 10.a. Supersession of Previous Permits. ADP 24-3625 supersedes ADP 21-3452 in its entirety.
- 10.b. General Basis. Permit requirements for equipment affected by this permitting action incorporate the operating schemes proposed by the applicant in ADP Application CO-1088. Permit requirements established by this action are intended to implement BACT, minimize emissions, and assure compliance with applicable requirements on a continuous basis. Emission limits for approved equipment are based on the maximum potential emissions calculated in Section 6 of this Technical Support Document.
- 10.c. Monitoring and Recordkeeping Requirements. ADP 24-3625 establishes monitoring and recordkeeping requirements sufficient to document compliance with applicable emission limits, ensure proper operation of approved equipment and provide for compliance with generally applicable requirements. Specific requirements are established for pulp production.
- 10.d. Reporting Requirements. ADP 24-3625 establishes general reporting requirements for annual air emissions, upset conditions and excess emissions. Specific reporting requirements are established for pulp production. Reports are to be submitted on an annual basis.
- 10.e. Recovered Fiber Pulping Line. The pulping line is configured around a single drum pulper. Raw material (OCC, MP) is stored in adjacent warehouses prior to being fed into the pulper. The drum pulper is located outdoors and emission points are primarily fugitive in nature. Visible emissions are limited to 0% opacity consistent with proper operation.

11. START-UP AND SHUTDOWN/ALTERNATIVE OPERATING SCENARIOS/POLLUTION PREVENTION

- 11.a. Start-up and Shutdown Provisions. Pursuant to SWCAA 400-081 "Start-up and Shutdown", technology based emission standards and control technology determinations shall take into consideration the physical and operational ability of a source to comply with the applicable standards during start-up or shutdown. Where it is determined that a source is not capable of achieving continuous compliance with an emission standard during start-up or shutdown, SWCAA shall include appropriate emission limitations, operating parameters, or other criteria to regulate performance of the source during start-up or shutdown.

The applicant did not identify any start-up and shutdown periods during which affected equipment is not capable of achieving continuous compliance with applicable technology determinations or approval conditions. To SWCAA's knowledge, this facility can comply with all applicable standards during startup and shutdown.

- 11.b. Alternate Operating Scenarios. SWCAA conducted a review of alternate operating scenarios applicable to equipment affected by this permitting action. The permittee did not propose or identify any applicable alternate operating scenarios. Therefore, none were included in the permit requirements.
- 11.c. Pollution Prevention Measures. SWCAA conducted a review of possible pollution prevention measures for the facility. No pollution prevention measures were identified by either the permittee or SWCAA separate or in addition to those measures required under BACT considerations. Therefore, none were included in the permit requirements.

12. EMISSION MONITORING AND TESTING

There are no formal emission monitoring or testing requirements for this facility.

13. FACILITY HISTORY

- 13.a. Previous Permitting Actions. SWCAA has previously issued the following Permits for this facility:

<u>Date</u>	<u>Application Number</u>	<u>Permit Number</u>	<u>Purpose</u>
4/13/2021	CO-1014	21-3452	Installation and operation of a new drum pulper and recovered fiber pulping line including drum pulper, cleaners, deckers, dump tower, screens, and product handling and conveying.
4/20/2017	--	PSD 97-01-A4	This permitting action was an administrative action to change the name of the facility owner and confirm existing emission factors for the NORPAC I and II process units.
6/12/2001	--	Ecology 01-0612LET	This permitting action approved modifications to the 4 th dryer section of paper machine #2. CO and VOC emission increases from this project were incorporated in PSD 97-01-A1. (<i>See March 19, 2004 netting analysis</i>)
10/20/2000	--	Ecology 00AQIS-1704	This permitting action approved replacement of the drive system on paper machine #1. The action was subject to review for toxic air pollutants only. Criteria pollutant emission increases were de minimis for NSR purposes. CO and VOC emission increases from this project were incorporated in PSD 97-01-A1. (<i>See March 19, 2004 netting analysis</i>)
6/1/2000	--	Ecology 00AQIS-1196	This permitting action approved the installation of a new suction box on paper machine #1. The action was subject to review for toxic air pollutants only. Criteria pollutant emission increases were de minimis for NSR purposes. CO and VOC emission increases from this project were incorporated in PSD 97-01-A1. (<i>See March 19, 2004 netting analysis</i>)

<u>Date</u>	<u>Application Number</u>	<u>Permit Number</u>	<u>Purpose</u>
10/8/1998 8/24/1998	--	Ecology 98AQ-I046	This permitting action revised approval conditions for the dust control system in the pulper house for the purposes of facilitating issuance of an AOP for the facility. This order was originally issued on August 24, 1998. Amended pages were issued on October 8, 1998.
5/14/1997	--	Ecology 97AQ-I041	This permitting action revised existing approval conditions for NORPAC III to incorporate emission information unavailable at the time of initial approval and to accurately reflect the physical configuration of paper machine #3.
9/23/1986	CO-310	SWCAA O/A 86-837	This permitting action approved the installation of a hydrogen peroxide pulp treatment system in the #2 TMP mill.
1/19/1982	CO-242A	SWCAA O/A 81-638	This permitting action approved the installation of a new refiner line at the existing thermomechanical pulping mill. This unit is referred to as refiner line 6 and operates as an integral part of TMP-2. The portions of this order that relate to emissions of CO and VOC were superseded by PSD 97-01.
8/23/1979	CO-242	SWCAA O/A 79-475	This permitting action approved the installation of a thermomechanical pulping mill (TMP-2), a new paper machine (PM-2), and related equipment. This project is commonly referred to as NORPAC II and includes refiner lines 5, 7-9 and paper machine #2. The portions of this order that relate to emissions of CO and VOC were superseded by PSD 97-01.
3/16/1978	CO-216	SWCAA O/A 78-326	This permitting action approved the installation of a thermomechanical pulping mill (TMP-1), a new paper machine (PM-1), and related equipment. This project is commonly referred to as NORPAC I. The portions of this order that relate to emissions of CO and VOC were superseded by PSD 97-01.

Obsolete/Superseded Permits

7/29/2010	--	PSD 97-01-A3	<i>This permitting action incorporated the results of process improvements and energy conservation projects that reduced emissions after the issuance of PSD 97-01, Amendment 2. CO and VOC emission factors were revised consistent with the results of 2008 and 2009 source testing at the facility. CO and VOC emission limits were revised using updated emission factors and production projections. Source testing requirements for NORPAC I and II were revised to allow reduced testing frequency from once every three years to once every five years if two consecutive source tests indicate emission factor changes within +/- 20% of the 2008-2009 emission rates.</i> <i>This permit was superseded by PSD 97-01, Amendment 4.</i>
4/24/2004	--	PSD 97-01-A2	<i>This permitting action was an administrative amendment to PSD 97-01, Amendment 1.</i> <i>This permit was superseded by PSD 97-01, Amendment 3.</i>

<u>Date</u>	<u>Application Number</u>	<u>Permit Number</u>	<u>Purpose</u>
3/25/2004	--	PSD 97-01-A1	<i>This permitting action revised CO and VOC emission limits and operating requirements established in PSD 97-01 to allow the facility to produce higher volumes of high brightness and high basis weight paper grades. This action did not constitute a major modification.</i>
			<i>This permit was superseded by PSD 97-01, Amendment 2.</i>
12/9/1997	--	PSD 97-01	<i>This permitting action approved CO and VOC emission increases associated with installation and operation of the NORPAC I and II facilities. PSD 97-01 established combined CO and VOC emission limits for NORPAC I and II and limited pulp and paper production rates. PSD 97-01 superseded those portions of SWCAA Orders 78-326, 79-475 and 81-638 that relate to emissions of CO and VOC.</i>
			<i>This permit was superseded by PSD 97-01, Amendment 1.</i>
4/21/1997 12/23/1996	--	Ecology 96AQ-I093	<i>This permitting action approved the installation of new and improved screening units in the thermomechanical pulping mill. This project increased the production capability of the mill. This order was originally issued on December 23, 1996. Amended pages were issued on April 21, 1997.</i>
			<i>This permit was superseded by PSD 97-01.</i>
11/27/1995	--	Ecology 95AQ-I076	<i>This permitting action approved a rebuild of Paper Machine #2. This project increased the production capability of the unit.</i>
			<i>This permit was superseded by PSD 97-01.</i>
5/10/1994	CO-505	SWCAA 94-1604	<i>This permitting action approved installation of a dust control system to control particulate emissions generated by the handling of old newsprint in the pulper house. Emissions were controlled with a dedicated baghouse.</i>
			<i>This order was revoked by 98AQ-I046.</i>
10/16/1989	CO-378	SWCAA 89-1131	<i>This permitting action approved the installation a recycle newsprint de-inking plant, a new paper machine (PM-3), and related equipment. This project is commonly referred to as NORPAC III.</i>
			<i>This order was revoked by 97AQ-I041.</i>
8/9/1987	CO-327	SWCAA 87-919	<i>This permitting action approved the installation of a sandblasting and painting operation.</i>
			<i>This order is obsolete. The approved equipment has been permanently removed service.</i>

- 13.b. Compliance History. A search of source records on file at SWCAA identified the following outstanding compliance issues at the NORPAC facility.

<u>Date</u>	<u>NOV Number</u>	<u>Violation</u>
12/19/2022	10394	Implementation of process modifications that resulted in potential emission increases without new source review.

14. PUBLIC INVOLVEMENT OPPORTUNITY

- 14.a. Public Notice for ADP Application CO-1088. Public notice for ADP Application CO-1088 was published on the SWCAA internet website for a minimum of (15) days beginning on December 27, 2023.
- 14.b. Public/Applicant Comment for ADP Application CO-1088. A (30) day public comment period was provided for this permitting action pursuant to SWCAA 400-171(3) beginning on January 25, 2024. SWCAA did not receive any comment from the applicant or the public during the public comment period for this permitting action.
- 14.c. State Environmental Policy Act. Cowlitz County issued a Determination of Nonsignificance (DNS) for construction of the Recovered Fiber Pulping Line on June 19, 2019. The modifications proposed in ADP Application CO-1088 do not substantively change the impact or nature of the project. Hence, no new SEPA review has been conducted.