



**Air Quality Permitting
Response to Public Comments
During the First Public Comment Period**

July 16, 2009

Tier I Operating Permit No. T1-2007.0105

**Clearwater Paper Corporation – Consumer Products
Lewiston, Idaho**

Facility ID No. 069-00001

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Final

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1. BACKGROUND

In accordance with IDAPA 58.01.01.364.0, the Department of Environmental Quality (DEQ) provided for public comment the proposed renewal to the Tier I Operating Permit (T1-2007.0105) for Clearwater Paper Consumer Products Division located in Lewiston Idaho on February 2, 2009. Clearwater Paper Corporation consists of two Divisions; the Pulp Mill and the Consumers Products Division. The Clearwater Paper Corporation is considered one facility for Tier I permitting purposes though the permit is issued in two parts (one for the Pulp Mill and one for the Consumer Products Division). This response to comments is for the Consumer Products Division section of the Tier I permit. The Response to Comments on the Pulp Mill section of the permit is provided in a separate document in response to comments on Tier I Permit No. T1-2007.0106.

DEQ provided the comment period from February 2, 2009, through March 4, 2009. Comments were provided via email. Each comment and DEQ's response is provided in the following section. All comments submitted in response to DEQ's proposed action are included within the appendix of this document.

A second public comment period is being held because significant changes to the draft permit have been made based on comments received during the first comment period.

2. PUBLIC COMMENT AND RESPONSES

Public comments regarding the permit analysis and air quality aspects of the proposed permit are summarized below. Due to the similarity of many of the comments received, the summary presented below combines and/or paraphrases some comments in order to eliminate duplication and to provide a more concise summary. Questions, comments, and/or suggestions received during the comment period that did not relate to the air quality aspects of the permit application, the Department's technical analysis, or the proposed permit are not addressed.

Comment 1:

Air pollution - when I can SEE it and SMELL it, I am upset and very concerned. Lewiston has long been referred to as "The Armpit of Idaho". If the area is ever going to progress, it is time to do something about it. Due to the surrounding topography, The Lewis-Clark Valley should have restrictive covenants concerning both current and future polluting industries. Time for change here. (Lynn Tobin, via email)

Response 1:

DEQ appreciates comments provided on the Proposed Tier I Operating Permit for the Clearwater Paper Corporation.

Currently, Clearwater Paper Corporation is not proposing a modification to the existing facility which would cause changes to concentrations of air pollutants in ambient air. The Lewiston area is classified as attainment for sulfur dioxide and unclassifiable for all other criteria air pollutants (i.e. particulate matter, carbon monoxide, ozone, nitrogen dioxide) in accordance with 40 CFR 81.313.

The proposed permit that was issued for public comment is a Tier I Operating Permit Renewal. Tier I permits expire every five years; this permitting action is solely to renew the Tier I permit which has expired. The Tier I permitting requirements are primarily administrative, the purpose of the Tier I Permit is to consolidate all existing applicable requirements into one document. Consistent with the Tier I permitting requirements the proposed permit includes all applicable requirements, and where necessary adds monitoring to assure compliance with those requirements.

Result: No changes to Permit or Statement of Basis.

Comment 2:

General Comment

Many of the applicable requirements were established in previously issued permits. The proposed permit often simply cites a permit as the basis for the requirement without any additional explanation as to why the requirement was imposed. Specifically, It can be important to know the original basis for the applicable requirement. Certain of those requirements must stay in effect for the life of the operation, while other existing requirements may be removed at the discretion of the agency if the requirement is obsolete, lacks a regulatory basis, or is not environmentally beneficial. Keeping track of the basis is important for future permit actions and revisions. Note that this comment was also made by EPA Region 10 in a 2003 Idaho Title 5 program review document. (Clearwater Paper Corporation)

Response 2:

The purpose of the Tier I permit is to consolidate all existing applicable requirements into one permit and to add monitoring where necessary to assure compliance with those requirements. IDAPA 58.01.01.322.02 requires

citing the authority for all applicable requirements contained in the Tier I permit. DEQ has cited the authority for all permit conditions in the Tier I permit. The citation is often for underlying permit conditions; it is not necessary to document why the applicable requirement from underlying permits were established it is only necessary to document which permit the applicable requirement comes from. This is similar to NSPS and NESHAP provisions included in Tier I permits; it is not necessary to document in the Tier I permitting process why these regulations were developed, it is only necessary to cite where they come from. EPA's comment on Idaho's Title 5 program was to the affect that where existing permit conditions do not have sufficient monitoring to assure compliance then it is necessary to add monitoring and to explain why that monitoring was added to the Tier I permit. Including sufficient monitoring to assure compliance with applicable requirements is a basic requirement of the Tier I permit process (IDAPA 58.01.01.322.06).

If Clearwater proposes to modify underlying permits it becomes important to understand why the underlying permit requirements were developed. For instance if a permit condition is requested to be changed and is solely a request to relax that condition (no physical or operational change is occurring) then that relaxation can not be to extent that it would trigger PSD without going through the PSD permitting process for that relaxation. Clearwater may review previous applications submitted to obtain the underlying permits and may request the statement of basis written to support the issuance of the permit in order to ascertain the origin of the permit condition.

Result: No changes to Permit or Statement of Basis.

Comment 3:

Section 3. Summary description

Please change the phrase “drying the sheet via steam heat air” to “drying the sheet via a steam heated cylinder and high-velocity gas heated air”.

Please correct the sentence between the tables. This sentence should refer to table 3.2.
(Clearwater Paper Corporation)

Response 3:

DEQ has added the phrase: “drying the sheet via a steam heated cylinder and high-velocity gas heated air” to the summary description. DEQ has also changed the table reference to Table 3.2 instead of Table 2.2.

Result: The summary description of Section 3 of the Tier I permit has been changed to include the following statement as requested. The reference to the table has been changed to 3.2 instead of 2.2.

Comment 4:

Table 3.2

For condition 3.1 please delete “6.2-6.15” under Monitoring and Recordkeeping Requirements.

Condition 3.2

CAM is not an applicable requirement. Please delete this condition.

Table 4.2

For emission points 2, 56 please delete CAM requirements under Monitoring and Recordkeeping Requirements.

(Clearwater Paper Corporation)

Response 4:

Permit Conditions 6.2 -6.15 included CAM requirements for the 1L, 2L, and 3L tissue machines. The CAM requirements in the draft Tier I permit were developed based on the June 19, 2007 CAM plan provided by Clearwater for these emissions units. Clearwater has provided an updated CAM applicability analysis as part of their comment on the draft Tier I permit. DEQ has deleted CAM from the permit as well as any references to CAM (i.e. Permit Conditions 6.2-6.15) because Clearwater's uncontrolled emission inventory is below 100 tons per year for the tissue machines (See Comment 6).

Result: The CAM requirements which were included in Section 6 of the permit have been deleted. All references to CAM have also been deleted.

Comment 5:

Table 4.2

For emission point 2 & 56 please add a reference under Monitoring and Recordkeeping Requirements. (see comment on Condition 4.8)

Condition 4.8

The 7/7/98 permit also contains the following monitoring parameter;

“3L Tissue Machine Yankee Dryer average fuel gas feed rate in millions of cubic feet per hour.”

Please add this parameter to condition 4.8.

Response 5:

DEQ had inadvertently omitted the monitoring requirement for the natural gas fuel usage rate. This requirement has now been added to Permit Condition 4.8. Table 4.2 has also been updated to reference Permit Condition 4.8 as the monitoring requirement for the NO_x and PM emissions limits on the 3L tissue machine hood exhaust.

Comment 6:

Section 6 CAM Applicability: 1L, 2L, 3L Tissue Machines and Valmet Rewinder

The draft CPD renewal permit contains compliance assurance monitoring (CAM) requirements for the 1L, 2L, and 3L Tissue Machine wet scrubbers and the Valmet Rewinder wet scrubber. As indicated in our Tier I permit renewal application, the ‘major’ status of uncontrolled emissions from these units and thus CAM applicability was uncertain. Source testing in the ductwork upstream of the scrubbers is infeasible and calculating uncontrolled emissions from scrubber outlet data is inaccurate.

The National Council for Air and Stream Improvement (NCASI) recently published a technical bulletin on PM emissions from paper machine sources. (“Measurement of PM, PM₁₀, PM_{2.5} and CPM emissions from Paper Machine Sources” NCASI Technical Bulletin 942, November 2007). This information provides a sound technical basis for estimating uncontrolled emissions from the CPD tissue machines and Valmet Rewinder. It can now be shown that uncontrolled emissions from these emissions units are well below 100 tpy of PM. Therefore, Clearwater requests that the CAM requirements for these units be removed from the draft Tier I permit prior to issuance. Potential uncontrolled emissions calculations are documented below.

NCASI Bulletin 942 reports test results from five paper machines, including a tissue machine (Paper Machine Source C). Source C was not equipped with particulate emissions control. Emissions in lb/hr and lb/ton of paper produced are reported for multiple vent categories (16 total vents for Source C) and in aggregate by paper machine type. The overall PM emission factor reported for tissue machines is 0.86 lb/ton. See pp. 45 and E9 (Table E3a) of NCASI Technical Bulletin 942.

This factor represents the total emissions from former and press section (wet end), dryer section, and winder and reel section vents.

The CPD tissue machines are controlled by wet scrubbers that collect PM from the dry end of the machines (dryer and reel sections). As a conservative approach, Clearwater applied the total tissue machine emission factor of 0.86 lb/ton reported in NCASI Bulletin 942 to the maximum production rates of the CPD tissue machines to calculate potential uncontrolled emissions. For the Valmet Rewinder, the total emission factor for the winder and reel section was applied. The PTE calculation is presented below. As shown, potential uncontrolled emissions from the 1L, 2L, and 3L Tissue Machines and Valmet Rewinder are each below 100 tons/yr of PM.

Tissue Machine	Max. Capacity (tons/yr)	PM Emission Factor	PTE (tons/yr)
1L	5.5*	0.86	20.7
2L	10	0.86	37.7
3L	10	0.86	37.7
Valmet Rewinder	5	0.25	5.5

*annual average; reflects pending PTC application for hood burner replacement project

Please delete section 6.

Response 6:

Based on Clearwater’s comment, which includes an uncontrolled emission inventory of less than 100 tons per year for PM/PM-10, DEQ has removed CAM requirements from the Tier I permit. CAM is only applicable to emissions units which have potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 tons per year (40 CFR 64.2(a)(3)).

Result: The CAM requirements which were included in Section 6 of the permit have been deleted.

Comment 7:

General Condition 21a.

Please revise this condition as follows: “The compliance certifications for all emissions units shall be submitted annually from January 1 to December 31 or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by DEQ.”

General Condition 24

Please revise this condition as follows: “In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months. The permittee’s semiannual reporting periods shall be from January 1 to June 30 and July 1 to December 31.”

Response 7:

Result: DEQ has amended General Conditions 21a and 24 as requested.

Appendix

Comments Received on the Draft Permit