

History	IDAPA	Basis for Revision	CLW Comments
<p>In effect since at least 1972. In SIP, 2003.</p>	<p><b>815. RULES FOR CONTROL OF KRAFT PULPING MILLS.</b>  The purpose of Sections 815 through <del>819</del> <del>826</del> is to <u>incorporate by reference federal regulations for establish for kraft pulping mills restrictions additional to the general rules presented in this Chapter; to formulate a schedule for compliance with the restrictions; and to formalize the policy of the Department concerning emissions control, monitoring, and recordkeeping from kraft pulping mills. This regulation reflects the highest and best practicable treatment and control of emissions through the utilization of technically feasible equipment, devices and procedures. Subject to applicable law, the Department may develop and impose additional requirements for kraft pulp mills.</u></p>	<p>Revisions are intended to replace outdated policy and outdated rules with reference to current federal requirements. The existing rules impose control requirements that are less stringent than newer emissions control limitations promulgated by EPA. Maintaining the existing rules creates confusion and redundancy for the existing covered source. In the event of construction of a new kraft pulp mill in Idaho, the federal standards would also apply.</p>	
<p>In effect since at least 1972. In SIP, 2003.</p>	<p><b>816. STATEMENT OF POLICY.</b>  It is hereby declared to be the policy of the Department to:  <b>01. Best Treatment And Control.</b> Require, in accordance with a specific program and timetable, the highest and best practicable treatment and control of emissions through the utilization of technically feasible equipment, devices and procedures. (5-1-94)  <b>02. Monitoring.</b> Require effective monitoring and reporting of emissions and reporting of other data pertinent to air quality or emissions. The Department will use these data in conjunction with other data on ambient air and local conditions to develop and revise emission standards and air quality standards as necessary, and to determine compliance therewith. (5-1-94)  <b>03. Research.</b> Encourage and assist the kraft pulping industry to conduct research and technological</p>	<p>Deletion is appropriate because the policy is no longer appropriate or required. Federal regulations now prescribe strict emissions controls, continuous monitoring, and frequent recordkeeping through NSPS, MACT, BACT, and LAER technology based standards.</p> <p>In addition, standards development, research, and technology assessments are performed by EPA, not IDEQ. Presently, EPA's pulp and paper industry standards (NESHAP and NSPS) are subject to EPA priority regulatory review.</p> <p><i><a href="http://yosemite.epa.gov/opei/RuleGate.nsf/byRIN/2060-AQ41?opendocument">http://yosemite.epa.gov/opei/RuleGate.nsf/byRIN/2060-AQ41?opendocument</a></i></p>	

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	<p>development designed to progressively reduce emissions in accordance with specific programs, objectives and time schedules. (5-1-94)</p> <p><b>04. Available Technology Required.</b> Establish standards deemed to be technically feasible and reasonably attainable, with the intent of revising the standards as necessary when new information and technology are developed (5-1-94)</p> <p><b>05. New Source Standards.</b> Establish more restrictive standards for new mills or for mills expanding existing facilities. (5-1-94)</p>		
<p>In effect since at least 1972. In SIP, 2003.</p>	<p><b>817. GENERAL RULES.</b> All emission standards in Sections 818 through 823 are based on average daily emissions. These limitations do not preclude a requirement to install the highest and best practicable treatment and control available. (5-1-94)</p>	<p>This statement is unnecessary.</p>	
<p>In effect since at least 1972. Not in the SIP.</p>	<p><b>81618. RECOVERY FURNACE STANDARDS.</b> <u>The Department incorporates by reference the emissions control standards, monitoring, reporting and recordkeeping requirements of 40 CFR Part 60, Subpart BB; 40 CFR Part 63, Subparts S and MM that limit emissions from recovery furnaces. The emission of TRS from all recovery furnace stacks shall not exceed two (2) pounds of sulfur per ton of equivalent air dried kraft pulp or, from each recovery furnace stack, seventy (70) ppm expressed as hydrogen sulfide on a dry basis, whichever is the more restrictive. Compliance shall be achieved by December, 1972. (5-1-94)</u></p>	<p>The standard in IDAPA 818 is obsolete in light of IDAPA 819 -- one-half (1/2) pound of sulfur per equivalent ton of air-dried kraft pulp. Meanwhile, federal regulations now require TRS emissions controlled to 5 ppm, a significantly more stringent level than either of the existing standards for recovery furnaces.</p>	<p>For #5 Recovery Furnace the NSPS TRS limit is 5 ppm @ 8% O2.</p> <p>For #4 Recovery Furnace (not subject to NSPS) a valid PTC imposes a limit of 15 ppm, equal to 0.38 lb/ADTP. This equates to 28.5 tpy TRS. Emissions are continuously monitored and average less than 5 ppm annually.</p>

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In effect since at least 1972. Not in the SIP.	<p><b><del>819. RECOVERY FURNACE TRS STANDARDS.</del></b>  <del>The emission of TRS from all recovery furnace stacks shall be further reduced so as not to exceed one half (1/2) pound of sulfur per equivalent ton of air dried kraft pulp, or from each recovery furnace stack seventeen and one half (17/12) ppm, expressed as hydrogen sulfide on a dry gas basis, whichever is the more restrictive, or such other limit of TRS that proves to be reasonably attainable utilizing the latest in design of recovery furnace equipment, controls, and procedures. Compliance shall be achieved by not later than July, 1975. (5-1-94)</del></p>	See above.	
In effect since at least 1972. Not in the SIP.	<p><b>81720. DIGESTER AND EVAPORATOR STANDARDS.</b>  <u>The Department incorporates by reference the emissions control standards, monitoring, reporting and recordkeeping requirements of 40 CFR Part 60, Subpart BB; and 40 CFR Part 63, Subpart S that limit emissions from digesters and evaporators.</u>  <del>Noncondensibles from digesters and multiple effect evaporators shall be treated to reduce the emission of TRS equal to the reduction achieved by thermal oxidation in a lime kiln. Compliance with this requirement shall be achieved by not later than July, 1972. (5-1-94)</del></p>	This existing narrative standard is superseded and unnecessary, in light of MACT technology based standards that control digester and evaporator emissions. Recent EPA standards are more representative of industry operations and clearer to implement than this outdated requirement. EPA determined in the MACT standard what it means to be “treated to reduce the emission of TRS equal to the reduction achieved by thermal oxidation in a lime kiln.” Therefore, this narrative standard is now vague, confusing, and obsolete.	MACT standards apply to all LVHC and HVLC sources and emissions, such as non-condensable gases. Presently, NSPS standards also apply to one digester, the evaporators, and the chip washers.
In effect since at least 1972. In SIP, 2003.	<p><b><del>821. RECOVERY FURNACE PARTICULATE STANDARDS.</del></b>  <del>The emission of particulate matter from all recovery furnace stacks shall not exceed four (4) pounds per ton of equivalent air dried h a f t pulp. Compliance with this requirement shall be achieved by not later than July, 1975.</del></p>	See revisions above to incorporate emissions controls for recovery furnaces promulgated by EPA. This existing rule may have been appropriate to address TSP non-attainment issues in Lewiston, Idaho. There is no longer a NAAQS basis for this rule and subsequent federal standards impose more stringent technology based limits to control particulate emissions from recovery furnaces.	For #4 and #5 Recovery Furnaces, the MACT limit of 0.044 gr/dscf @ 8% O2 is equivalent to 2.55 lb/ADTP, more stringent than the rule. The #5 Recovery Furnace is subject to the same MACT and NSPS limit.

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In effect since at least 1972. In SIP, 2003.	<p><b>81822. LIME KILN STANDARDS.</b>  <u>The Department incorporates by reference the emissions control standards, monitoring, reporting and recordkeeping requirements of 40 CFR Part 60, Subpart BB; and 40 CFR Part 63, Subpart MM that limit emissions from lime kilns. The emission of particulate matter from all lime kilns shall not exceed one (1) pound per ton of equivalent air dried kraft pulp. Compliance with this requirement shall be achieved by not later than July, 1975. (5-1-94)</u></p>	This existing numeric standard is superseded by MACT technology based standards that control lime kiln emissions. Recent EPA standards are more representative of industry operations and clearer to implement.	The MACT Standard is 0.064@ 10% O <sub>2</sub> , which is equivalent to 0.46 lb/ADTP, which is more stringent than this existing rule.
In effect since at least 1972. In SIP, 2003.	<p><b>81923. SMELT TANK STANDARDS.</b>  <u>The Department incorporates by reference the emissions control standards, monitoring, reporting, and recordkeeping requirements of 40 CFR Part 60, Subpart BB; and 40 CFR Part 63, Subpart MM that limit emissions from smelt tanks. The emission of particulate material from all smelt tanks shall not exceed one half (1/2) pound per ton of equivalent air dried kraft pulp. Compliance with this requirement shall be achieved by not later than July, 1972. (5-1-94)</u></p>	This existing numeric standard is superseded by MACT technology based standards that control smelt tank emissions. Recent EPA standards are more representative of industry operations and clearer to implement.	The MACT Standard is 0.2 lb/TBLS, which is equivalent to 0.35 lb/ADTP, which is more stringent than this existing rule.
In effect since at least 1972. Not in the SIP.	<p><b>824. MONITORING AND REPORTING.</b>  <b>01. Continuous Monitoring Requirements.</b> Every kraft mill in the State shall install equipment for the continuous monitoring of TRS. (5-1-94)  <b>a.</b> <del>The monitoring equipment shall be capable of determining compliance with these standards and shall be capable of continuous sampling and recording of the concentrations of TRS contaminants during a time interval not greater than thirty (30) minutes. (5-1-94)</del>  <b>b.</b> <del>The sources monitored shall include, but are not limited to, the recovery furnace stacks and the lime kiln stacks. (5-1-94)</del></p>	The revisions proposed here incorporate federal provisions that require continuous monitoring consistent with the federal emissions control regulations. In light of newer federal requirements, this existing requirement is confusing and does not provide useful information to determine compliance.	Pursuant to valid permit requirements and NSPS, the mill operates continuous TRS emissions monitors on both recovery boilers (required by NSPS and PTC) and the lime kilns (required by PTC) and will continue to do so.

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In effect since at least 1972. In SIP, 2003.	<del><b>02. Particulate Sampling.</b> Each mill shall sample the recovery furnace, lime kiln, and smelt tank for particulate emissions on a regularly scheduled basis in accordance with its sampling program as approved by the Department. The appropriate test method under Sections 821 through 823 shall be EPA Method 5 contained in 40 CFR Part 60 or such comparable and equivalent method approved in accordance with Subsection 157.02.d. Test methods and procedures shall also comply with Section 157. (4-5-00)</del>	This sampling framework is no longer appropriate. Performance testing and compliance determination source tests are required by federal regulations (NSPS, MACT). MACT standards for the lime kilns, recovery furnaces, and smelt dissolvers also require continuous monitoring methods, which are more stringent compliance demonstrations than periodic sampling. In addition permits, such as the Tier I permit, may require additional testing and emissions monitoring. Moreover, sampling for particulate may have been appropriate during designation of Lewiston, Idaho as a NAA for TSP. The area is now in attainment.	
In effect since at least 1972. In SIP, 2003.	<del><b>03. Monitoring Program And Time Schedule Submittal.</b> Each mill shall submit within sixty (60) days after the original effective date of Sections 815 through 826 a detailed monitoring program and time schedule for approval by the Department. The equipment shall be ordered within thirty (30) days after the monitoring program has been approved in writing by the Department. The equipment shall be placed in effective operation in accordance with the approved program within ninety (90) days after delivery. (5-1-94)</del>	These compliance dates were 30 years ago. There is no ongoing obligation. In addition, requirements for monitoring and compliance demonstration were replaced by federal regulations and by Tier I requirements.	
In effect since at least 1972. In SIP, 2003.	<del><b>04. Quarterly Reporting Requirements.</b> Unless otherwise authorized by the Department, data shall be reported by each mill at the end of each calendar quarter, as follows: (4-5-00) a. Daily average emission of TRS gases expressed in parts per million on a dry gas basis for each source included in the approved monitoring program. (5-1-94) b. The number of hours each day that the emission of TRS gases from each recovery furnace stack exceeds emission standards and the maximum concentration of TRS measured each day. (5-1-94)</del>	Requirements for recordkeeping and reporting were replaced by federal regulations and by Tier I requirements.	This quarterly report requirement was superseded by issuance of the Tier I permit.

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	<p><b>c.</b> Emission of TRS gases in pounds of sulfur per equivalent air dried ton of pulp processed in the kraft cycle on a quarterly basis for each source included in the approved monitoring program. (4-5-00)</p> <p><b>d.</b> Emission of particulates in pounds per equivalent air dried ton of pulp produced in the kraft cycle based upon sampling conducted in accordance with the approved monitoring program. (5-1-94)</p> <p><b>e.</b> Average daily equivalent kraft pulp production in air dried tons. (5-1-94)</p> <p><b>f.</b> Other emission data as specified in the approved monitoring program. (5-1-94)</p>		
<p>In effect since at least 1998. In SIP, 2003.</p>	<p><b>05. Semi-Annual Reporting Requirements.</b> Unless otherwise authorized by the Department, excess emissions data for emissions units covered by Section 820 shall be reported by each mill at the end of each semiannual calendar period, as follows: (4-5-00)</p> <p><b>a.</b> Excess emissions for the semi-annual report required by Subsection 824.05 shall be defined as periods during which noncondensibles are not treated as required by Section 820. Periods of excess emissions reported under Subsection 824.05 shall not be a violation under Section 820 provided that the time of excess emissions (excluding periods of startup, shutdown, or malfunction) divided by the total process operating time in a semi-annual period does not exceed one percent (1%). (4-5-00)</p> <p><b>b.</b> The total duration of excess emissions during the reporting period (recorded in hours). (4-5-00)</p> <p><b>e.</b> The total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and (4-5-00)</p> <p><b>d.</b> A breakdown of the total duration of excess emissions during the reporting period into those that are due to startup/shutdown, control equipment problems, process problems, other known causes, and</p>	<p>These requirements for recordkeeping and reporting are redundant in light of the proposed incorporation by reference of federal regulations (NSPS and MACT). Semi-annual reporting is also required by the Tier I requirements.</p>	

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In effect since at least 1972. In SIP in 2003.	<p><b>825. SPECIAL STUDIES.</b> Special studies, having prior approval of the Department, shall be conducted, and the results thereof submitted to the Department by December, 1972. (5-1-94) <b>01. Areas To Be Included.</b> The studies shall cover the following areas: (5-1-94)</p> <p><b>a. TRS Emissions.</b> Evaluation of the emissions of TRS from all other sources within the mill. Other sources mean sources of odorous sulfur emissions including, but not limited to, vents from lime kilns, knotters, brown stock pulp washers, multiple effect evaporators, digesters, blow tanks, smelt tanks, blow heat accumulators, black liquor storage, black liquor oxidation systems, tall oil recovery operations, and any operation connected with the handling of condensate liquids within the mill or any vent which may be a significant contributor of odorous gases. (5-1-94)</p> <p><b>b. Sulfur Dioxide Emissions.</b> Evaluation of the emissions of sulfur dioxide from all sources within the mill, including but not necessarily limited to, the recovery furnace, lime kiln, and power boilers. (5-1-94)</p> <p><b>e. Water Vapor.</b> Evaluation of water vapor emissions from all sources within the mill. (5-1-94)</p> <p><b>02. Additional Studies.</b> The Department may require such additional special studies relevant to air</p>	The compliance date was 30 years ago. There is no ongoing obligation.	

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	<del>pollution and establish completion dates as necessary. (5-1-94)</del>		
In effect since at least 1972. In SIP in 2003.	<b>826. EXCEPTIONS.</b> <del>The emission limits established under Sections 817 through 823 apply to the specific process as described. These emission limits do not apply to open burning, power boilers, or other operations conducted at the site of or ancillary to the kraft pulp mill operation. Such ancillary operations must meet standards established in this chapter. (5-1-94)</del>	This rule does not add any substantive requirement.	