



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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March 12, 2008

Ms. Eveleen Muehlethaler  
Port Townsend Paper Corporation  
P.O. Box 3170  
Port Townsend, WA 98368

Dear Ms. Muehlethaler:

As you know, Ecology prepared a draft BART Regulatory Order and a draft Technical Support Document (TSD), which we have shared with you. Ecology held an informal consultation on these documents with Federal Land Managers (FLMs) as part of addressing consultation requirements of the Clean Air Act and the Regional Haze Rule. As a result of the consultation, Ecology has decided to revise some aspects of the draft BART TSD to facilitate eventual approval of BART by EPA.

We need your assistance to address the items discussed below. If not addressed now, we anticipate them coming up again during public review and comment for the BART determination and the overall Regional Haze Plan.

1. Ecology wants to add an evaluation of the economics of using a lower sulfur containing fuel in the TSD. Would you supply costs for available lower sulfur fuels, including low sulfur (0.05%) and ultra low sulfur (15 ppm) diesel? All we need is your expected cost per barrel or per gallon, and we can do a new cost analysis similar to the Low Sulfur Fuel Cost Effectiveness Summary in Appendix D of PTPC's BART Analysis and Determination report.
2. The argument given for technical infeasibility for use of a wet scrubber for control of SO<sub>2</sub> from the Recovery Furnace in Section 10.3.2.1 of your BART analysis needs to be revised. Ecology found that wet scrubbers have been operating on at least three recovery furnaces in the northwest since the mid 1980s (two at Camas, one at Longview Fibre). There are indications in the available information that there are other SO<sub>2</sub> scrubber installations at other mills around the country. Please revise PTPC's Recovery Furnace BART analysis to include evaluation of a wet scrubber control option installation.

Here is additional information on the two Camas scrubbers: Cross flow scrubbers with a 3-section design were installed on the two Fort James (also named James River, now Georgia Pacific) recovery furnaces for heat recovery before the mid 1980s. The flue gas coming from the recovery furnace contains considerable heat that can be used to generate hot water. The cross flow scrubber removes some of the sulfur dioxide (enough to meet an SO<sub>2</sub> limit of 10 ppm), hydrogen chloride, TRS, and about half of the particulate remaining after the ESP. This makes the scrubbers both a heat recovery device and an air pollution control device.



Fort James decided to expand its pulping capacity in the late 1980s. This required both scrubber systems to go through PSD/NOC permitting (PSD 88-3 and Order No. DE-88-360 issued in 1989). In 1991, a new ESP replaced the old one on the #3 Recovery Furnace (RF #3), and a packed bed AirPol scrubber replaced the old venturi and Teller scrubbers. RF #4 kept its Teller scrubber.

3. Ecology had indicated earlier that PTPC could use a 0.5 ppm ammonia background concentration for the modeling of the impacts of PTPC's emissions on Class I areas to see if it helped to model out of BART. Since this did not occur, we would like to present the visibility impacts modeled with an ammonia background concentration of 17 ppb as recommended in the 3-state/EPA modeling protocol. This will make the PTPC modeling consistent with other BART modeling in Washington. We do not believe the change in the visibility impacts will affect the draft BART determination.

Ecology is not requesting PTPC write a new report or produce new tables with visibility metrics. We do request that PTPC supply revised Calpost output (\*.lst) files for 2003-2005 to us. We will extract the necessary information from the .lst files to determine the visibility output.

The reanalysis can be done with a partial rerun of the original modeling. We request that PTPC:

- Follow the procedures below for the "Refined baseline (BART100)," "Controls on Power Boiler #10 (BART101)," and "Controls on Lime Kiln (BART102)" cases.
- Rerun POSTUTIL with an ammonia background of 17ppb. This does not require CALPUFF to be rerun and only needs to be done for the Olympic National Park Class I area. The only change to the original POSTUTIL input file would be setting the BCKNH3 value to 17.
- Rerun Calpost after rerunning POSTUTIL. The previously used input file can be used with no modifications.

If there are any questions about these three requests, feel free to contact:

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Sincerely,



Robert C. Burmark, P.E.  
Environmental Engineer

rcb/te

cc: Aaron Day, Trinity Consultants  
Jeff Johnston, Ecology