

**WASHINGTON STATE DEPARTMENT OF ECOLOGY  
POST OFFICE BOX 47600  
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**IN THE MATTER OF:**

<b>Longview Fibre Paper and Packaging, Inc.</b>	]	<b>PSD No. 01-03, Second Amendment</b>
<b>P.O. Box 639</b>	]	
<b>Longview, Washington 98632</b>	]	<b>Temporary Revision</b>

Pursuant to the United States Environmental Protection Agency (EPA) regulations for the Prevention of Significant Deterioration (PSD) set forth in Title 40, Code of Federal Regulations, Part 52 and regulations set forth in the Washington Administrative Code 173-400-700 through 750, the Washington State Department of Ecology (Ecology) is proposing issuance of a temporary revision to PSD 01-03, Second Amendment. Based on the request and supporting materials from Longview Fibre Paper and Packaging, Inc. (LFPP) and Ecology's investigative information used in developing the PSD permit, Ecology now finds the following:

**FINDINGS**

1. On January 29, 2010, LFPP submitted a request for a variance from the Operating Limits for Recovery Furnace #22 (RF #22) and Smelt Dissolving Tank #22 (SDT #22). RF #22 and SDT #22 work in tandem. Molten material from RF #22 is collected in SDT #22 as part of the chemical recovery process which allows reuse of chemicals within the mill. The units each have a current operating limit of 1950 TBLS/day (tons of black liquor solids per day), 30-day average, included in Prevention of Significant Deterioration Permit (PSD) 01-03, Second Amendment and Air Operating Permit (AOP) 000007-8 (PSD Conditions 1.21 and 1.45, and AOP Conditions A4.8 and B4.7).
2. LFPP is preparing an application for permitting of a large project, which includes increasing the capacity of RF #22 and SDT #22.
3. The company has requested temporary operation of a specific project. The project is to operate RF #22/SDT #22 at a rate exceeding the current permit rate in exchange for not operating RF #19/SDT #19 during the temporary period. The purpose of the temporary project is to investigate what the actual TBLS/day capacity of RF #22/SDT #22 is and to evaluate the effects of a higher monthly operating rate on currently installed air pollution control equipment.
4. Operation of only one of these two recovery furnaces will result in reductions in total emissions compared to operating both recovery furnaces to meet production needs.
5. The request from the company is to allow the increase for a limited period of time, ending on either the date of issuance of permit(s) authorizing a higher production rate in the RF #22/SDT #22 system or one calendar year after issuance of the variance, whichever occurs earlier.

6. Current emission rate limits in the PSD and AOP permits, such as parts per million and pound/Ton Black Liquor Solids (TBSL) limits, would remain in effect.
7. LFPP has evaluated the effect of increasing the monthly average black liquor solids throughput in RF #22 to 2160 TBSL/day, 30-day average, and determined that there was not a significant increase in any new source review regulated pollutant. Ecology evaluated an increase of up to 2640 TBSL/day, 30-day average, and determined that this rate would also not result in a significant increase in emissions.
8. Ecology has determined that the proposal will result in a net reduction in emissions of all pollutants except for particulate matter (PM), particulate matter less than 10 microns (PM<sub>10</sub>), and nitrogen oxides (NO<sub>x</sub>). The emission increases in PM/PM<sub>10</sub> and NO<sub>x</sub> are not PSD significant emission increases.
9. For the equipment testing activity proposed by the company, Ecology has determined that a shorter period is appropriate for the length of the permit revision. Ecology proposes the temporary operation to end on the earlier of November 1, 2010, when a physical change to the facility to accommodate or allow a higher black liquor solids throughput, or an application for a Notice of Construction or PSD permit allowing for modification to the facility is determined to be complete.
10. Ecology has evaluated the appropriateness of the request from LFPP and has determined the following approval conditions are appropriate to restrict the scope and duration of the temporary permit revision requested by the company.

## **APPROVAL CONDITIONS**

Based on the above and the technical analysis performed by Ecology, PSD 01-03, Second Amendment is revised with the following Approval Conditions:

1. Conditions 1.21 and 1.45, in PSD 01-03, Second Amendment applicable to Recovery Furnace #22 (RF #22) and Smelt Dissolving Tank #22 (SDT #22) are modified to be a monthly average throughput of 2,640 TBSL/day, 30-day average, provided all other conditions of this revision are met. All other emission limitations contained in PSD 01-03, Second Amendment in Conditions 1.22–1.26 and 1.46–1.50 applicable to RF #22/SDT #22 remain in effect.
2. No physical changes to RF #22/SDT #22 or any supporting equipment such as black liquor concentrators, pumps, pipes, etc., pulp processing or paper making equipment can be made to allow for the increased throughput.
3. LFPP must conduct PM source tests at least monthly at RF #22 and SDT #22 for any month when the units operate at least five (5) consecutive days at rates in excess of 1950 TBSL/day, 30-day average. The source tests must be conducted while the units are operating at a rate approximating the peak operational rate during the month.



