



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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October 20, 2010

Mr. Roger Loney
Port Townsend Paper Corporation
P.O. Box 3170
100 Mill Road
Port Townsend, WA 98368

Dear Mr. Loney:

Regional Haze Best Available Retrofit Technology (BART) Determination

Best Available Retrofit Technology (BART) is required to reduce the regional haze impacts of emissions of your facility. The enclosed Order #7839, Revision 1, contains our BART determination for your facility revised as requested in your September 27, 2010 comments on the Washington Regional Haze Plan.

The primary purpose of the revision is to allow substitution of the currently required emissions monitoring recordkeeping and reporting procedures with methods that Ecology determines would provide equal or better information on emissions and compliance status. The substituted requirements have to be contained in a regulatory order issued by Ecology.

The secondary purposes are to incorporate the revised monitoring and recordkeeping requirements contained in Order DE 05AQIS-2892, First Modification, and to substitute the new modified order for the now rescinded original order.

Ecology considers these changes to be administrative in nature.

If you have questions or requests relating to this order, please contact Alan Newman at (360) 407-6810 or alan.newman@ecy.wa.gov.

Sincerely,

Jeff Johnston, Ph.D.
Manager, Science and Engineering Section
Air Quality Program

AN:lb

Enclosure



Mr. Roger Loney
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cc: Marc Heffner, Industrial Section
Eveleen Muehlethaler, Port Townsend Paper
Alan Newman, Ecology
Commenters on the proposed BART Order

**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

IN THE MATTER OF AN]
ADMINISTRATIVE ORDER AGAINST:]

Port Townsend Paper Corporation]

ORDER NO. 7839, Revision 1

TO: Mr. Roger Loney
Port Townsend Paper Corporation
PO Box 3170
100 Mill Road
Port Townsend, WA 98368

This is an Administrative Order requiring your company to comply with WAC 173-400-151 by taking the actions that are described below. Chapter 70.94 RCW authorizes the Washington State Department of Ecology's Air Quality Program (Ecology) to issue Administrative Orders to require compliance with the requirements of Chapter 70.94 RCW and regulations issued to implement it.

Ecology has determined that portions of your facility are subject to the provisions of the federal and state visibility protection program (WAC 173-400-151 and 40 CFR Part 51, Subpart P). The rules require that the State determine what technologies and level of emission control constitutes Best Available Retrofit Technology (BART) for the eligible emission units at your facility.

FINDINGS

- A. The Port Townsend Paper Corporation (PTPC) is a Kraft pulp and paper mill subject to BART.
- B. The BART-eligible emission units at PTPC are the Recovery Furnace, the Smelt Dissolving Tank, the No. 10 Power Boiler, and the Lime Kiln.
- C. Emissions from BART units are controlled by:
 - a. Use of an electrostatic precipitator (ESP) to control PM/PM₁₀ emissions from the non-direct contact evaporator (NDCE) Recovery Furnace.
 - b. Use of a wet scrubber to control PM/PM₁₀ and SO₂ emissions from the Smelt Dissolving Tank.
 - c. Use of a multiclone and wet scrubber for control of PM/PM₁₀ emissions from the No. 10 Power Boiler.

- d. Use of a wet venturi scrubber to control PM/PM₁₀ and SO₂ emissions from the Lime Kiln.
- D. Ecology has determined that the emission controls currently installed at PTPC meet the requirements of BART.
- E. Ecology has determined that PTPC has met the requirements of Administrative Order No. #5072, First Amendment, which required submittal of a BART Technical Analysis for the PTPC facility.
- F. On September 27, 2010 Port Townsend Paper submitted comments on the Washington State Proposed Regional Haze State Implementation Plan. The comments requested a revision to this Order to reflect the April 20, 2010 revision to Consolidated Order DE 05AQIS-2892 and to clarify that the company could choose to implement alternatives, such as continuous emission monitoring, to the currently required EPA Reference Method stack testing. This revision incorporates the company request. Ecology has reviewed the request and concur that the changes are acceptable and nonsubstantive.

Additional information and analysis is available in the BART Determination Support Document for Port Townsend Paper Corporation, Port Townsend, Washington, prepared by the Washington State Department of Ecology, October 2008, and the Best Available Retrofit Technology Applicability Analysis and Determination Report for Port Townsend Paper Corporation, Port Townsend, Washington, prepared by Trinity Consultants on behalf of Port Townsend Paper Corporation, December 2007.

YOU ARE ORDERED: To operate existing emission control equipment for the Recovery Furnace, Smelt Dissolver Tank, Lime Kiln, and No. 10 Power Boiler in accordance with the following conditions:

1. BART Emission Limitations
 - 1.1. Meet the emission limitations for particulate matter, nitrogen oxides, and sulfur dioxide found in Order DE 05AQIS-2892, First Modification, issued to the Port Townsend Paper Corporation on April 20, 2010, by the Washington State Department of Ecology's Industrial Section.
 - 1.2. Meet the SO₂ and NO_x limitations in PSD-I issued June 1, 1984.
 - 1.3. Compliance will be determined as specified in Order DE 05AQIS-2892, First Modification.
2. Schedule for Compliance

2.1. Compliance with the emission limitations for particulate matter, nitrogen oxides, and sulfur dioxide is required upon the effective date of this Order.

3. Monitoring and Recordkeeping Requirements

3.1. Monitoring and recordkeeping requirements for particulate matter, nitrogen oxides, and sulfur dioxide are contained in Order No. DE 05AQIS-2892, First Modification.

4. Reporting Requirements

4.1. Reporting requirements for particulate matter, nitrogen oxides, and sulfur dioxide are contained in Order No. DE 05AQIS-2892, First Modification.

5. Ecology may, by regulatory order, revise the monitoring, reporting and recordkeeping requirements specified in this order. The revised monitoring, reporting or recordkeeping methods must provide equal or better information on the compliance status of the source or emission unit subject to the revised monitoring, reporting or recordkeeping methods.

Failure to comply with this Order may result in the issuance of civil penalties or other actions, whether administrative or judicial, to enforce the terms of this Order.

You have a right to appeal this Order. To appeal you must:

- File your appeal with the Pollution Control Hearing Board within 30 days of the “date of receipt” of this document. Filing means actual receipt by the Board during regular office hours.
- Serve your appeal on the Department of Ecology within 30 days of the “date of receipt” of this document. Service may be accomplished by any of the procedures identified in WAC 371-08-305(10). “Date of receipt” is defined at RCW 43.21B.001(2).

If you appeal you must:

- Include a copy of this document with your Notice of Appeal.
- Serve and file your appeal in paper form; electronic copies are not accepted.

To file your appeal with the Pollution Control Hearing Board:

Mail appeal to:

The Pollution Control Hearings Board
P.O. Box 40903
Olympia, WA 98504-0903

OR

Deliver your appeal in person to:

The Pollution Control Hearings Board
4224-6th Avenue SE Rowe Six, Bldg 2
Lacey, WA 98503

To serve your appeal on the Department of Ecology:

Mail appeal to:

The Department of Ecology
Appeals Coordinator
P.O. Box 47608
Olympia, WA 98504-7608

OR

Deliver your appeal in person to:

The Department of Ecology
Appeals Coordinator
300 Desmond Drive SE
Lacey, WA 98503

And send a copy of your appeal packet to:

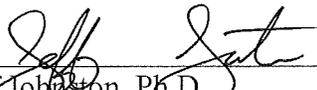
Alan Newman
Department of Ecology
Air Quality Program
P.O. Box 47600
Olympia, WA 98504-7600

For additional information, go to the Environmental Hearings Office website at <http://www.eho.wa.gov>.

To find laws and agency rules, go to the Washington State Legislator website at <http://www1.leg.wa.gov/CodeReviser>.

Your appeal alone will not stay the effectiveness of this Order. Stay requests must be submitted in accordance with RCW 43.21B.320. These procedures are consistent with Chapter 43.21B RCW.

DATED this 20 day of October, 2010 at Olympia, Washington.



Jeff Johnston, Ph.D.
Manager, Science and Engineering Section
Department of Ecology
Air Quality Program

