STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
*PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000*
*711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341*

July 7, 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 contains our BART determination for your facility including a schedule for compliance.

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

jj/te

Enclosure

By certified mail

cc: Marc Heffner, Industrial Section
Eveleen Muehlethaler, Port Townsend Paper
Alan Newman, Ecology

**STATE OF WASHINGTON**
**DEPARTMENT OF ECOLOGY**

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| IN THE MATTER OF AN ADMINISTRATIVE ORDER AGAINST:<br><br>Port Townsend Paper Corporation | ]<br>]<br>]<br>]<br>] | ORDER NO. 7839 |

TO: Mr. Roger Loney
Port Townsend Paper Corporation
P.O. 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 $PM/PM_{10}$ emissions from the non-direct contact evaporator (NDCE) Recovery Furnace.

   b. Use of a wet scrubber to control $PM/PM_{10}$ and $SO_2$ emissions from the Smelt Dissolving Tank.

   c. Use of a multiclone and wet scrubber for control of $PM/PM_{10}$ emissions from the No. 10 Power Boiler.

d. Use of a wet venturi scrubber to control $PM/PM_{10}$ and $SO_2$ 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.

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, issued to the Port Townsend Paper Corporation on August 10, 2006, by the Washington State Department of Ecology's Industrial Section.

   1.2. Meet the $SO_2$ and $NO_X$ limitations in PSD-I issued June 1, 1984.

   1.3. Compliance will be determined as specified in Order DE 05AQIS-2892.

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.

4. Reporting Requirements

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

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 7 day of July, 2010 at Olympia, Washington.

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