



DEPARTMENT OF  
**ECOLOGY**  
State of Washington

**DRAFT TECHNICAL SUPPORT DOCUMENT  
(TSD) FOR LONGVIEW FIBRE PAPER AND  
PACKAGING, INC. DBA KAPSTONE KRAFT  
PAPER CORPORATION**

**PSD PERMIT NO. 01-03, AMENDMENT 3**

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**Prepared by**

**Air Quality Program  
Washington State Department of Ecology  
Olympia, Washington**

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## **1. EXECUTIVE SUMMARY**

Prevention of Significant Deterioration (PSD) permits, required by state and federal law, are for projects that may significantly increase air pollution. Ecology prepares PSD permits for industrial sources of air pollution.

The KapStone Longview mill's PSD permit has been amended twice. This third permit amendment includes the following changes:

- change the facility name to the company's new name;
- allow the option to model fine particle (PM<sub>10</sub>) air emissions instead of air monitoring;
- remove closed equipment (a recovery furnace, a smelt dissolver tank, two lime kilns, a power boiler, and a cogeneration engine) from the permit.

This third amendment will not change the previous two amendments.

## **2. INTRODUCTION**

### **2.1. The Permitting Process**

PSD permitting requirements in Washington State are established in Title 40, Code of Federal Regulations (CFR) § 52.21; Washington Administrative Code (WAC) 173-400-700 through 750; and the agreement for the delegation of the federal PSD regulations by the United States Environmental Protection Agency (EPA) to Ecology, dated December 10, 2013.

The objective of the PSD program is to prevent significant adverse environmental impact from emissions into the atmosphere by a proposed new major source, or a major modification to an existing major source. The program limits degradation of air quality to that which is not considered "significant." PSD rules require the utilization of Best Available Control Technology (BACT) for certain new or modified emission units, which is the most effective air pollution control equipment and procedures that are determined to be available after considering environmental, economic, and energy factors.

The PSD rules must be addressed when a company is adding a new emission unit or modifying an existing emission unit in an attainment or unclassifiable area. PSD rules apply to pollutants for which the area is classified as attainment or unclassifiable with the National Ambient Air Quality Standards (NAAQS). PSD rules are designed to keep an area with "good" air in compliance with the NAAQS. The distinctive requirements of PSD are BACT, air quality analysis (allowable increments and comparison with the NAAQS), and analysis of impacts of the project on visibility, vegetations, and soils.

## **2.2. Site and Project Description**

### **2.2.1. Site Description**

The KapStone Longview mill is an integrated Kraft and neutral sulfite semi-chemical (NSSC) pulp and paper facility in Cowlitz County, Washington, near the city of Longview. The facility is located at 300 Fibre Way, Longview, Washington 98632. The Columbia River borders the facility to the south. KapStone is located in a Class II area that is designated as “attainment or unclassifiable” for the purpose of PSD permitting for all pollutants.

### **2.2.2. Facility Description**

The KapStone Longview mill primarily operates five paper machines, dependent on market conditions demand. Pulp types are blended at the paper machines to create products meeting customer specifications. The mill produces both virgin pulp and recycled pulp. Virgin pulping units include two Kamyr continuous digesters and one M & D continuous sawdust cooker which use the Kraft process, and one Sunds digester which uses the neutral sulfite semi chemical (NSSC) process. Recycled pulp is made at an old-corrugated-container (OCC) recycling plant and double-lined Kraft (known as DLK). Bleached market pulp is purchased as necessary for production. The facility does not have a bleaching plant.

Major emission units at the facility include paper machines, recovery furnaces, power boilers, lime kilns and smelt dissolving tanks.

## **2.3. Permit Amendment 3**

Overview: KapStone has requested Ecology amend their PSD Permit No. 01-03 to update the permit with the company’s new dba name, add a modeling option for Approval Condition 12, and remove retired emission units from the permit.

A KapStone letter dated November 27, 2013, and received by Ecology on December 3, 2013, requested the addition of a modeling option to Approval Condition 12, and the company’s name change. The next submittal was the PM<sub>10</sub> Monitoring Condition Change submitted on May 14, 2014. The final supplementary information of retired emission units was submitted in a letter dated November 4, 2014, and sent by e-mail on November 6, 2014. The application was originally considered complete on August 13, 2014.

Name change: Amendment 3 changes the company’s name from Longview Fibre Paper and Packaging, Inc. to reflect the use of its dba name KapStone Kraft Paper Corporation resulting from the sale of the facility.

Adding proposed modeling protocol as an option to ambient monitoring in Approval Condition 12: The permit required the facility to submit to Ecology a monitoring plan for PM<sub>10</sub>. As a minimum, the monitoring plan was required to satisfy the guidelines in the latest edition of

Ambient Monitoring Guidelines for Prevention of Significant Deterioration (PSD) (U.S. Environmental Protection Agency, Research Triangle Park, EPA Publication No. EPA-450/4-87-007, May 1987 or latest revision).

The facility submitted their draft post-construction PM<sub>10</sub> Post-Construction Ambient Monitoring Quality Assurance Project Plan (QAPP) in June 2002. The final QAPP was submitted in January 2003. The final QAPP, in Section 5.2 schedule of activities Table 5.2, stated:

“Commencement of sampling will occur within 180 days of when LFCo’s quarterly order projections are 20 % greater than the most recent five (5) year primary production totals (i.e., 3,218 tons per day)...”

The present capacity of the mill is approximately 3,000 tons per day (TPD). The facility expects to reach the 3,218 TPD in the near future.

The facility has requested a modeling option be added to the permit. A modeling protocol was submitted to Ecology. The modeling protocol was reviewed by Ecology, and found to be an acceptable option.

Amendment 3 adds the option for KapStone to model their air emissions instead of conducting ambient air monitoring.

For the existing ambient air monitoring option, KapStone must monitor PM<sub>10</sub> consistent with the terms in the January 2003 QAPP, or with revisions as approved by Ecology. Sampling will be considered to have commenced upon start-up of the ambient monitor at the Ecology and KapStone agreed upon location. Monitoring will proceed for two years, after which, if the monitoring results show one or fewer days greater than 150 µg/m<sup>3</sup> for a 24-hour average or 50 µg/m<sup>3</sup> for an annual average for PM<sub>10</sub>, then KapStone will have met all requirements of this condition.

For the modeling option, KapStone will conduct PM<sub>10</sub> modeling demonstrating compliance with the 150 µg/m<sup>3</sup> 24-hour PM<sub>10</sub> NAAQS. The modeling will be conducted following an Ecology-approved modeling protocol. Sampling will be considered to have commenced upon submittal of the protocol. If the modeling demonstrates compliance with the 150 µg/m<sup>3</sup> 24-hour PM<sub>10</sub> NAAQS, then KapStone will have met all requirements of this condition. If the modeling results do not demonstrate compliance, KapStone shall commence ambient monitoring within six months of the date Ecology was notified that the modeling results did not demonstrate compliance.

Remove closed emission units from PSD Permit No. 01-03: KapStone provided documents, such as correspondence and orders, that demonstrated emission units were closed. These documents confirmed that following emission units have been permanently retired. Therefore, the following retired emission units from PSD Permit No. 01-03 were removed from Amendment 3.

- Recovery Furnace 15
- Smelt Dissolver Tank 15
- Lime Kiln 1
- Lime Kiln 2
- Power Boiler 12
- Cogen 23

In addition, Power Boiler 13 was also removed from the permit as part of Amendment 3. Notice of Construction Order No. 8429 requires that the facility permanently retire Power Boilers 12 and 13 within 120 days of placing the modified Power Boiler 20 into operation. Modified Power Boiler 20 was placed into operation on October 11, 2014. Power Boiler 12 has already been retired. Power Boiler 13 must be retired by February 8, 2015, because the facility has already modified Power Boiler 20 and put it into operation. The facility has been working toward this goal, and the boiler will be permanently retired. Amendment 3 reflects this closure of Power Boiler 13, and removes this boiler from the permit.

### **3. PUBLIC INVOLVEMENT**

There will be a 30-day public comment period, and a public hearing may be scheduled if Ecology finds there is public interest in regards to the permit amendment. All comments received will be considered, and may result in changes that will be incorporated into the final permit amendment.

This PSD permitting action is subject to a minimum 30-day public comment period under WAC 173-400-740. A newspaper public notice announcing the public comment period was published in The Daily News on March 2, 2015. In accordance with WAC 173-400-740(2)(a), application materials and other related information were made available for public inspection at:

Longview Public Library  
1600 Louisiana Street  
Longview, WA 98632

Washington State Department of Ecology  
Air Quality Program  
300 Desmond Drive SE  
Lacey, WA 98503

The 30-day public comment period will close on April 2, 2015.

### **4. AGENCY CONTACT**

Marc Crooks, P.E.  
Washington State Department of Ecology  
Air Quality Program  
P.O. Box 47600  
Olympia, WA 98504-7600  
(360) 407-6803  
[marc.crooks@ecy.wa.gov](mailto:marc.crooks@ecy.wa.gov)