

**SUPPORT DOCUMENT ADDENDUM**

**2/15/08**

(lfpp07supDDDDDadnfnl.DOC)

**for the Air Operating Permit No. WA 000007-8 issued to**

**Longview Fibre Paper and Packaging, Inc.**

**P.O. Box 639**

**Longview, WA. 98632**

State of Washington  
DEPARTMENT OF ECOLOGY  
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## CHANGES MADE

### A. MACT Requirements (DDDDD)

Maximum Achievable Control Technology (MACT) for power boilers (40 CFR Part 63, Subpart DDDDD – commonly referred to as “Boiler MACT”) were included in the AOP issued on February 23, 2007. This modification removes the Boiler MACT requirements from the AOP.

Boiler MACT requirements are being removed from the AOP in response to a court decision. An August 23, 2007 letter from Stuart A. Clark (Program Manager of the Ecology Air Quality Program) to Carol Kraege (Section Head of the Ecology Industrial Section) provides explanation. The letter reads in part:

The purpose of this letter is to inform you of recent developments with the vacatur of the Power Boiler MACT standard (40 CFR 63 subpart DDDDD).

As you may know, the United States Court of Appeals for the District of Columbia decided on June 8, 2007 concerning both the Commercial Industrial and Solid Waste Incinerator Emissions Guidelines (40 CFR 60 subparts CCCC and DDDD) and the Boiler MACT standard. The court found the rules divided sources into “unlawful” categories.

Prior to this court decision, Ecology had incorporated the provisions of these federal rules into Chapter 173-400 WAC. We believe the requirements of 40 CFR 63 subpart DDDDD vacated by the court no longer exist as a matter of state law.

Provisions of these federal rules and the related state rules were also incorporated into many Air Operating Permits. Because the basis of authority for the Power Boiler MACT has been removed, we believe the related permit conditions are no longer valid.

Ecology recognizes the need to revise the state rule and to revise Air Operating Permits that contain provisions that refer to these above mentioned subparts of the federal rules. We will work to revise these rules and to revise the permits. ...

LFPP requested permit modifications be due to the federally vacated regulation. In response to the court decision and LFPP request, the following changes are being made to the AOP:

1. Section N (Power Boiler MACT) and references to section N are removed.
2. Permit conditions citing 40 CFR Part 63, Subpart DDDDD as the applicable requirement are removed. Those conditions included D1.10&11 for Power Boiler (PB) 12, D2.10&11 for PB 13, and D4.9&10 for PB 20 in the AOP issued on February 23, 2007.
3. References to 40 CFR Part 63, Subpart DDDDD from Section I – Compliance Assurance Monitoring (CAM) are removed.
4. References to DDDDD are removed for Section J – NESHAP SSM Plan, Recordkeeping, and Reporting.
5. Other miscellaneous references to DDDDD are removed.

### **B. Compliance Assurance Monitoring (CAM)**

CAM requirements, per 40 CFR Part 64, for specific parameters and units are identified in Section I of the AOP. Specific monitoring requirements are included with the appropriate unit specific section of the AOP. Section I notes the specific section in the AOP where each CAM requirement is addressed.

The LFPP CAM Plan was submitted along with the AOP application. The plan called for meeting CAM for PM (particulate) emissions from PBs 12, 13, and 20 by meeting DDDDD monitoring requirements. The February 23, 2007 AOP included CAM requirements for PBs 12, 13, & 20 based on DDDDD requirements.

As part of the AOP modification request, LFPP updated their CAM Plan for PBs 12, 13, & 20 PM emissions to satisfy CAM in the absence of DDDDD. The revisions to CAM are incorporated into the AOP modification in Section I and the appropriate unit specific sections.

### **C. Administrative Changes**

Two typographical errors of note are being corrected. They are:

1. The title of appendix ApA.4 is corrected to “PB & Cogen” replacing “RF, SDT, & LK.”
2. Improper references to appendix ApA.3 in sections D.1, D.2, D.3, D.4, and E.1 are corrected to refer to appendix. ApA.4.

Also, Appendix C, the Emission Control Compliance Demonstration Plan, is being updated with the most current Parameter Summary Table.

## **APPENDIX A - ACRONYMS USED IN THE SUPPORT DOCUMENT ADDENDUM**

AOP - air operating permit

CAM - compliance assurance monitoring

LFPP - Longview Fibre Paper and Packaging, Inc.

LK – lime kiln

MACT - maximum achievable control technology

PB - power boiler

PM - particulate matter

RF – recovery furnace

SDT – smelt dissolving tank

WAC - Washington Administrative Code

## **APPENDIX B - RESPONSE TO COMMENTS**

No formal comments were received. LFPP noted the following clerical mistakes in the draft air operating permit document.

1. Section D1.1 contains the statement "See Footnote D1.F1 for CAM requirements". This reference is incorrect; it should instead be "D1F.1".
  - 1a. Sections D2.1 and D4.1 are similar, in that the references need to be changed to "D2F.1" and "D4F.1", respectively.
2. Footnotes D2F.3 and D4F.3 contain the statement "Continuously monitor parameters specified in the plan after 9/17/07. Prior to 9/17/07 monitor and log plenum pressure and log weir flow once every 4 hours." This requirement is no longer applicable; it should instead read "Continuously monitor parameters specified in the plan." (See Footnote D1F.3 for a correct rendering.)

The mistakes are corrected in the final document.