

Weyerhaeuser Longview Air Operating Permit (AOP) Support Document

Ecology Support Document

Source Information

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County: Cowlitz
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Permitting Authority Information

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1.0 List of Abbreviations and Acronyms

Btu	British thermal units
BLS	Black Liquor Solids
CAA	Clean Air Act [42 U.S.C. section 7401 et seq.]
CAM	Compliance assurance monitoring
CEMS	Continuous emission monitoring system
CFR	Code of Federal Regulations
CO	Carbon monoxide
COMS	Continuous opacity monitoring system
CO ₂	Carbon dioxide
dscf	Dry standard cubic feet
Ecology	Washington State Department of Ecology
EPA	United States Environmental Protection Agency
ESP	Electrostatic Precipitator
EU	Emission unit
gr/dscf	Grains/dry standard cubic foot (7,000 grains = 1 pound)
HAP	Hazardous air pollutant
HCL	Hydrochloric acid
hr	Hour
HSC	High Solids Crystallizer
IEU	Insignificant emission unit
kpph	Thousand pounds per hour
lb	Pound
MACT	Maximum Achievable Control Technology
mm	One million
mmbtu	Million Btu
NCG	Non-condensable gases
NESHAP	National Emission Standards for Hazardous Air Pollutants (40 CFR Parts 61 and 63)
NOC	Notice of Construction
NOx	Oxides of nitrogen
NSPS	New source performance standards
O ₂	Oxygen
PM	Particulate matter
PM ₁₀	Particulate matter with an aerodynamic diameter equal to 10 microns or less
ppmdv	Parts per million, on a dry volume basis
PS1	Performance Specification 1 (40 CFR Part 60, Appendix B)
PSD	Prevention of significant deterioration
PTE	Potential to emit
SCR	Selective catalytic reduction
SO ₂	Sulfur dioxide
SOx	Oxides of sulfur
tph	Tons per hour
tpy	Tons per year
VOC	Volatile organic compound
WAC	Washington Administrative Code

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2.0 Introduction

This document, the support document, summarizes the legal and factual basis for the permit conditions in the air operating permit issued by the Washington State Department of Ecology to the source. Unlike the air operating permit, this document is not legally enforceable. This support document summarizes the emitting processes at the facility, air emissions, permitting and compliance history, the statutory or regulatory provisions that relate to the facility, and the steps taken to provide opportunities for public review of the permit. The Permittee is obligated to follow the terms of the permit. Any errors or omissions in the summaries provided here do not excuse the Permittee from the requirements of the permit. This Operating Permit Support Document fulfills the operating permit rule "Statement of Basis" requirement and explains particular portions of the air operating permit for the Weyerhaeuser NR Company. This document is not part of the operating permit for Weyerhaeuser NR Company's Longview facility. It is important to note that the Weyerhaeuser Company notified Ecology by a letter dated November 13, 2008, that the Weyerhaeuser Company had formed a new wholly owned subsidiary, Weyerhaeuser NR Company, to own and operate the Weyerhaeuser Longview mill operations. Weyerhaeuser Company is the sole owner of the new Weyerhaeuser NR Company. This transfer of property ownership did not trigger real estate sales taxes. There is no third party interest involved.

Nothing in this document is enforceable against the Permittee, unless otherwise made enforceable by permit or order.

3.0 Permit Authority

Title V of the Federal Clean Air Act Amendments required all states to develop a renewable operating permit program for industrial and commercial sources of air pollution. The Washington State Clean Air Act (RCW 70.94 Revised Code of Washington) was amended in 1991 and 1993 to provide the Department of Ecology and Local Air Agencies with the necessary authority to implement a state-wide operating permit program. The law requires all sources emitting one hundred tons or more per year of a criteria pollutant, ten tons of a hazardous air pollutant, or twenty-five tons in the cumulative of hazardous air pollutants, to obtain an operating permit. Criteria pollutants include sulfur dioxide (SO₂), nitrogen oxides (NO_x), particulate matter (PM), carbon monoxide (CO), and volatile organic compounds (VOC).

Chapter 173-401 of the Washington Administrative Code (WAC), which specified the requirements of Washington State's Operating Permit Regulation, became effective November 4, 1993. United States Environmental Protection Agency (EPA) granted Washington's program interim approval December 9, 1994. Final approval of Washington's program was granted on August 13, 2001. The current version of the regulation was filed on September 16, 2002.

The Permittee is currently subject to many regulatory orders. A list of the orders and permits are listed in Appendix D of the permit itself. An important issue regarding any Title V permit is the basis of authority for the applicable requirements. This is particularly true regarding monitoring and reporting

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requirements. The basis of authority is used to determine federal or state-only applicability. Many of the applicable requirements come from orders issued by Ecology. The period of time during which these various orders were issued spans decades.

Early on in the permitting process, Ecology attempted to sort out the regulatory basis for the orders. Ecology determined that this was not possible. Many of the orders originated years ago and the basis of authority was not clearly set forth at the time of issuance. In addition, order consolidation has gone on in the past further confusing the original basis of authority.

Ecology decided the effort, besides being difficult, was not necessary as WAC 173-401-615 offered a solution to this problem. With the Permittee's agreement in the case of Weyerhaeuser, the issue of state-only or federal applicability was put aside as it was agreed to rely entirely on WAC 173-401-615 as the basis of authority for the type and frequency of monitoring. WAC 173-401-615 requires monitoring and recordkeeping sufficient to assure compliance with the terms and conditions of the permit. This regulation is federally enforceable. Monitoring and recordkeeping requirements based on this regulation are federally enforceable.

4.0 Facility Information

The Weyerhaeuser Longview facility is located in Longview, Washington. The facility's street address is 3401 Industrial Way, and the mailing address is Post Office Box 188, Longview, Washington 98632. There is a long history of pulp, paper, and wood products manufacturing at the site, with the first sawmill operations beginning in 1929. Pulping activities began with the establishment of a sulfite pulp mill in 1931. The mill is located near the intersection of Industrial Way and Washington Way, on the shore of the Columbia River just downstream of the Lewis and Clark Bridge. The source includes integrated pulp and paper manufacturing facilities, and lumber products manufacturing facilities. The facility normally operates seven days a week and 24 hours a day.

The Longview pulp and paper complex is in the SIC Major Group 22. It is an integrated pulp and paper manufacturing facility. Pulp is made from raw and secondary fiber materials. The mill produces a wide range of paper products that includes wetlap pulp, bleached paperboard products, newsprint, and publication papers, and other intermediate and finished pulp and paper products. A Kraft pulp mill and bleach plant produces bleached Kraft pulp. Bleached pulp is processed on site in the integrated bleached paperboard machine (L3 Machine), primarily for the production of liquid packaging board, and in the Wetlap Pulp Machine, for production of Wetlap market pulp. Bleached Kraft slush pulp is also sent to NORPAC as feedstock for on-site production of newsprint and publication papers. The Fine Paper machines were shut down in 2001 and 2003, and are permanently out of service. The NORPAC facility produces newsprint using thermomechanical pulp; deink pulp from old newsprint; and bleached Kraft fiber. Specifically, NORPAC I produces thermo-mechanical paper and non-integrated fine paper. NORPAC II produces thermo-mechanical paper and non-integrated fine paper. NORPAC III produces thermo-mechanical paper, newsprint de-ink, and non-integrated fine paper.

The Longview Lumber Products facility is in SIC Major Group 24. The facility produces, finishes, stores, and ships dimensional lumber. Dimensional lumber processing facilities at Longview include dimensional lumber dry kilns, planers, anti-sapstain spray treatment systems, lumber storage, shipping facilities, and maintenance support activities.

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A new sawmill was constructed on the site in 2008. The production of the new sawmill feeds the existing planers and kilns at the Longview site. The new sawmill includes the following emission units:

- Band saw and carbide shop (also known as Filing Shop);
- Trimmer saw;
- Residual collection systems for chips and shavings.

The projected actual operating rate of the new sawmill is 500 million board feet (MMbf) per year. The maximum production capacity of the new sawmill will be approximately 550 MMbf per year. The Lumber from the sawmill will be shipped to the planer mill at the Longview Complex, and planed lumber may either be shipped green or dried in the existing onsite lumber drying kilns. The existing planer lines and dry kilns were not modified by the sawmill project. Planer mill production is expected to increase when the sawmill goes to full production.

The sawmill trimmer saw is equipped with a baghouse. BACT for the dust collection system at the Longview sawmill was defined as 0.005 gr/dscf and a baghouse for a control device. Compliance is to be demonstrated by keeping inspection and maintenance records for the baghouses. A source test is required after start-up of the sawmill to confirm the sawmill's emission control system. A particulate emissions source test conducted on November 11, 2008, demonstrated compliance with the emission limit with a baghouse outlet concentration of 0.0007 grains/dscf.

Ecology's review of BACT for dust control from bin load out found that SWCAA approved BACT for bin load out at the Centralia Sawmill permitted in 2006 was two-sided wind shrouds and best management practices. For Weyerhaeuser's Longview facility, Ecology has determined that BACT will be defined as bin dust covers with compliance to be demonstrated by keeping maintenance records for the covers.

BACT for dust control from mobile sources on a gravel surface will be defined as watering with compliance to be demonstrated by keeping log sheets for the watering.

As required by WAC 173-400-720 (4)(b)(iii)(C)(iv), an annual report summarizing emissions information is required within 60 days after the end of the calendar year following resumption of regular operation after the improvements have been completed.

The lumber drying kilns are now considered a major source. Oregon State University research developed new emission factors for the lumber drying kilns that resulted in the kilns redefined as a major source. BACT is current operation and maintaining a logbook of operating temperatures.

Other activities on the site include a solid waste materials recovery and transfer facility (MRF), log storage and sorting, and timberlands support. These operations are minor sources for the purposes of the Operating Permit program.

Steam is generated on site for process use, and for the production of electricity. Some of the steam produced by the boilers is used by turbine generators to produce about 40 MW of electricity. Total electric power consumption at the site is approximately 240 MW. Purchased power is supplied to the site by the Cowlitz County Public Utilities District. The facility draws water from the Columbia River, and

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uses approximately 70 million gallons per day, of which roughly 30 million gallons per day is used for non-contact cooling.

Listed below are the pulp and paper production numbers in air dried tons (ADT) per day for 2008:

Month 2008	Kraft (Unbleached)	Thermomechanical	Deink	Paper
January	1,367	1,677	347	3,666
February	1,362	1,697	307	3,635
March	786	1,852	291	3,226
April	1,352	1,760	276	3,663
May	1,450	1,754	320	3,748
June	1,413	1,861	310	3,833
July	1,411	1,768	284	3,662
August	1,341	1,812	279	3,715
September	1,260	1,708	357	3,586
October	1,266	1,832	271	3,638
November	1,180	1,830	280	3,569
December	1,135	1,626	207	3,247
2008 total	15,323	21,177	3,529	43,189

Tim Haynes is the facility's Vice President – Mill Manager. Brian Wood is the facility's environmental, health and safety manager. Greg Bean is the facility's senior environmental engineer, and primary contact for Clean Air Act compliance.

5.0 Source Description

In addition to recycled fiber, NORPAC uses the Thermo-Mechanical Pulp (TMP) to process wood chips into virgin fiber for use in the three paper machines. The wood chips are received and stored in NORPAC chip silos. The chips are then washed and then pneumatically conveyed to surge bins via four chip cyclones. From the surge bins, the wood chips are fed to the steaming tubes where they are heated with steam. The wood chips are then fed to the primary refiners, bleached using peroxide, and then processed in the secondary refiners. The bleached stock is then screened and stored before being fed to the paper machines.

There are three paper machines at NORPAC. The machines are similar. Pulp from the stock storage chests is blended to obtain the wanted blend of mix of TMP, deink, and bleached Kraft pulp and other filler material. The pulp is sent to the former where the sheet is initially formed. The sheet is then pressed. Natural gas fired air cap dryers blow hot air directly onto the sheet to partially dry the sheet. Steam-heated dryers complete the drying process. Excess pulp suspension from the forming section of the machine is processed through a system of saveall chests and deckers. Each machine has repulping pits under all sections of each machine. Sizing, precipitated calcium carbonate, or other additives can be added to the paper machines. Rolled paper packaging is performed in the roll finishing area.

The Kraft pulping process uses a Kamyr continuous digester system. Chips are conveyed to the chip silos. The chips are then conveyed to the Chip Bin. Chips are fed from the bottom of the Chip Bin to the Chip Presteaming Vessel through a low pressure feeder followed by a high pressure feeder. Presteamed

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chips and white liquor are fed to an impregnation vessel, and from there are fed to the Kamyr continuous digester for delignification (cooking) using white liquor and recirculated black liquor under high pressure and temperature. Spent black liquor is extracted from the pulp and sent to flash tanks for heat recovery, then to the evaporators for chemical recovery. Turpentine is recovered from the flash steam for sale, use as a fuel, or for combustion and chemical recovery of spent pulping chemical (sulfur). There is one emission unit designated for the continuous digesting area. This emission unit is composed of activities associated with the pulping process and includes blow tank emissions, uncaptured process emissions, and black liquor filtrate tank vents. The low-volume, high-concentration (LVHC) system collects non-condensable gases (NCG) from the digester, blow heat recovery system, and turpentine recovery system for control of TRS and HAP compounds in the thermal oxidizer or lime kiln. The HVLC system collects dilute NCG from the Chip Bin, Blow Tanks, and the Pressure Diffuser filtrate tank vents for control of TRS and HAP compounds in the thermal oxidizer.

A pressure diffuser washes pulp leaving the Kamyr digester. Pulp from the pressure diffuser is discharged into two atmospheric blow tanks. The capability exists to discharge continuously regardless of changes in wood species. Pulp from the blow tanks is screened to remove knots and other contaminants, and then receives a second stage of washing in the Brownstock Press.

Pulp is further delignified in the Oxygen Delignification system. The system consists of two oxygen reactor vessels in series (the second oxygen reactor vessel began construction in 2007 and was put in service in March 2008) followed by a pulp washing press Post-Oxygen Press, oxidized white liquor (OWL) system, and associated filtrate tanks. The pulp is delignified in the enclosed reactor vessel with oxygen-enriched caustic and/or oxidized white liquor. OWL is produced by reacting oxygen with white liquor in the OWL system. Brown pulp exiting the reactor is washed in the Post Oxygen Press, and stored in brown high density chests ahead of the Bleach Plant. The HVLC-NCG system collects vapors from the Post-Oxygen Press hood vent and from associated filtrate tanks for control of TRS, CO, and HAP compounds in the thermal oxidizer.

The chlorine dioxide generator uses chlorine gas to make ClO_2 for use in the bleach plant. The process components include chlorine railcar unloading, hydrochloric acid generation process and storage tanks, electrolyzer and chlorate reactor with associated storage and brine tank, and chiller, filter and cooler. ClO_2 generator, chlorate recovery system, ClO_2 absorber, hypochlorite production, and associated process and storage tanks. There are multiple unit processes in this area designed to recover chlorine, hydrochloric acid, and/or ClO_2 to the process or to control emissions before final discharge to the atmosphere. There are no uncontrolled process vents in this area. The following units control emissions before final discharge to the atmosphere:

- Chlorine Dioxide Scrubber (also known as the Peroxide Scrubber) controls Hypo Tower vent gas;
- Hypo Tower, a caustic scrubber controlling vents from multiple process units in the ClO_2 Generator, discharges direct to atmosphere when Chlorine Dioxide Scrubber is off line;
- Hydrogen Scrubber is a caustic scrubber that controls chlorine from excess hydrogen gas;
- HCl Burner tail gas scrubber/cooler and ejector condenser;
- HCl Vent Scrubber which is used during HCl storage tank loading from railcar;
- HCl Storage Tank Vent Pot.

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NESHAP Subpart S (Pulp and Paper MACT I) defines integrated chlorine dioxide plants at Kraft pulp mills as part of the Bleach Plant, but established no applicable standards for chlorine dioxide generation due to the low HAP emissions rates from these facilities.

The bleach plant consists of a pre-bleach Compaction Baffle Washer followed by a three-stage diffusion washer bleach plant. The bleaching is accomplished in two bleaching stages and one extraction stage. Primary bleaching agents are ClO_2 solution and hydrogen peroxide with ClO_2 solution addition occurring at the D_1 and D_2 stages. Peroxide may be added in the bleach towers, standpipes, or pulp storage. Caustic and sulfuric acid are used for pH control. Bleached stock is discharged to pulp storage tanks, and fed in slurry form to the No. 3 Paper Machine, the Wetlap Pulp Machine, and to NORPAC. The discharge points from this emission unit are from the bleach plant scrubber, bleach tower roof cover openings, bleach tower vent gas accumulator, and high density storage tanks. Bleach tower and filtrate tank vents are collected under vacuum and sent to the bleach plant scrubber. The scrubber is a catenary grid wet caustic scrubber and uses white liquor for Oxidation-reduction Potential (ORP) control of recirculated scrubber liquor to control chlorine and chlorine dioxide emissions from the bleach plant process vents. As a backup, alkaline E-stage filtrate is used as the scrubbing liquid on a once through basis when white liquor supply is not available.

The wetlap machine dewateres bleached or unbleached pulp to produce bundles of pulp for use in the paper machines on-site or for sale. Bales are stored in the Wetlap Building or in other warehouse on or off site. The activities associated with the wetlap machine are all insignificant emission units. There are no control devices on the wetlap machine.

The No. 3 paper machine produces a variety of pulp and paperboard grades. The sheet is produced from a mixture of softwood and hardwood pulps and from recycled paper. The pulp and broke are processed in the stock preparation area. The various pulp stocks and additives are blended to produce the desired composition. The pulp fibers are then refined and sent through a series of screens and centrifugal cleaners to ensure quality. After the stock has been processed in the stock preparation area, the stock is pumped to the headbox and metered onto the continuous wire of the paper machine. The pulp sheet then enters the presses where most of the water in the sheet is removed by rollers. After the presses, the sheet passes through steam heated dryers where additional moisture is removed. The sheet then passes through calendars where the sheet is compressed and smoothed prior to being wound onto reels to produce the finished product. Other processes include a cyclone used to collect and recover paper trim from the paper machine and the neighboring extruder operations. The activities associated with the No. 3 Paper Machine are all insignificant emission units, including the paper trimmer and associated cyclone. There are no control devices on the air exhausts from the No. 3 Paper Machine.

Process flow diagram(s) and identification of emission units on a plant schematic are located in Appendix C on page 30 of this document.

Ecology has the emission inventory for the facility on file with the Industrial Section in Lacey, Washington. That information, along with monthly emission reports and required permit submittals, are available for review by scheduling through the Industrial Section.

Regulatory compliance has been good for this facility. The only air penalty issued during the last several years was a penalty for a June 3, 2008 odor violation for \$4,000. This incident resulted in Ecology issuing

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a Notice of Violation issued on July 29, 2008, and the penalty issued on September 19, 2008. The penalty was paid in full. The facility has complied with their air operating permit conditions.

6.0 Emission Unit Description

DESCRIPTION AND HISTORY OF EACH EMISSION UNIT

The following discussion provides the name of the emission unit, its function, what control equipment is installed, and what pollutants are controlled.

Fiberline (pulping, washing, and bleaching): The Sulfite pulp mill, which operated from 1931 through 1978, was the first pulping operation on the site. The Kraft pulp mill was originally built in 1948, expanded in 1952, replaced in the Kraft Modernization Project completed in 1995, and has undergone additional upgrades since including the Fiberline Yield Improvement Project in 2008 (adding the second oxygen delignification reactor vessel).

The following discussion provides the name of the emission unit, its function, what control equipment is installed, and what pollutants are controlled. In addition, each limit for each emission is listed and the limit's origin is identified, such as BACT, PSD, NSPS, LAER, and MACT.

#10 boiler (Kraft recovery boiler) was constructed in June 1975. This predates the NSPS applicability date of September 24, 1976 set forth in 40 CFR 60.280(b). It is a permitted operation.

Babcock & Wilcox (B&W) low-odor type recovery furnace.

Furnace upgrades in conjunction with Kraft Modernization Project in 1995 included an upgrade to high-concentration black liquor firing and addition of a third precipitator chamber. Boiler Rebuild in 2002 included upgrades to the air systems and replacement of the smelt dissolver, boiler floor, walls, economizer, and portions of the generating section.

Steam capacity limited at ~808 kpph steam, equivalent to ~270 kpph BLS (6.5 million lbs dry BLS/day).

Supplemental use of #6 fuel oil is primarily for startup, shutdown, and malfunction.

A three-chamber electrostatic precipitator is used to remove particulate matter from the recovery boiler's exhaust gases.

#11 boiler (hog fuel, fuel oil, coal/coke, wastewater treatment solids, and de-ink sludge). This boiler was constructed in 1974. It is a permitted operation. SWAPCA order 78-406.

Boiler has a capacity of 600 + MMBtu/hour.

Foster Wheeler spreader-stoker type boiler installed ~1976.

Nominal capacity: 580,000 lb steam/hour. At 64.23% design efficiency, @1,125 btu/lb steam generated, nominal fuel heat input capacity is 1,016 mmbtu/hr.

Fuels burned: hog fuel, coal, effluent treatment solids, and #6 fuel oil <2% sulfur.

Fuel oil used primarily for startup, shutdown, and upsets.

2006 average hog/coal/sludge fuel mix in tons /hour was 54 tph /6 tph /14 tph.

2006 average hog/coal/sludge fuel mix, fuel heat input: ~68%/20%/12%.

2006 average fuel heat input: 340 kpph steam was >595 mmbtu/hr.

2006 maximum hourly fuel heat input: 560 kpph steam was >962 mmbtu/hr.

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The #11 boiler has a multiclone and a dry ESP. Emissions controlled are particulate, and with sorbent injection for acid gas, HCL and SO₂ are controlled. The 2008 annual emissions summary report showed that there was not an actual emissions increase from the boiler upgrade project.

Boiler #6 uses fuel oil or natural gas. This boiler was thought to have been constructed in 1928. Boiler #6 was moved to the boiler house in 1950's. It is a permitted operation. There is no emission control device.

Boiler #7 uses fuel oil or natural gas. This boiler is believed to have been constructed in 1928, and was moved to boiler house in 1950's. It is a permitted operation. There is no emission control device.

Boiler #8 was removed in 1983. It is not a permitted operation.

Boiler #9 uses natural gas or fuel oil. The boiler is believed to have been built in 1931, and was moved to boiler house in 1961. It is a permitted operation. There is no emission control device.

Pulp Machine #1 was operated from 1932 – 1956. It has been removed, and is not a permitted operation.

Pulp Machine #2 operated from 1948 – 1976. It has been removed, and is not a permitted operation.

Pulp Machine #3 (also known as Pioneer paperboard machine or Liquid Packaging Machine) was constructed in 1952, was rebuilt in 1987 and 1994, and is a permitted operation.

Paper Machine #4 operated from 1956 – 1996. It has been removed, and is not a permitted operation.

Paper Machine #5 operated from 1961 – 1971. It has been removed, and is not a permitted operation.

Fine Paper Machine #1 (also known as RW #1) operated from 1956 – 2003. It has been removed and is not a permitted operation.

Fine Paper Machine #2 (also known as RW #2) operated from 1964 – 2001. It has been removed and is not a permitted operation.

TSV sulfite semichemical pulping operated from 1965 – 1976. It has been removed and is not a permitted operation.

Lime Kiln #1 was replaced by Lime Kiln #4, and is not a permitted operation.

Lime Kiln #2 was replaced by Lime Kiln #4, and is not a permitted operation.

Lime Kiln #3 was replaced by Lime Kiln #4, and is not a permitted operation.

Lime Kiln #4 was constructed in 1986, and is a permitted operation. The emissions from the lime kiln are sent through an electrostatic precipitator to control particulate emissions.

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12 batch digesters, six of which were constructed in 1948, and the other six constructed in 1956, were replaced by a Kamyr digester in 1995. The former batch digesters have been removed and are not permitted operations.

The #7 multiple effect evaporator (for black liquor) was constructed in June 1975, and is a permitted operation.

The NCG Incinerator was constructed in 1984 and is a permitted operation. The incinerator scrubber controls sulfur dioxide emissions from the incinerator.

The Smelt Dissolver Tank was constructed in June 1975 and replaced in 2002, and is a permitted operation. The exhaust gases from the smelt dissolving tank are controlled using a Ducon spray shower wet scrubber.

The Package boiler was constructed in 1992 and shutdown February 2000, and has been removed from the site. It is not a permitted operation.

Old Kamyr digester (Kraft pulping). Removed and it is not a permitted operation.

New Fiberline, including Kamyr digester, Brownstock washing, Oxygen delignification and Bleach Plant Systems, began construction in 1992 and started operation in 1995. It is a permitted operation. It has a short term capacity of approximately 1260 bleached bone dry tons per day and an annual capacity of approximately 1150 bleached bone dry tons per day. The low-volume, high-concentration (LVHC) system collects non-condensable gases (NCG) from the digester, blow heat recovery system, and turpentine recovery system for control of TRS and HAP compounds in the thermal oxidizer or lime kiln. The HVLC system collects dilute NCG from the chip Bin, Blow Tanks, and the Pressure Diffuser filtrate tank vents for control of TRS and HAP compounds in the thermal oxidizer.

Multiple Effect Evaporator Set #8 was originally constructed as a concentrator in 1975 in conjunction with the new #10 Recovery Boiler, and was modified to a multiple effect evaporator set in 1995 in conjunction with the Kraft Modernization Project and #10 Recovery Boiler Rebuild.

The East power house North bank was shutdown in 1998, and not a permitted operation.

The East power house South bank was shutdown in 1978 and is not a permitted operation.

Boilers #1, #2 (sulfite recovery), and #3 (Kraft Recovery) were constructed in 1948. Boiler #4 (Kraft Recover) was constructed in 1952, and #5 (Kraft Recover) was constructed in 1957. Boilers #1 and #2 shut down with the rest of the old sulfite mill operations in 1978, and Boilers #3, #4, and #5 were replaced by #10 Boiler in 1975. These boilers have all been removed, and are not permitted operations.

The Sawmill was constructed in 2008, and has a bag house to control trimmer saw emissions. The post-project potential emissions totals summary for 2008 for the sawmill showed that there was not a significant emission increase. It is a permitted operation.

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Lumber processing includes lumber dry kilns, planers, and anti-sapstain spray treatment systems. These units have until recently been considered a “natural minor source” of air emissions not subject to Title V permitting requirements. However, recent dry kiln emissions research conducted by Oregon State University indicates that lumber drying kiln emissions are greater than previously thought. Thus, VOC emissions values are higher. Based on the new emissions factors, the Longview Lumber Products facility is a major source. At maximum drying kiln operating rates, potential emissions of methanol are estimated to exceed the major source threshold of 10 tons per year, total HAP are estimated to exceed the 25 tons per year threshold, and potential VOC emissions are estimated to exceed the major source threshold of 1900 tons per year. Therefore, in 2008, Ecology amended the air order that addresses the Longview Lumber Facility to address these changes. This order number is DE 97AQ-I087, and has been updated in the proposed air operating permit. There are 10 drying kilns on site, and they are considered one emission unit with each drying kiln constituting a separate emission point. The heat for drying is provided by process steam generated from boilers in the Kraft Mill Power and Recovery process area. Each kiln has an estimated annual drying capacity of approximately 30 MMBf per year each, or 300 MMBf per year total (nominal capacity for Douglas Fir; capacity is about 50% lower for coastal Western Hemlock). The lumber drying kilns are subject to the Plywood and Composite Wood Products MACT standard, 40 CFR 63 Subpart DDDD. U.S. EPA determined in the standard that MACT controls for HAP from lumber drying kilns is no controls. Therefore, there are no applicable MACT requirements beyond submittal of the initial notification of applicability, which was submitted on January 26, 2005. There are no emission control devices on the drying kilns.

Legal issues:

All State of Washington only requirements are not in the SIP, and therefore are not federally enforceable.

Ecology notified the Weyerhaeuser Company in a letter from Ecology’s Air Quality Program dated November 24, 2008, that the transfer of the property ownership to Weyerhaeuser NR Company did not constitute a change in ownership and therefore the facility is not applicable to the requirements of Part II of WAC 173-407.

The court upheld that Title V Permits could not impose new monitoring requirements if monitoring requirements already existed. The following is left from the previous support document, and is intended to be a historical record on surrogate parameters incorporated into Title V Permits.

During development of the Title V requirement, each permit contains terms and conditions that assure compliance with all applicable requirements. This requirement has been interpreted to mean literally at all times, and required gap filling monitoring to achieve this.

The frequency of direct source testing was initially proposed as fulfilling the stated need to assure continuance compliance. This position was based on the belief that a surrogate parameter could indicate compliance, but could not definitively establish compliance. To attempt to rely on a surrogate parameter as a direct compliance determinant would present a weak technical basis for an enforcement action. After much discussion, it was decided to incorporate gap filling monitoring requirements designed to indicate, but not necessarily assure, compliance. Making this position more tenable was the evolution of the surrogate parameter as a trigger for corrective action on the part of the Permittee. No

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specific guidelines or criteria exist for determining a specific surrogate parameter set point. Each determination is made on a case-by-case basis exercising best professional judgment. Usually there are many operational parameters that collectively correlate with emissions. However, the correlation is still not definitive enough to inappropriately limit operational flexibility by establishing in effect a straight jacket of surrogate parameter constraints. The guidance that the permit be implementable as a practical manner brings focus on the need to select the single best surrogate parameter that can serve as a corrective action trigger. The subsequent question then becomes what set point to choose.

Much of the surrogate parameter discussion concerned particulate emissions, which are generally evaluated at discrete time intervals through source tests. Opacity was proposed as a surrogate monitor for particulate emissions. This imposed some consistency in surrogate parameters among various types of combustion emission units. Ecology chose the opacity limit itself as the surrogate parameter set point triggering corrective action. The opacity/particulate relationship is variable both between similar types of emission units and within an emission unit itself.

Choosing the opacity limit sets the threshold for corrective action at a point that unequivocally warrants a corrective action response. Lacking federal criteria for acceptance and evaluation of surrogate monitoring parameters, Ecology deems this approach the most appropriate from a technical and enforcement perspective because a previous assessment of the visual relationship between opacity and particulate revealed that the particulate limit would not be exceeded at an opacity of about 35%. The variability between opacity and particulate was very large, and showed only a general trend toward higher particulate emissions as opacity increased. This relationship was as Ecology expected and confirms the use of the opacity limit itself as a trigger point for corrective action. Exceedance of the opacity limit itself is a corrective action set point that unequivocally warrants corrective action.

Assuring Compliance with All Applicable Requirements

Copies of the state Regulatory Orders that impose limitations and requirements on the Permittee are provided in Appendix B of this permit. Orders are not intended to be separate legal sources for default limitations that are based in state regulations. Therefore, for limits derived directly from state regulations that were included in Regulatory Orders for convenience purposes, Ecology considers the regulation and not the Order to be the applicable requirement for purposes of Title V. Consequently, the permit does not cite the Order as an applicable requirement for regulatory limits; for these limits, the permit cites only the regulation as the underlying applicable requirement.

The Weyerhaeuser Longview facility is Best Available Retrofit Technology (BART) eligible because the #11 Hog Fuel Boiler, #10 boiler (Kraft recovery furnace) and smelt dissolving tank were built in BART timeframe, and emissions of SO₂ and NO_x from these units are greater than 250 tons. NORPAC is all post 1977. The NEI ID # is 530150003. BART categories are 01, 03, and 22.

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Comments on Specific Permit Conditions

1. Permit Condition A.1

NORPAC uses old newsprint (ONP) as part of the fiber source. The ONP baghouse addresses industrial hygiene concerns about airborne particulate generated in the handling of old newsprint. See page 5-10 of the Application for more specifics about the ONP baghouse. The original NOC approval for this unit imposed a once every 5 year source testing frequency which was deemed appropriate given the potential and magnitude of impact should the baghouse fail.

The Title V permit imposes no more frequent source testing or additional monitoring because this source is still deemed capable of only a negligible environmental impact should the baghouse fail. Opacity is never considered to be of concern from this source because it is meant to control fugitive emissions and not emissions from a combustion source. A typical baghouse in this type of application is considered a robust piece of control equipment.

2. Permit Condition A.3, A.4, and A.5

The emission limits listed in A.3, A.4, and A.5 have been updated to reflect PSD 97-01 Amendment 2 issued April 20, 2004. Amendment 2 included revised emission limits for VOC and CO from NORPAC I & II emission units. The amended PSD emission limits reflect changes at NORPAC since PSD 97-01 was issued. These changes include: updated emission factors for the TMP Mill and Paper Machines, based on 2002 emission testing data; increased overall production rates at the TMP Mill and Paper Machines; and increased production of high brightness paper grades.

The amended daily VOC limit in A.3 (6,488 pounds per day) is significantly lower than the limit in the previous AOP (9,636 pounds per day) because process changes decreased emissions from several vent streams, resulting in lower peak emission rates. The amended annual VOC limit in A.4 (927.3 tons per year) is higher than the VOC limit in the previous AOP (862 tons per year) because of increased production rates and increased production of high brightness pulp and paper grades. The amended CO emission limit in A.5 (891.4 tons per year) is substantially higher than in the previous AOP (84 tons per year) for the same reasons as the annual VOC limit changes, and because the amended limit applies to emissions from NORPAC I emission units as well as NORPAC II emission units.

3. Permit Condition B.1

The emissions and derived limits are a function of the processes that comprise the Fiberline. No further monitoring is specified based on evaluation of the initial compliance determination results, which indicated that average Fiberline CO emissions were 48 lb/hr. Maximum CO emissions were 80 lb/hour. These initial test results were considered far enough below the allowable limit (349 lbs/hr) such that further monitoring is not required. Also, Fiberline CO emissions were reduced by roughly 50% in 1998 when the Oxygen Delignification system process vent was voluntarily tied into the HVLC system for control by thermal oxidation in the NCG Incinerator. These controls are estimated >96% of process operating time.

4. Permit Condition E.4, G.3, H.13

The $\leq 2\%$ sulfur limit on fuel oil sulfur content for Power Boiler #6 assures compliance with the 1,000 ppm SO₂ standard because Ecology used fuel ("F") factors from 40 CFR Part 60 Appendix A Method 19 to

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demonstrate that the amount of sulfur in the fuel would prevent the concentration of SO₂ in the emissions ever exceeding the 1,000 ppm SO₂ limit.

5. Permit Condition G.1

Compliance with the 0.1 gr/dscf @7% oxygen was demonstrated by using factors from 40 CFR Part 60 and the amount of fuel burned to show that the source complies with the limit of 0.1 gr/dscf @ 7% oxygen for the fuels of oil and natural gas.

6. Permit Conditions G.2

The opacity monitoring requirements for boilers 6, 7, and 9 differ from those required for other emission units in recognition of the type of fuels used in this unit and in recognition of the Permittee's own economic interest to efficiently run this unit.

Visual observations are waived when these units combust only natural gas because gas is a clean burning fuel and visible emissions are not expected to be present even during inefficient operation. This is recognized in the Federal New Source Performance Standards, which do not require opacity monitoring for boilers that only combust natural gas.

Visible emissions from oil burning typically result from incomplete combustion. It is in the Permittee's best economic interest to assure efficient combustion to derive the maximum energy benefits from the fuel purchased. By maintaining efficient combustion, visual emissions are minimized. The facility is required to maintain records of fuel consumption to document what monitoring is appropriate. Additional visual monitoring is required of boilers 6, 7, and 9 when they burn oil.

A visual opacity assessment, as used in this permit, is the use of an observer trained in general procedures for determining visible emissions, which could include DOE Method 9B or EPA Method 9. A trained observer does not need to have current certification in Method 9B. Under normal conditions, a trained observer is expected to be present at the facility, while a certified Method 9B observer may not always be readily available. There is no specified time period over which a visual assessment must be conducted. Best professional judgment is relied upon on a case-by-case basis for determining how long to conduct a visual assessment before reaching a conclusion on whether or not corrective action is warranted in response to opacity.

7. Permit Condition G.3

See explanation for Permit Condition E.4.

8. Permit Conditions H.6, H.7, H.8

Conditions H.6, H.7, and H.8 all relate to PM₁₀. These permit requirements are a result of the PSD permit. These requirements are from the existing permit.

9. Permit Condition H.12

See explanation for Permit Condition E.4.

10. Permit Condition H.14, H.18

Ecology is requiring no further monitoring based on initial source testing results. The SO₂ limits are 884 tpy. The NO_x limits are 1179 tpy.

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11. Permit Condition H.19, H.20

Ecology is requiring no further monitoring based on initial source testing results. The CO limits are 1000 ppmdv and 2,564 tpy.

12. Condition H.21, H.22

Ecology is requiring no further monitoring based on initial source testing results. The limits are 50 ppmdv and 201 tpy.

13. Permit Condition J.4, J.7, J.8

Conditions 12 and 13 of PSD-92-03/Order 92AQI069 Amendment 3 allow Weyerhaeuser to propose alternate means other than Reference Test Methods for verifying compliance with TRS and SO₂ emission limitations. Weyerhaeuser conducted testing to determine alternate compliance indicating parameters and Ecology is incorporating these into the Title V permit.

Ecology has selected scrubber pH of 6.5 as a surrogate monitoring parameter to indicate compliance with the 300 ppm SO₂ limit. Ecology has selected scrubber pH of 6.0 as a surrogate monitoring parameter to indicate compliance with the 1000 ppm SO₂ limit.

Ecology has selected incinerator temperature of equal to or greater than 1350 degrees F as a surrogate monitoring parameter to indicate compliance with the 5 ppm TRS limit.

14. Permit Condition J.6

This section of the Support Document used to reference surrogate monitoring parameters that have been removed from the Permit in light of the recent federal court decision in the Appalachian Power Company et al v. EPA court decision. The court found that Title V Permits could not incorporate new monitoring requirements if monitoring was already stipulated elsewhere such as through Orders.

15. Permit Condition K.9b

No ongoing monitoring for SO₂ is proposed for the lime kiln based on emission testing results presented below. The SO₂ emission limit is 500 ppm @ 10% O₂. The lime kiln can be used to oxidize LVHC NCGs. The results below present SO₂ emissions with and without the oxidation of NCGs in the lime kiln.

Weyerhaeuser states that the reason for the low SO₂ emissions is that lime mud washing does not employ pulp mill evaporator condensates. This minimizes the introduction of sulfur into the lime kiln. Condition K.9b precludes the use of pulp mill evaporator condensate in lime mud washing. SO₂ emission results from LVHC NCG oxidation trials in the Lime Kiln. Testing occurred in first half of 1998.

16. Permit Conditions L.1

The Slaker vent is a source of very little particulate even when the scrubber is not functioning effectively. Testing done in 1997 with the scrubber nozzles partially clogged resulted in emissions of 0.09 gr/dscf or about 14 lbs/day. Retesting done after cleaning the nozzles resulted in emissions of 0.02 gr/dscf with scrubber pressure of 23 psi. The particulate limit is 0.07 gr/dscf. Weyerhaeuser believes that a good spray patten is most important in particulate control. They believe a good spray pattern is achieved at pressure and flow of 8 psig and 20 gpm.

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Ecology is proposing surrogate levels of 23 psig and 50 gpm. Given that a source test at 23 psig resulted in emissions far under the limit and that the source is a small source or particulate emissions Ecology is proposing to accept the 23 psig and 50 gpm as surrogate monitoring parameters.

17. Permit Condition L.2

This section of the Support Document used to reference surrogate monitoring parameters, which have been removed from the Permit in light of the recent federal court decision in the Appalachian Power Company et al v. EPA court decision. The court found that Title V Permits could not incorporate new monitoring requirements if monitoring was already stipulated elsewhere such as through Orders.

18. NESHAPS Standards

Final Subpart MM MACT rules were issued on January 12, 2001, and amended March 26, 2001. These rules established emission standards for existing recovery boilers, smelt dissolver tanks, and lime kilns. The final Subpart MM emission standards for existing sources became effective on March 13, 2004. The final emission standards for recovery furnaces and smelt dissolving tanks were identical to the case-by-case limits established for the Permittee, and the final emission standard for existing lime kilns is only marginally lower than the case-by-case limit established for the Permittee (0.064 gr/dscf @ 10% O₂ versus 0.067 gr/dscf @ 10% O₂). However, U.S. EPA has revised Subpart MM and 40 CFR 63.864(a) – (c) are listed as reserved. In the proposed permit, conditions H.24, H.25, I.11, I.12, I.13, K.4 and K.5 all make some reference to the citation in 40 CFR 63.864 (a) – (c) and have been changed to 40 CFR 63.864(k)..., which is the new citation as (a) – (c) is listed as reserved.

19. J – N MACT Requirements – federally enforceable limits

MACT requirements per 40 CFR Part 63 are addressed in these sections.

General requirements are addressed primarily in Section J, including the MACT SSM Plan, recordkeeping, and reporting.

Sections K, L, and M address 40 CFR Part 63 Subpart S requirements that include non-condensable gas collection systems and pulping process condensates.

40 CFR Part 63 Subpart MM requirements are addressed with the individual recovery furnaces, smelt dissolving tanks, and lime kilns to which they apply.

40 CFR Part 63 Subpart DDDDD was vacated. Therefore the numeric requirements that addressed the individual power boilers no longer exist. If in the future, U.S. EPA goes through rule making and issues a new Subpart DDDDD, those requirements will be added to the permit if the permit has been issued for two years or less. If the permit has been issued for over two years, the permit will be modified for Subpart DDDDD when the permit is reissued. It is important to note that the facility will be required to meet these new regulations when they are issued, even though the permit does not include Subpart DDDDD requirements.

20. Compliance Assurance Monitoring (CAM) – federally enforceable limits. CAM requirements, per 40 CFR Part 64, for specific parameters and units are identified in Section Q of the AOP. Specific monitoring

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requirements are included with the appropriate unit specific section of the AOP. Section Q notes the specific section in the AOP where each CAM requirement is addressed.

CAM requirements are applicable to units meeting all the following criteria:

- 40 CFR 64.2(a)(1) - The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under paragraph (b)(1) of this section;
- 40 CFR 64.2(a) (2) - The unit uses a control device to achieve compliance with any such emission limitation or standard; and
- 40 CFR 64.2(a)(3) - The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. For purposes of this paragraph, "potential pre-control device emissions" shall have the same meaning as "potential to emit," as defined in §64.1, except that emission reductions achieved by the applicable control device shall not be taken into account.

The Weyerhaeuser Longview facility uses equipment meeting the definition of "control device" (40 CFR 64.1). CAM requirements, per 40 CFR Part 64, for specific parameters and units are identified in Section Q of the AOP. Unit specific monitoring requirements along with general CAM requirements are included.

#10 Boiler (Recovery Boiler) CAM requirements:

The Recovery Boiler particulate emissions are controlled by an electrostatic precipitator. The boiler emissions are subject to BACT emissions limits, Pulp & Paper Combustion unit MACT standards for particulate as a HAP indicator, and a 20% opacity limit.

The facility is required to operate a continuous opacity monitoring system (COMS). Opacity measurements can also be used as a surrogate indicator of performance with respect to the PM emissions limits. The COMS system will at all times be operated in conformance with US EPA Performance Specification 1 (PS1). All occasions exceeding the target indicator ranges will be documented.

The selected indicator range of 20% was previously selected by U.S. EPA for continuous compliance assurance monitoring of Kraft Recovery Boilers in order to satisfy the Pulp & Paper Combustion Unit MACT standards that came into effect in 2004. Quarterly stack test results have not indicated any excursions since the Recovery Boiler precipitators were refurbished in 1995 with the boiler operating to an opacity limit of 20%.

The Permittee shall monitor stack opacity from the recovery furnace control using a continuous opacity monitoring system (COMS). The COMS on the recovery furnace will be calibrated and maintained in accordance with the requirements established in 40 CFR 63.864(d).

Begin corrective action when an exceedence occurs. Report exceedences and violations, and each report shall contain the information listed in Condition Q.9.

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#10 Recovery Boiler – PM/ PM₁₀

Emission Unit: Recovery Boiler

Pollutant Controlled: Particulate/ PM₁₀

Control Device: Electrostatic Precipitator

1. Indicator/Parameter	Continuous opacity monitoring system (COMS)
2. Indicator/Parameter Range	Opacity <20% over a 6-minute average
3. Performance Criteria	
a) Data Representativeness	COMS is located in representative location on the stack, opacity is continuously monitored, and data is continually collected by the COMS during operation of the boiler.
b) Verification of Operational Status	The COMS is calibrated in accordance with PS1.
c) QA/QC Practices and Criteria	The COMS is operated in accordance with PS1.
d) Monitoring Frequency & Data Collection Frequency	Opacity values are collected and recorded continuously.

Lime Kiln CAM requirements:

Lime kiln particulate emissions are controlled by an electrostatic precipitator. The kiln stacks are subject to BACT emission limits, Pulp and Paper combustion unit MACT standards for particulate as a HAP indicator, and a 25% opacity limit.

The selection of the performance indicator is that the facility is required to operate a COMS, and opacity measurements can be used as a surrogate indicator of performance with respect to the PM emission limits. The COMS system will at all times be operated in conformance with PS1. All excursions exceeding the target indicator ranges will be documented. The selected indicator range of 20% opacity was previously selected by U.S. EPA for continuous compliance assurance monitoring of Kraft mill lime kilns in order to satisfy the Pulp & Paper combustion Unit MACT standards that came into effect in 2004. Additional monitoring or more stringent indicator ranges were not considered justified because of the very low emissions rate from the lime kiln.

Emission Unit: Lime Kiln (Stacks #1 and #2)

Pollutant Controlled: Particulate/PM₁₀

Control Device: Electrostatic Precipitator

	1. Indicator/Parameter	Continuous opacity monitoring system (COMS)	
	2. Indicator/Parameter Range	Opacity <20% over a 6-minute average	
	3. Performance Criteria		
	a) Data Representativeness	COMS are located in representative locations, opacity is continuously monitored, and data is continually collected by the COMS during	

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		operation of the kiln.	
	b) Verification of Operational Status	The COMS is calibrated in accordance with PS1.	
	c) QA/QC Practices and Criteria	The COMS is operated in accordance with PS1.	
	d) Monitoring Frequency & Data collection Frequency	Opacity values are collected and recorded continuously.	

Hog Fuel Boiler (Boiler #11) CAM requirements:

The Hog Fuel boiler's particulate emissions are controlled by a dry electrostatic precipitator (ESP). Boiler emissions are subject to NSPS particulate emissions limits and to voluntary emissions reduction limits more stringent than the state Kraft Mill emissions limits, and a 20% opacity limit.

The facility is required to operate a COMS on the stack. Opacity measurements can also be used as a surrogate indicator of performance with respect to the PM emission limits. The COMS system will at all times be operated in conformance with PS1. All excursions exceeding the target indicator ranges will be documented.

The selected indicator range of 20% opacity was previously selected by U.S. EPA for continuous compliance assurance monitoring of boilers in order to satisfy the Pulp & Paper combustion Unit MACT standards that came into effect in 2004. The boiler has consistently met particulate emissions limits based on quarterly test results while operating at opacity emissions levels approaching 20%.

The Permittee shall monitor stack opacity from the Hog Fuel Boiler control using a continuous opacity monitoring system (COMS). The COMS on the hog fuel boiler (boiler #11) will be calibrated and maintained in accordance with the requirements established in 40 CFR 63.864(d).

Begin corrective action when an excursion occurs. Report excursions and violations and each report shall contain the information listed in Condition S.10.

#11 Hog Fuel Boiler – PM/ PM₁₀

Emission Unit: #11 Hog Fuel Boiler

Pollutant Controlled: Particulate/PM₁₀

Control Device: Dry Electrostatic Precipitator

1. Indicator/Parameter	Continuous opacity monitoring system (COMS)
2. Indicator/Parameter Range	Opacity <20% over a 6-minute average
3. Performance Criteria	
a) Data Representativeness	COMS are located in representative locations, opacity is continuously monitored, and data is continually collected by the COMS during operation of the Hog Fuel boiler.
b) Verification of Operational Status	The COMS is calibrated in accordance with PS1.
c) QA/QC Practices and Criteria	The COMS is operated in accordance with PS1.
d) Monitoring Frequency & Data collection Frequency	Opacity values are collected and recorded continuously.

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21. Permit Condition 8.

Permit Condition 8 is the generic opacity limitation from WAC 173-405-040(6) which addresses Kraft mills. Permit Conditions 9 and 12 work together to assure compliance with Condition 8 by requiring, first, that facility equipment be maintained and operated in a manner consistent with good air pollution control practice and, second, that the Permittee record and promptly respond to complaints received or possible noncompliance noticed by facility staff.

Ecology believes that this is a practical and effective way to assure compliance because the emission units covered by this condition do not have control devices that can be monitored and they have very low risk of producing visible emissions except during process upsets. The mill is staffed around the clock and all staff are trained to notice and report unusual conditions, such as those associated with upsets. It is a violation of the permit to fail to take corrective action when an instance of possible noncompliance has been reported and found to be valid. Ecology believes that imposing additional monitoring such as a weekly visual inspection would have little value in identifying noncompliance and would, by presence, possibly convey a false sense of compliance.

22. Permit Condition 10.

Permit Condition 10 is the generic SO₂ limitation from WAC 173-405-040(11) which addresses Kraft mills. EPA raised the issue of compliance regarding this requirement given the discrete interval of testing for some units and the existence of units for which no monitoring is required.

Ecology has imposed periodic discrete monitoring for those units deemed to warrant monitoring. Ecology has not imposed monitoring for units unlikely to have a reasonable potential of exceeding SO₂ emission limits.

Surrogate monitoring for intervals between direct SO₂ testing was not imposed because in practice mills do not adjust operating parameters to minimize SO₂ emissions. There are no control devices or control strategies to allow this. Instead, SO₂ emissions are largely a function of equipment and process design. The nature of the Kraft process is optimized by system stability and continuity. Ecology has no professional basis to believe that process parameters fluctuate to a degree that results in SO₂ emissions approaching the 1000 ppm limit and thus warranting surrogate monitoring.

23. Permit Condition 11.

Permit condition 11 consists of two parts. The first part is an inclusion of WAC 173-400-105(5)(h) which allows that monitoring and reporting requirements may be temporarily lifted during periods of monitoring system malfunction provided the Permittee adequately explain such periods.

The second part of condition 11 is based on what Ecology considers an unlikely but possible scenario where recorded monitoring data is simply lost. Ecology will allow a 90% recovery rate for monitoring data if the Permittee provides an adequate explanation for the cause of the lost data. Ecology expects the Permittee to make every reasonable effort to maintain the integrity of all monitoring results. An allowance is specified for missing monitoring results under certain conditions so that these defined conditions are not defined as violations, thus reducing the administrative burden on the source and the permitting authority.

24. Permit Condition 49.

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Permit condition 49 addresses Risk Management Programs in accordance with 40 CFR Part 68. This requirement is also known as the CAA 112[®] program and is designed to prevent chemical accidents and releases through a program of preparedness, response, and prevention. The General Duty Clause (Section 112(r)(1)) requires that owners and operators of stationary sources producing, processing, and storing extremely hazardous substances have a general duty to identify hazards associated with an accidental release, design, and maintain a safe facility, and minimize consequences of accidental releases. The Risk Management Plan (RMP) is required to be developed by subject facilities, and includes an executive summary, registration information, off-site consequence analysis, five-year accident history, prevention program, and emergency response program. The permittee is required to certify compliance for this requirement as part of their annual compliance report.

7.0 Insignificant Emission Unit(s)

The facility-wide general requirements apply to the whole facility, including insignificant emission units and activities (IEUs), as required by the operating permit rule. The rule states, however, that IEUs are not subject to monitoring requirements unless the generally applicable requirements in the State Implementation Plan (SIP) impose them [WAC 173-401-530(2) (c)]. The Washington SIP does not impose any specific monitoring-related requirements for the facility-wide requirements for IEUs at this source. The permit, therefore, does not require any testing, monitoring, reporting, or recordkeeping for insignificant emission units or activities.

The following table lists insignificant emission units and activities at the facility:

WAC 173-401-530	Insignificant emission units.
WAC 173-401-530(1)(c)	Emissions unit or activity listed in WAC 173-401-533 and considered insignificant based on size or production rate. Must be listed in the application.
WAC 173-401-530(1)(d)	Fugitive emissions that are only subject to general requirements of the SIP. Must be listed on the application.
WAC 173-401-530(4)	Insignificant emission thresholds. Must list units; no permit shield.
WAC 173-401-532	Categorically exempt insignificant emission units. Need not be listed in application.
WAC 173-410-533	Units and activities defined as insignificant on the basis of size or production rate.
WAC 173-401-533(2)(c)	Loading and unloading of VOC storage tanks (including gasoline storage tanks), ten thousand gallons capacity or less, with lids or other appropriate closure, vp not greater than 80 mm Hg at 21 degrees C.
WAC 173-401-533(2)(d)	Loading and unloading storage of butane, propane, or liquefied petroleum gas (LPG), storage tanks, vessel capacity under forty thousand gallons.
WAC 173-401-533(2)(i)	Welding using not more than one ton per day of welding rod.
WAC 173-401-533(2)(o)	Batch solvent distillation, not greater than fifty-five gallons batch capacity.
WAC 173-401-533(2)(p)	Municipal and industrial water chlorination facilities of

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	not greater than twenty million gallons per day capacity. The exemption does not apply to wastewater treatment.
WAC 173-401-533(2)(s)	Tanks, vessels, and pumping equipment with lids or other appropriate closure for storage of dispensing of aqueous solutions of inorganic salts, gases, and acids. See specific regulation for exclusions.
WAC 173-401-533(2)(bb)	Municipal and industrial wastewater chlorination facilities of not greater than one million gallons per day capacity.
WAC 173-401-533(3)(c)	Chemical or physical analytical laboratory operations or equipment including fume hoods and vacuum pumps.
WAC 173-401-533(3)(d)	NPDES permitted ponds and lagoons utilized solely for the purpose of settling suspended solids and skimming of oil and grease.

8.0 Operational Flexibility

The source has not requested operational/flexibility (i.e., a special option on how the source may operate). Therefore, the proposed permit does not include an alternative operation plan.

9.0 Permit Shield

The following requirements do not apply to the facility as of the date of permit issuance for the reasons indicated:

CITATION	BRIEF DESCRIPTION	REASON INAPPLICABLE
40 CFR Part 60 Subpart Da, Standards of Performance for Electric Utility Steam Generators (construction or modification commenced after 9/18/78)	applies to the following types of generating units for which construction or modification commenced after September 18, 1978: generating greater than 250 MMBtu/Hr	Facility does not have this emission unit.

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40 CFR Part 60 Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units (construction or modification commenced after 7/19/84)	applies to the following types of generating units for which construction or modification commenced after July 19, 1984: generating greater than 29 MW (100 MMBtu/Hr)	Facility does not have this emission unit.
40 CFR Part 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	applies to the following types of generating units for which construction or modification commenced after June 9, 1989: generating greater than 10 MMBtu/Hr and less than 100 MMBtu/hr	Facility does not have this emission unit.
40 CFR §60.110a	Subpart Kb, Standards of Performance for Storage Vessels for Petroleum Liquids with a capacity greater than 40,000 gallons and for which construction is commenced after May 18, 1978.	Fuel oil tanks at the site have not been modified since the applicability date. All other tanks are either below the size applicability criteria or do not contain volatile organic liquids.
40 CFR 63, Subpart Q as amended through 9/8/94	No chromium based water treatment chemicals may be used in industrial process cooling towers	The facility does not use chromium based water treatment chemicals
SWAPCA Order of Approval 78-302 as amended through 1/16/78	approval to operate Pacific Lamination	Weyerhaeuser does not own or operate this source. However, sale of Pacific Lamination to Weyerhaeuser is scheduled for 1/1/10.
SWAPCA Order of Approval 78-3015 as amended through 2/2/78	approval to operate Pacific Lamination	Weyerhaeuser does not own or operate this source. However, sale of Pacific Lamination to Weyerhaeuser is scheduled for 1/1/10.
WAC 173-400-040(3)(b)	emissions unit identified as a significant contributor to nonattainment must use reasonable and available control methods to control emissions of contaminants for which area is designated nonattainment	The facility is not in a special control/nonattainment area
WAC 173-400-040(8)(b)	Sources of fugitive dust identified as significant contributors to a PM-10 nonattainment area must use RACT to control fugitive dust emissions.	The facility is not in a special control/nonattainment area
WAC 173-400-070 as amended through 2/19/91	emission standards for certain source categories	The facility is not in this source category and hogged fuel boilers regulated under 173-405 WAC
WAC 173-400-100 Registration	Registration required for listed sources, excluding sources subject to the operating permit program, after EPA grants interim or final approval to the state program.	Facility is subject to the operating permit program; EPA has granted interim approval for the state program.
WAC 173-400-105(6)	Applies to sources that are not subject to operating permit program.	Facility is subject to the operating permit program.

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WAC 173-405-040(1)(b) as amended through 2/1/95 <i>[STATE ONLY, NOT FEDERALLY ENFORCEABLE]</i>	17.5 ppm daily average TRS limit for recovery furnaces constructed before 1/1/70 and recovery furnaces with direct contact evaporators	RF #10 built after 1/1/70 without direct contact evaporator
Chapter 173-410 WAC; Sulfite Pulping Mills		facility is not a sulfite pulping mill
Chapter 173-433 WAC as amended through 2/3/93; Solid Fuel Burning Devices	Applies to wood stoves and fireplaces.	facility does not operate such devices
WAC 173-435-050(2)	no open fires during an air pollution episode	Facility does not conduct open burning.
Chapters 173-470, 474, 475, 480, 481 WAC	Ambient Air Quality Standards	AAQS apply to air sheds, not individual sources
Chapter 173-490 WAC	Emission Standards and Controls for Sources of VOCs	The facility is not in a special control/nonattainment area

Listed below are new requirements that are inapplicable to the Weyerhaeuser Longview facility that are being added to the proposed permit, and will become part of the permit shield.

CITATION	BRIEF DESCRIPTION	REASON INAPPLICABLE
40 CFR Part 60, Subpart DDDDD, and WAC 173-400-050(4), Commercial Industrial Solid Waste Incinerator (CISWI) Rules	Emission guidelines and compliance standards for commercial and industrial solid waste incineration units.	No affected facilities on site. The NCG Thermal Oxidizer is exempt as a pulping liquor recovery unit; because turpentine and methanol are managed as pulping liquors and pulping chemicals are recovered after combustion.
WAC 173-434 Solid Waste Incinerator Facilities (as revised 2003)	Regulates incineration of solid waste, including MSW, other than creosote treated wood, in amounts greater than 12 tons per day.	No units on site combust 12 tons per day or more of solid waste.
40 CFR Part 63, Subpart JJJJ, NESHAP for Paper and Other Web Coating (POWC)	MACT standard for controlling HAP from processes applying a coating to paper or other web substrates.	Does not apply to papermaking systems, but to systems that apply coatings to paper (or other web) products. EPA guidance has clarified that this MACT standard does not apply to size presses or other on-machine coating systems. There is no affected paper coating facilities at the site.
40 CFR Part 63, Subpart ZZZZ, NESHAP for Stationary Reciprocating Internal combustion Engines ("RICE" MACT Rule)	MACT Standards for stationary reciprocating internal combustion engines with a size rating of more than 500 brake horsepower located at a major source of HAP emissions.	Backup Fire Water Diesel Pumps are exempt as emergency backup equipment, run only for maintenance, testing, and emergencies. "A stationary RICE which is ... an existing emergency stationary RICE... Does not have to meet the requirements of this subpart."

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40 CFR Part 63, Subpart NNNNN, NESHAP for Hydrochloric Acid Production (HCL MACT)	MACT Standards for hydrochloric acid production plants that are not subject to 40 CFR part 63, subpart S, NESHAP from the Pulp and Paper Industry, or other specifically listed NESHAP subparts.	Not applicable because HCL generator is completely integrated component of Chlorine Dioxide Generator, which is defined as part of the Bleach Plant under Subpart S.
40 CFR Part 63, Subpart GGGGG, NESHAP for Site Remediation	Establishes MACT control standards for certain remediation processes and activities at remediation sites involving one or more of 97 listed organic HAP compounds.	There are no remediation activities subject to the rule. CERCLA sites, RCRA corrective actions, UST cleanups, or remediation actions extracting less than 1 Mg (10000 kg) of HAP per year.

10.0 Public Participation

Ecology will post a public notice of the proposed new AOP and support document in the local newspaper. The public notice will solicit public comments on the permit. If there is enough of a group interested in a public hearing, Ecology will hold a public meeting that will consist of two parts. The first part of the meeting will be a presentation by Ecology of the proposed permit, and include time for a question and answer session. The second part of the meeting will be a public hearing accepting written and verbal comments. As noted in the public notice, there will be a public comment period that will be open for 30 days. In addition, the support document and proposed AOP permit will be posted on Ecology's Industrial Section web page, which has the following address:

<http://apps.ecy.wa.gov/industrial/proposed.asp>

Comments received and Ecology's response to comments and resulting changes to the permit (if any) will be listed in Appendix D of the final version of this support document.

11.0 Attachments

- Appendix A, List of documents used to develop proposed permit.
- Appendix B, list of orders providing legal basis to proposed permit.
- Appendix C, site plan and process flow diagram.
- Appendix D, Comments received, and Ecology's response to comments.

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Appendix A

List of documents used to develop proposed permit

Existing AOP

Existing Support Document

AOP permit application

Orders listed in Appendix B

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Appendix B

List of orders providing legal basis to proposed permit

The specific applicable elements of these documents have been incorporated into the permit itself. The documents in entirety are kept on file and available for public review in Ecology's Industrial Section. The objective is to maintain the permit as a practical field document.

PSD-92-03 Amendment 4

Order No. DE 98AQ-I046

PSD 97-01

Order No. DE 95AQ-I035

Order No. DE 96AQ-I093

Order No. DE 95AQ-I076

Order No. DE 97AQ-I041

Order No. DE 94AQ-I080

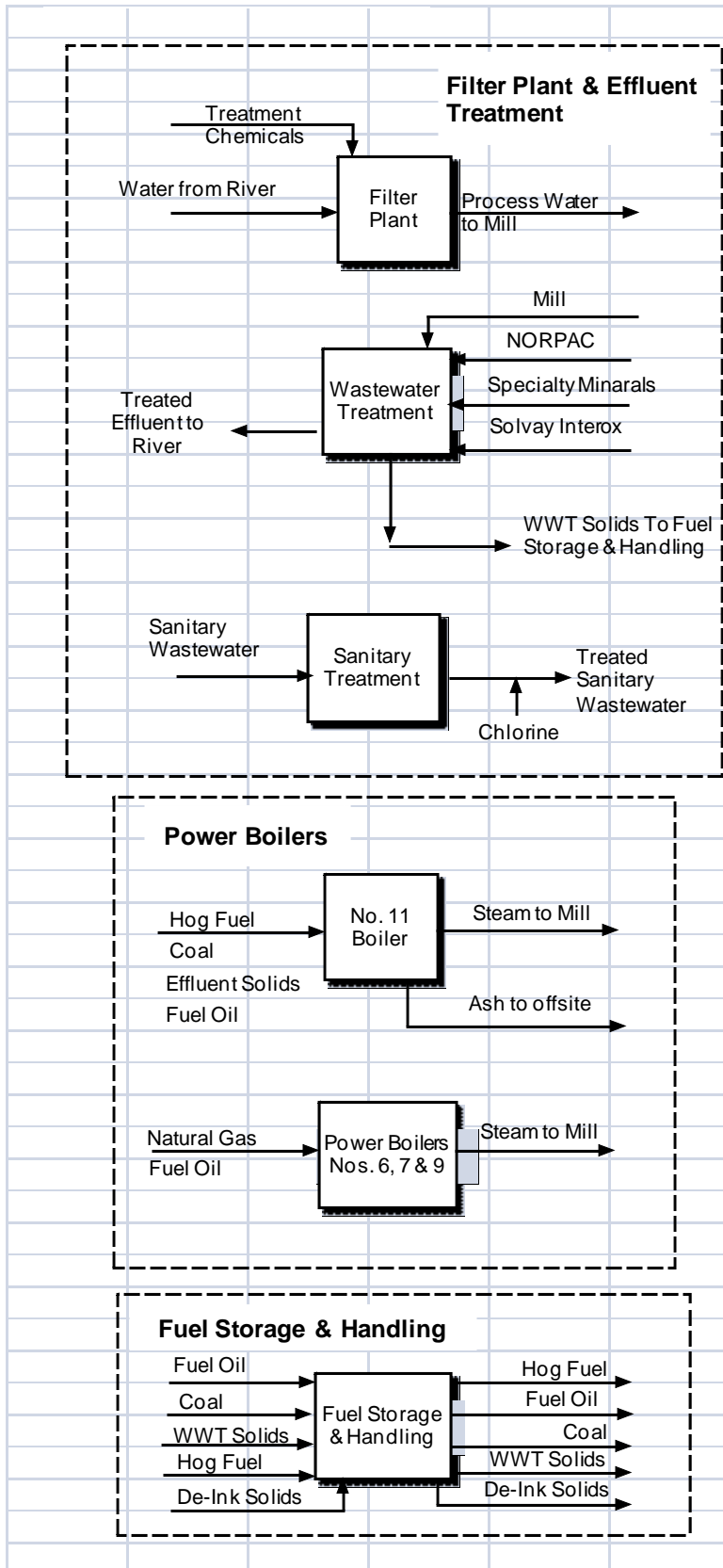
Weyerhaeuser Longview Air Operating Permit (AOP) Support Document

Appendix C

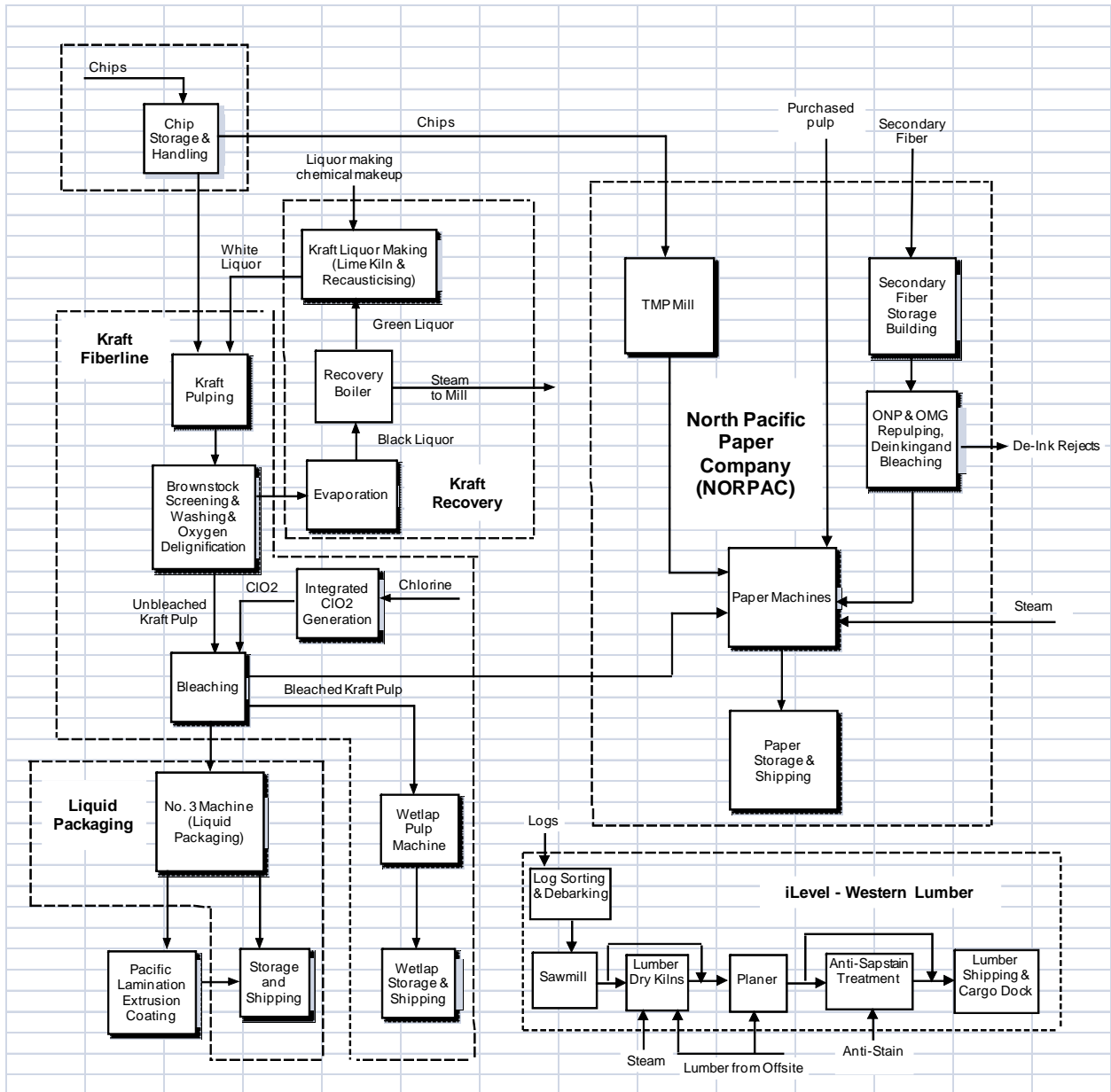
Site plan and process flow diagram

The following process flow diagrams and site schematics were provided by Weyerhaeuser NR Company. The first few process flow diagrams show an overview of the air operating permit source. The following diagrams provide more details on the processes used at the Longview facility. The last two schematics provide a site plan for the facility.

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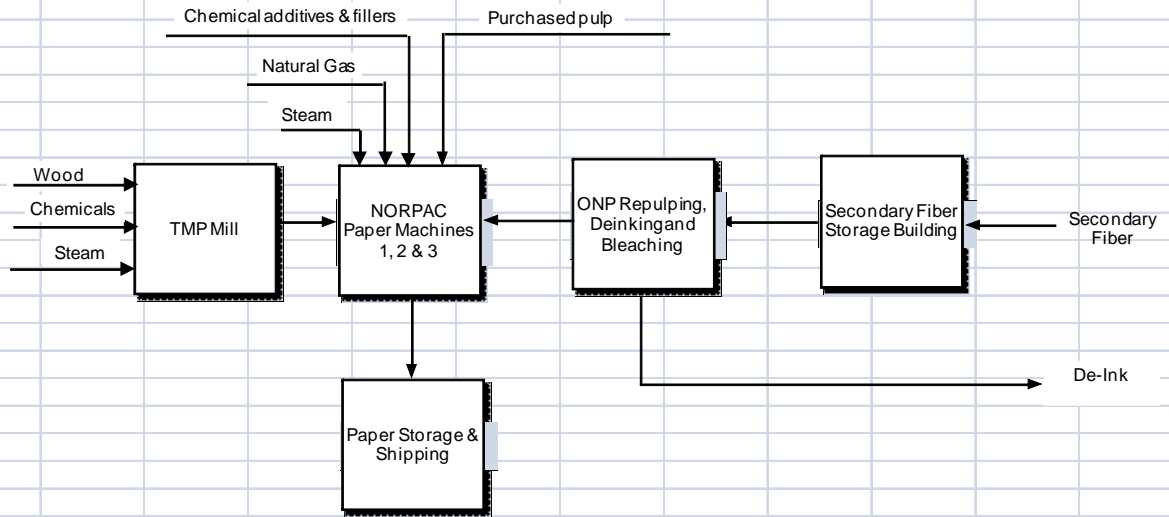
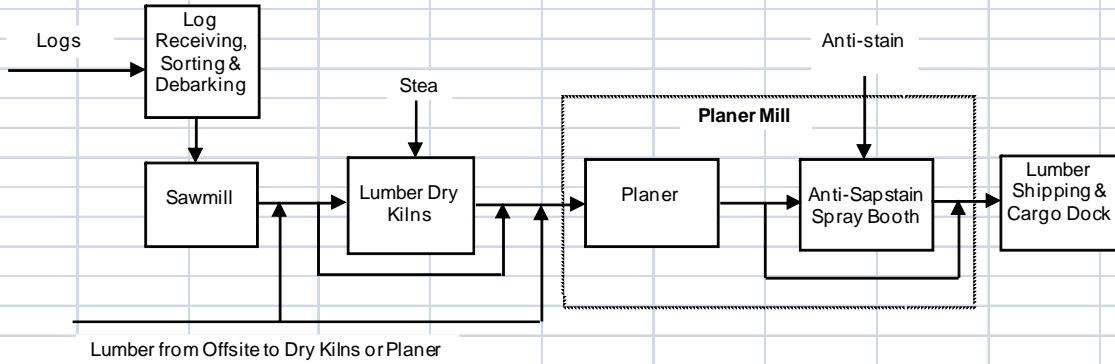
Weyerhaeuser Longview Air Operating Permit (AOP) Support Document



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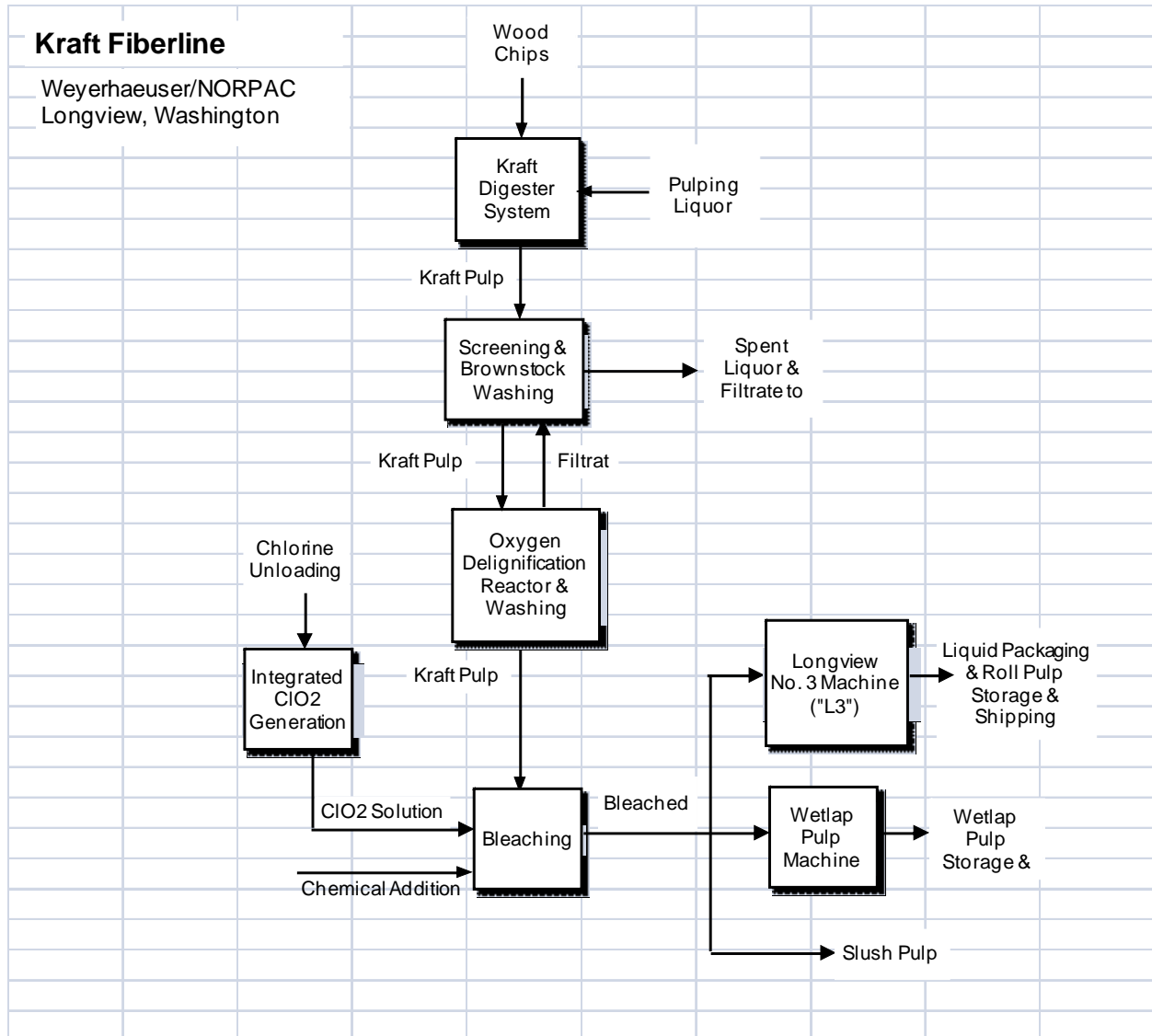
iLevel Process Flow Diagram

Weyerhaeuser/NORPAC
Longview, Washington

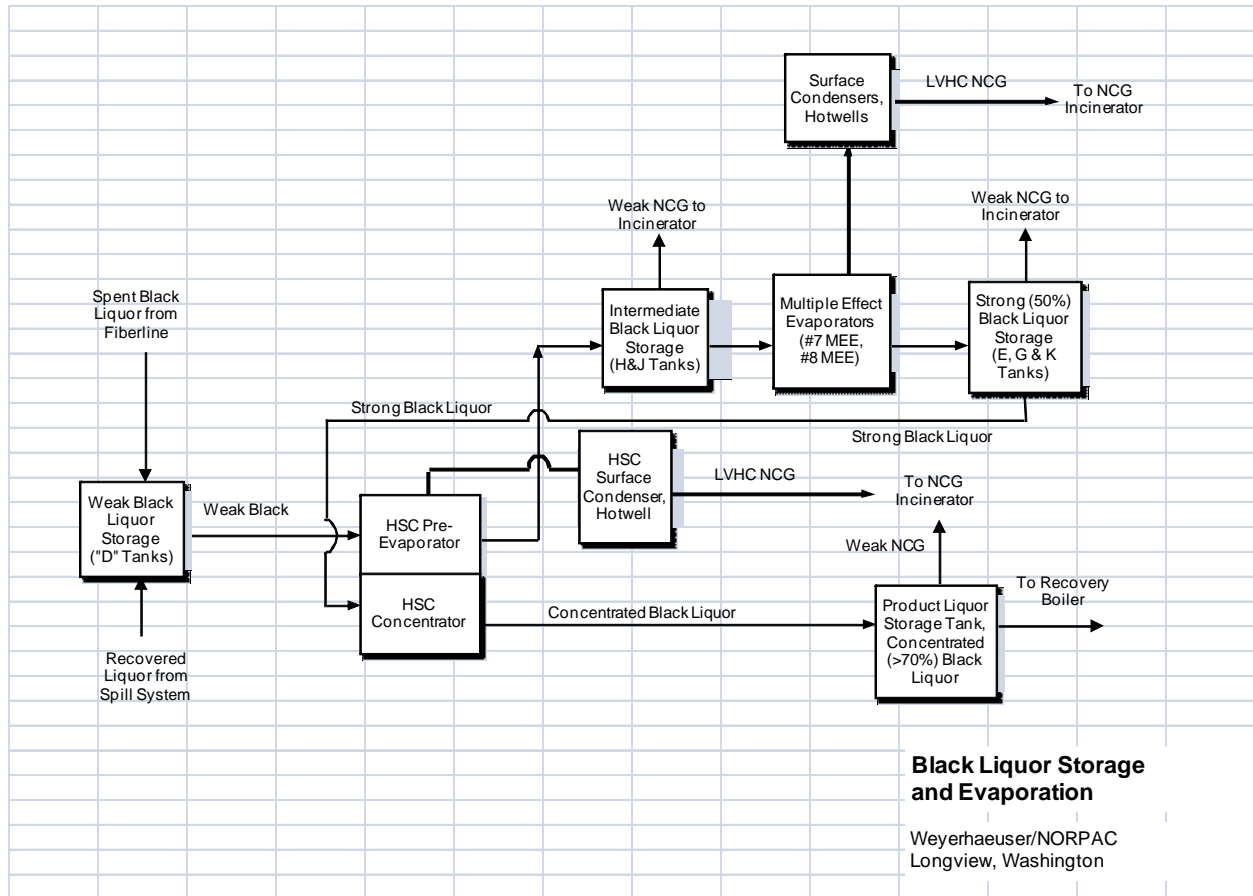


NORPAC
Weyerhaeuser/NORPAC
Longview, Washington

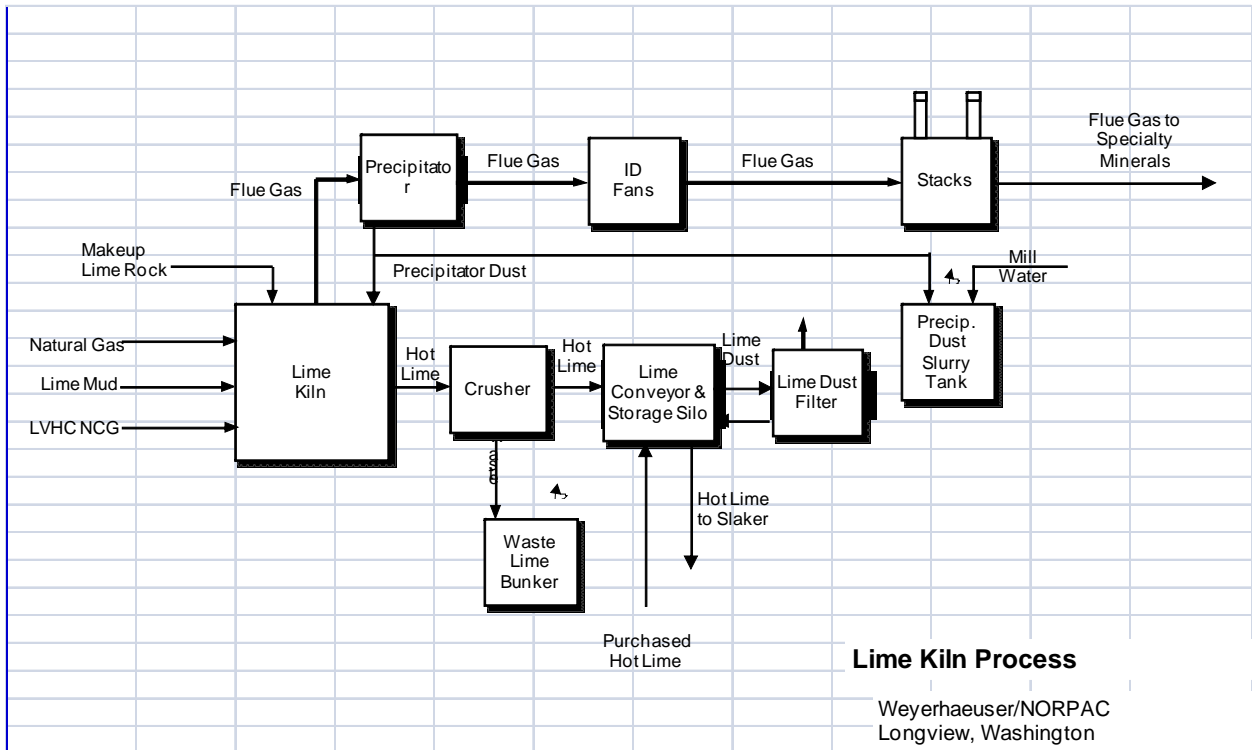
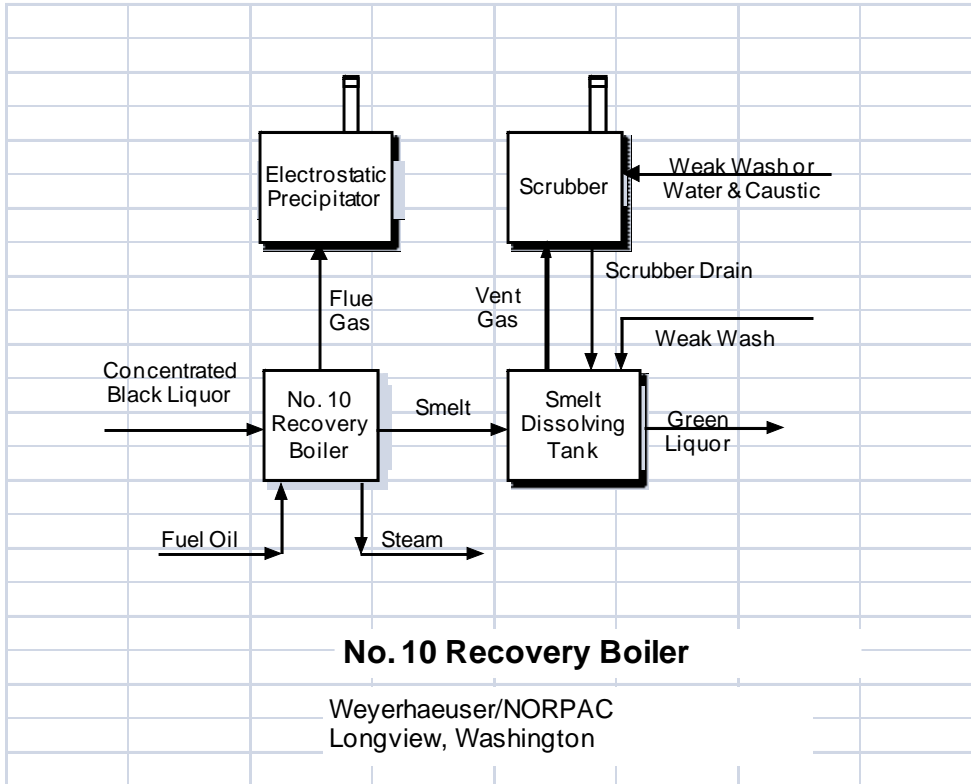
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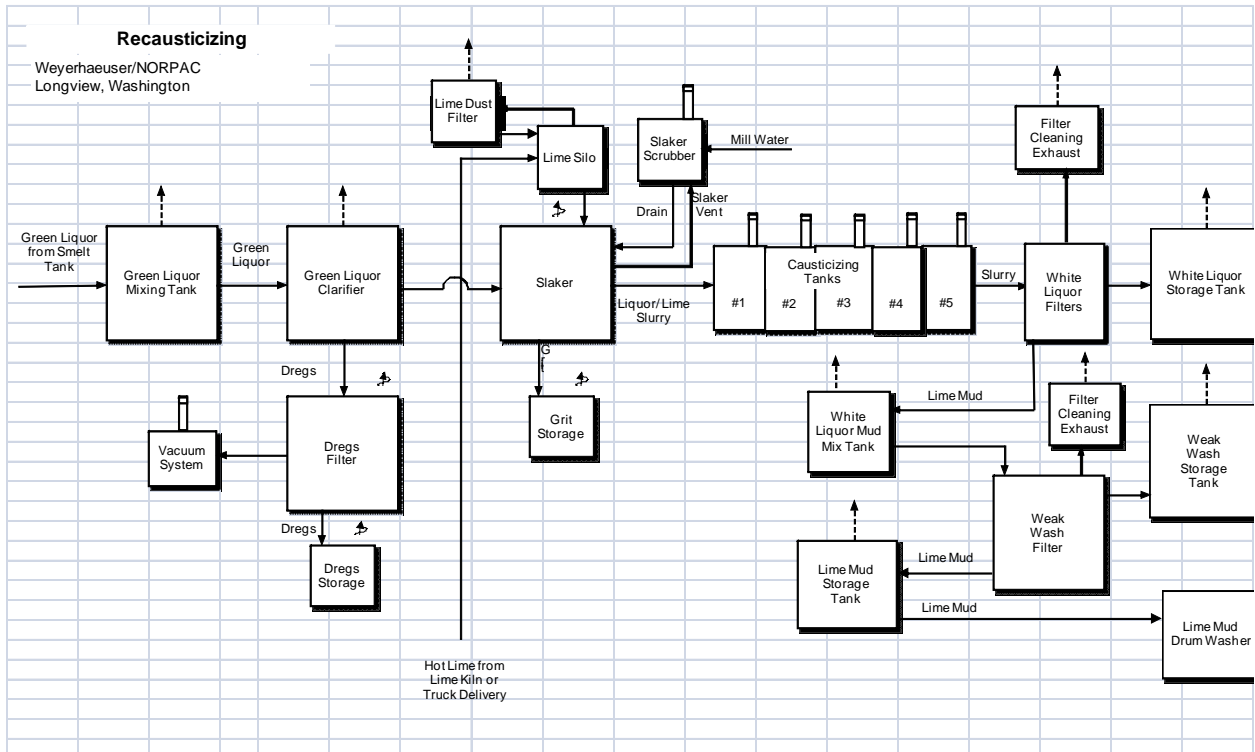
Weyerhaeuser Longview Air Operating Permit (AOP) Support Document



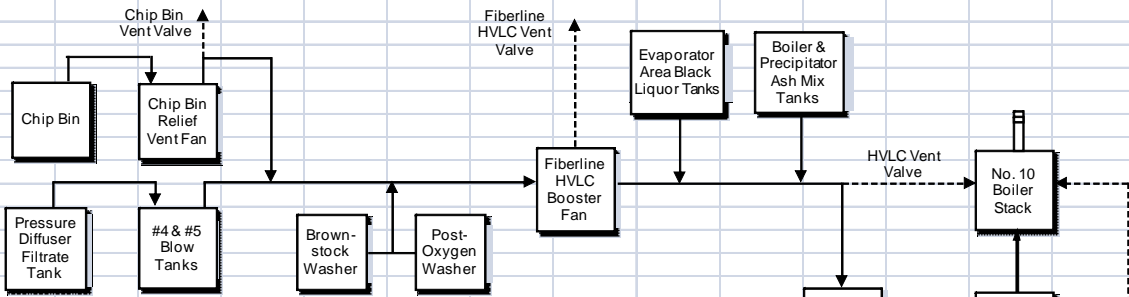
Weyerhaeuser Longview Air Operating Permit (AOP) Support Document



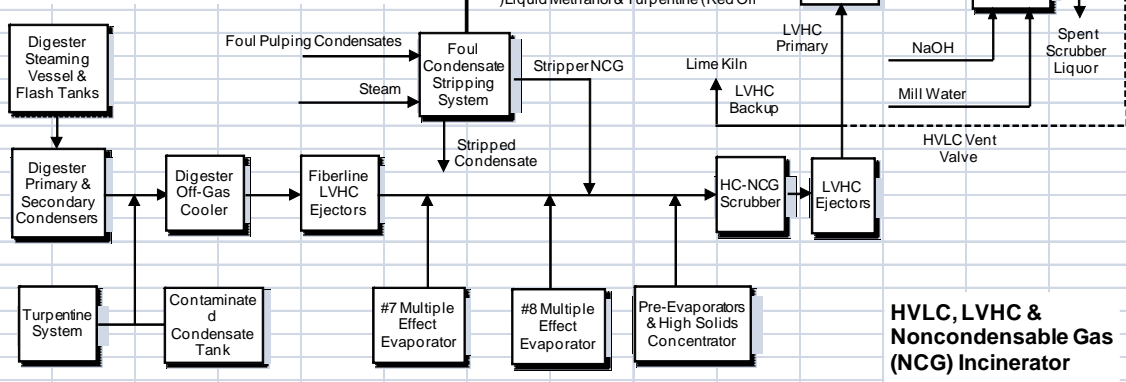
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High-Volume, Low Concentration (HVLC) NCG:



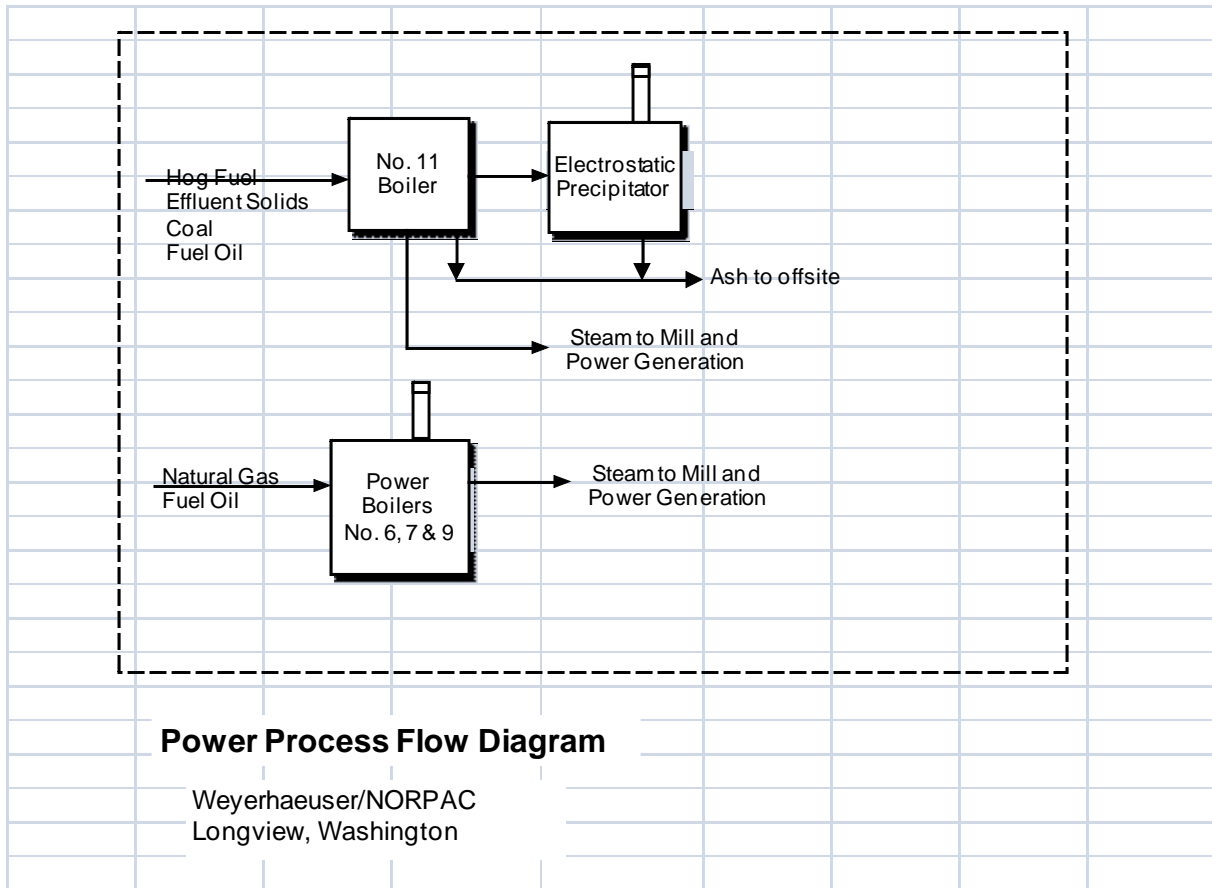
Low-Volume, High Concentration (LVHC) NCG:



HVLC, LVHC & Noncondensable Gas (NCG) Incinerator

Weyerhaeuser/NORPAC
Longview, Washington

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Appendix D

Comments received, and Ecology's response to comments.

Weyerhaeuser NR Company submitted the following comments on October 26, 2009.

1. General Formatting – Table Headers.

Discussion – On tables that carry over from one page to another, the header row appears on the first page but not on subsequent pages.

Recommendation – Format tables so that header rows show on each page.

Ecology's response: Some headers were able to be added, and were changed. However, the other tables' format and location on the page precluded all tables from having the headers added in the middle of tables.

2. Page 6, Condition B introduction: change "bleach Plant" to "Bleach Plant" for consistency.

Ecology's response: The small "b" in "Bleach Plant" was capitalized.

3. Pages 18 – 19, Conditions E.5, E.6, E.7 & E.9 – Change "COM" to "CEM."

Ecology's response: "COM" was changed to "CEM."

4. Pages 21, 23 & 25, Conditions H.24, H.25, I.11, I.12, I.13, K.4, & K.5 – Review & update applicable requirement citations.

Discussion – the applicable requirement section for each of these conditions refers to 40 CFR 63.864(a)-(c). These citations were taken from the NESHAP Subpart MM rule published on July 19, 2001. We believe these citations were correct at the time we submitted our AOP Renewal Application. However, late in our review of this Draft AOP, we found that Subpart MM has been revised and 40 CFR 63.864(a)-(c) are currently listed as "reserved."

Recommendation – Review Subpart MM to confirm proper regulatory citations and update the Draft AOP language as appropriate.

Ecology's response: Ecology agrees, and citation in permit is as "40 CFR 63.864(k)..." because section (a) – (c) is now listed as "reserved."

5. Page 27, Conditions M.1, M.2, M.3 – Delete

Discussion – the language listed in these conditions are not applicable to the Planer Mill or Lumber Drying Kilns. These sections appear to be word processing artifacts from copying and

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pasting Section L (Slaker Vent Scrubber Stack) to create a new Section M for the Planer Mill & Lumber Drying Kilns.

Recommendation – Delete Conditions M.1, M.2 and M.3. Revise numbering for Conditions M.4 – M.8, renaming them as Conditions M.1 – M.5.

Ecology's response: Ecology agrees, and change has been made.

6. Page 29, Condition N.1 – Typographical correction, change “stqart” to “start.”

Ecology's response: Change has been made.

7. Page 29, Condition N.2 – Delete misplaced opacity limit text.

Discussion – The opacity standard listed in the Limit section does not apply to the Sawmill and appears to be a word processing artifact (copied from Section L).

Recommendation – Delete the following text: “Average \leq 25 % opacity for more than 6 consecutive minutes in any 60 – minute period.”

Ecology's response: Ecology agrees and change has been made.

8. Page 29, Condition O – Spelling correction, “burt” to “but.”

Ecology's response: Change has been made.

9. Pages 30 – 31, Section O – Typographical corrections to table of conditions.

Discussion – the Section O table lists Conditions as J.1 – J.12, and all Applicable Requirements citations contain and extra “63.”

Recommendation – Correct condition names to O.1 – O.12 and delete extra “63.” in citations.

Ecology's response: Ecology agrees, and changes made.

10. Page 33, Condition Q.8 – Grammar and spelling. Change “emissions. Ecology” to “emissions, Ecology,” and “reqyire” to “require.”

Ecology's response: Changes made.

11. Page 34, Condition Q.10 – Change reference from “Condition S.9” to “Condition Q.9.”

Ecology's response: Change made.

12. Page 36, Facility-wide general requirements – Consider explicitly recognizing threshold-based Insignificant Emission Units.

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Discussion – Consistent with WAC 173-401-533, the permit renewal application identified a number of insignificant emission units and activities based on size or production rate. This category/type of IEU is not explicitly addressed in the draft permit. Weyerhaeuser wants to ensure that these IEUs/activities are properly recognized and regulated in this permit.

Recommendation – Consider adding as statement to the introduction to this section which states, “Activities listed in the permit renewal application (page 3 – 32, Air Operating Permit 000012-4 Renewal Application, Greg Bean to Marc Crooks September 16, 2005) are recognized as insignificant emission units. Insignificant emission units or activities, however ...”

Ecology’s response: Ecology agrees, and language recommended was added.

13. Page 38, Condition 22 – Revise list of Unit Specific Conditions referenced.

Discussion – the draft AOP refers to “specific emission units in conditions A through L,” and references the State Kraft Mill Rule as the underlying applicable requirement. This list is not limited to Kraft Mill Rule regulated units, but neither does it refer to all specific emission unit conditions in the Permit.

Recommendation – Clarify whether this condition applies to all specifically listed emission units in the Permit, or only to those units subject to the Kraft Pulp Mill Rule, and revise the referenced conditions accordingly.

Ecology’s response: Ecology changed the language to only refer to those units subject to the Kraft Pulp Mill Rule.

14. Page 39, Condition 30 – Revise list of unit specific conditions from “A through I” to “A through N.”

Discussion – The draft references unit specific conditions from “A through I,” but presumably the condition is intended to reference all unit specific conditions A through Q.

Recommendation – Revise list of unit specific conditions as appropriate.

Ecology’s response: Condition 30 revised to include conditions A through Q.

15. Page 42, Permit Shield – Correct references in WAC.

Discussion – The section references WAC 173-401-503 and WAC 1763-401-503(3).

Recommendation – Correct references to WAC 173-401-530 and WAC 173-401-530(3).

Ecology’s response: Change made.

16. Page 43, Appendix A – Inapplicable Requirements

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Discussion – The sixth and seventh inapplicable requirements listed are currently inapplicable, but these will become applicable on January 1, 2010 when Weyerhaeuser complete the purchase of Pacific Lamination.

Recommendation – No change recommended at present.

Ecology's response: Ecology agrees with recommendation, and will address any changes to the permit when the sale actually closes in early 2010.

17. Page 44, Inapplicable Requirements, WAC 173-400-151 – Update language regarding BART.

Discussion – Draft reads “Facility has not been identified as a source impacting a Class I area.” This was accurate when our Renewal Application was submitted, but the status has changed.

Recommendation – Update the language as follows: “The Weyerhaeuser Longview Facility has completed a BART evaluation for BART eligible units, and Ecology has proposed BART emission limits for the site, but there are currently no applicable retrofit requirements for visibility protection at the site.”

Ecology's response: Ecology agrees, and change in language made.

18. Support Document – Formatting. Change page numbering from “X of X” to “X of Y.”

Ecology's response: Page numbering change made.

19. Support Document, Page 18, “18. NESHAPS Standards” – Review and update Subpart MM language as appropriate; see Comment 4 above.

Ecology's response: Ecology agrees, and the Support Document now states that 40 CFR 63.864(a) – (c) are currently listed as “reserved” and the citation is now “40 CFR 63.864(k)....”

20. Support Document, Page 25, Inapplicable Requirements for approval to operate Pacific Lamination (PacLam) – The document correctly states that “Weyerhaeuser does not own or operate this source”, but Ecology might add language indicating that PacLam’s permit conditions will become applicable requirements when Weyerhaeuser NR’s imminent purchase of PacLam is completed (1/1/10 closure date).

Ecology's response: Ecology agrees, and added language to note pending sale.

21. Support Document, Page 26, Inapplicable Requirements for POWC NESHAP – Document correctly states that this is currently inapplicable, but Ecology might note that this requirement will become applicable after Weyerhaeuser NR’s imminent purchase of Pacific Lamination (1/1/10 closure date).

Ecology's response: Ecology agrees, and added language to note pending sale.