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January 23, 2009

Merley McCall
WA Dept of Ecology
300 Desmond Drive
P.O. Box 47600
Olympia, WA 98504-7600

Subject: Ecology Agreed Order 5771, Section III B.1

Merley-

Enclosed is the data to fulfill PTPC's obligation of Section B.1. This information is due within 180 days of the order or January 26, 2009. The results are reported as required by the order ["...by SCC code (process) applicable to each unit on forms provided by Ecology."].

In addition to providing this data to Ecology, PTPC has been working the last few months with the USEPA Office of Air Quality. This data was modeled using the same methodology as used for the Residual Risk program. EPA also used this data as part of their Residual Risk review. My understanding is the results demonstrated that our mill posed a low risk for both non-cancer and cancer. Beth Palma of EPA will be sending a summary of results to you directly.

The last item due to you under Section B.3 of the Order is *Amended ASB Emissions Estimate Plan*. The draft of the plan is under review and will be finalized and sent to you next week.

Please let me know if you have any questions.

Sincerely-

Eveleen Muehlethaler
(360) 379-2112

cc: Beth Palma, EPA Office of Air Quality
Annika Wallendahl, PTPC
Svend Brandt-Erichsen, Marten Law Group

Sent 1/23/09 CERTIFIED MAIL 7003 3110 0002 0073 9833

Plant Number: S - 031 - 0001 Pt Townsend Paper
Point Number: 02 Kraft Recovery Furnace

Segment Number: 01 **SCC Code:** 30700110

TOXIC POLLUTANT EMISSIONS (Specify in pounds per year)

Toxic Pollutant	CAS or EPA #	Emissions in lbs/yr			Estimation Code[1]		
		2002	2005	2007	2002	2005	2007
Acetaldehyde	75070	140	150	150	12	12	12
Acrolein	107028	88	94	91	12	12	12
Arsenic Compounds	93	0	0	0	12	12	12
Benzene	71432	220	230	220	12	12	12
Beryllium Compounds	109	0	0	0	12	12	12
Cadmium Compounds	125	3	2	1	10	10	10
Chromium Compounds	136	6	7	7	12	12	12
Cresol	1319773	8800	9400	9100	12	12	12
Formaldehyde	50000	2600	2800	2700	12	12	12
Hydrochloric acid (HCl)	7647010	18600	19800	19300	12	12	12
Manganese Compounds	198	18	19	18	12	12	12
Mercury Compounds	199	0	0	0	12	12	12
Methanol	67561	14900	15900	15400	12	12	12
Naphthalene	91203	88	94	91	12	12	12
Nickel Compounds	226	11	12	11	12	12	12
Phenol	108952	3720	3960	3850	12	12	12
POM 71002 minus Naphthalene		27	28	28	12	12	12
Propionaldehyde	123386	0	0	0	12	12	12

[1] **Emissions Estimation Method Codes (use for 2002 – 2007)**

Method	code	Method	code	Method	code
CEMS	1	EPA speciation profile	5	state/local emission factor	9
engineering judgment	2	state/local speciation profile	6	site-specific emission factor	10
material balance	3	manufacturer specification	7	vender emission factor	11
stack test	4	EPA emission factor	8	trade group emission factor	12

Plant Number: S - 031 - 0001 Pt Townsend Paper
Point Number: 03 Smelt Tank

Segment Number: 01 **SCC Code:** 30700105

TOXIC POLLUTANT EMISSIONS (Specify in pounds per year)

Toxic Pollutant	CAS or EPA #	Emissions in lbs/yr			Estimation Code[1]		
		2002	2005	2007	2002	2005	2007
Acetaldehyde	75070	304	324	315	12	12	12
Acrolein	107028	3	3	3	12	12	12
Arsenic Compounds	93	0	0	0	12	12	12
Benzene	71432	0	0	0	12	12	12
Beryllium Compounds	109	0	0	0	12	12	12
Cadmium Compounds	125	0	0	0	12	12	12
Chromium Compounds	136	1	1	1	12	12	12
Cresol	1319773	659	703	683	12	12	12
Formaldehyde	50000	1180	1260	1230	12	12	12
Hydrochloric acid (HCl)	7647010	0	0	0	12	12	12
Manganese Compounds	198	5	4	4	12	12	12
Mercury Compounds	199	0	0	0	12	12	12
Methanol	67561	3720	3960	3850	12	12	12
Naphthalene	91203	169	180	175	12	12	12
Nickel Compounds	226	2	2	2	12	12	12
Phenol	108952	253	270	263	12	12	12
POM 71002 minus Naphthalene		193	206	200	12	12	12
Propionaldehyde	123386	0	0	0	12	12	12

[1] **Emissions Estimation Method Codes (use for 2002 – 2007)**

Method	code	Method	code	Method	code
CEMS	1	EPA speciation profile	5	state/local emission factor	9
engineering judgment	2	state/local speciation profile	6	site-specific emission factor	10
material balance	3	manufacturer specification	7	vender emission factor	11
stack test	4	EPA emission factor	8	trade group emission factor	12

Plant Number: S - 031 - 0001 Pt Townsend Paper
Point Number: 04 Lime Kiln

Segment Number: 01 **SCC Code:** 30700106

TOXIC POLLUTANT EMISSIONS (Specify in pounds per year)

Toxic Pollutant	CAS or EPA #	Emissions in lbs/yr			Estimation Code[1]		
		2002	2005	2007	2002	2005	2007
Acetaldehyde	75070	320	350	339	12	12	12
Acrolein	107028	1	1	1	12	12	12
Arsenic Compounds	93	0	0	0	12	12	12
Benzene	71432	19	21	20	12	12	12
Beryllium Compounds	109	0	0	0	12	12	12
Cadmium Compounds	125	9	3	2	10	10	10
Chromium (VI)	136	1	1	2	12	12	12
Cresol	1319773	407	445	431	12	12	12
Formaldehyde	50000	320	350	339	12	12	12
Hydrochloric acid (HCl)	7647010	12	13	13	12	12	12
Manganese Compounds	198	40	19	18	12	12	12
Mercury Compounds	199	0	0	0	12	12	12
Methanol	67561	698	763	740	12	12	12
Naphthalene	91203	756	826	801	12	12	12
Nickel Compounds	226	13	6	6	12	12	12
Phenol	108952	16	17	17	12	12	12
POM 71002 minus Naphthalene		3	4	4	12	12	12
Propionaldehyde	123386	0	0	0	12	12	12

[1] **Emissions Estimation Method Codes (use for 2002 – 2007)**

Method	code	Method	code	Method	code
CEMS	1	EPA speciation profile	5	state/local emission factor	9
engineering judgment	2	state/local speciation profile	6	site-specific emission factor	10
material balance	3	manufacturer specification	7	vender emission factor	11
stack test	4	EPA emission factor	8	trade group emission factor	12

Plant Number: S - 031 - 0001 Pt Townsend Paper
Point Number: 22 Boiler #10 Hog Fuel Res Oil

Segment Number: 01 **SCC Code:** 10200401

TOXIC POLLUTANT EMISSIONS (Specify in pounds per year)

Toxic Pollutant	CAS or EPA #	Emissions in lbs/yr			Estimation Code[1]		
		2002	2005	2007	2002	2005	2007
Acetaldehyde	75070	0	0	0	12	12	12
Acrolein	107028	0	0	0	12	12	12
Arsenic Compounds	93	2	2	3	10	10	10
Benzene	71432	1	1	1	12	12	12
Beryllium Compounds	109	0	0	0	10	10	10
Cadmium Compounds	125	5	6	5	10	10	10
Chromium Compounds	136	8	11	14	10	10	10
Cresol	1319773	0	0	0	12	12	12
Formaldehyde	50000	72	96	133	12	12	12
Hydrochloric acid (HCl)	7647010	31	40	27	10	10	10
Manganese Compounds	198	9	13	17	12	12	12
Mercury Compounds	199	0	0	0	12	12	12
Methanol	67561	0	0	0	12	12	12
Naphthalene	91203	3	5	6	12	12	12
Nickel Compounds	226	52	76	78	12	12	12
Phenol	108952	0	0	0	12	12	12
POM 71002 minus Naphthalene		0	0	0	12	12	12
Propionaldehyde	123386	0	0	0	12	12	12

[1] **Emissions Estimation Method Codes (use for 2002 – 2007)**

Method	code	Method	code	Method	code
CEMS	1	EPA speciation profile	5	state/local emission factor	9
engineering judgment	2	state/local speciation profile	6	site-specific emission factor	10
material balance	3	manufacturer specification	7	vender emission factor	11
stack test	4	EPA emission factor	8	trade group emission factor	12

Plant Number: S - 031 - 0001 Pt Townsend Paper
Point Number: 22 Boiler #10 Hog Fuel Res Oil

Segment Number: 02 **SCC Code:** 10200902

TOXIC POLLUTANT EMISSIONS (Specify in pounds per year)

Toxic Pollutant	CAS or EPA #	Emissions in lbs/yr			Estimation Code[1]		
		2002	2005	2007	2002	2005	2007
Acetaldehyde	75070	381	425	283	12	12	12
Acrolein	107028	129	144	96	12	12	12
Arsenic Compounds	93	7	8	6	10	10	10
Benzene	71432	447	499	332	12	12	12
Beryllium Compounds	109	3	5	4	10	10	10
Cadmium Compounds	125	32	69	36	10	10	10
Chromium Compounds	136	11	12	8	10	10	10
Cresol	1319773	0	0	0	12	12	12
Formaldehyde	50000	1250	1410	1010	12	12	12
Hydrochloric acid (HCl)	7647010	37	44	16	10	10	10
Manganese Compounds	198	72	87	63	12	12	12
Mercury Compounds	199	0	0	0	12	12	12
Methanol	67561	1420	1590	1060	12	12	12
Naphthalene	91203	169	185	162	12	12	12
Nickel Compounds	226	16	17	12	12	12	12
Phenol	108952	15	17	11	12	12	12
POM 71002 minus Naphthalene		59	92	45	12	12	12
Propionaldehyde	123386	101	113	75	12	12	12

[1] **Emissions Estimation Method Codes (use for 2002 – 2007)**

Method	code	Method	code	Method	code
CEMS	1	EPA speciation profile	5	state/local emission factor	9
engineering judgment	2	state/local speciation profile	6	site-specific emission factor	10
material balance	3	manufacturer specification	7	vender emission factor	11
stack test	4	EPA emission factor	8	trade group emission factor	12

Plant Number: S - 031 - 0001 Pt Townsend Paper
Point Number: 24 Package Boiler - Standby Only

Segment Number: 01 **SCC Code:** 10200401

TOXIC POLLUTANT EMISSIONS (Specify in pounds per year)

Toxic Pollutant	CAS or EPA #	Emissions in lbs/yr			Estimation Code[1]		
		2002	2005	2007	2002	2005	2007
Acetaldehyde	75070	0	0	0	12	12	12
Acrolein	107028	0	0	0	12	12	12
Arsenic Compounds	93	2	2	2	10	10	10
Benzene	71432	1	1	1	12	12	12
Beryllium Compounds	109	0	0	0	10	10	10
Cadmium Compounds	125	5	4	3	10	10	10
Chromium Compounds	136	8	8	8	10	10	10
Cresol	1319773	0	0	0	12	12	12
Formaldehyde	50000	72	65	78	12	12	12
Hydrochloric acid (HCl)	7647010	1520	1360	1550	10	10	10
Manganese Compounds	198	9	9	10	12	12	12
Mercury Compounds	199	0	0	0	12	12	12
Methanol	67561	0	0	0	12	12	12
Naphthalene	91203	3	3	3	12	12	12
Nickel Compounds	226	52	51	46	12	12	12
Phenol	108952	0	0	0	12	12	12
POM 71002 minus Naphthalene		0	0	1	12	12	12
Propionaldehyde	123386	0	0	0	12	12	12

[1] **Emissions Estimation Method Codes (use for 2002 – 2007)**

Method	code	Method	code	Method	code
CEMS	1	EPA speciation profile	5	state/local emission factor	9
engineering judgment	2	state/local speciation profile	6	site-specific emission factor	10
material balance	3	manufacturer specification	7	vender emission factor	11
stack test	4	EPA emission factor	8	trade group emission factor	12