TECHNICAL SUPPORT DOCUMENT FOR
PORT TOWNSEND PAPER CORPORATION
PSD 96-01A, AMENDMENT 1

Prepared by

Air Quality Program
Washington State Department of Ecology
Olympia, Washington

June 15, 2016
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1. EXECUTIVE SUMMARY

The Prevention of Significant Deterioration (PSD) permit program is required under state and federal law. The objective of the PSD program is to prevent significant adverse environmental impact from emissions into the atmosphere by a proposed new or modified source. The Port Townsend Paper Corporation (PTPC) was previously issued PSD permit No. 96-01A on May 20, 1998. PTPC has requested an amendment to this permit to allow their package boiler to burn natural gas instead of reprocessed fuel oil (RFO).

This amendment will amend the PSD permit by:

1. Changing Specific Operating Requirements V.A. to add language to allow the use of natural gas as fuel for the package boiler.
2. Changing Specific Operating Requirements V.B. to not allow the use of RFO for the package boiler.
3. Requiring performance testing for the new burner as currently described in the permit.
4. Adding emission limits in Emission Limits III.A. for NOX.
5. Adding emission limits in Emission Limits III.B. for PM, PM2.5, and PM10.

Ecology will have a public comment period that opens on May 4, 2016, and closes on June 10, 2016. In addition, Ecology will hold a public meeting and hearing at Fort Worden, Washington, on June 7, 2016.

2. INTRODUCTION

2.1. The Permitting Process

PSD permitting requirements in Washington State are established in Title 40, Code of Federal Regulations (CFR) § 52.21; Washington Administrative Code (WAC) 173-400-700 through 750.

PSD permit No. 96-01A was issued on May 20, 1998. The mill operates under Air Operating Permit Number 000092-2 issued by Ecology on January 17, 2007, and reissued on April 28, 2010.

The revised PSD application for the PTPC Boiler MACT – Package Boiler Natural Gas Conversion Project was received by Ecology on April 19, 2016. The PSD permit amendment application was considered complete on April 19, 2016.
2.2. Site and Facility Description

2.2.1. Site description

The PTPC Port Townsend mill is a Kraft pulp and paper facility in Port Townsend, Jefferson County, Washington. The facility is located at 100 Mill Road, Port Townsend, Washington 98368. The mill is located at 48° 05’ 41” north longitude and 122° 47’ 46” west latitude. The mill is located in a Class II area that is designated as “attainment or unclassifiable” for the purpose of PSD permitting for all pollutants. The project will be located on the mill site directly adjacent to the current boiler building.

2.2.2. Facility description

PTPC has a hog fuel boiler and a recovery furnace. The heat from the recovery furnace and hog fuel boiler is used to produce steam for use in the facility. An additional source of steam for the mill is a package boiler that uses RFO. The mill has requested to change the fuel used in the package boiler from RFO to natural gas.

The PTPC Port Townsend mill operates paper machines, pulp digesters, recovery furnace, power boilers, lime kiln, and smelt dissolving tanks these pieces of equipment are the major sources of air pollution. The facility does not have a pulp bleaching plant.

PTPC’s proposed project plans to install systems to allow natural gas to displace RFO as the sole fuel combusted in the package boiler. The natural gas conversion project will equip the package boiler with a new burner designed to combust natural gas. The gas will be delivered by truck as compressed natural gas (CNG). The project will install in the package boiler a new 250 million British thermal units per hour (MMBtu/hr) Coen Variflame burner designed to handle only natural gas. The new burner will not be capable of firing RFO. This change will enable the package boiler to meet boiler MACT requirements. The new burner will have the same heat input rating as the current burner, but modern burner design has created multi-zone combustion that improves efficiency while decreasing emissions.

3. PSD

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

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

An emission source is subject to the PSD permitting program if the new installation either is a major modification of an existing major source, defined in Chapter 173-400-720 WAC. PTPC is classified as a major stationary source under the PSD permitting program because the facility has the potential to emit greater than 100 tons per year (tpy) of at least one PSD pollutant. PTPC’s proposed Boiler MACT – Package Boiler Natural Gas Conversion project is considered a physical change in the method of operation of an existing major source. PTPC has an existing PSD permit, and is required to submit an application for amending their PSD permit.

This PSD permit amendment will address the changes needed to the existing PSD permit to establish new operating conditions for the package boiler to allow the mill to meet the boiler Maximum Achievable Control Technology (MACT) rule requirements. EPA Region 10 has granted a 6-month extension for boiler MACT compliance on the package boiler to allow the conversion to CNG for MACT compliance on that unit. As noted above in the PSD analysis section of this TSD, Ecology has reviewed the information submitted by PTPC and finds that the total project will not increase any emissions past the PSD programs Significant Emission Rates (SERs). Therefore, the proposed Natural Gas Conversion Project does not trigger new PSD permitting for the project, and instead requires only an amendment to the existing PSD permit.

The PSD permit program is required under state and federal law. The objective of the PSD program is to prevent significant adverse environmental impact from emissions into the atmosphere by a proposed new or modified source. The PTPC was previously issued PSD permit No. 96-01A issued on May 20, 1998. PTPC has requested an amendment to this permit.

### 3.1. PSD Analysis

PTPC chose to use March 2006 through March 2008 as their consecutive 24-month period in the previous 10 years for their baseline emission rate. With an efficient natural gas burner, PTPC plans to use the package boiler for a greater portion of steam production. This increase in use of the package boiler will also displace up to 55 percent of RFO used in the recovery boiler. PTPC estimates future use of the package boiler at 1,362 MMBtu/day. The average annual heat input for the baseline period was 1,403 MMBtu/day. After refueling to natural gas, the criteria emissions are expected to decrease. Table 1 below shows the project’s baseline emissions, projected actual emissions, and net increase. This project will result in the environment realizing a decrease in the amount of NOX, PM, VOC, and CO emissions from the mill.
The conversion from RFO to natural gas will reduce PM because of the new clean fuel.

Ecology concludes that the PSD pollutants will not be increased.

Ecology proposes to amend PSD Permit Number PSD 96-01A to allow the package boiler to use natural gas.

4. PERMIT AMENDMENT

This amendment will amend the PSD permit by:

1. Revising the Specific Operating Requirements to add language to allow the use of natural gas as fuel for the package boiler.

2. Revising the Specific Operating Requirements to add language removing the use of reprocessed fuel oil for the package boiler.

3. Add BACT Emission Limits for NO\textsubscript{X} and PM.

4. Revising Emission Limits for NO\textsubscript{X} and PM.

5. PERMIT LIMITS

BACT for NO\textsubscript{X} and PM:

In regards to NO\textsubscript{X}, Ecology reviewed the emissions calculations submitted by PTPC. The NO\textsubscript{X} emissions will decrease 5.49 tpy. The applicant reported the controls listed in Part 1.4 of AP-42 designed to reduce NO\textsubscript{X} is low NO\textsubscript{X} control technology using good combustion controls while firing natural gas using a low NO\textsubscript{X} burner. Ecology has reviewed the applicant’s findings and reviewed the RBLC database, and concurs that using a low NO\textsubscript{X} burner and natural gas is BACT.

\begin{table}
\centering
\begin{tabular}{|l|c|c|c|}
\hline
 & NO\textsubscript{X} & VOC & CO \\
 & (tpy) & (tpy) & (tpy) \\
\hline
3/06-3/08 baseline actual emissions & 61.4 & 4.70 & 9.19 \\
Projected actual emissions & 55.9 & 3.74 & 8.93 \\
Net increase (tpy) & (5.5) & (0.96) & (0.26) \\
\hline
\end{tabular}
\caption{Annual Emission Impacts\textsuperscript{1,2}}
\end{table}

\textsuperscript{1} AP-42 Tables 1.3-1 through 1.3-9 list emissions for oil firing, with #4 or #6 oil being the closest to RFO. The package boiler is classified as a "large boiler" and is wall-fired. AP-42 Tables 1.4-1 through 1.4.4 list emissions for gas-fired boilers.

\textsuperscript{2} AP-42 tables for large boilers show oil emissions for NO\textsubscript{X} at 32 lb/gal. Package boiler NO\textsubscript{X} is based on CEMS data at 0.24 lb/MMBtu NO\textsubscript{X}. The natural gas burner is guaranteed for 0.225 lb/MMBtu NO\textsubscript{X}. AP-42 VOC oil factors are 0.28 lb/MMBtu which equals 0.002 lb/MMBtu VOC/MMBtu.
for NO\textsubscript{X}. The NO\textsubscript{X} emission limits will be an emission rate of 0.2 lb/MMBtu based on a 30-day rolling average, and 50 tons per calendar year as per 40 CFR 60.44(b).

In regards to PM, Ecology reviewed the emissions calculations submitted by PTPC. PM condensable decreases by 1.37 tpy, and the PM filterable decreases by 13.9 tpy. So, the total PM decrease is the sum of the condensable and filterable PM, which is a decrease of 15.27 tpy. BACT for this project will be considered using natural gas and good combustion practices. Emissions of PM shall not exceed 10 tons per calendar year.

<table>
<thead>
<tr>
<th>Burner equipment</th>
<th>Emission Rate (lb/MMBtu)</th>
<th>Total Cost $</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>NO\textsubscript{X}</td>
<td>CO</td>
</tr>
<tr>
<td>Coen Variflame</td>
<td>0.15</td>
<td>0.0359</td>
</tr>
<tr>
<td>Andritz</td>
<td>0.225</td>
<td>0.0359</td>
</tr>
<tr>
<td>Turbulent diffusion</td>
<td>0.065</td>
<td>0.0359</td>
</tr>
<tr>
<td>ZEECO</td>
<td>0.07</td>
<td>0.0359</td>
</tr>
</tbody>
</table>

PTPC has chosen Coen Variflame to be their vendor because of the equipment’s low emission rates and cost.

The package boiler conversion to natural gas will bring the package boiler into compliance with 40 CFR Part 63 Subpart DDDDDD and the package boiler will have a new classification as a “Gas 1” unit for MACT compliance. As a Gas 1 unit, there are no numerical emissions limits applicable, as Gas 1 units are defined as compliance for Boiler MACT regulations.

6. PUBLIC INVOLVEMENT

Copies of the proposed PSD permit, the technical support document, and the project application are available at:


- Washington State Dept. of Ecology
  Air Quality Program
  300 Desmond Drive
  Lacey, WA 98503

- Port Townsend Public Library
  1220 Lawrence Street
  Port Townsend, WA 98368
There was a public comment period from May 4, 2016, through June 10, 2016. A public meeting and hearing was held on June 7, 2016, at Fort Warden Commons, 200 Battery Way, Port Townsend, Washington. All comments received were considered, and Ecology’s response to comments is included in Appendix A. The comments submitted did not result in changes to the final permit amendment, or the TSD.

7. AGENCY CONTACT

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APPENDIX A. ECOLOGY’S RESPONSE TO COMMENTS

Department of Ecology
Public Hearing for
Port Townsend PSD Amendment
Held on June 7, 2016

Ecology conducted a public meeting and hearing on the proposed amendment to the Prevention of Significant Deterioration (PSD) permit number 96-01A for the Port Townsend Paper Corporation’s (PTPC) Port Townsend facility on June 7, 2016, Fort Worden, Port Townsend, Washington. Notice of this hearing was published in The Daily News on May 4, 2016. At 6:00 p.m., a public meeting on the proposed PSD permit amendment was held in conjunction with a public meeting on the Notice of Construction (NOC) permit, and the State Environmental Protection Act (SEPA) determination. A question and answer session on the proposed permits and SEPA determination was included with the public meeting. The public hearing was scheduled to follow the public meeting. At the conclusion of the public meeting, it was determined that no one was going to submit comments. Therefore, the hearing was officially opened, and then closed when no one presented comments.

A public comment period for this proposed action ran from May 4, 2016, through June 10, 2016. Written comments were received. Below are Ecology’s response to those comments.

Response to written comments submitted to Ecology by Gregg Knowles by e-mail dated May 7, 2016.

Comment: I’m totally in favor of this project as it reduces pollutants, operating costs and keeps this employer viable. The construction project also brings in local income.

Ecology response: Thank you for your comment of support. This comment did not result in a change to the PSD permit amendment, or the Technical Support Document (TSD).

Response to written comments submitted to Ecology by Kevin Scott, Engineering & Environmental Manager, Port Townsend Paper Corporation, by a letter dated May 27, 2016.

All of Mr. Scott’s comments addressed approval conditions in the proposed PSD permit amendment.
**Comment:** First Paragraph – To ensure none of the conditions from the original PSD conflict with the amended version, the last sentence should be changed from “Approval of the project is granted subject to the following conditions:” to read as “PSD Permit 96-01A is revised to read as follows:” This will help ensure this permit supersedes the 1998 version which contains conditions that are no longer relevant.

**Ecology response:** This comment is regarding the first paragraph in the approval conditions found on page 4 of the PSD permit amendment. Ecology is required to make a determination regarding PSD requirements and formally approve a project. That approval is stated in the last sentence of the paragraph. Ecology does have the goal to make their permits as clear as possible. In this case, the applicant is requesting Ecology to note that a permit amendment is revising an existing permit. Ecology will revise the text.

This comment did not result in a significant change to the permit amendment or the TSD, and will not be public noticed for a second public comment period.

**Comment:** I. Effective Date of Permit – On April 29, 2015, EPA approved the Washington PSD program into the Washington SIP. WAC 173-400-730(2)(d) specifies that once the Washington PSD program is approved into the SIP the effective date of a permit is the date of issuance of the final determination, unless Ecology specifies a different date in the permit. 40 CFR 124.15 and 124.19 describe appeals of a PSD permit issued under a delegated PSD program to the EPA Environmental Appeals Board. When EPA granted SIP approval to the Washington program the exclusive venue for appeal of a PSD permit became the PCHB. See WAC 173-400-730(4), Because of this reference to 40 CFR 124,15 and 124.19 should be removed. In addition, the text “one of the following dates:” should be replaced “with the effective date noted on the signature page.” This would also eliminate subsections A, B, and C, which should be removed.

**Ecology response:** Ecology regulations frequently reference federal regulations. It is true that Ecology is a SIP approved PSD program. The federal regulations do refer to the federal process of appeals, and that reference is not necessary. Ecology will remove the federal regulations references. However, Ecology strives to write permits that have consistent language, and one area that has been important to maintain is in the written description of just when a permit becomes effective. Several factors may influence the effective date of a permit, and Ecology will not remove subsections A, B, and C.

This comment did not result in a significant change to the permit amendment or the TSD, and will not be public noticed for a second public comment period.

**Comment:** V.C. – This section should be removed. The only performance testing required by the 1998 PSD permit was monthly testing for PM and initial performance testing for PM and NOx. This permit prescribes initial performance testing for PM and NOx in Condition V.E., and it waives monthly PM testing, in favor of a requirement to burn only natural gas. Condition V.C. should be deleted to remove the obligation to don monthly PM testing.
Ecology response: Ecology agrees that the performance testing requirement in Approval Condition V.E. prescribes performance testing. This condition is no longer necessary as the package boiler will be burning natural gas. Ecology will remove condition V.C. This comment did not result in a significant change to the permit amendment or the TSD, and will not be public noticed for a second public comment period.

Comment: V.D. – Reference to 40 CFR 60.49(b) should be changed to 40 CFR 60.49(b)(d) to more accurately reflect the regulation.

Ecology response: Ecology reviewed the citation and concluded that referring to 40 CFR 60.49b (Reporting and recordkeeping requirements) is the appropriate reference. Ecology corrected the reference in the PSD permit amendment from 40 CFR 60.49(b) to 40 CFR 60.49b to make it clearer. To make the reference 40 CFR 60.49b (d) (2), or even just 40 CFR 60.49b (d), is unnecessary.

This comment did not result in a significant change to the permit amendment or the TSD, and will not be public noticed for a second public comment period.

Comment: V.E., VI.B., and VI.E. – Condition VI.E. and the last sentence in condition VI.B. should be consolidated, deleted, and moved to V.E. as the second sentence. The new second sentence would read: “For the initial performance test, EPA Method 7E will be used for NOx, EPA Method 5 will be used to determine total PM and PM$_{10}$ shall be estimated by calculation (multiplying 0.86 times the results of the total PM).” It is helpful to have the initial performance test methods in the condition that requires the performance test. We believe the requirement form Condition VI.E. that PTPC use Methods 201A and 202 for PM$_{10}$ testing should be deleted because the emission limit (Condition III.B.) specifies Method 5 as the initial test method for the PM limit with ongoing compliance demonstrated by burning only natural gas. In addition, the reference to PM$_{2.5}$ should be removed because initial compliance is demonstrated with Method 5 and ongoing compliance is demonstrated by burning only natural gas.

Ecology response: In merging the language from the original 1998 PSD permit to the proposed language in the modern PSD permit format, the language for performance testing did become complex. Ecology finds the language suggested in your comment is clearer, and agrees to change the language in the proposed PSD permit amendment to your suggested language. This comment did not result in a significant change to the permit amendment or the TSD, and will not be public noticed for a second public comment period.

Comment: VI.D. – To eliminate any potential confusion over prior boiler operations, the words “on natural gas” should be added after boiler in the first sentence.

Ecology response: Ecology agrees that this would make the language clearer, and will “on natural gas” to the PSD permit amendment. This comment did not result in a significant change to the permit amendment or the TSD, and will not be public noticed for a second public comment period.
Comment: XI.A. and XI.B. – Reference to WAC 173-400-720(4) should be added to each section. SIP approval of the Washington PSD program means that Ecology should cite WAC authority for any PSD rules cited in a permit. In this case, WAC 173-400-720(4) incorporates by reference 40 CFR § 52.21 (r) (1).

Ecology response: Ecology agrees, and will add the reference to WAC 173-400-720(4) to XI.A. and XI.B.

This comment did not result in a significant change to the permit amendment or the TSD, and will not be public noticed for a second public comment period.

Comment: These comments reflect changes that we believe will help to streamline compliance requirements and eliminate any potential conflicts with other regulatory documents.

Ecology response: Ecology agrees and made the appropriate changes.

This comment did not result in a significant change to the permit amendment or the TSD, and will not be public noticed for a second public comment period.

Response to written comments submitted to Ecology by Carol Johnson, Executive Director, of the North Olympic Timber Action Committee by letter attached to e-mail dated June 9, 2016.

Comment: The North Olympic Timber Action Committee would like to express our support of the Port Townsend Paper Corp. project to change the fuel system for their Package Boiler. The replacement of recycled fuel oil with compressed natural gas for the Package Boiler will decrease emissions.

It is important to note that PTPC has spent many millions of dollars to improve the efficiency of the mill operations while providing improvements in air and water quality. The current proposal to convert the Package Boiler to compressed natural gas will further improve their ability to meet the air quality standards even though the new fuel source is still a fossil fuel. It is still an improvement.

NOTAC applauds Port Townsend Paper Company for their innovation and stewardship while providing family wage jobs to a rural area.

Ecology response: Thank you for your comment of support.

This comment did not result in a change to the PSD permit amendment, or the TSD.
Response to written comments submitted to Ecology by Gretchen Brewer, Director of the Port Townsend Air Watchers by e-mail dated June 10, 2016.

Comment: PTPC’s Package Boiler change-out, from burning dirty RFO/reprocessed fuel oil in a 20+ year old boiler to much cleaner CNG/compressed natural gas in an optimized design burner feels like a step in the right direction, albeit small.

Ecology response: Thank you for your comment of support.

This comment did not result in a change to the PSD permit amendment, or the TSD.

Comment: Burner technology has improved a lot in the last 20 years.


This comment did not result in a change to the PSD permit amendment, or the TSD.

Comment: We’re told that this is the last MACT improvement we can expect to see in PTPC’s operating equipment.

That’s a real disappointment because the Package Boiler represents only 3% of PTPC’s reported carbon footprint:

- 16.8k metric tons/year = Package Boiler
- 600k metric tons/year = PTPC total CO$_2$e

(The recovery furnace and Power Boiler 10 are the two largest contributors to the reported CO$_2$e emissions at 335K and 165K mTpy respectively)

(Source eGGRT/EPA’s greenhouse gas reporting tool, 2010)

So the difference will be in the ballpark of around 1% or less of PTPC’s emissions with reductions in other air pollutants, ash, and discharges to the water likely in the same range.

Ecology response: This is the last MACT project because the PTPC mill will be in compliance with the Boiler MACT.

This comment did not result in a change to the PSD permit amendment, or the TSD.

Comment: Converting to a cleaner fuel and a cleaner process is certainly welcome, especially when RFO is what is being replaced! It sounds like this CNG burner might be “the best” within the scope of fossil fuel burners.
Ecology response: The natural gas burner is considered the Best Available Control Technology (BACT) for burning natural gas.

This comment did not result in a change to the PSD permit amendment, or the TSD.

Comment: A real, major improvement that we’d like to see would be to look at the entire facility, and if it’s to continue, to completely re-engineer it to use far less of any fuels at all and where power is needed, to aim for something truly sustainable like wind and solar.

Ecology response: The PSD permit program reviews only the proposed project, and does not review alternative energy options not included in the scope of work for the proposed project. This comment did not result in a change to the PSD permit amendment, or the TSD.

Comment: And to clean up the 100 years’ worth of toxins that have accumulated on and around the site so that taxpayers are not stuck with the bill and locals (including flora, fauna, earth and water) are not stuck with the toxic legacy.

Ecology response: Cleanup of a contaminated site is managed by Ecology’s Toxics Cleanup Program (TCP) through the Model Toxics Control Act (MTCA). The telephone number for Ecology’s Southwest Regional Office’s TCP staff is 360-407-6300. They will be able to provide you with information concerning contaminated sites.

This comment did not result in a change to the PSD permit amendment, or the TSD.

Comment: As I told Kevin Scott, the environmental manager, any improvement is welcome – as long as it’s not offset with detriments elsewhere. That is what I’m asking Ecology to look at here: in past modifications we’ve seen Ecology and the mill take a very narrowly defined view.

Ecology response: The Natural Gas Conversion project in regards to the PSD permit amendment resulted in a decrease in the air pollutant emissions that are part of the PSD program. There was not a “detrimental” increase in PSD air pollutant emissions elsewhere in the facility due to this project.

This comment did not result in a change to the PSD permit amendment, or the TSD.

Comment: CNG has externalized costs. We’ve learned that the gas will arrive in Aberdeen/Satsop via gas lines that increasingly crisscross the country, so it is supporting that environmentally disrupting infrastructure. (From there the CNG will be trucked to Port Townsend in specialized CNG trucks.)

Ecology response: The PSD program regulates only major stationary sources. Mobile sources, and pipelines not involved directly with the PTPC facility in Port Townsend, are not stationary sources and are not included in the PSD program review for the Package Boiler Natural Gas Conversion Project.
This comment did not result in a change to the PSD permit amendment, or the TSD.

**Comment:** The methane is a byproduct of other gas and fossil fuel production (c.f. Wikipedia under “compressed natural gas”), so it still is part of the environmentally degrading practice of fossil fuel usage. When will that be included in Ecology’s permitting calculus? We ask that you start now.

**Ecology response:** The use of fossil fuel is allowed under the PSD program. At this point in time, the United States Environmental Protection Agency (EPA) has not indicated to Ecology any development of changes to the federal PSD rules that would include restriction of fossil fuel usage in the PSD program.

This comment did not result in a change to the PSD permit amendment, or the TSD.

**Comment:** Ultimately rather than piecemeal, we’d like to see a holistic look at the entire mill taken on by PTPC or mandated by Ecology. The mill is fast becoming anachronistic: it is a nearly 100-year old facility, much of it literally crumbling. We are concerned about reports we hear of the conditions that people work in while there, and long-term hits to their health. It runs on a combination of fossil fuels and wood from fast-disappearing forests to make a good product that support the most wasteful aspects of a wasteful consumer society.

**Ecology response:** Ecology’s review regarding the PSD permit amendment did look at what emissions the PTPC Port Townsend facility would increase in regards to the PSD program. Ecology found that all the PSD program pollutant emissions would decrease. The PSD review looked at all the emission units at the PTPC facility that were impacted by the Package Boiler Natural Gas Conversion Project. It was not a piecemeal approach.

In regards to the part of the comment that mentioned workers’ conditions at the PTPC facility, the state of Washington’s Department of Labor and Industries regulates employee worker and health conditions. Their contact telephone number is 1-800-423-7233.

This comment did not result in a change to the PSD permit amendment, or the TSD.

**Comment:** For some information on natural gas and compressed natural gas, see, for instance: [https://en.wikipedia.org/wiki/Compressed_natural_gas](https://en.wikipedia.org/wiki/Compressed_natural_gas) = an overview

**Ecology response:** Thank you for the link to information on natural gas and compressed natural gas.

This comment did not result in a change to the PSD permit amendment, or the TSD.

**Comment:** Union of Concerned Scientists

Environmental Impacts of Natural Gas
Ecology response: Thank you for the link to information on the environmental impacts of natural gas.

This comment did not result in a change to the PSD permit amendment, or the TSD.

Comment: Much as we’d like to support this small step forward (and engaging technology), until the externalized environmental impacts and the holistic picture of the mill and its toxic effect on the community are taken into account, we cannot support the findings of Ecology with respect to this project.

Ecology response: Thank you for your comment. Ecology appreciates your acknowledgement that the Natural Gas Conversion Project is a step forward. Ecology has reviewed the proposed project, and found the Natural Gas Conversion Project complies with the PSD program. This comment did not result in a change to the PSD permit amendment, or the TSD.