



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 21, 2018

Mr. Paul Butkus
Boise White Paper, LLC
Wallula Mill
P.O. Box 500
Wallula, WA 99363

Re: Notice of Construction (NOC) Order No. DE 95AQI084, Modification 4

Dear Mr. Butkus:


Please find enclosed the Notice of Construction (NOC) Order No. DE 95AQI084, Modification 4.

This NOC order went through a 15-day public comment period which ended on January 26, 2018. No public comments were received.

If you have any comments or questions concerning the content of this document, please contact Robert Carruthers at (360) 407-6954 or robert.carruthers@ecy.wa.gov.

If you wish to appeal, you must follow the procedures described in the Order.

Sincerely,


James DeMay, P.E.
Industrial Section Manager
Waste 2 Resources Program

Enclosure

By Certified Mail # [91-7199-9991-7037-1618-8900]



WASHINGTON DEPARTMENT OF ECOLOGY
MAIL STOP 47600
OLYMPIA, WASHINGTON 98504

IN THE MATTER OF AIR EMISSIONS FROM:

Boise White Paper, LLC)	NOC ORDER No. DE 95AQI084
Wallula Mill)	Modification 4
P.O. Box 500)	
Wallula, WA 99363)	

DESCRIPTION

The Washington Department of Ecology (Ecology) is issuing this latest modification to NOC ORDER No. DE 95AQI084 pursuant to its general authority under WAC 173-400-010 and the New Source Review (NSR) regulations in WAC 173-400-111(8).

BACKGROUND

On October 25, 1995, the Boise Wallula Mill submitted a Notice of Construction (NOC) application to the Department of Ecology (Ecology) to construct a cyclone box clipping collection system baghouse to replace the existing cyclone system from the corrugator and six converting machines. On November 25, 1995, Ecology determined the NOC application complete in accordance with Chapter 173-400 WAC and issued the original approval in January 1996. On January 29, 1996, Boise submitted a NOC modification request to increase the hours of operation from 6,000 to 8,736 hours per year. On November 3, 1997, Ecology received a request for a project extension and adjustment to the particulate emissions limit from 0.17 tpy to 0.18 tpy. Ecology granted the extension and the request for an increase in the particulate emission limitation.

On May 28, 2010, Boise submitted a request to change the particulate emission limit from 0.18 tpy to 11.64 tpy. The request was based on the discovery by Boise that the original limit was based on an erroneous calculation provided by the baghouse vendor during the original NOC approval process.

On September 8, 2015, Ecology received a NOC application seeking to replace the existing cyclone and dust collection system with a new cyclone and dust collection system. The new cyclone has a larger air flow capacity than the existing one. A potential increase in particulate emissions is possible due to the increased air flow and this triggered the new source review and NOC application submittal. The project also includes the installation of a new shredder, the installation of new trim evacuation hoods, and the addition of new system lines to connect air streams from these pieces of equipment to the cyclone and dust collection.

Ecology received the NOC modification request for the cyclone box clipping collection system along with the order modification fee on September 8, 2015. Ecology made the NOC application completeness determination on September 22, 2015. The applicant subsequently suspended the project but reinitiated authorization approval for the project again on July 19, 2017. The current project is exactly the same as described in the September 8, 2015 NOC application.

The information submitted with the September 22, 2015 was reexamined and determined to still be complete on July 25, 2017. The review fee submitted with the rescinded 2015 modification request has been applied to the 2017 NOC approval process.

The emissions summary below shows the emission calculation results and historical emissions change related to the installation of, and changes to, the Cyclone Box Clippings Collection System. The 1995 project emissions change was less than the Significant Emission Rate (SER) for TSP and PM10 of 25 and 15 tpy respectively. The current potential emission increase is still below the SER threshold. The original conclusion reached in the October 1995 NOC application review that PSD does not apply to this project is still considered applicable to this project as currently proposed.

Pollutant	Cyclone inlet load rate ^a (gr/ft ³)	Baghouse outlet load rate ^b (gr/ft ³)	Volumetric flow rate (ft ³ /min)	Baseline/actual emissions ^{a,c} (tpy)	PTE ^d (tpy)	Emission increase (tpy)
PM ^e 1995	0.44	0.005	53,000	59.97	9.95	-50.02
PM ^e 2010	0.44	0.005	62,000	9.95	11.64	1.69
PM ^e 2017	0.44	0.005	80,000	11.64	15.02	3.38

Potential to Emit from Current (2010) to Proposed (2017) Dust Collection System

	Outlet load rate (gr/ft ³)	Volumetric flow (ft ³ /min)	tons/hr	tons/day	tons/year
Current	0.005	62,000	0.0013	0.032	11.64
Proposed	0.005	80,000	0.0017	0.041	15.02

- The cyclone inlet loading rate is conservatively assumed as 0.44 gr/ft³ and the cyclone control efficiency is assumed to be 90% per EPA CICA fact sheet for cyclones (7/15/2003). The lowest inlet loading rate and the highest control efficiency listed in the EPA-CICA fact sheet is used such that the lowest possible baseline emissions could be determined. This is a conservative approach to estimate the emission change between the potential to emit and the baseline emissions because the calculation will result in the largest emission change.
- The baghouse outlet loading rate is used for particulates between 1 and 10 microns per guidance from the baghouse manufacturer. Based on input from the baghouse manufacturer, negligible fine particulate matter (PM_{2.5}) will be generated by this process due to the mechanical actions of the emission source.
- Initial baseline emissions were calculated using the following equation: cyclone inlet loading rate (gr/ft³) * (1-0.9) * volumetric flow (ft³/min) * 60(min/hr)/ 7000 (gr/lb) * 8760 (hr/yr)/ 2000 (lbs/ton). Subsequent baseline emissions were assumed to be the potential to emit determined by the previous modifications to the unit.
- Potential to Emit (PTE) is calculated using the following equation: baghouse outlet loading rate (gr/ft³) * volumetric flow (ft³/min) * 60(min/hr)/ 7000 (gr/lb) * 8760 (hr/yr)/ 2000 (lbs/ton).
- Per PSD applicability for the October 25, 1995 NOC application, a volumetric flow rate of 53,000 ft³/min is used to reflect operations during the 1995 time period. A volumetric flow

rate of 62,000 ft³ represented the project as configured in 2010. A volumetric flowrate of 80,000 ft³ represents proposed operations.

FINDINGS

1. Based on the project's estimated impact on emissions, the Industrial Section concurs with the mill's perspective that this project is not subject to PSD review. Thus a PSD Permit is not deemed necessary for the project.
2. The DNS SEPA decision was made on 12/6/2017 by Walla Walla County.
3. The Wallula Mill is a major stationary source that has the potential to emit more than 100 tons per year of several pollutants. The site of the proposed modification is within an area which is in attainment for all pollutants regulated by state and national ambient air quality standards. Wallula Area PM10 redesignation to attainment occurred on August 26, 2005 when the final rule was published in the Federal Register.
4. Best Available Control Technology (BACT) as required under WAC 173-400-110(8)(iv) will continue to be the use of a filter baghouse capable of limiting particulate emissions to 0.005 gr/dscf.
5. The proposed project, if constructed and operated as herein required, will be in accordance with applicable rules and regulations, as set forth in Chapter 173-400 WAC.
6. The current modification will result in an increase of particulate from current operations but there is no indication of a significant adverse impact upon the environment.

THEREFORE, it is ordered that the project, as described in the original NOC and subsequent correspondence, is approved for construction, installation and operation, provided the following conditions below. Order No. DE 95AQI084 Modification 4 will supersede the original Order No. DE AQI084 and subsequent modifications 1, 2, and 3. This Order No. DE 95AQI084 Modification 4 also supersedes that portion of consolidation Order DE 96-AQI078 which references the cyclone box clipping collection system.

CONDITIONS

- 1) Corrugated scrap dust particles shall be captured in filter bags downstream of the replacement cyclone. Annual particulate emissions from the cyclone baghouse system vent shall not exceed 15.02 tpy.
- 2) The cyclone box clipping collection system must be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times. An operation and maintenance (O&M) manual for equipment that has the potential to affect emissions to the atmosphere shall be developed and followed. The manual shall be made available to Ecology upon request.

Excess emissions that result from a failure to follow the requirements of the manuals may be considered proof that the equipment was not properly operated and maintained in accordance with RCW 70.94.152(5). A log of inspections and maintenance of the equipment shall be maintained.

- 3) The pressure drop across the baghouse will be maintained at a maximum of 4 inches during process operation to indicate proper operation of the overall dust collection system. A log of at least weekly readings of the pressure drop across the baghouse will be maintained.
- 4) The permittee will initiate corrective actions within 72 hours when the weekly pressure drop reading exceeds 4 inches. Failure to initiate corrective action within 72 hours may be a violation of the requirement. Report corrective actions and deviations in the monthly report.
- 5) Any activity which is undertaken by the permittee or others acting in the permittee's behalf, in a manner which is inconsistent with the application and this determination, shall be subject to enforcement by Ecology under applicable regulations. Nothing in this determination shall be construed so as to relieve the permittee of its obligations under any state, local, or federal laws or regulations.
- 6) This approval shall become void if construction is not commenced within eighteen (18) months after receipt of this approval, or if construction of the project is discontinued for a period of eighteen (18) months.

YOUR RIGHT TO APPEAL

You have a right to appeal this Order to the Pollution Control Hearing Board (PCHB) within 30 days of the date of receipt of this Order. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal you must do both of the following within 30 days of the date of receipt of this Order:

- File your appeal and a copy of this Order with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this Order on Ecology in paper form - by mail or in person. (See addresses below.) E-mail is not accepted.

You must also comply with other applicable requirements in Chapter 43.21B RCW and Chapter 371-08 WAC.

Your appeal alone will not stay the effectiveness of this Order. Stay requests must be submitted in accordance with RCW 43.21B.320.

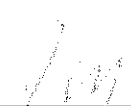
ADDRESS AND LOCATION INFORMATION

Street Addresses	Mailing Addresses
Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503	Department of Ecology Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608
Pollution Control Hearings Board 1111 Israel RD SW STE 301 Tumwater, WA 98501	Pollution Control Hearings Board PO Box 40903 Olympia, WA 98504-0903

MORE INFORMATION


- **Pollution Control Hearings Board**
www.eho.wa.gov/Boards_PCHB.aspx
- **Chapter 43.21B RCW, Environmental Hearings Office – Pollution Control Hearings Board**
<http://apps.leg.wa.gov/RCW/default.aspx?cite=43.21B>
- **Chapter 371-08 WAC – Practice and Procedure**
<http://apps.leg.wa.gov/WAC/default.aspx?cite=371-08>
- **Chapter 34.05 RCW – Administrative Procedure Act**
<http://apps.leg.wa.gov/RCW/default.aspx?cite=34.05>
- **Chapter 70.94 RCW, Washington Clean Air Act**
<http://apps.leg.wa.gov/RCW/default.aspx?cite=70.94>
- **Air Quality Rules**
www.ecy.wa.gov/laws-rules/ecywac.html#air

SIGNATURES


James DeMay, P.E.
Industrial Section Manager
Waste 2 Resources Program

3/31/18
Date

Reviewed by:


Robert Carruthers, P.E.
Environmental Engineer
Waste 2 Resources Program

7/21/18
Date