



MODIFICATION SUPPORT DOCUMENT

Air Operating Permit 0000124

**Nippon Dynawave Packaging Company, LLC
P.O. Box 188
Longview, WA 98632**

Permit Issued Date: October 5, 2017
Permit Effective Date: November 1, 2017
Permit Expiration Date: October 31, 2022
Permit Modification Date: [date]

Prepared by:

Kelsey Holbrook
Washington State Department of Ecology
Solid Waste Management Program, Industrial Section
300 Desmond Drive
P.O. Box 47600
Olympia, Washington 98504-7600
Phone: (360) 407-7563
Fax: (360) 407-6102

Table of Contents

1.0 INTRODUCTION.....	3
2.0 CHANGES TO PERMIT	4
A. 40 CFR Part 63 Subparts S and MM	4
B. Startup, Shutdown, and Malfunction (SSM) Plan Requirements	4
C. Extruders Operations	4
D. Administrative Changes	4
3.0 PUBLIC INVOLVEMENT INFORMATION	5
Appendix A - Response to Comments.....	6

1.0 INTRODUCTION

This document, the modification support document, summarizes the legal and factual basis for the modification of the Air Operating Permit issued by the Washington State Department of Ecology (Ecology) to the source. When Ecology issues a Draft Operating Permit, we must provide a statement that sets forth the legal and factual basis for these draft permit conditions, including references to the applicable statutory or regulatory provisions per Washington Administrative Code (WAC) 173-401-700(8).

Unlike the Air Operating Permit, this document is not legally enforceable. This modification support document summarizes the proposed changes to the Air Operating 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.

2.0 CHANGES TO PERMIT

A. **40 CFR Part 63 Subparts S and MM**

The United States Environmental Protection Agency (EPA) issues National Emission Standards for Hazardous Air Pollutants (NESHAPs) for specific source categories. The NESHAP for Subpart MM, Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills, was reviewed and modified on October 5, 2017 following the Residual Risk and Technology Review (RTR). The Air Operating Permit has been modified to reflect the changes in 40 CFR Part 63 Subpart MM. Certain conditions for the following emission units have been modified to reflect the current regulations in 40 CFR Part 63 Subpart MM: Recovery Furnace No. 10, Smelt Dissolver Tank Vent, and Lime Kiln. These modifications include a new requirement to perform source testing every five years and a requirement to submit excess emissions and continuous monitoring performance testing reports semi-annually, rather than quarterly.

Affected permit conditions are as follows: A.44, A.45, D.2, D.24, E.1, E.11, G.1b, and G.4.

B. **Startup, Shutdown, and Malfunction (SSM) Plan Requirements**

The RTR which was completed for the NESHAP for Subpart MM resulted in the EPA removing the SSM Plan requirements from Subpart MM. The proposed modification to the Air Operating Permit removes the SSM Plan requirements from Section J of the Air Operating Permit.

Affected permit conditions are as follows: E.12 and Section J.

C. **Extruders Operations**

The Extruders Operation, included in Section I of the Air Operating Permit, was previously permitted under Southwest Clean Air Agency's Air Discharge Permit 09-2849. Ecology is concurrently proposing to issue Notice of Construction Order, Number 16181, for the Extruders Operation. Ecology is proposing changes to the VOC limits to more accurately reflect the actual emissions from the units. The proposed Air Operating Permit has been modified to reflect the proposed requirements of Order 16181.

Affected permit conditions are as follows: I.1 through I.34.

D. **Administrative Changes**

Since the issuance of the Air Operating Permit in November 2016 the facility name has changed from Nippon Dynawave Packaging Company to Nippon Dynawave Packaging Company, LLC. This name change has been updated in the proposed Air Operating Permit.

3.0 PUBLIC INVOLVEMENT INFORMATION

Ecology proposes to modify AOP 0000124. We will publish a Public Notice of Modification on **May XX, 2019** in the **XXXXXX** to inform the public that a draft permit modification and supplemental support document are available for review. This notice will be done concurrently with the proposed NOC Order 16181.

Interested persons are invited to submit written comments regarding the draft permit modification. The draft permit modification, support document, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the Ecology office listed below.

Department of Ecology
Industrial Section
300 Desmond Drive
Lacey, WA 98503

Call (360) 407-6916 to make an appointment.

Documents are also available:

- Longview Public Library, 1600 Louisiana Street, Longview, WA 98632
- Online at <https://fortress.wa.gov/ecy/industrial/UIPermit/DraftPermits.aspx>

Submit written comments:

- Using the online comment form at <http://wt.ecology.commentinput.com/?id=kF7UQ>
- By mail or fax to:

Kelsey Holbrook
Department of Ecology
Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600
Fax: (360) 407-6102

Comments should reference specific text followed by the requested change or concern when possible. **Ecology will only consider comments that pertain to the permit conditions we propose to modify, as described above.**

We will consider all comments received within thirty (30) days from the date of public notice of the draft indicated above, in formulating a final determination to modify the permit. Response(s) to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

If you have questions, or need additional information, you may also call Kelsey Holbrook at (360) 407-6355.

Appendix A - Response to Comments

This section will be updated following the public comment period for the draft modification of the permit.