



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 #1 Date: September 30, 2019
Permit Modification #2 Date: April 22, 2020

Prepared by:

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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. Lime Kiln Auxiliary Drive RICE Unit

Nippon Dynawave Packaging Company, LLC (Nippon Dynawave) submitted a request to reclassify the lime kiln auxiliary drive motor from an emergency engine to a non-emergency engine. The unit is subject to 40 CFR 63 Subpart ZZZZ for reciprocating internal combustion engines (RICES). The proposed modification to the Air Operating Permit adds requirements for non-emergency RICE units that are rated less than 100 horsepower (hp). The lime kiln auxiliary drive motor is not subject to the New Source Performance Standards (NSPS) for compression ignition (CI) engines included in 40 CFR 60 Subpart IIII. The lime kiln auxiliary drive motor was ordered and installed in 1984, which pre-dates the applicability date of July 11, 2005.

The proposed modification includes updated information on the engine rating for Nippon Dynawave's other RICE unit (lime mud storage tank). This updated engine rating does not change the requirements for the lime mud storage tank RICE unit. The lime mud storage tank auxiliary drive engine is not subject to the NSPS for spark ignition (SI) engines included in 40 CFR 60 Subpart JJJJ. The lime mud storage tank auxiliary drive was ordered and installed in 1984, which pre-dates the applicability date of June 12, 2006.

Two SI engines were purchased in 1984. One was installed at the lime mud storage tank and was used as an emergency engine until June 18, 2016. The other SI engine that was purchased in 1984 was placed in storage beginning in 1988. The original lime mud storage tank auxiliary drive was replaced in June 2016 with the spare SI engine that was previously purchased in 1984.

Subpart JJJJ states that engines that have been removed from one existing location and reinstalled at a new location are not subject to Subpart JJJJ (40 CFR 60.4236(e)). Existing location is not defined in 40 CFR Part 60; however, existing facility is defined in 40 CFR 60.2 as, "...any apparatus of the type for which a standard is promulgated in this part, and the construction or modification of which was commenced before the date of proposal of that standard..." The replacement engine has not been modified, as defined in 40 CFR 60.14. Additionally, a letter from the United States Environmental Protection Agency (US EPA) to Alyeska Pipeline Service Company dated August 1, 2002 indicates that emission sources which are purchased prior to the applicability date of a respective NSPS, but are not installed until after the applicability date, are not subject to the respective NSPS unless the emission source has been modified or reconstructed. Based on the definition of existing facility and the letter from US EPA, the replaced lime mud storage tank auxiliary drive engine is not subject to the requirements in 40 CFR 60 Subpart JJJJ.

Affected permit conditions are as follows: K.1, K.3, and K.4. Condition K.6 was deleted because it does not apply to the RICE units at Nippon Dynawave.

B. Pulp Dryer

Nippon Dynawave was issued Notice of Construction Order Number 16197 for the pulp dryer project on May 16, 2019. The proposed modification to the Air Operating Permit incorporates the conditions of Order 16197.

A new section was added to the proposed Air Operating Permit for the pulp dryer (Section L).

C. Administrative Changes

The addition of a new section for the pulp dryer required updated section and condition numbers for those sections following the pulp dryer section. The Greenhouse Gas (GHG) Reporting section was updated to Section M and all conditions were renumbered to reflect the new section heading. The Compliance Assurance Monitoring (CAM) section was updated to Section N and all conditions were renumbered to reflect the new section heading.

The introduction and legal authority section was updated to reflect the current permitting structure. Nippon Dynawave is now considered a single major Title V source. When the Air Operating Permit was issued in 2017 there were three sources which were aggregated as a single major Title V source. The three sources have been disaggregated and are now three separate major Title V sources.

3.0 PUBLIC INVOLVEMENT INFORMATION

Ecology proposes to modify AOP 0000124. We will publish a Public Notice of Modification on January 10, 2020 on Ecology’s air register mill to inform the public that a draft permit modification and supplemental support document are available for review.

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://ecology.wa.gov/Regulations-Permits/Permits-certifications/Industrial-facilities-permits/Nippon-Dynawave-Longview>

Submit written comments:

- Using the online comment form at <http://ac.ecology.commentinput.com/?id=CtPgE>
- By mail to:

Kelsey Holbrook
Department of Ecology
Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600

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

No comments were received during the public comment period.