

**Washington State Department of Ecology**  
**Response to Comments**  
**Notice of Construction Order 3462, Modification 1**  
**WestRock Longview LLC**  
**Public comment period: May 22 – June 24, 2020**

This document addresses questions and comments received by the Department of Ecology (Ecology) during the public comment period for the draft modification to Notice of Construction (NOC) Order 3462 (Order). We published notice of an opportunity to comment on the Ecology website. In the notice, we invited public review of the documents and provided a 34-day public comment period. We received one set of comments from WestRock Longview during the comment period. Ecology carefully reviewed all the comments received. During the review, Ecology considered whether the comments provided any new facts relevant to the project or identified any areas where the proposed Order modification had neglected or misapplied an applicable requirement found in rule or law. We have included all of the comments received in this document. Some comments were received in the form of redlines to a Microsoft word document copy of the draft Order. Ecology has attempted to also capture those comments. Changes were made to the Order, where necessary. The changes are described in the response to the appropriate comment. A copy of the final NOC Order will be sent to all interested parties upon issuance and posted on the Industrial Section website at <https://fortress.wa.gov/ecy/industrial/UIPermit/NOCPermits.aspx>.

## WESTROCK LONGVIEW COMMENTS

### 1. Findings Item 8 (Page 2 of 21)

This finding states that Kamyrr Washers No.1 and No. 2 as subject to the requirements of 40 CFR Part 60, Subpart BB. These washers at the Longview mill Kamyrr digesters are diffusion washers as discussed in the SOB of the draft AOP. Per §60.280(a), brown stock washer systems are the only stock washing systems subject to the provision of this subpart. Diffusion washers are excluded from the brown stock washer system definition in §60.281.

Redline:

*“Recovery Furnace No. 22, Smelt Dissolving Tank No. 22, Lime Kiln No. 5, Evaporator No. 10, Kamyrr Digester ~~and Washer~~ No. 1, and Kamyrr Digester ~~and Washer~~ No. 2 shall comply with all the requirements of the new source performance standards for kraft pulp mills in 40 CFR Part 60 Subpart BB. Power Boiler No. 20 shall comply with all the requirements of the new source performance standards for fossil-fuel-fired steam generators in 40 CFR Part 60 Subpart D.”*

Text in **bold** were proposed changes to the draft language that were provided by WestRock Longview in their redline version of the Order.

#### Ecology Response

Ecology has incorporated the proposed changes.

### 2. Condition 5 (Page 3 of 21)

Edits to match the actual text in WAC 173-405-040(4)(a) where this requirement comes from.

Redline:

*“~~All~~ **non**-condensable gases (NCGs) from the digesters, **multi-effect** evaporators, and the condensate stripper system shall be ~~continuously~~ treated to reduce the emissions of TRS equal to the reduction achieved by thermal oxidation in a lime kiln.”*

Text in **bold** were proposed additions to the draft language that were provided by WestRock Longview in their redline version of the Order.

#### Ecology Response

Ecology has incorporated the proposed changes.

### 3. Condition 7 (Page 4 of 21)

WestRock suggest removing this generic open-ended statement to avoid confusion and misinterpretation. The content included in the air monthly report for Appendix A limits has been well established by many years.

Redline:

*“Data required to demonstrate compliance with emission limits in Appendix A shall be reported in written form to the Washington Department of Ecology Industrial Section or its authorized representative at least monthly (unless a different testing and reporting schedule has been approved by Ecology).”*

The report shall be submitted in conformance with the time requirements included in WAC 173-405, but in no case later than thirty days after the end of the calendar month being reported. The report shall be in a format approved by Ecology. Report contents shall include but not be limited to the following:

- a. The average daily production of machine dried unbleached pulp.
- ~~b. Process or control equipment operating parameters.”~~

Text in **bold** were proposed changes to the draft language that were provided by WestRock Longview in their redline version of the Order.

**Ecology Response**

Ecology has updated the language in the Order to provide more clarity.

**4. Former Condition 8 (Page 4 of 21)**

This condition should be removed as the Bleach Plant has been permanently retired from service.

Redline:

~~“As of March 1994, WestRock Longview shall no longer use elemental chlorine as a bleaching agent in Bleach Plant Nos. 1 and 2.”~~

Text in **bold** were proposed changes to the draft language that were provided by WestRock Longview in their redline version of the Order.

**Ecology Response**

Ecology has updated the language in the Order.

**5. Appendix B (Page 17 of 21)**

This is the most updated ECCDP requirement for LK4.

Redline:

Unit	Fuel	Loading Rate (TCaO/D)	Pressure Drop (inches H2O)	Hi Pressure Flow (gpm)	Hi Pressure H2O Pressure (psig)
Lime Kiln 4	Gas	≤250	≥10	≥375	≥500
Lime Kiln 4	Oil	≤ <b>170*</b>	≥20	≥375	≥500

**\*[TCaO/D + % oil substitution (heat input basis)] ≤215, and oil substitution ≤50% (heat input basis).**

Text in **bold** were proposed changes to the draft language that were provided by WestRock Longview in their redline version of the Order.

**Ecology Response**

WestRock Longview performed source testing and updated operating limits in the ECCDP. An updated ECCDP was been included in Appendix B.

**6. Condition C3.1 (Page 12 of 21)**

WestRock Longview provided a comment on the AOP (which was simultaneously out for public comment) regarding Condition C3.1 of Order 3462-AQ07. Based on that comment, a typographical error in C3.1 which required the semi-annual reporting of opacity which exceeded 30 percent has been updated to 20 percent.