

Washington State Department of Ecology
Response to Comments
Notice of Construction Order 8429, 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 8429 (Order). We published notice of an opportunity to 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. Condition 5.6 (Page 13 of 19)

As stated in the February 20, 2015 letter to Ecology, the 20PB firing rate can vary on a number of factors including boiler stability, steam header pressure, and demand from the mill steam users (e.g., paper machines) so testing rate should be based on representative conditions and sustained boiler operation.

Redline:

*“Subsequent source tests shall be conducted when the unit is operating at $\geq 95\%$ of the maximum **daily** hourly **average** rate the unit operated at since the prior source test.”*

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 included the proposed additions. Ecology agrees with the statement provided by WestRock Longview. In addition, the averaging period for the associated NH₃ emission limit is 24 hours. It is logical that the operating rate be established in a way that reflects the averaging period of the standard. Similar language has been updated on page 15 of 19 of the Order regarding RM202 for particulate matter.

2. Condition 15 (Page 15 of 19)

This added language is for clarification that the condition only applies to testing according to the requirements of this Order.

Redline:

*“When RM 5 testing occurs **to satisfy the requirements in Condition 5** and no RM 202 testing is required by the Order, the average ratio of filterable PM to condensable PM from the 3 previous RM 202 source tests shall be used to calculate the condensable PM during the RM 5 source test.”*

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 included the proposed additions.

3. Condition 15 (Page 15 of 19)

30 days to contract, schedule, make notifications and perform a stack test is not a realistic or practical requirement. It takes at least a few weeks to source and schedule a stack test. Also, Ecology has imposed a condition of a 30-day notification for any stack test so the agency can observe the test if needed. 60 days is the most typical timeframe for this type of requirement to accommodate agency notification requirements, contracting steps and stack testing firm schedule restrictions.

Redline:

*“When RM 202 testing is not required by the Order and the calculated PM-total, PM2.5- total, or PM10-total results indicate a potential exceedance of the applicable emission limit(s), the Permittee must perform a RM 5/RM 202 source test within **60** ~~30~~ days of discovery of the **calculated** excursion.*

30 days to contract, schedule, make notifications and perform a stack test is not a realistic or practical requirement. It takes at least a few weeks to source and schedule a stack test. Also, Ecology has imposed a condition of a 30-day notification for any stack test so the agency can observe the test if needed. 60 days is the most typical timeframe for this type of requirement to accommodate agency notification requirements, contracting steps and stack testing firm schedule restrictions.”

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 included the proposed changes in the Order.

4. Condition 15 (Page 15 of 19)

The added language is to add flexibility and to account for the fact that stack test results are not immediately known, normally it is several weeks after the actual test when results are received by the facility. The most likely initial step would be the review of calculations and test results with the stack testing contractor, which is affected by the contractor’s schedule. The added language also clarifies that investigation results should dictate whether corrective actions are needed. As noted in the language of this condition, a calculated excursion is not considered a violation and there is already a requirement for a stack test within 60 days of discovery.

Redline:

*“The Permittee must **start an investigation** the cause of any calculated excursion **within 3 business days of discovery** and take **immediate corrective actions if necessary as determined by the investigation. Findings and c**Corrective actions **if taken** as a result of calculated excursions must be reported to Ecology **in the following monthly air report.**”*

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 reflect concerns of WestRock Longview.