



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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www.deq.idaho.gov

Governor Brad Little
Director John H. Tippetts

September 10, 2019

Clayton Steele, Environmental Manager
Clearwater Paper Corp.-Pulp and Paperboard Div., Idaho
803 Mill Road
Lewiston, Idaho 83501

RE: Facility ID No. 069-00001, Clearwater Paper Corp.-Pulp and Paperboard Div., Idaho, Lewiston
Final Permit Letter

Dear Mr. Steele:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2019.0019 for Clearwater Paper Corp.-Pulp and Paperboard Div., Idaho, located at Lewiston, to change the Lurgi scrubber days of operation requirement, process in accordance with 209.05.c. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received April 1, 2019.

This permit is effective immediately and replaces PTC No. P-069-00001, issued on September 22, 1999. This permit does not release Clearwater Paper Corp.-Pulp and Paperboard Div., Idaho from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

This PTC was processed in accordance with IDAPA 58.01.01.209.05.c. In accordance with IDAPA 58.01.01.381.03.b, so long as the change does not violate any terms or conditions of the existing Tier I permit, you may operate the source described in the PTC immediately upon submittal of your request for a Tier I administrative amendment.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a permit handoff meeting with Melissa Beale, Title V Analyst, at (208) 799-4370 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Tom Burnham at (208) 373-0502 or tom.burnham@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\tb
Permit No P-2019.0019 PROJ 62212
Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee Clearwater Paper Corp.-Pulp and Paperboard Div., Idaho
Permit Number P-2019.0019
Project ID 62212
Facility ID 069-00001
Facility Location 803 Mill Road
Lewiston, ID 83501

Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules), IDAPA 58.01.01.200-228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200-228.

Date Issued September 10, 2019


Tom Burnham, P.E., Permit Writer


Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

- 1.1 This is a revised permit to construct (PTC) to remove the Lurgi scrubber days of operation requirement.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces Permit to Construct No. P-069-00001, issued on September 22, 1999.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	<u>Emissions Unit Name: Chlorine Dioxide Plants 134 and 234</u> Manufacturer: Lurgi Model: 42-cell electrolysis Manufacture Date: 1990	<u>Control Device Name: Lurgi scrubber</u> Manufacturer: Lurgi Manufacture Date: 1990 Type: Wet scrubber Or, <u>Control Device Name: Fiberline Bleach Plant scrubber</u> Manufacturer: Fiberline Manufacture Date: 1995 (cross-tie) Type: Wet scrubber

2 Chlorine Dioxide Lurgi Plant

2.1 Process Description

The generation of chlorine dioxide is accomplished with the Lurgi plant by generating a chemical reaction between a sodium chlorate solution (Na_2ClO_3) and a hydrochloric acid solution (HCl) to form gaseous chlorine dioxide (ClO_2). The ClO_2 is absorbed into chilled water to form the chlorine dioxide solution that is used in the pulp bleaching process. Chlorine gas generated as a byproduct of the reaction is burned with hydrogen from the electrolysis of sodium chlorate to make the HCl.

There are two separate chlorine dioxide plants (134 and 234) within the Lurgi plant. Each of these plants contains a HCl Synthesis unit, ClO_2 generation unit, and chlorate electrolysis unit. The two plants have a combined final chlorine scrubber (Lurgi chlorine scrubber). During maintenance work on the Lurgi chlorine scrubber, the Lurgi scrubber is bypassed and the chip Fiberline Bleach Plant scrubber is utilized as the Auxiliary scrubber.

2.2 Control Device Descriptions

Table 2.1 Chlorine Dioxide Lurgi Plant Description

Emissions Units / Processes	Control Devices	Emission Points
134 HCl synthesis	Lurgi scrubber or Fiberline Bleach Plant scrubber	Lurgi scrubber exhaust or
234 HCl synthesis		Fiberline Bleach Plant scrubber exhaust

Emission Limits

2.3 Emission Limits

The emissions from the HCl synthesis and Lurgi scrubber exhaust stacks shall not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 2.2 Chlorine Dioxide Lurgi Plant Emission Limits ^(a)

Source Description	Chlorine		Chlorine Dioxide		HCl	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
134 HCl synthesis	0.16	0.7	0.16	0.7	0.53	2.3
234 HCl synthesis	0.16	0.7	0.16	0.7	0.53	2.3
Lurgi Cl_2 scrubber	0.26	1.1	0.26	1.1	0.15	0.7

a As determined by pollutant-specific EPA reference method, DEQ-approved alternative, or as determined by the DEQ's emission estimation methods used in the permit application analysis.

2.4 Opacity Limit

Emissions from the HCl synthesis and Lurgi scrubber exhaust stack, or any other stack, vent, or functionally equivalent opening associated with the HCl synthesis and Lurgi scrubber exhaust, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[9/10/2019]

Operating Requirements

2.5 Lurgi Chlorine Dioxide Plant Scrubber Requirement

Whenever the Lurgi chlorine dioxide plant is operating, either the Lurgi chlorine scrubber or the Auxiliary chlorine scrubber must be operating in accordance with the O&M manual.

[9/10/2019]

2.6 Fiberline Bleach Plant Scrubber Operation

The Fiberline Bleach Plant scrubber shall operate continuously while the Lurgi scrubber is undergoing maintenance or in emergency situations when needed.

[9/10/2019]

2.7 Scrubbing Media Flowrate of the Fiberline Bleach Plant Scrubber

The make-up scrubbing media flowrate to the Fiberline Bleach Plant scrubber shall be a minimum of fifty gallons per minute (50 gpm) at any time that both the Fiberline Bleach Plant is operating and the scrubber is being used as a scrubber for the Lurgi Plant.

[9/10/2019]

2.8 Planned Shut-Down

The Permittee shall not conduct a planned shut-down of either Synthesis unit while the Fiberline Bleach Plant scrubber system is being used as a scrubber for the Lurgi Plant.

[9/10/2019]

Monitoring and Recordkeeping Requirements

2.9 Control Monitoring

The Permittee shall monitor and record the following information on a daily basis. All data shall be kept on-site, in a log, for a period of two (2) years and be made available to Department representatives upon request.

2.9.1 Which scrubber is operating (Lurgi scrubber or Fiberline Bleach Plant scrubber); and

2.9.2 The Fiberline Bleach Plant scrubber media flowrate while the Fiberline Bleach Plant scrubber is operating in place of the Lurgi scrubber.

[9/10/2019]

Performance Testing Requirements

2.10 Performance Test

Any performance tests conducted to demonstrate compliance shall be performed in accordance with IDAPA58.01.01.157 and General Provisions of this permit.

[9/10/2019]

3 General Provisions

General Compliance

3.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the "Rules for the Control of Air Pollution in Idaho." The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the "Rules for the Control of Air Pollution in Idaho," and the Environmental Protection and Health Act (Idaho Code §39-101, et seq).

[Idaho Code §39-101, et seq.]

3.2 The permittee shall at all times (except as provided in the "Rules for the Control of Air Pollution in Idaho") maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]

3.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

3.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee's premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

3.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

3.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
- A notification of the date of any suspension of construction, if such suspension lasts for one year or more; and

- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.01, 5/1/94]

- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

3.7 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

3.8 All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

3.9 Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00 and 4/11/15]

Monitoring and Recordkeeping

3.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

- 3.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

- 3.12 All documents submitted to DEQ—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification—shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

- 3.13 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

- 3.14 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

- 3.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

- 3.16 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/94]