M/S 532

DEC 3 1984

Jerald Cran
Potlatch Corporation
P.O. Box 1016
Lewiston, Idaho 83501

Dear Mr. Cran:

We have evaluated your application for a Prevention of Significant Deterioration (PSD) permit to construct the No. 5 recovery boiler at the Lewiston, Idaho mill and have determined that the project will meet the requirements of the PSD permit regulations and the Clean Air Act. Accordingly, on the basis of the complete PSD permit application, EPA hereby grants its approval to the Potlatch Corporation to construct the recovery boiler to the terms and conditions contained in the enclosed permit. Also enclosed is EPA's Final Determination Analysis Document for this project.

Because no comments were received on the draft permit and no substantive changes have been made in the final permit, the permit is effective immediately.

Sincerely,

Gary L. O'Neal, Director
Air and Toxics Division

Enclosure
FINAL DETERMINATION ANALYSIS DOCUMENT
PREVENTION OF SIGNIFICANT DETERIORATION

APPROVAL OF CONSTRUCTION OF THE
No.5 RECOVERY BOILER AT
LEWISTON, IDAHO

Scope

This document presents the final determination by the Environmental Protection Agency (EPA) to approve Potlatch Corporation's proposed construction of the No.5 recovery boiler at the Lewiston, Idaho mill under the Federal requirements of Part C, Title I, of the Clean Air Act; "Prevention of Significant Deterioration of Air Quality (PSD)."

Background

On July 5, 1984, EPA Region 10 received from the Potlatch Corporation a complete PSD permit application requesting approval to construct a new recovery boiler at the Lewiston, Idaho mill. EPA reviewed this application and presented its findings in a preliminary determination document which was released for public comment and published in the "Lewiston Morning Tribune" on November 1, 1984. Affected governmental agencies and the general public were notified of their opportunity to submit written comments and request a public hearing regarding EPA's preliminary determination.

Public Comment

No comments and no requests for public hearings were received.

Findings

Based upon our review of the application, EPA finds that the National Ambient Air Quality Standards and PSD increments will not be exceeded as a result of this project and that the proposed facility will employ Best Available Control Technology (BACT). In light of these findings, EPA grants approval to the Potlatch Corporation to construct the subject recovery boiler. This approval is subject to the terms and conditions set forth in the letter of approval to the Potlatch Corporation.
Application of:  
Potlatch Corporation  
P.O. Box 1016  
Lewiston, Idaho  

Pursuant to the Agency regulations for the Prevention of Significant Deterioration of Air Quality (PSD) set forth at Title 40, Code of the Federal Regulations, Part 52 and based upon the complete application submitted on July 5, 1984 by the Potlatch Corporation the Environmental Protection Agency now finds as follows:

FINDINGS

1. The Potlatch Corporation proposes to construct the No 5. recovery boiler at Lewiston, Idaho mill. The modernization project involves several portions of the mill, including the wood yard, the digesting operation, the screening operation, and the chemical recovery area.

2. An analysis of projected emissions indicates that this project has the potential to emit more than the EPA significant levels for nitrogen oxides ($NO_x$), carbon monoxide (CO), and sulfur dioxide ($SO_2$) and is therefore subject to PSD review for these pollutants.

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3. The proposed construction is located in an area designated as "Class II" under Section 162(b) of the Clean Air Act.

4. Modeling analysis of NO$_x$, CO, and SO$_2$ has been conducted and demonstrates that while emissions of these pollutants will increase, the modifications will not cause any violations of the applicable National Ambient Air Quality Standards or PSD increments so long as the proposed sources are operated in accordance with the conditions specified below. With the application of best available control technology, as required by Section 165(a)(4), operation of these sources will meet the applicable PSD requirements.

   Accordingly, it is hereby determined that, subject to the conditions set forth below, the Potlatch Corporation will be permitted to operate the subject source at Lewiston, Idaho mill.

   APPROVAL CONDITIONS

1. Emissions of nitrogen oxides (NO$_x$), carbon monoxide (CO), and sulfur dioxide (SO$_2$) shall not exceed the following:

   EMISSION LIMITATIONS

<table>
<thead>
<tr>
<th>Facility</th>
<th>Pollutant (l)</th>
<th>Pounds Per Hour</th>
<th>Tons Per Year</th>
<th>Parts Per Million (2)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>SO$_2$</td>
<td>450</td>
<td>1960</td>
<td>200</td>
</tr>
<tr>
<td>No. 5</td>
<td>CO</td>
<td>880</td>
<td>3850</td>
<td>900</td>
</tr>
<tr>
<td>Recovery</td>
<td>NO$_x$</td>
<td>320</td>
<td>1400</td>
<td>200</td>
</tr>
</tbody>
</table>

   1. SO$_2$ and NO$_x$ will be reevaluated based on actual operating experience.

   2. The concentration limitations are on a dry bases at 8% oxygen. The SO$_2$ and CO concentration and hourly mass emission limitations represent the average over each 24-hour day. The NO$_x$ value represents the average value determined by EPA Method 7.
2. With the exception of NO\textsubscript{x}, CO, and SO\textsubscript{2} increases in potential 
emissions of any pollutant regulated under the Clean Air Act resulting from 
this construction will be less than the significant levels [Section 
52.21(b)(23)(i)].

3. The Potlatch Corporation shall notify the Idaho Department of Health and 
Welfare (IDHW) of any occurrence of any emissions in excess of limits 
specified in Condition Numbers 1 and 2 above; such notification shall be 
forwarded to IDHW in writing in a timely fashion and in each instance no 
later than ten (10) days from the date of such occurrence. The notification 
shall include an estimate of the resultant emissions and a narrative report 
of the cause, duration and steps taken to correct the problem and avoid a 
recurrence. The Potlatch Corporation shall contemporaneously send a copy of 
all such reports to EPA.

4. This approval shall become void if on-site construction is not commenced 
within eighteen (18) months after receipt of the approval or if on-site 
construction once initially commenced is discontinued for a period of 
eighteen (18) months.

5. As approved and conditioned by this permit, any construction, 
modification or operation of the proposed sources shall be in accordance 
with the application which resulted in this permit. Moreover, any such 
activity which is undertaken by the Potlatch Corporation, or others, in a 
manner which is inconsistent with this permit shall be subject to EPA 
enforcement under the Clean Air Act. Nothing in this permit shall be 
construed to relieve the Potlatch Corporation of its obligations under any 
state or federal laws including Sections 303 and 114 of the Clean Air Act.

6. The SO\textsubscript{2} emission limitations shall be reevaluated based on actual 
operating experience one year after startup of the No. 5 recovery boiler and
again one year after the No. 5 recovery boiler achieves operation at full capacity (4,000,000 lb/day or greater of black liquor solids). The NO\textsubscript{X} emission limitation shall be reevaluated one year after the No. 5 recovery boiler achieves operation at full capacity.

7. Compliance with emission limitations shall be demonstrated by source tests and a program of emission monitoring as described below:

a. Compliance Testing - Compliance testing shall be conducted within 60 days after achieving the normal production rate at which the No. 5 recovery boiler will be operated, but not later than 180 days after startup of the boiler. EPA method 6 shall be used for SO\textsubscript{2} and EPA Method 10 for CO. EPA method 7 or Method 20 shall be used for NO\textsubscript{X}. The Company shall submit a test plan to EPA and IDHW for approval prior to testing.

b. Compliance Monitoring: A continuous monitoring system shall be installed to monitor CO and SO\textsubscript{2}. These monitors shall comply with the specification requirements in Appendix B of 40 CFR Part 60.

8. EPA and IDHW shall be notified in writing of the commencement of construction and the startup date within thirty (30) days of the date of their occurrence.

Access to the source by EPA or State regulatory personnel will be permitted upon request for the purpose of compliance assurance inspection. Failure to allow such access is grounds for revocation of this permit.

Date

[Signature]
Gary L. O'Neal, Director
Air and Toxics Division

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