

Statement of Basis

Tier I Operating Permit No. T1-2014.0023

Project ID 61848

Clearwater Paper Corp. – PPD & CPD

Lewiston, Idaho

Facility ID 069-00001

Final

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Permit Writer

The purpose of this Statement of Basis is to set forth the legal and factual basis for the Tier I operating permit terms and conditions, including references to the applicable statutory or regulatory provisions for the terms and conditions, as required by IDAPA 58.01.01.362

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1. INTRODUCTION AND APPLICABILITY

This document provides the basis for a Tier I operating permit administrative amendment to incorporate the provisions of a permit to construct into a Tier I operating permit in accordance with IDAPA 58.01.01.209.05.c.

2. FACILITY INFORMATION

2.1 Facility Description

The mill produces bleached kraft pulp from sawdust and wood chips. The mill consists of digesters, pulp preparation activities (washers and bleaching), and chemical recovery processes (e.g. recovery furnaces and lime kilns). The pulp is processed in three different areas. Uncoated and coated paperboard is produced in the paper machine area; market pulp is dried on the pulp dryer in the finishing area; and slurried pulp stock is pumped to the Clearwater Paper Corporation, Consumer Product Division.

2.2 Facility Permitting History

Underlying Permit History - Includes every underlying permit issued to this facility

The following information is the comprehensive permitting history of all underlying applicable permits issued to this Tier I facility. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A), superseded (S) and expired (E).

Date	Permit Number	Project	Status
December 6, 1973	069-00001	#1 Recovery, #4 Kiln, Digester, Stock Washer	A
September 20, 1978	N/A - letter	#4 Power Boiler	A
July 5, 1979	13-1140-0003-00 (9 pg)	SIP Air Pollution Source Permit	A
July 5, 1979	13-1140-00001-001 (19 pg)	SIP Air Pollution Source Permit	A
September 30, 1980	PSD X80-18	EPA PTC - #4 Power Boiler	A
May 6, 1983	1140-0001	#5 Recovery Boiler	A
July 26, 1983	13-1140-0001-00 (19 pg)	Amendment to 1979 SIP Air Pollution Source Permit	E
August 22, 1984	1140-0001	Air Pollution Source Permit	E
December 3, 1984	PSD -X84-01	#5 Recovery Furnace	A
July 3, 1985	1140-0001-315	Trash Hog	S
August 19, 1985	1140-00001	Air Pollution Source Permit Mod - Trash Hog	E
September 15, 1986	1140-0001	Air Pollution Source Permit Mod - Kilns	S
October 29, 1986	1140-0001	Air Pollution Source Permit Mod - Kilns	S
September 9, 1988	1140-0001	Lime Slaking and Handling	S
May 25, 1989	PSD-X84-01	EPA PTC amend - #5 Recovery	S
July 3, 1990	1140-0001	Chlorine Dioxide	S

August 14, 1990	1140-0001	Oxygen Delignification	S
December 11, 1990	1140-0001	PTC Mod - Oxygen Delignification	S
April 30, 1993	069-00001	NCG Incinerator	S
June 22, 1994	069-00001	Chlorine Dioxide	S
September 6, 1994	069-00001	PTC Mod - Oxygen Delignification	S
September 6, 1994	069-00001	PTC amend - Chlorine Dioxide	S
October 17, 1994	PSD-X84-01	EPA PTC amend - #5 Recovery	A
March 2, 1995	069-00001	PSD permit mod	S
March 16, 1995	069-00001	PSD permit mod - letter	A
March 15, 1995	069-00001	NCG Incinerator	S
May 8, 1995	069-00001	#4 & #5 Saltcake	S
August 7, 1995	069-00001	#4 & #5 Saltcake	S
December 18, 1995	069-00001	Chlorine Dioxide	S
January 31, 1996	069-00001	PTC amend - Chlorine Dioxide	S
September 16, 1996	069-00001	Oxygen Delignification	S
January 29, 1997	069-00001	#4 & #5 Saltcake	C
March 21, 1997	069-00001	PTC amend - NCG Incinerator	S
April 30, 1997	069-00001	PTC amend - NCG	S
August 29, 1997	069-00001	NCG Incinerator	S
September 3, 1998	069-00001	Temporary Boilers	S
November 6, 1998	069-00001	Temporary Boilers	A
April 28, 1999	069-00001	Chlorine Dioxide Plant	S
September 22, 1999	069-00001	Chlorine Dioxide Plant	A
February 14, 2000	069-00001	PTC amend - Chlorine Dioxide	A
August 31, 2001	069-00001	Thermocompressor	A
February 26, 2002	069-00001	#3 & #4 Lime Kilns	S
May 31, 2002	069-00001	#3 & #4 Lime Kilns	S
June 24, 2002	069-00001	#3 & #4 Lime Kilns	S
December 17, 2002	069-00001	Initial Tier I permit	S
February 27, 2003	069-00001	Lime Kilns, incorporates PTC issued 6/24/02	S
November 9, 2006	P-050208	Package Boilers	S
February 21, 2007	T1-050216	Administrative Amendment	S
May 25, 2007	P-060209	PTC amend - NCG Incinerator	S
August 17, 2007	P-2007.0056	Oxygen Delignification	A
August 27, 2007	T1-2007.0057	Tier I	S
April 24, 2008	P-2008.0009	PTC amend - Package Boilers	A
April 13, 2009	P-2009.0020	PTC amend - Lime Handling	A
January 1, 2010	T1-2007.0106	Tier I newal	S
February 2, 2012	P-2011.0101	Changes to lime kiln permits	A
October 4, 2012	P-2012.0046	Changes to reflect rule changes	A
April 1, 2010	T1-2010.0030	Add CEM requirements	S

February 22, 2012	T1-2010.0030	Admin. Amendment to add kiln PTC	S
July 20, 2012	T1-2010.0030	Admin Amendment to reflect rule change	E
September 3, 2015	P-2015.0007	Pulp Optimization Project	S
February 1, 2017	P-2015.0007	Pulp Optimization – Changes to Polysulfide generator controls	A

3. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

3.1 Application Scope

Clearwater Paper Corporation submitted an application to revise the existing permit to construct for the Pulp Optimization Project to change the type of air pollution control equipment that is used on the polysulfide generator. Clearwater changed from using a scrubber to control emissions to a condenser.

Clearwater requested in accordance with IDAPA 58.01.01.209.05.c that the permit to construct be incorporated into the Tier I operating permit as an administrative amendment. According to this Rule the permit to construct is subject to the same procedural requirements as if were a Tier I operating permit (a public comment period, affected states review and EPA review are included). Once the permit to construct is issued the source may request at any time to have the permit to construct incorporated into the Tier I permit as an administrative amendment.

This permitting action is solely to administratively amend the existing Tier I operating permit to include the provisions of PTC No. P-2015.0007, project 61735, issued February 1, 2017 for the Pulp Optimization Project. Those permit changes are included in Section 23 of the permit as exact quotes; all other permit conditions remain unchanged.

This Tier I operating permit replaces Tier I Operating Permit No. T1-2014.0023, issued February 19, 2016.

3.2 Application Chronology for Underlying PTC

June 24, 2016	DEQ received an application, including a request to administratively amend the Tier I operating permit to include the provisions of the PTC
July 25, 2016	DEQ determined that the application was incomplete.
August 18, 2016	DEQ received supplemental information from the applicant.
October 4, 2016	DEQ determined that the application was complete.
November 29, 2016	DEQ made available the draft permit and statement of basis for peer and regional office review.
December 2, 2016	DEQ made available the draft permit and statement of basis for applicant review.
12/19/16-1/18/17	DEQ provided a public comment period on the proposed action.
January 20, 2017	DEQ provided the proposed permit and statement of basis for EPA review.

4. Emissions Estimates, Regulatory Review and Permit Conditions Review

The emission inventory, regulatory review and permit conditions review can be seen in the February 1, 2017 statement of basis which supports the issuance of underlying Permit to Construct No. P-2015.0007,

issued February 1, 2017 (Project 61735). They are not repeated in this statement of basis.

5. PUBLIC COMMENT

As required by IDAPA 58.01.01.209.05.c, a public comment period was made available to the public from December 19, 2016 to January 18, 2017. During this time comments were not submitted in response to DEQ's proposed action.

In addition to the public comment period DEQ also provided an opportunity for a public hearing for persons interested to appear and submit written or oral comments. DEQ did not receive a request for a public hearing and one was not held.

6. EPA REVIEW OF PROPOSED PERMIT

As required by IDAPA 58.01.01. 209.05.c, DEQ provided the proposed permit to EPA Region 10 for its review and comment on January 20, 2017 via e-mail. On January 27, 2017, EPA Region 10 responded to DEQ via e-mail indicating the permit is eligible to be issued.