

WASHINGTON DEPARTMENT OF ECOLOGY
MAIL STOP 47600
OLYMPIA, WASHINGTON 98504

IN THE MATTER OF AN ADMINISTRATIVE
ORDER TO BOISE WHITE PAPER, L.L.C.

ORDER NO. 15757

To: Boise White Paper, L.L.C.
Wallula Mill
31831 W. Highway 12
Wallula, WA 99363

DESCRIPTION

This State Administrative Order (Order) is issued pursuant to the authority of RCW 70.94.141(3) and WAC 173-400-091.

This order establishes voluntary VOC emission limitations for the No. 3 Paper Machine (hereinafter “W-3 Paper Machine”). Based on the emissions information provided by Boise White Paper, compliance with this Order will ensure that the continued operation of pulping, paper-making and recovery operations at the Boise White Paper Wallula Mill following the shutdown of all bleaching operations at the facility will not trigger additional new source review permitting requirements as a result of this project. The mill shall operate in compliance with the limits established herein.

BACKGROUND

Packaging Corporation of America (PCA) owns and operates the Boise White Paper, L.L.C. Mill in Wallula, WA (the “Wallula Mill”) which currently manufactures bleached and unbleached paper and packaging products. The Wallula Mill plans to discontinue production of all bleached paper products (i.e., uncoated freesheet and coated on-side grades) at the mill on or about May 6, 2018 but to continue its current method of operation producing unbleached products. Following the end of bleached pulp production, the W-3 Paper Machine will produce unbleached linerboard beginning on or about June 1, 2018. From that time forward, the Wallula Mill will produce exclusively unbleached paper on the W-3 Paper Machine.

The Wallula Mill performed a Notice of Construction (NOC) applicability review and determined that activities associated with the May 2018 cessation of bleached paper production do not constitute modifications and are not subject to NOC permitting requirements. This order provides enforceable voluntary emission limits, which though not required under the rules, are intended to confirm the non-applicability of Minor New Source Review (NSR) and Prevention of Significant Deterioration (PSD) requirements. The limits established by this order, presented in Table 1, cap emissions from the W-3 Paper Machine at the level demonstrated prior to shutting down the bleach plant. Any subsequent projects that may increase emissions due to increased production targets of the W-3 Paper Machine or short term emission increases may require NSR/PSD permitting if required based on application of the regulations to any such project.

The following actions will be carried out beginning in May 2018.

- Permanent shutdown of the Bleach Plant

- Permanent shutdown of the W-1 Paper Machine
- Permanent removal of the W-3 Paper Machine coater
- Permanent shutdown of the W-3 Infrared (IR) Dryer with a concurrent switch to steam drying
- High-yield, refined, virgin pulp will be produced consistent with linerboard fiber needs
- Supplemental kraft pulp furnish to the W-2 Paper Machine

The conversion to unbleached product at this machine will not affect any other operations at the Wallula Mill including:

- The historic steaming rate of the power boilers.
- The historic black liquor solids throughput in the chemical recovery furnaces.
- The historic calcium carbonate throughput in the lime kiln.
- W-2 paper machine paper grades, production rates or associated emissions.

Additionally, the facility has stated that this conversion to unbleached product will not result in increases in short term emission rates from any unit.

The conversion to unbleached product will affect W-3 paper machine paper grades and associated VOC emissions

COMPLIANCE DEMONSTRATION AND DURATION

The Wallula Mill performed a Notice of Construction (NOC) applicability review and determined that the May 2018 actions do not constitute modifications and are not subject to NOC permitting requirements as outlined in a letter provided to Ecology on March 5, 2018. Nonetheless, this temporary State Administrative Order establishes voluntary emission limits, monitoring, reporting and recordkeeping requirements as outlined herein for the Wallula Mill W-3 Paper Machine and shall become effective for 270 days upon the date of its issuance. Following effective termination of this Order, W-3 Paper Machine limitations shall be reflected in the mill's Air Operating Permit as established in a regulatory order issued by the Department of Ecology, if deemed necessary.

Therefore, it is ordered that the facility comply with the following limits and conditions:

LIMITS AND CONDITIONS

The requirements in this condition apply to W-3 Paper Machine. The limits specified in this condition shall not be exceeded. The limits shall be monitored at the monitoring frequency specified. Reporting shall be as specified for each parameter.

Condition	Parameter	Limit and Averaging Period	Monitoring, Reporting, Recordkeeping
1.1	Bleach Plant W-1 W-3 coater W-3 IR dryer	Shutdown	Provide written verification of permanent shutdown by July 1, 2018.
1.2	W-3 Unbleached Paper Production	800 MDT/Day, Monthly Avg.	Total W-3 machine-dry tons paper (MDT) production, calendar month average

Condition	Parameter	Limit and Averaging Period	Monitoring, Reporting, Recordkeeping
1.3	VOC*	1.6 Tons/Month	W-3 VOC emissions reported monthly. Monthly records of W-3 production and VOC emissions to be retained for five years.

*Actual monthly VOC emissions will be calculated by multiplying the monthly total tons of paper by 0.13 lbs. VOC/MDT. The emission factor for VOCs from paper machines is derived from the value presented in Table 4.33, NCASI Technical Bulletin No. 973, Compilation of 'Air Toxic' and Total Hydrocarbon Emissions Data for Pulp and Paper Mill Sources – A Second Update, February 2010.

Ecology may modify conditions contained herein, pursuant to legal requirements, based on air quality, emissions monitoring results, or upon the request of Boise White Paper.

This Order may be terminated by the permittee at any time during its term upon written notice to the Department of Ecology's Industrial Section.

YOUR RIGHT TO APPEAL

You have a right to appeal this Order to the Pollution Control Hearing Board (PCHB) within 30 days of the date of receipt of this Order. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal you must do both of the following within 30 days of the date of receipt of this Order:

- File your appeal and a copy of this Order with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this Order on Ecology in paper form - by mail or in person. (See addresses below.) E-mail is not accepted.

You must also comply with other applicable requirements in Chapter 43.21B RCW and Chapter 371-08 WAC.

Your appeal alone will not stay the effectiveness of this Order. Stay requests must be submitted in accordance with RCW 43.21B.320.

ADDRESS AND LOCATION INFORMATION

Street Addresses	Mailing Addresses
<p>Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503</p> <p>Pollution Control Hearings Board 1111 Israel Road SW STE 301 Tumwater, WA 98501</p>	<p>Department of Ecology Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608</p> <p>Pollution Control Hearings Board PO Box 40903 Olympia, WA 98504-0903</p>

MORE INFORMATION

- **Pollution Control Hearings Board**
www.eho.wa.gov/Boards_PCHB.aspx
- **Chapter 43.21B RCW, Environmental Hearings Office – Pollution Control Hearings Board**
<http://apps.leg.wa.gov/RCW/default.aspx?cite=43.21B>
- **Chapter 371-08 WAC – Practice and Procedure**
<http://apps.leg.wa.gov/WAC/default.aspx?cite=371-08>
- **Chapter 34.05 RCW – Administrative Procedure Act**
<http://apps.leg.wa.gov/RCW/default.aspx?cite=34.05>
- **Chapter 70.94 RCW, Washington Clean Air Act**
<http://apps.leg.wa.gov/RCW/default.aspx?cite=70.94>

SIGNATURES

Reviewed by:

Signature Authority:

Robert Carruthers, P.E.
Environmental Engineer
Waste 2 Resources Program

James DeMay, P.E.
Industrial Section Manager
Waste 2 Resources Program

Date

Date