



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor  
Toni Hardesty, Director

August 17, 2007

**Certified Mail No. 7102 0243 6844 0000 0144**

Sue Somers  
Environmental Engineering Manger  
Potlatch Forest Products Corporation, Pulp and Paperboard Division  
P.O. Box 1126  
Lewiston, ID 83501-1126

RE: Facility ID No. 069-00001, Potlatch Forest Products Corporation,  
Idaho Pulp and Paperboard Division, Lewiston  
Final Permit Letter

Dear Ms. Somers:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2007.0056 to Potlatch Forest Products Corporation, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on April 11, 2007. This permit is effective immediately and replaces PTC No. 069-00001, issued on September 16, 1996, the terms and conditions of which no longer apply. This permit does not release Potlatch Forest Products Corporation from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

You have requested that the permit to construct provisions be incorporated into the Tier I operating permit through an administrative amendment in accordance with the Rules for the Control of Air Pollution in Idaho (IDAPA 58.01.01.381). In accordance with IDAPA 58.01.01.381.03.b you may implement the changes authorized by the permit to construct while DEQ processes the Tier I administrative amendment.

Pursuant to General Provision 5 of your permit, it is required that Construction and Operation Notification be provided. Please provide this information as listed to DEQ's Lewiston Regional Office, 1118 "F" Street, Lewiston, ID 83501.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Clayton Steele, Air Quality Specialist, at 208-799-4370 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends 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.

Potlatch Forest Products Corporation, IPPD, Lewiston  
Final Permit Letter, August 17, 2007  
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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 call Dan Pitman at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mike Simon".

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

Enclosures

MS\DP\sd

Permit No. P-2007.0056

ec: Hudson Mann, Clayton Steele, Lewiston Regional Office  
Bill Rogers, Permit Coordinator (Ltr only)  
Dan Pitman, Permit Writer  
Marilyn Seymore/ Pat Rayne, Air Quality Division  
Laurie Kral, US EPA Region 10  
Permit Binder  
Source File  
Phyllis Heitman (Ltr Only)  
Reading File (Ltr Only)  
Joan Lechtenberg, Public Comment



**Air Quality**  
**PERMIT TO CONSTRUCT**  
 State of Idaho  
 Department of Environmental Quality

**PERMIT No.:** P-2007.0056  
**FACILITY ID No.:** 069-00001  
**AQCR:** 062                      **CLASS:** A  
**SIC:** 2631                      **ZONE:** 11  
**UTM COORDINATE (km):** 501.9, 9,141.5

**1. PERMITTEE**

Potlatch Forest Products Corporation, Idaho Pulp & Paper Division

**2. PROJECT**

Changes to Existing Monitoring Requirements for the Oxygen Delignification System

**3. MAILING ADDRESS**

803 Mill Road

**CITY**

Lewiston

**STATE**

ID

**ZIP**

83501

**4. FACILITY CONTACT**

Sue Somers

**TITLE**

Environmental Manager

**TELEPHONE**

208-799-4101

**5. RESPONSIBLE OFFICIAL**

Frank Radle

**TITLE**

Mill Manager

**TELEPHONE**

208-799-1561

**6. EXACT PLANT LOCATION**

803 Mill Road, Lewiston, Idaho

**COUNTY**

Nez Perce

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Pulp and paperboard manufacturing

**8. PERMIT AUTHORITY**

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, and 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.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) 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; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the 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.

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

This permit has been granted on the basis of design information presented with its application. Changes in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.

DAN PITMAN, PERMIT WRITER  
 DEPARTMENT OF ENVIRONMENTAL QUALITY

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER  
 DEPARTMENT OF ENVIRONMENTAL QUALITY

<b>DATE MODIFIED/REVISED:</b>	August 17, 2007
<b>DATE ISSUED:</b>	September 16, 1996

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## Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
PTC	permit to construct
SIC	Standard Industrial Classification
T/yr	tons per year
UTM	Universal Transverse Mercator

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0056**

<b>Permittee:</b>	Potlatch Forest Products Corporation
<b>Location:</b>	Lewiston, Idaho

**Facility ID No. 069-00001**

**1. PERMIT TO CONSTRUCT SCOPE**

***Purpose***

- 1.1 The purpose of this permit is to remove continuous emission monitoring requirements on the oxygen delignification system.
- 1.2 All permit conditions are new or revised by this permitting action and are identified by a date citation located directly under the permit condition and on the right hand margin.
- 1.3 This PTC replaces PTC No. 069-00001, issued September 16, 1996, the terms and conditions of which shall no longer apply.

***Regulated Sources***

- 1.4 Table 1.1 lists all sources of regulated emissions in this PTC.

**Table 1.1 SUMMARY OF REGULATED SOURCES**

<b>Permit Section</b>	<b>Source Description</b>	<b>Emissions Control(s)</b>
2.	Oxygen Delignification System	None

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<b>Location:</b>	Lewiston, Idaho	

**2. OXYGEN DELIGNIFICATION SYSTEM**

**2.1 Process Description**

Oxygen delignification is the process of using oxygen to remove lignin from brownstock. Using oxygen as part of the bleaching process reduces the formation of chlorinated organics.

**2.2 Emissions Control Description**

**Table 2.1 Oxygen Delignification**

<b>Emissions Unit(s) / Process(es)</b>	<b>Emissions Control Device</b>	<b>Emissions Point</b>
Oxygen Delignification	None	Oxygen Delignification Stack

***Emissions Limits***

**2.3 Emissions Limits**

Carbon monoxide (CO) emissions from the oxygen delignification system stack shall not exceed 74.5 tons per any consecutive 12-month period as determined by multiplying the emission factor required to be developed by this permit by the throughput of air dried pulp each consecutive 12-month period.

**[August 17, 2007]**

**2.4 Opacity Limit**

Emissions from any stack, vent, or functionally equivalent opening 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.

**[August 17, 2007]**

***Monitoring and Recordkeeping Requirements***

**2.5 Performance Test**

Once each five years the permittee shall conduct a carbon monoxide performance test on the oxygen delignification system. The performance test shall be conducted in accordance with the Test Methods and Procedures specified by IDAPA 58.01.01.157. The test shall be conducted under worst case normal operating conditions and the following shall be recorded during the source test:

- Oxygen rate to the system.
- Lignin content (i.e. Kappa number) of the pulp before and after the system.
- The throughput of air dried pulp during the test.

The performance test report shall include development of an emission factor in units of pounds of carbon monoxide emitted per air dried ton of pulp processed (lb/ADT).

**[August 17, 2007]**

**2.6 Throughput Monitoring**

The permittee shall monitor and record the tons of air dried pulp processed through the oxygen delignification system each month and each consecutive 12-month period.

**[August 17, 2007]**

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<b>Location:</b>	Lewiston, Idaho	

**2.7    Emissions Calculations**

Each month, after the initial carbon monoxide performance test is completed on the oxygen delignification system, the permittee shall calculate the carbon monoxide emissions by multiplying the carbon monoxide emission factor by the tons of air dried pulp processed over the most recent consecutive 12-month period. The permittee shall maintain emissions records on-site in units of tons of carbon monoxide emitted each consecutive 12-month period. The records shall be made available to DEQ representatives upon request.

**[August 17, 2007]**

***Reporting Requirements***

**2.8    Reporting**

If carbon monoxide emissions are calculated, as required by this permit, to be greater than 74.5 tons per any consecutive 12-month period the permittee shall submit an excess emissions report in accordance with IDAPA 58.01.01.135 to the following address:

Air Quality Permit Compliance  
Department of Environmental Quality  
Lewiston Regional Office  
1118 F Street  
Lewiston, Idaho 83501

**[August 17, 2007]**

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0056**

<b>Permittee:</b>	Potlatch Forest Products Corporation	<b>Facility ID No. 069-00001</b>
<b>Location:</b>	Lewiston, Idaho	

**3. PERMIT TO CONSTRUCT GENERAL PROVISIONS**

***General Compliance***

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 and 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.]**
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. 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***

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
  - a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. 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***

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
  - a. A notification of the date of initiation of construction, within five working days after occurrence;
  - b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
  - c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than 60 days or less than 30 days prior to such date;

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**Permittee:** Potlatch Forest Products Corporation

**Facility ID No. 069-00001**

**Location:** Lewiston, Idaho

- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. 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, 5/1/94]**

***Performance Testing***

6. 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.

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.

Within 30 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 written 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]**

***Monitoring and Recordkeeping***

7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information 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 and 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***

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

**[IDAPA 58.01.01.130-136, 4/5/00]**

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<b>Location:</b>	Lewiston, Idaho	

***Certification***

9. 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***

10. 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***

11. 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***

12. 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***

13. 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.