



STATE OF IDAHO
DIVISION OF
ENVIRONMENTAL QUALITY

PR
Ave

1410 North Hilton, Boise, ID 83706-1255, (208) 373-0502

Philip E. Batt, Governor

November 6, 1998

CERTIFIED MAIL #P 102 113 535

Brian Brazil
Senior Environmental Engineer
Potlatch Corporation
Idaho Division
Post Office Box 1016
Lewiston, Idaho 83501-1016

RE: P-980110, Potlatch Corporation, Lewiston
(Temporary Boilers, Revised Permit to Construct #069-00001)

Dear Mr. Brazil:

On October 8, 1998, the Division of Environmental Quality (DEQ) received a Permit to Construct (PTC) application to amend the PTC issued for the operation of temporary boilers at Potlatch's Pulp and Paperboard/Consumer Products facility in Lewiston. Based on review of the application, and all applicable state and federal rules and regulations, DEQ finds this project meets the provisions of IDAPA 16.01.01.200 (*Rules for the Control of Air Pollution in Idaho*). Enclosed is revised PTC #069-00001.

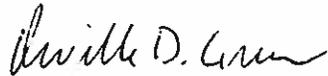
Due to the temporary nature of the permitted equipment, General Provision E of the permit does not apply but remains in the permit for permitting uniformity. This letter serves as DEQ permission to disregard General Provision E for the operation of the temporary boilers. Please be advised that in addition to the PTC requirements, New Source Performance Standards (NSPS) also mandate reporting and recordkeeping requirements in accordance with 40 CFR 60 Subpart Dc.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, Department of Health and Welfare, Administrative Procedures Section, 450 West State Street, Tenth Floor, Boise, Idaho 83720-5450, within thirty-five (35) days of the date of this decision.

Brian Brazil
November 6, 1998
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If you have any questions regarding the terms or conditions of the enclosed permit, contact Susan J. Richards, Chief, Air Quality Permitting Bureau, at (208) 373-0502.

Sincerely,



Orville D. Green
Assistant Administrator
Air and Hazardous Waste

Enclosure

ODG/RM/ms

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cc: P. Rayne/AFS Source File (069-00001)
R. Wilkosz/TSB Permit File Manual
Lewiston RO COF
EPA IOO

STATE OF IDAHO
 PERMIT TO CONSTRUCT
 AN AIR POLLUTION
 EMITTING SOURCE

PERMIT NUMBER

0 6 9 - 0 0 0 0 1

AQCR

0 6 2

CLASS

A 1

SIC

2 6 3 1

ZONE

1 1

UTM COORDINATE (km)

5 0 1 . 9 . 5 1 4 1 . 5

1. PERMITTEE

Potlatch Corporation, Pulp & Paperboard/Consumer Products Division

2. PROJECT

Temporary Boilers

3. MAILING ADDRESS

Post Office Box 1126

CITY

Lewiston

STATE

Idaho

ZIP CODE

83501

4. SITE LOCATION COUNTY

Nez Perce

NO. OF FULL-TIME EMPLOYEES

840

PROPERTY AREA AT SITE (Acreage)

808

5. PERSON TO CONTACT

Brian Brazil

TITLE

Senior Environmental Engineer

TELEPHONE

(208) 799-1824

6. EXACT PLANT LOCATION

East of Lewiston, Idaho

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Bleached Kraft Pulp and Paperboard Manufacturing

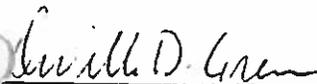
8. GENERAL CONDITIONS

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, Section 16.01.01.200, and pertains only to emissions of air contaminants that are regulated by the State of Idaho and to the sources specifically allowed to be constructed 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 Idaho Department of Health and Welfare, Division of Environmental Quality (DEQ) or its officers, agents, or employees, assumes 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 is not transferable to another person, place, piece or set of 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 of design or equipment that result in any change in the nature or amount of emissions must be approved in advance by DEQ unless exempted by the *Rules for the Control of Air Pollution in Idaho* Sections 220 through 225.


 ASSISTANT ADMINISTRATOR
 DIVISION OF ENVIRONMENTAL QUALITY

DATE: November 6, 1998

**PERMIT TO CONSTRUCT
PERMITTEE, PROJECT, AND LOCATION**Potlatch Corporation
Temporary Boilers
Lewiston**PERMIT NUMBER**

069 - 00001

SOURCE

Lewiston, Temporary Boilers

1. OPERATING REQUIREMENTS**1.1 Fuel Type**

Fuel combusted in the temporary boilers shall be exclusively natural gas.

1.2 Boiler Size

No more than two temporary boilers shall be operated at any given time, and these boilers shall each have a heat capacity less than 100 million BTU per hour.

1.3 Operating Schedule

The temporary boilers may be operated for unlimited hours, anytime one or more of the permanent boilers are shut down. The temporary boilers may also be operated concurrently with all of the permanent boilers for up to thirty (30) days total operating time in any twelve (12) month period.

2. MONITORING AND RECORDKEEPING REQUIREMENTS**2.1 Boiler Operating Time**

For each temporary boiler, the permittee shall monitor and record the hours of operation, date of operation, and the operational status of all permanent boilers. This record shall be maintained on-site and shall be made available to DEQ representatives upon request.

3. REPORTING REQUIREMENTS**3.1 Exceedances**

Upon finding an exceedance of the requirements listed in Sections 1 and 2 of this permit, the permittee shall submit a written report to DEQ within a reasonable time period. The report shall contain the date, duration, and description of the exceedance.

DATE: November 6, 1998

PERMIT TO CONSTRUCT GENERAL PROVISIONS

- A. 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 emission 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.
- B. 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.
- C. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
1. To enter at reasonable times upon the premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 2. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack emission testing in conformance with the DEQ's "Procedures Manual for Air Pollution Control" when deemed appropriate by the Director.
- D. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- E. The permittee shall notify DEQ, in writing, of the required information for the following events within five (5) working days after occurrence:
1. Initiation of Construction - Date
 2. Completion/Cessation of Construction - Date
 3. Actual Production Start-up - Date
 4. Initial Date of Achieving Maximum Production Rate - Production Rate and Date
- F. If emission testing is specified, the permittee must schedule such testing within sixty (60) days after achieving the maximum production rate, but not later than one hundred and eighty (180) days after initial start-up. Such testing must **strictly** adhere to the procedures outlined in the DEQ's "Procedures Manual for Air Pollution Control," and shall not be conducted on weekends or state holidays without prior written DEQ approval. Testing procedures and specific time limitations may be modified by DEQ by prior negotiation if conditions warrant adjustment. DEQ shall be notified at least fifteen (15) days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to DEQ upon request.
- The maximum allowable operating rate shall be limited to 120% of the average operating rate attained during any performance test period, for which a test protocol has been granted prior approval by DEQ, unless (1) the test demonstrates noncompliance, (2) a more restrictive operating limit is specified elsewhere in this permit, or (3) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.
- G. 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.

DATE: November 6, 1998

November 6, 1998

MEMORANDUM

TO: Orville D. Green, Assistant Administrator
Air and Hazardous Waste Division

FROM: Susan J. Richards, Chief
Air Quality Permitting Bureau

SUBJECT: P-980110, Potlatch Corp., Pulp & Paperboard/Consumer Products, Lewiston
(Temporary Boilers, Revised PTC #069-00001)

PROJECT DESCRIPTION

Potlatch Corporation in Lewiston was recently issued a Permit to Construct (PTC) for the operation of two temporary boilers at their Lewiston Pulp and Paperboard/Consumer Products facility. These boilers are used as replacements when one of the permanent boilers is shut down. The permit contained an emission rate limit which restricts the operations and disallows the operational flexibility which was intended.

DISCUSSION

On September 3, 1998, the Idaho Department of Health and Welfare, Division of Environmental Quality (DEQ) issued a PTC to Potlatch Corporation for the operation of temporary boilers. On October 8, 1998, DEQ received a request from Potlatch Corporation to amend the PTC to allow for operational flexibility.

FEES

Fees apply to this facility in accordance with IDAPA 16.01.01.526 because the facility is a major facility as defined in IDAPA 16.01.01.008.14. According to the 1998 Air Emissions Database Master List, Potlatch has paid fees for approximately 1,588 tons of pollutants required to be registered. This permitting action will not change the amount of pollutants required to be registered.

RECOMMENDATION

Based on review of the application materials and state and federal rules and regulations, staff recommend that Potlatch Corporation be issued a revised PTC for the operation of temporary boilers which will allow operational flexibility which was originally intended. It is also recommended that the cover letter for the revised permit waive the requirement of General Provision E due to the temporary nature of the equipment.

SJR/RM/ms G:\AH\WMCDOUGAL\POTLATCH\BOIL2.MM

cc: R. Wilkosz/TSB
P. Rayne/AFS
Lewiston RO
Source File (069-00001)
COF