



October 30, 2024

Spencer Giles  
Georgia-Pacific Consumer Operations, LLC  
401 NE Adams Street  
Camas, WA 98607

RE: Final Air Discharge Permit for Modification of Package Boiler

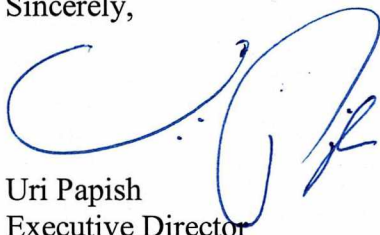
Dear Spencer Giles:

A final determination to issue Air Discharge Permit (ADP) 24-3666 has been completed for ADP application CL-3274 pursuant to Section 400-110(4) of the General Regulations for Air Pollution Sources of the Southwest Clean Air Agency (SWCAA). Public notice for ADP application CL-3274 was published in the permit section of SWCAA's website on August 08, 2024. SWCAA did not receive a request for a public comment period in response to the public notice and has concluded that significant public interest does not exist for this determination. Therefore, a public comment period will not be provided for this permitting action. Electronic copies of ADP 24-3666 and the associated Technical Support Document are available for public review in the "Recent Air Discharge Permits" section under the "Air Permits" link on SWCAA's website (<http://www.swcleanair.gov>). Original copies are enclosed for your files.

ADP 24-3666 may be appealed directly to the Pollution Control Hearings Board (PCHB) within thirty (30) days of receipt as provided in Revised Code of Washington (RCW) 43.21B.

If you have any questions or comments, or desire additional information, please contact me or Abraham Apfel at (360) 574-3058, extension 124.

Sincerely,



Uri Papish  
Executive Director

UP:AA





**AIR DISCHARGE PERMIT  
24-3666**

**Issued: October 30, 2024**

**Georgia-Pacific Consumer Operations, LLC**  
401 NE Adams Street Camas, WA 98607

**SWCAA ID – 2538**

REVIEWED BY:

*Clinton Lamoreaux*

Clinton Lamoreaux, Chief Engineer



APPROVED BY:

*Uri Papish*

Uri Papish, Executive Director

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**1. Equipment/Activity Identification**

<b>ID No.</b>	<b>Equipment/Activity</b>	<b>Control Equipment/Measure</b>
1	Package Boiler (Boiler 6), Rentech RTD -66, 2020-10	Ultra-low NO <sub>x</sub> burner, low sulfur fuel (Nat Gas), and flue gas recirculation (FGR)

**2. Permit Requirements**

The following tables detail the specific requirements of this Air Discharge Permit (ADP). In addition to the requirements listed below, equipment at this facility may be subject to other federal, state, and local regulations. The requirement number is identified in the left-hand column. The text of the requirement is contained in the middle column. The emission unit, equipment, or activity to which the requirement applies is listed in the right-hand column.

ADP 24-3666 supersedes ADP 20-3414 in its entirety.

**Emission Limits**

<b>Req. No.</b>	<b>Emission Limits</b>	<b>Equipment/Activity ID No.</b>																								
1.	<p>Emissions from the Package Boiler (Boiler 6) must not exceed any of the following:</p> <table border="1" data-bbox="331 1024 1224 1325"> <thead> <tr> <th data-bbox="331 1024 812 1056"><b>Pollutant</b></th> <th colspan="2" data-bbox="812 1024 1224 1056"><b>Emission Limits</b></th> </tr> <tr> <td data-bbox="331 1056 812 1094"></td> <th data-bbox="812 1056 1024 1094">Long term</th> <th data-bbox="1024 1056 1224 1094">Short term</th> </tr> </thead> <tbody> <tr> <td data-bbox="331 1094 812 1131">Nitrogen Oxides</td> <td data-bbox="812 1094 1024 1131">6.24 tons</td> <td data-bbox="1024 1094 1224 1131">12 ppmvd</td> </tr> <tr> <td data-bbox="331 1131 812 1169">Carbon Monoxide</td> <td data-bbox="812 1131 1024 1169">9.49 tons</td> <td data-bbox="1024 1131 1224 1169">30 ppmvd</td> </tr> <tr> <td data-bbox="331 1169 812 1207">Volatile Organic Compounds</td> <td data-bbox="812 1169 1024 1207">2.31 tons</td> <td data-bbox="1024 1169 1224 1207"></td> </tr> <tr> <td data-bbox="331 1207 812 1245">Particulate Matter, PM, filterable</td> <td data-bbox="812 1207 1024 1245">0.80 tons</td> <td data-bbox="1024 1207 1224 1245"></td> </tr> <tr> <td data-bbox="331 1245 812 1283">Particulate Matter, PM, condensable</td> <td data-bbox="812 1245 1024 1283">2.39 tons</td> <td data-bbox="1024 1245 1224 1283"></td> </tr> <tr> <td data-bbox="331 1283 812 1320">Sulfur Dioxide</td> <td data-bbox="812 1283 1024 1320">0.25 tons</td> <td data-bbox="1024 1283 1224 1320"></td> </tr> </tbody> </table> <p>The long-term emission limits are 12-month rolling sums calculated consistent with Section 6 of the TSD for this ADP. The short-term emission limits are determined as a 1-hour average, corrected to 3% O<sub>2</sub>.</p> <p>The short-term emission limits identified above (ppm or hourly averaging time) do not apply during boiler startup for a maximum of 8 hours. A boiler startup is defined as the length of time from establishment of a flame in the boiler to achieving a steady boiler steaming rate of 16 kpph (20% of rated boiler capacity). The permittee must minimize the startup period. Loss of flame in the boiler to perform required maintenance during startup will restart the 8-hour startup period, beginning with the new establishment of flame in the boiler.</p>	<b>Pollutant</b>	<b>Emission Limits</b>			Long term	Short term	Nitrogen Oxides	6.24 tons	12 ppmvd	Carbon Monoxide	9.49 tons	30 ppmvd	Volatile Organic Compounds	2.31 tons		Particulate Matter, PM, filterable	0.80 tons		Particulate Matter, PM, condensable	2.39 tons		Sulfur Dioxide	0.25 tons		1
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2.	Visible emissions from the Package Boiler must not exceed zero percent (0%) opacity for more than three (3) minutes in any one-hour period as determined in accordance with EPA Method 9 and SWCAA Method 9.	1																								

**Operating Limits and Requirements**

<b>Req. No.</b>	<b>Operating Limits and Requirements</b>	<b>Equipment/ Activity ID No.</b>
3.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
4.	Operations that cause or contribute to a nuisance odor must use recognized good practice and procedures to reduce these odors to a reasonable minimum.	Facility-wide
5.	Emission units and activities identified in this ADP must be maintained and operated in total and continuous conformity with the conditions identified in this ADP. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this ADP, including directing the facility to cease operations until corrective action can be completed.	1
6.	Each pollution control device must be operated whenever the processing equipment served by that air pollution control device is in operation. Control devices must be operated and maintained in accordance with the manufacturer's specifications. Furthermore, air pollution control devices must be operated in a manner that minimizes emissions.	1
7.	All exhausts must be discharged vertically into the ambient air above the level of the building roof. Any device that obstructs or prevents vertical discharge is prohibited.	1
8.	Package Boiler (Boiler 6) must only be fired on natural gas.	1
9.	If the test results from any boiler emission monitoring event indicate that emission concentrations may exceed the permit limits identified in this permit, the permittee must either perform 60 minutes of additional monitoring to more accurately quantify CO and NO <sub>x</sub> emissions, or initiate corrective action. Additional testing or corrective action must be initiated as soon as practical but no later than 3 days after the potential exceedance is identified. Corrective action includes tuning, maintenance by service personnel, limitations of boiler load, or other action taken to maintain compliance with permit limits. Monitoring of boiler emissions must be conducted within 3 days following completion of corrective action to confirm the corrective action has been effective. Initiation of corrective action does not shield the permittee from enforcement by SWCAA.	1
10.	The permittee must provide safe access and sampling ports for source testing of the exhaust stack after the final pollution control device. Safe access must consist of permanently constructed platforms on the stacks. The sampling ports must meet the requirements of 40 CFR, part 60, Appendix A Method 1. Other arrangements may be acceptable if approved by SWCAA prior to installation.	1

**Monitoring and Recordkeeping Requirements**

<b>Req. No.</b>	<b>Monitoring and Recordkeeping Requirements</b>	<b>Equipment/ Activity ID No.</b>
11.	Except for data logged by a computerized data acquisition system, each record required by this ADP must include the date and the name of the person making the record entry, at minimum. If a control device or process is not operating, a record must be made to that effect.	Facility-Wide
12.	All records required by this ADP must be kept for a minimum period of no less than five (5) years and must be maintained in a form readily available for inspection by SWCAA representatives.	1
13.	Maintenance activities that may affect emissions (e.g. boiler tests or emission monitoring) must be recorded for each occurrence.	1
14.	Emission monitoring and source emission test results must be recorded for each occurrence.	1
15.	The permittee must monitor and record the following information: (a) Natural gas usage for the boiler      Recorded monthly (b) Hours of operation for the boiler      Recorded monthly (c) Date, time and length of time in startup      Recorded for each occurrence (d) Maintenance and repair activities      Recorded for each occurrence	1

**Emission Monitoring and Testing Requirements**

<b>Req. No.</b>	<b>Emission Monitoring and Testing Requirements</b>	<b>Equipment/ Activity ID No.</b>
16.	Emission testing of the Package Boiler (Boiler 6) must be conducted no later than 60 days after initial operation. Subsequent emission testing must be conducted every five years no later than the end of the month of the initial test in accordance with Appendix A of this Permit.	1
17.	The Package Boiler (Boiler 6) must be emission monitored on an annual cycle, no later than the end of the calendar month in which the initial emission testing was performed. Emission monitoring is not required in any year in which emission testing is performed.	1

**Reporting Requirements**

<b>Req. No.</b>	<b>Reporting Requirements</b>	<b>Equipment/ Activity ID No.</b>
18.	Excess emissions must be reported to SWCAA as follows: (a) As soon as possible, but no later than twelve (12) hours after discovery for emissions that represent a potential threat to human health or safety; (b) As soon as possible, but no later than forty-eight (48) hours after discovery for emissions which the Permittee wishes to claim as unavoidable pursuant to SWCAA 400-107(1); and (c) No later than thirty (30) calendar days after the end of the month of discovery for all other excess emissions.	1
19.	Deviations from permit conditions must be reported as soon as possible but no later than 30 days after the end of the month during which the deviation is discovered.	1
20.	All air quality related complaints received by the Permittee must be reported to SWCAA within three (3) calendar days of receipt. Complaint reports must include the date and time of the complaint, the name and contact information (if available) for the complainant, the nature of the complaint, and any actions taken by the Permittee to address the complaint.	Facility-Wide
21.	Upset conditions must be reported to SWCAA as soon as possible after discovery. The permittee may provide notification to SWCAA via telephone. A message may be left on the answering machine for upset conditions that occur outside of normal business hours.	1
22.	The Permittee must submit a semi-annual report to SWCAA by September 15 <sup>th</sup> and March 15 <sup>th</sup> for the six-month periods January through June and July through December respectively: (a) The total amount of natural gas usage for Package Boiler (Boiler 6); (b) Hours of operation of the boiler; (c) Date, time and length of time in startup for each occurrence; and (d) Air emissions of criteria air pollutants.	1
23.	The results of all emission testing required by this ADP must be reported to SWCAA in writing within forty-five (45) calendar days of test completion.	1
24.	Emission monitoring results must be reported to SWCAA in writing within fifteen (15) calendar days of completion.	1

**3. General Provisions**

<b>Req. No.</b>	<b>General Provisions</b>
A.	For the purpose of ensuring compliance with this ADP, duly authorized representatives of the Southwest Clean Air Agency must be permitted access to the Permittee's premises and the facilities being constructed, owned, operated and/or maintained by the Permittee for the purpose of inspecting said facilities. These inspections are required to determine the status of compliance with this ADP and applicable regulations and to perform or require such tests as may be deemed necessary.
B.	The provisions, terms, and conditions of this ADP bind the Permittee, its officers, directors, agents, servants, employees, successors and assigns, and all persons, firms, and corporations acting under or for the Permittee.
C.	The requirements of this ADP survive any transfer of ownership of the source or any portion thereof.
D.	This ADP must be posted conspicuously at or be readily available near the source.
E.	This ADP will be invalidated, in whole or in part, if construction or installation of any new or modified equipment has not commenced within eighteen (18) months from date of issuance, if construction is discontinued for a period of eighteen (18) months or more without prior SWCAA approval, or if construction is not completed within a reasonable time.
F.	This ADP does not supersede requirements of other agencies with jurisdiction and further, this ADP does not relieve the Permittee of any requirements of any other governmental agency. In addition to this ADP, the Permittee may be required to obtain permits or approvals from other agencies with jurisdiction.
G.	Compliance with the terms of this ADP does not relieve the Permittee from the responsibility of compliance with SWCAA General Regulations for Air Pollution Sources, previously issued Regulatory Orders, RCW 70A.15, Title 173 WAC or any other applicable emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply.
H.	If any provision of this ADP is held to be invalid, all unaffected provisions of the ADP will remain in effect and be enforceable.
I.	No change in this ADP will be made or be effective except as may be specifically set forth by written order of the Southwest Clean Air Agency upon written application by the Permittee for the relief sought.
J.	The Southwest Clean Air Agency may, in accordance with RCW 70A.15, impose such conditions as are reasonably necessary to ensure the maintenance of compliance with the terms of this ADP, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act.
K.	For the purposes of establishing if a condition of this ADP has been violated or is being violated, nothing in this ADP precludes the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test procedures or methods had been performed.



## Appendix A Emission Testing Requirements Package Boiler (Boiler 6)

**1. Introduction:**

The purpose of this testing is to quantify emissions from the Package Boiler (Boiler 6) and demonstrate compliance with the requirements of this Permit and applicable air quality regulations.

**2. Testing Requirements:**

a. **Testing Schedule.** Initial emission testing of Package Boiler (Boiler 6) must be conducted no later than 60 days after initial operation. Subsequent emission testing of the Package Boiler (Boiler 6) must be conducted every 5 years thereafter, no later than the end of the calendar month in which the initial emission test was performed.

Emission testing conducted more than three months prior to a scheduled due date will not satisfy the periodic source emission testing requirement unless prior written approval is obtained from SWCAA.

b. **Test Plan.** A comprehensive test plan must be submitted to SWCAA for review and approval at least 30 calendar days prior to the initial test. For each subsequent test, a comprehensive test plan must be submitted to SWCAA for review and approval at least 10 business days in advance of the test. SWCAA personnel must be informed at least five business days prior to testing so that a representative may be present during testing.

c. **Test Location.** Sampling must be conducted at the boiler exhaust stack.

d. **Test Runs/Reference Test Methods.** A minimum of three (3) test runs must be for each constituent listed below to ensure the data are representative. Compliance must be demonstrated by averaging the results of the three individual sampling runs.

<u>Constituent</u>	<u>Reference Test Method</u>	<u>Minimum Test Run Duration</u>
Flow rate, temperature	EPA Methods 1 and 2	N/A
O <sub>2</sub> content	EPA Method 3 or 3A	60 minutes
Moisture content	EPA Method 4	60 minutes
NO <sub>x</sub>	EPA Method 7E	60 minutes
CO	EPA Method 10	60 minutes
Opacity (initial test only)	SWCAA Method 9	6 minutes*

\* If visible emissions are observed during any 6 minute period, the affected test run must be extended to a length of 60 minutes.

**3. Source Operation:**

a. **Source Operations.** Source operations during the emissions test must be representative of maximum intended operating conditions.

**Appendix A**  
**Emission Testing Requirements**  
**Package Boiler (Boiler 6)**

- b. **Record of Production Parameters.** Production related parameters and equipment operating conditions must be recorded during emissions testing to correlate operating conditions with emissions. Recorded parameters must, at a minimum, include boiler fuel consumption, process startups and shutdowns, and plant adjustments. All recorded production parameters must be documented in the test results report.

**4. Reporting Requirements:**

- a. **Test Report.** Unless otherwise directed by SWCAA, a final test report must be prepared and submitted in an approved electronic format to SWCAA within forty-five (45) calendar days of test completion. Each test report must include, at a minimum, the following information:
- (1) Description of the source including manufacturer, model number and design capacity of the equipment, and the location of the sample ports or test locations,
  - (2) Date of the report, time and date of the test and identification and qualifications of the test personnel involved, including identification of SWCAA personnel observing the test, if any,
  - (3) Summary of results, reported in units and averaging periods consistent with the applicable emissions standard or unit (ppmvd, ppmvd @ 3% O<sub>2</sub>, lb/hr and lb/MMBtu),
  - (4) Summary of control system or equipment operating conditions,
  - (5) Summary of production related parameters including but not limited to:
    - a. Fuel type and heat content during testing,
    - b. Firing rate (MMBtu/hr),
    - c. Steam flowrate, and
    - d. Stack diameter as measured through each set of ports.
  - (6) A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation,
  - (7) A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation,
  - (8) Copies of field data and example calculations,
  - (9) Chain of custody information,
  - (10) Calibration documentation,
  - (11) Discussion of any abnormalities associated with the results, startups, shutdowns or adjustments, and
  - (12) A statement signed by the senior management official of the testing firm certifying the validity of the source test report.

**5. Changes to Testing Requirements**

The source test must be conducted as specified in the sections above. The Permittee may submit a written request to SWCAA for approval of minor modifications to the requirements above or the testing schedule. Upon review of the request and in accordance with EPA delegation, SWCAA will inform the Permittee in writing of any approved modifications.

## **Appendix B**

### **Emission Monitoring Requirements**

#### **Package Boiler (Boiler 6)**

#### **1. Background**

The purpose of emission monitoring is to quantify emissions from the Package Boiler (Boiler 6), provide a basis for adjust the boiler as necessary to minimize emissions, and to provide a reasonable assurance that the boiler is operating properly.

#### **2. Test Constituents and Test Methods**

- (a) Oxygen (O<sub>2</sub>) using a calibrated portable combustion analyzer or EPA Methods 3 or 3A;
- (b) Nitrogen oxides (NO<sub>x</sub>) using a calibrated portable combustion analyzer or EPA Method 7E; and
- (c) Carbon monoxide (CO) using a calibrated portable combustion analyzer or EPA Method 10.

Combustion analyzers include electrochemical cell combustion analyzers, analyzers used for reference method testing, or other analyzers pre-approved by SWCAA.

#### **3. Monitoring Requirements**

- (a) Dates. Emission monitoring must be conducted at least once within every twelve (12) month period no later than the end of the month of the initial source test, while firing on natural gas, unless the Package boiler is not in use during that year, or a reference method source testing was conducted on that unit during that year.

Emission monitoring conducted more than three months prior to the scheduled due date will not satisfy the periodic source emission monitoring requirement unless prior written approval is obtained from SWCAA.

- (b) Source Operation. Package boiler operation during the emissions test must be representative of current intended operating conditions.
- (c) Data Collection.
  - (1) Sampling must consist of at least one (1) test consisting of at least five (5) minutes of data collection following a "ramp-up phase." The ramp-up phase ends when analyzer readings have stabilized (less than 5% per minute change in emission concentration). Emission concentrations must be recorded at least once every thirty (30) seconds during the data collection phase. All test data collected following the ramp-up phase must be reported to SWCAA.
  - (2) The analyzer(s) response to span gas of a known concentration must be determined before and after testing. No more than twelve (12) hours may elapse between span gas response checks. The results of the analyzer response will not be valid if the pre and post response check results vary by more than 10% of the known span gas value.
  - (3) The CO and NO<sub>x</sub> span gas concentrations must be no less than 50% and no more than 200% of the emission concentration corresponding to the permitted emission limits. A lower concentration span gas may be used if it is more representative of measured concentrations. Ambient air may be used to zero the CO and NO<sub>x</sub> cells/analyzer(s) and span the oxygen cell/analyzer.
  - (4) If the monitoring results from any monitoring event indicate that emission concentrations exceed the permitted emission limits for the unit, the Permittee must

**Appendix B**  
**Emission Monitoring Requirements**  
**Package Boiler (Boiler 6)**

either perform sixty (60) minutes of additional monitoring to more accurately quantify CO and NO<sub>x</sub> emissions, or initiate corrective action. Additional monitoring or corrective action must be initiated as soon as practical but no later than three (3) calendar days after the exceedance is identified. Corrective action includes tuning, maintenance by service personnel, limitation of unit load, or other action taken to maintain compliance with permitted limits. Monitoring of unit emissions must be conducted within three (3) calendar days following completion of any corrective action to confirm that the corrective action has been effective. Initiation of corrective action does not shield the Permittee from enforcement.

NO <sub>x</sub> (ppmvd @ 3% O <sub>2</sub> )	CO (ppmvd @ 3% O <sub>2</sub> )
12	30

#### 4. Reporting Requirements

Monitoring results must be reported to SWCAA within fifteen (15) calendar days of monitoring completion. The average of the results is evaluated against the requirements of ADP 24-3666. Results must be submitted on forms provided by SWCAA or in an alternative format previously approved by SWCAA. The report must include the following information:

- (a) A description of the emission unit, including manufacturer, model number and facility designation;
- (b) Time and date of the emissions evaluation;
- (c) Identification of the personnel involved;
- (d) Test "tapes" or other direct information generated by the monitoring equipment;
- (e) All collected data, calculations, and final results, reported in units consistent with the applicable emission standard or limit;
- (f) Final test result concentrations must be corrected to 3% O<sub>2</sub>;
- (g) A summary of control system or equipment operating conditions;
- (h) A description of the evaluation methods or procedures used, including all field data, quality assurance/quality control procedures and documentation; and
- (i) Calibration error checks documentation.

#### 5. Changes to Requirements

Emission monitoring must be conducted as specified in the sections above. The Permittee may submit a written request to SWCAA for approval of minor modifications to the requirements above or the monitoring schedule. Upon review of the request and in accordance with EPA delegation, SWCAA will inform the Permittee in writing of any approved modifications