

United States Environmental Protection Agency
Region 10, Office of Air and Waste
1200 Sixth Avenue, Suite 155, OAW-150
Seattle, Washington 98101-3123

Permit Number: R10PSD00200
Issued: September 27, 2018
Effective: September 27, 2018
AFS Plant I.D. Number: 53-071-00003

Prevention of Significant Deterioration Permit to Construct

In accordance with the provisions of Part C to Title I of the Clean Air Act (CAA) and 40 CFR Part 52.21, Federal Prevention of Significant Deterioration Program,

Packaging Corporation of America - Wallula Mill dba Boise White Paper, LLC

is authorized to construct (rebuild) and operate No. 3 Paper Machine and the other air pollutant emitting activities described in its application and this permit in accordance with the conditions listed in this permit in the following location:

Location: 31831 West Highway 12
Wallula, Washington

Company Contact: Bert Brown, Mill Manager
Boise White Paper, LLC
Wallula Mill
31831 West Highway 12
P.O. Box 138
Wallula, Washington 99363
Phone: 509.545.3270, Fax: 509.545.3298
Email: bertbrown@boisepaper.com

Source Contact: Paul Butkus, Environmental Manager
Boise White Paper, LLC
Wallula Mill
(same address as company contact)
Phone: 509.545.3241, Fax: 509.545.3338
Email: paulbutkus@boisepaper.com

Terms not otherwise defined in this permit have the meaning assigned to them in the referenced statutes and regulations. All terms and conditions of the permit are enforceable by the United States Environmental Protection Agency (EPA) and citizens under the CAA.

<p>_____ /s/ Timothy B. Hamlin, Director Office of Air and Waste U.S. EPA, Region 10</p>	<p><u>September 27, 2018</u> Date</p>
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AUTHORITY

The United States Environmental Protection Agency, Region 10 (EPA) is issuing this prevention of significant deterioration (PSD) permit pursuant to Part C to Title I of the CAA, 42 USC §§ 7470 to 7492, the implementing PSD air quality regulations at 40 CFR 52.21 and the Federal Implementation Plan at 40 CFR 52.2497 (also see 80 FR 23721, April 29, 2015). This proposed action is based upon the application initially submitted by Packaging Corporation of America, doing business as Boise White Paper, LLC (PCA or permittee) on May 22, 2018, supplemental submittals identified in the administrative record for this permit action, and upon the technical analyses performed by the EPA.

1. Source Information and Project Description

PCA owns and operates a kraft pulp and paper mill and corrugated container plant located in Wallula, Washington. PCA proposed to rebuild its No. 3 paper machine to increase the maximum daily capacity of this machine from approximately 800 machine-dried tons per day (MDT/day) to 1,400 MDT/day of unbleached linerboard (annual average) with a maximum daily production capacity of 1,680 MDT/day. The project also entails replacement of the Bauer valve and sawdust blower for the No. 2 M&D digester to increase pulp production. A non-condensable gas white liquor scrubber system will be added as a chemical recovery unit for sulfur recovery and cost reduction as part of the project. The project will result in an increase in the utilization of several emission units throughout the facility.

The project is subject to PSD for carbon monoxide (CO), nitrogen oxides (NO_x), and greenhouse gases (GHG). As explained in Section 3 of the Fact Sheet, the Washington Department of Ecology is the CAA PSD permitting authority for CO and NO_x, while the EPA is the CAA PSD permitting authority for GHG. The GHG emission increase is the result of increased utilization of the No. 2 and 3 recovery furnaces and the lime kiln.

This permit authorizes PCA to modify and operate the Wallula Mill at the location identified on Page 1 of this permit consistent with the representations in the permit application and subject to the conditions in this permit.

2. Generally Applicable Requirements

- 2.1 If the permittee does not construct or operate the source or modification in accordance with the application and supporting materials submitted by the permittee as identified in the Fact Sheet for this permit action and the terms of this PSD permit, the permittee will be subject to appropriate enforcement action as provided in 40 CFR 52.21(r)(1).
- 2.2 As provided in 40 CFR 52.21(r)(2), this permit becomes invalid if construction is not commenced within 18 months after the effective date of this permit, if construction is discontinued for 18 months or more, or if construction is not completed within a reasonable time. The EPA may extend the 18-month period upon a satisfactory showing that an extension is justified. This provision does not apply to the time period between the approved phases of a phased construction project; the permittee must commence

- construction of each such phase within 18 months of the projected and approved commencement date.
- 2.3 This permit does not relieve the permittee of the responsibility to comply fully with applicable provisions of any other requirements under applicable law, as provided in 40 CFR 52.21(r)(3).
 - 2.4 The permittee shall comply with all conditions of this permit including emission limitations that apply to the affected emissions units. Noncompliance with any permit term or condition is a violation of the permit and may constitute a violation of the CAA and is grounds for enforcement action and for a permit termination or revocation.
 - 2.5 It is not a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
 - 2.6 For the purpose of establishing whether or not the permittee has violated or is in violation of any requirement of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the permittee would have been in compliance with applicable requirements if the appropriate performance or reference test or procedure had been performed.
 - 2.7 The provisions of this permit are severable, and in the event of any challenge to any portion of this permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force.
 - 2.8 The permit may be revised, reopened, revoked and reissued or terminated for cause. The filing of a request by the permittee for a permit revision, revocation and re-issuance or termination or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
 - 2.9 A request by the permittee for modification, revocation and reissuance, or termination or a notification of planned changes or anticipated noncompliance does not stay any permit condition.
 - 2.10 EPA may grant an application for rescission of all or a specific portion of this permit, pursuant to 40 CFR 52.21(w), if the permittee submits an application requesting such rescission and shows that 40 CFR 52.21 no longer applies to an emission unit or units subject to this permit.
 - 2.11 This permit does not convey any property rights of any sort, or any exclusive privilege.
 - 2.12 Prior to any transfer of ownership of the source, the permittee shall provide a copy of this permit to the new owner(s). In the event of any change in ownership of the source, the permittee must notify the EPA as soon as possible but in no case later than 30 days after the change in ownership is effective. This notification to the EPA must specify the date on which ownership was transferred, identify the previous owner, and update the name, street address, mailing address, contact information, and any other information about the ownership and/or operation of the source that will change as a result of the change in ownership. The permittee shall ensure that the source remains in compliance with this permit during any such transfer of ownership.

- 2.13 Upon presentation of proper credentials, the permittee must allow a representative of EPA to:
- 2.13.1 Enter upon the premises where the source is located or emissions-related activity is conducted or where records are required to be kept under the conditions of the permit;
 - 2.13.2 Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
 - 2.13.3 Inspect, during normal business hours or while the source is in operation, any facilities, equipment (including monitoring and air pollution control equipment), practices or operations regulated or required under the permit;
 - 2.13.4 Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and
 - 2.13.5 Record any inspection by use of written, electronic, magnetic and photographic media.
- 2.14 The permittee shall furnish the EPA, within a reasonable time, any information the EPA requests in writing to determine whether cause exists to modify, revoke and reissue, or terminate the permit or to determine compliance with the permit. Upon request, the permittee shall furnish the EPA with copies of records required to be kept by the permit. For any such information claimed to be confidential, the permittee must also submit a claim of confidentiality in accordance with 40 CFR Part 2, Subpart B.
- 2.15 Any document required to be submitted under this permit shall be certified by a responsible official, as that term is defined in 40 CFR 71.2, of the permittee as to truth, accuracy, and completeness. Such certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- 2.16 The permittee shall notify the EPA:
- 2.16.1 Of the date construction commences, as defined in 40 CFR 52.21(b)(9), within 30 days after the event;
 - 2.16.2 If construction is discontinued for a period of 18 months or more, within 30 days after the period;
 - 2.16.3 Of the date construction is completed, within 30 days after the event; and
 - 2.16.4 Of the actual date of initial startup, as defined in 40 CFR 60.2, within 15 days after the event.
- 2.17 Unless otherwise specified in this permit, any documents required to be submitted under this permit, including reports, test data, monitoring data and notifications shall be submitted to the EPA address below:

Clean Air Act Compliance Manager
U.S. EPA – Region 10 (OCE-201)
1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3123

