

Statement of Basis for Revision to AOP-1 (Renewal #2) for Inland Empire Paper Company

Spokane Regional Clean Air Agency (SRCAA) issued AOP-1 (Renewal #2) to Inland Empire Paper Company (IEPC) on October 1, 2007. Since the permit was issued, some new requirements (i.e., Notice of Construction (NOC) approval order #1463, issued by SRCAA on August 13, 2009 and NOC #1169, as revised by SRCAA on July 9, 2008) have become applicable to the facility. According to WAC 173-401-730, when additional requirements become applicable to a source with a remaining permit term of three or more years, the permit must be reopened and revised to include the additional requirements. Since AOP-1 does not expire until September 30, 2012 (which is more than three years after the additional requirements became effective), the AOP must be reopened to incorporate the new requirements. According to WAC 173-401-730, the permit revision must be completed no later than 18 months after promulgation of the applicable requirement.

The procedures for reopening a permit are established in WAC 173-401-730. Generally speaking, the procedure is the same as for issuing a permit (30-day public comment and 45-day EPA review) except that the portions of the permit being revised are the only ones open for comment, and IEPC must be notified at least 30-days prior to the reopening. In this case, IEPC was notified of the intended reopening by letter, dated October 19, 2009.

As part of this reopening, the following new and/or revised requirements have been incorporated:

- Requirements contained in SRCAA Notice of Construction (NOC) #1169, as revised on July 9, 2008; and
- Requirements contained in NOC #1463, issued for the #5 thermo-mechanical pulping line with a heat recovery system, on August 13, 2009.

This document is intended to provide the statement of basis for the revisions that are being made to AOP-1, Renewal #2 (i.e., the requirements are listed, the regulatory basis for each new and revised requirement is provided, and associated monitoring, recordkeeping, and reporting is discussed).

PROPOSED REVISIONS TO AOP-1

The following revisions are included under this permit reopening:

1. The cover page and header of the permit were revised to include a revision date. The expiration date of the permit will remain the same.
2. SRCAA's address was updated in the permit to reflect the new location.
3. The asbestos requirements, given in Condition 43, were updated to include the most recently adopted local and state regulations.

4. Portions of Condition 7M pertaining to the addition of reagent to the sludge burned in the Fluidized Bed Combustor were removed from the AOP because these requirements were removed from NOC #1169 during the most recent NOC revision (dated July 9, 2008). The reason that the reagent requirements were removed from NOC #1169 is because IEPC conducted testing to show that they could meet the required SO2 emission limit for the FBC without the addition of reagent. See the NOC #1169 Revision #4 file for more information.
5. Conditions 95-102 were added to Section **II.C Pulp Mill Emission Limitations**. These requirements apply to the #5 thermo-mechanical pulping line with a heat recovery system and are given in NOC #1463.
6. Conditions 19M-22M were added Section **II.F Monitoring, Recordkeeping, & Reporting Requirements**. These requirements are given in NOC #1463 and serve as the monitoring, recordkeeping, and reporting requirements (MRRR) for Conditions 95-102.
7. A portion of the conditions in the revised AOP-1 were re-numbered to account for the conditions that were added and removed.

PREPARED BY: _____
 April L. Westby

DATE: _____

This Statement of Basis and the Operating Permit to which it applies have been reviewed by:

_____, P.E.
 April Westby, P.E.

DATE: _____

 Ronald J. Edgar, Chief of Technical Services

DATE: _____

 William Dameworth, Control Officer

DATE: _____