air contaminant discharge permit

review report

Department of Environmental Quality

International Paper Company

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**Source Information:**

|  |  |
| --- | --- |
| SIC | 2653/4961 |
| NAICS | 322211/221330 |

|  |  |
| --- | --- |
| Source Categories (Table 1 Part, code) | Part B, #75 |
| Public Notice Category | II |

**Compliance and Emissions Monitoring Requirements:**

|  |  |
| --- | --- |
| FCE |  |
| Compliance schedule |  |
| Unassigned emissions |  |
| Emission credits |  |
| Special Conditions |  |

|  |  |
| --- | --- |
| Source test [date(s)] |  |
| COMS |  |
| CEMS |  |
| Ambient monitoring |  |

**Reporting Requirements**

|  |  |
| --- | --- |
| Annual report (due date) | February 15 |
| Quarterly report (due dates) |  |

|  |  |
| --- | --- |
| Monthly report (due dates) |  |
| Excess emissions report |  |
| Other (specify) |  |

**Air Programs**

|  |  |
| --- | --- |
| Synthetic Minor (SM) |  |
| SM -80 |  |
| NSPS (list subparts) | Subpart Dc |
| NESHAP (list subparts) | Subpart KK |
| Part 68 Risk Management |  |
| CFC |  |
| NSR |  |
| PSD |  |
| RACT |  |
| TACT | X |

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PERMITTING

PERMITTING ACTION

# The permit is a renewal for an existing Air Contaminant Discharge Permit (ACDP) which was issued on 5/20/2004 and was originally scheduled to expire on 3/1/2009.

OTHER PERMITS

# Other permits issued or required by the Department of Environmental Quality for this source include a general storm water permit, 1200 COLS.

ATTAINMENT STATUS

# The source is located in a maintenance area for CO and Ozone. Ozone precursors NOX and VOC are regulated pollutants. This source is an insignificant source of CO, NOX, and VOC. The area is in attainment for all other pollutants.

source description

overview

# The permittee manufactures shipping boxes. Three sheets of paper are used to make “containerboard”. The outside sheets are heated by steam vents to make them pliable, and then joined to an inner corrugated sheet using a starch-based glue to make a paper “sandwich”. The formed sheet passes over heated plates to gel the starch, trimmed, then sent to the finishing area to be formed into boxes. The sheet is cut to specified size, printed, slotted and folded, bottom flap sealed, then packaged for shipment. Approximately 23% of the containerboard is printed; about 5% of the sheets are laminated before finishing, using cold set adhesive; and about 3% of the containerboard is waxed.

Scrap paper is pneumatically collected, fed through one of two cyclones, and transferred to a baler. The baled scrap is sent to a paper mill for recycling. PM from a bulk starch silo is negligible and is not considered in the permit.

Steam for the process is provided by a 600 HP natural gas fired boiler, with diesel back-up. The facility also has four natural gas fired heaters which are not considered in the permit. The facility was built in 1980.

# A two-color rotary die cutter was added to the facility in March 2001.

process and control devices

# Existing air contaminant sources at the facility consist of the following:

## One corrugator, installed 1980;

## Two in-line cyclones on the scrap collection system, installed 1980 and 1989;

## Printing/finishing station, installed 1980;

## One Cleaver Brooks boiler, 25 MM Btu/hr, with diesel back-up, installed in 1980.

compliance

# The facility was inspected on 2/10/2004 and found to be in compliance with permit conditions.

# During the prior permit period there were no complaints recorded for this facility

# No enforcement actions have been taken against this source since the last permit renewal.

emissions

# Proposed PSEL information:

|  |  |  |  |
| --- | --- | --- | --- |
| Pollutant | Baseline Emission Rate (tons/yr) | Netting Basis | Plant Site Emission Limits (PSEL) |
| Previous (tons/yr) | Proposed (tons/yr) | Previous PSEL (tons/yr) | Proposed PSEL (tons/yr) | PSEL Increase (tons/yr) |
| PM | 0 | 0 | 0 | 24 | 24 | 0 |
| PM10 | 0 | 0 | 0 | 14 | 14 | 0 |
| SO2 | 0 | 0 | 0 | 39 | 39 | 0 |
| NOx | 0 | 0 | 0 | 39 | 39 | 0 |
| CO | 0 | 0 | 0 | 99 | 99 | 0 |
| VOC | 0 | 0 | 0 | 39 | 39 | 0 |
| Single HAP | 0 | 0 | 0 | 9 | 9 | 0 |
| Combined HAPS | 0 | 0 | 0 | 24 | 24 | 0 |

## The proposed PSELs for all pollutants are equal to the Generic PSEL in accordance with OAR 340-216-0064(4)(b) and the netting basis is zero in accordance with OAR 340-222-0040(2).

## Anticipated emissions are the same as the previous PSEL and are based on the manufacture of 1.6 billion feet of containerboard per year and the use of 342,000 pounds of ink with an average VOC content of 5%, by weight, and an average 3% product that has been waxed (included in the corrugated emission factor).

## Although the facility does not have PTE for HAP, the permittee has specifically requested a limit on single and combined HAP be included in the permit.

## The PSEL is a federally enforceable limit on the potential to emit.

significant emission rate analysis

# For each pollutant, the proposed Plant Site Emission Limit is less than the Netting Basis plus the significant emission rate, thus no further air quality analysis is required.

major source applicability

criteria pollutants

# A major source is a facility that has the potential to emit 100 tons/yr or more per year of any criteria pollutant. This facility is not a major source of criteria pollutant emissions. Calculation of anticipated emissions was based on the facility’s maximum potential production, thus represents potential to emit.

Hazardous air pollutants

# A major source is a facility that has the potential to emit 10 tons/yr or more of any single HAP or 25 tons/yr or more of combined HAPs. This source is not a major source of hazardous air pollutants. Glycol ethers from the use of inks and formaldehyde from starch additives total less than two tons/yr.

additional requirements

nsps applicability

# 40 CFR Part 60, Subpart Dc, is not applicable to the facility because the boiler was installed prior to promulgation of the rule.

neshaps/mact applicability

# 40 CFR Part 63, Subpart KK applies to major sources in the printing and publishing industry. This facility is a minor source, and is therefore not subject to the MACT standards.

RACT applicability

# The facility is located in the Portland AQMA, but it is not one of the listed source categories in OAR 340-232-0010, thus the RACT rules do not apply

tact applicability

# The source is meeting the State’s TACT/Highest and Best Rules by pneumatically collecting containerboard scraps to decrease PM emissions. Highest and Best practices are achieved by routine maintenance and tuning on the boiler.

source testing

prior testing results

# The results of the most recent source tests are listed below:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Emission Device | Test Date | Production Rate | Pollutant | Measured Value |
| Corrugator | 10/25/1994 | 204,000 ft2/hr | VOC | 0.0082 lb VOC/1000 ft2 |
| Scrap cyclones | 10/25/1994 | 1,341 lb/bale | PM | * 1. lb PM/ton of scrap
 |

## The value given for the corrugators is a weighted average, including 3% waxed product.

## The value given for the cyclones is an average. Cyclone 2 feeds into cyclone 1.

public notice

# Pursuant to OAR 340-216-0064(5)(a), issuance of Simple Air Contaminant Discharge Permits require public notice in accordance with OAR 340-209-0030(3)(b), which requires that the Department provide notice of the proposed permit action and a minimum of 30 days for interested persons to submit written comments. **The public notice was mailed on March 13, 2009, the comment period ended at 5pm, on April 14, 2009. No coments were received.**

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