United States Environmental Protection Agency
Region 10, Office of Air, Waste and Toxics
AWT-107
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101

Permit Number: R10NT500701
Replaces: R10NT500700
Issued: March 5, 2009
AFS Plant I.D. Number: 16-049-00007

Non - Title V Air Quality Operating Permit
Revision #1

This permit is issued in accordance with the provisions of 40 CFR § 49.139 and applicable rules and regulations, to

Clearwater Forest Industries, Inc.

for operations in accordance with the conditions listed in this permit, at the following location:

Nez Perce Reservation
One mile south of Kooskia on Hwy 13
Latitude: 46.12 N Longitude: 115.98 W

Facility Contact: Jim Dumars
P.O. Box 340
Kooskia, Idaho 83539-4266
Phone: 208-926-4266, Fax: 208-926-4269
Email: jd_clearwaterforest@msn.com

A technical support document that describes the bases for conditions contained in this permit is also available.

/s/ March 5, 2009

Richard Albright, Director
Office of Air, Waste and Toxics
U.S. EPA, Region 10

Date

Table of Contents

1. General Conditions

1.1. The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Air Act.

1.2. Compliance with the terms of this permit does not relieve or exempt the permittee from compliance with other applicable Clean Air Act requirements or other applicable federal, tribal, state or local laws or regulations.

2. Emission Limits and Work Practice Requirements

2.1. HAP emissions from this facility shall not exceed 24 tons per year as determined on a rolling 12-month basis by calculating the emissions (tons) for each month and adding the emissions (tons) for the previous eleven months. Monthly HAP emissions (tons) shall be determined by multiplying appropriate emission factors (lb/unit) by the recorded monthly operation/production rates (units/month) and dividing by 2000 lb/ton.

2.1.1. Hydrogen chloride emission factors shall be based on the most recent fuel sampling results. Prior to the first fuel analyses being conducted, the permittee shall use the hydrogen chloride emission factors in Section 4.3.3 of the technical support document.

2.2. Emissions of any single HAP from this facility shall not exceed 9 tons per year as determined on a rolling 12-month basis by calculating the emissions (tons) for each month and adding the emissions (tons) for the previous eleven months. Monthly emissions of any single HAP (tons) shall be determined by multiplying appropriate emission factors (lb/unit) by the recorded monthly operation/production rates (units/month) and dividing by 2000 lb/ton.

2.2.1. Hydrogen chloride emission factors shall be based on the most recent fuel sampling results. Prior to the first fuel analyses being conducted, the permittee shall use the hydrogen chloride emission factors in Section 4.3.3 of the technical support document.

3. Monitoring and Recordkeeping Requirements

3.1. Each month, the permittee shall calculate and record facility-wide monthly and rolling 12-month total emissions (tons) for all HAP-emitting activities at the facility.

3.1.1. The permittee shall track and record the operations and production for each HAP-emitting activity at the facility, such that facility-wide HAP emissions can be calculated on a monthly and 12-month basis.

3.2. Each calendar quarter, the permittee shall sample and analyze the wood fuel and develop a hydrogen chloride (HCl) emission factor.

3.2.1. The HCl emission factor (lb/MMBtu) for the boiler shall be determined using the procedure specified in Appendix A to this permit or an alternative procedure approved in writing by EPA.

3.2.2. The frequency for sampling and analyzing the wood fuel and developing an HCl emission factor shall be adjusted as follows based on the monthly calculated rolling 12-month total actual emissions required by Condition 3.1:

If rolling 12-month actual emissions are…	Then repeat the sampling and analysis...
≥ 5 tons per year of HCl **or** ≥ 12.5 tons per year of HAP	Each calendar quarter
< 5 tons per year of HCl **and** < 12.5 tons per year HAP	Each calendar year

3.3. The permittee shall maintain records of emission calculations and parameters used to calculate emissions for at least five years.

4. Reporting Requirements

4.1. Once each year, on or before November 1, the permittee shall, along with the annual registration required by 40 CFR § 49.138(e)(2), submit to EPA a report containing the twelve monthly rolling 12-month emissions calculations for the previous calendar year.

4.2. The report required under Condition 4.1 shall contain a description of all emissions estimating methods used, including emission factors and their sources, assumptions made and production data.

Appendix A

Non-Title V Operating Permit
R10NT500701

Hydrogen Chloride Emission Factor Procedure for Hogged Fuel

Clearwater Forest Industries, Inc
Kooskia, Idaho

Appendix A: HCl Emission Factor Procedure for Hogged Fuel

Procedure Last Revised 12/02/2008

1. Sample Fuel
   - Take 3 composite samples (composed of three approximately 2-pound individual samples) using 40 CFR 63.7521(c); all samples shall be collected at a location that most accurately represents the fuel being burned; if not sampling during a stack test, individual belt or screw feeder samples, described in 40 CFR 63.7521(c)(1)(ii), shall be separated by a 30 minute period

2. Homogenize Sample
   - Subdivide and homogenize each composite sample using 40 CFR 63.7521(d) until sample passes 0.5 mm screen; approximately 50 grams of sample are needed for each moisture analysis, 1 gram of sample is needed for each oxygen bomb, and 2 grams of sample are needed for ash analysis

3. Determine Moisture Content
   - Determine moisture content (%, wet basis) of three composite samples using ASTM E871-82R06; time analysis such that samples used for moisture analysis represents moisture content of samples introduced to oxygen bomb; do not average the three sample results

4. Prepare Sample for Heat Content and Chlorine Content Analysis
   - Prepare three composite samples using SW-846-5050; this sample preparation can be performed simultaneously with heat content analysis (ASTM E711); alternatively, ASTM E776-87R04 can be used in place of both SW-846-5050 and SW-846-9056/9056A; do not combine composite samples before or after sample preparation

5. Determine Heat Content (aka Gross Calorific Value or High Heat Value)
   - Determine gross calorific value (Btu/lb, wet basis) of three composite samples using ASTM E711-87R04; do not average the three sample results
   - Convert GCV results to be on a dry basis:
     (GCV, wet basis) / (1 - %moisture) = (GCV, dry basis)

6. Determine Chlorine Content
   - Analyze bomb combustate for each composite sample for Cl (mg/L, wet basis) using SW-846-9056 or SW-846-9056A (alternatively, use ASTM E776-87R04 in place of SW-846-5050 and SW-846-9056/9056A)
   - Convert Cl mg/L (wet basis) to Cl ug/g (wet basis) using SW-846-5050 (eq. 1)

7. Determine Average HCl Emission Factor
   - Convert Cl (ug/g, wet basis) to HCl (lb/mmBtu, dry basis) for each composite sample:
     (Cl ug/g, wet basis) / (1 -%moisture) x (36.5 g HCl / 35.5 g Cl) / ($1x10^6$ ug/g) / (GCV Btu/lb, dry basis) x ($1x10^6$ Btu/mmBtu) = (HCl lb/mmBtu)
   - Determine HCl emission factor (HCl lb/mmBtu) by averaging the HCl results from the three composite samples

United States Environmental Protection Agency
Region 10, Office of Air, Waste and Toxics
AWT-107
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101

Permit Number: R10T500701
Replaces: R10T500700
Issued: March 5, 2009
AFS Plant I.D. Number: 16-049-00007

Technical Support Document
Non-Title V Air Quality Operating Permit
Revision #1

Permit Writer: Doug Hardesty

Clearwater Forest Industries, Inc.
Nez Perce Reservation
Kooskia, Idaho

Purpose of Owner-Requested Non-Title V Operating Permit and Technical Support Document

Title 40 Code of Federal Regulations Section 49.139 establishes a permitting program to provide for the establishment of Federally-enforceable requirements for air pollution sources located within Indian reservations in Idaho, Oregon and Washington. The owner or operator of an air pollution source who wishes to obtain a Federally-enforceable limitation on the source's actual emissions or potential to emit must submit an application to the Regional Administrator requesting such limitation.

The United States Environmental Protection Agency (EPA) then develops the permit via a public process. The permit remains in effect until it is modified, revoked or terminated by EPA in writing.

This document, the Technical Support Document, fulfils the requirement of 40 CFR § 49.139(c)(3) by describing the proposed limitation and its effect on the actual emissions and/or potential to emit of the air pollution source. Unlike the air quality operating permit, this document is not legally enforceable. The permittee is obligated to follow the terms of the permit. Any errors or omissions in the summaries provided here do not excuse the permittee from the requirements of the permit. Permit changes made in Revision #1 are explained in Addendum A to this Technical Support Document

Table of Contents

1. EPA Authority to Issue Non-Title V Permits

On April 8, 2005 EPA adopted regulations (70 FR 18074) codified at 40 CFR Parts 9 and 49, establishing Federal Implementation Plans (FIPs) under the Clean Air Act for Indian reservations in Idaho, Oregon and Washington. The FIPs, commonly referred to as the Federal Air Rules for Reservations (FARR), put in place basic air quality regulations to protect health and welfare on Indian reservations located in the Pacific Northwest. 40 CFR § 49.139 creates a permitting program for establishing Federally-enforceable requirements for air pollution sources on Indian reservations. This permit has been developed pursuant to 40 CFR § 49.139.

2. Facility Information

The Clearwater Forest Industries, Inc. facility is located near Kooskia, Idaho. Facility contact information can be found on the first page of the permit. The facility is within the outer boundaries of the Nez Perce Reservation.

Tribal Contact: Julie Simpson
Air Quality Project Coordinator
Environmental Restoration & Waste Management Program
Nez Perce Tribe
P.O. Box 365
109 Lolo Street
Lapwai, ID 83540
208-843-9381, ext. 2401
Fax: 208-843-7411

3. Project Description

3.1 Background

In the second quarter of 2007, EPA Region 10 permit staff learned of new information on hazardous air pollutants (HAP) emissions from lumber drying kilns. Permit staff attended a technical meeting in Corvallis, OR, where the principal investigator, Dr. Mike Milota of Oregon State University, shared the results of his testing of various wood species. The results of these tests indicated that emissions of HAPs from lumber drying are significantly higher than previously thought. As a result, Region 10 believed that a number of sawmill facilities previously thought to be minor might in fact be major sources of HAP. Major sources of HAP are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) in 40 CFR Part 63. These standards are also referred to as Maximum Achievable Control Technology (MACT). Major HAP source sawmills with lumber kilns are potentially subject to the requirements of two MACTs:

1. 40 CFR, Part 63, Subpart DDDD –– National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products; and
2. 40 CFR, Part 63, Subpart DDDDD –- National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.

On July 30, 2007 the United States Court of Appeals for District of Columbia Circuit vacated Subpart DDDDD in its entirety. As a result, sources that would have been subject to this MACT must comply

with the case-by-case MACT requirements of section 112(j) of the Clean Air Act. The details of exactly how this will be implemented have not yet been finalized, and EPA headquarters is expected to issue guidance that can be implemented consistently across the country. Major HAP source sawmills with lumber kilns would have to comply with the requirements of 112(j).

This situation is even more complex in the case of Subpart DDDD. The United States Court of Appeals for District of Columbia Circuit issued their opinion for a partial vacatur and remand of this MACT. The partial vacatur involved changing the effective date of the regulation from October 1, 2008 to October 1, 2007. This ties in with EPA's once-in-always-in policy whereby a source that is major at the effective date of a MACT cannot subsequently assume enforceable limits to not be subject to that MACT.

Region 10 recognized that (partially as a result of the latest kiln emissions data) many sawmills would be considered a major HAP source based on their potential to emit (PTE) HAPs, but their actual emissions would be much lower because their actual throughputs and/or species dried were less than worst case. Theses types of facilities were good candidates to assume a synthetic minor limit to ensure that their PTE remained below major source thresholds and which could use monitoring, recordkeeping and reporting to assure that their actual emissions remain below the new emission limits.

Rather than select facilities based on preliminary calculations of HAP emissions PTE, EPA elected to notify all of the sawmills known to be in Region 10 Indian Country. On August 8, 2007, EPA sent letters to all 10 sawmills to apprise them these recent events and of a streamlined process to obtain permits with the necessary HAP emission limits. If a facility wanted to take advantage of this streamlined permit opportunity, utilizing the FARR non-Title V operating permit program, EPA requested completed applications no later than August 15, 2007.

3.2 HAP Limit Request

On August 15, 2007, EPA received an application from the applicant in response to the letter described in Section 3.1. In the application, the applicant requested emission limits of 9 tons per year of any single hazardous pollutant (HAP) and 24 tons per year of all HAPs. The emission limits would apply to all HAP-emitting activities at the facility.

The applicant requested the HAP limits in order to avoid being considered a major source of HAP emissions.

4. Regulatory Analysis and Permit Content

4.1 Evaluation of HAP Limit Request

A source is considered a major source of HAPs if the facility's potential to emit is 10 tons per year (tpy) or more of a single HAP, or 25 tpy or more of all HAPs in aggregate. The applicant has requested emission limits that will ensure that the facility would be considered a minor source of HAPs. Because of rounding, this translates to emission limits of 9 tpy (single HAP) and 24 tpy (total HAPs).

MACT-avoidance limits require compliance assurance on a rolling 12-month basis. The monitoring, recordkeeping and reporting for this permit will require the estimation of emissions from all HAP-emitting activities at least once a month. Details on the compliance assurance requirements are discussed in Section 4.3.

4.2 Other Federal Regulations

Endangered Species Act (ESA) Impacts - EPA is obligated to consider the impact that a federal project may have on listed species or critical habitats. Based on the fact that the permit contains a voluntarily-requested emission limit, it is EPA's conclusion that the issuance of this permit will not affect a listed specie or critical habitat. Therefore, no additional requirements will be added to this permit for ESA reasons. EPA's no effect determination concludes EPA's obligations under Section 7 of the ESA. (See Endangered Species Consultation Handbook: Procedures for Conducting Consultation and Conference Activities Under Section 7 of the Endangered Species Act, FWS and NMFS, March 1998, at Figure 1).

National Environmental Policy Act (NEPA) Review - Under Section 793(c) of the Energy Supply and Environmental Coordination Act of 1974, no action taken under the Clean Air Act shall be deemed a major Federal action significantly affecting the quality of the human environment within the meaning of the National Environmental Policy Act of 1969. This permit is an action taken under regulations implementing the Clean Air Act and is therefore exempt from NEPA.

National Historic Preservation Act (NHPA) – This project involves establishing a limit on emissions. No part of the facility will be physically altered directly as a result of this permit. Consequently, no adverse effects are expected, and further review under NHPA is not indicated.

4.3 Permit Content

The permit includes the requested emission limits as well as monitoring, recordkeeping and reporting requirements necessary to assure compliance with each limit. Each section of the permit is discussed below. The permit is organized into four sections as follow:

4.3.1 Permit Section 1: General Conditions

This section of the permit contains conditions of a general nature that apply to the facility. Permit Condition 1.1 requires the permittee to comply with the conditions in the permit.

This permit establishes owner-requested limits and related compliance assurance provisions to restrict the facility's potential to emit HAPs. It does not contain other Clean Air Act requirements to which this facility is or may be subject, such as the FARR; New Source Performance Standards, 40 CFR Part 60, National Emissions Standards for Hazardous Air Pollutants, 40 CFR Part 61 and 63; and the Title V operating permit program, 40 CFR Part 71. As specified in Permit Condition 1.2, compliance with the terms of this permit in no way relieves or exempts the permittee from compliance with other applicable Clean Air Act requirements or of any other applicable federal, tribal, state, or local law or regulation.

4.3.2 Permit Section 2: Emission Limits and Work Practice Requirements

This section of the permit contains any emissions limits or work practice requirements that have been established as a result of the subject permit action. As discussed earlier, in Section 4.1, for this permit action, the only limits established are the 9 tpy single HAP limit and the 24 tpy total HAP limit.

4.3.3 Permit Section 3: Monitoring and Recordkeeping Requirements

Permit Condition 3.1 requires the permittee to calculate monthly emissions every month. The rolling 12-month emissions must be determined by adding the emissions calculated for the most recent month with the emissions for the immediately preceding 11 months. Emissions are to be calculated from the entire

facility. The following tables provide the emission factors that EPA currently accepts for estimating emissions from wood waste-fired boilers and from lumber kilns.

Table 1: Wood Waste-Fired Boiler Emission Factors

Compound	Emission Factor[1] (lb/MMBtu)		Compound	Emission Factor[1] (lb/MMBtu)
Acetaldehyde	8.30E-04		**Tetrachloroethene**	3.80E-05
Acetophenone	3.20E-09		**1,1,1-Trichloroethane (methyl chloroform)**	3.10E-05
Acrolein	4.00E-03		**Trichloroethene**	3.00E-05
Benzene	4.20E-03		**Toluene**	9.20E-04
bis(2-Ethylhexyl) phthalate (DEHP)	4.70E-08		**2,4,6-Trichlorophenol**	2.20E-08
Bromomethane (methyl bromide)	1.50E-05		**Vinyl Chloride**	1.80E-05
Carbon tetrachloride	4.50E-05		**o-Xylene**	2.50E-05
Chlorine	7.90E-04		**POM**	
Chlorobenzene	3.30E-05		Benzo(a)anthracene	6.50E-08
Chloroform	2.80E-05		Benzo(a)pyrene	2.60E-06
Chloromethane (methyl chloride)	2.30E-05		Benzo(b)fluoranthene	1.00E-07
Dibenzo furans			Chrysene	3.80E-08
Heptachlorodibenzo-p-furans	2.40E-10		Benzo(k)fluoranthene	3.60E-08
Hexachlorodibenzo-p-furans	2.80E-10		Dibenzo(a,h)anthracene	9.10E-09
Octachlorodibenzo-p-furans	8.80E-11		Indeno(1,2,3,c,d)pyrene	8.70E-08
Pentachlorodibenzo-p-furans	4.20E-10		Acenaphthene	9.10E-07
2,3,7,8-Tetrachlorodibenzo-p-furans	9.00E-11		Fluorene	3.40E-06
Tetrachlorodibenzo-p-furans	7.50E-10		Anthracene	3.00E-06
1,2-Dichloroethane (ethylene dichloride)	2.90E-05		Phenanthrene	7.00E-06
Dichloromethane (methylene chloride)	2.90E-04		Fluoranthene	1.60E-06
1,2-Dichloropropane (propylene dichloride)	3.30E-05		Pyrene	3.70E-06
2,4-Dinitrophenol	1.80E-07		Perylene	5.20E-10
Ethylbenzene	3.10E-05		Benzo(g,h,i)perylene	9.30E-08
Formaldehyde	4.40E-03		Acenaphthylene	5.00E-06
Hydrogen chloride	1.90E-02		Benzo(e)pyrene	2.60E-09
Naphthalene	9.70E-05		2-Methylnaphthalene	1.60E-07
Pentachlorophenol	5.10E-08		Benzo(j,k)fluoranthene	1.60E-07
4-Nitrophenol	1.10E-07		2-Chloronaphthalene	2.40E-09
Phenol	5.10E-05		**Antimony**	7.90E-06
Polychlorinated biphenyls			**Arsenic**	2.20E-05
Decachlorobiphenyl	2.70E-10		**Beryllium**	1.10E-06
Dichlorobiphenyl	7.40E-10		**Cadmium**	4.10E-06
Heptachlorobiphenyl	6.60E-11		**Chromium (Total)**	2.10E-05
Hexachlorobiphenyl	5.50E-10		**Chromium (VI)**	3.50E-06
Pentachlorobiphenyl	1.20E-09		**Cobalt**	6.50E-06
Trichlorobiphenyl	2.60E-09		**Lead**	4.80E-05
Tetrachlorobiphenyl	2.50E-09		**Manganese**	1.60E-03
Propionaldehyde	6.10E-05		**Mercury**	3.50E-06
Styrene	1.90E-03		**Nickel**	3.30E-05
2,3,7,8-Tetrachlorodibenzo-p-dioxins	8.60E-12		**Selenium**	2.80E-06

[1] AP-42 September 2003, Tables 1.6-3 and 1.6-4

Table 2: Kiln Emission Factors

Species	Max Kiln Temp ˚F	Total HAP lb/MMBF	Methanol Lb/MMBF	Formaldehyde lb/MMBF	Acetaldehyde lb/MMBF	Propionaldehyde lb/MMBF	Acrolein lb/MMBF
Hemlock	≤200˚F	199	82	1.24	113	1	1.6
Hemlock	>200˚F	305	186	3.8	113(1)	1(1)	1.6(1)
Douglas Fir	≤200˚F	97	38	1	57	0.55	0.65
Douglas Fir	>200˚F	116	57	1(1)	57(1)	0.55(1)	0.65(1)
White Fir	≤200˚F	240	122	2.8	113(2)	1(1)(2)	1.6(1)(2)
White Fir	>200˚F	301	183	2.8(1)	113(1)(2)	1(1)(2)	1.6(1)(2)
Ponderosa Pine(3)	≤200˚F	184	65	2.9	113(1)(2)	1(1)(2)	1.6(1)(2)
Lodgepole Pine(3)	≤200˚F	73.6	55	4	12	1(1)(2)	1.6(1)(2)
Lodgepole Pine(3)	>200˚F	78.6	60	4(6)	12(6)	1(1)(2)	1.6(1)(2)
Slash Pine	>200˚F	215	164	4(5)	44.7	1(1)(2)	1.6(1)(2)

(1) Assumes emissions of this HAP not temperature dependent. There is insufficient data to know for sure.

(2) Assumes emissions are the same as hemlock.

(3) Pine is not normally dried at temperatures > 200 ^{o}F.

(4) No data for Slash Pine dried ≤ 200 ^{o}F.

(5) Assume to be the same as for Lodgepole Pine.

(6) Assumes emissions the same as for Lodgepole Pine dried at ≤ 200 ^{o}F.

It is EPA's expectation that the permittee will use the emission factors in Tables 1 and 2 when estimating emissions from wood waste-fired boilers and from lumber kilns unless the permittee has other information showing why another technique more accurately represents its emissions. The permittee is also expected to calculate emissions from other HAP-emitting activities by using emission estimation methods that are verifiable using currently accepted engineering criteria.

Because chloride content in wood waste can vary from location to location, the facility is required (see Conditions 3.2 and 3.3) to test their wood waste fuel for chloride content and to base their facility-wide HAP emission calculations on the latest test results. Larger facilities (e.g. with a capacity > 60 MMbf/year) are required to test their fuel quarterly, while smaller facilities are required to conduct this testing on an annual basis.

The permittee is required (Condition 3.4) to maintain copies of required emissions calculations and all supporting documentation for a period of five years.

4.3.4 Permit Section 4: Reporting Requirements

Condition 4.1 requires the permittee to annually submit to EPA a record of the 12 monthly 12-month emissions calculations. For ease in coordinating submittals, this report is required to be submitted concurrently with the annual FARR registration submittal. As specified in 40 CFR § 49.139(f), the annual FARR registration submittal must be submitted with the annual emission report and fee calculation required by 40 CFR Part 71.

This annual report must include details (see Condition 4.2) on how the emissions were calculated as well as identifying the sources for various data elements.

5. Permit Procedures

5.1 Permit Revision, Termination and Reissuance

The permittee may request EPA to revise the conditions of this permit by submitting an application that contains the information specified in 40 C.F.R. 49.139(d). EPA will revise the permit using the same procedures that apply to initial permit issuance.

If the permittee wishes to terminate the permit, a written request must be submitted to EPA explaining the reasons for the request and, if necessary for continued operation, submitting applications for any Clean Air Act permits or approvals that the permittee avoided by establishment of the limits contained in this permit.

This permit may be terminated, revised, or revoked and reissued by EPA for cause. Cause exists to terminate, revise, or revoke and reissue this permit under the following circumstances:

1. This permit contains a material mistake;
2. Inaccurate statements were made in establishing the terms or conditions of this permit;
3. The permittee fails to comply with any condition of this permit; or
4. This permit must be terminated, revised, or reopened and reissued to assure compliance with Clean Air Act requirements.

EPA will use the same proceedings to terminate, revise, or revoke and reissue a permit for cause as for initial permit issuance. Before initiating proceedings to terminate, revise, or revoke and reissue a permit, EPA will provide the permittee at least 30 days' advance written notice of EPA's intent to terminate, revise, or revoke and reissue the permit, except that EPA may provide a shorter notice period in the case of an emergency.

5.2 Public Notice and Comment

As required under 40 CFR § 49.139(c), all draft owner-requested operating permits must be publicly noticed and made available for public comment. For this permit action, the requirements of 40 CFR § 49.139(c)(5) are as follow:

1. Make available for public inspection, in at least one location in the area affected by the air pollution source, a copy of the draft operating permit prepared by EPA, the technical support document for the draft permit, the application, and all supporting materials (see 40 CFR 49.139(c)(5)(i));
2. Publish public notice for this draft permit, by prominent advertisement in a newspaper of general circulation in the area affected by this source, of the availability of the draft permit to operate and supporting materials and of the opportunity to comment. Where possible, notices will also be made in the Tribal newspaper (see 40 CFR 49.139(c)(5)(ii));
3. Provide copies of the notice to the owner or operator of the air pollution source, the Tribal governing body, and the Tribal, State and local air pollution authorities having jurisdiction in areas outside of the Indian reservation potentially impacted by the air pollution source (see 40 CFR 49.139(c)(5)(iii)); and
4. Provide for a 30-day period for submittal of public comments, starting upon the date of publication of the notice. If requested, the Regional Administrator may hold a public hearing

and/or extend the public comment period for up to an additional 30 days (see 40 CFR 49.139(c)(5)(iv)).

40 CFR § 49.139(c) also contains requirements that apply after the draft permit is made available for public comment. These additional requirements must be satisfied prior to issuance of the final permit:

1. EPA will accept comments on the draft permit, during the 30 day public comment period (see 40 CFR 49.139(c)(5)(iv));
2. After the close of the public comment period, EPA will consider all comments received and prepare a final permit to operate and final technical support document. The final technical support document will include a response to all comments received during the public comment period (see 40 CFR 49.139(c)(6));

After issuance of the final permit and technical support document, the following requirements must also be satisfied:

1. Make the final permit and technical support document available at all of the locations where the draft permit was made available (see 40 CFR 49.139(c)(7)); and
2. Send the final permit and technical support document to all persons who provided comments on the draft permit to operate (see 40 CFR 49.139(c)(7)).

5.3 Response to Public Comments

The draft permit and technical support document were made available during a public comment period that lasted from August 22, 2007 to September 22, 2007. No comments were received during this time.

6. Abbreviations and Acronyms

CFR	Code of Federal Regulations
EPA	United States Environmental Protection Agency (also U.S. EPA)
FARR	Federal Air Rules for Reservations
FR	Federal Register
HAP	Hazardous air pollutant
NESHAP	National Emission Standards for Hazardous Air Pollutants (Title 40 CFR Parts 61 and 63)
PTE	Potential to emit
tpy	Tons per year

Addendum A

Revision #1 - March 5, 2009
Technical Support Document
Non-Title V Operating Permit

Permit Writer: Doug Hardesty

Clearwater Forest Industries, Inc.
Permit Number: R10NT500701

Reason for Permit Revision

This Non-Title V permit, originally issued on September 27, 2007, is being revised to change the hogged fuel chloride sampling frequency and analytical method originally required. Some other minor revisions are also being made to the permit and technical support document as well. This addendum explains the changes to the permit and technical support document.

The requirements created in Non-Title V operating permits are applicable requirements that must be incorporated into Title V operating permits. Clearwater Forest Industries (CFI) was originally issued a Title V permit on February 15, 2001. The Title V permit expired on April 30, 2006, and is currently being renewed. The requirements in the revised Non-Title V permit are simultaneously being incorporated into the renewed Title V permit.

Revisions to the Statement of Basis

It is important to note when reading the original technical support document (TSD), that certain changes to the facility and permit have been made which renders some information in the original TSD inaccurate or inapplicable. Revisions to permit conditions that were explained in the original TSD are addressed in the last section of this addendum. Other parts of the TSD that have been affected by the permit revision are explained in this section.

The original TSD provides details in Section 4.3.3 on estimating emissions from the facility. Some emission factors may have changed primarily due to hogged fuel chloride sampling and analysis. As explained in the original TSD, new factors should be used as long as they were created using methods acceptable to EPA.

This permit revision follows the same public participation procedures used for the original permit and was noticed simultaneously with the Title V permit that is being renewed from December 18, 2008, to January 20, 2009. See the original TSD for more information about the public participation process. No comments on the Non-Title V permit or TSD were received during the public notice period.

Revisions to Non-Title V Permit

Several sections of the Title V permit were revised; some with only minor editorial changes and others with substantive new requirements added. Each section that was substantively revised is described below.

Permit Cover Page – A new contact for the facility was added. The latitude and longitude for the facility were added. The upper right-hand corner of the cover page lists the new permit number

(R10NT500701) and the permit that this revision replaces. Non-Title V permit numbers are created as follows:

"R10" denoted the permit is being issued by Region 10 of EPA
"NT5" denotes that this is a Non-Title V permit
"007" denotes that the original permit was the 7th Non-Title V permit issued by EPA
"01" denotes that this is the first revision to this permit

Permit Table of Contents – A table of contents page was added to help clarify that an addendum that explains the permit revisions now exists.

Permit Section 2, Emission Limits and Work Practice Requirements – In Conditions 2.1 and 2.2 the word "average" was removed. The word was confusing that fact that the emissions limits are in fact emission totals, not averages.

Permit Section 3, Monitoring and Recordkeeping Requirements – Conditions 3.2 and 3.3 were replaced by a new Condition 3.2. Condition 3.4 was then renumbered Condition 3.3. The original Condition 3.2 specified the frequency for sampling and analyzing the hogged fuel for chloride content. CFI requested relief from quarterly sampling if the results are consistently lower than expected. If the results remain low, there will be much lower chance of exceeding the emission limits in the permit. EPA agreed that the frequency could be based on how close the facility is to the emission limits. The new Condition 3.2.2 allows the adjustment of the sampling frequency from quarterly to annually if actual plant-wide emissions remain less than half of the major source thresholds. The original Condition 3.3 specified the method for determining hogged fuel chloride content by referencing the method specified in the currently-remanded boiler MACT (40 CFR 63.7521). EPA has heard from several companies that the method specified in the original permit is not commonly used by laboratories in the northwest. CFI requested the use of an alternative analytical method for determining hogged fuel chloride content. An alternative method that is considered comparable has been identified. The complete sampling and analysis procedure has been re-written in Appendix A to the permit (and referenced by Condition 3.2.1) to hopefully make the sampling and analysis procedure less confusing. The permit also adds to Condition 3.2.1 the option for a company to get an alternative method approved by EPA without a permit revision.

Permit Appendix A, Hydrogen Chloride Emission Factor Procedure for Hogged Fuel – This appendix has been added to the permit to present a complete description of the sampling and analysis method for determining hogged fuel chloride content and the hydrogen chloride emission factor that must be used when determining compliance with the emissions limits. This procedure was written to reduce any confusion caused by referencing the methods in the currently-remanded boiler MACT.