

**COMMENTS ON  
DRAFT AIR OPERATING PERMIT 0000078  
FOR WESTROCK LONGVIEW LLC**

June 23, 2020

WestRock Longview LLC (WestRock) submits the following comments on the Washington State Department of Ecology (Ecology) proposed draft Air Operating Permit 0000078 (AOP) and its corresponding statement of Basis (SOB) for the WestRock Longview Mill located at 300 Fibre Way, Longview, Washington. The suggested edits from these comments are outlined in the attached redlined versions of the draft AOP and AOP SOB. Some additional minor edits are also provided in these redline files.

**Permit Conditions**

**Comment No.1: Frequency of 40 CFR Part 60 and Part 63 semi-annual reports**

Conditions A1.2, A1.4, A2.2, A2.4, A2.5, A2.7b, B1.2, B1.4, B2.2., B2.4, C1.2, C1.4, C2.2, C2.4, C3.2, C3.4, C3.6a and G1.4c state that semi-annual reporting frequency could be “*on a more frequent basis as determined necessary by Ecology.*” WestRock requests to remove this language and cite instead the governing criteria in §60.7(c) and §63.10(e)(3) of when the agency may require more frequent reporting.

§60.7(c): “...*except when: more frequent reporting is specifically required by an applicable subpart; or the Administrator, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source.*”

§63.10(e)(3): “*except when— (A) More frequent reporting is specifically required by a relevant standard; (B) The Administrator determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source...*”

Conditions A1.2, A2.2, B1.2, B2.2, C1.2, C2.2 and C3.2 do not reference §63.10(e)(3). WestRock recommends adding this reference in these conditions.

**Comment No. 2: Conditions A1.3b, A2.3b and C3.3b (RF19, RF22 and LK5 Opacity WAC 173-405 limits)**

WestRock would like to provide a comment requesting some clarification to the interpretation of opacity WAC 173-405 limits. The opacity standard in WAC 173-405-040(6) has a time limit basis that states that “*no person shall cause or allow the emission of a plume from any kraft recovery furnace, smelt dissolver tank, or lime kiln, which has an average opacity greater than thirty-five percent for more than six consecutive minutes in any sixty minute period*” [emphasis added]. The plain reading of this limit indicates that a single six-minute average over 35% is not an exceedance of the limit and opacity would need to average over 35% for more than 6 consecutive minutes. Given that opacity monitoring is required for several of these sources by continuous opacity monitoring system (COMS) and

since monitoring data for opacity must be reduced to discrete six-minute block averages when a COMS is used as required by WAC 173-400-105, it would require two six-minute period block averages in excess of 35% within a 60 minute period to exceed that opacity limit. Ecology has interpreted this standard to mean that one six-minute period in excess of 35% is a violation. We believe that Ecology should review this interpretation and that it is appropriate to add some clarification in the permit in light of other similar particulate and opacity limitations that are also applicable to these units.

Opacity represents a monitoring parameter that is indicative of the performance of the control devices utilized for control of particulate. Particulate limitations are often represented in terms of one-hour to three-hour standards while opacity is often expressed in six-minute averages. WestRock is requesting that this linkage be more clearly recognized with respect to application of excess emissions of opacity for the WAC 173-405 limits for Recovery Furnace No. 19 (RF19), Recovery Furnace No. 22 (RF22) and Lime Kiln No. 5 (LK5). We believe that it is more appropriate to treat instances of opacity in the same manner they are in 40 CFR Part 63 Subpart MM. These units are subject to similar opacity limitations as is required by the WAC standard, some of which are even more stringent. WestRock believes that this will align operation and compliance with these opacity standards more closely with the original intent of underlying requirements. This will allow for more consistency and clarity for both the facility and for Ecology. Some more background and supporting information for this request is added below.

#### Opacity and Particulate Matter Relationship

##### EPA

There has been a long history within numerous regulatory programs to use opacity as a surrogate measurement and an indication of performance for particulate control devices. EPA, beginning with the incorporation of 40 CFR 60 Subpart BB - Standards of Performance for Kraft Pulp Mills in the 1970s and 1980s, adopted opacity limits as surrogates for particulate matter (PM) emissions. EPA also provided definitions of excess emissions and violations of these opacity standards in 40 CFR 60.284(d) and (e). The intent of these definitions was to recognize that there can be transient periods of higher opacity, but that they should be short lived and, if they are, then the underlying particulate limitations would still be maintained. In contrast, longer periods of higher opacity would be indicative of poorer performance requiring some sort of corrective action or possibly enforcement.

In the preamble to the 1974 40 CFR Part 60 rule for a number of different sources EPA discussed the reason behind opacity standards and their relationship to particulate matter standards as shown below (FR 9308-9309, Vol. 39, No. 47, March 8, 1974):

*It is evident from comments received that an inadequate explanation was given for applying both an enforceable opacity standard to the same source and that the relationship between the concentration standard and the opacity standard was not clearly presented... The concentration/mass standard is established at a level which will result in the design, installation, and operation of the best adequately*

*demonstrated system of emission reduction (taking cost into account) for each source. The opacity standard is established at a level which will require proper operation and maintenance of such control systems on a day-to-day basis, but not require the design and installation of a control system more efficient or expensive than that required by the concentration/mass standard.*

*Opacity standards are a necessary supplement to concentration/mass standards. Opacity standards help ensure that sources and emission control systems continue to be properly maintained and operated so as to comply with the concentration/mass standards. Particulate testing by EPA method 5 and most other techniques requires an expenditure... scheduling and preparation are required such that it is seldom possible to conduct a test with less than 2 weeks notice. Therefore, method 5 particulate tests can be conducted only on an infrequent basis.*

*The regulatory opacity limits are sufficiently close to observed opacity to ensure proper operation and maintenance of control systems on a continuous basis but still allow some room for minor variations from the conditions existing at the time opacity readings were made.*

*Time exemptions further reflect the stated purpose of opacity standards... The time exemptions now provide for circumstances specific to the sources and... provide much better assurance that the opacity standards are not unfairly stringent.*

In the late 1990s and early 2000s, EPA adopted additional particulate standards using opacity as a surrogate as Maximum Achievable Control Technology standards governing Kraft Mill recovery furnaces and lime kilns consistent the same framework. For example, in 1996 as part of the initial development of the NESHAP Subpart MM rule, EPA saw opacity as the surrogate measurement that best characterized the level of PM emissions for recovery furnaces and lime kilns (*Technical Support Document EPA-453/R-96-012*, October 1996). As a result, EPA established two criteria for opacity. One representing a period of time in which facilities are required to implement corrective actions and another as indicative of excess emissions.

Finally, more recently during the multi-year Residual Risk and Technology Review of the NESHAP Subpart MM rule finalized in 2017, EPA reinforced this approach by making the allowances even more stringent. In this action, EPA stated that opacity monitoring provided an additional indicator of ESP performance and that the opacity limit should be seen as an operating limit that is used as an indicator of compliance with the PM limit (Residual Risk and Technology Review, Final Amendments Response to Public Comments on December 30, 2016 Proposal, September 2017).

EPA stated that continuous compliance with the underlying PM limit is ensured through initial and repeat performance tests as well as through continuous opacity monitoring. As a result, an opacity monitoring allowance was retained in the final rule to accommodate process variability while being protective of the underlying standards. EPA stated that the requirements in the NESHAP Subpart MM rule make it feasible for the standards to apply at all times:

- Opacity monitoring allowances specifying a limited number of exceedances that will not be considered as violations, developed through review of COMS data sets while making it clear that instances in excess of these periods are violations.
- A new requirement to maintain proper operation of the ESP automatic voltage controller (AVC). The requirement for the ESP to maintain proper operation of the ESP AVC applies at all times, including times when the opacity monitoring allowance is used.

### State-Ecology

In 1987 the state legislature amended the state Air Act in regards to air quality standards and emission standards so that “*an industry, or the air pollution control authority having jurisdiction, can choose, subject to the submittal of appropriate data that the industry has quantified, to have any limit on the opacity of emissions from a source whose emission standard is stated in terms of a weight of particulate per unit volume of air (e.g., grains per dry standard cubic foot) be based on the applicable particulate emission standard for that source, such that any violation of the opacity limit accurately indicates a violation of the applicable particulate emission standard.*” RCW 70.94.331(2)(c). WAC 173-405 was amended at the time as a result of this directive. As discussed above, EPA has provided extensive historical and consistent justification for evaluating opacity in relation to underlying particulate emission standards. For the specific case of opacity limits applicable to lime kilns and recovery boilers in the pulp and paper industry, this has been an effective approach in multiple programs including 40 CFR Part 60 Subparts BB and BBa, and in 40 CFR Part 63 Subpart MM.

Ecology has recognized opacity as a surrogate for PM emissions in previous permitting actions for the site. For instance, NOC 3462-AQ07 was an administrative change to NOC Order No. DE 01AQIS-3294 that was originally issued on December 14, 2001. NOC Order No. DE 01AQIS-3294 was re-issued to include additional requirements not addressed in the 2001 PSD Permit No. 01-03 and to include unchanged limits from previous orders such as Order Nos. DE 00AQIS-704. Order No. DE 00AQIS-704 was issued on July 10, 2000 and amended previous applicable limits and superseded more than ten previously issued orders between 1975 and 1996. Order No. DE 00AQIS-704 already included opacity limits for Recovery Furnace Nos. 19 and 22, and Lime Kiln No. 5, although the origin of these opacity limits were the older orders. For instance, Order No. DE 78-115 issued on April 11, 1978 included opacity limits for Recovery Furnace No. 19.

In the “Fact Sheet for Prevention of Significant Deterioration and Notice of Construction Longview Fibre Modernization and Expansion” dated June 5, 1990 Ecology compared the opacity limits imposed on Recovery Furnace No. 22 with the NSPS Subpart BB opacity limit, which also treats excess emissions periods consistent with NESHAP Subpart MM. Ecology stated:

*A good indicator of particulate emissions and in particular PM10 emissions is stack opacity. Opacity of a stack is the amount of light that is obscured by the plume. The federal NSPS is 35 percent. Recovery furnaces with similar control equipment have*

*consistently met 20 percent opacity limitations. Ecology concludes that an opacity limit of 20 percent is BACT for Recovery Furnace No. 22. Longview will be required to continuously monitor opacity and provide reports of any excess emissions. (Fact Sheet – 2000 Revision LVF No. PSD-X81-10A Appendix A).*

The PM-opacity linkage is firmly recognized by the fact that Ecology maintains that the WAC 173-405 opacity limits are subject to Compliance Assurance Monitoring (CAM) rule requirements due to their surrogacy for PM limits. Ecology has explained that this is a view maintained by EPA as noted in the CAM section of the AOP SOB.

The applicable PM limit to RF19 and RF22 found in WAC 173-405(1)(a) is 0.10 gr/dscf @ 8% O<sub>2</sub>, 1-hr average, and the applicable PM limit to LK5 found in WAC 173-405-040(3)(a) is 0.13 gr/dscf @ 10% O<sub>2</sub>, 1-hr average. RF19 is also subject to a PM limit of 0.040 gr/dscf @ 8% O<sub>2</sub>, 1-hr average, which is 40% of the state limit, RF22 is also subject to a PM limit of 0.027 gr/dscf @ 8% O<sub>2</sub>, 1-hr average, which is 27% of the state limit, and LK5 is also subject to a PM limit of 0.035 gr/dscf @ 10% O<sub>2</sub>, 1-hr average, which is about 27% of the state PM limit. These units have been subject to monthly stack testing requirements for these more stringent PM limits since they became effective as part of the 2001 PSD permit and all results have been in compliance with these limits since. The CAM indicator range for these limits (average of ten consecutive 6-minute averages result in a measurement greater than 20% opacity) is the standard selected by EPA for continuous compliance assurance monitoring of recovery furnaces and lime kilns equipped with an ESP under 40 CFR Part 63 Subpart MM, which are also more stringent than the WAC 173-405 PM limits.

The above clearly indicates that for both EPA and Ecology's rules, opacity has the same purpose of acting as surrogate for compliance of applicable PM limits. Moreover, the specific WAC 173-405 opacity limits have the same purpose as the opacity limits imposed by NESHAP Subpart MM and NSPS Subpart BB to recovery furnaces and lime kilns. The provisions and plain language of WAC 173-405, however, do not provide the same clarity on the length of time for excess emissions as the federal standards. EPA has provided ample justification for how to appropriately treat excess emission periods of these type of 6-minute opacity averages and we believe that Ecology has the ability to include similar concepts within the permit renewal as it is in the spirit of what Ecology originally intended when it established opacity as a standard.

#### WAC 173-405 standards

The opacity standard in WAC 173-405-040(6) has a time limit basis that states that "*no person shall cause or allow the emission of a plume from any kraft recovery furnace, smelt dissolver tank, or lime kiln, which has an average opacity greater than thirty-five percent for more than six consecutive minutes in any sixty minute period*" [emphasis added]. The plain reading of this limit indicates that a single six-minute average over 35% is not an exceedance of the limit and opacity would need to average over 35% for more than 6 consecutive minutes. Given that opacity monitoring is required for several of these sources by continuous opacity monitoring system (COMS) and since monitoring data for opacity must be reduced to

discrete six-minute block averages when a COMS is used as required by WAC 173-400-105, it would require two six-minute period block averages in excess of 35% within a 60 minute period to exceed that opacity limit. The treatment of excess emission periods in 40 CFR Part 63 Subpart MM is more restrictive than the plain reading of the opacity limits in WAC 173-400-105 when taking into consideration the total unit's operating time. In this context, the current Title V permit already includes monitoring language for the mill's operating smelt dissolving tanks and lime kilns with wet scrubber air pollution control consistent with 40 CFR Part 63 Subpart MM monitoring requirements for the applicable WAC 173-405 opacity limits applicable to these sources.

As noted, the WAC 173-405 opacity limits are also subjected to CAM requirements. Per §64.8, the CAM rule allows the agency to require the development and implementation of a quality improvement plan (QIP). This section states that "*consistent with §64.6(c)(3), the part 70 or 71 permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP.*" The percent of operating time threshold for opacity excess emissions in 40 CFR Part 63 Subpart MM is consistent with these CAM requirements. The selected CAM indicator range is the same as for the strictest particulate limit for this unit and will indicate compliance for the other limits as well.

Ecology has already utilized the same criteria used by 40 CFR Part 63 Subpart MM for the WAC 173-405 opacity limits in other state permits.

#### Summary

For all the reasons listed above, WestRock believes there is ample justification to apply the excess emissions treatment of 40 CFR Part 63 Subpart MM.

#### **Comment No. 3: Conditions B1.4, B2.4, C1.4 and C2.4 (40 CFR Part 63 Subpart MM operating limits reporting)**

The draft AOP requires in these conditions to report daily minimum operating parameter 3-hour values for the operating limits on all the §63 Subpart MM sources with wet control devices. §63 Subpart MM already requires that all three hour values be maintained by the facility for inspection and for the facility to report any monitoring exceedances on its semi-annual report. The permit also already includes a requirement to report monitoring exceedances monthly for these parameters.

WestRock requests that this additional language be removed from these conditions. It is not clear what Ecology would do with this information as it cannot be used to determine emissions nor is it indicative of a concern with the control device. It is merely informational. Further, it adds an unnecessary burden to the facility to determine the minimum value as it would require significant amounts of data to be added to an already large and burdensome monthly report, especially when considered together with similar draft language added for Boiler MACT operating limit conditions (see comment No. 12).

**Comment No. 4: Condition B1.5a and B2.5a (SO2 limit from WAC 173-405 rule).**

These conditions include an SO2 limit of 1,000 ppm, 1-hr average for smelt dissolving tanks 19 and 22 citing WAC 173-405-040(9)(b) when this citation is applicable to combustion units. Please remove these conditions as smelt dissolving tanks are not combustion units.

**Comment No. 5: Condition C3.3a (LK5 opacity limit from Order 3462-AQ07).**

Correct opacity limit to 25%. The limit in Order 3462-AQ07 is 25% and not 20% or 30% as shown in the current draft AOP.

**Comment No. 6: Condition C3.6a (LK5 TRS limits).**

WestRock recommends separating the TRS limits applicable to LK5 into two different conditions. The TRS limit from the 2001 PSD permit is subject to different CEMS requirements (Condition 26) than TRS limit from 40 CFR Part 60 Subpart BB. This is also the case for reporting and a few other requirements.

**Comment No. 7: Condition C3.6b (LK5 temperature and retention time requirement from 40 CFR Part 60 Subpart BB).**

The temperature and retention time requirements included in the draft AOP do not apply to LK5 as the kiln is subject to the 8 ppm standard in §60.283(a)(5). These temperature and retention time requirements only apply to lime kilns subject to §60.283(a)(1)(iii). LK5 satisfies the combustion requirements in accordance with §60.283(a)(1)(i). Language in Condition F1.1 needs to remove reference to this monitoring requirement for LK5.

**Comment No. 8: Conditions D3.10, D3.11 and D3.12 (Clean condensate alternative requirements).**

These conditions identify the clean condensate alternative (CCA) sources, and the additional CCA collection and destruction requirements. Washer lines No. 5, 6 and 7 for which these CCA requirements were needed have been permanently removed from service. WestRock requests that this is documented in the AOP SOB and to add a reference to this in these permit conditions.

**Comment No. 9: Condition F1 (40 CFR Part 60 Subpart BB for digesters and evaporators).**

Conditions F1 and F1.1 cite Kamyr Washers No.1 and No. 2 as subject to the requirements of 40 CFR Part 60, Subpart BB. These washers at the Longview mill Kamyr digesters are diffusion washers as discussed in the SOB of the draft AOP. Per §60.280(a), brown stock washer systems are the only stock washing systems subject to the provision of this subpart. Diffusion washers are excluded from the brown stock washer system definition in §60.281.

**Comment No. 10: Condition G1.1e (PB20 40 CFR Part 60 Subpart Db PM limit).**

WestRock recommends to document in the AOP SOB EPA's approval of the performance test waiver for the PM limit in §60.43b(h)(4) granted on a letter dated December 12, 2012 and reference this waiver in Condition G1.1e as necessary.

**Comment No. 11: Condition G1.3c (PB20 40 CFR Part 60 Subpart Db Opacity monitoring).**

WestRock recommends to document in the AOP SOB EPA's approval of opacity alternative monitoring for the opacity limit in §60.43b(f) granted on a letter dated February 24, 2012 and reference this approval in Condition G1.3c as necessary.

EPA approved monitoring of the scrubber and wet electrostatic precipitator parameters in the Emission Control Compliance Demonstration Plan (ECCDP) applicable to Power Boiler 20 instead of opacity.

**Comment No. 12: Conditions G1.12, G1.13, G1.14 and G1.18 (PB20 Boiler MACT operating limits reporting)**

The draft AOP includes language in these conditions to report daily 30-day rolling averages for the operating limits for total secondary electric power, scrubber pressure drop, scrubber flows and operating load. Considering that PB is equipped with four wet scrubbers and two wet electrostatic precipitators and that the facility has chosen to use the last 720 valid hours of operation to calculate the 30-day rolling averages, there would be 24 different averages for each parameter for a total of 264 different averages each day, 7,920 different averages each 30-day month and 96,360 different averages each year. The facility is required to report semi-annually periods when these parameters fail to meet the operating level limits that were established during performance testing.

WestRock requests that this language be removed from these conditions. It is not clear what Ecology would do with this information as it cannot be used to determine emissions nor is it indicative of a concern with the control device. It is merely informational. Further, adds unnecessary burden to the facility as it would require large amounts of data to be added to an already large and burdensome monthly report. It should be noted that EPA had originally proposed a similar reporting requirement for operating limit averages, but it was removed from the final rule due to the overly burdensome concerns of such a reporting requirement.

The draft conditions also have language to "report exceedances monthly." The Boiler MACT rule does not use the term "exceedances" for operating limits and as mentioned, it already requires the reporting of operating limit deviations on a semi-annual basis. This is also a redundant reporting requirement, but if it is to be kept, it should read to report operating limit deviations monthly.

**Comment No. 13: General Condition 27 (NSPS CMS Data Recovery).**

This general condition is cited as applicable to 40 CFR Part 60 (NSPS) sources for continuous monitoring systems (CMS) data recovery. The condition is cited as applicable to Conditions

A2.4 and A2.7b. The draft language in this condition includes the following reference and language that is inconsistent with the CMS data recovery requirements in 40 CFR Part 60 as shown below:

*[40 CFR 63.8(c)(4)]*

*The Permittee shall make every effort to acquire, maintain, and recover valid monitoring data. CMS downtime and resulting monitoring data loss due to malfunctions shall be less than 10% of the monthly unit operating time. An explanation for the loss of monitoring data must be provided in the monthly report. Periods when CMS data is not recovered due to daily calibration, zero and span checks are not considered nor reported as CMS downtime in the monthly report. Records of daily calibration, zero and span checks shall be kept for a period of five years and made available upon request to Ecology. [40 CFR 70.6(c)(1)]*

*The cited provision of 40 CFR 70.6(c)(1) states the following: Consistent with paragraph (a)(3) of this section, compliance certification, testing, monitoring, reporting, and recordkeeping requirements sufficient to assure compliance with the terms and conditions of the permit. Any document (including reports) required by a part 70 permit shall contain a certification by a responsible official that meets the requirements of §70.5(d) for this part.*

- 40 CFR 63.8(c)(4) is a citation not applicable to 40 CFR Part 60 sources.
- We believe that the language in the permit goes well beyond the requirement of being sufficient to assure compliance. The following examples already exist as applicable requirements from other standards and are in conflict with this language. The “shall be less than 10%” draft language is not found in 40 CFR 60 and it is in conflict the % time requirements established in §60.7(d)(1) and (2), which is 5%.
- This language is also not found in any of the applicable subparts to the 40 CFR Part 60 units at the Longview mill.
- The added language assesses CMS downtime base on the unit’s monthly operating time. 40 CFR Part 60 Subparts BB define the unit’s operating time period for reporting and CMS downtime evaluation is semiannual and not monthly.
- The draft language that states that “*CMS data is not recovered due to daily calibration, zero and span checks are not considered nor reported as CMS downtime*” is in conflict with language in §60.13(e) that excludes from CMS downtime “*system breakdowns, repairs, calibration checks, and zero and span adjustments required under paragraph (d) of this section, all continuous monitoring systems shall be in continuous operation and shall meet minimum frequency of operation requirements.*” §60.13(e) language is included in the first part of this same general condition.

WestRock requests that the aforementioned draft language is removed from this condition and only include the CMS data recovery language found in 40 CFR Part 60 or for this entire condition to be removed from the general conditions as the mill units subject to 40 CFR Part 60

subparts already include references to the applicable requirements in §60.7, §60.13 and any other specific subpart conditions related to CMS data recovery. Note that the language in WAC 173-400-105(7), which is the basis of Condition 26, is consistent with CMS data recovery requirements in 40 CFR Part 60.7 and 60.13.

**Comment No. 14: General Condition 28 (MACT CMS Data Recovery).**

This general condition is cited as applicable to 40 CFR Part 63 (MACT) sources for continuous monitoring systems (CMS) data recovery. The condition is cited as applicable to Conditions A1.4, A2.5, B1.4, B2.4, C1.4, C2.4, C3.4, C3.6a, G1.12, G1.13, G1.14 and G1.18. The draft language in this condition includes the following reference and language that is inconsistent with the CMS data recovery requirements in 40 CFR Part 63 as shown below:

*The Permittee shall make every effort to acquire, maintain, and recover valid monitoring data. CMS downtime and resulting monitoring data loss due to malfunctions shall be less than 10% of the monthly unit operating time. An explanation for the loss of monitoring data must be provided in the monthly report. Periods when CMS data is not recovered due to daily calibration, zero and span checks are not considered nor reported as CMS downtime in the monthly report. Records of daily calibration, zero and span checks shall be kept for a period of five years and made available upon request to Ecology. [40 CFR 70.6(c)(1)]*

*The cited provision of 40 CFR 70.6(c)(1) states the following: Consistent with paragraph (a)(3) of this section, compliance certification, testing, monitoring, reporting, and recordkeeping requirements sufficient to assure compliance with the terms and conditions of the permit. Any document (including reports) required by a part 70 permit shall contain a certification by a responsible official that meets the requirements of §70.5(d) for this part.*

- We believe that the language in the permit goes well beyond the requirement of being sufficient to assure compliance. The following examples already exist as applicable requirements from other standards and are in conflict with this language. The “shall be less than 10%” draft language is not found in 40 CFR 63 and it is in conflict the % time requirements established in §63.10(e)(2)(vii) and (viii), which is 5%.
- This language is also not found in any of the applicable subparts to the 40 CFR Part 63 units at the Longview mill and is in conflict with specific CMS requirements in the applicable 40 CFR Part 63 subparts. For instance, 40 CFR 63.7535 includes the specific CMS requirements for §63 Subpart DDDDD. These requirements are included in condition G1.24.
- The added language assesses CMS downtime base on the unit’s monthly operating time. 40 CFR Part 63 Subparts S, MM and DDDDD define the unit’s operating time period for reporting and CMS downtime evaluation is semiannual and not monthly.
- The draft language that states that “CMS data is not recovered due to daily calibration, zero and span checks are not considered nor reported as CMS downtime” is in conflict with language in §63.8(c)(4) that excludes from CMS

*downtime “system breakdowns, out-of-control periods, repairs, maintenance periods, calibration checks, and zero (low-level) and high-level calibration drift adjustments, all CMS, including COMS and CEMS, shall be in continuous operation and shall meet minimum frequency of operation requirements.”*

§63.8(c)(4) language is included in the first part of this same general condition.

WestRock requests that the aforementioned draft language is removed from this condition and only include the CMS data recovery language found in 40 CFR Part 63 or for this entire condition to be removed from the general conditions as the mill units subject to 40 CFR 63 subparts already include references to the applicable requirements in §63.8, §63.10 and any other specific subpart conditions related to CMS data recovery. Note that the language in WAC 173-400-105(7), which is the basis of Condition 26, is consistent with CMS data recovery requirements in 40 CFR Part 63.8 and 63.10.

**Comment No. 15: General Condition 66 (Use of elemental chlorine).**

This condition should be removed from the permit as the bleach plant is no longer in operation.

**Comment No. 16: Appendix B (ECCP parameters for LK4).**

The ECCDP shows a value of 170 as a loading rate limit for Lime Kiln No. 4 when firing oil instead of the proper equation to calculate it (“ $[TCaO/D + \% \text{ oil substitution (heat input basis)}] \leq 215$ , and oil substitution  $\leq 50\%$  (heat input basis).”).