OLYMPIC REGION CLEAN AIR AGENCY

2940 B Limited Lane NW - Olympia, Washington 98502 - 360-539-7610 – Fax 360-491-6308

FORM 1
NOTICE OF CONSTRUCTION

TO CONSTRUCT - INSTALL - ESTABLISH OR MODIFY AN AIR CONTAMINANT SOURCE

Business Name:
International Paper Olympia

Mailing Address:
PO Box 101 Olympia, WA 98507

Physical Address of Project or New Source:
7727 Union Mill Rd SE, Olympia, WA 98503

Billing Address:
PO Box 101 Olympia, WA 98507

For ORCAA use only

File No: 849
County No: 67
Source No: 824
Application No: 21SMO-1535

Date Received:
Received
OCT 25 2021
ORCAA

Are you currently registered with ORCAA? Yes [X] No [ ]

Previous business name (if any): Weyerhaeuser

Process/ Equipment to be installed:
Permit modification

Do you request confidentiality? Yes [ ] No [✓]

If yes, provide a separate copy of the application void of the materials considered confidential. Each page considered confidential must be individually identified by stamping "confidential" or similar method.

[Confidentiality reasons: Trade secrecy and similar concepts whereby limited disclosure is necessary to retain business advantages.]

This project must meet the requirements of the State Environmental Policy Act (SEPA) and applicable building and fire codes before ORCAA can issue final approval. Complete one of the following options.

[ ] SEPA was satisfied by _____(government agency) on ___/___/___ (date). A copy of the final determination and the environmental checklist is enclosed.

[ ] SEPA is pending approval by _____(government agency). A copy of the environmental checklist is enclosed and a copy of the final determination will be forwarded to ORCAA when issued.

[ ] ORCAA is the only government agency requiring a permit. A completed environmental checklist or documentation that the project or new source is/will be in compliance with local building and fire codes is enclosed.

[ ] This project is exempt from SEPA per _____ (WAC citation).

I hereby certify that the information contained in this request is, to the best of my knowledge, complete and correct.

Agency Use Only

Name of Applicant or Owner of Business:
Damon Alexander

Title: Manufacturing Manager
Phone: 360-455-3446

Email: damon.alexander@ipaper.com

Contact Name (if different than above):
Jared Williamson

Title: EHS Manager
Phone: 3604553413

Email: jared.williamson@ipaper.com

Signature:
Date: 10/22/21

Revised July 2011

INTERNATIONAL PAPER

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October 20th, 2021

Jennifer DeMay

Engineering Supervisor

ORCAA

2940 Limited Ln NW

Olympia, WA 98502

Dear Jennifer DeMay

Below you will find the proposed emission factors for corrugator operations at the International Paper Olympia Container plant. We feel there is no need to revise the facility wide allowable emissions or to revise any current emission factors. Inclusion of corrugator HAP emissions will add approximately 3 to 4 tons of total HAP, relative to the site allowable of 20 tons. Please submit an invoice for the SMO filing fee so that it can be processed.

1. Adopt NCASI corrugator VOC and HAP emission factors and incorporate into emission tracking/recordkeeping and reporting.
   a. IP recommended corrugator VOC and HAP factors:

Pollutant	Single Wall Lb/MSF	Double Wall Lb/MSF
VOC as C	2.2E-3	3.5E-3
Acetaldehyde	1.7E-4	2.2E-4
Acrolein	8.2E-5	8.3E-5
Formaldehyde	1.2E-4	1.6E-4
Methanol	2.0E-3	3.3E-3
Propionaldehyde	6.5E-5	1.3E-4

   b. Corrugator HAP factors derived from: *NCASI Corrugator Sheet Plant testing for NMTGOC and Select HAPs – May 2018 Update (5/17/2018);*
   c. *Derivation of IP Corrugator Emission Factors. Data averaging and application of non-detect values to derive best available emission factors for use at IP facilities.*
   d. *Note that the IP recommended HAP emission factors for single and doublewall corrugated product are all higher than the factors provided by WA ORCAA.*

2. *Update waste paper handling system particulate emission factors.*
   a. *IP recommended PM/PM10/PM2.5 emission factors- trim cyclone systems*

Pollutant	Emission Factor	
PM	2.1 lb/ton of scrap	
PM10	0.36 lb/ton of scrap	
PM2.5	0.06 lb/ton of scrap	

   b. *Trim system cyclone emission factors derived from 2019 study by NCASI (National Council for Air and Stream Improvement), Plant E. [Interim Report on Particulate Testing of Trim and Scrap Handling Cyclones at Corrugating/Converting Plants D & E, June 2020]. Emission sampling was conducted using EPA Method 201A and 202 in a section of straight ductwork at a location downstream of the trim cyclone and upstream of a baghouse. Emission factors from Plant E are most representative of standalone cyclone operations because tests were conducted without dust recirculation from the baghouse.*

3. *Add starch silo as a source of PM.*
   a. *IP recommended emission factors*

Pollutant	Emission Factor
PM	0.0005 lb/ton of starch
PM10	0.0003 lb/ton of starch
PM2.5	0.0001 lb/ton of starch

   b. *The starch silo emission factors are adapted from the AP-42 Table 9.9.1-1 uncontrolled particulate emission factors for grain elevators - straight truck, based on recommendations in AP-42, table B.2-1 for pneumatic starch loading systems. Particle size specific removal efficiencies for typical baghouses (from AP-42, Table B.2-3) were applied to uncontrolled factors to develop starch silo PM emission estimates.*

Sincerely,

Damon Alexander
Manufacturing Manager