

ATTACHMENT 9

**Paper Division****Boise Cascade**

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May 15, 2001

Merley McCall
Department of Ecology
Industrial Section
P.O. Box 47706
Olympia, WA 98504-7706

Subject: Wallula Mill No.1 M&D Digester Pocket Feeder Secondary Exhaust--
Request for Inapplicability Determination

Dear Mr. McCall,

During the past 12 months, the Boise Cascade Wallula Mill has had several discussions with the Department regarding whether 40 CFR §63.443(a)(1)(i) rules apply to the secondary exhaust steam from the mill's #1 M&D sawdust digester. Earlier this year, Boise Cascade requested and was granted a 12-month extension in order for the mill to pursue engineering work necessary to complete the design and installation of a new chip bin. It was believed that the newly designed chip bin would allow the unit to be run with the fresh pocket purge steam routed to the bottom of the sawdust bin (without plugging) and exactly meet the specific exemption provided for continuous digesters by the EPA in the March 31, 2000 MACT I Q&A Guidance Document, Volume 2.

During the past several months, in addition to beginning design work for the new chip bin, the mill has pursued a thorough evaluation of the existing operation of the digester. Boise Cascade contacted the Longview Fiber mill and learned of the similarities between continuous sawdust digesters at each location. Further discussions with Longview Fiber were held and a site visit arranged so that Boise Cascade could observe the digester system. Boise Cascade learned that the Longview mill had been able substantially reduce its secondary exhaust methanol/HAP emissions using a rebuilt Bauer Valve and heavy use of fresh steam in a post-pocket-purge mode. Using such an operating scheme, Longview Fiber was able to consistently measure negligible methanol emissions from their secondary exhaust line and the top of their sawdust digester chip bin.

Based on Longview Fiber's experience and information gathered during the past several months, Boise Cascade has confirmed a similar operating configuration on the mill's No. 1 M&D Digester. This operating configuration relies on continuous transfer of the digester vapor space gases to the mill's existing LVHC non-condensable gas collection and treatment system. The collection system is routed to either the Lime Kiln or Hog Fuel Boiler for thermal destruction. Additionally, the mill utilizes fresh steam for post-pocket purge of the Bauer valve, ensuring that only negligible quantities of methanol/HAPs are vented to the atmosphere through the chip bin. No foul digester steam is used to presteam chips in this system. Stack Testing has just recently been completed on the chip bin atmospheric vent--the chip bin receives the secondary pocket feeder exhaust. Tests conducted according to NCASI Method 98.01 by Antec Environmental Services on May 8th show results consistent with those obtained by Longview Fiber. Methanol

emissions ranged from 8 to 14 parts per million dry volume (ppmdv). The test result summary sheet is attached for your review. A full test report will be submitted as soon as it has been finalized and received by the mill.

While the regulations pertaining to digester system collection requirements do not specifically mention a requirement to collect secondary exhaust from continuous digesters, they do mention that "chip steamers not using fresh steam" are covered by the rule (40 CFR §63.441 *Digester system*). The Boise Cascade Wallula Mill does not use foul digester steam to pre-steam chips in the chip steamer, and therefore does not come directly under this rule. Given the performance achieved with this operating configuration for the mill's continuous sawdust digester, and the similar results achieved by Longview Fiber's digester in a directly comparable operating mode, we believe that the intent of the original rule is satisfied. This is demonstrated by the testing which shows that the pocket purge fresh steam provides adequate scouring and purging of the pocket, and that only "fresh steam" is returned to the top of the chip bin and ultimately vented to atmosphere.

Boise Cascade requests your approval and determination that the secondary exhaust line of the No. 1 M&D Digester is not subject to MACT §63.443(a)(1)(i) further controls beyond use of fresh pocket purge steam in its present operating configuration. Pending your approval, the Wallula Mill also requests that the MACT Order No. DE 01AQIS-2011 dated February 16, 2001 be withdrawn.

If you need any additional information or would like to meet with us to discuss this matter in greater detail, please let me know.

Sincerely,

BOISE CASCADE PAPER DIVISION



Kevin Scott
Environmental Manager

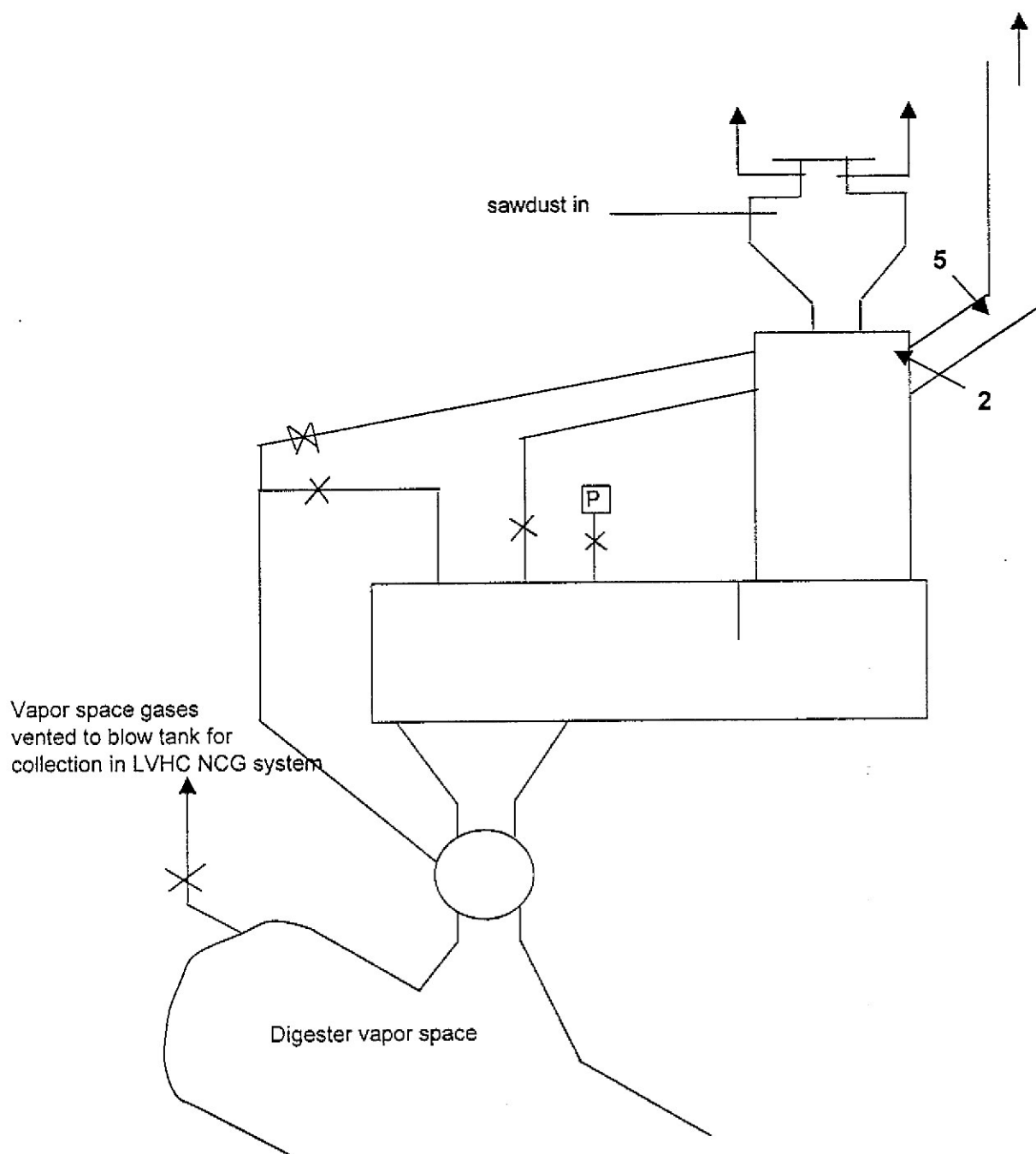
Cc: Teddy Le, Industrial Section
Rich Garber

NCASI Method 98.01 Methanol

Client: Boise Cascade
Location: Wallula, WA
Source: M&D Digester
Date: May 8, 2001
Project No.: 2001.5.7

<u>Sample Point 2</u>		<u>Sample Point 5</u>	
<u>Run #1</u>	<u>Run #2</u>	<u>Run #1</u>	<u>Run #2</u>
5/8/01	5/9/01	5/8/01	5/9/01
1503	845	1503	925
1533	915	1533	955
30	30	30	30
<u>Total Sample Time, min.:</u>		426.7	403.0
<u>Orifice Beginning Flow Rate, ml/min:</u>		423.8	433.6
<u>Orifice End Flow Rate, ml/min:</u>		425.3	418.3
<u>Average Orifice Flow Rate, ml/min:</u>		70.0	104.0
<u>Average Orifice Temp, OF:</u>		30.25	30.15
<u>Barometric pressure, in. Hg:</u>		768.35	765.81
<u>Barometric pressure, mm. Hg:</u>		20.0	1.0
<u>Average Calib., Orifice Vacuum, Hg":</u>		1.0	1.0
<u>Average Sample, Orifice Vacuum, Hg":</u>		0.4299	0.3663
<u>Sample Volume, L/min:</u>		0.160	0.220
<u>Total Milligrams Collected:</u>		32.04	32.04
<u>Methanol Molecular weight:</u>		1.00	1.00
<u>Method correction factor:</u>		8.2	10.6
<u>Methanol parts per Million, ppm dry:</u>			

Wallula Pulp Mill
No. 1 M&D Pocket Feeder Testing



MDtesting6; 05/15/2001; dpk