

**Statement of Basis**  
**Boise White Paper, LLC.**  
**Facility No. 102-0001**  
**Title V Modification**

**Introduction**

The Department received an application on September 24, 2021, from Boise White Paper, LLC – Jackson Mill (the Mill) for a proposal to modify their Title V Operating Permit. Additional information was submitted to the Department on October 5, 2021. The initial Title V Major Source Operating Permit was issued on July 1, 2003. The Mill's current Title V Permit was issued on October 1, 2020 (effective October 1, 2020) and expires on June 30, 2025.

The Mill operated an integrated bleached pulp and 1,350 tons per day of uncoated freesheet paper. Due to the COVID pandemic, and future market demand for copy/printer paper, the Mill was authorized, per Prevention of Significant Deterioration (PSD) Permits 102-0001-X033 and Permit 102-0001-X034 issued on April 16, 2021, to implement modifications to convert the No. 1 and 3 Paper Machines from uncoated free sheet paper production to manufacture unbleached kraft containerboard using virgin unbleached kraft pulp, recycled pulp, or mixture of virgin and recycled unbleached pulp. Additional modifications have included utilizing the existing Deink Plant to process old corrugated container (OCC) and double-lined kraft (DLK) recycled pulp, and converting the existing pre-bleach decker and D<sub>100</sub> and D-1 stage bleach washers into a second brown stock washer line. The Mill also operates three power boilers, combination boiler, lime kiln, recovery furnace, and smelt tank. The Mill is allowed to operate 8760 hours per year unless otherwise specified. The Mill is currently considered a major stationary source with respect to Title V for filterable particulate matter (PM), PM<sub>10</sub>, PM<sub>2.5</sub>, condensable PM, sulfur dioxide (SO<sub>2</sub>), carbon monoxide (CO), volatile organic compounds (VOC), total reduced sulfur (TRS), carbon dioxide (CO<sub>2</sub>), total hazardous air pollutants (HAPs), acetaldehyde, chloromethane, hydrochloric Acid, and methanol.

**Proposed Changes**

The Mill is requesting to remove the Bleaching Plant (Emission Unit S445). The Bleaching Plant was originally constructed in 1964 and was subject to 40 CFR Part 63 Subpart S. This unit has not operated since October 27, 2020. The Mill has permanently retired this unit.

The Mill is also requesting to remove the Chlorine Dioxide Generator (Emission Unit X014) and the Methanol Storage Tank (Emission Unit X015). These units were originally constructed in 1991, but have not operated since October 27, 2020. The Mill has permanently retired these units.

The Mill is also requesting to remove the Deink Plant (Emission Unit X028) and add the No. 1 Recycle Plant to the section listed as Sources Subject Only to the General Provisos. On February 11, 2021, the Department responded with a non-applicability letter approving the modification of the existing Recycle Mill to install a hydropulper and increase the capacity from 300 air-dry tons of pulp to 750 air-dry tons of pulp per day.

The Mill has proposed the following revisions and conditions in order to incorporate the modifications from the PSD permit (102-0001-X033 and 102-0001-X034):



- In the Informational Summary of the Brown Stock System, remove 100% Softwood Pulp and add operating capacity of Batch Digesters 1-6.
- In the Informational Summary of the Brown Stock System, remove 100% Hardwood Pulp and add operating capacity of Brown Stock Washers.
- In the Informational Summary of the No. 2 Recovery Furnace, change the operating capacity based on the November 5, 2020 performance stack test parameters per 40 CFR 63.867(b)(3)(iv) for black liquor solids firing rate for any kraft or soda recovery furnace.
- In the Informational Summary of the No. 2 Smelt Dissolving Tank, change the operating capacity based on the November 5, 2020 performance stack test parameters.
- In the Informational Summary of the Combination Boiler, add Paper Recycling Residuals as the Mill was approved on December 3, 2020 for a Section 502(B)(10) change to burn paper recycling residuals in the Combination Boiler.
- In the Emission Standards section, proviso 2 and Recordkeeping and Reporting Requirements, proviso 2 of the Pulping System Processes, remove “anaerobic treatment system” as the Mill will no longer utilize the bleaching process.
- In the Process Condensates Emission Standards, Monitoring Requirements, and Recordkeeping and Reporting Requirements sections, change to reflect the hazardous air pollutants collection and treatment standards from 40 CFR 63.446(c) and (e) for unbleached kraft pulp mills.
- In Sources Subject Only to the General Provisos, add the No. 2 Recycle Plant.

#### **Title V Modification**

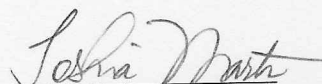
The proposed changes should be classified as a significant modification to the Title V Operating Permit. A 30-day public comment period and a 45-day EPA comment period would be required. The modifications would be incorporated into the Title V Permit upon completion of the EPA review.

#### **Environmental Justice**

The Department utilized EJSCREEN screening tool to perform an analysis of the area. (see Appendix A)

#### **Recommendations**

I recommend that Boise – Jackson Mill’s Title V Permit be modified as attached.



Toshia Martin  
Industrial Chemical Section  
Chemicals Branch

October 18, 2021

Date

## Appendix A



## EJSCREEN Report (Version 2020)

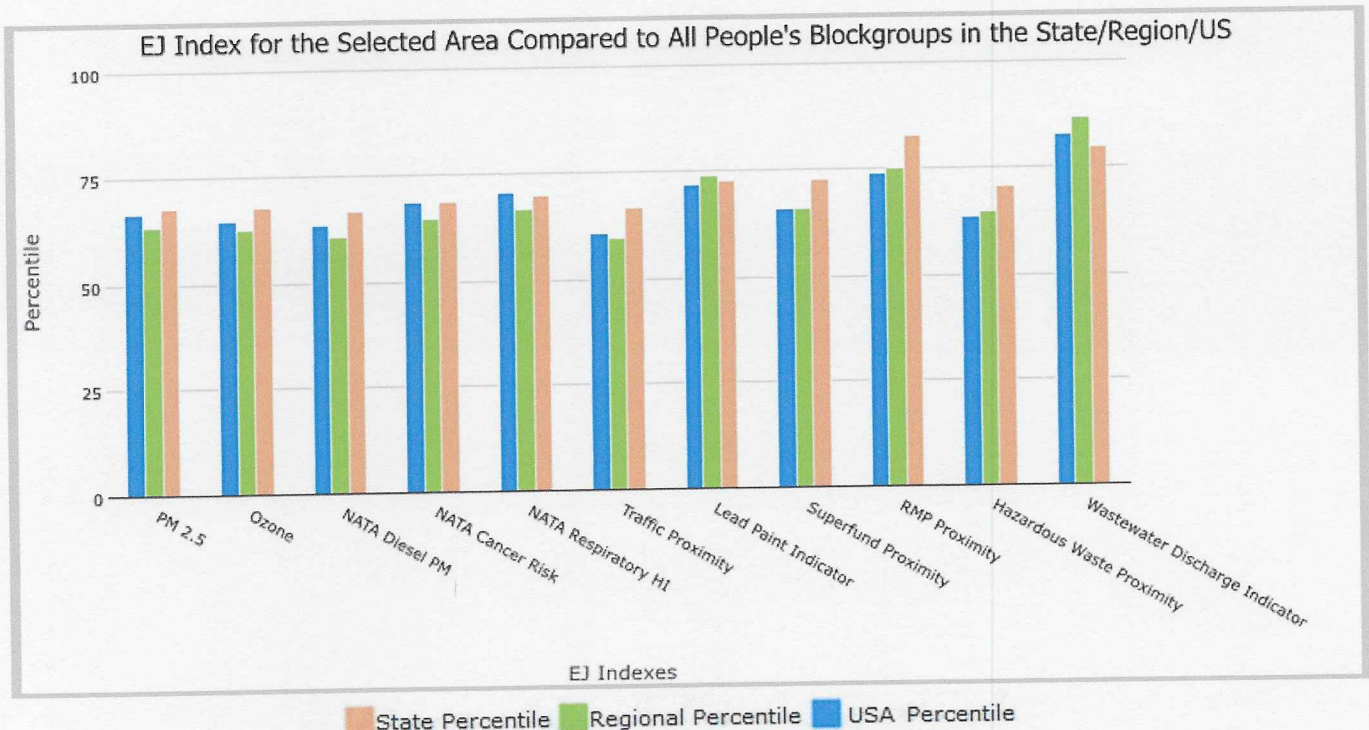


5 miles Ring Centered at 31.495899,-87.899487, ALABAMA, EPA Region 4

Approximate Population: 5,878

Input Area (sq. miles): 78.53

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
<b>EJ Indexes</b>			
EJ Index for PM2.5	68	64	67
EJ Index for Ozone	68	63	65
EJ Index for NATA* Diesel PM	67	61	64
EJ Index for NATA* Air Toxics Cancer Risk	69	65	69
EJ Index for NATA* Respiratory Hazard Index	70	67	71
EJ Index for Traffic Proximity and Volume	67	60	61
EJ Index for Lead Paint Indicator	73	74	72
EJ Index for Superfund Proximity	73	66	66
EJ Index for RMP Proximity	83	75	74
EJ Index for Hazardous Waste Proximity	71	65	64
EJ Index for Wastewater Discharge Indicator	80	87	83



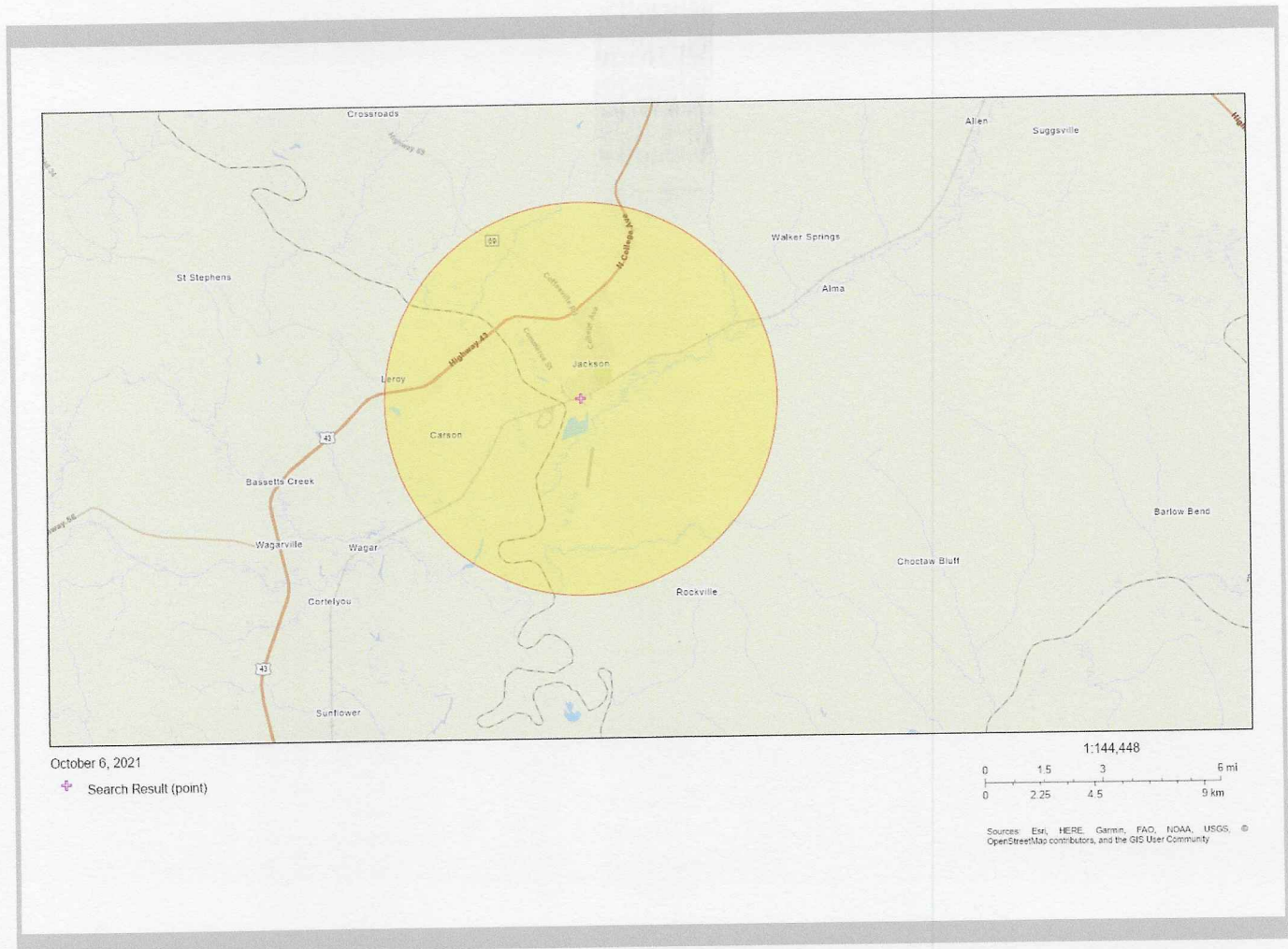
This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.



**5 miles Ring Centered at 31.495899,-87.899487, ALABAMA, EPA Region 4**

**Approximate Population: 5,878**

**Input Area (sq. miles): 78.53**



<b>Sites reporting to EPA</b>	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	1



## EJSCREEN Report (Version 2020)



5 miles Ring Centered at 31.495899,-87.899487, ALABAMA, EPA Region 4

Approximate Population: 5,878

Input Area (sq. miles): 78.53

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
<b>Environmental Indicators</b>							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$ )	8.78	9.31	18	8.57	61	8.55	57
Ozone (ppb)	34.2	38	7	38	23	42.9	8
NATA* Diesel PM ( $\mu\text{g}/\text{m}^3$ )	0.201	0.346	26	0.417	<50th	0.478	<50th
NATA* Cancer Risk (lifetime risk per million)	44	43	56	36	90-95th	32	90-95th
NATA* Respiratory Hazard Index	0.72	0.65	72	0.52	95-100th	0.44	95-100th
Traffic Proximity and Volume (daily traffic count/distance to road)	33	220	36	350	28	750	20
Lead Paint Indicator (% Pre-1960 Housing)	0.18	0.18	67	0.15	72	0.28	50
Superfund Proximity (site count/km distance)	0.036	0.054	57	0.083	49	0.13	32
RMP Proximity (facility count/km distance)	0.67	0.41	82	0.6	72	0.74	66
Hazardous Waste Proximity (facility count/km distance)	0.23	0.82	40	0.91	41	5	28
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.00076	1.2	58	0.65	74	9.4	64
<b>Demographic Indicators</b>							
Demographic Index	47%	36%	73	37%	69	36%	71
People of Color Population	46%	34%	71	39%	64	39%	63
Low Income Population	48%	38%	70	36%	72	33%	77
Linguistically Isolated Population	0%	1%	71	3%	51	4%	45
Population With Less Than High School Education	15%	14%	56	13%	62	13%	67
Population Under 5 years of age	6%	6%	54	6%	55	6%	52
Population over 64 years of age	21%	16%	77	17%	76	15%	78

\* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: [www.epa.gov/environmentaljustice](http://www.epa.gov/environmentaljustice)

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.