

Washington State Department of Ecology
Eastern Region Office
4601 North Monroe
Spokane, Washington 99205-1295

In the Matter of Compliance by **BOISE CASCADE WOOD PRODUCTS, LLC KETTLE FALLS PLYWOOD** with Section 70A.15.2260 RCW, Operating Permits for Air Contaminant Sources, and the applicable rules and regulations of the Department of Ecology)
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Air Operating Permit
Draft Permit

To: Boise Cascade Wood Products, LLC
1274 South Boise Road
Kettle Falls, Washington 99141

Issuance Date: TBD
Effective Date: DATE, 2024
Expiration Date: DATE, 2029

Responsible Official: Christina Dayton, Inland Region Environmental Engineer
AQPID Number: A0650008

Legal Authority: This Air Operating Permit is issued under the authority and provisions of the Federal Clean Air Act (FCAA), (42 U.S.C. 7401, et seq.), the Washington Clean Air Act, Chapter 70A.15 Revised Code of Washington (RCW) and the Operating Permit Regulation, Chapter 173-401 Washington Administrative Code (WAC).

Hereinafter, Boise Cascade Wood Products, LLC is called the permittee. The permittee is required to comply with the provisions contained within this permit.

This Renewal Air Operating Permit, DATED at Spokane, Washington, this XX day of MONTH, 2024.

Prepared By:

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Table of Contents

List of Abbreviations.....	3
1.0 Standards Conditions	5
Your right to appeal.....	17
Address and Location Information.....	18
2.0 Applicable Requirements	21
3.0 Monitoring, Recordkeeping, and Reporting Requirements (MRRR).....	35
4.0 Inapplicable Requirements	52
Appendix A: Federal and State Regulation Date Reference List.....	55

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List of Abbreviations

AOP	Air Operating Permit
BACT	Best Available Control Technology
BTU	British Thermal Units
°C	Degrees Celsius
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
dscf	Dry Standard Cubic Foot
dscf/m	Dry Standard Cubic Foot per minute
Ecology	Washington State Department of Ecology
E.I.T.	Engineer in Training
EPA	United States Environmental Protection Agency
°F	Degrees Fahrenheit
FCAA	Federal Clean Air Act
FDCP	Fugitive Dust Control Plan
ft ³	Cubic foot
gr/dscf	Grain per dry standard cubic foot
hr	Hour
MMBtu	Million British Thermal Units
MRRR	Monitoring, Recordkeeping, and Reporting Requirement
MVAC	Motor Vehicle Air Conditioner
N ₂	Nitrogen gas
NOC	Notice of Construction
NO _x	Oxides of Nitrogen
NSPS	New Source Performance Standard
O ₂	Oxygen
O&M	Operation & Maintenance
P.E.	Professional Engineer
PM	Particulate Matter
PM-10	Particulate Matter with aerodynamic diameter ≤ 10 micrometers
ppm	Parts per million

PSD	Prevention of Significant Deterioration
QIP	Quality Improvement Plan
RACT	Reasonably Available Control Technology
RCW	Revised Code of Washington
RM	EPA Reference Method from 40 CFR Part 60, Appendix A
SERP	Source Emission Reduction Plan
scfm	Standard Cubic Feet per Minute
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TAP	Toxic Air Pollutant
TPY	Tons per Year
TSP	Total Suspended Particulate
VOC	Volatile Organic Compound
WAC	Washington Administrative Code
yr	Year

All information required for submittal throughout this permit, is to be submitted to Ecology, EPA, or both as specified by the applicable requirement, at the following addresses:

Air Quality Program
Department of Ecology
4601 North Monroe
Spokane, WA 99205-1295

U.S. EPA Region 10
Office of Air, Waste and Toxics (AQT-150)
1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3140

1.0 Standards Conditions

1.1 Permit Shield

1.1.1 Compliance with the terms and conditions of this permit will be deemed compliance with those applicable requirements that are specifically included and identified in this permit as of the date of permit issuance.

1.1.2 The permit shield will not apply to any insignificant emissions unit or activity designated under WAC 173-401-530.

[WAC 173-401-530(3)], [WAC 173-401-640(1)]

1.2 Enforceability

All terms and conditions of this permit are enforceable by the EPA and citizens unless specifically designated as state-only enforceable.

[WAC 173-401-625]

1.3 Permit Fees

The permittee must pay fees as a condition of this permit in accordance with Ecology's fee schedule. Failure to pay fees in a timely fashion will subject the permittee to civil and criminal penalties as prescribed in Chapter 70A.15 RCW. Ecology may revoke this operating permit if the permit fees are not paid, per WAC 173-401-930(3).

[WAC 173-401-620(2)(f), 930(3)], [RCW 70A.15.2270]

1.4 Permit Continuation

This permit and all terms and conditions contained therein, including any permit shield provided under WAC 173-401-640, will not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) will remain in effect until the renewal permit has been issued or denied if a timely and complete application has been submitted.

[WAC 173-401-620(2)(j)]

1.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege.

[WAC 173-401-620(2)(d)]

1.6 Inspection and Entry

Upon presentation of credentials and other documents as may be required by law, the permittee must allow Ecology, EPA, or an authorized representative to perform the following:

1.6.1 Enter upon the permittee's premises where a chapter 401 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

1.6.2 Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.

- 1.6.3 Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
- 1.6.4 As authorized by WAC 173-400-105 and the FCAA, sample or monitor, at reasonable times, substances, or parameters for the purpose of assuring compliance with this permit or other applicable requirements.
 - 1.6.4.1 Ecology may require the permittee to conduct stack testing and/or ambient air monitoring and report the results to Ecology.
 - 1.6.4.2 Ecology may conduct or require that a test be conducted using approved methods from 40 CFR parts 51, 60, 61 and 63 (in effect on February 20, 2001), or Ecology's Source Test Manual – Procedures for Compliance Testing. The permittee will be required to provide platform and sampling ports. Ecology must be allowed to obtain a sample from any emissions unit. The permittee will be given the opportunity to observe the sampling and to obtain a sample at the same time.
- 1.6.5 No person will obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties.
- 1.6.6 Nothing in this condition will limit the ability of EPA or Ecology to inspect or enter the premises of the permittee under Section 114 or other provisions of the FCAA.

[WAC 173-401-630(2)], [WAC 173-400-105(2),(4)], [RCW 70A.15.2500], [Order No. 23AQ-E053, Approval Condition 7.c]

1.7 Duty to Comply

The permittee must comply with all conditions of this chapter 173-401 operating permit. Any permit noncompliance constitutes a violation of chapter 70A.15 RCW and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.

[WAC 173-401-620(2)(a)], [Order No. 20AQ-E032, Approval Condition 7.i, j]

1.8 Duty to Provide Information

The permittee must furnish to Ecology, within a reasonable time, any information that Ecology may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to Ecology copies of records required to be kept by this permit or, for information claimed to be confidential, the permittee may furnish such records directly to Ecology along with a claim of confidentiality. Ecology will maintain confidentiality of such information in accordance with RCW 70A.15.2510.

No person will make any false material statement, representation, or certification in any form, notice, or required report. No person will render inaccurate any required monitoring device or method.

[WAC 173-401-620(2)(e)], [WAC 173-400-105(7), (8)]

1.9 Duty to Supplement or Correct Application

The permittee, upon becoming aware that any relevant facts were omitted, or incorrect information was submitted in the permit application, must promptly submit such supplementary facts or corrected information. The permittee must also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

[WAC 173-401-500(6)]

1.10 Need to Halt or Reduce Activity not a Defense

It will not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

[WAC 173-401-620(2)(b)]

1.11 Excess Emissions Due to an Emergency

The permittee may seek to establish that noncompliance with a technology-based¹ emission limitation under this permit was due to an emergency.² To do so, the permittee must demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that:

1.11.1 An emergency occurred and that the permittee can identify the cause(s) of the emergency,

1.11.2 The permitted facility was being properly operated at the time of the emergency,

1.11.3 During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in this permit, and

1.11.4 The permittee submitted notice of the emergency to Ecology within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. The notice must be directed to appropriate air quality personnel at Ecology's Eastern Region Office using the most recent contact information.

[WAC 173-401-645]

¹ Technology-based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes (e.g., a new source performance standard) rather than those established to attain a health-based air quality standard.

² An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of this source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes this source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency will not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

1.12 Unavoidable Excess Emissions

1.12.1 WAC 173-400-108 (State-only requirement not federally enforceable)

1.12.1.1 Notify the permitting authority.

1.12.1.1.1 When excess emissions represent a potential threat to human health or safety, the owner or operator must notify the permitting authority by phone or electronic means as soon as possible, but not later than 12 hours after the excess emissions were discovered.

1.12.1.1.2 For all other excess emissions, the owner or operator must notify the permitting authority in a report as provided in 1.12.3.2.

1.12.1.2 Report – The owner or operator must report all excess emissions to the permitting authority.

1.12.1.2.1 To claim emissions as unavoidable under WAC 173-400-109, the report must contain the information in 1.12.3.2.3.

1.12.1.2.2 Chapter 173-401 WAC source: As provided in WAC 173-401-615(3) and 1.12.3.2.3.

1.12.1.2.3 For an excess emission event that the owner or operator claims was unavoidable under WAC 173-400-109, the report must also include the following information:

1.12.1.2.3.1 Properly signed contemporaneous records or other relevant evidence documenting the owner or operator's actions in response to the excess emissions event.

1.12.1.2.3.2 Information on whether installed emission monitoring and pollution control systems were operating at the time of the exceedance. If either or both systems were not operating, information on the cause and duration of the outage.

1.12.1.2.3.3 All additional information required under WAC 173-400-109(5) supporting the claim that the excess emissions were unavoidable.

[WAC 173-400-108]

1.12.2 WAC 173-400-109 (State-only requirement not federally enforceable)

1.12.2.1 Excess emissions determined to be unavoidable under the procedures and criteria in this section are violations of the applicable statute, rule, permit, or regulatory order.

- 1.12.2.1.1** The permitting authority determines whether excess emissions are unavoidable based on the information supplied by the source and the criteria in 1.12.4.5.
- 1.12.2.1.2** Excess emissions determined by the permitting authority to be unavoidable are:
 - 1.12.2.1.2.1** A violation subject to WAC 173-400-230 (3), (4) and (6).
 - 1.12.2.1.2.2** Not subject to civil penalty under WAC 173-400-230(2).
- 1.12.2.2** The permittee will have the burden of proving to the permitting authority in an enforcement action that excess emissions were unavoidable. This demonstration must be a condition to obtaining relief under 1.12.4.5.
- 1.12.2.3** This section does not apply to an exceedance of an emission standard in 40 CFR Parts 60, 61, 62, 63, and 72, or a permitting authority's adoption by reference of these federal standards.
- 1.12.2.4** Excess emissions that occur due to an upset or malfunction during a startup or shutdown event are treated as an upset or malfunction under 1.12.4.5.
- 1.12.2.5** Excess emissions due to an upset or malfunction will be considered unavoidable provided the permittee reports as required by WAC 173-400-108 and adequately demonstrates to the permitting authority that:
 - 1.12.2.5.1** The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition.
 - 1.12.2.5.2** The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance.
 - 1.12.2.5.3** When the operator knew or should have known that an emission standard or other permit condition was being exceeded, the operator took immediate and appropriate corrective action in a manner consistent with safety and good air pollution control practice for minimizing emissions during the event, taking in to account the total emissions impact of the corrective action. Actions taken could include slowing or shutting down the emission unit as necessary to minimize emissions.
 - 1.12.2.5.4** If the emitting equipment could not be shut down during the malfunction or upset to prevent the loss of life, prevent personal injury or severe property damage, or to minimize overall emissions, repairs were made in an expeditious fashion.
 - 1.12.2.5.5** All emission monitoring systems and pollution control systems were kept operating to the extent possible unless their shutdown

was necessary to prevent loss of life, personal injury, or severe property damage.

1.12.2.5.6 The amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent possible.

1.12.2.5.7 All practicable steps were taken to minimize the impact of the excess emissions on ambient air quality.

[WAC 173-400-109]

1.13 Reporting

1.13.1 Monthly Deviation Reports

The permittee must report all deviations from permit conditions and must include the following information: the time the deviation occurred, the duration of the deviation, the magnitude of the deviation in relation to the applicable limit, the probable cause of the deviation, and any corrective actions or preventive measures taken. Deviations must be reported to Ecology at the address included in this permit.

1.13.1.1 Deviations which represent a potential threat to human health or safety, or which the permittee believes to be unavoidable (1.12) must be reported as soon as possible, but in no case later than 12 hours after the deviation is discovered.

1.13.1.2 Excess emissions due to emergency (1.11), or which the source believes unavoidable (1.12), and does not meet the criteria 1.13.1.1, must be reported within two working days of the event.

1.13.1.3 All other deviations must be reported no later than 30 days after the end of the month during which the deviation is discovered.

1.13.1.4 For any month during which no permit deviations are discovered, the permittee must submit a report no later than 30 days following the end of the month stating that no deviations were observed during that period.

Upon request by Ecology, the permittee must submit a full written report including further details regarding the known causes, the corrective actions taken, and the preventative measures taken to minimize or eliminate the chance of recurrence. The source must maintain a contemporaneous record of all deviations. Responsible official certification in accordance with Condition 1.13.5 of monthly deviation reports must be included in each semi-annual monitoring report covering all deviations reported during the previous six-month period.

[WAC 173-401-615(3)(b)]

1.13.2 Semi-Annual Monitoring Reports

The permittee must submit reports of any required monitoring (i.e., Monitoring Recordkeeping and Reporting identified in section 3) at least once every six months. Six-

month periods will be from January 1st through June 30th, and from July 1st through December 31st.

- 1.13.2.1 Semi-annual monitoring reports will be due no later than forty-five (45) days following the end of each six-month period.
- 1.13.2.2 All instances of deviations from permit requirements must be clearly identified in such reports.
- 1.13.2.3 The report must include identification of all months during which no deviations occurred.
- 1.13.2.4 All required reports must be certified by a responsible official consistent with Condition 1.13.6.

[WAC 173-401-615(3)(a)]

1.13.3 Compliance Certifications

The permittee must submit a certification of compliance with permit terms and conditions at least once per calendar year. Certifications must be submitted no later than 45 days following the end of the certification period (calendar year). Ecology may require that compliance certifications be submitted more frequently for those emission units not in compliance with permit terms and conditions, or where more frequent certification is specified in the applicable requirement.

[WAC 173-401-630(5)(a)], [WAC 173-401-630(1)]

1.13.3.1 The certification must describe and include the following:

- 1.13.3.1.1** The permit term or condition that is the basis of the certification,
- 1.13.3.1.2** The current compliance status,
- 1.13.3.1.3** Whether compliance was continuous or intermittent, and
- 1.13.3.1.4** The methods used for determining compliance, currently and over the reporting period, consistent with WAC 173-401-615(3)(a).

[WAC 173-401-630(5)(c)]

- 1.13.3.2 All compliance certifications must be submitted to Ecology and EPA Region 10 at the respective addresses included in this permit.
- 1.13.3.3 [WAC 173-401-630(5)(d)]
- 1.13.3.4 The permittee need not certify compliance for insignificant emission units or activities if there is no permit requirement for testing, monitoring, recordkeeping or reporting.
- 1.13.3.5 [WAC 173-401-530(2)(d)]
- 1.13.3.6 All compliance certifications must include certification by a responsible official in accordance with Condition 1.13.6.

1.13.3.7 For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any requirement of this permit, nothing will preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test had been performed.

[40 CFR 52.33(a)], [40 CFR 60.11(g)]

1.13.4 Emissions Inventory

The permittee must submit an inventory of actual emissions from the source for each calendar year. The inventory must include segmented stack and fugitive emissions of TSP, PM-10, SO₂, CO, NO_x, lead, and VOC's, and must be submitted no later than **April 15th** of the following year. The source must maintain records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards. Emissions inventories must be sent to Ecology at the address included in this permit.

[WAC 173-400-105(1)]

1.13.5 Greenhouse Gas Reporting

If the permittee emits 10,000 metric tons of greenhouse gases (GHGs) or more per calendar year, GHGs are required to be reported to Ecology. (Note: WAC 173-441-030(5) details reporting requirements for facilities which are subject to the requirements but fall below reporting thresholds). All requests, notifications, and communications to Ecology regarding GHGs, other than submittal of the annual GHG report, must be submitted to:

Greenhouse Gas Report
Air Quality Program
Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Annual GHG reports must be submitted through Ecology's GHG Reporting webpage.

Reports must meet the requirements of WAC 173-441-050 and include the annual emissions of the GHGs listed in WAC 173-441-040 from source categories listed in WAC 173-441-120. The annual GHG report must be submitted electronically in accordance with WAC 173-441-050 and WAC 173-441-060, in a format specified by Ecology. The GHG report is due to Ecology by March 31st of each year for the previous calendar year.

If the facility emits 10,000 metric tons of GHGs or more per calendar year, the permittee must develop a written GHG monitoring plan. The plan must be revised, as needed, to reflect changes in processes, monitoring instruction, and quality assurance procedures; or to improve procedures for the maintenance and repair of monitoring systems to reduce the frequency of monitoring equipment downtime.

[WAC 173-441]

1.13.6 Submittals

Reports, test data, monitoring data, notifications, certifications, and applications (including requests for renewal) must be submitted to Ecology at the address included in this permit. Ecology may specify a different or additional submittal format in accordance with WAC 173-400-105(1), such as electronic submittal(s). Any application form, report, or compliance certification submitted to Ecology pursuant to this permit must contain certification of truth, accuracy, and completeness by a responsible official. All certifications must state that *“based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete”*. The permittee must promptly, upon discovery, report to Ecology any material error or omission in these records, reports, plans or other documents.

[WAC 173-401-520], [WAC 173-401-500(6)]

1.14 Severability

If any provision of this permit, or application of any provision of this permit, is held to be invalid, all unaffected provisions of the permit will remain in effect and be enforceable.

[WAC 173-401-620(2)(h)], [RCW 70A.15.9004]

1.15 Administrative Permit Amendments

1.15.1 An administrative permit amendment is a permit revision that:

- 1.15.1.1 Corrects typographical errors within the permit,
- 1.15.1.2 Identifies a change in the name, address, or phone number of any person identified in the permit, or provides for a similar minor administrative change at the source,
- 1.15.1.3 Requires more frequent monitoring or reporting by the permittee,
- 1.15.1.4 Allows for a change in ownership or operational control of a source where the permitting authority has determined that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to Ecology,
- 1.15.1.5 Incorporates into the permit the terms, conditions, and provisions from orders approving notice of construction applications processed under an EPA-approved program, provided that such a program meets procedural requirements substantially equivalent to the requirements of WAC 173-401-700, 173-401-725, and 173-401-800 that would be applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in WAC 173-401-600 through 173-401-650.

1.15.2 The source may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.

1.15.3 The permitting authority will, upon taking final action granting a request for an administrative permit amendment, allow coverage by the permit shield in WAC 173-401-640 for administrative permit amendments made pursuant to condition 1.15.1.5 above.

[WAC 173-401-720]

1.16 Permit Actions

This operating permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

[WAC 173-401-620(2)(c)]

1.17 Reopening for Cause

1.17.1 Ecology will reopen and revise this permit as necessary to remedy deficiencies in the following circumstances:

1.17.1.1 Additional requirements under the FCAA become applicable to a major source three or more years prior to the expiration date of this permit. Such a reopening must be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j).

1.17.1.2 Ecology or the Administrator determines that this permit contains a material mistake, or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.

1.17.1.3 Ecology or the Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

1.17.2 Proceedings to reopen and issue this permit will follow the same procedures as apply to initial permit issuance and will affect only those parts of this permit for which cause to re-open exists. Such reopening must be made as expeditiously as practicable.

1.17.3 Re-openings must not be initiated before a notice of intent to reopen is provided to the permittee by Ecology at least 30 days in advance of the date that this permit is to be reopened, except that Ecology may provide a shorter period of time in the case of an emergency.

1.17.4 All permit conditions remain in effect until such time as Ecology takes final action.

[WAC 173-401-730]

1.18 Off-Permit Changes

The permittee is allowed to make certain changes that are not specifically addressed or prohibited by this permit without a permit revision. All such changes must meet the following conditions:

- 1.18.1 The proposed changes must not weaken the enforceability of any existing permit condition.
- 1.18.2 Each such change must meet all applicable requirements and must not violate any existing permit term or condition.
- 1.18.3 Before or contemporaneously with making the permit change, the permittee must provide written notice to Ecology and EPA Region 10 at the respective addresses included in this permit. Such written notice must describe each such change, including the date, any change in emissions or pollutants emitted, and any applicable requirements that would apply as a result of the change.
- 1.18.4 The change must not qualify for the permit shield under Condition 1.1.
- 1.18.5 The permittee must keep a record of all changes that result in emissions of any regulated air pollutant subject to any applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes. The record must reside at the permitted facility.
- 1.18.6 A source making a change under this section must comply with the preconstruction review requirements established pursuant to Condition 1.20.

[WAC 173-401-724]

1.19 Changes not Requiring Permit Revisions

1.19.1 Section 502(b)(10) changes

The permittee is authorized to make section 502(b)(10) changes, as defined in WAC 173-401-200(30), without a permit revision, providing the conditions included below are met. The permit shield as described in Condition 1.1 will not apply to any change made pursuant to this paragraph.

- 1.19.1.1 The proposed changes are not Title I (FCAA) modifications.
- 1.19.1.2 The proposed changes do not result in emissions which exceed those allowable under the permit, whether expressed as a rate of emissions, or in total emissions.
- 1.19.1.3 The proposed changes do not alter permit terms that are necessary to enforce limitation on emissions from units covered by the permit.
- 1.19.1.4 The facility provides Ecology and EPA with written notification at least seven days prior to making the proposed changes except that written notification of a change made in response to an emergency must be provided as soon as possible after the event.

1.19.1.4.1 The written notification must include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

1.19.2 Changes related to Emissions trading under an emissions cap

Pursuant to Condition 1.19.1, the permittee is authorized to trade increases and decreases in emission in the permitted facility, where the Washington state implementation plan provides for such emissions trades without requiring a permit revision. This provision is available in those cases where the permit does not already provide for such emissions trading. Such changes will be subject to the following:

- 1.19.2.1 The written notification required under Condition 1.19.1.4 must include such information as may be required by the provision in the Washington SIP authorizing the emissions trade, including at a minimum, when the proposed change will occur, a description of each such change, any change in emissions, the permit requirements with which the source will comply using the emissions trading provisions of the Washington SIP, and the pollutants emitted subject to the emissions trade. The notice must also refer to the provisions with which the source will comply in the applicable implementation plan and that provide for the emissions trade. The notification must state how any increases or decreases in emissions will comply with the terms and conditions of the permit. (The permit shield described under Condition 1.1 will extend to terms and conditions that allow such increases and decreases.)
- 1.19.2.2 The permit shield described in Condition 1.1 will not extend to any change made under this paragraph. Compliance with the permit requirements that the source will meet using the emissions trade will be determined according to requirements of the applicable implementation plan authorizing the emissions trade.
- 1.19.2.3 Upon the request of the permit applicant, Ecology will issue permits that contain terms and conditions, including all terms required under WAC 173-401-600 through 173-401-630 to determine compliance, allowing for the trading of emissions increases and decreases in the chapter 173-401 WAC source solely for the purpose of complying with a federally enforceable emissions cap that is established in the permit independent of otherwise applicable requirements. The permit applicant must include in its application proposed replicable procedures and permit terms that ensure the emissions trades are quantifiable and enforceable. The emissions trading provision will not be applied to any emissions units for which emissions are not quantifiable or for which there are no replicable procedures to enforce the emissions trades. The permit will also require compliance with all applicable requirements.
- 1.19.2.4 A source making a change under this section must comply with applicable preconstruction review requirements established pursuant to Condition 1.20.
- 1.19.2.5 No permit revision will be required, under any approved economic incentives, marketable permits, and other similar programs or processes for changes that are provided for in this permit, such as emissions trading.

[WAC 173-401-722], [WAC 173-401-620(2)(g)]

1.20 New Source Review

The permittee must not construct new sources or make modifications required to be reviewed under WAC 173-400-110, WAC 173-400-113, 173-400-720, or WAC 173-460 before the permittee obtains written final approval from Ecology in accordance with those regulations, pays the appropriate fees required by WAC 173-455-120, and pays the cost of public notice described in WAC 173-400-171.

[WAC 173-400-110], [WAC 173-400-113], [WAC 173-400-116], [WAC 173-400-171], [WAC 173-455-120], [WAC 173-400-720], [WAC 173-460], [RCW 70A.15.2210]

1.21 Replacement or Substantial Alteration of Emission Control Technology

Prior to replacing or substantially altering emission control technology subject to review under WAC 173-400-114, the permittee must file for and obtain approval from Ecology according to that regulation. The permittee must pay the appropriate fees required by WAC 173-455-100(4)(a) prior to commencing construction.

[WAC 173-455-100], [WAC 173-400-114], [RCW 70A.15.2220]

1.22 Operational Flexibility

1.22.1 In the event that an emission unit is not operated during a period equal to or greater than the monitoring period designated, no monitoring is required. Recordkeeping and reporting must note the reason why and length of time that the emission unit was not operated.

1.22.2 The permittee did not propose any further alternative operating scenarios.

[WAC 173-401-650]

1.23 Permit Appeals

Your right to appeal

You have a right to appeal this permit or any conditions in it to the Pollution Control Hearings Board (PCHB) within 30 days of the date of receipt. The appeal process is governed by RCW 43.21B and WAC 371-08. "Date of receipt" is defined in Chapter 43.21B.001(2) RC.

To appeal you must do all of the following within 30 days of the date of receipt of this permit:

- File your notice of appeal and a copy of this permit with the PCHB (see filing information below). "Filing" means actual receipt by the PCHB during regular business hours as defined in Chapter 371-08-305 WAC and -335. "Notice of appeal" is defined in Chapter 371-08-340 WA.
- Serve a copy of your notice of appeal and this permit on the Department of Ecology by mail, in person, or by email (see addresses below).

You must also comply with other applicable requirements in Chapter 43.21B RCW and 371-08 WA.

Address and Location Information

Filing with the PCHB

For the most current information regarding filing with the PCHB, visit: <https://eluho.wa.gov/> or call: 360-664-9160.

Service on Ecology

Street Addresses:

Department of Ecology
Attn: Appeals Processing Desk
300 Desmond Drive SE
Lacey, WA 98503

Mailing Addresses:

Department of Ecology
Attn: Appeals Processing Desk
PO Box 47608
Olympia, WA 98504-7608

E-Mail Address:

ecologyappeals@ecy.wa.gov

[WAC 173-401-620(2)(i)]

1.24 Federal Chlorofluorocarbons (CFC) Requirements – Title VI of the FCAA

1.24.1 The permittee must comply with the following standards for recycling and emissions reductions pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in subpart B.

- 1.24.1.1 Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- 1.24.1.2 Equipment used during the maintenance, service, repair, or disposal must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- 1.24.1.3 Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
- 1.24.1.4 Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. (“MVAC-like appliance” is defined at 40 CFR 82.152.)
- 1.24.1.5 Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156.

- 1.24.1.6 Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep servicing records documenting the date and type of service, as well as the quantity of refrigerant added. The owner/operator must keep records of refrigerant purchased and added to such appliances in cases where owners add their own refrigerant. Such records must indicate the date(s) when refrigerant is added pursuant to 40 CFR 82.166.
- 1.24.1.7 Persons conducting maintenance, service, repair, or disposal of appliances must follow the prohibitions pursuant to 40 CFR 82.154.
- 1.24.1.8 Person performing maintenance, service, repair, or disposal of appliances must certify to the Administrator that such person has acquired certified recovery of recycling equipment pursuant to 40 CFR 82.162.
- 1.24.2 If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR 82, Subpart A – Production and Consumption Controls.
- 1.24.3 If the permittee performs a service on motor (fleet) vehicles and when this service involves ozone depleting substance refrigerant in the MVAC, the permittee is subject to all applicable requirements as specified in 40 CFR 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.
- 1.24.4 The permittee will be allowed to switch from any ozone depleting substance to any alternative that is listed in the Significant New Alternative Program promulgated pursuant to 40 CFR 82, Subpart G – Significant New Alternative Policy Program.

[40 CFR 82], [RCW 70A.15.6410], [RCW 70A.15.6420]

1.25 Reasonably Available Control Technology (RACT)

Emission standards and other requirements contained in rules or regulatory orders in effect at the time of operating permit issuance or renewal will be considered RACT for the purpose of permit issuance or renewal. RACT determinations under section 8, chapter 252, Laws of 1993 must be incorporated into an operating permit as provided in WAC 173-401-730.

[WAC 173-401-605(3)], [RCW 70A.15.2230]

1.26 Compliance Schedules

The permittee must continue to comply with applicable requirements with which it is currently in compliance. The permittee must meet applicable requirements on a timely basis that become effective during the permit term.

[WAC 173-401-510(2)(h)(iii)(A)], [WAC 173-401-510(2)(h)(iii)(B)]

1.27 Record Keeping

1.27.1 The permittee must keep records of required monitoring information that includes, where applicable, the following:

- 1.27.1.1 The date, place, and time of the sampling or measurements.

- 1.27.1.2 The date(s) analyses were performed.
- 1.27.1.3 The company or entity that performed the analyses.
- 1.27.1.4 The analytical techniques or methods used.
- 1.27.1.5 The results of such analyses.
- 1.27.1.6 The operating conditions as existing at the time of sampling or measurement.

[WAC 173-401-615(2)(a)]

- 1.27.2 The permittee must keep records describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

[WAC 173-401-615(2)(b)]

- 1.27.3 The permittee must retain records of all required monitoring data and support information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings from continuous monitoring instrumentation, and copies of all reports required by this permit.

[WAC 173-401-615(2)(c)]

- 1.27.4 All required recordkeeping must be available to Ecology in accordance with Condition 1.6.

[WAC 173-401-630(2)(b)]

1.28 General Obligation

Nothing in this permit will alter or affect the following:

- 1.28.1 The provisions of section 303 of the FCAA (emergency orders), including the authority of EPA under that section.
- 1.28.2 The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance.
- 1.28.3 The applicable requirements of the acid rain program, consistent with section 408(a) of the FCAA.
- 1.28.4 The ability of EPA to obtain information from a source pursuant to section 114 of the FCAA.
- 1.28.5 The ability of Ecology to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in chapter 252, Laws of 1993.

[WAC 173-401-640(4)]

1.29 Permit Renewal and Expiration

This permit is issued for a fixed term of five years. The permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application

(as outlined in WAC 173-401-510) is submitted at least 12 months, but no greater than 18 months prior to the date of permit expiration.

A complete renewal application is due no later than DATE, 2028.

Upon receipt of a timely and complete application for renewal, this source may continue to operate subject to final action by Ecology on the renewal application. This allowance will cease to apply if, subsequent to a completeness determination, the applicant fails to submit by the deadline specified in writing by Ecology, any additional information identified as being needed to process the application. The application must be sent to Ecology at the address included in this permit.

[WAC 173-401-610; 173-401-710]

1.30 Demolition and Renovation (asbestos)

Prior to, during and after conducting any activity to which 40 CFR 61, Subpart M – National Emission Standard for Asbestos, applies, the permittee must comply with the requirements of that rule. Such activities include notification, demolition, renovation, asbestos stripping or removal, installing or reinstalling insulation, manufacturing of certain items, spraying of certain materials, constructing roadways of certain materials, or disposal.

[40 CFR 61, Subpart M], [WAC 173-400-075(1)]

2.0 Applicable Requirements

Until this permit expires, is modified, or revoked, this permittee is authorized to operate the air emission units and processes outlined in Sections 2.1 through 2.8. These emission units and processes are subject to the conditions included in Sections 2.1, through 2.8, to the MRRR's listed in Section 3, and to other terms and conditions specified in this permit.

The column entitled **Description** in each table contains only a summary/paraphrase of the condition, emission standard or work practice. The condition, emission standard, or work practice itself is the enforceable requirement and must be referenced for actual language.

Testing Requirements

Although there are many conditions with no on-going testing requirements, Ecology retains the authority to conduct or require that testing be conducted at the facility with respect to these conditions per WAC 173-400-105(4). Identification of the appropriate test method is necessary to make emission limits fully enforceable. Where the underlying applicable requirement does not specify the test method, Ecology has done so in this permit.

[WAC 173-401-615(1)(a)], [WAC 173-401-630(1)], [WAC 173-400-105(4)]

2.1 Facility Wide

This section is applicable and enforceable with respect to all emission units source wide, including those emission units in Sections 2.2 through 2.8. Monitoring, recordkeeping, and reporting requirements in this section do not apply to insignificant emission units. Condition numbers denoted with an asterisk indicate that streamlining of a less stringent requirement has taken place and is described in section 15.0 of the Statement of Basis.

TABLE 2.1 Applicable and Enforceable Requirements for All Emission Units

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.1.1	WAC 173-400-040(2)	S	Visible emissions (except those due to the presence of uncombined water) must not exceed 20 percent opacity for more than three minutes in any one hour.	RM 9	2M
2.1.2	WAC 173-400-060	F	General process units are required to meet all applicable provisions of WAC 173-400-040 and emissions of particulate material from any operation must not exceed 0.1 grain/dscf of exhaust gas.	RM 5	4M
2.1.3	WAC 173-400-040(3)	S	Particulate matter must not be deposited beyond the property line in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited.	None	1M
2.1.4	WAC 173-400-040(4)(a)	S	Fugitive dust control measures must be taken to prevent fugitive emissions.	None	3M
2.1.5	WAC 173-400-040(9)(a)	F	The source must take reasonable precautions to prevent fugitive dust from becoming airborne and must maintain and operate the source to minimize emissions.	None	3M
2.1.6	WAC 173-400-040(5)	S	Any producer of an odor which may unreasonably interfere with any other property owner's use and enjoyment of his property must reduce these odors to a reasonable minimum.	None	1M
2.1.7	WAC 173-400-040(6)	F	No person must cause or allow the emission of any air contaminant if it is detrimental to the health, safety, or	None	1M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			welfare of any person, or causes damage to property or business.		
2.1.8	WAC 173-400-040(8)	F	No person must conceal or mask an emission of an air contaminant	None	None
2.1.9	WAC 173-400-200(2)	F	No source may use dispersion techniques or excess stack height to meet ambient air quality standards or PSD increment limitations.	None	None
2.1.10	WAC 173-400-205	F	Varying the rate of emission of a pollutant according to atmospheric conditions is prohibited, except as directed according to air pollution episode regulations.	None	None
2.1.11	RCW 70A.15.1070	S	Causing air pollution in violation of Chapter 70A.15 RCW is unlawful	None	None
2.1.12	Order No. 23AQ-E053, Condition 7.H WAC 173-425	F	Open burning is subject to restrictions.	None	None
2.1.13	WAC 173-400-040(1)(c)	F	All emissions units are required to use RACT.	None	None
2.1.14	WAC 173-400-040(7)	F	SO ₂ ≤ 1000 ppm, dry basis (corrected to 7 percent O ₂ for combustion sources) for 60 consecutive minutes.	RM6	5M

2.2 Cyclone (C-2) and Baghouses (BH-1, BH-2):

TABLE 2.2

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.2.1	Order 19AQ-E058, Approval Condition 2.A.	F	Total annual plywood production must not exceed 280,000,000 square feet of 3/8" plywood.	None	6M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.2.2	Order 19AQ-E058, Approval Condition 3.A.	F	Opacity from the cyclone exhaust must be less than 10 percent over a six-minute interval.	RM9	2M
2.2.3	Order No. 19AQ-E058, Approval Condition 3.B.	F	Opacity from the baghouse exhaust must be less than 5 percent over a six-minute interval.	RM 9	2M
2.2.4	Order No. 19AQ-E058, Approval Condition 3.C.	F	PM emissions from the baghouse exhaust must not exceed 0.005 gr/dscf.	RM 5 / RM 202	4M
2.2.5	Order No. 19AQ-E058, Approval Condition 3.D.	F	Mass emission rate of PM10 must not exceed 1.5 pounds per hour in the exhaust of fabric filter BH-1	RM 5 / RM 202	4M
2.2.6	Order No. 19AQ-E058, Approval Condition 3.E.	F	Mass emission rate of PM10 must not exceed 1.6 pounds per hour in the exhaust of fabric filter BH-2	RM 5 / RM 202	4M
2.2.7	Order No. 19AQ-E058, Approval Condition 5.	F	O&M manual must be reviewed annually and updated to reflect any modifications of the plant or operating procedures.	None	7M
2.2.8	Order No. 19AQ-E058, Approval Condition 6.A.	F	The fabric filters (BH-1, BH-2) must be equipped with magnehelic pressure differential gauges to indicate pressure drop across the filters (or other manufacturer's recommended filter failure monitoring equipment). Indications of filter failure (the gauges) must be in a place readily accessible to equipment operators (e.g. at the unit or a control room).	None	None
2.2.9	Order No. 19AQ-E058, Approval Condition 9.A.	F	The cyclones and fabric filters material catch	None	None

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			systems must be routed through rotary air locks to a blow tube, which then can be directed to either the truck bins or the boiler fuel silo. There must be no visible emissions from the cyclone or fabric filter catch systems.		
2.2.10	Order No. 19AQ-E058, Approval Condition 10.A.	F	No visible emissions must be allowed beyond the property line.	RM22	4M
2.2.11	Order No. 19AQ-E058, Approval Condition 10.B.	F	Order void if operation is discontinued for eighteen (18) months.	None	None
2.2.12	Order No. 19AQ-E058, Approval Condition 10.D.	F	Legible copies of Order 19AQ-E058 and the O&M manual must be available to employees in direct operation of the facility and be available for review upon request by Ecology.	None	None
2.2.13	Order No. 19AQ-E058, Approval Condition 10.E.	F	All equipment must be operated in accordance with the information contained within the NOC application, O&M manual and manufacturer's instructions unless otherwise approved in writing by Ecology.	None	3M

2.3 Veneer Dryers No. 2 and No. 3

TABLE 2.3

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.3.1	Order No. 23AQ-E053 Approval Condition 2.i.	F	No visible emissions are allowed beyond the property line.	RM22	4M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.3.2	Order No. 23AQ-E053 Approval Condition 1.g.	F	Total plant dryer production is limited to 280,000,000 square feet of 3/8" plywood per year.	None	8M
2.3.3	Order No. 23AQ-E053 Approval Condition 1.i.	F	Exceeding production cap may require a notice of construction. Any modification of plant or operating procedures must be reported to Ecology.	None	None
2.3.4	Order No. 23AQ-E053 Approval Condition 1.j.	F	No leaks or losses of PM, dryer combustion gases and organic compounds during normal steady state operations.	None	25M
2.3.5	Order No. 23AQ-E053 Approval Condition 3.b.	F	Site specific O&M manuals for all equipment with potential to affect emissions must be maintained and followed. Manuals must be updated to reflect modifications of plant or operating procedures.	None	9M
2.3.6	Order No. 23AQ-E053 Approval Condition 7.b.	F	Legible copies of the approval order and the O&M manual must be in the working vicinity and available to the employees in direct operation of the dryers and emission control systems.	None	None
2.3.7	Order No. 23AQ-E053 Approval Condition 7.e.	F	The facility must be constructed according to the information and specifications submitted as part of the NOC application. The facility must be operated in accordance with manufacturer's instructions and the O&M manual, unless otherwise	None	3M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			approved in writing by Ecology.		

2.4 Fluid Bed Combustor

TABLE 2.4

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.4.1	Order No. 23AQ-E053, Approval Condition 2.f.	S	Opacity from the control device stack must not exceed 10 percent for more than six minutes in any hour.	RM 9	2M
2.4.2*	Order No. PSD-X80-01 First Amendment, Approval Condition 1	F	Emissions of particulate matter from the FBC stack must not exceed 0.04 gr/dscf.	RM 5	11M, 12M
2.4.3	Order No. 23AQ-E053, Approval Condition 2.d.	S	Emissions of filterable particulate matter from the ESP/RTCO stack ≤ 4.0 lb/hr (3-hour average).	RM 5	11M, 12M
2.4.4	Order No. PSD-X80-01 First Amendment, Approval Condition 1	F	Annual emissions of particulate matter from the FBC/veneer dryer must not exceed 186 tons.	RM 5	11M
2.4.5	Order No. 23AQ-E053, Approval Condition 2.a.	S	NOx emissions ≤ 123 tons in any 12 consecutive months.	RM 7 or 7A	11M
2.4.6	Order No. 23AQ-E053, Approval Condition 2.b.i.	S	In catalytic mode, CO emissions at the RTCO outlet must not exceed 10% by mass of CO measured at the RTCO inlet (average of three one-hour test runs).	RM 10	11M
2.4.7	Order No. 23AQ-E053, Approval Condition 2.b.ii.	S	In thermal mode, the CO emission limit must be based on the average of three source test runs from the initial test on the RTCO stack. The CO	RM 10	11M

			emissions limit will be based on the operation of the RTCO at the temperature at which 90% VOC destruction is achieved. Following the initial performance test, compliance with the limit must be based on the average of three one-hour runs from any required stack test.		
2.4.8	Order No. 23AQ-E053, Approval Condition 2.c.	S	VOC emissions \leq 2.83 lb/hr as carbon (average of three one-hour test runs).	RM 25A	11M
2.4.9	Order No. 23AQ-E053, Approval Condition 2.c.i.	S	VOC emissions at the RTCO outlet must not exceed 10 percent by mass of the VOC emissions at the RTCO inlet (average of three one-hour test runs).	RM 25A	11M
2.4.10	Order No. 23AQ-E053, Approval Condition 2.e.	S	SO ₂ emissions from RCTO stack \leq 8,480 lb in any 12 consecutive months based on the average of three one-hour test runs from the most recent stack test.	RM6	5M, 11M
2.4.11	Order No. 23AQ-E053, Approval Condition 1.b.	S	Natural gas must be the only fuel used by the RTCO and ESP preheater.	None	None
2.4.12	Order No. 23AQ-E053, Approval Condition 1.e.	S	RTCO must not be operated at temperature $>$ 1,900oF (3-hour average) at any time.	None	20M, 21M
2.4.13	Order No. 23AQ-E053, Approval Condition 3	S	Prepare and update RTCO, ESP and ESP preheater O&M Manuals.	None	10M
2.4.14	40 CFR 64.7(b)	F	The permittee must maintain the monitoring equipment specified in MRRR 11M, including but	None	12M

			not limited to, maintaining necessary parts for routine repairs of the equipment.		
2.4.15	Order No. PSD-X80-01 First Amendment, Approval Condition 5	F	All equipment must be operated in accordance with the information contained within the PSD application.	None	3M
2.4.16	Order No. 23AQ-E053, Approval Condition 7.b.	S	Copy of Order available to employees, and to Ecology upon request.	None	None
2.4.17	Order No. 23AQ-E053, Approval Condition 2.g.	S	Opacity from the abort stack must not exceed 10 percent (3-minute average) whenever the ESP preheater is in use. Opacity readings must be conducted whenever visible emissions are observed.	RM 9	2M
2.4.18	Order No. 23AQ-E053, Approval Condition 2.h.	S	Emissions from the abort stack must not exceed 0.1 grains/dscf.	RM 5	2M

2.5 Hogged Fuel Boiler and Electrified Filter Bed

TABLE 2.5

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.5.1*	Order No. 15AQ-E631, Approval Condition 2.1.2	F S	Opacity from the EFB stack must not exceed 10 percent for more than six minutes in one hour.	RM 9	2M
2.5.2	Order No. 15AQ-E631, Approval Condition 2.1.2	S	Opacity from the EFB stack must not exceed 10 percent on an hourly average as measured by COMS.	RM 9	15M
2.5.4*	Order No. 15AQ-E631, Approval Condition 2.1.1	S	Emissions of PM-10 must not exceed 0.030 gr/dscf at seven percent O2 and 19 tons/year.	RM 5	14M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.5.5	Order No. PSD-X80-01 First Amendment, Approval Condition 1	F	Emissions of particulate matter must not exceed 0.04 gr/dscf	RM 5	14M
2.5.6	Order No. PSD-X80-01 First Amendment, Approval Condition 1	F	Annual emissions of particulate matter must not exceed 196 tons.	RM 5	14M
2.5.7	WAC 173-400-070 (2) (b)	F S	All hogged fuel boilers must utilize RACT and must be operated and maintained to minimize emissions.	None	None
2.5.8	Order No. 15AQ-E631, Approval Condition 2.5	S	Hogged fuel boiler must not be operated above the following steaming rates: 40,000 lb/hr between 5/1 and 9/30; 45,000 lb/hr between 10/1 and 4/30.	None	13M
2.5.9	Order No. 15AQ-E631, Approval Condition 2.6	S	The hogged fuel boiler abort gate must be used only in specific emergency situations. The boiler must not be operated when exhaust gases bypass the EFB.	None	18M
2.5.10	Order No. 15AQ-E631, Approval Condition 2.7	S	The continuous oxygen monitoring system must be operated in accordance with the Q/A Plan.	None	13M, 16M
2.5.11	Order No. 15AQ-E631, Approval Condition 2.4	S	O&M manual must be followed. Copy of O&M manual and this permit must be kept in the boiler room and accessible to permittee and regulatory inspectors.	None	16M
2.5.12	40 CFR 64.7(b)	F	The permittee must maintain the monitoring equipment specified in MRRR 13M, including but not limited to, maintaining necessary parts for routine repairs of the equipment.	None	12M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.5.13	Order No. PSD-X80-01 First Amendment, Approval Condition 5	F	All equipment must be operated in accordance with the information contained within the PSD application.	None	3M

2.6 Cleaver Brooks CBEX Elite Natural Gas (NG) Boilers

TABLE 2.6

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.6.1	Order No. 15AQ-E631, Approval Conditions 3.1, 3.8.1	F S	Fueled by pipeline quality natural gas only.	None	29M
2.6.2	Order No. 15AQ-E631, Approval Condition 3.2	F S	Nitrogen oxide (NOx) emission must not exceed nine parts per million by volume (ppmv) at three percent O ₂ .	None	28M
2.6.3	Order No. 15AQ-E631, Approval Condition 3.3	S	Carbon monoxide (CO) emissions must not exceed 30 parts per million by volume (ppmv) at three percent O ₂ .	None	28M
2.6.4	Order No. 15AQ-E631, Approval Condition 3.4	F S	Opacity from the NG boiler stacks must not exceed five percent for more than six minutes in one hour.	RM 9	2M
2.6.5	Order No. 15AQ-E631, Approval Condition 3.5	S	O&M manual must be followed, kept updated, and easily accessible for inspection by Ecology personnel.	None	16M
2.6.6	Order No. 15AQ-E631, Approval Conditions 3.6, 3.8.2, 3.9	F S	Continuous compliance must be demonstrated by conducting a tune up every five years as specified in 40 CFR Part 63 Subpart DDDDD, §63.7540(a)(10)(i) through (vi).	None	28M, 29M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			Each burner must be inspected at least once every 72-months.		

Sections 2.7 and 2.8 of this permit are for the implementation of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Plywood and Composite Wood Products (PCWP), 40 CFR 63 Subpart DDDD, referred to as the PCWP MACT. Except where this permit is more restrictive, the permittee must comply with the requirements of 40 CFR 63 Subpart DDDD.

2.7 PCWP MACT: General Conditions

TABLE 2.7

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.7.1	40 CFR 63.2290	F	40 CFR 63, Subpart DDDD, Table 10 shows which parts of the General Provisions in §§63.1 through 63.13 apply to the permittee.	None	None
2.7.2*	40 CFR 63.2250(a)	F	The permittee must be in compliance with the compliance options, operating requirements, and the work practice requirements in this subpart at all times, except; prior to process unit initial startup; and during the routine control device maintenance exemption specified in §63.2251. The compliance options, operating requirements, and work practice requirements do not apply during times when the process unit(s) subject to the compliance options, operating requirements, and work practice requirements are not operating, or during periods	RM9	20M – 26M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			of startup, shutdown, and malfunction. Startup and shutdown periods must not exceed the minimum amount of time necessary for these events. Compliance determinations will be made using the methods in 40 CFR 63.6 (f)(2) & (3).		
2.7.3	40 CFR 63.2250(b)	F	The permittee must always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1).	None	26M
2.7.4*	40 CFR 63.2250(c)	F	The permittee must develop a written Startup, Shutdown, and Malfunction Plan (SSMP) according to the provisions in §63.6(e)(3).	None	26M

2.8 PCWP MACT Compliance Options, Operating Requirements and Work Practice Requirements

TABLE 2.8.1 Softwood Veneer Dryers
 The following apply to veneer dryers 1, 2, & 3

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.8.1.1	40 CFR 63.2240(b)	F	The permittee must use an emissions control system and demonstrate that the resulting emissions meet the compliance options in table 1B and the operating requirements in Table 2 of 40 CFR 63 Subpart DDDD. Initial compliance must be demonstrated according to 40 CFR 63 Subpart DDDD	25A	19M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			Table 5, using performance test methods in 40 CFR 63 Subpart DDDD, Table 4.		
2.8.1.2*	40 CFR 63, Subpart DDDD, Table 2(1), <i>Operating Requirements</i>	F	For thermal oxidizer, maintain the 3-hour block average firebox temperature above the minimum temperature established during the performance test.	None	20M, 21M
2.8.1.3	40 CFR 63.2251 (b), (d), (e)	F	The compliance options and operating requirements do not apply when thermal oxidizer maintenance covered under the routine control device maintenance exemption submitted on 8/7/2008 is performed. The routine control device maintenance exemption must not exceed 0.5 percent of annual uptime for the veneer dryers. The permittee must minimize, to the extent practical, startup and shutdown of the thermal oxidizer must be scheduled during times when the veneer dryers are also shut down.	None	21M, 23M
2.8.1.4*	40 CFR 63, Subpart DDDD, Table 2(2), <i>Operating Requirements</i>	F	For catalytic oxidizer, maintain the 3-hour block average catalytic oxidizer temperature above the minimum temperature established during the performance test.	None	20M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.8.1.5*	40 CFR 63, Subpart DDDD, Table 2(2), <i>Operating Requirements</i>	F	For catalytic oxidizer, check the activity level of a representative sample of the catalyst at least every 12 months, and take any necessary corrective action to ensure that the catalyst is performing within its design range.	None	21M
2.8.1.6	40 CFR 63, Subpart DDDD, Table 3, <i>Work Practice Requirements</i>	F	Minimize fugitive emissions from the dryer doors (through proper maintenance procedures) and the green end of the dryers (through proper balancing of the heated zone exhausts).	None	25M

TABLE 2.8.2 Group 1 Miscellaneous Coating Operations

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.8.2.1	40 CFR 63, Subpart DDDD, Table 3, <i>Work Practice Requirements</i>	F	Use non-HAP coatings as defined in §63.2292. HAP contents must be below 0.1 percent by mass for Occupational Safety and Health Administration-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and below 1.0 percent by mass for other HAP compounds.	None	24M

3.0 Monitoring, Recordkeeping, and Reporting Requirements (MRRR)

[WAC 173-401-630(1)], [WAC 173-401-615(1)(a), (b)]

Facility Wide

No MRR Required: No specific monitoring can reasonably be required for these requirements. The nature of the requirements makes it necessary to rely on the good faith of the permittee to conscientiously monitor site operations and to promptly report any deviations. No specific monitoring can reasonably be required for these conditions. The permittee is required to certify compliance with these conditions

annually. Determination of compliance may be based on a reasonable and good faith effort to identify any deviations during the reporting period.

1M. The permittee must maintain records of all complaints received. Ecology must be notified within three working days of receipt of any complaints. The permittee must address and respond to all complaints within three working days of receipt of the complaint. The recordkeeping must include the following with regard to the complaint and the associated deviation:

- 1) A record of all written complaints, complaints received by telephone, or complaints received in person.
- 2) Time, date, and duration of the deviation.
- 3) Cause of the deviation.
- 4) Estimate of excess emissions and magnitude of deviation.
- 5) Corrective action taken.
- 6) The results of the corrective action must be reported as part of the monthly deviation report.
[WAC 173-401-615(1)(b)] (This MRRR includes gap filling)

2M. The permittee must monitor opacity in accordance with the following:

- 1) At least monthly, or whenever excess visible emissions are observed, the permittee must observe points of visible and PM emissions from emission units and activities to which opacity and/or particulate standards apply. The survey must also be conducted when visible emissions are observed by facility personnel and reported to personnel responsible for environmental compliance. Facility personnel in general must be made aware of their responsibility to report visible emissions. Each survey must be performed as follows:
 - a) The survey must be conducted during daylight hours from a location with a clear view of the emission point and where the sun is as close as possible to being directly behind the observer. The observer's location must be at least 15 feet but not more than one quarter mile from the source.
 - b) The survey must be conducted while the facility process associated with the emission point is in operation.
 - c) The observer will be trained in the general procedures for determining the presence of visible emissions (i.e., effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, observer position relative to source and sun, and the presence of uncombined water).
 - d) The survey must consist of a minimum of a 15-second visual observation of each stack or emission point to identify any visible emissions other than those due to uncombined water.

- e) Records must be made of each observation, including at least: the emission points observed, the name of the observer, the date and time of the observation, the emission points observed, weather conditions and the presence or absence of visible emissions.
 - f) If visible emissions are observed to be zero, no further action is required.
 - g) If visible emissions are observed—as soon as possible, but no later than 24 hours after the observation, the permittee must verify and certify that:
 - i) The emissions are not the result of equipment malfunction, and the equipment from which the emissions are released is performing its normal, designed function.
 - ii) Air pollution control equipment, if any, is being operated in accordance with normal operating procedures.
 - iii) For fugitive emissions, reasonable precautions are being taken to minimize emissions.
 - h) If any of the above are not being met, corrective action must be taken as soon as possible, but no later than 72 hours from the initial observation.
 - i) If or when 1)g)i., ii., and iii. are being met:
 - i) If no visible emissions are observed, no further action is required.
 - ii) If visible emissions are observed, the permittee must within 24 hours, perform an RM 9 or Ecology Method 9A (whichever is applicable) test on the source of the emissions. Only personnel certified to perform RM9 in accordance with EPA guidelines must perform the test. Testing must consist of opacity readings at 15-second intervals over a minimum of six consecutive minutes (24 consecutive readings). If any reading exceeds the standard, observations must continue for a total of 60 minutes or until a violation is documented.
 - a. If visible emissions do not exceed the applicable standard, no further action is required.
 - b. If visible emissions exceed the applicable standard, the permittee must initiate appropriate corrective action to address the problem and prevent further violations within 24 hours.
 - c. Once corrective action has been taken, the permittee must perform, or have performed, an RM9 or Method 9A test to demonstrate a return to compliance. The results of the test must be submitted to Ecology within two working days of the test.
- 2.) Recordkeeping: The permittee must maintain the following records for at least five years:
- a) A list of all facility personnel trained per 1)c), and a list of all facility personnel with current RM9 certification.
 - b) For each exceedance of the opacity standard identified under 1)i)ii)b. above:

- i) The date and time the exceedance was identified.
- ii) A description of the exceedance.
- iii) A description of corrective action taken.
- iv) Copies of all RM9 observations documenting an exceedance or the re-establishment of normal operations.

3) Reporting: Reports of all opacity exceedances must be included in the monthly deviation report required by Standard Condition 1.13.1.

[WAC 173-401-615(1)(b), & (3)], [WAC 173-401-630(1)] (This MRRR includes gap filling)

3M. During the first period for which compliance is certified under this renewal AOP, the permittee must perform a review of the Operation and Maintenance manuals, permit application materials (Notice of Construction, PSD) and other relevant documents (Ash Handling and Disposal Plan, Fugitive Dust Control Plan) for the purpose of evaluating compliance with each condition for which this MRRR is referenced. The focus of this review must be to verify that plant operations are being conducted in accordance with the documents stated above and with good air pollution control practices in mind at the time of the initial review.

Subsequent annual reviews of plant operations must be conducted to verify that any changes made since the initial document review have not resulted in operations, which are inconsistent with the documents stated above or with good air pollution control practices.

The permittee must maintain records that include the date such reviews occur as well as the name of the person conducting the review. Upon discovery that any equipment is being operated in a manner inconsistent with any of the above-mentioned documents, the permittee must initiate corrective action within two business days. All such discoveries must be reported to Ecology as required by Standard Condition 1.13.1.3 of this permit.

[WAC 173-401-615(1)(b), (c)] (This MRRR includes gap filling)

4M. The following must apply generally, facility wide:

- 1) Monitoring: At least once per month, as well as any time visible emissions are observed, the permittee must perform opacity surveys of the facility during daylight hours. The surveys must be conducted while the facility is in operation, and where the sun is not directly in the observer's eyes. The survey must include observation for any visible emissions, including fugitive emissions.
 - a) Observer certification for plume evaluation is not required, but the observer will be trained in the general procedures for determining the presence of visible emissions (i.e., effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, observer position relative to source and sun, and the presence of uncombined water).
 - b) The survey must consist of a visual scan of the facility and the direct observation of each emission point or stack.

- c) If visible emissions are observed, the permittee must identify the source and verify that equipment is operating normally, and that reasonable precautions are being taken to control any fugitive dust. If equipment is not operating normally or reasonable precautions are not being taken to control fugitive dust, the permittee must take prompt corrective action.
- 2) Recordkeeping: Records of each survey must include the date, observer name, the weather, and identification of any points from which visible emissions were observed. The permittee must record any action taken under 1)c), including a description of any corrective action taken.
- 3) Reporting: Monthly deviation reports required by Standard Condition 1.13.1 must include a description of any visible emissions, and any corrective action taken under 2M 1)c).

[WAC 173-401-615(1), (2)] (This MRRR includes gap filling.)

- 5M.** The permittee must determine the sulfur content of fuels used, except that no determination is needed for hog fuel, natural gas, propane (LPG) or diesel fuel with less than two percent sulfur by weight. Information from fuel suppliers or generally published information on the sulfur content of other fuels may be referenced. Use of any fuel with sulfur content greater than two percent by weight may require a reference method source test during the use of that fuel. The permittee may certify compliance with Condition 2.1.14 if no fuels with sulfur content greater than two percent by weight are combusted.

[WAC 173-401-615(1)(b)] (This MRRR includes gap filling)

CYCLONE (C-2) AND BAGHOUSES (BH-1 AND BH-2)

- 6M.** The following monitoring, recordkeeping, and reporting must apply to cyclone C-2 and baghouses BH-1 & BH-2:

- 1) Recordkeeping must include:
 - a) Total annual plywood production on 3/8" basis.
 - b) Nature and details of any upset condition or complaint (date/time, duration, cause, corrective action).
 - c) Maintenance records for all repairs and preventative maintenance activities.

[Order 19AQ-E058, Approval Conditions 2 & 7]

- 7M.** The permittee must create, follow, and maintain O&M manuals for cyclone (C-2) and baghouses BH-1 and BH-2. The O&M manuals must be maintained in an up-to-date manner, well organized, and easily accessible for inspection by Ecology personnel. The O&M manual must be reviewed at least annually and updated within 30 days of any modifications to the baghouses or operating procedures. Emissions that result from failure to follow the requirements of the O&M manuals or manufacturer's instructions may be considered proof that the equipment was not properly operated, maintained, and tested. Manufacturer's information may be referenced rather than included in the manuals. The following minimum information must be included each manual:

- 1) Normal operating parameters for each fabric filter and cyclone.
- 2) Maintenance schedules for cyclones and filters.
- 3) Process monitoring instrumentation, operating specifications, and quality assurance/quality control (QA/QC) procedures.
- 4) Recordkeeping and reporting requirements.
- 5) Actions to take in the event of upset or abnormal operating conditions.
- 6) Bag failure records, which show the location of failed bags in relation to bag configuration, and date of replacement.

[Order 19AQ-E058, Approval Condition 5] (This MRRR includes gap filling)

VENEER DRYERS 2 and 3

8M. The following records must be maintained:

- 1) Total plywood production (expressed as 3/8 inch plywood equivalent).
- 2) Records of the operating rate of the FBC-veneer dryer system.

[Order No. 09AQ-E283, Approval Condition 2.2], [PSD-X80-01 First Amendment, Approval Condition 6a], [WAC 173-401-615(1)(b)]

9M. The permittee must create, follow, and maintain O&M manuals for veneer dryers No 2 and No. 3. The O&M manuals must be maintained in an up-to-date manner, well organized, and easily accessible for inspection by Ecology personnel. The O&M manual must be reviewed at least annually and updated within 30 days of any modifications to the veneer dryers or operating procedures. Manufacturer's instructions may be referenced. Emissions resulting from failure to follow the requirements of the O&M manuals or manufacturer's instructions may be considered proof that equipment was not properly operated, maintained and tested. Regular maintenance records must be kept at the facility. Manufacturer's instructions and maintenance records must be readily accessible, available upon request, and maintained for at least five years. O&M manuals must include, at a minimum:

- 1) Normal operating parameters for the dryer and emission control system.
- 2) A maintenance schedule for the dryer and emission control system.
- 3) A list of all monitoring and recordkeeping requirements that apply to dryers No. 2 and No. 3.
- 4) A description of any monitoring procedures that apply to dryers No. 2 and No. 3.
- 5) A description of actions to be taken in response to abnormal control system operation.

[Order No. 23AQ-E053, Approval Condition 3]

ESP/RTCO/ESP PREHEATER

10M. The permittee must prepare O&M manuals for the RTCO, ESP and ESP preheater. Manufacturers' instructions may be referenced. The O&M manual must be reviewed at least annually and updated within 30 days of any modifications to the RTCO, ESP, or operating procedures. Emissions that result from failure to follow the requirements of the O&M manual may be considered proof that the units were not properly operated, maintained, and tested. Regular maintenance records must be kept at the facility. The O&M manual and maintenance records must be available for inspection by Ecology, organized in a readily accessible manner, and retained for at least five years.

The O&M manual must at a minimum include:

- 1) Normal operating parameters for the RTCO and ESP.
- 2) Inspection and maintenance schedules for RTCO, ESP and ESP preheater.
- 3) Monitoring and recordkeeping requirements.
- 4) Actions for abnormal control system operation.
- 5) A description of startup and shutdown procedures.
- 6) If the RTCO is configured for catalytic operation, a description of catalyst conditions indicating catalyst failure.

[Order No. 23AQ-E053, Approval Condition 3]

11M.* The following testing, monitoring and recordkeeping apply to the FBC, RTCO, ESP and ESP preheater. Records must be kept for five years from the date of each occurrence, measurement, maintenance activity, or corrective action. Records must be organized and readily available for inspection.

- 1) Source testing:
 - a) The permittee conducted an initial performance test for NO_x, CO, VOC, PM and SO₂ with the oxidizer operating in thermal mode on March 5, 2009. NO_x, CO, VOC and PM must be repeated every five years. VOC must be measured at the oxidizer inlet as well as at the exhaust.
 - b) The permittee must conduct an initial performance test for NO_x, CO, VOC, PM and SO₂ within 180 days of startup in catalytic mode. VOC and CO must be measured at the oxidizer inlet as well as at the exhaust. Following the initial test, testing for NO_x, CO, VOC and PM must be repeated every 12 months until the oxidizer has been tested three times. Following the first three tests, Ecology may approve a reduction in testing frequency to not less than once every five years.
- 2) Testing must be conducted according to MRRR 19M.
- 3) The permittee must monitor and maintain records of the following:
 - a) For each ESP T-R set, daily records of:

- i) Primary and secondary voltage.
- ii) Spark rate.
- iii) T-R set status.
- b) RTCO natural gas usage, by month.
- c) Startup and shutdown records for the RTCO and ESP, maintained per MRRR 21M.
- d) Nature and details of RTCO and ESP malfunction, including date, time, duration, cause and corrective action taken, maintained per MRRR 21M.
- e) Maintenance and inspection records for all pollution control equipment.
- f) FBC operating rate.

[Order No. 23AQ-E053, Approval Condition 4], [PSD-X80-01 First Amendment, Approval Conditions 6a]

COMPLIANCE ASSURANCE MONITORING (CAM): HOG FUEL BOILER AND FBC

12M. Monitoring, Recordkeeping, and Reporting as required by 40 CFR 64 – CAM must be subject to the following general conditions:

- 1) **Applicability:** The CAM requirements in 40 CFR Part 64 apply to the Hog Fuel boiler and FBC with respect to the particulate emission limitations identified in Conditions 2.4.2, 2.4.3 and 2.5.5.
- 2) **Monitoring Operation:** Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee must conduct all monitoring at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities must not be used for CAM purposes, including data averages and calculations, or fulfilling a minimum data availability requirement. The permittee must use all the data collected during all other periods in assessing the operation of the control device and associated control system. [40 CFR 64.7(c)]
- 3) **Proper maintenance:** At all times, the permittee must maintain the monitoring, including maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b) 7/1/19]
- 4) **Minimum data availability:** The permittee must recover valid monitoring data for at least 90 percent of the time the emission unit is required to be monitored each month. [40 CFR 64.6(c)(4) 7/1/19]
- 5) **Response to excursions or exceedances:** An excursion occurs whenever an indicator is not within the range or limit in Table 12M.1. or 12M 2. The permittee must respond to excursions by restoring the pollutant-specific emission unit to normal operation (i.e. indicators returned to within range) as expeditiously as practicable in accordance with good air pollution control

practices for minimizing emissions. The response must include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions).

- a) Corrective actions may include initial inspection and evaluation, documenting those operations returned to normal without operator action, follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard.
 - b) All excursions must be included in the monthly deviation report required by standard condition 2.10.1. Any excursion in which the unit cannot be returned to within the indicator range within 24 hours of discovery must be considered an exceedance and identified as such in the monthly deviation report.
 - c) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. [40 CFR 64.7(d)(2) (7/1/19)]
 - d) Upon discovery that the monitoring as designed is insufficient to provide indications of all deviations, the permittee must notify Ecology of the monitoring deficiency. Notification must be included in the monthly deviation report.
- 6) CAM Recordkeeping:
- a) The permittee must maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan(s) required as well as any activities undertaken to implement a quality improvement plan, and any other required supporting information (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Records must be maintained for a period of five years.[40 CFR 64.9(b)(1)]
 - b) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review and does not conflict with other applicable recordkeeping requirements. [40 CFR 64.9(b)(2)]
- 7) CAM Reporting: The semi-annual monitoring report required by Standard Condition 2.10.2 must include the following:
- a) Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions of exceedances, as applicable, and the corrective actions taken.
 - b) Summary information on the number, duration, and cause (including unknown cause, if applicable) for monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks).
 - c) A description of any actions taken during the reporting period to implement any QIP's in effect.

- d) Any notice required by 40 CFR 64.7(e) of the failure of CAM monitoring to indicate an excursion or exceedance during a period in which the permittee identified a failure to meet an emission limitation. [40 CFR 64.9(a)(2)(i),(ii),(iii) and 64.7(e) (7/1/19)]
- 8) Annual Compliance Certification: The compliance certification required by Standard Condition 1.13.3 must identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance has occurred. [40 CFR 70.6(c)(5)(iii)(C)]

Table 12 M.1 Hog Fuel Boiler CAM

Pollutant-specific emission limit	Indicator	Monitoring Method	Monitoring Frequency	Quality Assurance Requirements
PM limit referenced in Condition 5.5.5	Two-day average multiclone Δp between 1" & 5" water column.	Direct read	Eight hours	Follow manufacturer's calibration, inspection, maintenance, and operating requirements
	Two-day average EFB Δp less than 6" water column	Direct read	Eight hours	
	Two-day average EFB bed voltage greater than 5.0 kV	Direct read	Eight hours	
	Two-day average EFB ionizer voltage greater than 20 kV	Direct read	Eight hours	

Table

12M.2 FBC CAM

Pollutant-specific emission limit	Indicator	Monitoring Method	Monitoring Frequency	Quality Assurance Requirements
PM limit referenced in Condition 2.4.2	ESP T/R set No.1 Secondary voltage <30 kV (hourly average).	electronic	Monitored continually, hourly average calculated every 60 minutes	Follow manufacturer's calibration, inspection, maintenance, and operating requirements
	ESP T/R set No.2 Secondary	electronic	Monitored continually,	

Pollutant-specific emission limit	Indicator	Monitoring Method	Monitoring Frequency	Quality Assurance Requirements
	voltage <25 kV (hourly average)		hourly average calculated every 60 minutes	
	ESP T/R set No.3 Secondary voltage <25 kV (hourly average)	electronic	Monitored continually, hourly average calculated every 60 minutes	

HOGGED FUEL BOILER, ELECTRIFIED FILTER BED

13M. The following monitoring, recordkeeping, and reporting must apply to the hogged fuel boiler and the electrified filter bed. Requirements that specify a unit or process apply only to that process. Requirements that are stated generally, apply generally.

The following monitoring must be performed, and equipment installed as specified:

- 1) A daily monitoring log must be maintained with the following parameters for the electrified filter bed/multiclone control system recorded at least once per day:
 - a) EFB Bed voltage (KVDC).
 - b) EFB Ionizer voltage (KVDC).
 - c) EFB Ionizer current (Amps).
 - d) EFB Inlet temperature (°F).
 - e) EFB Outlet temperature (°F),
 - f) EFB differential pressure (in. water column).
 - g) Multiclone differential pressure (in. water column).
 - h) Date and time.

- 2) A daily monitoring log must be maintained with the following parameters for the hogged fuel boiler recorded at least once per day:
 - a) Steam production (lbs/hour).
 - b) Stack temperature (°F).
 - c) Boiler O₂ (percent).
 - d) Pressure (in. water column) at the following locations: boiler under grate, boiler outlet, furnace pressure, F.D. fan outlet, and furnace draft.
 - e) Date and time.

- 3) Equipment must continue to be operated providing continuous measurement of the oxygen content (percent O₂) of the hogged fuel boiler exhaust gas. The continuous measurement equipment must conform to 40 CFR 60, Appendix B, Performance Specification 3. The Quality Assurance Plan as submitted to Ecology must be updated upon request by Ecology.

[PSD-X80-01 First Amendment, Approval Condition 6b], [Order No. 15AQ-E631, Approval Conditions 2.1, 2.5, 2.6 & 2.7]

14M. Periodic performance testing must be conducted on the emissions from the electrified filter bed (controlling the hogged fuel boiler) stack at least once every 60 calendar months. The testing cycle must be measured from the December 9, 2004, test. The following conditions must apply to all future testing:

- 1) Particulate matter must be reported for front-half (RM 5) and back-half (RM 202). Particulate matter emissions must be reported in grains per dry standard cubic foot of exhaust gas (gr/dscf) as well as pounds per hour (lb/hr).
- 2) The testing must consist of at least three runs, with the boiler operating at a minimum of 90 percent of maximum production rate. The maximum production rate must be the highest weekly average production rate over the past two years. The boiler must be operated by the normal boiler operator during stack testing.
- 3) The testing will consist of two runs at normal boiler operation and one run including grate ash cleaning and/or soot blowing. A weighted average of the three runs must be used to calculate emissions.
- 4) All monitored boiler and control device operating parameters must be recorded during the entire duration of the testing and included in the test report.

[[Order No. 15AQ-E631, Approval Condition 2.1.3 & 2.1.4, 2.2, 2.3, 2.4], [WAC 173-401-615(1)(b)], [WAC 173-401-630(1)]]

15M. Monitoring – A Continuous Opacity Monitoring System (COMS) which meets the approval requirements of the Environmental Protection Agency is installed, maintained, and operating while the Boiler is operating. The COMS must conform to all provisions of Title 40, CFR Part 60, Appendix B, *Performance Specification 1 – Specifications and Test Procedures for Opacity Continuous Emissions Monitoring Systems in Stationary Sources*. The COMS must be operated using quality assurance procedures conforming to *EPA 340/1-86-010, Recommended Quality Assurance Procedures of Opacity CEMS*. The permittee must prepare a Quality Assurance (QA) Plan outlining the quality assurance procedures used to verify the reliability of the COMS data. Such a document must specify the frequency at which each quality assurance procedure will be performed.

Recordkeeping – The permittee must maintain the following records related to the QA Plan and COMS. Such records must be retained for a period of at least five years and must be well organized and readily accessible for inspection by Ecology personnel:

- 1) A copy of the QA Plan.
- 2) Records of all quality assurance procedures performed for a period of five years.

3) Chart recorder readings or computer file data from the COMS.

Reporting – The QA Plan must be submitted to Ecology no later than 60 days following the effective date of this AOP and will be subject to Ecology approval.

[Order No. 15AQ-E631, Approval Condition 2.1.2], [WAC 173-401-630(1)]

16M. The permittee must create, follow, and maintain O&M manuals for the hogged fuel boiler, multiclone, and EFB. The O&M manuals must be maintained in an up-to-date manner, well organized, and easily accessible for inspection by Ecology personnel. The O&M manual must be reviewed at least annually and updated within 30 days of any modifications to the hogged fuel boiler, multiclone, EFB or operating procedures.

Emissions that result from failure to follow the requirements of the O&M manuals or manufacturer's instructions may be considered proof that the equipment was not properly operated, maintained, and tested. Manufacturer's information may be referenced rather than included in the manuals.

[Order No. 15AQ-E631, Approval Condition 2.4]

17M. The maximum hourly average production rate for the hogged fuel boiler must be determined as follows:

- 1) For the period May 1st through September 30th, the maximum rate must be 40,000 lbs steam/hour.
- 2) For the period October 1st through April 30th, the maximum rate must be 45,000 lbs steam/hour.
- 3) The maximum steam rate must be obtained by determining the average steam production rate from the most recent source test and dividing this number by 0.90, except that they must not exceed the production rate limits specified in 1) and 2) above.

[Order No. 15AQ-E631, Approval Conditions 2.2, 2.5]

18M. The following conditions must apply to use of the hogged fuel boiler abort gate:

- 1) The abort gate must be used only in emergency situations caused by one of the following:
 - a) Failure of the EFB FD fan.
 - b) Fire in the EFB system.
 - c) Power outage to the EFB.
 - d) Plugging of the EFB filter media.
- 2) Whenever the abort gate is used, fuel feed to the boiler must be stopped and the boiler taken off line.
- 3) Any time the abort gate is used, the permittee must notify Ecology by telephone or fax no later than the next business day, and in writing within five days.

- 4) Records documenting the nature and details of any situation in which the abort gate located downstream of the multiclone on the hogged fuel boiler is utilized and boiler exhaust gases bypass the EFB must be maintained.
- 5) Under no circumstances must the boiler be operated when exhaust gases bypass the EFB.

[Order No. 15AQ-E631, Approval Condition 2.6]

PCWP MACT

19M. PCWP MACT Testing*

The permittee must conduct each performance test according to the requirements in 40 CFR 63.7(d)(1)-(5), 63.7(e)(1)-(3), the requirements in 40 CFR 63.2262 (a) through (e), (g)(1), (h),(j), (k) and (l) and according to the methods specified in 40 CFR 63 Subpart DDDD Table 4 (1) through (5).

20M. PCWP MACT Monitoring

- 1) The permittee must install, operate, and maintain each continuous parameter monitoring system (CPMS) according to:
 - a) 40 CFR 63.2269 (a)(1) through (3) General continuous parameter monitoring requirements.
 - b) 40 CFR 63.8(c) Operation and maintenance of continuous monitoring systems. (1) through (4), (5) and (8).
 - c) 40 CFR 63.8(d) Quality Control Program. (1) through (3).
 - d) 40 CFR 63.8(e) Performance Evaluation of Continuous Monitoring Systems (1) through (5).
 - e) 40 CFR 63.8(g)(1) through (5) Reduction of Monitoring Data.
- 2) For each temperature monitoring device, the permittee must meet the requirements in 40 CFR 63.2269 (b) *Temperature monitoring, (1) through (6)*.
- 3) The permittee must monitor and collect data according to 40 CFR 63.2270 (b), (c), (d) and (f).

21M. PCWP MACT Recordkeeping

- 1) The permittee must keep the following records:
 - a) A copy of each notification and report that the permittee submitted to comply with 40 CFR 63 Subpart DDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).
 - b) Startup, shutdown, and malfunction plan records required by 40 CFR 63.6(e)(3)(iii) through (v).
 - c) Startup, shutdown, and malfunction records required by 40 CFR 63.10(b)(2)(i) through (v).
 - d) Documentation of the approved routine control device maintenance exemption for the RTO, including the information required for §63.2281(c)(5).

- e) CPMS records required by 40 CFR63.10 (b)(2)(vi) through (xi).
 - f) CPMS records required by 40 CFR 63.10(c)(1), (5) through (8) and (10) through (15).
 - g) If operating a catalytic oxidizer, records of annual catalyst activity checks and subsequent corrective action.
 - h) Performance test records as required by 40 CFR 63.7(g)(3).
- 2) The permittee must maintain records in a form suitable and readily available for expeditious review as specified in 40 CFR 63.10(b)(1).
 - 3) Keep each record for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR 63.10 (b)(1).

[40 CFR 63.2282, 2283]

22M. PCWP MACT Notification*

The permittee submits the following notifications by the dates specified:

- 1) 40 CFR 63.8(f)(4) Request to use alternative monitoring procedure, if applicable.
- 2) 40 CFR 63.8 (f)(6) Alternative to RATA, if applicable.
- 3) 40 CFR 63.9(b) Initial applicability notification for existing sources.
- 4) 40 CFR 63.9(c) Request for compliance extension, if applicable.
- 5) 40 CFR 63.9(d) Special compliance requirements, if applicable.
- 6) 40 CFR 63.9(e) Notification of performance test.
- 7) 40 CFR 63.9(g)(1) Notification of date of CMS performance evaluation
- 8) 40 CFR 63.9(h)(2)(ii) Notification of Compliance Status for each performance test, design evaluation or other initial compliance demonstration as specified in Tables 4, 5 and 6.
 - a) For each initial compliance demonstration that does not require a source test, submit notification within 30 calendar days.
 - b) For each initial compliance demonstration that requires a source test, submit notification within 60 calendar days of test completion.
- 9) 40 CFR 63.9(j) Notification of change in information already provided within 15 calendar days of the change.
- 10) Request for routine control device maintenance exemption per 63.2251 no later than 30 days before the compliance date.
- 11) Notify EPA Administrator at least 30 days before:

- a) Modifying or replacing the control system for any process unit subject to the compliance options and operating requirements.
- b) Changing a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter.

[40 CFR 63.2280 (a),(b),(c),(d),(e), (g)(1)&(3)]

23M. PCWP MACT Reports

The permittee must submit the following reports from 40 CFR 63, Subpart DDDD, Table 9:

- 1) A semi-annual compliance report containing the following:
 - a) The information in 40 CFR 63.2281(c)(1) through (8).
 - b) For each deviation from a compliance option or operating requirement and for each deviation from the work practice requirements in 40 CFR 63, Subpart DDDD, Table 8 here a CMS is not used to comply with the compliance options, operating requirements or work practice requirements, the information in 40 CFR 63.2281 (c)(1) through (6) and 40 CFR 63.2281 (d)(1) and (2). This includes periods of startup, shutdown, and malfunction and routine control device maintenance.
 - c) For each deviation from a compliance option or operating requirement where a CMS is used to comply with the compliance options or operating requirements the report must include the information in 40 CFR 63.2281 (c)(1) through (6) and 40 CFR 63.2281 (e)(1) through (11). This includes periods of startup, shutdown and malfunction and routine control device maintenance.

The report must cover the semi-annual periods from January 1 through June 30 and July 1 through December 31. Reports must be postmarked or delivered no later than July 31 for the reporting period ending on June 30 or January 31 for the reporting period ending December 31.

The report must include all deviations as defined in subpart DDDD. Submittal of a complete report will satisfy any obligation to report the same deviations in the semi-annual monitoring report required by standard condition 2.10.2 of the AOP.
- 2) An immediate startup, shutdown, and malfunction report for a startup, shutdown, or malfunction during the reporting period when action taken is not consistent with the startup, shutdown, and malfunction plan in MRRR 26M. The report must contain the following, as required by 40 CFR 63.10(d)(5)(ii):
 - a) An immediate report of actions taken, submitted by telephone or fax within two working days of commencing actions inconsistent with the SSM plan.
 - b) A follow-up report by letter, postmarked within seven working days after the end of the event that contains the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy. Report explains the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction plan, describing all excess emissions and/or parameter monitoring exceedances which are

believed to have occurred (or could have occurred in the case of malfunctions), and actions taken to minimize emissions in conformance with §63.6(e)(1)(i).

[40 CFR 63.2281]

24M. Group 1 Miscellaneous Coating Operations

- 1) Submit a signed statement that non-HAP coating are being used. The statement must be included in the Notification of Compliance Status in MRRR 22M 11).
- 2) Continue to use non- HAP coatings and keep records showing that only non-HAP coatings are used.
- 3) Any use of coatings not meeting the definition of non-HAP coating in 40 CFR 63.2292 must be reported as a deviation in the Compliance Report required by MRRR 23M.

[40 CFR 63.2241(a), 63.2260(b),(c), 63.2271(b), 63.2281, 40 CFR 63, Subpart DDDD, Tables 6(5), 8(5) and 9(1) & (2)]

25M. Fugitive emissions from dryer doors

- 1) Develop a plan for review and approval for minimizing fugitive emissions from the veneer dryer heated zones and submit the plan with the Notification of Compliance Status required by MRRR 22M 11).
- 2) Continue to use non- HAP coatings and keep records showing that only non-HAP coatings are used.
- 3) Any use of coatings not meeting the definition of non-HAP coating in 40 CFR 63.2292 must be reported as a deviation in the Compliance Report required by MRRR 23M.

[40 CFR 63.2241(a), 63.2260(b),(c), 63.2271(b), 63.2281, 40 CFR 63, Subpart DDDD, Tables 6(5), 8(5) and 9(1) & (2)]

26M. Startup, Shutdown and Malfunction Plan

- 1) The permittee must develop a written startup, shutdown and malfunction plan including the information in §63.6(e)(3)(i) by the compliance date in Subpart DDDD. A current SSM plan must be maintained at the affected source, and available upon request by Ecology or the EPA. Elements of the SSM plan are not applicable requirements as defined in 40 CFR 70.2 and are not subject to the permit shield.
- 2) The SSM plan may be periodically revised according to §63.6(e)(3)(vii) or (viii). Revisions to the SSM plan do not constitute permit revisions. Copies of any superseded versions of the SSM plan must be maintained at the source for at least five years.
- 3) SSM records must be kept according to MRRR 21M 1)b).
- 4) SSM events must be reported according to MRRR 23M.

[40 CFR 63.6(e)(3) (i) through (ix)], [40 CFR 63.10(d)(5)(i), (ii)]

Cleaver Brooks CBEX Elite Natural Gas (NG) Boilers

27M. The permittee must create, follow, and maintain O&M manuals for the NG Boilers. The O&M manuals must be maintained in an up-to-date manner, well organized, and easily accessible for inspection by Ecology personnel. The O&M manual must be reviewed at least annually and updated within 30 days of any modifications to the NG Boilers or operating procedures.

Emissions that result from failure to follow the requirements of the O&M manuals or manufacturer's instructions may be considered proof that the equipment was not properly operated, maintained, and tested. Manufacturer's information may be referenced rather than included in the manuals.

[Order No. 15AQ-E631, Approval Condition 3.5]

28M. Continuous compliance must be demonstrated by conducting a tune up every five years as specified in 40CFR Part 63 Subpart DDDDD, 63.7540(a)(10)(i) through (vi). The burner inspection specified in paragraph (a)(10)(i) may be delayed until the next scheduled or unscheduled unit shutdown. Each burner must be inspected at least once every 72-months. Tune-up must include the following:

- 1) Inspect burner.
- 2) Inspect flame pattern.
- 3) Inspect system controlling the air-to-fuel ratio.
- 4) Optimize total emissions of CO and NOx.
- 5) Measure concentrations of effluent CO in ppm, by volume, and O2 percent before and after adjustments are made. Measurements may be taken with portable CO analyzer.

[Order No. 15AQ-E631, Approval Condition 3.6]

29M. Records must be kept on-site and made available to Ecology upon request, for the most recent 60-month period:

- 1) Annual fuel usage for the boilers in cubic feet, therms or gallons based on monthly fuel combustion records.
- 2) Records of the boiler tune-ups and burner inspections.
- 3) Boiler compliance report must cover five-year periods from January 1 to December 31. The compliance report must contain the following as specified in §63.7550(c)(5)(i) through (iv) and (xiv):

[Order No. 15AQ-E631, Approval Conditions 3.1 through 3.4, 3.6, 3.8, 3.9]

4.0 Inapplicable Requirements

Ecology has determined that the entire source, including all emission units, is not subject to the following requirements at the time of permit issuance. Some of the requirements listed

below may become applicable during the permit term due to an invoking event, even though the requirement is deemed inapplicable at the time of permit issuance. Such requirements must therefore be met on a timely basis by the permittee through submittal of a compliance schedule, per WAC 173-401-510(2)(h)(iii)(B).

Emission Unit or Activity	Requirement	Description	Basis of non-applicability
Hogged Fuel Boiler	40 CFR 60, Subpart Dc	Standards of Performance for steam generating units for which construction, modification, or reconstruction commenced after June 9, 1989	The boiler was constructed prior to June 9, 1989, and has not been reconstructed
Hogged Fuel Boiler	40 CFR 63, Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters	The boiler is an affected source as defined in 40 CFR 63.7490. At the time of issuance, the requirements of Subpart DDDDD will be applicable once the permittee installs adequate emission control technologies to achieve final compliance with Subpart DDDDD emission limits as specified in Approval Order 15AQ-E631, Issued 11/30/2015. The HFB must not be operated until such emission control technologies are installed.
Hogged Fuel Boiler	40 CFR 64	Compliance Assurance Monitoring (CAM) for NO _x , CO, SO ₂ , VOC and Mercury emissions.	The boiler does not use control devices to comply with limits on NO _x , CO, SO ₂ , VOC and mercury emissions.
Hogged Fuel Boiler	40 CFR 60, Subpart CCCC	Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for which construction is commenced after November 30, 1999, or for which modification or reconstruction is commenced on or after June 1, 2001	The boiler does not meet the definition of Commercial and Industrial Solid Waste Incineration Unit in 40 CFR 68.2875.
FBC	40 CFR 64	Compliance Assurance Monitoring (CAM) for NO _x , CO, SO ₂ and Mercury emissions.	The FBC does not use control devices to comply with limits on NO _x , CO, SO ₂ and mercury emissions

Emission Unit or Activity	Requirement	Description	Basis of non-applicability
FBC	40 CFR 64	Compliance Assurance Monitoring (CAM) for VOC	Emission limitations or standards proposed after November 15, 1990, pursuant to section 111 or 112 of the Clean Air Act are exempt.
FBC	40 CFR 60, Subpart CCCC	Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for which construction is commenced after November 30, 1999, or for which modification or reconstruction is commenced on or after June 1, 2001	The FBC does not meet the definition of Commercial and Industrial Solid Waste Incineration Unit in 40 CFR 68.2875
Veneer dryers	63.6(h)(1)-(9)	Requirements for opacity and visible emission standards.	Does not apply to Subpart DDDD.

See Application Form 7 for complete list of Inapplicable Requirements.

Appendix A: Federal and State Regulation Date Reference List

WAC	F	S	CFR	F	RCW	S
425	X	3/13/2000	52.33	7/1/2023	70A.15.1070	2023
441	X	3/12/2022	60.11	7/1/2023	70A.15.2210	2023
460	X	11/22/2019	60.12	7/1/2023	70A.15.2220	2023
400-035	X	9/16/2018	60.332	7/1/2023	70A.15.2230	2023
400-040	2/24/2020	9/16/2018	60.334	7/1/2023	70A.15.2270	2023
400-050	2/24/2020	1/19/2023	60.335	7/1/2023	70A.15.2500	2023
400-060	2/24/2020	11/25/2018	60.4	7/1/2023	70A.15.2530	2023
400-070	12/28/2023	1/19/2023	60.43	7/1/2023	70A.15.6410	2023
400-075	X	7/1/2016	60.46	7/1/2023	70A.15.6420	2023
400-105	2/24/2020	11/25/2018	60.48	7/1/2023		
400-110	9/29/2016	12/29/2012	60.49	7/1/2023		
400-113	4/29/2015	12/29/2012	60.7	7/1/2023		
400-114	X	12/29/2012	60.8	7/1/2023		
400-171	12/28/2023	9/16/2018	61, subpart M	7/1/2023		
400-200	10/3/2014	2/10/2005	63.6	7/1/2023		
400-205	6/2/1995	3/22/1991	63.7	7/1/2023		
400-560	4/29/2015	12/29/2012	63.8	7/1/2023		
400-720	10/6/2016	1/19/2023	63.9	7/1/2023		
400-820	11/7/2014	12/29/2012	63.10	7/1/2023		
401-200	1/2/2003	3/5/2016	63.455	7/1/2023		
401-500	1/2/2003	10/17/2002	63.7500	7/1/2023		
401-510	1/2/2003	3/5/2016	63.7510	7/1/2023		
401-520	1/2/2003	11/4/1993	63.7515	7/1/2023		
401-530	1/2/2003	10/17/2002	63.7520	7/1/2023		
401-605	1/2/2003	11/4/1993	63.7525	7/1/2023		
401-610	1/2/2003	11/4/1993	63.7540	7/1/2023		
401-615	1/2/2003	10/17/2002	63.7545	7/1/2023		
401-620	1/2/2003	11/4/1993	63.7550	7/1/2023		
401-625	1/2/2003	11/4/1993	64.3	7/1/2023		
401-630	1/2/2003	3/5/2016	64.4	7/1/2023		
401-640	1/2/2003	11/4/1993	64.6	7/1/2023		
401-645	1/2/2003	11/4/1993	64.7	7/1/2023		
401-650	1/2/2003	11/4/1993	64.8	7/1/2023		
401-705	1/2/2003	11/4/1993	64.9	7/1/2023		
401-710	1/2/2003	10/17/2002	68.36	7/1/2023		
401-720	1/2/2003	11/4/1993	70.6	7/1/2023		
401-722	1/2/2003	10/17/2002	82	7/1/2023		
401-724	1/2/2003	3/5/2016				
401-730	1/2/2003	11/4/1993				
401-930	1/2/2003	1/30/1994				
455-100	X	11/25/2018				
455-120	X	12/31/2012				