

STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

4601 N Monroe Street • Spokane, Washington 99205-1295 • (509)329-3400

May 04, 2016

Mr. Robert Glover Production manager 1274 S. Boise Road Kettle Falls, WA 99141

Re: Final Renewal Air Operating Permit & Statement of Basis - Arden Sawmill

Dear Mr. Glover:

Enclosed is FINAL AOP No. 16AQ-E002 and the Statement of Basis for the Arden Sawmill. If you have any questions concerning the content of the documents, please contact me at randall.ruddick@ecy.wa.gov or (509) 329-3528.

The enclosed PERMIT may be appealed. The appeal procedures are described in the permit under Standard Condition 1.23.

Sincerely,

Randall Ruddick

Air Operating Permit Development Specialist

Air Quality Program

Eastern Regional Office

Department of Ecology

cc:

Part 70 Air Operating Permits

U.S. EPA Region 10, AWT-150 1200 Sixth Avenue, Suite 900

Seattle, WA 98101

RR: kla

WASHINGTON STATE DEPARTMENT OF ECOLOGY EASTERN REGIONAL OFFICE 4601 NORTH MONROE SPOKANE, WASHINGTON 99205-1295

IN THE MATTER OF THE COMPLIANCE BY)	AIR OPERATING P	ERMIT	
BOISE CASCADE WOOD PRODUCTS, LLC)	No. 16AQ-E002		
ARDEN LUMBER)	_		•
with Section 70.94.161 RCW, Operating Permits for)	FINAL PERMIT		
Air Contaminant Sources, and the applicable rules and)			
Regulations of the Department of Ecology)			
To: Boise Cascade Wood Products, LLC		Issuance Date:	May 04, 2016	
1274 S Boise Rd		Effective Date:	May 05, 2016	
Kettle Falls, WA 99141		Expiration Date:	May 04, 2021	

Responsible Official: Mr. Robert Glover

Source Location: 634 Highway 395 South, Colville, WA 99114

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 70.94 Revised Code of Washington (RCW) and the Operating Permit Regulation, Chapter 173-401 Washington Administrative Code (WAC).

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

REVIEWED

Robert K

Departmen

State of Was

The Renewal Air Operating Permit, DATED at Spokane, Washington, this day 4th of May, 2016.

PREPARED BY:

Randall Ruddick

Eastern Region Air Quality Section

Department of Ecology

State of Washington

APPROVED BY:

Karen Wood, Section Manager Regional Air Quality Section

Department of Ecology

State of Washington

TABLE OF CONTENTS

LIST OF AB	BREVIATIONS	3
1. Standard	l Conditions	4
1.1	Permit Shield	
1.2	Enforceability	4
1.3	Permit Fees	4
1.4	Permit Continuation	
1.5	Property Rights	
1.6	Inspection and Entry	
1.7	Duty to Comply	5
1.8	Duty to Provide Information	
1.9	Duty to Supplement or Correct Application	
1.10		
1.11	Excess Emissions Due to an Emergency	6
1.12		
1.13	Reporting	7
1.14		
1.15	Administrative Permit Amendments	9
1.16		
1.17	Reopening for Cause	
1.18	\mathcal{C}	
1.19		
1.20		
1.21	Replacement or Substantial Alteration of Emission Control Technology	12
1.22		
1.23	11	
1.24	Federal Chlorofluorocarbons (CFC) Requirements – Title VI of the FCAA	13
1.25	Reasonably Available Control Technology (RACT)	
1.26		
1.27		
1.28	C	
1.29		
1.30	,	
1.31	Nonroad Engines	16
2. Applicab	le Requirements	16
2.1	Section #1, Facility Wide	
2.2	Section #2, Hogged Fuel Boiler	19
2.3	Section #3, Natural Gas Fired Boiler	
2.4	Section #4, Lumber Drying Kilns	24
2.5	Section #5, Wood Residuals Collection & Transport System	
2.6	Section #6, Planer Baghouse and Truck Bin Baghouse	
2.7	Section #7, Cummins Diesel Fire Pump Engine	
3. Monitori	ng, Recordkeeping, and Reporting Requirements (MRRR)'s	
4. Inapplica	able Requirements	41

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

ft³ 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

N₂ Nitrogen gas

NOC Notice of Construction NO_x Oxides of Nitrogen

NSPS New Source Performance Standard

O₂ Oxygen

O&M Operation & Maintenance
P.E. Professional Engineer
PM Particulate Matter

PM₁₀ Particulate Matter with aerodynamic diameter ≤ 10 micrometers

ppm Parts per million

QIP Quality Improvement Plan

PSD Prevention of Significant Deterioration
RACT Reasonably Available Control Technology

RCW Revised Code of Washington

RM EPA Reference Method from 40 CFR Part 60, Appendix A

scfm Standard Cubic Feet per Minute SIP State Implementation Plan

SO₂ Sulfur Dioxide
TAP Toxic Air Pollutant
TPD Tons Per Day
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, unless otherwise specified, at the following addresses:

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

Part 70 Air Operating Permits U.S. EPA Region 10, AWT-150 1200 Sixth Avenue, Suite 900 Seattle, Washington 98101-3140

1. STANDARD CONDITIONS

1.1 Permit Shield

- **1.1.1** Compliance with the terms and conditions of this permit shall 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 shall not apply to any insignificant emissions unit or activity designated under WAC 173-401-530.

[WAC 173-401-530(3), 12/31/12], [WAC 173-401-640(1), 12/31/12]

1.2 Enforceability. All terms and conditions of the permit are enforceable by the US EPA and citizens, unless specifically designated as state-only enforceable (S).

[WAC 173-401-625, 12/31/12], [Order 15AQ-E608, issued 07/21/15]

1.3 Permit Fees. The permittee shall pay fees as a condition of this permit in accordance with Ecology's fee schedule. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in chapter 70.94 RCW. Ecology may revoke this permit if the permit fees are not paid, per WAC 173-401-930(3).

[WAC 173-401-620(2)(f), -930(3), 12/31/12], [RCW 70.94.162(1), 01/04/01 (S)]

1.4 Permit Continuation. This permit and all terms and conditions contained therein, including any permit shield provided under WAC 173-401-640, shall 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) shall 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), 12/31/12]

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), 12/31/12]

- **1.6 Inspection and Entry.** Upon presentation of credentials and other documents as may be required by law, the permittee shall 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 FCCA, 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 EPA 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, 07/12/90. The permittee shall be required to provide platform and sampling ports. Ecology shall be allowed to obtain a sample from any emissions unit. The permittee shall be given the opportunity to observe the sampling and to obtain a sample at the same time. Ecology may require access to records, books, files and other information specific to the control, recovery, or release of regulated pollutants.
- **1.6.5** No person shall 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 shall limit the ability of EPA to inspect or enter the premises of the permittee under Section 114 or other provisions of the FCAA.

[WAC 173-401-630(2), 12/31/12], [WAC 173-400-075(2), -105(2) and (4), 9/20/93, 12/29/12 (S)], [RCW 70.94.200, 1/4/01 (S)], [Approval Order No. 15AQ-E608, Issued 07/21/2015, Approval Conditions 3.4, 5.7, 8.5]

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 70.94 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), 12/31/12], [Approval Order No. 15AQ-E608, Issued 07/21/2015, Approval Condition 8.8]

1.8 Duty to Provide Information. The permittee shall 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 shall 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 shall maintain confidentiality of such information in accordance with RCW 70.94.205.

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

[WAC 173-401-620(2)(e), 12/31/12], [WAC 173-400-105(7), (8), 9/20/93, 12/29/12 (S)]

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, shall promptly submit such supplementary facts or corrected information. The permittee shall 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), 12/31/12]

1.10 Need to Halt or Reduce Activity not a Defense. It shall 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), 12/31/12]

- **1.11 Excess Emissions Due to an Emergency.** The permittee may seek to establish that noncompliance with a technology-based emission limitation under this permit was due to an emergency. To do so, the permittee shall 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 2 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 should be directed to Ecology at the address included in this permit or may be submitted via e-mail or fax to the appropriate Ecology personnel.

[WAC 173-401-645, 12/31/12]

- **1.12 Unavoidable Excess Emissions.** Excess emissions determined to be unavoidable under the procedures and criteria in WAC 173-400-107 shall be excused and not subject to penalty.
 - **1.12.1** The permittee shall have the burden of proving to Ecology that excess emissions were unavoidable. This demonstration shall be a condition to obtaining relief under 1.12.2, 1.12.3, or 1.12.4.
 - **1.12.2** Excess emissions due to startup or shutdown conditions shall be considered unavoidable provided the source reports as required under Condition 1.13.1 and adequately demonstrates that the excess emissions could not have been prevented through careful planning and design and if a bypass of control equipment occurs, that such bypass is necessary to prevent loss of life, personal injury, or severe property damage.
 - **1.12.3** Excess emissions due to scheduled maintenance shall be considered unavoidable if the source reports as required under Condition 1.13.1 and adequately demonstrates that the excess emissions could not have been avoided through reasonable design, better scheduling for maintenance or through better operation and maintenance practices.
 - **1.12.4** Excess emissions due to upsets shall be considered unavoidable provided the source reports as required under Condition 1.13.1 and adequately demonstrates that:

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.

An "emergency" means any situation arising from sudden and reasonably enforceable 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 shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- **1.12.4.1** The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition.
- **1.12.4.2** The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance.
- 1.12.4.3 The operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded.

[WAC 173-400-107, 9/20/93, 12/29/12 (S)]

1.13 Reporting

1.13.1 Deviation Reports. The permittee shall report deviations from permit requirements, including deviations that result in excess emissions, with the following information: the date and time the deviation occurred, the permit condition deviated from, 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. Such deviations shall be reported "promptly" to Ecology at the address included in this permit or may be submitted via e-mail or fax to the appropriate Ecology personnel.

For deviations which represent a potential threat to human health or safety, or which the source believes to be unavoidable, "promptly" means as soon as possible, but in no case later than 12 hours after the deviation is discovered.

Other deviations shall be reported no later than 30 days after the end of the month during which the deviation is discovered. Upon request by Ecology, the permittee shall submit a full written report including further details regarding the known causes, the corrective actions taken, and the preventative measures to be taken to minimize or eliminate the chance of recurrence.

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

The source shall maintain a contemporaneous record of all deviations. Responsible official certification in accordance with Condition 1.13.5 of monthly deviation reports shall be included in each semi-annual monitoring report covering all deviation reports made during the previous six month period.

[WAC 173-401-615(3)(b), 12/31/12], [WAC 173-400-107, 9/20/93, 12/29/12 (S)]

1.13.2 Semi-Annual Monitoring Reports. The permittee shall submit semi-annual reports to Ecology which include monitoring, recordkeeping, and/or reporting information required to be reported under Section 3 of this permit unless stated otherwise in a specific MRRR. Six month periods shall be measured from January 1st through June 30th and July 1st through December 31st. Semi-annual monitoring reports shall be due no later than 45 days following the end of each 6 month period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with Condition 1.13.6.

[WAC 173-401-615(3)(a), 12/31/12]

1.13.3 Compliance Certifications. The permittee shall submit a certification of compliance with permit terms and conditions at least once per year. The first compliance certification submitted under

this renewed permit will be for the period beginning on the May 05, 2016 and ending December 31, 2016. Subsequent certification periods shall be every calendar year. All certifications shall be submitted no later than 45 days following the end of the certification period. 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. All required reports must be certified by a responsible official consistent with WAC 173-401-520.

[WAC 173-401-630(5)(a), WAC 173-401-630(1), 12/31/12]

- **1.13.3.1** The certification shall 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.
 - **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).
 - **1.13.3.1.5** Such other facts as the authority may require to determine the compliance status of the source.

[WAC 173-401-630(5)(c), 12/31/12]

1.13.3.2 All compliance certifications shall be submitted to Ecology and EPA Region 10 at the respective addresses included in this permit.

[WAC 173-401-630(5)(d), 12/31/12]

- **1.13.3.3** The permittee need not certify compliance for insignificant emission units or activities. [WAC 173-401-530(2)(d), 12/31/12]
- **1.13.3.4** All compliance certifications shall include certification by a responsible official in accordance with WAC 173-401-520.
- 1.13.3.5 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 shall 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), 07/01/01], [40 CFR 60.11(g), 07/01/13]

1.13.4 Emission Inventory. The permittee shall submit an inventory of actual emissions from the source for each calendar year. The inventory shall include segmented stack and fugitive emissions of particulate matter, PM-10, PM-2.5, sulfur dioxide, oxides of nitrogen, carbon monoxide, total reduced sulfur compounds (TRS), fluorides, lead, volatile organic compounds (VOCs), ammonia, and other contaminants. In addition, data elements listed in Table 2a to Appendix A of Subpart A of 40 CFR 51 must also be reported. The emission inventory for each calendar year shall be submitted no later than April 15th of the following year. The permittee shall maintain records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards. Emission estimates used in the inventory may be based on the most recent published EPA emission factors for a source category, or other information available to the permittee, whichever is the better estimate. Emissions inventories shall be reported to Ecology in the Washington Emission Inventory Repository System, and a certification statement with

supporting data shall be provided to Ecology at the address included in this permit unless or until Ecology specifies another system or format.

[WAC 173-400-105(1), 9/20/93, 12/29/12(S)], [40 CFR Part 51, Subpart A, Appendix A, 7/1/13]

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, shall be submitted to: Greenhouse Gas Report, Air Quality Program, Department of Ecology, PO Box 47600, Olympia, WA 98504-7600. Annual GHG reports shall be submitted through Ecology's GHG Reporting page at http://www.ecy.wa.gov/programs/air/permit_register/ghg/ghg.html.

Reports must meet the requirements of WAC 173-411-050 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 October 31st of each year for the previous calendar year, unless the facility is also required to submit a GHG report to EPA, then the GHG report is due to Ecology March 31st of each year for GHG emissions from 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 shall 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.

[Chapter 173-441 WAC, 01/01/11]

1.13.6 Submittals. Reports, test data, monitoring data, notifications, certifications, and applications (including requests for renewal) shall be submitted to Ecology at the address included in this permit. Any document submitted to Ecology pursuant to this permit shall contain certification of truth, accuracy, and completeness by a responsible official. All certifications shall 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 shall 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), 12/31/12]

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 shall remain in effect and be enforceable.

[WAC 173-401-620(2)(h), 12/31/12], [RCW 70.94.905, 1/4/01 (S)]

1.15 Administrative Permit Amendments

- **1.15.1** An administrative permit amendment is a permit revision that:
 - **1.15.1.1** Allows for a change in ownership or operational control of this source where the permitting authority has determined that no other change in this permit is necessary and 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;
 - **1.15.1.2** Corrects typographical errors within the permit;

- **1.15.1.3** 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;
- **1.15.1.4** Requires more frequent monitoring or reporting by the permittee;
- 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, provide 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 shall, 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, 12/31/12]

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), 12/31/12]

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 (3) or more years prior to the expiration date of this permit. Such a reopening shall be completed no later than eighteen (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 shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
- **1.17.3** Reopening shall 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 time period 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, 12/31/12]

- **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 shall not weaken the enforceability of any existing permit conditions.
 - **1.18.2** Each such change shall meet all applicable requirements and shall 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 shall 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 shall not qualify for the permit shield under Condition 1.1.
 - **1.18.5** The permittee shall record 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 shall reside at the permitted facility.
 - **1.18.6** A source making a change under this section shall comply with the preconstruction review requirements established pursuant to Condition 1.20.

[WAC 173-401-724, 12/31/12]

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(31), without a permit revision, providing the conditions included below are met. The permit shield as described in Condition 1.1 shall 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 shall be provided as soon as possible after the event;
 - **1.19.1.4.1** The written notification shall include a brief description of the change within the permitted facility, the date on which the chance 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 shall be subject to the following:

- 1.19.2.1 The written notification required under Condition 1.19.1.4 shall 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 shall 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 shall 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 shall extend to terms and conditions that allow such increases and decreases.)
- 1.19.2.2 The permit shield described in Condition 1.1 shall not extend to any change made under this paragraph. Compliance with the permit requirements that the source will meet using the emissions trade shall 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 shall 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 shall include in its application proposed replicable procedures and permit terms that ensure the emissions trades are quantifiable and enforceable. The emissions trading provision shall not be applied to any emissions units for which emission are not quantifiable or for which there are no replicable procedures to enforce the emissions trades. The permit shall also require compliance with all applicable requirements.
- **1.19.2.4** A source making a change under this section shall comply with applicable preconstruction review requirements established pursuant to Condition 1.20.
- **1.19.2.5** No permit revision shall 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), 12/31/12]

1.20 New Source Review. The permittee shall not construct new sources or make modifications required to be reviewed under WAC 173-400-110, WAC 173-400-113, WAC 173-400-720, or Chapter 173-460 WAC 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 and -113, 8/20/93, 12/29/12 (S)], [WAC 173-400-113, 8/20/93, 12/29/12 (S)], [WAC 173-455-120, 12/31/12 (S)], [WAC 173-400-171, 8/20/93, 12/29/12 (S)], [WAC 173-400-720, 12/29/12], [WAC 173-460, 6/20/09 (S)], [RCW 70.94.152, 1/4/01 (S)]

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 shall file for and obtain approval from Ecology and pay the appropriate fees required by WAC 173-455-100(4) prior to commencing construction.

[WAC 173-455-100(4), 12/31/12 (S)], [WAC 173-400-114, 9/20/93, 12/29/12 (S)], [RCW 70.94.153, 1/4/01 (S)]

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, 12/31/12]

1.23 Permit Appeals

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

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

- File your appeal and a copy of this permit with the PCHB (see addresses below). Filing means actually receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this permit on Ecology in paper form by mail or in person (see addresses below). E-mail is not accepted.

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

Address and Location Information:

Street Addresses

Department of Ecology

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

Pollution Control Hearings Board

1111 Israel Rd SW STE 301 Tumwater, WA 98501 Mailing Addresses

Department of Ecology

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

Pollution Control Hearings Board

PO Box 40903 Olympia, WA 98504-0903

[RCW 70.94.221, 2013 (S)]

This provision for appeal in this section is separate from and additional to any federal rights to petition and review under Section 505(b) of the FCAA. [WAC 173-401-620(2)(i), 12/31/12]

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

- **1.24.1** The permittee shall 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 should 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 monitor (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 shall 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, 07/01/13], [RCW 70.94.970, 1/4/01 (S)], [RCW 70.94.980, 1/4/01 (S)]
- **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 shall be considered RACT for the purpose of permit issuance or renewal. RACT determinations under section 8, chapter 252, Laws of 1993 shall be incorporated into an operating permit as provided in WAC 173-401-730.

[WAC 173-401-605(3), 12/31/12], [RCW 70.94.154, 1/4/01 (S)]

1.26 Compliance Schedules

1.26.1 The permittee shall continue to comply with applicable requirements with which it is currently in compliance. The permittee shall 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), 12/31/12]

1.27 Record Keeping

- **1.27.1** The permittee shall 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 analysis.
 - **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), 12/31/12]

1.27.2 The permittee shall 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), 12/31/12]

1.27.3 The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) 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), 12/31/12]

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

[WAC 173-401-630(2)(b), 12/31/12], [40 CFR 60.7(b), 60.7(f), 07/01/01]

- **1.28** General Obligation Nothing in this permit shall 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), 12/31/12]

1.29 Permit Renewal and Expiration. This permit is issued for a fixed term of 5 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 May 03, 2020. 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 shall 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 shall be sent to Ecology at the address included in this permit.

[WAC 173-401-610; 173-401-710, 12/31/12]

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 shall comply with the requirements of that rule. Such activities include demolition, renovation, asbestos stripping or removal, installing or reinstalling insulation, manufacturing of fabricating certain items, spraying of certain materials, constructing roadways of certain materials, or disposal.

[40 CFR 61, Subpart M, 07/01/13], [WAC 173-400-075(1), 12/29/12 (S)]

1.31 Nonroad Engines. Prior to installation or operation of a non-road engine, as defined in WAC 173-400-030(56), the permittee shall meet the requirements of WAC 173-400-035. If the nonroad engine(s) has a cumulative maximum rated brake horsepower greater than 500, a notification of intent to operate will be submitted to Ecology. If the nonroad engine(s) has a cumulative maximum rated break horsepower greater than 2,000, the permittee will not operate the engine(s) unless Ecology issues written approval to operate.

[WAC 173-400-035, 12/29/12 (S)]

2. APPLICABLE REQUIREMENTS

Until this permit expires, is modified, or revoked, this permittee is authorized to operate air emission units in processes in Section 2.1 through 2.7. These emission units are subject to the requirements shown in Sections 2.1 through 2.7, 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 should 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) 12/31/12], [WAC 173-400-105(4) 12/29/12]

2.1 Facility Wide

The following requirements apply source wide, including, but not limited to the emission units in Section 2.2 through Section 2.7. Since monitoring, recordkeeping and reporting has not specifically been required by Ecology for insignificant emission units, per WAC 173-400-105(1), there are no air operating permit monitoring, recordkeeping and reporting requirements for the insignificant emission units under this facility-wide section, as allowed per WAC 173-401-530(2)(c). Condition numbers that are denoted with an asterisk indicate that streamlining of a less stringent requirement has taken place and is described in Section 12.0 of the Statement of Basis.

TABLE 2.1

Condition Number	Applicable Requirement	Enforceability (Federal & State = F) (State Only = S)	Description	Reference Test Method, If Applicable	MRRR Referenc e
2.1.1	WAC 173-400-040(1), (2), (2)(a), (2)(b) 11/03/14	F	Visible emissions shall not exceed 20% opacity for more than 3 minutes in any one hour	RM 9A	3M
2.1.2	WAC 173-400-060 11/03/14	F	General process units are required to meet all applicable provisions of WAC 173-400-040 and emissions of particulate material from any operation shall not exceed 0.1 grain/dscf of exhaust gas	RM 5	3M
2.1.3	WAC 173-400-040(3) 04/01/11	S	Particulate matter shall not be deposited beyond the property in sufficient quantity to interfere unreasonably with the use and enjoyment of other's property		2M, 4M
2.1.4	WAC 173-400-040(4)(a), (9)(a) 11/03/14	F	The source shall perform maintenance to minimize emissions and take reasonable precautions to prevent fugitive dust from becoming airborne		2M, 5M, 4M
2.1.65	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 5.4 WAC 173-400- 040(4)(a), (9)(a) 11/03/14	F	Fugitive dust control measures shall be taken to prevent fugitive emissions in accordance with the Fugitive Dust Control Plan		2M, 5M, 4M
2.1.6	WAC 173-400-040(5) 04/01/11	S	Any producer of an odor which may unreasonably interfere with any other property owner's use and enjoyment of his		2M

					1
			property must reduce these odors to a reasonable minimum		
2.1.7	WAC 173-400-040(6) 04/01/11	F	No person shall cause or permit the emission of any air contaminant if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business		2M
2.1.8	WAC 173-400-040(7) 11/03/14	F	SO ₂ < 1000 ppm @7% O ₂ (60 minute average)	RM6	6M
2.1.9	WAC 173-400-040(8) 11/03/14 40 CFR 60.12	F	No person shall conceal or mask an emission of an air contaminant		1M
2.1.10	WAC 173-400-200(2) 11/03/14	F	No source may use dispersion techniques or excess stack height to meet ambient air quality standards or PSD increment limitations		1M
2.1.11	WAC 173-400-205 06/02/95 WAC 173-400-205 12/29/12	F S	Varying the rate of emission of a pollutant according to atmospheric conditions is prohibited, except as directed according to air pollution episode regulations		1M
2.1.12	RCW 70.94.040 1/4/01	S	Causing air pollution in violation of Chapter 70.94 RCW is unlawful		1M
2.1.13	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 8.3	F	No open burning is permitted, except as allowed under WAC 173-425.		1M
	WAC 173-425, 04/13/00	S			

2.1.14	WAC 173-400-040(1) 11/03/14 RCW 70.94.154(1)	F	All emissions units are required to use RACT	1M
2.1.15	Voluntary Emissions Limit Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 1.2 WAC 173-400-091, 11/03/2014	F	Emissions of any single hazardous air pollutant (HAP) shall not exceed 9 tons per year. Total HAP emissions shall not exceed 22 tons per year. All yearly limits shall be quantified as a 12-month rolling total, rolled on a monthly basis.	6M

2.2 Hogged Fuel Boiler [rated @ 40k lbs steam/hr, controlled by multicyclone and ESP] TABLE 2.2

Condition Number	Applicable Requirement	Enforceability (Federal & State = F) (State Only = S)	Description	Reference Test Method, If Applicable	MRRR Reference
2.2.1*	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 5.3.3	F	Opacity as measured by COM shall be ≤ 10% (ten consecutive 6 minute averaging periods)		10M, 11M
2.2.2*	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 5.3.2	F	Opacity as measured visually shall be ≤ 10% averaged over 6 consecutive minutes	RM 9	3M
2.2.3*	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 5.3.1	F	$PM \le 0.030 \text{ gr/dscf}$ corrected to 7% O_2 or $\le 4.25 \text{ lbs/hr (fronthalf}$ and backhalf)	RM 5 and 202	7M, 10M, 11M
2.2.4	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 5.1	F	Steam production shall not exceed 215 million pounds per 12-month rolling period		8M
2.2.5	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 8.1	F	No backup fuel is allowed for the Hogged Fuel Boiler		5M
2.2.6	WAC 173-400-070(2)(b) 11/03/14	F	Hogged Fuel Boiler shall utilize RACT and shall be operated and maintained to minimize emissions		5M

2.2.7	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 8.2	F	No visible emissions from the Hogged Fuel Boiler are allowed beyond the property line	4M
2.2.8	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition s 5.4 and 8.7	F	The boiler and all associated equipment shall be operated in a manner consistent with the O&M manual, ash handling plan, and NOC application	5M
2.2.9	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 8.6	F	Approval Order and O&M Manual shall be in the working vicinity and available to employees in direct operation of the Hogged Fuel Boiler	5M
2.2.10	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 3.3, 4.2,5.6	F	O&M manual shall be developed, kept updated and followed	9М
2.2.11	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 8.4	F	Approval Order No. 15AQ-E608 Issued 07/21/15 becomes void if operation is discontinued for 18 months unless Ecology is notified in writing and approves	5M
2.2.12	40 CFR Part 64 Compliance Assurance Monitoring 64.7(b), 07/01/15	F	The permittee shall maintain monitoring equipment specified in 10M and 11M, including but not limited to, maintaining necessary parts for routine repairs of the equipment	5M
2.2.13	40 CFR \$63.11210(i)(1), \$63.11205(a), \$63.11223, \$63.11201(b), \$63.11223(a),	F	Conduct an initial performance boiler tune-up no later than 180 days after source commences operation as an area source.	12M

	\$63.11225(b)-(c), 07/01/15			
2.2.14	40 CFR 63 JJJJJJ Table 2(6) §63.11223(b) 07/01/15	F	Conduct biennial tune- ups every 2 years that shall be conducted no more than 25 months after the previous tune- up.	12M
2.2.15	40 CFR §63.11225(i)(1), §63.11201(b), §63.11214, 02/01/13 07/01/15	F	Perform a one-time energy assessment performed by a qualified energy assessor.	13M
2.2.16	40 CFR §63.11225(g) 07/01/15	F	If you have taken a permit limit that resulted in you being subject to subpart JJJJJJ, you must provide notice of the date upon which you took a permit limit within 30 days of the change.	14M
2.2.17	40 CFR \$63.11225(a)(2), 07/01/15	F	An Initial Notification must be submitted within 120 days after the source becomes subject to the standard.	14M
2.2.18	40 CFR §63.11214(b), §63.11214(c), 07/01/15	F	Submit an initial Notification of Compliance Status report that indicates you conducted a boiler tune-up and energy assessment.	12M, 13M

2.3 Natural Gas Boiler[rated @ 20k lbs steam/hr]

TABLE 2.3

Condition Number	Applicable Requirement	Enforceability (Federal & State = F) (State Only = S)	Description	Reference Test Method, If Applicable	MRRR Reference
2.3.1	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 3.2.6	F	Opacity shall not exceed 10%, averaged over a 10 minute period	RM 9	3M
2.3.2*	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 3.2.3	F	PM emissions shall not exceed 0.01 gr/dscf @ 7% O ₂ or 0.272 lbs/hr	RM 5 and 202	6M
2.3.3	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 3.2.1	F	NO _X emissions shall not exceed 40 ppm, dry @ 3% O ₂ or 1.28 lbs/hr	RM 7	15M
2.3.4*	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 3.2.2	F	SO _X emissions shall not exceed 1 ppm or 0.017 lbs/hr @7% O ₂	RM 6	6M
2.3.5	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 3.2.4	F	VOC emissions shall not exceed 0.453 lbs/hr	RM 25A or 18	6M
2.3.6	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 3.2.5	F	CO emissions shall not exceed 4.08 lbs/hr	RM 10	6M
2.3.7	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 3.1 40 CFR 60 Subpart Dc 40 CFR 60.48c(g), 40 CFR 60.48c(i), 07/01/15	F	Boiler steam production shall be limited to 175.2 million pounds of steam per year based on natural gas usage of 217 MMcf/yr. Two years of production records shall be available for review.		16M
2.3.8	40 CFR 60.7(a)(4) 07/01/15	F	Any modification to plant or operating procedures which may increase an emission rate shall be reported to Ecology		18M

2.3.9	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 8.1	F	No backup fuel is allowed	5M
2.3.10	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 8.2	F	No visible emissions from natural gas boiler are allowed beyond the property line	4M
2.3.11	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 8.6	F	Approval Order and O&M Manual shall be in the working vicinity and available to employees in direct operation of the natural gas boiler	5M
2.3.12	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 8.7 40 CFR 60.11(d) 07/01/2015	F	Operation of equipment shall be conducted in a manner consistent with good air pollution control practice for minimizing emissions as well as with the NOC application and O&M Manual	5M
2.3.13	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 8.4	F	Approval Order No. 15AQ-E608 Issued 07/21/15 becomes void if operation is discontinued for 18 months unless Ecology is notified in writing and approves	5M
2.3.14	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 3.3	F	O&M manual shall be developed, kept updated and followed	17M

2.4 Lumber Drying Kilns

The Lumber Drying Kilns and all sources of air emissions associated with the process are subject to those conditions, emission standards, and work practices included in Section 1. "Standard Conditions", Section 2.1 "Facility Wide" and the associated Monitoring Recordkeeping and Reporting Requirements in Section 3.

TABLE 2.4

Condition Number	Applicable Requirement	Enforceability (Federal & State = F) (State Only = S)	Description	Reference Test Method, If Applicable	MRRR Reference
2.4.1	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 2.1 WAC 173-400-091, 11/03/2014	F	Lumber drying kilns shall not exceed 110,000,000 board feet per consecutive 12-month rolling period.		1M
2.4.2	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 2.2 WAC 173-400-091, 11/03/2014	F	Maximum dry bulb operating temperature of heated air entering each lumber drying kiln shall not exceed 200°F.		1M

2.5 Wood Residuals Collection & Transport System (excluding Planer and Truck Bin baghouses)

The Wood Residuals Collection & Transport System and all sources of air emissions associated with the processes (excluding Planer and Truck Bin baghouses) are subject to those conditions, emission standards, and work practices included in Section 1. "Standard Conditions", Section 2.1 "Facility Wide Requirements" and the associated Monitoring Recordkeeping and Reporting Requirements in Section 3.

2.6 Planer Baghouse and Truck Bin Baghouse

TABLE 2.6

Condition Number	Applicable Requirement	Enforceability (Federal & State = F) (State Only = S)	Description	Reference Test Method, If Applicable	MRRR Reference
2.6.1	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 4.1.1	F	Opacity from each baghouse exhaust shall not exceed 5%, averaged over a 6 minute period	RM 9	3M

2.6.2	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 4.4.2	F	No visible emissions shall be allowed from either baghouse catch system.	RM 9	3M
2.6.3	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 4.1.2	F	Particulate Matter emissions from each baghouse exhaust shall not exceed 0.010 gr/dscf exhaust gas	RM 5	19M
2.6.4	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 4.2	F	A site specific O&M manual for all equipment with potential to affect emissions to the atmosphere shall be developed, kept updated and followed		19M
2.6.5	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 4.4.1	F	Operation of planer cyclones or shavings truck bins without the baghouses operating shall be prevented by an electrical interlock or some other fail safe device, or an administrative requirement stated in the O&M manual		19M
2.6.6	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 4.4.2	F	The material collected by the planer baghouse shall be routed through rotary airlocks to an enclosed catch system. The material (catch) collected by the truck bin baghouse falls directly into the truck bin.		19M
2.6.7	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 4.4.3	F	The catch from both baghouses will be collected and disposed of in accordance with good operating practices and local solid waste requirements		5M

2.6.8	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 8.4	F	Approval Order No. 15AQ-E608 becomes void if operation is discontinued for 18 months unless Ecology is notified in writing and approves	5M
2.6.9	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 8.6	F	Approval Order shall be in the working vicinity and available to employees in direct operation of the baghouses	5M
2.6.10	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 8.7	F	Operation of equipment shall be conducted in a manner consistent with information included in NOC application and O&M Manual	5M
2.6.11	Approval Order No. 15AQ-E608 Issued 07/21/15 Approval Condition 4.4.4	F	Application of water or comparative means will be used to control fugitive dust generated due to traffic on unpaved on-site roads	5M

2.7 Cummins 185 hp Diesel Emergency Fire Pump Engine

Condition Number	Applicable Requirement	Enforceability (Federal & State = F) (State Only = S)	Description	Reference Test Method, If Applicable	MRRR Reference
2.7.1	40 CFR Part 63 Subpart ZZZZ 63.6603(a) and Row 4.a. of Table 2d 07/01/2015 WAC 173-400-	F S	The fire pump engine oil and filter shall be changed every 500 hours of operation, or annually, whichever comes first Or Utilize an oil sampling		20M
	075(2),(5) 11/28/2012	5	program per 40 CFR 63.6625(j)		

2.7.2	40 CFR 63.6603(a) and Row 4.b. of Table 2d to Subpart ZZZZ of Part 63 07/01/2015 WAC 173-400- 075(2),(5) 11/28/2012	F S	The fire pump engine air cleaner shall be inspected every 1,000 hours of operation or annually, whichever comes first, and replaced as necessary.	20M
2.7.3	40 CFR 63.6603(a) and Row 4.c. of Table 2d to Subpart ZZZZ of Part 63 07/01/2015 WAC 173-400- 075(2),(5) 11/28/2012	F S	The fire pump engine hoses and belts shall be inspected every 500 hours of operation or annually, whichever comes first, and replace as necessary.	20M
2.7.4	40 CFR 63.6640(f)(2) 07/01/2015 WAC 173-400- 075(2),(5) 12/29/2012	F S	The fire pump engine may be operated for up to 100 hours per year for the purpose of maintenance checks and readiness testing, as recommended by the entities listed in 40 CFR 63.6640(f)(2)(i), (ii), or (iii) or other nonemergency situations.	20M
2.7.5	40 CFR 63.6640(f)(4) 07/01/2015 WAC 173-400- 075(2),(5) 12/29/2012	F	The fire pump engine may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours are counted toward the 100 hours provided for maintenance and testing. The 50 hours per calendar year for non-emergency response cannot be used for peak shaving or to generate income for supplying power to an electric grid or otherwise supply power as part of a financial arrangement with another entity, except as allowed under 40 CFR 63.6640(f)(iii).	20M

				,	
2.7.6	40 CFR 63.6625(h) 07/01/2015 WAC 173-400- 075(2),(5) 12/29/2012	F S	During periods of startup, minimize the fire pump engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading to the engine, not to exceed 30 minutes.		1M
2.7.7	40 CFR 63.6605(b) 07/01/2015 WAC 173-400- 075(2),(5) 12/29/2012	F S	Operate and maintain the fire pump engine, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.		1M
2.7.8	40 CFR 63.6625(e), 40 CFR 63.6640(a) and Row 9 of Table 6 to Subpart ZZZZ of Part 63 07/01/2015 WAC 173-400- 075(2),(5) 12/29/2012	F S	Operate and maintain the fire pump engine and after-treatment control device (if any) according to manufacturer's emission-related written operation and maintenance instruction, or alternatively, develop and follow your own maintenance plan which shall provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.		20M
2.7.9	40 CFR 63.6625(f) 07/01/2015 WAC 173-400- 075(2),(5) 12/29/2012	F S	The fire pump engine shall have a non-resettable hour meter if one is not already installed.		20M

3. Monitoring, Recordkeeping, and Reporting Requirements (MRRR)

[WAC 173-401-630(1), WAC 173-401-615(1), (2) 12/31/12]

1M. The permittee shall conscientiously monitor site operations and promptly report any deviations. At least once every twelve (12) months, the permittee shall review actual operations and any other relevant information to determine if facility operations are being conducted in accordance with each specific requirement.

The permittee shall maintain records that include the date such reviews occur, the name of the person conducting the review, the information reviewed, summary information on any deviations identified and date and time when corrective action was initiated and completed.

[WAC 173-401-615(1)(b), WAC 173-401-615(1)(b), 12/31/12]

- **2M.** The permittee shall maintain records of all complaints received. Ecology shall be notified within three (3) working days of receipt of any complaints. The permittee shall address and respond to all complaints within three (3) working days of receipt of the complaint. The recordkeeping shall include the following with regard to the complaint and any 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, and
 - 5) Corrective action taken, and the results of such action.

[WAC 173-401-615(1)(b), 12/31/12]

- **3M.** The permittee shall conduct monitoring in accordance with the following.
 - 1) At least once per month, as well as any time excess visible emissions are observed, the permittee shall perform surveys for the purpose of observing all emission units that are sources of potential visible and/or PM emissions to which standards apply facility-wide as well as those emission units and activities for which this MRRR is specified in the "MRRR Reference" column in the above tables. Insignificant emissions units are not subject to this MRRR requirement.

Each survey shall be performed as follows:

- a) The survey shall be conducted 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 shall be at least 15 feet but not more than ½ mile from the source.
- b) The survey shall be conducted while the relevant emission unit as well as the associated facility process is in normal operation.
- c) The observer will be educated 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 shall consist of a minimum of four (4) consecutive 15-second visual observations of each stack or emission point to identify whether the emission point under observation exhibits

- visible emissions. The observer shall look away from the emission point under observation between each observation in order to rest their eyes.
- e) The permittee shall develop a standard form to be used for the visible emissions surveys described above. A copy of the developed form shall be provided to Ecology.
- 2) Upon completion of the visual survey, the permittee's corrective actions shall be governed by the following:
 - a) If visible emissions are observed to be zero, no corrective action is required.
 - b) If visible emissions are observed, the following actions shall be taken, as described below:
 - i) As soon as possible, but no later than 24 hours after visible emissions are observed, the permittee shall verify that all equipment which may affect emissions is performing its normal, designed function and being operated according to standard procedures. If any equipment is not performing as described, corrective action shall be initiated within 24 hours after the original observation of visible emissions. The corrective action taken shall return the equipment to normal operation as soon as possible and be designed to prevent the likely recurrence of the cause of the deviation.
 - a. If the corrective action taken results in a return to conditions under which visible emissions are not observable via the method outlined in 1) above within the 24 hour window after visible emissions were originally observed, no further corrective action is required.
 - b. If, after corrective action is taken, visible emissions are still observed, or if the necessary corrective action requires a period of time beyond the 24 hour window, the permittee shall perform ii):
 - ii) The permittee shall perform, or have performed, RM 9 on the source of the emissions. The RM 9 test shall be conducted only by personnel certified to perform RM 9 in accordance with EPA guidelines. The test shall occur as soon as possible, but no later than forty-eight (48) hours after the original observation of visible emissions.
 - a. If the visible emissions as determined by RM 9 do not exceed the applicable standard, no further corrective action is required.
 - b. If a violation of any applicable opacity standard is documented, the permittee shall perform iii):
 - iii) If a violation of any applicable opacity standard is documented, appropriate and timely action shall be initiated (as soon as possible, but no later than 24 hours after discovery of the violation via RM 9 test) to identify and correct the problem causing the opacity. The corrective action taken shall return the equipment to normal operation as soon as possible and be designed to prevent the likely recurrence of the cause of the violation. Once corrective action has been taken to solve the problem, the permittee shall perform, or have performed, RM 9 on the source of emissions in order to demonstrate re-establishment of normal operation. Taking corrective action does not relieve the permittee from complying with the underlying condition, emission standard or work practice, nor does it relieve the permittee from the obligation to report any permit deviations as required in Standard Condition 1.13.1
- 3) The permittee shall conduct <u>recordkeeping</u> in accordance with the following.
 - a) The permittee shall maintain records of all RM 9 tests performed for a period of five (5) years. This recordkeeping requirement shall be satisfied by keeping the original RM 9 test form.

- b) The permittee shall maintain a list of site personnel who have been educated as described in 1), c) above.
- c) Recordkeeping with regard to each deviation shall include the following:
 - i) Time, date, and duration of the deviation,
 - ii) Cause of the deviation,
 - iii) Estimate of excess emissions and magnitude of deviation, and
 - iv) Corrective action taken, and the results of such action.
- 4) The permittee shall conduct <u>reporting</u> in accordance with the following.
 - a) Copies of all RM 9 test forms which either document a deviation or re-establishment of normal operation following a deviation shall be submitted to Ecology as part of the monthly deviation reports as required by Standard Condition 1.13.1. In addition to the RM 9 form, reporting shall also include copies of the visible emission observation form(s) as well as the information required under recordkeeping under 3), c) above. The permittee is not required to submit RM 9 forms for tests conducted under 2), b), ii) above, which do not document a deviation or violation.
 - b) Upon discovery that the monitoring as designed is insufficient to provide indications of all deviations, the permittee shall notify Ecology of the monitoring deficiency.

[WAC 173-401-615(1)(b), & (3), 12/31/12], Conditions 2.1.1, 2.3.1, 2.6.2 [WAC 173-401-630(1), 12/31/12], Conditions 2.6.1

4M. At least once per month, as well as any time visible emissions are observed, the permittee shall perform brief, walk-around surveys for the purpose of determining the presence of visible emissions crossing the facility site property boundary. The surveys shall be conducted while the facility is in operation, and shall include observation for any visible emissions, including fugitive emissions, regardless of the source. Recordkeeping shall include information for each survey indicating the date the survey was performed, the name of the person performing the survey, the weather at the time of the survey, and an indication of whether any visible emissions were observed to cross the property boundary. Reporting shall consist of monthly reporting of deviations and annual certification of compliance as described in Standard Condition 1.13. Any monthly deviation reports documenting visible emissions observed to cross the property boundary shall include the time, date and duration of the deviation, a description of the cause of the visible emissions, the corrective action taken, and the results of the corrective action.

[WAC 173-401-615(1)(b), 12/31/12]

5M. At least once every twelve (12) months, the permittee shall perform a complete review of the Operation and Maintenance manual, Ash Handling and Disposal Plan, Fugitive Dust Control Plan and the original Notice of Construction Order and associated application materials submitted to Ecology as appropriate for each affected emission unit and associated equipment. The purpose of this review shall be to verify that the emission unit and associated equipment is being operated in accordance with the documents stated above and with good air pollution control practices in mind.

At least once every six (6) months, the permittee shall perform a review of the operation and maintenance parameters as included in the Operation and Maintenance manual for each affected emission unit and associated equipment.

The permittee shall 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 shall initiate corrective action

within two (2) business days. All such discoveries shall be reported to Ecology as required by Standard Condition 1.13 of this permit.

[WAC 173-401-615(1)(b), 12/31/12]

6M. <u>Semi-Annually</u> – As part of the semi-annual monitoring report, the permittee shall submit parametric monitoring data for parameters that are used to calculate emissions. This may include actual hours of operation, actual steam production, etc.

Annually – As part of the annual emissions inventory submittal required under Standard Condition 1.13.4, emissions shall be quantified by multiplying the appropriate recorded operating parameter (fuel usage, hours of operation, steam production, etc..) by an emission factor derived from the most recent source testing. If test-derived factors are unavailable, use the most recent emission factor published by USEPA. In the event that the most recent published data provides a range of emission factors, the calculation shall be performed using the most conservative factor within the provided range. Use of less conservative emission factors may be used only upon written approval by Ecology. In the event that USEPA emission factors are either inappropriate or unavailable, the permittee shall propose an alternative emission factor (or emission estimation method) that may be used upon written approval by Ecology.

Calculations should be adjusted for percent oxygen as required by the applicable requirement and should indicate pollutant emission rate and concentration in the same units as the limit(s) specified in the applicable requirement(s). The emission inventory submittal shall include a statement clearly indicating the emission factor that is being used, justification for the use of the emission factor, clear identification of all operating parameters used in the calculation method, and an example of the calculation method used.

[WAC 173-401-615(1)(b), 12/31/12]

HOGGED FUEL BOILER

7M. Testing for the Hogged Fuel boiler as described by the applicable requirement shall be performed at least once every five (5) years, unless another timeframe is approved by Ecology. In the event of Hogged Fuel Boiler temporary shutdown for an extended period of time due to market conditions, a written request may be submitted to Ecology to allow performance testing within 90 days of initial Hogged Fuel Boiler re-start. Ecology must receive notice of the Hogged Fuel Boiler shutdown and restart.

The following conditions shall apply to the testing:

- 1) Particulate matter shall be reported for fronthalf (RM 5) and backhalf (RM 202).
- 2) The testing will be conducted with the boiler at a minimum of ninety (90) percent of maximum production rate.
- 3) The testing will consist of two runs at normal boiler operation, one run with a grate ash cleaning evolution in progress, and one run with a soot blowing evolution in progress.
- 4) RM 3 shall utilize multipoint integrated sampling for O₂, carbon dioxide, and carbon monoxide.
- 5) The test report shall be sent to Ecology within sixty (60) days after the testing.
- 6) The COMS shall be installed and operating prior to and during source testing.
- 7) Alternate testing may be proposed in writing by the permittee and must be approved in writing by Ecology.

<u>Semi-Annually</u> – As part of the semi-annual monitoring report, the permittee shall submit parametric monitoring data for parameters that are used to calculate emissions. This may include actual fuel usage, actual hours of operation, actual steam production, etc.

<u>Annually</u> – As part of the annual emissions inventory submittal required under Standard Condition 1.13.5, emissions shall be quantified by multiplying the appropriate recorded operating parameter (fuel usage, hours of operation, steam production, etc..) by an emission factor derived from the most recent source testing.

Calculations should be adjusted for percent oxygen or percent carbon dioxide as required by the applicable requirement and should indicate pollutant emission rate and concentration in the same units as the limit(s) specified in the applicable requirement(s). The emission inventory submittal shall include a statement clearly indicating the emission factor that is being used, justification for the use of the emission factor, clear identification of all operating parameters used in the calculation method, and an example of the calculation method used.

[WAC 173-401-615(1)(b), WAC 173-401-630(1), 12/31/12], [Approval Order No. 15AQ-E608, Issued 07/21/2015, Approval Condition 5.7.2]

- **8M.** The following conditions shall apply to the monitoring, recordkeeping, and reporting for the Hogged Fuel Boiler:
 - 1) The following monitoring equipment shall be maintained in good operating condition:
 - a) Instrumentation on the electrostatic precipitator as follows: inlet temperature gage, field voltmeter gage, secondary amperage meter, primary amperage indication, and the ability to monitor the spark rate or count.
 - b) A gauge on the multiclone to measure differential pressure.
 - 2) The following <u>recordkeeping</u> specific to the Hogged Fuel Boiler shall be retained for a period of five (5) years and kept in an organized, legible manner readily available for inspection by Ecology personnel.
 - a) Multiclone differential pressure, recorded at least once per day.
 - b) Source testing, inspection, and maintenance records.
 - c) Monthly steam production records.
 - d) O&M instructions.
 - 3) Reporting specific to the Hogged Fuel Boiler shall be conducted in accordance with the following.
 - a) Total steam production for each semi-annual reporting period shall be submitted in accordance with Standard Condition 1.13 Reporting.

[Approval Order No. 15AQ-E608, Issued 07/21/2015, Approval Conditions 5.5.2, 5.5.3, 5.6, 5.7.3], [WAC 173-401-615(2)(c), WAC 173-401-630(1), 12/31/12]

- **9M.** The following <u>recordkeeping</u> specific to the Hogged Fuel Boiler O&M manual shall be retained in an upto-date manner, well organized, and easily accessible for inspection by Ecology personnel.
 - 1) Normal operating parameters for the unit,
 - 2) A maintenance schedule for the unit,
 - 3) Monitoring and recordkeeping requirements,
 - 4) A description of the monitoring procedures,
 - 5) Actions for abnormal control system operation,
 - 6) Operational requirements shall be identified that will prevent steam generator operations unless the electrostatic precipitator is online.

[Approval Order No. 15AQ-E608, Issued 07/21/2015, Approval Condition 5.6], [WAC 173-401-630(1), 12/31/12]

- **10M.** Compliance Assurance Monitoring for the Hogged Fuel Boiler.
 - 1) Secondary Voltage
 - a) The permittee shall conduct <u>monitoring</u> in accordance with the following:
 - i) Equipment shall be installed, operated and maintained that monitors, and displays digitally, electrostatic precipitator secondary voltage in kilovolts for both transformer/rectifier sets (T/R 1 and T/R 2).
 - ii) At least once per day, the permittee shall evaluate the data obtained through recordkeeping as described in 1) b) ii) below with respect to the following criteria:
 - a. The daily average secondary voltage shall be greater than the following trigger limits for any two (2) consecutive days.
 - i. For T/R 1, the trigger limit shall be 20 kV.
 - ii. For T/R 2, the trigger limit shall be 30 kV.
 - b. The secondary voltage as displayed on for T/R 1 shall be less than that of T/R 2 for any six (6) consecutive recorded values (2 day period).
 - iii) Under conditions that meet the criteria outlined in 1) a) ii.) above, no corrective action is required under CAM.
 - iv) In the event that either of the criteria outlined in 1) a) ii.) above are not met, an excursion has occurred, and corrective action consistent with the following shall be taken.
 - a. As soon as possible, but no later than 4 hours after discovery of the excursion, the permittee shall initiate corrective actions that are designed to return the equipment to normal operation as soon as possible and to prevent the likely recurrence of the cause of the excursion.
 - b. Corrective action taken may include, but will not be limited to, checking rappers and vibrators for proper operation, checking multiclone and rotary screen for possible problems, checking bottom hoppers for buildup, checking ESP electrical systems, increasing sonic blowdown, turning on the bottom vibrator, dumping the T/R set for an appropriate amount of time, obtaining manufacturer advice, and ESP shutdown and internal inspection along with appropriate subsequent maintenance and/or repair.
 - v) The secondary voltmeter shall be calibrated annually.
 - b) The permittee shall conduct recordkeeping in accordance with the following.
 - i) At least three (3) times per day, the permittee shall record the values for secondary voltage for both T/R 1 and T/R 2 as displayed on the equipment provided.
 - ii) At least once per day, the average secondary voltage for each of the T/R sets shall be calculated by computing the mean of the recorded values for that day.
 - iii) In the event of an excursion from the criteria outlined in 1) a) ii) above, the permittee shall maintain records documenting any ESP corrective action taken, and the results of such action. The records shall be retained in a well-organized manner and easily accessible for inspection by Ecology personnel.
 - c) The permittee shall conduct reporting in accordance with the following:

- i) In the event of an excursion from the criteria outlined in 1) a) ii) above, the permittee shall submit a report as part of, or attached to, the monthly deviation report as described in Standard Condition 1.13.1. The report shall include the appropriate data as recorded documenting the date, time and duration of the excursion, the magnitude of the excursion, an estimate of any excess emissions, a description of the corrective action taken, and the results of the corrective action.
- ii) Upon discover that the monitoring as designed is insufficient to provide indications of all excursions, the permittee shall notify Ecology of the monitoring deficiency.

2) Visible Emissions

- a) The permittee shall conduct monitoring in accordance with the following.
 - i) A continuous emission monitor system to measure and record visible emissions in % opacity (COMS) shall be installed, operated and maintained on the exhaust of the Hogged Fuel Boiler, after the ESP. The COMS shall conform to all provisions of Title 40, CRF Part 60, Appendix B, Performance Specification 1.
 - ii) Visible emissions shall be measured and recorded continuously by the COMS. Visible emission monitoring data shall be reviewed every day of operation to determine if any measured visible emissions exceeded 10% opacity for any six (6) minute interval(s) since the previous day's review.
 - a) If visible emissions do not exceed 10% opacity, no corrective action is required.
 - b) If visible emissions exceed 10% opacity, an exceedance of the visible emission standard has occurred and the permittee shall perform the following:
 - i) As soon as possible, but no later than 4 hours after discovery that measured visible emissions exceeded 10% opacity, the permittee shall initiate corrective actions that are designed to return the equipment to normal operation as soon as possible and to prevent the likely recurrence of the cause of the exceedance. Corrective action may include, but not be limited to, checking rappers and vibrators for proper operation, checking multiclone and rotary screen for possible problems, checking bottom hoppers for buildup, checking ESP electrical systems, increasing sonic blowdown, turning on the bottom vibrator, dumping the T/R set for an appropriate amount of time, obtaining manufacturer advice, and ESP shutdown and internal inspection along with appropriate subsequent maintenance and/or repair.
 - iii) The COMS shall be operated and calibrated using quality assurance procedures conforming to EPA 340/1-86-010 Recommended Quality Assurance Procedures of COMS.
- b) The permittee shall conduct recordkeeping in accordance with the following.
 - i) Continuous visible emission data shall be retained onsite and readily accessible for Ecology upon request.
 - ii) COMS calibration records shall be retained onsite and readily accessible for Ecology upon request.
 - iii) In the event of an exceedance per 2) a) ii) b) above, the permittee shall maintain records documenting corrective action taken and the results of such corrective action. The records shall be retained in a well-organized manner and easily accessible for inspection by Ecology.
- c) The permittee shall conduct reporting in accordance with the following.

i) In the event of a visible emission exceedance measured by the COMS, the permittee shall submit a report as part of, or attached to, the monthly deviation report as described in Standard Condition 1.13.1. The report shall include the appropriate data as recorded documenting the date, time and duration of the exceedance, the magnitude of the exceedance, an estimate of any excess emissions, probable cause of the exceedance, a description of the corrective action taken and the results of the corrective action taken.

[40 CFR 64.3, 64.4(d), 64.7(d), 64.7(e), 64.8, 07/01/01] [Approval Order No. 15AQ-E608, Issued 07/21/2015, Approval Condition 5.5.1] [WAC 173-401-615(1)(b), 12/31/12]

- **11M.** Monitoring, Recordkeeping, and Reporting as required by 40 CFR 64 Compliance Assurance Monitoring for the Hogged Fuel Boiler shall be subject to the following general conditions:
 - 1) The owner or operator shall conduct all <u>monitoring</u> in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emission unit is operating, with the following qualifications:
 - a) Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement.
 - b) The owner or operator shall use all data collected during all other periods in assessing the operation of the control device and associated control system.
 - c) "Monitoring malfunction" is any sudden, infrequent, not reasonably preventable failure of the monitor to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

[40 CFR 64.7(c), 07/01/01], [40 CFR 64.7(a), 07/01/01]

- 2) Semi-annual CAM monitoring <u>reports</u> shall include the following:
 - a) Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions or violations, as applicable, and the corrective actions taken,
 - b) Summary information on the number, duration, and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other calibration checks), and
 - c) A description of any actions taken during the reporting period to implement any QIP's in effect. [40 CFR 64.9(a), 07/01/01]
- 3) The following conditions shall apply to all CAM <u>recordkeeping</u>:
 - a) The owner or operator shall 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 supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).
 - 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), 07/01/01]

An initial tune-up of the Hogged Fuel Boiler is due no later than 180 days after source commences operation as an area source. Subsequent biennial tune-ups shall be conducted no more than 25 months

after the previous tune-up. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup. Tune-up shall be conducted per 40CFR63.11223(b).

- 1) The permittee shall prepare, by March 1, of each biennial period and maintain onsite (submit if requested by Ecology or the EPA) a biennial tuning and compliance certification report containing:
 - Company name and address
 - Statement by the responsible official, with official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. Report must include the following certification(s) of compliance, as applicable, and be signed by the responsible official:
 - o "This facility complies with the requirements in §63.11223 to conduct a biennial tune-up."
 - o For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in the affected unit."
 - The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
 - A description of any corrective actions taken as part of the tune-up of the boiler.
 - The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period.
- 2) The permittee shall also maintain:
 - a) Tune-up records identifying each boiler, the date of tune-up, the procedures followed for tune-up, and the manufactured specifications to which the boiler was tuned.
 - b) Records of the occurrence and duration of each malfunction of the boiler, or of the ESP.
 - c) Records of actions taken during periods of malfunction to minimize emissions in 40 CFR §63.11205(a), including corrective actions to restore malfunctioning boiler or ESP to its normal or usual manner of operation.
- The permittee must submit a signed certification in the Notification of Compliance Status report that an initial tune-up of the boiler was conducted.
- [40 CFR §63.11210(i)(1); §63.11201(b); §63.11223(a); §63.11223 (b); §63.11225(b); §63.11225(c); §63.11214(b), 07/01/15]
- 13M The permittee shall achieve compliance with the energy assessment requirement no later than 180 days after source commences operation as an area source and be performed by a qualified energy assessor. Energy assessment shall be conducted per 40CFR63 subpart JJJJJJ Table 2 subcategory 16.

[40 CFR §63.11210(i)(1), 07/01/15]

The permittee must submit a signed certification in the Notification of Compliance Status report that an energy assessment of the boiler and its energy use systems was completed and is an accurate depiction of your facility.

[40 CFR §63.11214(c), 07/01/15] [40 CFR 64.9(b), 07/01/15]

14M Submit the Initial Notification to the administrator no later than 120 days after the source becomes subject to 40 CFR 63 subpart JJJJJJ.

[40 CFR §63.11225(a)(2), 07/01/15]

The permittee shall provide notice of the date upon which it took a permit limit within 30 days of the change. The notification must identify:

- 1) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that took the permit limit, and the date of the notice.
- 2) The date upon which the permit limit occurred.

[40 CFR §63.11225(g), 07/01/15]

NATURAL GAS BOILER

15M. Testing for the natural gas boiler as described by the applicable requirement shall be performed at least once every five (5) years.

<u>Semi-Annually</u> – As part of the semi-annual monitoring report, the permittee shall submit parametric monitoring data for parameters that are used to calculate emissions. This may include actual fuel usage, actual hours of operation, actual steam production, etc.

<u>Annually</u> – As part of the annual emissions inventory submittal required under Standard Condition 1.13.4, emissions shall be quantified by multiplying the appropriate recorded operating parameter (fuel usage, hours of operation, steam production, etc..) by an emission factor derived from the most recent source testing.

Calculations should be adjusted for percent oxygen or percent carbon dioxide as required by the applicable requirement and should indicate pollutant emission rate and concentration in the same units as the limit(s) specified in the applicable requirement(s). The emission inventory submittal shall include a statement clearly indicating the emission factor that is being used, justification for the use of the emission factor, clear identification of all operating parameters used in the calculation method, and an example of the calculation method used.

[WAC 173-401-615(1)(b), 12/31/12], [Approval Order No. 15AQ-E608, Issued 07/21/2015, Approval Condition 3.4.3]

- **16M.** Recordkeeping and reporting required for the natural gas boiler:
 - 1) Natural gas boiler specific <u>records</u> shall be retained including the following information. The information shall be retained for five (5) years and kept in a legible and readily accessible manner for inspection by Ecology personnel in accordance with Standard Condition 1.6 Inspection and Entry.
 - a) Testing and inspection records.
 - b) Monthly Steam production records.
 - c) Monthly and annual natural gas usage records 40 CFR 60.48c(g).
 - d) Organized O&M instructions and maintenance records.
 - 2) Reporting specific to the natural gas boiler shall be conducted in accordance with the following.
 - a) Total natural gas usage and steam production for each semi-annual reporting period shall be submitted in accordance with Standard Condition 1.13 Reporting.

[Approval Order No. 15AQ-E608, Issued 07/21/2015, Approval Condition 3.3, 3.4, 6.3, 6.4, 6.5, 6.6], [WAC 173-401-615(2)(c), WAC 173-401-630(1), 12/31/12], [40 CFR 60.48c(g), 07/01/15]

- **17M.** The following <u>recordkeeping</u> specific to the natural gas boiler O&M manual shall be retained in an up-to-date manner, well organized, and easily accessible for inspection by Ecology personnel.
 - 1) Normal operating parameters for the unit,

- 2) A maintenance schedule for the unit.
- 3) Monitoring and recordkeeping requirements,
- 4) A description of the monitoring procedures,
- 5) Actions for abnormal control system operation.

[Approval Order No. 15AQ-E608, Issued 07/21/2015, Approval Condition 3.3], [WAC 173-401-630(1), 12/31/12]

18M. In the event of any physical or operational change to the natural gas boiler which may increase the emission rate of any air pollutant to which a standard applies (unless change is specifically exempted under an applicable subpart or in §60.14(e)), permittee shall provide notice as required. This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. Ecology may request additional relevant information subsequent to this notice. These requirements are in addition to any pre-construction review requirements as outlined under Standard Condition 1.20.

[40 CFR 60.7(a)(4), 07/01/15]

PLANER AND TRUCK BIN BAGHOUSES

- **19M.** The following conditions shall apply to the monitoring, recordkeeping and reporting required for the planer and truck bin baghouses;
 - 1) The following monitoring equipment shall be installed, operated and maintained in good condition:
 - a) A differential pressure gauge across the inlet side and outlet side of the baghouse.
 - b) A gauge to measure the vacuum pressure of the suction fan on the planer baghouse,
 - c) Access ports shall be installed prior to any required future testing.
 - 2) The following <u>records</u> for each baghouse shall be retained in an up-to-date manner, well organized and easily accessible for inspection by Ecology, and contain the following:
 - a) The nature and details of any emergency or other situation (date/time, duration, excess emissions estimate, cause, corrective action and results of corrective action), which includes situations where the planer cyclones or the planer shavings truck bins were operated while any portion of the baghouse was not functioning properly.
 - b) Any performance test results.
 - c) O&M Manual, maintenance schedule, and maintenance records.
 - d) Baghouse bag failure records, which show the locations of failed socks in relation to baghouse configuration, and their date of replacement.
 - e) Description of all monitoring procedures, instrumentation, and indicator ranges, frequency of monitor data collection, records of monitoring equipment readings, and any corrective actions taken if monitoring equipment readings fall outside specified ranges.
 - 3) The following <u>reports</u> shall be sent to Ecology within 30 days following the end of the month during which the upset occurred;

- a) The nature and details of any emergency or other upset resulting in excess emissions which includes situations where the planer cyclones or the planer shavings truck bins were operated while any portion of the baghouse was not functioning properly. Reports shall include:
 - i. Date and time of the upset
 - ii. Duration of the upset
 - iii. Estimate of excess emissions during the upset
 - iv. Cause of the upset
 - v. Corrective action taken
 - vi. Results of corrective action
- b) The results of any performance testing shall be sent no later than 60 days following the testing. [Approval Order No. 15AQ-E608, Issued 07/21/2015, Approval Conditions 4.3, 6.5, 6.6, 6.7, and 7], [WAC 173-401-630(1), 12/31/12]

CUMMINS DIESEL FIRE PUMP ENGINE

- **20M.** The following monitoring, recordkeeping and reporting are required for the Cummins diesel fire pump engine.
 - 1) The following monitoring and recordkeeping will be performed:
 - a) Records of hours of engine operation as recorded through the non-resettable hour meter.
 - b) Records of how many hours are spent for emergency operation, including what classified the operation as emergency, and how many hours are spent for non-emergency operation.
 - c) If an oil analysis program is used in order to extend the specified oil change requirement, records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.
 - d) Records of all required maintenance performed on the air pollution control and monitoring equipment.
 - e) Records of the maintenance conducted on the engine in order to demonstrate that the engine and after-treatment control device (if any) was operated and maintained according to the maintenance plan.
 - f) If the engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements (oil and filter change, inspections of air cleaners, hoses or belts required in 2.7.2, 2.7.3, 2.7.4), or if performing the management practice would otherwise pose an unacceptable risk under federal, state or local law, the management practice shall be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state or local law has abated.
 - 2) The following semi-annual monitor reporting will be performed:
 - a) any failure to perform timely management practices required in 2.7.2, 2.7.3 and 2.7.4 for any reasons afforded by 17M 1) f). Report also the federal, state or local law under which the risk was deemed unacceptable.

- b) any instance in which the requirements in Table 8 to 40 CFR 63, Subpart ZZZZ are not met.
- c) any deviations as defined in 40 CFR 63, Subpart ZZZZ.

[40 CFR 63.6625(d), (e), (f) and (i), footnote 1 and 2 of Table 2d to Subpart ZZZZ of Part 63,40 CFR 63.6640(b) and (e), 40 CFR 63.6650(f), and Table 8 to Subpart ZZZZ of Part 63, 07/01/15] [WAC 173-400-075, 12/29/12] [WAC 173-401-630(1), 12/31/12]

LUMBER DRYING KILNS

- **21M.** The following records for the Lumber Drying Kilns shall be promulgated and retained on site by the permittee in an easily accessible up-to-date manner and made accessible for inspection by Ecology upon request.
 - 1) Records of monthly lumber throughput for each lumber drying kiln.
 - a. Records shall include, at a minimum:
 - i. Clear identification of which individual kiln the information is associated with.
 - ii. Start date kiln is charged.
 - iii. Number of board feet placed in kiln per charge.
 - iv. End date of kiln drying for each charge.
 - v. 12-month rolling total.
 - b. The most recent 60 months of records shall be kept on site.
 - 2) Records of maximum dry bulb operating temperature of heated air entering the kiln, shall be recorded once per kiln charge, for each lumber drying kiln operated and shall include:
 - a. Clear identification of which individual kiln the temperature recorded is associated with.
 - b. The most recent 60 months of records shall be kept on site.

[Approval Order No. 15AQ-E608, Issued 07/21/2015, Approval Conditions 2.1, 2.2, 6.1, 6.2]

4. 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 shall 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).

Inapplicable Requirement	Requirement Description	Explanation
chapter 173-406 WAC	Acid Rain Regulations	The permittee does not operate an effected unit.
chapter 173-433 WAC	Emission Standards for Solid Fuel Burning Devices	A literal reading of WAC 173-433 and RCW 70.94.453(5) could lead to the conclusion that all solid fuel burning devices, without consideration of size, fall under the definition of this regulation/statute. The definition of solid fuel burning device is, "any device for burning wood,

40 CVP (2) G 1		coal, or any other nongaseous and non-liquid fuel, including a wood stove and a fireplace." However, this definition, when read together with the policy statement of RCW 70.94.450 clearly indicates that the concern of the Washington State Legislature was emissions from wood stoves. RCW 70.94.450 and RCW 70.94.453 are two adjacent sections in Chapter 405 of the Laws of 1987. While it might be reasonable for the policy statement of RCW 70.94.450 to lead the Legislature to regulate other solid fuel burning space heating devices similar to wood stoves, it does not seem reasonable that such a policy statement would lead to regulation of a large industrial unit such as a Hogged Fuel Boiler. Based upon this interpretation of the intention of RCW 70.94.453, WAC 173-433 was found to be inapplicable to the permittee. WAC 173-433 would be applicable if a wood stove, fireplace or similar device were present at the source.
40 CFR 63, Subpart DDDD	National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products.	This facility is not a plywood and/or composite wood products (PCWP) manufacturing facility.