

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

IN THE MATTER OF THE COMPLIANCE BY) AIR OPERATING PERMIT
BOISE CASCADE WOOD PRODUCTS, LLC) NO. **XXAQ-EXXX**
KETTLE FALLS PLYWOOD) DRAFT
Located in Kettle Falls, Washington,)
with Section 70.94.161 RCW, Operating Permits for)
Air Contaminant Sources, and the applicable rules and)
regulations of the Department of Ecology)

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

Issuance Date: _____
Effective Date: _____
Expiration Date: _____

Responsible Official: Robert Glover

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 is called the Permittee. The permittee is required to comply with the provisions contained within this permit.

This PROPOSED Air Operating Permit, DATED at Spokane, Washington, this **XXth day of Month 2020.**

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LIST OF ACRONYMS & ABBREVIATIONS

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

TAP	Toxic Air Pollutant
TPY	Tons Per Year
TSP	Total Suspended Particulate
VOC	Volatile Organic Compound
WAC	Washington Administrative Code
yr	Year

All submittals required by this permit shall be submitted to the Department of Ecology, the Environmental Protection Agency (EPA), or both as specified by the applicable requirement, at the following addresses.

Washington Department of Ecology
Air Quality Program
4601 N. Monroe Street
Spokane, WA 99205-1295

U.S. EPA Region 10, AWT-150
Part 70 Air Operating Program
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

STANDARD CONDITIONS

1. PERMIT PROVISOS

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), 9/16/2002], [WAC 173-401-640(1), 10/04/1993]

1.2 PROPERTY RIGHTS:

This permit does not convey any property rights of any sort, or any exclusive privilege. [WAC 173-401-620(2)(d), 10/4/1993].

1.3 SEVERABILITY:

If 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), 10/4/1993], [RCW 70.94.905, 1/01/18 (S)] [Order No. 09AQ-E283, Issued 2/02/2009, Approval Condition 4.7].

1.4 ENFORCEABILITY:

All terms and conditions of the permit are enforceable by the EPA and citizens unless specifically designated as state-only enforceable. [WAC 173-401-625, 10/4/1993]

1.5 GENERAL OBLIGATION:

Nothing in this permit shall alter or affect the following:

- 1.5.1 Provisions of section 303 of the FCAA (emergency orders), including the authority of EPA under that section.
- 1.5.2 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.
- 1.5.3 The applicable requirements of the acid rain program, consistent with section 408(a) of the FCAA.
- 1.5.4 The ability of EPA to obtain information from a source pursuant to Section 114 of the FCAA.

1.5.5 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), 10/04/1993]

1.6 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), 10/4/1993]

1.7 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 renewal 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 renewal application has been submitted. [WAC 173-401-620(2)(j), 10/4/1993]

1.8 PERMIT APPEALS:

This permit or any conditions in it may be appealed only by filing an appeal with the Pollution Control Hearings Board, PO Box 40903, Olympia, WA 98504-0903 and serving it on the Department of Ecology, Appeals Coordinator, PO Box 47608, Olympia, WA 98504-7608. Send a copy of the appeal to the Department of Ecology, Air Quality Program, 4601 North Monroe Street, Spokane, WA 99205-1295 within 30 days of receipt of this permit, pursuant to RCW 43.21B.310. This provision for appeal in this section is separate from and additional to any federal rights to petition and review under § 505(b) of the FCAA. [WAC 173-401-620(2)(i), 10/4/1993]

1.9 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), 10/4/1993]

1.10 REASONABLY AVAILABLE CONTROL TECHNOLOGY

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 purpose of permit issuance or renewal. This does not preclude RACT determinations under Section 8, Chapter 252, Laws of 1993, which shall be incorporated into an operating permit as provided in WAC 173-401-730. [WAC 173-401-605(3)(1), 10/4/1993; RCW 70.94.154, 2018 (S)]

2. PERMIT ADMINISTRATION

2.1 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), 10/4/1993], [Order No. 19AQ-E058, Issued 08/30/2019, Approval Condition 10.E] [Order No 09AQ-E283, Issued 2/02/2009, Approval Conditions 4.4, 4.5. 4.6], [PSD-X80-01 First Amendment, Issued 02/14/03, Approval Condition 5], [Order No. 15AQ-E631, Issued 11/30/2015, Approval Condition 2.10], [Order No. 07AQ-E243, 2nd Amendment, Issued 12/13/2011, Approval Conditions 7.5 & 7.6].

2.2 COMPLIANCE SCHEDULES:

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),(B) 2/3/2016].

2.3 PERMIT RENEWAL AND EXPIRATION:

This permit is issued for a fixed term of five years. The permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application (as outlined in WAC 173-401-510) is submitted at least 12 months, but no greater than 18 months prior to the date of permit expiration. A complete renewal application is due no later than **(ONE YEAR BEFORE RENEWAL)**. Upon receipt of a timely and complete application for renewal, this source may continue to operate until Ecology takes final action on the permit application. This protection 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, 10/4/1993; 173-401-705, 10/04/1993; 173-401-710, 9/16/2002]

2.4 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), 10/4/1993], [WAC 173-400-105(7), (8), 10/25/18 (S)]

2.5 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), 9/16/2002]

2.6 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 operating

permit if the permit fees are not paid, per WAC 173-401-930(3). [WAC 173-401-620(2)(f), 930(3), 10/4/1993], [WAC 173-401-930(3), 12/30/1993] [Order No. 07AQE- 243, 1st Amendment, Issued 10/30/2009, Approval Condition 7.6].

2.7 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:

- 2.7.1 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.
- 2.7.2 Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- 2.7.3 Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
- 2.7.4 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.
 - 2.7.4.1 Ecology may require the permittee to conduct stack testing and/or ambient air monitoring and report the results to Ecology.
 - 2.7.4.2 Ecology may conduct or require that a test be conducted using approved methods from 40 CFR parts 51, 60, 61 and 63 (in effect on February 20, 2001), or the *Ecology Source Test Manual September 20, 2004*. 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.
- 2.7.5 No person shall obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties.
- 2.7.6 Nothing in this condition shall limit the ability of Ecology or the EPA to inspect or enter the premises of the permittee under Section 114 or other provisions of the FCAA.

WAC 173-401-630(2), 02/03/2016], [WAC 173-400-105(2),(3), (4), 10/25/18(S)], [RCW 70.94.200, 2018 (S)], [Order No. 19AQ-E058, Issued 08/30/2019, Approval Condition 10.C.], [Order No. 09AQ-E283, issued 2/02/2009, Approval Condition 4.1], [PSD-X80-01 First Amendment, Issued 02/14/03, Approval Condition 6b], [Order No. 07AQ-E243, 2nd Amendment, Issued 12/13/2011, Approval Conditions 2.3 & 7.2].

2.8 OPERATIONAL FLEXIBILITY:

The RTCO may be operated in thermal mode (without catalyst) or in catalytic mode. The applicable requirements in conditions 5.6.7, 5.10.1.2 and 5.10.1.3 apply when the RTCO is operating thermally. The applicable requirements in conditions 5.6.6, 5.10.1.4 and 5.10.1.5 apply when the RTCO is operating catalytically.

The permittee shall, contemporaneously with making a change from one operating mode to another, record in a log a record of the scenario under which it is operating.
[WAC 173-401-650, 10/04/1993]

2.9 RECORDKEEPING:

- 2.9.1 The permittee shall keep records of required monitoring information and support data for a period of five years from the date of collection. Records shall include, where applicable, the following:
- 2.9.1.1 The date, place, and time of the sampling or measurements.
 - 2.9.1.2 The date(s) analyses were performed.
 - 2.9.1.3 The company or entity that performed the analysis.
 - 2.9.1.4. The analytical techniques or methods used.
 - 2.9.1.5. The results of such analyses.
 - 2.9.1.6. The operating conditions as existing at the time of sampling or measurement.
- [WAC 173-401-615(2)(a), (c), 9/16/2002]

2.10 REPORTING:

- 2.10.1. **Deviation Reports**¹ The permittee shall report deviations from permit conditions, including those attributable to upset conditions as defined in this permit, and include the following information: the time the deviation occurred, duration of the deviation, magnitude of the deviation in relation to the applicable limit, probable cause of the deviation, and any corrective actions or preventive measures taken. Such deviations shall be reported to Ecology at the address included in this permit.
- 2.10.1.1 Deviations which represent a potential threat to human health or safety must be reported as soon as possible, but in no case later than 12 hours after the deviation is discovered.
 - 2.10.1.2 Excess emissions due to emergency (§2.11.1) or which the source believes unavoidable (§2.11.2), and does not meet the criteria in 2.10.1.1, shall be reported within two working days of the event.
 - 2.10.1.3 Other deviations shall be reported no later than 30 days after the end of the month in 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. The source shall maintain a contemporaneous record of all deviations.

Each deviation report shall contain certification of truth, accuracy, and completeness by a responsible official in accordance with section 2.10.5.

[WAC 173-401-615(3)(b), 9/16/2002], [WAC 173-400-107, 6/2/1995, 8/16/2018 (S)], [40 CFR 60.49b(h), 7/1/2017], [WAC 173-401-630(1), 02/03/2016], [PSD-X80-01 First Amendment, Issued 02/14/03, Approval Condition 3], [Order No. 15AQ-E631, Issued

¹ See Attachment 1 of the SOB for definition of “deviation”.

11/30/2015, Approval Condition 2.6, 2.8], [Order No. 07AQ-E243, 2nd Amendment, Issued 12/13/2011, Approval Conditions 6.1, 6.2].

- 2.10.2 **Semi-Annual Monitoring Reports:** The permittee shall submit reports of any required monitoring (i.e., Monitoring Recordkeeping and Reporting identified in section 6) at least once every six months. Monitoring periods shall be January 1st — June 30th, and July 1st —December 31st. Semi-annual monitoring reports shall be due no later than 45 days following the end of each six-month period. All instances of deviations from permit requirements must be clearly identified in such reports. Failure to conduct any required monitoring must be reported as a deviation. The report must include identification of all months during which no deviations occurred. All required reports must be certified by a responsible official consistent with Condition 2.10.5. [WAC 173-401-615(3)(a), 9/16/2002]
- 2.10.3 **Compliance Certifications:** The permittee shall submit a certification of compliance with permit terms and conditions at least once per calendar year. All certifications shall be submitted no later than 45 days following the end of the certification period. Upon issuance of this final permit, a final compliance certification shall be submitted under the original AOP for the period of time between the latest certification submitted and the renewal permit effective date. The first certification submitted under this renewal AOP shall cover the period of time between the renewal permit effective date and the end of that calendar year. Ecology may require that compliance certifications be submitted more frequently for those emission units not in compliance with permit terms and conditions, or where more frequent certification is specified in the applicable requirement. [WAC 173-401-630(5)(a), 02/03/2016], [WAC 173-401-630(1), 02/03/2016]
- 2.10.3.1. The certification shall describe and include the following:
- 2.10.3.1.1. The permit term or condition that is the basis of the certification.
 - 2.10.3.1.2. The current compliance status.
 - 2.10.3.1.3. Whether compliance was continuous or intermittent.
 - 2.10.3.1.4. The methods used for determining compliance, currently and over the reporting period consistent with WAC 173-401-615(3)(a).
 - 2.10.3.1.5. All compliance certifications shall be submitted to Ecology and EPA Region 10 at the addresses included in this permit.
- [WAC 173-401-630(5)(d), 02/03/2016]
- 2.10.3.2. Where the permit does not require testing, monitoring, recordkeeping, and reporting for insignificant emissions units or activities, the permittee may certify continuous compliance if there were no observed, documented, or known instances of noncompliance during the reporting period. [WAC 173-401-530(2)(d), 9/16/2002]
- 2.10.3.3. All compliance certifications shall include certification by a responsible official in accordance with Condition 2.10.5.
- 2.10.3.4. 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)]

2.10.4. **Emission Inventory:** The permittee shall submit an inventory of actual emissions from the source for each calendar year. The inventory shall include stack and fugitive emissions of TSP, PM₁₀, PM_{2.5}, SO_x, CO, NO_x, total reduced sulfur compounds (TRS), fluorides, lead, VOCs, ammonia, and other contaminants, and shall be submitted no later than April 15th of the following year. The source 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 on the most recent published EPA emission factors for a source category, or other information available to the owner and operator, whichever is the better estimate. Emissions inventories shall be sent to Ecology at the address included in this permit. Ecology may specify a different format in accordance with WAC 173-400-105(1), such as electronic submittal(s).

[WAC 173-400-105(1), 10/06/2018, 10/25/2018 (S)]

2.10.5. **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, 10/4/1993], [WAC 173-401-500(6), 9/16/2002], [40 CFR 60.4(a), (b), 07/01/02]

2.11 EXCESS EMISSIONS:

2.11.1 **Excess emissions due to emergency:** An emergency², as defined in WAC 173-401-645(1), constitutes an affirmative defense to an action brought for non-compliance with a technology-based³ emission limitation if the permittee demonstrates through properly signed, contemporaneous operating logs or other relevant evidence that:

- 2.11.1.1. An emergency occurred and that the permittee can identify the cause(s) of the emergency.
- 2.11.1.2. The permitted facility was at the time being properly operated.

2 An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, which requires immediate corrective action to restore normal operation. An emergency does not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

3 Technology-based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes.

-
- 2.11.1.3. 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 the permit.
 - 2.11.1.4. The permittee submitted a notice of the emergency to Ecology within **two working days** of the time when emission limitations were exceeded due to the emergency, or shorter periods of time specified in an applicable requirement. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
 - 2.11.1.5. In any enforcement action, the permittee seeking to establish the occurrence of an emergency has the burden of proof. [WAC 173-401-645, 9/16/02, 10/04/1993 (S)]

2.11.2 Unavoidable Excess Emissions:

- 2.11.2.1 WAC 173-400-107: WAC 173-400-107 is in effect until 173-400-108 and 173-400-109 become effective.
 - 2.11.2.1.1. 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 2.11.2.2, 2.11.2.3 or 2.11.2.4.
 - 2.11.2.1.2. Excess emissions due to startup or shutdown conditions shall be considered unavoidable provided the source reports as required under Condition 2.10.1 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.
 - 2.11.2.1.3. Excess emissions due to scheduled maintenance shall be considered unavoidable if the source reports as required under Condition 2.10.1 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.
 - 2.11.2.1.4. Excess emissions due to upsets shall be considered unavoidable provided the source reports as required under Condition 2.10.1, and adequately demonstrates that:
 - 2.11.2.1.4.1. The event was not caused by poor or inadequate design, operation, or maintenance.
 - 2.11.2.1.4.2. 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(3), 10/06/2018, 8/16/2018 (S)], [WAC 173-400-107, 10/06/2018, 8/16/2018 (S)]

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- 2.11.2.2. WAC 173-400-108 – (State-only requirement not federally enforceable) This section will be in effect as outlined in 2.11.2.1 above.
- 2.11.2.2.1. Notify the permitting authority.
- 2.11.2.2.1.1. When excess emissions represent a potential threat to human health or safety, the owner or operator must notify the permitting authority by phone or electronic means as soon as possible, but not later than **12 hours** after the excess emissions were discovered.
- 2.11.2.2.1.2. For all other excess emissions, the owner or operator must notify the permitting authority in a report as provided in 2.11.2.2.2.
- 2.11.2.2.2. Report – The owner or operator must report all excess emissions to the permitting authority.
- 2.11.2.2.2.1. To claim emissions as unavoidable under WAC 173-400-109, the report must contain the information in 2.11.2.2.4.
- 2.11.2.2.2.2. Chapter 173-401 WAC source: As provided in WAC 173-401-615(3) and 2.11.2.2.4. Section 2.11.2.2.3. of this section does not apply to a Chapter 401 source reporting under WAC 173-401-615.
- 2.11.2.2.3. The report must contain at least the following information:
- 2.11.2.2.3.1. Date, time, duration of the episode.
- 2.11.2.2.3.2. Known causes.
- 2.11.2.2.3.3. For exceedances of an emission limitation other than opacity, an estimate of the quantity of excess emissions.
- 2.11.2.2.3.4. The corrective actions taken.
- 2.11.2.2.3.5. The preventative measures taken or planned to minimize the chance of recurrence.
- 2.11.2.2.4. For an excess emission event that the owner or operator claims was unavoidable under WAC 173-400-109, the report must also include the following information:
- 2.11.2.2.4.1. Properly signed contemporaneous records or other relevant evidence documenting the owner or operator’s actions in response to the excess emissions event.
- 2.11.2.2.4.2. Information on whether installed emission monitoring and pollution control systems were operating at the time of the exceedance. If either or both systems were not operating, information on the cause and duration of the outage.
- 2.11.2.2.4.3. All additional information required under WAC 173-400-109(5) supporting the claim that the excess emissions were unavoidable. [WAC 173-400-108, 8/16/2018 (S only)].
- 2.11.2.3. WAC 173-400-109. (State-only requirement not federally enforceable) This section will be in effect as outlined in 2.11.2.1 above.

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- 2.11.2.3.1. Excess emissions determined to be unavoidable under the procedures and criteria in this section are violations of the applicable statute, rule, permit, or regulatory order.
 - 2.11.2.3.1.1. The permitting authority determines whether excess emissions are unavoidable based on the information supplied by the source and the criteria in 2.11.2.3.5.
 - 2.11.2.3.1.2. Excess emissions determined by the permitting authority to be unavoidable are:
 - 2.11.2.3.1.2.1. A violation subject to WAC 173-400-230 (3), (4) and (6).
 - 2.11.2.3.1.2.2. Not
 - 2.11.2.3.2. The owner or operator of a source shall have the burden of proving to the permitting authority in an enforcement action that excess emissions were unavoidable. This demonstration shall be a condition to obtaining relief under 2.11.2.3.5.
 - 2.11.2.3.3. This section does not apply to an exceedance of an emission standard in 40 CFR Parts 60, 61, 62, 63, and 72, or a permitting authority's adoption by reference of these federal standards.
 - 2.11.2.3.4. Excess emissions that occur due to an upset or malfunction during a startup or shutdown event are treated as an upset or malfunction under 2.11.2.3.5.
 - 2.11.2.3.5. Excess emissions due to an upset or malfunction will be considered unavoidable provided the source reports as required by WAC 173-400-108 and adequately demonstrates to the permitting authority that:
 - 2.11.2.3.5.1. The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition.
 - 2.11.2.3.5.2. The event was not of a recurring pattern indicative of inadequate design, operation or maintenance.
 - 2.11.2.3.5.3. When the operator knew or should have known that an emission standard or other permit condition was being exceeded, the operator took immediate and appropriate corrective action in a manner consistent with safety and good air pollution control practice for minimizing emissions during the event, taking in to account the total emissions impact of the corrective action. Actions taken could include slowing or shutting down the emission unit as necessary to minimize emissions.
 - 2.11.2.3.5.4. If the emitting equipment could not be shutdown during the malfunction or upset to prevent the loss of life, prevent personal injury or severe property damage, or to minimize overall emissions, repairs were made in an expeditious fashion.
 - 2.11.2.3.5.5. All emission monitoring systems and pollution control systems were kept operating to the extent possible unless their shutdown was

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

- 2.11.2.3.5.6. The amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent possible.
- 2.11.2.3.5.7. All practicable steps were taken to minimize the impact of the excess emissions on ambient air quality. [WAC 173-400-109, 08/18/2018 (S only)].

2.12 FEDERAL CHLOROFLUOROCARBON (CFC) REQUIREMENTS – TITLE VI OF THE FCAA.

- 2.12.1. 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.
 - 2.12.1.1. Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156.
 - 2.12.1.2. 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.
 - 2.12.1.3. Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
 - 2.12.1.4. 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.)
 - 2.12.1.5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156.
 - 2.12.1.6. 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.
 - 2.12.1.7. Persons conducting maintenance, service, repair, or disposal of appliances must follow the prohibitions pursuant to 40 CFR 82.154.
 - 2.12.1.8. 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.
- 2.12.2. 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.
- 2.12.3. If the permittee performs a service on motor (fleet) vehicles and when this service involves ozone depleting substance refrigerant in the MVAC, the permittee is subject to all applicable requirements as specified in 40 CFR 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.

- 2.12.4. 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, 07/01/02], [RCW 70.94.970, 1/4/01 (S)], [RCW 70.94.980, 1/4/01 (S)]

2.13 INSIGNIFICANT EMISSION UNITS

- 2.13.1. Upon request from Ecology the permittee must provide documentation sufficient to enable Ecology to determine that the emission unit or activity has been appropriately listed as insignificant.
- 2.13.2. An activity or emissions unit that qualifies as insignificant solely on the basis of WAC 173-401-530 (1)(a) of shall not exceed the emissions thresholds specified in WAC 173-401-530(4) until the permit is modified pursuant to WAC 173-401-725 (Permit modifications)
- 2.13.3. Testing, monitoring, recordkeeping and reporting are not required for insignificant emissions units and activities unless determined by the permitting authority to be necessary to assure compliance, or unless it is otherwise required by a generally applicable requirement of the state implementation plan. [WAC 173-401-530(2)(c), 9/16/2002]
- 2.13.4. Upon request from the permitting authority, at any time during the term of the permit, an applicant who lists an activity or emissions unit as insignificant under WAC 173-401-530 (1)(a) shall demonstrate to the permitting authority that the actual emissions of the unit or activity are below the emission thresholds. [WAC 173-401-530(2), (4), (5),(6), 9/16/2002]

3. PERMIT CHANGES

3.1 CHANGES NOT REQUIRING PERMIT REVISIONS:

- 3.1.1. *Section 502(b)(10) changes.* The permittee is authorized to make section 502(b)(10) changes, as defined in WAC 173-401-200(30), without a permit revision, providing the conditions included below are met. The permit shield as described in Condition 1.1 shall not apply to any change made pursuant to this paragraph.
- 3.1.1.1. The proposed changes are not Title I (FCAA) modifications.
- 3.1.1.2. 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.
- 3.1.1.3. The proposed changes do not alter permit terms that are necessary to enforce limitation on emissions from units covered by the permit.
- 3.1.1.4. 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.
- 3.1.1.5. 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.

- 3.1.2. *Changes related to Emissions trading under an emissions cap.* Pursuant to Condition 3.1.1, 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:
- 3.1.2.1. The written notification required under Condition 3.1.1.4 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.)
- 3.1.2.2. 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.
- 3.1.2.3. 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.
- 3.1.2.4. A source making a change under this section shall comply with applicable preconstruction review requirements established pursuant to Condition 4.1.
- 3.1.2.5. 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, 9/16/2002], [WAC 173-401-620(2)(g), 10/4/1993]

3.2 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:

- 3.2.1. The proposed changes shall not weaken the enforceability of any existing permit conditions.
- 3.2.2. Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition.
- 3.2.3. 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.
- 3.2.4. The change shall not qualify for the permit shield under Condition 1.1.
- 3.2.5. 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.
- 3.2.6. A source making a change under this section shall comply with the preconstruction review requirements established pursuant to Conditions 4.1 and 4.2.

[WAC 173-401-724, 02/03/2016]

3.3 REOPENING FOR CAUSE:

- 3.3.1. Ecology will reopen and revise this permit as necessary to remedy deficiencies in the following circumstances:
 - 3.3.1.1. Additional requirements under the FCAA become applicable to a major source three or more years prior to the expiration date of this permit. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j).
 - 3.3.1.2. 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.
 - 3.3.1.3. Ecology or the Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- 3.3.2. 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.

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- 3.3.3. 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.
 - 3.3.4. All permit conditions remain in effect until such time as Ecology takes final action.[WAC 173-401-730, 10/04/1993]

3.4 ADMINISTRATIVE PERMIT AMENDMENTS:

- 3.4.1. An administrative permit amendment is a permit revision that:
 - 3.4.1.1. 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.
 - 3.4.1.2. Corrects typographical errors within the permit.
 - 3.4.1.3. 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.
 - 3.4.1.4. Requires more frequent monitoring or reporting by the permittee.
 - 3.4.1.5. 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.
- 3.4.2. The source may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.
- 3.4.3. Ecology shall take no more than sixty days from receipt of a request for an administrative permit amendment to take final action on such request, and may incorporate such changes without providing notice to the public or affected states provided that it designates any such permit revisions as having been made pursuant to WAC 173-401-720(3)(a)
- 3.4.4. 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, 08/16/18]

4. APPLICABLE WHEN TRIGGERED REQUIREMENTS

The following requirements apply if the permittee takes certain actions or proposes changes that trigger applicability. No monitoring is specified for these requirements, but the Compliance Certification specified in Section 2.10.3 must include a description of the permittee's compliance status.

4.1. 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 173-400-141, or WAC 173-460 before the permittee obtains written final approval from Ecology in accordance with those regulations, pays the appropriate fees required by WAC 173-455-120, and pays the cost of public notice described in WAC 173-400-171.

[WAC 173-400-110, 9/29/2016, 11/28/2012 (S)], [WAC 173-400-113, 4/29/2015, 11/28/2012 (S)], [WAC 173-455-120, 11/30/2012 (S)], [WAC 173-400-171, 10/06/2018, 8/16/2018 (S)], [WAC 173-460, 05/20/2009 (S)], [RCW 70.94.152, 1/4/01 (S)], [Order No. 09AQ-E283, issued 2/02/2009, Approval Condition 4.3]

4.2. RECONSTRUCTION OF AN AFFECTED SOURCE:

The permittee shall not reconstruct the affected source (as defined in 40 CFR 63.2232(b)) without following the procedures in 40 CFR 63.5((d) & (e) and 40 CFR 63.9(b) (4) and (5). [40 CFR 63.5(b), 4/5/2002]

4.3 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 according to that regulation. The permittee shall pay the appropriate fees required by WAC 173-455-100 prior to commencing construction. [WAC 173-455-100, 10/25/2018 (S)], [WAC 173-400-114, 11/28/2012 (S)], [RCW 70.94.153, 1/4/01 (S)]

4.4 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 notification, 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, 07/01/17], [WAC 173-400-075(1), 5/31/2016 (S)]

4.5 SOURCE TESTING:

The following notification and reporting conditions apply to all required source testing.

- 4.5.1. Notification: The permittee shall provide at least 30 days notice prior to any performance test. The notice shall include a source test plan for approval. If Ecology does not provide comments on the plan within three weeks, the plan shall be considered acceptable. If there is a delay in conducting a scheduled performance test, the permittee shall notify Ecology as soon as possible. The notification shall include at least:
 - 4.5.1.1. A test schedule.
 - 4.5.1.2. Proposed test methods, including a request to deviate from any required test method.
 - 4.5.1.3. Operating conditions (production rates, equipment operating rates, etc.) during the test. Ecology may require specific operating conditions to be met.

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- 4.5.1.4. Any adjustments that will be made prior to the stack test, such as tuning burners or changing bags in a baghouse. Normally scheduled periodic maintenance need not be included.
- 4.5.2. Source test Methods: Source testing shall be conducted using EPA methods from 40 CFR Parts 51, 60, 61 and 63 (in effect on October 1, 2006).
Changes to the test methods specified in the Applicable Requirements must be approved in advance by Ecology. Requests for changes must be submitted in writing at least 30 days prior to the performance test.
- 4.5.3. Test reports. The permittee shall submit source test reports to Ecology within 60 days of test completion. Test reports shall include:
- 4.5.3.1. The date and time of the test.
 - 4.5.3.2. A description of the source, associated pollution control equipment and sampling locations.
 - 4.5.3.3. A description of the test methods and quality assurance procedures used.
 - 4.5.3.4. A summary of results in the same units and averaging periods as the applicable emission standard.
 - 4.5.3.5. Field data and sample calculations.
 - 4.5.3.6. Operating data such as the amount of fuel burned, raw materials processed or product produced during the test.
 - 4.5.3.7. Source and control equipment operating parameters measured during the test.

4.6 CHEMICAL ACCIDENT PREVENTION PROVISIONS:

An owner or operator that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR §68.115, shall comply with the requirements of 40 CFR Part 68 no later than the latest of the following dates:

- 4.6.1. Three years after the date on which regulated substance present above a threshold quantity is first listed under 40 CFR §68.130, or;
- 4.6.2. The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 63.10 (d)(2)], [40 CFR Part 68, (1988)], [WAC 173-401-630(1), 9/16/02, 02/03/2016 (S)], [Order No. 07AQE- 243, 1st Amendment, Issued 10/30/2009, Approval Conditions 2.2, 2.3 & 2.4].

5 EMISSION LIMITATIONS AND WORK PRACTICE REQUIREMENTS

Pursuant to Washington Administrative Code (WAC) 173-401 the permittee is authorized to operate the Kettle Falls, Washington plywood facility in accordance with the terms and conditions listed in this permit. These processes are subject to the conditions included in Sections 5.1 through 5.7; to the Monitoring, Recordkeeping, and Reporting Requirements in Section 6, and to other terms and conditions specified in this permit⁴.

⁴ The monitoring, recordkeeping and reporting requirements in Section 6 do not apply to insignificant emissions units or activities.

The column entitled **Description** in each table contains abbreviated and/or paraphrased versions of the applicable conditions, emission limitations or work practices. The cited condition, emission standard or work practice is the enforceable requirement. Any perceived discrepancies between the description and an underlying applicable requirement will be resolved by reference to the cited applicable requirement.

Testing Requirements

Although there are conditions with no on-going testing requirements, Ecology retains the authority to conduct or require that testing be conducted 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), 9/16/2002], [WAC 173-401-630(1), 02/03/2016], [WAC 173-400-105(4), 10/06/2018, 10/25/2018(S)]

Streamlining

An asterisk following a condition number indicates that streamlining of a less stringent requirement has taken place and is listed in the Statement of Basis.

5.1 FACILITY WIDE:

This section is applicable and enforceable with respect to all emission units source wide, including those emission units in Sections 5.2 through 5.8. Monitoring, recordkeeping and reporting requirements in this section do not apply to insignificant emission units.

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.1.1	WAC 173-400-040(2), (10/6/2016) WAC173-400-040(2), (8/16/2018)	F S	Visible emissions shall not exceed 20% opacity for more than 3 minutes in any one hour. Exceptions to this standard can be found in WAC 173-400-040. Certain exceptions will change as 173-400-107 is no longer effective and 173-400-108 & -109 take effect.	RM 9	2M
5.1.2	WAC 173-400-060 (10/6/2016) WAC 173-400-060 (10/25/2018)	F S	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	4M
5.1.3	WAC 173-400-040(3) 8/16/2018	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.		1M
5.1.4	WAC 173-400-040(4)(a), (10/6/2016) WAC 173-400-040(4)(a), 8/16/2018	F S	The permittee shall perform maintenance to minimize emissions and take reasonable precautions to prevent the release of air contaminants.		3M
5.1.5	WAC 173-400-040(9), (8)(a) (8/16/2018)	S	The permittee shall take reasonable precautions to prevent fugitive dust. Maintain & operate to minimize emissions.		3M
5.1.6	WAC 173-400-040(5), 8/16/2018	S	Any producer of an odor, which may unreasonably interfere with any other property owner's use and enjoyment of his property, must reduce these odors to a reasonable minimum.		1M
5.1.7	WAC 173-400-040(6), (10/06/2018)	F	No person shall cause or permit the emission of any air contaminant if it is detrimental to the health, safety, or		1M

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
	WAC 173-400-040(6), (8/16/2018)	S	welfare of any person, or causes damage to property or business.		
5.1.8	WAC 173-400-040(8), (10/06/2018) WAC 173-400-040(8),8/16/2018	F S	No person shall conceal or mask an emission of an air contaminant.		None
5.1.9	WAC 173-400-200(2), (10/3/2014) WAC 173-400-200(2), 1/10/2005	F S	No source may use dispersion techniques or excess stack height to meet ambient air quality standards or PSD increment limitations.		None
5.1.10	WAC 173-400-205 (6/2/1995) WAC 173-400-205 (2/19/1991)	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.		None
5.1.11	RCW 70.94.040 (1/4/01)	S	Causing air pollution in violation of Chapter 70.94 RCW is unlawful.		None
5.1.12	Order No. 09AQ-E283, issued 2/02/2009, Approval Condition 4.8 WAC 173-425, Restriction on Open Burning (3/13/00)	F	No outdoor burning, except as allowed by WAC 173-425.		None
5.1.13	WAC 173-400-040(1)(c), (10/06/2018)	F	All emissions units are required to use RACT.		None
5.1.14	WAC 173-400-040(7), 10/06/2018 WAC 173-400-040(7), 8/16/2018	F S	No person shall cause or allow the emission of a gas containing sulfur dioxide from any emissions unit in excess of one thousand ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based on the average of any period of sixty consecutive minutes.	RM6	5M

5.2 CYCLONE (C-2) AND BAGHOUSES (BH-1, BH-2):

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.2.1	Order 19AQ-E058, Issued 08/30/2019, Approval Condition 2.A.	F	Total annual plywood production shall not exceed 280,000,000 square feet of 3/8" plywood.		6M
5.2.2	Order 19AQ-E058, Issued 08/30/2019, Approval Condition 3.A.	F	Opacity from the cyclone exhaust shall be less than 10 percent over a six minute interval.	RM 9	2M
5.2.3	Order 19AQ-E058, Issued 08/30/2019, Approval Condition 3.B.	F	Opacity from the baghouse exhaust shall be less than percent over a six minute interval.	RM9	2M
5.2.4	Order 19AQ-E058, Issued 08/30/2019, Approval Condition 3.C.	F	PM emissions from the baghouse exhaust shall not exceed 0.005 gr/dscf.	RM 5 / RM 202	4M
5.2.5	Order 19AQ-E058, Issued 08/30/2019, Approval Condition 3.D.	F	Mass emission rate of PM10 shall not exceed 1.5 pounds per hour in the exhaust of fabric filter BH-1	RM 5 / RM 202	4M
5.2.6	Order 19AQ-E058, Issued 08/30/2019, Approval Condition 3.E.	F	Mass emission rate of PM10 shall not exceed 1.6 pounds per hour in the exhaust of fabric filter BH-2	RM 5 / RM 202	4M
5.2.7	Order 19AQ-E058, Issued 08/30/2019, Approval Condition 5.	F	O&M manual shall be reviewed annually and updated to reflect any modifications of the plant or operating procedures.		7M
5.2.8	Order 19AQ-E058, Issued 08/30/2019, Approval Condition 6.A.	F	The fabric filters (BH-1, BH-2) shall be equipped with magnehelic pressure differential gauges to indicate pressure drop across the filters (or other manufacturer's recommended filter failure monitoring equipment). Indications of filter failure (the gauges) shall be in a place readily accessible to equipment operators (e.g. at the unit or a control room).		None

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.2.9	Order 19AQ-E058, Issued 08/30/2019, Approval Condition 9.A.	F	The cyclones and fabric filters material catch systems shall be routed through rotary air locks to a blow tube, which then can be directed to either the truck bins or the boiler fuel silo. There shall be no visible emissions from the cyclone or fabric filter catch systems.		None
5.2.10	Order 19AQ-E058, Issued 08/30/2019, Approval Condition 10.A.	F	No visible emissions shall be allowed beyond the property line.	RM 22	4M
5.2.11	Order 19AQ-E058, Issued 08/30/2019, Approval Condition 10.B.	F	Order void if operation is discontinued for eighteen (18) months.		None
5.2.12	Order 19AQ-E058, Issued 08/30/2019, Approval Condition 10.D.	F	Legible copies of Order 19AQ-E058 and the O&M manual shall available to employees in direct operation of the facility, and be available for review upon request by Ecology.		None
5.2.13	Order 19AQ-E058, Issued 08/30/2019, Approval Condition 10.E.	F	All equipment must be operated in accordance with the information contained within the NOC application, O&M manual and manufacturer's instructions unless otherwise approved in writing by Ecology.		3M

5.3 VENEER DRYERS #2 & #3:

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.3.1	Order No. 09AQ-E283, issued 2/02/2009, Approval Condition 1.1	F	No visible emissions shall be allowed beyond the property line.	RM 22	4M
5.3.2	Order No. 09AQ-E283, issued 2/02/2009, Approval Condition 2.1	F	Total facility production shall not exceed 280 million square feet (3/8" equivalent) plywood per year.		8M
5.3.3	Order No. 09AQ-E283, issued 2/02/2009, Approval Condition 2.3	F	Exceeding production cap may require a notice of construction. Any modification of plant or operating procedures shall be reported to Ecology.		None
5.3.4	Order No. 09AQ-E283, issued 2/02/2009, Approval Condition 2.4	F	No leaks or losses of PM, dryer combustion gases & organic compounds during normal steady state operations.		25M
5.3.5	Order No. 09AQ-E283, issued 2/02/2009, Approval Condition 3,	F	Site specific O&M manuals for all equipment with potential to affect emissions shall be maintained and followed. Manuals shall be updated to reflect modifications of plant or operating procedures.		9M
5.3.6	Order No. 09AQ-E283, issued 2/02/2009, Approval Condition 4.2	F	Legible copies of the approval order and the O&M manual shall be in the working vicinity and available to the employees in direct operation of the dryers and emission control systems.		None
5.3.7	Order No. 09AQ-E283, issued 2/02/2009, Approval Condition 4.3	F	The facility shall be constructed according to the information and specifications submitted as part of the NOC application. The facility shall be operated in accordance with manufacturer's instructions and the O&M manual, unless otherwise approved in writing by Ecology.		3M

5.4 FLUID BED COMBUSTOR:

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.4.1	Order No. 07AQ-E243, 2 nd Amendment, Issued 12/13/2011, Approval Condition 3.6	S	Opacity from the control device stack shall not exceed 10% for more than 6 minutes in any hour.	RM 9	2M
5.4.2*	Order PSD-X80-01, First Amendment, Issued 02/14/03, Approval Condition 1	F	Emissions of particulate matter from the FBC stack shall not exceed 0.04 gr/dscf.	RM 5	11M, 12M
5.4.3	Order No. 07AQ-E243, 2 nd Amendment, Issued 12/13/2011, Approval Condition 3.4	S	Emissions of filterable particulate matter from the ESP/RTCO stack \leq 4.0 lb/hr (3-hour average).	RM5	11M, 12M
5.4.4	Order PSD-X80-01, First Amendment, Issued 02/14/03, Approval Condition 1	F	Annual emissions of particulate matter from the FBC/veneer dryer shall not exceed 186 tons.	RM 5	11M
5.4.5	Order No. 07AQ-E243, 2 nd Amendment, Issued 12/13/2011, Approval Condition 3.1	S	NOx emissions \leq 123 tons in any 12 consecutive months.	RM7 or 7A	11M
5.4.6	Order No. 07AQ-E243, 2 nd Amendment, Issued 12/13/2011, Approval Condition 3.2.1	S	In catalytic mode, CO emissions at the RTCO outlet shall not exceed 10% by mass of CO measured at the inlet.	RM10	11M
5.4.7	Order No. 07AQ-E243, 2 nd Amendment, Issued 12/13/2011, Approval Condition 3.2.2	S	In thermal mode, the CO emission limit shall be based on the average of three runs from the initial stack test on the RTCO stack. The CO emissions limit will be based on operation of the RTCO at the temperature at which 90% VOC destruction is achieved.	RM10	11M
5.4.8	Order No. 07AQ-E243, 2 nd Amendment, Issued 12/13/2011, Approval Condition 3.3	S	VOC emissions \leq 2.83 lb/hr (3-hour average).	RM25A	11M

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.4.9	Order No. 07AQ-E243, 2 nd Amendment, Issued 12/13/2011, Approval Condition 3.3.1	S	VOC emissions at the RTCO outlet shall not exceed 10% by mass of the VOC emissions at the RTCO inlet.	RM25A	11M
5.4.10	Order No. 07AQ-E243, 2 nd Amendment, Issued 12/13/2011, Approval Condition 3.5	S	SO2 emissions ≤8,480 lb in any 12 consecutive months.	RM6	5M, 11M
5.4.11	Order No. 07AQ-E243, 2 nd Amendment, Issued 12/13/2011, Approval Condition 1.2	S	Natural gas shall be the only fuel used by the RTCO and ESP preheater.		none
5.4.12	Order No. 07AQ-E243, 2 nd Amendment, Issued 12/13/2011, Approval Condition 1.5	S	RTCO shall not be operated at temperature >1900°F (3-hour average) at any time.		20M, 21M
5.4.13	Order No. 07AQ-E243, 2 nd Amendment, Issued 12/13/2011, Approval Condition 4.1	S	Prepare and update RTCO, ESP and ESP preheater O&M Manuals.		10M
5.4.14	40 CFR 64.7(b)	F	The permittee shall maintain the monitoring equipment specified in MRRR 11M, including but not limited to, maintaining necessary parts for routine repairs of the equipment.		12M
5.4.15	Order PSD-X80-01 First Amendment Issued 02/14/03 Approval Condition 5	F	All equipment must be operated in accordance with the information contained within the PSD application.		3M
5.4.16	Order No. 07AQ-E243, 2 nd Amendment, Issued 12/13/2011, Approval Condition 7.3	S	Copy of Order available to employees, and to Ecology upon request.		none
5.4.17	Order No. 07AQ-E243, 2 nd Amendment, Issued	S	Opacity from the abort stack shall not exceed 10% (3-minute average) as determined by EPA Method 9	RM 9	2M

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
	12/13/2011, Approval Condition 3.7		whenever the ESP preheater is in use. Opacity readings shall be conducted whenever visible emissions are observed.		
5.4.18	Order No. 07AQ-E243, 2 nd Amendment, Issued 12/13/2011, Approval Condition 3.8	S	Emissions from the abort stack shall not exceed 0.1 grains/dscf.	RM 5	2M

5.5 HOGGED FUEL BOILER AND ELECTRIFIED FILTER BED:

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.5.1*	Order No. 15AQ-E631, Issued 11/30/2015, Approval Condition 2.1.2	F S	Opacity from the EFB stack shall not exceed 10% for more than 6 minutes in one hour, as measured by RM 9.	RM 9	2M
5.5.2	Order No. 15AQ-E631, Issued 11/30/2015, Approval Condition 2.1.2	S	Opacity from the EFB stack shall not exceed 10% on an hourly average as measured by COMS.		15M
5.5.4*	Order No. 15AQ-E631, Issued 11/30/2015, Approval Condition 2.1.1	S	Emissions of PM-10 shall not exceed 0.030 gr/dscf @ 7% O2 and 19 tons/year.	RM 5	14M
5.5.5	Order PSD-X80-01, First Amendment, Issued 02/14/03, Approval Condition 1	F	Emissions of particulate matter shall not exceed 0.04 gr/dscf ⁵ .	RM 5	14M
5.5.6	Order PSD-X80-01, First Amendment, Issued 02/14/03, Approval Condition 1	F	Annual emissions of particulate matter shall not exceed 196 tons.	RM 5	14M
5.5.7	WAC 173-400-070(2)(b), 10/06/2018 WAC 173-400-070(2)(b), 8/16/2018	F S	All hogged fuel boilers shall utilize RACT and shall be operated and maintained to minimize emissions.		None
5.5.8	Order No. 15AQ-E631, Issued 11/30/2015, Approval Condition 2.5	S	Hogged fuel boiler shall not be operated above the following steaming rates: 40,000 lb/hr between 5/1 and 9/30 45,000 lb/hr between 10/1 and 4/30.		13M

⁵ See §19.2 of Statement of Basis

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.5.9	Order No. 15AQ-E631, Issued 11/30/2015, Approval Condition 2.6	S	The hogged fuel boiler abort gate shall be used only in specific emergency situations. The boiler shall not be operated when exhaust gases bypass the EFB.		18M
5.5.10	Order No. 15AQ-E631, Issued 11/30/2015, Approval Condition 2.7	S	The continuous oxygen monitoring system shall be operated in accordance with the Q/A Plan.		13M, 16M
5.5.11	Order No. 15AQ-E631, Issued 11/30/2015, Approval Condition 2.4	S	O&M manual shall be followed. Copy of O&M manual and this permit shall be kept in the boiler room and accessible to permittee and regulatory inspectors.		16M
5.5.12	40 CFR 64.7(b)	F	The permittee shall maintain the monitoring equipment specified in MRRR 13M, including but not limited to, maintaining necessary parts for routine repairs of the equipment.		12M
5.5.13	Order PSD-X80-01, First Amendment, Issued 02/14/03, Approval Condition 5	F	All equipment must be operated in accordance with the information contained within the PSD application.		3M

5.6 CLEAVER BROOKS CBEX ELITE NATURAL GAS (NG) BOILERS:

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.6.1	Order No. 15AQ-E631, Issued 11/30/2015, Approval Condition 3.1, 3.8.1	F S	Fueled by pipeline quality natural gas only.		29M
5.6.2	Order No. 15AQ-E631, Issued 11/30/2015, Approval Condition 3.2	F S	Nitrogen oxide (NOx) emission shall not exceed 9 parts per million by volume (ppmv) at 3% O ₂ .		28M
5.6.3	Order No. 15AQ-E631, Issued 11/30/2015, Approval Condition 3.3	S	Carbon monoxide (CO) emissions shall not exceed 30 parts per million by volume (ppmv) at 3% O ₂ .		28M
5.6.4	Order No. 15AQ-E631, Issued 11/30/2015, Approval Condition 3.4	F S	Opacity from the NG boiler stacks shall not exceed 5% for more than 6 minutes in one hour, as measured by RM 9.	RM 9	2M
5.6.5	Order No. 15AQ-E631, Issued 11/30/2015, Approval Condition 3.5	S	O&M manual shall be followed, kept updated, and easily accessible for inspection by Ecology personnel.		16M
5.6.6	Order No. 15AQ-E631, Issued 11/30/2015, Approval Condition 3.6, 3.8.2, 3.9	F S	Continuous compliance shall be demonstrated by conducting a tune up every 5 years as specified in 40 CFR Part 63 Subpart DDDDD, §63.7540(a)(10)(i) through (vi) Each burner must be inspected at least once every 72-months		28M, 29M

5.7 PCWP MACT: GENERAL CONDITIONS:

Sections 5.7 and 5.8 of this permit are for the implementation of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Plywood and Composite Wood Products (PCWP), 40 CFR 63 Subpart DDDD, referred to as the PCWP MACT. Except where this permit is more restrictive, the permittee shall comply with the requirements of 40 CFR 63 Subpart DDDD.

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.7.1	40 CFR 63.2290	F	40 CFR 63, Subpart DDDD, Table 10 ⁶ shows which parts of the General Provisions in §§63.1 through 63.13 apply to the permittee.		None
5.7.2*	40 CFR 63.2250(a)	F	The permittee must be in compliance with the compliance options, operating requirements, and the work practice requirements in this subpart at all times, except; prior to process unit initial startup; and during the routine control device maintenance exemption specified in §63.2251 ⁷ . The compliance options, operating requirements, and work practice requirements do not apply during times when the process unit(s) subject to the compliance options, operating requirements, and work practice requirements are not operating, or during periods of startup, shutdown, and malfunction. Startup and shutdown periods must not exceed the minimum amount of time necessary for these events. Compliance determinations will be made using the methods in 40 CFR 63.6 (f)(2) & (3).		20M – 26M
5.7.3	40 CFR 63.2250(b)	F	The permittee must always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1).		26M
5.7.4*	40 CFR 63.2250(c)	F	The permittee must develop a written SSMP according to the provisions in §63.6(e)(3).		26M

⁶ Attachment 9

⁷ The routine control device maintenance exemption applies only to the thermal oxidizer (RTCO). See condition 5.9.1.

5.8 PCWP MACT COMPLIANCE OPTIONS, OPERATING REQUIREMENTS AND WORK PRACTICE REQUIREMENTS:

5.8.1 Softwood veneer dryers.

The following apply to veneer dryers 1, 2 & 3.

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.8.1.1	40 CFR 63.2240(b)	F	The permittee must use an emissions control system and demonstrate that the resulting emissions meet the compliance options in table 1B and the operating requirements in Table 2 of 40 CFR 63 Subpart DDDD. Initial compliance shall be demonstrated according to 40 CFR 63 Subpart DDDD Table 5, using performance test methods in 40 CFR 63 Subpart DDDD, Table 4.	25A	19M
5.8.1.2*	40 CFR 63, Subpart DDDD, Table 2(1) ⁸ , <i>Operating Requirements</i>	F	For thermal oxidizer, maintain the 3-hour block average firebox temperature above the minimum temperature established during the performance test.		20M, 21M
5.8.1.3	40 CFR 63.2251 (b), (d), (e)	F	The compliance options and operating requirements do not apply when thermal oxidizer maintenance covered under the routine control device maintenance exemption submitted on 8/7/2008 ⁹ is performed. The routine control device maintenance exemption must not exceed 0.5 % of annual uptime for the veneer dryers. The permittee must minimize, to the extent practical, startup and shutdown of the thermal oxidizer must be scheduled during times when the veneer dryers are also shut down.		21M, 23M
5.8.1.4*	40 CFR 63, Subpart DDDD, Table 2(2), <i>Operating Requirements</i>	F	For catalytic oxidizer. maintain the 3-hour block average catalytic oxidizer temperature above the minimum temperature established during the performance test		20M

⁸ Attachment 3

⁹ Attachment 1

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
5.8.1.5*	40 CFR 63, Subpart DDDD, Table 2(2), <i>Operating Requirements</i>	F	For catalytic oxidizer, check the activity level of a representative sample of the catalyst at least every 12 months, and take any necessary corrective action to ensure that the catalyst is performing within its design range.		21M
5.8.1.6	40 CFR 63, Subpart DDDD, Table 3 ¹⁰ , <i>Work Practice Requirements</i>	F	Minimize fugitive emissions from the dryer doors (through proper maintenance procedures) and the green end of the dryers (through proper balancing of the heated zone exhausts).	None	25M

5.8.2 Group 1 Miscellaneous Coating Operations

Condition Number	Applicable Requirement	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR
5.8.2.1	40 CFR 63, Subpart DDDD, Table 3, <i>Work Practice Requirements</i>	F	Use non-HAP coatings as defined in §63.2292. HAP contents shall be below 0.1 percent by mass for Occupational Safety and Health Administration-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and below 1.0 percent by mass for other HAP compounds.		24M

¹⁰ Attachment 4

6. MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS

FACILITY WIDE

No MRRR Required:

No specific monitoring can reasonably be required for these requirements. The nature of the requirements makes it necessary to rely on the good faith of the permittee to conscientiously monitor site operations and to promptly report any deviations. The permittee is required to certify compliance with these conditions annually. Determination of compliance may be based on a reasonable and good faith effort to identify any deviations during the reporting period.

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

- 1) A record of all written complaints, complaints received by telephone or complaints received in person.
- 2) Time, date, and duration of the deviation.
- 3) Cause of the deviation.
- 4) Estimate of excess emissions and magnitude of deviation.
- 5) Corrective action taken and the results of such action.

[WAC 173-401-615(1)(b), 9/16/2002] *INCLUDES GAP-FILLING

2M. The permittee shall conduct monitoring in accordance with the following.

- 1) At least monthly, the permittee shall observe points of visible and PM emissions from emission units and activities to which opacity and/or particulate standards apply. The survey shall also be conducted when visible emissions are observed by facility personnel and reported to personnel responsible for environmental compliance. Facility personnel in general shall be made aware of their responsibility to report visible emissions.
 - 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 ¼ mile from the source.
 - i) The survey shall be conducted while the facility process associated with the emission point is in operation.
 - ii) The observer will be trained in the general procedures for determining the presence of visible emissions (i.e. effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, observer position relative to source and sun, and the presence of uncombined water).
 - iii) The survey shall consist of a minimum of four consecutive 15-second visual observations of each stack or emission point to identify whether the emission point under observation exhibits visible emissions.

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- iv) Records shall be made of each survey, including at least: the emission points observed, the name of the observer, the date and time of the observation, the emission points observed, weather conditions and the presence or absence of visible emissions.
 - b) If visible emissions are observed to be zero, no further action is required.
 - c) If visible emissions are observed—as soon as possible, but no later than 24 hours after the observation, the permittee shall verify and certify that:
 - i) The emissions are not the result of equipment malfunction, and the equipment from which the emissions are released is performing its normal, designed function.
 - ii) Air pollution control equipment, if any, is being operated in accordance with normal operating procedures.
 - iii) For fugitive emissions, reasonable precautions are being taken to minimize emissions
 - d) If any of the above are not being met, corrective action must be taken as soon as possible, but no later than 72 hours from the initial observation.
 - e) If, or when 3)(a), 3)(b) and 3)(c) are being met:
 - i) If no visible emissions are observed, no further action is required.
 - ii) If visible emissions exceed the applicable standard, the permittee shall initiate appropriate corrective action to address the problem and prevent further violations within 24 hours.
 - iii) Once corrective action has been taken and results in a return to conditions under which visible emissions are not observable via the method outlined in 1) above, no further corrective action is required, otherwise the permittee shall perform a RM9 test to demonstrate a return to compliance. The results of the test shall be submitted to Ecology within two working days of the test.
 - (1) For method 9, a test shall consist of certified opacity readings taken at 15-second intervals over a period of at least six consecutive minutes (24 readings).
 - 2) The permittee shall maintain the following records for at least five years:
 - a) A list of all facility personnel trained per a), and a list of all facility personnel with current RM9 certification.
 - b) For each exceedance of the opacity standard identified under a)9)(b)(ii) above:
 - i) The date and time the exceedance was identified.
 - ii) A description of the exceedance.
 - iii) Description of corrective action taken.
 - iv) Copies of all RM9 observations documenting an exceedance or the re-establishment of normal operations.
 - 3) Any excess emission identified in 1)(e)(ii) shall be reported according to Standard Condition 2.10.1

[Order No. 07AQ-E243, 2nd Amendment, Issued 12/13/2011, Conditions 3.6 & 3.7],[WAC 173-401-615(1)(b), & (3), 9/16/2002], [WAC 173-401-630(1), 02/03/2016] *INCLUDES GAP-FILLING

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

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

The permittee 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 business days. All such discoveries shall be reported to Ecology as required by Standard Condition 2.10.1.3 of this permit.

[WAC 173-401-615(1)(b), (c), 9/16/2002] *INCLUDES GAP-FILLING

- 4M.** The following shall apply generally, facility wide:

- 1) Monitoring – At least once per month the permittee shall perform complete walk-around surveys for the purpose of determining the presence of visible emissions throughout the facility site. 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.
- 2) Recordkeeping – 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, an indication of whether any visible emissions were observed, a description of the cause of the visible emissions, the corrective action taken, and the results of such action.
- 3) Reporting – Monthly reporting of deviations shall be performed as described in Standard Condition 2.10.1, as well as annual certification of compliance as described in Standard Condition 2.10.3. Any monthly deviation reports documenting visible emissions observed 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), 9/16/2002] *INCLUDES GAP-FILLING

- 5M.** The permittee shall determine the sulfur content of fuels used, except that no determination is needed for hog fuel¹¹, natural gas, propane (LPG) or diesel fuel with less

¹¹ See definition of hog fuel in Attachment 1 of SOB.

than two percent sulfur by weight. Information from fuel suppliers or generally published information on the sulfur content of other fuels may be referenced. Use of any fuel with sulfur content greater than two percent by weight may require a reference method source test during the use of that fuel. The permittee may certify compliance with Condition 5.1.14 if no fuels with sulfur content greater than two percent by weight are combusted.

[WAC 173-401-615(1)(b), 9/16/2002]. *INCLUDES GAP-FILLING

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

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

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

[Order 19AQ-E058, Issued 08/30/2019, Approval Conditions 2 & 7]

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

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

[Order 19AQ-E058, Issued 08/30/2019, Approval Condition5] *INCLUDES GAP-FILLING

VENEER DRYERS 2 AND 3

8M. The following records shall be maintained.

- 1) Total plywood production (expressed as 3/8 inch plywood equivalent).
-

2) Records of the operating rate of the FBC-veneer dryer system.

[Order No.09AQ-E283, issued 2/02/2009, Approval Conditions 2.2], [PSD-X80-01 First Amendment, Issued 02/14/03, Approval Conditions 6a], [WAC 173-401-615(1)(b), 9/16/2002]

9 M. The permittee shall create, follow, and maintain O&M manuals for veneer dryers #2 and #3. The O&M manuals shall be maintained in an up-to-date manner, well organized, and easily accessible for inspection by Ecology personnel. The O&M manual shall be reviewed at least annually, and updated within 30 days of any modifications to the veneer dryers or operating procedures. Manufacturer's instructions may be referenced. Emissions resulting from failure to follow the requirements of the O&M manuals or manufacturer's instructions may be considered proof that equipment was not properly operated, maintained and tested. Regular maintenance records shall be kept at the facility. Manufacturer's instructions and maintenance records shall be readily accessible, available upon request, and maintained for at least five years. O&M manuals shall include, at a minimum:

- 1) Normal operating parameters for the dryer and emission control system.
- 2) A maintenance schedule for the dryer and emission control system.
- 3) A list of all monitoring and recordkeeping requirements that apply to dryers #2 and #3.
- 4) A description of any monitoring procedures that apply to dryers #2 and #3.
- 5) A description of actions to be taken in response to abnormal control system operation.

[Order No.09AQ-E283, issued 2/02/2009, Approval Condition 3.

ESP/RTCO/ESP PREHEATER

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

The O&M manual shall at a minimum include:

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

[Order No. 07AQ-E243, 2nd Amendment, Issued 12/13/2011, Conditions 4.1, 4.1.1 through 4.1.6]

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

- 1) Source testing:
 - a) The permittee conducted an initial performance test for NO_x, CO, VOC, PM and SO₂ with the oxidizer operating in thermal mode on March 5, 2009. NO_x, CO, VOC and PM shall be repeated every five years. VOC shall be measured at the oxidizer inlet as well as at the exhaust.
 - b) The permittee shall conduct an initial performance test for NO_x, CO, VOC, PM and SO₂ within 180 days of startup in catalytic mode. VOC and CO shall be measured at the oxidizer inlet as well as at the exhaust. Following the initial test, testing for NO_x, CO, VOC and PM shall be repeated every 12 months until the oxidizer has been tested three times. Following the first three tests, Ecology may approve a reduction in testing frequency to not less than once every five years.
- 2) Testing shall be conducted according to MRRR 19M.
- 3) Monitoring: the permittee shall monitor and maintain records of the following:
 - c) For each ESP T-R set, daily records of:
 - i) Primary and secondary voltage.
 - ii) Spark rate.
 - iii) T-R set status.
 - d) RTCO natural gas usage, by month.
 - e) Startup and shutdown records for the RTCO and ESP, maintained per MRRR 21M.
 - f) Nature and details of RTCO and ESP malfunction, including date, time, duration, cause and corrective action taken, maintained per MRRR 21M.
 - g) Maintenance and inspection records for all pollution control equipment.
 - h) FBC operating rate.

[Order No. 07AQ-E243, 2nd Amendment, Issued 12/13/2011, Approval Conditions 3.7, 5.1, 5.1.1, 5.2.3, 5.2.3.1 through 5.2.3.2, 5.2.4, 5.2.5, & 5.2.6], [PSD-X80-01 First Amendment, Issued 02/14/03, Approval Conditions 6a]

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

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

- 1) Applicability: The CAM requirements in 40 CFR Part 64 apply to the Hog Fuel boiler and FBC with respect to the particulate emission limitations identified in Conditions 5.4.2, 5.4.3 and 5.5.5.
- 2) Monitoring Operation: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring at all

- times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions¹², associated repairs, and required quality assurance or control activities shall not be used for CAM purposes, including data averages and calculations, or fulfilling a minimum data availability requirement. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system.[40 CFR 64.7(c) 7/1/19]
- 3) Proper maintenance: At all times, the permittee shall maintain the monitoring, including maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b) 7/1/19]
 - 4) Minimum data availability: The permittee shall recover valid monitoring data for at least 90 percent of the time the emission unit is required to be monitored each month. [40 CFR 64.6(c)(4) 7/1/19]
 - 5) Response to excursions¹³ or exceedances¹⁴: An excursion shall occur whenever an indicator is not within the range or limit in Table 12M.1. or 12M 2. The permittee shall respond to excursions by restoring the pollutant-specific emission unit to normal operation (i.e. indicators returned to within range) as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions).
 - a) Corrective actions may include: initial inspection and evaluation, documenting that operations returned to normal without operator action, follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard.
 - b) All excursions shall be included in the monthly deviation report required by standard condition 2.10.1. Any excursion in which the unit cannot be returned to within the indicator range within 24 hours of discovery shall be considered an exceedance, and identified as such in the monthly deviation report.
 - c) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. [40 CFR 64.7(d)(2) (7/1/19)]
 - d) Upon discovery that the monitoring as designed is insufficient to provide indications of all deviations, the permittee shall notify Ecology of the monitoring deficiency. Notification shall be included in the monthly deviation report.

¹² A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

¹³ An *excursion* is any departure from an indicator range established for monitoring, consistent with any averaging period specified for averaging the results of the monitoring.

¹⁴ An *exceedance* is any condition detected by monitoring that provides data in terms of an emission limitation and that indicates that emissions are greater than the limitation, consistent with any averaging period specified.

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- 6) CAM Recordkeeping:
- a) The permittee 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 required supporting information (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Records shall be maintained for a period of 5 years. [40 CFR 64.9(b)(1) (7/1/19)]
 - b) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements. [40 CFR 64.9(b)(2) (7/1/19)]
- 7) CAM Reporting: The semi-annual monitoring report required by Standard Condition 2.10.2 shall include the following:
- a) Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken.
 - b) Summary information on the number, duration, and cause (including unknown cause, if applicable) for monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks).
 - c) A description of any actions taken during the reporting period to implement any QIP's in effect.
 - d) Any notice required by 40 CFR 64.7(e) of the failure of CAM monitoring to indicate an excursion or exceedance during a period in which the permittee identified a failure to meet an emission limitation. [40 CFR 64.9(a)(2)(i),(ii),(iii) and 64.7(e) (7/1/19)]
- 8) Annual Compliance Certification: The compliance certification required by Standard Condition 2.10.3 shall identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance has occurred.[40 CFR 70.6(c)(5)(iii)(C) (6/27/03)]

Table 12 M.1 Hog Fuel Boiler CAM				
Pollutant-specific emission limit	Indicator	Monitoring Method	Monitoring Frequency	Quality Assurance Requirements
PM limit referenced in Condition 5.5.5	2-day average multiclone Δp between 1" & 5" w.c.	Direct read	8 hours	Follow manufacturer's calibration, inspection, maintenance, and operating requirements
	2-day average EFB Δp less than 6" w.c.	Direct read	8 hours	
	2-day average EFB bed voltage greater than 5.0 kV	Direct read	8 hours	
	2-day average EFB ionizer voltage greater than 20 kV	Direct read	8 hours	

Table 12M.2 FBC CAM				
Pollutant-specific emission limit	Indicator	Monitoring Method	Monitoring Frequency	Quality Assurance Requirements
PM limit referenced in Condition 5.4.2	ESP T/R set #1 Secondary voltage <30 kV (hourly average).	electronic	Monitored continually, hourly average calculated every 60 minutes	Follow manufacturer's calibration, inspection, maintenance, and operating requirements
	ESP T/R set #2 Secondary voltage <25 kV (hourly average)	electronic	Monitored continually, hourly average calculated every 60 minutes	
	ESP T/R set #3 Secondary voltage <25 kV (hourly average)	electronic	Monitored continually, hourly average calculated every 60 minutes	

HOGGED FUEL BOILER, ELECTRIFIED FILTER BED

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

- 1) The following monitoring shall be performed and equipment installed as specified:
 - a) A daily monitoring log shall be maintained with the following parameters for the electrified filter bed/multiclone control system recorded at least once per day:
 - i) EFB Bed voltage (KVDC).
 - ii) EFB Ionizer voltage (KVDC).
 - iii) EFB Ionizer current (Amps).
 - iv) EFB Inlet temperature (°F).
 - v) EFB Outlet temperature (°F),
 - vi) EFB differential pressure (in. w.c.).
 - vii) Multiclone differential pressure (in. w.c.).
 - viii) Date and time.
 - b) A daily monitoring log shall be maintained with the following parameters for the hogged fuel boiler recorded at least once per day:
 - i) Steam production (lbs/hour).
 - ii) Stack temperature (°F).
 - iii) Boiler O₂ (%).
 - iv) Pressure (in. w.c.) at the following locations: boiler under grate, boiler outlet, furnace pressure, F.D. fan outlet, and furnace draft.
 - v) Date and time.
 - c) Equipment shall continue to be operated providing continuous measurement of the oxygen content (% O₂) of the hogged fuel boilers exhaust gas. The continuous measurement equipment shall conform to 40 CFR 60, Appendix B, Performance Specification 3. The Quality Assurance Plan as submitted to Ecology shall be updated upon request by Ecology

[PSD-X80-01 First Amendment, Issued 02/14/03, Approval Condition 6b], [Order No. 15AQ-E631, Issued 11/30/2015, Approval Condition 2.1, 2.5, 2.6 & 2.7]

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

- 1) Particulate matter shall be reported for front-half (RM 5) and back-half (RM 202). Particulate matter emissions shall be reported in grains per dry standard cubic foot of exhaust gas (gr/dscf) as well as pounds per hour (lb/hr).
- 2) The testing shall consist of at least three runs, with the boiler operating at a minimum of 90 percent of maximum production rate. The maximum production rate shall be

the highest weekly average production rate over the past two years. The boiler shall be operated by the normal boiler operator during stack testing.

- 3) The testing will consist of two runs at normal boiler operation and one run including grate ash cleaning and/or soot blowing. A weighted average of the three runs shall be used to calculate emissions.
- 4) All monitored boiler and control device operating parameters shall be recorded during the entire duration of the testing and included in the test report.

[Order No. 15AQ-E631, Issued 11/30/2015, Approval Condition 2.1.3 & 2.1.4, 2.2, 2.3, 2.4], [WAC 173-401-615(1)(b), 9/16/2002], [WAC 173-401-630(1), 02/03/2016]

*INCLUDES GAP-FILLING

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

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

- 1) A copy of the QA Plan.
- 2) Records of all quality assurance procedures performed for a period of five years.
- 3) Chart recorder readings or computer file data from the COMS.

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

[Order No. 15AQ-E631, Issued 11/30/2015, Approval Condition 2.1.2], [WAC 173-401-630(1), 02/03/2016]

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

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

[Order No. 15AQ-E631, Issued 11/30/2015, Approval Condition 2.4]

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

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

[Order No. 15AQ-E631, Issued 11/30/2015, Approval Condition 2.2, 2.5]

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

- 1) The abort gate shall be used only in emergency situations caused by one of the following:
 - a) Failure of the EFB FD fan.
 - b) Fire in the EFB system.
 - c) Power outage to the EFB.
 - d) Plugging of the EFB filter media.
- 2) Whenever the abort gate is used, fuel feed to the boiler must be stopped and the boiler taken off line.
- 3) Any time the abort gate is used, the permittee shall notify Ecology by telephone or fax no later than the next business day, and in writing within five days.
- 4) Records documenting the nature and details of any situation in which the abort gate located downstream of the multiclone on the hogged fuel boiler is utilized and boiler exhaust gases bypass the EFB shall be maintained.
- 5) Under no circumstances shall the boiler be operated when exhaust gases bypass the EFB.

[Order No. 15AQ-E631, Issued 11/30/2015, Approval Condition 2.6]

PCWP MACT

19M. PCWP MACT Testing*

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

20M. PCWP MACT Monitoring

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

21M. PCWP MACT Recordkeeping

- 1) The permittee must keep the following records:
 - a) A copy of each notification and report that the permittee submitted to comply with 40 CFR 63 Subpart DDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).
 - b) Startup, shutdown, and malfunction plan records required by 40 CFR 63.6(e)(3)(iii) through (v).
 - c) Startup, shutdown, and malfunction records required by 40 CFR 63.10(b)(2)(i) through (v).
 - d) Documentation of the approved routine control device maintenance exemption for the RTO, including the information required for §63.2281(c)(5).
 - e) CPMS records required by 40 CFR 63.10 (b)(2)(vi) through (xi).
 - f) CPMS records required by 40 CFR 63.10(c)(1), (5) through (8) and (10) through (15).¹⁵
 - g) If operating a catalytic oxidizer, records of annual catalyst activity checks and subsequent corrective action.
 - h) Performance test records as required by 40 CFR 63.7(g)(3).
- 2) The permittee must maintain records in a form suitable and readily available for expeditious review as specified in 40 CFR 63.10(b)(1)

¹⁵ The facility startup, shutdown and malfunction plan or records may satisfy the requirements of §63.10 (c)(10) through(12)

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- 3) Keep each record for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR 63.10 (b)(1).

[40 CFR 63.2282, 2283, 7/1/2019]

22M. PCWP MACT Notification*

- 1) The permittee submit the following notifications by the dates specified
- a) 40 CFR 63.8(f)(4) *Request to use alternative monitoring procedure*, if applicable.
 - b) 40 CFR 63.8 (f)(6) *Alternative to RATA*, if applicable.
 - c) 40 CFR 63.9(b) *Initial applicability notification for existing sources*.
 - d) 40 CFR 63.9(c) *Request for compliance extension*, if applicable.
 - e) 40 CFR 63.9(d) *Special compliance requirements*, if applicable.
 - f) 40 CFR 63.9(e) *Notification of performance test*.
 - g) 40 CFR 63.9(g)(1) *Notification of date of CMS performance evaluation*
 - h) 40 CFR 63.9(h)(2)(ii) *Notification of Compliance Status* for each performance test, design evaluation or other initial compliance demonstration as specified in Tables 4, 5 and 6.
 - i) For each initial compliance demonstration that does not require a source test, submit notification within 30 calendar days.
 - ii) For each initial compliance demonstration that requires a source test, submit notification within 60 calendar days of test completion
 - i) 40 CFR 63.9(j) *Notification of change in information already provided* within 15 calendar days of the change.
 - j) Request for routine control device maintenance exemption per 63.2251 no later than 30 days before the compliance date.
 - k) Notify EPA Administrator at least 30 days before:
 - i) Modifying or replacing the control system for any process unit subject to the compliance options and operating requirements.
 - ii) Changing a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter.

[40 CFR 63.2280 (a),(b),(c),(d),(e), (g)(1)&(3), 7/1/2019].

23M. PCWP MACT Reports

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

- 1) A semi-annual compliance report containing the following:
- a) The information in 40 CFR 63.2281(c)(1) through (8).
 - b) For each deviation from a compliance option or operating requirement and for each deviation from the work practice requirements in 40 CFR 63, Subpart DDDD, Table 8¹⁶ where a CMS is not used to comply with the compliance options,

¹⁶ Attachment 8

operating requirements or work practice requirements, the information in 40 CFR 63.2281 (c)(1) through (6) and 40 CFR 63.2281 (d)(1) and (2). This includes periods of startup, shutdown, and malfunction and routine control device maintenance.

- c) For each deviation from a compliance option or operating requirement where a CMS is used to comply with the compliance options or operating requirements the report must include the information in 40 CFR 63.2281 (c)(1) through (6) and 40 CFR 63.2281 (e)(1) through (11). This includes periods of startup, shutdown and malfunction and routine control device maintenance.

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

The report must include all deviations as defined in subpart DDDD. Submittal of a complete report will satisfy any obligation to report the same deviations in the semi-annual monitoring report required by standard condition 2.10.2 of the AOP.

- 2) An immediate startup, shutdown, and malfunction report for a startup, shutdown, or malfunction during the reporting period when action taken is not consistent with the startup, shutdown, and malfunction plan in MRRR 26M. The report must contain the following, as required by 40 CFR 63.10(d)(5)(ii):
- a) An immediate report of actions taken, submitted by telephone or fax within two working days of commencing actions inconsistent with the SSM plan.
 - b) A follow-up report by letter, postmarked within seven working days after the end of the event that contains the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy. Report explains the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction plan, describing all excess emissions and/or parameter monitoring exceedances which are believed to have occurred (or could have occurred in the case of malfunctions), and actions taken to minimize emissions in conformance with §63.6(e)(1)(i).

[40 CFR 63.2281, 7/1/2019]

24M. Group 1 Miscellaneous Coating Operations

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

[40 CFR 63.2241(a), 63.2260(b),(c), 63.2271(b), 63.2281, 40 CFR 63, Subpart DDDD, Tables 6(5)¹⁷, 8(5)¹⁸ and 9(1) & (2)]

25M. Fugitive emissions from dryer doors

- 1) Develop a plan for review and approval for minimizing fugitive emissions from the veneer dryer heated zones, and submit the plan with the Notification of Compliance Status required by MRRR 22M 1)h).
- 2) Maintain records documenting that the plan for minimizing fugitive emissions is being followed.
- 3) Any failure to follow the plan must be reported as a deviation in the Compliance Report required by MRRR 23M.

[40 CFR 63.2241, 63.2260(b),(c), 63.2265, 63.2271(a),(b), 63.2281, 40 CFR 63, Subpart DDDD, Tables 6(3), 8(3) and 9(1) & (2)¹⁹, 40CFR 63.2282 (b)]

26M. Startup, Shutdown and Malfunction Plan

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

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

CLEAVER BROOKS CBEX ELITE NATURAL GAS (NG) BOILERS

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

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

[Order No. 15AQ-E631, Issued 11/30/2015, Approval Condition 3.5]

¹⁷ Attachment 6

¹⁸ Attachment 8

¹⁹ Attachment 9

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

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

[Order No. 15AQ-E631, Issued 11/30/2015, Approval Condition 3.6]

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

- 1) Annual fuel usage for the boilers in cubic feet, therms or gallons based on monthly fuel combustion records
- 2) Records of the boiler tune-ups and burner inspections.
- 3) Boiler compliance report must cover five-year periods from January 1 to December 31. The compliance report must contain the following as specified in §63.7550(c)(5)(i) through (iv) and (xiv):
 - a) Company and Facility name and address.
 - b) Process unit information.
 - c) Date of report, include beginning and ending dates of the reporting period.
 - d) The total operating time during the reporting period.
 - e) The date of the most recent tune-up for each unit and most recent inspection date for each burner.

[Order No. 15AQ-E631, Issued 11/30/2015, Approval Condition 3.1 through 3.4, 3.6, 3.8, 3.9]

7. PERMIT SHIELD CONDITIONS

7.1 PERMIT SHIELD:

Compliance with the terms of this Title V permit shall be deemed compliance with the applicable requirements upon which that condition is based, as of the date of permit issuance. The permit shield does not apply to any insignificant emissions units or activity designated under WAC 173-401-530.

7.2 INAPPLICABLE OR EXEMPT REQUIREMENTS:

The requirements shown in Table 7.1, as of the date of permit issuance, have been determined not to apply to the source, or to the specific emission units or activities indicated. Commencing the date of permit issuance, the permit shield shall cover the requirements so identified. Applicability of a requirement may be triggered by a future action or emissions increase.

Table 7.1: The following table includes only requirements for which inapplicability is based on a determination or comparison of size, age, emissions or other characteristic of the emission unit with the applicability criteria in the requirement. Some of the requirements listed below may become applicable during the permit term due to an invoking event, but are deemed inapplicable at the time of permit issuance. Requirements which are subject to terms of this permit, requirements which are inherently inapplicable (i.e., the source is not in the category subject to a regulation), or requirements which apply only to regulatory agencies are not included.

Table 7.1:			
Emission Unit or Activity	Requirement	Description	Basis of non-applicability
Hogged Fuel Boiler	40 CFR 60, Subpart Dc	Standards of Performance for steam generating units for which construction, modification, or reconstruction commenced after June 9, 1989	The boiler was constructed prior to June 9, 1989, and has not been reconstructed
Hogged Fuel Boiler	40 CFR 63, Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters	The boiler is an affected source as defined in 40 CFR 63.7490. Subpart DDDDD was vacated by the United States Court of Appeals on June 8, 2007. At the time of issuance, the requirements of Subpart DDDDD will be applicable once the permittee installs adequate emission control technologies to achieve final compliance with Subpart DDDDD emission limits as specified in Approval Order 15AQ-E631, Issued 11/30/2015. The HFB shall not be operated until such emission control technologies are installed.
Hogged Fuel Boiler	40 CFR 64	Compliance Assurance Monitoring (CAM) for NO _x , CO, SO ₂ , VOC and Mercury emissions.	The boiler does not use control devices to comply with limits on NO _x , CO, SO ₂ , VOC and mercury emissions.

Table 7.1:			
Emission Unit or Activity	Requirement	Description	Basis of non-applicability
Hogged Fuel Boiler	40 CFR 60, Subpart CCCC	Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for which construction is commenced after November 30, 1999 or for which modification or reconstruction is commenced on or after June 1, 2001	The boiler does not meet the definition of Commercial and Industrial Solid Waste Incineration Unit in 40 CFR 68.2875.
FBC	40 CFR 64	Compliance Assurance Monitoring (CAM) for NO _x , CO, SO ₂ and Mercury emissions.	The FBC does not use control devices to comply with limits on NO _x , CO, SO ₂ and mercury emissions
FBC	40 CFR 64	Compliance Assurance Monitoring (CAM) for VOC	Emission limitations or standards proposed after November 15, 1990 pursuant to section 111 or 112 of the Clean Air Act are exempt.
FBC	40 CFR 60, Subpart CCCC	Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for which construction is commenced after November 30, 1999 or for which modification or reconstruction is commenced on or after June 1, 2001	The FBC does not meet the definition of Commercial and Industrial Solid Waste Incineration Unit in 40 CFR 68.2875
Veneer dryers	63.6(h)(1)-(9)	Requirements for opacity and visible emission standards.	Does not apply to Subpart DDDD.

Attachment 1: Routine Control Device Maintenance Exemption

Boise Wood Products
1274 Boise Road
Kettle Falls, WA 99141



August 7, 2008

COPY

Nancy Helm
Manager – Federal and Delegated Air Programs Unit
EPA Region X
1200 Sixth Avenue (AWT – 107)
Seattle, WA 98101

Dear Ms. Helm:

Re: PCWP MACT (40 CFR Part 63, Subpart DDDD) Request for Routine Control Device Maintenance Exemption for: Boise Building Solutions Manufacturing, LLC – Kettle Falls Plywood, Title V AOP No. 03AQER-5613.

Boise Building Solutions Manufacturing, LLC (Boise) Kettle Falls Plywood Plant (the Facility) is subject to the Plywood and Composite Wood Panel (40 CFR Part 63, Subpart DDDD) MACT Standard (the Standard). The softwood veneer dryers at the Facility are subject to an emission limitation under the Standard, and Boise has installed a regenerative thermal oxidizer (RTO) to control the emissions from the heated zone of the veneer dryers. Boise is requesting a routine control device maintenance exemption for the RTO in accordance with §63.2251 of the Standard.

The exemption is justifiable because the unit routinely requires internal inspections and repairs, bakeouts, replacement of parts, and media replacement. Due to the high internal heat during normal operations, these maintenance activities cannot be performed while the unit is operating. Based on other units within the company, it typically requires 12 hours to cool down prior to entry by maintenance personnel and another 4 hours to heat up after maintenance is completed. Routine maintenance activities require from 1 hour for inspections to 40 hours for a full media replacement.

The Facility typically operates 24 hours/day, 7 days/week with one day shutdowns for holidays. The Facility schedules these routine maintenance activities when the Facility is shut down for holiday. However, due to the length of time these activities may require, including cool-down and warm up, the facility cannot always complete the activities during the holiday shutdown.

Ms. Nancy Helm
Page 2
August 7, 2008

To minimize emissions during maintenance, the Facility will, to the extent practical, perform the routine maintenance activities during process shutdowns. In addition, when the maintenance activity, including cool-down and warm-up cannot be completed while the dryers are shut down, the Facility will minimize emissions to the extent practical by: Ensuring that the dry electrostatic precipitator upstream of the RTO is operating during the period.

The routine control device maintenance exemption allowed for softwood veneer dryers under §63.2251 (b)(2) is 0.5% of the annual process operating uptime. Considering the plants normal operating schedule of approximately 8,400 hours/year, the exemption allows for approximately 42 hours per year of process operation when the RTO is off-line for routine maintenance.

We would appreciate your prompt approval of our request. Please contact Jennifer Wasley at 509-738-3219 if you need additional information.

Based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

Sincerely,



Thomas A. Insko
Inland Region Manager

cc: Dave Wendland, Washington Dept. of Ecology
Jennifer Wasley, Region Environmental Manager

Attachment 2: Required Data Elements for Annual Emission Inventory

Pt. 51, Subpt. A, App. A

Appendix A to Subpart A of Part 51—Tables

Table 1 to Appendix A of Subpart A—Emission Thresholds 1 by Pollutant for Treatment as Point Source Under 40 CFR 51.30

Pollutant	Every-year	Triennial	
	Type A sources 2	Type B sources	NAA sources 3
(1) SO ₂	≥2500	≥100	≥100. PM _{2.5} (serious) ≥70.
(2) VOC	≥250	≥100	≥100. O ₃ (serious) ≥50. O ₃ (severe) ≥25. O ₃ (extreme) ≥10. PM _{2.5} (serious) ≥70.
(3) NO _X	≥2500	≥100	≥100.PM _{2.5} (serious) ≥70.
(4) CO	≥2500	≥1000	O ₃ (all areas) ≥100.CO (all areas) ≥100.
(5) Lead		≥0.5 (actual)	≥0.5 (actual).
(6) Primary PM ₁₀	≥250	≥100	≥100. PM ₁₀ (serious) ≥70.
(7) Primary PM _{2.5}	≥250	≥100	≥100. PM _{2.5} (serious) ≥70.
(8) NH ₃	≥250	≥100	≥100.PM _{2.5} (serious) ≥70.

1 Thresholds for point source determination shown in tons per year of potential to emit as defined in 40 CFR part 70, with the exception of lead. Reported emissions should be in actual tons emitted for the required time period.

2 Type A sources are a subset of the Type B sources and are the larger emitting sources by pollutant.

3 NAA = Nonattainment Area. The point source reporting thresholds vary by attainment status for SO₂, VOC, NO_X, CO, PM₁₀, PM_{2.5}, and NH₃.

Table 2 a to Appendix A of Subpart A—Facility Inventory 1 Data Elements for Reporting Emissions From Point Sources, Where Required by 40 CFR 51.30

Data elements
(1) Emissions Year.
(2) State and County FIPS Code or Tribal Code.
(3) Facility Site Identifier.
(4) Unit Identifier.
(5) Emission Process Identifier.
(6) Release Point Identifier.
(7) Facility Site Name.
(8) Physical Address (Location Address, Locality Name, State and Postal Code).
(9) Latitude and Longitude at facility level.
(10) Source Classification Code.
(11) Aircraft Engine Type (where applicable).
(12) Facility Site Status and Year.
(13) Release Point Stack Height and Unit of Measure.
(14) Release Point Stack Diameter and Unit of Measure.
(15) Release Point Exit Gas Temperature and Unit of Measure.
(16) Release Point Exit Gas Velocity or Release Point Exit Gas Flow Rate and Unit of Measure.
(17) Release Point Status and Year.
(18) NAICS at facility level.
(19) Unit Design Capacity and Unit of Measure (for some unit types).
(20) Unit Type.
(21) Unit Status and Year.
(22) Release Point Apportionment Percent.
(23) Release Point Type.
(24) Control Measure and Control Pollutant (where applicable).
(25) Percent Control Approach Capture Efficiency (where applicable).
(26) Percent Control Measures Reduction Efficiency (where applicable).
(27) Percent Control Approach Effectiveness (where applicable).

¹ Facility Inventory data elements need only be reported once to the EIS and then revised if needed. They do not need to be reported for each triennial or every-year emissions inventory.

Table 2 b to Appendix A of Subpart A—Data Elements for Reporting Emissions From Point, Nonpoint, Onroad Mobile and Nonroad Mobile Sources, Where Required by 40 CFR 51.30

Data elements	Point	Nonpoint	Onroad	Nonroad
(1) Emissions Year	Y	Y	Y	Y
(2) FIPS code	Y	Y	Y	Y
(3) Shape Identifiers (where applicable)		Y		
(4) Source Classification Code		Y	Y	Y
(5) Emission Type (where applicable)		Y	Y	Y
(8) Emission Factor	Y	Y		
(9) Throughput (Value, Material, Unit of Measure, and Type)	Y	Y	Y	
(10) Pollutant Code	Y	Y	Y	Y
(11) Annual Emissions and Unit of Measure	Y	Y	Y	Y
(12) Reporting Period Type (Annual)	Y	Y	Y	Y
(13) Emission Operating Type (Routine)	Y			
(14) Emission Calculation Method	Y	Y		
(15) Control Measure and Control Pollutant (where applicable)		Y		
(16) Percent Control Measures Reduction Efficiency (where applicable)		Y		
(17) Percent Control Approach Effectiveness (where applicable)		Y		
(18) Percent Control Approach Penetration (where applicable)		Y		

[73 FR 76552, Dec. 17, 2008, as amended at 80 FR 8796, Feb. 19, 2015; 81 FR 58149, Aug. 24, 2016]

Attachment 3: 40 CFR 63, Subpart DDDD, Tables 1B & 2

Table 1B to Subpart DDDD of Part 63—Add-on Control Systems Compliance Options

For each of the following process units . . .	You must comply with one of the following six compliance options by using an emissions control
Fiberboard mat dryer heated zones (at new affected sources only); green rotary dryers; hardboard ovens; press predryers (at new affected sources only); pressurized refiners; primary tube dryers; secondary tube dryers; reconstituted wood product board coolers (at new affected sources only); reconstituted wood product presses; softwood veneer dryer heated zones; rotary strand dryers; conveyor strand dryer zone one (at existing affected sources); and conveyor strand dryer zones one and two (at new affected sources)	(1) Reduce emissions of total HAP, measured as THC (as carbon) ^a , by 90 percent; or
	(2) Limit emissions of total HAP, measured as THC (as carbon) ^a , to 20 ppmvd; or
	(3) Reduce methanol emissions by 90 percent; or
	(4) Limit methanol emissions to less than or equal to 1 ppmvd if uncontrolled methanol emissions entering the control device are greater than or equal to 10 ppmvd; or
	(5) Reduce formaldehyde emissions by 90 percent; or
	(6) Limit formaldehyde emissions to less than or equal to 1 ppmvd if uncontrolled formaldehyde emissions entering the control device are greater

^aYou may choose to subtract methane from THC as carbon measurements.

Table 2 to Subpart DDDD of Part 63—Operating Requirements

If you operate a(n) . . .	You must . . .	Or you must . . .
(1) Thermal oxidizer	Maintain the 3-hour block average firebox temperature above the minimum temperature established during the performance test	Maintain the 3-hour block average THC concentration ^a in the thermal oxidizer exhaust below the maximum concentration established during the performance test.
(2) Catalytic oxidizer	Maintain the 3-hour block average catalytic oxidizer temperature above the minimum temperature established during the performance test; AND check the activity level of a representative sample of the catalyst at least every 12 months	Maintain the 3-hour block average THC concentration ^a in the catalytic oxidizer exhaust below the maximum concentration established during the performance test.

^aYou may choose to subtract methane from THC measurements.

Attachment 4: 40 CFR 63, Subpart DDDD, Tables 3 & 4

Table 3 to Subpart DDDD of Part 63—Work Practice Requirements

For the following process units at existing or new affected sources . . .	You must . . .
(3) Softwood veneer dryers	Minimize fugitive emissions from the dryer doors (through proper maintenance procedures) and the green end of the dryers (through proper balancing of the heated zone exhausts).
(5) Group 1 miscellaneous coating operations	Use non-HAP coatings as defined in §63.2292.

(1), (2), (4) not applicable to permittee

Table 4 to Subpart DDDD of Part 63—Requirements for Performance Tests

For . . .	You must . . .	Using . . .
(1) each process unit subject to a compliance option in table 1A or 1B to this subpart or used in calculation of an emissions average under §63.2240(c)	select sampling port's location and the number of traverse ports	Method 1 or 1A of 40 CFR part 60, appendix A (as appropriate).
(2) each process unit subject to a compliance option in table 1A or 1B to this subpart or used in calculation of an emissions average under §63.2240(c)	determine velocity and volumetric flow rate	Method 2 in addition to Method 2A, 2C, 2D, 2F, or 2G in appendix A to 40 CFR part 60 (as appropriate).
(3) each process unit subject to a compliance option in table 1A or 1B to this subpart or used in calculation of an emissions average under §63.2240(c)	conduct gas molecular weight analysis	Method 3, 3A, or 3B in appendix A to 40 CFR part 60 (as appropriate).
(4) each process unit subject to a compliance option in table 1A or 1B to this subpart or used in calculation of an emissions average under §63.2240(c)	measure moisture content of the stack gas	Method 4 in appendix A to 40 CFR part 60; OR Method 320 in appendix A to 40 CFR part 63; OR ASTM D6348-03 (IBR, see §63.14(b)).
(5) each process unit subject to a compliance option in table 1B to this subpart for which you choose to demonstrate compliance using a total HAP as THC compliance option	measure emissions of total HAP as THC	Method 25A in appendix A to 40 CFR part 60. You may measure emissions of methane using EPA Method 18 in appendix A to 40 CFR part 60 and subtract the methane emissions from the emissions of total HAP as THC.

Attachment 5: 40 CFR 63, Subpart DDDD, Table 5

Table 5 to Subpart DDDD of Part 63—Performance Testing and Initial Compliance Demonstrations for the Compliance Options and Operating Requirements

For each . . .	For the following compliance options and operating requirements . . .	You have demonstrated initial compliance if
(2) Process unit listed in Table 1B to this subpart	Reduce emissions of total HAP, measured as THC, by 90 percent	Total HAP emissions, measured using the methods in Table 4 to this subpart over the 3-hour performance test, are reduced by at least 90 percent, as calculated using the procedures in §63.2262; AND you have a record of the operating requirement(s) listed in Table 2 to this subpart for the process unit over the performance test during which emissions were reduced by at least 90 percent.
(3) Process unit listed in Table 1B to this subpart	Limit emissions of total HAP, measured as THC, to 20 ppmvd	The average total HAP emissions, measured using the methods in Table 4 to this subpart over the 3-hour performance test, do not exceed 20 ppmvd; AND you have a record of the operating requirement(s) listed in Table 2 to this subpart for the process unit over the performance test during which emissions did not exceed 20 ppmvd.
(4) Process unit listed in Table 1B to this subpart	Reduce methanol or formaldehyde emissions by 90 percent	The methanol or formaldehyde emissions measured using the methods in Table 4 to this subpart over the 3-hour performance test, are reduced by at least 90 percent, as calculated using the procedures in §63.2262; AND you have a record of the operating requirement(s) listed in Table 2 to this subpart for the process unit over the performance test during which emissions were reduced by at least 90 percent.
(5) Process unit listed in Table 1B to this subpart	Limit methanol or formaldehyde emissions to less than or equal to 1 ppmvd (if uncontrolled emissions are greater than or equal to 10 ppmvd)	The average methanol or formaldehyde emissions, measured using the methods in Table 4 to this subpart over the 3-hour performance test, do not exceed 1 ppmvd; AND you have a record of the operating requirement(s) listed in Table 2 to this subpart for the process unit over the performance test during which emissions did not exceed 1 ppmvd. If the process unit is a reconstituted wood product press or a reconstituted wood product board cooler, your capture device either meets the EPA Method 204 criteria for a PTE or achieves a capture efficiency of greater than or equal to 95 percent.
(7) Process unit listed in Table 1B to this subpart controlled by routing exhaust to a combustion unit	Compliance options in Table 1B to this subpart or the emissions averaging compliance option in §63.2240(c)	You submit with your Notification of Compliance Status documentation showing that the process exhausts controlled enter into the flame zone of your combustion unit.

(1), (6) and (8) not applicable to permittee

Attachment 6: 40 CFR 63, Subpart DDDD, Table 6

Table 6 to Subpart DDDD of Part 63—Initial Compliance Demonstrations for Work Practice Requirements

For each . . .	For the following work practice requirements . .	You have demonstrated initial compliance if . . .
(3) Softwood veneer dryer	Minimize fugitive emissions from the dryer doors and the green end	You meet the work practice requirement AND you submit with the Notification of Compliance Status a copy of your plan for minimizing fugitive emissions from the veneer dryer heated zones (as required in §63.2265).
(5) Group 1 miscellaneous coating operations	Use non-HAP coatings as defined in §63.2292	You meet the work practice requirement AND you submit a signed statement with the Notification of Compliance Status that you are using non-HAP coatings AND you have a record showing that you are using non-HAP coatings.

(1), (2) & (4) not applicable to permittee

Attachment 7: 40 CFR 63, Subpart DDDD, Table 7

Table 7 to Subpart DDDD of Part 63—Continuous Compliance With the Compliance Options and

For . . .	For the following compliance options and operating requirements . . .	You must demonstrate continuous compliance by . . .
(1) Each process unit listed in Table 1B to this subpart or used in calculation of an emissions average under §63.2240(c)	Compliance options in Table 1B to this subpart or the emissions averaging compliance option in §63.2240(c) and the operating requirements in Table 2 to this subpart based on monitoring of operating parameters	Collecting and recording the operating parameter monitoring system data listed in Table 2 to this subpart for the process unit according to §63.2269(a) through (b) and §63.2270; AND reducing the operating parameter monitoring system data to the specified averages in units of the applicable requirement according to calculations in §63.2270; AND maintaining the average operating parameter at or above the minimum, at or below the maximum, or within the range (whichever applies) established according to §63.2262.
(4) Each process unit using a catalytic oxidizer	Compliance options in Table 1B to this subpart or the emissions averaging compliance option in §63.2240(c)	Checking the activity level of a representative sample of the catalyst at least every 12 months and taking any necessary corrective action to ensure that the catalyst is performing within its design range.

(2), (3), (5) & (6) not applicable to permittee

Attachment 8: 40 CFR 63, Subpart DDDD, Tables 8 & 9

Table 8 to Subpart DDDD of Part 63—Continuous Compliance With the Work Practice Requirements

For	For the following work practice requirements	You must demonstrate continuous compliance by
(3) Softwood veneer dryer	Minimize fugitive emissions from the dryer doors and the green end	Following (and documenting that you are following) your plan for minimizing fugitive emissions.
(5) Group 1 miscellaneous coating operations	Use non-HAP coatings as defined in §63.2292	Continuing to use non-HAP coatings AND keeping records showing that you are using non-HAP coatings.

(1), (2) & (4) not applicable to the permittee

Table 9 to Subpart DDDD of Part 63 Requirements for Reports

You must submit a(n) . . .	The report must contain . . .	You must submit the report . . .
(1) Compliance report	The information in §63.2281(c) through (g)	Semiannually according to the requirements in §63.2281(b).
(2) immediate startup, shutdown, and malfunction report if you had a startup, shutdown, or malfunction during the reporting period that is not consistent with your SSMP	(i) Actions taken for the event	By fax or telephone within 2 working days after starting actions inconsistent with the plan.
	(ii) The information in §63.10(d)(5)(ii)	By letter within 7 working days after the end of the event unless you have made alternative arrangements with the permitting authority.

Attachment 9: 40 CFR 63, Subpart DDDD, Table 10

Table 10 to Subpart DDDD of Part 63—Applicability of General Provisions to Subpart DDDD			
Citation	Subject	Brief description	Applies to subpart DDDD
§63.1	Applicability	Initial applicability determination; applicability after standard established; permit requirements; extensions, notifications	Yes.
§63.2	Definitions	Definitions for part 63 standards	Yes.
§63.3	Units and Abbreviations	Units and abbreviations for part 63 standards	Yes.
§63.4	Prohibited Activities	Prohibited activities; compliance date; circumvention, fragmentation	Yes.
§63.5	Construction/Reconstruction	Applicability; applications; approvals	Yes.
§63.6(a)	Applicability	GP apply unless compliance extension; GP apply to area sources that become major	Yes.
§63.6(b)(1)–(4)	Compliance Dates for New and Reconstructed Sources	Standards apply at effective date; 3 years after effective date; upon startup; 10 years after construction or reconstruction commences for section 112(f)	Yes.
§63.6(b)(5)	Notification	Must notify if commenced construction or reconstruction after proposal	Yes.
§63.6(b)(6)	[Reserved]		
§63.6(b)(7)	Compliance Dates for New and Reconstructed Area Sources that Become Major	Area sources that become major must comply with major source standards immediately upon becoming major, regardless of whether required to comply when they were an area source	Yes.
§63.6(c)(1)–(2)	Compliance Dates for Existing Sources	Comply according to date in subpart, which must be no later than 3 years after effective date; for section 112(f) standards, comply within 90 days of effective date unless compliance extension	Yes.
§63.6(c)(3)–(4)	[Reserved]		
§63.6(c)(5)	Compliance Dates for Existing Area Sources that Become Major	Area sources that become major must comply with major source standards by date indicated in subpart or by equivalent time period (e.g., 3 years)	Yes.
§63.6(d)	[Reserved]		
§63.6(e)(1)–(2)	Operation & Maintenance	Operate to minimize emissions at all times; correct malfunctions as soon as practicable; operation and maintenance requirements independently enforceable; information Administrator will use to determine if operation and maintenance requirements were met	Yes.
§63.6(e)(3)	Startup, Shutdown, and Malfunction Plan (SSMP)	Requirement for SSM and SSMP; content of SSMP	Yes.
§63.6(f)(1)	Compliance Except During SSM	You must comply with emission standards at all times except during SSM	Yes.

*Note: §63.6(f)(1) was vacated by the Washington DC circuit Court of Appeals on December 19, 2008. The petitioners requested a rehearing on May 29, 2009.

Attachment 9: 40 CFR 63, Subpart DDDD, Table 10, continued

§63.6(f)(2)–(3)	Methods for Determining Compliance	Compliance based on performance test, operation and maintenance plans, records, inspection	Yes.
§63.6(g)(1)–(3)	Alternative Standard	Procedures for getting an alternative standard	Yes.
§63.6(h)(1)–(9)	Opacity/Visible Emission (VE) Standards	Requirements for opacity and visible emission standards	NA.
§63.6(i)(1)–(14)	Compliance Extension	Procedures and criteria for Administrator to grant compliance extension	Yes.
§63.6(i)(15)	[Reserved]		
§63.6(i)(16)	Compliance Extension	Compliance extension and Administrator's authority	Yes.
§63.6(j)	Presidential Compliance Exemption	President may exempt source category from requirement to comply with rule	Yes.
§63.7(a)(1)–(2)	Performance Test Dates	Dates for conducting initial performance testing and other compliance demonstrations; must conduct 180 days after first subject to rule	Yes.
§63.7(a)(3)	Section 114 Authority	Administrator may require a performance test under CAA section 114 at any time	Yes.
§63.7(b)(1)	Notification of Performance Test	Must notify Administrator 60 days before the test	Yes.
§63.7(b)(2)	Notification of Rescheduling	If have to reschedule performance test, must notify Administrator as soon as practicable	Yes.
§63.7(c)	Quality Assurance/Test Plan	Requirement to submit site-specific test plan 60 days before the test or on date Administrator agrees with; test plan approval procedures; performance audit requirements; internal and external QA procedures for testing	Yes.
§63.7(d)	Testing Facilities	Requirements for testing facilities	Yes.
§63.7(e)(1)	Conditions for Conducting Performance Tests	Performance tests must be conducted under representative conditions; cannot conduct performance tests during SSM; not a violation to exceed standard during SSM	Yes.
§63.7(e)(2)	Conditions for Conducting Performance Tests	Must conduct according to rule and EPA test methods unless Administrator approves alternative	Yes.
§63.7(e)(3)	Test Run Duration	Must have three test runs for at least the time specified in the relevant standard; compliance is based on arithmetic mean of three runs; specifies conditions when data from an additional test run can be used	Yes.
§63.7(f)	Alternative Test Method	Procedures by which Administrator can grant approval to use an alternative test method	Yes.
§63.7(g)	Performance Test Data Analysis	Must include raw data in performance test report; must submit performance test data 60 days after end of test with the notification of compliance status; keep data for 5 years	Yes.

Attachment 9: 40 CFR 63, Subpart DDDD, Table 10, continued

§63.7(h)	Waiver of Tests	Procedures for Administrator to waive performance test	Yes.
§63.8(a)(1)	Applicability of Monitoring Requirements	Subject to all monitoring requirements in standard	Yes.
§63.8(a)(2)	Performance Specifications	Performance specifications in appendix B of part 60 apply	Yes.
§63.8(a)(3)	[Reserved]		
§63.8(a)(4)	Monitoring with Flares	Requirements for flares in §63.11 apply	NA.
§63.8(b)(1)	Monitoring	Must conduct monitoring according to standard unless Administrator approves alternative	Yes.
§63.8(b)(2)–(3)	Multiple Effluents and Multiple Monitoring Systems	Specific requirements for installing monitoring systems; must install on each effluent before it is combined and before it is released to the atmosphere unless Administrator approves otherwise; if more than one monitoring system on an emission point, must report all monitoring system results, unless one monitoring system is a backup	Yes.
§63.8(c)(1)	Monitoring System Operation and Maintenance	Maintain monitoring system in a manner consistent with and good air pollution control practices	Yes.
§63.8(c)(1)(i)	Operation and Maintenance of CMS	Must maintain and operate CMS in accordance with §63.6(e)(1)	Yes.
§63.8(c)(1)(ii)	Spare Parts for CMS	Must maintain spare parts for routine CMS repairs	Yes.
§63.8(c)(1)(iii)	SSMP for CMS	Must develop and implement SSMP for CMS	Yes.
§63.8(c)(2)–(3)	Monitoring System Installation	Must install to get representative emission of parameter measurements; must verify operational status before or at performance test	Yes.
§63.8(c)(4)	Continuous Monitoring System (CMS) Requirements	CMS must be operating except during breakdown, out-of-control, repair, maintenance, and high-level calibration drifts; COMS must have a minimum of one cycle of sampling and analysis for each successive 10-second period and one cycle of data recording for each successive 6-minute period; CEMS must have a minimum of one cycle of operation for each successive 15 minute period	Yes.
§63.8(c)(5)	Continuous Opacity Monitoring System (COMS) Minimum Procedures	COMS minimum procedures	NA.
§63.8(c)(6)–(8)	CMS Requirements	Zero and high-level calibration check requirements; out-of-control periods	Yes.

Attachment 9: 40 CFR 63, Subpart DDDD, Table 10, continued

§63.8(d)	CMS Quality Control	Requirements for CMS quality control, including calibration, etc.; must keep quality control plan on record for 5 years. Keep old versions for 5 years after revisions	Yes.
§63.8(e)	CMS Performance Evaluation	Notification, performance evaluation test plan, reports	Yes.
§63.8(f)(1)–(5)	Alternative Monitoring Method	Procedures for Administrator to approve alternative monitoring	Yes.
§63.8(f)(6)	Alternative to Relative Accuracy Test	Procedures for Administrator to approve alternative relative accuracy tests for CEMS	Yes.
§63.8(g)	Data Reduction	COMS 6-minute averages calculated over at least 36 evenly spaced data points; CEMS 1 hour averages computed over at least 4 equally spaced data points; data that can't be used in average; rounding of data	Yes.
§63.9(a)	Notification Requirements	Applicability and State delegation	Yes.
§63.9(b)(1)–(2)	Initial Notifications	Submit notification 120 days after effective date; contents of notification	Yes.
§63.9(b)(3)	[Reserved]		
§63.9(b)(4)–(5)	Initial Notifications	Submit notification 120 days after effective date; notification of intent to construct/reconstruct; notification of commencement of construct/reconstruct; notification of startup; contents of each	Yes.
§63.9(c)	Request for Compliance Extension	Can request if cannot comply by date or if installed best available control technology/lowest achievable emission rate	Yes.
§63.9(d)	Notification of Special Compliance Requirements for New Source	For sources that commence construction between proposal and promulgation and want to comply 3 years after effective date	Yes.
§63.9(e)	Notification of Performance Test	Notify EPA Administrator 60 days prior	Yes.
§63.9(f)	Notification of Visible Emissions/Opacity Test	Notify EPA Administrator 30 days prior	No.
§63.9(g)	Additional Notifications When Using CMS	Notification of performance evaluation; notification using COMS data; notification that exceeded criterion for relative accuracy	Yes.
§63.9(h)(1)–(6)	Notification of Compliance Status	Contents; due 60 days after end of performance test or other compliance demonstration, except for opacity/VE, which are due 30 days after; when to submit to Federal vs. State authority	Yes.
§63.9(i)	Adjustment of Submittal Deadlines	Procedures for Administrator to approve change in when notifications must be submitted	Yes.

Attachment 9: 40 CFR 63, Subpart DDDD, Table 10, continued

§63.9(j)	Change in Previous Information	Must submit within 15 days after the change	Yes.
§63.10(a)	Recordkeeping/ Reporting	Applies to all, unless compliance extension; when to submit to Federal vs. State authority; procedures for owners of more than one source	Yes.
§63.10(b)(1)	Recordkeeping/ Reporting	General Requirements; keep all records readily available; keep for 5 years	Yes.
§63.10(b)(2)(i)–(iv)	Records Related to Startup, Shutdown, and Malfunction	Occurrence of each of operation (process equipment); occurrence of each malfunction of air pollution equipment; maintenance on air pollution control equipment; actions during startup, shutdown, and malfunction	Yes.
§63.10(b)(2)(vi) and (x)–(xi)	CMS Records	Malfunctions, inoperative, out-of-control	Yes.
§63.10(b)(2)(vii)–(ix)	Records	Measurements to demonstrate compliance with compliance options and operating requirements; performance test, performance evaluation, and visible emission observation results; measurements to determine conditions of performance tests and performance evaluations	Yes.
§63.10(b)(2)(xii)	Records	Records when under waiver	Yes.
§63.10(b)(2)(xiii)	Records	Records when using alternative to relative accuracy test	Yes.
§63.10(b)(2)(xiv)	Records	All documentation supporting initial notification and notification of compliance status	Yes.
§63.10(b)(3)	Records	Applicability determinations	Yes.
§63.10(c)(1)–(6), (9)–(15)	Records	Additional records for CMS	Yes.
§63.10(c)(7)–(8)	Records	Records of excess emissions and parameter monitoring exceedances for CMS	No.
§63.10(d)(1)	General Reporting Requirements	Requirement to report	Yes.
§63.10(d)(2)	Report of Performance Test Results	When to submit to Federal or State authority	Yes.
§63.10(d)(3)	Reporting Opacity or VE Observations	What to report and when	NA.
§63.10(d)(4)	Progress Reports	Must submit progress reports on schedule if under compliance extension	Yes.
§63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	Contents and submission	Yes.

Attachment 9: 40 CFR 63, Subpart DDDD, Table 10, continued

§63.10(e)(1)–(2)	Additional CMS Reports	Must report results for each CEM on a unit; written copy of performance evaluation; 3 copies of COMS performance evaluation	Yes.
§63.10(e)(3)	Reports	Excess emission reports	No.
§63.10(e)(4)	Reporting COMS data	Must submit COMS data with performance test data	NA.
§63.10(f)	Waiver for Recordkeeping/Reporting	Procedures for EPA Administrator to waive	Yes.
§63.11	Flares	Requirements for flares	NA.
§63.12	Delegation	State authority to enforce standards	Yes.
§63.13	Addresses	Addresses where reports, notifications, and requests are sent	Yes.
§63.14	Incorporation by Reference	Test methods incorporated by reference	Yes.
§63.15	Availability of Information	Public and confidential information	Yes

Attachment 10: MRRR 2M VE flowchart

