

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

IN THE MATTER OF THE COMPLIANCE BY ) AIR OPERATING PERMIT  
VAAGEN BROS. LUMBER COMPANY ) No. **NUMBER**  
COLVILLE, WA; LUMBER SAWMILL )  
565 West 5<sup>th</sup>, Colville Washington 99114 ) **DRAFT PERMIT**  
with Section 70.94.161 RCW, Operating Permits for )  
Air Contaminant Sources, and the applicable rules and )  
regulations of the Department of Ecology )

To: Vaagen Brothers Lumber Company  
565 West 5<sup>th</sup>  
Colville, Washington 99114

Issuance Date: DATE  
Effective Date: DATE  
Expiration Date: DATE

**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, Vaagen Brothers Lumber Company, Colville Sawmill is called the permittee. The permittee is required to comply with the provisions contained within this permit.

This Air Operating Permit, DATED at Spokane, Washington, this **X** Day of **MONTH**, 2019.

PREPARED BY:

REVIEWED BY:

\_\_\_\_\_  
Andy Kruse, P.E.  
Eastern Region Air Quality Section  
Department of Ecology  
State of Washington

\_\_\_\_\_  
David T. Knight, Section Manager  
Eastern Region Air Quality Section  
Department of Ecology  
State of Washington

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**LIST OF ABBREVIATIONS**

AOP	Air Operating Permit
BACT	Best Available Control Technology
BTU	British Thermal Units
°C	Degrees Celsius
CAM	Compliance Assurance Monitoring
CEM	Continuous Emissions Monitoring
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CEMS	Continuous Emission Monitoring System
COMS	Continuous Opacity Monitoring System
CMS	Continuous 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 <sup>3</sup>	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 <sub>2</sub>	Nitrogen gas
NOC	Notice of Construction
NO <sub>x</sub>	Oxides of Nitrogen
NSPS	New Source Performance Standard
O <sub>2</sub>	Oxygen
O&M	Operation & Maintenance
P.E.	Professional Engineer
PM	Particulate Matter
PM-10	Particulate Matter with aerodynamic diameter ≤ 10 micrometers
ppm	Parts per million
PSD	Prevention of Significant Deterioration
QIP	Quality Improvement Plan
RACT	Reasonably Available Control Technology
RCW	Revised Code of Washington
RM	EPA Reference Method from 40 CFR Part 60, Appendix A
SERP	Source Emission Reduction Plan
scfm	Standard Cubic Feet per Minute
SIP	State Implementation Plan
SOB	Statement of Basis
SO <sub>2</sub>	Sulfur Dioxide
TAP	Toxic Air Pollutant
TPY	Tons Per Year
TSP	Total Suspended Particulate
VOC	Volatile Organic Compound
WAC	Washington Administrative Code
yr	Year

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

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

U.S. EPA Region 10 Administrator  
Air Permits MS: OAQ-108  
1200 Sixth Avenue  
Seattle, Washington 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), 08/16/18], [WAC 173-401-640(1), 08/16/18]

**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), 08/16/18].

**1.3 Severability:** 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), 08/16/18], [RCW 70.94.905, 2018 (S)]

**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, 08/16/18]

**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), 08/16/18]

**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), 08/16/18]

**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), 11/04/93]

**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, P.O. Box 40903, Olympia, WA 98504-0903 and serving it on the

Department of Ecology, Appeals Coordinator, P.O. Box 47608, Olympia, WA 98504-7608. Send a copy of the appeal to the Department of Ecology, Air Quality Program, 4601 North Monroe, Spokane, WA 99205-1295 within thirty 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), 08/16/18]

**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), 08/16/18]

**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), 08/16/18; 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), 08/16/18], [Order No. 17AQ-E014, Issued 6/26/17, Approval condition 11.4], [Order No. DE98AQ-E132, Issued 9/18/98, Approval Condition 6.8], [Order No. 05AQ-E139, 2<sup>nd</sup> Amendment, issued 12/26/2006, Approval Condition 4.5], [Order No. 04AQ-E137, Issued 12/14/04, Approval Condition 6.5].

**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), 08/16/18], [WAC 173-401-510(2)(h)(iii)(B), 08/16/18]

**2.3. Permit Renewal and Expiration -** This permit is issued for a fixed term of 5 years. The permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application (as outlined in WAC 173-401-510) is submitted at least 12 months, but no greater than 18 months prior to the date of permit expiration. A complete renewal application is due no later than DATE. 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, 08/16/18; 173-401-705, 08/16/18; 173-401-710, 08/16/18]

**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), 08/16/18], [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), 08/16/18]

**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), 08/16/18], [WAC 173-401-930(3), 08/16/18], [Order No. 17AQ-E014, Issued 6/26/17, Approval condition 11.5], [Order No. DE98AQ-E132, Issued 9/18/98, Approval Condition 6.9], [RCW 70.94.162(1), 2018 (S)]

**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), 08/16/18], [WAC 173-400-105(2), (3), (4), 10/25/18 (S)], [RCW 70.94.200, 2018 (S)], [Order No. 17AQ-E014, Issued 6/26/17, Approval conditions 4.11 and 11.1], [Order No. DE98AQ-E132, Issued 9/18/98, Approval Conditions 5.6, 6.4], [Order No. 05AQ-E139, 2<sup>nd</sup> Amendment, issued 12/26/2006, Approval Condition 4.2], [Order No. 04AQ-E137, Issued 12/14/04, Approval Condition 6.2].

**2.8. Record Keeping:** 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:

- 2.8.1. The date, place, and time of the sampling or measurements.
- 2.8.2. The date(s) analyses were performed.
- 2.8.3. The company or entity that performed the analysis.
- 2.8.4. The analytical techniques or methods used.
- 2.8.5. The results of such analyses.
- 2.8.6. The operating conditions as existing at the time of sampling or measurement.

[WAC 173-401-615(2)(a), (c), 8/16/18], [Order No. DE98AQ-E132, Issued 9/18/98, Approval Condition 5.5]

## 2.9. Reporting

**2.9.1. Deviation Reports:** 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, the magnitude of the deviation in relation to the applicable limit, the probable cause of the deviation, and any corrective actions or preventive measures taken. Such deviations shall be reported to Ecology at the address included in this permit.

- 2.9.1.1. Deviations which represent a potential threat to human health or safety must be reported as soon as possible, but in no case later than twelve (12) hours after the deviation is discovered.
- 2.9.1.2. Excess emissions due to emergency (§2.10.1), or which the source believes unavoidable (§2.10.2) shall be reported within 2 working days of the event.
- 2.9.1.3. Other deviations shall be reported no later than thirty 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.

Responsible official certification of all monthly deviation reports submitted during the previous six month period shall be included in each semi-annual monitoring report. [WAC 173-401-615(3)(b), 8/16/18], [WAC 173-400-107, 6/2/95, 10/25/18(S)], [WAC 173-401-615(3)(a), 8/16/18], [40 CFR 60.49b(h), 7/1/18], [WAC 173-401-630(1), 8/16/18], [WAC 173-401-645, 8/16/18], [Order No. 17AQ-E014, Issued 6/26/17, Approval Condition 9.1].

**2.9.2. 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 6 months. Monitoring periods shall be January 1<sup>st</sup> — June 30<sup>th</sup>, and July 1<sup>st</sup> —December 31<sup>st</sup>. Semi-annual monitoring reports shall be due no later than 110 days following the end of each 6 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. The report must include CAM monitoring information specified in MRRR 11M (4)(a) & (b). All semi-annual monitoring reports must be certified by a responsible official consistent with Condition 2.9.3. [WAC 173-401-615(3)(a), 8/16/18]

**2.9.3. 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 110 days following the end of the certification period. Ecology may require that

compliance certifications be submitted more frequently for those emission units not in compliance with permit terms and conditions, or where more frequent certification is specified in the applicable requirement. [WAC 173-401-630(5)(a), 8/16/18], [WAC 173-401-630(1), 8/16/18]

2.9.3.1. The certification shall describe and include the following:

2.9.3.1.1. The permit term or condition that is the basis of the certification,

2.9.3.1.2. The current compliance status,

2.9.3.1.3. Whether compliance was continuous or intermittent, and

2.9.3.1.4. The methods used for determining compliance, currently and over the reporting period consistent with WAC 173-401-615(3)(a).

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

[WAC 173-401-630(5) (c), (d), 8/16/18]

2.9.3.3. 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), 8/16/18]

2.9.3.4. All compliance certifications shall include certification by a responsible official in accordance with Condition 2.9.5.

2.9.3.5. For the purpose of submitting compliance certifications, or establishing whether or not a person has violated or is in violation of any requirement of this permit, nothing in 40 CFR Part 60 or in the Washington State Implementation Plan 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), 7/1/18], [40 CFR 60.11(g), 7/1/18]

#### 2.9.4. **Emission Inventory:**

2.9.4.1. 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, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>x</sub>, CO, NO<sub>x</sub>, VOC, ammonia, lead and total TAPs, and shall be submitted no later than one hundred five days after the end of the calendar year.

2.9.4.2. Emissions shall be quantified by multiplying the appropriate operating parameter by an emission factor derived from the most recent source testing. If test-derived factors are unavailable, use the most recent emission factor published by USEPA. Alternative emission factors or emission estimation methods may be used if approved by Ecology. Emission factors and operating parameters shall be clearly identified.

2.9.4.3. The inventory for the 2019 calendar year shall include the information required in Table 2A of Appendix A to Subpart A, 40 CFR 51 (2/19/2015)<sup>1</sup>

2.9.4.4. The source shall maintain records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards. Emissions inventories shall be sent to Ecology at the address included in this permit.

2.9.5. **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 application form, report or compliance certification submitted to Ecology pursuant to this permit shall contain certification of truth, accuracy, and completeness by a responsible official. Where the permit requires reporting more frequently than once every six months the responsible official's certification need only be submitted together with the semi-annual monitoring report required by Condition 2.9.2. The certification must cover all required reporting since the date

<sup>1</sup> Attachment 1



of the last certification. 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, 8/16/18], [WAC 173-401-500(6), 8/16/18], [40 CFR 60.4(a), (b), 7/1/18]

## 2.10. **Excess emissions**

2.10.1. **Excess emissions due to emergency:** An emergency<sup>1</sup>, as defined in WAC 173-401-645(1), constitutes an affirmative defense to an action brought for non-compliance with a technology-based<sup>2</sup> emission limitation if the permittee demonstrates through properly signed, contemporaneous operating logs or other relevant evidence that:

2.10.1.1. An emergency occurred and that the permittee can identify the cause(s) of the emergency

2.10.1.2. The permitted facility was at the time being properly operated;

2.10.1.3. 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;

2.10.1.4. The permittee submitted notice of the emergency to Ecology within two (2) 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.

2.10.1.5. In any enforcement action, the permittee seeking to establish the occurrence of an emergency has the burden of proof. [WAC 173-401-645, 11/04/93]

2.10.2. **Unavoidable Excess Emissions:** Excess emissions determined to be unavoidable under the procedures and criteria in WAC 173-400-107 shall be excused and not subject to penalty.

2.10.2.1. 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 2.10.2.2, 2.10.2.3 or 2.10.2.4.

2.10.2.2. Excess emissions due to startup or shutdown conditions shall be considered unavoidable provided the source reports as required under Condition 2.9.1 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.

2.10.2.3. Excess emissions due to scheduled maintenance shall be considered unavoidable if the source reports as required under Condition 2.9.1 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.

2.10.2.4. Excess emissions due to upsets shall be considered unavoidable provided the source reports as required under Condition 2.9.1 and adequately demonstrates that:

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<sup>1</sup> 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 to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

<sup>2</sup> Technology-based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes.

2.10.2.4.1. The event was not caused by poor or inadequate design, operation, or maintenance and.

2.10.2.4.2. 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, 10/25/18(S)], [Order No. 17AQ-E014, Issued 6/26/17, Approval condition 9.1]

**2.11. Federal Chlorofluorocarbons (CFC) Requirements – Title VI of the FCAA**

2.11.1. **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.

2.11.1.1. Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156.

2.11.1.2. 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.

2.11.1.3. Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

2.11.1.4. 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.)

2.11.1.5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156.

2.11.1.6. 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.

2.11.1.7. Persons conducting maintenance, service, repair, or disposal of appliances must follow the prohibitions pursuant to 40 CFR 82.154.

2.11.1.8. 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.

2.11.2. 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.

2.11.3. 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.

2.11.4. 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, Subpart G, 7/1/18],  
[RCW 70.94.970, 2018 (S)], [RCW 70.94.980, 2018 c199 §603 (S)]

## 2.12. Insignificant Emission Units

- 2.12.1. Upon request from Ecology the permittee must provide documentation sufficient to enable the authority to determine that the emission unit or activity has been appropriately listed as insignificant.
- 2.12.2. 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)
- 2.12.3. 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.
- 2.12.4. 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), 8/16/18]

## 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 7 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;
    - 3.1.1.4.1. The written notification shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- 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, 8/16/18], [WAC 173-401-620(2)(g), 8/16/18], [WAC 173-401-200(30), 8/16/18]

**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, 8/16/18].

### **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 (3) or more years prior to the expiration date of this permit. Such a reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j).
  - 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.
- 3.3.3. Reopening shall not be initiated before a notice of intent to reopen is provided to the permittee by Ecology at least thirty (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, 8/16/18]

#### **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, or
  - 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 1.1 above. [WAC 173-401-720, 8/16/18]

#### 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, 10/25/18 (S)], [WAC 173-400-113, 10/25/18 (S)], [WAC 173-455-120, 10/25/18 (S)], [WAC 173-400-171, 10/25/18 (S)], [WAC 173-460, 5/20/09 (S)], [RCW 70.94.152, 2018 c199 (S)], [Order No. 17AQ-E014, Issued 6/26/17, Approval condition 1] [Order No. DE98AQ-E132, Issued 9/18/98, Approval Condition No. 1.1].

4.2. **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 prior to commencing construction.

[WAC 173-455-120, 10/25/18 (S)], [WAC 173-400-114, 10/25/18 (S)], [RCW 70.94.153, 2018 c 199 (S)], [Order No. DE98AQ-E132, Issued 9/18/98, Approval Condition No. 1.1], [Order No. 17AQ-E014, Issued 6/26/17, Approval Condition 1].

4.3. **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, 04/05/84], [WAC 173-400-075(1), 10/25/18 (S)]

4.4. **Source Testing:** The following notification and reporting conditions apply to all required source testing

4.4.1. **Notification:** The permittee shall provide at least 30 days of 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:

4.4.1.1. A test schedule;

4.4.1.2. Proposed test methods, including a request to deviate from any required test method

4.4.1.3. Operating conditions (production rates, equipment operating rates, etc.) during the test

4.4.1.4. 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

4.4.2. **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) or procedures in *Ecology Source Test Manual September 20, 2004* (available online at [http://www.ecy.wa.gov/programs/air/Source\\_Test/sourcetesthome.html](http://www.ecy.wa.gov/programs/air/Source_Test/sourcetesthome.html))

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.

- 4.4.3. **Test reports.** Unless otherwise specified, the permittee shall submit source test reports to Ecology within 60 days of test completion. Test reports shall include:
- 4.4.3.1. The date and time of the test.
  - 4.4.3.2. A description of the source, associated pollution control equipment and sampling locations.
  - 4.4.3.3. A description of the test methods and quality assurance procedures used.
  - 4.4.3.4. A summary of results in the same units and averaging periods as the applicable emission standard.
  - 4.4.3.5. Field data and sample calculations.
  - 4.4.3.6. The amount of fuel burned, raw materials processed and product produced during the test
  - 4.4.3.7. Source and control equipment operating parameters measured during the test.
- [WAC 173-401-630(1), 8/16/18], [WAC 173-400-105(4), 10/25/18], [Order No. DE98AQ-E132, Issued 9/18/98, Approval Conditions 5.6 & 5.7], [Order No. 17AQ-E014, Issued 6/26/17, Approval Conditions 4.4, 4.7, 4.11, 9.2]

## 5. APPLICABLE REQUIREMENTS

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Pursuant to Washington Administrative Code (WAC) 173-401 Vaagen Brothers Lumber is authorized to operate the Colville, Washington sawmill in accordance with the terms and conditions listed in this permit.. These processes are subject to the conditions included in Sections 5.1 through 5.6; to the Monitoring, Recordkeeping, and Reporting Requirements in Section 6, and to other terms and conditions specified in this permit<sup>1</sup>.

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), 8/16/18], [WAC 173-401-630(1), 8/16/18], [WAC 173-400-105(4), 10/25/18(S)]

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<sup>1</sup> The monitoring, recordkeeping and reporting requirements in Section 6 do not apply to insignificant emissions units or activities.

**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 5.6. Monitoring, recordkeeping and reporting requirements in this section do not apply to insignificant emission units.

**TABLE 2.1**

<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal/State = F) (State Only = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
5.1.1	WAC 173-400-040(1) and (1)(b) 10/6/16	F	Visible emissions (except those due to the presence of uncombined water) shall not exceed 20% opacity for more than 3 minutes in any one hour.	RM 9A	<b>3M</b>
	WAC 173-400-040(1) and (1)(b) 10/25/2018	S			
5.1.2	WAC 173-400-060 10/6/16	F	General process units are required to meet all applicable provisions of WAC 173-400-040 and emissions of particulate material from any operation shall not exceed 0.1 grain/dscf of exhaust gas	RM 5	<b>2M</b>
	WAC 173-400-060 10/25/18	S			
5.1.3	WAC 173-400-040(2) 10/25/18	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		<b>1M</b>
5.1.4	WAC 173-400-040(3)(a), (8)(a) 10/6/16	F	The source shall perform maintenance to minimize emissions and take reasonable precautions to prevent fugitive dust from becoming airborne		<b>2M, 4M</b>
	WAC 173-400-040(3)(a), (8)(a) 10/25/18	S			
5.1.5	WAC 173-400-040(3)(a), (8)(a) 10/25/18	S	Fugitive dust control measures shall be taken to prevent fugitive emissions		<b>2M, 4M</b>



<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal/State = F) (State Only = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
— Facility Wide, continued —					
5.1.6	WAC 173-400-040(4) 10/25/18	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		<b>1M</b>
5.1.7	WAC 173-400-040(5) 10/6/16	F	No person shall cause or permit the emission of any air contaminant if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business		<b>1M</b>
	WAC 173-400-040(5) 10/25/18	S			
5.1.8	WAC 173-400-040(7) 10/6/16	F	No person shall conceal or mask an emission of an air contaminant		<b>None</b>
	WAC 173-400-040(7) 10/25/18	S			
5.1.9	WAC 173-400-200(2) 10/3/2014	F	No source may use dispersion techniques or excess stack height to meet ambient air quality standards or PSD increment limitations		<b>None</b>
	WAC 173-400-200(2) 10/25/18	S			
5.1.10	WAC 173-400-205 6/2/95	F	Varying the rate of emission of a pollutant according to atmospheric conditions is prohibited, except as directed according to air pollution episode regulations		<b>None</b>
	WAC 173-400-205 10/25/18	S			
5.1.11	RCW 70.94.040 2018	S	Causing air pollution in violation of Chapter 70.94 RCW is unlawful		<b>None</b>

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal/State = F) (State Only = S)	Description	Testing	MRRR Reference
— Facility Wide, continued —					
5.1.12	Order No. DE 98AQ-E132, Issued 9/18/98 Approval Condition 6.2	F	Open burning is subject to restrictions		None
	Chapter 173-425 WAC – Restriction on Open Burning	F			
5.1.13	WAC 173-400-040, 1 <sup>st</sup> ¶ 10/6/16	F	All emissions units are required to use RACT		None
	WAC 173-400-040, 1 <sup>st</sup> ¶, 10/25/18 (RCW 70.94.154(1))	S			
5.1.14	WAC 173-400-040 (6, 1 <sup>st</sup> ¶), 10/6/16	F	SO <sub>2</sub> ≤ 1000 ppm, dry basis (corrected to 7% O <sub>2</sub> for combustion sources) for 60 consecutive minutes.	RM6	5M
	WAC 173-400-040 (6,1 <sup>st</sup> ¶), 10/25/18	S			

**5.2 Hogged Fuel Boiler (Boiler No. 2)**

**TABLE 2.2**

<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal/State = F) (State Only = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
5.2.1	Order No. 17AQ-E014, Issued 6/26/17 Approval Condition 2.2.1	S	Opacity as measured by the COMS shall not exceed 10% over an hourly average (10 consecutive 6-minute averages)		<b>8M</b>
5.2.2	Order No. 17AQ-E014, Issued 6/26/17 Approval Conditions 2.2.2,	S	Opacity as measured by the COMS shall not exceed 20% over a six minute average		<b>8M</b>
<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal/State = F) (State Only = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
5.2.3	Order No. 17AQ-E014, Issued 6/26/17 Approval Conditions 2.3.1,	S	Visible emissions from the ESP stack shall not exceed 20% opacity for more than 3 minutes in any one hour, as measured by Method 9A. Applies at all times, including during soot blowing and grate cleaning.	RM 9A	<b>3M</b>
5.2.4	Order No. 17AQ-E014, Issued 6/26/17 Approval Condition 2.3.2	S	Visible emissions from the ESP stack shall not exceed 20% during any six-minute averaging period, as measured by Method 9. Applicable at all times, including soot blowing and grate cleaning	RM 9	<b>3M</b>
5.2.5	WAC 173-400-050(1), 10/6/16 ..... WAC 173-400-050(1) 10/25/18	F ..... S	Combustion and incineration units must meet all applicable provisions of WAC 173-400-040 and emissions of particulate material shall not exceed 0.2 grain/dscf of exhaust gas	RM 5	<b>5M, 6M,8M, 9M, 11M</b>

5.2.6	Order No. 17AQ-E014, Issued 6/26/17 Approval Conditions 2.1	S	PM emissions shall be $\leq$ 0.030 grains per dry standard cubic foot (7% O <sub>2</sub> ) during all modes of boiler operation	RM 5	<b>6M, 9M,11M</b>
5.2.7	Order No. 17AQ-E014, Issued 6/26/17, Approval Condition 2.4 ..... Order No. DE 78-495 First Amendment Issued 04/20/79 Approval Condition 1	S  F	Filterable particulate matter (RM5 front-half only) emissions shall not exceed 50 tons/year	RM 5	<b>6M, 9M,11M</b>
<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal/State = F) (State Only = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
—Hog Fuel Boiler, continued—					
5.2.8	Order No. 17AQ-E014 Issued 6/26/17 Approval Condition 1 ..... Order No. DE 78-495 First Amendment Issued 04/20/79 Approval Condition 1	S  F	The boiler steam generation rate shall not exceed 60,000 pounds per hour (monthly average)		<b>9M</b>
5.2.9	Order No. 17AQ-E014 Issued 6/26/17 Approval Condition 10.1, 10.2	S	The electrostatic precipitator (ESP) shall be online with both fields operating at all times that the hogged fuel boiler (No. 2 boiler) is operated		<b>9M</b>
5.2.10	WAC 173-400-070(2)(b) 10/6/16 ..... WAC 173-400-070(2)(b) 10/25/18	F  S	All hogged fuel boilers shall utilize RACT and shall be operated and maintained to minimize emissions		<b>4M, 10M</b>
5.2.11	Order No. 17AQ-E014 Issued 6/26/17 Approval Conditions 6.1,	S	O&M manual shall be kept updated		<b>10M</b>

5.2.12	Order No. 17AQ-E014 Issued 6/26/17 Approval Condition 6.3	S	ESP Ash Handling and Disposal Plan shall be followed		<b>4M</b>
5.2.13	Order No. DE 78-495 Issued 11/20/78 Approval Condition 2	S	The permittee shall comply with the provisions of its SERP		<b>None</b>

<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal/State = F) (State Only = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
—Hog Fuel Boiler, continued—					
5.2.14	Order No. 17AQ-E014 Issued 6/26/17 Approval Condition 11.2	S	Legible copies of the Approval Order and O&M Manual shall be in the working vicinity and available to employees in direct operation of the No. 2 boiler		<b>None</b>
5.2.15	Order No. 17AQ-E014 Issued 6/26/17 Approval Condition 11.3	S	The boiler and associated equipment must be operated in compliance with the O&M manual and NOC application		<b>4M</b>
5.2.16	40 CFR 64.7(b), 7/1/18	F	The permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.		<b>7M</b>
5.2.17	40 CFR 63.7500 (a)(1); 63.7515 (d); 63.7540 (a)(10,12), 7/1/18	F	Boiler tune-up		<b>18M</b>
5.2.18	40 CFR 63.7540 (a)(10)(vi)(A)-(C), 7/1/18	F	Maintain on-site report		<b>18M</b>
5.2.19	40 CFR 63.7500 (a)(1), Table 2 (1) and (7); 63.7510 (a)(1), (c), (d), 7/1/18	F	Emission limits		<b>18M</b>
5.2.20	40 CFR 63.7510 (e); 63.7515 (a), 7/1/18	F	Performance testing for CO and PM every three years		<b>18M</b>
5.2.21	40 CFR 63.7545 (d), 7/1/18	F	Notification of intent		<b>18M</b>

5.2.22	40 CFR 63.7520 (a); Subpart A, 63.7 (c), 7/1/18	F	Site-specific stack test plan		<b>18M</b>
5.2.23	40 CFR 63.7525 (a), 7/1/18	F	The source shall maintain the required CEMS (install on November 3, 2014) in proper working order per the manufacturer's instructions.		<b>18M</b>
5.2.24	40 CFR 63.7515 (f), 7/1/18	F	Report performance test results		<b>18M</b>
5.2.25	40 CFR 63.7545 (e), 7/1/18	F	Notification of compliance status		<b>18M</b>
5.2.26	40 CFR 63.7500 (a)(2), 63.7540 (a), Table 4 (4)(a), 7/1/18	F	Maintain opacity to less than or equal to 10% on a daily block average basis		<b>3M</b>
5.2.27	40 CFR 63.7525 (a), Table 7 (4), 7/1/18	F	Operate an oxygen trim system with the oxygen level set no lower than the lowest hourly average oxygen concentration measured during the most recent CO performance test as the operating limit for oxygen according to Table 7 to this subpart		<b>18M</b>
5.2.28	40 CFR 63.7550 (b), 7/1/18	F	Semi-annual compliance reports		<b>18M</b>
5.2.29	40 CFR 63.6(e)(3), 7/1/18	F	Startup, Shutdown, and Malfunction Plan		<b>19M</b>

**5.3 Natural Gas Fired Boiler (No. 1 Boiler)**

**TABLE 2.3**

<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal/State = F) (State Only = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
5.3.1	Order No. DE 98AQ-E132 Issued 09/18/98 Approval Condition 2.3	F	Opacity shall be less than 10% over a six-minute time period	RM 9	<b>3M</b>
5.3.2	Order No. DE 98AQ-E132 Issued 09/18/98 Approval Condition 6.1	F	No visible emissions from the boiler shall be allowed beyond the property line	RM 9 RM 22	<b>2M</b>
5.3.3	Order No. DE 98AQ-E132 Issued 09/18/98 Approval Conditions 2.1	F	NO <sub>x</sub> emission concentrations shall not exceed 30 ppm, dry basis, standard conditions (68°F and 1 atm) @ 7% O <sub>2</sub>	RM 7 or combustion analyzer	<b>13M</b>
5.3.4	Order No. DE 98AQ-E132 Issued 09/18/98 Approval Condition 2.2	F	CO emission concentrations shall not exceed 100 ppm, dry basis, standard conditions (68°F and 1 atm) @ 7% O <sub>2</sub>	RM 10 or combustion analyzer	<b>13M</b>
5.3.5	Order No. DE 98AQ-E132 Issued 09/18/98 Approval Conditions 1.1	F	Annual consumption of natural gas shall not exceed 262.8 million cubic feet		<b>12M</b>
5.3.6	Order No. DE 98AQ-E132 Issued 09/18/98 Section 3. BACT and Section 4. T-BACT	F	The No. 1 boiler shall combust only natural gas and shall be operated using good combustion control and a low NO <sub>x</sub> burner		<b>None</b>

— Boiler #1, continued —					
<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal/State = F) (State Only = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
5.3.7	Order No. DE 98AQ-E132 Issued 09/18/98 Approval Condition 4	F	O&M Manual Required		<b>14M</b>
5.3.8	Order No. DE 98AQ-E132 Issued 09/18/98 Approval Condition 6.6	F	Legible copies of the Approval Order and O&M Manual shall be in the working vicinity and available to employees in direct operation of the No. 1 natural gas boiler		<b>none</b>
5.3.9	Order No. DE 98AQ-E132 Issued 09/18/98 Approval Condition 6.7	F	The boiler and associated equipment must be operated in a manner consistent with the O&M manual and NOC application		<b>4M, 14M</b>
5.3.10	Order No. DE 98AQ-E132 Issued 09/18/98 Approval Condition 6.3	F	Order No. DE 98AQ-E132 shall become void if operation of the facility is discontinued for 18 months		<b>none</b>
5.3.11	WAC 173-400-050(1), 10/6/16 ..... WAC 173-400-050(1) 10/25/18	F ..... S	Combustion and incineration units must meet all applicable provisions of WAC 173-400-040 and emissions of particulate material shall not exceed 0.2 grain/dscf of exhaust gas	RM 5	<b>1M, 3M, 5M, 13M</b>
5.3.12	40 CFR 63.6(e)(3), 7/1/18	F	Startup, Shutdown, and Malfunction Plan		<b>19M</b>



**5.4 Lumber Drying Kiln #4**

<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal/State = F) (State Only = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
5.4.1	Order No. 05AQ-E139 2 <sup>nd</sup> Amendment Issued 12/26/2006 Approval Conditions 1.1	F	Annual kiln #4 lumber throughput shall not exceed 50 million b.f.		<b>15M</b>
5.4.2	Order No. 05AQ-E139 2 <sup>nd</sup> Amendment Issued 12/26/2006 Approval Condition 1.2	F	Southern pine shall not be processed through kiln #4		<b>15M</b>
5.4.3	Order No. 05AQ-E139 2 <sup>nd</sup> Amendment Issued 12/26/2006 Approval Condition 4.3	F	Legible copies of Order No. 05AQ-E139 shall be available to employees in direct operation of the dry kiln		<b>None</b>
5.4.4	Order No. 05AQ-E139 2 <sup>nd</sup> Amendment Issued 12/26/2006 Approval Condition 4.4	F	Operation of all equipment shall be conducted in accordance with good air pollution control practices as well as all data and specifications submitted as part of the NOC application unless otherwise approved in writing by Ecology		<b>4M, 14M</b>

**5.5 Lumber Drying Kilns #5 and #6**

<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal/State = F) (State Only = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
5.5.1	Order No. 15AQ-E601 Issued 9/9/2015 Approval Conditions 2.1	F	Annual kiln #5 and #6 lumber throughput shall not exceed 90 million b.f.		<b>17M</b>
5.5.2	Order No. 15AQ-E601 Issued 9/9/2015 Approval Condition 2.2	F	Douglas Fir, Lodgepole Pine, and Hemlock shall only be processed through kiln #5 and #6		<b>17M</b>
5.5.3	Order No. 15AQ-E601 Issued 9/9/2015 Approval Condition 2.3	F	Dry bulb temperature shall not exceed 200°F		<b>17M</b>
5.5.4	Order No. 15AQ-E601 Issued 9/9/2015 Approval Condition 2.4	F	Dry kiln doors shall be kept closed at all times during active drying operations		<b>None</b>
5.5.5	Order No. 15AQ-E601 Issued 9/9/2015 Approval Condition 3.1	F	Visible emissions shall not exceed 5% opacity for more than 3-minutes in any one hour period.	RM 9	<b>17M</b>
5.5.6	Order No. 15AQ-E601 Issued 9/9/2015 Approval Condition 3.2	F	Particulate matter (PM) emissions from the kiln vents shall not exceed 0.1 grains per dry standard cubic feet (0.1 gr/dscf)		<b>17M</b>
5.5.7	Order No. 15AQ-E601 Issued 9/9/2015 Approval Condition 4	F	A site specific O&M manual for the two Wellons' kilns #5 and #6 shall be developed and followed. The O&M manual shall be reviewed annually and updated to reflect any modifications or changes		<b>17M</b>
5.5.8	Order No. 15AQ-E601 Issued 9/9/2015 Approval Condition 6.1	F	Excess emissions shall be reported to Ecology in accordance with Washington Administrative Code (WAC) 173-400-107 through 173-400-109		<b>None</b>

5.5.9	Order No. 15AQ-E601 Issued 9/9/2015 Approval Condition 7	F	Performance testing shall be performed at such times and frequencies as specified in this approval Order and at other times in accordance with WAC 173-400-105(4)	Various	<b>None</b>
5.5.10	Order No. 15AQ-E601 Issued 9/9/2015 Approval Condition 8.4	F	Legible copies of Order No. 15AQ-E601 shall be available to employees in direct operation of the dry kiln		<b>None</b>
5.5.11	Order No. 15AQ-E601 Issued 9/9/2015 Approval Condition 8.5	F	Operation of all equipment shall be conducted in accordance with good air pollution control practices as well as all data and specifications submitted as part of the NOC application unless otherwise approved in writing by Ecology		<b>4M</b>

**5.6 Planer Baghouse**

<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal/State = F) (State Only = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
5.6.1	Order No. 04AQ-E137 Issued 12/14/04 Approval Condition 1	S	The planer shall not be operated without the baghouse control system also operating		<b>16M</b>
5.6.2	Order No. 04AQ-E137 Issued 12/14/04 Approval Conditions 2.1	S	Visible emissions from the baghouse exhaust shall not exceed 5% over a six-minute average	RM9	<b>3M</b>
5.6.3	Order No. 04AQ-E137 Issued 12/14/04 Approval Conditions 2.2	S	The PM-10 emission concentration from the baghouse exhaust shall not exceed 0.005 gr/dscf of exhaust gas, one-hour average	RM5 RM202	<b>3M, 16M</b>
5.6.4	Order No. 04AQ-E137 Issued 12/14/04 Approval Condition 6.3.	S	Legible copies of Order No. 04AQ-E137 or AOP shall be available to employees in direct operation of the equipment, and be available for review upon request by Ecology		<b>none</b>
5.6.5	Order No. 04AQ-E137 Issued 12/14/04 Approval Condition 6.4.	S	Operation of all equipment shall be conducted in accordance with good air pollution control practices as well as all data and specifications submitted as part of the NOC application unless otherwise approved in writing by Ecology		<b>4M</b>

## 6. Monitoring, Recordkeeping, and Reporting Requirements (MRRR)

[WAC 173-401-630(1), 8/16/18], [WAC 173-401-615(1)(a), (b), 8/16/18]

### GENERAL

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

**1M.** The permittee shall maintain records of all complaints received. Ecology shall be notified within three (3) working days of receipt of any complaints. The permittee shall address and respond to all complaints within three (3) working days of receipt of the complaint. The recordkeeping shall include the following with regard to the complaint and 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, and
- 5) Corrective action taken.
- 6) The results of the corrective action shall be reported as part of the monthly deviation report.

[WAC 173-401-615(1)(b), 8/16/18] \*NOTE: this is a gap-filling MRRR

**2M** The following shall apply generally, facility wide:

- 1) Monitoring – At least weekly, as well as any time visible emissions are observed, the permittee shall perform opacity surveys of the facility during daylight hours. The surveys shall be conducted while the facility is in operation, and where the sun is not directly in the observer’s eyes. The survey shall include observation for any visible emissions, including fugitive emissions.
  - a) Observer certification for plume evaluation is not required, but the observer will be trained in the general procedures for determining the presence of visible emissions (i.e. effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, observer position relative to source and sun, and the presence of uncombined water).
  - b) The survey shall consist of a visual scan of the facility and the direct observation of each emission point or stack.
  - c) If visible emissions are observed, the permittee shall identify the source and verify that equipment is operating normally, and that reasonable precautions are being taken to control any fugitive dust. If equipment is not operating normally or reasonable precautions are not being taken to control fugitive dust, the permittee shall take prompt corrective action.
- 2) Recordkeeping: Records of each survey shall include the date, observer name, the weather, and identification of any points from which visible emissions were observed. The permittee shall record any action taken under a)(3), including a description any corrective action taken.
- 3) Reporting: Monthly deviation reports required by Standard Condition 2.9 shall include a description of any visible emissions, and any corrective action taken under 2M (1)(c).

[WAC 173-401-615(1), (2), 8/16/18] \*NOTE: this is a gap-filling MRRR

**3M.** The permittee shall monitor opacity in accordance with the following.

- 1) At least monthly, or whenever excess visible emissions are observed, 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. Each survey shall be performed as follows:
  - a) The survey shall be conducted during daylight hours from a location with a clear view of the emission point and where the sun is as close as possible to being directly behind the observer. The observer's location shall be at least 15 feet but not more than ¼ mile from the source.
  - b) The survey shall be conducted while the facility process associated with the emission point is in operation.
  - c) The observer will be trained in the general procedures for determining the presence of visible emissions (i.e. effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, observer position relative to source and sun, and the presence of uncombined water).
  - d) The survey shall consist of a minimum of a 15-second visual observation of each stack or emission point to identify any visible emissions other than those due to uncombined water.
  - e) Records shall be made of each observation, including at least: the emission points observed, the name of the observer, the date and time of the observation, the emission points observed, weather conditions and the presence or absence of visible emissions.
  - f) If visible emissions are observed to be zero, no further action is required.
  - g) If visible emissions are observed—as soon as possible, but no later than 24 hours after the observation, the permittee 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.
  - h) If any of the above are not being met, corrective action must be taken as soon as possible, but no later than 72 hours from the initial observation.
  - i) If or when 1(g)(i), (ii), and (iii) are being met:
    - i) If no visible emissions are observed, no further action is required.
    - ii) If visible emissions are observed, the permittee shall within 24 hours, perform an RM 9 or Ecology Method 9A (whichever is applicable) test on the source of the emissions. The test shall be performed only by personnel certified to perform RM9 in accordance with EPA guidelines. Testing shall consist of opacity readings at 15-second intervals over a minimum of six consecutive minutes (24 consecutive readings). If any reading exceeds the standard, observations shall continue for a total of 60 minutes or until a violation is documented
      - (a) If visible emissions do not exceed the applicable standard, no further action is required.
      - (b) If visible emissions exceed the applicable standard, the permittee shall initiate appropriate corrective action to address the problem and prevent further violations within 24 hours.

- (c) Once corrective action has been taken, the permittee shall perform, or have performed, an RM9 or Method 9A test to demonstrate a return to compliance. The results of the test shall be submitted to Ecology within two working days of the test.
- 2) Recordkeeping: the permittee shall maintain the following records for at least 5 years.
- a) A list of all facility personnel trained per 1(c), and a list of all facility personnel with current RM9 certification.
  - b) For each exceedance of the opacity standard identified under 1(i)(ii)(b) above:
    - ii) The date and time the exceedance was identified
    - iii) A description of the exceedance
    - iv) A description of corrective action taken
    - v) Copies of all RM9 or Method 9A observations documenting an exceedance or the re-establishment of normal operations.
- 3) **Reporting:** Reports of all opacity exceedances shall be included in the monthly deviation report required by Standard Condition 2.9.1.

[WAC 173-401-615(1)(b), & (3), 8/16/18], [WAC 173-401-630(1), 8/16/18]

\*NOTE: this MRRR includes gap-filling

#### **4M.**

- 1) At least once every twelve (12) months, the permittee shall perform a complete review of the Operation and Maintenance manuals, permit application materials (Notice of Construction) and other relevant documents (Fugitive Dust Control Plan, ESP Ash Handling Plan) for the referenced unit and associated equipment. The purpose of this review shall be to verify that the emission unit and associated equipment is being operated in accordance with the documents stated above and with good air pollution control practices in mind.
- 2) 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 30 days. All such discoveries shall be reported to Ecology as required by Standard Condition 2.9.1 of this permit.

[WAC 173-401-615(1)(b), (c), 8/16/18], [WAC 173-401-630(1), 8/16/18] \*NOTE: this MRRR includes gap-filling

- 5M.** The permittee shall determine the sulfur content of fuels used, except that no determination is needed for hog fuel<sup>1</sup>, natural gas, propane (LPG) or diesel fuel with less than 2% sulfur by weight. The permittee may rely on information from fuel suppliers or generally published information on the sulfur content of other fuels. Use of any fuel with sulfur content greater than 2% 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 2% by weight are combusted. The permittee may certify compliance with condition 5.3.11 if no fuel other than natural gas is combusted in boiler #1<sup>2</sup>.

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<sup>1</sup> "Hog fuel" means wood waste that is reduced in size to facilitate burning [WAC 173-300-020]. "Wood waste" means solid waste that consists of wood pieces or particles generated as a by-product or waste from the manufacturing of wood products, and the handling and storage of raw materials, trees, and stumps. This includes but is not limited to sawdust, chips, shavings, bark, pulp, and log sort yard waste, but does not include wood pieces or particles containing chemical preservatives such as creosote, pentachlorophenol, or copper-chrome-arsenate[WAC 173-300-020(29)].

<sup>2</sup> See discussion of 5M in Section **16** of Statement of Basis.

[WAC 173-401-615(1)(b), 8/16/18], [WAC 173-400-040(6), 10/25/18], [WAC 174-400-050(1), 10/25/18]. \*NOTE: this is a gap-filling MRRR

## **HOGGED FUEL BOILER (Boiler No. 2)**

**6M.** Periodic performance testing shall be conducted on the hogged fuel boiler at least once every five (5) years. The frequency of testing may be changed upon written request by the permittee and written approval from Ecology. The following conditions shall apply to all future testing.

1) Testing shall be conducted for the following pollutants:

- a) filterable (RM 5) and condensable (RM 202) particulate matter
- b) carbon monoxide (RM 10)
- c) Nitrogen oxides (RM 7).

Ecology may require testing for additional pollutants.

2) The testing shall consist of a minimum of three runs. One test run shall include soot blowing, one shall include grate cleaning, and two runs shall be conducted during normal operation. For purposes of evaluating compliance with the grain loading emission limit, the results from the four test runs shall be weight averaged according to the amount of time spent performing each function.

a) The minimum required hourly steam rate during source testing shall be calculated as follows:

- i) The minimum shall be 90% of the maximum design rated capacity of the boiler, or
- ii) The maximum achievable steam production rate. The maximum achievable steam production rate shall be calculated as the hourly average steam production rate during the week of highest total steam production rate in the last two years. If this approach is taken, documentation establishing the minimum required hourly steam rate for testing shall be included in the test plan.

b) All testing shall be reflective of normal source operation. The boiler shall be operated and controlled by the normal shift boiler operator during the period when the testers are on site and during actual testing. Any person, other than the boiler operator or boiler supervisor, including any consultant, boiler representative, or tester, directing the operation of the boiler in any way during the test period will immediately invalidate the testing for purposes of Ecology's evaluation. No controls or monitors other than those permanently installed and utilized during the normal course of operation will be used to direct operation of the boiler during the testing period.

c) Operating parameters including, but not limited to the following, shall be recorded at least once for each run of the source testing; stack exhaust temperature, steam production rate, primary and secondary ESP voltage and current, and multiclone differential pressure. The data collected shall be submitted as part of the test report. Continuous opacity monitor data recorded during the source test shall be included in the report.

d) Opacity observations using RM 9 shall be conducted for a minimum of a six minute observation to determine compliance. Observation may take one hour period or more during the source testing. A copy of the RM 9 test form shall be submitted as part of the test report.

e) Source test notification and reporting shall follow Standard Condition 4.4.

[Order No. 17AQ-E014, Issued 6/26/17, Approval Conditions 4, 4.1, 4.2, 4.5, 4.5.1, 4.5.3, 4.5.4, 4.12, 4.6, 4.7, 4.8, 4.9, 4.4, 4.11, 4.3, 5.1, 8.1.3, 9.2], [WAC 173-401-615(1)(b), 8/16/18], [WAC 173-401-630(1), 8/16/18], [WAC 173-400-105, 10/25/18] \*NOTE: this MRRR includes gap-filling

**7M.** Monitoring, Recordkeeping, and Reporting as required by 40 CFR 64 – CAM shall be subject to the following general conditions:

1) Monitoring Operation:



- a) 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.
  - b) Data recorded during monitoring malfunctions<sup>1</sup>, 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.
  - c) Proper maintenance: At all times, the permittee shall maintain the monitoring equipment, including maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b) 7/1/18]
  - d) Minimum data availability: The permittee shall recover valid monitoring data for at least 90% of the time the emission unit is required to be monitored each month.[40 CFR 64.6(c)(4) 7/1/18]
  - e) The permittee shall use all data collected during all other periods in assessing the operation of the control device and associated control system.[40 CFR 64.7(c) 7/1/18]
- 2) The Semi-Annual Monitoring Report required by Standard Condition 2.9.2 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 monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks), and
  - 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) 7/1/18]
- 3) The Annual Compliance Certification required by Standard Condition 2.9.3 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) 7/1/18]
- 4) 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 supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Records shall be maintained for a period of 5 years. [40 CFR 64.9(b)(1) 7/1/18]
  - 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), 7/1/18]

## 8M. Continuous Opacity Monitoring System

- 1) Monitoring – An opacity CEMS, which meets all provisions of the Environmental Protection Agency's 40 CFR 60, Appendix B, Performance Specification 1 shall be installed and operated. The opacity CEMS shall

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<sup>1</sup> 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.

be operated using quality assurance procedures conforming to EPA 340/1-86-010, Recommended Quality Assurance Procedures of Opacity CEMS.

- 2) 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 (5) years and shall be well organized and readily accessible for inspection by Ecology personnel:
  - a) A copy of the QA Plan,
  - b) Records of all quality assurance procedures performed for a period of five (5) years, and
  - c) Chart recorder readings or appropriate digital data from the COMS.
- 3) Reporting – Excess emission events shall be reported as required by Standard Condition 2.9.1 [Order No. 17AQ-E014, Issued 6/26/17, Approval Conditions, 3.2, 8.1.2, 8.1.5, 8.1.7, 9.1], [WAC 173-401-630(1), 8/16/18] \*NOTE: this MRRR includes gap-filling

**9M.** Hog fuel boiler monitoring, recordkeeping and reporting.

- 1) The following monitoring equipment shall be maintained in proper operating condition. The equipment shall be installed and operational at all times during boiler operation.
  - a) Equipment necessary to monitor steam generation rate.
  - b) Equipment to measure differential pressure on the multiclone (installed in accordance with CAM – 7M).
  - c) Continuous Opacity Monitoring System on the boiler exhaust stack.
  - d) Equipment to monitor primary and secondary voltage and primary and secondary current on each of the electrostatic precipitator transformer rectifier (T/R) sets.
  - e) All ESP monitoring equipment and instrumentation as described in the O&M manual.
- 2) The following recordkeeping specific to the hogged fuel boiler shall be retained for a period of five (5) years and kept in an organized, legible manner readily available for inspection by Ecology personnel.
  - a) Records of steam production. The permittee shall record the total monthly hours of operation and total monthly steam production of the hog fuel boiler.
  - b) ESP primary and secondary voltage and primary and secondary amperage for each T/R set shall be recorded at least once per 8-hour shift.
  - c) Maximum achievable steam rate production records.
  - d) Records of testing and inspections.
  - e) Records of deviation reports submitted in accordance with Standard Condition 9.1.
  - f) Chart recorder readings or computer file readings from the COMS.
  - g) O&M manual and maintenance records.
  - h) Regular maintenance and repair records.
- 3) Reporting:
  - a) All instances when the hog fuel boiler is operated without both fields of the ESP online shall be included in the monthly deviation report required by Standard Condition 9.1.
  - b) The annual emission inventory required by Standard Condition 9.4 shall include the number of hours and total steam production while operating the hog fuel boiler.

[Order No. 17AQ-E014, Issued 6/26/17, Approval Conditions 1, 3, 3.1, 3.2, 4.13, 5.2, 8.1.1, 8.1.3 through 8.1.6], [Order No. DE 78-495 First Amendment, Issued 04/20/79, Approval Condition 1], [WAC 173-401-630(1), 8/16/18], [WAC 173-401-615(1)(b), 8/16/18] \*NOTE: this MRRR includes gap-filling

**10M.** The permittee shall maintain and follow an O&M manual for the ESP controlling emissions from the hogged fuel boiler. The O&M manual shall be maintained in an up-to-date manner, well organized, and easily accessible for inspection by Ecology personnel. Emissions that result from failure to follow the requirements of the O&M manual or manufacturer's instruction may be considered proof that the equipment was not properly operated, maintained and monitored. The following minimum information shall be included in the manual:

- 1) Normal operating parameters, including baseline operating parameters as recorded during source testing.
- 2) A maintenance schedule,
- 3) A list of all monitoring and recordkeeping requirements,
- 4) A description of the monitoring procedures, and
- 5) A list of actions to be taken in response to abnormal operation.

[Order No. 17AQ-E014, Issued 6/26/17, Approval Conditions 6, 6.1, 6.1.1 through 6.1.5],

**11M.** The following shall function as Compliance Assurance Monitoring for the hogged fuel boiler.

- 1) The permittee shall install and operate the following:
  - a) Equipment shall be provided that monitors and displays electrostatic precipitator secondary voltage in kilovolts for both transformer/rectifier sets (T/R 1 and T/R 2).
  - b) Equipment to monitor differential pressure across the multiclone. The instrumentation shall display the differential pressure in inches of water column.
- 2) The permittee shall conduct monitoring as follows:
  - a) At least once per day, the permittee shall evaluate the data obtained through recordkeeping as described in i) and ii) below, answer the following questions and take the actions specified:
    - i) Has the daily average secondary voltage been below either of the following trigger limits for two (2) consecutive days?
      - (1) For T/R 1—20 kV.
      - (2) For T/R 2—30 kV.
    - ii) Has the daily average secondary voltage been below either of the following trigger limits for two (2) consecutive days?
      - (1) For T/R 1 —20 kV.
      - (2) For T/R 2—20 kV.
    - iii) Is the two-day average multiclone differential pressure greater than 4" w.c. or less than 1" w.c.?
  - b) If the answer to all three (3) questions posed under a) above is "no", corrective action is not required under CAM.
  - c) If the answer to the question posed by 2(a)(i) above is "yes", actions consistent with the following shall be taken.
    - i) ESP operation will be monitored more closely by facility personnel.

- ii) Facility personnel will immediately initiate actions to ensure proper operation of the rapping, purge air and insulator cleaning systems, and the multiclone, as well as other actions as deemed appropriate.
  - iii) In the event that the daily average ESP secondary voltages remain below the values established in 2(a)(i), for seven (7) consecutive days despite the actions taken, actions as outlined under 2(d)(i) shall be taken.
- d) If the answer to the question posed by 2(a)(ii) above is “yes”, actions consistent with the following shall be taken.
- i) As soon as possible, but no later than four (4) hours after discovery of the deviation, the permittee shall initiate corrective actions that are designed to return the equipment to normal operation as soon as possible and to prevent the likely recurrence of the cause of the deviation.  
  
Corrective action taken may include, but will not be limited to, checking rappers and vibrators for proper operation, checking multiclone and rotary screen for possible problems, checking bottom hoppers for buildup, checking ESP electrical systems, increasing the sonic blowdown, turning on the bottom vibrator, dumping the T/R set for an appropriate amount of time, obtaining manufacturer advice, and system shutdown and internal inspection along with appropriate subsequent maintenance and/or repair.
- e) If the answer to the question posed by 2(a)(iii) above is “yes”, the multiclone shall be internally inspected during the next scheduled plant shutdown, and corrective actions shall be taken as necessary to return the equipment to normal operation.
- 3) The permittee shall conduct recordkeeping in accordance with the following.
- a) At least once every eight (8) hours, the permittee shall record the values for ESP secondary voltage for both T/R 1 and T/R 2 and multiclone differential pressure. In recording ESP secondary voltage, facility personnel should watch the meter for approximately one minute, and record the highest observed value. The purpose of this is to avoid recording the voltage immediately after the ESP sparks.
  - b) At least once per day, the daily average of the secondary voltage for each of the T/R sets and the differential pressure across the multiclone shall be calculated by computing the mean of the three (3) recorded values.
  - c) In the event that actions as outlined in either 2(c), 2(d) or 2(e) are required, the permittee shall maintain records documenting the action taken, and the results of such action. The records shall be retained in a well-organized manner and easily accessible for inspection by Ecology personnel.
- 4) The permittee shall conduct reporting in accordance with the following.
- a) In the event that corrective action as outlined under 1(d) above is required, the permittee shall submit a report as part of, or attached to, the monthly deviation report as described in Standard Condition 2.9.1. The report shall include the appropriate data as recorded documenting the date, time and duration of the deviation, the magnitude of the deviation, an estimate of the excess emissions (if any), a description of the corrective action(s) taken, and the results of the corrective action. In the event that corrective action as outlined under 1(e) is required, the permittee shall notify Ecology of the next expected plant shutdown date, and shall submit a report following shutdown outlining the corrective actions taken.
  - b) Upon discovery that the monitoring as designed is insufficient to provide indications of all deviations, the permittee shall notify Ecology of the monitoring deficiency.  
[40 CFR 64.3, 64.4(d), 64.7(d), 64.7(e), 64.8, 7/1/18]

**Natural Gas Fired Boiler (No. 1 Boiler)**

**12M.** The following conditions shall apply to the monitoring, recordkeeping, and reporting required for the natural gas fired boiler.

- 1) All monitoring equipment and instrumentation as described in the O&M manual shall be installed and operational at all times during boiler operation.
- 2) The following recordkeeping specific to the natural gas fired boiler shall be retained for a period of five (5) years and kept in an organized, legible manner readily available for inspection by Ecology personnel.
  - a) Records of natural gas consumption.
  - b) Records of testing and inspections.
  - c) Records of deviation reports submitted in accordance with Standard Condition 1.13.1.
  - d) O&M manual.
  - e) Regular maintenance records.

[Order No. DE 98AQ-E132, Issued 09/18/98, Approval Conditions 1, 1.1, 3, 4, 5.5]

**13M.** Periodic performance testing shall be conducted on the natural gas fired boiler as follows. Testing shall be conducted at least once every 10 years, or within one year following the date that boiler natural gas usage exceeds 131.4 million cubic feet (50% of the annual permitted maximum amount). Testing shall not be required more often than once every five years unless any emission limit is exceeded during testing. The following conditions shall apply to all future testing.

- 1) Testing shall be conducted for the following pollutants unless otherwise approved by Ecology in writing. Ecology may require testing for additional pollutants as is deemed necessary. Testing for all pollutants shall be performed using one of the following two methods:
  - a) Emission testing using the appropriate EPA reference test methods from 40 CFR 60, Appendix A and 40 CFR 51, Appendix M. Pollutants tested shall be carbon monoxide (RM 10) and nitrogen oxides (RM 7), or
  - b) Emission testing using a combustion analyzer or equivalent for CO and NO<sub>x</sub>.
- 2) The testing shall consist of a minimum of three (3) runs operating at a minimum of 90% of rated design capacity. All runs shall be conducted during normal operation.
- 3) The boiler shall be operated and controlled by the normal shift boiler operator during the period when the testers are on site and during actual testing. Any person, other than the boiler operator or boiler supervisor, including any consultant, boiler representative, or tester, directing the operation of the boiler in any way during the test period will immediately invalidate the testing for purposes of Ecology's evaluation. No controls or monitors other than those permanently installed and utilized during the normal course of operation will be used to direct operation of the boiler during the testing period.
- 4) Source test notification and reporting shall follow Standard Condition 4.4.
- 5) Opacity observations using RM 9 may be conducted by Ecology during performance testing or compliance inspections.
- 6) The owner or operator of an affected source subject to the provisions of this part [40 CFR 63] shall maintain relevant records for such source including all documentation supporting initial notifications and notifications of compliance status under §63.9.

[Order No. DE 98AQ-E132, Iss. 09/18/98, Approval Conditions 2.2, 5.2, 5.3, 5.4, 5.7; 40 CFR 63, 7/1/18]

**14M.** The permittee shall maintain and follow an O&M manual for the natural gas fired boiler. Manufacturer's instructions may be referenced. The O&M manual shall be maintained in an up-to-date manner, well organized, and easily accessible for inspection by Ecology personnel. Emissions that result from failure to follow the requirements of the O&M manual or manufacturer's instructions may be considered proof

that the equipment was not properly operated, maintained and tested. The following minimum information shall be included in the manual:

- 1) Normal operating parameters for the unit,
- 2) A maintenance schedule for the unit,
- 3) A list of all monitoring and recordkeeping requirements,
- 4) A description of the monitoring procedures, and
- 5) A list of actions to be taken in response to abnormal control system operation.  
[Order No. DE 98AQ-E132, Issued 09/18/98, Approval Conditions 4, 4.1, 4.2, 4.3, 4.4, 4.5]

#### **Dry Kiln #4**

**15M** Records for dry kiln #4 shall be retained for at least five years, kept up-to-date, well organized and easily accessible to Ecology personnel upon request. Records shall include annual lumber throughput by species as well as total kiln #4 throughput.

[Order No. 05AQ-E139 2<sup>nd</sup> Amendment, Issued 12/26/2006, Approval Conditions.2, 2.1, 2.2]

#### **Planer**

**16M** The following conditions shall apply to monitoring, recordkeeping and reporting required for the new planer.

- 1) **Monitoring:** A gauge to monitor the pressure difference across the baghouse filter shall be installed and maintained. The gauge shall include an easily accessible display of the pressure drop in inches of water column.
- 2) **Recordkeeping:** the following recordkeeping for the new planer shall be retained for at least five years, kept up-to-date, well organized and easily available upon request by Ecology personnel:
  - a) Manufacturer's equipment specifications and unit identification for the planer and baghouse,
  - b) The pressure drop (inches water column) across the baghouse shall be recorded daily.
  - c) Total annual lumber throughput.
- 3) **Reporting:** All instances when the planer is operated without the planer baghouse operating shall be included in the monthly deviation report required by Standard Condition 2.9.1.  
[Order No. 04AQ-E137, Issued 12/14/04, Approval Conditions 3, 4.1, 4.2, 4.3, 5]

#### **Dry Kiln #5 and #6**

##### **17M**

1. Required records shall be available for inspection by Ecology upon request, kept in an organized and readily accessible manner and cover a minimum of the most recent 60-month period. With the exception of data recorded by an automated data acquisition system, each record required by this Order shall include the date and name of person making the record entry. If a control device or process is not operating during a specific time period, a record shall be made to that effect. The following records shall be kept:
  - a) The date(s) each load is being dried, amount of each load (in board feet), and lumber species of each load dried in each kiln.
  - b) Monthly records of total amounts dried (in board feet) and lumber species dried in each kiln.
  - c) Average dry bulb temperature for each load dried in each kiln.
  - d) Monthly and annual records of the total amount of lumber dried (both kilns combined).
  - e) Any performance testing results.
  - f) O&M manual and maintenance records.

[Order No. 15AQ-E601, Issued 9/9/2015, Approval Conditions 5]

2. Performance testing shall be performed at such times and frequencies as specified in this approval Order and at other times in accordance with WAC 173-400-105(4). Any changes to a required test frequency must be requested by the permittee and approved by Ecology in writing.
3. Test Methods: The sampling methods identified below shall be used:
  - a) Exhaust Flow: EPA Methods 1-4
  - b) Volatile Organic Compounds: EPA Method 25A or 18 or 320
  - c) Methanol: NCASI Method 105
  - d) Ethanol: NCASI Method 105
  - e) Formaldehyde: NCASI Method 105
  - f) Acetaldehyde: NCASI Method 105
  - g) Acrolein: NCASI Method 105
  - h) Propionaldehyde: NCASI Method 105
  - i) Acetic Acid: EPA Method 18
  - j) Monoterpenes: EPA Method 18
  - k) Particulate Matter: EPA Methods 5/202
4. Test Duration: The test duration shall be as necessary to yield representative results. In some cases, multiple test runs will be conducted over the drying cycle.
5. A written test protocol, including a description of the equipment to be tested, the process and control device operating information to be collected, and the sampling and analytical method(s) proposed, shall be submitted to Ecology at least 30-calendar days prior to the start of any performance test.
6. Test results shall be submitted to Ecology within 60-days of the last day of testing.
7. During testing, the process shall be operated at a minimum of ninety percent (90%) of rated capacity for equipment. Operation of the process during testing outside of the specified range may be proposed, but may result in an operational restriction.
8. Plant process equipment shall be operated and controlled by normal plant operators during the period when the performance testers are on-site to conduct testing and during actual testing.
9. The permittee shall provide testing and sampling facilities in accordance with the requirements in 40 CFR 60.8(e).
10. If the permittee is unable to conduct any performance test as scheduled, Ecology shall be notified at least 24-hours before the test.
11. The following Quality Assurance Measures shall be utilized unless otherwise approved by Ecology in advance of the testing:
  - a) The lumber used for the source test shall be preserved in a manner to assure the freshness of the lumber. The lumber shall be wrapped in plastic or other material to prevent off-gassing or contamination during storage.
  - b) The logs from which lumber for the testing is taken shall be newly arrived at the drying site.
  - c) The lumber shall be maintained below 45°F if the lumber is stored for more than two but less than 7 days prior to the commencement of testing.
  - d) The lumber shall be maintained below 10°F if stored for seven or more days prior to testing.
  - e) The ends of each test board shall be trimmed prior to testing.
  - f) The kiln shall be operated as close as practical to the dominant drying schedule (dry bulb and wet bulb temperatures) at the facility for the wood species being tested.
  - g) The wood samples shall be dried to a moisture content at or below the moisture content targeted by the subject facility.
12. Operating Parameters during Testing. All recorded production and operating parameters shall be documented in the test results report. The following operating and production parameters, at a minimum, shall be recorded during emission testing:
  - a) Test kiln details including: kiln dimensions, kiln air velocity, and heating method.

- b) Sample size (board feet), sample initial weight, and lumber dimensions (e.g. 2X4, 4X8, ...)
  - c) Drying time.
  - d) Wood moisture content (initial and final)
  - e) Temperature (continuously monitored and recorded wet bulb and dry bulb temperatures).
  - f) Lumber information including: percentage of heartwood vs. sapwood, ring count, percentage of face area that consists of knots, etc.
  - g) Tree information: coastal or inland, age, approximate date harvested, if log was stored in water.
  - h) Any interruptions in kiln operation.
- [17M, 2-12 = Order No. 15AQ-E601, Issued 9/9/2015, Approval Conditions 7.1 – 7.11]

## Boiler MACT Standards

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**18M.** The following conditions shall apply to the Hogged-Fuel Boiler per 40 CFR, Subpart DDDDD

- 1) The source shall perform the next required tune-up no later than November 4, 2019. The tune-up shall be performed every five years after that point in time [40 CFR 63.7540, 7/1/18]. Tune-up criteria can be found under 40 CFR 63.7540.
- 2) Source shall maintain on-site a report containing applicable information from tune-ups performed annually (if needed) and every five years [40 CFR 63.7540 (a)(10)(vi)(A)-(C), 7/1/18]. Report to contain:
  - a) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;
  - b) A description of any corrective actions taken as a part of the tune-up; and
  - c) The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.
  - d) The source shall submit the 5-year compliance report by April 15 following the completion of the compliance evaluation.
- 3) Demonstrate compliance through source testing [40 CFR 63.7510, 7/1/18]. Initial compliance requirements include:
  - a) Conduct performance tests according to §63.7520 and Table 5 to Subpart DDDDD.
  - b) Conduct a fuel analysis for each type of fuel burned in your boiler or process heater according to §63.7521 and Table 6 to Subpart DDDDD, except as specified in paragraphs (a)(2)(i) through (iii) of Subpart DDDDD.
  - c) Establish operating limits according to §63.7530 and Table 7 to Subpart DDDDD.
  - d) Conduct CMS performance evaluations according to §63.7525.
- 4) Performance testing for CO and PM may be performed every three years since the results from the Dec 2015 and Nov 2014 tests were less than 75% of limits. This testing interval may remain in effect as long as there are no changes in the operation of the individual boiler or air pollution control equipment that could increase emissions. This testing interval is based on the federal requirements [40 CFR 63.7515].
- 5) The source shall submit a notification to the Administrator of intent at least 60 days prior to each performance [40 CFR 63.7545, 7/1/18].
- 6) The source must develop a site-specific stack test plan (according to the requirements in 40 CFR 63.7(c)) and submit for approval upon request [40 CFR 63.7520, 7/1/18].



- 7) The source shall maintain the required CEMS (install on November 3, 2014) in proper working order per the manufacturer's instructions. [40 CFR 63.7525, 7/1/18]
- 8) The source shall submit the performance test results to the Administrator within 60 days after the completion of the performance tests [40 CFR 63.7515(f), 7/1/18]. This report must also verify that the operating limits for each boiler have not changed or provide documentation of revised operating limits established according to §63.7530 and Table 7 to Subpart DDDDD, as applicable.
- 9) The source shall submit a notification of compliance status, including all of the performance test results, before the close of business on the 60<sup>th</sup> day following the performance test and/or initial compliance demonstration [40 CFR 63.7545(e), 7/1/18]. The Notification of Compliance Status report must contain all the information specified in paragraphs (e)(1) through (8) of Subpart DDDDD (40 CFR 63.7545), as applicable.
- 10) The source shall maintain opacity to less than or equal to 10% on a daily block average basis [40 CFR 63.7500, Table 4(4)(a), 7/1/18].
- 11) The source shall operate an oxygen trim system with the oxygen level set no lower than the lowest hourly average oxygen concentration measured during the most recent CO performance test as the operating limit for oxygen according to Table 7 to Subpart DDDDD [40 CFR Subpart DDDDD Table 7(4)(c), 7/1/18].
- 12) The source shall submit semi-annual compliance reports per 40 CFR 63.7550(b)(2) to the Administrator. The semi-annual periods of Jan. 1 – June 30 are due no later than July 31; July 1 – Dec 31 are due no later than January 31.
- 13) For a minimum of 5 years after a performance test is conducted, the owner or operator shall retain and make available, upon request, for inspection by the Administrator the records or results of such performance test needed to determine emissions from an affected source. [40 CFR 63.7(g)(3), 7/1/18]
- 14) The owner or operator of an affected source subject to the provisions of 40 CFR 63.10(b)(1) shall maintain files of all information (including all reports and notifications) required by this part recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche. [40 CFR 63.10(b)(1), 7/1/18]

### **Boilers – Startup, Shutdown, and Malfunction Plan**

**19M** – The following conditions shall apply to the Facility per 40 CFR, 63.6(e)(3)

- 1) All information necessary, including actions taken, to demonstrate conformance with the affected source's startup, shutdown, and malfunction plan when all actions taken during periods of startup or shutdown (and the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards), and malfunction (including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. (The information needed to demonstrate conformance with the startup, shutdown, and malfunction plan may be recorded using a "checklist," or some other effective form of recordkeeping, in order to minimize the recordkeeping burden for conforming events);
  - a) The owner or operator of an affected source must develop a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction; and a program of corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with the relevant standard. The startup, shutdown, and malfunction plan does not need to address any scenario that would not cause the source to

exceed an applicable emission limitation in the relevant standard. This plan must be developed by the owner or operator by the source's compliance date for that relevant standard.

## **7. Permit Shield**

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**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.

**7.3 Exclusions.** Nothing in this section or in any chapter 401 permit shall alter or affect the following:

- (a) The provisions of section 303 of the FCAA (emergency orders), including the authority of the administrator under that section;
- (b) 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;
- (c) The applicable requirements of the acid rain program, consistent with section 408(a) of the FCAA;
- (d) The ability of EPA to obtain information from a source pursuant to section 114 of the FCAA; or
- (e) The ability of the permitting authority 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, 8/16/18]

**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. 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, is not in a nonattainment area.), or requirements which apply only to regulatory agencies are not included.

<b>Emission Unit or Activity</b>	<b>Requirement</b>	<b>Description</b>	<b>Basis of non-applicability</b>
Hog fuel boiler	40 CFR 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	The boiler was not constructed, modified or reconstructed after June 9, 1989
Hog fuel boiler	40 CFR 63, Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters	The plant is not a major source of HAP, as defined in 40 CFR 63.2, and Subpart DDDDD was vacated by the United States Court of Appeals.
Hog 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 was constructed before November 30, 1999 and has not been modified or reconstructed.
Natural gas boiler	40 CFR 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	The No. 1 boiler was converted from hog fuel to natural gas fuel in 1998. As part of the 1997 stipulation and settlement agreement between Ecology and the permittee it was agreed that the conversion would not constitute a modification with respect to subpart Dc, because it would result in a net criteria pollutant emission decrease.
Natural gas boiler	40 CFR 64	Compliance Assurance Monitoring (CAM)	Potential emissions of criteria pollutants are less than 100 tons.
Hog fuel boiler	WAC 173-434	Solid waste incinerator facilities	"Incinerator" means an enclosed mechanical combustion device that has as its primary purpose the burning and reduction of the volume of solid waste or solid waste-derived fuel.

Emission Unit or Activity	Requirement	Description	Basis of non-applicability
Hog Fuel Boiler	40 CFR 60, Subpart E	Standards of Performance for Incinerators	“Incinerator” means any furnace used in the process of burning solid waste for the purpose of reducing the volume of the waste by removing combustible matter.
Hog fuel boiler	40 CFR 60, Subpart EEEE	Standards of Performance for Other Solid Waste Incineration Units for Which Construction is Commenced After December 9, 2004, or for Which Modification or Reconstruction is commenced on or After June 16, 2006	The hog fuel boiler does not meet the applicability criteria in 40 CFR 60.2885.
Hog fuel boiler	40 CFR 64	Compliance Assurance Monitoring (CAM) for CO emissions.	The hog fuel boiler does not use a CO control device and is not subject to a CO emission limitation.
Hog fuel boiler	40 CFR 64	Compliance Assurance Monitoring (CAM) for NOx	The hog fuel boiler does not use a NOx control device and is not subject to a NOx emission limitation.
Facility	WAC-173-401-650	Operational Flexibility	Applies only to alternative operating scenarios. The permittee did not request any alternative operating scenarios.
Facility	40 CFR 61	National Emission Standards for Hazardous Air Pollutants	The facility is not in one of the categories listed in Subparts B through FF.
Facility	40 CFR 63, Subpart A, Section 63.2	National Emission Standards for Hazardous Air Pollutants for Source Categories – General Provisions	The potential to emit for all hazardous air pollutants is 21.5 tons - less than the major source threshold of 25 tons. The potential to emit of any hazardous air pollutant is 4.5 tons (methanol) - less than the major source threshold of 10 tons per year.

Attachment 1.  
Required data elements for 2015 emission inventory

TABLE 1 TO APPENDIX A OF SUBPART A—EMISSION THRESHOLDS<sup>1</sup> BY POLLUTANT FOR TREATMENT AS POINT SOURCE UNDER 40 CFR 51.30

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

<sup>1</sup> 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.

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

<sup>3</sup> NAA = Nonattainment Area. The point source reporting thresholds vary by attainment status for VOC, CO, and PM<sub>10</sub>.

<sup>4</sup> NH<sub>3</sub> threshold applies only in areas where ammonia emissions are a factor in determining whether a source is a major source, *i.e.*, where ammonia is considered a significant precursor of PM<sub>2.5</sub>.

TABLE 2a TO APPENDIX A OF SUBPART A—FACILITY INVENTORY<sup>1</sup> 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.

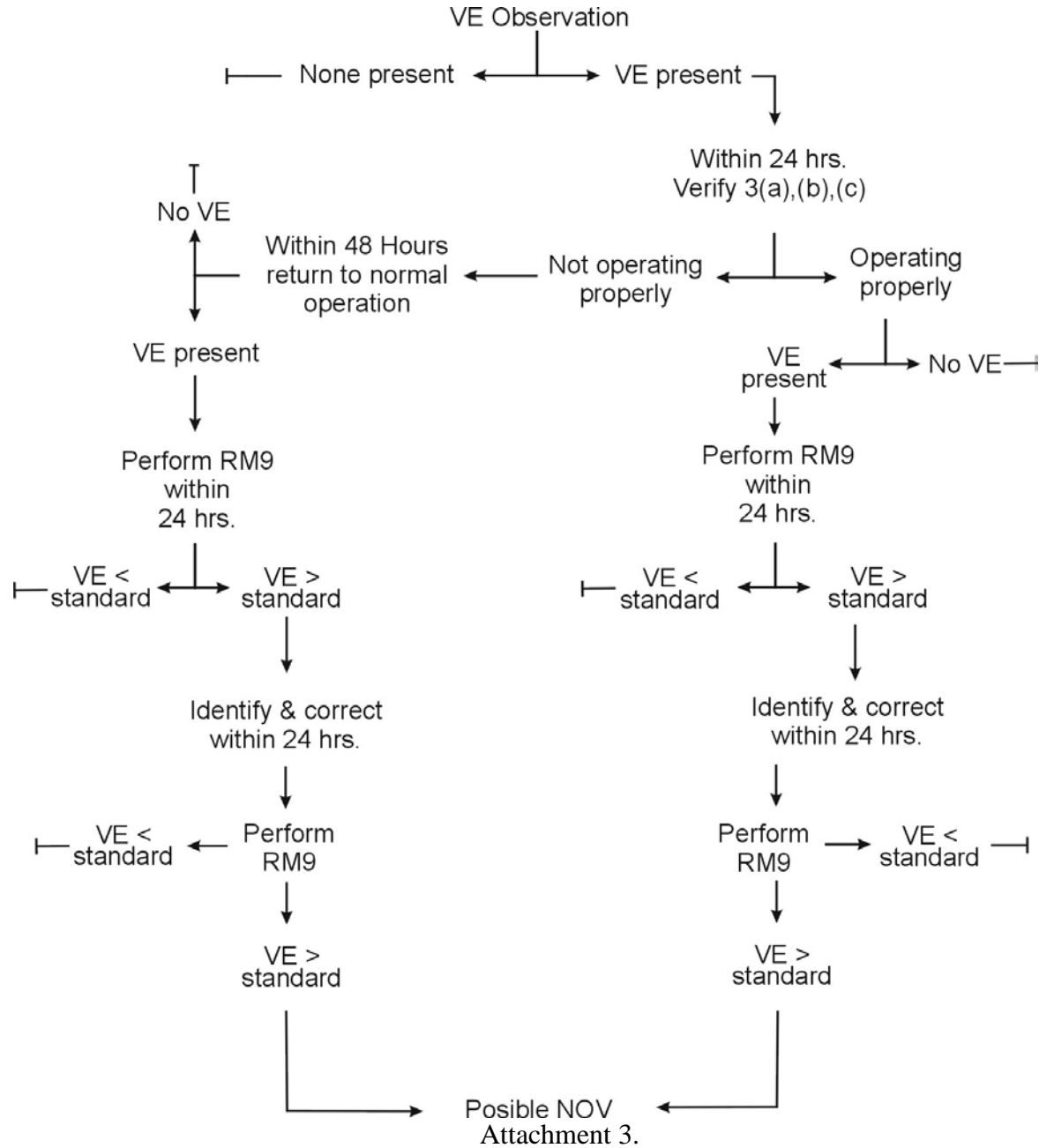
TABLE 2a TO APPENDIX A OF SUBPART A—FACILITY INVENTORY<sup>1</sup> DATA ELEMENTS FOR REPORTING EMISSIONS FROM POINT SOURCES, WHERE REQUIRED BY 40 CFR 51.30—Continued

Data elements
(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.

TABLE 2a TO APPENDIX A OF SUBPART A—FACILITY INVENTORY<sup>1</sup> DATA ELEMENTS FOR REPORTING EMISSIONS FROM POINT SOURCES, WHERE REQUIRED BY 40 CFR 51.30—Continued

Data elements
(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).

<sup>1</sup> 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.



MRRR 3M VE observation flow chart