

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

In the matter of compliance by) **Air Operating Permit**
GUY BENNETT LUMBER COMPANY) **No. Draft**
CLARKSTON, WA; LUMBER SAWMILL)
with Section 70A.15.2260 RCW, Operating Permits)
for Air Contaminant Sources, and the applicable)
rules and regulations of the Department of Ecology)

To: Guy Bennett Lumber Company Issuance Date: TBD
PO Box 670 Effective Date: TBD, 2023
Clarkston, WA 99403 Expiration Date: TBD, 2028

Responsible Official: Ms. Janice Dimke
Facility Location: 1951 Wilma Drive, Clarkston, WA
AQPID Number: A0750201

Legal Authority

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

Hereinafter, Guy Bennett Lumber Company, Clarkston Sawmill is called the permittee. The permittee is required to comply with the provisions contained within this permit.

This Renewal Air Operating Permit, DATED at Spokane, Washington, this XX day of May, 2023.

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List of Abbreviations

AOP	Air Operating Permit
BACT	Best Available Control Technology
BTU	British Thermal Units
°C	Degrees Celsius
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
dscf	Dry Standard Cubic Foot
dscf/m	Dry Standard Cubic Foot per minute
Ecology	Washington State Department of Ecology
E.I.T.	Engineer in Training
EPA	United States Environmental Protection Agency
°F	Degrees Fahrenheit
FCAA	Federal Clean Air Act
FDCP	Fugitive Dust Control Plan
ft ³	Cubic foot
gr/dscf	Grain per dry standard cubic foot
hr	Hour
MMBtu	Million British Thermal Units
MRRR	Monitoring, Recordkeeping, and Reporting Requirement
MVAC	Motor Vehicle Air Conditioner
N ₂	Nitrogen gas
NOC	Notice of Construction
NO _x	Oxides of Nitrogen
NSPS	New Source Performance Standard
O ₂	Oxygen
O&M	Operation & Maintenance
P.E.	Professional Engineer
PM	Particulate Matter
PM-10	Particulate Matter with aerodynamic diameter ≤ 10 micrometers
ppm	Parts per million
PSD	Prevention of Significant Deterioration
QIP	Quality Improvement Plan
RACT	Reasonably Available Control Technology
RCW	Revised Code of Washington
RM	EPA Reference Method from 40 CFR Part 60, Appendix A
SERP	Source Emission Reduction Plan
scfm	Standard Cubic Feet per Minute
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TAP	Toxic Air Pollutant
TPY	Tons per Year
TSP	Total Suspended Particulate
VOC	Volatile Organic Compound
WAC	Washington Administrative Code
yr	Year

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

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

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

1. Standard Conditions

1.1 Permit Shield

- 1.1.1 Compliance with the terms and conditions of this permit will be deemed compliance with those applicable requirements that are specifically included and identified in this permit as of the date of permit issuance.
- 1.1.2 The permit shield will not apply to any insignificant emissions unit or activity designated under WAC 173-401-530.

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

1.2 Enforceability

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

[WAC 173-401-625]

1.3 Permit Fees

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

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

1.4 Permit Continuation

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

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

1.5 Property Rights

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

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

1.6 Inspection and Entry

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

- 1.6.1 Enter upon the permittee's premises where a chapter 401 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
- 1.6.2 Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- 1.6.3 Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
- 1.6.4 As authorized by WAC 173-400-105 and the FCAA, sample or monitor, at reasonable times, substances, or parameters for the purpose of assuring compliance with this permit or other applicable requirements.
 - 1.6.4.1 Ecology may require the permittee to conduct stack testing and/or ambient air monitoring and report the results to Ecology.
 - 1.6.4.2 Ecology may conduct or require that a test be conducted using approved methods from 40 CFR parts 51, 60, 61 and 63 (in effect on February 20, 2001), or Ecology's Source Test Manual – Procedures for Compliance Testing. The permittee will be required to provide platform and sampling ports. Ecology must be allowed to obtain a sample from any emissions unit. The permittee will be given the opportunity to observe the sampling and to obtain a sample at the same time.
- 1.6.5 No person will obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties.
- 1.6.6 Nothing in this condition will limit the ability of EPA to inspect or enter the premises of the permittee under Section 114 or other provisions of the FCAA.

[WAC 173-401-630(2)], [WAC 173-400-105(2),(4)], [RCW 70A.15.2500], [Order No. 23AQ-E024, Approval Condition 7.c]

1.7 Duty to Comply

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

[WAC 173-401-620(2)(a)], [Order No. 23AQ-E024, Approval Condition 7.a]

1.8 Duty to Provide Information

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

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

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

1.9 Duty to Supplement or Correct Application

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

[WAC 173-401-500(6)]

1.10 Need to Halt or Reduce Activity not a Defense.

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

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

1.11 Excess Emissions Due to an Emergency

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

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

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

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

- 1.11.2 The permitted facility was being properly operated at the time of the emergency,
- 1.11.3 During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in this permit, and
- 1.11.4 The permittee submitted notice of the emergency to Ecology within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. The notice should be directed to appropriate air quality personnel at Ecology's Eastern Regional Office using the most recent contact information.

[WAC 173-401-645]

1.12 Unavoidable Excess Emissions

- 1.12.1 WAC 173-400-107 is in effect until 173-400-108 and 173-400-109 become effective.
- 1.12.2 The permittee will have the burden of proving to Ecology that excess emissions were unavoidable. This demonstration must be a condition to obtain relief under 1.12.2.1, 1.12.2.2, or 1.12.2.3.
 - 1.12.2.1 Excess emissions due to startup or shutdown conditions must be considered unavoidable provided the permittee reports as required under Condition 1.13.1 and adequately demonstrates that the excess emissions could not have been prevented through careful planning and design and if a bypass of control equipment occurs, that such bypass is necessary to prevent loss of life, personal injury, or severe property damage.
 - 1.12.2.2 Excess emissions due to scheduled maintenance must be considered unavoidable if the permittee reports as required under Condition 1.13.1 and adequately demonstrates that the excess emissions could not have been avoided through reasonable design, better scheduling for maintenance or through better operation and maintenance practices.
 - 1.12.2.3 Excess emissions due to upsets must be considered unavoidable provided the permittee reports as required under Condition 1.13.1, and adequately demonstrates that:
 - 1.12.2.3.1 The event was not caused by poor or inadequate design, operation, or maintenance.
 - 1.12.2.3.2 The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance.
 - 1.12.2.3.3 The operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the

corrective action. This includes 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]

1.12.3 WAC 173-400-108 (State-only requirement not federally enforceable) This section will be in effect as outlined in Condition 1.12.1

1.12.3.1 Notify the permitting authority.

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

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

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

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

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

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

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

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

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

[WAC 173-400-108]

1.12.4 WAC 173-400-109 (State-only requirement not federally enforceable) This section will be in effect as outlined in Condition 1.12.1.

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

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

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

[WAC 173-400-109]

1.13 Reporting

1.13.1 Monthly Deviation Reports

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

- 1.13.1.1 Deviations which represent a potential threat to human health or safety, or which the permittee believes to be unavoidable (1.12) must be reported as soon as possible, but in no case later than 12 hours after the deviation is discovered.
- 1.13.1.2 Excess emissions due to emergency (1.11), or which the source believes unavoidable (1.12), and does not meet the criteria 1.13.1.1, must be reported within two working days of the event.
- 1.13.1.3 All other deviations must be reported no later than 30 days after the end of the month during which the deviation is discovered.
- 1.13.1.4 For any month during which no permit deviations are discovered, the permittee must submit a report no later than 30 days following the end of the month stating that no deviations were observed during that period.

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

[WAC 173-401-615(3)(b)], [WAC 173-400-107]

1.13.2 Semi-Annual Monitoring Reports

The permittee must submit reports of any required monitoring (i.e., Monitoring Recordkeeping and Reporting identified in section 3) at least once every six months. Six-month periods will be from January 1st through June 30th, and from July 1st through December 31st.

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

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

1.13.3 Compliance Certifications

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

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

1.13.3.1 The certification must describe and include the following:

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

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

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

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

1.13.3.3 The permittee need not certify compliance for insignificant emission units or activities if there is no permit requirement for testing, monitoring, recordkeeping or reporting.

[WAC 173-401-530(2)(d)]

1.13.3.4 All compliance certifications must include certification by a responsible official in accordance with Condition 1.13.6.

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

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

1.13.4 Emissions Inventory

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

[WAC 173-400-105(1)]

1.13.5 Greenhouse Gas Reporting

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

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

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

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

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

[WAC 173-441]

1.13.6 Submittals

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

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

1.14 Severability

If any provision of this permit, or application of any provision of this permit, is held to be invalid, all unaffected provisions of the permit will remain in effect and be enforceable.
[WAC 173-401-620(2)(h)], [RCW 70A.15.9004]

1.15 Administrative Permit Amendments

1.15.1 An administrative permit amendment is a permit revision that:

1.15.1.1 Corrects typographical errors within the permit,

1.15.1.2 Identifies a change in the name, address, or phone number of any person identified in the permit, or provides for a similar minor administrative change at the source,

1.15.1.3 Requires more frequent monitoring or reporting by the permittee,

1.15.1.4 Allows for a change in ownership or operational control of a source where the permitting authority has determined that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to Ecology.

1.15.1.5 Incorporates into the permit the terms, conditions, and provisions from orders approving notice of construction applications processed under an EPA-approved program, provided that such a program meets procedural requirements substantially equivalent to the requirements of WAC 173-401-700, 173-401-725, and 173-401-800 that would be applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in WAC 173-401-600 through 173-401-650.

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

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

[WAC 173-401-720]

1.16 Permit Actions

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

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

1.17 Reopening for Cause

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

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

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

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

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

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

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

[WAC 173-401-730]

1.18 Off-Permit Changes

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

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

[WAC 173-401-724]

1.19 Changes not Requiring Permit Revisions

1.19.1 Section 502(b)(10) changes

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

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

made in response to an emergency must be provided as soon as possible after the event.

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

1.19.2 Changes related to Emissions trading under an emission cap

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

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

1.19.2.4 A source making a change under this section must comply with applicable preconstruction review requirements established pursuant to Condition 1.20.

1.19.2.5 No permit revision will be required, under any approved economic incentives, marketable permits, and other similar programs or processes for changes that are provided for in this permit, such as emissions trading.

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

1.20 New Source Review

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

[WAC 173-400-110], [WAC 173-400-113], [WAC 173-400-116], [WAC 173-400-171], [WAC 173-455-120], [WAC 173-400-720], [WAC 173-460], [RCW 70A.15.2210], [Order No. 23AQ-E024, Approval Condition 7.k]

1.21 Replacement or Substantial Alteration of Emission Control Technology

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

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

1.22 Operational Flexibility

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

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

[WAC 173-401-650]

1.23 Permit Appeals

This permit or any conditions in it may be appealed only by filing an appeal with the pollution control hearings board and serving it on the permitting authority within thirty days of receipt 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.

The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

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

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

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

Address and Location Information

Street Addresses:

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

Pollution Control Hearings Board
1111 Israel Rd SW
STE 301
Tumwater, WA 98501

Mailing Addresses:

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

Pollution Control Hearings Board
PO Box 40903
Olympia, WA 98504-0903

E-mail Address:

Department of Ecology
Not currently available (see WAC 371-08)

Pollution Control Hearings Board
Pchb-shbappeals@elaho.wa.gov

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

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

- 1.24.1 The permittee must comply with the following standards for recycling and emissions reductions pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in subpart B.
- 1.24.1.1 Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
 - 1.24.1.2 Equipment used during the maintenance, service, repair, or disposal must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
 - 1.24.1.3 Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
 - 1.24.1.4 Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. (“MVAC-like appliance” is defined at 40 CFR 82.152.)
 - 1.24.1.5 Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156.
 - 1.24.1.6 Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep servicing records documenting the date and type of service, as well as the quantity of refrigerant added. The owner/operator must keep records of refrigerant purchased and added to such appliances in cases where owners add their own refrigerant. Such records should indicate the date(s) when refrigerant is added pursuant to 40 CFR 82.166.
 - 1.24.1.7 Persons conducting maintenance, service, repair, or disposal of appliances must follow the prohibitions pursuant to 40 CFR 82.154.
 - 1.24.1.8 Person performing maintenance, service, repair, or disposal of appliances must certify to the Administrator that such person has acquired certified recovery of recycling equipment pursuant to 40 CFR 82.162.
- 1.24.2 If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR 82, Subpart A – Production and Consumption Controls.
- 1.24.3 If the permittee performs a service on motor (fleet) vehicles and when this service involves ozone depleting substance refrigerant in the MVAC, the permittee is subject to all applicable requirements as specified in 40 CFR 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.

- 1.24.4 The permittee will be allowed to switch from any ozone depleting substance to any alternative that is listed in the Significant New Alternative Program promulgated pursuant to 40 CFR 82, Subpart G – Significant New Alternative Policy Program.

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

1.25 Reasonably Available Control Technology (RACT)

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

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

1.26 Compliance Schedules

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

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

1.27 Record Keeping

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

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

1.27.1.2 The date(s) analyses were performed.

1.27.1.3 The company or entity that performed the analyses.

1.27.1.4 The analytical techniques or methods used.

1.27.1.5 The results of such analyses.

1.27.1.6 The operating conditions as existing at the time of sampling or measurement.

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

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

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

- 1.27.3 The permittee must retain records of all required monitoring data and support information for a period of at least five years from the date of the monitoring sample,

measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings from continuous monitoring instrumentation, and copies of all reports required by this permit.

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

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

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

1.28 General Obligation

Nothing in this permit will alter or affect the following:

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

[WAC 173-401-640(4)]

1.29 Permit Renewal and Expiration

This permit is issued for a fixed term of five years. The permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application (as outlined in WAC 173-401-510) is submitted at least 12 months, but no greater than 18 months prior to the date of permit expiration.

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

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

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

1.30 Demolition and Renovation (asbestos)

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

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

2. Applicable Requirements

Until this permit expires, is modified, or revoked, this permittee is authorized to operate the air emission units and processes outlined in Sections 2.1 through 2.6. These emission units and processes are subject to the conditions included in Sections 2.1, through 2.6, to the MRRR’s listed in Section 3, and to other terms and conditions specified in this permit.

The column entitled **Description** in each table contains only a summary/paraphrase of the condition, emission standard or work practice. The condition, emission standard, or work practice itself is the enforceable requirement and should be referenced for actual language. Condition numbers that are denoted with an asterisk indicate that streamlining of a less stringent requirement has taken place and is described in section 17.0 of the Statement of Basis.

Testing Requirements

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

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

2.1 Facility Wide

This section is applicable and enforceable with respect to all emission units source wide, including those emission units in Sections 2.2 through 2.6. Monitoring, recordkeeping, and reporting requirements in this section do not apply to insignificant emission units.

TABLE 2.1 Applicable and Enforceable Requirements for All Emission Units

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.1.1	WAC 173-400-040(2), (2)(a), and (2)(b)	F	Visible emissions must not exceed 20 percent opacity for more than three minutes in any one hour	RM 9	4M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.1.2	WAC 173-400-060	F	General process units are required to meet all applicable provisions of WAC 173-400-040 and emissions of particulate material from any operation must not exceed 0.1 grain/dscf of exhaust gas	RM 5	4M
2.1.3	WAC 173-400-040(3)	S	Particulate matter must not be deposited beyond the property line in sufficient quantity to interfere unreasonably with the use and enjoyment of other's property	None	3M
2.1.4	WAC 173-400-040(9)(a)	F	The source must perform maintenance to minimize emissions and take reasonable precautions to prevent fugitive dust from becoming airborne	None	3M
2.1.5	WAC 173-400-040(4)(a)	F	Fugitive dust control measures must be taken to prevent fugitive emissions	None	2M
2.1.6	WAC 173-400-040(5)	S	Any producer of an odor which may unreasonably interfere with any other property owner's use and enjoyment of his property must reduce these odors to a reasonable minimum	None	3M
2.1.7	WAC 173-400-040(6)	F	No person must cause or allow the emission of any air contaminant if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business	None	3M
2.1.8	WAC 173-400-040(8)	F	No person must conceal or mask an emission of an air contaminant	None	1M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.1.9	WAC 173-400-200(2)	F	No source may use dispersion techniques or excess stack height to meet ambient air quality standards or PSD increment limitations	None	1M
2.1.10	WAC 173-400-205	F	Varying the rate of emission of a pollutant according to atmospheric conditions is prohibited, except as directed according to air pollution episode regulations	None	1M
2.1.11	RCW 70A.15.1070	S	Causing air pollution in violation of Chapter 70A.15 RCW is unlawful	None	1M
2.1.12	Order No. 23AQ-E024, Approval Condition 7.g	F	Open burning is not allowed on site	None	2M
2.1.13	WAC 173-400-040(1)(c)	F	All emissions units are required to use RACT	None	2M

2.2 Hogged Fuel Boiler

Table 2.2

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.2.1	WAC 173-400-040(2), (2)(a), and (2)(b)	F	Visible emissions must not exceed 20 percent opacity for more than three minutes in any one hour	RM 9	10M
2.2.2	WAC 173-400-070(2)(a)	F	Opacity may exceed 20 percent for 15 minutes once in any eight-hour period for soot blowing/grate cleaning.	RM 9	10M
2.2.3	Order No. 23AQ-E024, Approval Condition 7.j	F	No visible emissions must be allowed beyond the property line	RM 22	6M
2.2.4	WAC 173-400-050(1)	F	Hogged fuel boilers are required to meet all applicable provisions of WAC 173-400-040	RM 5	8M, 9M, 13M
2.2.5	Order No. 23AQ-E024, Approval Condition 2.c.i.A	F	PM emissions must be < 0.05 grains per dry standard cubic foot	RM 5	8M, 9M, 13M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			(7 percent O ₂) over a one-hour average		
2.2.6	Order No. 23AQ-E024, Approval Condition 2.c.i.B	F	CO Emissions must not exceed 57 pounds per hour over a one-hour average	RM 10	8M
2.2.7	WAC 173-400-040 (7, 1st ¶)	F	SO ₂ ≤ 1000 ppm @ 7 percent O ₂ (60-minute average)	RM 6	7M
2.2.8	Order No. 23AQ-E024, Approval Conditions 2.b.i.B, 4, 5, 6	F	Boiler steam generation rate must not exceed the value obtained through testing and limit as outlined in 14M	None	11M, 14M
2.2.9	Order No. 23AQ-E024, Approval Condition 2.b.i.A	F	An electrostatic precipitator (ESP), PPC Industries 4500 must be installed and online any time the boiler is operated	None	2M
2.2.10	WAC 173-400-070(2)(b)	F	All hogged fuel boilers must utilize RACT and must be operated and maintained to minimize emissions	None	5M, 12M
2.2.11	Order No. 23AQ-E024, Approval Condition 4.a.ii	F	O&M manual must be kept updated	None	12M
2.2.12	Order No. 23AQ-E024, Approval Condition 7.b	F	Approval Order and O&M Manual must be in the working vicinity and available to employees in direct operation of boiler	None	2M
2.2.13	Order No. 23AQ-E024, Approval Condition 3.c	F	The boiler and associated equipment must be operated in a manner consistent with the O&M manual and NOC application and in accordance with good practices for minimizing air emissions	None	5M
2.2.14	40 CFR 64.7(b)	F	Permittee must maintain monitoring equipment specified in 9M, 10M and 14M, including but not limited to, maintaining necessary parts for routine repairs of the equipment	None	2M
2.2.15	Order No. 23AQ-E024, Approval Condition 7	F	The operation of the boiler must comply with WAC 173-400 and RCW 70A.15	None	2M
2.2.16	40 CFR 63.11201(b),	F	At all times the permittee must operate and maintain the hog	None	19M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
	63.11205(a), 63.11223(b), 63.11225(b), 63.11225(c), 63.11225(d) (40CFR63 Subpart 6J)		fuel boiler in a manner consistent with safety and good air pollution control practices for minimizing emissions		
2.2.17	40 CFR 63.11196(3), 63.11201, 63.11214 (40CFR63 Subpart 6J)	F	The hogged fuel boiler must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment was completed on June 30, 2014, that meets the assessment requirements specified in 40 CFR 63.11201.	None	20M

2.3 Lumber Drying Kilns (Requirements applying to all Kilns)

TABLE 2.3

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.3.1	Order No. 23AQ-E024, Approval Condition 2.a.i.A	F	Dry kilns are limited to a throughput of 62.4 million board feet of lumber dried per year (MMbf/year) calculated as a rolling 12-month average.	None	15M
2.3.2	Order No. 23AQ-E024, Approval Condition 2.a.i.B	F	For Ponderosa Pine and other species, the kilns are limited to a throughput of 55 MMbf/year calculated as a rolling 12-month average.	None	15M
2.3.3	Order No. 23AQ-E024, Approval Condition 6.e	F	Any plans to increase kiln production capacity or to modify any kiln or their operating procedures	None	2M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			must be reported to Ecology		

2.4 Lumber Drying Kiln Number 3

Table 2.4

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.4.1	Order No. 23AQ-E024, Approval Condition 2.c.ii.B	F	Opacity from the dry kiln exhaust must not exceed 10 percent opacity over a six minute time interval	RM 9	4M
2.4.2	Order No. 23AQ-E024, Approval Condition 7.j	F	No visible emissions from the dry kiln must be allowed beyond the property line	RM 22	6M
2.4.3	Order No. 23AQ-E024, Approval Condition 2.c.ii.A	F	PM-10 emissions from the dry kiln must not exceed 0.1 gr/dscf	None	4M
2.4.4	Order No. 23AQ-E024, Approval Condition 7.e	F	Dry kiln instrumentation must be provided as specified in the O&M manual	None	2M
2.4.5	Order No. 23AQ-E024, Approval Condition 2.b.ii.A	F	No heating energy source other than steam heat must be used with the new dry kiln	None	2M
2.4.6	Order No. 23AQ-E024, Approval Condition 2.b.ii.B	F	Automatic energy management of temperature and relative humidity must be used during operation of the new dry kiln	None	2M
2.4.7	Order No. 23AQ-E024, Approval Condition 7.b	F	Approval Order and O&M Manual must be in the working vicinity and available to employees in direct operation of the dry kilns	None	2M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.4.8	Order No. 23AQ-E024, Approval Condition 4.a.ii	F	O&M manual must be kept updated	None	16M
2.4.9	Order No. 23AQ-E024, Approval Condition 7.e	F	The dry kiln and associated equipment must be operated in a manner consistent with the O&M manual, NOC application, and in accordance with good practices for minimizing air emissions	None	5M
2.4.10	Order No. 23AQ-E024, Approval Condition 7	F	The operation of the kilns must comply with WAC 173-400; 173-460; and RCW 70A.15	None	2M

2.5 Chip and Sawdust Conveyance, Storage, and Transfer System¹

Table 2.5

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.5.1	Order No. 23AQ-E024, Approval Condition 2.c.iii.B	F	Opacity from the storage bin vents must be no more than five percent, averaged over a six-minute period	RM 9	4M
2.5.2	Order No. 23AQ-E024, Approval Condition 7.j	F	No visible emissions from the storage bin vents must be allowed beyond the property line	RM 9	6M
2.5.3	WAC 173-400-113(2) (b)	F	There must be no visible emissions other than a periodic wood chip, from the storage bin vents	RM 9	4M

¹ The requirements under this section apply to the conveyance, storage, and transfer system that was installed in 1992. The system currently conveys sawdust, hogged fuel and green chips from the sawmill, and dry wood chips from the planer mill. Currently, the green wood chips from the sawmill as well as the dry wood chips from the planer mill are conveyed pneumatically, and the sawdust and hogged fuel from the sawmill are conveyed via mechanical conveyors. The conditions under this section do not apply to the pneumatic conveyance of planer shavings.

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.5.4	Order No. 23AQ-E024, Approval Condition 2.c.iii.A	F	Particulate Matter emissions from the storage bin vents must be < 0.01 gr/dscf	RM 5	4M
2.5.5	Order No. 23AQ-E024, Approval Condition 2.b.iii.B	F	The air pressure for the pneumatic conveyance system(s) must not exceed 10 pounds per square inch	None	17M
2.5.6	Order No. 23AQ-E024, Approval Condition 2.b.iii.A	F	Sawdust must be conveyed mechanically, wood chips pneumatically, and hogged fuel via an enclosed belt conveyor	None	2M
2.5.7	Order No. 23AQ-E024, Approval Condition 4.a	F	A fugitive dust control plan must be followed and kept updated	None	2M
2.5.8	Order No. 23AQ-E024, Approval Condition 4.a.ii	F	O&M manual must be followed and kept updated to reflect any modifications	None	18M
2.5.9	Order No. 23AQ-E024, Approval Condition 7.b	F	Approval Order and O&M Manual must be in the working vicinity and available to employees in direct operation of the conveyance system	None	2M
2.5.10	Order No. 23AQ-E024, Approval Conditions 3.c and 7.e	F	The conveyance system equipment must be operated in a manner consistent with the O&M manual and NOC application and in accordance with good practices for minimizing air emissions	None	2M

2.6 Wood Waste Collection and Transport System

The Wood Waste Collection and Transport System and all sources of air emissions associated with the processes (excluding baghouses) are subject to those conditions, emission standards, and work practices included in Section 1 “Standard Conditions”,

Section 2.1 "Section 1 Facility Wide Requirements" and the associated Monitoring Recordkeeping and Reporting Requirements in Section 3.

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

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

General

1M. The permittee must conscientiously monitor site operations and promptly report any deviations.

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

2M. At least once every 12 months, the permittee must review actual operations and any other relevant information to determine if facility operations are being conducted in accordance with each specific requirement.

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

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

3M. The permittee must maintain records of all complaints received. Ecology must be notified within three working days of receipt of any complaints. The permittee must address and respond to all complaints within three working days of receipt of the complaint. The recordkeeping must include the following with regard to the complaint and the associated deviation:

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

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

4M. The permittee must conduct monitoring in accordance with the following.

- 1) At least once per month, as well as any time excess visible emissions are observed, the permittee must perform surveys for the purpose of observing all emission units that are sources of potential visible and/or PM emissions to which standards apply facility wide as well as those emission units and activities for which this MRRR is specified in the "MRRR Reference" column in the Section 2 tables. Insignificant emissions units are not subject to this MRRR requirement.

Each survey must be performed as follows:

- a) The survey must be conducted from a location with a clear view of the emission point and where the sun is as close as possible to being directly behind the observer. The observer's location must be at least 15 feet but not more than $\frac{1}{4}$ mile from the source.
 - b) The survey must be conducted while the relevant emission unit as well as the associated facility process is in normal operation.
 - c) The observer will be educated in the general procedures for determining the presence of visible emissions (i.e., effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, observer position relative to source and sun, and the presence of uncombined water).
 - d) The survey must consist of a minimum of four consecutive 15-second visual observations of each stack or emission point to identify whether the emission point under observation exhibits visible emissions. The observer must look away from the emission point under observation between each observation in order to rest their eyes.
 - e) The permittee must develop a standard form to be used for the visible emissions surveys described above. A copy of the developed form must be provided to Ecology.
- 2) Upon completion of the visual survey, the permittee's corrective actions must be governed by the following:
- a) If visible emissions are observed to be zero, no corrective action is required.
 - b) If visible emissions are observed, the following actions must be taken, as described below:
 - i) As soon as possible, but no later than 24 hours after visible emissions are observed, the permittee must verify that all equipment which may affect emissions is performing its normal, designed function and being operated according to standard procedures. If any equipment is not performing as described, corrective action must be initiated within 24 hours after the original observation of visible emissions. The corrective action taken must return the equipment to normal operation as soon as possible and be designed to prevent the likely recurrence of the cause of the deviation.
 - a. If the corrective action taken results in a return to conditions under which visible emissions are not observable via the method outlined in 1) above within the 24-hour window after visible emissions were originally observed, no further corrective action is required.
 - b. If, after corrective action is taken, visible emissions are still observed, or if the necessary corrective action requires a period of time beyond the 24-hour window, the permittee must perform 2)b)ii):

- ii) The permittee must perform, or have performed, RM 9 on the source of the emissions. The RM 9 test must be conducted only by personnel certified to perform RM 9 in accordance with EPA guidelines. The test must occur as soon as possible, but no later than 48 hours after the original observation of visible emissions.
 - a. If the visible emissions as determined by RM 9 do not exceed the applicable standard, no further corrective action is required.
 - b. If a violation of any applicable opacity standard is documented, the permittee must perform 2)b)iii):
 - iii) If a violation of any applicable opacity standard is documented, appropriate and timely action must be initiated (as soon as possible, but no later than 24 hours after discovery of the violation via RM 9 test) to identify and correct the problem causing the opacity. The corrective action taken must return the equipment to normal operation as soon as possible and be designed to prevent the likely recurrence of the cause of the violation. Once corrective action has been taken to solve the problem, the permittee must perform, or have performed, RM 9 on the source of emissions in order to demonstrate re-establishment of normal operation. Taking corrective action does not relieve the permittee from complying with the underlying condition, emission standard or work practice, nor does it relieve the permittee from the obligation to report any permit deviations as required in Standard Condition 1.13.1
- 3) The permittee must conduct recordkeeping in accordance with the following.
- a) The permittee must maintain records of all RM 9 tests performed for a period of five years. This recordkeeping requirement must be satisfied by keeping the original RM 9 test form.
 - b) The permittee must maintain a list of site personnel who have been educated as described in 1), c) above, as well as a list of site personnel who are currently certified to perform RM 9.
 - c) Recordkeeping with regard to each deviation must include the following:
 - i) Time, date, and duration of the deviation,
 - ii) Cause of the deviation,
 - iii) Estimate of excess emissions and magnitude of deviation, and
 - iv) Corrective action taken, and the results of such action.
- 4) The permittee must conduct reporting in accordance with the following.
- a) Copies of all RM 9 test forms which either document a deviation or re-establishment of normal operation following a deviation must be submitted to Ecology as part of the monthly deviation reports as required by Standard Condition 1.13.1. In addition to the RM 9 form, reporting must also include copies of the visible emission observation form(s) as

well as the information required under recordkeeping under 3), c) above. The permittee is not required to submit RM 9 forms for tests conducted under 2), b), ii) above, which do not document a deviation or violation.

- b) Upon discovery that the monitoring as designed is insufficient to provide indications of all deviations, the permittee must notify Ecology of the monitoring deficiency.

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

- 5M.** At least once every 12 months, the permittee must perform a complete review of the Operation and Maintenance manuals, permit application materials (Notice of Construction) and other relevant documents (Fugitive Dust Control Plan) for the referenced unit and associated equipment. The purpose of this review will be to verify that the emission unit and associated equipment is being operated in accordance with the documents stated above and with good air pollution control practices in mind.

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

The permittee must maintain records that include the date such reviews occur as well as the name of the person conducting the review. Upon discovery that any equipment is being operated in a manner inconsistent with any of the above-mentioned documents, the permittee must initiate corrective action within two business days. All such discoveries must be reported to Ecology as required by Standard Condition 1.13.1 of this permit.

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

- 6M.** The following will apply generally, facility wide:

Monitoring – At least once per month, as well as any time visible emissions are observed, the permittee must perform complete walk-around surveys for the purpose of determining the presence of visible emissions throughout the facility site. The surveys must be conducted while the facility is in operation, and must include observation for any visible emissions, including fugitive emissions, regardless of the source.

Recordkeeping – Information for each survey indicating the date the survey was performed, the name of the person performing the survey, the weather at the time of the survey, an indication of whether any visible emissions were observed, a description of the cause of the visible emissions, the corrective action taken, and the results of such action.

Reporting – Monthly reporting of deviations must be performed as described in Standard Condition 1.13.1, as well as annual certification of compliance as described in Standard Condition 1.13.3. Any monthly deviation reports documenting visible emissions observed must include the time, date and duration of the deviation, a description of the cause of the visible emissions, the corrective action taken, and the results of the corrective action.

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

7M. Semi-Annually – As part of the semi-annual monitoring report, the permittee must submit parametric monitoring data for parameters that are used to calculate emissions. This may include actual hours of operation, actual steam production, etc.

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

Calculations should be adjusted for percent oxygen or carbon dioxide (if not already done as part of the source test) as required by the applicable requirement and should indicate pollutant emission rate and concentration in the same units as the limit(s) specified in the applicable requirement(s). The emissions inventory submittal must include a statement clearly indicating the emission factor that is being used, justification for the use of the emission factor, clear identification of all operating parameters used in the calculation method, and an example of the calculation method used.

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

HOGGED FUEL BOILER

8M. Periodic performance testing must be conducted at least once every five years. Following periods of facility shutdown due to market conditions, performance testing must be conducted within 180 days of initial re-start. The following conditions will apply to the testing:

- 1) Testing must be conducted for all pollutants as determined by Ecology. Testing for all pollutants must be performed using the appropriate EPA reference test methods from 40 CFR 60, Appendix A and 40 CFR 51, Appendix M. At a minimum, testing must be conducted for filterable and condensable PM-10 as well as CO.
- 2) The testing must consist of at least three total runs for one hour each. All three runs must be conducted at a steaming rate of at least 90 percent of the highest hourly steam generation rate used during the 12 most recent operating months.
- 3) Opacity as reported by the COMS as well as all monitored boiler operating parameters must be recorded during the entire duration of the testing and submitted as part of the test report.
- 4) Opacity observations using EPA Reference Method 9 must be conducted for at least one six-minute period during each run of the source testing. The results of each Reference Method 9 test must be submitted as part of the test report.
- 5) An independent testing firm must conduct the testing and must submit a test plan for Ecology's approval at least 30 days prior to the source testing. The test plan must include the following information, at a minimum:

- a) Identification of each emission unit to be tested.
 - b) The operating parameters to be monitored during the test.
 - c) A description of the emission units to be tested.
 - d) The time and date of the proposed source test.
 - e) Identification and qualifications of the source test personnel,
 - f) A description of the test methods and procedures to be used.
- 6)** The permittee must notify Ecology of the date of the source testing at least 30 days prior to the date of testing. The permittee must notify Ecology as soon as possible if any planned source testing is cancelled or rescheduled.
- 7)** The test report must be sent to Ecology within 60 days after the testing. Test reports must include the following information, at a minimum:
- a) The information described in the test plan and any subsequent test plan approval letters.
 - b) Field and analytical laboratory data.
 - c) Quality assurance/quality control procedures and documentation.
 - d) Analyzer data recorded during the test.
 - e) A summary of results, reported in units and averaging periods consistent with the applicable emission limit.
 - f) A summary of control system and equipment operating conditions.
 - g) Copies of all field data.
 - h) Chain of custody information.
 - i) Calibration documentation.
 - j) Discussion of any abnormalities associated with the results.
 - k) A statement signed by the senior management official of the testing firm certifying the validity of the source test report.
 - l) Emission calculations.
- 8)** Ecology may require testing for additional pollutants as deemed necessary.
- 9)** Alternate methods of testing and alternate testing requirements may be proposed by the permittee in writing to Ecology. Permission for use of alternate forms of testing and requirements must be approved in writing by Ecology.

[Order No. 23AQ-E024, Approval Condition 5.a]

9M. Monitoring, Recordkeeping, and Reporting as required by 40 CFR 64 – CAM will be subject to the following general conditions:

- 1) The owner or operator must conduct all monitoring in continuous operation (or must collect data at all required intervals) at all times that the pollutant-specific emission unit is operating, with the following qualifications:
 - a) Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities must not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement.
 - b) The owner or operator must use all data collected during all other periods in assessing the operation of the control device and associated control system.
 - c) “Monitoring malfunction” is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

[40 CFR 64.7(c)]

2) Semi-annual CAM monitoring reports must include the following:

- a) Summary information on the number, duration, and cause (including unknown cause, if applicable) of deviations or violations, as applicable, and the corrective actions taken,
- b) Summary information on the number, duration, and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks), and
- c) A description of any actions taken during the reporting period to implement any Quality Improvement Plan (QIPs) in effect.

[40 CFR 64.9(a)]

3) The following conditions will apply to all CAM recordkeeping:

- a) The owner or operator must maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan(s) required as well as any activities undertaken to implement a quality improvement plan, and any other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).
- b) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review and does not conflict with other applicable recordkeeping requirements.

[40 CFR 64.9(b)]

10M. Monitoring – A Continuous Opacity Monitoring System (COMS) which meets the approval requirements of the Environmental Protection Agency, is installed, and must be maintained.

- 1) The COMS must conform to all provisions of Title 40, CFR Part 60, Appendix B, Performance Specification 1 – Specifications and Test Procedures for Specifications and Test Procedures for Continuous Opacity Monitoring Systems in Stationary Sources.
- 2) The COMS must be operated using quality assurance procedures conforming to EPA 340/1-86-010, Recommended Quality Assurance Procedures of Opacity CEMS.
- 3) The permittee must prepare a Quality Assurance (QA) Plan outlining the quality assurance procedures that are proposed. Such a document must specify the frequency at which each quality assurance procedure will be performed.

Recordkeeping – The permittee must maintain the following records related to the QA Plan and COMS. Such records must be retained for a period of at least five (5) years and must be well organized and readily accessible for inspection by Ecology personnel:

- 1) A copy of the QA Plan,
- 2) Records of all quality assurance procedures performed for a period of five (5) years, and
- 3) Chart recorder readings or appropriate digital data from the COMS.

Reporting:

- 1) The QA Plan has been submitted to Ecology for approval.
- 2) Any 6-minute intervals with opacities greater than 20 percent recorded by the COMS must be included in the monthly deviation report as required by Standard Condition 1.13.1.

[Order No. 23AQ-E024, Approval Conditions 4.g.i.B and 4.g.ii.E] [40 CFR 64.3, 64.4(d), 64.7(d), 64.7(e), 64.8], [WAC 173-401-615(1)(b)], [WAC 173-401-630(1)] (This MRRR includes gapfilling)

11M. The following conditions will apply to the monitoring, recordkeeping, and reporting required for the hogged fuel boiler.

- 1) The following monitoring equipment must be maintained in proper operating condition. The equipment must be installed and operational at all times during boiler operation.
 - a) Equipment necessary to monitor steam generation rate and produce hourly steam production records.
 - b) Equipment to measure differential pressure on the multiclone as required by CAM.
 - c) Continuous Opacity Monitoring System on the boiler exhaust stack as required elsewhere in this permit.
 - d) Equipment to monitor secondary voltage and secondary current on each of the electrostatic precipitator transformer rectifier (T/R) sets.
- 2) The following recordkeeping specific to the hogged fuel boiler must be retained for a period of five years and kept in an organized, legible manner readily available for inspection by Ecology personnel.

- a) Hourly records of steam generation rate.
 - b) Steam generation deviation reports in accordance with Standard Condition 1.13.1.
 - c) The duration and nature of any downtime for the steam generation rate metering and recording equipment.
 - d) The results of any audits, accuracy checks, or calibration tests on rate metering and recording and other equipment instrumentation.
 - e) All performance testing reports.
 - f) Chart recorder readings or computer file readings from the COMS.
 - g) A log must be maintained to record operating problems and maintenance performed on the control equipment.
 - h) O&M manual and maintenance records.
- 3) Reporting specific to the hogged fuel boiler must be conducted in accordance with the following:
- Not later than 30 days following the end of each month, the permittee must submit the following information to Ecology:
- a) The highest one-hour average steam generation rate used during the month,
 - b) Identification of all instances where the highest one-hour average steam generation rate exceeded the allowable limit. For each such instance, the report must include the time, date and duration of the occurrence, the magnitude of the steam generation excess, the probable cause of the deviation, as well as corrective actions taken and planned in order to prevent the reoccurrence of such a deviation.
 - c) The duration and nature of any downtime for the steam generation rate metering and recording equipment,
 - d) The results of any audits, accuracy checks, or calibration tests on the steam generation rate metering and recording equipment, as well as other instrumentation.

[Order No. 23AQ-E024, Approval Conditions 4.g and 6.d] [WAC 173-401-630(1)], [WAC 173-401-615(1)(b)] (This MRRR includes gapfilling)

12M. The permittee must create, follow, and maintain an O&M manual for the hogged fuel boiler. The O&M manual must be maintained in an up-to-date manner, well organized, and easily accessible for inspection by Ecology personnel. The following minimum information must be included in the manual:

- 1) Normal operating parameters,
- 2) A maintenance schedule,

- 3) A list of all monitoring and recordkeeping requirements,
- 4) A description of the monitoring procedures for the boiler.

[Order No. 23AQ-E024, Approval Condition 3.b], [WAC 173-401-615(1)(b) and (c)] (This MRRR includes gapfilling)

13M. The following will function as Compliance Assurance Monitoring (CAM) for the hogged fuel boiler.

- 1) The permittee must conduct monitoring in accordance with the following.
 - a) Equipment must be provided that monitors, and displays, electrostatic precipitator (ESP) secondary voltage (kilovolts) and secondary amperage (milliamps) for each transformer/rectifier set as well as differential pressure (inches of water column) across the multiclone.
 - b) At least once per day, the permittee must evaluate the data obtained through recordkeeping as described in 2) a) below with respect to the following criteria:
 - i) The daily average ESP secondary voltage for the outlet field must not be less than 30 kV for any two consecutive days.
 - ii) The daily average multiclone pressure drop must be within the operating range of 1.0 to 4.5 inches water column.
 - c) Under conditions that meet the criteria outlined in 1) b) above, no corrective action is required under CAM.
 - d) In the event that either of the criteria outlined in 1) b) above are not met, corrective action consistent with the following must be taken.
 - i) As soon as possible, but no later than four hours after discovery of the deviation, the permittee must 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.
 - ii) Corrective action taken may include, but will not be limited to, checking rappers and vibrators for proper operation, checking multiclone and rotary valve 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 sets for an appropriate amount of time, obtaining manufacturer advice, and ESP shutdown and internal inspection along with appropriate subsequent maintenance and/or repair.
- 2) The permittee must conduct recordkeeping in accordance with the following.
 - a) At least once per eight-hour shift, the permittee must record the secondary voltage and secondary current for each T/R set as displayed on the equipment provided.

- b) At least once per day, the daily average secondary voltage for the previous day must be calculated by computing the arithmetic mean of the three recorded values.
 - c) At least once per eight-hour shift, the multiclone pressure drop must be recorded.
 - d) In the event of a deviation from the criteria outlined in 1) b) above, the permittee must maintain records documenting any ESP or multiclone corrective action taken, and the results of such action. The records must be retained in a well-organized manner and easily accessible for inspection by Ecology personnel.
- 3) The permittee must conduct reporting in accordance with the following.
- a) In the event of a deviation from the criteria outlined in 1) b) above, the permittee must submit a report as part of, or attached to, the monthly deviation report as described in Standard Condition 1.13.1. The report must 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, a description of the corrective action taken, and the results of the corrective action.
 - b) Upon discovery that the monitoring as designed is insufficient to provide indications of all deviations, the permittee must notify Ecology of the monitoring deficiency.

[40 CFR 64.3, 64.4(d), 64.7(d), 64.7(e), 64.8]

14M. The maximum allowable steam generation rate is 27,000 pounds per hour.

[Order No. 23AQ-E024, Approval Condition 2.b.i.B]

ALL LUMBER DRY KILNS

15M. The following conditions will apply to the monitoring, recordkeeping, and reporting required for all the lumber drying kilns.

- 1) The following monitoring must be performed:
 - a) The lumber throughput by species for each dry kiln must be monitored.
- 2) The following recordkeeping specific to the lumber drying kilns must be retained for a period of five years and kept in an organized, legible manner readily available for inspection by Ecology personnel.
 - a) Monthly lumber production for each dry kiln by wood species.
 - b) Monthly and twelve-month rolling average emissions of VOCs by wood species must be calculated each month for each dry kiln. The calculations must use the following emission factors unless otherwise approved by Ecology or amended to reflect source testing results. Pounds of VOC per thousand board feet of lumber dried (lb/mbf), where x is the maximum schedule set or one hour average of the air temperature entering the kiln in degrees Fahrenheit as prescribed below:
 - i) Non-resinous Softwood Species:

- a. Western True Firs (Bristlecone Fir, California Red Fir, Grand Fir, Noble Fir, Pacific Silver Fir, Subalpine Fir, and White Fir):
0.00817x – 1.02133.
- b. Western Hemlock: 0.00369x – 0.39197
- c. Species not otherwise listed: 0.00817x – 1.02133
- ii) Resinous Softwood Species (Non-Pine Family):
 - a. Douglas Fir: 0.01460x – 1.77130
 - b. Engelmann Spruce: 0.1769
 - c. Species not otherwise listed: 0.01460x – 1.77130
- iii) Resinous Softwood Species (Pine Family):
 - a. Lodgepole Pine: 1.1352
 - b. Ponderosa Pine: 0.02083x – 1.30029
 - c. Species not otherwise listed: 0.02083x – 1.30029
- c) Calculated monthly and twelve-month rolling average emissions of PM-10. The PM-10 emissions must be calculated by multiplying the lumber production by the following emission factor: 50 pounds PM-10 per million board feet of lumber dried.
- d) Records of the nature and details concerning any situation (emergency or otherwise) that results in excessive emissions from any of the kilns.
- e) A file of any performance testing results.
- f) A copy of the O&M manual.
- g) Dry kiln maintenance records.
- 3) Reporting specific to the lumber drying kilns must be conducted in accordance with the following.
 - a) No later than 30 days following the end of each month, the following information must be submitted to Ecology for the previous month's operation:
 - i) Dry kiln throughput by wood species for all kilns for the most recent twelve months.
 - ii) VOC emissions as calculated under 2) b) above for the previous month and the most recent twelve months.

iii) PM-10 emissions as calculated under 2) c) above the previous month and the most recent twelve months.

iv) The nature and details of any emergency or other deviation as recorded under 2) d) above.

b) Any future performance testing must comply with minimum testing requirements as determined by Ecology.

[Order No. 23AQ-E024, Approval Conditions 5.b and 6.f], [WAC 173-401-630(1)] (This MRRR includes Streamlining and gapfilling)

LUMBER DRYING KILN #3

16M. The permittee must maintain and follow an O&M manual for dry kiln no. 3. The O&M manual must be maintained in an up-to-date manner, well organized, and easily accessible for inspection by Ecology personnel. The following minimum information must be included in the manual.

- 1) Normal operating parameters,
- 2) A maintenance schedule,
- 3) A list of all monitoring and recordkeeping requirements for the dry kiln,
- 4) A description of the monitoring procedures for the dry kiln.

[Order No. 23AQ-E024, Approval Condition 3.b], [WAC 173-401-530(1)]

CHIP AND SAWDUST CONVEYANCE, STORAGE AND TRANSFER SYSTEM

17M. The following conditions will apply to the monitoring and recordkeeping required for the chip and sawdust conveyance, storage, and transfer system.

- 1) The following monitoring must be performed:
 - a) A gauge to monitor the air pressure of the pneumatic conveyance system.
 - b) Systems and instruments as necessary to monitor total lumber production.
- 2) The following recordkeeping related to the chip and sawdust conveyance, storage and transfer system must be retained for a period of five years and kept in an organized, legible manner readily available for inspection by Ecology personnel.
 - a) Annual lumber production.
 - b) Monthly air pressure readings for the pneumatic conveyance system.
 - c) Regular maintenance records.

[Order No. 23AQ-E024, Approval Condition 4], [WAC 173-401-630(1)] (This MRRR includes gapfilling)

18M. The permittee must maintain and follow an O&M manual for all equipment associated with the chip and sawdust conveyance, storage, and transport system that has the potential to affect

emissions to the atmosphere. The O&M manual must be maintained in an up-to-date manner, well organized, and easily accessible for inspection by Ecology personnel. The following minimum information must be included in the manual:

- 1) Normal operating parameters,
- 2) A maintenance schedule,
- 3) A list of all monitoring and recordkeeping requirements,
- 4) A description of all monitoring procedures.

[Order No. 23AQ-E024, Approval Condition 3]

BOILER AREA SOURCE RULE

19M. Performance tune-ups of the boiler must be conducted every five years. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup. Each five-year tune-up must be conducted no more than 61 months after the previous tune-up. The burner inspection and the inspection of the system controlling the air-to-fuel ratio may be delayed until the next scheduled unit shutdown; however, the permittee must conduct these inspections at least once every 72 months. The permittee must maintain records identifying the boiler, the date of tune-up, the procedure followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.

The permittee must prepare, by March 1st of each five-year period, and submit to Ecology or the EPA upon request, a five-year compliance certification report for the previous calendar years containing the information specified in 40 CFR 63.11225(b). The permittee must submit the report by March 15th if any instance occurred as described by 40 CFR 63.11225(b)(3).

The permittee must maintain onsite and submit, if requested by Ecology or the EPA, a five-year report containing:

1. 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.
2. A description of any corrective actions taken as a part of the tune-up of the boiler.
3. The type and amount of fuel used over the 12 months prior to the five-year tune-up of the boiler.

The permittee must also maintain:

1. Records of the occurrence and duration of each malfunction of the boiler.
2. Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in 40 CFR 63.11205(a) including corrective actions to restore the malfunctioning boiler to its normal or usual manner of operation.

[40 CFR 63.11201(b), 63.11205(a), 63.11223(b), 63.11225(b), 63.11225(c), 63.11225(d)]

20M. The permittee achieved compliance with the energy assessment requirement on June 30, 2014.

The permittee must retain signed certification that an energy assessment of the boiler and its energy use systems was completed and is an accurate depiction of the facility.

[40 CFR 63.11196(3), 63.11214]

4. Inapplicable Requirements

Ecology has determined that the entire source, including all emission units, is not subject to the following requirements at the time of permit issuance. Some of the requirements listed below may become applicable during the permit term due to an invoking event, even though the requirement is deemed inapplicable at the time of permit issuance. Such requirements must therefore be met on a timely basis by the permittee through submittal of a compliance schedule, per WAC 173-401-510(2)(h)(iii)(B).

Inapplicable Requirement	Requirement Description	Explanation
40 CFR 60, JJJJ	National Emission Standards for Stationary SI Engines	The facility does not have stationary SI engines.
40 CFR 61	National Emission Standards for Hazardous Air Pollutants	The facility is not a stationary source for which a standard is prescribed.
40 CFR 63, Subpart DDDD	National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products	No use of glues or chemicals. The permittee does not operate a major source of hazardous air pollutants.
40 CFR 63, Subpart ZZZZ	National Emission Standards for Reciprocating Internal Combustion Engines	The facility does not have reciprocating internal combustion engines.
40 CFR 63, Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process heaters	The permittee does not operate a major source of hazardous air pollutants.
40 CFR 68	Chemical Accident Prevention Provisions	Facility potential emissions far below thresholds for program applicability .
40 CFR 72	Acid Rain Program	Insufficient emissions of NOx and SOx
Chapter 173-480 WAC	Ambient Air Quality Standards and Emission Limits for Radionuclides	Source does not emit this regulated pollutant.
Chapter 173-481 WAC	Ambient Air Quality and Environmental Standards for Fluorides	Source does not emit this regulated pollutant.

Appendix A: Federal and State Regulation Date Reference List

WAC	F	S	CFR	F	RCW	S
425	X	3/13/2000	52.33	7/1/2022	70.94.040	2022
441	X	3/12/2022	60.11	7/1/2022	70.94.152	2022
460	X	11/22/2019	60.12	7/1/2022	70.94.153	2022
400-035	X	9/16/2018	60.332	7/1/2022	70.94.154	2022
400-040	2/24/2020	9/16/2018	60.334	7/1/2022	70.94.162	2022
400-050	2/24/2020	1/19/2023	60.335	7/1/2022	70.94.200	2022
400-060	2/24/2020	11/25/2018	60.4	7/1/2022	70.94.221	2022
400-070	10/6/2016	1/19/2023	60.43	7/1/2022	70.94.905	2022
400-075	X	7/1/2016	60.46	7/1/2022	70.94.970	2022
400-105	2/24/2020	11/25/2018	60.48	7/1/2022	70.94.980	2022
400-107	6/2/1995	9/16/2018	60.49	7/1/2022		
400-110	9/29/2016	12/29/2012	60.7	7/1/2022		
400-113	4/29/2015	12/29/2012	60.8	7/1/2022		
400-114	X	12/29/2012	61, subpart M	7/1/2022		
400-171	2/24/2020	9/16/2018	63.6	7/1/2022		
400-200	10/3/2014	2/10/2005	63.7	7/1/2022		
400-205	6/2/1995	3/22/1991	63.8	7/1/2022		
400-560	4/29/2015	12/29/2012	63.9	7/1/2022		
400-720	10/6/2016	1/19/2023	63.10	7/1/2022		
400-820	11/7/2014	12/29/2012	63.455	7/1/2022		
401-200	1/2/2003	3/5/2016	63.7500	7/1/2022		
401-500	1/2/2003	10/17/2002	63.7510	7/1/2022		
401-510	1/2/2003	3/5/2016	63.7515	7/1/2022		
401-520	1/2/2003	11/4/1993	63.7520	7/1/2022		
401-530	1/2/2003	10/17/2002	63.7525	7/1/2022		
401-605	1/2/2003	11/4/1993	63.7540	7/1/2022		
401-610	1/2/2003	11/4/1993	63.7545	7/1/2022		
401-615	1/2/2003	10/17/2002	63.7550	7/1/2022		
401-620	1/2/2003	11/4/1993	64.3	7/1/2022		
401-625	1/2/2003	11/4/1993	64.4	7/1/2022		
401-630	1/2/2003	3/5/2016	64.6	7/1/2022		
401-640	1/2/2003	11/4/1993	64.7	7/1/2022		
401-645	1/2/2003	11/4/1993	64.8	7/1/2022		
401-650	1/2/2003	11/4/1993	64.9	7/1/2022		
401-705	1/2/2003	11/4/1993	68.36	7/1/2022		
401-710	1/2/2003	10/17/2002	70.6	7/1/2022		
401-720	1/2/2003	11/4/1993	82	7/1/2022		
401-722	1/2/2003	10/17/2002				
401-724	1/2/2003	3/5/2016				
401-730	1/2/2003	11/4/1993				
401-930	1/2/2003	1/30/1994				
455-100	X	11/25/2018				
455-120	X	12/31/2012				