

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

In the matter of the Compliance by **VAAGEN** )  
**BROS. LUMBER COMPANY COLVILLE, WA;** ) **Air Operating Permit**  
**LUMBER SAWMILL** with Section 70A.15.2260 ) **DRAFT** No.  
RCW, Operating Permits for Air Contaminant )  
Sources, and the applicable rules and )  
regulations of the Department of Ecology )

To: Vaagen Brothers Lumber Company Issuance Date: **TBD**  
565 W. 5th Ave. Effective Date: **DATE**, 2024  
Colville, WA 99114 Expiration Date: **DATE**, 2029

**Responsible Official:** Nathan Sarber  
**Facility Location:** 565 W Fifth Avenue, Colville, WA 99114  
**AQPID Number:** A0650012

**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, Vaagen Brothers Lumber Company, Colville 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 MONTH, 2024**.

**Prepared By:**  
\_\_\_\_\_  
Faye Bruno  
Air Quality Permit Engineering Specialist  
Eastern Region Air Quality Program

**Approved By:**  
\_\_\_\_\_  
Karin Baldwin  
Section Manager  
Eastern Region Air Quality Program

**Reviewed By:**  
\_\_\_\_\_  
Andrew Kruse, P.E.  
Environmental Engineer  
Eastern Region Air Quality Program

# Table of Contents

<b>AIR OPERATING PERMIT</b>	<b>1</b>
<b>LIST OF ABBREVIATIONS</b>	<b>3</b>
<b>1. STANDARD CONDITIONS</b>	<b>4</b>
1.1 PERMIT SHIELD	4
1.2 ENFORCEABILITY	4
1.3 PERMIT FEES	4
1.4 PERMIT CONTINUATION	4
1.5 PROPERTY RIGHTS	5
1.6 INSPECTION AND ENTRY	5
1.7 DUTY TO COMPLY	6
1.8 DUTY TO PROVIDE INFORMATION	6
1.9 DUTY TO SUPPLEMENT OR CORRECT APPLICATION	6
1.10 NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE	6
1.11 EXCESS EMISSIONS DUE TO AN EMERGENCY	7
1.12 UNAVOIDABLE EXCESS EMISSIONS	7
1.13 REPORTING	10
1.14 SEVERABILITY	14
1.15 ADMINISTRATIVE PERMIT AMENDMENTS	14
1.16 PERMIT ACTIONS	15
1.17 REOPENING FOR CAUSE	15
1.18 OFF-PERMIT CHANGES	15
1.19 CHANGES NOT REQUIRING PERMIT REVISIONS	16
1.20 NEW SOURCE REVIEW	18
1.21 REPLACEMENT OR SUBSTANTIAL ALTERATION OF EMISSION CONTROL TECHNOLOGY	18
1.22 OPERATIONAL FLEXIBILITY	18
1.23 PERMIT APPEALS	18
1.24 FEDERAL CHLOROFLUOROCARBONS (CFC) REQUIREMENTS – TITLE VI OF THE FCAA	19
1.25 REASONABLY AVAILABLE CONTROL TECHNOLOGY (RACT)	20
1.26 COMPLIANCE SCHEDULES	21
1.27 RECORD KEEPING	21
1.28 GENERAL OBLIGATION	21
1.29 PERMIT RENEWAL AND EXPIRATION	22
1.30 DEMOLITION AND RENOVATION (ASBESTOS)	22
<b>2. APPLICABLE REQUIREMENTS</b>	<b>22</b>
2.1 FACILITY WIDE	23
2.2 HOG FUEL BOILER	25
2.3 LUMBER DRYING KILN NO. 4	29
2.4 LUMBER DRYING KILNS NO. 5 AND NO. 6	29
2.5 PLANER BAGHOUSE	31
<b>3. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (MRRR)</b>	<b>32</b>
<b>4. INAPPLICABLE REQUIREMENTS</b>	<b>48</b>
<b>APPENDIX A: FEDERAL AND STATE REGULATION DATE REFERENCE LIST</b>	<b>49</b>

## 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 <sup>3</sup>	Cubic foot
gr/dscf	Grain per dry standard cubic foot
hr	Hour
MMBtu	Million British Thermal Units
MRRR	Monitoring, Recordkeeping, and Reporting Requirement
MVAC	Motor Vehicle Air Conditioner
N <sub>2</sub>	Nitrogen gas
NOC	Notice of Construction
NO <sub>x</sub>	Oxides of Nitrogen
NSPS	New Source Performance Standard
O <sub>2</sub>	Oxygen
O&M	Operation & Maintenance
P.E.	Professional Engineer
PM	Particulate Matter
PM-10	Particulate Matter with aerodynamic diameter ≤ 10 micrometers
ppm	Parts per million
PSD	Prevention of Significant Deterioration
QIP	Quality Improvement Plan
RACT	Reasonably Available Control Technology
RCW	Revised Code of Washington
RM	EPA Reference Method from 40 CFR Part 60, Appendix A
SERP	Source Emission Reduction Plan
scfm	Standard Cubic Feet per Minute
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
TAP	Toxic Air Pollutant
TPY	Tons per Year
TSP	Total Suspended Particulate
VOC	Volatile Organic Compound
WAC	Washington Administrative Code
yr	Year

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

Air Quality Program  
Department of Ecology  
4601 North Monroe  
Spokane, 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. 20AQ-E032, Approval Condition 11.c]

### **1.7 Duty to Comply**

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

[WAC 173-401-620(2)(a)], [Order No. 20AQ-E032, Approval Condition 11.i]

### **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-based<sup>1</sup> emission limitation under this permit was due to an emergency.<sup>2</sup> To do so, the permittee must demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that:

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

---

<sup>1</sup> 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.

<sup>2</sup> 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.

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.
- 1.13.1.5 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 1<sup>st</sup> through June 30<sup>th</sup>, and from July 1<sup>st</sup> through December 31<sup>st</sup>.

- 1.13.2.1 Semi-annual monitoring reports will be due no later than 45 days following the end of each 6 month period.
- 1.13.2.2 All instances of deviations from permit requirements must be clearly identified in such reports.
- 1.13.2.3 The report must include identification of all months during which no deviations occurred.
- 1.13.2.4 All required reports must be certified by a responsible official consistent with Condition 1.13.6.

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

### 1.13.3 Compliance Certifications

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

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

1.13.3.1 The certification must describe and include the following:

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

1.13.3.1.2 The current compliance status,

1.13.3.1.3 Whether compliance was continuous or intermittent, and

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

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

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

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

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

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

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

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

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

#### 1.13.4 Emissions Inventory

The permittee must submit an inventory of actual emissions from the source for each calendar year. The inventory must include segmented stack and fugitive emissions of TSP, PM-10, SO<sub>2</sub>, CO, NO<sub>x</sub>, lead, and VOC's, and must be submitted no later than **April 15<sup>th</sup>** 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 31<sup>st</sup> of each year for the previous calendar year.

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

[WAC 173-441]

#### 1.13.6 Submittals

Reports, test data, monitoring data, notifications, certifications, and applications (including requests for renewal) must be submitted to Ecology at the address included in this permit. Ecology may specify a different or additional submittal format in accordance with WAC 173-400-105(1), such as electronic submittal(s). Any application form, report, or compliance certification submitted to Ecology pursuant to this permit must contain

certification of truth, accuracy, and completeness by a responsible official. All certifications must state that *“based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete”*. The permittee must promptly, upon discovery, report to Ecology any material error or omission in these records, reports, plans or other documents.

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

#### **1.14 Severability**

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

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

#### **1.15 Administrative Permit Amendments**

1.15.1 An administrative permit amendment is a permit revision that:

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

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

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

[WAC 173-401-720]

### 1.16 Permit Actions

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

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

### 1.17 Reopening for Cause

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

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

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

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

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

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

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

[WAC 173-401-730]

### 1.18 Off-Permit Changes

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

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

[WAC 173-401-724]

## **1.19 Changes not Requiring Permit Revisions**

### **1.19.1 Section 502(b)(10) changes**

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

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



will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

#### 1.19.2 Changes related to Emissions trading under an emissions cap

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

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

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

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

## 1.20 New Source Review

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

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

## 1.21 Replacement or Substantial Alteration of Emission Control Technology

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

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

## 1.22 Operational Flexibility

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

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

[WAC 173-401-650]

## 1.23 Permit Appeals

### Your right to appeal

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

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

- File your notice of appeal and a copy of this Air Operating Permit with the PCHB (see filing information below). "Filing" means actual receipt by the PCHB during regular

business hours as defined in Chapter 371-08-305 WAC and -335. "Notice of appeal" is defined in Chapter 371-08-340 WA.

- Serve a copy of your notice of appeal and this Air Operating Permit on the Department of Ecology by mail, in person, or by email (see addresses below).

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

### Address and Location Information

#### Filing with the PCHB

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

#### Service on Ecology

##### Street Address:

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

##### Mailing Address:

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

##### E-Mail Address:

ecologyappeals@ecy.wa.gov

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

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

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

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

1.24.1.2 Equipment used during the maintenance, service, repair, or disposal must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

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

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

## **1.25 Reasonably Available Control Technology (RACT)**

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

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

## 1.26 Compliance Schedules

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

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

## 1.27 Record Keeping

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

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

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

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

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

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

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

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

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

## 1.28 General Obligation

Nothing in this permit will alter or affect the following:

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

[WAC 173-401-640(4)]

### 1.29 Permit Renewal and Expiration

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

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

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

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

### 1.30 Demolition and Renovation (asbestos)

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

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

## 2. 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 must be referenced for actual language.

**Testing Requirements**

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

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

**2.1 Facility Wide**

This section is applicable and enforceable with respect to all emission units source wide, including those emission units in Sections 2.2 through 2.6. Monitoring, recordkeeping, and reporting requirements in this section do not apply to insignificant emission units. Condition numbers denoted with an asterisk indicate that streamlining of a less stringent requirement has taken place and is described in section 17.0 of the Statement of Basis.

**Table 2.1 Applicable and Enforceable Requirements for All Emission Units**

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.1.1	WAC 173-400-040(2)	F	Visible emissions (except those due to the presence of uncombined water) must not exceed 20 percent opacity for more than three minutes in any one hour.	RM 9A	<b>3M</b>
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	<b>2M</b>
2.1.3	WAC 173-400-040(3)	S	Particulate matter must not be deposited beyond the property line in sufficient	None	<b>1M</b>

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited.		
2.1.4	WAC 173-400-040(9)(a)	F	The source must take reasonable precautions to prevent fugitive dust from becoming airborne and must maintain and operate the source to minimize emissions.	None	<b>2M, 4M</b>
2.1.5	WAC 173-400-040(4)(a)	F	Fugitive dust control measures must be taken to prevent fugitive emissions.	None	<b>2M, 4M</b>
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	<b>1M</b>
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	<b>1M</b>
2.1.8	WAC 173-400-040(8)	F	No person must conceal or mask an emission of an air contaminant	None	<b>None</b>
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	<b>None</b>



Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.1.10	WAC 173-400-205	F	Varying the rate of emission of a pollutant according to atmospheric conditions is prohibited, except as directed according to air pollution episode regulations.	None	None
2.1.11	RCW 70A.15.1070	S	Causing air pollution in violation of Chapter 70A.15 RCW is unlawful	None	None
2.1.12	WAC 173-425	F	Open burning is subject to restrictions.	None	None
2.1.13	WAC 173-400-040(1)(c)	F	All emissions units are required to use RACT.	None	None
2.1.14	WAC 173-400-040(7)	F	SO <sub>2</sub> ≤ 1000 ppm, dry basis (corrected to 7 percent O <sub>2</sub> for combustion sources) for 60 consecutive minutes.	RM6	5M

## 2.2 Hog Fuel Boiler

**Table 2.2 Applicable and Enforceable Requirements for Hog Boiler**

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.2.1	Order No. 20AQ-E032, Issued 9/16/20 Approval Condition 2)b)i.	S	Opacity as measured by the COMS must not exceed 10 percent over an hourly average (10 consecutive 6-minute averages).	None	8M
2.2.2	Order No. 20AQ-E032, Issued 9/16/20 Approval Condition 2)b)ii.	S	Opacity as measured by the COMS must not exceed 20% over a 6-minute average.	None	8M
2.2.3	Order No. 20AQ-E032, Issued 9/16/20 Approval Condition 2)c)i.	S	Visible emissions from the ESP stack must not exceed 20 percent opacity for more than 3 minutes in any one	RM 9A	3M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
			hour, as measured by Method 9A. Applies at all times, including during soot blowing and grate cleaning.		
2.2.4	Order No. 20AQ-E032, Issued 9/16/20 Approval Condition 2)c)ii.	S	Visible emissions from the ESP stack must not exceed 20 percent during any six-minute averaging period, as measured by Method 9. Always applies, including during soot blowing and grate cleaning.	RM 9	<b>3M</b>
2.2.5	WAC 173-400-050(1)	F	Combustion and incineration units must meet all applicable provisions of WAC 173-400-040 and emissions of particulate material shall not exceed 0.2 grain/dscf of exhaust gas.	RM 5	<b>5M, 6M, 8M, 9M, 11M</b>
2.2.6	Order No. 20AQ-E032, Issued 9/16/20 Approval Condition 2)a).	S	PM emissions must be < 0.030 grains per dry standard cubic foot (7 percent O <sub>2</sub> ) during all modes of boiler operation.	RM 5	<b>6M, 9M, 11M</b>
2.2.7	Order No. 20AQ-E032, Issued 9/16/20 Approval Condition 2)d).	S	Filterable particulate matter (RM5 front-half only) emissions must not exceed 50 tons/year.	RM 5	<b>6M, 9M, 11M</b>
2.2.8	Order No. 20AQ-E032, Issued 9/16/20 Approval Condition 1)a).	S	Boiler steam generation rate must not exceed 60,000 pounds per hour (monthly average).	None	<b>9M</b>
2.2.9	Order No. 20AQ-E032, Issued 9/16/20 Approval Condition 10	S	The electrostatic precipitator (ESP), PPC Industries 4500 must be online with both fields operating at all times that the boiler is operated.	None	<b>9M</b>

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
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	<b>4M, 10M</b>
2.2.11	Order No. 20AQ-E032, Issued 9/16/20 Approval Condition 6)a).	S	O&M manual must be kept updated.	None	<b>10M</b>
2.2.12	Order No. 20AQ-E032, Issued 9/16/20 Approval Condition 1)b). Approval Condition 3	S	The permittee must comply with the provisions of its SERP.	None	<b>None</b>
2.2.13	Order No. 20AQ-E032, Issued 9/16/20 Approval Condition 11)d)	S	Legible copies of the Approval Order and O&M Manual must be in the working vicinity and available to employees in direct operation of the boiler.	None	<b>None</b>
2.2.14	Order No. 20AQ-E032, Issued 9/16/20 Approval Condition 11)e)	S	The boiler and associated equipment must be operated in compliance with the O&M manual and NOC application.	None	<b>4M</b>
2.2.15	40 CFR 64.7(b)	F	The permittee must maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.	None	<b>4M</b>
2.2.16	40 CFR 63.7500 (a)(l); 63.7515 (d); 63.7540 (a)(10, 12)	F	Boiler tune-up.	None	<b>15M</b>
2.2.17	40 CFR 63.7540 (a)(1 O)(vi)(A)-(C)	F	Maintain on-site report.	None	<b>15M</b>
2.2.18	40 CFR 63.7500 (a)(1), Table 2 (1) and (7); 63.7510 (a)(l), (c), (d)	F	Emission limits.	None	<b>15M</b>

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.2.19	40 CFR 63.7510 (e); 63.7515 (a)	F	Performance testing for CO and PM every three years.	None	15M
2.2.20	40 CFR 63.7545 (d)	F	Notification of intent.	None	15M
2.2.21	40 CFR 63.7520 (a); Subpart A, 63.7 (c)	F	Site-specific stack test plan.	None	15M
2.2.22	40 CFR 63.7525 (a)	F	The source must maintain the required CEMS (installed on November 3, 2014) in proper working order per the manufacturer's instructions.	None	15M
2.2.23	40 CFR 63.7515 (f)	F	Report performance test results.	None	15M
2.2.24	40 CFR 63.7545 (e)	F	Notification of compliance status.	None	15M
2.2.25	40 CFR 63.7500 (a)(2), 63.7540 (a), Table 4 (4)(a)	F	Maintain opacity to less than or equal to 1 0% on a daily block average basis.	None	3M
2.2.26	40 CFR 63.7525 (a), Table 7 (4)	F	Operate an oxygen trim system with the oxygen level set no lower than the lowest hourly average oxygen concentration measured during the most recent CO performance test as the operating limit for oxygen according to Table 7 to this subpart.	None	15M
2.2.27	40 CFR 63.7550 (b)	F	Semi-annual compliance reports.	None	15M
2.2.28	40 CFR 63.6(e)(3)	F	Startup, Shutdown, and Malfunction Plan.	None	16M

**2.3 Lumber Drying Kiln No. 4**

**TABLE 2.3 Applicable and Enforceable Requirements for Drying Kiln No. 4**

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

**2.4 Lumber Drying Kilns No. 5 and No. 6**

**TABLE 2.4 Applicable and Enforceable Requirements for Drying Kilns No 5 and No 6**

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.4.1	Order No. 15AQ-E601, Approval Condition 2.1	F	Opacity from the dry kiln exhaust must not exceed 10 percent opacity over a six-minute time interval	RM 9	<b>14M</b>

2.4.2	Order No. 15AQ-E601, Approval Condition 2.2	F	No visible emissions from the dry kiln must be allowed beyond the property line	RM 22	<b>14M</b>
2.4.3	Order No. 15AQ-E601, Approval Condition 2.3	F	PM-10 emissions from the dry kiln must not exceed 0.1 gr/dscf	None	<b>14M</b>
2.4.4	Order No. 15AQ-E601, Approval Condition 2.4	F	Dry kiln instrumentation must be provided as specified in the O&M manual	None	<b>None</b>
2.4.5	Order No. 15AQ-E601, Approval Condition 3.1	F	No heating energy source other than steam heat must be used with the new dry kiln	None	<b>14M</b>
2.4.6	Order No. 15AQ-E601, Approval Condition 3.2	F	Automatic energy management of temperature and relative humidity must be used during operation of the new dry kiln	None	<b>14M</b>
2.4.7	Order No. 15AQ-E601, Approval Condition 4	F	A site specific O&M manual for the two Wellons' kilns No.5 and 6 shall be developed and followed. The O&M manual shall be reviewed annually and updated to reflect any modifications or changes.	None	<b>14M</b>
2.4.8	Order No. 15AQ-E601, Approval Condition 6.1	F	Excess emissions shall be reported to Ecology in accordance with Washington Administrative Code (WAC) 173-400-107 through 173-400-109.	None	<b>None</b>
2.4.9	Order No. 15AQ-E601, Approval Condition 7	F	Performance testing will be performed at such times and frequencies as	Various	<b>None</b>

			specified in this approval Order and at other times in accordance with WAC 173-400-1 05(4).		
2.4.10	Order No. 15AQ-E601, Approval Condition 8.4	F	Legible copies of Order No. 15AQ-E601 will be available to employees in direct operation of the dry kiln.	None	None
2.4.11	Order No. 15AQ-E601, Approval Condition 8.5	F	Operation of all equipment will be conducted in accordance with good air pollution control practices as well as all data and specifications submitted as part of the NOC application unless otherwise approved in writing by Ecology.	None	4M

**2.5 Planer Baghouse**

**TABLE 2.5 Applicable and Enforceable Requirements for the Planer Baghouse**

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.5.1	Order No. 04AQ-E137, Approval Condition 1	S	The planer shall not be operated without the baghouse control system also operating.	None	13M
2.5.2	Order No. 04AQ-E137, Approval Condition 2.1	S	Visible emissions from the baghouse exhaust shall not exceed 5 percent over a six-minute average.	RM 9	3M
2.5.3	Order No. 04AQ-E137, Approval Condition 2.2	S	The PM-10 emission concentration from the baghouse exhaust shall not exceed 0.005 gr/dscf of exhaust gas, one-hour average.	RM 5, RM 202	3M, 13M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.5.4	Order No. 04AQ-E137, Approval Condition 6.3	S	Legible copies of this Approval Order shall be available to employees in direct operation of the equipment and be available for review upon request by Ecology.	None	<b>None</b>
2.5.5	Order No. 04AQ-E137, Approval Condition 6.4	S	Operation of all equipment shall be conducted in accordance with good air pollution control practices as well as all data and specifications submitted as part of the NOC application unless otherwise approved in writing by Ecology.	None	<b>4M</b>

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

---

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

**GENERAL**

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

- 1M.** The permittee must maintain records of all complaints received. Ecology must be notified within three working days of receipt of any complaints. The permittee must address and respond to all complaints within three working days of receipt of the complaint. The recordkeeping must include the following with regard to the complaint and the associated deviation:
- 1) A record of all written complaints, complaints received by telephone or complaints received in person.
  - 2) Time, date, and duration of the deviation.
  - 3) Cause of the deviation.



- 4) Estimate of excess emissions and magnitude of deviation.
- 5) Corrective action taken.
- 6) The results of the corrective action must be reported as part of the monthly deviation report.

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

**2M.** The following must apply generally, facility wide:

- 1) **Monitoring:** At least weekly, as well as any time visible emissions are observed, the permittee must perform opacity surveys of the facility during daylight hours. The surveys must be conducted while the facility is in operation, and where the sun is not directly in the observer's eyes. The survey must include observation for any visible emissions, including fugitive emissions.
  - a) Observer certification for plume evaluation is not required, but the observer will be trained in the general procedures for determining the presence of visible emissions (i.e., effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, observer position relative to source and sun, and the presence of uncombined water).
  - b) The survey must consist of a visual scan of the facility and the direct observation of each emission point or stack.
  - c) If visible emissions are observed, the permittee must identify the source and verify that equipment is operating normally, and that reasonable precautions are being taken to control any fugitive dust. If equipment is not operating normally or reasonable precautions are not being taken to control fugitive dust, the permittee must take prompt corrective action.
- 2) **Recordkeeping:** Records of each survey must include the date, observer name, the weather, and identification of any points from which visible emissions were observed. The permittee must record any action taken under a)(3), including a description any corrective action taken.
- 3) **Reporting:** Monthly deviation reports required by Standard Condition 1.13.1 must include a description of any visible emissions, and any corrective action taken under 2M (1)(c).

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

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

- 1) At least monthly, or whenever excess visible emissions are observed, the permittee must observe points of visible and PM emissions from emission units and activities to which opacity and/or particulate standards apply. The survey must also be conducted when visible emissions are observed by facility personnel and reported to personnel responsible for environmental compliance. Facility personnel in general must be made aware of their responsibility to report visible emissions. Each survey must be performed as follows:
  - a) The survey must be conducted during daylight hours from a location with a clear view of the emission point and where the sun is as close as possible to being directly behind the

observer. The observer's location must be at least 15 feet but not more than one quarter mile from the source.

- b) The survey must be conducted while the facility process associated with the emission point is in operation.
- c) The observer will be trained in the general procedures for determining the presence of visible emissions (i.e., effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, observer position relative to source and sun, and the presence of uncombined water).
- d) The survey must consist of a minimum of a 15-second visual observation of each stack or emission point to identify any visible emissions other than those due to uncombined water.
- e) Records must be made of each observation, including at least: the emission points observed, the name of the observer, the date and time of the observation, the emission points observed, weather conditions and the presence or absence of visible emissions.
- f) If visible emissions are observed to be zero, no further action is required.
- g) If visible emissions are observed—as soon as possible, but no later than 24 hours after the observation, the permittee must verify and certify that:
  - i) The emissions are not the result of equipment malfunction, and the equipment from which the emissions are released is performing its normal, designed function.
  - ii) Air pollution control equipment, if any, is being operated in accordance with normal operating procedures.
  - iii) For fugitive emissions, reasonable precautions are being taken to minimize emissions.
- h) If any of the above are not being met, corrective action must be taken as soon as possible, but no later than 72 hours from the initial observation.
- i) If or when 1)g)i., ii., and iii. are being met:
  - i) If no visible emissions are observed, no further action is required.
  - ii) If visible emissions are observed, the permittee must within 24 hours, perform an RM 9 or Ecology Method 9A (whichever is applicable) test on the source of the emissions. Only personnel certified to perform RM9 in accordance with EPA guidelines must perform the test. Testing must consist of opacity readings at 15-second intervals over a minimum of six consecutive minutes (24 consecutive readings). If any reading exceeds the standard, observations must continue for a total of 60 minutes or until a violation is documented.
    - a. If visible emissions do not exceed the applicable standard, no further action is required.

- b. If visible emissions exceed the applicable standard, the permittee must initiate appropriate corrective action to address the problem and prevent further violations within 24 hours.
          - c. Once corrective action has been taken, the permittee must perform, or have performed, an RM9 or Method 9A test to demonstrate a return to compliance. The results of the test must be submitted to Ecology within two working days of the test.
- 2) Recordkeeping: The permittee must maintain the following records for at least five years:
  - a) A list of all facility personnel trained per 1)c), and a list of all facility personnel with current RM9 certification.
  - b) For each exceedance of the opacity standard identified under 1)i)ii)b. above:
    - i.) The date and time the exceedance was identified.
    - ii.) A description of the exceedance.
    - iii.) A description of corrective action taken.
    - iv.) Copies of all RM9 or Method 9A observations documenting an exceedance or the re-establishment of normal operations.
- 3) Reporting: Reports of all opacity exceedances must be included in the monthly deviation report required by Standard Condition 1.13.1.

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

#### **4M. Maintaining Operation and Maintenance Manuals and Records**

- 1) 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.
- 2) 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 30 days.

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

- 5M.** The permittee must determine the sulfur content of fuels used, except that no determination is needed for hog fuel<sup>1</sup>, natural gas, propane (LPG) or diesel fuel with less than two percent sulfur by weight. The permittee may rely on information from fuel suppliers or generally published information on the sulfur content of other fuels. Use of any fuel with sulfur content greater than two percent by weight may require a reference method source test during the use of that fuel. The permittee may certify compliance with Condition 2.1.14 if no fuels with sulfur content greater than two percent by weight are combusted.

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

### **HOGGED FUEL BOILER**

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

- 1) Testing must be conducted for the following pollutants:

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

Ecology may require testing for additional pollutants.

- 2) The testing must consist of a minimum of three runs, and they must be conducted during normal operation. For purposes of evaluating compliance with the grain loading emission limit, the results from the test runs must be weight averaged according to the amount of time spent performing each function.

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

- i.) The minimum must be 90 percent of the maximum design rated capacity of the boiler,

or

- ii.) The maximum achievable steam production rate. The maximum achievable steam production rate must be calculated as the hourly average steam production rate during the week of highest total steam production rate in the last two years. If this

---

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

approach is taken, documentation establishing the minimum required hourly steam rate for testing must be included in the test plan.

- b) All testing must be reflective of normal source operation. The boiler must be operated and controlled by the normal shift boiler operator during the period when the testers are on site and during actual testing. Any person, other than the boiler operator or boiler supervisor, including any consultant, boiler representative, or tester, directing the operation of the boiler in any way during the test period will immediately invalidate the testing for purposes of Ecology's evaluation. No controls or monitors other than those permanently installed and utilized during the normal course of operation will be used to direct operation of the boiler during the testing period.
- c) Operating parameters including, but not limited to the following, must be recorded at least once for each run of the source testing; stack exhaust temperature, steam production rate, primary and secondary ESP voltage and current, and multiclone differential pressure. The data collected must be submitted as part of the test report. Continuous opacity monitor data recorded during the source test must be included in the report.
- d) Opacity observations using RM 9 must be conducted for a minimum of a six-minute observation to determine compliance. Observation may take one-hour period or more during the source testing. A copy of the RM 9 test form must be submitted as part of the test report.

[Order No. 20AQ-E032, Approval Condition 4], [WAC 173-401-615(1)(b) ], [WAC 173-401-630(1)], [WAC 173-400-105] (This MRRR includes gap filling)

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

- 1) Monitoring Operation:
  - a) Except for monitoring malfunctions<sup>1</sup>, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee must conduct all monitoring at all times that the pollutant-specific emissions unit is operating.
  - b) Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities must not be used for CAM purposes, including data averages and calculations, or fulfilling a minimum data availability requirement.
  - c) Proper maintenance: At all times, the permittee must maintain the monitoring equipment, including maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b)]

---

<sup>1</sup> A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

- d) Minimum data availability: The permittee must recover valid monitoring data for at least 90 percent of the time the emission unit is required to be monitored each month. [40 CFR 64.6(c)(4)]
  - e) The permittee must use all data collected during all other periods in assessing the operation of the control device and associated control system. [40 CFR 64.7(c)]
- 2) The Semi-Annual Monitoring Report required by Standard Condition 1.13.2 must include the following:
- a) Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken.
  - b) Summary information on the number, duration, and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks).
  - c) A description of any actions taken during the reporting period to implement any Quality Improvement Plans (QIPs) in effect.
  - d) Any notice required by 40 CFR 64.7(e) of the failure of CAM monitoring to indicate an excursion or exceedance during a period in which the permittee identified a failure to meet an emission limitation.

[40 CFR 64.9(a)(2)(i), (ii), (iii) and 64.7(e)]

- 3) The Annual Compliance Certification required by Standard Condition 1.13.3 must identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance has occurred. [ 40 CFR 70.6(c)(5)(iii)(C)]
- 4) CAM Recordkeeping:
- a) The permittee must maintain the following records of monitoring data, monitor performance data, corrective actions taken, any written QIPs required as well as any activities undertaken to implement a QIP. In addition, any other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Records must be maintained for a period of five years. [40 CFR 64.9(b)(1)]
  - b) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review and does not conflict with other applicable recordkeeping requirements. [40 CFR 64.9(b)]

**8M.** Continuous Opacity Monitoring System:

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

CEMS must be operated using quality assurance procedures conforming to EPA 34011-86-010, Recommended Quality Assurance Procedures of Opacity CEMS.

- 2) Recordkeeping: The permittee must maintain the following records related to the QA Plan and COMS. Such records must be retained for a period of at least five years and must be well organized and readily accessible for inspection by Ecology personnel:
  - a) A copy of the QA Plan,
  - b) Records of all quality assurance procedures performed for a period of five years, and
  - c) A description of any actions taken during the reporting period to implement any Quality Improvement Plan (QIPs) in effect.
- 3) Reporting: Excess emission events must be reported as required by Standard Condition 1.13.1.

[Order No. 20AQ-E032, Approval Conditions, 3.b), 8)a)ii, 8)a)v, 8)a)vii, 9)a)], [WAC 173-401-630(1) ]  
(This MRRR includes gap filling)

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

- 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.
  - b) Equipment to measure differential pressure on the multi clone (installed in accordance with CAM -7M).
  - c) Continuous Opacity Monitoring System on the boiler exhaust stack.
  - d) Equipment to monitor primary and secondary voltage and primary and secondary current on each of the electrostatic precipitator transformer rectifier (T/R) sets.
  - e) All ESP monitoring equipment and instrumentation as described in the O&M manual.
- 2) The following recordkeeping specific to the hogged fuel boiler must be retained for a period of five years, and kept in an organized, legible manner readily available for inspection by Ecology personnel:
  - a) Records of steam production. The permittee must record the total monthly hours of operation and total monthly steam production of the hog fuel boiler.
  - b) ESP primary and secondary voltage and primary and secondary amperage for each T/R set must be recorded at least once per 8-hour shift.
  - c) Maximum achievable steam rate production records.
  - d) Records of testing and inspections.

- e) Records of deviation reports submitted in accordance with Standard Condition 1.13.1.
- f) Chart recorder readings or computer file readings from the COMS.
- g) O&M manual and maintenance records.
- h) Regular maintenance and repair records.

3) Reporting:

- a) All instances when the hog fuel boiler is operated without both fields of the ESP online must be included in the monthly deviation report required by Standard Condition 1.13.1.
- b) The annual emission inventory required by Standard Condition 1.13.4 must include the number of hours and total steam production while operating the hog fuel boiler.

[Order No. 20AQ-E032, Approval Conditions 1, 3, 4)m), 5)b), 8)a)i, 8)a)iii through 8)a)vi] [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 gap filling)

**10M.** The permittee must maintain and follow an O&M manual for the ESP controlling emissions from 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. Emissions that result from failure to follow the requirements of the O&M manual or manufacturer's instruction may be considered proof that the equipment was not properly operated, maintained and monitored. The following minimum information must be included in the manual:

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

[Order No. 20AQ-E032, Approval Conditions 6)a)i – 6)a)v]

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

- 1) The permittee must install and operate the following:
  - a) Equipment must be provided that monitors and displays electrostatic precipitator secondary voltage in kilovolts for both transformer/rectifier sets (T/R 1 and T/R 2).
  - b) Equipment to monitor differential pressure across the multi clone. The instrumentation must display the differential pressure in inches of water column.



- 2) The permittee must conduct monitoring as follows:
- a) At least once per day, the permittee must evaluate the data obtained through recordkeeping as described in i) and ii) below, answer the following questions and take the actions specified:
    - i) Has the daily average secondary voltage been below either of the following trigger limits for two consecutive days?
      - a. For T/R 1—20 kV.
      - b. For T/R 2—30 kV.
    - ii) Has the daily average secondary voltage been below either of the following trigger limits for two consecutive days?
      - a. For T/R 1 —20 kV.
      - b. For T/R 2 —20 kV.
    - iii) Is the two-day average multiclone differential pressure greater than 4" w.c. or less than 1" w.c.?
  - b) If the answer to all three questions posed under a) above is "no", corrective action is not required under CAM.
  - c) If the answer to the question posed by 2)a)i) above is "yes", actions consistent with the following must be taken:
    - i) Facility personnel will monitor ESP operation more closely.
    - ii) Facility personnel will immediately initiate actions to ensure proper operation of the rapping, purge air and insulator cleaning systems, and the multiclone, as well as other actions as deemed appropriate.
    - iii) In the event that the daily average ESP secondary voltages remain below the values established in 2)a)i), for seven consecutive days despite the actions taken, actions as outlined under 2)d)i) must be taken.
  - d) If the answer to the question posed by 2)a)ii) above is "yes", actions 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 screen for possible problems, checking bottom hoppers for buildup, checking

ESP electrical systems, increasing the sonic blowdown, turning on the bottom vibrator, dumping the T/R set for an appropriate amount of time, obtaining manufacturer advice, and system shutdown and internal inspection along with appropriate subsequent maintenance and/or repair.

- e) If the answer to the question posed by 2)a)iii) above is “yes”, the multiclone must be internally inspected during the next scheduled plant shutdown, and corrective actions must be taken as necessary to return the equipment to normal operation.
- 3) The permittee must conduct recordkeeping in accordance with the following:
- a) At least once every eight hours, the permittee must record the values for ESP secondary voltage for both T/R 1 and T/R 2 and multiclone differential pressure. In recording ESP secondary voltage, facility personnel should watch the meter for approximately one minute and record the highest observed value. The purpose of this is to avoid recording the voltage immediately after the ESP sparks.
  - b) At least once per day, the daily average of the secondary voltage for each of the T/R sets and the differential pressure across the multiclone must be calculated by computing the mean of the three-recorded values.
  - c) In the event that actions as outlined in either 2)c), 2)d) or 2)e) are required, the permittee must maintain records documenting the 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.
- 4) The permittee must conduct reporting in accordance with the following:
- a) In the event that corrective action as outlined under 2)d) above is required, 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 (if any), a description of the corrective action(s) taken, and the results of the corrective action. In the event that corrective action as outlined under 2)e) is required, the permittee must notify Ecology of the next expected plant shutdown date and must submit a report following shutdown outlining the corrective actions taken.
  - b) Upon discovery that the monitoring as designed is insufficient to provide indications of all deviations, the permittee must notify Ecology of the monitoring deficiency.

[40 CFR 64.3, 64.4(d), 64.7(d), 64.7(e), 64.8] (This MRRR includes gap filling)

#### **Dry Kiln No. 4**

- 12M.** Records for Dry Kiln No. 4 shall be retained for at least five years, kept up to date, well organized and easily accessible to Ecology personnel upon request. Records shall include annual lumber throughput by species as well as total Dry Kiln No. 4 throughput.

[Order No. 05AQ-E139 2<sup>nd</sup> Amendment, Approval Condition 2]

**PLANER**

**13M.** The following conditions must apply to monitoring, recordkeeping and reporting required for the planer:

- 1) **Monitoring:** A gauge to monitor the pressure difference across the baghouse filter must be installed and maintained. The gauge must include an easily accessible display of the pressure drop in inches of water column.
- 2) **Recordkeeping:** the following recordkeeping for the new planer must be retained for at least five years, kept up to date, well organized and easily available upon request by Ecology personnel:
  - a) Manufacturer's equipment specifications and unit identification for the planer and baghouse.
  - b) The pressure drop (inches water column) across the baghouse must be recorded daily.
  - c) Total annual lumber throughput.
- 3) **Reporting:** All instances when the planer is operated without the planer baghouse operating must be included in the monthly deviation report required by Standard Condition 1.13.1.

[Order No. 04AQ-E137, Approval Conditions 3, 4, 5]

**Dry Kilns No. 5 and No. 6**

**14M.** The following conditions must apply to monitoring, recordkeeping and reporting required for Dry Kiln No. 5 and No. 6:

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

[Order No. 15AQ-E601, Approval Condition 5]

- 2) Performance testing must be performed at such times and frequencies as specified in this approval Order and at other times in accordance with WAC 173-400-105(4). Any changes to a required test frequency must be requested by the permittee and approved by Ecology in writing.
- 3) Test Methods: The sampling methods identified below must be used:
  - a) Exhaust Flow: EPA Methods 1-4
  - b) Volatile Organic Compounds: EPA Method 25A or 18 or 320
  - c) Methanol: NCASI Method 105
  - d) Ethanol: NCASI Method 105
  - e) Formaldehyde: NCASI Method 105
  - f) Acetaldehyde: NCASI Method 105
  - g) Acrolein: NCASI Method 105
  - h) Propionaldehyde: NCASI Method 105
  - i) Acetic Acid: EPA Method 18
  - j) Monoterpenes: EPA Method 18
  - k) Particulate Matter: EPA Methods 5/202
- 4) Test Duration: The test duration must be as necessary to yield representative results. In some cases, multiple test runs will be conducted over the drying cycle.
- 5) A written test protocol, including a description of the equipment to be tested, the process and control device operating information to be collected, and the sampling and analytical method(s) proposed, must be submitted to Ecology at least 30-calendar days prior to the start of any performance test.
- 6) Test results must be submitted to Ecology within 60-days of the last day of testing.
- 7) During testing, the process must be operated at a minimum of ninety percent of rated capacity for equipment. Operation of the process during testing outside of the specified range may be proposed but may result in an operational restriction.
- 8) Plant process equipment must be operated and controlled by normal plant operators during the period when the performance testers are on-site to conduct testing and during actual testing.
- 9) The permittee must provide testing and sampling facilities in accordance with the requirements in 40 CFR 60.8(e).
- 10) If the permittee is unable to conduct any performance test as scheduled, Ecology must be notified at least 24-hours before the test.

- 11) The following Quality Assurance Measures must be utilized unless otherwise approved by Ecology in advance of the testing:
- a) The lumber used for the source test must be preserved in a manner to assure the freshness of the lumber. The lumber must be wrapped in plastic or other material to prevent off-gassing or contamination during storage.
  - b) The logs from which lumber for the testing is taken must be newly arrived at the drying site.
  - c) The lumber must be maintained below 45°F if the lumber is stored for more than two but less than seven days prior to the commencement of testing.
  - d) The lumber must be maintained below 10°F if stored for seven or more days prior to testing.
  - e) The ends of each test board must be trimmed prior to testing.
  - f) The kiln must be operated as close as practical to the dominant drying schedule (dry bulb and wet bulb temperatures) at the facility for the wood species being tested.
  - g) The wood samples must be dried to a moisture content at or below the moisture content targeted by the subject facility.
- 12) Operating Parameters during Testing. All recorded production and operating parameters must be documented in the test results report. The following operating and production parameters, at a minimum, must be recorded during emission testing:
- a) Test kiln details including kiln dimensions, kiln air velocity, and heating method.
  - b) Sample size (board feet), sample initial weight, and lumber dimensions (e.g., 2 by 4, 4 by 8, ...).
  - c) Drying time.
  - d) Wood moisture content (initial and final).
  - e) Temperature (continuously monitored and recorded wet bulb and dry bulb temperatures).
  - f) Lumber information including percentage of heartwood vs. sapwood, ring count, percentage of face area that consists of knots, etc.
  - g) Tree information: coastal or inland, age, approximate date harvested, if log was stored in water.
  - h) Any interruptions in kiln operation.

[17M, 2-12 = Order No. 15AQ-E601, Approval Conditions 7.1 – 7.11]

### **Boiler Mact Standards**

**15M.** The following conditions must apply to the Hogged-Fuel Boiler per 40 CFR, Subpart DDDDD:

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

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

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

**16M.** The following conditions will apply to the Facility per 40 CFR, 63.6(e)(3):

- 1) All information necessary, including actions taken, to demonstrate conformance with the affected source's startup, shutdown, and malfunction plan when all actions taken during periods of startup or shutdown, and malfunction are consistent with the procedures specified in such plan. Further, when the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards, and corrective actions to restore malfunctioning process, air pollution control, and monitoring equipment to its normal or usual manner of operation must be recorded. The information needed to demonstrate conformance with the startup, shutdown, and malfunction plan may be recorded using a "checklist," or some other effective form of recordkeeping, in order to minimize the recordkeeping burden for conforming events:

- a) The owner or operator of an affected source must develop a written startup, shutdown, and malfunction plan. The plan must describe in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction; and a program of corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with the relevant standard. The startup, shutdown, and malfunction plan does not need to address any scenario that would not cause the source to exceed an applicable emission limitation in the relevant standard. The owner or operator must develop this plan by the source's compliance date for that relevant standard.

#### 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
DE98AQ-E132	Natural Gas Boiler	NG Boiler has been permanently dismantled.
20AQ-E032, Condition 6)b)	Opacity CEMS Quality Assurance Procedures	The ESP was installed in 1997 and the QA/QC plan submitted in 1998. No subsequent monitoring conditions are included in this condition.
20AQ-E032, Condition 6)c)	ESP Ash Disposal Plan	The Ash Disposal plan was submitted to Ecology in 1998. The language related to the submittal is obsolete.
20AQ-E032, Condition 7)	Compliance Schedule	All conditions have been met and the deadlines are past. The conditions are obsolete.
40 CFR 52.2	Prevention of Significant Deterioration (PSD)	Applicant is not currently subject to PSD.
40 CFR 60	New Source Performance Standards (NSPS)	Applicant's facility does not contain specified sources.
40 CFR 61	National Emission Standards for Hazardous Air Pollutants (NESHAPS)	Applicant's facility does not contain, or process specified toxic chemicals.
40 CFR 82 (excl Sub E & F)	Stratospheric Ozone Protection	Applicant's facility does not produce or consume specified sources



**Appendix A: Federal and State Regulation Date Reference List**

WAC	F	S	CFR	F	RCW	S
425	X	3/13/2000	52.33	7/1/2023	70A.15.1070	2022
441	X	3/12/2022	60.11	7/1/2023	70A.15.2210	2022
460	X	11/22/2019	60.12	7/1/2023	70A.15.2220	2022
400-035	X	9/16/2018	60.332	7/1/2023	70A.15.2230	2022
400-040	2/24/2020	9/16/2018	60.334	7/1/2023	70A.15.2270	2022
400-050	2/24/2020	1/19/2023	60.335	7/1/2023	70A.15.2500	2022
400-060	2/24/2020	11/25/2018	60.4	7/1/2023	70A.15.2530	2022
400-070	10/6/2016	1/19/2023	60.43	7/1/2023	70A.15.6410	2022
400-075	X	7/1/2016	60.46	7/1/2023	70A.15.6420	2022
400-105	2/24/2020	11/25/2018	60.48	7/1/2023		
400-107	6/2/1995	9/16/2018	60.49	7/1/2023		
400-110	9/29/2016	12/29/2012	60.7	7/1/2023		
400-113	4/29/2015	12/29/2012	60.8	7/1/2023		
400-114	X	12/29/2012	61, subpart M	7/1/2023		
400-171	2/24/2020	9/16/2018	63.6	7/1/2023		
400-200	10/3/2014	2/10/2005	63.7	7/1/2023		
400-205	6/2/1995	3/22/1991	63.8	7/1/2023		
400-560	4/29/2015	12/29/2012	63.9	7/1/2023		
400-720	10/6/2016	1/19/2023	63.10	7/1/2023		
400-820	11/7/2014	12/29/2012	63.455	7/1/2023		
401-200	1/2/2003	3/5/2016	63.7500	7/1/2023		
401-500	1/2/2003	10/17/2002	63.7510	7/1/2023		
401-510	1/2/2003	3/5/2016	63.7515	7/1/2023		
401-520	1/2/2003	11/4/1993	63.7520	7/1/2023		

WAC	F	S	CFR	F	RCW	S
401-530	1/2/2003	10/17/2002	63.7525	7/1/2023		
401-605	1/2/2003	11/4/1993	63.7540	7/1/2023		
401-610	1/2/2003	11/4/1993	63.7545	7/1/2023		
401-615	1/2/2003	10/17/2002	63.7550	7/1/2023		
401-620	1/2/2003	11/4/1993	64.3	7/1/2023		
401-625	1/2/2003	11/4/1993	64.4	7/1/2023		
401-630	1/2/2003	3/5/2016	64.6	7/1/2023		
401-640	1/2/2003	11/4/1993	64.7	7/1/2023		
401-645	1/2/2003	11/4/1993	64.8	7/1/2023		
401-650	1/2/2003	11/4/1993	64.9	7/1/2023		
401-705	1/2/2003	11/4/1993	68.36	7/1/2023		
401-710	1/2/2003	10/17/2002	70.6	7/1/2023		
401-720	1/2/2003	11/4/1993	82	7/1/2023		
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				