

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

IN THE MATTER OF APPROVING A) Proposed Decision Regarding
NEW CONTAMINANT SOURCE FOR) Notice of Construction ORDER
OROVILLE REMAN AND RELOAD, INC.) No. 05AQ-C022, First Revision

To: **Oroville Reman & Reload, Inc.**
PO Box 1610
Oroville, Washington 98844

1.0 PROJECT SUMMARY

A lumber mill served by rail and truck transportation has been located since 1981 at 301 9th Avenue, Oroville, within Section 28, Township 40 North, Range 27 East, W.M., Okanogan County. The mill re-manufactures and reloads lumber products. Products produced by the mill, which vary over time in response to market conditions, now include boards supplied to retailers plus byproducts such as sawdust and shavings. In the past the mill has produced pallets and bins for the fruit industry. The facility is divided into “Plant 1” and “Plant 2”. Plant 1 manufactures the majority of the source’s products, while Plant 2 primarily processes short boards using trim saws.

On November 7, 2005, the Department of Ecology (Ecology) issued Notice of Construction Order No. 05AQ-C022 to Oroville Reman and Reload, Inc., current action includes bringing air quality permitting up to date for the following mill equipment installed at the facility from 1992 to 2004: four rip saws, five chop saws, one molder, one trim saw, one paint booth, one drying tunnel, and associated air pollution control equipment. Order No. 05AQ-C022 also prescribed The current action also includes controls for previously existing activities, such as loading wood waste into trucks.

On August 5, 2008 and October 28, 2008, Oroville Reman and Reload, Inc. filed requests with Ecology to revise Order No. 05AQ-C022 as follows:

1. Allow the use of a cyclone, in place of a baghouse, to control emissions from shortboard processing;
2. Delete all conditions related to the paint booth and drying tunnel because a paint booth and drying tunnel are no longer installed at the source;
3. Increase total production from 4800 to 10,000 tons per year of wood waste;

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4. Revise several conditions limiting visible emissions, such that the associated opacity limits are greater than 0%.

The first two requests were granted through Order No. 05AQ-C022, First Revision (Proposed Decision) issued October 3, 2008. The third and fourth requests are addressed in this Proposed Order.

The project location is 301 9th Avenue, in Oroville, Washington, within Section 28, Township 40 North, Range 27 East, W.M., Okanogan County.

In relation to the above, the Department of Ecology, State of Washington, pursuant to Revised Code of Washington (RCW) RCW-70.94.152, makes the following determinations:

- 1.1 The proposed project, if constructed and operated as herein required, will be in accordance with applicable rules and regulations, as set forth in Chapter 173-400 WAC and 173-460 WAC, and the operation thereof, at the location proposed, will not result in ambient air quality standards being exceeded.
- 1.2 The proposed project, if constructed and operated as herein required, will ~~provide all known, available and reasonable methods of emission control~~ (employ best available control technology-) (BACT) to control emission of criteria pollutants, and best available control technology for toxics (T-BACT) to control emission of toxic air pollutants.
- 1.3 Upon final approval, this Order No. 05AQ-C022, First Revision, will supersede Order No. 05AQ-C022. The provisions of Order No. 05AQ-C022 will no longer be in effect.

THEREFORE, IT IS ORDERED that the project as described in said Notice of Construction application and more specifically detailed in plans, specifications and other information submitted to the Department of Ecology in reference thereto, is approved for construction, installation and operation, provided the following conditions are met:

2.0 APPROVAL CONDITIONS

2.1 LAWS AND REGULATIONS

A portion of this proposal by Oroville Reman & Reload qualifies as a new source of air contaminants under Washington Administrative Code (WAC) 173-400-110 and WAC 173-460-040. The proposed project shall comply with all ~~current~~ state laws and regulations, including ~~Revised Code of Washington (RCW) Chapter 70.94 RCW,~~ Washington Clean Air Act, ~~2000;~~ Chapter WAC 173-400 WAC, General Regulations for Air Pollution Sources, ~~July 11, 2002;~~ and Chapter WAC 173-460 WAC, New Sources of Toxic Air Pollutants, ~~July 21, 1998.~~

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2.2 ESTIMATED EMISSIONS

The project will produce up to the following estimated controlled emissions:

Pollutant	Emissions	
<u>Total Suspended Particulate Matter (TSP)</u>	<u>15.218.2</u>	<u>tons per year</u>
<u>Particulate matter less than 10 microns (PM₁₀)</u>	<u>7.3</u>	<u>tons per year</u>
<u>Particulate matter less than 2.5 microns (PM_{2.5})</u>	<u>3.7</u>	<u>tons per year</u>
<u>Volatile Organic Compounds (VOC)</u>	<u>26.4</u>	<u>tons per year</u>
<u>Glycol ethers</u>	<u>5.3</u>	<u>tons per year</u>

2.3 BACT

As required by WAC 173-400-113(2), this project shall use BACT (Best Available Control Technology) to control emissions of criteria pollutants. The project will use the following technologies and procedures to attain BACT for total suspended particulate (TSP), particulate matter less than 10 microns (PM₁₀), and particulate matter less than 2.5 microns (PM_{2.5}) and volatile organic compound (VOC) emissions.

2.3.1 Saws and Molder

2.3.1.1 Plant 1 BACT – for TSP, PM₁₀ and PM_{2.5} PM₁₀ emissions from Plant 1 shall be controlled by enclosure and control of pneumatic conveying system discharge by fabric filter control device (baghouse). No cyclone shall be used unless the discharge to the air from the top of the cyclone is controlled by a properly designed and operated baghouse.

2.3.1.2 Plant 2 – TSP, PM₁₀ and PM_{2.5} emissions from Plant 2 shall be controlled by enclosure and control of pneumatic conveying system discharge by routing emissions to a properly designed and operated cyclone. Visible emissions from the top of the cyclone shall not exceed 10 percent opacity.

2.3.2 Paint Spray Booth

BACT for PM₁₀ shall consist of applying surface coating to products only within a spray booth in which all exhaust air is being passed through filter media at least two inches thick. BACT for VOC shall consist of using surface coatings and solvents which meet the limits in this order and have the lowest feasible VOC content.

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2.3.3 Wood Waste Truck Loading

After January 1, 2006, all truck loading of wood waste shall be conducted within a complete enclosure. BACT for TSP, PM₁₀ and PM_{2.5} shall consist of enclosure and control by fabric filter control device. No wood waste shall be shipped from the site by rail.

2.3.4 Wood Waste Conveying and Storage

2.3.4.1 Plant 1 – BACT for TSP, PM₁₀ and PM_{2.5} PM₁₀ emissions from Plant 1 shall be controlled by enclosure of all wood waste storage areas and non-pneumatic conveyors, except that such enclosure is not required if there are no visible emissions. Each pneumatic conveyor system discharge from Plant 1 shall be controlled by fabric filter control device (baghouse). No cyclone shall be used unless the discharge to the air from the top of the cyclone is controlled by a properly designed and operated baghouse.

2.3.4.2 Plant 2 – TSP, PM₁₀ and PM_{2.5} emissions from Plant 2 shall be controlled by enclosure of all wood waste storage areas and non-pneumatic conveyors, except that such enclosure is not required if there are no visible emissions. Each pneumatic conveyor system discharge from Plant 2 shall be controlled by a properly designed and operated cyclone. Visible emissions from the top of the cyclone shall not exceed 10 percent opacity.

2.3.5 Vehicle Travel and Other Fugitive Dust

BACT for TSP, PM₁₀ and PM_{2.5} PM₁₀ shall consist of paving or dust suppression of areas on which travel by rubber-tired vehicles occurs, by speed limits, and by a Fugitive Dust Control Plan as described below under Condition 2.8.

2.4 T-BACT

As required by WAC 173-460-040(4)(b), this project shall use Best Available Control Technology for Toxics (T-BACT). T-BACT shall consist of the same measures described above under BACT.

2.5 PRODUCTION

2.5.1 No more than 4,80010,000 tons of wood waste (total of sawdust, shavings, grindings, sanderdust, chips) shall be produced per year from Plants 1 and 2, measured as a 12-month rolling total calculated on a quarterly basis.

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2.5.2 Plant 2's cyclone shall operate for no more than 2,000 hours in any consecutive 12-month period.

2.5.3 No more than 350 gallons of paint shall be used per week. Production of more than 4,800/10,000 tons of wood waste per year (Plants 1 and 2 combined), use of more than 350 gallons per week of paint, operation of Plant 2's cyclone for more than 2,000 hours in any 12-month period, or alteration of the facility that increases the capacity to emit air contaminants, will require approval by Ecology of separate Notice(s) of Construction applications.

2.6 EMISSION LIMITS

2.6.1 There shall be no visible emissions (~~zero percent opacity~~) to the outside air from any conveying or storage associated with units authorized by this approval.

2.6.2 Total particulate matter (TSP) emissions from any baghouse exhaust shall not exceed 0.01 grains per dry standard cubic foot of exhaust gas, and 2.55 pounds per hour.

2.6.3 Total particulate matter (TSP) emissions from Plant 2's cyclone discharge shall not exceed 7.00 pounds per hour.

2.7 OPERATING & MAINTENANCE

A site specific operating and maintenance (O&M) manual shall be developed and followed. Manufacturer's instructions may be referenced. O&M manual development shall be completed within 30 days of issuance of this order. The O&M manual shall be updated to reflect any modifications to the O&M procedures. The equipment shall be operated and maintained in accordance with the O&M manual. Equipment shall be properly operated and maintained. Failure to follow the requirements of the O&M manual and the adequacy of the O&M manual will be two of the factors considered by Ecology in determining whether the source is properly operated and maintained. Regular O&M records shall be kept at the source. These O&M records shall be available for inspection by Ecology, organized in a readily accessible manner, and retained for at least five (5) years. The O&M manual shall at a minimum include:

2.7.1 Normal operating parameters for the emissions unit(s);

2.7.2 A maintenance schedule for the emissions unit(s);

2.7.3 Monitoring and record keeping requirements, including a requirement to maintain a record of the number of hours of operation of Plant 2's cyclone;

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2.7.4 A description of the monitoring procedures;

2.7.5 ~~A requirement that no production shall occur unless the associated air pollution control systems are operating; and~~

2.7.6 Actions for abnormal control system operation-; and

~~2.7.6—Except as allowed under this condition, no spray paint equipment shall be used other than High Volume Low Pressure (HVLP) airspray equipment which operates with a fluid pressure no greater than ten pounds per square inch and which operates without cleaning solvents. Airless spray equipment may be used where viscosity and high solid coatings preclude the use of higher transfer efficiency spray equipment.~~

~~2.7.7—Only water borne surface coatings shall be used. All surface coatings used shall contain 250 grams or less VOC per liter less water and less than 2.9 pounds VOC per gallon of paint.~~

2.7.8 ~~A~~ Description of measures to prevent air emissions during baghouse cleaning and maintenance operations.

2.8 FUGITIVE EMISSIONS

2.8.1 ~~2.8.1~~—Fugitive dust (including both wood waste particles and dust from traditional open dust sources generated by the forces of wind or machinery acting on exposed materials) shall be properly controlled in accordance with a site-specific fugitive dust control plan (FDCP). The FDCP shall be kept updated. Failure to follow the requirements of the FDCP and the adequacy of the FDCP will be two of the factors considered by Ecology in determining whether the fugitive dust is being properly controlled. The FDCP shall at a minimum include:

2.8.1.1 A schedule with semi-annual deadlines for the completion of phases that improve control of emissions from wood waste truck loading, beginning with full enclosure of wood waste truck loading operations by December 31, 2005, and with the schedule to be deemed satisfied when no material with an identifiable fraction of wood is deposited on nearby residential property;

2.8.1.2 Control of emissions from vehicle travel areas shall include either paving or application of dust suppressants at sufficiently frequent intervals to prevent visible fugitive emissions exceeding 10-% opacity ~~for more than three minutes in any one hour;~~

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2.8.1.3 A vehicle speed limit of 10 miles per hour;

2.8.1.4 Requirements to practice good housekeeping, including a requirement to clean up any visible spill of wood waste as soon as it occurs;

2.8.1.5 A prohibition on storage of chips, saw dust, or wood waste in unenclosed piles, except that such enclosure is not required if there are no visible emissions.

2.8.2 ~~There shall be no particulate matter from this operation deposited beyond the property line. The permittee shall not cause or allow wood waste particles to be deposited beyond the property line in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited.~~

2.8.3 ~~2.8.3— There shall be no vehicle trackout onto offsite paved roads. The Fugitive Dust Control Plan shall include measures to ensure there is no vehicle track-out onto off-site roads.~~

2.8.4 No emissions generated on the site shall be visible ~~after crossing beyond~~ the property line.

2.9 TESTING

2.9.1 Regular periodic performance testing is not a condition of this approval. When complaint investigation, visibility observations, compliance questions, or other information obtained by Ecology indicates the need to measure emissions, Ecology may require the source to conduct performance testing. This provision is in addition to any testing required by Ecology pursuant to WAC 173-400-105.

2.9.2 In the event performance testing is required, the following methods shall be used, unless alternate methods have been approved by Ecology in writing prior to the testing:-

Pollutant	Test Method
Particulate Matter	Title 40 CFR Part 60, Appendix A, Method 5, July 1, 2000
Volatile Organic Compounds (VOC)	Title 40 CFR Part 60, Appendix A, Method 18, July 1, 2000
Opacity	Title 40 CFR Part 60, Appendix A, Method 9, July 1, 2000

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2.9.3 In the event that performance testing is required, a test plan, including a description of the methods proposed, shall be submitted to Ecology at least 30 days prior to any performance testing. A written report of performance testing shall be submitted to Ecology within 60 days after conducting performance testing.

2.9.4 In the event that performance testing is required, sampling ports and platforms must be provided by the permittee. The ports must meet the requirements of 40 CFR 60, Appendix A, Method 1, July 1, 2000. Adequate permanent and safe access to the test ports must be provided.

2.10 GENERAL CONDITIONS

2.10.1 No outdoor burning shall be conducted at the site. No type of combustion of wood waste shall take place at the site.

~~2.10.2 Odor from painting shall not be detectable beyond the facility property line. Such violations shall be subject to any or all of the remedies provided in RCW 70.94 for violations of an Ecology Order. In the event odor from painting is detected beyond the property line a second time, Ecology may order Oroville Reman & Reload to take specific measures to control odor. These measures may include, but are not limited to, the installation of additional pollution control devices such as thermal oxidation and carbon adsorption.~~

~~2.10.3~~ Records of all data shall be maintained in a readily retrievable manner for a period of five years and be made available at the plant site to authorized representatives of Ecology upon request.

~~2.10.34~~ Legible copies of this Order, the O&M Manual, and the FDCP shall be on-site in a location known by and available to employees in direct operation of the described equipment and available to Ecology upon request.

~~2.10.54~~ This Order shall become invalid if construction is not commenced within 18 months after receipt of final approval, if construction is discontinued for a period of 18 months or more, or if construction is not complete within a reasonable time. Ecology may extend the 18-month period upon a satisfactory showing that an extension is justified.

~~2.10.56~~ It shall be grounds for rescission of this approval if physical operation is discontinued for a period of eighteen (18) months or more. Ecology may

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extend the 18-month period upon a satisfactory showing that an extension is justified.

2.10.76 Access to the source by the United States Environmental Protection Agency or the Department of Ecology shall be permitted upon request for the purposes of compliance assurance inspections. Failure to allow access is grounds for revocation of this Order.

2.10.87 Operation of equipment must be conducted in compliance with all data and specifications submitted as part of the Notice of Construction application unless otherwise approved by Ecology. Any activity undertaken by the permittee, or others, in a manner which is inconsistent with the application or this Order, shall be subject to Ecology enforcement under applicable regulations.

2.10.98 Nothing in this Order shall be construed so as to relieve the permittee of its obligations under any state, local, or federal laws or regulations.

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

2.10.110 This Order is valid only after payment of appropriate fee(s) required pursuant to WAC 173-~~455-120400-116~~.

All plans, specifications and other information submitted to the Department of Ecology relative to this project and further documents and any further authorizations or approvals or denials in relation thereto shall be kept at the Central Regional Office of the Department of Ecology in the "Air Quality Controlled Sources" files and by such action shall be incorporated herein and made a part hereof.

Nothing in this approval shall be construed as obviating compliance with any requirement of law other than those imposed pursuant to the Washington Clean Air Act and rules and regulations thereunder. Any violation of such rules and regulations or of the terms of this approval shall be subject to the sanctions provided in Chapter 70.94 RCW.

Authorization may be modified, suspended or revoked in whole or part for cause, including, but not limited to, the following:

I. Violation of any terms or conditions of this authorization;

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- II. Obtaining this authorization by misrepresentation or failure to disclose fully all relevant facts.

The provisions of this authorization are severable and, if any provision of this authorization or application of any provision to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this authorization, shall not be affected thereby.

APPEAL INFORMATION:

You have a right to appeal this permit. To appeal this you must:

- File your appeal with the Pollution Control Hearings Board within 30 days of the “date of receipt” of this document. Filing means actual receipt by the Board during regular office hours.
- Serve your appeal on the Department of Ecology within 30 days of the “date of receipt” of this document. Service may be accomplished by any of the procedures identified in WAC 371-08-305(10). “Date of receipt” is defined at Revised Code of Washington (RCW) 43.21B.001(2).

Be sure to do the following:

- Include a copy of (1) the permit you are appealing and (2) the application for the permit.
- Serve and file your appeal in paper form; electronic copies are not accepted.

1. To file your appeal with the Pollution Control Hearings Board

Mail appeal to:

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

OR

Deliver your appeal in person to:

The Pollution Control Hearings Board
4224 – 6th Ave SE Rowe Six, Bldg 2
Lacey, WA 98503

2. To serve your appeal on the Department of Ecology

Mail appeal to:

The Department of Ecology
Appeals Coordinator
P.O. Box 47608
Olympia, WA 98504-7608

OR

Deliver your appeal in person to:

The Department of Ecology
Appeals Coordinator
300 Desmond Dr SE
Lacey, WA 98503

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3. And send a copy of your appeal to:

Susan Billings
Department of Ecology
Central Regional Office
15 West Yakima Avenue, Suite 200
Yakima, Washington 98902-3452

For additional information, visit the Environmental Hearings Office Website:
<http://www.eho.wa.gov>

To find laws and agency rules, visit the Washington State Legislature Website:
<http://www1.leg.wa.gov/CodeReviser>

DATED at Yakima, Washington this 30th day of December, 2008.

Prepared By:

Proposed Decision

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Proposed Decision

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