

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

IN THE MATTER OF THE COMPLIANCE BY)	AIR OPERATING PERMIT
BOISE BUILDING SOLUTIONS MANUFACTURING)	No. 03AQER-5613
KETTLE FALLS, WA; PLYWOOD FACILITY)	
1274 South Boise Road, Kettle Falls, Washington 99141)	FINAL PERMIT
with Section 70.94.161 RCW, Operating Permits for)	2nd Revision
Air Contaminant Sources, and the applicable rules and)	
regulations of the Department of Ecology)	

To: Boise Building Solutions Manufacturing, LLC
1274 South Boise Road, Kettle Falls
Kettle Falls, Washington 99141

Issuance Date:	<u>April 25, 2005</u>
Effective Date:	<u>April 25, 2005</u>
Expiration Date:	<u>July 1, 2008</u>

Legal Authority: This Air Operating Permit is issued under the authority and provisions of the Federal Clean Air Act (FCAA), (42 U.S.C. 7401, et seq.), the Washington Clean Air Act, Chapter 70.94 Revised Code of Washington (RCW) and the Operating Permit Regulation, Chapter 173-401 Washington Administrative Code (WAC).

Hereinafter, Boise Building Solutions Manufacturing, LLC , Kettle Falls Plywood Facility is called the permittee. The permittee is required to comply with the provisions contained within this permit.

The Renewal Air Operating Permit, DATED at Spokane, Washington, the 27th day of June, 2003. The 1st Revision, DATED at Spokane, Washington, the 28th day of December, 2004. This 2nd Revision, DATED at Spokane, Washington, this 25th day of April, 2005.

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LIST OF ABBREVIATIONS

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

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

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

U.S. EPA Region 10 Administrator
Air Permits MS: OAQ-108
1200 Sixth Avenue
Seattle, Washington 98101

1. STANDARD CONDITIONS

1.1 Permit Shield

1.1.1 Compliance with the terms and conditions of this permit shall be deemed compliance with those applicable requirements that are specifically included and identified in this permit as of the date of permit issuance.

1.1.2 The permit shield shall not apply to any insignificant emissions unit or activity designated under WAC 173-401-530.

[WAC 173-401-530(3), 09/16/02], [WAC 173-401-640(1), 09/16/02]

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

[WAC 173-401-625, 09/16/02]

1.3 Permit Fees The permittee shall pay fees as a condition of this permit in accordance with Ecology's fee schedule. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in chapter 70.94 RCW. Ecology may revoke this operating permit if the permit fees are not paid, per WAC 173-401-930(3).

[WAC 173-401-620(2)(f), 930(3), 09/16/02], [RCW 70.94.162(1), 1/4/01 (S)], [Order No. DE 99AQ-E103, Issued 01/19/99, Approval Condition 9.9]

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

[WAC 173-401-620(2)(j), 09/16/02]

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), 09/16/02]

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

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 shall be required to provide platform and sampling ports. Ecology shall be allowed to obtain a sample from any emissions unit. The permittee shall be given the opportunity to observe the sampling and to obtain a sample at the same time.
- 1.6.5** No person shall 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 shall limit the ability of EPA to inspect or enter the premises of the permittee under Section 114 or other provisions of the FCAA.
- 1.6.7** Any required source testing shall comply with Ecology minimum requirements.

[WAC 173-401-630(2), 09/16/02], [WAC 173-400-105(2),(4), 8/20/93, 07/11/02 (S)], [RCW 70.94.200, 1/4/01 (S)], [Order No. DE 93AQ-E114 First Amendment, Issued 03/15/95, Approval Conditions 7.1 and 8.5], [Order No. DE 94AQ-E111 1st Amendment, Issued 01/08/03, Approval Conditions 5, 6, 7.1, 7.2, 7.3, 8.5], [Order No. DE 99AQ-E103, Issued 01/19/99, Approval Conditions 2.1, 2.2, 3.3, 7.2, 9.3], [Order No. 01AQER-1920 1st Amendment, Issued 01/08/03, Approval Conditions 4.1, 4.1.1, 4.1.2, 4.1.3, 4.1.4, 5.3], [Order No. DE 92AQ-E152 Second Amendment, Issued 01/25/94, Approval Conditions 1, 5, 7.2, 7.3, 7.5, 8.4], [PSD-X80-01 First Amendment, Issued 02/14/03, Approval Condition 6b]

- 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 70.94 RCW and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.

[WAC 173-401-620(2)(a), 09/16/02], [Order No. DE 93AQ-E114 First Amendment, Issued 03/15/95, Approval Condition 8.9], [Order No. DE 94AQ-E111 1st Amendment, Issued 01/08/03, Approval Condition 8.9], [Order No. DE 99AQ-E103, Issued 01/19/99, Approval Conditions 9.7, 9.8], [Order No. 01AQER-1920 1st Amendment, Issued 01/08/03, Approval Condition 5.6], [Order No. DE 92AQ-E152 Second Amendment, Issued 01/25/94, Approval Condition 8.9], [PSD-X80-01 First Amendment, Issued 02/14/03, Approval Condition 5], [Order No. DE 91AQ-E123, Issued 11/08/91, Approval Condition 10]

- 1.8 Duty to Provide Information** The permittee shall furnish to Ecology, within a reasonable time, any information that Ecology may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to Ecology copies of records required to be kept by this permit or, for information claimed to be confidential, the permittee may furnish such records directly to Ecology along with a claim of confidentiality. Ecology shall maintain confidentiality of such information in accordance with RCW 70.94.205.

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

[WAC 173-401-620(2)(e), 09/16/02], [WAC 173-400-105(7), (8), 8/20/93, 07/11/02 (S)]

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

[WAC 173-401-500(6), 09/16/02]

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

[WAC 173-401-620(2)(b), 09/16/02]

1.11 Excess Emissions Due to an Emergency The permittee may seek to establish that noncompliance with a technology-based¹ emission limitation under this permit was due to an emergency.² To do so, the permittee shall 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 (2) 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.

[WAC 173-401-645, 09/16/02]

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

1.12.1 The permittee shall have the burden of proving to Ecology that excess emissions were unavoidable. This demonstration shall be a condition to obtaining relief under 1.12.2, 1.12.3, or 1.12.4.

1.12.2 Excess emissions due to startup or shutdown conditions shall be considered unavoidable provided the source reports as required under Condition 1.13.1 and adequately demonstrates that the excess emissions could not have been prevented through careful planning and design and if a bypass of control equipment occurs, that such bypass is necessary to prevent loss of life, personal injury, or severe property damage.

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

² An "emergency" means any situation arising from sudden and reasonably enforceable 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 shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- 1.12.3** Excess emissions due to scheduled maintenance shall be considered unavoidable if the source 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.
- 1.12.4** Excess emissions due to upsets shall be considered unavoidable provided the source reports as required under Condition 1.13.1 and adequately demonstrates that:
- 1.12.4.1** The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition.
 - 1.12.4.2** The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance.
 - 1.12.4.3** 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, including slowing or shutting down the emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded.

[WAC 173-400-107(3), 8/20/93, 07/11/02 (S)], [WAC 173-400-107, 8/20/93, 07/11/02 (S)]

1.13 Reporting

1.13.1 Monthly Deviation Reports The permittee shall report deviations from permit conditions, including those attributable to upset conditions as defined in this permit, and include the following information: the time the deviation occurred, 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. Such deviations shall be reported “promptly” to Ecology at the address included in this permit.

For deviations which represent a potential threat to human health or safety, or which the source believes to be unavoidable, “promptly” means as soon as possible, but in no case later than twelve (12) hours after the deviation is discovered. Other deviations shall be reported no later than thirty days after the end of the month during which the deviation is discovered. Upon request by Ecology, the permittee shall submit a full written report including further details regarding the known causes, the corrective actions taken, and the preventative measures to be taken to minimize or eliminate the chance of recurrence. For any month during which no permit deviations are discovered, the permittee shall submit a report no later than 30 days following the end of the month informing Ecology that no deviations were observed during that period. The source shall maintain a contemporaneous record of all deviations. Responsible official certification in accordance with Condition 1.13.5 of monthly deviation reports shall be included in each semi-annual monitoring report covering all deviation reports made during the previous six month period.

For deviations in which the abort gate on the hogged fuel boiler is used to bypass boiler exhaust gases so that they do not pass through the EFB, this notification shall be made not later than the next business day following the deviation. Notifications of this specific type may be made via telephone call with a written report following within five (5) business days of the deviation.

[WAC 173-401-615(3)(b), 09/16/02], [WAC 173-400-107, 8/20/93, 07/11/02 (S)], [WAC 173-401-630(1), 5/15/01], [Order No. DE 99AQ-E103, Issued 01/19/99, Approval Condition 7.1], [PSD-X80-01 First Amendment, Issued 02/14/03, Approval Condition 3], [Order No. DE 91AQ-E123, Issued 11/08/91, Approval Conditions 6, 8], [Order No. DE 94AQ-E111 1st Amendment, Issued 01/08/03, Approval Condition 3]

1.13.2 Semi-Annual Monitoring Reports The permittee shall submit semi-annual reports which include monitoring, recordkeeping, and/or reporting information that is required to be submitted every six (6) months. Six-month periods shall be twice each calendar year from January 1st through June 30th, and from July 1st through December 31st. Semi-annual monitoring reports shall be due no later than forty-five (45) days following the end of each six (6) month period. The first semi-annual monitoring report submitted under this Renewal AOP shall include all information required to be submitted under the original AOP as well as any additional information required under the Renewal AOP. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with Condition 1.13.6.

[WAC 173-401-615(3)(a), 09/16/02]

1.13.3 Compliance Certifications The permittee shall submit a certification of compliance with permit terms and conditions at least once per calendar year. All certifications shall be submitted no later than forty-five (45) days following the end of the certification period. Upon issuance of this final permit, a final compliance certification shall be submitted under the original AOP for the period of time between the latest certification submitted and the renewal permit effective date. The first certification submitted under this renewal AOP shall cover the period of time between the renewal permit effective date and the end of that calendar year. Ecology may require that compliance certifications be submitted more frequently for those emission units not in compliance with permit terms and conditions, or where more frequent certification is specified in the applicable requirement.

[WAC 173-401-630(5)(a), 09/16/02], [WAC 173-401-630(1), 09/16/02]

1.13.3.1 The certification shall 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.

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), 09/16/02]

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

[WAC 173-401-630(5)(d), 09/16/02]

1.13.3.3 The permittee need not certify compliance for insignificant emission units or activities.

[WAC 173-401-530(2)(d), 09/16/02]

1.13.3.4 All compliance certifications shall include certification by a responsible official in accordance with WAC 173-401-520.

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

[40 CFR 52.33(a), 07/01/02]

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

[WAC 173-400-105(1), 8/20/93, 07/11/02 (S)]

1.13.5 Submittals Reports, test data, monitoring data, notifications, certifications, and applications (including requests for renewal) shall be submitted to Ecology at the address included in this permit. Any document submitted to Ecology pursuant to this permit shall contain certification of truth, accuracy, and completeness by a responsible official. All certifications shall state that *“based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete”*. The permittee shall promptly, upon discovery, report to Ecology any material error or omission in these records, reports, plans or other documents.

[WAC 173-401-520, 09/16/02], [WAC 173-401-500(6), 09/16/02]

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 shall remain in effect and be enforceable.

[WAC 173-401-620(2)(h), 09/16/02], [RCW 70.94.905, 1/4/01 (S)]

1.15 Administrative Permit Amendments

1.15.1 An administrative permit amendment is a permit revision that:

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

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

[WAC 173-401-720, 09/16/02]

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), 09/16/02]

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 (3) or more years prior to the expiration date of this permit. Such a reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j).

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 shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

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

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

[WAC 173-401-730, 09/16/02]

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 shall not weaken the enforceability of any existing permit conditions.

1.18.2 Each such change shall meet all applicable requirements and shall 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 shall describe each such change, including the date, any change in emissions or pollutants emitted, and any applicable requirements that would apply as a result of the change.

1.18.4 The change shall not qualify for the permit shield under Condition 1.1.

1.18.5 The permittee shall record all changes that result in emissions of any regulated air pollutant subject to any applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes. The record shall reside at the permitted facility.

1.18.6 A source making a change under this section shall comply with the preconstruction review requirements established pursuant to Condition 1.20.

[WAC 173-401-724, 09/16/02]

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 shall 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 shall be provided as soon as possible after the event;

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

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 shall be subject to the following:

1.19.2.1 The written notification required under Condition 1.19.1.4 shall include such information as may be required by the provision in the Washington SIP authorizing the emissions trade, including at a minimum, when the proposed change will occur, a description of each such change, any change in emissions, the permit requirements with which the source will comply using the emissions trading provisions of the Washington SIP, and the pollutants emitted subject to the emissions trade. The notice shall also refer to the provisions with which the source will comply in the applicable implementation plan and that provide for the emissions trade. The notification shall state how any increases or decreases in emissions will comply with the terms and conditions of the permit. (The permit shield described under Condition 1.1 shall extend to terms and conditions that allow such increases and decreases.)

1.19.2.2 The permit shield described in Condition 1.1 shall not extend to any change made under this paragraph. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the applicable implementation plan authorizing the emissions trade.

1.19.2.3 Upon the request of the permit applicant, Ecology shall issue permits that contain terms and conditions, including all terms required under WAC 173-401-600 through 173-401-630 to determine compliance, allowing for the trading of emissions increases

and decreases in the chapter 173-401 WAC source solely for the purpose of complying with a federally enforceable emissions cap that is established in the permit independent of otherwise applicable requirements. The permit applicant shall include in its application proposed replicable procedures and permit terms that ensure the emissions trades are quantifiable and enforceable. The emissions trading provision shall not be applied to any emissions units for which emission are not quantifiable or for which there are no replicable procedures to enforce the emissions trades. The permit shall also require compliance with all applicable requirements.

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

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

[WAC 173-401-722, 09/16/02], [WAC 173-401-620(2)(g), 09/16/02]

1.20 New Source Review The permittee shall not construct new sources or make modifications required to be reviewed under WAC 173-400-110, WAC 173-400-113, WAC 173-400-141, or WAC 173-460 before the permittee obtains written final approval from Ecology in accordance with those regulations, pays the appropriate fees required by WAC 173-400-116, and pays the cost of public notice described in WAC 173-400-171.

[WAC 173-400-110, 8/20/93, 07/11/02 (S)], [WAC 173-400-113, 8/20/93, 07/11/02 (S)], [WAC 173-400-116, 07/11/02 (S)], [WAC 173-400-141, 07/11/02 (S)], [WAC 173-400-171, 8/20/93, 07/11/02 (S)], [WAC 173-460, 7/21/98 (S)], [RCW 70.94.152, 1/4/01 (S)], [Order No. DE 93AQ-E114 First Amendment, Issued 03/15/95, Approval Condition 1], [Order No. DE 94AQ-E111 1st Amendment, Issued 01/08/03, Approval Condition 1], [Order No. DE 99AQ-E103, Issued 01/19/99, Approval Condition 1], [Order 01AQER-1920 1st Amendment, Issued 01/08/03, Approval Condition 1], [Order No. DE 92AQ-E152 Second Amendment, Issued 01/25/94, Approval Condition 1]

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 shall file for and obtain approval from Ecology according to that regulation. The permittee shall pay the appropriate fees required by WAC 173-400-045(4) prior to commencing construction.

[WAC 173-400-045(4), 07/11/02 (S)], [WAC 173-400-114, 07/11/02 (S)], [RCW 70.94.153, 1/4/01 (S)]

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, 09/16/02]

1.23 Permit Appeals This permit or any conditions in it may be appealed only by filing an appeal with the Pollution Control Hearings Board, P.O. Box 40903, Olympia, WA 98504-0903 and concurrently serving it on the Department of Ecology, P.O. Box 47600, Olympia, WA 98504-7600 and the Department of Ecology, Regional Air Quality Section, 4601 North Monroe, Spokane, WA 99205-1295 within thirty

days of receipt of this permit, pursuant to RCW 43.21B.310. This provision for appeal in this section is separate from and additional to any federal rights to petition and review under § 505(b) of the FCAA.

[WAC 173-401-620(2)(i), 09/16/02]

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

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

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

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

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

1.24.1.4 Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. (“MVAC-like appliance” is defined at 40 CFR 82.152.)

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

1.24.1.6 Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep servicing records documenting the date and type of service, as well as the quantity of refrigerant added. The owner/operator must keep records of refrigerant purchased and added to such appliances in cases where owners add their own refrigerant. Such records should indicate the date(s) when refrigerant is added pursuant to 40 CFR 82.166.

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

1.24.1.8 Person performing maintenance, service, repair, or disposal of appliances must certify to the Administrator that such person has acquired certified recovery of recycling equipment pursuant to 40 CFR 82.162.

1.24.2 If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR 82, Subpart A – Production and Consumption Controls.

1.24.3 If the permittee performs a service on motor (fleet) vehicles and when this service involves ozone depleting substance refrigerant in the MVAC, the permittee is subject to all applicable requirements as specified in 40 CFR 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.

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

[40 CFR 82, 07/01/02], [RCW 70.94.970, 1/4/01 (S)], [RCW 70.94.980, 1/4/01 (S)]

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 shall

be considered RACT for the purpose of permit issuance or renewal. RACT determinations under section 8, chapter 252, Laws of 1993 shall be incorporated into an operating permit as provided in WAC 173-401-730.

[WAC 173-401-605(3), 09/16/02], [RCW 70.94.154, 1/4/01 (S)]

1.26 Compliance Schedules

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

[WAC 173-401-510(2)(h)(iii)(A), 09/16/02], [WAC 173-401-510(2)(h)(iii)(B), 09/16/02]

1.27 Record Keeping

1.27.1 The permittee shall 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 analysis.

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), 09/16/02]

1.27.2 The permittee shall 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), 09/16/02]

1.27.3 The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) 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), 09/16/02]

1.27.4 All required recordkeeping shall be available to Ecology in accordance with Condition 1.6. All recordkeeping shall be retained for a period of five (5) years and kept in an organized, legible manner readily available for inspection by Ecology personnel.

[WAC 173-401-630(1), 630(2)(b), 615(1)(b), 09/16/02]

1.28 General Obligation Nothing in this permit shall 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), 09/16/02]

1.29 Permit Renewal and Expiration This permit is issued for a fixed term of 5 years. The permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application (as outlined in WAC 173-401-510) is submitted at least 12 months, but no greater than 18 months prior to the date of permit expiration. A complete renewal application is due no later than July 1, 2007. 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 shall cease to apply if, subsequent to a completeness determination, the applicant fails to submit by the deadline specified in writing by Ecology, any additional information identified as being needed to process the application. The application shall be sent to Ecology at the address included in this permit.

[WAC 173-401-610; 173-401-710, 09/16/02]

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 shall comply with the requirements of that rule. Such activities include notification, demolition, renovation, asbestos stripping or removal, installing or reinstalling insulation, manufacturing of fabricating certain items, spraying of certain materials, constructing roadways of certain materials, or disposal.

[40 CFR 61, Subpart M, 07/01/02], [WAC 173-400-075(1), 07/11/02 (S)]

2. APPLICABLE REQUIREMENTS

Until this permit expires, is modified or revoked, this permittee is authorized to operate the processes outlined in Sections 2.1 through 2.8. These processes are subject to the conditions included in Sections 2.1, through 2.8, to the MRRR’s listed in Section 3. Monitoring, Recordkeeping, and Reporting Requirements, and to other terms and conditions specified in this permit.

The column entitled **Description** in each table contains only a summary/paraphrase of the condition, emission standard or work practice. The condition, emission standard, or work practice itself is the enforceable requirement and should be referenced for actual language. Condition numbers that are denoted with an asterisk indicate that streamlining of a less stringent requirement has taken place and is described in section 12.0 of the Statement of Basis.

Testing Requirements

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

[WAC 173-401-615(1)(a), 09/16/02], [WAC 173-401-630(1), 09/16/02], [WAC 173-400-105(4), 07/11/02]

2.1 Section #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 2.8. Monitoring, recordkeeping and reporting requirements in this section do not apply to insignificant emission units.

TABLE 2.1

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.1.1	WAC 173-400-040(1), (1)(a), and (1)(b) 8/20/93	F	Visible emissions shall not exceed 20% opacity for more than 3 minutes in any one hour	RM 9A	4M
	WAC 173-400-040(1), (1)(a), and (1)(b) 07/11/02	S			
2.1.2	WAC 173-400-060 8/20/93	F	General process units are required to meet all applicable provisions of WAC 173-400-040 and emissions of particulate material from any operation shall not exceed 0.1 grain/dscf of exhaust gas	RM 5	4M
	WAC 173-400-060 07/11/02	S			

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.1.3	WAC 173-400-040(2) 07/11/02	S	Particulate matter shall not be deposited beyond the property in sufficient quantity to interfere unreasonably with the use and enjoyment of other's property		3M
2.1.4	WAC 173-400-040(3)(a), (8)(a) 8/20/93	F	The source shall perform maintenance to minimize emissions and take reasonable precautions to prevent fugitive dust from becoming airborne		3M
	WAC 173-400-040(3)(a), (8)(a) 07/11/02	S			
2.1.5	WAC 173-400-040(3)(a), (8)(a) 07/11/02	S	Fugitive dust control measures shall be taken to prevent fugitive emissions		5M
2.1.6	WAC 173-400-040(4) 07/11/02	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		3M
2.1.7	WAC 173-400-040(5) 8/20/93	F	No person shall cause or permit the emission of any air contaminant if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business		3M
	WAC 173-400-040(5) 07/11/02	S			
2.1.8	WAC 173-400-040(7) 8/20/93	F	No person shall conceal or mask an emission of an air contaminant		1M
	WAC 173-400-040(7) 07/11/02	S			
2.1.9	WAC 173-400-200(2) 8/20/93	F	No source may use dispersion techniques or excess stack height to meet ambient air quality standards or PSD increment limitations		1M
	WAC 173-400-200(2) 07/11/02	S			

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.1.10	WAC 173-400-205 8/20/93	F	Varying the rate of emission of a pollutant according to atmospheric conditions is prohibited, except as directed according to air pollution episode regulations		1M
	WAC 173-400-205 07/11/02	S			
2.1.11	RCW 70.94.040 1/4/01	S	Causing air pollution in violation of Chapter 70.94 RCW is unlawful		1M
2.1.12	Order No. DE 92AQ-E152 Second Amendment Issued 01/25/94 Approval Condition 8.2	F	Open burning is not allowed on site		2M
	Order No. DE 93AQ-E114 First Amendment Issued 03/15/95 Approval Condition 8.3				
	Order No. DE 94AQ-E111 1st Amendment Issued 01/08/03 Approval Condition 8.3				
	Order No. DE 99AQ-E103 Issued 01/19/99 Approval Condition 9.6				
	Chapter 173-425 WAC – Restriction on Open Burning				
2.1.13	WAC 173-400-040, 1 st ¶ 8/20/93	F	All emissions units are required to use RACT		1M
	WAC 173-400-040, 1 st ¶ 07/11/02 (RCW 70.94.154(1))	S			

2.2 Section #2, Cyclone C-2

TABLE 2.2

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.2.1	Order DE 93AQ-E114 First Amendment Issued 03/15/95 Approval Condition 2.1	F	Opacity from the cyclone exhaust shall be less than 10 percent over a six minute interval	RM 9	4M
2.2.2	Order DE 93AQ-E114 First Amendment Issued 03/15/95 Approval Condition 8.1	F	No visible emissions shall be allowed beyond the property line		6M
2.2.3	Order DE 93AQ-E114 First Amendment Issued 03/15/95 Section 3. RACT and Section 4. T-RACT	F	PM from 8 uncontrolled exhaust points on the lay-up line shall be combined in one manifold and controlled by a high-efficiency H&R Mechanical Systems cyclone as described in the Order		5M
2.2.4	Order DE 93AQ-E114 First Amendment Issued 03/15/95 Approval Conditions 4 and 8.2	F	The cyclone catch shall be controlled to prevent it from becoming airborne – it shall be routed through an airlock and then conveyed to the silo servicing the hogged fuel boiler		5M
2.2.5	Order DE 93AQ-E114 First Amendment Issued 03/15/95 Approval Condition 8.4	F	Order No. DE 93AQ-E114 becomes void if operation is discontinued for eighteen (18) months		7M
2.2.6	Order DE 93AQ-E114 First Amendment Issued 03/15/95 Approval Condition 8.7	F	Legible copies of Order No. DE 93AQ-E114 shall be on site		2M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.2.7	Order DE 93AQ-E114 First Amendment Issued 03/15/95 Approval Condition 8.8	F	All equipment must be operated in accordance with the information contained within the NOC application and manufacturer's instructions unless otherwise approved in writing by Ecology		5M

2.3 Section #3, Baghouse #1

TABLE 2.3

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.3.1	Order DE 94AQ-E111 1st Amendment Issued 01/08/03 Approval Condition 2.2	F	Opacity from the baghouse exhaust shall be less than 10 percent over a six minute interval	RM 9	4M
2.3.2	Order DE 94AQ-E111 1st Amendment Issued 01/08/03 Approval Condition 8.1	F	No visible emissions shall be allowed beyond the property line	RM 9 RM 22	6M
2.3.3	Order DE 94AQ-E111 1st Amendment Issued 01/08/03 Approval Condition 2.1	F	PM emissions from the baghouse exhaust shall not exceed 0.01 gr/dscf	RM 5	4M
2.3.4	Order DE 94AQ-E111 First Amendment Issued 01/08/03 Approval Condition 1	F	Total annual plywood production shall not exceed 280,000,000 square feet of 3/8" plywood		9M
2.3.5	Order DE 94AQ-E111 1st Amendment Issued 01/08/03 Section 3. RACT and Section 4. T-BACT	F	H&R Mechanical Systems baghouse shall be installed – A/C ratio of 5.3 and efficiency of 99.9 percent		5M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.3.6	Order DE 94AQ-E111 1st Amendment Issued 01/08/03 Approval Condition 8.2	F	The baghouse catch shall be processed back into the cyclone inlet in a closed system – the catch is then auger fed into the hogged fuel boiler fuel silo		5M
2.3.7	Order DE 94AQ-E111 1st Amendment Issued 01/08/03 Approval Condition 3	F	An electrical interlock or administrative requirement shall prevent dry waste processing unless the baghouse is online		5M
2.3.8	Order DE 94AQ-E111 1st Amendment Issued 01/08/03 Approval Conditions 6, 6.1, 6.2, 6.3, 6.4, 6.5, 6.6	F	O&M manual shall be followed and kept updated to reflect any modifications		10M
2.3.9	Order DE 94AQ-E111 1st Amendment Issued 01/08/03 Approval Condition 8.4	F	Order No. DE 94AQ-E111 1st Amendment becomes void if operation is discontinued for eighteen (18) months		7M
2.3.10	Order DE 94AQ-E111 1st Amendment Issued 01/08/03 Approval Condition 8.7	F	Legible copies of Order DE 94AQ-E111 1st Amendment and the O&M manual shall be in the working vicinity and available to the employees in direct operation of baghouse #1		2M
2.3.11	Order DE 94AQ-E111 1st Amendment Issued 01/08/03 Approval Condition 8.8	F	All equipment must be operated in accordance with the information contained within the NOC application, O&M manual and manufacturer's instructions unless otherwise approved in writing by Ecology		5M

2.4 Section #4, Baghouse #2

TABLE 2.4

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.4.1	Order DE 99AQ-E103 Issued 01/19/99 Approval Condition 2.1	F	Opacity from the baghouse exhaust shall not exceed 10 percent	RM 9	4M
2.4.2	Order DE 99AQ-E103 Issued 01/19/99 Approval Condition 8.2	F	There shall be no visible emissions from the baghouse catch system	RM 9	4M
2.4.3	Order DE 99AQ-E103 Issued 01/19/99 Approval Condition 9.1	F	No visible emissions shall be allowed beyond the property line	RM 9 RM 22	6M
2.4.4	Order DE 99AQ-E103 Issued 01/19/99 Approval Condition 2.2	F	PM-10 emissions from the baghouse exhaust shall not exceed 0.01 gr/dscf	RM 5 RM 202	4M, 7M
2.4.5	Order DE 99AQ-E103 Issued 01/19/99 Section 3. BACT and Approval Conditions 3.2, 3.3, 6.1, 6.2, 6.3	F	H&R Mechanical Systems baghouse shall be installed – A/C ratio of 5.3 and model # 216-SR-15		5M, 9M
2.4.6	Order DE 99AQ-E103 Issued 01/19/99 Approval Condition 8.2	F	The baghouse catch shall be routed through a rotary airlock to an enclosed catch system		5M
2.4.7	Order DE 99AQ-E103 Issued 01/19/99 Approval Condition 8.1	F	An electrical interlock, some other fail-safe device or administrative requirement shall prevent operation of the cyclone upstream of baghouse #2 unless the baghouse is online		5M
2.4.8	Order DE 99AQ-E103 Issued 01/19/99 Approval Conditions 3.1, 4, 4.1, 4.2, 4.3, 4.4, 4.5	F	O&M manual shall be followed and kept updated to reflect any modifications		10M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.4.9	Order DE 99AQ-E103 Issued 01/19/99 Approval Condition 9.2	F	Order No. DE 99AQ-E103 becomes void if operation is discontinued for eighteen (18) months		7M
2.4.10	Order DE 99AQ-E103 Issued 01/19/99 Approval Condition 9.4	F	Legible copies of Order DE 99AQ-E103 and the O&M manual shall be available to the employees in direct operation of baghouse #2		2M
2.4.11	Order DE 99AQ-E103 Issued 01/19/99 Approval Condition 9.5	F	All equipment must be operated in accordance with the information contained within the NOC application, O&M manual and manufacturer's instructions unless otherwise approved in writing by Ecology		5M

2.5 Section #5, Veneer Dryer #3

TABLE 2.5

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.5.1	Order 01AQER-1920 1st Amendment Issued 01/08/03 Approval Condition 5.1	F	No visible emissions shall be allowed beyond the property line	RM 9 RM 22	6M
2.5.2	Order 01AQER-1920 1st Amendment Issued 01/08/03 Approval Condition 1	F	Total dryer production shall not exceed 280 million square feet (3/8" equivalent) plywood		9M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.5.3	Order 01AQER-1920 1st Amendment Issued 01/08/03 Section 3. BACT and T-BACT	F	BACT/T-BACT shall be the following: <u>Organic Compounds</u> – Use of good combustion control, routing the dryer return air through the venturi scrubber, routing approx. 7% of the dryer return air to the fluidized bed combustors. <u>PM and other pollutants</u> – The dryer shall be operated and maintained such that there are no leaks or losses from the dryer during normal operation		4M, 5M
2.5.4	Order 01AQER-1920 1st Amendment Issued 01/08/03 Approval Conditions 3, 3.1, 3.2, 3.3, 3.4	F	O&M manual shall be followed and kept updated to reflect any modifications		11M, 12M
2.5.5	Order 01AQER-1920 1st Amendment Issued 01/08/03 Approval Condition 5.2	F	Order No. 01AQER-1920 1st Amendment becomes void if operation is discontinued for eighteen (18) months		8M
2.5.6	Order 01AQER-1920 1st Amendment Issued 01/08/03 Approval Condition 5.4	F	Legible copies of Order 01AQER-1920 1st Amendment and the O&M manual shall be in the working vicinity and available to the employees in direct operation of dryer #3		2M
2.5.7	Order 01AQER-1920 1st Amendment Issued 01/08/03 Approval Condition 5.5	F	All equipment must be operated in accordance with the information contained within the NOC application, O&M manual and manufacturer's instructions unless otherwise approved in writing by Ecology		5M

2.6 Section #6, Veneer Dryer #4

TABLE 2.6

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.6.1	Order No. DE 92AQ-E152 Second Amendment Issued 01/25/94 Approval Condition 8.1	F	No visible emissions shall be allowed beyond the property line	RM 9 RM 22	6M
2.6.2	Order No. DE 92AQ-E152 Second Amendment Issued 01/25/94 Section 3. BACT, Section 4. T-BACT and Approval Conditions 1, 5, 7.4	F	BACT shall be the following: <u>Organic Compounds</u> – Use of good combustion control, routing the dryer return air through the venturi scrubber, routing approx. 7% of the dryer return air to the fluidized bed combustors. <u>PM and other pollutants</u> – The dryer shall be operated and maintained such that there are no leaks or losses from the dryer during normal operation		4M, 5M, 11M
2.6.3	Order No. DE 92AQ-E152 Second Amendment Issued 01/25/94 Approval Conditions 6, 6.1, 6.2, 6.3, 6.4, 6.5	F	O&M manual shall be followed and kept updated to reflect any modifications		12M
2.6.4	Order No. DE 92AQ-E152 Second Amendment Issued 01/25/94 Approval Condition 8.3	F	Order No. DE 92AQ-E152 becomes void if operation is discontinued for eighteen (18) months		8M
2.6.5	Order No. DE 92AQ-E152 Second Amendment Issued 01/25/94 Approval Condition 8.7	F	Legible copies of Order DE 92AQ-E152 and the O&M manual shall be in the working vicinity and available to the employees in direct operation of dryer #4		2M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.6.6	Order No. DE 92AQ-E152 Second Amendment Issued 01/25/94 Approval Condition 8.8	F	All equipment must be operated in accordance with the information contained within the NOC application, O&M manual and manufacturer's instructions unless otherwise approved in writing by Ecology		5M

2.7 Section #7, Fluid Bed Combustors and Venturi Scrubber

TABLE 2.7

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.7.1	Order PSD-X80-01 First Amendment Issued 02/14/03 Approval Condition 1 Order No. DE 92AQ-E152 Second Amendment Issued 01/25/94 Approval Condition 2.3 Order No. 01AQER-1920 1st Amendment Issued 01/08/03 Approval Condition 2.7	F	Opacity from the scrubber stack shall not exceed 10%	RM 9	4M, 13M
2.7.2	Order PSD-X80-01 First Amendment Issued 02/14/03 Approval Conditions 1, 6a, 6b	F	Emissions of particulate matter from the scrubber stack shall not exceed 0.04 gr/dscf	RM 5	8M, 13M, 14M, 15M
2.7.3	Order PSD-X80-01 First Amendment Issued 02/14/03 Approval Condition 1	F	Annual emissions of particulate matter from the scrubber stack shall not exceed 186 tons	RM 5	8M, 13M, 14M, 15M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.7.4*	Order No. 01AQER-1920 1st Amendment Issued 01/08/03 Approval Condition 2.2	F	Emissions of condensable organic compounds from the scrubber stack shall not exceed 111,160 lbs/year (55.6 tons/year) or 13.23 lbs/hour	RM 202	8M, 13M, 14M, 15M
2.7.5*	Order No. 01AQER-1920 1st Amendment Issued 01/08/03 Approval Condition 2.1	F	Emissions of VOC's from the scrubber stack shall not exceed 237,720 lbs/year (118.86 tons/year) or 28.3 lbs/hour	RM 25A	8M, 13M, 14M, 15M
2.7.6	Order No. 01AQER-1920 1st Amendment Issued 01/08/03 Approval Condition 2.3	F	Emissions of nitrogen oxides from the scrubber stack shall not exceed 226,000 lbs/year (113 tons/year)	RM 7E	8M, 13M
2.7.7	Order No. 01AQER-1920 1st Amendment Issued 01/08/03 Approval Condition 2.4	F	Emissions of carbon monoxide from the scrubber stack shall not exceed 187,580 lbs/year (93.8 tons/year)	RM 10	8M, 13M
2.7.8	Order No. 01AQER-1920 1st Amendment Issued 01/08/03 Approval Condition 2.5	F	Emissions of sulfur dioxide from the scrubber stack shall not exceed 8,480 lbs/year (4.24 tons/year)	RM 6	7M
2.7.9	Order No. 01AQER-1920 1st Amendment Issued 01/08/03 Approval Conditions 2.6	F	Operation of the venturi scrubber and controlled processes shall be limited to 8,400 hours/year		11M
2.7.10	40 CFR 64.7(b)	F	The permittee shall maintain the monitoring equipment specified in 15M and 16M, including but not limited to, maintaining necessary parts for routine repairs of the equipment		2M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.7.11	Order PSD-X80-01 First Amendment Issued 02/14/03 Approval Condition 5	F	All equipment must be operated in accordance with the information contained within the PSD application		5M

2.8 Section #8, Hogged Fuel Boiler and Electrified Filter Bed

TABLE 2.8

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.8.1	Order PSD-X80-01 First Amendment Issued 02/14/03 Approval Condition 1 Order No. DE 91AQ-E123 Issued 11/08/91 Approval Condition 1(b)	F	Opacity from the EFB stack shall not exceed 10% as measured by RM 9 – Opacity shall not exceed 10% on an hourly average as measured by COMS	RM 9	4M, 17M, 18M
2.8.2	WAC 173-400-040(1), (1)(a), and (1)(b) 8/20/93 WAC 173-400-040(1), (1)(a), and (1)(b) 07/11/02	F S	Visible emissions shall not exceed 20% opacity for more than 3 minutes in any one hour	RM 9A	4M, 17M, 18M
2.8.3	Order No. DE 91AQ-E123 Issued 11/08/91 Approval Condition 1(a)	F	Emissions of PM-10 shall not exceed 0.030 gr/dscf @ 7% O ₂ and 19 tons/year	RM 5	8M, 17M, 22M
2.8.4	Order PSD-X80-01 First Amendment Issued 02/14/03 Approval Condition 1	F	Emissions of particulate matter shall not exceed 0.04 gr/dscf	RM 5	8M, 16M, 17M, 22M
2.8.5	Order PSD-X80-01 First Amendment Issued 02/14/03 Approval Condition 1	F	Annual emissions of particulate matter shall not exceed 196 tons	RM 5	8M, 17M, 22M

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal = F) (State = S)	Description	Testing	MRRR Reference
2.8.6	WAC 173-400-040 (6, 1 st ¶) 8/20/93	F	SO ₂ ≤ 1000 ppm @ 7% O ₂ (Sixty minute average)	RM 6	7M
	WAC 173-400-040 (6, 1 st ¶) 07/11/02	S			
2.8.7	WAC 173-400-070(2)(b) 8/20/93	F	All hogged fuel boilers shall utilize RACT and shall be operated and maintained to minimize emissions		5M, 19M
	WAC 173-400-070(2)(b) 07/11/02	S			
2.8.8	Order No. DE 78-459 Issued 10/24/78 Approval Condition 3	F	Hogged fuel boiler shall be derated below the manufacturer's nameplate rating		20M
	Order No. DE 91AQ-E123 Issued 11/08/91 Approval Condition 5				
2.8.9	Order No. DE 91AQ-E123 Issued 11/08/91 Approval Condition 6	F	The hogged fuel boiler abort gate shall be used only in specific emergency situations		21M
2.8.10	Order No. DE 91AQ-E123 Issued 11/08/91 Approval Condition 7	F	The continuous oxygen monitoring system shall be operated in accordance with the Q/A Plan		16M
2.8.11	Order No. DE 91AQ-E123 Issued 11/08/91 Approval Condition 4	F	O&M manual shall be followed and kept updated to reflect any modifications		19M
2.8.12	40 CFR 64.7(b)	F	The permittee shall maintain the monitoring equipment specified in 15M, 19M and 23M, including but not limited to, maintaining necessary parts for routine repairs of the equipment		2M
2.8.13	Order PSD-X80-01 First Amendment Issued 02/14/03 Approval Condition 5	F	All equipment must be operated in accordance with the information contained within the PSD application		5M

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

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

FACILITY WIDE

1M. The permittee shall conscientiously monitor site operations and promptly report any deviations.
[WAC 173-401-615(1)(b), 09/16/02]

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

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

[WAC 173-401-615(1)(b), 09/16/02]

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

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

[WAC 173-401-615(1)(b), 09/16/02]

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

- 1) At least once per month the permittee shall perform surveys for the purpose of observing all emission units that are sources of potential visible and/or PM emissions to which standards apply facility-wide as well as those emission units and activities for which this MRRR is specified in the "MRRR Reference" column in the above tables. The survey shall also be conducted as necessary when excess visible emission events are observed by facility personnel and reported to personnel responsible for environmental compliance. Facility personnel in general shall be made aware of their responsibility to report excess emission events. Insignificant emissions units are not subject to this MRRR requirement.

Each survey shall be performed as follows:

- a) The survey shall be conducted from a location with a clear view of the emission point and where the sun is as close as possible to being directly behind the observer. The observer's location shall be at least 15 feet but not more than ¼ mile from the source.
- b) The survey shall be conducted while the relevant emission unit as well as the associated facility process is in normal operation.
- c) The observer will be educated in the general procedures for determining the presence of visible emissions (i.e. effects on the visibility of emissions caused by background contrast, position of

the sun and amount of ambient lighting, observer position relative to source and sun, and the presence of uncombined water).

- d) The survey shall consist of a minimum of four (4) consecutive visual observations of each stack or emission point to identify whether the emission point under observation exhibits visible emissions. The observer shall look away from the emission point under observation between each observation in order to rest their eyes.
 - e) The permittee shall develop a standard form to be used for the visible emissions surveys described above. A copy of the developed form shall be provided to Ecology.
- 2) Upon completion of the visual survey, the permittee's corrective actions shall be governed by the following:
- a) If visible emissions are observed to be zero, no corrective action is required.
 - b) If visible emissions are observed, the following actions shall be taken, as described below:
 - i) As soon as possible, but no later than 24 hours after visible emissions are observed, the permittee shall verify that all equipment which may affect emissions is performing its normal, designed function and being operated according to standard procedures. If any equipment is not performing as described, corrective action shall be initiated within 24 hours after the original observation of visible emissions. The corrective action taken shall return the equipment to normal operation as soon as possible and be designed to prevent the likely recurrence of the cause of the deviation.
 - a. If the corrective action taken results in a return to conditions under which visible emissions are not observable via the method outlined in 1) above within the 24 hour window after visible emissions were originally observed, no further corrective action is required.
 - b. If, after corrective action is taken, visible emissions are still observed, or if the necessary corrective action requires a period of time beyond the 24 hour window, the permittee shall perform ii):
 - ii) The permittee shall perform, or have performed, RM 9 on the source of the emissions. The RM 9 test shall be conducted only by personnel certified to perform RM 9 in accordance with EPA guidelines. The test shall occur as soon as possible, but no later than forty-eight (48) hours after the original observation of visible emissions.
 - a. If the visible emissions as determined by RM 9 do not exceed the applicable standard, no further corrective action is required.
 - b. If a violation of any applicable opacity standard is documented, the permittee shall perform iii):
 - iii) If a violation of any applicable opacity standard is documented, appropriate and timely action shall be initiated (as soon as possible, but no later than 24 hours after discovery of the violation via RM 9 test) to identify and correct the problem causing the opacity. The corrective action taken shall return the equipment to normal operation as soon as possible and be designed to prevent the likely recurrence of the cause of the violation. Once corrective action has been taken to solve the problem, the permittee shall perform, or have performed, RM 9 on the source of emissions in order to demonstrate re-establishment of normal operation. Taking corrective action does not relieve the permittee from complying with the underlying condition, emission standard or work practice, nor does it relieve the permittee from the obligation to report any permit deviations as required in Standard Condition 1.13.1

- 3) The permittee shall conduct recordkeeping in accordance with the following.
 - a) The permittee shall maintain records of all RM 9 tests performed for a period of five (5) years. This recordkeeping requirement shall be satisfied by keeping the original RM 9 test form.
 - b) The permittee shall maintain a list of site personnel who have been educated as described in 1), c) above, as well as a list of site personnel who are currently certified to perform RM 9.
 - c) Recordkeeping with regard to each deviation shall include the following:
 - i) Time, date, and duration of the deviation,
 - ii) Cause of the deviation,
 - iii) Estimate of excess emissions and magnitude of deviation, and
 - iv) Corrective action taken, and the results of such action.
- 4) The permittee shall conduct reporting in accordance with the following.
 - a) Copies of all RM 9 test forms which either document a deviation or re-establishment of normal operation following a deviation shall be submitted to Ecology as part of the monthly deviation reports as required by Standard Condition 1.13.1. In addition to the RM 9 form, reporting shall also include copies of the visible emission observation form(s) as well as the information required under recordkeeping under 3), c) above. The permittee is not required to submit RM 9 forms for tests conducted under 2), b), ii) above, which do not document a deviation or violation.
 - b) Upon discovery that the monitoring as designed is insufficient to provide indications of all deviations, the permittee shall notify Ecology of the monitoring deficiency.

[WAC 173-401-615(1)(b), & (3), 09/16/02], [WAC 173-401-630(1), 09/16/02]

- 5M.** During the first period for which compliance is certified under this renewal AOP, the permittee shall perform a review of the Operation and Maintenance manuals, permit application materials (Notice of Construction, PSD) and other relevant documents (Ash Handling and Disposal Plan, Fugitive Dust Control Plan) for the purpose of evaluating compliance with each condition for which this MRRR is referenced. The focus of this review shall be to verify that plant operations are being conducted in accordance with the documents stated above and with good air pollution control practices in mind at the time of the initial review.

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

The permittee shall maintain records that include the date such reviews occur as well as the name of the person conducting the review. Upon discovery that any equipment is being operated in a manner inconsistent with any of the above mentioned documents, the permittee shall initiate corrective action within two (2) business days. All such discoveries shall be reported to Ecology as required by Standard Condition 1.13.1 of this permit.

[WAC 173-401-615(1)(b), (c), 09/16/02]

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

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

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

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

[WAC 173-401-615(1)(b), 09/16/02]

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

Annually – As part of the annual emissions inventory submittal required under Standard Condition 1.13.5, emissions shall be quantified by multiplying the appropriate recorded operating parameter (fuel usage, hours of operation, steam production, etc..) by an emission factor derived from the most recent source testing. If test-derived factors are unavailable, use the most recent emission factor published by USEPA. In the event that the most recent published data provides a range of emission factors, the calculation shall be performed using the most conservative factor within the provided range. Use of less conservative emission factors may be used only upon written approval by Ecology. In the event that USEPA emission factors are either inappropriate or unavailable, the permittee shall propose an alternative emission factor (or emission estimation method) that may be used upon written approval by Ecology.

Calculations should be adjusted for percent oxygen as required by the applicable requirement and should indicate pollutant emission rate and concentration in the same units as the limit(s) specified in the applicable requirement(s). The emission inventory submittal shall include a statement clearly indicating the emission factor that is being used, justification for the use of the emission factor, clear identification of all operating parameters used in the calculational method, and an example of the calculational method used.

[WAC 173-401-615(1)(b), 09/16/02], [Order No. DE 99AQ-E103, Issued 01/19/99, Approval Condition 7.3]

8M. Source testing as referenced shall be conducted at least once every five years.

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

Annually – As part of the annual emissions inventory submittal required under Standard Condition 1.13.5, emissions shall be quantified by multiplying the appropriate recorded operating parameter (fuel usage, hours of operation, steam production, etc..) by an emission factor derived from the most recent source testing.

Calculations should be adjusted for percent oxygen or percent carbon dioxide as required by the applicable requirement and should indicate pollutant emission rate and concentration in the same units as the limit(s) specified in the applicable requirement(s). The emission inventory submittal shall include a statement clearly indicating the emission factor that is being used, justification for the use of the emission factor, clear identification of all operating parameters used in the calculational method, and an example of the calculational method used.

[WAC 173-401-615(1)(b), 09/16/02]

CYCLONES AND BAGHOUSES

9M. The following monitoring, recordkeeping, and reporting shall apply to the cyclones, baghouses and plywood plant in general. Requirements that specify a unit or process apply only to that process. Requirements that are stated generally, apply generally.

- 1) The following recordkeeping shall be maintained for the plywood facility and baghouses:
 - a) Annual plywood production (expressed as 3/8 inch plywood equivalent).
 - b) Regular maintenance records for baghouses #1 and #2.
 - c) Records documenting the nature and details of situations (emergency or otherwise) in which the facility was operated while baghouse #2 was not operating properly.
 - d) A file of any future performance test reports for baghouse #2.
 - e) The O&M manuals for baghouses #1 and #2.
- 2) The following monitoring equipment and facilities shall be available or continue to be operated on baghouse #1:
 - a) Pressure sensors and gauges to indicate the air pressure at the inlet and outlet of the baghouse (or differential pressure across the baghouse).
 - b) A pressure gauge on the reverse air cleaning system.
 - c) Access ports in the baghouse ducting located upstream and downstream of the baghouse.
- 3) The following monitoring equipment and facilities shall be available or continue to be operated on baghouse #2:
 - a) Differential pressure gauge across the baghouse inlet and outlet.
 - b) Access ports in the baghouse ducting located upstream and downstream of the baghouse.
- 4) The following information shall be reported as part of each semi-annual monitoring report:
 - a) Total plywood production (square feet of 3/8" equivalent plywood).

[Order No. DE 93AQ-E114 First Amendment, Issued 03/15/95, Approval Condition 1], [Order No. DE 94AQ-E111 1st Amendment, Issued 01/08/03, Approval Conditions 5 and 6], [Order No. DE 99AQ-E103, Issued 01/19/99, Approval Conditions 3.2, 3.3, 6.1, 6.2, 6.3], [Order No. DE 92AQ-E152 Second Amendment, Issued 01/25/94, Approval Condition 1]

10M. The permittee shall create, follow, and maintain O&M manuals for baghouses #1 and #2. The O&M manuals shall be maintained in an up-to-date manner, well organized, and easily accessible for inspection by Ecology personnel. Emissions that result from failure to follow the requirements of the O&M manuals or manufacturers instructions may be considered proof that the equipment was not properly operated, maintained and tested. Manufacturer's information may be referenced rather than included in the manuals. The following minimum information shall be included each manual:

- 1) Normal operating parameters for each baghouse,
- 2) A maintenance schedule for each baghouse,
- 3) A list of all monitoring and recordkeeping requirements that apply to each baghouse,
- 4) A description of any monitoring procedures that apply to each baghouse,
- 5) A full description of the monitoring instrumentation on each baghouse,
- 6) A description of actions taken due to abnormal system operation, and

- 7) Bag failure records which show the location of failed bags in relation to bag configuration as well as the date of replacement.

[Order No. 94AQ-E111 1st Amendment, Issued 01/08/03, Approval Conditions 6, 6.1, 6.2, 6.3, 6.4, 6.5, 6.6], [Order No. 99AQ-E103, Issued 01/19/99, Approval Conditions 3.1, 4, 4.1, 4.2, 4.3, 4.4, 4.5], [WAC 173-401-630(1), 09/16/02]

VENEER DRYERS, FLUID BED COMBUSTORS, AND VENTURI SCRUBBER

11M. The following monitoring, recordkeeping, and reporting shall apply to the veneer dryers, fluid bed combustors, and the venturi scrubber. Requirements that specify a unit or process apply only to that process. Requirements that are stated generally, apply generally.

- 1) The following monitoring shall be performed and equipment remain installed and be operated as specified:
 - a) Equipment necessary to monitor the temperature of the gas stream in the blend box and the fire box.
 - b) Equipment that monitors continuously the pressure drop (inches of water) across as well as the water flowrate through, the venturi scrubber.
- 2) The following recordkeeping shall be maintained:
 - a) Annual veneer dryer production (expressed as 3/8 inch plywood equivalent).
 - b) Regular maintenance records for veneer dryers #3 and #4 and the venturi scrubber.
 - c) Inspection records for veneer dryer #4.
 - d) Records of emission testing on the venturi scrubber.
 - e) Hours of operation for the veneer dryers, fluid bed combustors, and venturi scrubber.
 - f) Records documenting the operating rates of the veneer dryers and the fluid bed combustors.
- 3) The following information shall be reported as part of each semi-annual monitoring report:
 - a) Information as required by CAM (described under **14M**).

[Order No. 01AQER-1920 1st Amendment, Issued 01/08/03, Approval Conditions 1, 3, 4.1.3], [Order No. DE 92AQ-E152 Second Amendment, Issued 01/25/94, Approval Conditions 5, 7.4], [PSD-X80-01 First Amendment, Issued 02/14/03, Approval Conditions 6a, 6b], [WAC 173-401-615(1)(b), 09/16/02]

12M. The permittee shall create, follow, and maintain O&M manuals for veneer dryers #3 and #4. The O&M manuals shall be maintained in an up-to-date manner, well organized, and easily accessible for inspection by Ecology personnel. Emissions that result from failure to follow the requirements of the O&M manuals or manufacturers instructions may be considered proof that the equipment was not properly operated, maintained and tested. Manufacturer's information may be referenced rather than included in the manuals. The following minimum information shall be included each manual:

- 1) Normal operating parameters for dryers #3 and #4 as well as the ventilation and emission control system (fans, ducting, scrubber, etc...),
- 2) A maintenance schedule for dryers #3 and #4 as well as the ventilation and emission control system (fans, ducting, scrubber, etc...),
- 3) A list of all monitoring and recordkeeping requirements that apply to dyers #3 and #4,

- 4) A description of any monitoring procedures that apply to dryers #3 and #4, and
- 5) A description of actions taken in response to abnormal control system operation.

[Order No. 01AQER-1920 1st Amendment, Issued 01/08/03, Approval Conditions 3, 3.1, 3.2, 3.3, 3.4], [Order No. DE 92AQ-E152 Second Amendment, Issued 01/25/94, Approval Conditions 6, 6.1, 6.2, 6.3, 6.4, 6.5]

13M. Periodic performance testing shall be conducted on the emissions from the scrubber stack at least once every five (5) years. The five (5) year cycle shall be measured from the most recent source testing (which occurred on August 27, 2002). The following conditions shall apply to all future testing:

- 1) Particulate matter shall be reported for fronthalf (RM 5) and backhalf (RM 202). Particulate matter emissions shall be reported in grains per dry standard cubic foot of exhaust gas (gr/dscf) as well as pounds per hour (lb/hr).
- 2) Testing shall be conducted for all pollutants of concern with regard to the emission unit as determined by Ecology. The appropriate EPA reference method shall be used for testing of each pollutant. Pollutant emission rates for NO_x, SO₂, CO, and HC/VOC shall be reported in terms consistent with the applicable requirement or as specified by Ecology.
- 3) The testing shall consist of at least three (3) runs, with the plywood plant operating at a minimum of ninety (90) percent of maximum production rate.
- 4) All monitored operating parameters for the scrubber, fluid bed combustors, and veneer dryers shall be recorded periodically during the entire duration of the testing and submitted as part of the test report.
- 5) Opacity observations using RM 9 shall be conducted for at least one six minute period during each run of the source testing. The results of each RM 9 test shall be submitted as part of the test report.
- 6) An independent testing firm shall conduct the testing and shall submit a test plan for Ecology approval at least thirty (30) days prior to the source testing.
- 7) The permittee shall notify Ecology of the date of the source testing at least thirty (30) days prior to the date of testing. The permittee shall notify Ecology as soon as possible if any planned source testing is cancelled or rescheduled.
- 8) The test report shall be sent to Ecology within sixty (60) days after the testing.
- 9) Alternate methods of testing and alternate testing requirements may be proposed by the permittee in writing to Ecology. Permission for use of alternate forms of testing and requirements must be approved in writing by Ecology.

[Order No. 01AQER-1920 1st Amendment, Issued 01/08/03, Approval Conditions 4, 4.1, 4.1.2], [WAC 173-401-615(1)(b), 09/16/02], [WAC 173-401-630(1), 09/16/02]

14M. Monitoring, Recordkeeping, and Reporting as required by 40 CFR 64 – CAM shall be subject to the following general conditions:

- 1) The owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emission unit is operating, with the following qualifications:
 - a) Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement.

- b) The owner or operator shall use all data collected during all other periods in assessing the operation of the control device and associated control system.
- c) "Monitoring malfunction" is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

[40 CFR 64.7(a), 07/01/02], [40 CFR 64.7(c), 07/01/02]

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

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

[40 CFR 64.9(a), 07/01/02]

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

- a) The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan(s) required as well as any activities undertaken to implement a quality improvement plan, and any other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).
- 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), 07/01/02]

15M. The following shall function as Compliance Assurance Monitoring for the fluid bed combustors and veneer dryers controlled by the wet venturi scrubber.

1) The permittee shall conduct monitoring in accordance with the following.

- a) Equipment shall be provided that monitors, and displays continuously, venturi scrubber pressure drop in inches of water (in. w.c.) and venturi scrubber water flowrate in gallons per minute (gpm).
- b) At least once per day, the permittee shall evaluate the data obtained through recordkeeping as described in 2) below with respect to the following criteria:

i) With regard to venturi scrubber pressure drop:

The twenty-four (24) hour average pressure drop shall be at least 10 in. w.c.

ii) With regard to venturi scrubber water flowrate:

The twenty-four (24) hour average water flowrate shall be at least 1400 gpm as displayed.

- c) Under conditions that meet the criteria outlined in 1) b) above, no corrective action is required under CAM.
- d) In the event that either of the criteria outlined in 1) b) above are not met, corrective action consistent with the following shall be taken.

- i) As soon as possible, but no later than four (4) hours after discovery of the deviation, the permittee shall initiate corrective actions that are designed to return the equipment to normal operation as soon as possible and to prevent the likely recurrence of the cause of the deviation.
- 2) The permittee shall conduct recordkeeping in accordance with the following.
 - a) At least once every fifteen (15) minutes, the venturi scrubber pressure drop and the venturi scrubber water flowrate shall be recorded by the automatic data recording equipment. On a monthly basis, the data shall be evaluated in order to calculate the daily mean value for both venturi scrubber pressure drop and water flowrate for each day (24-hour period) within the month.
 - b) At least once per 8-hour shift, the instantaneous values for venturi scrubber pressure drop and water flowrate as displayed in the control room shall be recorded by plant personnel in direct operation of the scrubber. If any instantaneous reading indicates that the value of either pressure drop or water flowrate is outside the acceptable ranges (as specified under 1) b) above) another instantaneous value shall be recorded within one hour to establish that the pressure drop or flowrate returned to the acceptable range.
 - c) In the event of a deviation from the criteria outlined in 1) c) above, the permittee shall maintain records documenting any corrective action taken, and the results of such action. The records shall be retained in a well organized manner and easily accessible for inspection by Ecology personnel.
 - 3) The permittee shall conduct reporting in accordance with the following.
 - a) In the event of a deviation from the criteria outlined in 1) c) above, the permittee shall submit a report as part of, or attached to, the monthly deviation report as described in Standard Condition 1.13.1. The report shall include the appropriate data as recorded documenting the date, time and duration of the deviation, the magnitude of the deviation, an estimate of the excess emissions, a description of the corrective action taken, and the results of the corrective action.
 - b) Upon discovery that the monitoring as designed is insufficient to provide indications of all deviations, the permittee shall notify Ecology of the monitoring deficiency.

[40 CFR 64.3, 64.4(d), 64.7(d), 64.7(e), 64.8, 07/01/02]

HOGGED FUEL BOILER AND ELECTRIFIED FILTER BED

16M. The following monitoring, recordkeeping, and reporting shall apply to the hogged fuel boiler and the electrified filter bed. Requirements that specify a unit or process apply only to that process. Requirements that are stated generally, apply generally.

- 1) The following monitoring shall be performed and equipment installed as specified:
 - a) A daily monitoring log shall be maintained with the following parameters for the electrified filter bed/multiclone control system recorded at least once per day:
 - i) EFB Bed voltage (KVDC),
 - ii) EFB Ionizer voltage (KVDC),
 - iii) EFB Ionizer current (Amps),
 - iv) EFB Inlet temperature (°F),
 - v) EFB Outlet temperature (°F),
 - vi) EFB differential pressure (in. w.c.),

- vii) Multiclone differential pressure (in. w.c.),
 - viii) Time of day.
 - b) A daily monitoring log shall be maintained with the following parameters for the hogged fuel boiler recorded at least once per day:
 - i) Steam production (lbs/hour),
 - ii) Stack temperature (°F),
 - iii) Boiler O₂ (%),
 - iv) Pressure (in. w.c.) at the following locations: boiler under grate, boiler outlet, furnace pressure, F.D. fan outlet, and furnace draft,
 - v) Time of day.
 - c) Equipment shall continue to be operated providing continuous measurement of the oxygen content (% O₂) of the hogged fuel boilers exhaust gas. The continuous measurement equipment shall conform to 40 CFR 60, Appendix B, Performance Specification 3. The Quality Assurance Plan as submitted to Ecology shall be updated upon request by Ecology
- 2) The following recordkeeping shall be maintained:
- a) Records documenting the operating rate of the hogged fuel boiler.
 - b) Records documenting the nature and details of any situation in which the abort gate located downstream of the multiclone on the hogged fuel boiler is utilized and boiler exhaust gases bypass the EFB.
- 3) The following reporting shall be submitted in accordance with Standard Condition 1.13.2:
- a) Total hogged fuel boiler steam production.
 - b) A photocopy of the daily log for the day in which the boiler was operated at its highest rate during the reporting period.
 - c) Reports documenting deviations from permit conditions as required by Standard Condition 1.13.1.
 - d) Reporting as required by CAM (**22M**).

[PSD-X80-01 First Amendment, Issued 02/14/03, Approval Condition 6b], [Order No. DE 91AQ-E123, Issued 11/08/91, Approval Conditions 1(c), 6, 7]

- 17M.** Periodic performance testing shall be conducted on the emissions from the electrified filter bed (controlling the hogged fuel boiler) stack at least once every three (3) years. The three (3) year cycle shall be measured from the most recent source testing (which occurred on May 30, 2001). The following conditions shall apply to all future testing:
- 1) Particulate matter shall be reported for fronthalf (RM 5) and backhalf (RM 202). Particulate matter emissions shall be reported in grains per dry standard cubic foot of exhaust gas (gr/dscf) as well as pounds per hour (lb/hr).
 - 2) Testing shall be conducted for all pollutants of concern with regard to the emission unit as determined by Ecology. The appropriate EPA reference method shall be used for testing of each pollutant. Pollutant emission rates for NO_x, SO₂, CO, and HC/VOC shall be reported in terms consistent with the applicable requirement or as specified by Ecology.

- 3) The testing shall consist of at least three (3) runs, with the boiler operating at a minimum of ninety (90) percent of maximum production rate. The maximum production rate shall be the highest weekly average production rate over the past two (2) years.
- 4) The testing will consist of two runs at normal boiler operation and one run with a grate ash cleaning and/or soot blowing evolution in progress.
- 5) All monitored boiler operating parameters shall be recorded during the entire duration of the testing and submitted as part of the test report.
- 6) Opacity observations using RM 9 shall be conducted for at least one six minute period during each run of the source testing. The results of each RM 9 test shall be submitted as part of the test report.
- 7) An independent testing firm shall conduct the testing and shall submit a test plan for Ecology approval at least thirty (30) days prior to the source testing.
- 8) The permittee shall notify Ecology of the date of the source testing at least thirty (30) days prior to the date of testing. The permittee shall notify Ecology as soon as possible if any planned source testing is cancelled or rescheduled.
- 9) The test report shall be sent to Ecology within sixty (60) days after the testing.
- 10) Alternate methods of testing and alternate testing requirements may be proposed by the permittee in writing to Ecology. Permission for use of alternate forms of testing and requirements must be approved in writing by Ecology.

[Order No. DE 91AQ-E123, Issued 11/08/91, Approval Conditions 1, 3], [WAC 173-401-615(1)(b), 09/16/02], [WAC 173-401-630(1), 09/16/02]

18M. Monitoring – A Continuous Opacity Monitoring System (COMS) which meets the approval requirements of the Environmental Protection Agency, is installed and shall be maintained. The COMS shall conform to all provisions of Title 40, CFR Part 60, Appendix B, *Performance Specification 1 – Specifications and Test Procedures for Opacity Continuous Emissions Monitoring Systems in Stationary Sources*. The COMS shall be operated using quality assurance procedures conforming to *EPA 340/1-86-010, Recommended Quality Assurance Procedures of Opacity CEMS*. The permittee shall prepare a Quality Assurance (QA) Plan outlining the quality assurance procedures used to verify the reliability of the COMS data. Such a document shall specify the frequency at which each quality assurance procedure will be performed.

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

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

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

[Order No. DE 91AQ-E123, Issued 11/08/91, Approval Condition 1(b)], [WAC 173-401-630(1), 009/16/02]

19M. The permittee shall create, follow, and maintain O&M manuals for the hogged fuel boiler, multiclone and EFB. The O&M manuals shall be maintained in an up-to-date manner, well organized, and easily accessible for inspection by Ecology personnel. Emissions that result from failure to follow the

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

[Order No. DE 91AQ-E123, Issued 11/08/91, Approval Condition 4]

20M. The maximum hourly average production rate for the hogged fuel boiler shall be determined as follows:

- 1) For the period May 1st through September 30th, the maximum rate shall be 40,000 lbs steam/hour.
- 2) For the period October 1st through April 30th, the maximum rate shall be 45,000 lbs steam/hour.
- 3) Steam production rates recorded during each source test shall establish maximum hourly average steam production rates, except that they shall not exceed the production rate limits specified in 1) and 2) above.

[Order No. DE 78-459, Issued 10/24/78, Approval Condition 3], [Order No. DE 91AQ-E123, Issued 11/08/91, Approval Conditions 2, 5]

21M. The following conditions shall apply to use of the hogged fuel boiler abort gate:

- 1) The abort gate shall be used only in emergency situations caused by one of the following:
 - a) Failure of the EFB FD fan,
 - b) Fire in the EFB system,
 - c) Power outage to the EFB, or
 - d) Plugging of the EFB filter media.
- 2) Whenever the abort gate is used, fuel feed to the boiler must be stopped and the boiler taken off line.
- 3) Notification to Ecology shall be taken as required under Standard Condition 1.13.1.
- 4) Records of the abort gate usage shall be maintained as specified under **16M**.
- 5) Under no circumstances shall the boiler be operated when exhaust gases bypass the EFB.

[Order No. DE 91AQ-E123, Issued 11/08/91, Approval Condition 6]

22M. The following shall function as Compliance Assurance Monitoring for the hogged fuel boiler controlled by a multiclone and electrified filter bed (EFB).

- 1) The permittee shall conduct monitoring in accordance with the following.
 - a) Equipment shall be provided that monitors, and displays continuously, multiclone pressure drop in inches of water (in. w.c.), electrified filter bed (EFB) voltage in kilovolts (kV) DC, EFB current in amps, and EFB inlet and outlet gas stream temperatures in degrees Fahrenheit (°F).
 - b) At least once per day, the permittee shall evaluate the data obtained through recordkeeping as described in 2) below with respect to the following criteria:
 - i) With regard to multiclone pressure drop:
The two-day average pressure drop shall be between 1" and 5" w.c.
 - ii) With regard to EFB pressure drop:
The two-day average pressure drop shall be below 6" w.c.
 - iii) With regard to EFB bed voltage:
The two-day average voltage shall be at least 5.0 kV.

iv) With regard to EFB ionizer voltage:

The two-day average voltage shall be at least 20 kV.

- c) Under conditions that meet the criteria outlined in 1) b) above, no corrective action is required under CAM.
- d) In the event that either of the criteria outlined in 1) b) above are not met, corrective action consistent with the following shall be taken.
- i) As soon as possible, but no later than four (4) hours after discovery of the deviation, the permittee shall initiate corrective actions that are designed to return the equipment to normal operation as soon as possible and to prevent the likely recurrence of the cause of the deviation.
- 2) The permittee shall conduct recordkeeping in accordance with the following.
- a) At least once per eight (8) hour shift, the multiclone pressure drop in inches of water (in. w.c.), electrified filter bed (EFB) bed voltage in kilovolts (kV) DC, EFB ionizer current in amps, EFB ionizer voltage in kV and EFB inlet and outlet gas stream temperatures in degrees Fahrenheit (°F) shall be recorded. With regard to the electrical parameters on the EFB, the permittee shall adjust the EFB ionizer power control knob so that the ionizer voltage is equal to or greater than 20 kilovolts and then the ionizer voltage and current shall be recorded. Additionally, in the event that the EFB bed voltage is below 5 kV, the permittee shall adjust the EFB bed power control knob to raise the voltage above 5 kV.
- b) In the event of a deviation from the criteria outlined in 1) c) above, the permittee shall maintain records documenting any corrective action taken, and the results of such action. The records shall be retained in a well organized manner and easily accessible for inspection by Ecology personnel.
- 3) The permittee shall conduct reporting in accordance with the following.
- a) In the event of a deviation from the criteria outlined in 1) c) above, the permittee shall submit a report as part of, or attached to, the monthly deviation report as described in Standard Condition 1.13.1. The report shall include the appropriate data as recorded documenting the date, time and duration of the deviation, the magnitude of the deviation, an estimate of the excess emissions, a description of the corrective action taken, and the results of the corrective action.
- b) Upon discovery that the monitoring as designed is insufficient to provide indications of all deviations, the permittee shall notify Ecology of the monitoring deficiency.

[40 CFR 64.3, 64.4(d), 64.7(d), 64.7(e), 64.8, 07/01/02]

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 shall 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
WAC 173-400-040(3)(b)	Fugitive Emissions in a Non-Attainment Area	As of permit issuance, the permittee is located in an area classified attainment for all criteria pollutants.
WAC 173-400-040(8)(b)	Fugitive Dust Sources	As of permit issuance, the permittee is located in an area classified attainment for all criteria pollutants and has not been identified as a significant contributor to a PM-10 nonattainment area.
WAC 173-400-105(5)	Continuous Opacity Monitors on Wood Waste Boilers	The hogged fuel boiler operated by the permittee has a steam production capacity of 45,000 lb/hr (as de-rated by Order No. DE 78-459). An Ecology inspection performed on September 6, 2001 recorded the pressure of the steam produced by the boiler as 126 pounds per square inch (psi). This pressure is assumed to be gage pressure. Using the saturated steam pressure tables included in Cameron’s Hydraulic Data handbook published by Ingersoll-Rand Company, the heating value of steam at 140 psi (absolute, 126 gage + 14.7 atmospheric) is 1193.0 Btu/lb. This works out to a steam production capacity of 53.69 MMBtu/hr, which is significantly below the 100 MMBtu/hr trigger necessary for WAC 173-400-105(5)(d) to be applicable.

Inapplicable Requirement	Requirement Description	Explanation
chapter 173-433 WAC	Emission Standards for Solid Fuel Burning Devices	<p>A literal reading of WAC 173-433 and RCW 70.94.453(5) could lead to the conclusion that all solid fuel burning devices, without consideration of size, fall under the definition of this regulation/statute. The definition of solid fuel burning device is, “any device for burning wood, coal, or any other nongaseous and non-liquid fuel, including a wood stove and a fireplace.”</p> <p>However, this definition, when read together with the policy statement of RCW 70.94.450 clearly indicates that the concern of the Washington State Legislature was emissions from wood stoves. RCW 70.94.450 and RCW 70.94.453 are two adjacent sections in Chapter 405 of the Laws of 1987. While it might be reasonable for the policy statement of RCW 70.94.450 to lead the Legislature to regulate other solid fuel burning space heating devices similar to wood stoves, it does not seem reasonable that such a policy statement would lead to regulation of a large industrial unit such as a hogged fuel boiler. Based upon this interpretation of the intention of RCW 70.94.453, WAC 173-433 was found to be inapplicable to the permittee. WAC 173-433 would be applicable if a wood stove, fireplace or similar device were present at the source.</p>