

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

IN THE MATTER OF THE COMPLIANCE BY  
PONDERAY NEWSPRINT COMPANY  
Located in Usk, Washington with Section 70.94.161  
RCW, Operating Permits for Air Contaminant  
Sources, and the applicable rules and regulations of  
the Department of Ecology

AIR OPERATING PERMIT  
No. 08AQE-253  
  
FINAL

**To** Ponderay Newsprint Company  
422767 SR 20  
Usk, WA, 99180-9771

Issuance Date: April 22,2010  
Effective Date: April 22, 2010  
Expiration Date: April 21,2015

**Responsible Official:** Mr. Paul Machtolf

**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, Ponderay Newsprint Company is called the permittee. The permittee is required to comply with the provisions contained within this permit.

This Air Operating Permit, DATED at Spokane, Washington, this 21st day of April, 2010.

PREPARED BY:

REVIEWED BY:

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## TABLE OF CONTENTS

|   |          |
|---|----------|
| List of Abbreviations-----  | 3        |
| <b>1. PERMIT PROVISOS-----</b>  | <b>4</b> |
| 1.1 Permit Shield-----  | 4        |
| 1.2 Property Rights -----   | 4        |
| 1.3 Severability-----   | 4        |
| 1.4 Enforceability -----  | 4        |
| 1.5 General Obligation -----  | 4        |
| 1.6 Permit Actions -----  | 5        |
| 1.7 Permit Continuation-----  | 4        |
| 1.8 Permit Appeals -----  | 5        |
| 1.9 Need to Halt or Reduce Activity Not a Defense-----                          | 5        |
| 1.10 Reasonably Available Control Technology -----                              | 5        |
| <b>2. PERMIT ADMINISTRATION -----</b>   | <b>5</b> |
| 2.1 Duty to Comply-----   | 5        |
| 2.2 Compliance Schedules-----   | 5        |
| 2.3 Permit Renewal and Expiration -----   | 5        |
| 2.4 Duty to Provide Information-----  | 6        |
| 2.5 Duty to Supplement or Correct Application-----                              | 6        |
| 2.6 Permit Fees -----   | 6        |
| 2.7 Inspection and Entry -----  | 6        |
| 2.8 Recordkeeping -----   | 7        |
| 2.9 Reporting -----   | 7        |
| 2.9.1 Deviation Reports -----   | 7        |
| 2.9.2 Semi-Annual Monitoring Reports -----                                      | 8        |
| 2.9.3 NSPS Excess Emissions Reports -----                                       | 8        |
| 2.9.4 Compliance Certifications -----   | 9        |
| 2.9.5 Emission Inventory -----  | 10       |
| 2.9.6 Submittals -----  | 10       |
| 2.10 Excess Emissions-----  | 11       |
| 2.11 Federal Chlorofluorocarbons (CFC) Requirements – Title VI of the FCAA----- | 12       |
| 2.12 Circumvention to conceal a violation of an NSPS Standard-----              | 13       |
| 2.13 Insignificant Emission Units-----  | 13       |
| <b>3. PERMIT CHANGES</b>  |          |
| 3.1 Changes Not Requiring Permit Revisions -----                                | 13       |
| 3.2 Off-Permit Changes -----  | 14       |
| 3.3 Reopening For Cause -----   | 15       |
| 3.4 Administrative Permit Amendments -----                                      | 15       |
| <b>4. APPLICABLE WHEN TRIGGERED REQUIREMENTS</b>                                |          |
| 4.1 New Source Review -----   | 16       |
| 4.2 NSPS Notification of Physical or Operational Change -----                   | 16       |
| 4.3 Replacement or Alteration of Emission Control Technology-----               | 16       |
| 4.4 Demolition and Renovation (Asbestos)-----                                   | 16       |
| 4.5 Source testing (general) -----  | 17       |
| 4.6 NSPS testing requirements-----  | 17       |
| 4.7 MACT Construction or Reconstruction-----                                    | 18       |

**5. EMISSION LIMITATIONS AND WORK PRACTICE REQUIREMENTS ----- 19**  
    5.1 Facility Wide----- 20  
    5.2 Nebraska Boiler ----- 23  
    5.3 Fluidized Bed Boiler----- 24  
    5.4 Thermo-Mechanical Pulping ----- 26  
    5.5 Paper Machine Dryer Section----- 28  
    5.6 Paper Machine, Wet End ----- 29  
    5.7 Bleaching System ----- 29

**6. MONITORING, RECORDKEEPING, REPORTING REQUIREMENTS (MRRR)----- 30**  
**7. PERMIT SHIELD----- 42**

**ATTACHMENT 1: List of Emission Units ----- 46**  
**ATTACHMENT 2: Insignificant Emission Units ----- 48**

**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   |
| FDCCP           | Fugitive Dust Control Plan                                    |
| ft <sup>3</sup> | Cubic foot  |
| gr/dscf         | Grain per dry standard cubic foot                             |
| hr              | Hour  |
| MMBtu           | Million British Thermal Units                                 |
| MRRR            | Monitoring, Recordkeeping, and Reporting Requirement          |
| MVAC            | Motor Vehicle Air Conditioner                                 |
| N <sub>2</sub>  | Nitrogen gas  |
| NOC             | Notice of Construction  |
| NO <sub>x</sub> | Oxides of Nitrogen  |
| NSPS            | New Source Performance Standard                               |
| O <sub>2</sub>  | Oxygen  |
| O&M             | Operation & Maintenance                                       |
| P.E.            | Professional Engineer   |
| PM              | Particulate Matter  |
| PM-10           | Particulate Matter with aerodynamic diameter ≤ 10 micrometers |
| ppm             | Parts per million   |
| 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 |
| scfm            | Standard Cubic Feet per Minute                       |
| SIP             | State Implementation Plan                            |
| SO <sub>2</sub> | Sulfur Dioxide                                       |
| TAP             | Toxic Air Pollutant (per WAC 173-460)                |
| TPD             | Tons Per Day   |
| TPY             | Tons Per Year  |
| TSP             | Total Suspended Particulate                          |
| VOC             | Volatile Organic Compound                            |
| WAC             | Washington Administrative Code                       |

All submittals required by this permit to be submitted to the Department of Ecology, the Environmental Protection Agency (EPA), or both as specified by the applicable requirement, shall be submitted to the following addresses.

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

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

## STANDARD CONDITIONS

### 1. PERMIT PROVISOS

#### 1.1 Permit Shield

- 1.1.1 Compliance with the terms and conditions of this permit shall be deemed compliance with those applicable requirements that are specifically included and identified in this permit as of the date of permit issuance.
- 1.1.2 The permit shield shall not apply to any insignificant emissions unit or activity designated under WAC 173-401-530. [WAC 173-401-530(3), 09/16/02], [WAC 173-401-640(1), 09/16/02]

**1.2 Property Rights:** This permit does not convey any property rights of any sort, or any exclusive privilege.

**1.3 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)]

**1.4 Enforceability:** All terms and conditions of the permit are enforceable by the EPA and citizens unless specifically designated as state-only enforceable. [WAC 173-401-625, 09/16/02]

**1.5 General Obligation:** Nothing in this permit shall alter or affect the following:

- 1.5.1 Provisions of section 303 of the FCAA (emergency orders), including the authority of EPA under that section.
- 1.5.2 The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance.
- 1.5.3 The applicable requirements of the acid rain program, consistent with section 408(a) of the FCAA.
- 1.5.4 The ability of EPA to obtain information from a source pursuant to section 114 of the FCAA.

**1.5.5** The ability of Ecology to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in chapter 252, Laws of 1993. [WAC 173-401-640(4), 09/16/02]

**1.6 Permit Actions:** This operating permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [WAC 173-401-620(2)(c), 09/16/02]

**1.7 Permit continuation** This permit and all terms and conditions contained therein, including any permit shield provided under WAC 173-401-640, shall not expire until the renewal permit has been issued or denied if a timely and complete renewal application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect until the renewal permit has been issued or denied if a timely and complete renewal application has been submitted.  
[WAC 173-401-620(2)(j), 9/16/02]

**1.8 Permit Appeals** This permit or any conditions in it may be appealed only by filing an appeal with the Pollution Control Hearings Board, P.O. Box 40903, Olympia, WA 98504-0903 and 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]

**1.9 Need to Halt or Reduce Activity not a Defense** It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [WAC 173-401-620(2)(b), 09/16/02]

**1.10 Reasonably Available Control Technology** Emission standards and other requirements contained in rules or regulatory orders in effect at the time of operating permit issuance or renewal shall be considered RACT for purpose of permit issuance or renewal. This does not preclude RACT determinations under Section 8, Chapter 252, Laws of 1993, which shall be incorporated into an operating permit as provided in WAC 173-401-730. [WAC 173-401-605(3)l, 9/16/02; RCW 70.94.154, 2005 (S)]

## 2. PERMIT ADMINISTRATION

**2.1 Duty to Comply** The permittee must comply with all conditions of this chapter 173-401 operating permit. Any permit noncompliance constitutes a violation of chapter 70.94 RCW and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application. [WAC 173-401-620(2)(a), 09/16/02], [Order No. 00AQER-1819, 3<sup>rd</sup> Amendment, Issued 03/01/2010, Approval Condition 8.6]

**2.2 Compliance Schedules** The permittee shall continue to comply with applicable requirements with which it is currently in compliance. The permittee shall meet applicable requirements on a timely basis that become effective during the permit term. [WAC 173-401-510(2)(h)(iii)(A), 09/16/02], [WAC 173-401-510(2)(h)(iii)(B), 09/16/02]

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

2014. 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]

**2.4 Duty to Provide Information** The permittee shall furnish to Ecology, within a reasonable time, any information that Ecology may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to Ecology copies of records required to be kept by this permit or, for information claimed to be confidential, the permittee may furnish such records directly to Ecology along with a claim of confidentiality. Ecology shall maintain confidentiality of such information in accordance with RCW 70.94.205. No person shall make any false material statement, representation or certification in any form, notice or required report. No person shall render inaccurate any required monitoring device or method. [WAC 173-401-620(2)(e), 09/16/02], [WAC 173-400-105(7), (8), 8/20/93, 9/6/07(S)]

**2.5 Duty to Supplement or Correct Application** The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application shall promptly submit such supplementary facts or corrected information. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit. [WAC 173-401-500(6), 09/16/02].

**2.6 Permit Fees** The permittee shall pay fees as a condition of this permit in accordance with Ecology's fee schedule. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in chapter 70.94 RCW. Ecology may revoke this operating permit if the permit fees are not paid, per WAC 173-401-930(3). [WAC 173-401-620(2)(f), 930(3), 09/16/02], [RCW 70.94.162(1), 1/4/01 (S)]

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

- 2.7.1** Enter upon the permittee's premises where a chapter 401 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
- 2.7.2** Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- 2.7.3** Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
- 2.7.4** As authorized by WAC 173-400-105 and the FCCA, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.
  - 2.7.4.1** Ecology may require the permittee to conduct stack testing and/or ambient air monitoring and report the results to Ecology.
  - 2.7.4.2** Ecology may conduct or require that a test be conducted using approved methods from 40 CFR parts 51, 60, 61 and 63 (in effect on February 20, 2001), or the *Ecology Source Test Manual September 20, 2004*. The permittee shall be required to provide platform and sampling ports. Ecology shall be allowed to obtain a sample from any emissions unit. The permittee shall be given the opportunity to observe the sampling and to obtain a sample at the same time.

- 2.7.5 No person shall obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties.
- 2.7.6 Nothing in this condition shall limit the ability of Ecology or the EPA to inspect or enter the premises of the permittee under Section 114 or other provisions of the FCAA.

[WAC 173-401-630(2), 09/16/02], [WAC 173-400-105(2),(4), 8/20/93, 9/6/07(S)], [RCW 70.94.200, 1/4/01 (S)], [Order No. 00AQER-1819, 3<sup>rd</sup> Amendment, Issued 03/01/2010, Approval Condition 8.1], [40 CFR 60.8(e)]

## 2.8 Record Keeping

- 2.8.1 **Recordkeeping:** the permittee shall keep records of required monitoring information and support data for a period of five years from the date of collection. Records shall include, where applicable, the following:
  - 2.8.1.1 The date, place, and time of the sampling or measurements.
  - 2.8.1.2 The date(s) analyses were performed.
  - 2.8.1.3 The company or entity that performed the analysis.
  - 2.8.1.4 The analytical techniques or methods used.
  - 2.8.1.5 The results of such analyses.
  - 2.8.1.6 The operating conditions as existing at the time of sampling or measurement.  
[WAC 173-401-615(2)(a), (c), 09/16/02]
- 2.8.2 **NSPS Recordkeeping:** the permittee shall maintain the following records for Nebraska Boiler NOx monitoring and FBB opacity monitoring for a period of five years from the date of collection.
  - 2.8.2.1 Records of the occurrence and duration of any startup, shutdown or malfunction of an affected facility; any malfunction of air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.
  - 2.8.2.2 All measurements, including continuous monitoring system, monitoring device, and performance testing measurements.
  - 2.8.2.3 All continuous monitoring system performance evaluations.
  - 2.8.2.4 Results of all continuous monitoring system or monitoring device calibration checks, QA procedures, adjustments and maintenance.  
[40 CFR 60.7(b),(f), 2/12/99]

## 2.9 Reporting

- 2.9.1 **Deviation Reports** The permittee shall report deviations from permit conditions, including those attributable to upset conditions as defined in this permit, and include the following information: the time the deviation occurred, 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 to Ecology at the address included in this permit.
  - 2.9.1.1 Deviations which represent a potential threat to human health or safety must be reported as soon as possible, but in no case later than twelve (12) hours after the deviation is discovered.
  - 2.9.1.2 Excess emissions due to emergency (§2.10.1), or which the source believes unavoidable (§2.10.2) shall be reported within 2 working days of the event.

**2.9.1.3** Other deviations shall be reported no later than thirty days after the end of the month in which the deviation is discovered.

Upon request by Ecology, the permittee shall submit a full written report including further details regarding the known causes, the corrective actions taken, and the preventative measures to be taken to minimize or eliminate the chance of recurrence. The source shall maintain a contemporaneous record of all deviations.

Responsible official certification of all monthly deviation reports submitted during the previous six month period shall be included in each semi-annual monitoring report. [WAC 173-401-615(3)(b), 09/16/02], [WAC 173-400-107, 8/20/93, 9/6/07 (S)], [40 CFR 60.49b(h), 6/13/07], [WAC 173-401-630(1), 09/16/02], [Order No. 00AQER-1819, 3<sup>rd</sup> Amendment, Issued 03/01/2010, Approval Condition 6.3]

**2.9.2 Semi-Annual Monitoring Reports:** The permittee shall submit reports of any required monitoring (i.e., Monitoring Recordkeeping and Reporting identified in section 6) at least once every 6 months. Monitoring periods shall be January 1<sup>st</sup> — June 30<sup>th</sup>, and July 1<sup>st</sup> —December 31<sup>st</sup>. Semi-annual monitoring reports shall be due no later than 45 days following the end of each 6 month period. All instances of deviations from permit requirements must be clearly identified in such reports. Failure to conduct any required monitoring must be reported as a deviation. The report must include identification of all months during which no deviations occurred. The report must include CAM monitoring information specified in subsection (a)(7) of Condition 8M and FBB NO<sub>x</sub> monitoring information specified in subsection (c) of Condition 10M. All semi-annual monitoring reports must be certified by a responsible official consistent with Condition 2.9.6 [WAC 173-401-615(3)(a), 09/16/02]

**2.9.3 NSPS: Excess Emissions and Monitoring Systems Performance Reports.** The permittee shall submit reports quarterly for Nebraska Boiler NO<sub>x</sub> monitoring and semi-annually (except where more frequent reporting is specifically required) for FBB opacity monitoring. Reports shall be postmarked by the end of the 30<sup>th</sup> day following the end of the reporting period. If any semi-annual Excess Emissions and Monitoring Systems Performance Report documents emissions in excess of the limit in condition 5.3.2, the reporting frequency shall be increased to quarterly. If four consecutive quarterly monitoring reports demonstrate compliance with the opacity standard, the reporting frequency may be reduced to semiannually.<sup>1</sup>

**2.9.3.1** If the total duration of excess emissions for the reporting period is 1 percent or greater of the total operating time for the reporting period or the total monitor downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, then both the excess emission report in 2.9.3.3 and the summary report in 2.9.3.4 must be submitted.

**2.9.3.2** If the total duration of excess emissions for the reporting period is less than 1 percent of the total operating time for the reporting period and monitor downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, then only the summary report form in 2.9.3.4 is required unless a complete excess emission report is requested by Ecology or the EPA.

**2.9.3.3** Excess emission reports must contain the following:

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<sup>1</sup> The permittee must notify Ecology of the intent to make the change. If Ecology does not notify the permittee within 45 days of notice, approval is automatically granted.

- 2.9.3.3.1** The magnitude of excess emissions, and the beginning and end time of each time period of excess emissions.
- 2.9.3.3.2** The process operating time during the reporting period.
- 2.9.3.3.3** Identification of each period of excess emissions occurring during startup, shutdowns and malfunctions. Include the nature and cause of any malfunction,
- 2.9.3.3.4** The nature and cause of any malfunction (if known), the corrective actions taken or preventative measures adopted.
- 2.9.3.3.5** The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks, and the nature of repairs or adjustments.
- 2.9.3.3.6** When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information shall be stated in the report.

- 2.9.3.4** A summary report containing the information in 40 CFR 60.7(d) shall be submitted for each pollutant monitored.
- 2.9.3.5** Copies of excess emission reports shall be maintained onsite for at least 5 years in a permanent form and available for inspection.
- 2.9.3.6** No relaxation of reporting frequency is allowed.

[40 CFR 60.49b(g),(h),(6/13/07)], [40 CFR 60.7(c)(1)-(4) (2/12/99)], [40 CFR 60.7(d)(1)&(2), (2/12/99)], [40 CFR 60.7(f), (2/12/99)], [Order No. 00AQER-1819, 3rd Amendment, 03/01/2010, Conditions 3.2.1.3, 3.2.1.3.1, 3.2.1.3.2, 3.2.1.3.3, 3.2.1.3.4, 4.2.2.3, 4.2.2.3.1, 4.2.2.3.2, & 4.2.2.3.3]

**2.9.4 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. 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]

- 2.9.4.1** The certification shall describe and include the following:
  - 2.9.4.1.1** The permit term or condition that is the basis of the certification,
  - 2.9.4.1.2** The current compliance status,
  - 2.9.4.1.3** Whether compliance was continuous or intermittent, and
  - 2.9.4.1.4** The methods used for determining compliance, currently and over the reporting period consistent with WAC 173-401-615(3)(a).
  - 2.9.4.1.5** All compliance certifications shall be submitted to Ecology and EPA Region 10 at the addresses included in this permit.

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

- 2.9.4.2** Where the permit does not require testing, monitoring, recordkeeping and reporting for insignificant emissions units or activities, the permittee may certify continuous compliance if there were no observed, documented, or known instances of noncompliance during the reporting period. [WAC 173-401-530(2)(d), 09/16/02]
- 2.9.4.3** All compliance certifications shall include certification by a responsible official in accordance with Condition 2.9.6.

**2.9.4.4** For the purpose of submitting compliance certifications, or establishing whether or not a person has violated or is in violation of any requirement of this permit, nothing in 40 CFR Part 60 or in the Washington State Implementation Plan shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test had been performed.  
[40 CFR 52.33(a), 2/24/97], [40 CFR 60.11(g), 10/17/00], [40 CFR 60.12(e), 2/24/97].

**2.9.5 Emission Inventory** The permittee shall submit an inventory of actual emissions from the source for each calendar year. The inventory shall include stack and fugitive emissions of TSP, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>x</sub>, CO, NO<sub>x</sub>, VOC, ammonia, lead and total TAPs, and shall be submitted no later than one hundred five days after the end of the calendar year.

- (a) Mass emissions of VOC from TMP process vents shall be reported using the mass emission rates measured during the most recent credible and representative source test for each vent, adjusted for any difference between the TMP production rate measured during the test and the annual average TMP production rate during the reporting period. Test results measure “as carbon” shall be reported “as propane” by multiplying “as carbon” values by 1.22.
- (b) Mass emissions of VOC from paper machine dryer hood exhausts shall be reported using the most recent credible and representative source test data for the dryer hood exhausts, adjusted for any difference between the paper machine production rate measured during the test and the annual average paper machine production rate during the reporting period. Mass emissions of VOC from other paper machine emission points shall be reported using the emission factor for “Total Emission – Wet End” from NCASI Technical Bulletin TB740, times the annual average paper machine production rate during the reporting period. VOC data expressed “as carbon” shall be reported “as propane” by multiplying “as carbon” values by 1.22.
- (c) 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.
- (d) Together with the annual emission inventory the permittee shall submit an annual report that includes total propane usage for the mill, broken down by emission unit, annual average paper production (machine dried metric tons/day) and annual average TMP production (oven dried metric tons/day). [WAC 173-400-105(1), 8/20/93], [Order No 00AQER-1819, 3<sup>rd</sup> Amendment, issued 03/01/2010, Approval conditions 5.1.1, 5.1.2, 6.2, 6.2.1, 6.2.2, 6.2.3 and 6.4]

**2.9.6 Submittals** Reports, test data, monitoring data, notifications, certifications, and applications (including requests for renewal) shall be submitted to Ecology at the address included in this permit. Any application form, report or compliance certification submitted to Ecology pursuant to this permit shall contain certification of truth, accuracy, and completeness by a responsible official. Where the permit requires reporting more frequently than once every six months the responsible official’s certification need only be submitted together with the semi-annual monitoring report required by Condition 2.9.2. The certification must cover all required reporting since the date of the last certification. All certifications shall state that *“based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and*

*complete*". The permittee shall promptly, upon discovery, report to Ecology any material error or omission in these records, reports, plans or other documents.

[WAC 173-401-520, 09/16/02], [WAC 173-401-500(6), 09/16/02], [40 CFR 60.4(a), (b), 07/01/02]

## 2.10 Excess emissions

**2.10.1 Excess emissions due to emergency:** An emergency<sup>2</sup>, as defined in WAC 173-401-645(1), constitutes an affirmative defense to an action brought for non-compliance with a technology-based<sup>3</sup> emission limitation if the permittee demonstrates through properly signed, contemporaneous operating logs or other relevant evidence that:

- (a) An emergency occurred and that the permittee can identify the cause(s) of the emergency
- (b) The permitted facility was at the time being properly operated;
- (c) During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit;
- (d) The permittee submitted notice of the emergency to Ecology within **two (2) working days** of the time when emission limitations were exceeded due to the emergency, or shorter periods of time specified in an applicable requirement. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (e) In any enforcement action, the permittee seeking to establish the occurrence of an emergency has the burden of proof. [WAC 173-401-645, 9/16/02]

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

**2.10.2.1** The permittee shall have the burden of proving to Ecology that excess emissions were unavoidable. This demonstration shall be a condition to obtaining relief under 2.10.2.2, 2.10.2.3 or 2.10.2.4.

**2.10.2.2** Excess emissions due to startup or shutdown conditions shall be considered unavoidable provided the source reports as required under Condition 2.9.1 and adequately demonstrates that the excess emissions could not have been prevented through careful planning and design and if a bypass of control equipment occurs, that such bypass is necessary to prevent loss of life, personal injury, or severe property damage.

**2.10.2.3** Excess emissions due to scheduled maintenance shall be considered unavoidable if the source reports as required under Condition 2.9.1 and adequately demonstrates that the excess emissions could not have been avoided through reasonable design, better scheduling for maintenance or through better operation and maintenance practices.

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

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<sup>2</sup> An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, which requires immediate corrective action to restore normal operation. An emergency does not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

<sup>3</sup> Technology-based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes.

- 2.10.2.4.1** The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance, and
- 2.10.2.4.2** The operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded. [WAC 173-400-107(3), 8/20/93, 9/6/07 (S)], [WAC 173-400-107, 8/20/93, 9/6/07 (S)]

## **2.11 Federal Chlorofluorocarbons (CFC) Requirements – Title VI of the FCAA 1.24.1**

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

**2.11.4** The permittee shall be allowed to switch from any ozone depleting substance to any alternative that is listed in the Significant New Alternative Program promulgated pursuant to 40 CFR 82, Subpart G – Significant New Alternative Policy Program.[40 CFR 82, 07/01/02], [RCW 70.94.970, 1/4/01 (S)], [RCW 70.94.980, 1/4/01 (S)]

**2.12 Circumvention to conceal violation of an NSPS Standard:** The permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere.  
[40 CFR 60.12, 3/8/74]

### **2.13 Insignificant Emission Units**

Upon request from the permitting authority the permittee must provide documentation sufficient to enable the authority to determine that the emission unit or activity has been appropriately listed as insignificant.

An activity or emissions unit that qualifies as insignificant solely on the basis of WAC 173-401-530 (1)(a) shall not exceed the emissions thresholds specified in WAC 173-401-530(4) until the permit is modified pursuant to WAC 173-401-725 (Permit modifications)

Testing, monitoring, recordkeeping and reporting are not required for insignificant emissions units and activities unless determined by the permitting authority to be necessary to assure compliance or unless it is otherwise required by a generally applicable requirement of the state implementation plan.

Upon request from the permitting authority, at any time during the term of the permit, an applicant who lists an activity or emissions unit as insignificant under WAC 173-401-530 (1)(a) shall demonstrate to the permitting authority that the actual emissions of the unit or activity are below the emission thresholds. [WAC 173-401-530(2), (4), (5),(6), 09/16/02]

## **3. PERMIT CHANGES**

### **3.1 Changes not requiring permit revisions**

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

**3.1.1.1** The proposed changes are not Title I (FCAA) modifications;

**3.1.1.2** The proposed changes do not result in emissions which exceed those allowable under the permit, whether expressed as a rate of emissions, or in total emissions;

**3.1.1.3** The proposed changes do not alter permit terms that are necessary to enforce limitation on emissions from units covered by the permit;

**3.1.1.4** The facility provides Ecology and EPA with written notification at least 7 days prior to making the proposed changes except that written notification of a change made in response to an emergency shall be provided as soon as possible after the event;

**3.1.1.4.1** The written notification shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in

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

**3.1.2** *Changes related to Emissions trading under an emissions cap.* Pursuant to Condition 3.1.1, the permittee is authorized to trade increases and decreases in emission in the permitted facility, where the Washington state implementation plan provides for such emissions trades without requiring a permit revision. This provision is available in those cases where the permit does not already provide for such emissions trading. Such changes shall be subject to the following:

- 3.1.2.1** The written notification required under Condition 3.1.1.4 shall include such information as may be required by the provision in the Washington SIP authorizing the emissions trade, including at a minimum, when the proposed change will occur, a description of each such change, any change in emissions, the permit requirements with which the source will comply using the emissions trading provisions of the Washington SIP, and the pollutants emitted subject to the emissions trade. The notice shall also refer to the provisions with which the source will comply in the applicable implementation plan and that provide for the emissions trade. The notification shall state how any increases or decreases in emissions will comply with the terms and conditions of the permit. (The permit shield described under Condition 1.1 shall extend to terms and conditions that allow such increases and decreases.)
- 3.1.2.2** The permit shield described in Condition 1.1 shall not extend to any change made under this paragraph. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the applicable implementation plan authorizing the emissions trade.
- 3.1.2.3** Upon the request of the permit applicant, Ecology shall issue permits that contain terms and conditions, including all terms required under WAC 173-401-600 through 173-401-630 to determine compliance, allowing for the trading of emissions increases and decreases in the chapter 173-401 WAC source solely for the purpose of complying with a federally enforceable emissions cap that is established in the permit independent of otherwise applicable requirements. The permit applicant shall include in its application proposed replicable procedures and permit terms that ensure the emissions trades are quantifiable and enforceable. The emissions trading provision shall not be applied to any emissions units for which emission are not quantifiable or for which there are no replicable procedures to enforce the emissions trades. The permit shall also require compliance with all applicable requirements.
- 3.1.2.4** A source making a change under this section shall comply with applicable preconstruction review requirements established pursuant to Condition 4.1.
- 3.1.2.5** No permit revision shall be required, under any approved economic incentives, marketable permits, and other similar programs or processes for changes that are provided for in this permit such as emissions trading. [WAC 173-401-722, 09/16/02], [WAC 173-401-620(2)(g), 09/16/02]

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

- 3.2.1** The proposed changes shall not weaken the enforceability of any existing permit conditions.
- 3.2.2** Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition.

- 3.2.3** Before or contemporaneously with making the permit change, the permittee must provide written notice to Ecology and EPA Region 10 at the respective addresses included in this permit. Such written notice shall describe each such change, including the date, any change in emissions or pollutants emitted and any applicable requirements that would apply as a result of the change.
- 3.2.4** The change shall not qualify for the permit shield under Condition 1.1.
- 3.2.5** The permittee shall record all changes that result in emissions of any regulated air pollutant subject to any applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes. The record shall reside at the permitted facility.
- 3.2.6** A source making a change under this section shall comply with the preconstruction review requirements established pursuant to Conditions 4.1 and 4.2.

### **3.3 Reopening for Cause**

- 3.3.1** Ecology will reopen and revise this permit as necessary to remedy deficiencies in the following circumstances:
  - 3.3.1.1** Additional requirements under the FCAA become applicable to a major source three (3) or more years prior to the expiration date of this permit. Such a reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j).
  - 3.3.1.2** Ecology or the Administrator determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
  - 3.3.1.3** Ecology or the Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- 3.3.2** Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
- 3.3.3** Reopening shall not be initiated before a notice of intent to reopen is provided to the permittee by Ecology at least thirty (30) days in advance of the date that this permit is to be reopened, except that Ecology may provide a shorter time period in the case of an emergency.
- 3.3.4** All permit conditions remain in effect until such time as Ecology takes final action.[WAC 173-401-730, 09/16/02]

### **3.4 Administrative Permit Amendments**

- 3.4.1** An administrative permit amendment is a permit revision that:
  - 3.4.1.1** Allows for a change in ownership or operational control of this source where the permitting authority has determined that no other change in this permit is necessary and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to Ecology,
  - 3.4.1.2** Corrects typographical errors within the permit,
  - 3.4.1.3** Identifies a change in the name, address, or phone number of any person identified in the permit, or provides for a similar minor administrative change at the source,
  - 3.4.1.4** Requires more frequent monitoring or reporting by the permittee, or

- 3.4.1.5** Incorporates into the permit the terms, conditions, and provisions from orders approving notice of construction applications processed under an EPA-approved program, provide that such a program meets procedural requirements substantially equivalent to the requirements of WAC 173-401-700, 173-401-725, and 173-401-800 that would be applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in WAC 173-401-600 through 173-401-650.
- 3.4.2** The source may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.
- 3.4.3** 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]

#### **4. APPLICABLE WHEN TRIGGERED REQUIREMENTS**

The following requirements apply if the permittee takes certain actions or proposes changes that trigger applicability. No monitoring is specified for these requirements, but the Compliance Certification specified in section 2.10.3 must include a description of the permittee's compliance status.

- 4.1 New Source Review:** The permittee shall not construct new sources or make modifications required to be reviewed under WAC 173-400-110, WAC 173-400-113, WAC 173-400-141, or WAC 173-460 before the permittee obtains written final approval from Ecology in accordance with those regulations, pays the appropriate fees required by WAC 173-455-120, and pays the cost of public notice described in WAC 173-400-171.

[WAC 173-400-110, 8/20/93, 9/6/07 (S)], [WAC 173-400-113, 8/20/93, 9/6/07 (S)], [WAC 173-455-120, 9/6/07 (S)], [WAC 173-400-141, 9/6/07 (S)], [WAC 173-400-171, 8/20/93, 9/6/07 (S)], [WAC 173-460, 7/21/98 (S)], [RCW 70.94.152, 1/4/01 (S)], [Order No. 00AQER-1819, 3<sup>rd</sup> Amendment Issued 03/01/2010, Approval Condition 8.5]

- 4.2 NSPS Notification of Physical or Operational Change:** In the event of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, the permittee shall provide notice as required. This notice shall be postmarked sixty (60) days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. Ecology may request additional relevant information subsequent to this notice. These requirements are in addition to any pre-construction review requirements as outlined under Standard Condition 4.1.

[40 CFR 60.7(a)(4) 2/12/99], [Order No. 00AQER-1819, 3<sup>rd</sup> Amendment Issued 03/01/2010, Condition 8.5]

- 4.3 Replacement or Substantial Alteration of Emission Control Technology:** Prior to replacing or substantially altering emission control technology subject to review under WAC 173-400-114, the permittee shall file for and obtain approval from Ecology according to that regulation. The permittee shall pay the appropriate fees required by WAC 173-455-100(4) prior to commencing construction.

[WAC 173-455-100(4), 5/30/07 (S)], [WAC 173-400-114, 9/6/07 (S)], [RCW 70.94.153, 1/4/01 (S)]

- 4.4 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), 9/6/07 (S)]

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

**4.5.1 Notification:** The permittee shall provide at least 30 days notice prior to any performance test. The notice shall include a source test plan for approval. If Ecology does not provide comments on the plan within three weeks, the plan shall be considered acceptable. If there is a delay in conducting a scheduled performance test, the permittee shall notify Ecology as soon as possible. The notification shall include at least:

**4.5.1.1** A test schedule;

**4.5.1.2** Proposed test methods, including any request to deviate from a required test method;

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

**4.5.1.4** Any adjustments that will be made prior to the stack test, such as tuning burners or changing bags in a baghouse. Normally scheduled periodic maintenance need not be included.

**4.5.2 Source Test Methods:** Source testing shall be conducted using EPA methods from 40 CFR Parts 51, 60, 61 and 63 (in effect on October 1, 2006) or procedures in Ecology Source Test Manual September 20, 2004 (available online at [http://www.ecy.wa.gov/programs/air/Source\\_Test/sourcetesthome.html](http://www.ecy.wa.gov/programs/air/Source_Test/sourcetesthome.html)). Use of any other test methods must be requested per 4.5.1.2, and approved in advance

**4.5.3 Test reports.** The permittee shall submit source test reports to Ecology within 60 days of test completion. Test reports shall include:

**4.5.3.1** The date and time of the test.

**4.5.3.2** A description of the source, associated pollution control equipment and sampling locations.

**4.5.3.3** A description of the test methods and quality assurance procedures used.

**4.5.3.4** A summary of results in the same units and averaging periods as the applicable emission standard.

**4.5.3.5** Field data and sample calculations.

**4.5.3.6** Operating conditions such as the amount of fuel burned, steam generated, raw materials processed and product produced during the test

**4.5.3.7** Source and control equipment operating parameters measured during the test.

[WAC 173-401-630(1), 9/16/02], [Order No 00AQER-1819, 3rd Amendment, issued 03/01/2010, Approval Condition 6.1].

**4.6 NSPS Source testing requirements:** The permittee shall conduct performance tests when required by terms of this permit and at other times as the EPA or Ecology may require.

**4.6.1 Test methods and procedures.** Performance tests shall be conducted and data reduced in accordance with the specified test method, unless alternative methods are approved in advance.

**4.6.2 Test Conditions.** Testing shall be performed under conditions specified by Ecology based on representative performance of the affected facility. The permittee shall make available to Ecology records necessary to determine the conditions of the performance test. Operations during periods of startup, shutdown and malfunction shall not constitute representative conditions for the purpose of

performance testing. Emissions in excess of the emission limit during periods of startup, shutdown and malfunction shall not be considered a violation of the emission limit unless otherwise specified in the applicable standard.

**4.6.3** Continuous Monitoring Systems and Monitoring Devices: All continuous monitoring systems and monitoring devices shall be installed such that representative measurements of emissions or process parameters are obtained, and operational prior to conducting performance testing. Verification of operational status shall, as a minimum, include completion of the manufacturer's written requirements or recommendations for installation, operation, and calibration of the device.

**4.6.4** Testing facilities: The permittee shall provide the following performance testing facilities:

**4.6.4.1** Sampling ports adequate for test methods. This includes (i) constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and procedures and (ii) providing a stack or duct free of cyclonic flow during performance tests, as demonstrated by applicable test methods and procedures.

**4.6.4.2** Safe sampling platforms and access to platforms.

**4.6.4.3** Utilities for sampling and testing equipment.

**4.6.5** Test duration and sampling runs: Unless otherwise specified, a performance test shall consist of three separate runs of 60 minutes each using the reference test method specified in the permit condition. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the three runs shall apply.

**4.6.6** Lost samples or discontinued test runs: If a sample is accidentally lost or one of the three runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the permittee's control, compliance may, upon Ecology approval, be determined using the arithmetic mean of the results of the two other runs.

[40 CFR 60.8 (b), (c), (e), (f); 40CFR 60.13(b), Order No 00AQER-1819, 3<sup>rd</sup> Amendment, issued 03/01/2010, Approval condition 4.2.3.4]

**4.7 MACT Construction or Reconstruction:** If the permittee constructs a new bleaching system or reconstructs the existing bleaching system the information in 40 CFR 63.9(b)(5)(i) and (ii) must be provided to the Administrator.

[40 CFR 63.455(a), 40 CFR 63.9(b)(5)].

## 5. EMISSION LIMITATIONS AND WORK PRACTICE REQUIREMENTS

Pursuant to Washington Administrative Code (WAC) 173-401 the permittee is authorized to operate the processes described in Sections 5.1 through 5.6 until this permit expires, is modified or revoked. These processes are subject to the conditions included in Sections 5.1 through 5.6; to the Monitoring, Recordkeeping, and Reporting Requirements in Section 6, and to other terms and conditions specified in this permit<sup>4</sup>.

The column entitled **Description** in each table contains abbreviated and/or paraphrased versions of the applicable conditions, emission limitations or work practices. The cited condition, emission standard or work practice is the enforceable requirement. Any perceived discrepancies between the description and an underlying applicable requirement will be resolved by reference to the cited applicable requirement.

### Testing Requirements

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

[WAC 173-401-615(1)(a), 09/16/02], [WAC 173-401-630(1), 09/16/02], [WAC 173-400-105(4), 8/20/93, 9/6/07(S)]

### Streamlining

An asterisk following a condition number indicates that streamlining of a less stringent requirement has taken place and is described in section 15 of the Statement of Basis.

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<sup>4</sup> The monitoring, recordkeeping and reporting requirements in Section 6 do not apply to insignificant emissions units or activities.

### 5.1 Facility-Wide

This section is applicable to all emission sources at the facility, including emission units in Sections 5.2 through 5.5. Facility-wide requirements apply to insignificant emission units or activities—but testing, monitoring, recordkeeping and reporting are not required (see Standard Condition 2.13). The permittee is required to certify compliance for insignificant emission units or activities per Standard Condition 2.9.4.

| Condition Number | Condition, Emission Standard, or Work Practice    | Enforceability (Federal = F) (State = S) | Description  | Testing | MRRR Reference |
|------------------|---|--|--|---------|----------------|
| 5.1.1            | WAC 173-400-040 (1), (1)(a), and (1)(b) (8/20/93) | F  | Visible emissions from all emission units shall not exceed 20% opacity for more than 3 minutes in any one hour   | RM 9A   | 5M             |
| 5.1.2            | WAC 173-400-040(6)(1 <sup>st</sup> ¶)(8/20/93)    | F  | SO <sub>2</sub> emissions shall not exceed 1,000 ppm (60 minute average) on a dry basis (corrected to 7% O <sub>2</sub> for combustion sources).                           | 6, 6C   | 17M            |
| 5.1.3            | WAC 173-400-040(2) (9/6/07)                       | 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              | None    | 1M             |
| 5.1.4            | WAC 173-400-040(3)(a), /20/93                     | F  | The source shall perform maintenance to minimize emissions and take reasonable precautions to prevent the release of air contaminants.                                     | None    | 1M, 3M         |
| 5.1.5            | WAC 173-400-040 (8)(a) (9/6/07)                   | F  | Take reasonable precautions to prevent fugitive dust. Maintain & operate to minimize emissions.  | None    | 3M             |
| 5.1.6            | WAC 173-400-040(4) 09/6/07                        | S  | Any producer of an odor which may unreasonably interfere with any other property owner's use and enjoyment of his property must reduce these odors to a reasonable minimum | None    | 1M             |

|        |   |                 |  |      |             |
|--------|---|-----------------|--|------|-------------|
| 5.1.7  | WAC 173-400-040(5)<br>(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 | None | <b>1M</b>   |
| 5.1.8  | WAC 173-400-040(7)<br>8/20/93   | F               | No person shall conceal or mask an emission of an air contaminant  | None | <b>none</b> |
| 5.1.9  | WAC 173-400-200(2)<br>8/20/93   | F               | No source may use dispersion techniques or excess stack height to meet ambient air quality standards or PSD increment limitations  | None | <b>none</b> |
| 5.1.10 | WAC 173-400-205<br>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                   | None | <b>none</b> |
| 5.1.11 | RCW 70.94.040<br>1/4/01   | S               | Causing air pollution in violation of Chapter 70.94 RCW is unlawful  | None | <b>none</b> |
| 5.1.12 | Order No. 00AQER-1819, 3 <sup>rd</sup> Amendment, Issued 03/01/2010, Approval Condition 8.4]<br>WAC 173-425<br>Restriction on Open Burning, 3/13/00 | F<br>-----<br>F | No outdoor burning, except as allowed by WAC 173-425.  | None | <b>none</b> |
| 5.1.13 | WAC 173-400-040 (1 <sup>st</sup> ¶)8/20/93  | F               | All emissions units are required to use RACT   | None | <b>none</b> |

|        |  |   |  |      |      |
|--------|--|---|--|------|------|
| 5.1.14 | Order No 00AQER-1819, 3rd Amendment, issued 03/01/2010, Approval Condition 8.2 | F | Legible copies of the NOC Order shall be available at the facility for review upon request by Ecology. | none | none |
|--------|--|---|--|------|------|

5.2 Nebraska Boiler

| Condition Number | Condition, Emission Standard, or Work Practice  | Enforceability (Federal = F) (State = S) | Description   | Testing | MRRR Reference |
|------------------|---|--|---|---------|----------------|
| 5.2.1            | Order No 00AQER-1819, 3rd Amendment, issued 03/01/2010, Approval condition 3.1.1  | F  | Visible emissions from the stack shall not exceed 10% average of 6 minutes  | RM 9    | 5M             |
| 5.2.2            | Order No 00AQER-1819, 3rd Amendment, issued 03/01/2010, Approval condition 3.1.2.1  | F  | NO <sub>x</sub> ≤0.05lb/MM BTU heat input, 30-day rolling average at all times when main burner in operation  | 7/7E    | 6M             |
| 5.2.3            | Order No 00AQER-1819, 3rd Amendment, issued 03/01/2010, Approval condition 3.1.2.2<br>40 CFR 60.44b(a)(1), 40 CFR 60.44b(i), 40 CFR 60.44b(h) | F  | NO <sub>x</sub> ≤0.20 lb/MM BTU heat input, 30-day rolling average. The limit applies at all times.   | 7/7E    | 6M             |
| 5.2.4            | Order No 00AQER-1819, 3rd Amendment, issued 03/01/2010, Approval condition 2.1  | F  | Propane use ≤6,000,000 gallons on a 12 month rolling basis.   |         | 4M             |
| 5.2.5            | Order No 00AQER-1819, 3rd Amendment, issued 03/01/2010, Approval condition 7, 8.3   | F  | A site-specific O&M manual covering the operation & maintenance of the Nebraska and Fluidized Bed boilers and the coordinated operation of both boilers shall be developed, followed, available for review and updated to reflect any physical or operational modifications to either of the boilers. Emissions that result from failure to follow the requirements of the O&M manual may be considered proof that the boiler was not properly operated, maintained and tested The O&M manual shall include normal operating parameters, maintenance schedules, monitoring & recordkeeping requirements, a description of monitoring procedures and |         | 2M             |

|       |                                   |   |   |     |     |
|-------|-----------------------------------|---|---|-----|-----|
|       |                                   |   | actions for abnormal control system operation..   |     |     |
| 5.2.6 | 40 CFR 60.11(d)                   | F | At all times, including SSM periods, operation of the Nebraska boiler shall be conducted, to the extent practicable, in a manner consistent with good air pollution control practice for minimizing emissions |     | 2M  |
| 5.2.7 | WAC 173-400-050(1), (3) (2/19/91) | F | Particulate matter emissions from combustion and incineration units shall not exceed 0.1 gr/dscf, corrected to 7% oxygen.   | RM5 | 17M |

**5.3 Fluidized Bed Boiler**

| Condition Number | Condition, Emission Standard, or Work Practice  | Enforceability (Federal = F) (State = S) | Description   | Testing                     | MRRR Reference |
|------------------|---|--|---|-----------------------------|----------------|
| 5.3.1*           | Order No 00AQER-1819, 3 <sup>rd</sup> Amendment, issued 03/01/2010, Approval Condition 4.1.7  | F  | Stack opacity shall not exceed 10%, six-minute period, as measured by COMS.   | COMS                        | 7M             |
| 5.3.2            | Order No 00AQER-1819, 3 <sup>rd</sup> Amendment, issued 03/01/2010, Approval Condition 4.1.8<br>-----<br>40 CFR 60.43c(c)                             | F<br><br>F                               | Stack opacity shall not exceed 20% (6-minute average) except one 6-minute period per hour of not more than 27%. The limit shall not apply during startup, shutdown and malfunction. | COMS                        | 7M,            |
| 5.3.3*           | Order No 00AQER-1819, 3 <sup>rd</sup> Amendment, issued 03/01/2010, Approval Condition 4.1.1<br>-----<br>40 CFR 60.43c(b)(1)<br>-----<br>WAC 173-400- | F<br><br>F<br><br>F                      | PM-10 (filterable + condensable) shall not exceed the more restrictive of 0.02 grains/dscf @ 3% O <sub>2</sub> or 0.043 lb/MM Btu heat input, as measured at the exhaust stack.     | RM5 or RM17, RM19 and RM202 | 9M             |

|        |  |                     |  |              |         |
|--------|--|---------------------|--|--------------|---------|
|        | 050(1),(3) (2/19/91)   |                     |  |              |         |
| 5.3.4  | Order No 00AQER-1819, 3 <sup>rd</sup> Amendment, issued 03/01/2010, Approval Condition 4.2.5.<br>-----<br>40 CFR 60.48c(g) | F<br><br>-----<br>F | The quantity and type of each fuel shall be determined and recorded each boiler operating day. The methodology for determining fuel feed rates shall be part of the FBB O & M Manual.  | None         | 2M      |
| 5.3.5  | Order No 00AQER-1819, 3rd Amendment, issued 03/01/2010, Approval Condition 4.1.2   | F                   | SO <sub>2</sub> emissions not >36.84 lb per 3-hour block average.  | RM 6C        | 8M, 9M, |
| 5.3.6  | Order No 00AQER-1819, 3rd Amendment, issued 03/01/2010, Approval Condition 4.1.3   | F                   | NO <sub>x</sub> emissions not >0.30 lb/MM Btu heat input, 24-hour block average.   | RM 7 or 7E   | 9M, 10M |
| 5.3.7  | Order No 00AQER-1819, 3rd Amendment, issued 03/01/2010, Approval Condition 4.1.4   | F                   | CO emissions not >0.25 lb/MM Btu heat input, 1-hour average.   | RM10         | 9M      |
| 5.3.8  | Order No 00AQER-1819, 3rd Amendment, issued 03/01/2010, Approval Condition 4.1.5   | F                   | VOC emissions not >0.044 lb/MM Btu heat input, 1-hour average.   | RM 25A       | None    |
| 5.3.9  | Order No 00AQER-1819, 3rd Amendment, issued 03/01/2010, Approval Condition 4.1.6.  | F                   | Ammonia emissions not > 35 ppmdv, 1-hour average.  | BAAQMD ST-1B | 9M, 11M |
| 5.3.10 | Order No 00AQER-1819, 3rd Amendment, issued 03/01/2010, Approval condition 7   | F                   | A site-specific O&M manual covering the operation & maintenance of the Nebraska and Fluidized Bed boilers and the coordinated operation of both boilers shall be developed, followed, available for review and updated to reflect any physical or operational modifications to either of the boilers. Emissions that result from failure to follow the requirements of the O&M manual may be considered proof that the boiler was not properly operated, | None         | 2M      |

|         |                           |   |  |                |     |
|---------|---------------------------|---|--|----------------|-----|
|         |                           |   | maintained and tested<br>The O&M manual shall include normal operating parameters, maintenance schedules, monitoring & recordkeeping requirements, a description of monitoring procedures and actions for abnormal control system operation. |                |     |
| 5.3. 11 | 40 CFR 60.11(d)           | F | At all times, including SSM periods, operation of the FBB shall be conducted, to the extent practicable, in a manner consistent with good air pollution control practice for minimizing emissions  | None           | 2M, |
| 5.3.12  | 40 CFR 61.52(b), 60.12(e) | F | Mercury emissions from the FBB stack shall not exceed 3.2 kg (7.1 lb) per 24-hour period.  | RM101 or RM105 | 12M |

#### 5.4 TMP Mill

| Condition Number | Condition, Emission Standard, or Work Practice  | Enforceability (Federal = F) (State = S) | Description   | Testing | MRRR Reference |
|------------------|---|--|---|---------|----------------|
| 5.4.1            | Order No 00AQER-1819, 3rd Amendment, issued 03/01/2010, Approval conditions 2.3, and 2.3.1. | F  | TMP mill pulp production $\leq$ 598 oven-dried metric tons <sup>5</sup> , (calculated at zero % moisture) pulp per day on an annual average basis.<br><br>Production estimated as final paper production less recycled fiber, purchased fiber and filler, calculated from production records. |         | 13M            |
| 5.4.2            | Order No 00AQER-1819, 3rd Amendment, issued 03/01/2010, Approval condition 5.1.3.3          |  | Conduct VOC source testing of TMP process vents at least once every five calendar years, running from the August 2006 test date, and when required by a new source review approval order. Changes to TMP exhaust ducting, use of new chemicals to bleach or digest pulp, unprecedented high   |         | 14M            |

<sup>5</sup> 1 metric ton (a.k.a. tonne) = 2,204.6 pounds/1.10 ton

|       |   |                 |  |     |     |
|-------|---|-----------------|--|-----|-----|
|       |   |                 | SO2 application rates or increases in pulping capacity may require source testing.   |     |     |
| 5.4.3 | 40 CFR 68.36  | F               | Every five years the permittee shall review and update the off-site consequence analyses in its Risk Management Plan (RMP) for Sulfur Dioxide, Anhydrous. If changes in processes, quantities stored or handled or any other aspect of the facility might reasonably be expected to increase or decrease the distance to the endpoint by a factor of two or more, the permittee shall complete a revised analysis within six months of the change and submit a revised risk management plan as provided in 40 CFR 68.190 |     | 18M |
| 5.4.4 | WAC 173-400-060 (8/20/93)<br>-----<br>WAC 173-400-060 (2/10/05) | F<br>-----<br>S | General process units are required to meet all applicable provisions of WAC 173-400-040 and emissions of particulate matter from any general process unit shall not exceed 0.1 grain/dscf  | RM5 | 3M  |

5.5 Paper Machine Dryer Section

| Condition Number | Condition, Emission Standard, or Work Practice                                     | Enforceability (Federal = F) (State = S) | Description  | Testing | MRRR Reference |
|------------------|--|--|--|---------|----------------|
| 5.5.1            | Order No 00AQER-1819, 3rd Amendment, issued 03/01/2010, Approval condition 2.2.    | F  | Plant newsprint paper production is limited to 747 machine-dried metric tons annual average basis per day. Paper machine production shall be estimated as the weight of product shipped, including any reject material shipped as lower grade product.                 |         | 15M            |
| 5.5.2            | Order No 00AQER-1819, 3rd Amendment, issued 03/01/2010, Approval condition 5.1.3.3 |  | Conduct VOC source testing of paper machine dryer hoods at least once every five calendar years, running from the August 2006 test date, and when required by a new source review approval order. Changes to Paper machine exhaust ducting may require source testing. |         | 16M            |
| 5.5.3            | WAC 173-400-060 (8/20/93)<br>-----<br>WAC 173-400-060 (2/10/05)                    | F<br><br>-----<br>S                      | General process units are required to meet all applicab12/12/2008 5:31 PMle provisions of WAC 173-400-040 and emissions of particulate matter from any general process unit shall not exceed 0.1 grain/dscf  | RM5     | 3M             |

5.6 Paper Machine Wet End

| Condition Number | Condition, Emission Standard, or Work Practice                  | Enforceability (Federal = F) (State = S) | Description   | Testing | MRRR Reference |
|------------------|---|--|---|---------|----------------|
| 5.6.1            | WAC 173-400-060 (8/20/93)<br>-----<br>WAC 173-400-060 (2/10/05) | F<br>-----<br>S                          | General process units are required to meet all applicable provisions of WAC 173-400-040 and emissions of particulate matter from any general process unit shall not exceed 0.1 grain/dscf | RM5     | 3M             |

5.7 Bleaching System

| Condition Number | Condition, Emission Standard, or Work Practice | Enforceability (Federal = F) (State = S) | Description  | Testing | MRRR Reference |
|------------------|--|--|--|---------|----------------|
| 5.7.1            | 40 CFR 63.6 (e)(1)(i)                          | F  | Operate and maintain the affected source in a manner consistent with safety and good air pollution control practices for minimizing emissions. | none    | none           |

## 6 MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS

**1M.** The permittee shall maintain records of all complaints received. Ecology shall be notified within 3 working days of receipt of any complaints. The permittee shall address and respond to all complaints within 3 working days of receipt of the complaint. The recordkeeping shall include the following with regard to the complaint:

- a) A record of the time, date and nature of all written complaints, complaints received by telephone or complaints received in person,
- b) Findings from the permittee's investigation of the complaint, including an estimate of excess emissions, if any, and the cause and duration of any deviation identified by the investigation
- c) Corrective action taken, if needed, and the results of such action. [WAC 173-401-615(1),(2), 09/16/02] NOTE: this MRRR includes gap-filling

**2M** At least annually, the permittee shall conduct a facility inspection to verify that equipment is operated and maintained in accordance with the requirements of applicable O & M manuals. In the event that any non-conformance is discovered by an inspection, the permittee shall as soon as possible, but not later than 24 hours after discovery, begin corrective action, shut the operation down until the problem can be corrected, or report the violation as a deviation under Condition 2.11.

The permittee shall maintain records that include the date and results of each inspection, the date and content of any corrective action taken in response to a problem discovered during an inspection, and the date of each update to the O&M manual.

[WAC 173-401-615(1),(2), 9/16/02]

NOTE: this MRRR includes gap-filling

**3M.** The following shall apply generally, facility wide:

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

- c) Reporting: Monthly deviation reports required by Standard Condition 2.9.1 shall include a description of any visible emissions, actions taken under a)3), and any corrective action taken. [WAC 173-401-615(1),(2), 09/16/02] NOTE: this MRRR includes gap-filling

**4M.** The annual inventory report required by Standard Condition 2.9.5 shall include the following:

- a) Total facility propane usage, by emission unit,
  - b) Average annual paper production (machine dried metric tons/day),
  - c) Average annual TMP production (oven dried metric tons/day).
- [Order No. 00AQER-1819, 3<sup>rd</sup> Amendment Issued 03/01/2010, Approval Conditions 6.2, 6.2.1, 6.2.2, 6.2.3].

**5M** The permittee shall conduct monitoring in accordance with the following.

- a) At least monthly, the permittee shall observe points of visible and PM emissions from emission units and activities to which opacity and/or particulate standards apply. The survey shall also be conducted when visible emissions are observed by facility personnel and reported to personnel responsible for environmental compliance. Facility personnel in general shall be made aware of their responsibility to report visible emissions. Each survey shall be performed as follows:
  - 1) The survey shall be conducted during daylight hours from a location with a clear view of the emission point and where the sun is as close as possible to directly behind the observer. The observer's location shall be at least 15 feet but not more than ¼ mile from the source.
  - 2) The survey shall be conducted while the facility process associated with the emission point is in operation.
  - 3) The observer will be trained in the general procedures for determining the presence of visible emissions (i.e. effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, observer position relative to source and sun, and the presence of uncombined water).
  - 4) The survey shall consist of a minimum of a 15-second visual observation of each stack or emission point to identify any visible emissions other than those due to uncombined water.
  - 5) Records shall be made of each observation, including at least: the emission points observed, the name of the observer, the date and time of the observation, the emission points observed, weather conditions and the presence or absence of visible emissions.
- b) If visible emissions are observed, the permittee shall verify that the equipment from which the emissions are released is performing its normal function, that any air pollution control equipment is operating normally and that reasonable precautions are being taken to minimize fugitive emissions (if applicable).
  - 1) If visible emissions are not eliminated within 24 hours, the permittee must conduct opacity readings using EPA 9 or Ecology Method 9A (whichever is applicable) within 1 hour, unless the emission unit is not operating, or darkness or weather conditions prevent testing. Readings must be conducted by an observer with a current EPA Method 9 certification.
    - i) For RM 9, testing shall consist of opacity readings at 15-second intervals over a minimum of six consecutive minutes (24 consecutive readings).

ii) For RM9A, testing shall consist of opacity readings at 15-second intervals over a minimum of six consecutive minutes (24 consecutive readings) unless any two readings exceed the standard, in which case testing shall continue for 60 minutes or until a violation is documented.

2) If visible emissions exceed the standard, initiate corrective action as soon as possible, but no later than 72 hours from the initial observation.

Once corrective action has been taken, the permittee shall perform, or have performed, an RM9 or Method 9A test to demonstrate a return to compliance. The results of the test shall be submitted to Ecology within two working days of completion.

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 WAC 173-401-615(3).

c) The permittee shall maintain the following records for at least 5 years:

1) A list of all facility personnel trained in general observation procedures and a list of all facility personnel with current RM9 certification.

2) For each exceedance of an opacity standard:

(a) The date and time the exceedance was identified

(b) A description of the exceedance

(c) A description of corrective action taken

(d) Copies of all RM9 or Method 9A observations documenting an exceedance or the re-establishment of normal operations.

d) Reporting: Reports of all opacity exceedances shall be included in the monthly deviation report required by Standard Condition 2.9.1.

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

NOTE: this MRRR includes gap-filling

#### **6M** Nebraska Boiler testing, monitoring, recordkeeping & reporting\*

a) Testing: Initial compliance with the NOx standard in condition 5.2.3 was determined by performance testing using a continuous emission monitoring system (CEMS) for NOx emissions under 40 CFR 60.48b(b). The 30-day test was completed on September 13, 1998. No periodic performance testing is required. Upon request from Ecology, the permittee shall determine compliance with the NOx standard through the use of a 30-day performance test

b) Monitoring: NOx emissions shall be monitored using the Predictive Emissions Modeling System (PEMS) plan Approved by EPA Region 10.

Except for system breakdowns and repairs, calibration checks and zero and span adjustments, the PEMS shall be operated continuously to provide representative NOx emission rate data while the boiler is operating.

Except for system breakdowns and repairs, calibration checks and zero and span adjustments, the system shall continuously monitor and record the following operating conditions identified in the EPA-approved PEMS plan while the boiler is operating.

- Boiler air flow

- Boiler combustion air temperature
- Boiler flue gas recirculation flow
- Boiler fuel flow
- Boiler inlet air temperature
- Boiler relative humidity
- Boiler stack temperature
- Boiler excess O<sub>2</sub>

Records of monitored operating conditions shall be maintained for at least 5 years.

Data from the PEMS will be used to monitor NO<sub>x</sub> emissions and prepare excess emission reports, and may be used to certify compliance with the NO<sub>x</sub> standard<sup>6</sup>.

c) PEMS Operation:

- 1) Substitute (reconciled) data shall be utilized only during periods of single sensor failure.
- 2) The PEMS shall be maintained according to the permittee's most recent standard operating procedures for preventive maintenance, including:
  - (a) Perform a calibration check of the relative humidity sensor annually;
  - (b) Perform a calibration check of all other sensors semi-annually.
- 3) A RATA as prescribed in EPA's Example Performance Specifications shall be conducted once every four calendar quarters, with no less than two quarters between RATAs. RATA results shall be submitted to Ecology within 30 days. A RATA shall be performed within three months of:
  - (a) A change in the fundamental mathematical relationship in the PEMS model;
  - (b) A change in operating conditions (including fuel usage).
- 4) Should the permittee choose to suspend use of the PEMS, it shall be replaced with a CEMS per CFR 60.48b without interruption in NO<sub>x</sub> monitoring.

d) Recordkeeping: the permittee shall maintain records of the following monitoring data for at least 5 years in a permanent form and available for inspection :

- 1) Records of single and multiple PEMS sensor failure.
- 2) The following PEMS records shall be maintained for each boiler operating day:
  - (a) the Calendar date
  - (b) The average hourly predicted NO<sub>x</sub> emission rates (expressed as NO<sub>2</sub>) (lb/MMBtu heat input).
  - (c) The 30-day average NO<sub>x</sub> emission rate calculated at the end of each boiler operating day for the preceding 30 operating days.
  - (d) Identification of boiler operating days when calculated 30-day average NO<sub>x</sub> emission rates are in excess of the emission standard, including reasons for excess emissions and a description of corrective actions taken.

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<sup>6</sup> Data from the PEMS constitutes credible evidence per standard condition 2.9.4.4

- (e) Identification of boiler operating days for which pollutant data have not been obtained, including reasons for not obtaining the data and description of corrective actions taken.
  - (f) Identification of time when emission data have been excluded from calculation of average emission rates and the reasons for excluding the data.
  - (g) Identification of the "F" factor used for calculations, method of determination, and type of fuel combusted.
  - (h) The annual capacity factor determined on a 12-month rolling average, with a new annual capacity factor calculated at the end of each calendar month.
  - (i) Records of all monitored operating conditions identified in 6M b).
- 3) Records of propane use on a 12-month rolling total basis. Propane use shall be based on fuel flow measurements, and/or purchase and inventory records using propane supplier documents, and/or propane tank readings.
- e) Reporting: The Permittee shall submit Excess Emissions and Monitoring Systems Performance Reports quarterly per Condition 2.9.3 for Condition 5.2.3. No relaxation of reporting frequency is allowed. The report shall include the information in d) 2) (d), (e) and (f) above.

[40 CFR 60.46b(e)(1)&(4), §60.48b(g)(2), §60.49b(d), §60.49b(g)(1)-(7), §60.13(e)], [EPA Letters of September 14, 1999 and February 10, 2000 approving Ponderay PEMS as an alternative to Subpart Db NOx monitoring requirements], [Order No. 00AQER-1819, 3<sup>rd</sup> Amendment Issued 03/01/2010, Approval Conditions 2.1.1, 3.2.1, 3.2.1.1, 3.2.1.2, 3.2.1.2.1, 3.2.1.2.2, 3.2.1.2.3, 3.2.1.3, 3.2.1.3.1 through 3.2.1.3.3, 3.2.1.4, 3.2.1.4.1, 3.2.1.4.2, 3.2.1.4.3: 3.2.1.5, 3.2.1.5.1, 3.2.1.5.2: 3.2.1.6: 3.2.1.7: 3.2.2: 3.2.2.1 through 3.2.2.8:].

#### **7M: FBB Continuous Opacity Monitoring**

##### a) Monitoring

- 1) The permittee shall install, calibrate, maintain and operate a continuous monitoring system for measuring the opacity of emissions discharged to the atmosphere and record the output of the system. The COMS shall conform to the following:
  - i) The COMS must automatically, intrinsic to the opacity monitor, check the zero and upscale (span) calibration drifts at least once daily. The acceptable range of zero and upscale calibration materials shall be as defined in Performance Specification 1 in appendix B of 40 CFR Part 60. The span value of the COMS shall be between 60 and 80 percent,
  - ii) The optical surfaces, exposed to the effluent gases, must be cleaned before performing the zero and upscale drift adjustments, except for systems using automatic zero adjustments. The optical surfaces must be cleaned when the cumulative automatic zero compensation exceeds 4 percent opacity,
  - iii) At a minimum, procedures must include an automated method for producing a simulated zero opacity condition and an upscale opacity condition using a certified neutral density filter or other related technique. Procedures must provide a system check of all active analyzer internal optics with power or curvature, all active electronic circuitry including the light source and photo detector assembly, and electronic or electro-mechanical systems and hardware and or software used during normal operation,

- iv) COMS measurements shall be reduced to 6-minute averages. Six minute averages shall be calculated from 36 or more data points equally spaced over each 6-minute period. Excess emissions may be rounded to the same number of significant digits as the applicable emission limit (i.e., 1% opacity).
  - v) Except for system breakdowns, repairs, required calibration checks, and zero and span adjustments, the COMS shall be in continuous operation and shall complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one recording cycle for each successive 6-minute period,
- 2) The COMS shall be installed such that representative measurements of opacity are obtained. Procedures for location of continuous monitoring systems contained in Section 8.1(2) of Performance Specification 1 of appendix B of 40 CFR Part 60 shall be used to locate the COMS. The Quality Assurance Plan developed as part of the initial permitting of the FBB shall be followed and those procedures applied to the COMS.
  - 3) Recordkeeping: the permittee shall maintain COMS measurements and performance evaluation records, calibration checks and maintenance records. Records shall be maintained for at least 5 years.
  - 4) Reporting: The permittee shall submit deviation reports as required under Standard Condition 2.9.1 for any six-minute opacity exceeding the limits in conditions 5.3.1 or 5.3.2. The Permittee shall submit Excess Emissions and Monitoring Systems Performance Reports per condition 2.9.3 for condition 5.3.2 by the 30<sup>th</sup> day following the end of the reporting period.

[40 CFR 60.7(f); 40 CFR 60.47c(a),(b); 40 CFR 60.13(d)(1),(2); 40 CFR 60.13(e)(1); 60.13(f); 40 CFR 60.13(h)], [Order No. 00AQER-1819, 3<sup>rd</sup> Amendment Issued 03/01/2010, Conditions 4.2.2, 4.2.2.1, 4.2.2.2, 4.2.2.3, 4.2.2.3.1, 4.2.2.3.2], [WAC 173-401-630(2), 9/16/02].

8M: CAM: Monitoring, Recordkeeping and Reporting for the FBB as required by 40 CFR 64 shall be subject to the following conditions:

a) General Conditions

- 1) Applicability: The compliance assurance monitoring (CAM) requirements in 40 CFR Part 64 apply to the FBB with respect to the particulate emission limitations identified in Condition 5.3.3 and the sulfur dioxide emission limitations identified in Conditions 5.1.2 and 5.3.5.
- 2) Monitoring Operation: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring at all times that the pollutant-specific emissions unit is operating.  
Data recorded during monitoring malfunctions<sup>7</sup>, associated repairs, and required quality assurance or control activities shall not be used for CAM purposes, including data averages and calculations, or fulfilling a minimum data availability requirement.  
The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system.[40 CFR 64.7(c) 10/22/97]

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<sup>7</sup> A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

- 3) Proper maintenance: At all times, the permittee shall maintain the monitoring, including maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b) 10/22/97]
- 4) Minimum data availability: The permittee shall recover valid monitoring data for at least 90% of the time the emission unit is required to be monitored each month. [40 CFR 64.6(c)(4) 10/22/97]
- 5) Response to excursions<sup>8</sup> or exceedances<sup>9</sup>: An excursion shall occur whenever an indicator exceeds the limit in Table 8M.1. The permittee shall respond to excursions by restoring the pollutant-specific emission unit to normal operation (i.e. indicators returned to within range) as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions).

Corrective actions may include: initial inspection and evaluation, documenting that operations returned to normal without operator action, follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard

All excursions shall be included in the monthly deviation report required by standard condition 2.9.1. Any excursion in which the unit cannot be returned to within the indicator range within 24 hours of discovery shall be considered an exceedance, and identified as such in the monthly deviation report.

Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. [40 CFR 64.7(d)(2) (10/22/97)]

- 6) CAM recordkeeping:
  - i) The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan(s) required as well as any activities undertaken to implement a quality improvement plan, and any other required supporting information (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Records shall be maintained for a period of 5 years. [40 CFR 64.9(b)(1) (10/22/97)]
  - ii) 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)(2) (10/22/97)]
- 7) Semi-annual Monitoring Report: The semi-annual monitoring report required by Standard Condition 2.9.2 shall include the following:

---

<sup>8</sup> An *excursion* is any departure from an indicator range established for monitoring, consistent with any averaging period specified for averaging the results of the monitoring.

<sup>9</sup> An *exceedance* is any condition detected by monitoring that provides data in terms of an emission limitation and that indicates that emissions are greater than the limitation, consistent with any averaging period specified.

- i) Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken,
  - ii) Summary information on the number, duration, and cause (including unknown cause, if applicable) for monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks),
  - iii) A description of any actions taken during the reporting period to implement any QIP's in effect,
  - iv) Any notice required by 40 CFR 64.7(e) of the failure of CAM monitoring to indicate an excursion or exceedance during a period in which the permittee identified a failure to meet an emission limitation [40 CFR 64.9(a)(2)(i),(ii),(iii) and 64.7(e) (10/22/97)]
- b) Particulate Matter Monitoring
- 1) Baghouse pressure drop shall be continuously monitored with a digital differential pressure sensor connected to the Distributed Control System (DCS). The DCS shall calculate 120 minute block average pressure drops, which are updated every 120 minutes. The 120-minute block averages will be compared with the indicator range in Table 8M.1. Any 120-minute block average outside the indicator range generates an alarm requiring action by the boiler operator.
  - 2) Annual baghouse inspection. An internal inspection of the baghouse, including leak detection, will be conducted at least annually. Damaged bags will be documented and replaced.
- c) SO<sub>2</sub> Monitoring
- 1) SO<sub>2</sub> emission concentrations are measured continuously. Rolling one-hour SO<sub>2</sub> emission rates in pounds per hour are calculated for comparison with the indicator in Table 8M.1. Any one-hour average emission rate exceeding the indicator generates an alarm requiring action by the boiler operator. Stoichiometric calculations using stack test data show that the indicator in Table 8M.1 will be exceeded when stack gas SO<sub>2</sub> concentration exceeds 150 ppmv. Therefore, the use of the 18.42 pounds per 1-hr block average as a CAM indicator provides reasonable assurance of ongoing compliance with the limit in condition 5.1.2.

Table 8M.1

| Pollutant specific emission limit                               | Indicator   | Monitoring Method  | Monitoring Frequency   | Quality Assurance Requirements  |
|---|---|--|--|---|
| PM limits referenced in Condition 5.3.3                         | Baghouse pressure drop between 1 and 4.0 inches w.c, 120 minute block average | Digital differential pressure monitor connected to Distributed Control System (DCS). Alarm if outside indicator range. | Pressure drops monitored continually. Average pressure drop calculated every 120 minutes                           | Digital pressure drop instrument cleaned, inspected and calibrated annually per manufacturer's recommendations. |
| SO <sub>2</sub> limits referenced in Conditions 5.1.2 and 5.3.5 | SO <sub>2</sub> > 18.42 lb per 1-hour block average                           | SO <sub>2</sub> stack gas analyzer; alarm if indicator exceeded  | SO <sub>2</sub> concentration monitored continuously. Average emission rates in lb per hour are calculated hourly. | Operate, maintain and calibrate per manufacturer recommendations. Compare to stack test results.                |

[40 CFR 64.3, §64.4(d), §64.6(c)(1)-(4), §64.7(a), (b), (c), (d), (e), §64.8, §64.9(a), (b), 10/22/97].

9M: FBB Source Testing

- a) Stack emissions of PM, NO<sub>x</sub>, SO<sub>2</sub>, CO and ammonia shall be tested at least once each 12 calendar quarters. The initial test under this Air Operating Permit shall be conducted no later than the second quarter of 2011. If any stack test demonstrates noncompliance with a pollutant's emission limit, the testing frequency for that pollutant shall be once each 4 quarters until 3 consecutive tests indicating compliance, at which time the monitoring frequency returns to once each 12 quarters.
- b) Testing for NO<sub>x</sub> shall consist of three sampling runs of at least 60 minutes each.
- c) Particulate matter testing shall use the combination of 40 CFR 60, Appendix A, Method 5 or Method 17, Method 19, and 40 CFR 51, Appendix M, Method 202 to determine total PM-10 emitted. Three 3 sample runs with a duration of at least 120 minutes per run or a duration that isokinetically collects at least 1.7 dry standard cubic meters (60 dry standard cubic feet) shall be performed
- d) The permittee shall submit notice performance testing per Standard Condition 4.5.1. Report FBB source test results to Ecology as provided in Condition 4.5.3 within 60 days of the performance test. Submit with each NO<sub>x</sub> source test report the one hour average emission rates measured by the NO<sub>x</sub> analyzer during each hour of the source test, and any adjustments made to the calibration of the NO<sub>x</sub> analyzer based on the source test data
- e) Compliance with opacity standards shall be determined concurrently with all required PM stack testing.
  - 1) To determine compliance with the opacity standard, the minimum total time of COMS data collection shall be averages of all 6-minute continuous periods within the duration of the particulate matter stack test.
  - 2) Results of the COMS opacity determinations shall be submitted along with the results of the performance test.

If COMS data results are submitted for compliance during a period when Method 9 data indicates noncompliance, the Method 9 data will be used to determine compliance with the opacity standard [40 CFR 60.11(e)(5),(6), (10/17/2000)], [Order No. 00AQER-1819, 3<sup>rd</sup> Amendment Issued 03/01/2010, Conditions 4.2.1, 4.2.6, 4.2.3.4].

10M: FBB Continuous NO<sub>x</sub> Monitoring The permittee shall monitor FBB NO<sub>x</sub> emission rates using an in-stack analyzer and calculate 24-hour block average emissions on a daily basis.

- a) Monitoring. The NO<sub>x</sub> analyzer is not subject to 40 CFR Part 60, Appendix B, Performance Specification 2: *Specifications and Test Procedures for SO<sub>2</sub> and NO<sub>x</sub> Continuous Emission Monitoring Systems in Stationary Sources*, or Appendix F *Quality Assurance Requirements for Gas Continuous Emission Monitoring Systems Used for Compliance Determination*. The monitor shall be operated according to the following:
  - 1) The NO<sub>x</sub> analyzer shall be calibrated, maintained and operated according to manufacturer recommendations. The analyzer shall be calibrated using certified cylinder calibration gases at least once every quarter.

- 2) Analyzer results shall be converted from wet ppmv to lbs/MMBTU heat input using the procedures outlined in 40 CFR 60, Appendix A, Reference Method 19. This conversion shall utilize Equation 19-3 from the method and shall be based on the output from the analyzer, the existing wet O<sub>2</sub> analyzer, a fuel factor (F<sub>d</sub>) of 9580 dscf/MMBTU and an estimated stack moisture content.

Following each stack test, the permittee will calculate the difference between the mean of the stack test results and the mean of the corresponding results derived from the NO<sub>x</sub> analyzer. If the difference between the means exceeds 15% of the emission limit of 0.30 lb/MMBTU and the mean of the results derived from the NO<sub>x</sub> analyzer is less than the mean of the stack test results, the monitoring method described in a) 2) shall be modified as necessary.

- 3) Except during analyzer calibration, maintenance, breakdowns and repairs, monitoring data shall be collected and recorded at all times the FBB is in operation. Data shall be collected and recorded for a minimum of 90% of the total operating time of the FBB, determined annually.

b) Recordkeeping: The following:

- 1) Records of all performance evaluations, calibration checks, adjustments and maintenance performed on the monitor.
- 2) Records of NO<sub>x</sub> monitoring data.

c) Reporting:

- 1) Any 24-hour block averages exceeding the emission limit in condition 5.3.6 shall be reported as deviations per condition 2.9.1.
- 2) The semi-annual monitoring report required by standard condition 2.9.2 shall include:
  - (a) Total hours of NO<sub>x</sub> monitor operation during the reporting period
  - (b) Total hours of FBB operation during the operating period.

[WAC 173-401-630(1), 9/16/02]; [Order No. 00AQER-1819, 3<sup>rd</sup> Amendment Issued 03/01/2010, Condition 4.2.3, 4.2.3.1, 4.2.3.2, 4.2.3.3,].

**11M: FBB ammonia monitoring**

- a) Monitoring: the permittee shall monitor the effective maintenance of the SNCR control system by monitoring ammonia emissions and by promptly responding to and repairing malfunctions. The ammonia analyzer is not subject to 40 CFR Part 60, Appendix B Performance Specifications For Continuous Emission Monitors, or Appendix F *Quality Assurance Requirements for Gas Continuous Emission Monitoring Systems Used for Compliance Determination*.

- 1) Except during analyzer calibration, breakdown, maintenance or repairs, ammonia emission rates shall be continuously monitored and recorded at all times when the FBB is in operation.
- 2) The ammonia analyzer shall be calibrated, maintained and operated according to manufacturer recommendations. After each source test for ammonia, the permittee shall compare data from the analyzer with source test data and correct any calibration errors identified.
- 3) The permittee shall record as an excursion any 60 minute block interval during which the ammonia analyzer records an average ammonia emission rate exceeding 30 ppm. The permittee shall commence corrective action within 12 hours of detecting an excursion, and shall restore the operation of the FBB and its associated SNCR system to its normal method of operation as

quickly as possible in accordance with good air pollution control practice for minimizing emissions.

- b) Recordkeeping: For each excursion detected by the emission analyzer, the permittee shall record information on the cause of the excursion and a description of the actions taken by PNC to diagnose and repair the problem.
- c) Reporting: In the deviation reports required by Condition 2.9.1 the permittee shall report as a violation of this condition each occasion on which the permittee failed to commence corrective action within 12 hours of detecting an excursion. Ammonia analyzer data showing an exceedance of the limit in condition 5.3.9 does not constitute a violation of the emission limit provided the permittee takes timely corrective action as provided in this condition.

[WAC 173-401-615(1)(c)], [WAC 173-401-630(1)], [Order No. 00AQER-1819, 3<sup>rd</sup> Amendment Issued 03/01/2010, Condition 4.2.4, 4.2.4.1, 4.2.4.2, 4.2.4.3, 4.2.4.4].

**12M:** FBB mercury monitoring

- a) Monitoring: Before any changes in plant operation which would potentially increase mercury emissions above the level measured in the most recent sludge test, the permittee shall estimate the new emission level by calculation. Results of the calculations shall be reported to Ecology within 30 days.
- b) Testing: Required sludge sampling and testing shall be performed according to 40 CFR 61.54
- c) Recordkeeping: the permittee shall maintain records of sludge sampling, charging rate determination and other data used to determine the mercury content of sludge for 5 years in a permanent form suitable for inspection.

[40 CFR 61.54 §§(e),(g), 1/10/05]

**13M:** TMP Production: The permittee shall record annual average daily pulp produced by the TMP mill, expressed as oven dried metric tons per day, as calculated from production records.

[WAC 173-401-615(1)(b), 1/10/05]

**14M:** TMP VOC Source Testing

Source test notification, methodology, and reporting shall follow Standard Condition 4.5

Testing shall follow the test protocol developed for the August 2006 source testing. If improved test procedures are developed, the July 2006 protocol shall be revised and submitted to Ecology for approval prior to testing. Ecology will not accept the results of testing conducted prior to approval of the source test protocol.

The permittee may propose, subject to prior Ecology approval, to test TMP vents other than those tested in August 2006.

[Order No. 00AQER-1819, 3<sup>rd</sup> Amendment Issued 03/01/2010, Condition 5.1.3.1],

**15M:** Paper Machine Production: Annual average paper production rate, expressed as machine dry metric tons/day, shall be calculated from production records. The permittee shall report paper machine production as provided in Condition 2.9.5. [Order No. 00AQER-1819, 3<sup>rd</sup> Amendment Issued 03/01/2010, Condition 2.2.1].

**16M:** Paper machine source testing: Test methods for paper machine dry hood VOC testing shall be submitted for Ecology approval prior to any future source test. The permittee may propose, subject to Ecology approval, to test a different list of dryer hood vents than those tested in December 2003.

Source test notification, methodology and reporting shall follow Standard Condition 4.5 [Order No. 00AQER-1819, 3<sup>rd</sup> Amendment Issued 03/01/2010, Condition 5.1.3.2]

**17M:** The permittee shall determine the sulfur content of fuels used, except that no determination is needed for natural gas, propane (LPG) or diesel fuel with less than 2% sulfur by weight. The permittee may rely on information from fuel suppliers or generally published information on the sulfur content of other fuels. Use of any fuel with sulfur content greater than 2% by weight may require a reference method source test during the use of that fuel. This requirement does not apply to fuel used by the Fluidized Bed Boiler. [WAC 173-401-615(1)(b), 1/10/05]. NOTE: this MRRR includes gap-filling

**18M:** Chemical Accident Prevention Risk Management Plan Recordkeeping: The permittee shall maintain records of the following information:

- a) The date of each five year review of the offsite consequence analyses required by 40 CFR 68.22;
- b) Any revisions to the Risk Management Plan required by 40 CFR 68.36(b);
- c) Documentation of offsite consequence analysis scenarios as provided in 40 CFR 68.39.

[40 CFR 68.36 and 68.39], [WAC 173-401-615(1)(b), 1/10/05] NOTE: this MRRR includes gap-filling

## 7. Permit shield Conditions

**7.1 Permit Shield.** Compliance with the terms of this Title V permit shall be deemed compliance with the applicable requirements upon which that condition is based, as of the date of permit issuance. The permit shield does not apply to any insignificant emissions units or activity designated under WAC 173-401-530.

**7.2 Inapplicable or Exempt Requirements.** The requirements shown in Table 7.1, as of the date of permit issuance, have been determined not to apply to the source, or to the specific emission units or activities indicated. Commencing the date of permit issuance, the permit shield shall cover the requirements so identified. Applicability of a requirement may be triggered by a future action or emissions increase.

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

- (a) The provisions of section 303 of the FCAA (emergency orders), including the authority of the administrator under that section;
- (b) The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- (c) The applicable requirements of the acid rain program, consistent with section 408(a) of the FCAA;
- (d) The ability of EPA to obtain information from a source pursuant to section 114 of the FCAA; or
- (e) The ability of the permitting authority to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in chapter 252, Laws of 1993. [WAC 173-401-640]

**Table 7.1:** The following table includes only requirements for which inapplicability is based on a determination or comparison of size, age, emissions or other characteristic of the emission unit with the applicability criteria in the requirement. Requirements which are subject to terms of this permit, requirements which are inherently inapplicable (i.e., the source is not in the category subject to a regulation), or requirements which apply only to regulatory agencies are not included.

| Emission Unit or Activity | Requirement                 | Description  | Basis of non-applicability  |
|---------------------------|-----------------------------|--|---|
| TMP bleaching system      | 40 CFR 63.6(e)(3)(i)        | Startup, shutdown and malfunction plan.  | The startup, shutdown, and malfunction plan does not need to address any scenario that would not cause the source to exceed an applicable emission limitation in the relevant standard.<br><br>The bleaching system is not subject to any emission limitation in the relevant standard (Subpart S). |
| TMP bleaching system      | 40 CFR 63.445(b), (c) & (d) | Bleaching system control device, emission reduction and chloroform reduction.  | Bleaching systems which do not use chlorine or chlorinated compounds are exempt.  |
| Nebraska boiler, FBB      | 40 CFR 63, Subpart DDDDD    | National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters | Subpart DDDDD was vacated by the United States Court of Appeals.  |
| Fire pump                 | 40 CFR 60, Subpart IIII     | Stationary RICE NSPS   | Pump constructed in 1989  |
| Facility                  | 40 CFR 60, Subpart Kb       | NSPS for Volatile Organic Liquid Storage Vessels   | No VOL storage vessels above thresholds   |
| FBB                       | 40 CFR 60, Subpart DDDD     | CISWI units constructed before November 30, 1999   | The FBB was constructed after November 30, 1999   |
| FBB                       | 40 CFR Part 503             | Standards For The Use Or Disposal Of Sewage Sludge   | Applies only to domestic sewage   |
| FBB                       | WAC 173-434                 | Solid waste incinerator facilities   | The definition of solid waste does not include sludge from wastewater treatment   |

| Emission Unit or Activity | Requirement             | Description  | Basis of non-applicability   |
|---------------------------|-------------------------|--|--|
|                           |                         |  | plants.  |
| FBB                       | 40 CFR 60, Subpart O    | Standards of Performance for Sewage Treatment Plants   | Only applies to municipal sewage plants  |
| FBB                       | 40 CFR 60, Subpart E    | Standards of Performance for Incinerators  | Incinerator means any furnace used in the process of burning solid waste for the purpose of reducing the volume of the waste by removing combustible matter.   |
| FBB                       | 40 CFR 60, Subpart CCCC | Standards of Performance for Commercial and Industrial Solid Waste Incineration Units (CISWI) for which construction is commenced after November 30, 1999 or for which modification or reconstruction is commenced on or after June 1, 2001 (9/22/05). | <p>In the rule promulgated on December 1, 2000, Commercial or industrial waste means solid waste (as defined in this subpart) that is combusted at any commercial or industrial facility using controlled flame combustion in an enclosed, distinct operating unit: whose design does not provide for energy recovery (as defined in this subpart); or operated without energy recovery (as defined in this subpart). Since the FBB generates steam (energy recovery), Subpart CCCC is not applicable.</p> <p>On June 8, 2007, the DC Court of Appeals vacated the September 22, 2005 version of subpart CCCC, ruling that the definition of Commercial or Industrial Waste was too narrow in excluding units using energy recovery from Subpart CCCC. The EPA will write a new rule for Commercial and Industrial Solid Waste Incineration Units. <i>This permit shield does not extend to any future CISWI rules</i></p> |

| Emission Unit or Activity  | Requirement             | Description  | Basis of non-applicability  |
|--|-------------------------|--|---|
| FBB  | 40 CFR 60, Subpart EEEE | Standards of Performance for Other Solid Waste Incineration Units for Which Construction is Commenced After December 9, 2004, or for Which Modification or Reconstruction is Commenced on or After June 16, 2006 | The FBB does not meet the definition of an OSWI unit in 40 CFR 60.2977  |
| FBB  | 40 CFR 64               | Compliance Assurance Monitoring (CAM) for CO, VOC and Mercury emissions.   | The FBB does not use control devices to comply with limits on CO, VOC and mercury emissions.  |
| FBB  | 40 CFR 64               | Compliance Assurance Monitoring (CAM) for NOx  | The NOx monitor specified in the Air Operating Permit is a continuous compliance determination method. The NOx standards are exempt from CAM per 40 CFR 64.2(b)(1)(vi). |
| Chip handling, TMP, Deinking plant, Paper machine & Wastewater treatment plant | 40 CFR 64               | Compliance Assurance Monitoring (CAM)  | The emission units do not use control devices to comply with emission limits.   |
| Nebraska boiler  | 40 CFR 64               | Compliance Assurance Monitoring (CAM)  | The Nebraska boiler does not use control devices to comply with PM, SO2 or NOx emission limitations.  |
| Facility   | WAC 173-400-151         | Retrofit Requirements for Visibility Protection  | The facility is not in one of the 26 source categories in (1)(c).   |
| Facility   | WAC-173-401-650         | Operational Flexibility  | Applies only to alternative operating scenarios. The permittee did not request any alternative operating scenarios.   |

## Attachment 1 Emission Unit Descriptions

| The following emission units are subject to the emission limitations and work practice requirements in sections 5.2 through 5.6 of the AOP. |   |  |
|---|---|--|
| Emission Unit   | Description   | Control Equipment  |
| Nebraska Boiler<br>Section 5.2  | 203 MM Btu/hour propane-fired boiler. Constructed in 1985. Retrofitted with ultra-low-NOx burner in 2000.   | None   |
| Fluidized Bed Boiler (FBB)<br>Section 5.3   | 64.1 MM Btu/hour boiler constructed in 2001. Burns dried sludge from facility wastewater treatment plant ( $\approx 70\%$ ) and wood waste generated onsite or trucked in ( $\approx 30\%$ ). Propane is used during startup or when fuel is unusually wet.   | Baghouse for particulate matter.<br>Lime injection for SO <sub>2</sub><br>SNCR for NOx |
| Thermo-Mechanical Pulping (TMP)<br>Section 5.4  | Includes the following emission points: <ul style="list-style-type: none"> <li>• TMP heat recovery system vent (TMP1)</li> <li>• Atmospheric pre-steaming bin #2 vent (TMP2)</li> <li>• TMP whitewater tank vent (TMP3)</li> <li>• Refined SLF/transfer tank vent.(TMP4)</li> </ul>   | None   |
| Papermaking, dryer section<br>Section 5.5   | <ul style="list-style-type: none"> <li>• Dryer exhaust stacks #1, #2 and #3: Warm, moist air from dryers is routed through a heat recovery plenum and an economizer before venting. Exhaust at approximately 114°F and 10% moisture.(PM1, PM2 &amp; PM3)</li> <li>• Dryer exhaust stack #4: Exhausts dryer air which has not been routed through the economizer. Exhaust at approximately 154°F and 15% moisture.(PM4)</li> </ul> | None   |
| Papermaking (PM), wet end<br>Section 5.6  | Includes the following emission points: <ul style="list-style-type: none"> <li>• Vacuum sump exhaust vent</li> <li>• Off machine silo exhaust vent</li> <li>• Former exhaust fan vent</li> <li>• Press pit pulper vent</li> <li>• Dry end pulper vent</li> </ul>  | None   |

|   |  |   |
|---|--|---|
| <p>The following insignificant emission units or processes are also listed on Attachment 2. Insignificant emission units are not subject to specific requirements from Notice of Construction Approval Orders, NSPS standards, etc., but are subject to the facility-wide requirements in Section 5.1 of the AOP. Insignificant emission units are not subject to the monitoring, recordkeeping and reporting in Section 6.</p> |  |   |
| Wood Chip Handling  | <ul style="list-style-type: none"> <li>• Truck dump</li> <li>• Air density separator</li> <li>• Chip storage bins (4)</li> <li>• Chip storage piles (4)</li> </ul> | 2 cyclones (truck dump and air density separator)         |
| FBC   | <ul style="list-style-type: none"> <li>• Lime silo</li> <li>• Ash receiving</li> <li>• Ash silo</li> <li>• Reclaimed sludge hopper</li> </ul>                      | Bin vent filter<br>Vent filter<br>Bin vent filter<br>none |
| Deinking plant  | <ul style="list-style-type: none"> <li>• Pulper</li> </ul>   | none  |
| Wastewater treatment  | Screens, clarifiers, carrousels, sludge press, sludge storage and transfer.  | none  |

Attachment 2

Insignificant Emission Units

| <b>Insignificant emission units or activities designated under WAC 173-401-530(a)</b> |                              |
|---|------------------------------|
| <b>Emission unit or activity</b>  | <b>Basis for designation</b> |
| Emergency diesel fire pump (1)  | Actual emissions <(4)(a)-(e) |
| Chip air density separator (1)  | Actual emissions <(4)(e)     |
| Chip cyclone (1)  | Actual emissions <(4)(e)     |
| FBB Ash system receiver filter (1)  | Actual emissions <(4)(e)     |
| FBB Ash silo vent filter  | Actual emissions <(4)(e)     |
| Chip Tunnel Vacuum System   | Actual emissions <(4)(e)     |

| <b>Insignificant emission units or activities designated under WAC 173-401-530 (d)</b>  |                                   |
|---|-----------------------------------|
| <b>Emission unit or activity</b>  | <b>Basis for designation</b>      |
| Facility Roads and Parking Lots   | Generates only fugitive emissions |
| Chip unloading, handling, storage piles(2), reclaiming operations   | Generate only fugitive emissions  |
| Reject storage bunkers(4), handling and reclaiming operations   | Generate only fugitive emissions  |
| Biomass (hog fuel) unloading, handling, storage & reclaiming operations   | Generate only fugitive emissions  |
| Wastewater screens, primary clarifier, HYPM clarifier, SAC tank, carrouseles(2), secondary clarifiers(2), aerated storage basin | Generate only fugitive emissions  |
| Deinking wastepaper handling, flotation cells, disk filter  | Generate only fugitive emissions  |

| <b>Insignificant emission units or activities designated under WAC 173-401-533</b>   |  |
|--|--|
| <b>Emission unit or activity</b>   | <b>Basis for designation</b>   |
| Gasoline storage tank; 500 gallons   | 533(2)(c): Capacity < 10,000 gallons   |
| Diesel storage tanks; 300 gallons & 1,100 gallons  | 533(2)(c): Capacity < 10,000 gallons   |
| Dye tanks(4); 2,000 gallons each   | 533(2)(c): Capacity < 10,000 gallons   |
| Defoamer tanks(4); 600 gallons, 1,700 gallons, 2@2,000 gallons   | 533(2)(c): Capacity < 10,000 gallons   |
| Propane unloading; propane storage tanks(5)@30,000 gallons each; propane filling tank(1), 1,500 gallons  | 533(2)(d): propane storage & loading, capacity <40,000 gallons   |
| Pressure washers(4) gasoline & diesel<br>Scissor lifts(2)gasoline/propane<br>Chain saws(2), gasoline<br>Weed eaters(2), gasoline<br>Lawnmowers(2), gasoline<br>Snow blowers(1), gasoline<br>Portable trash pumps(2)diesel, gasoline<br>Air compressors(2), diesel, gasoline<br>Welding generator(1), gasoline<br>Confined space blowers, <13hp   | 533(2)(f): Combustion source, less than five hundred thousand Btu/hr, using any commercial fuel containing less than 0.4% by weight sulfur for coal or less than 1% by weight sulfur for other fuels.  |
| Used oil heaters(2), 175,000 & 250,000 Btu/hr  | 533(2)(h) Combustion source, not greater than five hundred thousand Btu/hr burning used oil  |
| Raw water treatment systems, 5 million gallons/day   | Municipal and industrial water chlorination facilities of not greater than twenty million gallons per day capacity.  |
| Space heaters(2), 350,000 Btu/hr each  | 533(2)(r) Space heaters and hot water heaters using natural gas, propane or kerosene and generating less than five million Btu/hr.   |
| Tanks and vessels w/associated pumps:<br>Borol(2)<br>Sodium hydroxide/caustic(4),<br>Sodium hydrosulfite(5)<br>Sodium bromide(1)<br>Talc(3)<br>Clay(4)<br>Carbon(2)<br>Sodium silicate(1)<br>Sodium hypochlorite(1)<br>Sodium sulfite(2)<br>Amine(1)<br>Brine(1)<br>Phosphoric Acid 35-70%(1)<br>93% sulfuric acid, 93% (1)<br>Liquid urea(2)<br>Retention aids/fixatives/coagulants(6)<br>Polymers(4) | 533(2)(s) Tanks, vessels, and pumping equipment, with lids or other appropriate closure for storage or dispensing of aqueous solutions of inorganic salts, bases and acids excluding:<br>(i) 99% or greater H <sub>2</sub> SO <sub>4</sub> or H <sub>3</sub> PO <sub>4</sub><br>(ii) 70% or greater HNO <sub>3</sub><br>(iii) 30% or greater HCl<br>(iv) More than one liquid phase where the top phase is more than one percent VOCs. |

| <b>Insignificant emission units or activities designated under WAC 173-401-533<br/>(continued)</b> |  |
|--|--|
| Glycol system: tanks(2), pumps(3), coils(1), heat exchangers(3)                                    | 533(2)(t) Equipment used exclusively to pump, load, unload or store high boiling organic material, material with initial boiling point (IBP) not less than 150°C. or vapor pressure (vp) not more than 5mm Hg at 21°C. with lids or other appropriate closure. |
| WWT Laboratory vacuum hood   | 533(3)(c) Analytical Laboratory Equipment  |
| Main Laboratory vacuum hood  | 533(3)(c) Analytical Laboratory Equipment  |

| <b>Insignificant emission units or activities designated categorically exempt under WAC 173-401-532</b>   |                              |
|---|------------------------------|
| <b>Emission unit or activity</b>  | <b>Basis for designation</b> |
| Mobile transport tanks on vehicles, except for those containing asphalt.<br><i>(Includes railcars containing SO<sub>2</sub>)</i>  | 532(2)                       |
| Lubricating oil storage tanks   | 532(3)                       |
| Storage tanks, reservoirs and pumping and handling equipment of any size, limited to soaps, lubricants, hydraulic fluid, vegetable oil, grease, animal fat, aqueous salt solutions or other materials and processes using appropriate lids and covers where there is no generation of objectionable odor or airborne particulate matter. <i>(Includes 38 tanks from 40 to 8,500 gallons capacity)</i> | 532(4)                       |
| Pressurized storage of oxygen, nitrogen, carbon dioxide, air, or inert gases <i>(includes compressed air and instrumental air systems).</i>   | 532(5)                       |
| Storage of solid material, dust-free handling <i>(includes clay and filler storage).</i>  | 532(6)                       |
| Vehicle exhaust from auto maintenance and repair shops.   | 532(7)                       |
| Vents from continuous monitors and other analyzers  | 532(8)                       |
| Vents from rooms, buildings and enclosures that contain permitted emission units or activities from which local ventilation, controls and separate exhaust are provided   | 532(9)                       |
| Internal combustion engines for propelling or powering a vehicle (includes 51 self-propelled clamp trucks, forklifts, pickups, dump trucks, loaders, dozers, bobcats).  | 532(10)                      |
| Brazing, soldering and welding equipment and oxygen-hydrogen cutting torches for use in cutting metal where in components of the metal do not generate HAPs or HAPs precursors  | 532(12)                      |
| Plant upkeep including routine housekeeping, preparation for and painting of structures or equipment, retarring roofs, applying insulation to buildings in accordance with applicable environmental and health and safety requirements and paving or stripping parking lots <i>(includes storage and use of biocides, slimicides, and felt washes and cleaners).</i>                                  | 532(33)                      |
| Agricultural activities on a facility's property that are not subject to registration or new source review by the permitting authority.   | 532(34)                      |
| Cleaning and sweeping of streets and paved surfaces.  | 532(35)                      |
| Hot melt adhesive application with no VOCs in the adhesive formulation <i>(includes PM wrapline).</i>   | 532(37)                      |
| Steam cleaning operations   | 532(39)                      |
| Portable drums and totes <i>(including dyes and slimicides in totes).</i>   | 532(42)                      |
| Lawn and landscaping activities <i>(includes 2 lawnmowers, one snow blower, two weed-eaters, two chainsaws).</i>  | 532(43)                      |
| General vehicle maintenance including vehicle exhaust from repair facilities  | 532(45)                      |
| Comfort air conditioning or air cooling systems, not used to remove air contaminants from specific equipment  | 532(46)                      |
| Natural draft hoods, natural draft stacks, or natural draft ventilators for sanitary and storm drains, safety valves, and storage tanks subject to size and service limitations expressed elsewhere in this section.  | 532(47)                      |
| Natural and forced air vents and stacks for bathroom/toilet facilities  | 532(48)                      |
| Office activities   | 532(49)                      |
| Personal care activities.   | 532(50)                      |
| Sampling connections used exclusively to withdraw materials for laboratory analyses and testing.  | 532(51)                      |

| <b>Insignificant emission units or activities designated categorically exempt under WAC 173-401-532</b>   |         |
|---|---------|
| Fire fighting and similar safety equipment and equipment used to train fire fighters excluding fire drill pits ( <i>includes one fire truck and one ambulance</i> ).  | 532(52) |
| Fuel and exhaust emissions from vehicles in parking lots.   | 532(54) |
| Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, sintering or polishing: Ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood provided that:<br>(a) Activity is performed indoors;<br>(b) Particulate emission control in the immediate vicinity of the activity;<br>(c) Exhaust from the particulate control is within the building housing the activity;<br>(d) No fugitive particulate emissions enter the environment. | 532(55) |
| Demineralization and oxygen scavenging (deaeration) of water ( <i>including EDTA tank</i> ).  | 532(61) |
| Laser trimmers, using dust collection to prevent fugitive emissions ( <i>including PM winder and PM splitter</i> ).   | 532(63) |
| Structural changes not having air contaminant emissions   | 532(67) |
| Mixing, packaging, storage and handling activities of any size, limited to soaps, lubricants, vegetable oil, grease, animal fat, aqueous salt solutions.  | 532(69) |
| Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy, e.g., blueprint activity, photocopiers, mimeograph, telefax, photographic developing, and microfiche.  | 532(70) |
| Paper trimmers/binders ( <i>includes PM wet-end tail cutter, PM dry-end tail cutter, PM winder, PM splitter, Pm core cutter, PM core notcher, and PM core beveler</i> ).  | 532(72) |
| Sample gathering, preparation and management.   | 532(73) |
| Repair and maintenance activities, not involving installation of an emission unit and not increasing potential emissions of a regulated air pollutant ( <i>includes four pressure washers and two scissor lifts</i> ).  | 532(74) |
| Hydraulic and hydrostatic testing equipment.  | 532(76) |
| Batteries and battery charging.   | 532(77) |
| Solid waste (as defined in the Washington Administrative Code) containers.  | 532(79) |
| Humidity chambers   | 532(83) |
| Environmental chambers not using hazardous air pollutant (HAPs) gasses.   | 532(85) |
| Totally enclosed conveyors ( <i>including chip conveyors</i> ).   | 532(86) |
| Steam vents and safety relief valves.   | 532(87) |
| Air compressors, pneumatically operated equipment, systems and hand tools.  | 532(88) |
| Steam leaks.  | 532(89) |
| Process water and white water storage tanks (including hot water, cooling water, shower water, seal water and filtrate tanks <sup>10</sup> ).   | 532(94) |
| Demineralizer tanks   | 532(95) |
| Clean condensate tanks  | 532(96) |
| Alum tanks  | 532(97) |

<sup>10</sup> TMP whitewater tank does not qualify – subject to requirement in NOC Order

|  |          |
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| Broke beaters, repulpers, pulp and repulping tanks, stock chests and pulp handling ( <i>includes medium consistency chests, transfer chests, leveling chests, PM couch pit pulper, PM press pulper, PM dry-end pulp, PM winder pulper, PM blend chest, PM machine chest, PM off-machine silo, PM broke chests, PM saveall, PM saveall mix tank, DI pulper, DI dump chest, DI ink chest</i> ) <sup>11</sup> . | 532(98)  |
| Hydrogen peroxide tanks.   | 532(100) |
| Lime silos and feed bins (FBB)   | 532(105) |
| Paper forming ( <i>including PM wet-end headbox, PM former and PM press section</i> ).   | 532(106) |
| Vacuum systems exhausts ( <i>including PM wet-end vacuum system</i> ).   | 532(108) |
| Starch cooking   | 532(109) |
| Stock cleaning and pressurized pulp washing ( <i>including PM cleaner system, PM screen system, PM primary screen, PM saveall, PM saveall mix tank, PM thickener screens, DI HD cleaners, DI coarse screens, DI fine screens and DI disc filter</i> ).   | 532(110) |
| Winders ( <i>including PM calendar rolls, PM reel and PM winder</i> ).   | 532(111) |
| Chipping   | 532(112) |
| Sludge dewatering and handling ( <i>including DI ESD tank, DI ESD press, DI sludge storage, WTS sludge presses, WTS sludge storage</i> )   | 532(114) |
| Screw press vents ( <i>DI screw press, DI ESD press, WTS dewatering press</i> ).   | 532(115) |
| Pond dredging ( <i>including WTS aerated storage basin</i> )   | 532(116) |
| Polymer tanks and storage devices and associated pumping and handling equipment, used for solids dewatering and flocculation.  | 532(117) |
| Non-PCB oil filled circuit breakers, oil filled transformers and other equipment that is analogous to, but not considered to be, a tank.   | 532(118) |
| Electric or steam-heated drying ovens and autoclaves ( <i>including CHIP lab, TMP lab, HYPM lab and PM lab drying ovens</i> ).   | 532(119) |
| Sewer manholes, junction boxes, sumps and lift stations associated with wastewater treatment systems.  | 532(120) |
| Water cooling towers processing exclusively noncontact cooling water.  | 532(121) |

<sup>11</sup> SLF/transfer tank does not qualify – subject to requirement in NOC Order