

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

IN THE MATTER OF THE COMPLIANCE BY ) AIR OPERATING PERMIT  
BOISE CASCADE WOOD PRODUCTS, L.L.C. ) No. 16AQ-E004  
KETTLE FALLS LUMBER )  
610 West 3<sup>rd</sup> Avenue, Kettle Falls, Washington 99141 )  
with Section 70.94.161 RCW, Operating Permits for ) FINAL PERMIT  
Air Contaminant Sources, and the applicable rules and )  
Regulations of the Department of Ecology )

To: Boise Cascade Wood Products, L.L.C.  
1274 South Boise Rd.  
Kettle Falls, Washington 99141

Issue Date: June 20, 2016  
Effective Date: June 21, 2016  
Expiration Date: June 20, 2021

Responsible Official: Mr. Robert Glover

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

Hereinafter, Boise Cascade Wood Products, LLC, Kettle Falls Lumber is called the permittee. The permittee is required to comply with the provisions contained within this permit.

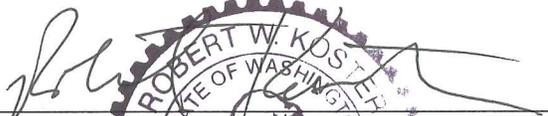
The Renewal Air Operating Permit, DATED at Spokane, Washington, the 20<sup>th</sup> day of June, 2016.

PREPARED BY:

  
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Eastern Region Air Quality Section  
Department of Ecology  
State of Washington

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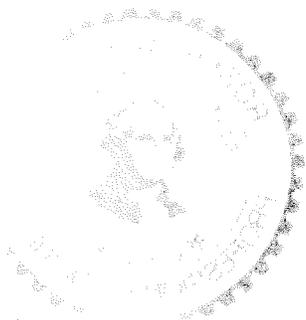
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APPROVED BY:

  
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State of Washington



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## LIST OF ABBREVIATIONS

AOP	Air Operating Permit
BACT	Best Available Control Technology
BTU	British Thermal Units
°C	Degrees Celsius
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
dscf	Dry Standard Cubic Foot
dscf/m	Dry Standard Cubic Foot per minute
Ecology	Washington State Department of Ecology
E.I.T.	Engineer in Training
EPA	United States Environmental Protection Agency
°F	Degrees Fahrenheit
FCAA	Federal Clean Air Act
FDCP	Fugitive Dust Control Plan
ft <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
SERP	Source Emission Reduction Plan
scfm	Standard Cubic Feet per Minute
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
TAP	Toxic Air Pollutant
TPY	Tons Per Year
TSP	Total Suspended Particulate
VOC	Volatile Organic Compound
WAC	Washington Administrative Code
yr	Year

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

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

Part 70 Air Operating Permits  
U.S. EPA Region 10, AWT-150  
1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101

## 1. STANDARD CONDITIONS

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### 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), 03/05/16], [WAC 173-401-640(1), 03/05/16]

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

[WAC 173-401-625, 03/05/16], [WAC 173-400-111(10), 6/11/15]

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

[WAC 173-401-620(2)(f), 930(3), 03/05/16], [RCW 70.94.162(1), 2005 (S)], [Order No. DE 94AQ-E169 Second Amendment, Issued 5/17/96, Approval Condition 6.10]

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

[WAC 173-401-620(2)(j), 03/05/16]

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

[WAC 173-401-620(2)(d), 03/05/16]

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

**1.6.1** Enter upon the permittee's premises where a chapter 401 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

**1.6.2** Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.

**1.6.3** Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

- 1.6.4** As authorized by WAC 173-400-105 and the FCAA, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.
- 1.6.4.1** Ecology may require the permittee to conduct stack testing and/or ambient air monitoring and report the results to Ecology.
- 1.6.4.2** Ecology may conduct or require a test be conducted using approved methods from 40 CFR parts 51, 60, 61 and 63 (in effect on July 01, 2015), or Ecology's Source Test Manual – Procedures for Compliance Testing. Permittee shall be required to provide a platform and sampling ports as well as safe and adequate access to them. Ecology shall be allowed to obtain a sample from any emissions unit. The permittee shall be given opportunity to observe the sampling and obtain a sample at the same time.
- 1.6.5** No person shall obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his or her official duties.
- 1.6.6** Nothing in this condition shall limit the ability of EPA to inspect or enter the premises of the permittee under Section 114 or other provisions of the FCAA.  
[WAC 173-401-630(2), 03/05/16], [WAC 173-400-105(2), (4), 11/03/14], [RCW 70.94.200, 1/4/01 (S)], [Order No. DE 94AQ-E169 Second Amendment, Issued 5/17/96, Approval Conditions 4 and 6.4], [Order No. DE 93AQ-E111, Issued 3/19/93, Approval Conditions 7.3 and 8.5], [Order No. 04AQ-E115 1<sup>st</sup> Amendment, Issued 01/21/05, Approval Conditions 3.2.7, 8.3], [Order No. 10AQ-E389, Issued 02/25/11, Approval Condition 5.5]

- 1.7 Duty to Comply.** The permittee must comply with all conditions of this chapter 173-401 operating permit. Any permit noncompliance constitutes a violation of chapter 70.94 RCW and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.  
[WAC 173-401-620(2)(a), 03/05/16], [Order No. DE 94AQ-E169 Second Amendment, Issued 5/17/96, Approval Condition 6.8], [Order No. DE 93AQ-E111, Issued 3/19/93, Approval Condition 8.9], [Order No. 04AQ-E115 1<sup>st</sup> Amendment, Issued 01/21/05, Approval Condition 8.8]

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

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

[WAC 173-401-620(2)(e), 03/05/16], [WAC 173-400-105(7), (8), 11/03/14]

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

[WAC 173-401-500(6), 03/05/16]

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

[WAC 173-401-620(2)(b), 03/05/16]

**1.11 Excess Emissions Due to an Emergency.** The permittee may seek to establish that noncompliance with a technology-based<sup>1</sup> emission limitation under this permit was due to an emergency.<sup>2</sup> To do so, the permittee shall demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that:

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

**1.11.2** The permitted facility was being properly operated at the time of the emergency,

**1.11.3** During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in this permit, and

**1.11.4** The permittee submitted notice of the emergency to Ecology within two (2) working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. E-mail or fax are the preferred notification methods. The notice should be directed to appropriate air quality personnel at Ecology's Eastern Regional Office using the most recent contact information.

[WAC 173-401-645, 03/05/16]

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

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

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

**1.12.3** Excess emissions due to scheduled maintenance shall be considered unavoidable if the source reports as required under **condition 1.13.1** and adequately demonstrates that the excess emissions could not have been avoided through reasonable design, better scheduling for maintenance or through better operation and maintenance practices.

**1.12.4** Excess emissions due to upsets shall be considered unavoidable provided the source reports as required under **condition 1.13.1** and adequately demonstrates that:

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

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

- 1.12.4.1 The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition.
- 1.12.4.2 The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance.
- 1.12.4.3 The operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded.

[WAC 173-400-107, 9/20/93, 04/01/11 (S)], [Order No. DE 93AQ-E111, Issued 3/19/93, Approval Condition 3]

### 1.13 Reporting.

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

- 1.13.1.1 Deviations which represent a potential threat to human health or safety, or which the source believes to be unavoidable (§1.12) shall be reported as soon as possible, but in no case later than twelve (12) hours after the deviation is discovered.
- 1.13.1.2 Excess emissions due to emergency (§1.11), shall be reported within 2 working days of the event.
- 1.13.1.3 All other deviations shall be reported no later than thirty days after the end of the month during which the deviation is discovered.
- 1.13.1.4 For any month during with no permit deviations are discovered, the permittee shall submit a report no later than 30 days following the end of the month stating that no deviations were observed during that period

Upon request by Ecology, the permittee 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 in accordance with Condition 1.13.5 of monthly deviation reports shall be included in each semi-annual monitoring report covering all deviations reported during the previous six month period.

[WAC 173-401-615(3)(b), 630(1), 03/05/16], [WAC 173-400-107, 06/02/95, 04/01/11 (S)], [Order No. 04AQ-E115 1<sup>st</sup> Amendment, Issued 01/21/05, Approval Conditions 6.6, 7.1], Order No. 10AQ-E389, Issued 02/25/11, Approval Condition 3.1]

**1.13.2 Semi-Annual Monitoring** The permittee shall submit reports of any required monitoring (i.e., Monitoring Recordkeeping and Reporting identified in section 3) at least once every six (6) months. Six-month periods shall be from January 1<sup>st</sup> through June 30<sup>th</sup>, and from July 1<sup>st</sup> through December 31<sup>st</sup>.

- 1.13.2.1 Semi-annual monitoring reports shall be due no later than forty-five (45) days following the end of each six (6) month period.

- 1.13.2.2 All instances of deviations from permit requirements must be clearly identified in such reports.
- 1.13.2.3 The report must include identification of all months during which no deviations occurred.
- 1.13.2.4 All required reports must be certified by a responsible official consistent with Condition 1.13.6.
- 1.13.2.5 The first semi-annual monitoring report submitted under this Renewal AOP shall include all information required to be submitted under AOP 07AQ-E240 as well as any additional information required under this Renewal AOP.

[WAC 173-401-615(3)(a), 03/05/16]

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

[WAC 173-401-630(5)(a), 03/05/16], [WAC 173-401-630(1), 03/05/16] This MRRR includes gapfilling.

**1.13.3.1** The certification shall describe and include the following:

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

[WAC 173-401-630(5)(c), 03/05/16]

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

[WAC 173-401-630(5)(d), 03/05/16]

**1.13.3.3** The permittee may certify continuous compliance for insignificant emission units or activities if there were no observed, documented, or known instances of noncompliance during the reporting period.

[WAC 173-401-530(2)(d), 03/05/16]

**1.13.3.4** All compliance certifications shall include certification by a responsible official in accordance with condition 1.13.5.

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

applicable requirements if the appropriate performance or compliance test had been performed.

[40 CFR 52.33(a), 07/01/15]

**1.13.4 Emission Inventory.** The permittee shall submit an inventory of actual emissions from the source for each calendar year. The inventory shall include segmented stack and fugitive emissions of TSP, PM-10, SO<sub>2</sub>, CO, NO<sub>x</sub>, lead, and VOC's, and shall be submitted no later than **April 15<sup>th</sup>** of the following year. The source shall maintain records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards. Emissions inventories shall be sent to Ecology at the address included in this permit. Ecology may specify a different or additional submittal format in accordance with WAC 173-400-105(1), such as electronic submittal(s).

[WAC 173-400-105(1), 11/03/14], [Order No. 04AQ-E115 1<sup>st</sup> Amendment, Issued 01/21/05, Approval Condition 7.3]

**1.13.5 Greenhouse Gas Reporting.** If the permittee emits 10,000 metric tons of greenhouse gases (GHGs) or more per calendar year, GHGs are required to be reported to Ecology. (Note: WAC 173-441-030(5) details reporting requirements for facilities which are subject to the requirements, but fall below reporting thresholds). All requests, notifications, and communications to Ecology regarding GHGs, other than submittal of the annual GHG report, shall be submitted to: Greenhouse Gas Report, Air Quality Program, Department of Ecology, PO Box 47600, Olympia, WA 98504-7600. Annual GHG reports shall be submitted through Ecology's GHG Reporting page at [http://www.ecy.wa.gov/programs/air/permit\\_register/ghg/ghg.html](http://www.ecy.wa.gov/programs/air/permit_register/ghg/ghg.html).

Reports must meet the requirements of WAC 173-411-050 and include the annual emissions of the GHGs listed in WAC 173-441-040 from source categories listed in WAC 173-441-120. The annual GHG report must be submitted electronically in accordance with WAC 173-441-050 and WAC 173-441-060, in a format specified by Ecology. The GHG report is due to Ecology by October 31<sup>st</sup> of each year for the previous calendar year, unless the facility is also required to submit a GHG report to EPA, then the GHG report is due to Ecology March 31<sup>st</sup> of each year for GHG emissions from the previous calendar year.

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

[Chapter 173-441 WAC, 01/01/11]

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

[WAC 173-401-520, 03/05/16], [WAC 173-401-500(6), 03/05/16]

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

[WAC 173-401-620(2)(h), 03/05/16], [RCW 70.94.905, 1/4/01 (S)]

## **1.15 Administrative Permit Amendments**

**1.15.1** An administrative permit amendment is a permit revision that:

**1.15.1.1** Corrects typographical errors within the permit,

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

**1.15.1.3** Requires more frequent monitoring or reporting by the permittee, or

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

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

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

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

[WAC 173-401-720, 03/05/16]

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

[WAC 173-401-620(2)(c), 03/05/16]

## **1.17 Reopening for Cause**

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

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

**1.17.1.2** Additional requirements (including excess emissions requirements) become applicable under the acid rain program.

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

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

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

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

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

[WAC 173-401-730, 03/05/16]

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

**1.18.1** The proposed changes shall not weaken the enforceability of any existing permit conditions.

**1.18.2** Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition.

**1.18.3** Before or contemporaneously with making the off-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, pollutants emitted, and any applicable requirements that would apply as a result of the change.

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

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

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

[WAC 173-401-724, 03/05/16]

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

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

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

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

- 1.19.1.3 The proposed changes do not alter permit terms that are necessary to enforce limitation on emissions from units covered by the permit;
- 1.19.1.4 The facility provides Ecology and EPA with written notification at least seven days prior to making the proposed changes except that written notification of a change made in response to an emergency shall be provided as soon as possible after the event;
  - 1.19.1.4.1 The written notification shall include a brief description of the change within the permitted facility, the date on which the change will or did occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

[WAC 173-401-722(2), 03/05/16]

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

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

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

[WAC 173-401-722, 03/05/16], [WAC 173-401-620(2)(g), 03/05/16]

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

[WAC 173-400-110, 05/29/15, 12/29/12 (S)], [WAC 173-400-113, 05/29/15, 12/29/12 (S)], [WAC 173-455-120, 12/31/12 (S)], [WAC 173-400-720, 05/29/15, 12/29/12 (S)], [WAC 173-400-171, 05/29/15, 12/29/12 (S)], [WAC 173-460, 06/20/09 (S)], [RCW 70.94.152, 1/4/01 (S)], [Order No. DE 94AQ-E169 Second Amendment, Issued 5/17/96, Approval Condition 1], [Order No. DE 93AQ-E111, Issued 3/19/93, Approval Condition 1]

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

[WAC 173-455-100, 12/31/12 (S)], [WAC 173-400-114, 12/29/12 (S)], [RCW 70.94.153, 1/4/01 (S)]

**1.22 Operational Flexibility**

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

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

[WAC 173-401-650, 03/05/16]

**1.23 Permit Appeals.** This permit or any conditions in it may be appealed

This permit or any conditions in it may be appealed only by filing an appeal with the pollution control hearings board and serving it on the permitting authority within thirty days of receipt pursuant to RCW 43.21B.310. This provision for appeal in this section is separate from and additional to any federal rights to petition and review under § 505(b) of the FCAA.

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

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

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

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

Address and Location Information:

Street Addresses

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

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

Mailing Addresses

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

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

[WAC 173-401-620(2)(i), 03/05/16], [WAC 371-08-335, 02/14/15]

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

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

- 1.24.1.1** Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- 1.24.1.2** Equipment used during the maintenance, service, repair or disposal must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- 1.24.1.3** Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
- 1.24.1.4** Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. (“MVAC-like appliance” is defined at 40 CFR 82.152.)
- 1.24.1.5** Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156.
- 1.24.1.6** Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep servicing records documenting the date and type of service, as well as the quantity of refrigerant added. The owner/operator must keep records of refrigerant purchased and added to such appliances in cases where owners add their own refrigerant. Such records should indicate the date(s) when refrigerant is added pursuant to 40 CFR 82.166.
- 1.24.1.7** Persons conducting maintenance, service, repair, or disposal of appliances must follow the prohibitions pursuant to 40 CFR 82.154.
- 1.24.1.8** Person performing maintenance, service, repair, or disposal of appliances must certify to the Administrator that such person has acquired certified recovery of recycling equipment pursuant to 40 CFR 82.162.

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

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

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

[40 CFR 82, 07/01/15], [RCW 70.94.970, 1/4/01 (S)], [RCW 70.94.980, 1/4/01 (S)]

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

[WAC 173-401-605(3), 03/05/16], [RCW 70.94.154, 1/4/01 (S)]

## **1.26 Compliance Schedules**

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

[WAC 173-401-510(2)(h)(ii)(A), 03/05/16], [WAC 173-401-510(2)(h)(ii)(B), 03/05/16], [WAC 173-401-630(3), 03/05/16]

## **1.27 Record Keeping**

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

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

**1.27.1.2** The date(s) analyses were performed.

**1.27.1.3** The company or entity that performed the analysis.

**1.27.1.4** The analytical techniques or methods used.

**1.27.1.5** The results of such analyses.

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

[WAC 173-401-615(2)(a), 03/05/16]

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

[WAC 173-401-615(2)(b), 03/05/16]

**1.27.3** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings from continuous monitoring instrumentation, and copies of all reports required by this permit.

[WAC 173-401-615(2)(c), 03/05/16]

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

[WAC 173-401-630(2)(b), 03/05/16]

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

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

[WAC 173-401-640(4), 03/05/16]

**1.29 Permit Renewal and Expiration.** This permit is issued for a fixed term of 5 years. The permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application (as outlined in WAC 173-401-510) is submitted at least 12 months, but no greater than 18 months prior to the date of permit expiration. A complete renewal application is due no later than June 20, 2020. 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, 03/05/16], [173-401-710, 03/05/16]

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

[40 CFR 61, Subpart M, 07/01/15], [WAC 173-400-075(1), 12/29/12 (S)]

**1.31 Nonroad Engines.** Prior to installation or operation of a non-road engine, as defined in WAC 173-400-030(56), the permittee shall meet the requirements of WAC 173-400-035. If the nonroad engine(s) has a cumulative maximum rated brake horsepower greater than 500, a notification of intent to operate will be submitted to Ecology. If the nonroad engine(s) has a cumulative maximum rated break horsepower greater than 2,000, the permittee will not operate the engine(s) unless Ecology issues written approval to operate.

[WAC 173-400-035, 12/29/12 (S)]

**2. APPLICABLE REQUIREMENTS**

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Until this permit expires, is modified or revoked, this permittee is authorized to operate the air emission units and processes outlined in Sections 2.1 through 2.7. These emission units and processes are subject to the conditions included in Sections 2.1 through 2.7, Section 3, and to other terms and conditions specified in this permit. Condition numbers that are denoted with an asterisk indicate that streamlining of a less stringent requirement has taken place and is described in section 12.0 of the Statement of Basis.

The column entitled **Description** in each table contains only a summary/paraphrase of the condition, emission standard or work practice. The condition, emission standard, or work practice itself is the enforceable requirement and should be referenced for actual language.

### Testing Requirements

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

[WAC 173-401-615(1)(a), 03/05/16], [WAC 173-401-630(1), 03/05/16], [WAC 173-400-105(4), 11/03/14], [Order No. DE 94AQ-E169 Second Amendment, Issued 5/17/96, Approval Conditions 2.1 and 5.2], [Order No. DE 93AQ-E111, Issued 3/19/93, Approval Conditions 7.1 and 7.2]. This MRRR includes gapfilling.

### 2.1 Section #1, Facility Wide

This section is applicable and enforceable with respect to all emission units source wide, including those emission units in Sections 2.2 through 2.5. Monitoring, recordkeeping and reporting requirements in this section do not apply to insignificant emission units.

**TABLE 2.1**

<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal &amp; State = F) (State Only = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
2.1.1	WAC 173-400-040(1), (2)(a), and (2)(b) 11/03/14	F	Visible emissions shall not exceed 20% opacity for more than 3 minutes in any one hour	RM 9	2M
2.1.2	WAC 173-400-060 11/03/14	F	General process units are required to meet all applicable provisions of WAC 173-400-040 and emissions of particulate material from any operation shall not exceed 0.1 grain/dscf of exhaust gas	RM 5	2M
2.1.3	WAC 173-400-040(3) 04/01/11	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		1M
2.1.4	WAC 173-400-040(4)(a), (9)(a) 11/03/14	F	The source shall perform maintenance to minimize emissions and take reasonable precautions to prevent fugitive dust from becoming airborne		1M
2.1.5	WAC 173-400-040(4)(a), (9)(a) 11/03/14	F	Fugitive dust control measures shall be taken to prevent fugitive emissions		1M, 2M

2.1.6	WAC 173-400-040(5) 4/01/11	S	Any producer of an odor which may unreasonably interfere with any other property owner's use and enjoyment of their property must reduce the odor to a reasonable minimum		<b>1M</b>
2.1.7	WAC 173-400-040(6) 11/03/14	F	No person shall cause or permit the emission of any air contaminant detrimental to the health, safety, or welfare of any person, or causes damage to property or business		<b>1M</b>
2.1.8	Order No. 04AQ-E115 1 <sup>st</sup> Amendment Approval Condition 7.2 Issued 01/21/05	F	Information regarding all complaints shall be recorded and submitted to Ecology within 3 business days		<b>1M</b>
2.1.9	WAC 173-400-040(8) 11/03/14	F	No person shall conceal or mask an emission of an air contaminant.		<b>1M</b>
2.1.10	WAC 173-400-200(2) 11/03/14	F	No source may use dispersion techniques or excess stack height to meet ambient air quality standards or PSD increment limitations		<b>1M</b>
2.1.11	WAC 173-400-205 11/03/14	F	The permittee shall not vary the rate of emission of a pollutant according to atmospheric conditions, except as directed according to air pollution episode regulations		<b>1M</b>
2.1.12	RCW 70.94.040 1/4/01	S	The permittee shall not cause air pollution in violation of Chapter 70.94 RCW		<b>1M</b>
2.1.13	Order No. DE 94AQ-E169 2nd Amendment Approval Condition 6.2 Issued 5/17/96; Order No. DE 93AQ-E111 Approval Condition 8.3; Issued 3/19/93 WAC 173-425, 4/13/00	F	Open burning is not allowed on site, except in accordance with WAC 173-425		<b>1M</b>
2.1.14	WAC 173-400-040(1) 11/03/14 (RCW 70.94.154(1))	F S	All emissions units are required to use RACT		<b>1M</b>

**2.2 Section #2, Hog Fuel Boiler**

**TABLE 2.2**

<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal &amp; State = F) (State Only = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
2.2.1*	Order No. 04AQ-E115 1 <sup>st</sup> Amendment Issued 01/21/05 Approval Conditions 1.3, 1.5, 2.2, 6.4	F	Opacity from the ESP stack shall not exceed 10% (6-minute average) as measured by COMS and RM 9	RM 9	<b>2M, 4M</b>
2.2.2*	Order No. 04AQ-E115 1 <sup>st</sup> Amendment Approval Conditions 2.1, 3.1, 3.2 Issued 01/21/05 40 CFR 64.3, 64.4(c), 64.7 07/01/15	F	PM emissions shall be ≤ 0.011 grains per dry standard cubic foot (7% O <sub>2</sub> )	RM 5	<b>3M, 4M, 5M</b>
2.2.3	Order No. DE 78-496 3 <sup>rd</sup> Amendment, Issued 01/21/05 Approval Condition 1	F	Particulate matter emissions shall not exceed 50 tons annually	RM 5 RM 202	<b>1M, 3M, 4M, 5M</b>
2.2.4	WAC 173-400-040 (7), 1st, 11/03/14	F	SO <sub>2</sub> ≤ 1000 ppm @ 7% O <sub>2</sub> (Sixty minute average)	RM 6	<b>1M</b>
2.2.5	Order No. 04AQ-E115 1st Amendment Issued 01/21/05 Approval Conditions 1.2, 7.4	F	Steam production shall be limited based on the most recent emission testing, per 3M. The limit shall be a daily average.		<b>1M, 3M, 4M</b>
2.2.6	Order No. 04AQ-E115 1st Amendment, Approval Condition 1.1, Issued 01/21/05	F	Both fields of the ESP shall be on line during all times of hog fuel boiler operation		<b>1M</b>
2.2.7	Order No. 04AQ-E115 1st Amendment Issued 01/21/05 Approval Condition 8.1	F	Ash collected in the ESP shall be conveyed via screw-drive or equivalent to a completely enclosed container – Transport of ash to final disposal location shall not result in visible fugitive emissions		<b>1M, 2M</b>
2.2.8	WAC 173-400-070(2)(b) 11/03/14	F	All hog fuel boilers shall utilize RACT and shall be operated and maintained to minimize emissions		<b>1M, 7M</b>
2.2.9	Order No. 04AQ-E115 1st Amendment Issued 01/21/05 Approval Conditions 4	F	O&M manual shall be followed and kept updated		<b>1M, 7M</b>

**TABLE 2.2 (continued)**

<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal &amp; State = F) (State Only = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
2.2.10	Order No. DE 78-496 3rd Amendment Issued 01/21/05 Approval Condition 2 WAC 173-435-040 01/15/93	F	The permittee shall comply with the requirements included in the Source Emission Reduction Plan (SERP) for the mill		1M
2.2.11	Order No. 04AQ-E115 1st Amendment Issued 01/21/05 Approval Condition 8.4 WAC 173-400-111(10) 06/11/15	F	Legible copies of Approval Order and O&M Manual shall be kept on site and available to employees in direct operation of the boiler, multiclone, and ESP and shall be available for review upon request by Ecology		1M
2.2.12	Order No. 04AQ-E115 1st Amendment Issued 01/21/05 Approval Condition 8.5, 8.7	F	The boiler and associated equipment must be operated in a manner consistent with the O&M manual and NOC application		1M, 4M, 7M
2.2.13	Order No. 04AQ-E115 1st Amendment Approval Condition 8.6 Issued 01/21/05	F	Any modification to the ESP or operating procedures shall be reported to Ecology		4M
2.2.14	Order No. 04AQ-E115 1st Amendment Issued 01/21/05 Approval Condition 8.2	F	Order No. 04AQ-E115 becomes void if operation of the boiler and associated equipment is discontinued for 18 months		1M
2.2.15	Order No. 04AQ-E115 1st Amendment Issued 01/21/05 Approval Conditions 6, 6.1, 6.1.1, 6.1.2, 6.1.3, 6.1.4, 6.1.5, 6.2, 6.3, 6.5 40 CFR 64.7(a), 64.7(b), 64.7(c)	F	The permittee shall conduct monitoring, recordkeeping and reporting and maintain the monitoring equipment specified, including but not limited to, maintaining necessary parts for routine repairs of the equipment		1M, 2M, 4M, 5M
2.2.16	40 CFR 63 JJJJJ Table 2(6) §63.11223(b) 07/01/15		Conduct biennial tune-ups every 2 years that shall be conducted no more than 25 months after the previous tune-up.		1M, 6M

**2.3 Section #3, Lumber Drying Kilns #1 through #5**

The Lumber Drying Kilns #1 through #5 and all sources of air emissions associated with the process are subject to those conditions, emission standards, and work practices included in Section 1. "Standard Conditions", Section 2.1 "Section #1 Facility Wide" and the associated Monitoring Recordkeeping and Reporting Requirements in Section 3.

**2.4 Section #4, Lumber Drying Kiln #6**

**TABLE 2.4**

<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal &amp; State = F) (State Only = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
2.4.1	Order No. DE 94AQ-E169 2 <sup>nd</sup> Amendment Approval Condition 2.1 Issued 05/17/96	F	Opacity from dry kiln exhaust shall not exceed 10% opacity over a six (6) minute interval	RM 9	2M
2.4.2	Order No. DE 94AQ-E169 2 <sup>nd</sup> Amendment Approval Condition 2.1 Issued 05/17/96	F	Particulate emissions from the dry kiln shall not be visible beyond the property line	RM 9 RM 22	1M
2.4.3	Order No. DE 94AQ-E169 2 <sup>nd</sup> Amendment Issued 05/17/96 Approval Conditions 1 and 6.9	F	Total dry kiln production shall not exceed 88,499,000 board feet of lumber per year		8M
2.4.4	Order No. DE 94AQ-E169 2 <sup>nd</sup> Amendment Issued 05/17/96 Approval Condition 6.1	F	No heating energy source other than steam heat shall be used with dry kiln #6		1M
2.4.5	Order No. DE 94AQ-E169 2 <sup>nd</sup> Amendment Issued 05/17/96 Section 3. BACT and Section 4. T-BACT	F	Automatic energy management of temperature and relative humidity shall be used during operation of dry kiln #6		1M
2.4.6	Order No. DE 94AQ-E169 2 <sup>nd</sup> Amendment Issued 05/17/96 Approval Condition 6.6	F	Copies of the Approval Order and O&M Manual shall be in the working vicinity and available to operators of the dry kiln		1M
2.4.7	Order No. DE 94AQ-E169, 2 <sup>nd</sup> Amendment Issued 05/17/96 Approval Condition 4	F	O&M manual shall be kept updated		9M
2.4.8	Order No. DE 94AQ-E169, 2 <sup>nd</sup> Amendment Issued 05/17/96 Approval Condition 6.7	F	The dry kiln and associated equipment must be operated in a manner consistent with the O&M manual and NOC application		1M
2.4.9	Order No. DE 94AQ-E169 2 <sup>nd</sup> Amendment Approval Condition 6.3 Issued 05/17/96	F	Order No. DE 94AQ-E169 becomes void if operation is discontinued for 18 months		1M

**2.5 Section #5, Planer Baghouse**

**TABLE 2.5**

<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal &amp; State = F) (State Only = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
2.5.1	Order No. DE 93AQ-E111, Issued 03/19/93 Approval Condition 2.3	F	Opacity from each baghouse exhaust shall be $\leq 10\%$ , averaged over a six minute period	RM 9	2M
2.5.2	Order No. DE 93AQ-E111 Issued 03/19/93 Approval Condition 8.1	F	No visible emissions from the baghouse shall be allowed beyond the property line	RM 9, RM 22	1M
2.5.3	Order No. DE 93AQ-E111 Issued 03/19/93 Approval Condition 2.1	F	Particulate Matter emissions from each baghouse exhaust shall be $< 0.01$ gr/dscf exhaust gas and $< 1.2$ lb/hr	RM 5 RM 202	2M
2.5.4	Order No. DE 93AQ-E111, Issued 03/19/93 Approval Conditions 1 and 5	F	Material collected by planer shaving and dust collection system shall be $\leq 25,000$ tons per year		10M
2.5.5	Order No. DE 93AQ-E111, Issued 03/19/93 Approval Condition 1	F	Any modification to the baghouse or its operating procedures shall be reported to Ecology		1M
2.5.6	Order No. DE 93AQ-E111, Issued 03/19/93 Section 3. RACT & Section 4. T-BACT	F	One 99.8% efficient H&R Mechanical Systems baghouse shall be installed, with an air to cloth ratio of 5.18:1 (35,200 cfm / 6,785 ft <sup>2</sup> )		1M
2.5.7	Order No. DE 93AQ-E111, Issued 03/19/93 Approval Condition 6	F	O&M manual shall be followed and kept updated to reflect any modifications		11M
2.5.8	Order No. DE 93AQ-E111, Issued 03/19/93 Approval Condition 3	F	Operation of planer dust processing without the baghouse operating shall be prevented by electrical interlocks or an administrative requirement in O&M manual		1M
2.5.9	Order No. DE 93AQ-E111, Issued 03/19/93 Approval Condition 8.2	F	The material collected by the baghouse shall be processed or controlled to minimize emissions		1M, 11M
2.5.9	Order No. DE 93AQ-E111, Issued 03/19/93 Approval Condition 8.2	F	The material collected by the baghouse shall be processed or controlled to minimize emissions		1M, 11M

2.5.10	Order No. DE 93AQ-E111, Issued 03/19/93 Approval Condition 8.4	F	Order No. DE 93AQ-E111 becomes void if operation is discontinued for 18 months		1M
2.5.11	Order No. DE 93AQ-E111, Issued 03/19/93 Approval Condition 8.7	F	Approval Order and O&M manual shall be in the working vicinity and available to employees in direct operation of the baghouse		1M
2.5.12	Order No. DE 93AQ-E111 Issued 03/19/93 Approval Condition 8.8	F	Operation of equipment shall be conducted in a manner consistent with information included in NOC application and O&M Manual		1M, 11M

**2.6 Section #6, Wood Residuals Collection and Transport System**

The Wood Waste Collection & Transport System and all sources of air emissions associated with the processes (excluding baghouses) are subject to those conditions, emission standards, and work practices included in Section 1. “Standard Conditions”, Section 2.1 “Section #1 Facility Wide Requirements” and the associated Monitoring Recordkeeping and Reporting Requirements in Section 3.

**2.7 Section #7, Cyclone C4 and Cyclone C5**

**TABLE 2.7**

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal & State = F) (State Only = S)	Description	Testing	MRRR Reference
2.7.1	Order No. 10AQ-E389, Issued 02/25/11 Approval Condition 2.1	F	Opacity from each cyclone exhaust shall be ≤ 10%, averaged over a six minute period	RM 9	2M
2.7.2	Order No. 10AQ-E389, Issued 02/25/11 Approval Condition 5.3	F	No visible emissions from the cyclones shall be allowed beyond the property line	RM 9 RM 22	1M
2.7.3	Order No. 10AQ-E389, Issued 02/25/11 Approval Condition 2.2	F	Particulate Matter emissions from each cyclone exhaust shall be ≤ 0.02 gr/dscf	RM 5 RM 202	2M
2.7.4	Order No. 10AQ-E389, Issued 02/25/11 Approval Condition 5.2	F	Material collected by the cyclones shall be routed through enclosed catch system.		1M
2.7.5	Order No. 10AQ-E389, Issued 02/25/11 Approval Condition 5.2	F	No visible emissions are allowed from the cyclone catch system.	RM 9 RM 22	1M
2.7.5	Order No. 10AQ-E389, Issued 02/25/11 Approval Condition 5.2	F	No visible emissions are allowed from the cyclone catch system.	RM 9 RM 22	1M
2.7.6	Order No. 10AQ-E389, Issued 02/25/11 Approval Condition 1.2	F	Any modification to cyclone C4 or C5 or their operating procedures shall be reported to Ecology		1M

2.7.7	Order No. 10AQ-E389, Issued 02/25/11 Approval Condition 5.1	F	Cyclones C4 and C5 shall be used whenever the associated equipment is in operation		<b>1M</b>
2.7.8	Order No. 10AQ-E389, Issued 02/25/11 Approval Condition 5.7, 5.8	F	Operation of equipment shall be conducted in a manner consistent with information included in NOC application and O&M Manual		<b>1M</b>
2.7.9	Order No. 10AQ-E389, Issued 02/25/11 Approval Condition 3.2	F	O&M Manual and Maintenance Records shall be readily accessible and available to Ecology upon request.		<b>1M</b>
2.7.10	Order No. 10AQ-E389, Issued 02/25/11 Approval Condition 5.6	F	Legible copies of the Order shall be available to employees in direct operation of cyclones and available for review upon request by Ecology		<b>1M</b>
2.7.11	Order No. 10AQ-E389, Issued 02/25/11 Approval Condition 5.4	F	Order No. 10AQ-E389 becomes void if operation is discontinued for 18 months		<b>1M</b>

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

[WAC 173-401-630(1), 03/15/16], [WAC 173-401-615(1)(a), (b), 03/15/16].

**GENERAL**

- 1M.** The permittee shall conduct the following general facility monitoring, recordkeeping and reporting.
- 1) On an ongoing basis, the permittee shall address and respond to all complaints received (written, via phone, in person, etc.) within three (3) working days of the complaint. The permittee shall retain records documenting each complaint, including; a direct record of the complaint, summary information on any associated deviation(s) per **condition 1.13.1**, and a discussion of any corrective action taken and results of such action. Ecology shall be notified of each complaint received within three (3) business days of the complaint.

**Conditions**

2.1.3                      2.1.4                      2.1.5                      2.1.6                      2.1.7                      2.1.8

- 2) On a monthly basis, the permittee shall perform walk-around surveys for the purpose of determining the presence of visible emissions throughout the facility site. The surveys shall be conducted while the facility is in operation and shall include observation for any visible emissions, including fugitive emissions, regardless of the source. The permittee shall retain records documenting each survey, including; date, time, employee name, weather at the time, an indication of whether any visible emissions were observed, a description of the cause of the visible emissions, the corrective action taken, and the results of such action.

**Conditions**

2.1.4                      2.1.5                      2.4.2                      2.5.2                      2.7.2                      2.7.5

- 3) The following actions shall be taken annually:
  - a) The permittee shall review actual facility operations to evaluate compliance with each permit requirement. The permittee shall retain records documenting each review, including; date, reviewer name, documents reviewed, permit conditions evaluated, summary information on any deviations identified, and date and time corrective actions were initiated and completed if appropriate.

**Conditions**

2.1.5	2.1.12	2.2.7	2.2.14	2.4.4	2.5.2	2.5.11	2.7.9
2.1.7	2.1.13	2.2.8	2.2.15	2.4.5	2.5.5	2.7.4	2.7.10
2.1.9	2.1.14	2.2.10	2.2.16	2.4.6	2.5.6	2.7.6	2.7.11
2.1.10	2.2.5	2.2.11	2.4.2	2.4.8	2.5.8	2.7.7	
2.1.11	2.2.6	2.2.12	2.4.3	2.4.9	2.5.10	2.7.8	

- b) During the first calendar year (or portion thereof) for which compliance is certified under this renewal AOP, the permittee shall perform a complete review of the O&M manuals, permit application materials (NOC, PSD, etc.), and all other relevant documents for the purpose of evaluating compliance with each permit condition referenced. The focus of this review shall be to verify that plant operations are being conducted in accordance with the documents listed above and with good air pollution control practices in mind at the time of the initial review. Subsequently, the permittee shall conduct annual reviews of plant operations to verify that any changes made since the initial review have not resulted in operations which are inconsistent with the documents cited above or with good air pollution control practices. The permittee shall retain records documenting each review, including; date, reviewer name, documents reviewed, permit conditions evaluated, summary information on any deviations identified, and date and time corrective actions were initiated and completed if appropriate.

**Conditions**

2.2.9	2.2.12	2.2.13	2.4.6	2.4.7	2.4.8	2.5.9	2.5.12
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- c) The pollutant emission rate or concentration shall be calculated based on appropriate monitoring data and emission factor(s). The emission factor used shall be determined based on the hierarchy included in **section 13.12** of the SOB. Calculations shall be adjusted for percent oxygen as required by the applicable requirement and shall indicate pollutant emission rate and concentration in the same units as the limit(s) specified in the applicable requirement(s). Each calculation shall be submitted to Ecology as part of the emission inventory, per **condition 1.13.4**. The submittal shall specify the value, units, and source of the emission factor that is being used, justify the emission factor chosen based on the SOB hierarchy, clearly identify all operating parameters used in the calculation method, and include an example calculation.

**Conditions**

2.2.3	2.2.4	2.7.3
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[WAC 173-401-615(1)(b), 03/15/16], [WAC 173-401-630(1), 03/15/16] [Order No. 04AQ-E115 1<sup>st</sup> Amendment, Issued 01/21/05, Approval Conditions 1.1, 4, 6.6, 7.2, 8.1, 8.2, 8.4, 8.5, 8.7]. This MRRR includes gapfilling.

**2M.** The permittee shall conduct monitoring in accordance with the following:

- 1) At least once per month the permittee shall perform surveys for the purpose of observing all emission units that are sources of potential visible and/or PM emissions to which standards apply facility-wide as well as those emission units and activities for which this MRRR is specified in the "MRRR Reference" column in the above tables. The survey shall also be conducted as necessary

when excess visible emission events are observed by facility personnel and reported to personnel responsible for environmental compliance. Facility personnel in general shall be made aware of their responsibility to report excess emission events. Insignificant emissions units are not subject to this MRRR requirement.

Each survey shall be performed as follows:

- a) The survey shall be conducted from a location with a clear view of the emission point and where the sun is as close as possible to being directly behind the observer. The observer's location shall be at least 15 feet but not more than  $\frac{1}{4}$  mile from the source.
  - b) The survey shall be conducted while the relevant emission unit as well as the associated facility process is in normal operation.
  - c) The observer will be educated in the general procedures for determining the presence of visible emissions (i.e. effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, observer position relative to source and sun, and the presence of uncombined water).
  - d) The survey shall consist of a minimum of four (4) consecutive visual observations of each stack, emission point, or property line to identify whether the emission point under observation exhibits visible emissions. The observer shall look away from the emission point under observation between each observation in order to rest their eyes.
  - e) The permittee shall develop a standard form to be used for the visible emissions surveys described above. A copy of the developed form shall be provided to Ecology.
- 2) Upon completion of the visual survey, the permittee's corrective actions shall be governed by the following:
- a) If visible emissions are observed to be zero, no corrective action is required.
  - b) If visible emissions are observed, the following actions shall be taken, as described below:
    - i) As soon as possible, but no later than 24 hours after visible emissions are observed, the permittee shall verify that all equipment which may affect emissions is performing its normal, designed function and being operated according to standard procedures. If any equipment is not performing as described, corrective action shall be initiated within 24 hours after the original observation of visible emissions. The corrective action taken shall return the equipment to normal operation as soon as possible and be designed to prevent the likely recurrence of the cause of the deviation.
      - a. If the corrective action taken results in a return to conditions under which visible emissions are not observable via the method outlined in **1)** above within the 24 hour window after visible emissions were originally observed, no further corrective action is required.
      - b. If, after corrective action is taken, visible emissions are still observed, or if the necessary corrective action requires a period of time beyond the 24 hour window, the permittee shall perform **ii)**:
    - ii) The permittee shall perform, or have performed, RM 9 on the source of the emissions. The RM 9 test shall be conducted only by personnel certified to perform RM 9 in accordance with EPA guidelines. The test shall occur as soon as possible, but no later than forty-eight (48) hours after the original observation of visible emissions.

- a. If the visible emissions as determined by RM 9 do not exceed the applicable standard, no further corrective action is required.
  - b. If a violation of any applicable opacity standard is documented, the permittee shall perform iii):
    - iii) If a violation of any applicable opacity standard is documented, appropriate and timely action shall be initiated (as soon as possible, but no later than 24 hours after discovery of the violation via RM 9 test) to identify and correct the problem causing the opacity. The corrective action taken shall return the equipment to normal operation and compliance with permit requirements as soon as possible and be designed to prevent the likely recurrence of the cause of the violation. Once corrective action has been taken to solve the problem, the permittee shall perform, or have performed, RM 9 on the source of emissions in order to demonstrate re-establishment of normal operation. Taking corrective action does not relieve the permittee from complying with the underlying condition, emission standard or work practice, nor does it relieve the permittee from the obligation to report any permit deviations as required in **condition 1.13.1**.
- 3) The permittee shall conduct recordkeeping in accordance with the following.
- a) The permittee shall maintain records of all RM 9 tests performed for a period of five (5) years. This recordkeeping requirement shall be satisfied by keeping the original RM 9 test form.
  - b) The permittee shall maintain a list of site personnel who have been educated as described in **1) c)** above, as well as a list of site personnel who are currently certified to perform RM 9.
  - c) Recordkeeping with regard to each deviation shall include the following:
    - i) Time, date, and duration of the deviation,
    - ii) Cause of the deviation,
    - iii) Estimate of excess emissions and magnitude of deviation, and
    - iv) Corrective action taken, and the results of such action.
- 4) The permittee shall conduct reporting in accordance with the following.
- a) Copies of all RM 9 test forms which either document a deviation or re-establishment of normal operation following a deviation shall be submitted to Ecology as part of the monthly deviation reports as required by **condition 1.13.1**. In addition to the RM 9 form, reporting shall also include copies of the visible emission observation form(s) as well as the information required under recordkeeping under **3) c)** above. The permittee is not required to submit RM 9 forms for tests conducted under **2) b) ii)** above, which do not document a deviation or violation.
- [WAC 173-401-615(1)(b), & (3), 03/15/16], [WAC 173-401-630(1), 03/15/16]. This MRRR includes gapfilling.

## HOG FUEL BOILER

- 3M.** Periodic performance testing shall be conducted every five (5) years. The five (5) year cycle shall be measured from the most recent source testing. The following conditions shall apply to all testing:
- 1) Particulate matter shall be reported for fronthalf (RM 5) and backhalf (RM 202). Particulate matter emissions shall be reported in grains per dry standard cubic foot of exhaust gas (gr/dscf) as well as pounds per hour (lb/hr).

- 2) Testing shall be conducted for all pollutants of concern as determined by Ecology. The appropriate EPA reference method shall be used for testing of each pollutant. Pollutant emission rates for NO<sub>x</sub>, SO<sub>2</sub>, CO, and HC/VOC shall be reported in terms consistent with the applicable requirement or as specified by Ecology.
- 3) The testing shall consist of at least three (3) runs. One run shall include grate cleaning and two runs shall reflect normal boiler operations. The results from these three runs will be used to calculate a time weighted average emission rate for comparison with the emission limit in **condition 2.2.2** of this AOP.
- 4) If possible, testing shall occur with the boiler operating at a minimum of ninety (90) percent of the boiler maximum steam production rate. The maximum allowable steam production rate per **condition 2.2.5** shall be determined based on each test using the following method. The maximum steam rate shall be obtained by determining the average steam production rate during the test and dividing this number by 0.90. This maximum steam rate shall apply until another emission test is conducted.
- 5) The boiler shall be operated and controlled by the normal shift boiler operator during testing. Any person other than the boiler operator or other appropriate facility personnel, including any consultant, boiler representative or tester, directing the operation of the boiler in any way during the testing period will immediately invalidate the testing for the purposes of Ecology's evaluation. No controls or monitors other than those permanently installed and utilized during the normal course of operation will be used to direct the operation of the boiler during the testing period.
- 6) During testing, boiler, multiclone, and ESP operating parameters shall be recorded on fifteen (15) minute intervals. Data collected shall be submitted as part of the test report. The parameters recorded shall at a minimum include boiler steam production rate (lb/hr), multiclone pressure drop (in. w.c.), ESP inlet and outlet temperature (°F or °C), ESP primary and secondary voltage and current for each T/R set (kV and mA), and ESP spark rate (sparks/time period).
- 7) During testing, opacity shall be measured at least once during each test run by certified personnel using EPA method 9. Separate RM 9 forms shall be completed for each test run, and copies shall be included in the test report.
- 8) An independent testing firm shall conduct the testing and shall submit a test plan for Ecology approval at least thirty (30) days prior to the source testing.
- 9) The permittee shall notify Ecology of the date of the source testing at least thirty (30) days prior to the date of testing. The permittee shall notify Ecology as soon as possible if any planned source testing is cancelled or rescheduled.
- 10) The test report shall be sent to Ecology within sixty (60) days after the testing.
- 11) Alternate methods of testing and alternate testing requirements may be proposed by the permittee in writing to Ecology. Permission for use of alternate forms of testing must be approved in writing by Ecology.

[WAC 173-401-615(1)(a), & (2) , 03/15/16], [WAC 173-401-630(1), 03/15/16], [Order No. 04AQ-E115 1<sup>st</sup> Amendment, Issued 01/21/05, Approval Conditions 1.2, 3.1, 3.2, 3.2.1, 3.2.2, 3.2.3, 3.2.4, 3.2.5, 3.2.5.1, 3.2.5.2, 3.2.5.3, 3.2.5.4, 3.2.5.5, 3.2.6, 3.2.8, 3.2.9] This MRRR includes gapfilling.

- 4M.** The following conditions shall apply to the monitoring, recordkeeping, and reporting required for the hog fuel boiler:

- 1) Monitoring shall be conducted as specified by the following conditions. All equipment shall be maintained in good operating condition. Monitors shall include display of the monitored parameter in an easily accessible location. Each display shall be labeled as to the parameter measured and the units of measurement.
  - a) The following parameters shall be monitored:
    - i) Multiclone differential pressure in inches of water column (in. w.c.).
    - ii) Boiler steam production rate in pounds per hour (lbs/hr).
    - iii) ESP inlet and outlet temperature in degrees Fahrenheit or Celsius (°F, °C).
    - iv) ESP primary and secondary voltage and current on each of the two Transformer/Rectifier (T/R) sets in kilovolts (kV) and milliamps (mA). The voltage and current shall be read at the highest stable value.
    - v) ESP spark rate in sparks per time period.
  - b) A Continuous Opacity Monitoring System (COMS) which meets the approval requirements of 40 CFR 60, Appendix B, "Performance Specification 1 (PS-1)", is installed and shall be maintained and operated at all times of boiler operation. The COMS shall be operated using quality assurance procedures conforming to *EPA 340/1-86-010, Recommended Quality Assurance Procedures of Opacity CEMS*. Display of opacity data from the COMS shall include the instantaneous and current six (6) minute block average opacity. The permittee shall have a Quality Assurance (QA) Plan for the COMS outlining the quality assurance procedures to be used for the installed COMS. The QA Plan shall specify the frequency at which each quality assurance procedure will be performed. Alternative monitoring required in the event of COMS failure shall be performance of the visible emission monitoring described in **2M** at least once per day that the boiler is operated.
- 2) The following recordkeeping specific to the hog fuel boiler shall be retained for a period of five (5) years and kept in an organized, legible manner readily available for inspection by Ecology personnel:
  - a) The following parameters, recorded at least once every eight (8) hour shift; boiler steam production rate (lbs/hr), multiclone pressure drop (in. w.c.), ESP inlet and outlet temperature (°F or °C), ESP primary and secondary voltage and current on each T/R set (kV and mA), and ESP spark rate (sparks/time period).
  - b) Opacity data recordkeeping from the COMS shall at a minimum include a chart recorder and records of each six (6) minute block average opacity.
  - c) Steam production records.
  - d) Boiler hours of operation.
  - e) A log shall be maintained to record operating problems and maintenance performed on the air pollution control and monitoring equipment.
  - f) Regular maintenance records for the boiler and associated equipment.
  - g) Records of all maintenance and repair activities performed on the ESP.
  - h) An updated copy of the COMS QA Plan.
  - i) Records of all quality assurance procedures performed over the most recent five (5) years.
  - j) Copies of all reports from emission testing conducted on the boiler, whether or not the testing was required by Ecology, including copies of all RM 9 visible emissions tests conducted.

- 3) Reporting specific to the hog fuel boiler shall be conducted in accordance with the following:
  - a) Annual reporting shall include total annual steam production (lbs), total annual hours of boiler operation, and peak steam production rate recorded (lbs/hr, daily average). This information may be submitted as part of the annual emission inventory, per **condition 1.13.4**.
  - b) Prompt reporting of deviations as required under **condition 1.13.1**.
  - c) Any modification to the ESP or its operating procedures, contrary to information in the NOC application, shall be reported at least sixty (60) days prior to such modification.

[Order No. DE 78-496 Third Amendment, Issued 01/21/05, Approval Condition 1] [WAC 173-401-630(1), 03/15/16], [Order No. 04AQ-E115 1<sup>st</sup> Amendment, Issued 01/21/05, Approval Conditions 1.3, 1.4, 1.5, 2.2, 6, 6.1, 6.1.1, 6.1.2, 6.1.3, 6.1.4, 6.1.5, 6.2, 6.3, 6.4, 6.5, 7.1, 7.4, 8.6]. This MRRR includes gapfilling.

**5M.** The following shall function as Compliance Assurance Monitoring for the hog fuel boiler.

- 1) The permittee shall conduct monitoring in accordance with the following:
  - a) Equipment shall be provided that monitors and displays electrostatic precipitator secondary voltage (kV) for both transformer/rectifier sets (T/R 1 and T/R 2) as well as differential pressure (in. w.c.) across the multiclone.
  - b) At least once per day, the permittee shall evaluate the data obtained through recordkeeping as described in **2) a)** and **2) b)** below, answer the following questions and take the actions specified:
    - i) Has the daily average ESP secondary voltage been below either of the following trigger limits for two (2) consecutive days?
      - a. For T/R 1, the trigger limit shall be 20 kV.
      - b. For T/R 2, the trigger limit shall be 30 kV.
    - ii) Is the two-day average multiclone differential pressure outside the range 0.5" – 4.0" w.c.?
  - c) If the answer to both of the questions posed under **1) b)** above is "no", corrective action is not required under CAM.
  - d) If the answer to the question posed by **1) b) i)** above is "yes", the permittee shall as soon as possible, but in no case later than four (4) hours after discovery of the deviation, initiate corrective actions designed to return the air pollution control equipment to normal operation and to prevent the likely recurrence of the cause of the deviation. A list of corrective actions to be considered shall be included in the O&M manual and shall include system shutdown followed by inspection and repair.
  - e) If the answer to the question posed by **1) b) ii)** above is "yes", actions consistent with the following shall be taken.
    - i) The multiclone shall be internally inspected during the next scheduled plant shutdown, and corrective actions shall be taken as necessary to return the equipment to normal operation.
- 2) The permittee shall conduct recordkeeping in accordance with the following:
  - a) At least once every eight (8) hours, the permittee shall record the values for ESP secondary voltage for both T/R 1 and T/R 2 and multiclone differential pressure as displayed on the equipment provided. In recording ESP secondary voltage, the highest stable value observed

- over a short time period should be recorded. The purpose of this is to avoid recording the voltage immediately after the ESP sparks.
- b) At least once per day, the daily average of the secondary voltage for each of the T/R sets and the differential pressure across the multiclone shall be calculated by computing the mean of the three (3) recorded values.
  - c) In the event that actions as outlined in either **1) d)** or **1) e)** are required, the permittee shall maintain records documenting the action taken, and the results of such action. The records shall be retained in a well-organized manner and easily accessible for inspection by Ecology personnel.
- 3) The permittee shall conduct reporting in accordance with the following:
- a) In the event that corrective action as outlined under **1) d)** above is required, the permittee shall submit a report as part of, or attached to, the monthly deviation report as described in **condition 1.13.1**. In the event that corrective action as outlined under **1) e)** is required, the permittee shall notify Ecology within the next monthly deviation report of the next expected plant shutdown date, and shall submit a report following shutdown outlining the corrective actions taken regarding multiclone differential pressure.
  - b) Upon discovery that the monitoring as designed is insufficient to provide indications of all deviations, the permittee shall notify Ecology of the monitoring deficiency within the next semi-annual monitoring report.
- 4) Monitoring, recordkeeping and reporting as required under CAM shall be subject to the following general conditions:
- a) The owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emission unit is operating, with the following qualifications:
    - i) Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of CAM, including data averages and calculations, or fulfilling a minimum data availability requirement.
    - ii) The owner or operator shall use all data collected during all other periods in assessing the operation of the control device and associated control system.
    - iii) "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.
  - b) Semi-annual CAM monitoring reports shall include the following:
    - i) Summary information on the number, duration, and cause (including unknown cause, if applicable) of deviations or violations, 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), and
    - iii) A description of any actions taken during the reporting period to implement any QIP's in effect.
  - c) The following conditions shall apply to all CAM recordkeeping:
    - i) The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan(s) required as well as any

activities undertaken to implement a quality improvement plan, and any other supporting information required to be maintained under CAM (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

- 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 64.3, §64.4(d), §64.7(a), (b), (c), (d), (e), §64.8, §64.9(a), (b), 07/01/02]

**6M.** Hogged Fuel Boiler tune-ups shall be conducted on at least a biennial basis. Subsequent biennial tune-ups shall be conducted no more than 25 months after the previous tune-up. The last reported tune-up of the Hogged Fuel Boiler was February 10, 2016. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup. Tune-up shall be conducted per 40 CFR 63.11223(b).

- 1) The Permittee shall prepare, by March 1, of each biennial period and maintain onsite, (and submit if requested by Ecology or EPA), a biennial tuning and compliance certification report containing:
  - a) Company name and address
  - b) Statement by the responsible official, with official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart.
  - c) The report must include the following certification(s) of compliance, as applicable, and be signed by the responsible official.
    - o "This facility complies with the requirements in §63.11223 to conduct a biennial tune-up."
    - o "No secondary materials that are solid waste were combusted in the affected unit."
  - f) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
  - g) A description of any corrective actions taken as part of the tune-up of the boiler.
  - h) The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period.
- 2) The permittee shall also maintain:
  - a) Tune-up records identifying each boiler, the date of tune-up, the procedures followed for tune-up, and the manufactured specifications to which the boiler was tuned.
  - b) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.
  - c) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in 40 CFR §63.11205(a), including corrective actions to restore malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.

[40 CFR §63.11210(i)(1); §63.11201(b); §63.11223(a); §63.11223 (b); §63.11225(b); §63.11225(c); §63.11214(b), 07/01/15]

- 7M.** The permittee shall create, follow, and maintain a site-specific O&M manual for the ESP. The O&M manual shall be maintained in an up-to-date manner, well organized, and easily accessible for inspection by Ecology personnel. The manual for the ESP shall be completed within one hundred eighty (180) days after startup of the boiler following installation of the ESP. Manufacturer's instructions may be referenced. Emissions that result from failure to follow the requirements of the O&M manual or manufacturer's instructions may be considered proof that the equipment was not properly operated and maintained. The O&M manual shall at a minimum include:
- 1) A list and description of all operating parameters which are monitored on the ESP. The manual shall include an acceptable operating range for each parameter. This acceptable range shall be based on manufacturer recommendations and site specific source testing results. The O&M manual shall include baseline values for each operating parameter as collected during the initial, and each subsequent emission test.
  - 2) A description of the purpose, function and location of each instrument utilized to measure the ESP operating parameters.
  - 3) A schedule of the maintenance activities to be performed on the ESP.
  - 4) A general process flow diagram of the boiler and associated emission control system. The diagram should include the following minimum information: boiler, multiclone, pre-heater, ESP, COMS, fans, temperature and pressure gauges.

[WAC 173-401-615(1)(b), (c), 03/15/16], [Order No. 04AQ-E115 1<sup>st</sup> Amendment, Issued 01/21/05, Approval Conditions 4, 4.1, 4.2, 4.3, 4.4, 8.5]. This MRRR includes gapfilling.

## LUMBER DRYING KILNS

- 8M.** The following conditions shall apply to the recordkeeping and reporting required for the lumber drying kilns:
- 1) Lumber drying kilns records shall be retained including the following information. The information shall be retained for five (5) years and kept in a legible and readily accessible manner for inspection by Ecology personnel in accordance with **condition 1.6** Inspection and Entry.
    - a) Dry kiln production records (overall total board feet).
    - b) Dry kiln production by tree species.
    - c) Organized O&M instructions and maintenance records.
  - 2) Reporting specific to the lumber drying kilns shall be conducted in accordance with the following.
    - a) Annual total dry kiln production and production speciation shall be submitted. This information may be submitted as part of the annual emission inventory, per **condition 1.13.4**.

[Order No. DE 94AQ-E169 Second Amendment, Issued 05/17/96, Approval Conditions 1 and 4], [WAC 173-401-630(1), 03/15/16]. This MRRR includes gapfilling.

- 9M.** The permittee shall maintain and follow an O&M manual for dry kiln #6. The O&M manual shall be maintained in an up-to-date manner, well organized, and easily accessible for inspection by Ecology personnel. Emissions that result from failure to follow the requirements of the O&M manuals or manufacturer's instructions may be considered proof that the equipment was not properly operated, maintained, and tested. The following minimum information shall be included in the manual:

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

[Order No. DE 94AQ-E169 Second Amendment, Issued 05/17/96, Approval Condition 4]

## PLANER BAGHOUSE

**10M.** The following conditions shall apply to the monitoring, recordkeeping and reporting required for the planer baghouse:

- 1) Baghouse monitoring shall include the following:
  - a) Pressure gages/sensors that indicate the pressure at the baghouse inlet as well as the baghouse outlet.
  - b) A pressure gage on the reverse air cleaning mechanism.
  - c) On an annual basis, the total weight of material collected by planer #1 shaving and dust collection system shall be calculated using the following method. The total annual planer shavings (Bone Dry Tons) shall be multiplied by the factor Planer #1 production/Total planer production. This number will represent the material collected by baghouse #1 and cyclone #1.
- 2) Baghouse records shall be retained including the following information. The information shall be retained for five (5) years and kept in a legible and readily accessible manner for inspection by Ecology personnel in accordance with **condition 1.6** Inspection and Entry.
  - a) Total planer throughput (board feet).
  - b) Planer #1 throughput (board feet).
  - c) Total annual planer shavings (Bone Dry Tons).
  - d) Regular maintenance records.
- 3) Reporting specific to the baghouse shall be conducted in accordance with the following.
  - a) Total weight of material collected by baghouse #1 and cyclone #1 as calculated under 1), c) above shall be submitted annually. This information may be submitted as part of the annual emission inventory, per **condition 1.13.4**.
  - b) Any deviations shall be reported to Ecology within the next working day and shall be summarized within each semi-annual monitoring report, per **condition 1.13.2**.

[Order No. DE 93AQ-E111, Issued 03/19/93, Approval Conditions 3, 5, 6], [WAC 173-401-615(1)(b), 03/15/16], [WAC 173-401-630(1), 03/15/16] This MRRR includes gaffilling.

**11M.** The permittee shall maintain and follow an O&M manual for the planer baghouse. The O&M manual shall be maintained in an up-to-date manner, well organized, and easily accessible for inspection by Ecology personnel. Emissions that result from failure to follow the requirements of the O&M manuals or manufacturers' instructions may be considered proof that the equipment was not properly operated, maintained, and tested. Maintenance shall be scheduled around normal operations. The following minimum information shall be included in the manual:

- 1) Normal operating parameters for the baghouse,
- 2) A maintenance schedule for the baghouse,

- 3) Monitoring and recordkeeping requirements for the baghouse,
- 4) A description of all monitoring procedures and instrumentation for the baghouse.

[Order No. DE 93AQ-E111, Issued 03/19/93, Approval Condition 3, 6, 6.1, 6.2, 6.3, 6.4, and 6.5], [WAC 173-401-630(1), 03/15/16]. This MRRR includes gapfilling.

#### 4. Inapplicable Requirements

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Ecology has determined that the entire source, including all emission units, is not subject to the following requirements at the time of permit issuance. Some of the requirements listed below may become applicable during the permit term due to an invoking event, even though the requirement is deemed inapplicable at the time of permit issuance. Such requirements shall therefore be met on a timely basis by the permittee through submittal of a compliance schedule, per WAC 173-401-510(2)(h)(ii)(B) 03/15/16.

Inapplicable Requirement	Requirement Description	Explanation
40 CFR 61	National Emission Standards for Hazardous Air Pollutants	The facility is not a stationary source for which a standard is prescribed
40 CFR 63, Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process heaters.	The permittee does not operate a major source of hazardous air pollutants.
40 CFR 68	Chemical Accident Prevention Provisions	The facility does not have more than the threshold quantity of any regulated substance.