WASHINGTON STATE DEPARTMENT OF ECOLOGY
CENTRAL REGIONAL OFFICE
15 W YAKIMA, SUITE 200
YAKIMA, WASHINGTON 98902

IN THE MATTER OF THE COMPLIANCE BY SDS LUMBER COMPANY with Section 70.94.161 RCW, Operating Permits for Air Contaminant Sources, and the applicable rules and regulations of the Department of Ecology	)))))	AIR OPERATING PERMIT No. 13AQ-C181 **DRAFT** PERMIT

To: Jason Spadaro, President
SDS Lumber Company
PO Box 266
Bingen, Washington 98605

Issuance Date:	DRAFT
Effective Date:	October 22, 2013
Expiration Date:	October 22, 2018

Responsible Official: Jason Spadaro, President

Source Location: Walnut and Steuben Street, Bingen, Klickitat County, Washington

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

Hereinafter, SDS Lumber Company is called the permittee. The permittee is required to comply with the provisions contained within this permit.

This DRAFT permit renewal, per WAC 173-401-710(1), is DATED this 25 day of JUNE, 2013.

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LIST OF ABBREVIATIONS

CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
DESP	Dry Electrostatic Precipitator
Ecology	Washington State Department of Ecology
EFSEC	Energy Facility Site Evaluation Council
EPA	United States Environmental Protection Agency
ESP	Electrostatic Precipitator
F	Federally Enforceable
FCAA	Federal Clean Air Act
FIPS	Federal Information Procedures System
GHG	Green House Gas
gr/dscf	Grain per Dry Standard Cubic Foot
HAP	Hazardous Air Pollutant
ISO	International Organization for Standardization
kV	Kilovolt
lb/hr	Pounds per Hour
mA	Milli ampheres
MACT	Maximum Achievable Control Technology
MMBtu/hr	One million British Thermal Units per hour
MVAC	Motor Vehicle Air Conditioner
NOC	Notice of Construction
NOV	Notice of Violation
NO_X	Oxides of Nitrogen
O_2	Oxygen
O&M	Operation & Maintenance
PCHB	Pollution Control Hearings Board
PM	Particulate Matter
PM_{10}	Particulate matter with aerodynamic diameter $\leq$ 10 micrometers
$PM_{2.5}$	Particulate matter with aerodynamic diameter $\leq$ 2.5 micrometers
ppm_v	Parts per Million by Volume
PSD	Prevention of Significant Deterioration
QIP	Quality Improvement Plan
RACT	Reasonably Available Control Technology
RCW	Revised Code of Washington
RM	Reference Method
S	State Only Enforceable
SCC	Source Classification Code
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
tpy	Tons per Year
TSP	Total suspended particulate
VOC	Volatile Organic Compound
WAC	Washington Administrative Code
WESP	Wet Electrostatic Precipitator

AIR OPERATING PERMIT CONDITIONS

1.0 EMISSION UNIT IDENTIFICATION

The requirements identified in this permit apply to all air emissions from SDS Lumber Company located at Walnut and Steuben Street in Bingen, Washington. Specific requirements for processes of the source are listed in Section 6 of this permit. Selected permitted emission processes are listed in the table below; a full list of significant emission units can be found in Table 2 of the Statement of Basis.

Source Description (Name, Permit Section)	Emission Points	Control Device[a] (Name, Permit Section)	Process Description
Hog Fuel Boiler (a.k.a. Process #2, see Table 6.2)	1 Stack	1 Dry Electrostatic Precipitator (DESP) (a.k.a. Process #2, see Table 6.2)	80,000 lb/hr boiler for steam production; steam used for process heating and to produce power. The boiler is fueled by bark, wood waste, sander dust, and shavings; natural gas is used for startup and shutdown.
2 Veneer Dryers (a.k.a. Process #3, see Table 6.3)	1 Stack	1 Wet Electrostatic Precipitator (WESP) (a.k.a. Process #3, see Table 6.3)	Dryers, heated by steam produced by the hog fuel boiler, used in the production of plywood.
Plywood Sanding (a.k.a. Process #4, see Table 6.4)	4 Stacks	3 Cyclones in series with 4 Baghouses (a.k.a. Process #4, see Table 6.4)	Final sanding of dry, trimmed, and filled plywood sheets.
Materials Handling and Storage (a.k.a. Process #5, see Table 6.5)	Source Wide	Wind screens for the storage pile. (a.k.a. Process #9, see Table 6.9)	Chips and sawdust are conveyed, from various locations within the source, to a partially enclosed storage area by pneumatic, belt, and bucket conveyors.
New Stud Mill (a.k.a. Process #6, see Table 6.6)		1 Baghouse (a.k.a. Process #6, see Table 6.6)	The stud mill processes logs into dimensional sizes such as 2x4s, 4x4s and 4x6s. Lumber produced in the stud mill is typically dried in one of two dry kilns.
Stud Mill Kiln #2 (a.k.a. Process #7, see Table 6.7)			Lumber produced in the stud mills may be dried in this kiln. The kiln is heated with steam from the hog fuel boiler.
Debarker (a.k.a. Process #8, see Table 6.8)			Bark is removed from logs to prepare the logs for further processing.
Logyard (a.k.a. Process #9, see Table 6.9)	Logyard Area		Storage of logs prior to processing.
V-Drum Chipper (Process #1, see Table 6.1)		Cyclone (Process #1, see Table 6.1)	Chipped logs are processed in a v-drum chipper. Chips and sawdust are conveyed to the chip and sawdust piles through a combination of pneumatic, belt, and bucket conveyors, where they are stored in piles that are partially surrounded by wind screens.
Truck Sawdust Unload Discharge #3 (Process #1, see Table 6.1)		Cyclone (Process #1, see Table 6.1)	Wood chips are pneumatically removed from haul trucks and discharged to the chip piles.

[a]Does not include control devices classified as insignificant emission units or inherent process equipment.

2.0 PERMIT PROVISOS

2.1 Permit shield.

2.1.1 Compliance with the conditions of this permit shall be deemed compliance with those applicable requirements that are specifically included in and identified in the permit as of the date of permit issuance. [WAC 173-401-640(1), 8/10/11]

2.1.2 The permit shield shall not apply to any insignificant emissions unit or activity designated under WAC 173-401-530(3). [WAC 173-401-530, 8/10/11]

2.2 Severability.

If 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), 8/10/11; RCW 70.94.905, 12/27/12 (S)]

2.3 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege. [WAC 173-401-620(2)(d), 8/10/11]

2.4 Transfer of Ownership or Operation

A change in ownership or operational control of this source is treated as an administrative permit amendment if 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. [WAC 173-401-720(1)(d), 8/10/11]

2.5 Emissions Trading

No permit revision shall be required, under any approved economic incentives, marketable permits, emission trading, and other similar programs or processes for changes that are provided for in this permit. [WAC 173-401-620(2)(g), 8/10/11]

2.6 Enforceability

All terms and conditions of the permit are enforceable by the EPA and citizens unless specifically designated as state (S) enforceable. [WAC 173-401-625, 8/10/11]

2.7 General Obligation

Exclusions. Nothing in this permit shall alter or affect the following:

2.7.1 The provisions of Section 303 of the FCAA (emergency orders), including the authority of the administrator under that section.

2.7.2 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.

2.7.3 The applicable requirements of the acid rain program, consistent with Section 408(a) of the FCAA.

2.7.4 The ability of EPA to obtain information from a source pursuant to Section 114 of the FCAA.

2.7.5 The ability of Ecology to establish or revise requirements for the use of RACT as provided in Chapter 252, Laws of 1993.

[WAC 173-401-640(4), 8/10/11]

2.8 Reasonably Available Control Technology

Emission standards and other requirements contained in rules or regulatory orders in effect at the time of operating permit issuance or renewal shall be considered RACT for purpose of permit issuance or renewal. This does not preclude RACT determinations under Section 8, Chapter 252, Laws of 1993, which shall be incorporated into an operating permit as provided in WAC 173-401-730. [WAC 400-070(2)(b), 11/28/12 (S); WAC 173-401-605(3), 8/10/11; RCW 70.94.154, 12/27/12 (S)]

2.9 **Need to Halt or Reduce Activity not a Defense**
It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [WAC 173-401-620(2)(b), 8/10/11]

2.10 **Permit Actions**
This 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 reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [WAC 173-401-620(2)(c), 8/10/11]

2.11 **Permit Continuation**
This permit and all terms and conditions contained therein, including any permit shield provided under WAC 173-401-640, shall not expire until the renewal permit has been issued or denied if a timely and complete renewal application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect until the renewal permit has been issued or denied if a timely and complete renewal application has been submitted. [WAC 173-401-620(2)(j), 8/10/11]

2.12 **Permit Appeals**
You have a right to appeal this permit to the Pollution Control Hearing Board (PCHB) within 30 days of the date of receipt of this permit. 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 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 actual 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 Chapter 43.21B RCW and Chapter 371-08 WAC.

Address and Location Information:

Street Addresses	**Mailing Addresses**
Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503	Department of Ecology Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608
Pollution Control Hearings Board 1111 Israel RD SW STE 301 Tumwater, WA 98501	Pollution Control Hearings Board PO Box 40903 Olympia, WA 98504-0903

This provision for appeal in this section is separate from and additional to any federal rights to petition and review under Section 505(b) of the FCAA. [WAC 173-401-620(2)(i), 8/10/11; RCW 70.94.221, 12/27/12 (S)]

3.0 PERMIT ADMINISTRATION

3.1 **Duty to Comply**

3.1.1 The permittee must comply with all conditions of this WAC 173-401 permit.

3.1.2 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 reissuance, or modification; or for denial of a permit renewal application.

[WAC 173-401-620(2)(a), 8/10/11]

3.2 **Inspection and Entry**

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

3.2.1 Enter upon the permittee's premises where a Chapter 173-401 WAC source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

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

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

3.2.4 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.

[WAC 173-401-630(2), 8/10/11; RCW 70.94.200, 12/27/12 (S)]

3.2.4.1 Ecology may require the permittee to conduct stack and/or ambient air monitoring and report the results to Ecology. [WAC 173-400-105(2), 8/20/93, 11/28/12 (S)]

3.2.4.2 Ecology may conduct or require that a test be conducted using approved EPA methods from 40 CFR 60 Appendix A or approved procedures contained in "Source Test Manual - Procedures for Compliance Testing," Ecology, 7/12/90. The permittee may be required to provide platform and sampling ports. Ecology shall be allowed to obtain a sample from any emissions unit. The permittee shall be given the opportunity to observe the sampling and to obtain a sample at the same time. [WAC 173-400-105(4), 8/20/93, 11/28/12 (S)]

3.2.5 Ecology may conduct source tests and require access to records, books, files, and other information specific to the control, recovery, or release of pollutants regulated under 40 CFR Part 61. [WAC 173-400-075(2), 11/28/12 (S)]

3.2.6 No person shall obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties. [RCW 70.94.200, 12/27/12 (S)]

3.3 **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 permit if the permit fees are not paid per WAC 173-401-930(3). [WAC 173-401-620(2)(f), 8/10/11; RCW 70.94.162(1), 12/27/12; WAC 173-401-930(3), 8/10/11]

3.4 **Duty to Provide Information**

The permittee shall furnish to Ecology, within a reasonable time, any information that Ecology may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to Ecology copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70.94.205. [WAC 173-401-620(2)(e), 8/10/11]

3.5 **Recordkeeping**

3.5.1 Permittee shall keep records of required monitoring information that includes, where applicable, the following:

3.5.1.1 The date, place, and time of sampling or measurements.

3.5.1.2 The date(s) analyses were performed.

3.5.1.3 The company or entity that performed the analyses.

3.5.1.4 The analytical techniques or methods used.

3.5.1.5 The results of such analyses.

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

[WAC 173-401-615(2)(a), 8/10/11]

3.5.2 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), 8/10/11]

3.5.3 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), 8/10/11]

3.6 **Reporting**

3.6.1 Permittee shall submit reports of any required monitoring (i.e., Monitoring Recordkeeping and Reporting column of Section 5) at least once every six (6) months. At a minimum, reports for January 1st through June 30th and July 1st through December 31st, shall be due **September 1st** and **March 1st**, respectively. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with WAC 173-401-520. [WAC 173-401-615(3)(a), 8/10/11]

3.6.2 Permittee shall report deviations from permit requirements, including those attributable to upset conditions, the probable cause of such deviations, and any corrective actions or preventative measures taken. Such deviations shall be reported '**promptly**'. For deviations which represent a potential threat to human health or safety, 'promptly' means as soon as possible, but in no case later than twelve (12) hours after the deviation is discovered. The source shall maintain a contemporaneous record of all deviations. Other deviations shall be reported no later than **thirty (30) days** after the end of the month during which the deviation is discovered. Copies of reports shall be sent to Ecology at:

Air Quality Section Manager
Department of Ecology
15 West Yakima Avenue, Suite 200
Yakima, Washington 98902

[WAC 173-401-615(3)(b), 8/10/11; 40 CFR part 64.9(a), 7/1/12]

3.7 **Excess Emissions**

3.7.1 Excess emissions due to emergency. The permittee may seek to establish that noncompliance with a technology-based emission limitation under this permit was due to an emergency. To do so, the permittee shall demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that:

3.7.1.1 An emergency occurred and that the permittee can identify the cause(s) of the emergency.

3.7.1.2 The permitted source was at the time being properly operated.

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

3.7.1.4 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 or shorter periods of time specified in an applicable requirement. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

[WAC 173-401-645, 8/10/11]

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

3.7.2.1 The permittee shall have the burden of proving to Ecology that excess emissions were unavoidable. This demonstration shall be a condition to obtaining relief under 3.7.2.2, 3.7.2.3, or 3.7.2.4.

3.7.2.2 Excess emission due to startup or shutdown conditions shall be considered unavoidable provided the source reports as required under WAC 173-400-107(3) 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.

3.7.2.3 Excess emission due to scheduled maintenance shall be considered unavoidable if the source reports as required under WAC 173-400-107(3) 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.

3.7.2.4 Excess emissions due to upsets shall be considered unavoidable provided the source reports as required under WAC 173-400-107(3) and adequately demonstrates that:

3.7.2.4.1 The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition;

3.7.2.4.2 The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance; and

3.7.2.4.3 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.

3.7.2.5 Required reporting. Excess emissions which represent a potential threat to human health or safety or which the owner or operator of the source believes to be unavoidable shall be reported to Ecology **as soon as possible**. Other excess emissions shall be reported within **thirty (30) days** after the end of the month during which the event occurred or as part of the routine emission monitoring reports. Upon request by Ecology, the permittee shall submit a full written report including the known causes, the corrective actions taken, and the preventative measures to be taken to minimize or eliminate the chance of recurrence.

[WAC 173-400-107(3), 8/20/93, 11/28/12 (S)]

3.8 Submittals

3.8.1 Reports, test data, monitoring data, and notifications, required by this permit, and requests for permit renewal shall be submitted to Ecology at:

Air Quality Section Manager
Department of Ecology
15 West Yakima Avenue, Suite 200
Yakima, Washington 98902

[WAC 173-401-615(3)(a), 8/10/11]

3.8.2 Any application form, report, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. 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. [WAC 173-401-520, 8/10/11]

3.9 **Emission Inventory**

Permittee shall submit an inventory of emissions from the source for each calendar year. The inventory shall include segmented stack and fugitive emissions of TSP, PM_{10}, $PM_{2.5}$, SO_2, NO_X, CO, total reduced sulfur compounds, fluorides, lead, VOCs, ammonia, and other contaminants. The inventory shall be submitted for each calendar year, no later than **April 15th** of the following year.

Additionally, the inventory for calendar years 2014 and 2017, shall specify inventory year, inventory start date, inventory end date, contact name, contact phone number, Federal Information Processing Standards (FIPS) code, facility ID codes, unit ID code, process ID code, stack ID code, site name, physical address, SCC, fuel heat content (annual average), fuel heat content (ozone season, if applicable), fuel ash content (annual average), fuel sulfur content (annual average), pollutant code, activity/throughput (for each period reported), summer day emissions, ozone season emissions (if applicable), annual emissions, emission factor, winter throughput (%), spring throughput (%), summer throughput (%), fall throughput (%), hr/day in operation, day/week in operation, week/year in operation, stack latitude, stack longitude, method accuracy description codes, stack height, stack diameter, exit gas temperature, exit gas velocity, exit gas flow rate, North American Industry Classification System code at the Facility level, design capacity (including boiler capacity if applicable), maximum generator nameplate Capacity, primary capture and control efficiencies (%), total capture and control efficiency (%), control device type, emission type, emission release point type, rule effectiveness (%), winter work weekday emissions of CO (if applicable) as defined in Title 40 CFR Part 51 Subpart A Appendix A , 7/1/12.

The source shall maintain records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards. Emission inventories shall be entered digitally to the Ecology's Washington Emissions Inventory Repository Database. A signed certification, stating that the inventory has been entered into the database, shall be sent to:

Air Quality Section Manager
Department of Ecology
15 West Yakima Avenue, Suite 200
Yakima, Washington 98902

[WAC 173-400-105(1), 8/20/93, 11/28/12 (S)]

3.10 **Reporting of Emissions of Greenhouse Gases**

If the permittee emits 10,000 metric tons of GHGs or more per calendar year, as defined under WAC 173-441-020(1)(g), reporting of GHG to Ecology is mandatory. (Note: WAC 173-441-030(5) details reporting requirements for facilities which historically exceed the threshold, but currently have lower carbon dioxide equivalent emissions.)

Permittee shall develop a written GHG monitoring plan in accordance with WAC 173-441-050(6)(e). The permittee shall revise the GHG monitoring plan as needed to reflect changes in processes, monitoring instrumentation, and quality assurance procedures; or to improve procedures for the maintenance and repair of monitoring systems to reduce the frequency of monitoring equipment downtime.
[WAC 173-441-050(6), 12/1/10 (S)]

Reports must meet the requirements of WAC 173-441-050, and include the annual emissions of the GHGs listed in WAC 173-441-040 from source categories listed in WAC 173-441-120. The annual GHG report shall be submitted electronically in accordance with the requirements of WAC 173-441-050 and 173-441-060 and in a format specified by Ecology. Report submission due dates:

3.10.1 Facilities required to report GHG emissions to the EPA under 40 CFR. Part 98 must submit a report to Ecology no later than **March 31st** of each calendar year for GHG emissions in the previous calendar year.

3.10.2 Facilities not required to report GHG emissions to the EPA under 40 CFR. Part 98 must submit a report to Ecology no later than **October 31st** of each calendar year for GHG emissions in the previous calendar year. (Note: Permittee is anticipated to trigger this report deadline.)

All requests, notifications, and communications to Ecology pursuant GHG emissions reporting, other than submittal of the annual GHG report, shall be submitted to the following address:

Greenhouse Gas Report
Air Quality Program
Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

The permittee shall submit a revised annual GHG report within forty-five days of discovering that an annual GHG report that the person previously submitted contains one or more substantive errors. A substantive error is an error that impacts the quantity of GHG emissions reported or otherwise prevents the reported data from being validated or verified. The revised report must correct all substantive errors.

Ecology may notify the permittee in writing that an annual GHG report previously submitted contains one or more substantive errors. Such notification will identify each such error. The permittee shall, within forty-five days of receipt of the notification, either resubmit the report that, for each identified substantive error, corrects the identified substantive error (in accordance with the applicable requirements of this permit) or provide information demonstrating that the previously submitted report does not contain the identified substantive error or that the identified error is not a substantive error.
[WAC 173-441-050, 12/1/10 (S); WAC 173-441-100, 12/1/10 (S)]
The permittee shall maintain records in accordance with WAC 173-441-050, retaining, at a minimum, the following:

3.10.3 A list of all units, operations, processes, and activities for which GHG emissions were calculated.

3.10.4 The data used to calculate the GHG emissions for each unit, operation, process, and activity, categorized by fuel or material type. These data include, but are not limited to, the following information:

3.10.4.1 The GHG emissions calculations and methods used, as required by WAC 173-441-120, 12/1/10(S).

3.10.4.2 Analytical results for the development of site-specific emissions factors.

3.10.4.3 The results of all required analyses for high heat value, carbon content, and other required fuel or feedstock parameters.

3.10.4.4 Any facility operating data or process information used for the GHG emission calculations.

3.10.5 Copies of the annual GHG reports.

3.10.6 Missing data computations. For each missing data event, also retain a record of the cause of the event and the corrective actions taken to restore malfunctioning monitoring equipment.

3.10.7 The results of all required certification and quality assurance tests of continuous monitoring systems, fuel flow meters, and other instrumentation used to provide data for the GHGs reported under this chapter.

3.10.8 Maintenance records for all continuous monitoring systems, flow meters, and other instrumentation used to provide data for the GHGs reported under this chapter.

[WAC 173-441-050(6), 12/1/10 (S)]

All costs of activities associated with administering the reporting program, as described in RCW 70.94.151(2), are fee eligible. Permittee must pay a reporting fee for each year they submit a report to Ecology. [WAC 173-441-110, 12/1/10 (S)]

3.11 Permit Renewal and Expiration

This permit is issued for a fixed term of five (5) years. The permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted. A renewal application is due **April 9, 2017**. A complete renewal application is due no later than **October 9, 2017**. Upon receipt of a complete and timely application for renewal, this source may continue to operate subject to final action by Ecology on the renewal application. This protection 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 for renewal shall include the current permit number, the appropriate renewal fee, description of permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term and shall provide a compliance schedule therefor. The application shall be sent to:

Air Quality Section Manager
Department of Ecology
15 West Yakima Avenue, Suite 200
Yakima, Washington 98902

[WAC 173-401-500(4), 8/10/11; WAC 173-401-510(2), 8/10/11; WAC 173-401-610, 8/10/11; WAC 173-401-710, 8/10/11]

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), 8/10/11]

3.12 Off-Permit Changes

3.12.1 The source shall be allowed to make changes not specifically addressed or prohibited by the permit terms and conditions without requiring a permit revision, provided that the proposed changes do not weaken the enforceability of the existing permit conditions. Any change that is a Title I modification or is a change subject to the acid rain requirements under Title IV of the FCAA must be submitted as a permit revision.

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

3.12.3 Sources must provide contemporaneous written notice to Ecology and EPA of each such change.

Notification shall be submitted to Ecology at:

Air Quality Section Manager
Department of Ecology
15 West Yakima Avenue, Suite 200
Yakima, Washington 98902

and EPA Region 10 at:

ATTN: Air Permits Office AWT-107
U.S. EPA Region 10 Administrator
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.

3.12.4 The change shall not qualify for the permit shield under WAC 173-401-640.

3.12.5 The permittee shall keep a record 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.

3.12.6 A source making a change under this section shall comply with applicable preconstruction review requirements established pursuant to RCW 70.94.152.

[WAC 173-401-724, 8/10/11]

3.13 **Changes not Requiring Permit Revisions**

3.13.1 Permittee is authorized to make the changes described in this section without a permit revision, providing the following conditions are met:

3.13.1.1 The proposed changes are not Title I modifications;

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

3.13.1.3 The proposed changes do not alter permit terms that are necessary to enforce limitations on emissions from units covered by the permit; and

3.13.1.4 The source provides the administrator and Ecology with written notification at least seven (7) days prior to making the proposed changes except that written notification of a change made in response to an emergency shall be provided as soon as possible after the event.

Notification shall be submitted to Ecology at:

Air Quality Section Manager
Department of Ecology
15 West Yakima Avenue, Suite 200
Yakima, Washington 98902

and EPA Region 10 at:

ATTN: Air Permits Office AWT-107
U.S. EPA Region 10 Administrator
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

The permittee and Ecology shall attach each notice to their copy of the relevant permit.

3.13.2 Pursuant to conditions in 3.13.1, a Chapter 173-401 WAC source is authorized to make Section 502(b)(10) changes without a permit revision.

3.13.2.1 For each such change, the written notification required under 3.13.1.4 shall include a brief description of the change within the permitted source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

3.13.2.2 The permit shield authorized under WAC 173-401-640 shall not apply to any change made pursuant to this paragraph.

3.13.3 Pursuant to the conditions in 3.13.1, a Chapter 173-401 WAC source is authorized to trade increases and decreases in emissions in the permitted source, where the Washington SIP 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.

3.13.3.1 Written notification required under 3.13.1.4 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.

3.13.3.2 The permit shield described in WAC 173-401-640 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 SIP authorizing the emissions trade.

3.13.4 Upon the request of the permittee, 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 WAC 173-401 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 permittee shall include in its application proposed replicable procedures and permit terms that ensure the emissions trades are quantifiable and enforceable. The emissions trading provisions shall not be applied to any emissions units for which emissions are not quantifiable or for which there are no replicable procedures to enforce the emissions trades.

3.13.4.1 Under this paragraph, the written notification required under 3.13.1.4, shall state when the change will occur and shall describe the changes in emissions that will result and how these increases and decreases in emissions will comply with the terms and conditions of the permit.

3.13.4.2 The permit shield described in WAC 173-401-640 shall extend to terms and conditions that allow such increases and decreases in emissions.

3.13.5 A source making a change under this section shall comply with applicable preconstruction review requirements established pursuant to 70.94.152 RCW.

[WAC 173-401-722, 8/10/11]

3.14 Reopening for Cause

3.14.1 Permits shall be reopened and revised under any of the following circumstances:

3.14.1.1 Additional applicable requirements become applicable to a Chapter 173-401 WAC source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirements. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j).

3.14.1.2 Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

3.14.1.4 The administrator or Ecology determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

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

3.14.3 Reopenings under this section shall not be initiated before a notice of such intent is provided to the Chapter 173-401 WAC source by Ecology at least thirty (30) days in advance of the date that the permit is to be reopened, except that Ecology may provide a shorter time period in the case of an emergency.

[WAC 173-401-730, 8/10/11]

3.15 **New Source Review**

The permittee shall not construct new sources or make modifications required to be reviewed under WAC 173-400-010, WAC 173-400-560, WAC 173-400-720, WAC 173-400-820, or WAC 173-460-040 before the permittee obtains written final approval from Ecology in accordance with those regulations, pays the appropriate fees required by WAC 173-455-120, and pays the cost of public notice described in WAC 173-400-171. [WAC 173-400-110, 8/20/93, 11/28/12 (S); WAC 173-400-171, 8/20/93, 11/28/12 (S); WAC 173-400-560, 11/28/12 (S); WAC 173-400-720, 11/28/12 (S); WAC 173-400-820, 11/28/12 (S); WAC 173-455-120, 11/30/12 (S); WAC 173-460-040, 5/20/09 (S); RCW 70.94.152, 12/27/12 (S)]

3.16 **Replacement or Substantial Alteration of Emission Control Technology**

Prior to replacing or substantially altering emission control technology subject to review under WAC 173-400-114, the permittee shall file for and obtain approval from Ecology according to that regulation. The permittee shall pay the appropriate fees required by WAC 173-400-045(4) prior to commencing construction. [WAC 173-400-114(1), 11/28/12 (S); WAC 173-455-100(4), 11/30/12 (S); RCW 70.94.153, 12/27/12 (S)]

3.17 **Nonroad Engines**

Prior to installation or operation of a nonroad 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, 11/28/12 (S)]

3.18 **Demolition and Renovation (Asbestos)**

Prior to, during, and after conducting any activity to which 40 CFR 60, Subpart M - National Emission Standard for Asbestos, applies, the permittee shall comply with the requirements of that rule. Such activities include demolition, renovation, asbestos stripping or removal, installing or reinstalling insulation, manufacturing or fabricating certain items, spraying of certain materials, constructing roadways of certain materials, or disposal. [40 CFR 61, Subpart M, 7/1/12; WAC 173-400-075(1), 11/28/12 (S)]

3.19 **Federal Chlorofluorocarbon Requirements (Title VI)**

3.19.1 The permittee shall comply with the following standards for recycling and emissions reductions pursuant to 40 CFR 82, Subpart F, except as provided for MVACs in Subpart B:

3.19.1.1 Persons conducting maintenance, service, repair, or disposing must follow the prohibitions pursuant to 40 CFR 82.154.

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

3.19.1.3 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.

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

3.19.1.5 Persons conducting maintenance, service, repair, or disposing must certify to the Administrator that such person has acquired certified recovery or recycling equipment pursuant to 40 CFR 82.162.

3.19.1.6 Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166.

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

3.19.1.8 Owners/operators of appliances normally containing 50 or more pounds of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

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

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

3.19.4 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, 7/1/12; RCW 70.94.970, 12/27/12 (S); RCW 70.94.980, 12/27/12 (S)]

4.0 OPERATIONAL FLEXIBILITY

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.
[WAC 173-401-650, 8/10/11]

5.0 COMPLIANCE PLAN

5.1 The permittee shall continue to comply with applicable requirements with which it is currently in compliance.

5.2 The permittee shall meet applicable requirements on a timely basis that become effective during the permit term.

5.3 **Compliance certification**.

5.3.1 The permittee shall submit a certification of compliance with permit terms and conditions (i.e., sections 3, 4, 5, and 6) at least once per year. At a minimum a certification of compliance is due, for each October 1st through September 30th, no later than the following **November 15th**. 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.

5.3.2 The compliance certification shall include the following:

5.3.2.1 The identification of each term or condition of the permit that is the basis of the certification.

5.3.2.2 The compliance status.

5.3.2.3 Whether compliance was continuous or intermittent.

5.3.2.4 The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with WAC 173-401-615(3)(a).

5.3.3 Compliance certification shall be submitted to Ecology at:

Air Quality Section Manager
Department of Ecology
15 W Yakima Ave, Ste 200
Yakima, Washington 98902

and EPA Region 10 at:

ATTN: Air Permits Office AWT-107
U.S. EPA Region 10 Administrator
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

[WAC 173-401-630(5), 8/10/11]

5.3.4 Where the permit conditions of Section 6 do not require testing, monitoring, recordkeeping and reporting for insignificant emissions units or activities, the permittee may certify continuous compliance if there were no observed, documented, or known instances of noncompliance during the reporting period. [WAC 173-401-530(2)(d), 8/10/11]

5.3.5 Where the permit conditions of Section 6 require testing, monitoring, recordkeeping and reporting for insignificant emission units or activities, the permittee may certify continuous compliance when the testing, monitoring, recordkeeping required by the permit revealed no violations during the period, and there were no observed, documented, or known instances of noncompliance during the reporting period. [WAC 173-401-530(2)(d), 8/10/11]

5.3.6 For the purpose of submitting compliance certifications or establishing violations, the permittee shall not 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 or procedure had been performed. [40 CFR 60.11(g), 7/1/12]

[WAC 173-401-630(3), 8/10/11; WAC 173-401-510(2)(h), 8/10/11]

5.4 **Schedule of Compliance.**.

The permittee is currently out of compliance with NOC Order No. 02AQCR-5091 due to operation of stud mill kiln #2 in a manner differing from the plans, specifications, and other information submitted to Ecology during permitting of the unit. The permittee must comply with the following schedule of compliance:

5.4.1 Until Condition 5.4.2 is completed, the permittee shall comply with the "temporary" production limitation, as described in AOP Condition 6.7.2.

5.4.2 By June 1, 2015, the permittee shall revise NOC Order No. 02AQCR-5091 to set lumber drying production limit for Stud Mill Kin #2 which assures VOC emissions for the unit remain below 39 tpy. Such revision shall be based on either:

5.4.2.1 Site-specific source testing for P4-6 Stud Mill Kiln #2, pending Ecology review and approval of the resulting emission factors developed.

5.4.2.2 The EPA Region 10 dry kiln HAP and VOC emission factors, issued December 20, 2012.

6.0 APPLICABLE REQUIREMENTS

Until this permit expires, is modified, or revoked, this permittee is authorized to operate air emission units in processes one (1) through nine(9). These emission units are subject to the requirements shown in Tables 6.1 through 6.9, and to the other terms and conditions specified in this permit.

6.1 Process 1: Facility Wide Sources

The following requirements apply SOURCE-WIDE; including, but not limited to, the hog fuel boiler, two veneer dryers, plywood sanding, material handling and storage, new stud mill (stud mill #2), dry kiln #2, debarker, logyard, and the paint booth, unless an alternate requirement is specifically stated for a particular emission unit. Since monitoring, recordkeeping, and reporting has not specifically been required by Ecology for insignificant emission units, per WAC 173-400-105(1st), there are no air operating permit monitoring, recordkeeping, and reporting requirements for the insignificant emission units under this Source-wide section, as allowed per WAC 173-401-530(2)(c).

	Applicable Requirement (Facility Wide Sources)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.1.1	RCW 70.94.040, 12/27/12	S	Unlawful for any person to cause air pollution or permit it to be caused in violation of Chapter 70.94 RCW, or of any ordinance, resolution, rule or regulation validly promulgated thereunder.	None specified.	No additional monitoring required.
6.1.2	WAC 173-400-040(1st ¶), 8/20/93 _____ WAC 173-400-040(1), 3/1/11; RCW 70.94.154, 12/27/12	F _____ S	All emission units are required to use RACT. (Condition 6.2.4 applies to the hog fuel boiler)	None specified.	No additional monitoring required.
6.1.3	WAC 173-400-040(3), 11/28/12; WAC 173-401-615(1), 8/10/11	S	No person shall cause or allow the emission of particulate matter from any source to be deposited beyond the property under direct control of the owner or operator of the source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited.	None specified.	The permittee shall keep a written record of all complaints received by either the permittee or Ecology. Any complaints shall be promptly assessed for validity. Ecology shall be notified within three (3) days of receipt of any complaints. It will be a violation of the conditions of the permit if necessary corrective action is not taken or commenced by the permittee and the permittee has not responded to the complaint within three (3) working days of receipt of the complaint by the permittee. The recordkeeping requirements for the source shall include a record of all complaints, the permittee's action to investigate the validity of the complaint and what, if any, corrective action was taken in response to the complaint. [WAC 173-401-615(1), 8/10/11]

	Applicable Requirement (Facility Wide Sources)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.1.4	WAC 173-400-040(1)(a), (b), 8/20/93 WAC 173-400-040(2), 3/1/11; WAC 173-401-615(1), 8/10/11	F S	Opacity shall not exceed 20% for more than three (3) minutes, in any one (1) hour.	Ecology Method 9A, "Source Test Manual - Procedures for Compliance Testing," State of Washington Department of Ecology, 7/12/90. [WAC 173-401-615(1), 8/10/11]	1) The permittee shall conduct monthly visible emissions surveys of the source during daylight hours as follows: a) the survey shall be conducted from a location with a clear view of the source and where the sun is not directly in the observer's eyes. The survey location shall be at least 15 feet but not more than 0.25 miles from the source; b) the survey shall be conducted during a production shift; 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 15 second visual observation of each stack and emission point to identify those stacks or emission points which exhibit visible emissions; e) in addition to the records required under Condition 2.5, the observer shall record the wind direction, sky condition, sun location with respect to the source and the survey location, and the time duration of the survey. 2) The permittee shall conduct Ecology Method 9A testing of an emission unit when visible emissions, other than uncombined water, are observed during a survey or are otherwise observed by the permittee. Testing shall be conducted as follows: a) testing shall be initiated as soon as possible, but not later than 24 hours after the requirement to conduct such testing is triggered; b) all testing shall be performed during periods when the subject emission unit is operating; c) testing shall consist of certified opacity readings at 15 second intervals over a minimum period of three consecutive minutes (12 consecutive readings) unless any two readings are greater than 20% opacity in which case the testing period shall be 60 consecutive minutes or until a violation is documented. [WAC 173-401-615(1), 8/10/11]

	Applicable Requirement (Facility Wide Sources)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.1.5	WAC 173-400-040(3)(a), 8/20/93 WAC 173-400-040(4)(a), 11/28/12; WAC 173-401-615(1), 8/10/11	F S	Reasonable precautions shall be taken to control fugitive emissions.	None specified.	Reasonable precautions include, but are not limited to, dust control of the logyard and unpaved areas of travel, sweeping of paved areas of travel, and containment of chips and sawdust, whenever conditions favor the generation of fugitive emissions. The permittee shall keep a written record of complaints received by the permittee. Any complaints shall be promptly assessed for validity. Ecology shall be notified within three (3) days of receipt of any valid complaints. It will be a violation of the conditions of the permit if necessary corrective action is not taken or commenced by the permittee and the permittee has not responded to the complaint within three (3) working days of receipt of the complaint by the permittee. The permittee shall inspect potential sources of fugitive emissions at least once per week for evidence of fugitive emissions. The recordkeeping requirements for the source shall include a record of the time and date of complaints and inspections, the name of the complainant if provided by the complainant, the name of the person recording the complaint or conducting the inspection, areas inspected, description of complaint, time date, and nature of action to investigate the complaint, permittee's conclusions regarding the source of the emissions and the time, date and nature of any corrective action taken in regard to complaints or inspections. [WAC 173-401-615(1), 8/10/11]
6.1.6	WAC 173-400-040(5), 11/28/12; WAC 173-401-615(1), 8/10/11	S	Odors which may unreasonably interfere with use and enjoyment of property are prohibited unless recognized good practice and procedures are employed to reduce odors to a reasonable minimum.	None specified.	Adhere to "Monitoring, Recordkeeping, and Reporting to be Performed by Permittee," for Condition 6.1.3. [WAC 173-401-615(1), 8/10/11]
6.1.7	WAC 173-400-040(5), 8/20/93 WAC 173-400-040(6), 11/28/12; WAC 173-401-615(1), 8/10/11	F S	No emissions detrimental to persons or property.	None specified.	Adhere to "Monitoring, Recordkeeping, and Reporting to be Performed by Permittee," for Condition 6.1.3. [WAC 173-401-615(1), 8/10/11]

	Applicable Requirement (Facility Wide Sources)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.1.8	WAC 173-400-040(6)(1st ¶), 8/20/93 WAC 173-400-040(7), 11/28/12; WAC 173-401-615(1), 8/10/11	F S	SO_2 shall not exceed 1000 ppm_v on a dry basis, corrected to 7% O_2 for combustion sources, and based on the average of any period of sixty (60) consecutive minutes.	EPA RM 8, 40 CFR Part 60, Appendix A, 7/1/12. [WAC 173-401-615(1), 8/10/11]	No additional monitoring required.
6.1.9	WAC 173-400-040(7), 8/20/93 WAC 173-400-040(8), 11/28/12	F S	No person shall cause or permit the installation or use of any means which conceals or masks an emission of an air contaminant.	None specified.	No additional monitoring required.
6.1.10	WAC 173-400-040(8)(a), 8/20/93 WAC 173-400-040(9)(a), 11/28/12; WAC 173-401-615(1), 8/10/11	F S	Reasonable precautions shall be taken to prevent fugitive dust from becoming airborne.	None specified.	Adhere to "Monitoring, Recordkeeping, and Reporting to be Performed by Permittee," for Condition 6.1.5. [WAC 173-401-615(1), 8/10/11]
6.1.11	WAC 173-400-050(1), (3), 8/20/93 WAC 173-400-050(1), (3), 11/28/12; WAC 173-401-615(1), 8/10/11	F S	PM emissions from combustion sources shall not exceed 0.1 gr/dscf corrected to 7% O_2. (Alternate requirement applies to the hog fuel boiler)	EPA RM 5, 40 CFR Part 60, Appendix A, 7/1/12. [WAC 173-401-615(1), 8/10/11]	No additional monitoring required.
6.1.12	WAC 173-400-200(2), 8/20/93 WAC 173-400-200(2), 11/28/12	F S	No use of excess stack height or dispersion techniques to meet ambient air quality standards	None specified.	No additional monitoring required.
6.1.13	WAC 173-400-205, 8/20/93 WAC 173-400-205, 11/28/12	F S	No varying of emissions according to atmospheric conditions or ambient concentrations.	None specified.	No additional monitoring required.

	Applicable Requirement (Facility Wide Sources)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.1.14	WAC 173-400-060, 8/20/93 _____ WAC 173-400-060, 11/28/12; WAC 173-401-615(1), 8/10/11	F _____ S	General process units, as defined at WAC 173-400-030(40), are required to meet all applicable provisions of WAC 173-400-040. PM emissions from any general process operation shall not exceed 0.1 gr/dscf of exhaust gas.	RM 5, 40 CFR part 60, Appendix A, 7/1/12. [WAC 173-401-615(1), 8/10/11]	The permittee shall do one of the following options: 1) Conduct an initial RM 5 source test while keeping record of the operating conditions, including temperature, process, and power consumption rates. Then, assign, as part of a person's regular duty, at least once per day, when the source is operating, the responsibility of recording the operating conditions, including temperature, process, and power consumption rates. The responsible official shall then verify and certify that the source was operated under conditions represented by the source test. Or, 2) The permittee shall keep records of the source's calculated PM concentration, when there is a change in material processed, or equipment capacity, using an Ecology approved emission factor, per WAC 173-400-103(1), and estimated stack exhaust flow rate. Option 1 shall be applied to all sources for which the calculated PM concentration is greater than 0.05 gr/dscf. [WAC 173-401-615(1), 8/10/11]
6.1.15	Synthetic Minor Order No. 07AQ-C061, 9/30/07, Conditions 2.1.1, 2.1.2, 2.1.3, 2.2.1, 2.2.2, 2.2.3	F	Emissions of any single hazardous air pollutant (HAP) shall be less than 10 tons per year. Total HAP emissions shall be less than 25 tons per year. All yearly limits shall be quantified as a 12-month rolling total, rolled on a monthly basis.	None specified.	Monthly individual and total HAP emissions shall be quantified by multiplying designated emission factors by the relevant recorded monthly operation / production rates. Annual single and total HAP emissions shall be quantified by summing the most recent twelve month HAP emissions. HAP emissions shall be summed monthly and reported to Ecology per Condition 3.6.1. [Synthetic Minor Order No. 07AQ-C061, 9/30/07, Conditions 2.2.1, 2.2.2, 2.2.3]

	Applicable Requirement (Facility Wide Sources)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.1.16	WAC 173-425-036, WAC 173-425-095, WAC 173-425-140, 9/17/90; WAC 173-425-045, 1/3/89; NOC Order No. DE 97AQ-C164 First Revision, 5/8/98, Condition 5.5.2; NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.9.4 RCW 70.94.650, 12/27/12; RCW 70.94.750, 12/27/12; RCW 70.94.775, 12/27/12; WAC 173-401-615(1), 8/10/11; WAC 173-425-020, 3/13/00; WAC 173-425-040, 3/13/00; WAC 173-425-050, 3/13/00; WAC 173-425-060, 3/13/00; WAC 173-425-070, 3/13/00; WAC 173-435-050(2), 1/3/89	F S	Open burning subject to restrictions.	None specified.	Records shall be kept of all instances of open burning which occur at the source. [WAC 173-401-615(1), 8/10/11]
6.1.17	NOC Order No. DE 97AQ-C164 First Revision, 5/8/98, Condition 3.5.5; NOC Order No. DE 98AQ-C143, 6/11/98, Condition 2.6.4; NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.9.7	F	Access to the source by the EPA or Ecology shall be permitted upon request for purposes of compliance assurance inspections.	None specified.	No additional monitoring required.

6.2 **Process 2: Hog Fuel Boiler**
The following requirements apply to the HOG FUEL BOILER:

	Applicable Requirement (Hog Fuel Boiler)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.2.1	40 CFR 64.4(a)(1), 64.4(c)(1), 64.7, 64.8, 64.9, 7/1/12; WAC 173-400-040(2)(a), 11/28/12; WAC 173-400-050(1), (3), 8/20/93 _____ WAC 173-400-050(1), (3), 11/28/12; NOC Order No. DE 98AQ-C143, 6/11/98, Conditions 2.2.1, 2.4.4, 2.4.5, 2.4.6, 2.4.8.	F _____ S	PM shall not exceed 0.040 gr/dscf, corrected to 7% O_2, from the dry electrostatic precipitator (DESP) outlet. PM shall not exceed 14.9 lb/hr.	RM 1-5, 40 CFR part 60, Appendix A, 7/1/12 and RM 202, 40 CFR part 51, Appendix M, 7/1/12. Test to be conducted within 90% of maximum production rate, include a complete operation cycle (i.e., contain the full fifteen (15) consecutive minutes allowed for grate cleaning and soot blowing), and be reflective of normal source operation. [NOC Order No. DE 98AQ-C143, Conditions 2.4.3, 2.4.4, 2.4.5, 2.4.6; WAC 173-400-040(2)(a), 11/28/12] Parameter operating ranges: secondary voltage ≥ 28 kilovolts (kV). [CAM Plan for Particulate Matter from Hog Fuel Boiler, 3/6/12; 40 CFR 64.4(a)(2), 7/1/12]	**1)** Perform RM 1-5 and RM 202 source test on intervals not to exceed five (5) years. Submit test plan at least 30 days prior to test. Submit test results within 30 days of test. [NOC Order No. DE 98AQ-C143, 6/11/98, Conditions 2.4.1, 2.4.2, 2.4.3, 2.4.8]; **2)** Record stack exhaust temperature, steam production rate, and primary and secondary ESP voltage and amperage readings during testing. [NOC Order No. DE 98AQ-C143, 6/11/98, Condition 2.4.6; CAM Plan for Particulate Matter from Hog Fuel Boiler, 3/6/12; 40 CFR 64.4(c)(1), 7/1/12] **3)** Monitor ESP primary and secondary field voltage and primary and secondary field amperage. [NOC Order No. DE 98AQ-C143, 6/11/98, Condition 2.3.1] **4)** At least once each six (6) hours of boiler operation, the permittee shall record the monitored values for secondary voltage, in the third DESP cell. If the secondary voltage is less than 28 kV, the permittee shall promptly review the monitored values from the previous 48 hours of boiler operation (hereafter referred to as "additional monitored values"). If no additional monitored values are less than 28 kV, no corrective action is required. If any additional monitored values are less than 28 kV, an excursion has occurred and corrective action shall be taken as soon as possible, but no later than 4 hours after discovery of the excursion. The permittee shall initiate corrective actions that are designed to return the equipment to normal operation as soon as possible and to prevent the likely recurrence of the cause of the excursion. Corrective action taken may include, but will not be limited to, checking rappers and vibrators for proper operation, checking bottom hoppers for buildup, checking DESP electrical systems, increasing the sonic blowdown, turning on the bottom vibrator, dumping the transformer-rectifier set for an appropriate amount of time, obtaining manufacturer advice, and DESP shutdown and internal inspection along with appropriate subsequent maintenance and/or repair. Secondary voltage monitor shall be calibrated, at least annually, and maintained

	Applicable Requirement (Hog Fuel Boiler)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
					according to manufacturer's recommendations. In the event of an excursion, the permittee shall maintain records per Condition 3.5.1, and shall report per Condition 3.6.2. Additionally, the records and report shall include summary information on the number, duration and cause of excursions, and the corrective action(s) taken. The occurrence of more than one excursion in any 12-month period will require the development of a Quality Improvement Plan (QIP) meeting the requirements of 40 CFR part 64.8(b). Reporting according to Condition 3.6.1 shall include summary information on the number, duration and cause for monitor downtime incidents; and a description of actions taken to implement a QIP, if applicable. [CAM Plan for Particulate Matter from Hog Fuel Boiler, 3/6/12; 40 CFR 64.4(a)(1), 7/1/12; 40 CFR part 64.7, 7/1/12; 40 CFR part 64.8, 7/1/12; 40 CFR part 64.9, 7/1/12]
6.2.2	WAC 173-400-070(2)(a), 8/20/93; WAC 173-400-105(5)(d), 8/20/93; NOV No. DE 87-C392, 4/15/88, Item 2 WAC 173-400-070(2)(a), 11/28/12; WAC 173-400-105(5)(d), 11/28/12; NOC Order No. DE 98AQ-C143, 6/11/98, Conditions 2.2.2, 2.2.3, 2.3.2	F S	Opacity as calculated by using a six (6) minute averaging time shall not exceed 10%.	RM 9, 40 CFR part 60, Appendix A, 7/1/12. COMS shall meet all provisions of 40 CFR part 60, Appendix B, Performance Specification, operated according to quality assurance procedures conforming to EPA 340/1-86-010, Recommended Quality Assurance Procedures of COMS. [NOV No. DE 87-C392, 4/15/88, Item 2]	Install, calibrate, maintain and operate equipment for continuously[1] monitoring and recording opacity (COMS). [WAC 173-400-105(5)(d), 11/28/12]

[1] Continuously shall mean 95% of the monthly boiler operation, except for periods of monitoring system down-time, provided that the permittee demonstrates that the down time was not a result of inadequate design, operation, maintenance, or any other reasonably preventable condition, and any necessary repairs to the monitoring system were conducted in a timely manner.

	Applicable Requirement (Hog Fuel Boiler)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.2.3	WAC 173-400-040(6)(1st ¶), 8/20/93 WAC 173-400-040(7)(1st ¶), 11/28/12; WAC 173-401-615(1), 8/10/11	F S	SO_2 shall not exceed 1000 ppm_v on a dry basis, corrected to 7% O_2 and based on the average of any period of sixty (60) consecutive minutes.	EPA RM 8, 40 CFR Part 60, Appendix A, 7/1/12. [WAC 173-401-615(1), 8/10/11]	Recordkeeping of the unit's calculated SO_2 concentration when there is a change in fuel type, or boiler production capacity, using an Ecology approved emission factor or mass balance, per WAC 173-400-103(1), and estimated stack exhaust gas flow rate, and corrected for O_2 as applicable. [WAC 173-401-615(1), 8/10/11]
6.2.4	NOC Order No. DE 80-184, 2/27/80, Condition 2 NOC Order No. DE 98AQ-C143, 6/11/98, Conditions 2.3.1, 2.3.4, 2.5.1, 2.5.2; WAC 173-401-615(1), 8/10/11	F S	All equipment associated with the hog fuel boiler and the pollution control equipment shall be maintained in good condition and properly operated in accordance with a site-specific Operation & Maintenance (O&M) manual.	None specified.	The permittee shall keep records of all maintenance of the hog fuel boiler pollution control equipment. The boiler and DESP O&M manual shall be kept on file. This file shall be reviewed at least annually with records kept of the date of and personnel who performed such review. Responsible official shall certify that the DESP is being operated per the O&M manual. [WAC 173-401-615(1), 8/10/11] The O&M manual shall include all procedures necessary to ensure the operation of the hog fuel boiler and the DESP conform to all permit conditions and state regulations. At a minimum, the O&M manual shall include normal operating parameters, including baseline operating parameters collected during testing; a maintenance schedule; monitoring and record keeping requirements; a description of the monitoring procedures; and actions for abnormal control system operation. The O&M manual shall also include opacity continuous emission monitoring system quality assurance procedures and DESP ash handling and disposal plan which covers all aspects of ash cleaning, storing, stockpiling, and transportation methods. [NOC Order No. DE 98AQ-C143, 6/11/98, Conditions 2.5.1, 2.5.2]
6.2.5	NOC Order No. DE 80-184, 2/27/80, Condition 3 WAC 173-401-615(1), 8/10/11	F S	Multiclone cinder collector drop box shall be emptied on a regular schedule, as submitted to Ecology.	None specified.	Recordkeeping of emptying of the multiclone cinder collector drop box. Record shall include emptying time, date, and method of disposal. [WAC 173-401-615(1), 8/10/11]

	Applicable Requirement (Hog Fuel Boiler)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.2.6	NOC Order No. DE 80-184, 2/27/80, Condition 4 WAC 173-401-615(1), 8/10/11	F S	Material collected by the multiclone shall be properly disposed of such that it will not enter the air or water.	None specified.	Adhere to "Monitoring, Recordkeeping, and Reporting to be Performed by Permittee," for Condition 6.2.5. [WAC 173-401-615(1), 8/10/11]
6.2.7	NOC Order No. DE 80-184, 2/27/80, Condition 5 WAC 173-401-615(1), 8/10/11	F S	At least one (1) employee of the mill shall be trained in the routine maintenance and operation of the boiler.	None specified.	Recordkeeping of those employees who are trained in the routine maintenance and operation of the boiler. Verification of, and certification by a responsible official that at least one employee, trained in the routine maintenance and operation of the boiler, is on-site during all times when the hog fuel boiler is operating. [WAC 173-401-615(1), 8/10/11]
6.2.8	NOC Order No. DE 80-184, 2/27/80 NOC Order No. DE 98AQ-C143, 6/11/98, Conditions 2.1.4, 2.6.5; WAC 173-401-615(1), 8/10/11	F S	Operation of the hog fuel boiler and its controls must be conducted in compliance with all data and specifications submitted as part of the NOC applications unless otherwise approved by Ecology. Any modification to the hog fuel boiler, ESP, or the operating procedures shall be reported to Ecology and may require a NOC.	None specified.	A file shall be kept of all plans, specifications, and other information submitted to Ecology relative to NOC Order No. DE 80-184 and NOC Order No. DE 98AQ-C143. This file shall be reviewed at least annually. Recordkeeping of the date of and personnel who performed such review. Responsible official shall certify that the hog fuel boiler is operating per the file. [WAC 173-401-615(1), 8/10/11]
6.2.9	Notice of Violation No. DE 87-C392, 4/15/88, Item 1 NOC Order No. DE 98AQ-C143, 6/11/98, Conditions 2.1.1, 2.3.3	F S	Operation of the hog fuel boiler shall be limited to 80,000 pounds of steam per hour.	None specified.	Continuous[2] recordkeeping of boiler steam flow rate. In addition, a log shall be kept of the hours of operation of the hog fuel boiler. [NOC Order No. DE 98AQ-C143, 6/11/98, Condition 2.3.3]
6.2.10	NOC Order No. DE 98AQ-C143, 6/11/98, Condition 2.1.2; WAC 173-401-615(1), 8/10/11	S	The DESP shall be on-line at all times that the hog fuel boiler is operated.	None specified.	A log shall be kept of the hours of operation of the DESP. [WAC 173-401-615(1), 8/10/11]

[2] "Continuous" shall be construed as defined under "Monitoring, Recordkeeping, and Reporting to be Performed by Permittee" for Condition 5.2.3.

	Applicable Requirement (Hog Fuel Boiler)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.2.11	40 CFR §63.11205, §63.11223, §63.11196(1), §63.11201(b), §63.11210(c), §63.11223(a), §63.11223(b), §63.11223(c), §63.11225(b), §63.11225(c), 2/1/13 (Area Source Boiler Rule Subpart JJJJJJ)	F	At all times the permittee must operate and maintain the hog fuel boiler, DESP, and the COMS in a manner consistent with safety and good air pollution control practices for minimizing emissions.	The boiler tune-up shall include at least: • Inspect the burner, and clean or replace any components of the burner as necessary. • Inspect the flame pattern, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. • Inspect the system controlling the air-to-fuel ratio, and ensure that it is correctly calibrated and functioning properly. • Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available. • Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made. Measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made. Measurements may be taken with a portable CO analyzer. The tune-up shall be	The initial tune-up of the boiler is due no later than March 21, 2014 and according to the applicable provisions in § 63.7(a)(2). Performance tune-ups of the boiler shall be conducted every 5 years thereafter. 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. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up The burner inspection and the inspection of the system controlling the air-to-fuel ratio may be delayed until the next scheduled unit shutdown; however the permittee must conduct these inspections at least once every 72 months. The permittee shall maintain records identifying the boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned. The permittee shall prepare, by March 1 of each 5-year period, and submit to Ecology or the EPA upon request, a 5-year compliance certification report for the previous calendar years containing the information specified in 40 CFR §63.11225(b). You must submit the report by March 15 if you had any instance described by in 40 CFR §63.11225(b)(3). The permittee shall maintain onsite and submit, if requested by Ecology or the EPA, a 5-year report containing: • 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. • A description of any corrective actions taken as a part of the tune-up of the boiler. • The type and amount of fuel used over the 12 months prior to the 5-year tune-up of the boiler. The permittee shall also maintain: • Records of the occurrence and duration of each malfunction of the boiler, or of the DESP. • 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

	Applicable Requirement (Hog Fuel Boiler)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
				conducted while burning hog fuel. [40 CFR §63.11223; 40 CFR §63.11214; 40 CFR §63.11201(b); 40 CFR §63.11223(a)]	corrective actions to restore the malfunctioning boiler or DESP to their normal or usual manners of operation. [§63.11201(b)]; [40 CFR §63.11196 (1); §63.11210 (c)] [11223(a)] [40 CFR §63.11223(b)(6)]
6.2.12	40 CFR §63.11196(3), §63.11201, §63.11214, 2/1/13 (Area Source Boiler Rule Subpart JJJJJJ)		The hog fuel boiler must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements specified in 40 CFR §63.11201 satisfies the energy assessment requirement. If the permittee operates under an energy management program compatible with ISO 500001, that includes the hog fuel boiler, satisfies the energy assessment requirement as well.	The energy assessment must include include the elements specified in 40 CFR §63.11201. [40 CFR §63.11201]	The permittee shall achieve compliance with the energy assessment requirement no later than March 21, 2014. [40 CFR §63.11196(3)] The permittee must submit a signed certification in the Notification of Compliance Status report that an energy assessment of the boiler and its energy use systems was completed and is an accurate depiction of your facility. [40 CFR §63.11214]
6.2.13	40 CFR §63.11201(b), §63.11225(1), §63.11225(a)(4) §63.11225(a), 2/1/13 (Area Source Boiler Rule Subpart JJJJJJ)	F	The permittee shall submit all initial notifications which apply to the hog fuel boiler as specified by 40 CFR 63 Subpart JJJJJJ	None specified.	Submit all of the notifications in §§ 63.7(b): 63.8(e) and (f); 63.9(b) through (e); and 63.9(g) and (h) that apply to the hog fuel boiler by the dates specified in those sections. As specified in 40 CFR §63.9(b)(2), submit the Initial Notification no later than January 20, 2014. [40 CFR §63.11225(1); 40 CFR §63.11225] Submit a Notification of Compliance Status, in accordance with 40 CFR §63.9(h), no later than 120 days after July 19, 2014. The notification shall be signed by a responsible official and shall include the applicable certifications of compliances listed in 40 CFR 63.11225(a)(4) [40 CFR 63.11225(a)(4)]

	Applicable Requirement (Hog Fuel Boiler)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.2.14	NOC Order No. DE 98AQ-C143, 6/11/98, Condition 2.6.1	S	Legible copies of NOC Order No. DE 98AQ-C143 & the O&M manual shall be in the working vicinity and available to employees in direct operation of the source.	None specified.	No additional monitoring required.
6.2.15	NOC Order No. DE 98AQ-C143, 6/11/98, Condition 2.6.2	S	It shall be grounds for recision of NOC Order No. DE 98AQ-C143 if physical operation of the hog fuel boiler is discontinued for a period of 18 months or more.	None specified.	No additional monitoring required.

6.3 **Process 3: Veneer Dryers**

The following requirements apply to the VENEER DRYERS:

	Applicable Requirement (Veneer Dryers)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.3.1	NOC Order No. DE 95AQ-C221, 8/4/95, Conditions 1.1, 1.2; WAC 173-401-615(1), 8/10/11	S	The wet electrostatic precipitator (WESP) shall be operated & maintained according to an O&M manual.	None specified.	The WESP O&M manual shall be kept on file. This file shall be reviewed at least annually with records kept of the date of and personnel who performed such review. Responsible official shall certify that the WESP is being operated per the O&M manual. [WAC 173-401-615(1), 8/10/11] The O&M manual shall include, but not limited to, normal operating parameters for the air pollution control systems, including but not limited to primary and secondary voltage, primary and secondary current, spark rate, inlet and outlet gas temperature, and gas flow rate; a maintenance schedule for the control systems; monitoring and record keeping requirements; a description of the monitoring requirements; and actions for abnormal control system operation. [NOC Order No. DE 95AQ-C221, 8/4/95, Condition 1.2]

	Applicable Requirement (Veneer Dryers)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.3.2	NOC Order No. DE 95AQ-C221, 8/4/95, Condition 2.2; WAC 173-401-615(1), 8/10/11	S	WESP opacity shall not exceed 10%.	RM 9, 40 CFR part 60, Appendix A, 7/1/12. [WAC 173-401-615(1), 8/10/11]	1) The permittee shall conduct monthly visible emissions surveys of the source during daylight hours as follows: a) the survey shall be conducted from a location with a clear view of the source and where the sun is not directly in the observer's eyes. The survey location shall be at least 15 feet but not more than 0.25 miles from the source; b) survey shall be conducted during a production shift; 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 15 second visual observation of the WESP exhaust stack; e) in addition to the records required under Condition 2.5, the observer shall record the wind direction, sky condition, sun location with respect to the source and the survey location, and the time duration of the survey. 2) The permittee shall conduct RM 9 testing of an emission unit when visible emissions, other than uncombined water, are observed during a survey or are otherwise observed by the permittee. Testing shall be conducted as follows: a) testing shall be initiated as soon as possible, but not later than 24 hours after the requirement to conduct such testing is triggered; b) all testing shall be performed during periods when the subject emission unit is operating; c) testing shall consist of certified opacity readings at 15 second intervals over a period of six consecutive minutes (24 consecutive readings). [WAC 173-401-615(1), 8/10/11]
6.3.3	NOC Order No. DE 95AQ-C221, 8/4/95; WAC 173-401-615(1), 8/10/11	S	All plans, specifications and other information submitted to Ecology relative to this project ... shall be incorporated herein and made a part hereof.	None specified.	A file shall be kept of all plans, specifications, and other information submitted to Ecology relative to NOC Order No. DE 95AQ-C221. This file shall be reviewed at least annually. Recordkeeping of the date of and personnel who performed such review. Responsible official shall certify that the hog fuel boiler is operating per the file. [WAC 173-401-615(1), 8/10/11]

	Applicable Requirement (Veneer Dryers)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.3.4	NOC Order No. DE 95AQ-C221, 8/4/95, Condition 2.1; WAC 173-401-615(1), 8/10/11	S	WESP PM collection efficiency shall be ≥ 80%.	RM 5, 40 CFR part 60, Appendix A, 7/1/12, performed on both inlet and exhaust. [173-401-615(1), 8/10/11] Parameter operating ranges: secondary voltage ≥ 45 kV; secondary amperage ≥ 100 mA; no arcing from the insulator compartments. [WESP O&M Manual, Section 9.0 Regularly Scheduled Maintenance, as received, by Ecology, on 6/18/04.]	At least once each day, when the source is operating, record the following precipitator parameters: secondary voltage, secondary amperage, and whether there is any arcing from the insulator compartments. A parameter outside of the indicated range shall be considered an excursion. If an excursion occurs, corrective action shall be taken as soon as possible but in any case within three (3) working days. Corrective action taken may include, but will not be limited to: running additional flush cycles, realigning and tightening discharge electrode assembly(s), cleaning and drying the insulators, obtaining manufacturer advice, and WESP shutdown and internal inspection along with appropriate subsequent maintenance and/or repair. Taking such corrective action does not negate any reporting requirements for such excursions. In addition to records required under Condition 3.5.1, records shall include summary information on the number, duration and cause of excursions, and the corrective action(s) taken. For days on which the source is not operating, records indicating as such shall be sufficient monitoring. [WAC 173-401-615(1), 8/10/11]

6.4 **Process 4: Plywood Sanding**

The following requirements apply to PLYWOOD SANDING:

	Applicable Requirement (Plywood Sanding)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.4.1	NOC Order No. DE 97AQ-C164 First Revision, 5/8/98, Condition 3.1	F	PM shall be controlled by use of a cyclone and baghouse in series.	None specified.	No additional monitoring required.

	Applicable Requirement (Plywood Sanding)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.4.2	NOC Order No. DE 97AQ-C164 First Revision, 5/8/98, Conditions 3.2.1, 3.2.2, 3.4.2 WAC 173-401-615(1), 8/10/11	F S	PM emissions shall not exceed 0.01 gr/dscf for the three (3) pre-1997 baghouses. PM emissions shall not exceed 0.005 gr/dscf for the 1997 baghouse (most westerly).	RM 5, 40 CFR part 60, Appendix A, 7/1/12. [NOC Order No. DE 97AQ-C164 First Revision, 5/8/98, Condition 3.4.2]	Verification of, and certification by the responsible official that cyclones and baghouses used to control PM at all times when plywood sanding occurs are properly operated and maintained per the O&M manual specified in Condition 6.4.4. [WAC 173-401-615(1), 8/10/11]
6.4.3	NOC Order No. DE 97AQ-C164 First Revision, 5/8/98, Conditions 3.2.3, 3.4.3 WAC 173-401-615(1), 8/10/11	F S	Opacity shall not exceed five (5) percent.	RM 9, 40 CFR part 60, Appendix A, 7/1/12. [NOC Order No. DE 97AQ-C164 First Revision, 5/8/98, Condition 3.4.3]	1) The permittee shall conduct monthly visible emissions surveys of the source during daylight hours as follows: a) the survey shall be conducted from a location with a clear view of the source and where the sun is not directly in the observer's eyes. The survey location shall be at least 15 feet but not more than 0.25 miles from the source; b) survey shall be conducted during a production shift; 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 15 second visual observation of each plywood sander baghouse exhaust; e) in addition to the records required under Condition 3.5, the observer shall record the wind direction, sky condition, sun location with respect to the source and the survey location, and the time duration of the survey. 2) The permittee shall conduct RM 9 testing of an emission unit when visible emissions are observed during a survey or are otherwise observed by the permittee. Testing shall be conducted as follows: a) testing shall be initiated as soon as possible, but not later than 24 hours after the requirement to conduct such testing is triggered; b) all testing shall be performed during periods when the subject emission unit is operating; c) testing shall consist of certified opacity readings at 15 second intervals over a minimum period of six consecutive minutes (24 consecutive readings). [WAC 173-401-615(1), 8/10/11]

	Applicable Requirement (Plywood Sanding)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.4.4	NOC Order No. DE 97AQ-C164 First Revision, 5/8/98, Condition 3.3 WAC 173-401-615(1), 8/10/11	F S	O&M manual shall be developed, followed, and available to employees and for inspection.	None specified.	The plywood sanding O&M manual shall be kept on file. This file shall be reviewed at least annually with records kept of the date of and personnel who performed such review. Responsible official shall certify that the plywood sander, cyclones, and baghouses, are being operated per the O&M manual. [WAC 173-401-615(1), 8/10/11] The O&M manual shall at a minimum include normal operating parameters for the plywood sander and control equipment; a maintenance schedule; monitoring and record keeping requirements; a description of the monitoring procedures; and actions for abnormal control system operation. [NOC Order No. DE 97AQ-C164, First revision, 5/8/98, Condition 3.3]
6.4.5	NOC Order No. DE 97AQ-C164 First Revision, 5/8/98, Conditions 3.4.3, 3.5.1 WAC 173-401-615(1), 8/10/11	F S	No visible emission shall be allowed beyond the property line.	RM 9, 40 CFR part 60, Appendix A, 7/1/12. [NOC Order No. DE 97AQ-C164 First Revision, 5/8/98, Condition 3.4.3]	The permittee shall conduct monthly visible emissions surveys of the source during daylight hours as follows: a) the survey shall be conducted from a location with a clear view of the source and where the sun is not directly in the observer's eyes. The survey location shall be at least 15 feet but not more than 0.25 miles from the source; b) survey shall be conducted during a production shift; 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 visual observation of the source boundary for evidence of visible emissions; e) in addition to the records required under Condition 3.5, the observer shall record the wind direction, sky condition, sun location with respect to the source and the survey location, and the time duration of the survey. [WAC 173-401-615(1), 8/10/11]
6.4.6	NOC Order No. DE 97AQ-C164 First Revision, 5/8/98, Condition 3.5.3	F	It shall be grounds for recision of NOC Order No. DE 97AQ-C164 if physical operation is discontinued for a period of eighteen (18) months.	None specified.	No additional monitoring required.

	Applicable Requirement (Plywood Sanding)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.4.7	NOC Order No. DE 97AQ-C164 First Revision, 5/8/98, Condition 3.5.6 WAC 173-401-615(1), 8/10/11	F S	Operation of equipment must be conducted in compliance with all data and specifications submitted as part of the NOC application unless otherwise approved by Ecology.	None specified.	A file shall be kept of all plans, specifications, and other information submitted to Ecology relative to NOC Order No. DE 97AQ-C164 First Revision. This file shall be reviewed at least annually. Recordkeeping of the date of and personnel who performed such review. Responsible official shall certify that the plywood sander is operating per the file. [WAC 173-401-615(1), 8/10/11]

6.5 **Process 5: Materials Handling and Storage**

The following requirements apply to MATERIALS HANDLING AND STORAGE:

	Applicable Requirement (Materials Handling and Storage)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.5.1	PCHB No. 89-77 & 89-97, 2/11/90, Condition 3	S	Permittee shall operate an improved telescopic loading spout during barge loading with a maximum drop of five (5) feet existing between the discharge of the spout and the top of the material pile.	None specified.	No additional monitoring required.
6.5.2	PCHB No. 89-77 & 89-97, 2/11/90, Condition 4	S	Permittee shall maintain a windbreak of poplar trees along the Columbia River adjacent to and upwind of chip/sawdust piles.	None specified.	No additional monitoring required.

6.6 **Process 6: New Stud Mill**

The following requirements apply to the NEW STUD MILL:

	Applicable Requirement (New Stud Mill)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.6.1	NOC Order No. 02AQCR-5091, 12/30/02, Conditions 2.3, 2.9.12	F	Employ enclosure of all sawing and wood waste conveying.	None specified.	None required.
6.6.2	NOC Order No. 02AQCR-5091, 12/30/02, Conditions 2.3, 2.8.1, 2.9.12 WAC 173-401-615(1), 8/10/11	F S	All discharges to ambient air from sawing or conveying system shall be controlled by a baghouse with a [PM] control efficiency of ≥ 99%.	RM 5, 40 CFR part 60, Appendix A, 7/1/12. [NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.8.1]	Adhere to "Monitoring, Recordkeeping, and Reporting to be Performed by Permittee," for Condition 6.6.4. [WAC 173-401-615(1), 8/10/11]
6.6.3	NOC Order No. 02AQCR-5091, 12/30/02, Conditions 2.4, 2.7.2 WAC 173-401-615(1), 8/10/11	F S	Total output shall not exceed 150,000,000 board feet of Douglas fir, true fir, or hemlock lumber sawn per 12-month period, calculated quarterly.	None specified.	Quantity of lumber sawn shall be summed monthly, in the following two categories: 1) Douglas fir, true fir, and hemlock, 2) species other than Douglas fir, true fir, or hemlock. [NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.7.2; WAC 173-401-615(1), 8/10/11]
6.6.4	NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.6 WAC 173-401-615(1), 8/10/11	F S	O&M manual shall be developed, kept updated, followed, and available for inspection.	None specified.	The stud mill O&M manual shall be kept on file. This file shall be reviewed at least annually with records kept of the date of and personnel who performed such review. [WAC 173-401-615(1), 8/10/11] The O&M manual shall at a minimum include normal operating parameters for the stud mill and control equipment; a maintenance schedule; monitoring and record keeping requirements; a description of the monitoring procedures; and actions for abnormal control system operation. [NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.6]
6.6.5	NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.9.1 WAC 173-401-615(1), 8/10/11	F S	Odor shall not be detectable beyond the property line.	None specified.	Adhere to "Monitoring, Recordkeeping, and Reporting to be Performed by Permittee," for Condition 6.1.3. [WAC 173-401-615(1), 8/10/11]

	Applicable Requirement (New Stud Mill)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.6.6	NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.9.3	F	Legible copies of NOC Order No. 02AQCR-5091 & the O&M manual shall be on-site in a location known by and available to employees in direct operation of the source.	None specified.	No additional monitoring required.
6.6.7	NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.9.6	F	It shall be grounds for recision of NOC Order No. 02AQCR-5091 if physical operation of the stud mill is discontinued for a period of 18 months or more.	None specified.	No additional monitoring required.
6.6.8	NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.9.8 WAC 173-401-615(1), 8/10/11	F S	Operation of equipment must be conducted in compliance with all data and specifications submitted as part of the NOC application unless otherwise approved by Ecology.	None specified.	A file shall be kept of all plans, specifications, and other information submitted to Ecology relative to NOC Order No. 02AQCR-5091. This file shall be reviewed at least annually. Recordkeeping of the date of and personnel who performed such review. Responsible official shall certify that the stud mill is operating per the file. [WAC 173-401-615(1), 8/10/11]

6.7 **Process 7: Stud Mill Kiln #2**

The following requirements apply to the STUD MILL KILN #2:

	Applicable Requirement (Stud Mill Kiln #2)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.7.1	NOC Order No. 02AQCR-5091, 12/30/02, Conditions 2.3, 2.7.1	F	Use of variable and programmable temperature and fan speed process controls to optimize efficiency.	None specified.	Kiln temperature and relative humidity shall be monitored continuously[2] and recorded. [NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.7.1]
6.7.2	NOC Order No. 02AQCR-5091, 12/30/02, Conditions 2.4, 2.7.1 WAC 173-401-615(1), 8/10/11	F S	Total output shall not exceed 62,466,100 board feet of Douglas fir, true fir, or hemlock dried, calculated on a rolling 12-month basis, unless, site-specific source testing for Stud Mill #2 has been conducted and the results approved by Ecology. If site-specific source testing results have been approved by Ecology, production shall be limited to the quotient of 39 tpy divided by the site-specific VOC emission factor, in terms of board feet produced. [Condition 5.4.1; WAC 173-400-141, 7/11/02; 40 CFR 52.21] (Note: The underlying NOC limits production to 100,135,480 board feet.)	None specified.	Quantity of lumber dried shall be summed monthly, in the following two categories: 1) Douglas fir, true fir, and hemlock, 2) species other than Douglas fir, true fir, or hemlock. [NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.7.1; WAC 173-401-615(1), 8/10/11]

[2] Continuously shall mean 95% of the new dry kiln operation, except for periods of monitoring system down-time, provided that the permittee demonstrates that the down time was not a result of inadequate design, operation, maintenance, or any other reasonably preventable condition, and any necessary repairs to the monitoring system were conducted in a timely manner.

	Applicable Requirement (Stud Mill Kiln #2)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.7.3	NOC Order No. 02AQCR-5091, 12/30/02, Conditions 2.5.1, 2.8.1 WAC 173-401-615(1), 8/10/11	F S	Opacity as calculated by using a six (6) minute averaging time shall not exceed 10%.	RM 9, 40 CFR part 60, Appendix A, 7/1/12. [NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.8.1]	1) The permittee shall conduct monthly visible emissions surveys of the source during daylight hours as follows: a) the survey shall be conducted from a location with a clear view of the source and where the sun is not directly in the observer's eyes. The survey location shall be at least 15 feet but not more than 0.25 miles from the source; b) survey shall be conducted during a production shift; 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 15 second visual observation of stud mill kiln #2 exhaust; e) in addition to the records required under Condition 3.5, the observer shall record the wind direction, sky condition, sun location with respect to the source and the survey location, and the time duration of the survey. 2) The permittee shall conduct RM 9 testing of an emission unit when visible emissions are observed during a survey or are otherwise observed by the permittee. Testing shall be conducted as follows: a) testing shall be initiated as soon as possible, but not later than 24 hours after the requirement to conduct such testing is triggered; b) all testing shall be performed during periods when the subject emission unit is operating; c) testing shall consist of certified opacity readings at 15 second intervals over a minimum period of six consecutive minutes (24 consecutive readings). [WAC 173-401-615(1), 8/10/11]
6.7.4	NOC Order No. 02AQCR-5091, 12/30/02, Conditions 2.5.2, 2.8.1 WAC 173-401-615(1), 8/10/11	F S	VOC emissions shall not exceed 7.8 lb/hr	RM 25 or 18 (as terpene), 40 CFR part 60, Appendix A, 7/1/12 or alternate methods proposed in writing by the permittee and approved by Ecology in advance of the testing. Test plan submitted 30 days prior to test. [NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.8.1]	Adhere to "Monitoring, Recordkeeping, and Reporting to be Performed by Permittee," for Condition 6.7.6. [WAC 173-401-615(1), 8/10/11]

	Applicable Requirement (Stud Mill Kiln #2)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.7.5	NOC Order No. 02AQCR-5091, 12/30/02, Conditions 2.5.3, 2.8.1 WAC 173-401-615(1), 8/10/11	F S	PM emissions shall not exceed 1.1 lb/hr	RM 1, 2, 3, 4, and 5, 40 CFR part 60, Appendix A, 7/1/12. RM 202, 40 CFR part 51, Appendix M, 7/1/12 or alternate methods proposed in writing by the permittee and approved by Ecology in advance of the testing. Test plan submitted 30 days prior to test. [NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.8.1]	Adhere to "Monitoring, Recordkeeping, and Reporting to be Performed by Permittee," for Condition 6.7.6. [WAC 173-401-615(1), 8/10/11]
6.7.6	NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.6 WAC 173-401-615(1), 8/10/11	F S	O&M manual shall be developed, kept updated, followed, and available for inspection.	None specified.	The dry kiln O&M manual shall be kept on file. This file shall be reviewed at least annually with records kept of the date of and personnel who performed such review. [WAC 173-401-615(1), 8/10/11] The O&M manual shall at a minimum include normal operating parameters for the dry kiln and control equipment; a maintenance schedule; monitoring and record keeping requirements; a description of the monitoring procedures; and actions for abnormal control system operation. [NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.6]
6.7.7	NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.9.1 WAC 173-401-615(1), 8/10/11	F S	Odor shall not be detectable beyond the property line.	None specified.	Adhere to "Monitoring, Recordkeeping, and Reporting to be Performed by Permittee," for Condition 6.1.3. [WAC 173-401-615(1), 8/10/11]
6.7.8	NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.9.3	F	Legible copies of NOC Order No. 02AQCR-5091 & the O&M manual shall be on-site in a location known by and available to employees in direct operation of the source.	None specified.	No additional monitoring required.

	Applicable Requirement (Stud Mill Kiln #2)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.7.9	NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.9.6	F	It shall be grounds for recision of NOC Order No. 02AQCR-5091 if physical operation of the dry kiln is discontinued for a period of 18 months or more.	None specified.	No additional monitoring required.
6.7.10	NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.9.8 WAC 173-401-615(1), 8/10/11	F S	Operation of equipment must be conducted in compliance with all data and specifications submitted as part of the NOC application unless otherwise approved by Ecology.	None specified.	A file shall be kept of all plans, specifications, and other information submitted to Ecology relative to NOC Order No. 02AQCR-5091. This file shall be reviewed at least annually. Recordkeeping of the date of and personnel who performed such review. Responsible official shall certify that the dry kiln is operating per the file. [WAC 173-401-615(1), 8/10/11]
6.7.11	NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.9.11	F	No heating source other than steam shall be used to heat the dry kiln.	None specified.	No additional monitoring required.

6.8 **Process 8: Debarker**

The following requirements apply to the DEBARKER:

	Applicable Requirement (Debarker)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.8.1	NOC Order No. 02AQCR-5091, 12/30/02, Conditions 2.4, 2.7.3 WAC 173-401-615(1), 8/10/11	F S	Total logs debarked shall not exceed 1,450,000 tons of logs per 12-month period, calculated quarterly.	None specified.	Quantity of logs debarked, measured in tons of logs, shall be summed monthly. [NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.7.3; WAC 173-401-615(1), 8/10/11]
6.8.2	NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.6 WAC 173-401-615(1), 8/10/11	F S	O&M manual shall be developed, kept updated, followed, and available for inspection.	None specified.	The debarker O&M manual shall be kept on file. This file shall be reviewed at least annually with records kept of the date of and personnel who performed such review. [WAC 173-401-615(1), 8/10/11] The O&M manual shall at a minimum include normal operating parameters for the debarker and control equipment; a maintenance schedule; monitoring and record keeping requirements; a description of the monitoring procedures; and actions for abnormal control system operation. [NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.6]
6.8.3	NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.9.3	F	Legible copies of NOC Order No. 02AQCR-5091 & the O&M manual shall be on-site in a location known by and available to employees in direct operation of the source.	None specified.	No additional monitoring required.

6.9 **Process 9: Logyard**

The following requirements apply to the LOGYARD:

	Applicable Requirement (Logyard)	Enforceability (Federal = F, State = S)	Description (for clarification purposes only, enforceable as cited under 'applicable requirement')	Monitoring and Analysis Procedure or Test Method	Monitoring, Recordkeeping, and Reporting to be Performed by Permittee
6.9.1	NOC Order No. 02AQCR-5091, 12/30/02, Condition 2.9.13 WAC 173-401-615(1), 8/10/11	F S	Fugitive dust shall be controlled with an [PM] efficiency ≥ 90%.	RM 9, 40 CFR part 60, Appendix A, 7/1/12. [WAC 173-401-615(1), 8/10/11]	Logyard dust shall be suppressed by application of an adequate volume of water or chemical dust suppressant, on a frequency such that application is apparent at all times. [WAC 173-401-615(1), 8/10/11]

7.0 INAPPLICABLE REQUIREMENTS

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

Inapplicable Requirement	Title	Explanation
FCAA Section 183(e)	Federal Ozone Measures - Control of Emissions from Certain Sources	Source is not located in a designated ozone nonattainment area.
FCAA Section 183(f)	Federal Ozone Measures - Tank Vessel Standards	Source includes no 'tank vessels'.
FCAA Section 328	Air Pollution from Outer Continental Shelf Activities	Not an 'outer continental shelf' source.
FCAA Title IV	Acid Deposition Control	Not an 'affected source'.
40 CFR part 50	National Primary and Secondary Ambient Air Quality Standards	Excluded from definition of "applicable requirement" by WAC 173-401-200(4)(xii) because permittee is not a temporary source.
WAC 173-400-050(2)	Emission standards for incineration units	Source is not within category to which requirement applies.
WAC 173-400-070(1), (3), (4), (5), (6), (7), (8)	Emission standards for certain source categories	Source is not within category to which requirement applies.
WAC 173-400-105(5)(a), (b), (c)	Continuous monitoring and recording	Source is not within category to which requirement applies.
WAC 173-400-115	Standards of performance for new sources	Source is not within categories to which requirement applies.
WAC 173-400-151	Retrofit requirements for visibility protection	Source emits < 250 tpy of each pollutant.
WAC 173-400-210	Emission requirements of prior jurisdictions	No prior authority.
WAC 173-422	Motor Vehicle Emission Inspection	Source is not in an emissions contributing area.
WAC 173-430	Agricultural Burning	Source performs no agricultural burning.
WAC 173-433	Solid Fuel Burning Devices	Source is not within category intended to be regulated.
WAC 173-434	Solid Waste Incinerator Facilities	Source is not within category to which requirement applies.
WAC 173-470	Ambient Air Quality Standards for Particulate Matter	Applicable if triggered.
WAC 173-474	Ambient Air Quality Standards for Sulfur Oxides	Applicable if triggered.
WAC 173-475	Ambient Air Quality Standards for CO, Ozone, and NO_2	Applicable if triggered.
WAC 173-480	Ambient Air Quality Standards and Emission Limits for Radionuclides	Source does not emit radionuclides.
WAC 173-490	Emission Standards and Controls for Sources Emitting VOCs	Source is not located in a designated ozone nonattainment area.
WAC 463-39	General Regulations for Air Pollution Sources	Source not under the Energy Facility Site Evaluation Council (EFSEC) jurisdiction.
RCW 70.94.610	Burning used oil fuel in land-based facilities	Used oil burned in 0.5 MMBtu/hr burner.
RCW 70.94.743	Outdoor burning	Source not located in a prohibited area.
Order No. DE 74-744	Regulatory Order (fractionator and pneumatic conveyance system)	Conditions completed with no ongoing requirements.
Order No. DE 77-435	Notice of Construction (hog fuel fired boiler)	Rescinded by Order No. DE 80-184.

Inapplicable Requirement	Title	Explanation
Order No. DE 80-594	Notice of Construction (woodwaste fired boiler)	Rescinded by Order No. DE 97AQ-C165.
Order No. DE 85-514	Compliance Order (control of fugitive dust emissions)	Dismissed by PCHB 86-93 and 86-95.
Order No. DE 86-523	Compliance Order (cover fine wood materials)	Superseded by PCHB 86-93 and 86-95.
Order No. DE 89-C105	Compliance Order (PCHB 86-93, 86-95 intermediate-term measures)	Superseded by PCHB 89-77 and 89-97
Order No. DE 94 AQ-C193	Regulatory Order (limit hog fuel boiler during Klickitat Energy Project operation)	Rescinded by Order No. DE 98 AQ-C123.
PCHB No. 86-93 & 86-95,	Stipulated Compliance Schedule and Order of Dismissal (sawdust control measures)	Superseded by PCHB 89-77 and 89-97.
PCHB No. 89-77 & 89-97, Condition 6	Stipulated Compliance Schedule and Order of Dismissal (ambient PM monitoring)	In 2000, Ecology determined that it was unreasonable to require outdated monitoring of an outdated problem.
No. PSD-X82-02	Prevention of Significant Deterioration (15-MW coal & wood-fired boiler and turbine)	Order VOID since not constructed within 18 months of approval.
Order No. 07AQ-C061, 9/30/07, Condition 2.3.1	Synthetic Minor Order (limits facility-wide HAP emissions below major source thresholds)	Source did not submit any plans, specifications, or other information to Ecology relative to Order No. 07AQ-C061.
40 CFR Part 60 Subpart CCCC	Standards of Performance for Commercial and Industrial Solid Waste Incineration Units	The hog fuel boiler combusts traditional fuels, clean cellulosic biomass, resinated wood scraps from facilities operations, and incidental quantities of natural gas, not solid waste.
40 CFR Part 60 Subpart DDDD	Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units	Source is not within category intended to be regulated, administrators of air quality programs.
40 CFR Part 63, Subpart DDDD	Plywood and Composite Wood Products MACT	Facility-wide HAP emissions are below 10/25 tpy applicability threshold.
40 CFR Part 63, Subpart DDDDD	Industrial/Commercial/Institutional Boiler and Process Heater MACT	Facility-wide HAP emissions are below 10/25 tpy applicability threshold.
40 CFR Part 63, Subpart HHHHHH	National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources	Permittee does not use methylene chloride for paint stripping. All spray coating applications meet the definition of facility maintenance in 40 CFR §63.11180, 7/1/08.
40 CFR Part 241	Solid Wastes Used as Fuels or Ingredients in Combustion Units, the "Non-Hazardous Secondary Materials (NHSM) Rule"	Subpart A of the NHSM Rule defines the fuels combusted in the hog fuel boiler and waste oil burner as traditional and alternative fuels respectively, not solid wastes.