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AIR OPERATING PERMIT No. 000080-9

In compliance with the provisions of The State of Washington
Clean Air Act Chapter 70.94 Revised Code of Washington

Weyerhaeuser Company
Cosmopolis Pulp Mill
1701 Front Street
P. O. Box 1000
Cosmopolis, Washington 98537

is authorized to operate in accordance
with the terms and conditions
of this permit.

Issued by:

State of Washington
DEPARTMENT OF ECOLOGY
300 Desmond Drive
P.O. Box 47600
Olympia, Washington 98504-7600

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INTRODUCTION AND LEGAL AUTHORITY

This Air Operating Permit is described under the Operating Permit Regulation, Chapter 173-401 WAC. The provisions of this permit describe the emissions limitations, operating requirements, monitoring and recording requirements, and reporting frequencies for the permitted source.

Weyerhaeuser Company at Cosmopolis, Washington requires a Title V Air Operating Permit because it emits or has the potential to emit, one hundred tons or more, each year, of one or more regulated air pollutants [WAC 173-401-300(1)].

Compliance with underlying requirements shall be demonstrated using the methods specified in this permit. The permittee shall submit a report of compliance certification of the terms and conditions contained in this permit as required in General Condition 39, including the Permittee's certification of compliance with all applicable requirements.

The Title V Air Operating Permit consists of all parts of this assembled document including all Appendices, but does not include the accompanying Support Document, nor the Title V permit application materials submitted by Weyerhaeuser Company's Cosmopolis pulp mill, nor any other past orders or permits.

The definition of terms contained in WAC 173-401-200, and defined in all referenced regulations, apply to this permit unless otherwise defined in the permit. All terms and conditions except state-only requirements, are enforceable under the Federal Clean Air Act (FCAA). State-only requirements are specifically identified in the permit.

EMISSION UNIT SPECIFIC REQUIREMENTS [WAC 173-401-600]

The emission units covered by conditions A through G are subject to the following emission limits, monitoring, and reporting requirements. These units are also subject to the facility-wide applicable requirements and the associated monitoring, recordkeeping and reporting requirements for these limits, in the Facility-Wide section of this permit. The permittee may use an equivalent method—after obtaining prior written approval from Ecology.

Unless specified otherwise, the basis of authority for the type and frequency of monitoring imposed in conditions A through G, is WAC 173-401-615 or 630(1). All conditions in A through G are enforceable under the federal Clean Air Act, except those noted as **state only**.

Insignificant emission units (IEUs) subject to requirements contained in the Facility-Wide section, however are not subject to testing, monitoring, recordkeeping, reporting or certification requirements unless the generally applicable requirements in the State Implementation Plan (SIP) impose them.
[WAC 173-401-530(2)(c)].

Refer to Permit Appendix C for emission estimate algorithms. The reference test method (RM) or compliance determination algorithm is identified in the column titled "Monitoring and Reporting". These algorithms set forth the manner by which emissions are calculated for those requirements for which the Reference Method itself does not directly result in an emissions estimate. The permittee may use an equivalent method with prior written approval obtained from Ecology.

A. Recovery Boilers No. 1, No. 2, and No. 3 Common Stack (AP-10)

	Parameter	Limit Shall not exceed	Monitoring & Reporting	Applicable Requirements
1.	Particulate	0.10 gr/dscf @ 8 % O_2	The permittee shall perform DOE Method 5 source test and record results once per quarter. Testing frequency shall return to monthly --if the test shows the limit was exceeded-- until four tests are below 80 % of limit. The permittee shall perform the DOE Method 5 source test in any quarter when pulp production reaches above 80 % of the previous one month's pulp production. The permittee shall report the results of the DOE Method 5 source test on its monthly air emissions report. See Permit Section A.4 (below) for the operational requirement intended to indicate compliance. The averaging time is the time that each test is run in order to obtain the required volume of sample. The minimum averaging time is 60 consecutive minutes.	[WAC 173-410-040(2)(a)] and [Order No. DE 95AQ-I034 (Attachment B)]
2.	Opacity	Average 35 % or less for any six (6) consecutive minutes in any one-hour period.	DOE Method 9B is the reference test method. See Permit Section A.4 (below) for operational requirements	[WAC 173-410-040(3)] and [Order No. DE 95AQ-I034 (Attachment B)]
3.	Sulfur dioxide[1]	800 ppm hourly average	The permittee shall continuously monitor the concentration of sulfur dioxide from the recovery stack, using test procedures outlined in 40 CFR, Part 60, Appendix B, Performance Specification 2; and using the quality assurance procedures outlined in 40 CFR, Part 60, Appendix F. The sulfur dioxide values shall be averaged on an hourly basis. The daily hourly averages shall start on the clock hour at 0000 hours and end at 2400 hours. The emission data shall be submitted in the permittee's monthly air emissions report.	[WAC 173-410-040(d)], 40 CFR 64, and [WAC 173-401-615(4)]

4	Operation See A1 and A2 above	--	**Operational Requirement:** The permittee shall operate the recovery furnaces system absorption tower's circulation pumps continuously, except during pump maintenance, to indicate that the pollution control device is operating properly. During any maintenance shutdown, one of the pumps may be out of service for periods no greater than 72 hours. The permittee will be in violation of the permit, if more than one of the pumps is out of service at any one time or if the non-operating pump is out of service for longer than 72 hours. The absorption tower circulating pump's operation requirement applies only when burning spent sulfite liquors and/or wastewater treatment secondary sludges, in recovery furnaces No. 1, No. 2, and/or No. 3. Once per shift the operator shall take visual readings and record how many pumps are in service. Failure to take corrective actions to bring the operation back into its expected operational range within 72 hours would violate the rule WAC 173-410-040(4) and may also violate the underlying requirement.	[Order No. DE 95AQ-I034 (Attachment B)]; [WAC 173-410-040(4)] and [WAC 173-410-062(5)]

Concentrated oxygen extraction liquor/Recovery furnaces No. 1 and No. 2 (AP-10)				
	Parameter	Limit Shall not exceed	Monitoring & Reporting	Applicable Requirements
5	Burning NCG's gasses	Directed to Recovery boiler No 1 and No. 2 except during startup, shutdowns, or emergencies. During shutdown of one boiler, the NCG shall be routed to the operational boiler within one hour.	For safety reasons, during startup and emergency shutdowns, the NGG gasses may be vented to the cooling towers until the gases can be rerouted to the boiler(s). Records shall be maintained showing NGC combustion status and boiler maintenance or emergency shutdown activities that interrupt NCG combustion. All NCG bypasses shall be recorded. All bypasses of NCG gasses longer than one hour shall be reported with the monthly air report.	[Order No. 96AQ-I089 (Approval conditions A and B)] issued per [WAC 173-400-113]
	Weak Oxygen Storage Tank (EV-21) and the COEL Storage Tank (EV-22)	--	Minimum record keeping: The permittee shall keep records of the dimensions and the analysis showing the capacity of the Weak Oxygen Storage Tank (EV-21) and of the COEL Storage Tank (EV-22) for the life of the vessels.	[40 CFR §60.116b. (a) and (b)]

The following **state-only** requirements are not federally enforceable under the federal Clean Air Act:

	Parameter	Limit Shall not exceed	Monitoring & Reporting	Applicable Requirements
6.	Sulfur dioxide[1]	Average 360 ppm per hour.	See A3 for monitoring requirements.	[DE 95AQ-I034 (Attachment B)]
7.	TRS[1]	17.5 ppm	The permittee shall continuously monitor and record the concentration of total reduced sulfur (TRS) compounds in the recovery furnace stack emission, as outlined in [40 CFR, Part 60, Appendix B, Performance Specification 5] and as prescribed by the quality assurance procedures outlined in [40 CFR, Part 60, Appendix F]. The averaging period is daily. The permittee shall report the results of the monitoring to Ecology on its monthly emission report form.	[WAC 173-410-040(5)]

B. Hogged fuel dryer - (HD-14) MACT II requirements

	Parameter	Limit Shall not exceed	Monitoring & Reporting	Applicable Requirements
a.	Opacity	Average 20 % for any consecutive three (3) minutes period for any one hour	DOE test method 9 A is the referenced test method. The opacity shall be monitored yearly. See B.2.iv - B.2.vi for minimum operating requirements intended to indicate compliance with the opacity limit.	WAC 173-400-040(1) and [Order No. DE 95AQ-I034 (Attachment B)]
b	Particulate	0.10 gr/dscf	Compliance test performed under c(i) below is compliance with the 0.10 gr/dscf limit.	[Order No. DE 03AQIS-5813] [40 CFR Part 63.862(d) and 865(b)(1)] WAC 173-400-075(5) incorporates MACT by reference.

c.	Verification Of Compliance And Records			
i	Particulate	≤ 10 lbs./hr	The permittee must perform a compliance test, using the test methods specified in the NESHAP, to demonstrate that the PM from the hogged fuel dryer meets the standard during the fifth year of the permit. The permittee shall send the PM stack test results to Ecology with the permit renewal application.	40 CFR 63.865 WAC 173-400-075(5) incorporates MACT by reference. [Order No. DE 03AQIS-5813]
ii	Record keeping[1]	--	The permittee shall continuously monitor the performance of the fabric filter, using a bag leak detection system with audible alarm system.	[Order No. DE 03AQIS-5813] [40 CFR Part 63.864(12)(iv)] WAC 173-400-075(5) incorporates MACT by reference.
iii	Record keeping	--	The permittee must develop and implement a written startup, shutdown, and malfunction plan that contains specific procedures to be followed for operating and maintaining the hogged fuel dryer or fabric filter during periods of startup, shutdown, and malfunction, and a program of corrective action if the hogged fuel dryer or fabric filter malfunction.	40 CFR 63.866(a) WAC 173-400-075(5) incorporates MACT by reference. [Order No. DE 03AQIS-5813]
iv	Record keeping	--	The permittee must take corrective action as specified in its startup, shutdown, and malfunction plan whenever the bag leak detection alarm sound.	40 CFR 63.864(1)(k)(iv) WAC 173-400-075(5) incorporates MACT by reference. [Order No. DE 03AQIS-5813]
v	Record keeping	--	The permittee shall record each alarm, the time of the alarm, the time corrective action was initiated and completed, a brief description of the cause of the alarm, and the corrective action taken.	40 CFR 63.866(c)(7) WAC 173-400-075(5) incorporates MACT by reference. [Order No. DE 03AQIS-5813]

vi	Record keeping	--	The permittee will be in violation of the alternative standard if corrective action is not initiated within one (1) hour of a bag leak detection alarm; if corrective action is not completed in accordance with the startup, shutdown, and malfunction plan; or if the alarm is engaged for more than five (5) percent of the total operating time during a six (6) month block reporting period. In calculating the operating time fraction, if inspection of the fabric filter demonstrates that no corrective action is required, no alarm time is counted; if corrective action is required, each alarm is counted as a minimum of 1 hour; if corrective action is not initiated within 1 hour, the alarm time is counted as the actual amount of time taken to initiate corrective action. The requirements are as follows: 1. The particulate alarm levels will be averaged on an hourly basis. 2. Corrective action commence after the average particulate alarm level is more that 50 % of scale. A bag house visual inspection will be conducted at first opportunity when the Dryer is down, if indication of a damage bag. 3. The time charged toward the 5 % of the total operating time to initiate corrective actions for the six month reporting period will begin after the hourly average is over 50 % of scale.	40 CFR 63.864(2)(k)(v) WAC 173-400-075(5) incorporates MACT by reference. [Order No. DE 03AQIS-5813]
vii	--	--	The compliance with the alternative standard for the hogged fuel dryer is compliance with 40 CFR 63 subpart MM for the HAPs emission requirements for the recovery boiler stack emissions.	40 CFR 63.860(b)(5) WAC 173-400-075(5) incorporates MACT by reference. [Order No. DE 03AQIS-5813]

viii	Record keeping	--	The permittee must install, calibrate, maintain, and operate each triboelectric bag leak detection system -- or equivalent system -- according to the “Fabric Filter Bag Leak Detection Guidance" (EPA-454/R-98-015, September 1997). This document is available from the U.S. Environmental Protection Agency (U.S. EPA); Office of Air Quality Planning and Standards; Emissions, Monitoring and Analysis Division; Emission Measurement Center, MD-D205-02, Research Triangle Park, NC 27711. This document is also available on the Technology Transfer Network under Emission Measurement Center Continuous Emission Monitoring. The owner or operator must install, calibrate, maintain, and operate other types of bag leak detection systems in a manner consistent with the manufacturer's written specifications and recommendations.	40 CFR 63.864(d)(12)(i) WAC 173-400-075(5) incorporates MACT by reference. [Order No. DE 03AQIS-5813]
ix	Record keeping	--	Following initial adjustment of the system, the sensitivity or range, averaging period, alarm set points, or alarm delay time may not be adjusted--except as detailed in the site-specific monitoring plan. In no case may the sensitivity be increased by more than 100 percent nor decreased by more than 50 percent over a 365-day period --unless such adjustment follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating condition. The permittee must record each adjustment.	40 CFR 63.864(d)(12)(x) WAC 173-400-075(5) incorporates MACT by reference. [Order No. DE 03AQIS-5813]
x	Record keeping	--	The permittee must record the results of each inspection, calibration, and validation check.	40 CFR 63.864(d)(12)(xi) WAC 173-400-075(5) incorporates MACT by reference. [Order No. DE 03AQIS-5813]

d. Sulfur content of fuel oil				
	Sulfur dioxide	1,000 ppm uncorrected for oxygen 2 % sulfur in fuel oil	The permittee shall certify to Ecology annually --on the January monthly air emission reporting form-- that only diesel was burned during the preceding year. In the event that fuel oil is burned, the permittee shall certify that the fuel oil burned had a sulfur content of no greater than two percent.	WAC 173-410(1)(f) and [Order No. DE 95AQ-I034 (Attachment B)]

C. Hogged fuel boiler (Power boiler) (PH-34 & PH-42)

	Parameter	Limit (Shall not exceed)	Monitoring & Reporting	Applicable Requirements
1.	Sulfur dioxide	1,000 ppm @ 7 % O_2 2 percent sulfur in fuel oil	The permittee shall record the sulfur content of the fuel oil being burned in the hogged fuel boiler on each delivery, and shall certify to Ecology annually --on the January monthly air emission reporting form-- that each delivery for the preceding year had a sulfur content of no greater than two percent.	[WAC 173-410-040(1)(f)] and [Order No. DE 95AQ-I034 (Attachment B)]
2.	Opacity	Average 20 % for any three (3) minutes period, within any one hour period --except for soot blowing	DOE test method 9 A is the referenced test method. See C.4 for operational requirement. The operational requirement is intended to indicate compliance with the opacity limit.	WAC 173-400-040(1) and [Order No. DE 95AQ-I034 (Attachment B)]
3.	Particulate	0.1 gr/dscf @ 7 % O_2	DOE test method 5 shall be performed once per year. The permittee shall perform the Method 5 source test while steam production is above 80 % of the previous month's steam production. The averaging time is the time that each test is run in order to obtain the required volume of sample. The minimum averaging time is sixty (60) minutes. The permittee shall record and report the results of the particulate testing by DOE method 5 to Ecology once per year -- in January for the previous year. See C.4 (below) for the operational requirement intended to indicate compliance with the particulate limit.	[WAC 173-410-040(2)(c)(iii)] and [Order No. DE 95AQ-I034 (Attachment B)]

4.	Operation See C2 and C3 above[1]	--	**Operational Requirement:** The permittee shall continuously monitor and record flow and pressure drop across the hogged fuel boiler's scrubber. The hogged fuel boiler scrubber's flow and pressure drop (delta p), while burning hog fuel, shall be maintained greater than or equal to 605 gallon/minute and 10 inches of water, respectively, except as provided below. When the hogged fuel boiler scrubber is shut down for any reason, the emission shall continue to meet the 20 % opacity limitation. The Permittee shall provide to Ecology, within thirty days of the effective date of the permit, the mill's soot blowing schedule. **Corrective Action Requirement**: When the Permittee encounters conditions that do not meet the Operational Requirement above, Permittee shall, within the shortest practical time but no longer than four hours, take Corrective Action --or the Permittee may perform the applicable DOE test method. The permittee shall report all instances where the facility operates without meeting the Operational Requirement, and shall report any Corrective Action taken, on the facility's monthly air emissions report. Ecology does not require the permittee to report instances where the scrubber's minimum Operational Requirement is exceeded for less than 3 minutes during any one-hour period. Failure to take corrective actions violates WAC 173-410-040(4) and may also be a violation of the underlying requirement.	WAC 173-410-040(4), Order No. DE 95AQ-I034 (Attachment B), 40 CFR 64, and WAC 173-401-615(4)
5	40 CFR Part 63 Subpart DDDDD is adopted by reference into the proposed permit and becomes an applicable requirement on September 13, 2007 with the emissions limits, work practice standards, and operating limits. The new owner must show compliance within 180 calendar days after startup[2].			WAC 173-400-075(5) incorporates MACT by reference. [40 CFR Part 63 Subpart DDDDD]

D. Oxygen Blow tank vent (BP6)

	Parameter	Limit Shall not exceed	Monitoring & Reporting	Applicable Requirements
1.	Volatile organic compounds	34 tons VOC on a carbon basis /year	The permittee shall perform on at least an annual basis, EPA Method 25 A Modified, to confirm the emission factors of VOC per ton of production. EPA method 25A Modified is the NCASI methanol (VOC) method. The permittee shall report the results of EPA Method 25 A Modified, and the yearly pulp production rate, on the January monthly report. See D.2 for minimum operating/record keeping condition. Annual emissions (ton VOCc/year) = sum of annual production (ADUT/year) * emission factor (lbs VOC/ADUT)*ton/2000 lbs. Emission factor (lbs VOC/ADUT) = concentration (mgC/L)*28.32 L/CF*gm/1000 mg*lb/454 gm* air flow by EPA Method 2 (CF/minute) *60 minutes/hour/ production (hour/ADUT)	[Order No. 94AQ-I018 (Approval conditions (1))] issued per WAC 173-400-113
2.	Record keeping	--	Minimum record keeping for VOC: The permittee shall monitor the amount of unbleached pulp produced, in air dried tons per day, and shall report the average daily production for the reporting month on the monthly air emissions report form. The daily production of pulp shall be used as a minimum operational parameter for VOC emissions.	[WAC 173-410-062(2)(b)] and [Order No. 94AQ-I018(Approval condition (2)] as prescribed under WAC 173-400-113

E. Blow system emission - Nuisance Tower (DB-26) ---

	Parameter	Limit Shall not exceed	Monitoring & Reporting	Applicable Requirements
1.	Sulfur dioxide	0.2 lbs./ADUT on a fifteen-minute average	The permittee shall monitor sulfur dioxide using DOE method 6 modified source test, once per month. "Modified" means that the source test is time-adjusted for the average duration of one digester dump--about 15 minutes. The Modified DOE method 6 results, divided by the corresponding digester pulp production, determines the sulfur dioxide emissions per ADUT. The total tons of pulp shall be based on the tons of unbleached pulp per digester dump. See E.2 (below) for operational requirements. The production of pulp during the digester dump shall be taken, recorded, and the amount reported to Ecology with the test results.	WAC 173-410-040(1)(c)
2.	Operation See E1 above[1]	--	**Operational Requirement:** The permittee shall continuously monitor and record flow to the nuisance tower scrubber. The nuisance scrubber's media flow shall be maintained at a rate greater than or equal to 150 gallons/minute averaged over fifteen minutes. **Corrective Action Requirement:** When the permittee encounters conditions that do not meet the Operational Requirement above, the permittee shall take Corrective Action within the shortest practical time, or as soon as arrangements can be made --but not longer than one hour-- the Permittee may perform the applicable DOE test method. The Permittee shall report all instances where the facility operates without meeting the Operational Requirement, and report the Corrective Action taken, on the facility's monthly air emissions report. Failure to take corrective actions violates WAC 173-410-040(4) and may also be a violation of the underlying requirement.	WAC 173-410-040(4), 40 CFR 64, and WAC 173-401-615(4)

F. Mill emission (All emissions from mill except emissions from the power boiler)

	Parameter	Limit Shall not exceed	Monitoring & Reporting	Applicable Requirements
1.	Sulfur dioxide	20 lbs./ day/ADUT	The operator shall calculate the daily average mill emission using the algorithm defined in Permit Appendix C. The permittee shall record and submit the averages on its monthly air emissions report. Each unit's total counted toward the limit shall measure output of more than one ton of sulfur dioxide per year. The production rate shall be reported as the monthly average for each month. The permittee must measure production as in section D2 above. The pounds of sulfur dioxide produced shall be measured as the daily average. The flow used in these calculations shall be the flow rate measured during stack testing each month, using DOE method 2. The moisture content shall not exceed the saturation value measured at the stack temperature.	WAC 173-410-040(1)(a) and [Order No. DE 95AQ-I034 (Attachment B)]

G. MACT I requirements

G.1 General and SSMP requirements

	Parameter	Limit Shall not exceed	Monitoring and Reporting	Applicable Requirement(s)
i	Operation	-	The permittee shall operate and maintain the emission unit subject to the MACT standard, and its associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions--at least to the levels required by all relevant standards.	[40 CFR Part 63, §63.6(e)(1)(i)] and WAC 173-400-075(5)
ii	-	-	The permittee shall prepare and implement a Startup, Shutdown, and Malfunction Plan (SSMP), for each of the emission units subject to a MACT standard, by the applicable compliance date for each MACT source. The SSMP shall be prepared in accordance with 40 CFR 63.6(e). The SSMP shall be located at the mill site and shall be updated as needed. When the SSMP is updated, Weyerhaeuser shall retain copies of each previous version of the SSMP for a period of 5 years.	[40 CFR Part 63, §63.6(e)(3)(i) and (v)] and WAC 173-400-075(5)
iii	Records	-	The permittee shall correct malfunctions--as soon as practicable after their occurrence--in accordance with the startup, shutdown, and malfunction plan.	[40 CFR Part 63, §63.6(e)(1)(ii)] and WAC 173-400-075(5)
iv	Operation	-	During periods of startup, shutdown, and malfunction, the permittee shall	[40 CFR Part 63,

			operate and maintain the source (including associated air pollution control equipment) in accordance with the procedures specified in the Startup, Shutdown, and Malfunction Plan.	§63.6(e)(3)(ii)-(iii)] and WAC 173-400-075(5)
v	Record keeping	-	The permittee shall maintain records of all information required by this section of the permit, in a form suitable and readily available for expeditious inspection and review. The records shall, at a minimum, contain the information described in 40 CFR § 63.10(b)(2). Records shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, or report.	[40 CFR Part 63, §63.10(b)(1)] and WAC 173-400-075(5)
vi	Reporting requirement	-	Startup, shutdown, and malfunction reports shall be submitted only if there is an occurrence of a startup, shutdown, or malfunction event resulting in excess emissions during the reporting month and shall be delivered or postmarked by the 15th day following the end of each reporting month.	[40 CFR Part 63, §63.10(d)(5)(i)] and WAC 173-400-075(5)
vii	Record keeping	-	If the permittee deviates from the startup, shutdown, and malfunction plan (SSMP) during a startup, shutdown, or malfunction event, mill operators shall record the actions taken for that event. Report such actions within two (2) working days after commencing actions inconsistent with the plan, followed by a letter within seven (7) working days after the end of the event. The report shall contain the name, title, and signature of a responsible official who is certifying its accuracy, explaining the circumstances of the event, the reasons for not following the SSMP, and whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred.	[40 CFR Part 63, §63.6(e)(3)(iv) and §63.10(d)(5)(ii)] and WAC 173-400-075(5)
viii.	-		The permittee shall comply with applicable requirements prescribed in 40 CFR Part 63, Subpart A, Sections §63.6, §63.7, §63.8, §63.9, and §63.10.	40 CFR 63, §63.440(g) and WAC 173-400-075(5)
ix	-		Startup, shutdown, and malfunction plan is incorporated by reference into the Title V permit.	40 CFR 63.6(e)(3)(i) and WAC 173-400-075(5)
x	Reporting	-	Attached letter of occurrences of periodic startup, shutdown, and malfunction reports to the monthly air report quarterly	[40 CFR 63.10(d)(5)(i)] WAC 173-400-075(5)

G.2 MACT I - EMISSION UNIT SPECIFIC REQUIREMENTS - SULFITE PULPING SYSTEM SOURCE GROUP

G.2.A. Controls

		Condition	Monitoring and reporting	Applicable Requirement(s)
1	Methanol	**E**mit no more than 1.1 kilograms of total HAPs or methanol per megagram (2.2 pounds per ton) of ODP.	Perform EPA Method 308 on digester system vents, evaporator system vents, and each pulp washing system vent as defined in Appendix A to [40 CFR 63 Subpart S]. Method 1 or 1A shall be used to determined the sampling site. Method 2, 2A, 2C, or 2D of 40 CFR Part 60 Appendix A shall be used to determined the flow rate and Method 4 of [40 CFR Part 60 Appendix A] to determined the moisture content. A compliance test shall be preformed in the fifth year of the permit cycle with three individual runs, each lasting 60 minutes minimum. Report results on the monthly air report.	40 CFR 63.444(c)(1), 40 CFR §63.444(c)(2)(i) and WAC 173-400-075(5)

G.2.B. Inspection Requirements

	Parameter	Condition or Limit	Monitoring and reporting	Applicable Requirement(s)
i.	Inspection		For each enclosure opening, a visual inspection of the closure mechanism shall be performed at least once every 30 days to ensure the opening is maintained in the closed position and sealed.	[40 CFR Part 63, §63.453(k)(1)] WAC 173-400-075(5)
ii.	Inspection		The visible inspection shall focus on ductwork, piping, enclosures, and connections to covers—to discover any visible evidence of defects-- every 30 days or as requested by the Department.	40 CFR 63.453(k)(2) WAC 173-400-075(5)
iii.	Inspection		The permittee shall demonstrate initially and annually that each enclosure opening is maintained at negative pressure as specified in the Code of Federal Rules [40 CFR Part 63, §63.457(e)].	40 CFR Part 63.453(k)(4) WAC 173-400-075(5)
iv.	Inspection		The valve or closure mechanism specified in §63.450(d)(2) shall be inspected at least once every 30 days, to ensure that the valve is maintained in the closed position and that the emission point gas stream is not diverted through the bypass line.	40 CFR 63.453(k)(5) WAC 173-400-075(5)

G.2.C. Recordkeeping Requirements

	Parameter	Condition or Limit	Monitoring and reporting	Applicable Requirement(s)
I	Record keeping	-	The permittee shall comply with the recordkeeping requirements in [40 CFR Part 63 Subpart A, Section §63.10] and 40 CFR Part 63, §63.454(b). The recordkeeping required by permit conditions A.5 and E.2 shall fulfill the CMS monitoring and recordkeeping requirements for the pulping part of MACT I.	40 CFR 63.454 WAC 173-400-075(5)
Ii	Inspection	-	For each applicable enclosure opening, closed vent system, and closed collection system, the permittee shall prepare and maintain a site-specific inspection plan, in accordance with 40 CFR Part 63, §63.454(b)--including a drawing or schematic of the components of applicable affected equipment--and shall record the following information for each inspection: a. Date of inspection; b. The equipment type and identification; c. Results of negative pressure tests for enclosures; d. Results of leak detection tests; e. The nature of any defect or leak and the method of detection; f. The date any defect or leak was detected and the date of each attempt to repair the defect or leak; g. Repair methods applied in each attempt to repair the defect or leak; h. The reason for the delay--if the defect or leak was not repaired within 15 days; i. The expected date of successful repair of the defect or leak--if the repair was not completed within 15 days; j. The date of successful repair of the defect or leak; k. The position and duration of opening of bypass line valves, and the condition of any valve seals; and l. The duration of manual or computer-controlled by-pass valves use.	40 CFR 63.454 WAC 173-400-075(5)

G.2.D. Reporting Requirements

	Parameter	Condition or limit	Monitoring and reporting	Applicable requirements
i	Reporting	-	The following requirements apply to the Sulfite pulping Source Group: a. The permittee shall comply with the reporting requirements in 40 CFR Part 63, Subpart A, and all of the requirements in 40 CFR 63.455. b. The permittee shall every two years beginning April 15, 1999, submit a non-binding control strategy report in accordance with 40 CFR Part 63 §63.455(a) including the information specified in §63.455(b)(1) through (b)(3) in addition to the information required in 40 CFR Part 63 Subpart A, Section §63.9(b)(2) until three years after the effective date of the NPDES permit.	40 CFR 63.455 and WAC 173-400-075(5)

[1] CMS Data Recovery. State and federal regulations recognize that monitoring data may be lost for legitimate reasons. The permittee may be exempted from monitoring and reporting requirements during periods of monitoring system malfunctions, provided that the permittee shows the malfunction was unavoidable and is being repaired as expeditiously as practicable. [40 CFR §60.13(e**)**, and 40 CFR §63.8(c)(4); also WAC 173-400-105(5)(h), and WAC 173-405-077]

The permittee shall make every effort to acquire, maintain, and recover valid monitoring data. CMS downtime and resulting monitoring data loss due to malfunctions shall be less than 10% of the monthly unit operating time. An acceptable explanation for the loss of monitoring data must be provided in the monthly report. Periods when CMS data is not recovered due to daily calibration, zero and span checks are not considered nor reported as CMS downtime in the monthly report. Records of daily calibration, zero and span checks shall be kept for a period of five years from the event date, and made available to Ecology upon request. [WAC 173-401-615(1)(c); and WAC 173-401-630(1)]

[2]A federal court has issued an order that could make the Boiler MACT inapplicable in the near future, but the court's order has not yet taken effect. The parties to the case are allowed 45 days to seek rehearing or to request that the rule remain enforceable pending EPA's action to revise it. If no parties file a request of this nature, the court should issue the formal mandate vacating the Boiler MACT rule on or about July 30. Once the court issues the mandate, the rule would no longer be enforceable. However, if any party to the case files a motion before July 30 asking the court to let the rule remain in effect pending EPA's revision of the rule, the rule will remain in effect until the court resolves those requests. EPA is evaluating its options and has not reached any decision whether to request that the Boiler MACT rule remain enforceable pending revision. If the mandate vacating the Boiler MACT is issued sources that were subject to the rule will need to file applications for permits containing MACT limits derived on a case-by-case basis within a time specified by EPA or state permitting authorities.

FACILITY-WIDE GENERAL REQUIREMENTS
[WAC 173-401-600]

These generally applicable requirements apply facility-wide, including insignificant emission units or activities. Insignificant emission units or activities, however, are not subject to monitoring, testing, recordkeeping, reporting, or compliance certification requirements.

1. Varying Emission Rate. The permittee cannot vary the rate of emission of a pollutant according to atmospheric conditions or ambient concentrations of that pollutant, except as directed according to air pollution episode regulations. [WAC 173-400-205]

2. Detrimental Emissions. The permittee shall not cause or permit emission of any contaminant if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business. [WAC 173-400-040(5)]

3. Concealment and Masking. The permittee shall not install or use any means that conceal or mask an emission of an air contaminant that would otherwise violate provisions in this permit. [WAC 173-400-040(7)]

4. Fugitive Emissions. The permittee shall take reasonable precautions to prevent the release of air contaminants from emission units engaged in material handling, construction, demolition, or any other operation that is a source of fugitive emissions. Reasonable precautions include but are not limited to application of water to paved areas and debris piles as necessary to control fugitive dust or the timely removal or coverage of material piles. [WAC 173-400-040(3)(a)]

5. Fugitive Dust. The permittee shall take reasonable precautions to prevent fugitive dust from becoming airborne and maintain and operate the source to minimize emissions. Reasonable precautions include but are not limited to application of water to paved areas and debris piles as necessary to control fugitive dust or the timely removal or coverage of material piles. [WAC 173-400-040(8)(a)]

6. Particulate Matter Deposition. **The following condition is state-only and is not federally enforceable under the Clean Air Act:** No deposit of particulate matter beyond property line so as to interfere unreasonably with use and enjoyment. [WAC 173-400-040(2)]

7. Odors. **The following condition is state-only and is not federally enforceable under the Clean Air Act:** Any person causing odor which may unreasonably interfere with use & enjoyment of property must use recognized good practice and procedures to reduce odors to a reasonable minimum. [WAC 173-400-040(4)]

8 Opacity. The permittee may not cause or allow the emission of a plume from any emission unit other than a recovery furnace which has an average opacity greater than 20% for more than 3 consecutive minutes in any 60 minute period except as provided in WAC 173-400-040)(1)(a). [WAC 173-400-040(1)]

9. Complaints. Except where specific requirements are defined elsewhere, the permittee shall assure compliance with conditions 1 through 7 by recordkeeping of actions taken by the permittee in response to complaints received by the permittee or of possible noncompliance noticed by the facility staff in day to day operations. The permittee shall assess the validity of each complaint and commence corrective action, if warranted, as soon as possible but no later than 3 working days of receiving the complaint. The permittee shall keep records of the following: complaints

received; the assessment of validity; and what, if any, corrective action was taken in response to the complaint. [WAC 173-401-630]

10. Sulfur Dioxide Emissions. Emissions from any unit, other than a recovery system, a blow system or acid plant, shall not exceed 1000 ppm of sulfur dioxide, corrected to seven- percent oxygen in the case of combustion unit, for an hourly average. [WAC 173-410-040(1)(f)]

11. Comply with Applicable Requirements.

    A. The permittee will continue to comply with applicable requirements with which the permittee is in compliance. [WAC 173-401-630(3) and 510(2)(h)(iii)(A)]
    B. The permittee will meet applicable requirements that become effective during the permit term on a timely basis. [WAC 173-401-630(3) and 510(2)(h)(iii)(B)]

12. Good Air Pollution Control Practice. The permittee shall at all times, including periods of abnormal operation and upset conditions, to the extent practicable, maintain and operate any affected facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practice. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to Ecology which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [WAC 173-410-040(4)]

13. Chemical Accidental Release Program – This stationary source, as defined in 40 CFR section 68.3, may be subject to part 68, the accidental release prevention regulations. If required this stationary source shall submit a risk management plan (RMP) by the date specified in section 68.10. If required this stationary source shall certify compliance with the requirements of part 68 as part of the annual compliance certification per 40 CFR part 70 or 71.

14. Stratospheric Ozone Protection

    A The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditions (MVACs) in Subpart B:
        i. Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to § 82.156.
        ii. Equipment used during the maintenance, service, repair or disposal must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
        iii. Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technical certification program pursuant to § 82.161.
        iv. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to § 82.166 ("MVAC-like appliance" is defined at § 82.152.)
        v. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
        vi. Owners/operators of appliances normally containing 50 or more pounds or refrigerant purchased and added to such appliances pursuant to § 82.166."
    B Permittee may switch from any ozone-depleting substance to any alternative approved pursuant to the Significant New Alternatives Program (SANP), 40 CFR Part 82, Subpart G, without a permit revision but shall not switch to a substitute listed as unacceptable pursuant to such program. [40 CFR 82.174]
    C Any certified technician employed by Permittee shall keep a copy of their certification at their place of employment. [40 CFR 82.166(1)]

D The Permittee shall not willfully release any regulated refrigerant and shall use refrigerant extraction equipment to recover regulated refrigerant that would otherwise be released into the atmosphere. [RCW 7070.94.970(2), 970(4)] State Only

E Compliance with this term and condition will be demonstrated by using a certified contractor or employee. [40 CFR Section 82 and RCW 70.94.970 (the RCW is a state-only requirement)]

15. Insignificant Emission Units. The generally applicable requirements that apply to IEUs are, WAC 173-400-040, WAC 173-400-050(1) & (3), and WAC 173-400-060.

16. Volatile Organic Liquid Storage Vessels - The permittee shall keep records showing the dimensions and capacities of all storage vessels having capacities greater than or equal to 40 cubic meters that are used to store volatile organic liquids and for which construction, reconstruction, or modification commenced after July 23, 1984. These records are to be kept for the life of each storage vessel. [40 CFR 60.116b (a) and (b)]

17. Used Oil Burning. **The following condition is state-only and is not federally enforceable under the Clean Air Act.** The permittee cannot burn used oil not meeting standards prescribed in RCW 70.94.610(1). [RCW 70.94.610]

18. Asbestos. The permittee shall comply with the applicable requirements of 40 CFR Part 61, subpart M (asbestos NESHAP) and WAC 173-400-075 when conducting any renovation or demolition at the facility. [WAC 173-400-075]

19. Reserved.

20. Reserved.

21. Unit-Specific Requirements. The permittee shall conduct routine monitoring of emissions in accordance with the program of monitoring or testing required by specific emission unit conditions of this permit. [WAC 173-410-062].

22. Unavoidable Excess Emissions. This condition applies, where applicable, to excess emissions that are claimed to be unavoidable pursuant to WAC 173-400-107. The permittee may include in its reports demonstrations that excess emissions were unavoidable, consistent with the requirements of WAC 173-400-107. The permittee shall have the burden to prove that deviations from permit terms were unavoidable. Excess emissions that are unavoidable are excused and are not subject to penalty. [WAC 173-400-107]

23. Violation Duration. A violation of an emission limit is presumed to commence at the time of the testing, recordkeeping or monitoring indicating noncompliance, and to continue until the time of retesting, recordkeeping or monitoring that indicates compliance. This presumption may be defeated if credible evidence shows that the violation was of longer duration, that there were intervening days during which no violation occurred or that the violation was not continuing in nature. [42 U.S.C. 7413(e)(2)]. The permittee may conduct monitoring or testing more frequently than required by this permit.

24. Insignificant Emission Units. The permittee is not subject to any testing, monitoring, reporting, or recordkeeping for the insignificant emission units or activities listed. [WAC 173-401-530(2)(c)]

25. Reserved.

Recordkeeping Requirements

26. Monitoring Records. The permittee shall keep records of any periodic and continuous monitoring required by this permit. These records shall include the following, where applicable:
    a. The date, place as defined in requirement, and time of sampling or measurement;
    b. The date(s) analysis was performed;
    c. The company or entity that performed the analysis;
    d. The analytical techniques or methods used;
    e. The results of such analysis; and
    f. The operating conditions existing at the time of sampling or measurement.
    [WAC 173-401-615(2)(a) and WAC 173-400-105]

27. Inspection Checklists. Where the permittee is required to use and maintain an inspection checklist, the checklist must contain, at a minimum, the following information:
    a. The person conducting the inspection;
    b. The date/time of the inspection;
    c. Location of the inspection;
    d. The observations made during the inspection;
    e. Corrective actions taken if any; and
    f. The date and time corrective action was initiated and completed.
    [WAC 173-401-615(1)(b)]

28. Changes at Source. The permittee shall keep records describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. [WAC 173-401-724(5).]

29. Records Retention. The permittee shall retain records of all required monitoring data and support information for a period of 5 years from the date of monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all data from continuous monitoring instrumentation, and copies of all reports required by this permit. [WAC 173-401-615(2)(c)]

30. Recording Permit Deviations. The permittee shall maintain a contemporaneous record of any deviation from the requirements of this permit. [WAC 173-401-615(3)(b).]

31. Reserved.

Reporting Requirements [WAC 173-401-520, -615(3), & -710]

32. Unit Reporting Requirements. In addition to any emission unit specific reporting requirements identified below, emission unit specific reporting requirements are identified in specific emission unit conditions of this permit.

33. Production Reporting. Report within 15 days of the end of each month average daily production of air-dried unbleached pulp. [WAC 173-410-062(2)]

34. Monthly Reports. Monitoring reports required by this permit must be submitted to Ecology within 15 days of the end of each calendar month. [WAC 173-410-062(2)] The reports must clearly identify all instances of deviations from permit requirements. [WAC 173-401-615(3)(a)]

35. Emission Inventory. The permittee shall submit an inventory of emissions, as specified in WAC 173-410-071, from the source each year no later than 105 days after the end of the calendar year.

The permittee shall maintain records of information necessary to substantiate any reported emissions. [WAC 173-410-071 and WAC 173-400-105(1)]

36. Permit Deviations/Excess Emissions. The permittee shall promptly submit a report of any deviations from permit conditions.
    a. For purposes of this permit, submitting a report "promptly" means the following: (1) if the deviation presents a potential threat to human health or safety, the report shall be made as soon as possible but no later than 12 hours after the discovery of the deviation; (2) for other deviations, "promptly" means that the deviations are identified in the respective monthly report.
    b. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. The permittee may include in its reports demonstrations that excess emissions were unavoidable, consistent with the requirements of WAC 173-400-107. [WAC 173-401-615(3)(b) and WAC 173-400-107]

37. Certifications. Any application form, report, or compliance certification submitted pursuant to Chapter 173-401 WAC shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under Chapter 173-401 WAC 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]

38. Report Address. All reports, renewal applications, and compliance certifications required by this permit shall be submitted to:

    Department of Ecology
    Industrial Section
    P.O. Box 47706
    Olympia, WA 98504-7706

    Compliance certification shall also be submitted to:

    Environmental Protection Agency
    Air Operating Permits, Region 10
    1200 Sixth Avenue, OAQ-108
    Seattle, WA 98101-1128

39. Compliance Requirements/Certification.
    a. The permittee shall continue to comply with applicable requirements with which the permittee is in compliance;
    b. The permittee shall meet applicable requirements that will become effective during the permit period on a timely basis;
    c. The permittee shall submit a report to the Department of Ecology and to Region 10 of EPA each year of the terms of this permit by April 15 following the year of operation that the permittee is certifying compliance with the terms and conditions contained in this permit. The certification shall describe the following:
        i. the permit term or condition that is the basis of the certification;
        ii. the compliance status;
        iii. whether compliance was continuous or intermittent; and
        iv. the methods used for determining compliance, currently and over the reporting period consistent with required monitoring

d. The permittee is not required to certify compliance for insignificant emission units or activities. [WAC 173-401-530(2)(d), WAC 173-401-510(2)(h)(iii), and WAC 173-401-630 (5)]

40. Reserved.

STANDARD TERMS & CONDITIONS

41. Duty to Comply. The permittee must comply with all conditions of this chapter 401 permit. Any permit noncompliance constitutes a violation of chapter 70.94 RCW and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [WAC 173-401-620(2)(a)]

42. 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)]

43. 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)]

44. Property Rights. This permit does not convey any property rights of any sort, or any exclusive privilege. [WAC 173-401-620(2)(d)]

45. Duty to Provide Information. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority 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 the permitting authority 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 EPA 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)]

46. 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. [WAC 173-401-620(2)(f)]

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

48. Severability Clause. 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)]

49. Permit Appeals. The permittee may appeal this permit or any conditions in it only by filing an appeal with the pollution control hearings board and serving it on the permitting authority within thirty days of receipt pursuant to RCW 43.21B.310. This provision for appeal in this section is separate from and additional to any federal rights to petition and review under § 505(b) of the FCAA. [WAC 173-401-620(2)(i)]

50. Permit Continuation. This permit and all terms and conditions contained therein, including any permit shield provided under WAC 173-401-640, shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. [WAC 173-401-620(2)(j)]

51. Application and Issuance of a Renewal Permit. The permittee shall submit a complete permit renewal application to Ecology no later than six months, but no earlier than 18 months, prior to the expiration date of the existing permit. Permits being renewed are subject to the same procedural requirements, including those for public participation, affected state and EPA review that apply to the initial permit. [WAC 173-401-710(1)&(2)]

52. Inspection and Entry. The permittee shall allow the permitting authority or an authorized representative to perform the following upon presentation of credentials and other documents as may be required by law:
    a. Enter upon the permittee's premises where a chapter 401 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
    b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
    c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
    d. 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 the permit or applicable requirements. [WAC 173-401-630(2)]

53. Federally Enforceable Requirements. All terms and conditions of this permit, including any provisions designed to limit potential to emit, are enforceable by EPA and citizens under the FCAA, unless they are specifically designated as not federally enforceable. [WAC 173-401-625]

54. Reopening for Cause. This permit shall be reopened and revised under any of the following circumstances:
    a. Additional applicable requirements become applicable when the remaining permit term is greater than three years. Such reopening shall be completed not later than 18 months after promulgation of the applicable requirement. 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).
    b. Additional requirements (including excess emissions requirements) become applicable under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated in the permit.
    c. Ecology 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; or
    d. Ecology determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

    Procedures 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. [WAC 173-401-730]

55. Tampering and False Statements. No person shall make any false material statement, representation or certification in any form, notice or report required in this permit. No person shall render inaccurate any monitoring device or method required under this permit. [WAC 173-400-105(7) and (8) and 40 CFR 70.11(a)]

56. Providing Additional Data. For Ecology to evaluate a plant's emissions or emission control program, the permittee shall furnish other data requested by Ecology. [WAC 173-410-062(3)]

PERMIT SHIELD/ INAPPLICABLE REQUIREMENTS

Pursuant to WAC 173-401-640(1), compliance with the terms and conditions of this permit shall be deemed compliance with the applicable requirements identified in this permit, as of the date of permit issuance. This permit shield does not exempt the permittee from requirements determined to be applicable and enacted after the permit issuance date. This permit shield shall not apply to any insignificant emission unit or activity designated under WAC 173-401-530. [WAC 173-401-530(3) and WAC 173-401-640(1)]

Pursuant to WAC 173-401-640(2), the Department of Ecology has determined that the requirements listed in Permit Appendix A (below) do not apply to the facility, as of the date of permit issuance, for the reasons specified.

APPENDIX A: PERMIT SHIELD/INAPPLICABLE REQUIREMENTS

All inapplicable requirements have not been included in the table below. The requirements that are obviously inapplicable to the pulp mill have been deleted from the table below. The following requirements do not apply to the facility:

Citation	Title or Applicability	Reason(s) for Inapplicability
WAC 173-400-040(1)(c)	20 percent opacity for multiple stacks	The facility does not have any multiple stack connected to a common source
WAC 173-400-040(1)(d)	Alternate opacity limit	The facility does not have any alternative opacity limit
WAC 173-400-040(3)(b) (state and federal versions)	Materials handling, construction, demolition, etc. at emissions unit identified as a significant contributor to nonattainment	The facility is not located in a nonattainment area
WAC 173-400-040(6) Sulfur dioxide	Emission limit of 1,000 ppmv SO_2 (corrected to 7% O_2), average of 60 consecutive minutes	This rule is superseded by: WAC 173-410-040(1)(f)
WAC 173-400-040(8)(b)	Fugitive dust sources identified as significant contributors to PM-10 nonattainment	The facility is not located in a PM-10 nonattainment area
WAC 173-400-050(1)	Particulate standards	This regulation is preempted by: WAC 173-410-040(2)(c)(i)
WAC 173-400-050(2)	Incinerator carbonyl emission limit of 100 ppmv total carbonyls	The facility does not have this emission unit.
WAC 173-410-040(1)(b)	Average daily emissions of SO_2 shall not exceed 4 lbs/air dried ton of unbleached pulp for facilities which do not incinerate sulfite liquor	The facility incinerates sulfite liquor. Order No. DE 95AQ-I034 provides for a limit of 20 lb/ton of pulp, consistent with a facility which incinerates liquor. The inapplicability of this rule is facility-wide.

Citation	Title or Applicability	Reason(s) for Inapplicability
WAC 173-410-040(1)(e)	Sulfur dioxide limitation (300 ppm, hourly average) for recovery systems constructed after 1/24/72	The recovery system was constructed prior to 1/24/72
WAC 173-410-040(2)(b)	Particulate limitation (0.06 gr/dscf) applicable to recovery systems constructed after 1/24/72	The recovery system was constructed prior to 1/24/72
[WAC 173-410-040(2)(c)(ii)]	Particulate limitation for combustion units firing other than wood fuel constructed after 1/1/83	The wood-fired combustion equipment was constructed before 1/1/83
[WAC 173-410-040(2)(c)(iii)]	Particulate limitation for combustion units not classified under (c) (i) or (ii) of this subsection	The facility does not have this type of emission unit
[40 CFR Part 60 Subpart D]	Fossil-fuel-fired industrial steam generators w/ heat input capacity in excess of 250 MMBtu/hr constructed or modified after August 17, 1971	The hog fuel boiler at Weyerhaeuser - Cosmopolis was not constructed or modified after this date. Other steam generating units have capacity less than 250 MMBtu/hr
[40 CFR Part 60 Subpart Da]	Standards of Performance for electric utility steam-generating units for which construction commenced after September 18, 1978	There are no units in this source category that have been constructed after the applicability date.
[40 CFR Part 60 Subpart Db]	NSPS for Industrial-Commercial-Institutional Steam Generating Units	There are no units in this source category.
[40 CFR Part 60 Subpart Dc]	NSPS for Small Industrial-Commercial-Institutional Steam Generating Units	Weyerhaeuser - Cosmopolis does not have any units of this size
40 CFR Part 50	National Primary and Secondary Ambient Air Quality Standards	Applies to airsheds
40 CFR Part 53	Ambient Air Monitoring Reference and Equivalent Methods	There are no units in this source category
[40 CFR Part 63 Subpart EEEE]	Organic Liquids Distribution(Non-gasoline)	EPA Determined that the methanol storage tanks were components of the bleaching system subject to Subpart S and not subject to Subpart EEEE
40 CFR Part 70	State Operating Permit Programs	Administrative and jurisdictional
40 CFR Part 72	Permits (Title IV, Acid Rain)	Administrative and jurisdictional; not this source category
40 CFR Part 73	Sulfur Dioxide Allowance System (Title IV)	There are no units in this source category
40 CFR Part 75	Continuous Emission Monitoring (Title IV)	There are no units in this source category
40 CFR Part 77	Excess Emissions (Title IV)	There are no units in this source category

Citation	Title or Applicability	Reason(s) for Inapplicability
[40 CFR Part 82, Except Subparts F]	Stratospheric Ozone Protection Regulations	There are no units in this source category
40 CFR Part 85	Control of Air Pollution from Motor Vehicles and Motor Vehicle Engines	There are no units in this source category
40 CFR Part 86	Control of Air Pollution from New and In-Use Motor Vehicles and New and In-Use Motor Vehicle Engines; Certification and Test Procedures	There are no units in this source category
40 CFR Part 88	Clean-Fuel Vehicles	There are no units in this source category

APPENDIX B: ABBREVIATIONS USED IN PERMIT

@	At
AAQS	Ambient Air Quality Standards
ADUT	Air dried unbleached ton (containing no greater than 10 % water)
ADUTD	Air dried unbleached ton per day
CEM	Continuous emission monitoring
CFR	Code of Federal Register
DOE	Department of Ecology
Dscf	Dry standard cubic foot
EPA	Environmental Protection Agency
FCAA	Federal Clean Air Act
Gr	Grains
HAP	Hazardous air pollutant
IEU	Insignificant emission unit
lb(s)	Pound(s)
MVAC	Motor vehicle air conditioning
NSPS	New Source Performance Standard
ppm	Parts per million
ppmv	Parts per million by volume
RCW	Revised Code of Washington
SERP	State Emergency Episode Plan
tdy	Ton per year
VOC	Volatile organic compound
WAC	Washington Administrative Code

APPENDIX C: FORMS AND ALGORITHMS

WEYERHAEUSER COMPANY
Cosmopolis, Washington

Appendix C -- Algorithm for emission calculations for permit conditions F1

PULPING GROUP	Emission unit specific historical Emission Factor	
See Note 1 below		
(DB-26) Nuisance Tower vent (DOE Method 6 modified)		lbs SO_2 / ADUT
(BS-7) Nos. 1, 2, & 3 BSW vent (SO2 analyzer on grab bag air sample -- EPA Method 6C -- Modified)		lbs SO_2 / ADUT
(BS-6) No. 4 BSW & Knotters vent (SO2 analyzer on grab bag air sample -- EPA Method 6C -- Modified)		lbs SO_2 / ADUT
POWER & RECOVERY	**See general Algorithm**	
See Note 1 below		
(AP-10) Recovery Boiler's Combined stack (EPA Method 6C)		lbs SO_2 / ADUT
COMBINED IEU CONTRIBUTION	**Emission unit specific historical Emission Factor**	
See Note 1 below		
Estimated collective IEU's contribution (SO2 analyzer on grab bag air sample -- EPA Method 6C -- Modified)		lbs SO_2 / ADUT
COMBINED LOADING	**Emission unit specific historical Emission Factor**	
TOTAL amount		lbs SO_2 / ADUT

Permit Condition F1: General SO2 emission calculation (Algorithm):
Note 1
Where grab bag air samples are collected, corresponding air flow determined by DOE Method 2 or equivalent.

For EPA Method 6C

$$\text{Pounds SO2/ADUT} = \frac{(\text{ppm } SO_2)\ (\text{64 lbs } SO_2 / \text{lb mole}) * \text{Flow(sdcf / min)}\ (\text{1,440 min / day})}{(\text{1,000,000})(\text{385.4 ft}^3 / \text{lb mole @ 20 C}) * \text{Production(Daily avg ADUST)}}$$

For DOE Method 6

lbs. SO2/ADUT = concentration(lbs SO2/Hour)*24 hours/day / Production(ADUT/day)

Permit Condition D1: Volatile organic compounds algorithm - D1
Annual average daily production (ADUTD) times the emission factor times the number of operating days

REPORTING SCHEDULE FOR COMBINED RECOVERY STACK

Reference Regulatory Order No. DE95Q-IO34, Attachment B, Recovery Furnace

Sulfur Dioxide (SO_2), for the month of January, 2004

Date/Time	0000	0100	0200	0300	0400	0500	0600	0700	0800	0900	1000	1100	1200	1300	1400	1500	1600	1700	1800	1900	2000	2100	2200	2300	Avg
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APPENDIX D: **REGUATORY ORDERS**

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
P.O. Box 47600 • Olympia, Washington 98504-7600 • (206) 407-6000 • TDD Only (Hearing Impaired) (206) 407-6006

May 26, 1995

CERTIFIED MAIL

Z 425 439 137

Mr. Truman L. Seely
Vice President/Mill Manager
Weyerhaeuser Pulp Mill, Cosmopolis
P. O. Box 1000
Cosmopolis, WA 98537

Dear Mr. Seely:

Enclosed is Order No. DE 95AQI034. This order is issued pursuant to authorities set forth in ch. 70.94 RCWincluding RCW 70.94.141(3).

If you have any questions concerning the content of this document call Don Nelson at (360) 407-6940.

Sincerely,

M. F. Palko
Industrial Section
Central Programs

Enclosures

DEPARTMENT OF ECOLOGY

IN THE MATTER OF AIR	)	ORDER No. DE 95AQ-I034
EMISSIONS FROM WEYERHAEUSER	)	AMENDING ORDERS
PULP MILL	)	DE 78-103, DE 83-287,
	)	DE 83-385, DE 85-610,
	)	AND DE 87-140

This Order amends certain provisions of those air quality requirements applicable to the Weyerhaeuser Pulp Mill, Cosmopolis, Washington ("Weyerhaeuser"). The following items are hereby amended: Orders DE 78-103; DE 78-103, Revised; DE 83-385; DE 83-287; DE 85-610; and DE 87-l40.

DE 78-103:

1. The 4 lb particulate/ADUT, is hereby amended to 0.10 gr/dscf @ 8% O_2 to conform to WAC 173-410-040(2) (a).

2. Delete reference to WAC 173-410-036(6) because it has been deleted from Ch. 173-410 WAC.

3. Delete reference to compliance schedule because currently there are no outstanding items.

4. The alternate opacity procedure is defined for the recovery furnace system.

5. Delete calculation based on flow per ton and base flow on stack test measurements.

6. Delete requirement to report SO_2 concentration between 300 and 800 ppm. The limit for SO_2 is 360 ppm as was specified in DE 85-610.7.

7. Delete reference to 50 ppm nondetect for SO_2.

8. Delete fact sheet to order DE 78-103.

9. Weyerhaeuser may burn secondary sludge in the recovery furnaces as approved by letter dated June 17, 1992 from Richard Burkhalter.

10. Delete recovery furnace stack flow base on spent sulfite liquor and add flow base on stack test measurement.

DE 83-287

1. The alternate opacity parameter, (AOP), for the hogged fuel boiler's scrubber requires that the scrubber flow be maintained greater than or equal to 605 gallon/minute and that a pressure drop be maintained, delta p, greater than or equal to 10 inches of water. Weyerhaeuser shall provide continuous monitoring and monthly reporting of any exceptions.

2. Added sulfur dioxide limit of 1000 ppm as per WAC 173-400-040(6). Defined compliance method for sulfur dioxide limit. Weyerhaeuser shall certify yearly that the sulfur content of the fuel oil is less that 2 percent sulfur.

3. Added schedule for soot blowing/grate cleaning.

DE 83-385

Delete hogged fuel pulverizer as a source because the emissions are routed to the hogged fuel boiler as intake air.

DE 85-610

Add the sulfur dioxide limit of 360 ppm per DE 85-610 to this order and delete all other DE 83-610 requirements.

DE 87-140

1. The alternate opacity procedure is defined for the hogged fuel furnace system.

2. Added sulfur dioxide limit of 1000 ppm to the order as per WAC 173-400-040(6). Defined compliance method for sulfur dioxide limit. Weyerhaeuser must certify yearly that the sulfur content of the fuel oil is less that 2 percent sulfur.

The requirements set forth in this Amended Order describe specific air emission limitations and operating conditions, as well as methods, frequency and format required for monitoring and reporting.
For ease of reference requirements that are currently applicable to Weyerhaeuser are summarized in Attachment A and B. All portions of the documents mentioned in the amended order that do not appear in Attachment A and B have been deleted or modified and are no longer applicable. Weyerhaeuser shall comply with the emissions limitations, monitoring requirements, methods, frequency and format required for monitoring and reporting and the special conditions contained in this order.
Nothing in this order shall be construed to relieve Weyerhaeuser of its obligations under any applicable state, local, or federal laws or regulations.
This Amended Order is issued pursuant to authorities set forth in ch. 70.94 RCW, including RCW 70.94.141(3).

DATED on this 26 day of May 1995, at Olympia, Washington

M F Palko

M.F. Palko
Industrial Section Supervisor
Central Programs

Weyerhaeuser agrees to be bound by the terms and conditions set forth in this Amended Order and agrees not to appeal any of the new, changed, or deleted requirements.

Truman L Seely

Truman L Seely
Vice President/Mill Manager
Weyerhaeuser Pulp Mill, Cosmopolis

Attachment A. Special Conditions

1. All air pollution control equipment shall be continuously and efficiently operated and maintained.

2. All air emission reports shall be prepared on approved reporting schedules. Emission reports shall be submitted to the Department of Ecology no later than the 15th of the month following the reporting month.

3. Calculation procedures are described in detail in the Approved Test Methods as specified in Emission Limitation and Monitoring Schedule, (Attachment B.). The flow used in the lbs SO_2/ADUT calculations shall be base on measurements of the flow during source tests conducted on the recovery furnaces' stack. The moisture content used shall not exceed the saturated value at the measured stack gas temperature.

4. Weyerhaeuser may burn biosolids in all three recovery furnaces.

5. Procedures applicable whenever any emission control device is out of service.
   A. When the hogged fuel boiler scrubber is shut down for any reason, the emission shall continue to meet the 20 percent opacity limitation.
   B. In accordance with WAC 173-400-040(1) (a) Weyerhaeuser is permitted to perform soot blowing/grate cleaning for 15 minutes at about 0400, 1200, and 2000 hours on the hogged fuel boiler without being a violation of the opacity limit.

6. The daily average emission for SO_2 is the average of hourly SO_2 measurement in ppm that is emitted during a 24 hour period.

7. Time off scale means the total time to the nearest 30 minutes increment that the measurement was exceeding the maximum instrument scale.

8. An opacity excursion is the number of minutes in which the average opacity exceeded the limit or the AOP requirement.

ATTACHMENT B: EMISSION LIMITATION AND MONITORING SCHEDULE

Source	Parameter	Limit	Averaging Period	Monitoring Frequency	Reporting Frequency	Test Method
Recovery Furnace	Particulate	0.10 gr/dscf @ 8% O_2	Monthly	Monthly/single test	Monthly	DOE Method 5
	SO_2	360 ppm	Hourly	Continuous	Monthly	DOE Test Method 6C
	Opacity	35%	6 consec. min. per 60 min.	-------	(a)	DOE Test Method 9B
	Opacity	AOP (b, f)	Operating Instantaneously	One/Shift	Monthly	Operater Visual Reading
Hogged fuel boiler dryer	Particulate	0.1 gr/dscf (h)	Yearly	Yearly	Yearly	DOE Method 5
	SO_2	1,000 ppm	Yearly	Continuous	Yearly	Sulfur concent of fuel oil (e)
	Opacity	20 %	3 consec. min. per 60 min.	-------	(a)	DOE Test Method 9A
Hogged fuel boiler	Particulate	0.1 gr/dscf @ 7% O_2	Yearly	Yearly	Yearly	DOE Method 5
	Opacity	20% (c)	3 consec. min. per 60 min.	-------	(a)	DOE Test Method 9A
	Opacity	AOP(d,f)	Continuous	Continuous	Monthly	Scrubber flow and pressure drop
	SO_2	1,000 ppm @ 7% O_2	Yearly	Continuous	Yearly	Sulfur content of fuel oil (e)
	Delta p	≥ 10 inches W.C.	Continuous	Continuous	Monthly	Recorded
	Flow	≥ 605 gpm	Continuous	Continuous	Monthly	Recorded
Mill emission (Excluding hogged fuel boiler)	SO_2	20 LBS./ADUT (g)	Daily	Continuous	Monthly	Calculated

Emission Limitation and Monitoring Schedule Notes

a) Report excursions only.
b) The alternate opacity parameter (AOP), for the recovery system requires the recovery system absorption tower's circulation pumps to be operated continuously except for maintenance. One of the pumps may be out of service for periods no greater than 72 hours for maintenance. The AOP is only applicable when burning spent sulfite liquior in the respective recovery furnace(s), No. 1, No. 2, and/or No. 3.
(c) Soot blowing may occur at about 1200, 2000, and 0400 hours for 15 minutes without violating the opacity limit.
(d) The alternate opacity parameter, (AOP), for the hogged fuel boiler's scrubber requires that the scrubber flow be maintained greater than or equal to 605 gallon/minute and a pressure drop be maintained, a delta p, greater than or equal to 10 inches of water and to provide continuous monitoring and monthly reporting of any exceptions.
(e) Weyerhaeuser must certify the percent sulfur in the fuel on each delivery. The fuel oil used may have a maximum sulfur content of 2 percent.
(f) Alternate test methods for compliance determination can be used with Ecology approval.
(g) Air dried unbleached ton , (ADUT), is defined as pulp containing go greater than 10 percent moisture.
(h) Uncorrected for oxygen

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
P.O. Box 47600 • Olympia, Washington 98504-7600
(360) 407-6000 • TDD Only (Hearing Impaired) (360) 407-6006

January 12, 1999

CERTIFIED MAIL
Z 183 862 615

Jerry Schaaf
Weyerhaeuser Paper Company
P. O. Box 1000
Cosmopolis, WA 98537

RE: Notice of Construction, Order No. DE 94AQ-I018 (Modified)

Dear Mr. Schaaf:

Enclosed is Notice of Construction Order No. DE 94AQ-I018 (Modified) modifying the original NOC issued May 26, 1994. The modification is considered an administrative change. The modification is necessary to remove conditions that cause problems with monitoring and certification of compliance for items that are of general nature in the original NOC. The conditions are included in other parts of the permit with language directly from state regulations. The opacity limit was removed because of the nature of the source.

All correspondence and questions relating to this document should be directed to Don Nelson at (360) 407-6940.

This action is issued under the provisions of RCW 70.94 and Chapter 173.400 WAC, respectively. Any person aggrieved by the Order may obtain review thereof by application, within 30 days of receipt of this letter, to the Washington Pollution Control Hearings Board, 4224-6th Avenue, P.O. Box 40903, Lacey, Washington 98504-0903. The procedures for appealing Orders issued by the Department of Ecology are set forth in Chapter 43.21B RCW and the regulations adopted thereunder.

Sincerely,

Robert D. Carruthers

Robert Carruthers, Interim Supervisor
Industrial Section

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

IN THE MATTER OF APPROVING A MODIFIED	)	ORDER No.
CONTAWNANT SOURCE FOR	)	DE 94AQ-I018 (Modified)
WEYERHAEUSER, COSMOPOLIS	)	

To: Mr. Jerry Schaaf
Weyerhaeuser Paper Company
P. O. Box 1000
Cosmopolis, Washington 98357

On March 29, 1994, Ecology received a Notice of Construction application for the oxygen delignification/bleaching stage and blow tank including associated mixers, piping, instrumentation and control that had been constructed in 1989-90. The oxygen bleaching replaced the elemental chlorine bleaching process. Chlorine dioxide is still used in the bleaching of the pulp.
Ecology considers this amendment to be an administrative change. The purpose of these changes is to facilitate implementation of the Title V air operating permit. Requirements eliminated by this amendment are still applicable to the facility through the general requirements of the Title V air operating permit.
In relation to the above, Ecology, State of Washington, pursuant to RCW 70.94.152. WAC 173.400.110 and WAC 173.460.040. make the following determinations:

1. The project as constructed, if operated as herein required, will be in compliance with applicable rules and regulations set forth in Chapters 173-400 WAC and 173-460 WAC, and the operation thereof at it present location will not result in ambient air quality standards being exceeded.

2. The project as constructed if operated as herein required will provide all known, available, and reasonable methods of emission control.

THEREFORE. IT IS ORDERED that the company shall, upon receipt of this Notice of Construction and specifically detailed in plans, specifications and other information submitted to Ecology in reference thereto. certify that the system has been constructed, has been operated, and will continue to be operated to meet the following conditions:

I. DESCRIPTION:

A. LAWS AND REGULATIONS

Weyerhaeuser Paper Company's oxygen bleaching project is a source of air contaminants as allowed under WAC 173.400.110, August 20, 1993.

B. BACT -As required by WAC 173.400.113, August 20, 1993, this project shall use Best Available Control Technology, (BACT), to control emissions. The Project will use the following technologies and procedures to attain BACT for particulate and VOC emissions. There are no additional controls required by the project to meet BACT for particulate or VOC's.

C. T-BACT -As required by WAC 173.460.040(b), June 18, 1991, this project shall use Best Available Control Technology for Toxics, (T-BACT). The following technologies and procedures shall be used to attain T-BACT. There are no additional controls required by the project to meet T-BACT.

II. APPROVAL CONDITIONS

	Parameter	Limit Shall not exceed	Monitoring & Reporting
1.	Volatile organic compounds	34 tons VOC on a carbon basis /year	The permittee shall perform, at least on an annual basis, EPA Method 25 A Modified to confirm the emission factors of VOC per ton of production. EPA method 25A modified is the NCASI methanol (VOC) method. The permittee shall report the results of EPA Method 25 A Modified and the yearly production on the January monthly report. See D.2 for minimum operating/record keeping condition. The emission unit specific factor is derived by dividing the EPA Method 25A test results by the corresponding emission unit's production. Annual emissions = sum of emission unit specific annual production times the emission unit specific emission factor.
2.	Record keeping	Minimum record keeping for VOC	The permittee shall monitor the production of unbleached pulp produced in air dried tons per day and report the average daily production for the reporting month in the monthly air emission report form. The daily production of pulp shall be used as a minimum operational parameter for VOC emission.

All plans, specifications and other information submitted to Ecology relative to this project and further documents and any further authorizations or approvals or denials in relation thereto shall be kept at the Industrial Section air files and such action shall be incorporated herein and made part hereof.

Nothing in this approval shall be construed as obviating compliance with any requirement of law other than those imposed pursuant to the Washington Clean Air Act and rules and regulations there under.

Any violation of such rules and regulations or of the terms of this approval shall be subject to the sanctions provided in Chapter 70.94 RCW.

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

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

2. Obtaining this authorization by misrepresentation of failure to disclose fully all-relevant facts.

Provisions of this authorization are severable and, if provision of this authorization, or application of any provision to their circumstances, the remainder of this authorization, shall not be affected.

Any person feeling aggrieved by this Order may obtain review thereof by application, within 30 days of receipt of this Order to the Washington Pollution Control Hearings Board, 4224-6th Avenue, Bldg. 2, P.O. Box 40903, Olympia. Washington 98504-0903. Concurrently, a copy of the application must be sent to the Department of Ecology, Enforcement Unit, P.O. Box 47600. Olympia. Washington 98504-7600. These procedures are consistent with the provisions of Chapter 43.21B RCW and the rules and regulations adopted thereunder.

DATED at Olympia, Washington

PREPARED AND REVIEWED BY:

Donald V. Nelson

Donald V. Nelson, PE
Industrial Section
Department of Ecology

APPROVED BY:

Robert D Carruthers

Robert Carruthers, Interim Supervisor
Industrial Section
Department of Ecology

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
P.O. Box 47600 • Olympia, Washington 98504-7600
(360) 407-6000 • TDD Only (Hearing Impaired) (360) 407-6006

November 12, 1996

CERTIFIED MAIL

P 469 313 125

Jerry Schaaf
Weyerhauser Paper Company
P. O. Box 1000
Cosmopolis, WA 98537

RE: Notice of Construction, Order No. DE 96AQ-I089

Dear Mr. Schaaf:

Enclosed is Notice of Construction Order No. DE 96AQ-I089. If you have any questions concerning the content of this document, please call Don Nelson, telephone (360) 407-6940.

This action is issued under the provisions of RCW 70.94 and Chapter 173.400 WAC, respectively. Any person aggrieved by the Order may obtain review thereof by application, within 30 days of receipt of this letter, to the Washington Pollution Control Hearings Board, 4224-6th Avenue, P.O. Box 40903, Lacey, Washington 98504-0903. Concurrently, a copy of the application must be sent to the Enforcement Officer of the Department of Ecology, P.O. Box 47600, Olympia, Washington 98504-7600. The procedures for appealing Orders issued by the Department of Ecology are set forth in Chapter 43.21B RCW and the regulations adopted thereunder.

Sincerely,

Michael F. Palko
Supervisor
Industrial Section, Central Programs
Department of Ecology

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

IN THE MATTER OF APPROVING A MODIFIED CONTAMINANT SOURCE FOR WEYERHAEUSER, COSMOPOLIS	)))	ORDER No. DE 96AQ-I089

To: Mr. Jerry Schaaf
Weyerhaeuser Paper Company
P. O. Box 1000
Cosmopolis, Washington 98357

On September 12, 1996, Ecology received a Notice of Construction application for the concentrated oxygen extraction liquor (COEL) project. The COEL project includes a vapor evaporator system manufactured by Aqua-Chem with associated tanks, piping, instrumentation, and control for the Aqua-Chem evaporator system and the red liquor evaporator system rework. The COEL project will collect and evaporate a significant portion of the bleach plant oxygen and extraction stage liquors. The noncondensible gases (NCG) emissions from the evaporators containing volatile organic compounds (VOCs) and carbon monoxide (CO) will be introduced and incinerated in recovery furnaces No.1 and No.2. The evaporated liquors, rich in sodium, will be sold as a commodity product.

The City of Cosmopolis and Ecology received the building permit and NOC application package for the COEL project at approximately the same time. Since the City of Cosmopolis will issue a building permit, the city is the lead agency. The City of Cosmopolis issued a Determination of Nonsignificance. The comment period expired on November 6, 1996. No new information was obtained through public review.

FINDING OF FACT:
Weyerhaeuser Paper Company's COEL project is a source of air contaminants as allowed under WAC 173-400-110, March 22, 1995. The project must comply with all current state laws and regulations, including RCW 70.94, (Washington Clean Air Act). Chapter 173.400 WAC, (General Regulations for Air Pollution Sources), and Chapter 173.460 WAC, (Controls for New Sources of Toxic Air Pollutants.

The NCG emissions from the Aqua-Chem evaporator system and the red liquor evaporator system will be incinerated through recovery boilers No.1 and No.2 with a net estimated decrease in VOC emissions of 129 ton/year currently emitted from the common recovery stack. The major VOC analytes that will be reduced by the completion of the COEL project include

acetone, acetaldehyde, terpenes, and methanol. Methanol is the major analyte in the reduction. There will be an estimated 0.61 tons/day VOC emitted from the pressure relief valves on the new tanks. The emissions from the COEL project are insignificant with a net decrease in all emissions if the NCG gases are incinerated. There will be an estimated overall reduction of 12.2 tons CO /year when the COEL emission unit is operational and the NCG gases are incinerated in the recovery boilers.

The COEL project was evaluated by the new source review process. The pressure relief valves are the only new emission points for the COEL project. A screen model was ran for each of the above listed HAP's with and without the COEL project. The screen model showed that there would be an improvement to air quality with the COEL project. Determination of compliance will be that the gaseous stream from the COEL project is continuously burned when the COEL system is in operation, except during startups or emergency shutdowns of recovery furnace No. 1 or No.2. The cross over piping system for burning the noncondensible gases from either the Aqua-evaporator system and the red liquor evaporators in either/or both recovery furnace No.1 and recovery furnace No.2 is considered BACT and T -BACT.

In relation to the above, Ecology, State of Washington, pursuant to RCW 70.94.152, WAC 173-400-110 and WAC 173-460-040, makes the following determinations:

1. If constructed and operated as described in the NOC herein required, the project will be in compliance with applicable rules and regulations set forth in Chapters 173-400 WAC and 173-460 WAC, and the operation thereof at the planned location will not result in ambient air quality standards being exceeded.

2. The project as herein described will provide BACT and T-BACT emission controls.

The Notice of Construction is hereby approved for the COEL project. Your company may proceed with the project at your convenience. Any activity undertaken by the source or other, in a manner which is inconsistent with the application and this determination, shall be subject to Ecology enforcement under applicable regulations. Nothing in the ORDER shall be construed so as to relieve the source of its obligations under any state, local, or federal regulations. Ecology shall be notified when construction commences and when the system becomes operational.

THEREFORE. IT IS ORDERED that your company shall, upon receipt of this Notice of Construction, construct the project in accordance with the following conditions and limitations:

APPROVAL CONDITIONS:

A. EMISSION LIMITS

The VOC shall be introduced into the either or both recovery furnace No.1 and recovery furnace No.2 if both furnaces are operational or the one that is operational if one furnace is shutdown when the COEL' project is in operation except for startups or emergency shutdowns of recovery boilers No.1 and/or No.2. In cases of emergency shutdowns, the NCG gases will be routed to the furnace that is in operation in a timely manner. For safety reasons, during startup and emergency boiler system shutdowns, the NCG gases directed to the down boiler, may be vented to the cooling tower(s) until the gases can be rerouted to the operational boiler. The gases must be rerouted to the operational boiler in a timely manner. In a timely manner is defined as one (1) hour.

B. VERIFICATION OF COMPUANCE AND RECORDS

If the NCG's are being incinerated when the COEL system is in operation except under startups or emergency shutdowns of the furnaces the emission unit is in compliance. Records of the destination of the COEL project NCG gases to No.1 recovery furnace, to No.2 recovery furnace, or to No.1 and No.2 recovery furnaces with the operational status of each furnace shall be recorded in a daily log book. Records shall be kept of all startups and emergency shutdowns of furnaces No.1 and No.2 and the operational status of the COEL project. Records shall be readily available for inspection by Ecology during normal operational hours.

Construction under this ORDER shall begin within eighteen months of the issuance date or another application for a NOC may be required. This approval shall become void if construction or operation of the facility is discontinued for a period of eighteen months. Operation of the equipment must be conducted in compliance with all data and specifications submitted as part of the NOC application unless otherwise approved by Ecology.

Nothing in this approval shall be construed as obviating compliance with any requirement of law other than those imposed pursuant to the Washington Clean Air Act and rules and regulations thereunder.

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

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

2. Obtaining this authorization by misrepresentation of failure to disclose fully all relevant facts .

Provisions of this authorization are severable and, if provision of this authorization, or application of any provision to their circumstances, the remainder of this authorization, shall not be affected.

Any person feeling aggrieved by this Order may obtain review thereof by application, within 30 days of receipt of this Order to the Washington Pollution Control Hearings Board, 4224-6th Avenue, Bldg. 2, P.O. Box 40903, Olympia, Washington 98504-0903. Concurrently, a copy of the application must be sent to the Department of Ecology, Enforcement Unit, P.O. Box 47600, Olympia, Washington 98504-7600. These procedures are consistent with the provisions of Chapter 43.21B RCW and the rules and regulations adopted thereunder.

DATED at Olympia, Washington

PREPARED AND REVIEWED BY:

Donald V. Nelson, PE
Industrial Section, Central Programs
Department of Ecology

APPROVED BY:

Michael F. Palko
Industrial Section, Central Programs
Department of Ecology

Correspondence

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
P.O. Box 47600 ◦ Olympia, Washington 98504-7600
(360) 407-6000 ◦ TDD Only (Hearing Impaired) (360) 407-6006

December 5, 2003

CERTIFIED MAIL
No. 7099 3220 0008 8266 8929

J. Fred Cassidy, Vice President/Mill Manager
Weyerhaeuser Paper Company
P. O. Box 1000
Cosmopolis, Washington 98357

Dear Mr. Cassidy:

Enclosed is Order No. DE 03AQIS-5813. All correspondence relating to this document should be directed to:

Don Nelson at Department of Ecology, Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600.

If you have any questions concerning the content of the document, please call Mr. Nelson at
(360) 407-6940.

Sincerely,

Carol Kraege

Carol Kraege, P.E.
Industrial Section Manager
Solid Waste & Financial Assistance Program

Enclosure

Facility: Weyer	
Year: 03	Left Right
Air	Cor
Water	Reports
NPDES	Permit
WET-Tox	Enf
DW/RCRA	Eng
Clean Up	Sub
SW	
HWP2	
Casie	

DEPARTMENT OF ECOLOGY

NOTICE OF CONSTRUCTION	)	ORDER
APPROVAL ORDER FOR:	)	No. DE 03AQIS-5813
WEYERHAEUSERCOMPANY	)	

To: J. Fred Cassidy
Vice President/Mill Manager
Weyerhaeuser Paper Company
P. O. Box 1000
Cosmopolis, Washington 98357

This is a Notice of Construction Approval Order issued in accordance with RCW 70.94.152 and WAC 173-400-114. A Notice of Construction Application (NOC) was received on September 26, 2003 and was determined to be complete on October 21, 2003.

The proposed project is for the construction of a baghouse to control emissions from the hogged fuel dryer. The purpose of the pollution control equipment is to control emission of metals by controlling particulate. The control of this unit is in lieu of controlling metals emissions from the recovery furnace. The Environmental Protection Agency (EPA) promulgated 40 CFR Part 63 Subpart MM (National Emission Standards for Hazardous Air Pollutant (HAPs) for the Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills on January 12, 2001. As part of these regulations, Weyerhaeuser Company at Cosmopolis, Washington was required to control particulate as a surrogate for HAPs emissions from their sulfite recovery furnace. On May 19, 2003 EPA promulgated a site specific rule allowing Weyerhaeuser to control the HAPs metals from their hogged fuel dryer instead of the recovery furnace HAPs emissions. The baghouse project does not change or modify the fluidized bed, a non combustion source. The modification of the pollution control equipment only affects the particulate.

The City of Cosmopolis and Ecology received the building permit and NOC application package for the hogged fuel dryer baghouse project at approximately the same time. Since the City of Cosmopolis will issue a building permit, the city is the lead agency. The City of Cosmopolis issued a Determination of Non significance. The comment period expired on November 17, 2003. No new information was obtained through public review.

Based on the complete NOC application and a technical analysis Ecology makes the following determinations regarding the project if constructed and operated as required in this order:

1. The project will meet all applicable federal and state rules and regulations including: General Regulations for Air Pollution Sources, Chapter 173-400 WAC; *New Source Performance Standards (NSPS), 40 CFR Part 60*; and, the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63 Subpart MM.

2. The project will use Reasonable Available Control Technology (RACT) as required under WAC 173-400-114 for particulate, *Toxic Best Available Control Technology (T-BACT) as required under WAC 173-460* for control of emissions, and the site specific rule promulgated by the US Environmental Protection Agency in the *National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63 Subpart MM* on February 18, 2003 with an effective date of May 19, 2003.

3. The emissions from the modified source will not cause or contribute to a violation of any ambient air quality standard.

The system must be fully operational on or before September 13, 2004.
The Notice of Construction is hereby approved for the hogged fuel dryer baghouse project.

Approval Conditions
THEREFORE, IT IS ORDERED that the project, as described in said Notice of Construction Application, is approved provided the following conditions are met:

A. EMISSION LIMITS
Particulate matter (PM) emissions are limited to 10 pounds/hour or less measured in the hogged fuel dryer stack.

B. VERIFICATION OF COMPLIANCE AND RECORDS

1. Weyerhaeuser shall continuously monitor the performance of the fabric filter using a bag leak detection system with audible alarm system

2. Weyerhaeuser must perform an initial compliance test using the test methods specified in the NESHAP to demonstrate that the PM from the hogged fuel dryer meet the alternative standard on or before December 12, 2004 and once per five years thereafter to determined compliance.

3. Weyerhaeuser must develop and implement a written startup, shutdown, and malfunction plan that contains specific procedures to be followed for operating and maintaining the hogged fuel dryer or fabric filter during periods of startup, shutdown, and malfunction, and a program of corrective action if the hogged fuel dryer or fabric filter malfunction.

4. Weyerhaeuser must take corrective action as specified in its startup, shutdown, and malfunction plan whenever the bag leak detection alarm sound.

5. For the bag leak detection system on the hog fuel dryer fabric filter at Weyerhaeuser Company's facility (Emission Unit no. HD-14), records of each alarm, the time of the alarm, the time corrective action was initiated and completed, and a brief description of the cause of the alarm and the corrective action taken.

6. The Cosmopolis mill will be in violation of the alternative standard if corrective action is not initiated within one (1) hour of a bag leak detection alarm, corrective action is not completed in accordance with the startup, shutdown, and malfunction plan, or the alarm is engaged for more than five (5) percent of the total operating time during a six (6) month block reporting period. In calculating the operating time fraction, if inspection of the fabric filter demonstrates that no corrective action is required, no alarm time is counted; if corrective action is required, each alarm is counted as a minimum of1 hour; if corrective action is not initiated within 2 hour, the alarm time is counted as the actual amount of time taken to initiate corrective action.

7. The compliance with the alternative standard for the hogged fuel dryer is compliance with 40 CFR 63 subpart MM for the HAPs emission requirements for the recovery boiler stack emissions.

C. LEAK DETECTION SYSTEM/SITE SPECIFIC MONITORING PLAN

The owner or operator of the affected hog fuel dryer at Weyerhaeuser Paper Company's Cosmopolis, Washington facility (Emission Unit no. HD-14) must meet the requirements in paragraphs 1 through 11 of this section for each bag leak detection system.

1. The owner or operator must install, calibrate, maintain, and operate each triboelectric bag leak detection system according to the "Fabric Filter Bag Leak Detection Guidance," (EPA-454/R-98-015, September 1997). This document is available from the U.S. Environmental Protection Agency (U.S. EPA); Office of Air Quality Planning and Standards; Emissions, Monitoring and Analysis Division; Emission Measurement Center, MD-D205-02, Research Triangle Park, NC 27711. This document is also available on the Technology Transfer Network under Emission Measurement Center Continuous Emission Monitoring. The owner or operator must install, calibrate, maintain, and operate other types of bag leak detection systems in a manner consistent with the manufacturer's written specifications and recommendations.

2. The bag leak detection system must be certified by the manufacturer to be capable of detecting PM emissions at concentrations of 10 milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less.

3. The bag leak detection system sensor must provide an output of relative PM loadings.

4. The bag leak detection system must be equipped with a device to continuously record the output signal from the sensor.

5. The bag leak detection system must be equipped with an audible alarm system that will sound automatically when an increase in relative PM emissions over a preset level is detected. The alarm must be located where it is easily heard by plant operating personnel.

6. For positive pressure fabric filter systems, a bag leak detector must be installed in each baghouse compartment or cell.

7. For negative pressure or induced air fabric filters, the bag leak detector must be installed downstream of the fabric filter.

8. Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.

9. The baseline output must be established by adjusting the range and the averaging period of the device and establishing the alarm set points and the alarm delay time according to section 5.0 of the "Fabric Filter Bag Leak Detection Guidance."

10. Following initial adjustment of the system, the sensitivity or range, averaging period, alarm set points, or alarm delay time may not be adjusted except as detailed in the site-specific monitoring plan. In no case may the sensitivity be increased by more than 100 percent or decreased more than 50 percent over a 365-day period unless such adjustment follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating condition. Record each adjustment.

11. The owner or operator must record the results of each inspection, calibration, and validation check.

D. RECORDKEEPING REQUIREMENTS

For the bag leak detection system on the hog fuel dryer fabric filter at Weyerhaeuser Paper Company's Cosmopolis, Washington facility (Emission Unit no. HD-14), records of each alarm, the time of the alarm, the time corrective action was initiated and completed, and a brief description of the cause of the alarm and the corrective action taken.

E. TEST METHODS FOR MACT II COMPLIANCE

For purposes of determining mass of PM emitted from the hog fuel dryer at Weyerhaeuser Paper Company's Cosmopolis, Washington facility (Emission Unit no. HD-14), Method 5 or 29 in appendix A of 40 CFR part 60 must be used, except that Method 17 in appendix A of 40 CFR part 60 may be used in lieu of Method 5 or Method 29 if a constant value of 0.009 g/dscm (0.004 gr/dscf) is added to the results of Method 17, and the stack temperature is no greater than 205 °C (400 ^{o}F). For Methods 5, 29, and 17, the sampling time and sample volume for each run must be at least 60 minutes and 0.90 dscm (31.8 dscf), and water must be used as the cleanup solvent instead of acetone in the sample recovery procedure.

F. ON-GOING COMPLIANCE PROVISION
Following the compliance date, owners or operators of the hog fuel dryer at Weyerhaeuser Paper Company's Cosmopolis, Washington facility (Emission Unit no. HD-14) are required to implement corrective action, as specified in the startup, shutdown, and malfunction plan prepared under § 63.866(a) if the bag leak detection system alarm sounds.

G. NOTIFICATION OF COMPLIANCE STATUS
Weyerhaeuser Company shall submit to Ecology applicable notifications from 40 CFR 63 subpart A. In addition to the requirements in subpart A of 40 CFR Part 63, the owner or operator of the hog fuel dryer at Weyerhaeuser Paper Company's Cosmopolis, Washington, facility (Emission Unit no. HD-14) must include analysis and supporting documentation demonstrating conformance with EPA guidance and specifications for bag leak detection systems in § 63.864(e)(12) in the submittal of the Notification of Compliance Status.

This order deletes the particulate testing on the hogged fuel dryer required by DE95AQ-I034 that placed a particulate limit (0.lgr/dscf) on the dryer after December 12, 2004. Compliance with the bag leak testing and compliance with particulate limit of 10 lb particulate will replace the particulate limit in DE95AQ-I034 for the hogged fuel dryer. The 10 lbs particulate is more restrictive than the 0.1 gr/dscf that was in Order DE95AQ-I034.

In accordance with WAC 173-400-171(1), public involvement was not deemed necessary and public notice was not made.

Failure to comply with this Order may result in the issuance of civil penalties or other actions, whether administrative or judicial, to enforce the terms of this Order.

Nothing in this order shall be construed to relieve Weyerhaeuser Company's mill at Cosmopolis of its obligations under any applicable state, local, or federal laws or regulations.

This order may be modified, suspended or revoked in whole or part for cause including, but not limited to, the following: Violation of any terms and conditions of this order or misrepresentation or failure to disclose fully all relevant facts in the Notice of Construction Application.

This Order shall become invalid if construction is not commenced within eighteen months after receipt of final approval, if construction is discontinued for a period of eighteen months or more, or if construction is not complete within eighteen months. Ecology may extend the construction period upon a satisfactory showing that an extension is justified. The provisions of this order are severable and, if any provision of this authorization, or application of any provision of this authorization to any circumstances, is held invalid, the application of such provision to their circumstances and the remainder of-this authorization shall not be affected thereby.

Appeal Process

This Order may be appealed. Your appeal must be filed with the Washington Pollution Control' Hearings Board (PCHB) within 30 days of receipt of this Order. The notice of appeal, to the PCHB, shall include, as attachments, a copy of this NOC Approval order, a copy of the NOC application, and any additional information submitted to Ecology in support of the application.

At the same time, a copy of the notice of appeal, without attachments, must be sent to the Department of Ecology. The addresses are listed below.

The Pollution Control Hearings Board
P.O. Box 40903
Olympia, Washington 98504-0903

Carol Kraege
Ecology
Industrial Section Manager
P.O. Box 47706
Olympia, Washington 98504-7600

Your appeal alone will not stay the effectiveness of this Order. Stay requests must be submitted in accordance with RCW 43.21B.320. These procedures are consistent with the provisions of Chapter 43.21B RCW.

DATED this 5th day of December, 2003 at Olympia, Washington

Carol Kraege, P.E.
Industrial Section Manager

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000
TTY 711 or 800-833-6388 (For the Speech or Hearing Impaired)

Facility: Weyco, Cosmo	
Year: 05	Left Right
Air	Corr
Water	Reports
NPDES	Permit
WET-Tox	Enf
DW/RCRA	Eng
Clean Up	Sub
SW	
HWP2	

May 19, 2005

CERTIFIED MAIL
7000 0520 0022 0743 6512

J. Fred Cassidy, Vice President/Mill Manager
Weyerhaeuser Paper Company
PO Box 1000
Cosmopolis, Washington 98357

Dear Mr. Cassidy:

Enclosed is Order No. 2484 AQ-05, which rescinds Order DE 01AQIS-3121, and changes order DE 95AQ-I034.

All correspondence relating to this document should be directed to:

Don Nelson at Department of Ecology, Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600.

If you have any questions concerning the content of the document, please call Mr. Nelson at (360) 407-6940.

Sincerely,

Carol Kraege, P.E.
Industrial Section Manager
Solid Waste & Financial Assistance Program

enclosure

DEPARTMENT OF ECOLOGY

IN THE MATTER OF AN ADMINSTRATIVE ORDER TO: Weyerhaeuser Company	)))	ORDER No. 2484 AQ-05

To: J. Fred Cassidy
Mill Manager/Vice President
Weyerhaeuser Company
Post Office Box 1000
Cosmopolis, Washington 98537

This Administrative Order requires Weyerhaeuser Company to take the actions described below to comply with the requirements in WAC 173-400-075, rescinds Order DE 01AQIS-3121, eliminates the time for soot blowing for the hog fuel boiler defined in Order No. DE 95AQ-1034, and changes the monitoring frequency of stack testing for particulate from the recovery furnaces emission point defined in Attachment B of Order No. DE 95AQ-1034 from monthly to quarterly.

RCW 70.94.141 authorizes the Department of Ecology (Department) to issue Administrative Orders to enforce the Washington Clean Air Act. The Department has determined that ORDER No. DE 01AQIS-3121 (MACT I order) did not cover the MACT I requirements defined in 40 CFR 63, Subpart S for the bleach plant emissions of HAP's. The bleaching regulation states that the MACT I bleach plant requirements are not applicable to the facility until three years after the revised federal effluent guidelines are promulgated. The type of bleaching required by the revised guidelines affects the mill emissions of chlorinated HAPs. The permittee is required to be in compliance with the MACT I bleach plant requirements [40 CFR Part 63, §63.440(d) (2)] as expeditiously as practical but in no event later than three years after the promulgation of the revised effluent standards for the dissolving grade sulfite mills. These requirements are specifically defined in 40 CFR Part 63, §63.445.

The effluent guidelines have not been promulgated for the dissolving sulfite pulp mill. Ecology considers that the effective date (November 12, 2003) of the active National Pollutant Discharge Elimination (NPDES) permit to be the start of the three year period for the Permittee to be in full compliance with the bleach plant emission requirements for HAP's. These requirements include the monitoring, recordkeeping, and reporting requirements necessary to assure compliance. Because the effluent guidelines will in all likelihood be further delayed and the NPDES permit limitations are expected to be very similar to the effluent guideline's requirements when they are promulgated, we are issuing this compliance order. The Permittee agreed to be in compliance with the MACT I bleaching system requirements by November 12, 2006.

Order number DE 01AQIS-3121 is an administrative order for compliance with MACT I pulping requirements. 40 CFR Part 63 Subpart S applies to and has all of the requirements related to compliance with the MACT requirements for the pulping system. Therefore, 40 CFR Part 63 Subpart S will be used to set limitations for the pulping system.

- Order number DE 01AQIS-3121 is hereby rescinded.

The time defined for soot blowing in footnote (c) Attachment B - Order No. DE 95AQ-I034 is modified by eliminating the specified time for soot blowing to allow the company to change the time that they will perform soot blowing with prior approval from Ecology.

- The specified time for soot blowing in footnote (c) Attachment B – Order No. DE 95AQ-I034 is hereby deleted.

From 1990 to present, except for 1998, particulate stack tests indicate that the probability of exceeding the particulate limit, given the amount of emission monitoring and the control configuration, is very low. The results of this data on the stack tests showed that 99 percent of the Method 5 particulate test results were less than 84 percent of the particulate limit. Ecology considers that the quarterly particulate test frequency is sufficient to indicate continuous compliance.

- The frequency in Attachment B - Order No. DE 95AQ-I034 under recovery furnace is modified to allow the company to change from monthly to quarterly stack testing.

THEREFORE, IT IS ORDERED that Weyerhaeuser Company, Cosmopolis shall comply with the following:

- be in compliance with 40 CFR 63, Subpart S for the bleach plant emissions of HAP's by November 12, 2006 (The November 12, 2006 date is three years after the effective date of the active NPDES permit);
- certify that they use no chlorine and hypochlorite chemicals by the compliance date; and,
- perform Method 5 particulate testing of the recovery furnaces quarterly.

Nothing in this order shall be construed to relieve Weyerhaeuser Company, Cosmopolis of its obligations under any applicable state, local, or federal laws or regulations.

Failure to comply with this Order may result in the issuance of civil penalties or other actions, whether administrative or judicial, to enforce the terms of this Order.

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

Appeal Process

This Order may be appealed. Your appeal must be filed with the Washington Pollution Control Hearings Board (PCHB) within 30 days of receipt of this Order. The notice of appeal, to the PCHB, shall include, as an attachment, a copy of this order. At the same time, a copy of the notice of appeal must be sent to the Department of Ecology. It is not necessary to send a copy of the Order to Ecology. The addresses are listed below.

The Pollution Control Hearings Board

P.O. Box 40903
Olympia, Washington 98504-0903

Carol Kraege
Ecology
Industrial Section Manager
P.O. Box 47706
Olympia, Washington 98504-7600

Your appeal alone will not stay the effectiveness of this Order. Stay requests must be submitted in accordance with RCW 43.21B.320. These procedures are consistent with the provisions of Chapter 43.21B RCW.

DATED this 19th day of May, 2005 at Olympia, Washington

Carol Kraege, P.E.
Industrial Section Manager