WASHINGTON DEPARTMENT OF ECOLOGY
MAIL STOP 7600
OLYMPIA, WASHINGTON 98504

IN THE MATTER OF AIR EMISSIONS FROM:

Port Townsend Paper Corporation)
100 Mill Road)
Port Townsend, WA 98368)

NOC ORDER
No. 7850

INTRODUCTION:

Port Townsend Paper Corporation (PTPC) owns and operates a Kraft pulp and paper mill located in Port Townsend, WA. PTPC formed a partnership with Sterling Energy Assets (SEA) in order to produce green electricity for sale to the power distribution system. The project does not result in increased pulp and paper production.

This Order approves a cogeneration project to produce the electricity. Steam from Power Boiler 10 (PB10) and the Recovery Furnace (RF) will drive a new steam turbine generator. After being used to generate electricity, the remaining steam at reduced pressure and temperature serves as the steam supply to support pulp and paper mill operations. The steam turbine will generate less than 25 MW of electricity for sale to any power distribution system.

The project requires changes within the mill. Changes include:

- PB10 - a new overfire air system to increase firing efficiency and allow the boiler to achieve its maximum continuous rating of 250,000 lbs per hr steam while firing wood alone. Reprocessed fuel oil (RFO) is expected to be used only in startup and emergency situations.

  After the project, the Power Boiler 10 will have a maximum firing rate of 414 MMBtu/hr (maximum sustained pre-project firing rate was 317 MMBtu/hr) producing superheater outlet steam of 600 psig and 750 deg F. ID and FD fans and feedwater pumps are also being upgraded. Also, noise silencers will be installed on PB10 steam vents.

  Pollution control upgrades include:
  - a new dry electrostatic precipitator (ESP) to control particulate matter (PM),
  - a new selective non-catalytic reduction (SNCR) system to control nitrogen oxides (NO_X) emissions, and
  - caustic solution addition at the existing scrubber to increase sulfur dioxide (SO_2) removal efficiency.

- Wood fuel handling system - modifications to improve transport efficiency within the mill site. Modifications resulting in fewer handling components and more direct routes include:
  - adding some new components,
  - removing some existing components,
  - relocating some existing components,
  - two new wood fuel storage piles, and

a new haul road route for trucks transporting hog fuel from the existing barge unloading system to the existing hog fuel storage pile.

RF - additional superheater tubes added to allow the Recovery Furnace to produce steam at higher temperature. There are no changes in the rate or amount of fuel (black liquor) fed to the unit. Less steam at higher temperature is produced. Higher temperature allows more efficient production of electricity. Pulp and paper production along with emissions from the unit are expected to remain the same.

Steam turbine - installed to generate <25 MW of electricity for sale to any power distribution system. The turbine will be located in an insulated building to minimize noise. A cooling tower associated with the turbine is also part of the project.

The NOC Application dated May 2010 along with additional supporting information includes a more in depth and complete description of the project and changes to the mill.

The Ecology Air Program determined a Prevention of Significant Deterioration (PSD) Permit is not required. Ecology determined the changes in mill operation necessary to complete the project require a NOC Order. The NOC Order limits project emissions and scope to that described in the application submitted by PTPC.

Authority for this Order comes from several sources:
WAC 173-400-110 - New source review (NSR).,
WAC 173-400-114 - Requirements for replacement or substantial alteration of emission control technology at an existing stationary source., and
RCW 70.94.141(3) which authorizes Ecology to issue such orders as may be necessary to effectuate the purpose of RCW 70.94.

FINDINGS:

Pursuant to New Source Review (NSR) regulations in the Washington Administrative Code (WAC) 173-400-110 and WAC 173-400-114, and based upon the complete Notice of Construction Application submitted by the PTPC and the technical analysis performed by the Department of Ecology (Department), the Department now finds the following:

1. A Notice of Construction (NOC) Application dated May 2010 was submitted by Trinity Consultants for the Port Townsend Mill. The application was received by the Washington State Department of Ecology (Ecology) Industrial Section and date stamped June 1, 2010. Additional information was submitted to support the application including a memorandum dated June 14, 2010. The application was determined to be complete on July 9, 2010. This Order is being issued in response to the May 2010 application and additional supporting information.

2. The PTPC mill has the potential to emit greater than 100 tons per year (T/yr) for at least one Prevention of Significant Deterioration (PSD) pollutant. The mill is therefore classified as a major stationary source under the PSD permitting program and is subject to PSD permitting consideration under Washington Administrative Code (WAC) 173-400-720 and 40 CFR 52.21. A PSD Permit is required if the project is a "major modification," (i.e., if the net emissions increase resulting from the modification is greater than the PSD Significant Emission Rate (SER) threshold for any regulated pollutant). PTPC included an analysis in

the May 2010 application that concluded a PSD Permit is not required for the project. The Ecology Air Program reviewed the PTPC project application and concluded *Ecology does not currently have any reason to object to the PSD applicability determination made by PTPC regarding the Cogeneration Project.* The Air Program Analysis is documented in a letter dated July 7, 2010 from Jeff Johnston to Eveleen Muehlethaler.

3. The application proposed changes in four areas of the mill:
   modifications to the RF,
   modifications to fuel and ash handling systems,
   modifications to PB10, and
   installation of the steam turbine and cooling tower.

4. Changes in RF emissions are not expected as a result of the project. Baseline emissions were calculated using actual throughput for each year in the baseline period. Typical throughput was approximately 312,000 TBLS/yr. RF modifications are to the heat collection system, with no changes made to fuel quality or quantity. Emission limits and monitoring currently required for the unit are not changed by this Order.

5. Changes to the fuel and ash handling systems were expected to result in fugitive emissions of particulates (PM, PM_{10}, and $PM_{2.5}$). Increases are due to increases in the amount of wood fuel (hog fuel, forest biomass, and urban wood) being brought to the site, being moved around the site, and being stored on the site. Ash hauling emissions are expected to decrease due to a new ash handling system at PB10 and transporting the ash for disposal by truck rather than front-end loader. Best management practices (BMPs) are determined to be Reasonably Available Control Technology (RACT) for fugitive particulate emissions associated with fuel and ash handling at the PTPC mill.

6. PB10 will continue to burn the same fuel types burned prior to this project. Fuel types include:

   Wood fuels including hog fuel, forest biomass, and urban wood. Ecology does not currently classify these wood fuels as solid waste. Wood fuels do not include wood treated with creosote, pentachlorophenol, or copper-chrome-arsenic; or municipal waste.

   Forest biomass means the by-products of current forest management activities, current forest protection treatments authorized by the agency, or the by-products of forest health treatment prescribed or permitted under Washington's forest health law. Forest biomass does not include municipal solid waste.

   Urban wood is purchased wood fuel meeting an acceptance program which prohibits wood treated with creosote, pentachlorophenol, or copper-chrome-arsenic; municipal waste, hazardous material contaminants (asbestos, lead, mercury), lead painted items, and plastic coatings.

   Oil, including reprocessed fuel oil (RFO).

   Primary sludge from the mill process wastewater treatment plant.

   Burnable rejects from the mill and the old corrugated container (OCC) recycle facility, which are processed to remove plastics and metal prior to use as a fuel.

   Any additional fuel types are subject to New Source Review rules and regulations prior to use.

7. PB10 will continue to be subject to 40 CFR Part 60 (NSPS) Subpart D - Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971. The modification proposed to PB10 will not increase the hourly mass emission rate of any pollutant to which a standard applies under 40 CFR Part 60. PB10 will not be reconstructed within the meaning of 40 CFR 60.15.

8. The PB10 maximum sustained firing rate before the project was 317 MMBtu/hr. The PB10 maximum firing rate after the project will be 414 MMBtu/hr.

9. PB10 carbon monoxide (CO) emissions will increase by 43 T/yr as a result of the project. Analysis of available CO controls found overfire air and proper operation of PB10 to be Best Available Control Technology (BACT) for CO. Projected actual CO emissions from PB10 after project completion are 635 tons/yr. CO emissions from PB10 were calculated based on a projected rate of 0.35 lb/MMBtu.

10. PB10 volatile organic compounds (VOC) emissions will increase by 1.1 T/yr as a result of the project. Analysis of available VOC controls found overfire air and proper operation of PB10 to be BACT for VOC. Projected actual VOC emissions from PB10 after project completion are 18.1 T/yr. VOC emissions from PB10 were calculated based on a projected rate of 0.010 lb/MMBtu.

11. PB10 particulate (PM) emissions will not increase as a result of the project. A new dry electrostatic precipitator (ESP) will be installed to control PM emissions. Projected actual PM emissions from PB10 after project completion are 27.2 T/yr compared to baseline emissions of 103.1 T/yr. Projected PM emissions from PB10 were calculated based on a long term average projected rate of 0.015 lb/MMBtu. The existing turbo-tac scrubber will no longer be operated at the quench H_2O flow, scrubber H_2O flow, and scrubber air flow previously approved to control particulate emissions. An ESP capable of controlling PM emission levels to 8.3 lb/hr (0.020 lb/MMBtu) and 36.4 T/yr is determined to be Reasonably Available Control Technology (RACT) for PTPC PB10. Compliance with RACT assures PM emissions from PB10 will not increase as a result of the project.

    Turbo -tac scrubber operational parameters had been used to demonstrate compliance with opacity limits and as compliance assurance monitoring (CAM) parameters for PM emissions. In the absence on scrubber parameter monitoring requirements, either a PM continuous emissions monitoring system (CEMS) or a continuous opacity monitoring system (COMS) will be required.

    Emission rates for PM_{10} and $PM_{2.5}$ were estimated to be the same as the PM emissions.

12. PB10 nitrogen oxides (NO_X) emissions will not increase as a result of the project. A new selective non-catalytic reduction (SNCR) system will be installed to control NO_X emissions. Projected actual NO_X emissions from PB10 after project completion are 236 T/yr compared to baseline emissions of 263.9 T/yr. Projected NO_X emissions from PB10 were calculated based on a long term average projected rate of 0.13 lb/MMBtu. A SNCR system capable of controlling NO_X emission levels to 62.1 lb/hr (0.150 lb/MMBtu) and 262 T/yr is determined to be RACT for PTPC PB10. Compliance with RACT assures NO_X emissions from PB10 will not increase as a result of the project.

    NH3 will be added to the exhaust stream for NO_X control. Projected actual NH3 emissions

from PB10 after project completion are 31.4 T/yr. NH3 emissions from PB10 are calculated based on a projected concentration of 25 ppmv.

13. PB10 sulfur dioxide (SO_2) emissions will not increase as a result of the project. Improved caustic addition to the current scrubber will be installed to control SO_2 emissions. Projected actual SO_2 emissions from PB10 after project completion are 73 T/yr compared to baseline emissions of 98.0 T/yr. Projected SO_2 emissions from PB10 are calculated based on long term average projected rates of 0.025 lb/MMBtu when non-condensible gasses (NCGs) are not being burned in the unit, and 0.055 lb/MMBtu when non-condensible gasses (NCGs) are being burned in the unit. NCGs are expected to be burned in the unit approximately 50% of the time. A caustic addition system capable of controlling SO_2 emission levels to 11.6 lb/hr (0.028 lb/MMBtu) when NCGs are not being burned in the unit, 22.8 lb/hr (0.055 lb/MMBtu) when NCGs are being burned in the unit, and 96 T/yr is determined to be RACT for SO_2 control at PTPC PB10. Compliance with RACT assures SO_2 emissions from PB10 will not increase as a result of the project.

    Also, PB10 sulfuric acid (H_2SO_4) emissions will not increase as a result of the project. The SO_2 emissions control system will also adequately control H_2SO_4 emissions. Projected actual H_2SO_4 emissions from PB10 after project completion are 1.7 T/yr.

14. PB10 total reduced sulfur (TRS) and hydrogen sulfide (H_2S) emissions will not increase as a result of the project. TRS and H_2S emissions are not usually associated with power boilers. Any sulfur compounds entering the boiler are expected to be oxidized during combustion forming SO_2. Projected actual TRS and H_2S emissions from PB10 after project completion are each 0.5 T/yr.

15. Toxic air pollutants (TAPs) were evaluated for the project. Emission increases due to the project were calculated and compared to "small quantity emission rate" (SQER) *de minimus* levels in WAC 173-460-150. Those TAPs exceeding the *de minimus* level were analyzed using the SCREEN3 model. All TAPs modeled were found to be a levels less than the acceptable source impact level (ASIL) in WAC 173-460-150.

    Because all TAPs emissions are projected to be less than the SQER or less than the ASIL based on SCREEN3 modeling, there are no further requirements for TAPs as a result of the analysis. Toxic effects are not expected at the emission rates projected for the project.

16. Emissions control devices are being added to PB10 as part of this project. An applicability analysis of and compliance with 40 CFR Part 64 - Compliance Assurance Monitoring regulations will be necessary after the control devices are installed and operating.

17. A steam turbine expected to generate <25 MW/hr of electricity for sale to any power distribution system will be installed. Due to rate of generation, PB10 is not considered a utility unit (see 40 CFR 72.2) and is therefore not subject to Acid Rain Program limitations found in 40 CFR Part 72.

18. A new cooling tower will be installed to serve the turbine.

    Potential PM emissions from the new cooling tower will be 1.3 T/yr. Analysis of available PM controls found proper operation and mist eliminators are BACT. Potential PM emissions from the cooling tower after project completion were calculated based on a drift rate of

0.001%. A mist eliminator system capable of controlling the drift rate to 0.0005% is determined to be BACT for cooling tower PM control.

All PM emissions from the cooling tower are assumed to be $PM_{2.5}$.

19. Terms and conditions of this Order are considered "federally enforceable" for Title 5 Air Operating Permit (AOP) purposes unless specifically identified as a "state only" term or condition.

20. An environmental checklist was submitted with the NOC application for Ecology consideration of environmental impacts of the project as required by the State Environmental Policy Act (SEPA - see chapter 43.21C RCW). A Determination of Nonsignificance (DNS) was made and issued on July 9, 2010. An Environmental Checklist with supplemental information was submitted by PTPC on September 22, 2010. On September 23, 2010, the July 9, 2010 DNS was withdrawn. A DNS was made and issued on September 23, 2010.

Therefore, it is ordered that the project, as described in said Notice of Construction dated May 2010 and more specifically detailed in additional information submitted to the Department and on reference thereto, is approved for construction, installation, and operation, provided the following conditions are met:

CONDITIONS:

Note: footnotes and clarification of methods are contained in Appendix A.

1. The requirements in this condition apply to PB10. The limits specified in this condition shall not be exceeded. The limits shall be monitored at the monitoring frequency and with the compliance test methods specified. Reporting shall be as specified for each parameter.

	Parameter	Limit (shall not exceed)	Monitoring & Reporting[1]
1.1	Particulate	8.3 lb/hr, 24-hr average.	Either: Sample monthly[2] using 40 CFR 60, Appendix A, Method 5 except that the permittee may conduct one test of at least one hour in lieu of three 1-hour tests. The source tests shall be conducted when the unit is operating at ≥95% of the maximum hourly rate the unit operated at since the prior source test. Each source test result shall represent a 24-hr average for comparison to the limit. Report test results monthly. or Monitor continuously using Performance Specification 11 of 40 CFR, Part 60, Appendix B and Quality Assurance Procedures in 40 CFR, Part 60, Appendix F- Procedure 2 (or other published alternative Performance Specification and Quality Assurance Procedures with Ecology approval). Report 24-hr average emission rates and excursions monthly.
		36.4 T/yr, 12-mth rolling average.	Same monitoring as for previous limit. Report 12-mth rolling average monthly.
1.2	Opacity	Average 20% for more than 6 consecutive minutes in any 60 minute period, except for emissions due to soot blowing or grate cleaning for up to 15 minutes in 8 consecutive hours.	Either: Monitor continuously between the ESP and scrubber using Performance Specification 1 of 40 CFR, Part 60, Appendix B and Quality Assurance Procedures in 40 CFR, Part 60, Appendix F. Report daily maximum opacities, daily average opacities, and excursions monthly. or Monitor continuously using Performance Specification 11 of 40 CFR, Part 60, Appendix B and Quality Assurance Procedures in 40 CFR, Part 60, Appendix F- Procedure 2 (or other published alternative Performance Specification and Quality Assurance Procedures with Ecology approval). PM limit compliance and reporting also satisfies opacity limit compliance and reporting. Note: 40 CFR 60.45(5) approval is necessary for this option to be used to demonstrate compliance with a NSPS opacity limit. For either case - compliance may also be determined using 40 CFR Part 60, Appendix A, Method 9.

	Parameter	Limit (shall not exceed)	Monitoring & Reporting[1]
1.3	SO_2	11.6 lb/hr, 3-hr average when no NCGs are burned during the 3-hr period.	Monitor continuously using Performance Specification 2 of 40 CFR, Part 60, Appendix B and Quality Assurance Procedures in 40 CFR, Part 60, Appendix F. Report 3-hr average emission rates and excursions monthly.
		22.8 lbs/hr, 3-hr average when any NCGs are burned during the 3-hr period.	Monitor continuously using Performance Specification 2 of 40 CFR, Part 60, Appendix B and Quality Assurance Procedures in 40 CFR, Part 60, Appendix F. Report 3-hr average emission rates and excursions monthly.
		96 T/yr, 12-mth rolling average.	Same monitoring as for previous limit. Report 12-mth rolling average monthly.
1.4	NO_x	62.1 lb/hr, 30-day rolling average.	Monitor continuously using Performance Specification 2 of 40 CFR, Part 60, Appendix B and Quality Assurance Procedures in 40 CFR, Part 60, Appendix F. Report daily average emission rates, 30-day rolling average emissions rates, maximum 30-day rolling average emission rate, and excursions monthly.
		262 T/yr, 12-mth rolling average.	Same monitoring as for previous limit. Report 12-mth rolling average monthly.
1.5	CO	145 lb/hr, 8 hr average.	Monitor continuously using Performance Specification 4 of 40 CFR, Part 60, Appendix B and Quality Assurance Procedures in 40 CFR, Part 60, Appendix F. Report 8-hr average emission rates, maximum 8-hr average emission rate, and excursions monthly.
		635 T/yr 12-mth rolling average.	Same monitoring as for previous limit. Report 12-mth rolling average monthly.
1.6	VOC	4.1 lb/hr, 3-hr average.	Test within 60 days of the limit going into effect and 3 years thereafter, using 40 CFR 60, Appendix A, Method 25, 25A, or 25B. Each source test result shall represent a 3-hr average for comparison to the limit. The source tests shall be conducted when the unit is operating at ≥95% of the maximum hourly rate the unit operated at since the prior source test. Report results in the monthly report for month when the test was conducted. Source test frequency shall change to monthly[2] if a violation of this limit occurs.
		18.1 T/yr, 12-mth rolling average.	Same monitoring as for previous limit. Report 12-mth rolling average monthly.
1.7	NH3	25 ppmv @ 7% O_2, 24-hr average.	Test within 60 days of the limit going into effect and annually thereafter, using Bay Area Air Quality Management District (BAAQMD) Source Test Procedure ST-1B or alternative method approved by Ecology. Each source test result shall represent a 24-hr average for comparison to the limit. The source tests shall be conducted when the unit is operating at ≥95% of the maximum hourly rate the unit operated at since the prior source test. Report results in the monthly report for month when the test was conducted. Source test frequency shall change to monthly[2] if a violation of this limit occurs.

1.8 For the first 5 full calendar years after Condition 1 limits go into effect PTPC shall:
record the annual calendar year emissions of Particulate, SO_2, NO_x, CO, and VOC from PB10,
compare the calendar year emissions to baseline emissions submitted in the NOC application dated May 2010 to confirm that any emissions increases do not exceed a SER listed in 40 CFR 52.21, and
report within 45 days of the end of the calendar year, if the emission increase from PB10 of any pollutant listed in this condition exceeds the SER for that pollutant.

The limits in Condition 1 shall go into effect upon completion of the work on PB10 described in the project application and prior to operating the steam turbine on a production basis.

2. The requirements in this condition apply to the cooling tower. The limits specified in this condition shall not be exceeded. The limits shall be monitored at the monitoring frequency and with the compliance test methods specified. Reporting shall be as specified for each parameter.

	Parameter	Limit (shall not exceed)	Monitoring & Reporting
2.1	Particulate	Drift rate <0.0005%.	Submit manufacturer's certification of mist eliminator drift rate prior to installation. Notify Ecology of planned changes that could affect mist eliminator drift rate at least 30 days prior to making changes.
2.2	HAPs/TAPs	No chemicals added to water with listed HAPs/TAPs	Annually submit a list of chemicals used with an ingredient comparison to HAP/TAP list in WAC 173-460.

3. With each monthly air report for January, report annual average MW of electricity generated by the steam turbine. If the annual average is 25 MW of electricity or more, PTPC must reassess the applicability of the Acid Rain Program regulations (40 CFR Part 72) and any other regulations and requirements triggered by the level of electricity generation reported.

4. Notify Ecology in writing within 7-days of completing project work on PB10.

   Also, notify Ecology in writing within 7-days of operating the steam turbine on a production basis.

5. Within 6 months of the limits in Condition 1 going into effect, PTPC shall develop and implement a plan to minimize fugitive emissions due to changes made to mill site associated with the project. The plan shall be maintained at the mill site and updated as necessary. The plan shall be made available for Ecology review upon request.

6. Within 9 months of the limits in Condition 1 going into effect, PTPC shall update their compliance assurance monitoring plan (CAM Plan, see 40 CFR Part 64) to reflect mill changes associated with this order. A copy of the revised plan shall be sent to Ecology for review.

7. Within 1 year of the limits in Condition 1 going into effect, PTPC shall conduct an initial source test on PB10 using 40 CFR 60, Appendix A, Method 202 - Condensible Particulate Matter (or an alternative test method approved by Ecology). At least two more source tests shall be conducted within 3-years of the initial test. Subsequent tests shall be at least 1 year after the prior test. The source tests shall be conducted when the unit is operating at ≥95%

of the maximum hourly rate the unit operated at since limits in Condition 1 went into effect. The initial test date may be postponed until 3-months after final EPA approval of the test method if the method is not approved within the 1 year time frame. A copy of the source test data, results, and the calculated ratio of (PM_{10} and $PM_{2.5}$) to (PM) during the test shall be submitted to Ecology within 60 days of each test. The tests serve to determine a baseline emission rate for condensable particulates (PM_{10} and $PM_{2.5}$) and to establish a ratio of (PM_{10} and $PM_{2.5}$) to (PM) for the unit.

8. Ecology may approve alternate compliance test methods that are of equivalent stringency for any air pollutant. Compliance monitoring frequency may be adjusted by Ecology depending on compliance history.

9. Operating and maintenance (O&M) manuals for all equipment added or modified by this project, that has the potential to affect emissions to the atmosphere, shall be developed and followed. Copies of the manuals shall be available to the Department. Emissions that result from a failure to follow the requirements of the manuals may be considered proof that the equipment was not properly operated and maintained.

   All urban wood purchased by PTPC must meet an acceptance program included as part of the PB10 O&M manual. The acceptance program must include acceptance criteria which at a minimum prohibits wood treated with creosote, pentachlorophenol, or copper-chrome-arsenic; municipal waste, hazardous material contaminants (asbestos, lead, mercury), lead painted items, and plastic coatings. The acceptance program must be incorporated into the O&M manual within 90-days of this Order being signed. Also, a copy of the acceptance program must be submitted to Ecology within 90-days of receipt of this Order. Any changes to the acceptance program must be submitted to Ecology prior to instituting the changes.

10. Access to the source by the U.S. Environmental Protection Agency (EPA), Ecology, or local regulatory personnel shall be permitted upon request and presentation of proper credentials for the purpose of compliance assurance inspections. Failure to allow access is grounds for revocation of this determination of approval.

11. At all times, including periods of startup, shutdown, and upset, PTPC shall, to the extent practicable, maintain and operate all equipment that is capable of contributing to air pollution in a manner consistent with good air pollution control practice for minimizing emissions. During periods of upset PTPC shall take immediate and appropriate corrective action to minimize emissions, including slowing or shutting down the emission unit.

12. Ecology may modify conditions contained herein, pursuant to legal requirements, based on air quality, emissions monitoring results, or upon the request of PTPC.

13. 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 order.

14. This approval shall become invalid if construction of the project is not commenced within eighteen (18) months after receipt of final approval, or if construction of the facility is discontinued for a period of eighteen (18) months, unless Ecology extends the 18-month period upon a satisfactory showing that an extension is justified.

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.

Authorization may be modified, suspended or revoked in whole or 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 or failure to disclose fully all relevant facts.

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

APPEAL PROCESS

You have a right to appeal this Order to the Pollution Control Hearing Board (PCHB) within 30 days of the date of receipt of this Order. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

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

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

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

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

Address and Location Information:

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

More Information:

- **Pollution Control Hearings Board**
  www.eho.wa.gov/Boards_PCHB.aspx
- **Chapter 43.21B RCW, Environmental Hearings Office – Pollution Control Hearings Board**
  http://apps.leg.wa.gov/RCW/default.aspx?cite=43.21B
- **Chapter 371-08 WAC – Practice and Procedure**
  http://apps.leg.wa.gov/WAC/default.aspx?cite=371-08
- **Chapter 34.05 RCW – Administrative Procedure Act**
  http://apps.leg.wa.gov/RCW/default.aspx?cite=34.05
- **Chapter 70.94 RCW, Washington Clean Air Act**
  http://apps.leg.wa.gov/RCW/default.aspx?cite=70.94
- **Air Quality Rules**
  www.ecy.wa.gov/laws-rules/ecywac.html#air

SIGNATURE

Teddy Le, P.E.
Acting Industrial Section Manager
Waste 2 Resources Program

10/22/10
Date

Reviewed by:

Marc Heffner, P.E.
Industrial Section Environmental Engineer
Waste 2 Resources Program

10/22/10
Date

APPENDIX A - Footnotes

1. Monitoring is required only when emission unit is operating.

2. If monitored emissions are equal to or less than 75% of the emission limitation for any six consecutive months, emissions may be monitored quarterly. Quarterly tests must be conducted between 45 and 105 days after the previous test. Permittee may conduct one test of at least one hour in lieu of three 1-hour tests. Report results in monthly report for month tested.

   If monitored emissions are less than or equal to 50% of the emission limitation for any four consecutive quarters, emissions may be monitored annually. Annual tests must be conducted between 10 and 14 months after the previous test. Permittee may conduct one test of at least one hour in lieu of three 1-hour tests. Report results in monthly report for month tested.

   If monitored emissions exceed the allowed percent threshold to qualify for the reduced monitoring frequency in effect, the monitoring frequency must be revised. The revised frequency shall be the frequency the test result qualifies for based on the original permit condition and this footnote.