

**Weyerhaeuser NR Company**  
**Weyerhaeuser Longview Lumber**  
**Air Operating Permit**  
**SW18-23-R0**

**Issued: June 18, 2019 (FINAL)**

Southwest Clean Air Agency  
11815 NE 99 Street, Suite 1294  
Vancouver, WA 98682-2322  
Telephone: (360) 574-3058

AIR OPERATING PERMIT #: SW18-23-R0

ISSUED TO: Weyerhaeuser NR Company  
PO Box 931  
Longview, WA 98632

PLANT SITE: Weyerhaeuser Longview Lumber  
2901 Industrial Way  
Longview, WA 98632

NATURE OF BUSINESS: Dimensional Lumber Manufacturing

SIC / NAICS CODE: 2421 / 321113

AIRS NUMBER: TBD

EFFECTIVE DATE: June 18, 2019

EXPIRATION DATE: June 18, 2024

RENEWAL APPLICATION DUE: June 18, 2023

PERMIT ENGINEER: *Wess Safford*  
Wess Safford, Air Quality Engineer

6/18/19  
Date

REVIEWED BY: *Paul T. Mairose*  
Paul T. Mairose, Chief Engineer

6/18/19  
Date



APPROVED BY: *Uri Papish*  
Uri Papish, Executive Director

6/18/19  
Date

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## I. ABBREVIATIONS

### List of Common Abbreviations

ADP	Air Discharge Permit
AOP	Air Operating Permit
BACT	Best Available Control Technology
CFR	Code of Federal Regulations
CO	Carbon monoxide
Ecology	Washington State Department of Ecology
EPA	U.S. Environmental Protection Agency
EU	Emission unit
EU#	Refers to a specific emission unit numbered "#"
FCAA	Federal Clean Air Act
G#	Refers to a specific general term or condition numbered "#"
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous air pollutant
IEU	Insignificant emission unit
IEU#	Refers to an insignificant emission unit numbered "#"
K#	Refers to a specific recordkeeping term or condition numbered "#"
M#	Refers to a specific monitoring term or condition numbered "#"
MMBtu	Million British thermal units
MSDS	Material safety data sheet
N#	Refers to a specific nonapplicable requirement numbered "#"
NO <sub>x</sub>	Oxides of nitrogen
NSR	New Source Review
O <sub>2</sub>	Oxygen
P#	Refers to a specific permit provision numbered "#"
PM	Particulate matter
PM <sub>10</sub>	Particulate matter less than 10 microns in diameter
PM <sub>2.5</sub>	Particulate matter less than 2.5 microns in diameter
ppmvd	Parts per million by volume, dry
PTE	Potential to emit
R#	Refers to a specific reporting term or condition numbered "#"
RACT	Reasonably available control technology
RCW	Revised Code of Washington
Req #	Refers to a specific applicable requirement numbered "#"
SO <sub>2</sub>	Sulfur dioxide
SIP	State implementation plan
SWCAA	Southwest Clean Air Agency
TAP	Toxic air pollutant
tpy	Tons per year
VOC	Volatile organic compound
WAC	Washington Administrative Code

Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations.

## II. REGULATORY BASIS

This Air Operating Permit (AOP), hereafter referred to as the "Permit", is authorized under the procedures established in WAC 173-401 and Title V of the Federal Clean Air Act (FCAA). The terms and conditions of this permit describe the emissions limitations, operating requirements, ambient monitoring, recordkeeping requirements, and reporting frequencies for the permitted source. Permit terms and conditions are divided into the following categories: General Terms and Conditions, Operating Terms and Conditions, Monitoring Terms and Conditions, Recordkeeping Terms and Conditions, and Reporting Terms and Conditions. As used in this Permit, "term", "condition", "standard", and "requirement" have the same meaning as "applicable requirement" specified under 40 Code of Federal Regulations (CFR) 70.2 and WAC 173-401-200.

The Permit is intended to contain a comprehensive list of the local, state, and federal air pollution regulations and standards applicable to the permittee's facility and to assure and provide for certification of compliance with those requirements. Sections V through IX describe the applicable requirements and cite the originating local, state, or federal regulation or requirement. Federal requirements may be direct (e.g., FCAA or CFR citation) or established under the Washington State Implementation Plan (SIP). Each citation in the table also includes one or two effective dates for the cited regulation. Where there are two dates for the same regulatory citation, the underlying requirement is substantially the same, but the date of the regulation used for enforcement purposes would be different (e.g., federally enforceable versus SWCAA enforceable).

SWCAA is the primary authority for enforcement of all requirements listed in the Permit (federal, state, and local). However, EPA and private citizens may also take enforcement actions under the Permit for those requirements that are federally enforceable; federal regulations, regulations that have a SIP date, and terms of ADPs are federally enforceable. Rules, regulations, and permits that are not SIP approved or federally promulgated are not federally enforceable.

The following table lists the title and effective dates of regulations applicable to the facility:

<u>Regulation/Permit</u>	<u>SIP/Federal Effective Date</u>	<u>State/Local Effective Date</u>	<u>Notes / Exceptions</u>
<b><i>Federal Regulations</i></b>			
40 CFR 51	7/1/2017	--	Not Delegated
40 CFR 52	7/1/2017	--	Not Delegated
40 CFR 60 Subpart A	7/1/2017	10/9/2016	Delegated
40 CFR 60 Subpart IIII	7/1/2017	10/9/2016	Delegated
40 CFR 60 Subpart KKKK	7/1/2017	10/9/2016	Delegated
40 CFR 63 Subpart A	7/1/2017	10/9/2016	Delegated
40 CFR 63 Subpart ZZZZ	7/1/2017	10/9/2016	Delegated (Title V Sources Only)
40 CFR 68	7/1/2017	--	Not Delegated

<u>Regulation/Permit</u>	<u>SIP/Federal Effective Date</u>	<u>State/Local Effective Date</u>	<u>Notes / Exceptions</u>
<b><i>State Regulations</i></b>			
WAC 173-400-105(7)	7/1/2016	7/1/2016	
WAC 173-400-117	7/1/2016	7/1/2016	
WAC 173-400-171	7/1/2016	7/1/2016	
WAC 173-400-700	4/1/2011	7/1/2016	
WAC 173-401	--	3/5/2016	
WAC 173-441	--	3/1/2015	
WAC 173-476	7/1/2016	7/1/2016	
<b><i>Local Regulations</i></b>			
WAC 173-460	--	8/21/1998	Local implementation of previous state rule
SWCAA 400-030	10/9/2016	6/18/2017	SIP approval excludes Sections (21) and (129)
SWCAA 400-036	10/9/2016	6/18/2017	
SWCAA 400-040	10/9/2016	6/18/2017	SIP approval excludes Sections (1)(c), (1)(d), (2), and (4)
SWCAA 400-050	10/9/2016	6/18/2017	SIP approval excludes Sections (3), (5) and (6)
SWCAA 400-060	10/9/2016	6/18/2017	
SWCAA 400-070	10/9/2016	6/18/2017	SIP approval excludes Sections (2)(a), (3)(b), (5), (6), (7), (8)(c), (9), (10), (11), (12), (14) and (15)(c)
SWCAA 400-072	10/9/2016	6/18/2017	SIP approval excludes Sections (5)(a)(ii)(B), (5)(d)(ii)(B), (5)(d)(iii)(A), (5)(d)(iii)(B)
SWCAA 400-075	--	6/18/2017	
SWCAA 400-076	--	6/18/2017	
SWCAA 400-081	10/9/2016	6/18/2017	
SWCAA 400-091	10/9/2016	6/18/2017	
SWCAA 400-100	--	6/18/2017	
SWCAA 400-101	--	6/18/2017	
SWCAA 400-103	--	6/18/2017	
SWCAA 400-105	10/9/2016	6/18/2017	
SWCAA 400-106	10/9/2016	6/18/2017	SIP approval excludes remainder of rule sections
Sections (1)(a), (1)(b), (1)(c)			
SWCAA 400-107	9/21/1995	6/18/2017	
SWCAA 400-109	10/9/2016	6/18/2017	SIP approval excludes Sections (3)(d), (3)(e)(ii) and (4)
SWCAA 400-110	10/9/2016	6/18/2017	SIP approval excludes Section (1)(d)
SWCAA 400-113	10/9/2016	6/18/2017	SIP approval excludes Section (5)
SWCAA 400-114	10/9/2016	6/18/2017	

<u>Regulation/Permit</u>	<u>SIP/Federal Effective Date</u>	<u>State/Local Effective Date</u>	<u>Notes / Exceptions</u>
SWCAA 400-115	--	6/18/2017	
SWCAA 400-116	10/9/2016	6/18/2017	
SWCAA 400-120	--	6/18/2017	
SWCAA 400-130	10/9/2016	6/18/2017	
SWCAA 400-131	10/9/2016	6/18/2017	
SWCAA 400-136	10/9/2016	6/18/2017	
SWCAA 400-151	10/9/2016	6/18/2017	
SWCAA 400-161	10/9/2016	6/18/2017	
SWCAA 400-171	10/9/2016	6/18/2017	SIP approval excludes Section (2)(a)(xii)
SWCAA 400-200	10/9/2016	6/18/2017	
SWCAA 400-205	10/9/2016	6/18/2017	
SWCAA 400-270	10/9/2016	6/18/2017	
SWCAA 425	--	6/18/2017	
SWCAA 476	--	6/19/2017	
SWCAA 400, Appendix A	10/9/2016	6/18/2017	

**Ecology Orders**

Order 12950	12/18/2015	12/18/2015
Order 10371	3/14/2014	3/14/2014
Order 4372 Amendment 1	6/28/2010	6/28/2010
Order 97AQ-I087 Amendment 1	9/15/2008	9/15/2008
Order 95AQ-I079	2/8/1996	2/8/1996

**III. EMISSIONS UNIT IDENTIFICATION**

<b>ID</b>	<b>Generating Equipment/Activity</b>	<b>Emission Control</b>
EU1	Lumber Dry Kilns	Process Temperature Control
EU2	Planer Mill - Material Collection Systems	Process Enclosure, High Efficiency Filtration
EU3	Planer Mill - Anti-Sapstain Spray Systems	Process Enclosure, Demister, High Transfer Efficiency Spray Equipment
EU4	Sawmill - Trimmer Saw Dust Collection System	Process Enclosure, High Efficiency Filtration
EU5	Sawmill - Wood Residual Bins	Process Enclosure, Wind Shrouds
EU6	Emergency Fire Pumps	Low Sulfur Fuel, Limited Operation

## IV. PERMIT PROVISIONS

40 CFR 51.212

### **P1. Credible Evidence**

40 CFR 52.12, 40 CFR 52.33

For the purposes of submitting compliance certifications or establishing whether a violation of any term or condition of this permit has occurred or is occurring, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether the permittee would have been in compliance with a specific term or condition if the appropriate performance or compliance test or procedure would have been performed.

### **P2. Insignificant Emission Unit - Restriction**

WAC 173-401-530(6)

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

### **P3. Permit Duration**

WAC 173-401-610

This permit shall be valid for a fixed term of five years from the date of issuance.

WAC 173-401-500(5)

WAC 173-401-620(2)(e)

### **P4. Confidentiality of Records and Information**

SWCAA 400-270

The permittee is responsible for clearly identifying information that is considered proprietary and confidential prior to submittal to SWCAA. Requests for proprietary and confidential information shall be released only after legal opinion by SWCAA's legal counsel, and notice to the permittee of the intent to release or deny the release of information.

In the case where the permittee has submitted information to SWCAA under a claim of confidentiality, SWCAA may also require the source to submit a copy of such information directly to the EPA Administrator.

Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permittee 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)

SWCAA 400-103

### **P5. Standard Provisions**

- (a) *Duty to comply.* The permittee must comply with all conditions of this Chapter 401 permit. Any permit noncompliance constitutes a violation of Revised Code of Washington (RCW) Chapter 70.94 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.
- (b) *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.



- (c) *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.
- (d) *Property rights.* This permit does not convey any property rights of any sort, or any exclusive privilege.
- (e) *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 permittee or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70.94.205.
- (f) *Permit fees.* The permittee shall pay fees in accordance with RCW 70.94.162 as a condition of this permit in accordance with the permitting authority's fee schedule. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in RCW 70.94.430 and 70.94.431.
- (g) *Emission 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.
- (h) *Severability.* If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable.
- (i) *Permit appeals.* This permit or any conditions in it may be appealed only by filing an appeal with the Pollution Control Hearings Board and serving it on the permitting authority within thirty days of receipt of the permit pursuant to RCW 43.21B.310. This provision for appeal in this section is separate from and additional to any federal rights to petition and review under § 505(b) of the FCAA.
- (j) *Permit continuation.* This permit and all terms and conditions contained herein shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect until the renewal permit has been issued or denied if a timely and complete application has been submitted.

**P6. Federally Enforceable Requirements****WAC 173-401-625**

- (a) All terms and conditions in an air operating permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the FCAA, except as indicated in paragraph (b) below.
- (b) Any terms and conditions included in this permit that are not required under the FCAA or under any of its applicable requirements are not federally enforceable under the FCAA. Terms and conditions so designated are not subject to the EPA and affected states review requirements of WAC 173-401-700 through WAC 173-401-820. Terms that are SWCAA enforceable only are marked as "local only".

**P7. Permit Shield****WAC 173-401-640**

Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements that are specifically identified in this permit as of the date of permit issuance. Nothing in this permit shall alter or affect the following:

- (a) The provisions of Section 303 of the FCAA (emergency orders), including the authority of the Administrator under that section;
- (b) The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- (c) The applicable requirements of the acid rain program, consistent with Section 408(a) of the FCAA;
- (d) The ability of EPA to obtain information from a source pursuant to Section 114 of the FCAA; and
- (e) The ability of the permitting authority to establish or revise requirements for the use of reasonably available control technology (RACT) as defined in RCW 70.94.

**P8. Emergency Provision****WAC 173-401-645**

An "emergency" as defined in WAC 173-401-645(1) shall constitute an affirmative defense to an action brought for noncompliance with technology-based emission limitations. The burden of proof lies with the permittee. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- (a) An emergency occurred, and the permittee can identify the causes(s) of the emergency;
- (b) The permitted facility was at the time being properly operated;
- (c) During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (d) The permittee submitted notice of the emergency to the permitting authority within two working days of the time when emission limitations were exceeded due to the emergency or shorter periods of time specified in an applicable requirement. This notice fulfills the requirement of WAC 173-401-615(3)(b) unless the excess emissions represent a potential threat to human health and safety. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

**WAC 173-401-705(2)****P9. Permit Expiration – Application Shield****WAC 173-401-710(3)**

Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with WAC 173-401-710(1) and WAC 173-401-500. All terms and conditions of the permit shall remain in effect after the permit expires if a timely and complete permit application has been submitted. Operation under the terms and conditions of the expired permit will be allowed until SWCAA takes final action on the renewal application.

**P10. Permit Revocation****WAC 173-401-710(4)**

The permitting authority may revoke a permit only upon the request of the permittee or for cause. The permitting authority shall provide at least thirty days written notice to the permittee prior to revocation of the permit or denial of a permit renewal application. Such notice shall include an explanation of the basis for the proposed action and afford the permittee an opportunity to meet with the permitting authority prior to the authority's final decision. A revocation issued under this section may be issued conditionally with a future effective date and may specify that the revocation will not take effect if the permittee satisfies the specified conditions before the effective date.

**P11. Reopening for Cause****WAC 173-401-730**

This permit shall be reopened and revised under any of the following circumstances:

- (a) Additional applicable requirements become applicable to a major air operating permit source with a remaining permit term of 3 or more years. Such a 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 to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit;
- (c) The permitting authority or Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
- (d) The Administrator or the permitting authority determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings under this section shall not be initiated before a notice of such intent is provided to the AOP source by the permitting authority. Such notice shall be made at least 30 days in advance of the date that the permit is to be reopened, except that the permitting authority may provide a shorter time period in the case of an emergency.

**WAC 173-401-722****P12. Changes Not Requiring Permit Revision / Off Permit Changes****WAC 173-401-724**

The permittee may make changes as described in WAC 173-401-722 and WAC 173-401-724 without revising this Permit, provided that the changes satisfy the criteria set forth in those sections, including the requirements to notify SWCAA and EPA. Changes made by the permittee under WAC 173-401-724 do not qualify for a permit shield.

**P13. Excess Emissions****SWCAA 400-107**

Excess emissions due to startup or shutdown conditions or due to scheduled maintenance shall be considered unavoidable provided the source reports as required under by SWCAA 400-107(1) and adequately demonstrates that the excess emissions could not have been prevented or avoided. This provision does not apply to federal standards.

Excess emissions due to upsets shall be considered unavoidable provided that the permittee reports as soon as possible but no later than 48 hours after discovery, and adequately demonstrates that:

- (a) The event was not caused by poor or inadequate design, operation, or maintenance, or any other reasonably preventable conditions;
- (b) The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance;
- (c) The operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded; and
- (d) The owner or operator(s) actions in response to the excess emissions were documented by properly signed, contemporaneous operating logs, or other relevant evidence.

## V. GENERAL TERMS AND CONDITIONS

### **G1. Certification of Submittals** **WAC 173-401-520**

All application forms, reports, and compliance certifications must be certified by a responsible official. Certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information contained in the submittal are true, accurate, and complete.

### **G2. Duty to Supplement or Correct Application** **WAC 173-401-500(6)**

The permittee, upon becoming aware that relevant facts were omitted, or incorrect information was submitted in a permit application, shall promptly submit such supplementary facts or corrected information. In addition, the permittee shall provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a draft permit.

### **G3. Inspection and Entry** **WAC 173-401-630(2)** **SWCAA 400-105(2) & (3)**

The permittee shall allow inspection and entry, upon presentation of credentials and other documents as may be required by law, by the permitting authority or an authorized representative to perform the following:

- (a) Enter upon the permittee's premises where an air operating permit 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 SWCAA 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.

### **G4. Schedule of Compliance** **WAC 173-401-510(2)(h)(iii)** **WAC 173-401-630(3)**

The permittee shall continue to comply with all applicable requirements with which the source is currently in compliance, and meet on a timely basis any applicable requirements that become effective during the permit term.

### **G5. Permit Renewal** **WAC 173-401-710(1)**

The permittee shall submit a complete permit renewal application to SWCAA no later than the date identified below.

This permit expires on June 18, 2024. A renewal application is due on June 18, 2023. A complete renewal application is due no later than December 18, 2023.

### **G6. Transfer of Ownership or Operational Control** **WAC 173-401-720(1)(d)**

A change in permittee due to transfer of ownership or operational control of an affected source requires a request for administrative permit amendment as governed by WAC 173-401-720(1)(d).

**G7. Misrepresentation and Tampering** **SWCAA 400-105(5) & (6)**

The permittee shall not make any false material statement, representation or certification in any form, notice, or report. The permittee shall not render inaccurate any monitoring device or method required under Chapter 70.94 RCW, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto.

WAC 173-400-700

WAC 173-460 (Effective 8/21/1998) (Local Only)

**G8. New Source Review** **SWCAA 400-109, SWCAA 400-800**

The permittee shall not construct or modify a source which is required to be reviewed under WAC 173-400-700, WAC 173-460 (effective 8/21/1998), SWCAA 400-109 or SWCAA 400-800 without first receiving an approval or permit under such provisions. Portable sources may be exempt from this requirement if they fulfill the criteria described in G9. This requirement is not applicable to emission units that comply with the provisions of SWCAA 400-072.

SWCAA 400-036

**G9. Portable Sources** **SWCAA 400-110(6)**

Portable sources which locate temporarily at the site of an air operating permit source shall be allowed to operate at the temporary location without filing an Air Discharge Permit application provided that:

- (a) The source/emissions units are registered with SWCAA;
- (b) The source/emission units have an air discharge permit to operate as a portable source or have an approved permit that meets the requirements of SWCAA 400-036;
- (c) The owner(s) or operator(s) notifies SWCAA of the intent to operate at the new location at least ten business days prior to starting the operation; and
- (d) The owner(s) or operator(s) supplies sufficient information including production quantities and hours of operation, to enable SWCAA to determine that the operation will comply with the emission standards for a new source, and will not cause a violation of applicable ambient air quality standards and, if in a nonattainment area, will not interfere with scheduled attainment of ambient standards.

**Replacement or Substantial Alteration of Emission Control****G10. Technology at an Existing Stationary Source** **SWCAA 400-114**

Prior to replacing or substantially altering emission control technology or equipment installed at an existing stationary source or emission unit, the permittee shall file an air discharge permit application with SWCAA. Construction shall not commence on a project subject to review until SWCAA issues a final air discharge permit or other regulatory order. However, any air discharge permit application filed under this section shall be deemed to be approved without conditions if the Agency takes no action within thirty (30) days of receipt of a complete application.

**G11. Maintenance of Process Equipment** **SWCAA 400-116(1)**

Any process equipment, including features, machines, and devices constituting parts of or called for by plans, specifications, or other information submitted for approval or required as part of an approval shall be maintained and operate in good working order. The Agency reserves the right to take any and all appropriate action to maintain compliance with approval conditions, including directing the facility to cease operations of defective or malfunctioning equipment until corrective action can be completed.

**G12. Maintenance of Control Equipment** **SWCAA 400-116(2)**

Emission units identified in this Permit shall be maintained and operated in total and continuous conformity with the conditions identified in this Permit. Any equipment that serves as air contaminant control or capture equipment shall be maintained and operated in good working order at all times in accordance with good operations and maintenance practices and in accordance with Agency approval conditions. The Agency reserves the right to take any and all appropriate action to maintain compliance with approval conditions, including directing the facility to cease operations of defective or malfunctioning equipment until corrective action can be completed.

**G13. Outdoor Burning** **SWCAA 425 (Local Only)**

The permittee is prohibited from conducting outdoor burning except as allowed by SWCAA 425.

**G14. Asbestos** **40 CFR 61, Subpart M  
SWCAA 400-075, SWCAA 476**

The permittee shall comply with the provisions of SWCAA 476 "Standards for Asbestos Control, Demolition and Renovation" when conducting any renovation, demolition or asbestos storage activities at the facility.

**G15. Protection of Stratospheric Ozone** **40 CFR 82, Subparts B & F**

The permittee shall comply with the standards for recycling and emissions reduction as provided in 40 CFR 82, Subparts B and F.

**G16. Chemical Accident Prevention Program** **40 CFR 68**

The permittee shall comply with the requirements of the Chemical Accident Prevention Provisions of 40 CFR 68 no later than the following dates:

- (a) Three years after the date on which a regulated substance, present above the threshold quantity, is first listed under 40 CFR 68.130; or
- (b) The date on which a regulated substance is first present above a threshold quantity in a process.

**VI. OPERATING TERMS AND CONDITIONS**

The following table lists all federal, state, and/or locally enforceable requirements applicable to the permittee. The effective date for each applicable requirement is listed in Section II of this Permit. The applicable legal authority is listed below each requirement. Applicable requirements identified as having "plantwide" applicability apply to both EUs and IEUs.

Some of the requirements have been partially adopted into the Washington State Implementation Plan (SIP). Only those parts adopted into the Washington SIP are federally enforceable. Requirements which are not required under the FCAA are denoted as state or local only. Monitoring requirements are intended to provide a reasonable assurance of compliance with the applicable requirements, and may or may not involve the use of a reference test method.

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 1	<p>The permittee shall not cause or permit the emission of an air contaminant that exceeds 20% opacity for more than 3 minutes (aggregate) in any one-hour period, except as provided in SWCAA 400-040(1).</p> <p>Reference Method: SWCAA Method 9</p> <p>[SWCAA 400-040(1)]</p>	Plantwide	M1
Req 2	<p>The permittee shall not cause or permit fallout of particulate matter beyond the source's property boundary in sufficient quantity to interfere unreasonably with use and enjoyment of the property on which the fallout occurs.</p> <p>[SWCAA 400-040(2) - <i>Local Only</i>]</p>	Plantwide	M2
Req 3	<p>The permittee shall take reasonable precautions to prevent the release of air contaminants from any operation that emits fugitive emissions.</p> <p>[SWCAA 400-040(3)]</p>	Plantwide	M2
Req 4	<p>Operations that cause or contribute to a nuisance odor shall use recognized good practice and procedures to reduce these odors to a reasonable minimum.</p> <p>[SWCAA 400-040(4) - <i>Local Only</i>]</p>	Plantwide	M3
Req 5	<p>The permittee shall not cause or permit the emission of any air contaminant detrimental to persons, property or business.</p> <p>[SWCAA 400-040(5)]</p>	Plantwide	M3
Req 6	<p>The permittee shall not cause or permit the installation or use of any means which conceals or masks an emission which would otherwise violate any provisions of SWCAA 400-040.</p> <p>[SWCAA 400-040(7)]</p>	Plantwide	Compliance Certification
Req 7	<p>The permittee shall take reasonable precautions to prevent emissions of fugitive dust and operate the source to minimize emissions.</p> <p>[SWCAA 400-040(8)(a)]</p>	Plantwide	M2

Req. #	Applicable Requirement	Emission Point	Monitoring														
Req 8	<p>The permittee shall not cause or allow emissions of particulate matter from a general process unit in excess of 0.1 gr/dscf of exhaust gas.</p> <p>Reference Method: EPA Method 5</p> <p>[SWCAA 400-060]</p>	Plantwide	M1														
Req 9	<p>The permittee shall not 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.</p> <p>[SWCAA 400-205]</p>	Plantwide	Compliance Certification														
Req 10	<p>The permittee shall maintain and operate the lumber dry kilns in a manner consistent with good air pollution control practices for minimizing emissions at all times.</p> <p>[Order 97AQ-I087 Amendment 1]</p>	EU1	Compliance Certification														
Req 11	<p>Visible emissions from the lumber dry kilns shall not exceed 10% opacity for more than 3 minutes (aggregate) in any one-hour period.</p> <p>Reference Method: EPA Method 9</p> <p>[Order 97AQ-I087 Amendment 1, Condition 2]</p>	EU1	M1														
Req 12	<p>Emissions from operation of the lumber dry kilns shall not exceed the following:</p> <table border="0" data-bbox="324 1333 812 1596"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>VOC</td> <td>140 tpy</td> </tr> <tr> <td>Acetaldehyde</td> <td>10 tpy</td> </tr> <tr> <td>Acrolein</td> <td>1 tpy</td> </tr> <tr> <td>Formaldehyde</td> <td>1 tpy</td> </tr> <tr> <td>Methanol</td> <td>17 tpy</td> </tr> <tr> <td>Propionaldehyde</td> <td>1 tpy</td> </tr> </tbody> </table> <p>Reference Method: EPA OTM 26</p> <p>[Order 97AQ-I087 Amendment 1, Condition 2]</p>	<u>Pollutant</u>	<u>Emission Limit</u>	VOC	140 tpy	Acetaldehyde	10 tpy	Acrolein	1 tpy	Formaldehyde	1 tpy	Methanol	17 tpy	Propionaldehyde	1 tpy	EU1	M4
<u>Pollutant</u>	<u>Emission Limit</u>																
VOC	140 tpy																
Acetaldehyde	10 tpy																
Acrolein	1 tpy																
Formaldehyde	1 tpy																
Methanol	17 tpy																
Propionaldehyde	1 tpy																
Req 13	<p>The maximum temperature of drying schedules used in the lumber dry kilns shall not exceed 212 °F.</p> <p>[Order 97AQ-I087 Amendment 1, Condition 2]</p>	EU1	M4														



Req. #	Applicable Requirement	Emission Point	Monitoring				
Req 14	<p>The lumber dry kilns shall only process western hemlock and Douglas fir lumber.</p> <p>Processing of other wood species is subject to Agency review and approval. Prior to initiating the drying of other wood species in the kilns, permittee must submit information to the Agency sufficient to establish species specific emission factors and to quantify potential emissions changes resulting from the change in wood species. New Source Review shall be required if drying of other species would result in an increase in emissions</p> <p>[Order 97AQ-I087 Amendment 1, Condition 2]</p>	EU1	M4				
Req 15	<p>Emissions from the Planer #18 shavings system baghouse shall not exceed the following:</p> <table border="0" data-bbox="337 789 833 863"> <tr> <td style="text-align: center;"><u>Pollutant</u></td> <td style="text-align: center;"><u>Emission Limit</u></td> </tr> <tr> <td style="text-align: center;">PM/PM<sub>10</sub></td> <td style="text-align: center;">0.1 gr/dscf</td> </tr> </table> <p>Reference Method: EPA Method 5</p> <p>[Order 12950, Table 1]</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM/PM <sub>10</sub>	0.1 gr/dscf	EU2	M1, M5
<u>Pollutant</u>	<u>Emission Limit</u>						
PM/PM <sub>10</sub>	0.1 gr/dscf						
Req 16	<p>Visible emissions from the Planer #19 dust collection system baghouse shall not exceed 10% opacity for more than 3 minutes (aggregate) in any one-hour period.</p> <p>Reference Method: EPA Method 9</p> <p>[Order 10371, Table 1]</p>	EU2	M1, M5				
Req 17	<p>The permittee shall develop and follow operating and maintenance manuals for all equipment that has the potential to affect emissions to the atmosphere. Copies of the manuals shall be available to the permitting authority. Emissions above permitted levels 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.</p> <p>[Order 10371, Condition 6] [Order 12950, Condition 3]</p>	EU2, EU3	Compliance Certification				

Req. #	Applicable Requirement	Emission Point	Monitoring								
Req 18	<p>The Planer #19 dust collection system baghouse shall be equipped with sampling ports that meet the requirements of 40 CFR, Part 60, Appendix A, Method 1. Adequate permanent and safe access to the test ports shall be provided. Other arrangements may be acceptable if approved by the permitting authority prior to installation.</p> <p>[Order 10371, Condition 7]</p>	EU2	Compliance Certification								
Req 19	<p>Emissions from operation of the Planer #18 anti-sapstain spray system shall not exceed the following:</p> <table border="0" data-bbox="332 646 922 793"> <tr> <td><u>Pollutant</u></td> <td><u>Emission Limit</u></td> </tr> <tr> <td>VOC</td> <td>22.5 tpy</td> </tr> <tr> <td>Ethanol</td> <td>2.30 lb/hr, 19,700 lb/yr</td> </tr> <tr> <td>Petroleum Naphtha</td> <td>1.36 lb/hr, 11,700 lb/yr</td> </tr> </table> <p>[Order 95AQ-I079, Appendix A]</p>	<u>Pollutant</u>	<u>Emission Limit</u>	VOC	22.5 tpy	Ethanol	2.30 lb/hr, 19,700 lb/yr	Petroleum Naphtha	1.36 lb/hr, 11,700 lb/yr	EU3	M6
<u>Pollutant</u>	<u>Emission Limit</u>										
VOC	22.5 tpy										
Ethanol	2.30 lb/hr, 19,700 lb/yr										
Petroleum Naphtha	1.36 lb/hr, 11,700 lb/yr										
Req 20	<p>Emissions from operation of the Planer #19 anti-sapstain spray system shall not exceed the following:</p> <table border="0" data-bbox="332 966 824 1039"> <tr> <td><u>Pollutant</u></td> <td><u>Emission Limit</u></td> </tr> <tr> <td>VOC</td> <td>31.9 tpy</td> </tr> </table> <p>[Order 10371, Table 1]</p>	<u>Pollutant</u>	<u>Emission Limit</u>	VOC	31.9 tpy	EU3	M6				
<u>Pollutant</u>	<u>Emission Limit</u>										
VOC	31.9 tpy										
Req 21	<p>Fugitive and overspray emissions from anti-sapstain spray systems shall be controlled by operating the overspray chamber mist collection, demister, and recirculation system whenever the spray systems are in service.</p> <p>[Order 95AQ-I079, Appendix A] [Order 10371, Table 1]</p>	EU3	Compliance Certification								
Req 22	<p>Good practices and procedures shall be used to reduce odors from anti-sapstain spray system operation to a minimum.</p> <p>[Order 95AQ-I079, Appendix A] [Order 10371, Table 1]</p>	EU3	M3								
Req 23	<p>Emissions from the trimmer saw dust collection system baghouse shall not exceed the following:</p> <table border="0" data-bbox="332 1724 824 1797"> <tr> <td><u>Pollutant</u></td> <td><u>Emission Limit</u></td> </tr> <tr> <td>PM/PM<sub>10</sub></td> <td>0.005 gr/dscf</td> </tr> </table> <p>Reference Method: EPA Method 5</p> <p>[Order 4372 Amendment 1]</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM/PM <sub>10</sub>	0.005 gr/dscf	EU4	M1, M7				
<u>Pollutant</u>	<u>Emission Limit</u>										
PM/PM <sub>10</sub>	0.005 gr/dscf										

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 24	<p>Sawmill wood residual bin loadout stations shall be equipped with two-sided wind shrouds or walls to minimize fugitive dust emissions.</p> <p>[Order 4372 Amendment 1]</p>	EU5	M8
Req 25	<p>Fugitive dust from mobile source operation on gravel surfaces shall be controlled via watering.</p> <p>[Order 4372 Amendment 1]</p>	EU5	M8
Req 26	<p>Emergency fire pumps shall be equipped with a non-resettable hour meter to record hours of operation.</p> <p>[40 CFR 63.6625(f)] [SWCAA 400-075]</p>	EU6	Compliance Certification
Req 27	<p>Emergency fire pumps may operate without limit in response to emergency situations.</p> <p>Emergency fire pumps may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. Operation for maintenance checks and readiness testing may not exceed 100 hours per calendar year.</p> <p>Emergency fire pumps may be operated for up to 50 hours per year in nonemergency situation. Nonemergency operation is counted against the 100 hours per calendar year allowance for maintenance and readiness testing.</p> <p>[40 CFR 63.6640(f)] [SWCAA 400-075]</p>	EU6	M10
Req 28	<p>The permittee shall minimize the time the emergency fire pumps spend at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.</p> <p>[40 CFR 63.6625(h)] [SWCAA 400-075]</p>	EU6	M10

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 29	<p>Emergency fire pumps shall be operated and maintained according to the manufacturer's emission-related written instructions or a facility specific maintenance plan that provides for the maintenance and operation of the Emergency Generator in a manner consistent with good air pollution control practice for minimizing emissions.</p> <p>[40 CFR 63.6605(b), 40 CFR 63.6625(e)]  [40 CFR 63.6640(a)]  [SWCAA 400-075]</p>	EU6	M10
Req 30	<p>The permittee shall conduct the following maintenance for the emergency fire pumps:</p> <p>(a) Change oil and filter every 500 hours of operation or annually, whichever comes first. An oil analysis program as described in 40 CFR 63.6625(i) may be utilized in lieu of the proscribed intervals.</p> <p>(b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first. Replace as necessary.</p> <p>(c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first. Replace as necessary.</p> <p>[40 CFR 63.6603(a), Table 2c]  [40 CFR 63.6640(a)]  [SWCAA 400-075]</p>	EU6	M10

## VII. MONITORING TERMS AND CONDITIONS

To assure compliance with all applicable requirements, the permittee shall perform the monitoring program specified below. Specified monitoring is not required whenever an emission unit is not operated during a time period equal to or greater than the designated monitoring period. For these periods, the permittee shall record and report the reason why and the length of time the emission unit was not operated. Pursuant to WAC 173-401-530(2)(c), monitoring requirements are not applicable to IEUs unless specified below.

The permittee shall make a record of all required monitoring activities as described in Section VIII of this permit.

### **M1. General Visible Emissions Monitoring** **WAC 173-401-615(1)**

This monitoring requirement applies to Reqs 1, 8, 11, 15, 16, 23.

This monitoring requirement is applicable to both EU's and IEUs.

On a monthly basis, the permittee shall perform a brief qualitative observation of affected emission units during daylight hours for the purpose of identifying potential visible emissions violations. Based upon the qualitative observation, the permittee shall take one or more of the following actions:

- (a) If no visible emissions are observed, the permittee shall make a record of the observation, and no further action is necessary.
- (b) If visible emissions are observed, the permittee shall identify the source of the emissions, and confirm whether or not the pertinent equipment is experiencing a malfunction and that all relevant air pollution control equipment is operating properly. The permittee shall take corrective action to resolve the problem within 24 hours of initial discovery, and shall notify SWCAA regarding its progress in resolving the problem.
- (c) Subsequent to taking corrective action, the permittee shall perform a second qualitative observation of affected emission units. If no visible emissions are observed, then no further action is necessary. If visible emissions are still observed, the permittee shall demonstrate compliance with applicable visible emission limits by conducting a visible emissions evaluation in accordance with SWCAA Method 9 within 72 hours of initial discovery. For visible emissions in compliance with applicable visible emission limits, no further action is necessary.

If observed visible emissions are demonstrated to be out of compliance with applicable visible emissions limits, the permittee shall report an excess emission as described in Section R1 and make a record of the event. Additional adjustments, repairs, and/or maintenance shall be performed as soon as practical to reduce the visible emissions to a level at or below the applicable opacity limit.

Implementation of corrective action does not shield the permittee from enforcement action by SWCAA or from the obligation of reporting permit deviations as specified in WAC 173-401-615(3).

**M2. General Fugitive Emissions/Particulate Matter Monitoring WAC 173-401-615(1)**

This monitoring requirement applies to Reqs 2, 3, 7.

This monitoring requirement is applicable to both EU's and IEUs.

On a monthly basis, or in response to a complaint, the permittee shall perform an inspection of affected emission units during daylight hours for the purpose of identifying fugitive emissions, odors, fallout and potential violations of applicable particulate matter emission limits. Based upon results of the inspection, the permittee shall take one or more of the following actions:

- (a) If no visible emissions, odor or fallout are observed, affected emission units are assumed to be in compliance with applicable emission limits. The permittee shall make a record of the observation and no further action is necessary.
- (b) If visible emissions, odor or fallout are observed during an inspection, the permittee shall verify the emission unit or process that is the source of emissions and any associated air pollution control equipment are operating properly. If the equipment is not operating properly, the permittee shall resolve the problem no later than 24 hours after initial discovery, or notify SWCAA by the next business day of the progress made in resolving the problem. Subsequent to resolving the problem, a second inspection shall be made. If visible emissions, odor or fallout are still observed, the permittee shall continue to make adjustments and/or repairs until such time as the affected emission unit is demonstrated to be in compliance. Reasonable precautions and good work practices shall be employed to minimize emissions for the duration of the event.

Implementation of corrective action does not relieve the permittee from the obligation of reporting permit deviations as specified in WAC 173-401-615(3).

**M3. General Complaint Monitoring****WAC 173-401-615(1)**

This monitoring requirement applies to Reqs 4, 5, 22.

This monitoring requirement is applicable to both EU's and IEUs.

The permittee shall record, and maintain record of, any air quality related complaints received by either the permittee or SWCAA. All complaints shall be investigated no later than 1 work day after the permittee has been notified. The permittee shall determine the validity of each complaint and the cause of any emissions that may have prompted the complaint, and initiate appropriate corrective action in response to the complaint. Within 24 hours of notification and investigation, permittee shall resolve the subject of the complaint, or notify SWCAA by the next working day of progress made in resolving the complaint.

**Lumber Dry Kilns****M4. Emission Monitoring****Order 97AQ-I087 Amendment 1**

This monitoring requirement applies to Reqs 12, 13, 14.

The permittee shall:

1. Record the quantity and species of lumber dried in the dry kilns each year (MMbf); and
2. Continuously monitor dry kiln dry bulb temperature when in use.

Emissions from lumber drying shall be calculated by multiplying annual dry kiln production by the appropriate species-specific emission factors. Unless otherwise approved in writing by the permitting authority, emission calculations shall use the species-specific emissions factors listed below.

Pollutant	Emission Factor (lb/MMBF)	
	Hemlock	Douglas Fir:
VOC (OTM-26)	323	922
Acetaldehyde	120	54.7
Acrolein	1.5	0.7
Formaldehyde	1.3	2.0
Methanol	195	112
Propionaldehyde	1.2	0.5

**Planer Mill - Material Collection Systems****Order 10371****M5. Emission Monitoring****Order 12950**

This monitoring requirement applies to Req 15, 16.

The permittee shall conduct an initial emission test of the Planer #18 shavings system baghouse using EPA Reference Method 5. Test results shall be reported to the permitting authority within 90 days of test completion. The required emission testing was conducted on October 4 and 6, 2016. Tested particulate matter emissions were 0.00006 gr/dscf (0.023 lb/hr).

The permittee shall conduct an initial emission test the Planer #19 dust collection system baghouse for PM, PM<sub>10</sub> and opacity using an independent testing firm within 60 days after achieving maximum production, but not later than 180 days after startup. The required emission testing was conducted on November 18, 2003. Tested particulate matter emissions were 0.0007 gr/dscf (0.406 lb/hr).

The permittee shall inspect the Planer #18 shavings system baghouse at least once per calendar week when the planer line is in operation. Weekly inspection records must include the following:

- Date and time of inspection;
- Inspector(s) name/initials;
- Observed pressure drop across the baghouse. The permittee must initiate corrective action within 24 hours when the pressure drop exceeds 4 inches of water. Failure to initiate corrective action within 24 hours may be a violation of the requirement;
- Whether there were any visible emissions from the baghouse (Y/N);
- Other deficiencies, as appropriate; and
- Follow-up action(s) to be performed by inspector, as appropriate.

The permittee shall record the following for each material collection system baghouse:

1. Annual hours of operation;
2. The results of each performance test;
3. Inspection results;
4. Upset conditions; and
5. Maintenance activities.

Emissions from each baghouse shall be calculated from recorded hours of operation, baghouse discharge rate and the most recent emission test results.

#### **Planer Mill - Anti-Sapstain Spray Systems**

**Order 95AQ-I079**

#### **M6. Emission Monitoring**

**Order 10371**

This monitoring requirement applies to Reqs 19, 20.

The permittee shall record the following:

1. Weekly quantity of anti-sapstain chemicals used in the common anti-sapstain supply system for Planer #18 and Planer #19;
2. Weekly quantity of lumber processed in the Planer #18 and Planer #19 anti-sapstain systems;
3. Weekly concentration of anti-sapstain chemical applied to lumber processed in the Planer #18 and Planer #19 anti-sapstain systems;
4. Monthly air emissions;
5. Upset conditions; and
6. Maintenance, inspection and calibration activities.

Emissions from the Planer #18 anti-sapstain system shall be calculated using the following equation:

$$\text{Emissions} = \frac{\text{total anti-sapstain usage (gal)} \times \text{VOC content (lb/gal)} \times \text{Line \#18 treated lumber (MMBF)}}{\text{total Planer Mill treated lumber (MMBF)}}$$

Emissions from the Planer #19 anti-sapstain system shall be calculated using the following equation:

$$\text{Emissions} = \frac{\text{total anti-sapstain usage (gal)} \times \text{VOC content (lb/gal)} \times \text{Line \#19 treated lumber (MMBF)}}{\text{total Planer Mill treated lumber (MMBF)}}$$

**Sawmill - Trimmer Saw Dust Collection System****M7. Emission Monitoring****Order 4372 Amendment 1**

This monitoring requirement applies to Req 23.

The permittee shall conduct an initial emission test of the trimmer saw dust collection system baghouse for PM upon start-up to confirm function of the emission control system. The required emission testing was conducted in November 2008. Tested particulate matter emissions were 0.0007 gr/dscf (0.115 lb/hr).

The permittee shall record the following for the baghouse:

1. Annual hours of operation;
2. The results of each performance test;
3. Inspection results;
4. Upset conditions; and
5. Maintenance activities.

Emissions from the baghouse shall be calculated from recorded hours of operation, baghouse discharge rate and the results of the most recent emission test.

**Sawmill – Wood Residual Bins****M8. Operations Monitoring****Order 4372 Amendment 1**

This monitoring requirement applies to Req 24, 25.

The permittee shall record the following:

1. Maintenance activities for residual bin wind shrouds/walls;
2. Quantity and type of wood residual throughput; and
3. Log sheets for the watering of gravel surfaces associated with wood residual loadout.

**Sawmill****WAC 173-401-724(5)****M9. Significant Emissions Increase Monitoring****Order 4372 Amendment 1**

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 this permit, and the emissions resulting from those changes.

**Emergency Fire Pumps****40 CFR 63.6655****M10. Emission Monitoring****40 CFR 63.6660, Table 6**

This monitoring requirement applies to Reqs 27, 28, 29, 30.

The permittee shall monitor and record the following information for the Emergency Fire Pump Engines:

1. The number of hours of engine operation in each calendar year. Each hour of operation shall be classified as emergency or nonemergency, including what classified the operation as emergency;
2. The occurrence and duration of each malfunction of operation;
3. Actions taken during periods of malfunction to minimize emissions; and
4. Each incidence of maintenance and repairs conducted according to the manufacturer's emission related operation and maintenance instructions or the facility developed maintenance plan.



## VIII. RECORDKEEPING TERMS AND CONDITIONS

The permittee shall maintain files of all information, including all reports and notifications, recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Pursuant to WAC 173-401-530(2)(c), recordkeeping requirements are not applicable to IEUs unless specified below.

### General Recordkeeping

**WAC 173-401-615(2)**

The permittee is required to keep the following records as applicable:

- (a) Inspections and Certifications
  - (1) Date and time of the inspection or certification;
  - (2) Name and title of the person who conducted the inspection or certification;
  - (3) Identification of the unit or activity being inspected or certified;
  - (4) Operating conditions of the unit or the type of activity occurring at the time of the inspection or certification;
  - (5) Compliance status of each monitored requirement as described in Sections V and VII of this Permit; and
  - (6) Description of corrective action (if any) taken in response to a discovered permit deviation, excess emission, upset condition, or malfunction, as applicable.
- (b) Complaints
  - (1) Date and time of complaint;
  - (2) Name of the complainant;
  - (3) The nature of the complaint;
  - (4) Date and time of follow-up inspection;
  - (5) The name and title of the person who conducted the follow-up inspection; and
  - (6) Description of corrective action (if any) taken in response to complaint.
- (c) Sampling and Emissions Testing
  - (1) Date sampling was performed;
  - (2) Entity that performed the sampling;
  - (3) Name and title of the person or the entity that performed the sampling or testing;
  - (4) Analytical techniques used to take the sample;
  - (5) Operating conditions existing at the time of sampling or measurement to include, as a minimum for emission point source testing:
    - (A) Heat input (million Btu/hr) (EU-1);
    - (B) Fuel consumption rate (EU-1);
    - (C) Air discharge flowrate (dry standard cubic feet);
    - (D) Exhaust temperature of emissions out the stack (EU-1);
    - (E) Unit load on an hourly basis (EU-1);
  - (6) Date analytical analyses (if any) were performed;
  - (7) Entity that performed the analyses;
  - (8) Analytical techniques or methods used;
  - (9) Results of such analyses;
  - (10) Compliance status of each monitored requirement as described in Section V and VII of this permit; and
  - (11) Description of corrective action taken in response to permit deviations and when action was initiated.

- (d) Periodic Monitoring and Emissions Records
  - (1) Date and time of parameter observation or emission calculation;
  - (2) Name of parameter observed, or emission calculated;
  - (3) Observed parameter value or calculated emission value with appropriate units; and
  - (4) Periods that data was unavailable.
- (e) Excess Emissions and Upset Conditions
  - (1) Date and time of excess emission or upset condition occurred;
  - (2) Nature of the excess emission or upset condition and an identification of the affected unit, process, or activity; and
  - (3) Description of corrective action taken in response to a discovered permit deviation, excess emission, upset condition, or malfunction, as applicable.
- (f) Maintenance Activities
  - (1) Date and time of the maintenance activity;
  - (2) Name of the person who performed the maintenance;
  - (3) Identification of the unit or activity being maintained; and
  - (4) Description of the maintenance being conducted.

## IX. REPORTING TERMS AND CONDITIONS

All required reports must be certified by a responsible official consistent with WAC 173-401-520. Where an applicable requirement requires reporting more frequently than once every six months, the responsible official's certification need only be submitted once every six months, covering all required reporting since the date of the last certification. Where a reporting schedule is specified (e.g. quarterly, semi-annual, or annual), compliance with the reporting frequency is met when reports are submitted more frequently than required. Pursuant to WAC 173-401-530(2)(c), reporting requirements are not applicable to IEUs unless specified below.

Reports shall be submitted to the following addresses, unless otherwise instructed:

Control Officer  
 Southwest Clean Air Agency  
 11815 NE 99 Street, Suite 1294  
 Vancouver, WA 98682

Clean Air Act Compliance Manager  
 U.S. EPA Region 10, Mail Stop: OCE-101  
 1200 Sixth Avenue, Suite 155  
 Seattle, WA 98101

**WAC 173-401-615(3)**

### **R1. Deviations from Permit Conditions**

**SWCAA 400-107**

The permittee shall report deviations from permit conditions to SWCAA no later than thirty days after the end of the month during which the deviation is discovered. Deviations that represent a potential threat to human health or safety shall be reported as soon as possible but no later than twelve hours after the deviation is discovered.

Excess emissions shall be reported as soon as possible. In accordance with SWCAA 400-107(1), excess emissions that the permittee wishes to be considered unavoidable must be reported no later than 48 hours after discovery.

All deviation reports shall be submitted in writing (e.g. e-mail, facsimile or letter). Each report shall include the following information:

- (a) Identification of the emission unit(s) involved;
- (b) Duration of the event including the beginning and end times;
- (c) Description of the event, including:
  - (1) Whether or not the deviation was due to an upset condition, and
  - (2) Probable cause of the deviations;
- (d) Estimate of the quantity of excess emissions for exceedances of non-opacity emission limits;
- (e) Description of corrective action taken in response to the event (if any); and
- (f) Preventive measures taken or planned to minimize future recurrence.

**R2. Complaint Reports** **WAC 173-401-615(3)**

The permittee shall report all air pollution related complaints to SWCAA within 3 business days of receipt. Complaint reports shall include the following information:

- (a) Date and time of the complaint;
- (b) Name of the complainant;
- (c) Nature of the complaint; and
- (d) Description of action taken in response to complaint (if any).

**R3. Semi-Annual Reports** **WAC 173-401-615(3)**

Consistent with WAC 173-401-615(3) the permittee shall submit to SWCAA by September 15th and March 15th for the six-month periods January through June and July through December respectively, a report on the status of all monitoring requirements. All instances of deviation from permit requirements shall be clearly identified. The semi-annual report shall contain a certification of any reports submitted during the semi-annual period that have not already been certified. The certification shall be consistent with WAC 173-401-520.

**R4. Annual Reports** **WAC 173-401-615(3)**

The permittee shall submit an annual report to SWCAA by March 15<sup>th</sup> for the previous calendar year. Each annual report must be certified by a responsible official consistent with WAC 173-401-520, and shall contain, at a minimum, the following information:

- (a) Records of all required monitoring and inspections as described in monitoring requirements M1 thru M3 of this Permit;
- (b) Results of all EPA Method 9 or SWCAA Method 9 monitoring conducted during the reporting period. A copy of the relevant opacity certification(s) shall be submitted with the report;
- (c) Quantity and species of lumber dried in the dry kilns (MMbf);
- (d) Quantity of anti-sapstain chemicals used in the anti-sapstain systems;
- (e) Quantity of lumber processed in the Planer #18 and Planer #19 anti-sapstain systems;
- (f) Number of hours of operation for the Planer #18 shavings system baghouse;
- (g) Number of hours of operation for the Planer #19 dust collection system baghouse;
- (h) Number of hours of operation for the Trimmer Saw dust collection system baghouse;
- (i) Number of hours of operation for Fire Pump #1;
- (j) Number of hours of operation for Fire Pump #2; and
- (k) Summary of annual facilitywide air pollutant emissions.

**Sawmill****WAC 173-720-(4)(b)(D)****R5. Significant Emissions Increase Reports****Order 4372 Amendment 1**

As required by WAC 173-400-720(4)(b)(iii)(D)(iv), the permittee shall submit an annual report summarizing emissions information within 60 days after the end of the calendar year following resumption of regular operation after the improvements have been completed. This report shall be submitted for calendar years 2009-2018.

**R6. Emission Inventory Reports****SWCAA 400-105**

The permittee shall submit an inventory of air emissions for each calendar year to SWCAA by March 15<sup>th</sup> of the following year in accordance with SWCAA 400-105, unless an alternate date is approved by SWCAA. The inventory shall include stack and fugitive emissions of NO<sub>x</sub>, SO<sub>2</sub>, CO, VOC, PM, PM<sub>10</sub>, PM<sub>2.5</sub>, hazardous air pollutants, and toxic air pollutants as defined in WAC 173-460 (effective 8/21/98). TAP emissions shall be calculated consistent with the emission factors and methodology presented in applicable orders.

**R7. Annual Compliance Certification****WAC 173-401-530(2)(d)****WAC 173-401-630(5)**

The permittee shall submit to SWCAA and EPA a certification of compliance with all terms and conditions of this permit in accordance with WAC 173-401-630(5)(d). The permittee is not required to certify compliance for insignificant emission units or activities.

The permittee shall submit the following information by March 15<sup>th</sup> for the previous calendar year:

- (a) Identification of each term or condition of the permit that is the basis of the certification;
- (b) Statement of compliance status;
- (c) Whether compliance was continuous or intermittent;
- (d) Method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with WAC 173-401-615;
- (e) Such other facts as SWCAA may require to determine the compliance status of the source; and
- (f) Such additional requirements as may be specified pursuant to Sections 114(a)(3) and 504(b) of the FCAA.

**R8. Emission Test Reports****SWCAA 400-106**

The permittee shall do the following for each emission test conducted pursuant to this permit:

- (a) Submit a comprehensive test plan to SWCAA for review and approval at least ten business days prior to emission testing;
- (b) Notify SWCAA at least three business days in advance of emission testing so that SWCAA personnel may be present during testing;
- (c) Report required test results to SWCAA within forty-five days of test completion. Emissions data shall be corrected to units that correspond to the applicable standard.

**X. NON-APPLICABLE TERMS AND CONDITIONS**

The following lists all federal, state, and/or local requirements that might reasonably apply to the permittee, but are deemed nonapplicable after review by SWCAA. In accordance with WAC 173-401-640, the permittee is provided a permit shield for not complying with the requirements listed below where they have been identified to be non-applicable to specific emission units.

**N1. Mandatory Greenhouse Gas Reporting (Federal) 40 CFR 98**

40 CFR 98 establishes mandatory reporting requirements for greenhouse gas (GHG) emissions from selected stationary source categories in the United States. Pursuant to 40 CFR 98.3, facilities subject to this regulation must submit GHG emissions reports to the Administrator, as specified in paragraphs (a) through (g) of that section, for calendar year 2010 and each subsequent calendar year. This regulation was proposed on April 10, 2009 (74FR16609) and finalized on September 22, 2009. In the preamble of the final promulgation, EPA responded to a question regarding whether the reporting requirements constitute an applicable requirement for the purposes of Title V. The response indicates that they are not.

*As currently written, the definition of "applicable requirement" in 40 CFR 70.2 and 71.2 does not include a monitoring rule such as today's action, which is promulgated under CAA sections 114(a)(1) and 208. <http://www.epa.gov/climatechange/emissions/ghgrulemaking.html>*

**N2. Reporting of Emission of Greenhouse Gases WAC 173-441**

WAC 173-441 requires owners and operators to quantify and report emissions of greenhouse gases from applicable source categories if actual emissions from their facility are ten thousand metric tons CO<sub>2</sub>e or more per year. Annual greenhouse gas emissions from this facility are less than applicable reporting thresholds so the facility is not currently subject to the reporting program.

**Standards of Performance for****40 CFR 60, Subpart IIII****N3. Stationary Compression Ignition Internal Combustion Engines SWCAA 400-115**

Subpart IIII establishes performance standards for applicable to operators of stationary compression ignition (CI) internal combustion engines (ICE) that are manufactured after April 1, 2006 (except a fire pump engine), manufactured as a certified National Fire Protection Association (NFPA) fire pump engine after July 1, 2006, or modified/reconstructed after July 11, 2005. The fire pumps at this facility were manufactured prior to April 1, 2006. The units have not been modified or reconstructed. Therefore, this regulation is not applicable.

**General Standards for Maximum Emissions****N4. Fugitive Emissions SWCAA 400-040(3)(b)**

This regulation requires material handling, construction, demolition or any other operation that emits fugitive emissions and has been identified as a significant contributor to a nonattainment area to use reasonable and available control methods to control emissions of air contaminants for which the area is designated nonattainment. This facility does not have any operations identified as a significant contributor to a nonattainment area, so this requirement is not applicable.

**General Standards for Maximum Emissions****N5. Fugitive Dust Sources SWCAA 400-040(8)(b)**

This regulation requires existing stationary sources of fugitive dust that has been identified as a significant contributor to a PM<sub>10</sub> or PM<sub>2.5</sub> nonattainment area to use Reasonably Available Control Technology (RACT) to control emissions. This facility does not have any operations identified as a significant contributor to a nonattainment area, so this requirement is not applicable.

**N6. Emission Standards for Combustion and Incineration Units SWCAA 400-050(3)**

SWCAA 400-050(3) prohibits emissions of carbonyls from any incinerator in excess of 100 ppm total carbonyls as measured by applicable sampling methods and restricts operating hours. Pursuant to SWCAA 400-030(58), an incinerator is defined as "...a furnace used primarily for the thermal

destruction of waste." This facility has no combustion or incineration units. Therefore, this requirement is not applicable.

**N7. Requirements for Continuous Emission Monitoring Systems SWCAA 400-105(7)**

Pursuant to SWCAA 400-105(7), SWCAA may require any continuous emission monitoring (CEM) system installed to comply with an air discharge permit, PSD permit, or agency regulation, and not subject to CEM requirements of 40 CFR 60, 61, 62, 63 or 75 to meet minimum requirements. This facility is not required to have a CEM system. Therefore, this requirement is not applicable.

**N8. Source Registration Program SWCAA 400-100**

SWCAA 400-100 implements SWCAA's source registration program. Pursuant to SWCAA 400-100(1)(b) sources subject to the Air Operating Permit program (WAC 173-401) are exempt from the registration program. Therefore, the registration program is not applicable to this facility.

**N9. Requirements for Sources in a Maintenance Plan Area SWCAA 400-111**

The permittee is not located in a maintenance plan area for any criteria pollutant; therefore, this regulation is not applicable.

**N10. Requirements for New Sources in Nonattainment Areas SWCAA 400-112**

The permittee is not located in a nonattainment area for any criteria pollutant; therefore, this regulation is not applicable.

**N11. Bubble Rules SWCAA 400-120**

The permittee has not requested an emission bubble for any regulated pollutant. Therefore, this regulation is not applicable.

**Emission Standards and Controls for**

**N12. Sources Emitting Volatile Organic Compounds SWCAA 490**

This regulation establishes technically feasible and reasonably attainable emission standards for volatile organic compound (VOC) emissions from sources located in, or operating within, designated ozone nonattainment areas and areas covered by a maintenance plan within the jurisdiction of SWCAA. This facility is not located in a designated ozone nonattainment area or a maintenance plan area, so this regulation is not applicable.

**N13. Compliance Assurance Monitoring 40 CFR 64**

40 CFR 64 establishes criteria that define what monitoring should be conducted by a source owner or operator to provide a reasonable assurance there is compliance with emission limits and standards in order to certify compliance under the Title V operating permit program. The Planer Mill material transfer cyclones are considered to be inherent process equipment rather than control devices under the CAM rule definition. Uncontrolled potential PM<sub>10</sub> emissions from each of the baghouses is estimated to be less than the major source threshold of 100 tpy. Therefore, none of the units listed below are subject to the CAM rule.

- Planer Line #18 Material Transfer Cyclones
- Planer Line #19 Material Transfer Cyclones
- Planer #18 Shavings System Baghouse
- Planer #19 Dust Collection System Baghouse
- Trimmer Saw Dust Collection System Baghouse