

June 18, 2019

Nancy Wood-Siglin, Environmental Manager
Weyerhaeuser Longview Lumber
2901 Industrial Way
Longview, WA 98632

Re: Final Air Operating Permit for Weyerhaeuser Longview Lumber

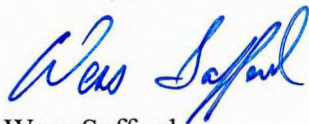
Dear Ms. Wood-Siglin:

The Southwest Clean Air Agency (SWCAA) is issuing final Air Operating Permit SW18-23-R0 for Weyerhaeuser Longview Lumber. This is a renewal permit.

A copy of the final Air Operating Permit and associated Basis Statement are enclosed with this letter. Electronic copies of each document will also be available on SWCAA's website at www.swcleanair.org.

If you have any questions or comments, please contact me at (360) 574-3058 ext. 126.

Sincerely,



Wess Safford
Air Quality Engineer

Enclosures



Weyerhaeuser NR Company
Weyerhaeuser Longview Lumber
Title V Basis Statement

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

PERMIT #: SW18-23-R0

ISSUED: June 18, 2019 (FINAL)

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

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

PERMIT ENGINEER: Wess Safford, Air Quality Engineer

REVIEWED BY: Paul T. Mairose, Chief Engineer

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I. GENERAL INFORMATION AND CERTIFICATION

1. **Company Name:** Weyerhaeuser NR Company
2. **Facility Name:** Weyerhaeuser Longview Lumber
3. **Responsible Official:** Steve Harms, Plant Manager
4. **Facility Contact Person:** Nancy Wood-Siglin, EHS Manager
5. **Unified Business Identification Number:** 602865829
6. **SIC / NAICS Code:** 2421 / 321113
7. **Basis for Title V Applicability:** The facility is subject to the Title V Air Operating Permit program because potential emissions from the lumber dry kilns are greater than 10 tpy of a single HAP (Methanol - 16.8 tpy) and greater than 100 tpy of a regulated pollutant (VOC - 138 tpy).
8. **Purpose of Current Permitting Action:** The purpose of the current permitting action is to issue a renewal AOP. Concurrent with issuance of a renewal AOP, jurisdiction over the facility will pass from the Department of Ecology (Ecology) to the Southwest Clean Air Agency (SWCAA).
9. **Attainment Area:** Weyerhaeuser Longview Lumber (Longview Lumber) is located in an area which is in attainment for all criteria pollutants.
10. **Facility Description:** Longview Lumber is located in Longview, Washington. Longview Lumber is part of a larger 700+ acre site that includes a kraft pulp and paper mill, wastewater treatment plant, and a thermomechanical pulp and paper mill. These separate sources have historically been considered as a single major source for Title V permitting due to common ownership and control. Weyerhaeuser recently sold its interest in the kraft and thermomechanical mills, so Longview Lumber is no longer under the same ownership or control as other facilities at the site. The Department of Ecology has issued a disaggregation memo to document the status of Longview Lumber as a separate stationary source for the purposes of the AOP Program.

Longview Lumber produces dimensional lumber (green and kiln-dried) from raw timber. Lumber operations at the facility include log receiving and storage; lumber receiving and storage, shipping facilities; lumber dry kilns; lumber planer lines, anti-sapstain spray treatment systems, wood residual storage and shipping, and maintenance support activities. The facility has the ability to process lumber from offsite sawmills, but does not currently do so.

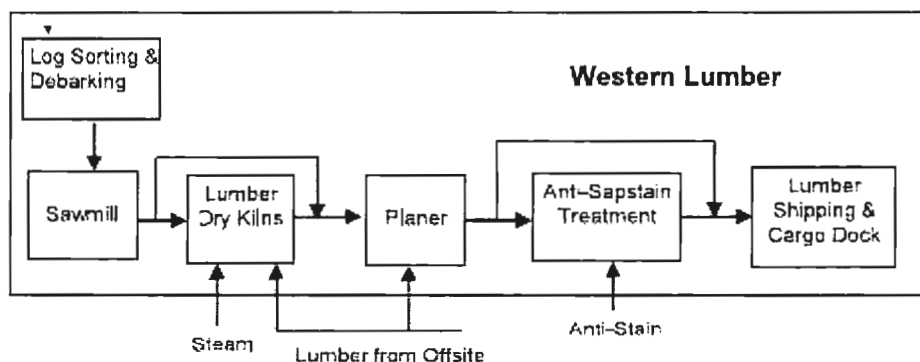
Receiving and Shipping. Longview Lumber receives timber by truck from offsite sources. Logs are scaled, unloaded and stored in the log yard. The facility may also receive lumber from offsite mills for processing, product storage and/or shipping at the Longview facility. Offsite lumber is received by truck or rail. Finished lumber products are shipped by truck, rail, and barge. Cargo dock operations include product storage and barge loading.

Sawmill. Longview Lumber operates a sawmill at the facility. Logs for the sawmill are received by trucked and stored onsite until needed. Logs are debarked and then processed into dimensional lumber. The maximum production capacity of the sawmill is ~500 MMbf/yr. Lumber produced by the sawmill is sent to the onsite planer mill. The sawmill was rebuilt and expanded in 2008.

Planer Mill. Longview Lumber currently operates two planer lines at the facility. These lines are referred to as Line 18 and Line 19. Line 18 commenced operation in 1972. Line 19 commenced operation in 2003. Longview Lumber previously operated another planer line referred to as Line 17. Line 17 was taken out of service shortly after Line 19 commenced operation. The annual production capacity of each planer line is ~300 MMbf for Line 18 and ~400 MMbf for Line 19. The planer lines do not routinely operate at full capacity, so maximum production capacities are based on facility estimates. Finished lumber may be shipped green or dried in onsite lumber drying kilns.

Planer mill operations include high-speed dimensional planers, anti-sapstain solution spray application booths, ink-jet grade stamping units and wood residual collection systems (chips, shavings, dust). Lumber trim ends are chipped and transferred to elevated storage bins. Stored chips are gravity loaded into trucks and shipped offsite, typically for use in making pulp. Planer shavings and dust are collected from planers, trimmer saws and package saws in the mill, and transferred to elevated storage bins using pneumatic systems equipped with cyclones. Stored material is gravity loaded into trucks and shipped offsite, typically for use as boiler fuel. Each planer line has a dedicated transfer system. Exhaust from each transfer cyclone is vented to a dedicated high-efficiency baghouse, which controls particulate emissions from the system.

Lumber Dry Kilns. Longview Lumber operates ten dry kilns at the facility. Process steam for the dry kilns is generated by boilers in the adjacent kraft mill power & recovery process area (owned by Nippon Paper Industries). Each dry kiln has an estimated annual drying capacity of ~15 million board feet (MMbf) for green hemlock furnish and ~30 MMbf for Douglas fir. The mix of species dried at the facility varies with market conditions. The dry kilns are considered a single emission unit, with each dry kiln constituting a separate emission point. There are no active emission control devices in use on the dry kilns.



Longview Lumber – Process Flow Diagram

11. Facility Permitting History:

The following table lists each approval order issued to the facility by SWCAA and Ecology. Orders listed in *italics bold* contain no active requirements. The requirements may have been superseded, may have been of limited duration, or the equipment may have been removed.

<u>Order Number</u>	<u>Issue Date</u>	<u>Permitting Action Description</u>
<i><u>Current</u></i>		
Ecology 12950	12/18/2015	This permitting action approved replacement of the existing Planer #18 shavings system with a new reconfigured system. New equipment (ductwork, cyclone, and baghouse) was installed, but the project did not increase potential emissions and did not increase planer capacity. The action was subject to WAC 173-400-114 and did not include New Source Review.
Ecology 10371	3/14/2014	This permitting action approved an increase in VOC emissions from the Planer #19 anti-sapstain spray system.
Ecology 4372 Amendment 1	6/28/2010	This permitting action approved modification of the existing sawmill dust collection system to improve collection efficiency and reduce dust deposition within the sawmill building.
Ecology 97AQ-I087 Amendment 1	9/15/2008	This permitting action revised emission factors and potential emission estimates for lumber drying to reflect new emissions information. The revised emission factors increased the facility's estimated potential emissions above applicable major source thresholds in WAC 173-401. Consequently, the facility was reclassified as a major source for the purposes of the Air Operating Permit program.
Ecology 95AQ-I079	2/8/1996	This permitting action approved modification of existing Planer Mill anti-sapstain spray systems. The modifications increased production capacity and potential emissions.
<i><u>Obsolete/Superseded</u></i>		
Ecology 4372	3/27/2008	<i>This permitting action approved installation of a new sawmill. The new sawmill included a saw filing and maintenance shop, a trimmer saw and collection systems for residual chips and shavings. No changes were made to existing planer lines and dry kilns.</i>
		<i>This order has been superseded by order 4372 Amendment 1.</i>

<u>Order Number</u>	<u>Issue Date</u>	<u>Permitting Action Description</u>
<i>Ecology 03AQIS-5416</i>	<i>3/19/2003</i>	<p><i>This permitting action approved installation of a new planer line (Planer #19) in the Planer Mill. The new planer line included a high-speed dimension planer, central dust collection system, anti-sapstain spray booth, and collection systems for residual chips and shavings. Planer mill capacity increased as a result of this project. Lumber drying capacity remained unchanged.</i></p> <p><i>This order was rescinded by order 10371.</i></p>
<i>Ecology 97AQ-I087</i>	<i>12/1/1997</i>	<p><i>This permitting action approved installation of two new lumber dry kilns. Drying capacity of the facility increased as a result of the project.</i></p> <p><i>This order has been superseded by order 97AQ-I087 Amendment 1.</i></p>
<i>Ecology 96AQ-I082</i>	<i>11/26/1996</i>	<p><i>This permitting action approved installation of two new lumber dry kilns. Ten existing dry kilns were removed as part of the project. Drying capacity of the facility remained unchanged.</i></p> <p><i>This order was revoked by order 97AQ-I087.</i></p>
<i>SWCAA 94-1684</i>	<i>11/30/1994</i>	<p><i>This permitting action approved installation of six new lumber dry kilns. The proposed dry kilns were to dry exclusively hem-fir and Douglas fir lumber. Forty existing dry kilns were removed as part of the project.</i></p> <p><i>This order was revoked by order 96AQ-I082.</i></p>
<i>SWCAA 93-1498</i>	<i>8/5/1993</i>	<p><i>This permitting action approved the installation of a sapstain spray system on each of the facility's planer lines.</i></p> <p><i>This order was revoked by order 95AQ-I079.</i></p>

II. EMISSION UNIT IDENTIFICATION

ID	Generating Equipment/Activity	Emission Control
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

EU1 Lumber Dry Kilns.

Longview Lumber operates ten steam heated dry kilns at the facility. Process steam for the dry kilns is generated by boilers in the adjacent kraft mill power & recovery process area (owned by Nippon Paper Industries). Longview Lumber is approved to dry hemlock and Douglas fir lumber. The actual mix of species dried at the facility varies with market conditions. The dry kilns are considered a single emission unit, with each dry kiln constituting a separate emission point. The maximum temperature of drying cycles in the dry kilns is limited, but there are no active emission control devices in use.

This emission unit was traditionally considered a “natural minor source” of air emissions not subject to the AOP program. However, updated dry kiln emissions research conducted by Oregon State University indicated that VOC and HAP emissions from lumber drying were greater than previously thought. Ecology amended Order No. DE 97 AQ-I087 in September 2008 to reflect the updated emission factors for lumber drying. Based on the new emissions factors, lumber drying operations at the were determined to be a major source with a potential to emit 16.8 tons per year of methanol. The facility operates a total of 10 single track dry kilns with a combined capacity of ~240,000,000 MMbf/yr.

This emission unit is not subject to any requirements from 40 CFR 60 or 61. This emission unit is subject to 40 CFR 63 Subpart DDDD, but there are no emission standards or operating requirements applicable to lumber dry kilns. Therefore, there are no applicable MACT requirements beyond submittal of the initial notification of applicability, which was submitted on January 26, 2005.

EU2 Planer Mill - Material Collection Systems

Longview Lumber currently operates two planer lines at the facility (Planer #18, Planer #19). Each planer is configured with a central system that collects planer shavings and dust from associated planers, trimmer saws and package saws and transfers the material to elevated storage bins using pneumatic systems equipped with cyclones. Exhaust from each transfer cyclone is vented to a dedicated baghouse. Particulate matter emissions are controlled using process enclosure and high efficiency filtration.

The Planer #18 shavings system baghouse is described as follows:

Make/Model:	Western Pneumatics model 630
Flowrate:	50,000 acfm
Filtration Area:	8,247 ft ²
Filter Cleaning:	Reverse air

The Planer #19 dust collection system baghouse is described as follows:

Make/Model:	Western Pneumatics model 512
Flowrate:	49,000 acfm
Filtration Area:	8,042 ft ²
Filter Cleaning:	Reverse air

This emission unit is not subject to any requirements from 40 CFR 60, 61 or 63.

EU3 Planer Mill – Anti-Sapstain Spray Systems

Longview Lumber currently operates two planer lines at the facility (Planer #18, Planer #19). In each planer line, green lumber is sprayed with anti-sapstain chemicals to inhibit the growth of mold and other fungi.

Each planer line operates the following anti-sapstain spray system:

Chapcoater 85-2 lumber spray system manufactured by Lacey-Harmer Company. The spray system is composed of three major components: a pump station, a spray chamber, and an overspray recycling system.

- 1) The pump station consists of a two-head adjustable proportioning pump to control the ratio of dilution of water and concentrate into a 30-gallon work tank. The treatment chemical is then drawn from the work tank by a positive displacement feed pump through a motorized filter for delivery to the spray chamber. A special vibrating filter designed to remove sawdust and other solids from the overspray solution captured within the spray chamber or recycling system is included prior to recycling the solution back to the work tank.
- 2) The spray chamber is a stainless steel, fully gasketed unit with high pressure airless nozzles which deliver a mist of fine droplets for maximum coverage of the lumber. Flexible isolation curtains on the infeed and outfeed opening contain the mist inside the spray chamber.
- 3) The recycling system comprises an exhaust blower, condensation chamber, exhaust and return manifolds and a vibrating filter to remove solids from the recycled solution. Overspray which condenses in the spray chamber drains to a bottom collection tray for recycling. The spray chamber is evacuated with an exhaust system to draw off any aerosol overspray, which is then condensed and recirculated back to the spray chamber. Overspray solution from either the spray chamber or the condensation chamber is returned via ducting to the vibrating filter for removal of solids for reuse in the work tank.

This emission unit is not subject to any requirements from 40 CFR 60, 61 or 63.

EU4 Trimmer Saw Dust Collection System

The sawmill at this facility operates multiple saw systems (quad bandsaw, compact roundsaw, trimmer saw) to convert timber into dimensional lumber. The saw systems are located inside an enclosed building (sawmill building). Quad bandsaw and compact roundsaw operations are vented to a dust collection system equipped with a cyclone. Trimmer saw operations are vented to a separate dust collection system equipped with a baghouse. While most of the airflow from the bandsaw/roundsaw cyclone system is vented back into the sawmill building, a portion of the flow is vented as a secondary stream to the trimmer saw baghouse. The trimmer saw baghouse vents to ambient atmosphere at ~19,600 acfm.

This emission unit is not subject to any requirements from 40 CFR 60, 61 or 63.

EU5 Sawmill – Residual Bins

Lumber manufacturing operations at the sawmill generate residual material streams (chip, sawdust, bark, shavings). The residual material is collected by various mechanical systems and transferred to elevated storage bins. Stored material is gravity loaded into truck trailers and shipped offsite. Emissions from material handling are minimized through the use of wind shrouds and process enclosure. The facility operates three residual storage bins.

Each bin is described as follows:

Make/Model:	Western Pneumatic model 42
Capacity:	42 units

This emission unit is not subject to any requirements from 40 CFR 60, 61 or 63.

EU6 Emergency Fire Pumps

Longview Lumber operates two emergency fire pumps at the facility. These pumps provide water to onsite fire suppression systems in event of a loss of utility power. The pumps are powered by dedicated diesel fired engines. One of the units is not currently in active use.

The diesel engine for fire pump #1 is described as follows:

Make/Model:	Cummins model 6CTA
Power Rating:	300 hp
Fuel Type:	Diesel
Installed:	2004

The diesel engine for fire pump #2 is described as follows:

Make/Model:	Cummins model NT855
Power Rating:	335 hp
Fuel Type:	Diesel

This emission unit is subject to applicable requirements found in 40 CFR 63 Subpart ZZZZ. The emergency fire pumps are classified as existing emergency stationary RICE (≤ 500 hp at a major HAP source).

Compliance Assurance Monitoring (CAM) Determination

The CAM rule (40 CFR 64) requires facilities to monitor compliance indicators for emission units to provide reasonable assurance for compliance with regulatory emission limitations. When monitoring indicates the occurrence of a parameter excursion or exceedance, the facility is required to take corrective action to restore the monitoring parameter to the value range established as part of a source compliance or performance test. The facility is also required to document/report corrective actions, maintain monitoring records, and provide an annual certification of compliance to the delegated authority that administers the Title V operating permit program.

In accordance with 40 CFR 64.2, the CAM rule applies to Pollutant Specific Emission Units (PSEU) at major sources that are required to obtain a Part 70 or 71 permit and meet all of the following criteria:

- 1) The PSEU is subject to an emission limitation or standard for the applicable regulated air pollutant (or surrogate);
- 2) The PSEU uses a control device to achieve compliance with the emission limit or standard; and
- 3) The PSEU has potential pre-control device emissions (of the applicable regulated pollutant) equal to or above the major source threshold.

In accordance with 40 CFR 64.2(b), the following are *exempt* from the CAM rule:

- 1) Emission limitation or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 and 112 of the Clean Air Act; and
- 2) Emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method

Longview Lumber has determined that CAM is not applicable to any of the emission units at the facility. The table below summarizes findings in support of the determination of non-applicability.

PSEU	Pollutant	CAM Applicable	Applicability Determination
Lumber Drying Kilns	Opacity	No	Emission control device not used to achieve compliance with pollutant emission limit/standard.
Lumber Drying Kilns	VOC	No	Emission control device not used to achieve compliance with pollutant emission limit/standard.
Planer #18 (Baghouse)	PM	No	Pre-control emission of applicable pollutant below major source threshold (PM - 51.0 tpy).
Planer #18 (Demister)	VOC	No	Emission control device not used to achieve compliance with pollutant emission limit/standard. Demisters are considered "process equipment" and not "control device."
Planer #18 (Demister)	HAPs	No	Emission control device not used to achieve compliance with pollutant emission limit/standard. Demisters are considered "process equipment" and not "control device."
Planer #19 (Baghouse)	PM	No	Pre-control emission of applicable pollutant below major source threshold (PM - 92.8 tpy).
Planer #19 (Demister)	VOC	No	Emission control device not used to achieve compliance with pollutant emission limit/standard. Demisters are considered "process equipment" and not "control device."
Sawmill (Baghouse)	PM	No	Pre-control emission of applicable pollutant below major source threshold (PM - 20 tpy).

III. INSIGNIFICANT EMISSION UNIT IDENTIFICATION

In accordance with WAC 173-401-530, an emission unit or activity is considered insignificant if:

- The emission unit or activity generates only fugitive emissions and is not subject to applicable requirements other than generally applicable requirements of the state implementation plan. [WAC 173-401-530(1)(d)]
- Actual emissions of all regulated air pollutants from an emission unit or activity are less than the emission thresholds established in WAC 173-401-530(4).
- The emission unit or activity is listed as categorically exempt in WAC 173-401-532.
- The emission unit or activity is listed in WAC 173-401-533 and its size or production rate based on maximum rated capacity is below the specified level.

Identified insignificant emission units (IEU) at this facility are listed in the table below.

IEU Name/Description	IEU Basis
Receiving and shipping activities.	173-401-530(1)(d)
NPDES permitted ponds and lagoons utilized solely for the purpose of settling suspended solids and skimming of oil and grease.	173-401-533(3)(d)

IV. EXPLANATION OF SELECTED PERMIT PROVISIONS AND GENERAL TERMS AND CONDITIONS

P13. Excess Emissions

SWCAA 400-107

SWCAA 400-107 establishes criteria and procedures for determining when excess emissions are considered unavoidable. Emissions that meet the requirements to be classified as unavoidable are still considered excess emissions and are reportable but are excused and not subject to penalty. Notification of excess emissions is required as soon as possible and shall occur by the next business day following the excess emissions event. Excess emissions due to startup or shutdown conditions are considered unavoidable if the permittee adequately demonstrates the excess emissions could not have been prevented through careful planning and design. Upset excess emissions are considered unavoidable if the permittee adequately demonstrates the upset event was not caused by poor or inadequate design, operation, maintenance, or other reasonably preventable condition, and the permittee takes appropriate corrective action that minimizes emissions during the event, taking into account the total emissions impact of that corrective action.

G5. Permit Renewal

WAC 173-401-710(1)

An Air Operating Permit has an effective term of 5 years from the date of final issuance. Pursuant to WAC 173-401-710(1), the Permit specifies a date by which a renewal application is required to be submitted to SWCAA.

A preliminary renewal application for this facility must be submitted no later than 12 months prior to permit expiration. A complete renewal application must be received no later than 6 months prior to permit expiration. Early submittal of a preliminary application is intended to provide SWCAA with the opportunity to review the application for completeness and allow the permittee sufficient time to amend the application, if necessary, prior to the final submission date.

WAC 173-400-117, WAC 173-400-700
WAC 173-460
SWCAA 400-109, SWCAA 400-110
SWCAA 400-820

G8. New Source Review

Construction or modification of an air pollution source is subject to review to ensure that applicable emission standards are met and appropriate control technology is employed. The program under which a new source or modification is reviewed depends on the type and quantity of potential air emissions associated with the project. New sources or modifications meeting the definition of a 'major stationary source' and located in attainment or unclassified areas are subject to review under the Prevention of Significant Deterioration (PSD) program administered by the Department of Ecology. New sources or modifications meeting the definition of a 'major stationary source' and located in a nonattainment area and minor (area) sources are subject to review under SWCAA's new source review program. New sources or modification of existing sources that increase the emission of toxic air pollutants are subject to review under SWCAA's toxic air pollutant program, which implements the February 14, 1994 version of WAC 173-460.

G9. Portable Sources

SWCAA 400-110(6)

SWCAA 400-110(6) establishes procedures for approving the operation of portable sources of air emissions that locate temporarily at project sites. These requirements are general standards and apply to all portable sources of air contaminants. Equipment commonly subject to these conditions include emergency generators, engine-powered pumps, rock crushers, concrete batch plants, and hot mix asphalt plants that operate for a short time period at a site to fulfill the needs of a specific contract. Portable sources exempt from registration under SWCAA 400-101 are also exempt from SWCAA 400-110 and not subject to the portable source requirements.

G16. Chemical Accident Prevention Provisions

40 CFR 68

40 CFR 68 requires facilities which have greater than a threshold quantity of a regulated toxic substance in a process to develop and implement a risk management program (see 40 CFR 68.130 for tabulated threshold quantities). The risk management programs are to include a hazard assessment of the off-site consequences of releases under worst case and alternate scenarios, a prevention program, and an emergency response program. The risk management programs are documents in a Risk Management Plan which is reviewed, updated, and submitted to EPA every five years and stored in a central location.

Based on quantities of regulated toxics substances, the former Weyerhaeuser complex was subject to the Chemical Accident Prevention Provisions of 40 CFR 68. However, Weyerhaeuser Longview Lumber has less than threshold quantities of any regulated toxic substance in process, therefore 40 CFR Part 68 is not applicable.

V. EXPLANATION OF OPERATING TERMS AND CONDITIONS

Reqs 1-7

General Standards for Maximum Emissions

SWCAA 400-040

Reqs 1-7 incorporate general maximum emission standards for various air contaminants established in SWCAA 400-040. These standards apply to all emission units at the source, both EU and IEU. Pursuant to WAC 401-530(2)(c), the permit does not contain any testing, monitoring, recordkeeping, or reporting requirements for affected IEUs except those specifically identified by the underlying requirements. General

monitoring provisions have been created for EUs under 'gap-filling' to provide reasonable compliance assurance.

Req 6 prohibits any concealment or masking. At present, the permittee does not operate any equipment capable of masking emissions, therefore monitoring is limited to the annual compliance certification.

Req 8

Emission Standards for General Process Units

SWCAA 400-060

Req 8 incorporates a particulate matter emission limit for general process units that applies to all general process units at the source, both EUs and IEUs. Pursuant to WAC 401-530(2)(c), the permit does not contain any testing, monitoring, recordkeeping, or reporting requirements for affected IEUs except those specifically identified by the underlying requirements. General monitoring provisions have been created for EUs under 'gap-filling' to provide reasonable compliance assurance.

Req 9

Adjustment for Atmospheric Conditions

SWCAA 400-205

Req 9 incorporates a general prohibition against varying the rate of emissions in response to atmospheric conditions. This requirement is applicable to both EUs and IEUs. Pursuant to WAC 401-530(2)(c), the permit does not contain any testing, monitoring, recordkeeping, or reporting requirements for affected IEUs except those specifically identified by the underlying requirements. Compliance with this requirement is assured via compliance certification by the responsible official.

Reqs 10-14

Lumber Dry Kilns

Order 97AQ-I087 Amendment 1

Reqs 10-14 incorporate New Source Review BACT requirements for the lumber dry kilns.

Req 10 requires the permittee to maintain and operate the lumber dry kilns in a manner consistent with good air pollution control practices for minimizing emissions. Compliance with this requirement is assured via compliance certification by the responsible official.

Req 11 limits visible emissions from the lumber dry kilns. Order 97AQ-I087 Amendment 1 does not specify monitoring to demonstrate compliance so monitoring requirements have been added pursuant to WAC 173-401-615(1)(b). Compliance is assured through periodic visual surveys.

Req 12 limits total air emissions from the lumber dry kilns. Compliance is demonstrated based on recorded lumber production and specified emission factors.

Reqs 13-14 limit the process temperature of the dry kilns and the species of lumber that can be dried. These restrictions are consistent with the operating scheme proposed in the permit application for the dry kilns. Compliance is demonstrated based on production records.

Reqs 15-16

Order 12950

Planer Mill - Material Collection Systems

Order 10371

Reqs 15-16 incorporate New Source Review BACT requirements for the Planer #18 shavings system baghouse and the Planer #19 dust collection system baghouse. Initial compliance with applicable emission limits was demonstrated via emission testing. Ongoing compliance with applicable emission limits is assured through inspection and maintenance records and periodic visual surveys.

Req 17**Order 12950****Planer Mill - Operating and Maintenance Manuals****Order 10371**

Req 17 incorporates a general New Source Review requirement to develop and maintain operating and maintenance manuals for all emitting equipment. The intent of the requirement is to minimize emissions by optimizing operation. Compliance with this requirement is assured via recordkeeping and compliance certification by the responsible official.

Req 18**Planer #19 Dust Collection System Baghouse****Order 10371**

Req 18 incorporates an equipment design requirement for the Planer #19 dust collection system baghouse. The baghouse was required to be configured to allow for sampling in accordance with EPA Method 1. The baghouse was only subject to initial emission testing, but the requirement has been maintained to support future emission testing if necessary. Compliance with this requirement is assured via compliance certification by the responsible official.

Reqs 19-22**95AQ-I079****Planer Mill - Anti-Sapstain Spray Systems****Order 10371**

Reqs 19-22 incorporate New Source Review requirements for the Planer Mill anti-sapstain spray systems.

Reqs 19-20 limit VOC and TAP emissions from anti-sapstain spray operations. Compliance with the emission limits is demonstrated based on recorded usage of anti-sapstain chemicals and chemical component information. Compliance with this requirement is assured via compliance certification by the responsible official.

Reqs 21-22 require the permittee to operate specified emission control equipment during anti-sapstain spray operation and employ good practices and procedures to minimize odors associated with anti-sapstain application. Compliance with this requirement is assured through complaint monitoring.

Req 23**Sawmill - Trimmer Saw Dust Collection System****Order 4372 Amendment 1**

Req 23 incorporates a New Source Review BACT emission limit for PM emissions from the Trimmer Saw dust collection system baghouse. Initial compliance was demonstrated via emission testing using EPA Method 5 (*November 2008*). Ongoing compliance with applicable emission limits is assured through inspection and maintenance records and periodic visual surveys.

Reqs 24-25**Sawmill - Wood Residual Bins****Order 4372 Amendment 1**

Reqs 24-25 incorporate New Source Review BACT requirements to control fugitive emissions from operation of the wood residual bin loadout stations and associated truck traffic. Compliance is assured through maintenance and operating records.

Req 26**40 CFR 63.6625(f)****Emergency Fire Pumps - Hour Meter****SWCAA 400-075**

Req 26 incorporates a MACT (40 CFR 63, Subpart ZZZZ) requirement to equip each fire pump with a non-resettable hour meter. The purpose of the hour meter is to provide a reliable record of unit operation that can be used to demonstrate compliance with applicable operational limits. Compliance with this requirement is assured via compliance certification by the responsible official.

Reqs 27-28

40 CFR 63.6625(h), 40 CFR 63.6640(f)

Emergency Fire Pumps - Operating Limits**SWCAA 400-075**

Reqs 27-28 incorporate MACT (40 CFR 63, Subpart ZZZZ) operational limits applicable to the fire pumps. The operational limits restrict overall unit operation and minimize idle and startup periods. Compliance with these requirements is assured by hour meter readings and facility operating records.

Reqs 29-30

40 CFR 63.6603(a), 40 CFR 63.6605(b)

40 CFR 63.6625(e), 40 CFR 63.6640(a)

Emergency Fire Pumps - Operation and Maintenance**SWCAA 400-075**

Reqs 29-30 incorporate MACT (40 CFR 63, Subpart ZZZZ) requirements for operation and maintenance of the fire pumps. As provided for in 40 CFR 63.6625(e), the permittee has opted to implement a facility specific maintenance plan that provides for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. The maintenance plan includes annual inspection and/or replacement of critical engine components.

Req 30 contains unit specific requirements taken from Subpart ZZZZ, Table 2c. Compliance with these requirements is assured by facility operating and maintenance records.

VI. EXPLANATION OF OBSOLETE AND FUTURE REQUIREMENTS**OBSOLETE REQUIREMENTS:****MACT Notification and Record Keeping****40 CFR 63.2280**

The lumber dry kilns are subject to 40 CFR 63, Subpart DDDD and must provide initial notification of applicability. Notice was submitted on January 26, 2005.

Obsolete/Revoked Orders of Approval

The approval orders listed below are obsolete or have been revoked as described below.

Order 4372 issued March 27, 2008	Superseded by Order 4372, Amendment 1
Order 03AQIS-5416 issued March 19, 2003	Rescinded by Order 10371
Order 97AQ-I087 issued December 1, 1997	Superseded by Order 97AQ-I087 Amendment 1
Order 96AQ-I082 issued November 26, 1996	Revoked by Order 97AQ-I087
O/A 94-1684 issued November 30, 1994	Revoked by Order 96AQ-I082
O/A 93-1498 issued August 5, 1993	Revoked by Order 95AQ-I079

FUTURE REQUIREMENTS:

No future requirements identified.

VII. EXPLANATION OF MONITORING TERMS AND CONDITIONS

The monitoring terms listed below incorporate formal monitoring taken from applicable regulations as well as 'gap-fill' monitoring designed to assure compliance for requirements that do not contain formal monitoring. For applicable requirements that have one-time applicability or apply primarily to equipment design or installation, SWCAA relies upon compliance certification by the responsible official to provide compliance assurance.

General**M1. Visible Emissions Monitoring Reqs 1, 8, 11, 15, 16, 23**

This monitoring section is applicable to requirements drawn from SWCAA 400-040, SWCAA 400-060, Order 97AQ-I087, Order 4372 Amendment 1, Order 12950 and Order 10371. Reqs 1, 11 and 16 limit visible emissions, but do not directly establish any specific regime of monitoring or recordkeeping. Reqs 8, 15 and 23 limit particulate matter emission concentrations and require initial emission testing, but do not establish any ongoing compliance method. Therefore, SWCAA has implemented general monitoring requirements for all of these requirements under the "gap filling" provisions of WAC 173-401-615

The monitoring scheme specified by this requirement is designed to provide periodic assurance of compliance and identify potential visible emission violations in a timely fashion. A monthly inspection frequency is considered adequate to assure compliance with applicable opacity requirements.

General**M2. Fugitive Emissions/Particulate Matter Monitoring Reqs 2, 3, 7**

This monitoring section is applicable to general requirements drawn from SWCAA 400-040. These requirements do not establish a specific regime of monitoring or recordkeeping so SWCAA has implemented monitoring requirements under the "gap filling" provisions of WAC 173-401-615.

These requirements require the permittee to prevent particulate matter fallout and minimize fugitive emissions. This monitoring requirement is designed to assure compliance through periodic visual inspections of the facility and prompt corrective action. A lack of visual emissions or material accumulation is considered indicative of compliance with the applicable provisions and work practices.

General**M3. Complaint Monitoring Reqs 4, 5, 22**

This monitoring section is applicable to general requirements drawn from SWCAA 400-040 and operational limits from Order 95AQ-I079 and Order 10371. None of the requirements establish a specific regime of monitoring or recordkeeping. Consequently, SWCAA has implemented monitoring requirements under the "gap filling" provisions of WAC 173-401-615.

The general requirements from SWCAA 400-040 prohibit unacceptable impacts on neighboring properties and/or surrounding populations. The operational limits require the permittee to reduce process odors to a minimum. The prohibited impacts can potentially be observed from the facility itself, but compliance with all provisions can not be assured by onsite observations alone (e.g., offsite odor impact). Therefore, this monitoring scheme relies on input from affected parties. The monitoring is designed to assure compliance through prompt complaint response and corrective action.

Lumber Dry Kilns**M4. Emission Monitoring Reqs 12, 13, 14**

This monitoring section is drawn from Order 97AQ-I087 Amendment 1. The permittee is required to record the quantity and species of lumber dried in the kilns annually. Lumber Drying emissions are calculated based on recorded lumber production and specified emission factors.

Planer Mill – Material Collection Systems**M5. Emission Monitoring****Reqs 15, 16**

This monitoring section is drawn from Order 10371 and Order 12950. The permittee was required to perform an initial emission test of each material collection system baghouse. These tests were successfully performed in October 2016 (*Planer #18 Shavings System Baghouse*) and November 2003 (*Planer #19 Dust Collection System Baghouse*). No periodic emission testing is required by the underlying orders. The permittee is required to conduct periodic baghouse inspections and record upset conditions and maintenance activities.

The permittee is required to record hours of operation for each baghouse. Baghouse emissions are calculated based on recorded operation, baghouse discharge rate and the most recent emission test results.

Planer Mill – Anti-Sapstain Spray Systems**M6. Emission Monitoring****Reqs 19, 20**

This monitoring section is drawn from Order 95AQ-I079 and Order 10371. The permittee is required to record anti-sapstain chemical use and lumber production. Spray system emissions are calculated based on recorded chemical use and chemical content.

Sawmill – Trimmer Saw Dust Collection System**M7. Emission Monitoring****Req 23**

This monitoring section is drawn from Order 4372 Amendment 1. The permittee was required to perform an initial performance test for the trimmer saw dust collection system baghouse. The test was successfully performed in November 2008. No periodic emission testing is required by the underlying order. The permittee is required to record baghouse inspection results, upset conditions and maintenance activities.

The permittee is required to record hours of operation for the baghouse. Baghouse emissions are calculated based on recorded operation, baghouse discharge rate and the most recent emission test results.

Sawmill – Wood Residual Bins**M8. Operations Monitoring****Reqs 24, 25**

This monitoring section is drawn from Order 4372 Amendment 1. The permittee is required to record maintenance activities for the residual bins and wind shrouds and maintain a log of wet suppression use in gravel areas associated with the residual bin loadout stations. These measures confirm ongoing use of best practices to minimize fugitive emissions.

Sawmill**M9. Significant Emissions Increase Monitoring**

This monitoring section is drawn from Order 4372 Amendment 1 and WAC 173-401-724(5). The permittee completed a project (Sawmill installation) that increased emissions of a regulated pollutant, but did not constitute a significant emissions increase on the basis of a past actual to projected actual emissions test. Pursuant to WAC 173-400-720(4)(b)(iii)(D)(iv), the permittee must submit a report of annual emissions for a period of 10 years following resumption of regular operations after completion of the project. The purpose of this report is to confirm that actual emissions from the project did not constitute a significant emissions increase.

Emergency Fire Pumps**M10. Emission Monitoring****Reqs 26, 27, 28, 29, 30**

This monitoring section is drawn from 40 CFR 63, Subpart ZZZZ. Periodic testing is not required for this unit due to its status as emergency use only. Unit operation and maintenance must be documented in accordance with 40 CFR 63.6655 and 63.6660.

VIII. EXPLANATION OF RECORDKEEPING TERMS AND CONDITIONS**K1. General Recordkeeping**

The requirements cited in this recordkeeping section are drawn from provisions in WAC 173-401-615(2) and ADP 17-3230. Recordkeeping requirements have been separated into sub-categories for easier reference.

IX. EXPLANATION OF REPORTING TERMS AND CONDITIONS**R1. Deviations from Permit Conditions**

The permittee is required to promptly report all permit deviations pursuant to WAC 173-401-615(3) and SWCAA 400-107. Reporting timelines vary depending on the type of deviation involved.

The general timeline for deviation reporting (within 30 days following the end of the month of discovery) is cited in WAC 173-401-615(3). The timeline for reporting if the permittee wishes to claim excess emissions as unavoidable (within 48 hours of discovery) is defined in SWCAA 400-107. The timeline for deviations that pose a potential threat to human health and safety (within 12 hours of discovery) is taken directly from WAC 173-401-615(3).

In all cases, SWCAA may request a full written report of any deviation if determined to be necessary. Permit deviations are also to be identified in the subsequent quarterly report.

R2. Complaint Reports

The permittee is required to report all complaints to SWCAA within three business days of receipt. This reporting section is based on WAC 173-401-615(3), and SWCAA's definition of "prompt" for reporting of complaints. The intent is to ensure a timely and effective response to complaints by either the facility or SWCAA.

R3. Semi-Annual Reports

The permittee is required to submit semi-annual reports consistent with the requirements of WAC 173-401-615(3). The report must give the status of all monitoring requirements and clearly identify all instances of deviation from permit requirements during the preceding semi-annual period. A Responsible Official must certify all reports previously submitted during the preceding semi-annual period if they have not otherwise been certified.

R4. Annual Reports

The permittee is required to submit annual reports containing monitoring and inspection records, operational records, and facilitywide emission estimates. This information serves as the basis for compliance reviews and emission calculations. Each annual report must be certified by a Responsible Official consistent with WAC 173-401-520.

R5. Sawmill - Significant Emissions Increase Reports

The permittee is required to submit annual reports summarizing emissions from Sawmill operations for each calendar year following resumption of regular operation after the Sawmill project was completed. This report is reviewed to ensure a significant emissions increase did not occur. In accordance with WAC 173-400-720(4)(b)(iii)(D)(iv), this report shall be submitted for 10 years following resumption of regular operation. The Sawmill project commenced regular operation in 2008 so annual emission summary reports are required for calendar years 2009-2018.

R6. Emission Inventory Reports

The permittee is required to submit an emissions inventory report to SWCAA by March 15th for the previous calendar year. A complete emissions inventory includes quantification of emissions from all emission units at the facility. This reporting requirement is a combination of reporting requirements taken from SWCAA 400-105, Order 97AQ-I087 Amendment 1,

R7. Annual Compliance Certification

The permittee is required to report and certify compliance with all permit terms and conditions on an annual basis pursuant to SWCAA 401-630(5). Insignificant emission units are not included in this requirement.

R8. Emission Test Reports

This reporting requirement is a general requirement taken from SWCAA 400-106. The permittee is required to notify SWCAA in advance of all required emission testing and submit a comprehensive test plan prior to testing. Emission test results and contemporaneous operational data must be reported to SWCAA within 45 days of test completion.

The emission units at this facility are not currently subject to any periodic emission testing requirements.

X. COMPLIANCE HISTORY

Longview Lumber has not been cited for any violation of applicable requirements during the last five-year period.

XI. TITLE V PERMIT ACTIONS**1. Current Permitting Action**

Renewal Permit (SW18-23-R0)

Application received:	March 8, , 2018
Application complete:	April 27, 2018
Application sent to EPA:	April 27, 2018
Draft permit issued:	February 12, 2019
Proposed permit issued:	March 21, 2019
Final permit issued:	June 18, 2019

2. Previous Permitting Actions

Renewal (Ecology AOP 0000125)

Application received:	June 11, 2014
Draft permit issued:	May 25, 2017
Final permit issued:	October 6, 2017

XII. APPENDICES

None.

XIII. RESPONSE TO PUBLIC COMMENT

SWCAA issued a draft of AOP SW08-15-R1 on February 12, 2019. Notice of the draft permit was sent to EPA and affected states on February 12, 2019. No comment was received from EPA or any affected state.

A 30-day public comment period was provided for the draft permit. Notice of the comment period was published in the local newspaper of record on February 12, 2019 and in the Washington Permit Register on February 13, 2019. The public comment period closed on March 15, 2019. Public comment on the draft permit was received from the following parties:

Steve Harms, Weyerhaeuser Longview Mill Manager (letter – 3/11/2019)

COMMENTS / COMMENT RESPONSE:

- 1) *SWCAA has separated the Weyerhaeuser log sorting and export yard from the remainder of the Longview lumber operation. We agree with this approach, since the lumber operation is managed and operated independently of the log sorting and export operation.*

SWCAA Response: The log sorting and export yard was separated because it has a different two-digit SIC code and is not a support facility for the Longview lumber operation.

- 2) *The draft Basis Statement identifies a responsible official and facility contact person by name. The individuals named in the draft document are no longer located at the Longview facility. The current mill manager is Steve Harms. The current environmental manager is Nancy Wood-Siglin.*

SWCAA Response: Section 1 of the proposed Basis Statement has been updated with the correct names.