

September 7, 2023

Ms. Angela Cameron, Facility Environmental Manager
Weyerhaeuser NR Company
PO Box 931
Longview, WA 98632

Subject: Preliminary Air Discharge Permit for Voluntary Emission Limits

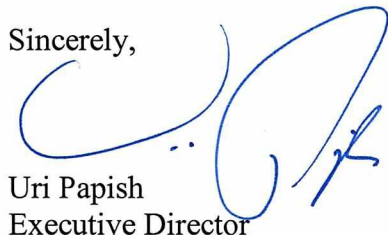
Dear Ms. Cameron:

A preliminary determination to issue Air Discharge Permit 23-3601 (ADP 23-3601) has been completed for ADP Application CO-1076 pursuant to Section 400-110(4) of the General Regulations for Air Pollution Sources of the Southwest Clean Air Agency (SWCAA). Public notice for ADP Application CO-1076 was published in the permit section of SWCAA's internet website on June 23, 2023. This permitting action requires a mandatory public comment period pursuant to SWCAA 400-171(2)(a). Therefore, a 30-day public comment period will be provided prior to a final determination.

Electronic copies of ADP 23-3601 and the associated Technical Support Document are available for public review in the permit section of SWCAA's internet website (<http://www.swcleanair.gov/permits/publiccomments.asp>). Original copies are enclosed for your files. If you have any comments on this preliminary determination please notify SWCAA within the specified comment period. If no comments are received, your final Air Discharge Permit will be issued at the conclusion of the comment period.

If you have any comments, or desire additional information, please contact me or Wess Safford at (360) 574-3058, extension 126.

Sincerely,



Uri Papish
Executive Director

UP:wls

Enclosure – Air Discharge Permit 23-3601 and Technical Support Document





AIR DISCHARGE PERMIT
23-3601
Preliminary Issued: September 7, 2023

Weyerhaeuser Longview Lumber
2901 Industrial Way, Longview, Washington 98632

SWCAA ID - 2514

REVIEWED BY: _____
Clinton Lamoreaux, Chief Engineer

APPROVED BY: _____
Uri Papish, Executive Director

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1. Equipment/Activity Identification

ID No.	Equipment/Activity	Control Measure/Equipment
1	Lumber Dry Kilns	Temperature Control
2	Planer #18 Shavings System	Process Enclosure, High Efficiency Filtration
3	Planer #19 Material Collection System	Process Enclosure, High Efficiency Filtration
4	Anti-Sapstain Systems – Planer #18/Planer #19	Process Enclosure
5	Anti-Sapstain Systems – End Spray	Process Enclosure
6	Trimmer Saw Dust Collection System	Process Enclosure, High Efficiency Filtration
7	Storage Bin – Bark	Process Enclosure
8	Storage Bin - Sawdust	Process Enclosure
9	Storage Bins – Wood Chip	Process Enclosure
10	Storage Bins – Planer Shavings	Process Enclosure
11	Emergency Fire Pump #1	Low Sulfur Fuel
12	Emergency Fire Pump #2	Low Sulfur Fuel
13	Chipper Room	Process Enclosure, Cyclone
14	Grade Stamper	None

2. Approval Conditions

The following tables detail the specific requirements of this permit. In addition to the requirements listed below, equipment at this facility may be subject to other federal, state, and local regulations. The permit requirement number is identified in the left-hand column. The text of the permit requirement is contained in the middle column. The emission unit, equipment, or activity to which the permit requirement applies is listed in the right-hand column.

ADP 23-3601 supersedes Order 12950, Order 10371, Order 4372 Amend 1, Order 97AQ-I087 Amend 1, and Order 95AQ-I079 in their entirety.

Emission Limits

Req. No.	Emission Limits	Equipment/ Activity ID No.																
1.	<p>Emissions from operation of the lumber dry kilns shall not exceed the following:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>VOC</td><td>43.78 tpy</td></tr><tr><td>PM/PM₁₀</td><td>2.22 tpy</td></tr><tr><td>Acetaldehyde</td><td>4.97 tpy</td></tr><tr><td>Acrolein</td><td>0.08 tpy</td></tr><tr><td>Formaldehyde</td><td>0.10 tpy</td></tr><tr><td>Methanol</td><td>4.80 tpy</td></tr><tr><td>Propionaldehyde</td><td>0.05 tpy</td></tr></table> <p>Compliance must be demonstrated using EPA Method OTM 26. Annual emissions must be determined from actual lumber throughput consistent with the methodology in Section 6 of the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	VOC	43.78 tpy	PM/PM ₁₀	2.22 tpy	Acetaldehyde	4.97 tpy	Acrolein	0.08 tpy	Formaldehyde	0.10 tpy	Methanol	4.80 tpy	Propionaldehyde	0.05 tpy	1
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2.	<p>Emissions from the Planer #18 shavings system baghouse shall not exceed the following:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>PM/PM₁₀</td><td>0.1 gr/dscf</td></tr></table> <p>Compliance must be demonstrated using EPA Method 5.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM/PM ₁₀	0.1 gr/dscf	2												
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PM/PM ₁₀	0.1 gr/dscf																	
3.	<p>Emissions from operation of the Planer #18 anti-sapstain spray system shall not exceed the following:</p> <table><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>Annual emissions must be determined from actual operation consistent with the methodology in Section 6 of the Technical Support Document for this Permit.</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	4								
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4.	<p>Emissions from operation of the Planer #19 anti-sapstain spray system shall not exceed the following:</p> <table><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>Annual emissions must be determined from actual coating usage consistent with the methodology in Section 6 of the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	VOC	31.9 tpy	4												
<u>Pollutant</u>	<u>Emission Limit</u>																	
VOC	31.9 tpy																	
5.	<p>Emissions from the trimmer saw dust collection system baghouse shall not exceed the following:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>PM/PM₁₀</td><td>0.005 gr/dscf</td></tr></table> <p>Compliance must be demonstrated using EPA Method 5.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM/PM ₁₀	0.005 gr/dscf	6												
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Req. No.	Emission Limits	Equipment/ Activity ID No.
6.	Visible emissions from the lumber dry kilns must not exceed 10% opacity for more than 3 minutes in any one hour period as determined by a Certified Observer certified in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).	1
7.	Visible emissions from the Planer #19 dust collection system baghouse must not exceed 10% opacity for more than 3 minutes in any one hour period as determined by a Certified Observer certified in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).	2

Operating Limits and Requirements

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
8.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
9.	The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facility-wide
10.	Each pollution control device/measure must be in use whenever the associated production equipment is in operation. Control devices must be operated and maintained in accordance with the manufacturer's specifications and operated in a manner that minimizes emissions.	1-14
11.	Emission units identified in this Permit must be maintained and operated in total and continuous conformity with the conditions identified in this Permit. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this Permit, including directing the facility to cease operations until corrective action can be completed.	1-14
12.	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.	1
13.	The maximum temperature of drying schedules used in the lumber dry kilns shall not exceed 212 °F.	1
14.	The lumber dry kilns shall only process western hemlock and Douglas fir lumber. 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.	1
15.	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.	2-4

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
16.	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.	3
17.	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.	4
18.	Sawmill wood residual bin loadout stations shall be equipped with two-sided wind shrouds or walls to minimize fugitive dust emissions.	7-10
19.	Fugitive dust from mobile source operation on gravel surfaces shall be controlled via watering.	7-10

Monitoring and Recordkeeping Requirements

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
20.	With the exception of data logged by a computerized data acquisition system, each record required by this Permit must include the date and the name of the person making the record entry. If a control device or process is not operating during a specific time period, a record must be made to that effect.	1-14
21.	All records required by this Permit must be kept for a minimum period of no less than five years and must be maintained in a form readily available for inspection by SWCAA representatives.	1-14
22.	All air quality related complaints, including odor complaints, received by the permittee and the results of any subsequent investigation or corrective action must be recorded for each occurrence.	Facility-wide
23.	Excess emissions and upset conditions must be recorded for each occurrence.	1-14

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
24.	<p>The following information must be collected, recorded at the intervals specified below, and maintained readily available on-site for inspection:</p> <ul style="list-style-type: none"> (a) Quantity and species of lumber dried in the dry kilns Recorded monthly (b) Maximum dry kiln dry bulb temperature Recorded for each dry kiln batch (c) Hours of Planer #18 Shavings System baghouse operation Recorded monthly (d) Hours of Planer #19 Collection System baghouse operation Recorded monthly (e) Quantity and type of anti-sapstain chemicals applied in the Planer #18 and #19 supply systems Recorded weekly (f) Quantity of lumber processed in the Planer #18 and #19 anti-sapstain systems Recorded weekly (g) Concentration of anti-sapstain chemicals applied in the Planer #18 and #19 anti-sapstain systems Recorded weekly (h) Quantity and type of anti-sapstain chemicals applied in the End Spray systems Recorded weekly (i) Hours of Sawmill-Trimmer Sawdust Collection System baghouse operation Recorded monthly (j) Quantity and type of wood residual throughput Recorded monthly (k) Hours of Fire Pump Engine operation Recorded monthly (l) Hours of Chipper Room operation Recorded monthly (m) Quantity and type of ink applied in the Grade Stamper Recorded monthly (n) Maintenance activities that may affect emissions from approved equipment Recorded for each occurrence (o) Air quality related complaints received by the permittee and resulting corrective action Recorded for each occurrence (p) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs) Recorded monthly 	1-14
25.	<p>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:</p> <ul style="list-style-type: none"> (a) Date and time of inspection; (b) Inspector(s) name/initials; (c) 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; (d) Whether there were any visible emissions from the baghouse (Y/N); (e) Other deficiencies, as appropriate; and (f) Follow-up action(s) to be performed by inspector, as appropriate. 	2

Emission Monitoring and Testing Requirements

There are no emission monitoring or testing requirements for the approved equipment cited in this ADP.

Reporting Requirements

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
26.	All air quality related complaints received by the permittee must be reported to SWCAA within three 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 corrective action taken in response to complaint (if any).	Facility-wide
27.	The permittee must notify SWCAA at least seven calendar days in advance of the use of any new material, which results in the emission of toxic or hazardous air pollutants not previously permitted. In response to the notification, SWCAA may require that a written report be submitted with the following: (a) A description of the proposed change(s) in materials with an SDS for each new material, (b) The date the change(s) is (are) to be made, (c) The change(s) in emissions of VOCs, TAPs, or HAPs occurring as a result of the change, and (d) A summary of any applicable requirement(s) that would apply as a result of the change(s). If the proposed emission rate of a new TAP exceeds the applicable SQER and/or other emission limits established by this Permit or otherwise circumvents an applicable requirement, New Source Review may be required prior to making the proposed change.	Facility-wide
28.	Excess emissions must be reported to SWCAA as follows: (a) As soon as possible, but no later than 12 hours after discovery for emissions that represent a potential threat to human health or safety; (b) As soon as possible, but no later than 48 hours after discovery for emissions which the permittee wishes to claim as unavoidable pursuant to SWCAA 400-107; and (c) No later than 30 days after the end of the month of discovery for all other excess emissions.	1-14
29.	Upset conditions must be reported to SWCAA as soon as possible after discovery. The permittee may provide notification to SWCAA via telephone. A message may be left on the answering machine for upset conditions that occur outside of normal business hours.	1-14
30.	Deviations from permit conditions must be reported no later than 30 days after the end of the month during which the deviation is discovered.	1-14

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
31.	<p>The following emission-related information must be reported to SWCAA by March 15th for the previous calendar year:</p> <ul style="list-style-type: none"> (a) Quantity and species of lumber dried in the dry kilns; (b) Maximum dry kiln dry bulb temperature; (c) Hours of Planer #18 Shavings System baghouse operation; (d) Hours of Planer #19 Collection System baghouse operation; (e) Quantity and type of anti-sapstain chemicals applied in the Planer #18 and #19 supply systems; (f) Quantity of lumber processed in the Planer #18 and #19 anti-sapstain systems; (g) Concentration of anti-sapstain chemicals applied in the Planer #18 and #19 anti-sapstain systems; (h) Quantity and type of anti-sapstain chemicals applied in the End Spray systems; (i) Hours of Sawmill-Trimmed Sawdust Collection System baghouse operation; (j) Quantity and type of wood residual throughput; (k) Hours of Fire Pump Engine operation; (l) Hours of Chipper Room operation; (m) Quantity and type of ink applied in the Grade Stamper; and (n) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs). 	1-14

3. General Provisions

Req. No.	General Provisions
A.	For the purpose of ensuring compliance with this Permit, duly authorized representatives of the Southwest Clean Air Agency must be permitted access to the Permittee's premises and the facilities being constructed, owned, operated and/or maintained by the Permittee for the purpose of inspecting said facilities. These inspections are required to determine the status of compliance with this Permit and applicable regulations and to perform or require such tests as may be deemed necessary.
B.	The provisions, terms, and conditions of this Permit bind the Permittee, its officers, directors, agents, servants, employees, successors and assigns, and all persons, firms, and corporations acting under or for the Permittee.
C.	The requirements of this Permit survive any transfer of ownership of the source or any portion thereof.
D.	This Permit must be posted conspicuously at or be readily available near the source.
E.	This Permit will be invalidated, in whole or in part, if construction or installation of any new or modified equipment has not commenced within eighteen (18) months from date of issuance, if construction is discontinued for a period of eighteen (18) months or more without prior SWCAA approval, or if construction is not completed within a reasonable time.

Req. No.	General Provisions
F.	This Permit does not supersede requirements of other agencies with jurisdiction and further, this Permit does not relieve the Permittee of any requirements of any other governmental agency. In addition to this Permit, the Permittee may be required to obtain permits or approvals from other agencies with jurisdiction.
G.	Compliance with the terms of this Permit does not relieve the Permittee from the responsibility of compliance with SWCAA General Regulations for Air Pollution Sources, previously issued Regulatory Orders, RCW 70A.15, Title 173 WAC or any other applicable emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply.
H.	If any provision of this Permit is held to be invalid, all unaffected provisions of the Permit will remain in effect and be enforceable.
I.	No change in this Permit will be made or be effective except as may be specifically set forth by written order of the Southwest Clean Air Agency upon written application by the Permittee for the relief sought.
J.	The Southwest Clean Air Agency may, in accordance with RCW 70A.15, impose such conditions as are reasonably necessary to assure the maintenance of compliance with the terms of this Permit, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act.