

Hampton Lumber Mills – WA, Inc. - Morton Facility

Air Operating Permit

Southwest Clean Air Agency
1308 NE 134th Street
Vancouver, WA 98685-2747
Telephone: (360) 574-3058

AIR OPERATING PERMIT #: SW97-5-R0-A

ISSUED TO: Hampton Lumber Mills -
WA Inc.
10166 US Hwy 12
Randle, WA 98377

PLANT SITE: Hampton Lumber Mills -
WA Inc. - Morton Facility
302 Morton Road
Morton, WA 98356

NATURE OF BUSINESS: Saw mill
SIC CODE: 2421
AIRS NUMBER: 53-041-00003
EFFECTIVE DATE: January 28, 1998
EXPIRATION DATE: January 28, 2003
RENEWAL APPLICATION DUE: January 28, 2002

PERMIT ENGINEER:

Vannessa McClelland, Air Quality Engineer

Date

REVIEWED BY:

Paul T. Mairose, Chief Engineer

Date

APPROVED BY:

Robert D. Elliott, Executive Director

Date

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I. ABBREVIATIONSList of Common Abbreviations

AOP	Air Operating Permit
BACT	Best available control technology
CO	Carbon monoxide
CFR	Code of Federal Regulations
DOE	Washington 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 and condition numbered "#"
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous air pollutant
IEU	Insignificant emission unit
IEU#	Insignificant emission unit numbered "#"
M#	Refers to a specific monitoring requirement numbered "#"
MSDS	Material safety data sheet
NR#	Nonapplicable requirement numbered "#"
NSR	New source review
NO _x	Oxides of nitrogen
O ₂	Oxygen
PM	Particulate matter
PM ₁₀	Particulate matter less than 10 microns in diameter
PTE	Potential to emit
R#	Refers to a specific reporting requirement numbered "#"
RACT	Reasonably available control technology
RCW	Revised Code of Washington
Region 10	Region 10 of the U.S. Environmental Protection Agency
Req-#	Applicable requirement numbered "#"
SO ₂	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) is authorized under the procedures established in WAC 173-401 and Title V of the 1990 Federal Clean Air Act Amendments. The terms and conditions of this permit describe the emission limitations, operating requirements, ambient monitoring, recordkeeping requirements, and reporting frequencies for the permitted source.

Permit terms and conditions are categorized into three categories: General Terms and Conditions, Plantwide Emission Standards/Limits, and Emission Unit Emission Standards/Limits. As used in this permit, there is no distinction between "terms" and "conditions". As such, "condition" shall mean the same as "terms and conditions" as referred to in Title V of the 1990 Federal Clean Air Act Amendments.

The conditions required under this permit are determined to be necessary to assure and provide for certification of compliance with applicable local, state, and federal air pollution regulations and standards. A comprehensive list of local, state, and federal air pollution regulations and standards that currently apply to emission units and other air pollution sources located at the permittee's facility is provided in Section V, "Applicable Requirements". These regulations and standards were determined to be applicable based on the equipment specifications and regulatory history of each emission unit as described in the Statement of Basis for this permit.

III. EMISSION UNIT IDENTIFICATION

<u>Emission Unit</u>	<u>Unit Name</u>	<u>Unit Description</u>
EU1	Log Yard	Logs are delivered to the facility by trucks and stored in a log yard on the north side of the facility. Entry roads to the log yard and truck staging areas are paved, but the log yard itself is not. Water suppression is used to control fugitive dust emissions.
EU2	Sawmill	Green dimensional lumber is produced from raw logs as part of this emission unit. Raw logs are received from the log yard and debarked. Debarked logs are trimmed and sized to specific dimensional sizes through the use of numerous saws. This emission unit produces both rough and finished lumber.

<u>Emission Unit</u>	<u>Unit Name</u>	<u>Unit Description</u>
EU3	Power House	A single hogged fuel boiler is operated to produce process steam for the facility's lumber dry kilns. All fuel is obtained from sawmill operations. Emissions from the boiler are controlled with a wet venturi scrubber and associated settling pond. Water from the settling pond is recirculated to the wet scrubber. Make-up water for the settling pond is provided from boiler blowdown and the facility's main water supply.
EU4	Dry Kilns	Green dimensional lumber from the sawmill is dried to a predetermined moisture content prior to surface finishing and shipment. Lumber is stacked on carts and loaded into the kilns. Kiln heat is provided by steam from the facility's hogged fuel boiler.

IV. GENERAL TERMS AND CONDITIONS

G1. Standard Provisions WAC 173-401-620(2) - [10/22/97]

- (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 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) *Emissions trading.* No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
- (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 therein 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.

G2. Report Submittals WAC 173-401-520 - [10/22/97]

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. All application forms, reports, and compliance certifications shall be submitted to SWCAA at the address listed below. Annual compliance certifications shall be submitted to both SWCAA and EPA at the addresses listed below.

Control Officer
SWCAA
1308 NE 134th Street
Vancouver, WA 98685

Administrator
US EPA
MS OAQ-108
1200 Sixth Avenue
Seattle, WA 98101

G3. Permit Revision WAC 173-401-530(6) - [10/22/97]

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

G4. Permit Duration WAC 173-401-610 - [10/22/97], WAC 173-401-710 - [10/22/97]

This permit shall be valid for a fixed term of 5 years. 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). 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.

G5. Duty to Supplement or Correct Application WAC 173-401-500(6) - [10/22/97]

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, an applicant 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.

G6. Emission Inventory WAC 173-400-105(1) - [9/20/93 SIP, 10/14/96 State Only], SWCAA 400-105(1) - [11/8/93 SIP, 3/18/01 Local Only]

The permittee shall submit an annual emission inventory report for the calendar year to SWCAA on the form supplied or approved by SWCAA no later than March 15th for the previous calendar year.

G7. Federally Enforceable Requirements WAC 173-401-625 - [10/22/97]

- (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.
- (b) Notwithstanding subsection (a), any terms and conditions included in this permit that are not required under the FCAA or under any of its applicable requirements are specifically designated as "state" or "local" only, and are not federally enforceable under the FCAA. Terms and conditions so designated are not subject to the requirements of WAC 173-401-810.

G8. Inspection and Entry WAC 173-401-630(2) - [10/22/97]

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 emission-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.

G9. Compliance Requirements WAC 173-401-630(3) - [10/22/97], WAC 173-401-510(2)(h)(iii)(A)&(B) - [10/22/97]

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.

G10. Compliance Certification WAC 173-401-630(5) - [10/22/97]

The permittee shall submit a compliance certification to SWCAA and the Administrator once per year. Each compliance certification shall include the following:

- (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.

G11. Permit Shield WAC 173-401-640 - [10/22/97]

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 70.94.030(19).

G12. Emergency Provision WAC 173-401-645 - [10/22/97]

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 if the conditions of WAC 173-401-645(3) are met. Burden of proof lies with the permittee.

G13. Transfer of Ownership or Operational Control WAC 173-401-720 - [10/22/97]

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.

G14. Reopenings for Cause WAC 173-401-730 - [10/22/97]

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 air operating permit 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.

G15. New Source Review WAC 173-400-110 - [9/13/96], WAC 173-400-141 - [10/14/96 State Only], WAC 173-460 - [7/21/98 State Only], SWCAA 400-110 - [3/18/01], SWCAA 400-141 - [3/18/01 Local Only], WAC 173-460 - [7/21/98 Local Only]

The permittee shall not construct or modify a source which is required to be reviewed under SWCAA 400-110 and -141 or WAC 173-460 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 G16.

G16. Portable Sources WAC 173-400-110(5) - [9/13/96], SWCAA 400-110(5) - [3/18/01]

Portable sources which locate temporarily at the site of air operating permit sources shall be allowed to operate at the temporary location without filing a Notice of Construction application provided that:

- (a) The source/emission units are registered with SWCAA;
- (b) The source/emission units have an Order of Approval to operate as a portable source;
- (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;
- (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; and

- (e) The owner(s) and/or resident(s) of immediately adjacent properties shall be notified by the owner(s) or operator(s) of the portable source in writing at least 10 business days prior to commencement of operations at the proposed location with copies mailed to SWCAA. Written notification to the adjacent landowners/residents shall be by certified mail with return receipt requested. Such written notification shall include a complete description of the proposed operation, the associated emission control provisions and equipment, the total estimated project emissions, the name, address and phone number of the person in charge of the operation, and the address and phone number for SWCAA. Written notification shall indicate that all comments shall be directed to SWCAA.

G17. Excess Emissions WAC 173-400-107 - [9/13/96], SWCAA 400-107 - [3/18/01]

The permittee shall report excess emissions to SWCAA as soon as possible. Excess emissions due to startup or shutdown conditions shall be considered unavoidable provided the source reports as required under subsection (3) of SWCAA 400-107 and adequately demonstrates that the excess emissions could not have been prevented.

G18. Confidentiality of Records and Information SWCAA 400-270 - [3/18/01 Local Only]

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 under the Freedom of Information Act 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.

G19. Open Burning WAC 173-425 - [1/1/93], SWCAA 425 - [3/18/01 Local Only]

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

G20. Asbestos 40 CFR 61 Subpart M - [7/1/00], WAC 173-400-075 - [10/14/96 State Only], SWCAA 400-075 - [3/18/01], SWCAA 476 - [3/18/01 Local Only]

The permittee shall comply with the provisions of SWCAA 476 when conducting any renovation or demolition activities at the facility.

G21. Protection of Stratospheric Ozone 40 CFR 82.150, Subpart F - [7/1/00]

The permittee shall comply with the standards for recycling and emission reduction as provided in 40 CFR Part 82, Subpart F.

G22. Chemical Accident Prevention 40 CFR 68 - [7/1/00]

The permittee shall comply with the requirements for preparation and implementation of a plan to address potential chemical releases as provided in 40 CFR 68.

V. APPLICABLE REQUIREMENTS

The following table lists all federal, state, and/or locally enforceable requirements applicable to the permittee. 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. The paraphrasing contained in the column labelled "Requirement Description" is intended only to generally state the relevant requirements for the purposes of the table, and does not in any way to alter or change the meaning of any requirement incorporated by reference in the column labelled "Applicable Requirement". In the event of conflict or omission between the information contained in the Requirement Description column and the Applicable Requirement column, the requirements and language of the actual statute or regulation cited shall govern. For more information regarding any of the requirements cited in the Applicable Requirement column, refer to the actual requirements cited.

Req. #	Applicable Requirement	Requirement Description	Emission Point	Monitoring	Reference Test Method
Req-1	WAC 173-400-040(1)(a)&(b) - [9/13/96] SWCAA 400-040(1)(a)&(b) - [3/18/01]	Permittee shall not cause or permit any emission which exceeds 20% opacity for more than three minutes, in any one hour.	Plantwide	M1	Visible Emissions Evaluation; SW97-5-R0-A, Appendix A
Req-2	WAC 173-400-040(2) - [9/13/96 State Only] SWCAA 400-040(2) - [3/18/01 Local Only]	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.	Plantwide	M4	N/A
Req-3	WAC 173-400-040(3)(a) - [9/13/96] SWCAA 400-040(3)(a) - [3/18/01]	Permittee shall take reasonable precautions to prevent the release of fugitive emissions from any emission unit which is a source of fugitive emissions.	Plantwide	M3	N/A
Req-4	WAC 173-400-040(4) - [9/13/96 State Only] SWCAA 400-040(4) - [3/18/01 Local Only]	Permittee shall use recognized good practice and procedures to reduce odors to a reasonable minimum.	Plantwide	M4	N/A
Req-5	WAC 173-400-040(5) - [9/13/96] SWCAA 400-040(5) - [3/18/01]	Permittee shall not cause or permit emissions detrimental to persons or property.	Plantwide	M4	N/A

Req. #	Applicable Requirement	Requirement Description	Emission Point	Monitoring	Reference Test Method
Req-6	WAC 173-400-040(6) - [9/13/96] SWCAA 400-040(6) - [3/18/01] Except second paragraphs of WAC 173-400-040(6) and SWCAA 400-040(6)(a)	Permittee shall not cause or permit any emission unit to emit a gas containing sulfur dioxide in excess of 1,000 ppm of sulfur dioxide on a dry basis, based on an average of sixty consecutive minutes.	Plantwide	M6	EPA Method 6, 40 CFR 60, Appendix A, July, 1996
Req-7	WAC 173-400-040(7) - [9/13/96] SWCAA 400-040(7) - [3/18/01]	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.	Plantwide	M5	N/A
Req-8	WAC 173-400-040(8)(a) - [9/13/96] SWCAA 400-040(8)(a) - [3/18/01]	Permittee shall take reasonable precautions to prevent emissions of fugitive dust and operate the source to minimize emissions.	Plantwide	M3	N/A
Req-9	WAC 173-400-050(1)&(3) - [9/13/96] SWCAA 400-050(1)&(3) - [3/18/01] Oxygen level exclusion provision of WAC 173-400-050(1) - [9/13/96 State Only] Oxygen level exclusion provision of SWCAA 400-050(1) - [3/18/01 Local Only]	Permittee shall not cause or permit emissions of particulate matter from a combustion or incineration emission unit in excess of 0.1 gr/dscf of exhaust gas corrected to 7% oxygen. Permittee shall not cause or permit emissions of particulate matter from an emission unit combusting wood derived fuels in excess of 0.2 gr/dscf of exhaust gas corrected to 7% oxygen.	Plantwide	M2	EPA Method 5, 40 CFR 60, Appendix A, July, 1996
Req-10	WAC 173-400-060 - [9/13/96] SWCAA 400-060 - [3/18/01]	Permittee shall not cause or permit emissions of particulate matter from a general process unit in excess of 0.1 gr/dscf of exhaust gas.	Plantwide	M2	EPA Method 5, 40 CFR 60, Appendix A, July, 1996
Req-11	SWCAA 88-1032, Hereby Ordered Section 2 - [1/16/89] SWCAA 96-1951, Section 9.b - [11/25/96]	Permittee shall not cause or permit any visible emission from approved operations which exceeds 0% opacity for more than three minutes, in any one hour.	EU2	M1	Visible Emissions Evaluation; SW97-5-R0-A, Appendix A
Req-12	SWCAA 95-1817, Sections 10.a-d - [1/8/96]	Emissions from lumber drying operations shall not exceed 46.0 tpy VOC, 2.5 tpy PM, 4.0 tpy toluene, and 2.0 tpy 2,2,2 trimethylpentane.	EU4	M8,M9	Dry Kiln VOC Testing, SW97-5-R0-A, Appendix A

Req. #	Applicable Requirement	Requirement Description	Emission Point	Monitoring	Reference Test Method
Req-13	SWCAA 95-1817, Section 10.e - [1/8/96]	Permittee shall not cause or permit any visible emission from lumber drying operations which exceeds 10% opacity for more than three minutes, in any one hour.	EU4	M1	N/A
Req-14	SWCAA 95-1817, Section 10.f - [1/8/96]	Lumber dry kilns are approved for drying pine, hem-fir, and douglas fir only.	EU4	M8	N/A
Req-15	SWCAA 95-1817, Section 10.h - [1/8/96]	Lumber drying kilns shall not operate at temperatures in excess of 250 °F.	EU4	M10	N/A
Req-16	SWCAA 96-1951, Section 9.a - [11/25/96]	PM emissions from the Nicholson barker and Can-Car saw/chipping unit shall not exceed 5.5 tpy.	EU2	M12	N/A
Req-17	SWCAA 96-1951, Section 9.c - [11/25/96]	Operation of the Nicholson barker and Can-Car saw/chipping unit is approved for green logs only.	EU2	M5	N/A
Req-18	SWCAA 97-2034, Section 11.a - [9/5/97]	PM emissions from hogged fuel boiler operation shall not exceed an exhaust concentration of 0.07 gr/dscf corrected to 7% O ₂ .	EU3	M2,M11	EPA Method 5, 40 CFR 60, Appendix A, July, 1996
Req-19	SWCAA 97-2034, Section 11.b - [9/5/97]	Visible emissions from operation of the hogged fuel boiler shall not exceed fifteen percent opacity for more than 3 minutes in any one hour period.	EU3	M1	Visible Emissions Evaluation; SW97-5-R0-A, Appendix A
Req-20	SWCAA 97-2034, Section 11.c&d - [9/5/97]	The wet scrubber shall operate with a minimum differential pressure of 30" w.c. and a minimum process water circulation rate of 240 gpm. The scrubber settling pond shall have a minimum capacity of 3,000 ft ³ and a minimum make-up water rate of 10 gpm.	EU3	M10	N/A
Req-21	SWCAA 97-2034, Section 11.e - [9/5/97]	Permittee shall install and maintain equipment capable of continuously monitoring the following parameters: scrubber process water circulation rate, settling pond make-up water flowrate, differential pressure across the scrubber, and excess oxygen concentration in the boiler.	EU3	M5	N/A

Req. #	Applicable Requirement	Requirement Description	Emission Point	Monitoring	Reference Test Method
Req-22	SWCAA 97-2034, Section 11.f - [9/5/97]	The wet scrubber water settling pond shall be monitored and maintained in accordance with the operations and maintenance plan submitted in Notice of Construction application L-384	EU3	M7	N/A

VI. NON-APPLICABLE REQUIREMENTS WAC 173-401-640(2) - [9/13/96]

The following table lists all federal, state, and/or local requirements which might reasonably apply to the permittee, but are deemed nonapplicable after review by SWCAA.

1. Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (Subpart Dc) 40 CFR 60.40c et seq. - [7/1/00]

Subpart Dc applies to all steam generation units for which construction, modification, or reconstruction is commenced after June 9, 1989, and that have a maximum design heat input between 10 million and 100 million Btu per hour. The hogged fuel boiler at this source has a design heat input between 10 million and 100 million Btu per hour, but was last modified prior to June 9, 1989. Therefore, this regulation is not applicable.

2. Standards of Performance for Incinerators (Subpart E) 40 CFR 60.50 et seq. - [7/1/00]

Subpart E applies to all incinerators with charging rates greater than 50 tons per day which commenced construction or modification after August 17, 1971. Pursuant to 40CFR60.51(a), an incinerator is defined as any "...furnace used in the process of burning solid waste for the purpose of reducing the volume of the waste by removing combustible matter." The hogged fuel boiler at this source has a charging rate greater than 50 tons per day, but its primary purpose is the production of process steam not the reduction of waste volume. Therefore, this regulation is not applicable.

3. Emission Standards for Combustion and Incineration Units WAC 173-400-050(2) - [9/13/96], SWCAA 400-050(2) - [3/18/01]

WAC 173-400-050(2) prohibits emissions of carbonyls from any incinerator in excess of 100 ppm total carbonyls as measured by applicable sampling methods. Pursuant to WAC 173-400-030(34), an incinerator is defined as "...a furnace used primarily for the thermal destruction of waste." The primary purpose of the hogged fuel boiler at this source is the production of process steam not the destruction of waste so this regulation is not applicable.

4. Registration program WAC 173-400-099 - [9/13/96 State Only], SWCAA 400-100(2) - [3/18/01]

The permittee is an air operating permit source. Pursuant to WAC 173-400-101(7), air operating permit sources are exempt from the registration program established under WAC 173-400-099, and implemented in accordance with WAC 173-400-100 through WAC 173-400-104. Pursuant to SWCAA 400-100(3)(a)(iv) air operating permit sources are exempt from the registration requirements of SWCAA 400-100(2).

5. Solid Waste Incinerator Facilities WAC 173-434 [10/18/90]

WAC 174-434 applies to all solid waste or solid waste derived fuel incinerator facilities constructed after January 1, 1985 with a design capacity greater than twelve tons per day

or constructed prior to January 1, 1985, which begin to burn twelve tons or more per day after January 1, 1985. Pursuant to WAC 173-434-030(3), the fuel used in the hogged fuel boiler is not included in the definition of solid waste. Therefore, this regulation is not applicable.

VII. MONITORING REQUIREMENTS

To assure compliance with all applicable requirements, the permittee shall perform the monitoring program specified below. Each monitoring requirement is indexed according to the underlying requirement(s). Pursuant to WAC 173-401-530(2)(c), the following monitoring requirements do not apply to IEUs.

M1. Opacity Monitoring WAC 173-401-615(1) - [10/22/97]

This monitoring requirement applies to Reqs-1,11,13,19.

The permittee shall perform monthly inspections of affected operations during daylight hours for the purpose of identifying potential visible emission violations. Whenever visible emissions are observed during the monthly inspection, or whenever visible emissions are indicated by a complaint, the permittee shall verify the equipment causing the emissions. The permittee shall within 60 minutes of observing visible emissions confirm that the equipment involved is not experiencing a malfunction and all air pollution control equipment is operating properly. The permittee shall either eliminate visible emissions within 24 hours of initial discovery or demonstrate compliance by recording opacity within three working days using the visual emission evaluation method in Appendix A of this permit. Implementation of corrective action does not relieve the permittee from the obligation of reporting permit deviations as specified in WAC 173-401-615(3). Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M2. Particulate Matter Emissions Monitoring WAC 173-401-615(1) - [10/22/97]

This monitoring requirement applies to Reqs-9,10,18.

The permittee shall perform monthly inspections of affected operations during daylight hours for the purpose of identifying potential particulate matter emission violations. Whenever visible emissions are observed during the monthly inspection, or whenever visible emissions are indicated by a complaint, the permittee shall verify the equipment causing the emissions. The permittee shall within 60 minutes of observing visible emissions confirm that the equipment involved is not experiencing a malfunction and all air pollution control equipment is operating properly. Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M3. Fugitive Emissions Monitoring WAC 173-401-615(1) - [10/22/97]

This monitoring requirement applies to Reqs-3,8.

The permittee shall record, and maintain record of, any complaints received by either the permittee or SWCAA. All complaints shall be investigated no later than one work day after the permittee has been notified. Investigation shall verify the validity of each complaint, the cause of emissions which prompted the complaint, and what, if any, corrective action was taken in response to the complaint.

In addition to complaint response, the permittee shall perform monthly inspections of affected operations during daylight hours for the purpose of identifying excess fugitive emissions. Whenever fugitive emissions are observed during the monthly inspection, the permittee shall verify the source of the emissions. The permittee shall within 60 minutes of discovery confirm that the equipment involved is not experiencing a malfunction, and that reasonable precautions and good work practices are being employed to minimize emissions. For purposes of this condition reasonable precautions shall include, but not be limited to, the following:

- a. Vent dry kiln emissions through an elevated stack when actively drying wood;
- b. Use a street sweeper, or similar type equipment, on a weekly basis during periods when significant rainfall has not occurred for 15 days or more, or more frequently as necessary to minimize dust accumulation on paved areas throughout the mill; and
- c. Use a water truck to apply water to unpaved traffic areas on a daily basis during periods when significant rainfall has not occurred for 15 days or more, or more frequently as necessary, to minimize fugitive road dust.

Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M4. Complaint Monitoring WAC 173-401-615(1) - [10/22/97]

This monitoring requirement applies to Reqs-2,4,5.

The permittee shall record, and maintain record of, any complaints received by either the permittee or SWCAA. All complaints shall be investigated no later than one work day after the permittee has been notified. Investigation shall verify the validity of each complaint, the cause of emissions which prompted the complaint, and what, if any, corrective action was taken in response to the complaint. Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M5. Compliance Certification WAC 173-401-615(1) - [10/22/97]

This monitoring requirement applies to Reqs-7,17,21.

The permittee shall certify the following in each semi-annual report:

- (a) Installed equipment does not conceal or mask any emissions which are otherwise in violation of general standards;

- (b) The Nicholson barker and Can-Car saw/chipper are used to process green logs only; and
- (c) Installed equipment is capable of monitoring the following parameters on a continuous basis:
 - (i) Scrubber water circulation rate;
 - (ii) Settling pond make-up water flowrate;
 - (iii) Pressure drop across the throat of the Zurn scrubber; and
 - (iv) Excess oxygen concentration in the boiler.

M6. SO₂ Emission Standard WAC 173-401-615(1) - [10/22/97]

This monitoring requirement applies to Req-6.

The permittee shall certify in each semi-annual report that only hogged fuel is used to fire the process boiler at the facility.

M7. Maintenance and Monitoring of Settling Pond SWCAA 97-2034, Section 11.i - [9/5/97]

This monitoring requirement applies to Req-22.

The permittee shall maintain and monitor settling pond water quality as follows:

- (a) The flocculent delivery system shall be monitored on a daily basis for proper function. Polymer flocculent shall be added to scrubber water on a daily basis as needed. The quantity of flocculent added shall be predetermined by the Respondent and the facility's water treatment consultant. Facility personnel shall correct delivery system malfunctions as soon as possible;
- (b) Scrubber water quality shall be visually evaluated on a daily basis using a standard procedure mutually agreed upon by the Respondent and SWCAA. Results of the visual evaluation shall be graded as excellent, normal, or poor. The Respondent shall take immediate corrective action whenever a poor result is encountered; and
- (c) Samples of the scrubber water shall be tested for total suspended solids on a quarterly basis.

Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M8. Emissions from Lumber Drying SWCAA 95-1817, Section 10.k - [1/8/96]

This monitoring requirement applies to Req-12,14.

The permittee shall record, and maintain record of, the species, quantity, and final moisture content of lumber dried in the facility's dry kilns on a monthly basis. Records shall be available for inspection no later than 30 days from the last day of the month. Compliance with specified emission limits is to be calculated based on lumber throughput and emission factors provided by M11. Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M9. Lumber Drying Emission Testing SWCAA 95-1817, Section 10.j - [1/8/96]

This monitoring requirement applies to Req-12.

The permittee shall emission test lumber drying operations prior to April 8, 1996, and every two years thereafter. Emission testing shall be conducted as specified in "Dry Kiln VOC Testing" in Appendix A of this permit. Specific emission testing may be waived by SWCAA upon written request from the permittee. Such a request must be justified based on the grounds that prior tests have shown compliance by a wide margin, and that adequate alternative evidence exists to show continuing compliance. Records of test results shall be maintained in accordance with Section VIII of this permit.

M10. Operations Monitoring WAC 173-401-615(1) - [10/22/97]

This monitoring requirement applies to Reqs-15,20.

The permittee shall perform monthly inspections of affected operations during daylight hours to confirm that equipment operation is in compliance with specified parameters. Whenever noncompliant conditions are observed during the monthly inspection, the permittee shall within 60 minutes of discovery confirm that the equipment involved is not experiencing a malfunction, and all air pollution control equipment is operating properly. Implementation of corrective action does not relieve the permittee from the obligation of reporting permit deviations as specified in WAC 173-401-615(3). Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M11. Boiler Emission Testing SWCAA 97-2034, Section 11.1 - [9/5/97]

This monitoring requirement applies to Req-18.

The permittee shall emission test the hogged fuel boiler prior to March 5, 1998, and every two years thereafter. Emission testing shall be conducted as specified in SWCAA 97-2034, Appendix B. Specific emission testing requirements may be waived by SWCAA upon written request from the permittee. Such a request must be justified based on the grounds that prior tests have shown compliance by a wide margin, and that adequate alternative evidence exists to show continuing compliance. Records of test results shall be maintained in accordance with Section VIII of this permit.

M12. PM Emissions from Barker and Saw/Chipper WAC 173-401-615(1) - [10/22/97]

This monitoring requirement applies to Req-16.

The permittee shall record, and maintain record of, the quantity of logs processed in the Nicholson barker and Can-Car saw/chipper on a monthly basis. Records shall be available for inspection no later than 30 days from the last day of the month. Compliance with specified emission limits is to be calculated based on recorded log throughput, emission factors, and control factors described in SWCAA 96-1951, Section 9.a. Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

VIII. RECORDKEEPING REQUIREMENTS WAC 173-401-615(2) - [10/22/97]

All monitoring records shall be maintained in a readily accessible form for a minimum period of five years. Pursuant to WAC 173-401-530(2)(c), none of the recordkeeping requirements apply to IEUs. The permittee shall maintain records of required monitoring per M1 through M12 as follows if applicable:

- (a) Inspections & Certifications
 - (i) The date, place, and time of activity;
 - (ii) Who conducted the inspection or certification;
 - (iii) The operating conditions existing at the time of the activity;
 - (iv) Compliance status of each monitored requirement as described in Section V and VII of this permit; and
 - (v) Corrective action taken in response to permit deviations and/or complaints.

- (b) Complaints
 - (i) The date, and time of complaint;
 - (ii) Name of the complainant;
 - (iii) The nature of the complaint;
 - (iv) Date and time of follow-up inspection; and
 - (v) Corrective action taken in response to complaint.

- (c) Sampling and Emission Testing
 - (i) The date sampling was performed;
 - (ii) The entity that performed the sampling;
 - (iii) The analytical techniques used to take the sample;
 - (iv) The operating conditions existing at the time of sampling or measurement;
 - (v) The date analyses were performed;
 - (vi) The entity that performed the analyses;
 - (vii) The analytical techniques or methods used;
 - (viii) The results of such analyses;
 - (ix) Compliance status of each monitored requirement as described in Section V and VII of this permit; and
 - (x) Corrective action taken in response to permit deviations.

- (d) Continuous Monitoring
 - (i) The date, averaging time for each variable monitored;
 - (ii) Data reduced to the appropriate averaging time;
 - (iii) Periods that data was unavailable excluding calibration periods;
 - (iv) Calibration corrections performed and date of correction;
 - (v) Calibration gas certifications and expiration date;
 - (vi) Compliance status of each monitored requirement as described in Section V and VII of this permit; and
 - (vii) Corrective action taken in response to permit deviations.

- (e) Material Purchases
 - (i) The type and quantity of production material purchased;
 - (ii) The month in which the production material was purchased; and
 - (iii) Chemical component information for each production material.

IX. REPORTING REQUIREMENTS

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.

R1. Deviations from Permit Conditions WAC 173-401-615(3)(b) - [10/22/97]

Deviations from permit requirements shall be reported no later than thirty days after each deviation is discovered. Deviations which 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. Reports of deviations shall include:

- (a) Whether or not the deviation was due to an upset condition;
- (b) The probable cause of the deviation; and
- (c) The corrective action taken.

R2. Complaint Reports WAC 173-401-615(3) - [10/22/97]

The permittee shall report all complaints to SWCAA within three days of receipt. Complaint reports shall include the date and time of the complaint, the name of the complainant, and the nature of the complaint.

R3. Semi-annual Reports WAC 173-401-615(3) - [10/22/97]

The permittee shall submit to SWCAA by October 15th and April 15th for the six month periods January through June and July through December, respectively, the following information:

- (a) Records of all required monitoring, and any deviation from permit requirements shall be clearly identified; and
- (b) Certification of monitoring records by a responsible official consistent with the provisions of WAC 173-401-520.

R4. Annual Reports WAC 173-401-630(5) - [10/22/97]

The permittee shall submit to SWCAA and EPA Region X certification of compliance with all terms and conditions of this permit in accordance with WAC 173-401-630(5)(d). The permittee shall submit by April 15th of the following year the following information for the period of January through December:

- (a) Identification of each term or condition of the permit that is the basis of the certification;
- (b) The compliance status;
- (c) Whether compliance was continuous or intermittent; and
- (d) The method(s) used to determine the compliance status.

R5. Emission Inventory Reports WAC 173-400-105 - [9/20/93 SIP, 10/14/96 State Only], SWCAA 400-105 - [11/8/93 SIP, 3/18/01 Local Only]

The permittee shall submit an inventory of annual emissions from the source each year to SWCAA by March 15th of the following year in accordance with SWCAA 400-105. The inventory shall include emissions of PM from the saw mill, NO_x, CO, VOCs, and PM from the hogged fuel boiler, and VOCs, HAPs, and TAPs from lumber drying.

R6. Source Test Reports WAC 173-401-615(3) - [10/22/97]

Whenever source testing is required, the permittee shall submit test results within 45 days of test completion.

APPENDIX A**A1. VISIBLE EMISSION EVALUATION METHOD**1. Principle

The opacity of emissions from stationary sources is determined visually by a qualified observer.

2. Procedure

The observer must be certified in accordance with the provisions of Section 3 of 40 CFR Part 60, Appendix A, Method 9, as in effect on July 1, 1996.

The observer shall stand at a distance sufficient to provide a clear view of the emissions with the sun oriented in the 140° sector to his back. Consistent with maintaining the above requirement, the observer shall, as much as possible, make his observations from a position such that his line of vision is approximately perpendicular to the plume direction, and when observing opacity of emissions from rectangular outlets (e.g., roof monitors, open baghouses, noncircular stacks), approximately perpendicular to the longer axis of the outlet. The observer's line of sight should not include more than one plume at a time when multiple stacks are involved, and in any case, the observer should make his observations with his line of sight perpendicular to the longer axis of such a set of multiple stacks (e.g., stub stacks on baghouses).

The observer shall record the name of the plant, emission location, type of facility, observer's name and affiliation, and the date on a field data sheet. The time, estimated distance to the emission location, approximate wind direction, estimated wind speed, description of the sky condition (presence and color of clouds), and plume background are recorded on a field data sheet at the time opacity readings are initiated and completed.

Opacity observations shall be made at the point of greatest opacity in the portion of the plume where condensed water vapor is not present. The observer shall not look continuously at the plume, but instead shall observe the plume momentarily at 15 second intervals.

When condensed water vapor is present within the plume as it emerges from the emission outlet, opacity observations shall be made beyond the point in the plume at which condensed water vapor is no longer visible.

When water vapor in the plume condenses and becomes visible at a distinct distance from the emission outlet, the opacity of emissions should be evaluated at the emission outlet prior to the condensation of water vapor and the formation of the steam plume.

Opacity observations shall be recorded to the nearest 5 percent at 15 second intervals on an observational record sheet. Each momentary observation recorded shall be deemed to represent the average opacity of emissions for a 15 second period.

3. Analysis

The opacity of the plume is determined by individual visual observations. Opacity shall be reported as the range of values observed during a specified time period, not to exceed 60 consecutive minutes. The opacity standard is exceeded if there are more than 12 observations, during any consecutive 60 minute period, for which an opacity greater than the standard is recorded.

4. References

Federal Register, Vol. 36, No. 247, page 24895, December 23, 1971.

"Criteria for Smoke and Opacity Training School 1970 - 1971" Oregon-Washington Air Quality Committee."

"Guidelines for Evaluation of Visible Emissions" EPA 340/1-75-007."

A2. DRY KILN VOC TESTING

(Attached)