SWCAA
Southwest Clean Air Agency

11815 NE 99th Street, Suite 1294
Vancouver, WA 98682
(360) 574-3058
www.swcleanair.org

November 6, 2020

Mr. Kurt Russell, Operations Manager
Willamette Valley Company
PO Box 2280
Eugene, OR 97402

Subject: Final Air Discharge Permit for New Sifters, Material Handling Equipment and Packaging System

Dear Mr. Russell:

A final determination to issue Air Discharge Permit 20-3438 (ADP 20-3438) has been completed for Air Discharge Permit (ADP) Application L-714 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 L-714 was published in the permit section of SWCAA's internet website on September 29, 2020. SWCAA did not receive a request for a public comment period in response to the public notice and has concluded that significant public interest does not exist for this determination. Therefore, a public comment period will not be provided for this permitting action. Electronic copies of ADP 20-3438 and the associated Technical Support Document are available for public review in the permit section of SWCAA's internet website (http://www.swcleanair.org/permits/adpfinal.asp). Original copies are enclosed for your files.

This Air Discharge Permit may be appealed directly to the Pollution Control Hearings Board (PCHB) at P.O. Box 40903, Olympia, Washington 98504-0903 within 30 days of receipt as provided in RCW 43.21B.

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
Attachment

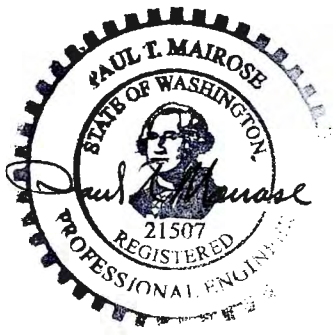
SWCAA
Southwest Clean Air Agency

AIR DISCHARGE PERMIT
20-3438

Final: November 6, 2020

Facility Name: Willamette Valley Company
Physical Location: 1830 Central Blvd
Centralia, WA 98531

SWCAA ID: 659



REVIEWED BY: _____
Paul T. Mairose, Chief Engineer

APPROVED BY: _____
Uri Papish, Executive Director

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1. Equipment/Activity Identification

ID No.	Generating Equipment/Activity	# of Units	Control Measure/Equipment	# of Units
1	Bark Dehydrator - Heil (12.5 MMBtu/hr Nat Gas, 10.0 MMBtu/hr wood)	1	Process Enclosure Cyclone (Carothers – 8.5' dia) Baghouse (Carothers – 20,000 acfm)	2
2	Wood Heater Fuel Bin	1	Process Enclosure, Baghouse (Pulse Jet Filter – 1,800 acfm)	1
3	Bark Grinder #1 (Pulvocron - 200hp)	1	Process Enclosure, Baghouse (Flex Kleen – 3,000 acfm)	1
4	Bark Grinder #2 (Pulvocron - 200hp)	1	Process Enclosure, Baghouse (Flex Kleen – 3,000 acfm)	1
5	Bark Grinder #3 (Pulvocron - 200hp)	1	Process Enclosure, Baghouse (Flex Kleen – 2,500 acfm)	1
6	Bark Grinder #4 (Pulvocron - 200hp)	1	Process Enclosure, Baghouse (Flex Kleen – 2,500 acfm)	1
7	Bark Grinder #5 (Pulvocron - 200hp)	1	Process Enclosure, Baghouse (Flex Kleen – 3,000 acfm)	1
8	Flour Blender (Munson Machinery)	1	Process Enclosure, Baghouse (Grinding & Sizing – 3,000 acfm)	1
9	Flour Transfer System	1	Process Enclosure, Baghouse (Carothers and Sons – 400 acfm)	1

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.

This Permit supersedes Air Discharge Permit 14-3096 in its entirety.

Emission Limits

No.	Emission Limits	Equipment/ Activity
1.	Emissions from the Heil Bark Dehydrator must not exceed the following: Pollutant — Emission Limit NO_x — 21.46 tpy CO — 10.95 tpy VOC — 0.75 tpy SO_2 — 1.10 tpy PM/PM_{10} (filterable) — 7.51 tpy $PM_{2.5}$ (filterable) — 6.23 tpy Annual emissions must be calculated from actual fuel consumption, hours of operation and the most recent emission test data consistent with the methodology found in Section 6 of the Technical Support Document for this Permit.	1
2.	Emission rates from the Heil Bark Dehydrator must not exceed the following: Pollutant — Emission Limit NO_X — 0.49 lb/MMBtu CO — 0.25 lb/MMBtu PM/PM_{10} (filterable) — 0.010 gr/dscf (wood heater) PM/PM_{10} (filterable) — 0.005 gr/dscf (natural gas heater) The NO_X and CO emission limits identified above for wood combustion must not apply during periods of start-up and shutdown. A startup period begins with the introduction of fuel to the wood heater, and ends with the attainment of a steady combustion zone temperature of 1,000°F. A shutdown period begins with the initiation of shutdown procedures, and ends with cessation of operation. In no event, must applicability of the NO_X and CO emission limits be suspended for greater than 1 hour during each startup or shutdown period.	1
3.	Visible emissions from the Heil Bark Dehydrator must not exceed 5% opacity for more than 3 minutes in any one-hour period as determined by a Certified Observer in accordance with SWCAA Method 9.	1
4.	Combined emissions from operation of the Bark Grinder and Fuel Bin Baghouses must not exceed: Pollutant — Emission Limit PM/PM_{10} — 2.96 tpy Annual emissions must be calculated from actual hours of operation consistent with the methodology found in Section 6 of the Technical Support Document for this Permit.	2-7
5.	Emissions from operation of the Blender Baghouse must not exceed: Pollutant — Emission Limit PM/PM_{10} — 0.56 tpy Annual emissions must be calculated from actual hours of operation consistent with the methodology found in Section 6 of the Technical Support Document for this Permit.	8

No.	Emission Limits	Equipment/ Activity
6.	Emissions from operation of the Packaging Baghouse must not exceed: Pollutant — Emission Limit PM/PM_{10} — 0.08 tpy Annual emissions must be calculated from actual hours of operation consistent with the methodology found in Section 6 of the Technical Support Document for this Permit.	9
7.	PM/PM_{10} emission concentrations in baghouse exhaust streams must not exceed 0.005 gr/dscf.	2-9
8.	Visible emissions from approved equipment must not exceed 0% opacity for more than 3 minutes in any one hour period as determined using SWCAA Method 9 (See Appendix A of SWCAA 400).	2-9

Operating Limits and Requirements

No.	Operating Limits and Requirements	Equipment/ Activity
9.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facilitywide
10.	The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facilitywide
11.	Wet suppression techniques must be used as necessary to minimize fugitive emissions from haul roads, storage piles, and material processing.	Facilitywide
12.	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.	1-9
13.	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.	1-9
14.	Each baghouse must be equipped with a differential pressure gauge capable of continuously measuring differential pressure across filtration media in the baghouse.	1-9
15.	The bark dehydrator must only be fired on natural gas or clean, dry wood. Wood fuel must not contain any paint, preservatives, or non-wood contaminants. Wood fuel must be stored in an enclosed manner to minimize water absorption. Maximum moisture content of wood fuel must not exceed 15% by weight.	1
16.	The bark dehydrator's two process heaters (natural gas, wood) must not be operated concurrently.	1
17.	The bark dehydrator's wood fired heater must be equipped with a temperature gauge capable of continuously measuring combustion zone temperature in the heater.	1

No.	Operating Limits and Requirements	Equipment/ Activity
18.	The combustion zone temperature of the wood fired heater must be maintained at, or above, 1,000°F. This requirement does not apply during periods of start-up or shutdown.	1
19.	Exhaust gases from the bark dehydrator must be discharged through the bark dehydrator baghouse. The abort gate on the wood fired heater must be kept closed at all times during regular operation. Any event that causes exhaust gases to be discharged through the abort gate must be recorded and reported as an upset condition.	1
20.	Exhaust gases from the bark dehydrator baghouse must be discharged vertically at a minimum of 30' above ground level. Any device that obstructs or prevents vertical discharge is prohibited. The dehydrator baghouse exhaust stack must be configured to allow emission testing pursuant to EPA reference test methodology.	1
21.	Corrective action must be taken within 7 days if emission monitoring results for the wood fired heater indicate emission concentrations in excess of the levels listed below. Corrective action includes, but is not limited to, service by maintenance personnel or retesting for each pollutant of concern using a reference test method. Corrective action must be pursued until observed emission concentrations no longer exceed the levels listed below. Pollutant — Corrective Action Threshold (wood fired heater) NO_X — 314 ppmvd @ 7% O_2 CO — 263 ppmvd @ 7% O_2	1
22.	Exhaust air from approved equipment must be discharged vertically into the ambient air above the level of the building roof. Any device that obstructs or prevents vertical discharge is prohibited.	8-9

Monitoring and Recordkeeping Requirements

No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity
23.	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.	1-9
24.	All records required by this Permit must be kept for a minimum period of no less than three years and must be maintained in a form readily available for inspection by SWCAA representatives.	1-9
25.	Excess emissions and upset conditions must be recorded for each occurrence.	1-9

No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity
26.	The permittee must monitor and record the following information: (a) Differential pressure across filter media in each baghouse — Recorded daily (b) Combustion zone temperature in the Energy Unlimited process heater — Recorded daily when in operation (c) Wood and natural gas fuel consumption for the bark dehydrator — Recorded monthly (d) Hours of baghouse operation — Recorded monthly for each unit (e) Results of wood fuel analyses (heat/moisture/nitrogen contents) — Recorded for each analysis (f) Filter changes and maintenance activities — Recorded for each occurrence.	1-9

Emission Monitoring and Testing Requirements

No.	Emission Monitoring and Testing Requirements	Equipment/ Activity
27.	The bark dehydrator must be emission tested while firing each of the approved fuels (natural gas, wood) no later than October 2013. Periodic emission testing while firing each of the approved fuels must be conducted every five years thereafter, no later than October of the year in which testing is due. Emission testing must be conducted in accordance with the protocol presented in Appendix A of this Permit.	1
28.	The Heil Bark Dehydrator must be emission monitored while firing each of the approved fuels no later than October 2010. Subsequent emission monitoring while firing each of the approved fuels must be conducted on a 12-month cycle, no later than the end of October each year. Emission monitoring must be performed in accordance with the protocol presented in Appendix B of this Permit. Emission monitoring is not required in any year when emission testing is conducted pursuant to Requirement #27 of this Permit.	1

Reporting Requirements

No.	Reporting Requirements	Equipment/ Activity
29.	All air quality related complaints received by the permittee must be reported to SWCAA within three days of receipt.	Facilitywide
30.	An annual emissions inventory report must be submitted in accordance with SWCAA 400-105(1). In addition to the emissions information required under SWCAA 400-105(1), each annual report must include an estimate of annual emission quantities for each TAP compound listed in the Technical Support Document for this Permit.	1-9

No.	Reporting Requirements	Equipment/ Activity
31.	Excess emissions must be reported to SWCAA as follows: • As soon as possible, but no later than 12 hours after discovery for emissions that represent a potential threat to human health or safety; • 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(1); and • No later than 30 days after the end of the month of discovery for all other excess emissions.	1-9
32.	The following operational data must be reported to SWCAA in writing by March 15 for the previous calendar year: (a) Bark dehydrator fuel consumption (wood and natural gas), (b) Results of each wood fuel analysis (heat/moisture/nitrogen contents), (c) Hours of operation for each baghouse, and (d) Air emissions.	1-9
33.	Emission test results must be reported to SWCAA in writing within 45 days of test completion.	1
34.	Emission monitoring results must be reported to SWCAA in writing within 15 days of completion.	1
35.	Initial start-up of the Packaging Baghouse must be reported to SWCAA within 10 days of commencing operation.	9

3. General Provisions

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 invalid if construction has not commenced within eighteen (18) months from date of issuance, if construction is discontinued for a period of eighteen (18) months or more, or if construction is not completed within a reasonable time.
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.

No.	General Provisions
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 70.94, 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 70.94 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.

Air Discharge Permit 20-3438 - Appendix A
Emission Testing Requirements
Heil Bark Dehydrator

1. **Introduction:**
   The purpose of this testing is to quantify emissions from the Heil Bark Dehydrator and demonstrate compliance with the requirements of this Permit and applicable air quality regulations.

2. **Testing Requirements:**
   a. **Test plan.** A comprehensive test plan must be submitted to SWCAA for review and approval at least 10 business days prior to each test. SWCAA personnel must be informed at least 5 business days prior to testing so that a representative may be present during testing.

   b. **Test Location.** All sampling must be performed at the exhaust stack of the bark dehydrator baghouse.

   c. **Test runs/Reference test methods.** For each fuel to be tested, a minimum of three (3) test runs must be performed for each constituent listed below to ensure the data are representative. Compliance must be demonstrated by averaging the results of the individual sampling runs. The sampling methods identified below must be used unless alternate methods are approved in writing by SWCAA in advance of the emission testing.

Constituent	Reference Test Method	Minimum Test Run Duration
Flow rate, temperature	EPA Methods 1 and 2	N/A
O_2, CO_2 content	EPA Method 3 or 3A	60 minutes
Moisture content	EPA Method 4	60 minutes
PM	EPA Method 5	60 minutes
CPM (wood)	EPA Method 202	60 minutes
NO_x	EPA Method 7E	60 minutes
CO	EPA Method 10	60 minutes
VOC	EPA Method 25A	60 minutes
Opacity	SWCAA Method 9	60 minutes*
Fuel heat content (wood)	ASTM D2015 or equivalent	N/A
Fuel moisture content (wood)	ASTM D2016 or equivalent	N/A
Fuel nitrogen content (wood)	AOAC 978.02 or equivalent	N/A

   * If no visible emissions are observed during the first 15 minutes of each test run, observations may cease.

3. **Source Operation:**
   a. **Source operations.** Source operations during the emissions test must be representative of maximum intended operating conditions.

Air Discharge Permit 20-3438 - Appendix A
Emission Testing Requirements
Heil Bark Dehydrator

3. **Source Operation (con't):**
   b. **Record of production parameters.** Production related parameters and equipment operating conditions must be recorded during emissions testing to correlate operating conditions with emissions. All recorded production parameters must be documented in the test results report. Recorded parameters must, at a minimum, include:
      (1) Process startups and shutdowns,
      (2) Calculated heat input to the heater for each test run,
      (3) Combustion zone temperature (wood heater), and
      (4) Dry bark production rate.

4. **Reporting Requirements:**
   a. **Test Report.** A final emission test report must be prepared and submitted to SWCAA within 45 calendar days of test completion and, at a minimum, must contain the following information:
      (1) Description of the source including manufacturer, model number and design capacity of the equipment, and the location of the sample ports or test locations,
      (2) Time and date of the test and identification and qualifications of the personnel involved, including SWCAA personnel who observed the testing,
      (3) Summary of results, reported in units and averaging periods consistent with the application emissions standard or unit,
      (4) Summary of control system or equipment operating conditions,
      (5) Summary of production related parameters,
      (6) A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation,
      (7) A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation,
      (8) Copies of field data and example calculations,
      (9) Chain of custody information,
      (10) Calibration documentation,
      (11) Discussion of any abnormalities associated with the results, and
      (12) A statement signed by the senior management official of the testing firm certifying the validity of the source test report.

   b. **Test Results.** Test results must be reported in units of concentration (ppmv, gr/dscf), emission rate (lb/hr), and emission per unit of heat input (lb/MMBtu).

5. **Changes to Testing Requirements:**
   Emission testing must be conducted as specified in the sections above. The Permittee may submit a written request to SWCAA for approval of minor modifications to the requirements above or the testing schedule. Upon review of the request and in accordance with EPA delegation, SWCAA will inform the Permittee in writing of any approved modifications.

Air Discharge Permit 20-3438 - Appendix B
Emission Monitoring Requirements
Heil Bark Dehydrator

1. **Introduction:**
   a. The purpose of periodically monitoring exhaust gases from the bark dehydrator is to minimize emissions and provide a reasonable assurance that the unit is operating properly.

   b. Periodic monitoring may be conducted with an electrochemical cell combustion analyzer, analyzers used for reference method testing, or other analyzers pre-approved by SWCAA.

2. **Monitoring Procedure:**
   a. Monitoring must be conducted to determine emission concentrations of the constituents listed below. Sampling for the wood fired heater must be performed at a point between the heater exhaust and the drying chamber of the dehydrator. Sampling for the natural gas fired heater must be performed at the exhaust stack of the dehydrator baghouse.

      Constituents to be Measured
      Carbon Monoxide (CO)
      Nitrogen Oxides (NO_X)
      Oxygen (O_2)

   b. Source operation during testing must be representative of maximum intended operating conditions during that year.

   c. Alternative testing methodologies must be pre-approved by SWCAA.

3. **Minimum Quality Assurance/Quality Control Measures:**
   a. The analyzer(s) response to span gas of a known concentration must be determined before and after testing. No more than 12 hours may elapse between span gas response checks. The results of the analyzer response must not be valid if the pre and post response check results vary by more than 10% of the known span gas value.

   b. The CO and NO_X span gas concentrations must be no less than 50% and no more than 200% of the emission concentration corresponding to the permitted emission limit. Ambient air may be used to zero the CO and NO_X cells/analyzer(s) and span the oxygen cell/analyzer.

   c. Sampling must consist of at least 1 test consisting of at least 5 minutes of data collection following a "ramp-up phase." The "ramp-up phase" ends when analyzer readings have stabilized (less than 5% per minute change in emission concentration). Emission concentrations must be recorded at least once every 30 seconds during the data collection phase. All test data collected following the ramp-up phase(s) must be reported to SWCAA. A sample data sheet is attached for reference.

Air Discharge Permit 20-3438 - Appendix B
Emission Monitoring Requirements
Heil Bark Dehydrator

4. Reporting:

a. All monitoring results must be recorded at the facility and reported to SWCAA in writing within 15 calendar days of completion. The following information must be included in the report:

(1) Time and date of the performance monitoring;
(2) Identification of the personnel involved;
(3) A summary of results, reported in units consistent with the applicable emission standard or limit;
(4) A summary of equipment operating conditions;
(5) A description of the evaluation methods or procedures used including all field data, quality assurance/quality control procedures and documentation; and
(6) Analyzer response check documentation.

b. Reported monitoring results must be adjusted to reflect analyzer response to the zero and span gas.

SWCAA
Southwest Clean Air Agency

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Vancouver, WA 98682
(360) 574-3058
www.swcleanair.org

State Environmental Policy Act

DETERMINATION OF NONSIGNIFICANCE (DNS) – SWCAA 20-039

Description of proposal:

ADP Application L-714: Replacement of existing bark flour sifters, material handling and packaging equipment with new equipment of similar size and capacity. No changes are proposed to the remainder of existing operations. The general nature and capacity of existing facility operations will not change. The proposed project does not involve any building construction or excavation. There is no identified significant impact to media other than air. Air emissions will be minimized through the use of process enclosure and high efficiency filtration.

Proponent: Willamette Valley Company, LLC (Kurt Russell, Operations Manager)

Location of proposal, including street address if any:

1830 Central Blvd in Centralia, Washington 98531

Lead agency: Southwest Clean Air Agency

The lead agency for this proposal has determined that it does not have a probable significant impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.

☒ **There is no comment period for this DNS.**

☐ **This DNS is issued after using the optional DNS process in WAC 197-11-355. There is no further comment period in the DNS.**

☐ **This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 15 days from the date below. Comments must be submitted by _____.**

Responsible official: Paul T. Mairose, P.E.
Position/title: Chief Engineer

Address: Southwest Clean Air Agency
11815 NE 99th St, Suite 1294
Vancouver, WA 98682-2322
Phone: (360) 574-3058, ext 130

Signature: Paul T Mairose Date: 11/6/2020