June 23, 2010

Mr. Scott North  
Sierra Pacific Industries, Inc.  
3115 Kuper Rd  
Centralia, WA 98531

Re: Issuance of FINAL Title V Air Operating Permit SW10-16-R0

Dear Mr. North:

The Southwest Clean Air Agency (SWCAA) is issuing a final initial Title V permit to Sierra Pacific Industries, Inc. Copies of the final initial Air Operating Permit and Title V Basis Statement are accompanied with this letter. In addition, copies of the final permit will be available on SWCAA's website at www.swcleanair.org. If you have any questions or comments, please contact me at (360) 574-3058 ext. 129.

Sincerely,

Vannessa McClelland  
Air Quality Engineer

Attachment

C: Nancy Helm, Manager; Federal and Delegated Air Programs  
US EPA Region 10, Office of Air Waste and Toxics  
1200 6th Avenue, MS AWT-107  
Seattle, WA 98101
Sierra Pacific Industries, Inc. – Centralia Sawmill

Air Operating Permit

SW10-16-R0

Final Issued: June 23, 2010

Southwest Clean Air Agency
11815 NE 99 St., Ste 1294
Vancouver, WA 98682
Telephone: (360) 574-3058
AIR OPERATING PERMIT #: SW10-16-R0

ISSUED TO: Sierra Pacific Industries, Inc.  
3115 Kuper Road  
Centralia, WA 98531

PLANT SITE: Sierra Pacific Industries, Inc.  
Centralia Sawmill  
3115 Kuper Road  
Centralia, WA 98531

NATURE OF BUSINESS: Saw mill

SIC/NAICS CODE: 2421/321113

AIRS NUMBER: 053-041-00022

EFFECTIVE DATE: June 23, 2010

EXPIRATION DATE: June 23, 2015

RENEWAL APPLICATION DUE: December 23, 2014

PERMIT ENGINEER: Vanessa 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. ABBREVIATIONS

List of Common Abbreviations

ADP  Air Discharge Permit (aka Order of Approval)
AOP  Air Operating Permit
BACT  Best available control technology
BF  Board feet
CAM  Compliance Assurance Monitoring
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 "#"
MACT  Maximum Available Control Technology
MSDS  Material safety data sheet
NESHAPS  National Emission Standards for Hazardous Air Pollutants
NR#  Nonapplicable requirement numbered "#"
NSR  New source review
NOx  Oxides of nitrogen
O2  Oxygen
PM  Particulate matter
PM10  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 "#"
SERP  Source Emission Reduction Plan
SO2  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 divided into the following categories: Permit Provisions, General Terms and Conditions, Operating Terms and Conditions, Monitoring Requirements, Recordkeeping Requirements, and Reporting Requirements. 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 requirements and standards.

A comprehensive list of the local, state, and federal air pollution requirements applicable to emissions units and other air pollution sources located at the permittee's facility is provided in Sections V through X. These requirements were determined applicable based on the equipment specifications and regulatory history of each emission unit as described in the Basis Statement for this permit. These requirements are drawn from numerous regulations. The date of each requirement generally coincides with the most recent rulemaking activity. In some cases, there are multiple effective dates that reflect differences in federal versus state/local applicability. This situation is most notable with requirements that are in the Washington SIP. To clarify which version of a requirement is applicable to the facility, the effective dates of applicable requirements are presented in the following table:

<table>
<thead>
<tr>
<th>Regulation</th>
<th>SIP Federal Effective Date</th>
<th>State/Local Effective Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>40 CFR 51</td>
<td>--</td>
<td>7/1/09</td>
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<tr>
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<td>40 CFR 63</td>
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<tr>
<td>WAC 173-400-700</td>
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<td>5/20/2009</td>
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<td>WAC 173-401</td>
<td>---</td>
<td>10/17/2002</td>
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<tr>
<td>SWCAA 400-040(3)(a)</td>
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<td>11/15/2009</td>
</tr>
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</table>
### III. EMISSION UNIT IDENTIFICATION

<table>
<thead>
<tr>
<th>ID #</th>
<th>Generating Equipment/Activity</th>
<th>Emission Control</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-1</td>
<td>Log Yard</td>
<td>Wet suppression/water truck</td>
</tr>
<tr>
<td>EU-2</td>
<td>Sawmill - Planer, Bunkers</td>
<td>Total enclosure, baghouse (Carothers and Son), partial enclosure/wind screens</td>
</tr>
<tr>
<td>EU-3</td>
<td>Nebraska Hog Fuel Boiler</td>
<td>One multiclone followed by a two-field ESP and SNCR</td>
</tr>
<tr>
<td>EU-4</td>
<td>Dry Kilns</td>
<td>Process temperature limit</td>
</tr>
<tr>
<td>EU-5</td>
<td>Anti-Stain Treatment</td>
<td>Mist eliminator</td>
</tr>
</tbody>
</table>

**Regulation**

<table>
<thead>
<tr>
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<th>State/Local Effective Date</th>
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<tr>
<td>SWCAA 476</td>
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<td>3/18/2001</td>
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</table>

**SWCAA 08-2799R1** 1/21/2010
IV. PERMIT PROVISIONS

P1. Credible Evidence

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

P2. Confidentiality of Records and Information

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

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

Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permittee or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70.94.205.

P3. Permit Duration

This permit shall be valid for a fixed term of 5 years from the date of issuance.


(a) Duty to comply. The permittee must comply with all conditions of this Chapter 401 permit. Any permit noncompliance constitutes a violation of Revised Code of Washington (RCW) Chapter 70.94 and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
(b) **Need to halt or reduce activity not a defense.** It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) **Permit actions.** This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

(d) **Property rights.** This permit does not convey any property rights of any sort, or any exclusive privilege.

(e) **Duty to provide information.** The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permittee or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70.94.205.

(f) **Permit fees.** The permittee shall pay fees in accordance with RCW 70.94.162 as a condition of this permit in accordance with the permitting authority's fee schedule. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in RCW 70.94.430 and 70.94.431.

(g) **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 herein shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect until the renewal permit has been issued or denied if a timely and complete application has been submitted.
P5. Insignificant Emission Unit - Permit Revision

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 emissions thresholds specified in WAC 173-401-530(4) until this permit is modified pursuant to WAC 173-401-725.

P6. Federally Enforceable Requirements

(a) All terms and conditions in an air operating permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the FCAA, except as indicated in paragraph (b) below.

(b) 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.

P7. Permit Shield

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

(a) The provisions of section 303 of the FCAA (emergency orders), including the authority of the Administrator under that section;

(b) The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

(c) The applicable requirements of the acid rain program, consistent with section 408(a) of the FCAA;

(d) The ability of EPA to obtain information from a source pursuant to section 114 of the FCAA; and

(e) The ability of the permitting authority to establish or revise requirements for the use of reasonably available control technology (RACT) as defined in RCW 70.94.

P8. Emergency Provision

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

(a) An emergency occurred and that the permittee can identify the causes(s) of the emergency;
(b) The permitted facility was at the time being properly operated;

(c) During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(d) The permittee submitted notice of the emergency to the permitting authority within two working days of the time when emission limitations were exceeded due to the emergency or shorter periods of time specified in an applicable requirement. This notice fulfills the requirement of WAC 173-401-615(3)(b) unless the excess emissions represent a potential threat to human health and safety. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

Burden of proof lies with the permittee.

P9. Reopenings for Cause

WAC 173-401-730

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

(a) Additional applicable requirements become applicable to a major air operating permit source with a remaining permit term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j);

(b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit;

(c) The permitting authority or Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or

(d) The Administrator or the permitting authority determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings under this section shall not be initiated before a notice of such intent is provided to the 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.

P10. Excess Emissions

SWCA 400-107

The permittee shall report excess emissions to SWCAA as soon as possible. Excess emissions due to startup or shutdown conditions or due to scheduled maintenance shall be considered
unavoidable provided the source reports as required under subsection (1) of SWCAA 400-107 and adequately demonstrates that the excess emissions could not have been prevented or avoided.

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

(a) The event was not caused by poor or inadequate design, operation, or maintenance, or any other reasonably preventable conditions;

(b) The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance;

(c) The operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded; and

(d) The owner or operator(s) actions in response to the excess emissions were documented by properly signed, contemporaneous operating logs, or other relevant evidence.

V. GENERAL TERMS AND CONDITIONS

G1. Asbestos

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

G2. Chemical Accident Prevention Program

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

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

(b) The date on which a regulated substance is first present above a threshold quantity in a process.

G3. Protection of Stratospheric Ozone

The permittee shall comply with the standards for recycling and emissions reduction as provided in 40 CFR Part 82, Subparts B and F.
G4. **Duty to Supplement or Correct Application**

WAC 173-401-500(6)

The permittee, upon becoming aware that relevant facts were omitted or incorrect information was submitted in a permit application, shall promptly submit such supplementary facts or corrected information. In addition, 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.

G5. **Certification**

WAC 173-401-520

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

G6. **Inspection and Entry**

WAC 173-401-630(2)

SWCAA 400-105(3)

SWCAA 400-106(1)(a)

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

(a) Enter upon the permittee's premises where an air operating permit source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

(d) As authorized by SWCAA 400-105 and the FCAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

G7. **Schedule of Compliance**

WAC 173-401-630(3)

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

G8. **Permit Renewal, Expiration and Revocation**

WAC 173-401-710

The permittee shall submit a complete permit renewal application to SWCAA no later than the date established in the permit. Permit expiration terminates the source's right to operate unless a
timely and complete renewal application has been submitted consistent with WAC 173-401-710(1) and WAC 173-401-500. All terms and conditions of the permit shall remain in effect after the permit expires if a timely and complete permit application has been submitted. Operation under the terms and conditions of the expired permit will be allowed until SWCAA takes final action on the renewal application.

This permit expires on **June 23, 2015**. A renewal application is due on **June 23, 2014** and a complete renewal application is due no later than **December 23, 2014**.

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

### G9. Transfer of Ownership or Operational Control

WAC 173-401-720(1)(d)

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

### G10. Portable Sources

WAC 173-110(5)

SWCAA 400-110(5)

SWCAA 400-110(6)

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

(a) The source/emission units are registered with SWCAA;

(b) The source/emission units have an air discharge permit 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 emissions 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.

G11. Misrepresentation and Tampering

(a) The permittee shall not make any false material statement, representation or certification in any form, notice, or report.

(b) The permittee shall not render inaccurate any monitoring device or method required under Chapter 70.94 RCW, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto.

G12. New Source Review

The permittee shall not construct or modify a source which is required to be reviewed under SWCAA 400 and 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 G10 – Portable Sources.

G13. Replacement or Substantial Alteration of Emission Control Technology at an Existing Stationary Source

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

G14. Outdoor Burning

The permittee is prohibited from conducting outdoor burning except as allowed by SWCAA 425.
VI. OPERATING TERMS AND CONDITIONS

The following table lists all federal, state, and/or locally enforceable requirements applicable to the permittee. The legal authority for each requirement is below each requirement. Applicable requirements identified as having "plantwide" applicability apply to both EUs and IEUs. Some of the requirements have been partially adopted into the Washington State Implementation Plan (SIP). Only those parts adopted into the Washington SIP are federally enforceable. Requirements which are not required under the FCAA are denoted as state or local only. Monitoring requirements are used to provide a reasonable assurance of compliance with the applicable requirements, and may or may not involve the use of a reference test method.

<table>
<thead>
<tr>
<th>Req. #</th>
<th>Requirement</th>
<th>Emission Point</th>
<th>Monitoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>Req-1</td>
<td>Permittee shall not cause or permit any visible emissions which exceed 20% opacity for more than three minutes, in any one hour. Reference Test Method: SWCAA 400, Appendix A – SWCAA Method 9</td>
<td>Plantwide</td>
<td>M1</td>
</tr>
<tr>
<td></td>
<td>SWCAA 400-040(1)(a)&amp;(b)</td>
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</tr>
<tr>
<td>Req-2</td>
<td>Permittee shall not cause or permit fallout of particulate matter beyond the source's property boundary in sufficient quantity to interfere unreasonably with the use and enjoyment of the property on which the fallout occurs.</td>
<td>Plantwide</td>
<td>M2, M4</td>
</tr>
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<td></td>
<td>SWCAA 400-040(2)</td>
<td></td>
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</tr>
<tr>
<td>Req-3</td>
<td>Permittee shall take reasonable precautions to prevent the release of fugitive emissions from any emission unit which is a source of fugitive emissions.</td>
<td>Plantwide</td>
<td>M3, M4</td>
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<td>SWCAA 400-040(3)(a)</td>
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<tr>
<td>Req-4</td>
<td>Permittee shall use recognized good practice and procedures to reduce odors to a reasonable minimum.</td>
<td>Plantwide</td>
<td>M4</td>
</tr>
<tr>
<td></td>
<td>SWCAA 400-040(4)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Req-5</td>
<td>Permittee shall not cause or permit emissions detrimental to persons or property.</td>
<td>Plantwide</td>
<td>M4</td>
</tr>
<tr>
<td></td>
<td>SWCAA 400-040(5)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Req-6</td>
<td>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. Reference Test Method: 40 CFR 60, Appendix A - EPA Method 6</td>
<td>Plantwide</td>
<td>M6</td>
</tr>
<tr>
<td></td>
<td>SWCAA 400-040(6)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Except the second paragraph of SWCAA 400-040(6)(a)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Req-7</td>
<td>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.</td>
<td>Plantwide</td>
<td>M5</td>
</tr>
<tr>
<td></td>
<td>SWCAA 400-040(7)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Req</td>
<td>Requirement</td>
<td>Emission Limit</td>
<td>Plant Area</td>
</tr>
<tr>
<td>-----</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>8</td>
<td>Permittee shall take reasonable precautions to prevent emissions of fugitive dust and operate the source to minimize emissions.</td>
<td>SWCAA 400-040(8)(a)</td>
<td>Plantwide</td>
</tr>
<tr>
<td>9</td>
<td>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. Reference Test Method: 40 CFR 60, Appendix A - EPA Method 5 SWCAA 400-050(1)&amp;(3) Oxygen level exclusion provision of SWCAA 400-050(3)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Permittee shall not cause or allow emissions of particulate matter from a general process unit (excludes combustion) in excess of 0.1 gr/dscf of exhaust gas. Reference Test Method: 40 CFR 60, Appendix A - EPA Method 5 SWCAA 400-060</td>
<td></td>
<td>Plantwide</td>
</tr>
<tr>
<td>11</td>
<td>Emissions from the Nebraska hog fuel boiler shall not exceed the following corrected to 7% O₂:</td>
<td>Pollutant</td>
<td>EU3</td>
</tr>
<tr>
<td></td>
<td>NOₓ</td>
<td>58.52 tpy, 90 ppmvd, 24-hour average</td>
<td></td>
</tr>
<tr>
<td></td>
<td>CO</td>
<td>105.35 tpy, 228 ppmvd, 24-hour average</td>
<td></td>
</tr>
<tr>
<td></td>
<td>PM/PM₁₀</td>
<td>14.30 tpy, 0.015 gr/dscf, 1-hr average (filterable only)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Ammonia</td>
<td>5.81 tpy, 25 ppm, 24-hour average</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Acetaldehyde</td>
<td>0.06 tpy</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Acrolein</td>
<td>0.012 tpy</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Formaldehyde</td>
<td>0.67 tpy</td>
<td></td>
</tr>
<tr>
<td></td>
<td>The short-term emission limits identified above (hourly or 24-hr averaging time) shall not apply during boiler start up and shutdown periods and periods of soot blowing/grate cleaning.</td>
<td>SWCAA 08-2799R1, Section 2.1.1</td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Emissions from dry kiln operations shall not exceed the following:</td>
<td>Pollutant</td>
<td>EU4</td>
</tr>
<tr>
<td></td>
<td>VOC</td>
<td>85.00 tpy</td>
<td></td>
</tr>
<tr>
<td></td>
<td>PM/PM₁₀</td>
<td>4.65 tpy</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Acetaldehyde</td>
<td>10.50 tpy</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Acrolein</td>
<td>0.18 tpy</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Formaldehyde</td>
<td>0.19 tpy</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Methanol</td>
<td>7.00 tpy</td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>Emissions from the anti-stain application shall not exceed the following:</td>
<td>Pollutant</td>
<td>EU5</td>
</tr>
<tr>
<td></td>
<td>VOC</td>
<td>1.70 tpy</td>
<td></td>
</tr>
<tr>
<td></td>
<td>SWCAA 08-2799R1, Section 2.1.3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Req-14</td>
<td>Emissions from the Carothers and Son baghouse shall not exceed the following:</td>
<td>EU2</td>
<td>M2, M9, M11</td>
</tr>
<tr>
<td>-------</td>
<td>--------------------------------------------------------------------------------</td>
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<td>-------------</td>
</tr>
<tr>
<td></td>
<td><strong>Pollutant</strong></td>
<td><strong>Emission Limit</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>PM/PM$_{10}$</td>
<td>11.26 tpy, 0.005 gr/dscf, 1-hr average</td>
<td></td>
</tr>
<tr>
<td></td>
<td>SWCAA 08-2799R1, Section 2.1.4</td>
<td></td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Req-15</th>
<th>Emissions from bin unloading shall not exceed the following:</th>
<th>EU2</th>
<th>M2, M9</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>Pollutant</strong></td>
<td><strong>Emission Limit</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>PM</td>
<td>37.44 tpy</td>
<td></td>
</tr>
<tr>
<td></td>
<td>PM$_{10}$</td>
<td>22.46 tpy</td>
<td></td>
</tr>
<tr>
<td></td>
<td>SWCAA 08-2799R1, Section 2.1.5</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Req-16</th>
<th>Permittee shall not cause or permit any visible emissions from operation of the Nebraska hog fuel boiler which exceeds ten percent (10%) opacity for more than 3 minutes in any one hour period except during periods of cold-start ups, soot blowing and/or grate cleaning. Reference Test Method: SWCAA 400, Appendix A – SWCAA Method 9</th>
<th>EU3</th>
<th>M1</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>SWCAA 08-2799R1, Section 2.1.6</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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<thead>
<tr>
<th>Req-17</th>
<th>Permittee shall not cause or permit any visible emissions from operation of the dry kilns which exceeds five percent (5%) opacity for more than 3 minutes in any one hour period. Reference Test Method: SWCAA 400, Appendix A – SWCAA Method 9</th>
<th>EU4</th>
<th>M1</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>SWCAA 08-2799R1, Section 2.1.6</td>
<td></td>
<td></td>
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</tbody>
</table>

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<thead>
<tr>
<th>Req-18</th>
<th>Permittee shall not cause or permit any visible emission from approved operations which exceeds zero percent (0%) opacity for more than three minutes in any one hour. Reference Test Method: SWCAA 400, Appendix A – SWCAA Method 9</th>
<th>EU2</th>
<th>M1</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>SWCAA 08-2799R1, Section 2.1.6</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Req-19</th>
<th>Operations that cause or contribute to a nuisance odor shall use recognized good practice and procedures to reduce these odors to a reasonable minimum.</th>
<th>Plantwide</th>
<th>M4</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>SWCAA 08-2799R1, Section 2.2.8</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Req-20</th>
<th>Each pollution control device shall be operated whenever the processing equipment served by that control device is in operation with the exception of the ESP and SNCR during hog fuel boiler start-ups. Control devices shall be operated and maintained in accordance with the manufacturer's specifications. Furthermore, control devices shall be operated in a manner that minimizes emissions. The Carothers and Son baghouse shall be operated at all times when the planer is in use.</th>
<th>EU2, EU3</th>
<th>M2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>SWCAA 08-2799R1, Section 2.2.9, 15</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Req-21</th>
<th>Exhaust gases from approved equipment shall be discharged vertically. Any device that obstructs or prevents vertical discharge while in operation is prohibited.</th>
<th>EU2, EU3, EU4</th>
<th>M3</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>SWCAA 08-2799R1, Section 2.2.11</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Req-22</th>
<th>The Carothers and Son baghouse shall be equipped with a differential pressure gauge to continuously measure the pressure differential (ΔP) across the filtering media.</th>
<th>EU2</th>
<th>M5, M9</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>SWCAA 08-2799R1, Section 2.2.14</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Req-23</td>
<td>The Nebraska hog fuel boiler shall only be fired on wood products. The Permittee shall employ work practices to assure only clean fuel is combusted in the hog fuel boiler.</td>
<td>EU3</td>
<td>M5, M6</td>
</tr>
<tr>
<td>Req-24</td>
<td>A flow meter to record ammonia consumption shall be installed and maintained to monitor the ammonia usage of the SNCR system.</td>
<td>EU3</td>
<td>M5, M7</td>
</tr>
<tr>
<td>Req-25</td>
<td>The dry-bulb set point temperature of the dry kilns shall not exceed 180°F.</td>
<td>EU4</td>
<td>M8</td>
</tr>
<tr>
<td>Req-26</td>
<td>Dry kiln doors shall be kept closed at all times during active drying operations.</td>
<td>EU4</td>
<td>M3</td>
</tr>
<tr>
<td>Req-27</td>
<td>Approved lumber drying operations shall only dry Douglas fir, pine, hemlock, and spruce lumber. Lumber made from other wood species may be dried upon written approval by SWCAA. When requesting approval, the permittee must provide the following information to SWCAA: (a) Identification of the wood species to be dried; (b) Emission factors for the specified wood species; and (c) Expected quantity of lumber of that species to be dried.</td>
<td>EU4</td>
<td>M8</td>
</tr>
<tr>
<td>Req-28</td>
<td>Wood waste loadout bins shall have full length side wind barriers as well as shrouding/curtains on the end to reduce fugitive particulate emissions.</td>
<td>EU2</td>
<td>M5, M9</td>
</tr>
<tr>
<td>Req-29</td>
<td>All VOC containing materials shall be collected in an enclosed container and not allowed to evaporate.</td>
<td>EU4</td>
<td>M10</td>
</tr>
<tr>
<td>Req-30</td>
<td>The use of a street sweeper (or similar device such as a water truck) on paved roads shall be used weekly when significant rainfall has not occurred, or more frequently as needed to prevent fugitive dust and to keep the log yard clean.</td>
<td>EU1</td>
<td>M3</td>
</tr>
</tbody>
</table>
VII. MONITORING TERMS AND CONDITIONS

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. Visible Emissions Monitoring

This monitoring requirement applies to Requirements 1, 16, 17 and 18.

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 whether the equipment involved is experiencing a malfunction and determine if all pollution control equipment is operating properly. If the equipment has an opacity limit higher than 0%, assure the equipment is operating within permitted limits. Within 24 hours of initial discovery, permittee shall resolve the visible emissions or excess emissions problem, or notify SWCAA by the next working day of progress made in resolving the operational problem. 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

This monitoring requirement applies to Requirements 2, 9, 10, 14, 15, and 20.

The permittee shall perform monthly inspections of affected operations during daylight hours for the purpose of identifying potential particulate matter emissions violations. Whenever particulate matter fallout or visible emissions are observed during the monthly inspection, other than from the hog fuel boiler, the permittee shall verify the equipment causing the emissions. The permittee shall within 60 minutes of observing the emissions confirm whether the equipment involved is experiencing a malfunction and whether all air pollution control equipment is operating properly. The permittee shall resolve particulate matter fallout or visible emissions within 24 hours of initial discovery, or notify SWCAA by the next business day of the progress made in resolving the problem. 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.

M3. Fugitive Emissions Monitoring

This monitoring requirement applies to Requirements 3, 8, 21, 26, and 30.
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 determine the source of the emissions and perform a visible emission evaluation. The permittee shall within 60 minutes of discovery confirm whether the equipment involved is experiencing a malfunction, and whether 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) The use of a street sweeper (or similar device such as a water truck) on paved roads shall be used weekly when significant rainfall has not occurred, or more frequently as needed to prevent fugitive dust and to keep the log yard clean;
(b) Exhaust gas from approved equipment shall be discharged vertically into the ambient air. Any device that obstructs or prevents vertical discharge while in operation is prohibited; and.
(c) Dry kiln doors shall be kept closed at all times during active drying operations.

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

M4. Complaint Monitoring

This monitoring requirement applies to Requirements 2, 3, 4, 5, 8, and 19.

The permittee shall record, and maintain record of, any air quality related complaints received by the permittee or received by SWCAA and provided to the permittee. All complaints shall be investigated no later than one work day after the permittee has been notified. Investigation shall determine 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

This monitoring requirement applies to Requirements 7, 22, 23, 24, and 28.

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) Only clean fuel is combusted in the Nebraska hog fuel boiler;
(c) Equipment capable of monitoring the following parameters on a continuous basis is installed and maintained:
   (i) A continuous emission monitoring system (CEMS) and data acquisition and handling system (DAHS) shall be installed to monitor emission concentrations and emission rates of opacity, NO\textsubscript{X}, CO, and O\textsubscript{2} from the Nebraska hog fuel boiler;
(ii) Dry kiln operating temperature for all kilns; and
(iii) Steam production and excess oxygen of Nebraska hog fuel boiler.

(d) A flow meter to record ammonia consumption shall be installed and maintained to monitor the ammonia usage of the SNCR system;
(e) A differential pressure gauge which indicates the pressure differential across the filtering media of the Carothers and Son baghouse is installed and maintained; and
(f) Wood waste loadout bins shall have full length side wind barriers as well as shrouding/curtains on the ends to reduce fugitive particulate matter emissions.

M6. **SO₂ Emission Standard**

WAC 173-401-615(1)

SWCAA 08-2799R1 Section 2.2.12

This monitoring requirement applies to Requirements 6 and 23.

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

M7. **Hog Fuel Boiler Operations Monitoring**

SWCAA 08-2799R1 Section 2.3.27

This monitoring requirement applies to Requirements 11 and 24.

The permittee shall monitor ESP, SNCR, and boiler operations as follows:

(a) Multiclone differential pressure recorded daily
(b) Secondary voltage in each ESP field recorded daily
(c) Current level in each ESP field recorded daily
(d) Spark rate in each ESP field recorded daily
(e) Ammonia consumption (lb/month) recorded monthly
(f) Hours of operation recorded monthly
(g) Boiler/ESP outlet temperature recorded daily
(h) Boiler steam flow rate recorded continuously
(i) Maintenance and repair activities recorded for each occurrence
(j) Emission testing/monitoring results recorded for each occurrence
(k) Oxygen level in boiler exhaust recorded continuously
(l) Periods of grate cleaning/soot blowing recorded for each occurrence
(m) CEMS calibration results recorded for each occurrence
(n) CEMS cylinder gas audit results recorded for each occurrence
(o) CEMS maintenance/repair activities recorded for each occurrence

The permittee shall perform daily inspections of affected operations to confirm that equipment operating parameters are in compliance with applicable requirements. Whenever noncompliant conditions are observed during the daily inspection or at any other time, the permittee shall within 60 minutes of discovery confirm whether the equipment involved is experiencing a malfunction, and if all air pollution control equipment is operating properly. Within 24 hours of initial discovery, permittee shall resolve the operational deficiency, or notify SWCAA by the next business day of progress.
made in resolving the operating problem. 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.

**M8. Monitoring and Emissions from Lumber Drying**

SWCAA 08-2799R1 Section 2.3.28

This monitoring requirement applies to Requirements 12, 25, and 27.

The permittee shall monitor and record lumber drying operations as follows:

(a) Amount, species, and final moisture of dried lumber recorded monthly
(b) Emission testing results recorded for each occurrence
(c) Dry kiln temperature monitored continuously during operation

The permittee shall record, and maintain record of, the species, quantity, and moisture content of lumber dried in the facilities' dry kilns on a monthly basis. The highest temperature of the dry kiln exhaust air shall be recorded on a daily basis. Periods of non-operation should be recorded as such. 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 the respective Permits. Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

**M9. Material Handling Operations Monitoring**

WAC 173-401-615(1)

SWCAA 08-2799R1 Section 2.3.29, 31

This monitoring requirement applies to Requirements 14, 15, 22 and 28.

The permittee shall record monthly bone dry tons and type of wood waste unloaded from bins.

The permittee shall monitor and record the Carothers and Son baghouse operations as follows:

(a) Differential pressure recorded weekly
(b) Hours of operation recorded monthly
(c) Filter bag replacement recorded for each occurrence
(d) Emission testing results recorded for each occurrence
(e) Maintenance and repair activities recorded for each occurrence

The permittee shall perform monthly inspections of affected operations 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 whether the equipment involved is experiencing a malfunction and whether air pollution control
equipment is operating properly. Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

**M10. Anti-Stain Monitoring**

This monitoring requirement applies to Requirements 13 and 29.

The permittee shall record monthly the amount and type of anti-stain product consumed.

For each new material which will result in emissions of toxic air pollutants as defined in WAC 173-460 [effective 8/98] or hazardous air pollutants, SWCAA shall be notified at least seven days in advance of the use.

The written notice shall include the following:

(a) A description of the proposed change(s) in materials with an MSDS for each new material;
(b) The date the change(s) is (are) to be made;
(c) The change(s) in emissions of VOCs, HAPs and TAPs 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).

**M11. Particulate Matter Emissions Testing**

This monitoring requirement applies to Requirements 10 and 14.

The permittee shall emission test the Carothers and Son baghouse every ten years, no later than the end of December 2016.

Emission testing shall be conducted as specified in Appendix D. Records of test results shall be maintained in accordance with Section VIII of this permit.

**M12. Lumber Drying Emissions Testing**

This monitoring requirement applies to Requirement 12.

The permittee shall emission test lumber drying within one year after achieving maximum intended operation. The kilns began operation on September 15, 2008. Subsequent emission testing shall be conducted on a five year cycle, no later than the end of the calendar month in which the initial emission test was performed.

Emission testing shall be conducted as specified in Appendix C. Records of test results shall be maintained in accordance with Section VIII of this permit.
M13. Boiler Emissions Testing

This monitoring requirement applies to Requirements 9 and 11.

The permittee shall emission test the Nebraska hog fuel boiler every two years, no later than the end of the calendar month in which the initial emission test was performed, which was on April 9, 2008. Annual Relative Accuracy Test Audits (RATA) shall be performed no later than the end of the month of the initial emission test.

Emission testing shall be conducted as specified in Appendix A and B. Records of test results shall be maintained in accordance with Section VIII of this permit.

M14. Boiler Continuous Emission Monitoring

This monitoring requirement applies to Requirement 11.

A CEMS shall be installed on the Nebraska hog fuel boiler exhaust stack to monitor NOX, CO, and O2 emissions as follows:

(a) The permittee shall install and maintain a system for monitoring the concentration and emission rate of CO, NOX, and O2 from the Nebraska hog fuel boiler exhaust stack in accordance with the requirements and specifications found in the following regulations:
   - 40 CFR 60, Appendix F "Quality Assurance Procedures."

(b) Hourly and 24-hour averages of the following data for the Nebraska hog fuel boiler shall be recorded by the DAHS and kept readily available for on-site inspection:
   - NOX emission concentration (ppmv @ 7% O2)
   - NOX emission rate (lb/hr)
   - CO emission concentration (ppmv @ 7% O2)
   - CO emission rate (lb/hr)
   - O2 concentration (dry volume percent)

Records of monitoring activities shall be maintained in accordance with Section VIII K2 of this permit. Relative accuracy test audit reports shall be reported to SWCAA as described in Section IX R6 of this permit.
VIII. RECORDKEEPING TERMS AND CONDITIONS

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 M14 as follows if applicable:

K1. General Recordkeeping

Permittee is required to keep the following records:

(a) Inspections and 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 when action was initiated.

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

(c) Upset Conditions/Excess Emissions
   (i) The date and time of upset or excess emission;
   (ii) Identification of the emissions unit involved;
   (iii) A brief description of the event;
   (iv) Duration of the event; and
   (v) Anticipated corrective action to prevent or minimize excess emissions.

(d) Sampling and Emissions Testing
   (i) The date sampling was performed;
   (ii) The entity that performed the sampling;
   (iii) The analytical techniques used to take the sample or perform the observation;
   (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 to perform the analyses;
   (viii) The results of such analyses;
   (ix) Compliance status of each monitored requirement; and
(x) Corrective action taken in response to permit deviations and when such action was initiated.

K2. Continuous Emission Data Recordkeeping WAC 173-401-615(2)
SWCAA 08-2799R1, Requirement 2.3.25-27

The permittee shall record and maintain for emission unit EU-3 a file of all measurements, data, reports, and other information required by this permit at the source in a readily accessible form suitable for inspection for at least five (5) years from the date of each record.

A continuous emission monitoring system (CEMS) and data acquisition and handling system (DAHS) shall be installed to monitor emission concentrations and emission rates of opacity, NOX, CO, and O2 from the Nebraska hog fuel boiler. The CEMS/DAHS system shall be operated and maintained as described in Appendix B. Minimum data availability shall be 90% or greater.

CEM calibration results, cylinder gas audits results and maintenance and repair activities shall be recorded for each occurrence.

Hourly and 24-hour averages of the following data for the Nebraska hog fuel boiler shall be recorded by the DAHS and kept readily available for on-site inspection:
(a) NOX emission concentration (ppmvd @ 7% O2)
(b) NOX emission rate (lb/hr)
(c) CO emission concentration (ppmvd @ 7% O2)
(d) CO emission rate (lb/hr)
(e) O2 concentration (dry volume percent)

IX. REPORTING TERMS AND CONDITIONS

All required reports must be certified by a responsible official consistent with WAC 173-401-520. Where an applicable requirement requires reporting more frequently than once every six months, the responsible official's certification need only be submitted once every six months, covering all required reporting since the date of the last certification.

Addresses of regulatory agencies are the following, unless otherwise instructed:

Southwest Clean Air Agency U.S. EPA Region X
11815 NE 99 St., Ste 1294 Air Operating Permits
Vancouver, WA 98682 1200 Sixth Avenue, AWT-107
Seattle, WA 98101
R1. Deviations from Permit Conditions  

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

(a) Identification of the emission unit(s) involved;
(b) The duration of the event including the beginning and end times; and
(c) A brief description of the event, including:
   (i) Whether or not the deviation was due to an upset condition;
   (ii) The probable cause of the deviations; and
   (iii) The corrective action taken and when the corrective action was initiated.

Excess emissions shall be reported as soon as possible. In accordance with SWCAA 400-107(1), excess emissions that the permittee wishes to be considered unavoidable must be reported as soon as possible, but no later than 48 hours after discovery. The permittee shall report the upset condition by telephone, e-mail or facsimile as initial notification to SWCAA; a message may be left on the answering machine for conditions outside of normal business hours.

R2. Complaint Reports

The permittee shall report all complaints to SWCAA within three business 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

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

(a) Records of all required monitoring, and any deviation from permit requirements shall be clearly identified;
(b) For all EPA Method 9 or SWCAA Method 9 monitoring conducted during the semi-annual period, a copy of the relevant opacity certification(s) shall be submitted with the semi-annual report;
(c) Hours of operation of the Nebraska hog fuel boiler;
(d) Cold start-up periods for the Nebraska hog fuel boiler;
(e) Amount of ammonia consumed;
(f) Amount, species, average temperature set point and average final moisture of lumber dried in the dry kilns;
(g) Hours of operation for the Carothers and Son baghouse;
(h) Amount and type of anti-stain consumed;
(i) Amount and type of wood byproducts transferred from the facility;
(j) Hourly and daily (24-hr) CEMS data for:
   (i) \( \text{NO}_X \) emission concentration (ppmvd @ 7% \( O_2 \))
   (ii) \( \text{NO}_X \) emission rate (lb/hr)
   (iii) \( \text{CO} \) emission concentration (ppmvd @ 7% \( O_2 \))
   (iv) \( \text{CO} \) emission rate (lb/hr)
   (v) \( O_2 \) concentration (% \( O_2 \))

(k) Opacity exceedance reports;

(l) The results of all daily CEMS calibrations and quarterly cylinder gas audits;

(m) Certification that all required equipment is installed;

(n) Certification that only clean, wood products are combusted in the Nebraska hog fuel boiler;

(o) Summary of facilitywide air pollutant emissions; and

(p) All required reports must be certified by a responsible official consistent with WAC 173-401-520. The responsible official is identified on Page 1 of the Statement of Basis. The reports shall be either certified at initial submittal or each shall be delineated and certified in the subsequent semi-annual report.

R4. Annual Reports

(a) Annual Compliance Certification:
The permittee shall submit to SWCAA and EPA a certification of compliance with all terms and conditions of this permit in accordance with WAC 173-401-630(5)(d). The permittee shall submit by March 15th of the following year the following information for the period of January through December:
   (i) Identification of each term or condition of the permit that is the basis of the certification;
   (ii) Statement of compliance status;
   (iii) Whether compliance was continuous or intermittent;
   (iv) Method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with WAC 173-401-615;
   (v) Such other facts as SWCAA may require to determine the compliance status of the source; and
   (vi) Such additional requirements as may be specified pursuant to Sections 114(a)(3) and 504(b) of the FCAA.

(b) Annual Reports:
The permittee shall report the following to SWCAA annually by December 31st:
   (i) The annual grate cleaning schedule for the Nebraska hog fuel boiler for the upcoming year.

R5. Emission Inventory Reports

The permittee shall submit an inventory of annual emissions from the source each calendar year to SWCAA by March 15th of the following year in accordance with SWCAA 400-105.
The inventory shall include stack and fugitive emissions of NO\textsubscript{X}, SO\textsubscript{2}, CO, VOC, PM, and toxic air pollutants identified in WAC 173-460 [effective 8/21/1998].

**R6. Source Test and RATA Reports**

WAC 173-401-615(3)

SWCAA 400-106

SWCAA 08-2799R1 Section 2.5.43, Appendices A, B, C, D

(a) Source Test Reports of all required source or emissions testing shall be submitted to the Agency within 45 days of test completion. Each report shall include:

(i) A description of the source including manufacturer, model number and design capacity of the equipment, and the location of the sample ports or test locations.

(ii) Time and date of the test and identification and qualifications of the personnel involved.

(iii) A summary of results, reported in units and averaging periods consistent with the applicable emission standard or limit with correction to the appropriate O\textsubscript{2} standard.

(iv) A summary of control system or equipment operating conditions.

(v) A summary of production related parameters.

(vi) A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation.

(vii) A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation.

(viii) Copies of field data and example calculations.

(ix) Chain of custody information.

(x) Calibration documentation.

(xi) Discussion of any abnormalities associated with the results.

(xii) A statement signed by the senior management official of the testing firm certifying the validity of the source test report.

(xiii) An electronic copy of the test report shall be provided to SWCAA.

(b) Relative accuracy test audit reports shall be submitted to SWCAA within 45 days of test completion. An electronic copy of the test/RATA report shall be provided to SWCAA.

**R7. Monthly Records**

SWCAA 08-2799R1 Section 2.5.37

The permittee shall submit monthly the 12-month rolling total in tons for NO\textsubscript{X} and CO from the Nebraska hog fuel boiler.

**R8. MACT Records – Plywood MACT (Subpart DDDD)**

40 CFR 63.46011

The permittee shall submit an initial notification of applicability as required by 40 CFR 63.9. This notification was submitted March 19, 2008.
X. NON-APPLICABLE REQUIREMENTS

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

1. **Standards of Performance for Incinerators (Subpart E)**

   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 40 CFR 60.51(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 hog 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 requirement is not applicable.

2. **Emission Standards for Combustion and Incineration Units**

   SWCAA 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 SWCAA 400-030(34), an incinerator is defined as "...a furnace used primarily for the thermal destruction of waste." The primary purpose of the hog fuel boiler at this source is the production of process steam not the destruction of waste so this requirement is not applicable.

3. **Registration Program**

   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).

4. **Solid Waste Incinerator Facilities**

   WAC 173-434 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 hog fuel boiler is not included in the definition of solid waste. Therefore, this requirement is not applicable.
5. Compliance Assurance Monitoring

40 CFR Part 64 establishes criteria that define what monitoring should be conducted by a source owner or operator to provide a reasonable assurance there is compliance with emission limits and standards in order to certify compliance under the Title V operating permit program. Since the hog fuel boiler, EU-3, has a continuous compliance determination method for CO (i.e., a CO CEM), the permittee is exempt from Part 64 requirements pursuant to 40 CFR 64.2(b)(1)(iii) and 64.2(b)(1)(vi).
Appendix A

Emission Testing Requirements
Nebraska Boiler

1. Introduction:

The purpose of this testing is to quantify emissions from the Nebraska hog fuel boiler, and demonstrate compliance with the requirements of this Permit and applicable air quality regulations.

2. Testing Requirements:

a. Test plan. A comprehensive test plan shall be submitted to SWCAA for review and approval at least ten business days prior to each test. SWCAA personnel shall be informed at least five business days prior to testing so that a representative may be present during testing.

b. Testing schedule. Initial testing was completed on April 9, 2008. Emission testing shall be conducted every two years, no later than the end of April.

c. Test runs/Reference test methods. A minimum of three test runs shall be performed for each constituent listed below to ensure the data are representative. Compliance shall be demonstrated by averaging the results of the individual sampling runs. The sampling methods and schedules shall be used unless alternate methods are approved in writing by SWCAA in advance of the emission testing.

<table>
<thead>
<tr>
<th>Constituent</th>
<th>Reference Test Method</th>
<th>Minimum Test Run Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flow rate, temperature</td>
<td>EPA Methods 1 and 2</td>
<td>N/A</td>
</tr>
<tr>
<td>O₂, CO₂ content</td>
<td>EPA Method 3 or 3A</td>
<td>60 minutes</td>
</tr>
<tr>
<td>Moisture content</td>
<td>EPA Method 4</td>
<td>60 minutes</td>
</tr>
<tr>
<td>PM (filterable)</td>
<td>EPA Method 5</td>
<td>60 minutes</td>
</tr>
<tr>
<td>PM (condensable)</td>
<td>EPA Method 202</td>
<td>60 minutes</td>
</tr>
<tr>
<td>NOₓ</td>
<td>EPA Method 7E</td>
<td>60 minutes</td>
</tr>
<tr>
<td>CO</td>
<td>EPA Method 10</td>
<td>60 minutes</td>
</tr>
<tr>
<td>Ammonia (NH₃)</td>
<td>BAAQMD ST-1B</td>
<td>30 minutes</td>
</tr>
<tr>
<td>VOC (initial test only)</td>
<td>EPA Method 25A</td>
<td>60 minutes</td>
</tr>
<tr>
<td>SO₂ (initial test only)</td>
<td>EPA Method 6C</td>
<td>60 minutes</td>
</tr>
<tr>
<td>Opacity</td>
<td>SWCAA Method 9</td>
<td>6 minutes</td>
</tr>
</tbody>
</table>

3. Source Operation:

a. Source operations. Source operations during the emission test must be representative of maximum intended operating conditions.
Appendix A
Emission Testing Requirements
Nebraska Boiler

b. **Record of production parameters.** Production related parameters and equipment operating conditions shall be recorded during emission testing for each run to correlate operating conditions with emissions. Recorded parameters shall, at a minimum, include:
   1) Boiler steam production rate (lb/hr steam),
   2) Boiler firing rate (MMBtu/hr),
   3) Ammonia injection rate (gal/hr),
   4) Fuel type/mixture description,
   5) Process start ups and shutdowns, and
   6) Plant adjustments.

   All recorded production parameters shall be documented in the test results report.

4. **Reporting Requirements:**

   a. A final emission test report shall be prepared and submitted to SWCAA within 45 calendar days of test completion and, at a minimum, shall contain the following information:

   (1) Description of the source including manufacturer, model number and design capacity of the equipment, the location of the sample ports or test locations, and stack parameters,
   (2) Time and date of the test and identification and qualifications of the personnel involved,
   (3) Summary of results, reported in units and averaging periods consistent with the applicable 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,
   (12) A statement signed by the senior management official of the testing firm certifying the validity of the source test report, and
   (13) An electronic copy of the test report shall be provided to SWCAA.

   b. All test results shall be corrected to 7% oxygen.
Appendix B
Continuous Emission Monitoring Requirements
Nebraska Boiler

1. Introduction:
   a. The purpose of installing and maintaining continuous emissions monitoring systems (CEMS) for NO\textsubscript{X}, O\textsubscript{2}, and CO is to demonstrate compliance with the requirements of this Air Discharge Permit.

2. Requirements:
   a. **CO, NO\textsubscript{X} and O\textsubscript{2} CEMS.** The permittee shall install and maintain a system for monitoring the concentration and emission rate of CO, NO\textsubscript{X}, and O\textsubscript{2} from the Nebraska hog fuel boiler exhaust stack in accordance with the requirements and specifications found in the following regulations:

   - 40 CFR 60, Appendix F "Quality Assurance Procedures."

   Relative Accuracy Test Audits (RATAs) shall be conducted at least once for every four calendar quarters.

   b. **RATA Reports.** Relative accuracy test audit reports shall be submitted to SWCAA within 45 days of test completion. An electronic copy of the test/RATA report shall be provided to SWCAA.
Appendix C

Emission Testing Requirements

Lumber Drying

1. **Introduction:**

The purpose of this testing is to quantify emissions from lumber drying operations described in this Permit.

2. **Testing Requirements:**

   a. **Testing schedule.** Emission testing of the lumber drying process shall be conducted within one year after achieving maximum intended operation. The kilns began operation on September 15, 2008. Subsequent emission testing shall be conducted on a five year cycle, no later than the end of the calendar month in which the initial emission test was performed. Unless otherwise directed by SWCAA, the testing shall be conducted on the dominant species dried at the facility.

   b. **Test plan.** A comprehensive test plan shall be submitted to SWCAA for review and approval at least ten business days prior to each test. SWCAA personnel shall be informed at least five business days prior to testing so that a representative may be present during testing.

   c. **Test runs/Reference test methods.** The sampling methods identified below shall be used unless alternate methods are approved in writing by SWCAA in advance of the emission testing.

<table>
<thead>
<tr>
<th>Constituent</th>
<th>Reference Test Method</th>
<th>Minimum Test 1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exhaust Flow</td>
<td>EPA Methods 1-4</td>
<td>N/A</td>
</tr>
<tr>
<td>Volatile organic compounds 2</td>
<td>EPA Method 25A / 18 or 320</td>
<td>N/A</td>
</tr>
<tr>
<td>Methanol</td>
<td>NCASI Method 105</td>
<td>N/A</td>
</tr>
<tr>
<td>Ethanol</td>
<td>NCASI Method 105</td>
<td>N/A</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>NCASI Method 105</td>
<td>N/A</td>
</tr>
<tr>
<td>Acetaldehyde</td>
<td>NCASI Method 105</td>
<td>N/A</td>
</tr>
<tr>
<td>Acrolein</td>
<td>NCASI Method 105</td>
<td>N/A</td>
</tr>
<tr>
<td>Propionaldehyde</td>
<td>NCASI Method 105</td>
<td>N/A</td>
</tr>
<tr>
<td>Acetic Acid</td>
<td>NCASI Method 105^3</td>
<td>N/A</td>
</tr>
<tr>
<td>Mono Turpenes</td>
<td>EPA Method 18</td>
<td>N/A</td>
</tr>
</tbody>
</table>

^1 Test duration will be as necessary to yield representative results. In some cases, multiple test runs will be conducted over the drying cycle.

^2 The purpose of the testing is to quantify actual VOC emissions. This might involve developing an appropriate scaling factor for Method 25A results, or quantifying the individual components of the kiln exhaust without performing Method 25A.

^3 Acetic acid may be collected in the NCASI Method 105 impinger train and analyzed by HPLC.
Appendix C

Emission Testing Requirements

Lumber Drying

3. Kiln Operation:

a. **Quality assurance.** The following quality assurance measures shall be met unless otherwise approved by SWCAA in advance of the testing:
   
   (1) The lumber used for the source test shall be preserved in a manner to assure the freshness of the lumber. The lumber shall be wrapped in plastic wrap or some other material to prevent off-gassing and contamination during storage and shipment;
   
   (2) The log(s) from which lumber is taken should be newly arrived to the lumber yard;
   
   (3) The lumber shall be maintained below 45°F if the lumber is stored for more than two but less than seven days prior to the commencement of testing;
   
   (4) The lumber shall be maintained below 10°F if stored for seven or more days prior to testing.
   
   (5) The ends of each test board shall be trimmed prior to testing;
   
   (6) The kiln shall be operated as close as practical to the dominant drying schedule (dry bulb and wet bulb temperatures) at the subject facility for the wood species being tested; and
   
   (7) The wood samples shall be dried to a moisture content at or below the moisture content targeted by the subject facility.

b. **Record of testing parameters.** Production related parameters and equipment operating conditions shall be recorded during emissions testing to correlate operating conditions with emissions. Recorded parameters shall include the following if reasonably attainable:
   
   (1) Testing kiln details including: kiln dimensions, kiln air velocity, and heating method;
   
   (2) Sample size (board feet), sample weight, and lumber size (2" x 4", 4" x 8", etc.);
   
   (3) Drying time;
   
   (4) Wood moisture content (initial and final);
   
   (5) Temperature (continuously monitored and recorded wet bulb and dry bulb temperatures);
   
   (6) Lumber information including: percentage of heartwood vs. sapwood, ring count, percentage of face area that consists of knots, etc.;
   
   (7) Tree information: coastal or inland tree, tree age, approximate date harvested, if log was stored in fresh or salt water, etc.; and
   
   (8) Any interruptions in kiln operation.

All recorded production parameters shall be documented in the test results report.
4. Reporting Requirements:

a. A final emission test report shall be prepared and submitted to SWCAA within 45 calendar days of test completion. Each report shall be provided in an electronic format acceptable to SWCAA and as a hard (paper) copy. Each report shall include:
   (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;
   (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. VOC emissions shall be reported in pounds per thousand board feet (lb/Mbf) as VOC. Emissions of each VOC species quantified during the test shall be reported in units of lb/Mbf as the individual species. For the purposes of reporting total VOC emissions, the unspeciated fraction of the VOC emissions shall be assumed to be mono turpenes ($C_{10}H_{16}$).
1. Introduction:

The purpose of this testing is to quantify emissions from this baghouse and to demonstrate compliance with the requirements of this Permit and applicable air quality regulations.

2. Testing Requirements:

a. Test plan. A comprehensive test plan shall be submitted to SWCAA for review and approval at least ten business days prior to each test. SWCAA personnel shall be informed at least five business days prior to testing so that a representative may be present during testing.

b. Testing schedule. Initial testing was completed on December 19, 2006. Emission testing shall be conducted every ten years thereafter, no later than the end of December.

c. Test runs/Reference test methods. A minimum of three (3) test runs at maximum operating conditions for a minimum of one hour shall be performed for each constituent listed below to ensure the data are representative. Compliance shall be demonstrated by averaging the results of the individual sampling runs. The sampling methods and schedules shall be used unless alternate methods/schedules are approved in writing by SWCAA in advance of the emission testing.

<table>
<thead>
<tr>
<th>Constituent</th>
<th>Reference Test Method</th>
<th>Minimum Test Run Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM (filterable)</td>
<td>EPA Method 5</td>
<td>60 minutes</td>
</tr>
<tr>
<td>Opacity</td>
<td>SWCAA Method 9</td>
<td>15 minutes</td>
</tr>
</tbody>
</table>

3. Source Operation:

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

b. Record of production parameters. Production related parameters and equipment operating conditions shall be recorded during emissions testing to correlate operating conditions with emissions. Recorded parameters shall, at a minimum, include process start ups and shutdowns, baghouse pressure drop and plant adjustments. All recorded production parameters shall be documented in the test results report.
Appendix D  Page 2 of 2
Emission Testing Requirements
Carothers and Son Baghouse

4. Reporting Requirements:
   a. A final emission test report shall be prepared and submitted to SWCAA within 45
calendar days of test completion and, at a minimum, shall 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,
   (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,
   (12) A statement signed by the senior management official of the testing firm certifying the
   validity of the source test report,
   (13) An electronic copy of the test report shall be provided to SWCAA,
   (14) Results shall be reported as measured with no O₂ correction.