



**Sierra Pacific Industries – Lumber Mill  
AIR OPERATING PERMIT**

Olympic Region Clean Air Agency  
2940 Limited Lane NW  
Olympia, WA 98502  
(360) 539-7610 or 1-800-422-5623

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ISSUED IN ACCORDANCE WITH:  
Chapter 70.94 RCW, and Chapter 173-401 WAC

PERMIT NO: 15AOP1084

ISSUANCE DATE: **DRAFT**

EXPIRATION DATE: **(5 Years from Permit Issuance)**

PERMITTEE & MAILING ADDRESS: Sierra Pacific Industries – Lumber Mill  
301 Hagara ST  
Aberdeen, WA 98520

FACILITY LOCATION: 301 Hagara ST  
Aberdeen, WA 98520

FACILITY DESCRIPTION: Lumber Mill

ORCAA File #: 209

PRIMARY SIC: 2421

NAICS: 321113

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## I. ABBREVIATIONS

The following is a list of abbreviations used in this permit.

Administrator	EPA Region X Administrator
AOP	Air Operating Permit
AR#	Refers to a specific applicable requirement numbered “#”
ASTM	Formerly known as the American Society for Testing and Materials now ASTM International
BACT	Best Available Control Technology
CFR	Code of Federal Regulations
CMS	Continuous monitoring system
CO	Carbon monoxide
dscfm	Dry standard cubic feet per minute
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 or condition numbered “#”
gal/m	Gallons per minute
GHG	Greenhouse gas
grain/dscf	Concentration in terms of grains per dry standard cubic feet.
HAP	Hazardous Air Pollutant
HCl	Hydrogen Chloride
Hg	Mercury
HP	Horsepower
lbs/hr	Pounds per hour
LIDAR	Light Detection And Ranging
LPG	Liquid petroleum gas
M#	Refers to a specific monitoring term or condition numbered “#”
mg/L	Milligram per liter
MMBtu/hr	Million British Thermal Units per hour
N/A	Not Applicable
NCASI	National Counsel on Air and Stream Improvement
NH <sub>3</sub>	Ammonia
NOC	Notice of Construction
NO <sub>x</sub>	Oxides of Nitrogen
NSR	New Source Review
O&M	Operations and Maintenance Plan
ORCAA	Olympic Region Clean Air Agency
P#	Refers to a specific permit term or provision numbered “#”
Subpart DDDDD	Refers to 40 CFR Part 63, Subpart DDDDD
PM	Particulate matter air pollution
PM <sub>10</sub>	Particulate matter with aerodynamic diameter less than 10 microns.
ppm	Parts per million by volume (assumed standard and dry)
psig	Pounds per square inch (gage)

PW#	Refers to a plant-wide applicable requirement numbered “#”
R#	Refers to a specific reporting term or condition numbered “#”
RCW	Revised Code of Washington
Req	Stands for “Requirement”
SIC	Standard Industrial Classification
SO <sub>2</sub>	Sulfur dioxide
TAP	Toxic Air Pollutant
tBACT	BACT for a toxic air pollutant
TSM	Total Selected Metals
VOC	Volatile Organic Compounds
WAC	Washington Administrative Code
§	40 CFR

## II. REGULATORY BASIS

Pursuant to Chapter 173-401 Washington Administrative Code (WAC), Sierra Pacific Industries (SPI) is authorized to operate their dimensional lumber mill located at 301 Hagara Street in Aberdeen, Washington, in accordance with the terms and conditions listed in this permit.

The terms and conditions in this permit contain the emission limitations, operating requirements, and monitoring, recordkeeping, and reporting requirements that apply to the facility. All terms and conditions of this permit, including any provisions designed to limit potential to emit, are enforceable under the Federal Clean Air Act (FCAA) unless specifically identified as not federally enforceable in the "regulatory basis" description that follows each condition. Conditions identified as "local only" are enforceable only by Olympic Region Clean Air Agency (ORCAA). Conditions identified as "state only" are enforceable only by the State of Washington. Conditions identified as "state/local only" are enforceable only by ORCAA and the state of Washington. Conditions identified as "local only", "state only", or "state/local only" are not federally enforceable.

The conditions in this permit contain abbreviated and in some cases paraphrased versions of the exact language of the applicable requirements from the underlying laws, regulations and regulatory orders. Any difference between the description of an applicable requirement in this permit compared to the corresponding law, regulation or order is provided for purposes of clarifying the underlying requirement. The legal requirement remains the underlying applicable requirement cited in the "Applicable Requirement" column of the tables and the citations contained in brackets at the end of each requirement. Any perceived conflicts between the permit and an underlying applicable requirement will be resolved by referring to the cited applicable requirement.

Unless otherwise stated, terms used in the conditions of this permit shall be defined consistent with their definitions from the corresponding referenced regulations. If not defined in the referenced regulations, terms shall be defined consistent with the definitions contained in Chapter 70.94 RCW, WAC 173-401-200, WAC 173-400-030, and ORCAA Rule 1.4. Terms not defined in this permit or by applicable regulation shall be defined consistent with the Merriam-Webster's Collegiate Dictionary, Eleventh Edition copyright © 2003 by Merriam-Webster Inc.

Unless otherwise stated, the versions of the referenced laws, regulations and orders cited in this permit are the versions that were in effect on the date this permit was issued.

### III. EMISSION UNIT IDENTIFICATION

The following emissions units are covered under this permit. <sup>1</sup>

**Table 2.1: Emissions Units Covered Under Permit**

Emission Unit ID#	Description	Air Pollution Control Technology	Constructed or Installed	Effective NOCs
EU1	Natural gas fired Babcock and Wilcox model 101-88B boiler rated at 40 MMBtu/hr	Good combustion practices	2003	01NOC192
EU2	Eight steam-heated double track lumber drying kilns	Steam management system, temperature limit	2003	06NOC490 11MOD861 15ADM1089
EU3	Planer mill pneumatic dust collection system, 50,440 acfm	Dual cyclones, baghouse (MAC #120MCF494)	2003	04NOC392
EU4	Spray application system for wood brighteners and fungicides	Squirrel cage mist eliminators, HAP-free coatings	2003	02NOC268
EU5	Diesel engine powering emergency fire pump	Ultra-low sulfur diesel and good combustion practices.	2011	None- NSR never triggered

### IV. PERMIT TERMS AND PROVISIONS

Permit administration terms and provisions govern administration of the permit and include AOP administrative and other requirements that have no ongoing compliance monitoring requirements. The permittee must comply with the requirements listed below, and must certify compliance annually. Unless the text of the term is specifically identified to be directly enforceable, the language of the cited applicable requirement takes precedence.

**P1. Permit Duration.** This permit is issued for a fixed term of 5 years from date of issuance. [WAC 173-401-610]

**P2. Federally Enforceable Requirements.**

- a) All terms and conditions in this air operating permit, including any provision designed to limit potential to emit, are enforceable by the Administrator and citizens under the FCAA, except as indicated in (b) below.
- b) Notwithstanding subsection (a) of this condition, 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 and -820.

[WAC 173-401-625]

**P3. Compliance Maintenance.** The permittee shall maintain compliance with all applicable requirements with which the source was in compliance as of the date of permit issuance. The permittee shall meet on a timely basis any applicable requirements that become effective during the permit term.

<sup>1</sup> The information in Table 2.1 is for purposes of description only and is not intended as a limitation.

[WAC 173-401-510(2)(h)(iii); WAC 173-401-630(3)]

**P4. Standard Conditions:**

- a) ***Duty to comply.*** The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation of Chapter 70.94 RCW and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application. [WAC 173-401-620(2)(a)]
- b) ***Need to Halt or Reduce Activity Not a Defense.*** It shall not be a defense for the 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. [WAC 173-401-620(2)(b)]
- 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 re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [WAC 173-401-620(2)(c)]
- d) ***Property Rights.*** This permit does not convey property rights of any sort, or any exclusive privilege. [WAC 173-401-620(2)(d)]
- e) ***Duty to Provide Information.*** The permittee shall furnish to ORCAA, within a reasonable time, any information that ORCAA 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 ORCAA copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to ORCAA along with a claim of confidentiality per Condition P14. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70.94.205. [WAC 173-401-620(2)(e)]
- f) ***Annual Fees.*** The permittee shall pay an annual permit fee as a condition of this permit in accordance with ORCAA's fee schedule contained in Rule 3.2. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in Chapter 70.94 RCW. [ORCAA 3.2; WAC 173-401-620(2)(f)]
- g) ***Emission 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 the permit. [WAC 173-401-620(2)(g)]
- h) ***Severability.*** If any provision of this permit is to be held invalid, all unaffected provisions of the permit shall remain in effect and enforceable. [WAC 173-401-620(2)(h)]
- i) ***Permit Appeals.*** This permit or any conditions in it may be appealed only by filing an appeal with the Washington State Pollution Control Hearings Board and serving it on ORCAA within 30 days from receiving 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. [WAC 173-401-620(2)(i)]
- j) ***Permit continuation.*** This permit and all terms and conditions contained therein, including any permit shield provided under WAC 173-401-640, 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.

[WAC 173-401-620(2)(j)]

**P5. Duty to Supplement or Correct Application.** The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information.  
[WAC 173-401-500(6)]

**P6. False or Misleading Statements.** No person shall willfully make a false or misleading statement to ORCAA as to any matter within the jurisdiction of ORCAA. No person shall make any false material statement, representation or certification in any form, notice or report required under chapter 70.94 or 70.120 RCW, or any ordinance, resolution, regulation, permit or order in force pursuant thereto.  
[State/Local only: WAC 173-400-105(6); Local only: ORCAA 7.2]

**P7. Permit Renewal Application.** The permittee shall submit a complete renewal application to ORCAA at least 6 months, but no more than 18 months, prior to the expiration date of this permit.  
[WAC 173-401-710(1)]

**P8. Permit Expiration – Application Shield.** Permit expiration terminates the permittee’s right to operate unless a timely and complete renewal application has been submitted consistent with Condition P7. All terms and conditions of the permit shall remain in effect after the permit itself expires if a timely and complete permit application has been submitted.  
[WAC 173-401-710(3)]

**P9. Permit Revocation.** 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 holder of a current operating permit 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.  
[WAC 173-401-710(4)]

**P10. Reopening for Cause.** The permit shall be reopened and revised under any of the following circumstances:

- a) Additional requirements become applicable to the 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) ORCAA or the 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) ORCAA or the Administrator 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 permittee 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.

[WAC 173-401-730]

**P11. Changes not Requiring Permit Revision/Off Permit Changes.** The permittee may make the changes described in WAC 173-401-722 and WAC 173-401-724 without revising this permit, provided that the changes satisfy the criteria set forth in those sections, including the requirements to notify ORCAA and EPA.

[WAC 173-401-722; WAC 173-401-724]

**P12. Administrative Permit Amendments.** The permittee may request an "administrative permit amendment" for the following types of permit revisions:

- a) Correction of typographical errors;
- b) Change the name, address, or phone number of any person identified in the permit, or provide a similar minor administrative change at the source;
- c) Require more frequent monitoring or reporting by the permittee;
- d) Allow for a change in ownership or operational control of a source where the permitting authority determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the permitting authority; and,
- e) Incorporate into the chapter 401 permit the terms, conditions, and provisions from orders approving NOC applications processed under an EPA-approved program.

Application and approval of administrative permit amendment applications shall conform to the procedures in WAC 173-401-720.

[WAC 173-401-720]

**P13. Permit Modifications.** Permit revisions that cannot be accomplished using the provisions for administrative permit amendments shall be applied for and approved according to WAC 173-401-725.

[WAC 173-401-725]

**P14. Greenhouse Gas Reporting Fee.** The Permittee must pay a greenhouse gas (GHG) reporting fee for each year they submit a GHG report to Ecology. Ecology will publish the fee schedule for the following year on or before October 31<sup>st</sup> of each year.

[*State Only*: WAC 173-441-110]

**P15. Confidential Information.** The permittee is responsible for certifying and clearly identifying any information considered proprietary and confidential. In the case where a permittee has submitted information to ORCAA under a claim of confidentiality, ORCAA may also require the permittee to submit a copy of such information directly to the administrator. The permittee is

responsible for clearly identifying information that is considered proprietary and confidential prior to submittal to ORCAA. In addition, all confidential information shall be submitted according to ORCAA's Public Records and Confidentiality Procedures.

[WAC 173-401-500(5); *Local Only*: ORCAA Rule 1.6; WAC 173-401-630(1)]

**P16. Credible Evidence.** For purposes of certifying compliance or establishing whether or not the permittee has violated or is in violation of any requirement of 40 CFR Part 60, nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with the requirements if the appropriate performance or compliance test or procedure had been performed.

[40 CFR 60.11(g)]

**P17. Emergency as Affirmative Defense.** An emergency, as defined in WAC 173-401-645(1), constitutes an affirmative defense to an action brought for non-compliance with a technology-based emission limitation provided the criteria and procedures of WAC 173-401-645(3) are met. This provision is in addition to the affirmative defense for unavoidable excess emissions found in WAC 173-400-107. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that demonstrates:

- a) An emergency occurred and that the permittee can identify the cause(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 2 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 or safety. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

[WAC 173-401-645]

**P18. Unavoidable Excess Emissions Excused.** Excess emissions due to startup, shutdown, scheduled maintenance or upset conditions that are determined by ORCAA to be unavoidable under the procedures and criteria in WAC 173-400-107 and ORCAA Rule 8.7, shall be excused and not subject to penalty. The permittee shall have the burden of proving to ORCAA that excess emissions were unavoidable. Excess emissions may qualify for consideration as unavoidable excess emissions provided the permittee includes in the permit deviation report required by condition R5(c) of this permit, information that demonstrates:

- a) The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition;
- b) The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance; and
- 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 emissions unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded.

[WAC 173-400-107(6); *Local Only*: ORCAA 8.7(c)]

**P19. Certification.** All documents required to be submitted by this permit shall contain certification by a responsible official of truth, accuracy, and completeness. Documents include any application form, report, or compliance certification including but not limited to test plans and results, monitoring plans and results, applications, emissions inventory submittals, equipment malfunction reports or annual compliance certification. Such certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

*[WAC 173-401-520; WAC 173-401-615(3)(a); WAC 173-401-630(1)]*

## **V. GENERAL TERMS AND CONDITIONS**

**G1. Inspection and Entry.** Upon presentation of appropriate credentials, the permittee shall allow a representative from ORCAA or an authorized representative to perform the following:

- a) Enter upon the premises where a chapter 173-401 WAC source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b) Have access to and copy at reasonable times any records that must be kept under the conditions of this permit;
- c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements.
- e) Nothing in this condition or permit shall limit the ability of EPA to inspect or enter the premises of the permittee under Section 114 or other provisions of the Clean Air Act.

*[WAC 173-401-630(2)]*

**G2. Access for Inspection.** No person shall refuse entry or access to an ORCAA representative who requests entry for the purpose of inspection, and who presents appropriate credentials; nor shall any person obstruct, hamper or interfere with any such inspection.

*[Local Only: ORCAA 1.5(e)]*

**G3. Insignificant Emission Units.** The following applies to emissions units determined insignificant based on actual emissions in accordance with WAC 173-401-530(1)(a):

- a) Any emission unit or activity that qualifies as insignificant solely on the basis of provisions in WAC 173-401-530(1)(a) shall not exceed the emission thresholds specified in WAC 173-401-530(4) until this permit is modified pursuant to condition P13.
- b) Upon request from the permitting authority the permittee must provide sufficient documentation to enable the permitting authority to determine that the emission unit or activity has been appropriately listed as insignificant.
- c) Upon request from the permitting authority, at any time during the term of the permit, the permittee shall demonstrate to the permitting authority that the actual emissions of any unit or activity claimed insignificant on the basis of actual emissions are below the emission thresholds listed in WAC 173-401-530(4).

*[WAC173-401-530]*

**G4. New Source Review.** Prior to commencing any new installation, replacement, modification or alteration of any stationary source, emission unit, area source or fugitive source, the permittee shall secure all necessary approvals under Rule 6.1 of ORCAA's Regulations.

[*Local only*: ORCAA 6.1]

**G5. Replacement or Substantial Alteration of Existing Control Equipment.** Prior to commencing replacement or substantial alteration of existing control equipment, the permittee shall secure all necessary approvals under Rule 6.1 of ORCAA's Regulations.

[WAC 173-400-114, *Local Only*: ORCAA 6.1.10]

**G6. Temporary Sources.** The permittee may operate portable air contaminant sources including portable and temporary generators at temporary locations within the facility subject to this permit provided that the permittee has complied with the requirements for temporary portable sources under ORCAA Rule 6.1.1.

[WAC 173-401-635; ORCAA 6.1.1; WAC 173-401-635]

**G7. Demolition and Asbestos Projects.** The permittee shall comply with the notification and approval requirements in Rule 6.3 of ORCAA's Regulations prior to commencing any asbestos, renovation, or demolition project at the facility as defined in ORCAA Rule 6.3.1. The permittee shall conduct all renovation, demolition and asbestos projects in accordance with applicable asbestos control standards and requirements in ORCAA Rule 6.3.

[*Local Only*: ORCAA 6.3]

**G8. Demolition and Renovation Projects.** The permittee shall comply with the notification requirements in 40 CFR 61.145(b) and Rule 6.3 of ORCAA's Regulations prior to commencing any renovation or demolition activities at the facility as defined in 40 CFR 61.141 by submitting a notification to ORCAA. This satisfies the notification requirements for both regulations. The permittee shall conduct all renovation, demolition and asbestos projects in accordance with applicable asbestos control standards and requirements in Subpart M of 40 CFR Part 61.

[40 CFR Part 61, Subpart M; ORCAA 6.3]

**G9. Protection of Stratospheric Ozone.** The permittee shall comply with the standards for recycling and emissions reduction as provided in 40 CFR 82, Subparts B and F.

[40 CFR 82, Subparts B & F]

**G10. Prohibition of Emissions Detrimental to Persons or Property.** No person shall cause or permit the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business.

[*State/Local Only*: WAC 173-400-040(6); *Local Only*: ORCAA 7.6]

**G11. Concealment and Masking Prohibited:**

- a) No person shall cause or allow the installation or use of any device or use of any means, which conceals or masks an emission of air contaminant, which would otherwise violate any provisions of ORCAA's Regulations or chapter 173-400 WAC, 40CFR Part 60, or 40 CFR Part 63.

- b) No person shall cause or allow the installation or use of any device or use of any means designed to conceal or mask the emission of an air contaminant, which causes detriment to health, safety, or welfare of any person, or cause damage to property or business.
- c) Such concealment includes, but is not limited to-
  - i) The use of diluents to achieve compliance with a relative standard based on the concentration of a pollutant in the effluent discharged to the atmosphere;
  - ii) The use of gaseous diluents to achieve compliance with a relative standard for visible emissions.

[*State/Local Only*: WAC 173-400-040(8); *Local Only*: ORCAA 7.5; §60.12; §63.4(b)]

## VI. APPLICABLE REQUIREMENTS

### Applicable Plant-wide Requirements

Req #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
PW1	WAC 173-400-040(3) <i>(state/ local only)</i> ORCAA 8.3(e) <i>(local only)</i>	<b>Fallout.</b> No person shall cause or permit the emission of particulate matter from any source to be deposited beyond the property under direct control of the owner(s) or operator(s) of the source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited.	None	M4
PW2	WAC 173-400-040(5) <i>(state/ local only)</i>	<b>Odor Control (State).</b> Any person who shall cause or allow the generation of any odor from any source which may unreasonably interfere with any other property owner's use and enjoyment of his or her property must use recognized good practice and procedures to reduce these odors to a reasonable minimum.	None	M4
PW3	ORCAA 8.5 <i>(local only)</i>	<b>Odor Control (ORCAA).</b> Reasonably available control technology (RACT) shall be installed and operated to mitigate odor-bearing gases emitted into the atmosphere to a minimum, or, so as not to create air pollution. No person shall cause or allow the emission or generation of any odor from any source that unreasonably interferes with another person's use and enjoyment of their property.	None	M4
PW4	WAC 173-400-040(4)(a)	<b>Fugitive Emissions Control.</b> The owner or operator of any emission unit engaging in materials handling, construction, demolition or any other operation which is a source of fugitive emissions shall take reasonable precautions to prevent release of air contaminants from the operation.	None	M1, M2, & M8
PW5	WAC 173-400-040(9)(a) <i>(state/ local only)</i> ORCAA 8.3(c) <i>(local only)</i>	<b>Fugitive Dust Control.</b> Reasonable and/or appropriate precautions shall be taken to prevent fugitive particulate material from becoming airborne: <ul style="list-style-type: none"> <li>a) When handling, loading, unloading, transporting, or storing particulate material;</li> <li>b) When constructing, altering, repairing or demolishing a building, or its appurtenance, or a road; or</li> <li>c) From an untreated open area.</li> </ul> <p>Clarification added: For the purpose of this requirement, fugitive particulate means particulate material which is generated incidental to an operation, process or procedure and is emitted into the open air from points other than an opening designed for emissions such as a stack or vent.</p>	None	M1, M2, & M8
PW6	ORCAA 8.8 <i>(local only)</i>	<b>Maintenance and Repair of Air Pollution Control Equipment and Processes.</b> All air contaminant sources are required to keep any process and/or air pollution control equipment in good operating condition and repair.	None	Specific to each Emissions Unit

## Applicable Plant-wide Requirements *continued*

Req #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
PW7	WAC 173-400-040(2) ORCAA 8.2 (local only)	<b>General Standards for Maximum Visual Emissions.</b> (a) In equipment or facilities, including boilers using hogged fuel, regardless of their date of installation, no person shall cause or allow the emission to the outdoor atmosphere, for more than three (3) minutes in any one hour, of a gas stream containing air contaminants which are greater than 20% opacity. (b) Observations shall be made by trained and certified observers or by LIDAR instrumentation. (c) The exceptions to the opacity standard stated in (a) above are as follows: i. Emissions occurring due to soot blowing or grate cleaning may be greater than 20% opacity; providing the operator can demonstrate that soot blowing or grate cleaning will not exceed a total of 15 minutes in any consecutive 8 hours. This practice, except for testing and troubleshooting, is to be scheduled for the same approximate times each day and ORCAA shall be advised of the schedule. ii. When the owner or operator of a source supplies valid data to show that the presence of uncombined water is the only reason for the opacity to exceed 20%.	Ecology Method 9A	M1 M2 M3
PW8	WAC 173-400-040(7)	<b>Sulfur Dioxide.</b> WAC 173-400-040(7) prohibits emission of a gas containing sulfur dioxide from any emission unit in excess of 1000 ppm of sulfur dioxide on a dry basis, corrected to 7% oxygen for combustion sources, and based on the average of any period of 60 consecutive minutes in accordance with the reference test method.	EPA Method 6, 6A, 6B, or 6C	M6
PW9	WAC 173-400-050(1)	<b>General Particulate Standards for Combustion Units (State).</b> No person shall cause or permit the emissions of particulate matter in excess of 0.23 gram per dry cubic meter at standard conditions (0.1 grain/dscf), except, for an emissions unit combusting wood derived fuels for the production of steam. No person shall allow or permit the emission of particulate matter in excess of 0.46 gram per dry cubic meter at standard conditions (0.2 grain/dscf), as measured by EPA method 5 in Appendix A to 40 CRF Part 60.	EPA Method 5 of 40 CFR Part 60, Appendix A	M7
PW 10	ORCAA 8.3(a) & (b) (local only)	<b>General Particulate Standards for Combustion Units (ORCAA).</b> No person shall cause or allow the emissions of particulate matter to the outdoor atmosphere from any single source in excess of 0.10 grains per standard cubic foot of gas (calculated at 7% oxygen). Measured concentrations shall be adjusted for volumes corrected to 7% oxygen, except when ORCAA determines that an alternative oxygen correction factor is more representative of normal operations. In addition, ORCAA requires including the "back half" condensable particulate matter for determining compliance with ORCAA 8.3(a) in accordance with Methods 5 and 202.	EPA Method 5 and 202 of 40 CFR Part 60, Appendix A	M7
PW 11	WAC 173-400-060	<b>General Emission Standards for Process Units.</b> No person shall cause or permit the emission of particulate material from any general process operation in excess of 0.23 grams per dry cubic meter at standard conditions (0.1 grain/dscf) of exhaust gas as measured by EPA Methods 5 and 202.	EPA Method 5 of 40 CFR Part 60 Appendix A and EPA Method 202 of 40 CFR 51 Appendix M	M7

## Applicable Plant-wide Requirements *continued*

Req #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
PW 12	WAC 173-400-040(4)&(9) ORCAA Rule 8.3(c) (local only) 15ADM1089, Condition #6	<b>Dust Management Plan:</b> SPI shall develop and implement a plan for controlling emissions of fugitive dust. The plan shall include, but is not limited to, the following: <ul style="list-style-type: none"> <li>a. Replacing cleated belts with smooth belts</li> <li>b. Installing heavy-duty belt wipers/cleaners on all outside conveyor belts</li> <li>c. Sealing up transition points on outside fuel conveyors</li> <li>d. Installing water-misting systems at transition points</li> <li>e. Erecting a tunnel to enclose infeed to the planer hog</li> <li>f. Installing bottom covers on belts that deliver fuel from the sawmill to the fuel house</li> <li>g. Enclosing all conveyors at the lower level inside the sawmill</li> <li>h. Operating a street sweeper on a daily basis</li> </ul>	None	M8
PW 13	15ADM1089, Condition #2	<b>Production Limitation:</b> The facility shall limit production to no more than 350 million board feet of total (green and dried) dimensional lumber during any 12-consecutive month period, of which 315 million board feet may be kiln dried.	None	Record Keeping Only RK13
PW 14	01NOC192, Condition #9	<b>Operation and Maintenance Plan:</b> The owner or operator shall develop and implement an Operation and Maintenance (O&M) plan for operating and maintaining the lumber mill and its pollution control equipment. The O&M plan shall be kept in a manual on site and made available to all employees of the facility. At a minimum, the O&M plan shall contain procedures for the inspection and prompt repair of the boiler, cyclone and baghouse.	None	Record Keeping Only RK12

## Applicable Requirements for Boiler (EU1)

Req #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
N/A	Classification of boiler under 40 CFR Part 63, Subpart DDDDD	For purposes of regulation under 40 CFR Part 63, Subpart DDDDD, the natural gas fired boiler (EU1) is classified as an existing boiler under the "Units designed to burn gas 1 fuels" classification.		
AR 1.1	01NOC192, Condition #1	Boiler NO <sub>x</sub> Limit: Emissions of nitrogen oxides (NO <sub>x</sub> ) from the boiler shall not exceed 0.05 pounds per million Btu heat input (lb/MMBtu <sub>heat input</sub> ) as determined by EPA 40CFR Part 60 Appendix A Method 7E.	EPA Method 7E of 40 CFR Part 60, Appendix A.	M7
AR 1.2	01NOC192, Condition #2	Boiler CO Limit: Emissions of carbon monoxide (CO) from the boiler shall not exceed 0.05 pounds per million Btu heat input (lb/MMBtu <sub>heat input</sub> ) as determined by EPA 40CFR Part 60 Appendix A Method 10A.	EPA Method 10A of 40 CFR Part 60, Appendix A.	M7
AR 1.3	01NOC192, Condition #3	Boiler Opacity Limit: Emissions from the boiler shall not exceed 10% opacity in accordance with EPA 40CFR Part 60 Appendix A Method 9, except during start-up or shut-down of the boiler.	EPA Method 9 of 40 CFR Part 60, Appendix A.	M1 M2 M3
AR 1.4	01NOC192, Condition #5	Fuel Requirements: The boiler shall burn only natural gas.	None	Record Keeping Only RK1

## Applicable Requirements for Boiler (EU1) *continued*

Req #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
AR 1.5	§ 63.52(f) §63.7540(a)(10)(i-vi)	<p>Annual Boiler Tune-Up: You must conduct an annual tune-up of the boiler or process heater to demonstrate continuous compliance as specified in paragraphs (a)(10)(i) through (vi) of this section. You must conduct the tune-up while burning the type of fuel (or fuels in case of units that routinely burn a mixture) that provided the majority of the heat input to the boiler or process heater over the 12 months prior to the tune-up.</p> <ul style="list-style-type: none"> <li>(i) Inspect the burner, and clean or replace any components of the burner as necessary.</li> <li>(ii) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;</li> <li>(iii) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown);</li> <li>(iv) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject;</li> <li>(v) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and</li> <li>(vi) Maintain on-site and submit, if requested by the Administrator, a report containing the information in paragraphs (a)(10)(vi)(A) through (C) of this section, <ul style="list-style-type: none"> <li>(A) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;</li> <li>(B) A description of any corrective actions taken as a part of the tune-up; and</li> <li>(C) The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.</li> </ul> </li> </ul>	None	Record Keeping Only RK18
AR 1.6	§ 63.7515(d)	<p>Annual Boiler Tune-Up Scheduling: You must conduct an annual performance tune-up according to §63.7540(a)(10). Each annual tune-up specified in §63.7540(a)(10) must be no more than 13 months after the previous tune-up.</p> <p>If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.</p>	None	Record Keeping Only RK18

## Applicable Requirements for the Lumber Kilns (EU2)

Req #	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
AR 2.1	15ADM1089, Condition #2	Production Limitation: Limits dimensional lumber production to 350 MMbf/yr, of which 315 MMbf/yr may be kiln dried.	None	Record Keeping Only RK13
AR 2.2	15ADM1089, Condition #3	Material Limitation: The facility is permitted to dry hemlock and Douglas fir. SPI may dry other species of wood if they can demonstrate that it results in equal or lower emission rates of each TAP, overall VOC, and PM <sub>10</sub> than the maximum of either hemlock or Douglas fir by providing ORCAA with acceptable emission factors	None	Record Keeping Only RK13
AR 2.3	15ADM1089, Condition #4	Kiln Temperature Limitation: The kilns shall be operated at an average temperature of 200 °F or lower at all times. If a kiln temperature rises above 200 °F action shall be taken to reduce the temperature immediately. If an overheated kiln cannot be returned to a temperature of 200 °F or lower and maintained at such a temperature within 24-hours, all wood shall be removed until the unit is repaired.  Provisions Added for Clarification: <ol style="list-style-type: none"> <li>1. Kiln temperature means the dry-bulb kiln temperature.</li> <li>2. Average kiln temperature means the daily average dry-bulb kiln temperature.</li> </ol>	None	M10
AR 2.4	15ADM1089, Condition#7	<b>Operation and Maintenance Plan:</b> SPI shall develop, implement, and modify when necessary an operation and maintenance plan to assure continuous compliance with the kiln temperature limitation. The plan shall include regularly scheduled testing of the temperature monitoring system.	None	Record Keeping Only RK12

## Applicable Requirements for Planer Mill (EU3)

#	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
AR 3.1	04NOC392, Condition #2	Stack Exhaust: The exhaust stack of the MAC MCF Filter Model # 120MCF494 baghouse shall have a vertical discharge to the atmosphere at least 6 feet above the peak height of the building. There shall be no flow obstructions at the point of discharge from the stack (i.e. cap). However, a weather-proof stack exhaust configuration which does not obstruct the air flow as it exits the stack is acceptable.	None	None
AR 3.2	04NOC392, Condition #3	Monitoring: The baghouse shall be equipped with a device for continuously monitoring pressure drop across the filters. Visual read-out from the monitor shall be accessible during inspection.	None	M9
AR 3.3	04NOC392, Condition #4	Opacity Limit: Emissions from the baghouse shall not exceed 10% opacity in accordance with EPA 40CFR Part 60 Appendix A Method 9.	EPA Method 9 of 40 CFR Part 60, Appendix A.	M1, M2, M3
AR 3.4	04NOC392, Condition #5 §64.7(b)	Operation and Maintenance Plan: At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. Sierra Pacific Industries shall develop and implement an Operations and Maintenance (O&M) plan for operating and maintaining the baghouse and associated monitoring equipment. The O&M plan shall be kept in a manual on site and shall be made available to all operators of the unit. At a minimum, the O&M plan shall include the manufacturer's recommended minimum and maximum operating pressure drops across the fabric filters, and procedures for inspection and prompt repair of the baghouse equipment and CAM equipment.	None	Record Keeping Only RK12
AR 3.5	§64.7(d)	(1) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. (2) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.	None	Record Keeping Only RK10 R6

## Applicable Requirements for the Spray Coating System (EU4)

#	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
AR 4.1	02NOC268, Condition #1	Material Use: The spray system shall only be used to apply water-borne fungicide solutions. Any change in coating type or manufacturer shall first be approved by ORCAA	None	None
AR 4.2	02NOC268, Condition #3	Stack Specifications: The spray system shall exhaust through a vertical stack, with a vertical discharge to the atmosphere at a height of at least six feet above the peak height of the connected building. There shall be no flow obstructions at the point of discharge from the stack (i.e. cap). However, a weather-proof stack exhaust configuration which does not obstruct the air flow as it exits the stack, is acceptable.	None	None
AR 4.3	02NOC268, Condition #4	Operation & Maintenance: The owner or operator shall devise, implement and update when necessary, an Operations and Maintenance (O&M) plan for assuring good operating and repair of all generating equipment (spray coating equipment) and control devices. The plan shall include: (a) Inspection and maintenance procedures and schedule. (b) Prescribed acceptable ranges for operation based on manufacturer recommendations.	None	Record Keeping Only RK12
AR 4.4	02NOC268, Condition #5	VOC Emissions: All reasonable measures and precautions shall be taken for minimizing volatile emissions including but not limited to: (a) Keeping VOC-containing material in closed containers. (b) Minimizing and promptly cleaning up spills and leaks of VOC-containing materials. (c) Using low-VOC coatings and solvents when suitable. (d) Conducting coating operations only in the approved spray system. (e) Operating the mist eliminator and exhaust/ventilation systems at all times during coating operations. (f) Turning off the spray system when not being used to coat lumber. (g) Immediately collecting all overspray/runoff in a closed container.	None	None

## Applicable Requirements for Diesel Engine Powering Emergency Fire Pump (EU5)

#	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Required Monitoring Provisions
AR 5.1	Table 2c to 40CFR Part 63 Subpart ZZZZ: Emergency stationary CI RICE and black start stationary CI RICE	Engine Maintenance: You must meet the following requirement, except during periods of startup: a. Change oil and filter every 500 hours of operation or annually, whichever comes first. b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	None	Record Keeping Only RK10
AR 5.2	§63.6625(e)(2)	Operation and Maintenance. You must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.	None	Record Keeping Only RK12
AR 5.3	§63.6625(f)	Hour Meter: You must install a non-resettable hour meter if one is not already installed.	None	Record Keeping Only RK1
AR 5.4	§63.6640(f)	Emergency RICE Operation. (1) There is no time limit on the use of emergency stationary RICE in emergency situations. (2) You may operate your emergency stationary RICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2). (i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.	None	Record Keeping Only RK1

## VII. MONITORING TERMS AND CONDITIONS

### *Plant-wide Monitoring*

M1. **Opacity Surveys.** The permittee shall conduct visual surveys of the facility during daylight hours as follows:

- a. The frequency for conducting the survey shall be weekly.
- b. Surveys shall be conducted from locations with a clear view of the facility and where the sun is not directly in the observer's eyes. Survey locations shall be at least 15 feet but not more than .25 miles from the facility.
- c. Surveys shall be conducted when the facility is operating.
- d. Observer certification for plume evaluation is not required to conduct the survey. However, it is necessary that the observer is educated on the general procedures for determining the presence of visible emissions. As a minimum, the observer must be trained and knowledgeable regarding the effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, observer position relative to source and sun, and the presence of uncombined water.
- e. The survey shall consist of a general scan of the facility and direct observation of all stacks to identify any visible emissions excluding water vapor.
- f. Each stack shall be observed for a minimum cumulative duration of 15 seconds during the survey.
- g. Any visible emissions other than uncombined water shall be recorded as a positive reading associated with the emission point or stack.
- h. If it is not possible to conduct the survey due to inclement weather conditions, the permittee shall make three attempts during the day to conduct the survey. All attempts to conduct the survey shall be recorded in accordance with Condition RK3.
- i. In addition to the records required under Condition RK3, the observer shall record the wind direction, sky condition, sun location with respect to the facility and the survey location, and the time duration of the survey.
- j. Opacity surveys for the Babcock and Wilcox boiler are only required when the boiler is operating.

[WAC 173-401-615(1)(b)]

M2. **Compliance Demonstration Required.** When required by ORCAA, or when point or fugitive emissions are observed during surveys, other than visible emissions due to uncombined water, and corrections or mitigation measures are unsuccessful in eliminating the opacity, the Permittee shall:

- a. Complete Reference Method opacity readings for any emissions point exhibiting opacity in accordance with Condition M3; or,
- b. For fugitive emissions causing opacity, determine and document that reasonable and/or appropriate precautions are being taken to prevent the fugitive emissions.

The required compliance demonstrations shall be completed within 48 hours of the opacity survey that initially triggered them, except in situations where an emission unit is not operating, or lack of daylight or weather conditions prevent certified opacity readings, the required opacity testing shall be completed at the earliest practical date.

[WAC 173-401-615(1)(b)]

**M3. Opacity Reading Procedures.** When required, pursuant to condition M2, the permittee shall conduct certified opacity readings consistent with the appropriate reference test methods as follows:

- a. Certified opacity readings shall be initiated as soon as possible, but not later than 1 hour after the requirement to verify compliance is triggered unless the subject emission unit is not operating, or lack of daylight or weather conditions prevent conducting the testing;
- b. Certified opacity readings shall be performed by employees of the major source, a certified contractor, or by ORCAA, and shall be performed by persons with current certification for plume evaluation in accordance with EPA Method 9;
- c. All certified opacity readings shall be performed during periods when the subject emissions unit is operating;
- d. If the subject emissions unit is down for maintenance or not operating, the permittee shall commence compliance verification within 1 hour after the unit comes back on line;
- e. If it is not possible to perform certified opacity readings due to inclement weather conditions or lack of daylight, the permittee shall document the conditions and shall make repeated daily attempts to conduct the testing until it is accomplished; and,
- f. Compliance verification shall consist of certified opacity readings at 15 second intervals over a minimum period of 6 consecutive minutes (24 consecutive readings) unless any one reading is greater than 20% opacity in which case the observation period shall be 60 minutes or until a violation is documented.

[WAC 173-401-615(1)(b)]

**M4. Complaint Monitoring.** The permittee shall monitor all air quality related complaints directed to the facility as follows:

- a. The permittee shall provide an automatic phone recording system or an onsite contact person available to the general public for filing a complaint whenever the facility is operating.
- b. The phone number for the facility shall be a listed phone number and made available to local authorities including the county health department, ORCAA, Ecology, and the local fire department.
- c. The permittee shall maintain a record of air quality related complaints, which shall include, if available or provided, the following information:
  - i. Description of the complaint.
  - ii. Date and time the alleged impact was first and last noticed.
  - iii. Location where the alleged impact was experienced.
  - iv. Name and phone number of caller.
  - v. The permittee's assessment of the complaint.
  - vi. Description of any corrective action taken.

[WAC 173-401-615(1)(b)]

- M5. **GHG Monitoring Requirements.** The permittee shall monitor facility operations, fuel rates and composition of fuels as necessary to report GHG emissions to Ecology in accordance with Chapter 173-441 WAC. The following monitoring provisions apply:
- a. Permittee shall develop a written GHG monitoring plan in accordance with WAC 173-441-050(6)(e). The permittee shall revise the GHG monitoring plan as needed to reflect changes in processes, monitoring instrumentation, and quality assurance procedures; or to improve procedures for the maintenance and repair of monitoring systems to reduce the frequency of monitoring equipment downtime.
  - b. Flow meters and other measurement devices used to measure fuel feed rates, process steam flow rates, or feedstock flow rates to provide data to perform the GHG emissions calculations shall be calibrated according to the procedures specified in WAC 173-441-050(8).

[Chapter 173-441 WAC: *State only*]

- M6. **Sulfur Dioxide Emissions Monitoring.** The permittee shall determine on a weekly basis the average sulfur content in percent by weight or volume of each fuel combusted for all emission units at the facility, except for gaseous fuels. This determination shall be made individually for each fuel used by emission unit. Sulfur content of liquid fuels shall be determined for the fuel as received using ASTM D4294 or ISO 8754, except that the permittee may rely upon information from fuel suppliers such as Material Safety Data Sheets (MSDS), Certificates of Analysis or other certifications of the fuel composition from the fuel supplier. Sulfur content of wood derived fuels shall be determined based on published information from Compilation of Air Pollutant Emission Factors (AP-42), Volume I, Fifth Edition (EPA, January 1995), the latest edition of the Handbook of Chemistry and Physics or other established scientific reference manual.

[WAC 173-401-615(1)(b)]

- M7. **General Source Testing Procedures and Methods.** To demonstrate compliance, Ecology or the authority may conduct or require that a test be conducted of the source in accordance with the following conditions:

- a. **General Test Methods.** Use approved EPA methods from 40 CFR parts 51, 60, 61 and 63 (in effect on July 1, 2010), or approved procedures contained in “*Source Test Manual – Procedures for Compliance Testing*,” state of Washington, Department of Ecology, as of September 20, 2004, on file at Ecology. The operator of the source shall be required to provide the necessary platform and sampling ports for Ecology personnel or others to perform a test of an emissions unit. Ecology shall be allowed to obtain a sample from any emissions unit. The operator of the source shall be given an opportunity to observe the sampling and to obtain a sample at the same time. [WAC 173-400-105(4)]
- b. **Appropriate Testing Facilities.** When requested by ORCAA, the permittee is required to provide an appropriate source testing platform and sampling ports.

[*Local Only*: ORCAA 1.5(j)]

**M8. Fugitive Emissions and Dust Control Monitoring.** The permittee shall devise and implement a fugitive emissions control plan that assures that reasonable and appropriate precautions for preventing fugitive emissions and fugitive dust are implemented. The plan shall be made available for inspection by ORCAA upon request and shall include identification and brief description of the precautions for preventing fugitive emissions and fugitive dust. [WAC 173-401-615(1)(b)]

**M9. Compliance Assurance Monitoring.** The permittee shall implement a Compliance Assurance Monitoring Plan for EU3 consistent with 40 CFR Part 64, Compliance Assurance Monitoring, as follows:

- a. Monitoring Indicators. The permittee shall monitor operating indicators as specified in Table M.1 below whenever subject emissions units are operating [§64.7(a)].
- b. Exemptions. The permittee is temporarily exempted from a monitoring requirement of this condition when the associated monitoring system is inoperable either due to an unavoidable breakdown or malfunction, or due to a routine scheduled repair or calibration check as specified in Table M.1. In determining whether a monitoring system malfunction or breakdown was unavoidable, the following criteria shall be considered:
  - i. Whether the malfunction was caused by poor or inadequate operation, maintenance, or any other reasonably preventable condition;
  - ii. Whether the malfunction was of a recurring pattern indicative of inadequate operation or maintenance; and
  - iii. Whether the permittee took appropriate action as expeditiously as practicable to correct the malfunction.

[§64.7(c)]

- c. Definition of Excursion. Except during startup or shutdown of the subject emission unit, any occurrence when operation of the emission unit fails to meet any of the target operating ranges specified in Table M.1 below will constitute an excursion if the out-of-range indicator can not be brought back into conformance with its target operating range or condition within 24-hours from the time the out-of-range operation was first noted or recorded [§64.6(c)(2)].
- d. Quality Improvement Plan (QIP) Required. Based on results of a notification by the permittee of the need for improved monitoring, as required under condition R12, the permitting authority or the Administrator may require the permittee to develop and implement a Quality Improvement Plan (QIP) in accordance with §64.8 of 40 CFR Part 64  
[40 CFR Part 64, §64.8].

**TABLE M.1: CAM Indicators**

Emission Unit Indicator [§64.3(a); §64.6(c)(1)(i)]	Target Operating Ranges and Conditions [§64.3(a); §64.6(c)(1)(i)]	Monitoring Means [§64.3(a); §64.6(c)(1)(ii)]	Monitoring Frequency [§64.3(a); §64.6(c)(1)(i)]	Performance Requirements [§64.3(b); §64.6(c)(1)(iii)]
Planer Baghouse – Pressure Drop	0.5” – 5.0” w.c.	Manometer	Once per shift	Manometer maintained in accordance with the O&M plan required under condition AR3.4

[WAC 173-401-615(1)(b); 40 CFR Part 64]

**M10. Kiln Temperature Monitoring.** The following applies:

- a. Drying temperatures in each kiln shall be monitored continuously. [WAC 173-401-615(1)(a); 15ADM1089, Condition #4]
- b. Temperature sensors shall be maintained and positioned to accurately monitor drying temperatures in accordance with the Operation and Maintenance plan required by condition AR 2.4. [WAC 173-401-615(1)(b)]

## VIII. RECORDKEEPING

The following record keeping requirements apply facility wide unless otherwise specified.

**RK1. Retention and Availability of Records.** The permittee shall maintain all records required by this permit. All required records shall be retained for at least 5 years from the origination date and shall be available for inspection by ORCAA upon request.  
[WAC 173-401-615(2)(c); §60.48c(i)]

**RK2. Record of Changes.** The permittee shall maintain records describing changes made that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.  
[WAC 173-401-615 (2)(b); WAC 173-401-724(5)]

**RK3. Monitoring Records – General Requirements.** The permittee shall keep records of required monitoring and testing including, where applicable, the following:

- a. The date, location, and time of sampling or measurement;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

[WAC 173-401-615(2)(a)]

**RK4. Record of Permit Deviations.** The permittee shall maintain a contemporaneous record of all permit deviations.  
[WAC 173-401-615(3)(b); §64.9(b)(2)]

**RK5. Availability of Emissions Records.** Emission records required by this permit shall be made available to ORCAA upon request.

[*Local Only*: ORCAA 8.11(b)]

**RK6. Emissions Records.** The permittee shall maintain records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards.

[WAC 173-400-105(1); *Local Only* ORCAA 8.11(a)]

**RK7. Unlawful Reproduction or Alteration of Documents.** No person shall reproduce or alter, or cause to be reproduced or altered, any order, registration certificate or other paper issued by ORCAA if the purpose of such reproduction or alteration is to evade or violate any applicable requirement.

[*Local Only*: ORCAA 7.3]

**RK8. Display of Orders, Certificates and Other Notices.** Any order required by ORCAA Regulations shall be available on the premises designated on the order. In the event that ORCAA requires a notice to be displayed, it shall be posted.

[*Local Only*: ORCAA 7.4]

**RK9. Record of Complaints.** The permittee shall keep a record of air quality related complaints received, the assessment of the validity of each complaint, and what, if any, corrective action was taken in response to the complaint. Records shall include, if available or provided, the following information:

- a. Description of the complaint.
- b. Date and time the alleged impact was first noticed.
- c. Date and time the alleged impact was last noticed.
- d. Location where the alleged impact was experienced.
- e. Name and phone number of caller.
- f. The permittee's assessment of the validity of the complaint.
- g. Description of any corrective action taken.

[WAC 173-401-615(2)(a)]

**RK10. Record of Actions Taken to Maintain Air Pollution Control Equipment.** The permittee shall keep a record of major maintenance actions taken to maintain air pollution control equipment in good operating condition and repair. Records shall include:

- a. Date and time the action commenced;
- b. Description of the action;
- c. Description of outcome or findings;
- d. Date and time the action was completed;
- e. Name of person or company performing the maintenance; and
- f. Duration of time the subject equipment was not operational.

[WAC 173-401-615(2)(a)]

**RK11. MACT Applicability Records.** For each relevant standard or other applicable requirement under 40 CFR Part 63, which the permittee determines inapplicable, the permittee shall keep record of the applicability determination on site for five years after the determination, or until the source changes its operations to become an affected source, whichever comes first. For the purposes of this condition, a relevant standard is defined as any standard for which:

- a. The source emits or has the potential to emit (without considering controls) one or more hazardous air pollutants regulated by the standard; and,
- b. The source belongs to the source category regulated by the standard.

The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) shall be sufficiently detailed to allow ORCAA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If required, the analysis shall be performed in accordance with requirements established in the relevant subpart for this purpose, and the analysis should be performed in accordance with EPA guidance materials published to assist sources in making applicability determinations under section 112, if any.

[§63.10(b)(3)]

**RK12. Copies of Required Approval Orders and Operation and Maintenance Plans.** The permittee shall maintain on site all approval orders from ORCAA and all required operation and maintenance plans for air pollution generating equipment and air pollution control equipment.

[01NOC192, Condition #6; 02NOC268, Condition #6; 04NOC392, Condition #6]

**RK13. Record Keeping (15ADM1089):** SPI shall maintain the following records and make them available to ORCAA upon request:

- a. Monthly and running 12-month quantities in thousand board feet (Mbf) of dimensional green lumber produced;
- b. Monthly and running 12-month quantities in thousand board feet (Mbf) of dimensional kiln-dried lumber produced by species;
- c. Monthly and running 12-month quantities in undiluted gallons of anti-mold solution used;
- d. Kiln temperature exceedance events, including the time and date of discovery of the exceedance, actions taken, and resolution.

[15ADM1089, Conditions #2 & #5]

**RK14. Records Required for Greenhouse Gas (GHG) Reporting.** If the permittee is required to prepare annual GHG reports to Ecology pursuant to Chapter 173-441 WAC, the permittee shall maintain records in accordance with WAC 173-441-050, retaining, at a minimum, the following:

- a. A list of all units, operations, processes, and activities for which GHG emissions were calculated.
- b. The data used to calculate the GHG emissions for each unit, operation, process, and activity, categorized by fuel or material type.
  - 1) These data include, but are not limited to, the following information: The GHG emissions calculations and methods used, as required by WAC 173-441-120.
  - 2) Analytical results for the development of site-specific emissions factors.
  - 3) The results of all required analyses for high heat value, carbon content, and other required fuel or feedstock parameters.
  - 4) Any facility operating data/process information used for the GHG emission calculations.
- c. Copies of the annual GHG reports.
- d. Missing data computations. For each missing data event, also retain a record of the cause of the event and the corrective actions taken to restore malfunctioning monitoring equipment.
- e. The GHG Emissions Monitoring Plan required by condition M5.
- f. The results of all required certification and quality assurance tests of continuous monitoring systems, fuel flow meters, and other instrumentation used to provide data for the GHGs reported under this chapter.
- g. Maintenance records for all continuous monitoring systems, flow meters, and other instrumentation used to provide data for the GHGs reported under this chapter.

[*State only*: WAC 173-441-050(6)]

**RK15. Paperless Records.** Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

[§64.9(b)(2)]

### ***Additional Records Required for the Package Boiler***

The following record keeping requirements only apply to the boiler (EU1).

**RK16. Records of Startup, Shutdown, and Malfunction of the Package Boiler:** Any owner or operator shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility.

[§60.7(b); §63.10(b)(2)]

**RK17. Fuel Consumption in the Boiler:** The owner or operator shall maintain monthly records, including fuel purchase receipts, of the fuel consumption in the package boiler. [01NOC192, Condition #5; §60.48c(g)]

**RK18. Boiler Records.** Required boiler records must be in a form suitable and readily available for expeditious review and must be retained for a minimum of 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. Boiler records must be kept on-site, or they must be accessible from on-site, for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche. The following compliance records are required for the boiler at the facility as specified:

- a. Records of all required maintenance performed on the air pollution control and monitoring equipment;
- b. All documentation supporting initial notifications and notifications of compliance status;
- c. Records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations  
[§63.10, §63.7555(a), § 63.7560(a-c)]

**RK19. Records of Boiler Maintenance:** The permittee shall maintain records related to package boiler maintenance required by Condition AR1.5 containing at least the following information:

- a. The concentrations of CO in the effluent stream in parts per million by volume dry basis and oxygen in percent dry basis measured before and after the adjustments of the boiler.
- b. A description of any corrective actions taken as a part of the combustion adjustment or tune-up.
- c. The type and amount of fuel used over the 12 months prior to the annual adjustment, but only if the unit is physically and legally capable of using more than one type of fuel during that period.  
[§63.52(f); §63.10(b)(2)(vii)]

### ***Additional Records Required for the Spray Coating System***

The following record keeping requirements only apply to the spray coating system (EU4).

**RK20. VOC-Containing Material Use.** The owner or operator shall maintain records of the amounts of coatings used. Records shall be updated monthly and shall be sufficient to verify the actual, cumulative amount of VOC-containing materials used. Records shall include the following:

- a. Purchase invoices indicating the amount of VOC-containing materials purchased, date of purchase, and corresponding product identification numbers;

- b. Actual cumulative use of VOC-containing materials in terms of gallons per month; and,
  - c. Safety Data Sheets (SDS) for all VOC-containing materials used.
- [02NOC268, Condition #2]

## IX. REPORTING

The following reporting requirements apply plant wide.

**R1. Certification of Reports.** All reports, including any test results, monitoring results, applications, emissions inventories, equipment malfunction reports or compliance reports, submitted to ORCAA or the U.S. Environmental Protection Agency Region 10 (EPA) under requirements of this permit, shall be certified as being true, accurate, and complete by a responsible official. Such certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete. Provided, however, where a report is sent more frequently than once every 6 months, the responsible official's certification need only be submitted once every 6 months, covering all required reporting since the date of the last certification.  
[WAC 173-401-520; WAC 173-401615(3)(a); WAC 173-401-630(1); §63.2520(e)(2)]

**R2. Annual Compliance Certification.** The permittee shall annually submit to ORCAA and to the U.S. Environmental Protection Agency Administrator, in care of Region 10 of the U.S. Environmental Protection Agency (EPA), an Annual Compliance Certification (ACC) report which shall certify the status of compliance with respect to all permit conditions during the previous 12-month period. An ACC shall be submitted to ORCAA and EPA on or before July 30 of each year and shall cover monitoring operations over the previous calendar year (July 1 through June 30). ACC reports shall certify the status of compliance continuously over the reporting period, and the reporting period shall not exceed 12 months from the end of the reporting period covered in the previous report. The reports shall be certified by a responsible official in accordance with condition R1. ACC reports shall include:

- a. Identification of each term or condition of the permit that is the basis of the certification.
- b. Certification of the status of compliance with each term or condition of the permit and whether compliance was continuous or intermittent over the reporting period.
- c. Identification of the method(s) or other means used by the permittee for determining the compliance status, and whether such methods or other means provide continuous or intermittent data.

[WAC 173-401-630(5)]

**R3. Confidential Information.** Records or other information submitted to ORCAA, that are considered by the permittee to be proprietary and confidential, shall be only for the confidential use of ORCAA provided that:

- a. The information relates to processes or production unique to the permittee or are likely to affect adversely the competitive position of the permittee if released to the public or to a competitor; and,
- b. The permittee certifies the proprietary and/or confidential nature of the records or information.

[*Local Only*: ORCAA 1.6]

**R4. Semi-Annual Monitoring Reports.** Unless a shorter time period is specified in this permit, a semi-annual monitoring report (SAMR) summarizing results of monitoring conducted during a continuous 6 month period shall be submitted on or before January 30 and July 30 of each year. SAMRs submitted by January 30 shall cover, at a minimum, monitoring operations over the previous July 1 through December 31. SAMRs submitted by July 30 shall cover, at a minimum, monitoring operations over the previous January 1 through June 30. SAMRs shall include a summary of all monitoring conducted in accordance with Section VII of this permit, and shall include the following as applicable:

- a. A statistical summary of results of required monitoring conducted over the reporting period;
- b. Identification and characterization of all instances of deviations from permit requirements;
- c. Summary description of any corrective actions taken to maintain air pollution controls identified in Table M.1;
- d. Summary information on the number, duration and cause (including unknown cause, if applicable) of downtime of any manometer or kiln temperature monitors required by this permit (other than downtime associated with daily calibration checks, if applicable); and,
- e. The information specified in Table 9 of 40 CFR Part 63, Subpart DDDDD, which requires:
  - 1) If the facility is subject to the requirements of a tune up you must submit a compliance report with the information in paragraphs (c)(5)(i) through (iii), (xiv) and (xvii) of this section,
    - (c)(5)(i). Company and Facility name and address.
    - (ii). Process unit information, emissions limitations, and operating parameter limitations.
    - (iii). Date of report and beginning and ending dates of the reporting period.
    - (xiv). Include the date of the most recent tune-up for the package boiler. Include the date of the most recent burner inspection if it was not done annually, biennially, or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown.
    - (xvii). Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
  - 2) A statement that there were no deviations from the emission limitations and work practice standards during the reporting period.

- f. If required, a description of the actions taken to implement a Quality Improvement Plan (QIP) during the reporting period pursuant to condition M9.e. Monitoring reports shall be submitted to ORCAA no later than 30 days after the end of the reporting period and shall be certified by a responsible official in accordance with Condition R1.

[WAC 173-401-615(3)(a); §64.9(a); WAC 173-401-615(1)(a)]

**R5. Reporting Deviations from Permit Conditions.** The permittee shall promptly report any deviations from permit conditions, including those attributable to upset conditions as defined in this permit. The following conditions shall apply:

- a. **Prompt Reporting.** For purposes of this permit, submitting a report “promptly” means the following:
  - i. **Potential Threat to Human Health or Safety:** If the deviation presents a potential threat to human health or safety, “promptly” means as soon as possible but no later than 12 hours after discovery of the deviation;
  - ii. **Other Deviations:** For other deviations, “promptly” means as soon as possible but no later than 30 days after the end of the month during which the deviation was discovered.
- b. **Deviation Report Content.** Permit deviation reports shall describe the probable cause of such deviations, corrective actions taken or planned, and preventive measures taken.
- c. **Reporting Unavoidable Excess Emissions.** The deviation report may include demonstration that excess emissions were unavoidable due to start-up, shutdown or upset conditions consistent with the requirements of condition P18.
- d. **Reporting Deviations due to Emergencies.** The deviation report may include demonstration that excess emissions were due to an emergency, consistent with the requirements of condition P17.

[WAC 173-401-615(3)(b); WAC 173-400-107(3); WAC 173-401-645; WAC 173-401-615(1)(a) ]

**R6. Notification of Control Equipment Malfunction.** The permittee shall notify ORCAA of malfunctions of pollution control equipment identified in Table M1 when repairs cannot be completed within 24 hours. For purposes of this notification, the term “malfunction” shall mean that the control equipment is inoperable, or cannot maintain operation within the prescribed operating conditions specified in Table M1. The notification shall be made within two working days from the time the malfunction was discovered and shall include a description of the malfunction and any corrective actions taken or planned. The notification shall be made by facsimile, e-mail, or in writing. However, if the notification is made by facsimile or e-mail, the permittee shall also submit a written notice within 10 working days of the occurrence.

[WAC 173-401-615(3)]

**R7. Notification of Complaint Received.** The permittee shall notify ORCAA of any complaint received within 48 hours of the time when the complaint or allegation was received. The notification shall include a short description of the complaint, time it was received, actions taken, actions planned and preliminary assessment. The notification shall be made by facsimile, e-mail, or in writing. However, if the notification is made by facsimile or e-mail, the permittee shall also submit a written notice within 10 working days of the occurrence.  
[WAC 173-401-615(2)]

**R8. Annual Inventory Report.** No later than March 1st of each year, the permittee shall submit an inventory of the actual amount of pollutants emitted during the previous calendar year. The inventory shall be submitted to ORCAA on standard inventory reporting forms and shall be accompanied by associated calculations, data or other information used in calculating the reported emissions. A request for extension may be considered if a request from the Responsible Official is received by ORCAA prior to February 25th. The request must include a statement of the unexpected circumstances that occurred, how this affects your ability to submit the report on time, and the number of additional days needed.  
[WAC 173-400-105(1); ORCAA 8.11; WAC 173-401-615(1)(a)]

**R9. Notification of Performance Testing:** The following notifications and plans must be submitted by the due dates specified to ORCAA and, if the emissions unit to be tested is a boiler, the Administrator:

- a. **Notification of performance testing.** The owner or operator of an affected source shall notify the Administrator in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin to allow the Administrator to review and approve the site-specific test plan required under §63.7(c), if requested by the Administrator, and to have an observer present during the test.
- b. **Delay of performance testing.** In the event the permittee is unable to conduct the performance test on the date specified in the Notification of Performance Testing due to unforeseeable circumstances beyond the permittee's control, the permittee must provide notification as soon as practicable and prior to the scheduled performance test date specifying the date when the performance test is rescheduled. In the case of a boiler, this notification of delay in conducting the performance test shall not relieve the permittee of legal responsibility for compliance with any other applicable provisions of 40 CFR Part 63.
- c. **Site-specific Stack Test Plan:** Before conducting a required performance test, the permittee shall develop and, if requested by ORCAA or the Administrator, shall submit a site-specific test plan to ORCAA and the Administrator for approval. The site-specific test plan shall be in accordance with requirements in §63.7520(a) and §63.7(c)(2)(i), and shall include a test program summary, the test schedule, data quality objectives, and both an internal and external quality assurance (QA) program in accordance with §63.7(c).

[WAC 173-401-630(1); §63.9(e)]

- R10. Reporting Results of Performance Testing:** The permittee shall report results of any performance tests to ORCAA within 45 days after completion of the performance test. The report shall include:
- a. A description of the source and sampling location;
  - b. The time and date of the test;
  - c. A summary of results, reported in units and for averaging periods consistent with the applicable emission standard;
  - d. A description of the test methods and quality assurance procedures used;
  - e. The amount of fuel burned and/or raw material processed by the source during the test;
  - f. The operating parameters of the source and control equipment during the test; and,
  - g. Field data and example calculations.

If the emissions unit tested was a boiler, the following is required:

- h. Test results shall also be submitted to the Administrator;
- i. Reports shall include results from any associated fuel analyses;
- j. The reports for all performance tests must include all applicable information required in §63.7550 (as covered in R15).

[WAC 173-401-630(1); WAC 173-401-615(1)(a); §63.7515(d); §63.7550]

- R11. State Greenhouse Gas (GHG) Reporting.** The permittee shall be subject to the requirement to report greenhouse gas (GHG) emissions to Ecology in accordance with Chapter 173-441 WAC if annual facility-wide emissions of carbon dioxide equivalents (CO<sub>2</sub>e) are 10,000 metric tons per year or more from all source categories listed in WAC 173-441-120. The following requirements shall apply:
- a. Once the facility emits 10,000 metric tons of GHGs or more per calendar year, the permittee shall report emissions of GHGs to Ecology annually thereafter unless the permittee is allowed to discontinue reporting as allowed by WAC 173-441-030(5) and the specified notice is submitted to Ecology.
  - b. To calculate GHG emissions, the permittee shall include all GHGs listed in Table A-1 of WAC 173-441-040, including those emitted from the combustion of biomass, using equation A-1 from WAC 173-441-030(1)(b)(iii).
  - c. Reports must meet the requirements of WAC 173-441-050, and include the annual emissions of the GHGs listed in WAC 173-441-040 from source categories listed in WAC 173-441-120.
  - d. The annual GHG report shall be submitted electronically in accordance with the requirements of WAC 173-441-050 and 173-441-060 and in a format specified by Ecology.
  - e. GHG emissions reports are due to Ecology:
    - i. No later than March 31 of each calendar year for GHG emissions in the previous calendar year for facilities required to report GHG emissions to the EPA under 40 C.F.R. Part 98;
    - ii. No later than October 31<sup>st</sup> of each calendar year for GHG emissions in the previous calendar year for facilities not required to report GHG emissions to the EPA under 40 C.F.R. Part 98.

- f. All requests, notifications, and communications to Ecology pursuant to GHG emissions reporting, other than submittal of the annual GHG report, shall be submitted to the following address:
  - Greenhouse Gas Report
  - Air Quality Program
  - Department of Ecology
  - P.O. Box 47600
  - Olympia, WA 98504-7600
- g. The permittee shall submit a revised annual GHG report within 45 days of discovering that an annual GHG report previously submitted contains one or more substantive errors. A substantive error is an error that impacts the quantity of GHG emissions reported or otherwise prevents the reported data from being validated or verified. The revised report must correct all substantive errors.
- h. Ecology may notify the permittee in writing that an annual GHG report previously submitted contains one or more substantive errors. Such notification will identify each such error. The permittee shall, within 45 days of receipt of the notification, either resubmit the report that, for each identified substantive error, corrects the identified substantive error (in accordance with the applicable requirements of this permit) or provide information demonstrating that the previously submitted report does not contain the identified substantive error or that the identified error is not a substantive error.

[Chapter 173-441 WAC: *State Only*]

**R12. Notification of Need for Improved Monitoring of Emissions Units Subject to CAM (Quality Improvement Plan):** With respect to emissions units subject to CAM, if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify ORCAA and, if necessary, submit a proposed permit modification application to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[§64.7(e)]

**R13. Reporting Excess Emissions:** Excess emissions shall be reported to ORCAA as soon as possible and within 24 hours. It shall be the burden of SPI to prove that excess emissions were unavoidable consistent with WAC 173-400-107(4) – (6) and ORCAA Rule 8.7(c).  
[15AMD1089 Condition 8; Chapter 173-400-107 WAC; ORCAA 8.7(c)]

### ***Additional Reporting Requirements for the Boiler***

The following reporting requirements apply only to the Boiler (EU1).

**R14. Notification Requirements:** A copy of the annual boiler tune-up compliance report shall be submitted to the appropriate Regional Office of the EPA (to the attention of the Director of the Division indicated in the list of the EPA Regional Offices in §63.13) and to ORCAA. The boiler tune-up compliance report shall be submitted with the semi-annual compliance report described in Condition R4 Semi-Annual Compliance Certification.  
[§ 63.9(a)(4)(i), §63.10 (a)(4), § 63.7550(b)]

**R15. Annual Boiler Tune-Up Compliance Reporting:** By January 31 each year, you must submit a compliance report with:

- a. Company and Facility name and address.
- b. Process unit information, emissions limitations, and operating parameter limitations.
- c. Date of report and beginning and ending dates of the reporting period (January 1- December 31 of the previous year).
- d. Date of the most recent tune-up.
- e. The date of the most recent burner inspection.
- f. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

[§ 63.7550(a,c)]

**R16. One-Time Requirement for Notice of Compliance Statement (NOCS) and**

**Compliance Demonstration:** You must complete the initial compliance demonstration by submitting a NOCS by the close of business on the 60th day following the completion of all performance test and/or other initial compliance demonstrations for all boiler or process heaters at the facility according to §63.10(d)(2). The NOCS must include:

- a. Documentation for the most recent tune-up from AR1.6
- b. Documentation for the one-time energy assessment specified in Item 4 of Table 3 to Subpart DDDDD.
- c. A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit to comply with this subpart, description of the fuel(s) burned, including whether the fuel(s) were a secondary material determined by you or the EPA through a petition process to be a non-waste under §241.3 of this chapter, whether the fuel(s) were a secondary material processed from discarded non-hazardous secondary materials within the meaning of §241.3 of this chapter, and justification for the selection of fuel(s) burned during the compliance demonstration.
- d. In addition to the information required in §63.9(h)(2), your notification of compliance status must include the following certification(s) of compliance, as applicable, and signed by a responsible official:
  - (i) "This facility completed the required initial tune-up for all of the boilers and process heaters covered by 40 CFR part 63 subpart DDDDD at this site according to the procedures in §63.7540(a)(10)(i) through (vi)."
  - (ii) "This facility has had an energy assessment performed according to §63.7530(e)."

[§ 63.9(h), § 63.7510(e), § 63.7530(e), § 63.7530(f), § 63.7545(e)(1,8)]

## X. PERMIT SHIELD CONDITIONS

S1. **Permit Shield.** Compliance with a permit condition shall be deemed compliance with the applicable requirements upon which that condition is based, as of the date of permit issuance. The permit shield does not apply to any insignificant emissions units or activity designated under WAC 173-401-530.

[WAC 173-401-640(1)]

S2. **Inapplicable or Exempt Requirements.** The requirements shown in Table 10.1, as of the date of permit issuance, have been determined not to apply to the corresponding emissions units indicated due to either inapplicability of the requirement or an exemption. Commencing the date of permit issuance, the AOP shield shall cover the requirements specified in Table 10.1 with respect to the specific emissions units indicated unless applicability of the requirement is triggered by a future action or emissions increase.

[WAC 173-401-640]

S3. **Exclusions.** 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, or
- e. The ability of the permitting authority to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in chapter 252, Laws of 1993.

[WAC 173-401-640]

## Attachment 1

**Table A.1 Requirements Determined Inapplicable or Exempt**

Requirement	With Respect to:	Exempt or Inapplicable	Brief Description of Requirement	Basis
40 CFR 60 Subpart D	Boiler (EU1)	Inapplicable	Standards for performance for fossil-fuel fired generators for which construction is commenced after August 17,1971	For wood fired boilers, 40 CFR § 60.40(a) defines the affected facility as each fossil-fuel and wood residue fired steam generating unit capable of firing fossil fuel at a heat input rate of more than 250 MMBtu/hr. The boiler has a maximum design heat rates of 40 MMBtu/hr. Therefore, the boiler covered under this permit is not subject to 40 CFR Part 60, Subpart D.
40 CFR 60 Subpart Da	Boiler (EU1)	Inapplicable	Standards of performance for Electric Utility Steam Generating Units for which construction, modification, or reconstruction is commenced after September 18, 1978.	Subpart Da applies to electric utility steam generating units capable of combusting more than 250 MMBtu/hr heat input of fossil fuel, either alone or in combination with any other fuel. EU1 is a natural gas fired package boiler with a maximum rated heat input capacity of 40 MMBtu/hr. Therefore Subpart Da does not apply.
40 CFR 60 Subpart Db	Boiler (EU1)	Inapplicable	Standards of performance for Industrial-Commercial-Institutional steam generating units for which construction, modification, or reconstruction is commenced after June 19, 1984.	Subpart Db applies to steam generating units with a heat input capacity greater than 100 MMBtu/hr. EU1 is a natural gas fired package boiler with a maximum rated heat input capacity of 40 MMBtu/hr. Therefore Subpart Db does not apply.
40 CFR 63 Subpart QQQQ	Spray application system for wood brighteners and fungicides (EU 4)	Inapplicable	National Emission Standards for Hazardous Air Pollutants for Surface Coating of Wood Building Products	The lumber produced at the mill does not meet the description of wood building products in the standard.
40 CFR 72 - 78	Facility	Inapplicable	Permits for acid rain program	The facility is not listed as a subject facility in Tables 1, 2, or 3 of § 73.10.

**Table A.1 *continued***

Requirement	With Respect to:	Exempt or Inapplicable	Brief Description of Requirement	Basis
ORCAA Regulation 4	Facility	Exempt	Annual Registration required for listed sources, excluding those sources subject to the operating permit program pursuant to Title V.	The facility is subject to the operating permit program and, therefore, exempt from registration.
ORCAA 8.4	Boiler (EU1)	Inapplicable	Requirements and prohibitions for operation of incinerators.	Per the definitions in Rule 1.4, none of the boilers meet the definition of an incinerator.
Chapter 173-400-040(3)(b) WAC	Facility	Inapplicable	Emission unit identified as a significant contributor to nonattainment must use reasonable and available control methods to control emission of contaminants for which the area is designated nonattainment	No emission units at the facility have been identified as a significant contributor to nonattainment.
Chapter 173-400-040(8)(b) WAC	Facility	Inapplicable	Fugitive dust sources identified as significant contributors to PM <sub>10</sub> nonattainment must apply RACT	The facility is not located in a PM <sub>10</sub> nonattainment area.
Chapter 173-400-050(2) WAC	Facility	Inapplicable	Incinerator carbonyl emission limit of 100 ppmv total carbonyls	The facility does not include any incinerators.
Chapter 173-400-070(1) WAC	Facility	Inapplicable	Emission standards for wigwam burners	The facility does not operate a wigwam burner
Chapter 173-400-070(1)-(7) WAC	Facility	Inapplicable	Emission standards for certain source categories	The facility does not operate an orchard heater, grain elevator, catalytic cracking unit, or sulfuric acid plant.
Chapter 173-400-091 WAC	Facility	Inapplicable	Voluntary limits of emissions	No request for voluntary emissions limits below BACT
Chapter 173-400-100 WAC	Facility	Exempt	Annual Registration required for regulated minor sources, excluding those sources subject to the operating permit program pursuant to Title V.	The facility is subject to the operating permit program and, therefore, exempt from registration.
Chapter 173-400-105(5)(a) WAC	Boiler (EU1)	Exempt	Continuous opacity, sulfur dioxide, and percent oxygen monitoring requirements for fossil fuel fired steam generators. Exemption for boilers with capacity less than 250 million Btu per hour	Boiler (EU1) has heat input capacity less than 250 MMbtu/hr.
Chapter 173-400-105(5)(d) WAC	Boiler (EU1)	Inapplicable	Continuous opacity monitoring requirements or wood fired boilers greater than 100 million Btu heat input capacity	Boiler does not burn wood residuals.
Chapter 173-400-105(5)(d) WAC	Boiler (EU1)	Exempt	Continuous opacity monitoring requirements or wood fired boilers greater than 100 million Btu heat input capacity	Boiler is 40 MM Btu/hr and doesn't fire wood.

**Table A.1 *continued***

<b>Requirement</b>	<b>With Respect to:</b>	<b>Exempt or Inapplicable</b>	<b>Brief Description of Requirement</b>	<b>Basis</b>
Chapter 173-400-105(6) WAC	Facility	Inapplicable	Applies to sources that are not subject to the operating permit program	The facility is subject to the operating permit program.
Chapter 173-490 WAC	Facility	Inapplicable	Emissions standards for sources emitting VOCs	This chapter applies to specified emission sources of VOCs located in or operating within designated ozone nonattainment areas of the state of Washington. Since Grays Harbor County is not nonattainment of the ambient ozone standard, this regulation does not apply.
Chapter 173-433 WAC	Facility	Inapplicable	Solid fuel burning devices	This regulation is intended to apply to wood stoves and fireplaces only.
Chapter 173-434 WAC	Facility	Inapplicable	Standards for incinerator facilities	The facility does not operate an incinerator
Chapter 173-435 WAC	Facility	Inapplicable	Emergency episode plan requirements	The facility has not been requested to prepare such a plan.
Chapter 173-400-040(1)(d) WAC	Facility	Inapplicable	Alternative opacity limits	The facility does not have any alternative opacity limits.

Note: The requirements listed in Table A.1 include only those requirements for which inapplicability must be based on a determination or comparison of the size, age, emissions or other characteristic of an emission unit with respect to applicability criteria and threshold contained in the requirement. All other requirements are considered obviously inapplicable to the facility, and are not included in the table.

## Attachment 2

**Sierra Pacific Industries Aberdeen Lumber Mill**, located at **301 Hagara Street** in **Aberdeen**, Washington, is a **dimensional lumber mill**. The facility includes the emissions units and other pollutant emitting activities identified in Table A1 below and insignificant emissions units as defined in Table A2 below. More complete technical descriptions of these units and activities are contained in the associated Sierra Pacific Industries Aberdeen Lumber Mill's Technical Support Document.

**Table A2: Emissions Units**

ID	Description	Control	Established	Effective NOCs
EU1	Natural gas fired Babcock and Wilcox model 101-88B boiler rated at 40 MMBtu/hr	Good combustion practices	2003	01NOC192
EU2	Eight steam-heated double track lumber drying kilns	Steam management system, temperature limit	2003	06NOC490 11MOD861 15ADM1089
EU3	Planer mill pneumatic dust collection system, 50,440 acfm	Dual cyclones, baghouse (MAC #120MCF494)	2003	04NOC392
EU4	Spray application system for wood brighteners and fungicides	Squirrel cage mist eliminators, HAP-free coatings	2003	02NOC268
EU5	Diesel engine powering emergency fire pump	Ultra-low sulfur diesel and good combustion practices.	2011	N/A

## Attachment 3

**Table A3: Categorically Exempt, Insignificant Emissions Units  
Located at Sierra Pacific Industries Aberdeen Lumber Mill**

Chapter 173-401-532(3) WAC  
Lubricating oil storage tanks.

Chapter 173-401-532(4) WAC  
Storage tanks, reservoirs and pumping and handling stations of any size, limited to soaps, lubricants, hydraulic fluid, vegetable oil, grease, animal fat, aqueous salt solutions or other materials and processes using appropriate lids and covers where there is no generation of objectionable odor or airborne particulate matter.

Chapter 173-401-532(5) WAC  
Pressurized storage of oxygen, nitrogen, carbon dioxide, air, or inert gases.

Chapter 173-401-532(7) WAC  
Vehicle exhaust from maintenance and repair shops

Chapter 173-401-532(9) WAC  
Vents from rooms, buildings and enclosures that contain permitted emissions units or activities from which local ventilation, controls and separate exhaust are provided.

Chapter 173-401-532(10) WAC  
Internal combustion engines for propelling or powering vehicles

Chapter 173-401-532(12) WAC  
Welding equipment

Chapter 173-401-532(33) WAC  
Plant upkeep: including routine housekeeping, preparation for and painting of structures of equipment, retarring roofs, applying insulation to buildings in accordance with applicable environmental and health and safety requirements and paving or stripping parking lots.

Chapter 173-401-532(35) WAC  
Cleaning and sweeping of streets and paved surfaces.

Chapter 173-401-532(41) WAC  
Food preparation for human consumption

Chapter 173-401-532(42) WAC  
Portable drums and totes.

Chapter 173-401-532(43) WAC  
Lawn and landscaping activities

Chapter 173-401-532(45) WAC  
General vehicle maintenance including vehicle exhaust from repair facilities

Chapter 173-401-532(46) WAC  
Comfort air conditioning or air cooling systems, not used to remove air contaminants from specific equipment.

Chapter 173-401-532(49) WAC  
Office activities.

Chapter 173-401-532(51) WAC  
Sampling connections used exclusively to withdraw materials for laboratory analyses and testing.

Chapter 173-401-532(54) WAC  
Fuel and exhaust emissions from vehicles in parking lots

Chapter 173-401-532(55) WAC

Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, sintering or polishing: Ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood provided that:

- (a) Activity is performed indoors;
- (b) Particulate emission control in the immediate vicinity of the activity;
- (c) Exhaust from the particulate control is within the building housing the activity;
- (d) No fugitive particulate emissions enter the environment.

Chapter 173-401-532(86) WAC

Totally enclosed conveyors

Chapter 173-401-532(88) WAC

Air compressors, pneumatically operated equipment, systems and hand tools.

Chapter 173-401-532(89) WAC

Steam leaks.

Chapter 173-401-532(108) WAC

Vacuum systems exhausts.

Chapter 173-401-532(112) WAC

Chipping

Chapter 173-401-532(113) WAC

Debarking

### **Emissions Units Deemed Insignificant Because They Emit Only Fugitive Emissions Located at Sierra Pacific Industries Aberdeen Lumber Mill**

Chapter 173-401-530(1)(d) WAC

1. Chip/sawdust bin
2. Loadout of chips to trucks and barges
3. Log storage area
4. Incidental log trimming
5. Partially enclosed conveyors
6. Debarker
7. Screens
8. Chipper
9. Saws