



Sierra Pacific Industries – Lumber Mill TECHNICAL SUPPORT DOCUMENT

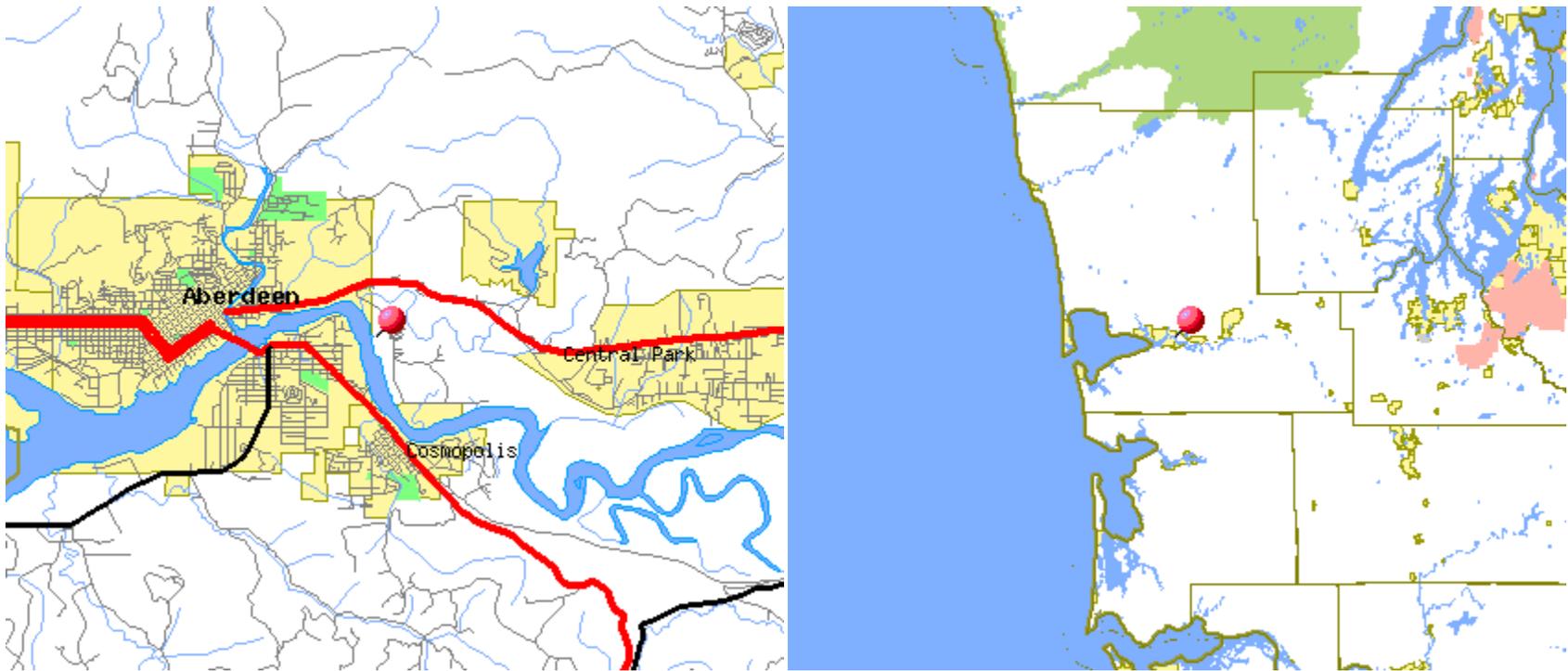
Olympic Region Clean Air Agency
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ISSUED IN ACCORDANCE WITH:
Chapter 173-401 WAC

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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Figures 1 & 2. Approximate locations of the Sierra Pacific Industries Aberdeen Lumber Mill
(Maps from Tiger Map, U.S. Department of the Census)

1.0 Disclaimer

This Technical Support Document (TSD) describes the history, equipment and operations at Sierra Pacific Industries – Lumber Mill (SPI) relevant to determining applicable air quality regulations and requirements. The information contained in this TSD is for purposes of background information only and is not directly enforceable. Air-related requirements pursuant to both the Federal Clean Air Act (FCAA) and Washington’s Clean Air Act (WACAA) are contained in SPI’s AOP and include emissions limits and associated monitoring, record keeping, and reporting requirements. All terms and conditions in SPI’s AOP are enforceable.

2. Facility Description

(SPI) owns and operates a lumber mill located on a 46-acre riverfront property in Junction City, Grays Harbor County, approximately 1.5 miles east of downtown Aberdeen and less than a mile across the Chehalis River from South Aberdeen and Cosmopolis. The lumber mill produces both kiln-dried and green lumber, as well as wood residual products such as chips and hog fuel, from western hemlock and Douglas fir.

Logs are delivered by truck where they are either fed to a debarker or stacked in organized decks for future use by an electric portal crane assisted by portable loaders. The debarker removes the bark from the logs, sends the logs to the sawmill, and conveys the bark to the hog. The hog reduces and homogenizes the size of the pieces of bark which are then sent to the fuel house for consumption in the cogeneration plant located in the southeastern portion of the property. The cogeneration plant, including the fuel house and cooling towers are regulated under their own permit (previously 04AOP358 and currently 12AOP873).

In the sawmill, logs are cut to appropriate lengths and sawed into rough dimensional lumber. Log pieces that are too short or otherwise unmarketable are chipped. After removal to chip piles, trucks or barges periodically remove chips and deliver them to off-site customers. Sawdust generated in the sawmill is collected and carried by covered conveyors to the fuel house.

Most of the dimensional lumber from the sawmill is delivered by forklift to the eight double-track dry kilns to be dried. The dry kilns can be heated by steam from the natural gas fired package boiler or from a separately permitted waste wood fired cogeneration plant. The remainder of the dimensional lumber is not dried and is sold as green lumber.

Whether green or dried, dimensional lumber is sent to the planer mill where it is sized and shaped for sale. Shavings and sawdust are collected from the planer and trim saw and controlled by a high efficiency cyclone followed by a reverse air baghouse. Wood residuals collected from the planer mill are sent to the fuel house.

Following the planer, all lumber is treated with water based coatings to promote brightness and resist mildew, mold, and decay during storage and transit. The spray chamber is located in the planer building and vents through an exhaust stack above the roofline. Coatings applied in the spray chamber are proprietary formulations prepared for SPI by Kop-Koat of Pittsburgh, PA. None of the coatings contain any hazardous air pollutants.

The majority of dimensional lumber delivered for sale is shipped by rail, although some is shipped by truck.

3.0 Emission Unit Descriptions

SPI's lumber mill consists of several insignificant emissions units and five significant emissions units: a natural gas fired package boiler, a set of double track dry kilns, a planer mill and associated dust collection system, an anti-mold spray system, and a diesel engine powering the emergency fire pump.

As a result of drying lumber in kilns, the mill is a major source of volatile organic compounds (VOC) as well as the hazardous air pollutants (HAP) methanol and acetaldehyde. The mill is also a minor source of the criteria pollutants carbon monoxide (CO), reactive oxides of nitrogen (NOx) and as a result, ozone (O₃), particulate matter less than 10 microns diameter (PM₁₀), particulate matter less than 2.5 microns in diameter (PM_{2.5}), sulfur dioxide (SO₂), and other HAPs. The mill also emits toxic air pollutants (TAPs) and total suspended particulates (TSP).¹ Combustion of natural gas in the package boiler results in the emission of the greenhouse gases carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O), which are implicated in global climate change.

Emission unit designations and brief descriptions are shown in Table 3.1.

Table 3.1: Emission 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

3.1 EU1: Natural Gas Fired Package Boiler

SPI maintains a Babcock and Wilcox, model 101-88B, natural gas fired boiler with a maximum rated heat input of 40 MMBtu/hr, capable of producing up to 32,000 lb/hr of steam at 300 °F and 50 psi. This boiler is subject to 40 CFR Part 60 Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units and best available control technology (BACT) standards for NOx and CO. An additional federal standard, 40 CFR Part 63 Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters), applies as well. The federal standards are discussed in more detail in Section 6.

¹ Hazardous air pollutants are listed in Section 112(b) of the Federal Clean Air Act Amendments of 1990. Toxic air pollutants are listed in Chapter 173-460 of the Washington Administrative Code.

The package boiler's potential to emit criteria pollutants is shown in Table 3.2. The package boiler's 100-year global warming potential is shown in Table 3.3. The package boiler is not a significant source of HAPs or TAPs.

Table 3.2: Package Boiler Criteria Pollutant Potential to Emit

POLLUTANT	EMISSION FACTOR (LB/MMBTU)	EMISSION FACTOR SOURCE	POTENTIAL TO EMIT (LBS/HR)	POTENTIAL TO EMIT (TPY)
NO _x	0.05	BACT	2.0	9
CO	0.05	BACT	2.0	9
SO ₂	0.006	AP-42	0.24	1
PM	0.0075	AP-42	0.30	1
VOC	0.0054	AP-42	0.216	1

PM from natural gas combustion is both PM₁₀ and PM_{2.5}.

Table 3.3: Package Boiler 100-Year Global Warming Potential

POLLUTANT	POTENTIAL ANNUAL EMISSIONS (LBS)	100-YEAR GLOBAL WARMING POTENTIAL (CO ₂ -EQUIVALENT TONS)
CO ₂	40,961,233	20,481
CH ₄	772.6	8
N ₂ O	77.3	12
Total	-	20,501

3.2 EU2: Dry Kilns

Dimensional lumber hewn from western hemlock and Douglas fir is dried in eight steam heated double track dry kilns. Drying wood can significantly increase its market value because dried lumber is easier to work than green lumber, has greater strength, is less prone to warping, checking, and other forms of deformation, and is more easily coated and painted.

When wood is heated in the kilns, VOCs – primarily terpenes, such as α -pinene and limonene – are released from the wood and emitted through the kiln vents. Some of these VOC compounds condense and form a haze of particulate matter when they reach ambient temperatures. Emissions of overall VOCs and condensable matter do not appear to be significantly affected by drying temperature.

In addition, heating wood to kiln temperatures causes non-destructive pyrolysis to occur, resulting in emissions of acetaldehyde, formaldehyde, methanol, and other HAPs. Formation, and therefore emissions, of these HAPs is strongly influenced by drying temperature. To limit emissions of HAPs, there is a BACT requirement to operate a computerized steam management system that maintains kiln temperatures at a maximum temperature of 200 °F.

Table 3.4 shows the potential to emit VOC, PM, and HAPs and TAPs from drying 315 MMbf/yr of softwood lumber at 200 °F. Where there are separate emission factors for western hemlock and Douglas fir, the factor resulting in higher emissions is used.

EPA does not include lumber drying in AP-42, the national clearinghouse for emission factors. Therefore, emission factors for the lumber kilns are the results of several studies, most of which

were funded by the Oregon Department of Environmental Quality (ODEQ). The emission factors for acetaldehyde, acrolein, formaldehyde, and methanol were developed by Dr. Michael Milota of Oregon State University and were included in memoranda to industry by ODEQ and EPA Region 10 in 2007.

Table 3.4: Lumber Dry Kiln Potential to Emit

POLLUTANT	CAS #	EMISSION FACTOR (LB/MMBF)	SOURCE	POTENTIAL TO EMIT (TPY)
PM	NA	89	ODEQ	14
VOC	NA	768	ODEQ	120
Total HAP	NA	0.20	ODEQ	32
Acetaldehyde	75-07-0	120	ODEQ	19
Acrolein	107-02-8	1.5	ODEQ	0.23
Formaldehyde	50-00-0	1.3	ODEQ	0.21
Methanol	67-56-1	81	ODEQ	13
Propionaldehyde	123-38-6	1.2	ODEQ	0.18

Acetaldehyde, acrolein, formaldehyde, and methanol are all both HAPs and TAPs, while Propionaldehyde is only a HAP. Condensable PM from the dry kilns is both PM₁₀ and PM_{2.5}.

3.3 EU3: Planer Mill

Trimming and planing of dried and green lumber results in generation of particulate matter that is collected by a pneumatic system controlled by dual, parallel high-efficiency cyclones and a reverse air baghouse. Collected particulate is sent to the fuel house through a covered mechanical conveyor system and burned in the cogeneration plant.

The baghouse, produced by MAC Equipment of Kansas City (Model #120NCF494), is fitted with polyester bags cleaned by reverse air. Air flow is induced by a fan produced by Industrial Air Technology Corporation powered by a 300 hp electric motor. SPI monitors pressure drop across the filters at least once per shift. Pressure drop typically falls between 1.0 and 3.5 inches of water. A pressure drop less than 0.5 inches of water or greater than 5.0 inches of water initiates investigation.

The baghouse is warranted not to exceed a maximum particulate loading of 0.005 gr/dscf if the baghouse is maintained as recommended. At this rate, the planer baghouse has the potential to emit 9.5 tons of PM₁₀ per year.

3.4 EU4: Spray Coating System

Concentrated coating solutions to promote brightness and resist mildew, mold, and decay during storage and transit are delivered already mixed by Kop-Koat and stored in a drum in the planer mill. A 100-gallon mix tank is used to dilute the solution about 50:1 by volume with water prior to use. According to MSDS from Kop-Koat, the undiluted mix contains 2.7 pounds of VOC per gallon and the formulation is HAP free. If applied to every single board foot of lumber currently permitted, and assuming that 100 percent of the VOC is emitted, spray coating has the potential to emit 12.0 tons of VOC per year.

Two spray bars, each 40 inches long by 37.5 inches wide, apply the dilute solution to planed lumber inside the spray box. The spray box is flanked at the infeed and outfeed by air chambers operated at negative pressure and the collected mist is vented to a squirrel cage type mist eliminator with an estimated control efficiency of 99.97% at 0.3 µm or larger droplet diameter. Collected mist is recycled.

Immediately following the spray box, lumber is graded, trimmed to length, and stacked for storage and delivery.

3.5 EU5: Fire Pump Engine

SPI uses a compression-ignition diesel engine to power their fire pump. The engine is exempt from new source review, but is included in the AOP as a significant emissions unit because there is applicable NESHAP standards.

Table 3.5 Fire Pump Engine

Intended Use	Manufacturer	Make/ Model Year	Rated BHP	Approximate Use
Fire Pump Engine	Clark Fire Pumps	1996	151	14 hours/ year

3.6 Insignificant Emission Units

In addition to the five emission units described in Sections 3.1 through 3.5, SPI's Aberdeen lumber mill includes the following emission units that are considered insignificant under WAC 173-401-530(1)(d) because they only generate fugitive emissions or under WAC 173-401-532 because they are categorically exempt.

These emissions units are exempt from permit program requirements and unit-specific monitoring, but are subject to ORCAA's general requirements including fugitive dust, opacity, grain loading standards, and nuisance odor regulations. Emission units exempt from permit program requirements may be fee eligible.

1. An approximately 270 foot by 980 foot log storage area
2. A portable debarker/ hog fuel grinder and associated engine
3. An enclosed sawmill
4. Enclosed conveyors transporting bark and sawdust to the fuel house
5. Enclosed conveyors transporting chips to barge and truck loadout
6. Chip piles
7. Loadout of chips to trucks
8. Loadout of chips to barges
9. Lubricating oil and hydraulic oil tanks
10. Storage of pressurized gas
11. Maintenance shops
12. Building vents
13. Vehicle internal combustion engines
14. Welding operations
15. Plant upkeep activities
16. Pavement cleaning and sweeping

17. Food preparation
18. Portable drums and totes
19. Landscaping activities
20. General vehicle maintenance
21. Comfort air conditioning
22. Office activities
23. Sampling connections
24. Parking lot exhaust
25. Indoor mechanical operations not resulting in emissions
26. Repair and maintenance activities
27. Totally enclosed conveyors
28. Air compressors and pneumatically operated equipment
29. Steam leaks
30. Vacuum system exhaust

3.7 Fee Eligible Emissions Units

ORCAA calculates annual fees for Title V sources (AOP fees) using a formula that includes a facility fee, a fee based on the number of emissions units, and a fee based on the actual amount of annual emissions. The intent of this formula is to relate AOP fees to ORCAA’s workload and the source’s air impacts. The formula used to calculate AOP fees is found in ORCAA Rule 3.2. The definition of *emission unit* found in ORCAA Rule 1.4 also applies. For SPI, fee eligible emission units include EU1-EU5.

4.0 Emissions

Actual annual emissions are reported to ORCAA annually by SPI. The following charts show SPI’s actual emissions for 2014.

Table 4.1 Actual Emissions- 2014

Pollutant	Tons/Year	Lbs/Year
PM (Total Particulate)	30.9	
PM-10 (Total Particulate) (<= 10 micrometers)	19.2	
PM 2.5 (Fine Particulate (<=2.5 micrometers)	10.7	
VOC as Volatile Organic Compounds	76.2	
SO2 (Sulfur Dioxide)	0.1	
NOX (Nitrogen Oxides)	0.4	
CO (Carbon Monoxide)	0.7	
Total HAP	19.7	
Acetaldehyde		22,683
Methanol		15,891
Formaldehyde		340
Acrolein		286
Propionaldehyde		214

Table 4.2 Facility-Wide Potential to Emit Criteria Pollutants

Emission Unit	Annual Potential to Emit in Tons				
	CO	NO _x	PM ₁₀	SO ₂	VOC
Package Boiler	8.8	8.8	1.3	1.0	0.9
Planer Mill			37.9		
Dry Kilns			8.0		94.5
Fungicide Spray					12.0
Fugitives			1.2		
Total	8.8	8.8	48.4	1.0	107.4

Table 4.3 Lumber Dry Kiln Potential to Emit

POLLUTANT	CAS #	EMISSION FACTOR (LB/MMBF)	SOURCE	POTENTIAL TO EMIT (TPY)
Acetaldehyde	75-07-0	113	ODEQ	17.8
Acrolein	107-02-8	1.60	ODEQ	0.25
Formaldehyde	50-00-0	1.24	ODEQ	0.20
Methanol	67-56-1	82	ODEQ	12.9

5.0 New Source Review Approvals

Table 5.1: Approval Orders

APPROVAL ORDER	DESCRIPTION
01NOC592	In May 2002, ORCAA granted SPI conditional approval to construct a lumber mill in Junction City, Grays Harbor County.
02NOC268	In December 2002, ORCAA granted SPI conditional approval to spray coat lumber with water-based fungicides.
04NOC347	In March 2004, ORCAA granted SPI unconditional approval to construct an eighth dry kiln. No increase in lumber production was included in the approval order.
04NOC392	In February 2005, ORCAA granted SPI conditional approval to replace the planer baghouse, which was under-designed and required frequent maintenance, with a higher capacity model.
06NOC490	In September 2006, ORCAA granted SPI conditional approval to install a ninth dry kiln and increase both kiln dried and total lumber production. As SPI did not install a ninth kiln within 18 months of approval, SPI may not construct an additional kiln without submitting a new NOC application.
06NOC520	In December 2006, SPI applied for approval to increase kiln temperatures from 180 °F to 200 °F and to increase lumber production. ORCAA issued a preliminary determination but final approval could not be granted because Ecology could not grant approval through a Tier 2 air toxics analysis. The permitting action is now closed.
11MOD861	On March 20, 2012, ORCAA granted conditional approval for SPI to raise the maximum kiln temperature from 180°F to 200°F.
15ADM1089	On June 22, 2015, ORCAA amended 11MOD861 by removing Condition 10, which set a limit on the amount of Formaldehyde SPI can emit. The eliminated condition was erroneously based on a draft Second Tier Analysis from Ecology that was never finalized.

Table 5.2 provides an assessment of applicability of conditions from all Approval Orders and references them to conditions in the AOP. When possible, conditions from the Approval Order have been streamlined (combined) with standard permit conditions and other applicable requirements. If part of an Approval Order condition is still applicable while part is not (e.g. if part of a condition only applies during initial startup), only the applicable part was incorporated into the AOP.

Table 5.2: Status of Conditions from Approval Orders

NSR Permit #	NSR Condition #	Description (For information only)	AOP Condition #
01NOC192 (Package Boiler)	1	Boiler NOx Limit: limits package boiler NOx emissions to 0.05 lb/MMBtu as determined by EPA Method 7E.	Condition AR 1.1
	2	Boiler CO Limit: limits package boiler CO emissions to 0.05 lb/MMBtu as determined by EPA Method 10A.	Condition AR 1.2
	3	Boiler Opacity Limit: limits package boiler opacity to 10% as determined by EPA Method 9, except during startup and shutdown.	Condition AR 1.3
	4	Baghouse Opacity Limit: limits opacity from the baghouse vent to 10% as determined by EPA Method 9.	Not Ongoing – superseded by Condition #4 from 04NOC392
	5	Fuel Requirements and Monitoring: allows only natural gas to be consumed in the package boiler and requires monthly records of fuel consumption to be maintained on site.	Conditions AR1.4 & RK17
	6	Recordkeeping: requires approval order, operation and maintenance plan, and natural gas consumption records to be maintained and made available on site.	Applicable Requirement Condition RK12
	7	NSPS Reporting: requires information provided to EPA Region 10 under the auspices of 40 CFR Part 60 Subparts A and Dc to be submitted to ORCAA as well.	Not Ongoing – Part 60 authority delegated to ORCAA.
	8	Sampling Ports: requires permanent sampling ports to be installed on the boiler stack meeting the requirements of 40 CFR Part 60 Appendix A, Method 1.	Not Ongoing – initial compliance specification
	9	Operation and Maintenance Plan: requires an operation and maintenance plan to be developed and implemented for the lumber mill and associated air pollution control equipment.	Applicable Requirement Condition PW 14
02NOC268 (Spray Coating System)	1	Material Use: allows only water-borne fungicide solutions to be applied by the spray coating system and requires SPI to receive approval from ORCAA before changing formulas.	Applicable Requirement Condition AR 4.1
	2	Material Use records: specifies records required to be kept regarding spray coating operations.	Applicable Requirement Condition RK 20
	3	Stack Specifications: requires spray system exhaust to be vented through an unobstructed, vertical stack above the roofline.	Applicable Requirement Condition AR 4.2
	4	Operation and Maintenance Plan: requires an operation and maintenance plan to be developed and implemented for all air pollution generating and associated control equipment.	Applicable Requirement Condition AR 4.3
	5	VOC Emissions: requires reasonable precautions to be taken to minimize VOC emissions.	Applicable Requirement Condition AR 4.4
	6	Required Records: requires material use records and O&M plan required by 02NOC268 to be maintained on site and made available to ORCAA.	Applicable Requirement Condition RK 12
04NOC347 (Eighth Dry Kiln)	None	NA	NA
04NOC392 (Planer Baghouse)	1	Previous Conditions: states that conditions from this Approval Order supersede previous conditions applied to the planer baghouse.	Not Ongoing – statement of intent.
	2	Stack Specifications: requires planer baghouse exhaust to be vented through an unobstructed, vertical stack above the roofline.	Applicable Requirement Condition AR 3.1
	3	Monitoring: requires installation of a visually accessible device to continuously monitor pressure drop across the baghouse filters.	Applicable Requirement Condition AR 3.2
	4	Baghouse Opacity Limit: limits opacity from the baghouse vent to 10% as determined by EPA Method 9.	Applicable Requirement Condition AR 3.3

NSR Permit #	NSR Condition #	Description (For information only)	AOP Condition #
	5	Operation and Maintenance Plan: requires an operation and maintenance plan to be developed and implemented for the planer baghouse.	Applicable Requirement Condition AR 3.4
	6	Recordkeeping: requires approval order and operation and maintenance plan to be maintained and made available on site.	Applicable Requirement Condition RK 12
06NOC490 (Dry Kilns & Spray Coating System - Amended)	None	NA	NA
11MOD861 (Dry Kiln Temperature- Amended)	None	NA	NA
15ADM1089 (Dry Kiln Temperature)	1	Technical Specifications: requires approved equipment to comply with specifications in application unless otherwise stated in approval order.	Not Ongoing – used as a point of reference for determining future modifications which may trigger NSR.
	2	Production Limit: limits dimensional lumber production to 350 MMbf/yr of which 315 MMbf/yr may be kiln dried.	Applicable Requirement Condition PW13 & AR2.1
	3	Material Limit: limits kiln drying to western hemlock and Douglas fir unless approval is granted by ORCAA.	Applicable Requirement Condition AR2.2
	4	Kiln Temperature Limit: limits kiln temperatures to 200 °F.	Applicable Requirement Conditions AR2.3 & M10
	5	Record Keeping: specifies records required to be kept regarding kiln drying of lumber.	Applicable Requirement Condition RK13
	6	Dust Management Plan: requires a plan to control fugitive dust and applies some requirements to the plan.	Applicable Requirement Condition PW12
	7	Operation and Maintenance Plan: requires a plan to assure compliance with kiln temperature limitation.	Applicable Requirement Condition AR2.4
	8	Reporting Excess Emissions: requires excess emissions to be reported ASAP and within 24 hours.	Applicable Requirement Condition R13
	9	Access for Inspections: requires SPI to allow appropriate personnel from ORCAA, Ecology, and EPA to inspect facility at reasonable times for compliance assurance.	Applicable Requirement Condition G1 & G2
	10	Emissions Inventory: requires annual reporting of actual emissions with supporting calculations and data.	Applicable Requirement Condition R8

6.0 Regulatory Determinations

6.1 Title V of the Federal Clean Air Act

The SPI Lumber Mill is a major source of criteria and hazardous air pollutants and, therefore, subject to Title V of the Federal Clean Air Act.

As the Aberdeen Lumber Mill is subject to Title V of the Federal Clean Air Act, it is therefore required to apply for and obtain an Air Operating Permit for the following reasons, each of which would be sufficient individually:

1. EU2, lumber drying, has a potential to emit 19 tons per year or greater of acetaldehyde, which is a hazardous air pollutant listed in Section 112(b) of the Federal Clean Air Act.
2. EU2 has a potential to emit 13 tons per year or greater of methanol, which is a hazardous air pollutant listed in Section 112(b) of the Federal Clean Air Act.
3. EU2 has a potential to emit greater than 32 tons per year or greater of combined hazardous air pollutants listed in Section 112(b) of the Federal Clean Air Act.
4. The facility has a potential to emit 120 tons per year or greater of volatile organic compounds.

SPI has operated under either a permit application shield or under a permit at all times it was subject to Title V permit requirements.

6.2 New Source Performance Standards (NSPS)

EPA establishes New Source Performance Standards (NSPS) for new, modified or reconstructed facilities and source categories emitting criteria air pollutants. NSPS are codified in 40 CFR Part 60. The following sections detail regulatory determinations for relevant regulations under 40 CFR Part 60, referred to as “Subparts.”

40 CFR Part 60, Subpart D: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

Subpart D applies to fossil-fuel-fired steam generating units of more than 250 MMBtu/hr. EU1 is a natural gas fired package boiler with a maximum rated heat input capacity of 40 MMBtu/hr. Therefore Subpart D does not apply.

40 CFR Part 60, Subpart Da: Standards of Performance for Electric Utility Steam Generating Units

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 Part 60, Subpart Db: Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

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 Part 60, Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Subpart Dc applies to steam generating units with a heat input capacity greater than 10 MMBtu/hr but less than 100 MMBtu/hr that commenced construction, modification, or reconstruction after June 9, 1989. The package boiler at SPI has a maximum design heat input capacity of 40 MMBtu/hr. Therefore, Subpart Dc applies to SPI's package boiler.

40 CFR Part 60, Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

Subpart IIII Implements the Federal Clean Air Act to require more stringent standards for stationary compression ignition engines, consistent with recent revisions to standards for similar mobile engines. ORCAA staff determined that Subpart IIII doesn't apply to the fire pump engine because it was manufactured before April 1, 2006. There are no applicable requirements to EU 5 from Subpart IIII.

Table 6.1: Conditions from 40 CFR Part 60 Subpart A through 40 CFR Part 60 Subpart Dc as Applied to EU1

CITATION	DESCRIPTION	APPLICABLE?	CONDITION
§60.1-§60.4	Applicability, definitions, units and abbreviations, and address	No	NA
§60.5	Determination of construction or modification	If requested by Authority	NA
§60.6	Review of plans	If requested by Authority	NA
§60.7(a)	Notifications and record keeping (a): requires notification to the Authority of construction, startup, modification resulting in increases in the emission rate of a pollutant subject to a standard, demonstration of continuous monitoring system performance, opacity observations, and that COMS will be used to satisfy opacity monitoring requirements.	Not ongoing	NA
§60.7(b)	Notifications and record keeping (b): requires records of startup, shutdown, and malfunction	Yes	RK16
§60.7(c)-(e)	Notifications and record keeping (c)-(e): requires submission of excess emission reports by facilities required to install and maintain continuous emission monitoring devices and specifies content and frequency of such reports	No	NA
§60.7(f)	Notifications and record keeping (f): requires the owner or operator to maintain a file containing all information required by Part 60 in a permanent form suitable inspection for at least two years	Yes	RK1
§60.7(g)&(h)	Notifications and record keeping (g)&(h): allows streamlining and clarifications	No	NA
§60.8	Performance Testing: applies to affected facilities only	No	NA
§60.9	Availability of information: applies to Authority	No	NA
§60.10	State authority: applies to state and local agencies	No	NA
§60.11	Compliance with standards and maintenance requirements: applies to affected facilities only	No	NA
§60.12	Circumvention: applies to affected facilities only	No	NA
§60.13	Monitoring requirements: applies to affected facilities only	No	NA

CITATION	DESCRIPTION	APPLICABLE?	CONDITION
§60.14	Modification: specifies what is meant by a modification	No	NA
§60.15	Reconstruction: specifies what is meant by reconstruction	No	NA
§60.16	Priority List: contains a prioritized list of major source categories	No	NA
§60.17	Incorporations by reference	No	NA
§60.18	General control device and work practice standards: applies to affected facilities only	No	NA
§60.19	General notification and reporting requirements: no ongoing notifications required	Not ongoing	NA

Table 6.2: Conditions from 40 CFR Part 60 Subpart Dc as applied to EU1

CITATION	DESCRIPTION	APPLICABLE?	CONDITION
§60.40c	Applicability and delegation of authority	No	NA
§60.41c	Definitions	No	NA
§60.42c	Standard for sulfur dioxide: applies only to boilers that combust coal or oil.	No	NA
§60.43c	Standard for particulate matter: applies only to boilers that combust coal, oil, or wood.	No	NA
§60.44c	Compliance and performance test methods and procedures for sulfur dioxide: applies only when there is a sulfur dioxide standard	No	NA
§60.45c	Compliance and performance test methods and procedures for particulate matter: applies only when there is a particulate matter standard	No	NA
§60.46c	Emission monitoring for sulfur dioxide: applies only when there is a sulfur dioxide standard	No	NA
§60.47c	Emission monitoring for particulate matter: applies only when there is a particulate matter standard	No	NA
§60.48c(a)	Reporting and recordkeeping requirements (a): requires notification of startup of affected facilities.	Not ongoing	NA
§60.48c(b)	Reporting and recordkeeping requirements (b): requires submission of performance test data for facilities subject to SO ₂ , PM, or opacity limits under this subpart.	No	NA
§60.48c(c)	Reporting and recordkeeping requirements (c): requires submission of excess emissions reports for facilities subject to an opacity limit under this subpart.	No	NA
§60.48c(d)-(f)	Reporting and recordkeeping requirements (d) through (f): requires maintenance and submission of records for facilities subject to SO ₂ , fuel oil sulfur limits, or percent reduction requirements under this subpart.	No	NA
§60.48c(g)	Reporting and recordkeeping requirements (g): requires maintenance of records of types and quantities of fuels combusted during each calendar month	Yes	RK17
§60.48c(h)	Reporting and recordkeeping requirements (h): requires calculation of annual capacity factors for facilities subject to a federally enforceable requirement limiting the annual capacity for any fuel or mixture of fuels.	No	NA
§60.48c(i)	Reporting and recordkeeping requirements (i): requires records required by this subpart to be maintained for at least five years	Yes	RK1
§60.48c(j)	Reporting and recordkeeping requirements (j): sets a reporting period of six months for all reports required by this subpart	No	NA

6.3 National Emission Standards for Hazardous Air Pollutants (NESHAP)

EPA establishes National Emission Standards for Hazardous Air Pollutants (NESHAP) under 40 CFR 63 to regulate HAP emissions from major sources of HAP. This regulatory program defines a major source as any facility that has the potential to emit more than 10 tons per year of a single HAP or more than 25 tons per year of all HAPs combined. Based on current estimates of emissions, SPI is a major HAP source.

40 CFR Part 63, Subpart DDDD: National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products: According to § 63.2231(a), facilities that are major sources of hazardous air pollutants and kiln dry lumber are subject to this subpart. According to § 63.2252, no requirements from this subpart or subpart A other than initial notification apply to equipment, including lumber kilns, that are not subject to any of the compliance options or work practice standards. Therefore, *no AOP conditions are based on this subpart.*

40 CFR Part 63, Subpart QQQQ: National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products: This subpart does not apply as the lumber produced by SPI at the Aberdeen lumber mill does not fit any of the descriptions of wood building products.

40 CFR Part 63, Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines: Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources for HAP emissions. In this case, SPI is a major source of HAPs.

SPI has one 151 hp diesel fire pump engine, which was constructed in 1996. For stationary RICE located at a major source of HAP emissions, an emergency stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006. Therefore, for the purposes of this standard, the unit is considered an existing emergency engine at a major source of HAPs.

40 CFR Part 63, Subpart DDDDD: National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters (The Boiler MACT): According to §63.7485, facilities that are major sources of hazardous air pollutants and operate boilers or process heaters are subject to this subpart. Subpart DDDDD applies to the boiler at SPI. The boiler is regulated as an existing boiler under the Boiler MACT and is required to comply with limits and standards by January 31, 2016. For purposes of regulation under 40 CFR Part 63, Subpart DDDDD, the Boiler is classified as an existing boiler under the “Units designed to burn gas 1 fuels” classification. Requirements for other subcategories do not apply.

40 CFR Part 63, Subpart JJJJJ: National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters at Area Sources: In June of 2010, EPA proposed the NESHAP for boilers and process heaters at area sources of hazardous air pollutants (HAP). The term “Area Sources” refers to sources of HAP emissions that are not major. The final rule was posted on the Federal Register on February 1, 2013. Because SPI is a major source of HAP emissions, SPI is not an “Area Source” of HAP emissions and is not subject to Subpart JJJJJ.

Table 6.3: Conditions from 40 CFR Part 63 Subpart A as Applied to EU5 with respect to Subpart ZZZZ

CITATION	DESCRIPTION	APPLICABLE?	CONDITION
§ 63.1 - § 63.3	Applicability, definitions, units and abbreviations.	No ongoing requirements	NA
§ 63.4(a)	Prohibited activities.	Yes	RK1 & R6
§ 63.4(b)	Circumvention.- No owner or operator subject to the provisions of this part shall build, erect, install, or use any article, machine, equipment, or process to conceal an emission that would otherwise constitute noncompliance with a relevant standard	Applicable if triggered	NA
§ 63.4(c)	Prohibits fragmentation.	Applicable if triggered	NA
§ 63.5	Preconstruction Review and notification requirements.	No ongoing requirements	NA
§ 63.6	Compliance with standards and maintenance requirements.	No ongoing requirements	NA
§ 63.7	Testing requirements.	No ongoing requirements	NA
§ 63.8(a)-(f)	Monitoring requirements.	No ongoing requirements	NA
§ 63.9	Notifications.	No ongoing requirements	NA
§ 63.10 (a)(1)-(3), (5)-(7)	Applicability and general requirements for recordkeeping and reporting.	No	NA
§ 63.10 (a)(4)	Until ORCAA has been delegated the authority to implement and enforce recordkeeping and reporting requirements, required reports shall be submitted to EPA Region 10.	No reports required.	NA
§ 63.10 (b)(1)	General recordkeeping requirements.	Yes	RK1 & RK15
§ 63.10 (b)(2)	Recordkeeping requirements for SSM and CMS and CEMS.	No	NA
§ 63.10 (b)(3)	Recordkeeping for applicability determinations.	No	NA
§ 63.10 (c)	Additional recordkeeping requirements for sources with continuous monitoring systems.	No	NA
§ 63.10 (d)	General reporting requirements.	No	NA
§ 63.10 (e)	Additional reporting requirements for sources with continuous monitoring systems.	No	NA
§ 63.10 (f)	Waiver of recordkeeping or reporting requirements.	No	NA
§ 63.11	Control device and work practice standards.	No	NA
§ 63.12 – § 63.16	State authorities and delegations, agency addresses, incorporations by reference, availability of information and confidentiality, and performance track provisions.	No	NA

Table 6.4: Conditions from Title 40 CFR Part 63 Subpart ZZZZ as applied to EU5

Citation	Description	Applicable?	Condition
Title 40 CFR 63.6580	What is the purpose of this subpart?	Yes, although no ongoing requirements	N/A
Title 40 CFR 63.6585(a)	Stationary RICE definition	Yes, although no ongoing requirements	N/A
Title 40 CFR 63.6585(b)	Major Source definition	No ongoing requirements	N/A
Title 40 CFR 63.6585(c)	Area Source definition	No ongoing requirements	N/A

Title 40 CFR 63.6585(d)-(e)	Other requirements	No ongoing requirements	N/A
Title 40 CFR 63. 6590(a)(1)	Affected Source - Existing stationary RICE	Yes, although no ongoing requirements	N/A
Title 40 CFR 63. 6590(a)(2)	Affected Source - New stationary RICE	No ongoing requirements	N/A
Title 40 CFR 63. 6590(a)(3)	Affected Source - Reconstructed stationary RICE	No ongoing requirements	N/A
Title 40 CFR 63. 6590(b)	Stationary RICE subject to limited requirements	No ongoing requirements	N/A
Title 40 CFR 63. 6590(c)	Stationary RICE subject to Title 40 CFR Part 60	No ongoing requirements	N/A
Title 40 CFR 63. 6595(a)(1)	Compliance dates for existing stationary RICE at major sources	Yes, although no ongoing requirements	N/A
Title 40 CFR 63. 6595(a)(2)	Compliance dates for starting up new or reconstructed stationary RICE at major sources before August 16, 2004.	No ongoing requirements	N/A
Title 40 CFR 63. 6595(a)(3)	Compliance dates for starting up new or reconstructed stationary RICE at major sources after August 16, 2004.	No ongoing requirements	N/A
Title 40 CFR 63. 6595(a)(4)	Compliance dates for starting up new or reconstructed stationary RICE less than 500hp at major sources before January 18, 2008.	No ongoing requirements	N/A
Title 40 CFR 63. 6595(a)(5)	Compliance dates for starting up new or reconstructed stationary RICE at major sources after August 16, 2004.	No ongoing requirements	N/A
Title 40 CFR 63. 6595(a)(6)	Compliance dates for stating up new or reconstructed stationary RICE at area sources before January 18, 2008.	No ongoing requirements	N/A
Title 40 CFR 63. 6595(a)(7)	Compliance dates for starting up new or reconstructed stationary RICE at area sources after January 18, 2008.	No ongoing requirements	N/A
Title 40 CFR 63. 6595(b)	Area sources that become a major source	No ongoing requirements	N/A
Title 40 CFR 63. 6600	What emission limitations and operating limitations must I meet if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?	No ongoing requirements	N/A
Title 40 CFR 63. 6601	What emission limitations must I meet if I own or operate a new or reconstructed 4SLB stationary RICE with a site rating of greater than or equal to 250 brake HP and less than or equal to 500 brake HP located at a major source of HAP emissions?	No ongoing requirements	N/A
Title 40 CFR 63. 6602	What emission limitations must I meet if I own or operate existing stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions?	Yes, Table 2c to Subpart ZZZZ applies	AR5.1
Title 40 CFR 63. 6603	What emission limitations and operating limitations must I meet if I own or operate existing stationary RICE located at an area source of HAP emissions?	No ongoing requirements	N/A
Title 40 CFR 63. 6604	What fuel requirements must I meet if I own or operate an existing stationary CI RICE?	No ongoing requirements	N/A
Title 40 CFR 63. 6605	What are my general requirements for complying with this subpart?	No ongoing requirements	N/A
Title 40 CFR 63. 6610	By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?	No ongoing requirements	N/A
Title 40 CFR 63. 6611	By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a	No ongoing requirements	N/A

	new or reconstructed 4SLB SI stationary RICE with a site rating of greater than or equal to 250 and less than or equal to 500 brake HP located at a major source of HAP emissions?		
Title 40 CFR 63.6612	By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate an existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing stationary RICE located at an area source of HAP emissions?	No ongoing requirements	N/A
Title 40 CFR 63.6615	When must I conduct subsequent performance tests?	No ongoing requirements	N/A
Title 40 CFR 63.6620	What performance tests and other procedures must I use?	No ongoing requirements	N/A
Title 40 CFR 63.6625	What are my monitoring, installation, collection, operation, and maintenance requirements?	Yes, ongoing requirements	AR5.2 & AR5.3
Title 40 CFR 63.6630	How do I demonstrate initial compliance with the emission limitations and operating limitations?	No ongoing requirements	N/A
Title 40 CFR 63.6635	How do I monitor and collect data to demonstrate continuous compliance?	No ongoing requirements	N/A
Title 40 CFR 63.6640	How do I demonstrate continuous compliance with the emission limitations and operating limitations?	No ongoing requirements	N/A
Title 40 CFR 63.6640(f)	Requirements for emergency stationary RICE	Yes	AR5.4
Title 40 CFR 63.6645	What notifications must I submit and when?	No ongoing requirements	N/A
Title 40 CFR 63.6650	What reports must I submit and when?	No ongoing requirements	N/A
Title 40 CFR 63.6655	What records must I keep?	No ongoing requirements	N/A
Title 40 CFR 63.6660	In what form and how long must I keep my records?	No ongoing requirements	N/A
Title 40 CFR 63.6665	What parts of the General Provisions apply to me?	Yes, although no ongoing requirements	N/A
Title 40 CFR 63.6670	Who implements and enforces this subpart?	No ongoing requirements	N/A
Title 40 CFR 63.6675	What definitions apply to this subpart?	No ongoing requirements	N/A

Table 6.5: Conditions from 40 CFR Part 63 Subpart A as Applied to EU1 with respect to Subpart DDDDD

CITATION	BRIEF DESCRIPTION	APPLICABILITY DETERMINATION	CONDITION
§ 63.1	Applicability.	Yes	No ongoing requirements.
§ 63.2	Definitions.	Yes	No ongoing requirements.
§ 63.3	Units and abbreviations.	Yes	No ongoing requirements.
<i>Prohibited activities and circumvention</i>			

CITATION	BRIEF DESCRIPTION	APPLICABILITY DETERMINATION	CONDITION
§ 63.4(a)	Prohibited activities.	If triggered	<p>(a) <i>Prohibited activities.</i> (1) No owner or operator subject to the provisions of this part must operate any affected source in violation of the requirements of this part.</p> <p>(2) No owner or operator subject to the provisions of this part shall fail to keep records, notify, report, or revise reports as required under this part.</p>
§ 63.4(b)	Circumvention.	If triggered	(b) <i>Circumvention.</i> No owner or operator subject to the provisions of this part shall build, erect, install, or use any article, machine, equipment, or process to conceal an emission that would otherwise constitute noncompliance with a relevant standard
§ 63.4(c)	Prohibits fragmentation.	If triggered	(c) <i>Fragmentation.</i> Fragmentation after November 15, 1990 which divides ownership of an operation, within the same facility among various owners where there is no real change in control, will not affect applicability. The owner and operator must not use fragmentation or phasing of reconstruction activities (i.e., intentionally dividing reconstruction into multiple parts for purposes of avoiding new source requirements) to avoid becoming subject to new source requirements.
<i>Preconstruction review and notification requirements</i>			

CITATION	BRIEF DESCRIPTION	APPLICABILITY DETERMINATION	CONDITION
§ 63.5	Preconstruction Review and notification requirements.	If triggered	<p>MACT Reconstruction Approval. The permittee shall not reconstruct (as defined in 40 CFR 63.2) the affected source without obtaining written approval from ORCAA in accordance with the procedures in 40 CFR 63.5(d)&(e). The owner or operator shall submit an application for approval in accordance with 40 CFR 63.5(d).</p> <p>New Equipment / Process Change. Any equipment added (or a process change) to an affected source that is within the scope of the definition of affected source under the relevant standard must be considered part of the affected source and subject to all provisions of the relevant standard established for that affected source.</p>
<i>Compliance with standards and maintenance requirements</i>			
§ 63.6 (a)-(c)	Applicability and compliance dates.	Yes, but no ongoing requirements.	NA
§ 63.6 (d)	[Reserved]	-	NA
§ 63.6 (e)(1)	Operation and maintenance requirements.	Not applicable per §63.7565 Table 10	NA
§ 63.6 (e)(2)	[Reserved]	-	NA
§ 63.6 (e)(3)	Startup, shutdown and malfunction plan.	Not applicable per §63.7565 Table 10	NA
§ 63.6 (f)(1)	Compliance except during startup, shutdown and malfunction.	Not applicable per §63.7565 Table 10	NA
§ 63.6 (f)(2)-(3)	Compliance with non-opacity emission standards	NA	NA
§ 63.6 (g)(1)-(3)	Alternative standard.	NA	NA
§ 63.6 (h)(1)	Startup, shutdown, and malfunction exemptions to Opacity/Visible Emission Standards.	Not applicable per §63.7565 Table 10	NA
§ 63.6 (h)(2)-(h)(9)	Compliance with Opacity/Visible Emission Standards.	Not applicable per §63.7565 Table 10	NA
§ 63.6 (i)-(j)	Compliance Extensions.	NA	NA
<i>Performance testing requirements</i>			
§ 63.7(a)(1)-(2), (4)	Performance test dates.	NA	NA
§ 63.7(a)(3)	Section 114 Authority.	If triggered	(3) The Administrator may require an owner or operator to conduct performance tests at the affected source at any other time when the action is authorized by section 114 of the Act.

CITATION	BRIEF DESCRIPTION	APPLICABILITY DETERMINATION	CONDITION
§ 63.7(b-g)	Performance tests – Notification Requirements	Applicable if triggered	Operator shall follow procedures outlined in § 63.7(b-g) if source testing is ever required by the Administrator through §63.7(a)(3).
Monitoring requirements			
§ 63.8(a)-(b)	Applicability and conduct of monitoring	NA	NA
§ 63.8(c-g)	Operation and maintenance of continuous monitoring systems	NA- no CMS	NA
§ 63.9(a)	Until ORCAA has been delegated the authority to implement and enforce notification requirements, required reports shall be submitted to EPA Region 10.	Yes	R12
§ 63.9(b)	Initial notification.	Yes- but not an ongoing requirement	NA
§63.9(c)	Request for extension of compliance.	No	NA
§63.9(d)	Notification of Special Compliance Requirements for New Source	No	NA
§63.9(e)	Notification of Performance Test	If triggered	Operator shall follow procedures outlined in § 63.7(b-g) at least 60 days prior to testing if source testing is ever required by the Administrator through §63.7(a)(3).
§63.9(f)	Notification of VE/Opacity Test	No	NA
§63.9(g)	Additional Notifications When Using CMS	No	NA
§63.9(h)	Notification of Compliance Status	Yes	R16
§63.9(i)	Adjustment of Submittal Deadlines	Yes, only if requested by source.	None
§63.9(j)	Change in information already provided.	No	NA
§ 63.10 (a)(1)-(3), (5)-(7)	Applicability and general requirements for recordkeeping and reporting.	Yes	No ongoing requirements
§ 63.10 (a)(4)	Until ORCAA has been delegated the authority to implement and enforce recordkeeping and reporting requirements, required reports shall be submitted to EPA Region 10.	Yes	R12
§ 63.10 (b)(1)	General recordkeeping requirements.	Yes	RK1 & RK15
§ 63.10 (b)(2)(i)-(ii), (iv)-(vi), (x), (xi), (xiii)	Recordkeeping requirements for SSM and CMS and CEMS.	No	NA
§ 63.10 (b)(2)(iii)	Records related to maintenance of air pollution control equipment.	Yes	RK18 and RK19
§ 63.10 (b)(2)(vii)-(ix)	Records related to performance tests.	No	NA
§ 63.10 (b)(2)(xii)	Waiver of recordkeeping and reporting requirements.	No	NA
§ 63.10 (b)(2)(xiv)	Documentation supporting initial notifications and notifications of compliance status.	Yes	RK18
§ 63.10 (b)(3)	Recordkeeping for applicability determinations.	No	NA
§ 63.10 (c)	Additional recordkeeping requirements for sources with continuous monitoring systems.	No	NA

CITATION	BRIEF DESCRIPTION	APPLICABILITY DETERMINATION	CONDITION
§ 63.10 (d)(1)	General reporting requirements.	Yes- generally applicable	(d)(1) Notwithstanding the requirements in this paragraph or paragraph (e) of this section, and except as provided in §63.16, the owner or operator of an affected source subject to reporting requirements under this part shall submit reports to the Administrator in accordance with the reporting requirements in the relevant standard(s).
§ 63.10 (d)(2)	Report of Performance Test Results	No	NA
§ 63.10 (d)(3)	Reporting Opacity or VE Observations	No	NA
§ 63.10 (d)(4)	Progress Reports	No	NA
§ 63.10 (d)(5)	SSM Reports	No	NA
§ 63.10 (e)	Additional reporting requirements for sources with continuous monitoring systems.	No	NA
§ 63.10 (f)	Waiver of recordkeeping or reporting requirements.	Yes, only if requested by source.	None
§ 63.11(a)	Control device and work practice standards applicability.	No	NA
§ 63.11(b)	Flares	No	NA
§ 63.11(c)	Alternative work practice for monitoring equipment for leaks	No	NA
§ 63.11(d)	The alternative work practice standard for monitoring equipment for leaks additional requirements	No	NA
§ 63.11(e)	Requirements of owners and operators who choose to use the alternative work practice	No	NA
§ 63.12 – § 63.16	State authorities and delegations, agency addresses, incorporations by reference, availability of information and confidentiality, and performance track provisions.	No	NA

Table 6.6: Conditions from Title 40 CFR Part 63 Subpart DDDDD as applied to EU1

CITATION	BRIEF DESCRIPTION	APPLICABILITY DETERMINATION	CONDITION
WHAT THIS SUBPART COVERS			
§ 63.7480	What is the purpose of this subpart?	No	NA
§ 63.7485	Am I subject to this subpart?	EU1 is an industrial boiler located at a major source of HAP and therefore subject to this subpart. Not an applicable requirement per chapter 173-401 WAC.	NA
§ 63.7490	What is the affected source of this subpart?	EU1 was constructed in 2003 and has not been reconstructed. It is rated at 40 MMBtu/hr and fires natural gas. Therefore, EU1 is the affected source and is an existing industrial boiler.	NA
§ 63.7491	Are any boilers or process heaters not subject to this subpart?	None of these exemptions apply to this unit.	NA

CITATION	BRIEF DESCRIPTION	APPLICABILITY DETERMINATION	CONDITION
§ 63.7495	When do I have to comply with the subpart?	(b) As an existing boiler, EU1 must comply no later than January 31, 2016. (d) Submit notifications as required by § 63.7545. (a),(c),(e)-(i) do not apply.	No ongoing requirements
<i>EMISSION LIMITATIONS AND WORK PRACTICE STANDARDS</i>			
§ 63.7499	What are the subcategories of boilers and process heaters?	By definition, EU1 falls into the following subcategory: (l) Units designed to burn gas 1 fuels.	NA
<i>What emission limitations, work practice standards, and operating limits must I meet?</i>			
§ 63.7500 (a)	(1) You must meet each emission limit and work practice standard in Tables 1-3 and 11-13 that apply to your boiler.	Applicable. However, Gas 1 boilers are exempted from Tables 1, 2, and 11-13 through §63.7500(e)	Not an ongoing requirement. Energy assessment required by Table 3 was completed in January 2016.
	(2) You must meet each operating limit in Table 4 that applies to your boiler.	NA	NA

CITATION	BRIEF DESCRIPTION	APPLICABILITY DETERMINATION	CONDITION
	(3) You must operate the affected sources in a manner consistent with safety and good air pollution control practices for minimizing emissions.	Generally applicable	At all times, you must operate and maintain any affected source (as defined in §63.7490), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
§ 63.7500(b)	EPA may approve use of an alternative to the work practice standards.	Not currently requested.	NA
§ 63.7500(c)-(d)	Requirements for limited use boilers and boilers with a heat capacity less than 5 MMBtu/hr.	NA	NA
§ 63.7500(e)	Requirements and exemptions for Gas 1 units	Exempts boiler from Tables 1, 2, 4, and 11-13.	NA
§ 63.7500(f)	These standards apply at all times the affected unit is operating, except during periods of startup and shutdown during which time you must comply only with Table 3 to this subpart.	Not Applicable	NA
GENERAL COMPLIANCE REQUIREMENTS			

CITATION	BRIEF DESCRIPTION	APPLICABILITY DETERMINATION	CONDITION
§ 63.7505(a)	You must be in compliance with the emission limits, work practice standards, and operating limits in this subpart. These limits apply to you at all times the affected units are operating except as noted in §63.7500(f).	Generally Applicable	(a) You must be in compliance with the emission limits, work practice standards, and operating limits in this subpart. These emission and operating limits apply to you at all times the affected unit is operating except for the periods noted in §63.7500(f).
§ 63.7505(b)	[Reserved]	NA	NA
§ 63.7505(c)	Lists the methods which you must use to demonstrate compliance with all applicable emission limits. Allows an alternative fuel analysis for HCl, mercury, or TSM.	NA	NA
§ 63.7505(d)	If you demonstrate compliance with any applicable emission limit through performance testing and subsequent compliance with operating limits or with a CEMS or COMS, you must develop a site-specific monitoring plan for the use of any CEMs< COMS, or CPMS according to this section.	NA	NA
TESTING, FUEL ANALYSES, AND INITIAL COMPLIANCE REQUIREMENTS			
<i>What are my initial compliance requirements and by what date must I conduct them?</i>			
§ 63.7510(a)	If you are required or elect to demonstrate compliance through performance testing, your initial compliance requirements are: (1) Conduct performance tests according to § 63.7520 and Table 5. (2) Conduct a fuel analysis for each type of fuel burned in your boiler according to § 63.7521 and Table 6. (3) Establish operating limits according to § 63.7530 and Table 7. (4) Conduct CMS performance evaluations according to § 63.7525.	NA	NA
§ 63.7510(b)	Requirements for boilers electing to show compliance with HCl, mercury, or TSM emission limits through fuel analysis.	NA	NA
§ 63.7510(c)	Initial compliance demonstration requirements for boilers subject to a CO limit.	NA	NA
§ 63.7510(d)	Initial compliance demonstration for PM limit is to conduct a performance test according to § 63.7520 and Table 5.	NA	NA

CITATION	BRIEF DESCRIPTION	APPLICABILITY DETERMINATION	CONDITION
§ 63.7510(e)	Requires Initial compliance demonstration as required above by 180 days after the compliance date; initial tune-up by following procedures in §62.7540(a)(10)(i) through (vi) and one-time energy assessment specified in Table 3 no later than the compliance date.	Compliance date for existing sources is 1/31/16. Therefore, the Initial compliance demonstration would be due no later than 7/29/16. However, per §63.7545(e), the NOCS is due “before 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).” While the SPI cogeneration and lumbermill facilities have separate AOP’s, they are considered one facility under the MACT. Therefore, the boiler NOCS due date for both facilities is based on the source test for the cogeneration facility’s stack test, which is scheduled for spring 2016.	R16
§ 63.7510(f)-(g)	Compliance dates for new or reconstructed sources.	The boiler is considered an existing source with respect to this subpart.	NA
§ 63.7510(h)	Compliance date for sources that ceased burning solid waste.	Not applicable. The boiler burns natural gas/ Gas 1 as its primary fuel.	NA
§ 63.7510(i)	Compliance date for certain EGUs.	Not applicable. The boiler is not an EGU.	NA
§ 63.7510(j)	Compliance date for existing affected sources that were not operational between the effective date and the compliance date of the rule.	Not applicable. The boiler was operational during that time.	NA
<i>When must I conduct subsequent performance tests, fuel analyses, or tune-ups?</i>			
§ 63.7515(a)	All applicable performance tests must be conducted on an annual basis. Annual performance test must be completed no more than 13 months after the previous performance test.	NA	NA
§ 63.7515(b) – (c)	Allows alternative testing schedule if 2 consecutive performance tests show emissions at or below 75% of the emission limit.	NA	NA
§ 63.7515(d)	Applicable tune-up work practice standards must be conducted on an annual or 5-year basis. Each annual tune-up must be not more than 13 months after the previous tune-up.	§63.7540(a)(10)(i-vi) applies.	AR 1.5
§ 63.7515(e)	Requirement to conduct fuel analyses monthly if you demonstrate compliance with the mercury, HCl or TSM based on fuel analysis.	NA	NA
§ 63.7515(f)	Requirement to report results of performance test and fuel analyses within 60 days after the completion of the performance test. The report shall include verification that operating limits have not changed or documentation of revised operating limits.	NA	NA
§ 63.7515(g)	Compliance demonstration due dates for facilities that shut down temporarily.	NA	NA

CITATION	BRIEF DESCRIPTION	APPLICABILITY DETERMINATION	CONDITION
§ 63.7515(h)	Requirement for boiler in light liquid subcategory.	NA	NA
§ 63.7515(i)	If you use a CO CEMs to show compliance with the alternative CO CEMS emission standard, you are not requirement to conduct a CO performance test and are not subject to the oxygen concentration operating limit.	NA	NA
<i>What stack tests and procedures must I use?</i>			
§ 63.7520	Requirements for stack tests.	NA	NA
<i>What fuel analyses, fuel specification, and procedures must I use?</i>			
§ 63.7521	Requirements for how to conduct fuel analyses.	NA	NA
<i>Can I use emissions averaging to comply with the subpart?</i>			
§ 63.7522	How emissions averaging can be used to comply with this subpart if you have more than one existing boiler in any subcategory.	NA	NA
<i>What are my monitoring, installation, operation, and maintenance requirements?</i>			
§ 63.7525(a)	Requirements for an oxygen analyzer system if subject to a CO emission limit OR CO/O2 CEMS.	NA	NA
§ 63.7525(b)	Requirement for PM CPMS for units designed to burn coal/solid fossil fuel or heavy liquid and has an average annual heat input > 250 MMBtu/hr.	NA	NA
§ 63.7525(c)	COMS requirement if you have an applicable opacity limit and are not otherwise required or elect to have a PM CPMS, PM CEMS, or bag leak detection system.	NA	NA
§ 63.7525(d)	Requirements if you have an operating limit that requires the use of a CMS other than a PM CPMS or COMS.	NA	NA
§ 63.7525(e) – (i)	Requirements for monitors used on control devices for operating limits.	NA	NA
§ 63.7525(j)	Requirements if you are not required to use a PM CPMS and elect to use a fabric filter bag leak detection system.	NA	NA
§ 63.7525(k)	Requirement for limited use boilers.	NA	NA
§ 63.7525(l)	Requirements for using mercury or HCl CEMS for compliance.	NA	NA
§ 63.7525(m)	Requirements for boilers subject to HCl emission limit that have an acid gas wet scrubber or dry sorbent injection control technology and use a SO2 CEMS.	NA	NA
<i>How do I demonstrate initial compliance with the emission limitations, fuel specifications and work practice standards?</i>			
§ 63.7530(a)	Requirement to demonstrate initial compliance with each emission limit that applies to you by conducting initial performance tests and fuel analyses, establishing operating limits, and install, operate, and maintain all applicable CMS.	NA	NA

CITATION	BRIEF DESCRIPTION	APPLICABILITY DETERMINATION	CONDITION
§ 63.7530(b), § 63.7530(b) (1)-(3)	If you demonstrate compliance through performance testing, requirement to establish site-specific operating limits in Table 4 that applies to you according to requirements in § 63.7520, Table 7, and (b)(4) of this section. Also requires fuel analysis and establishing maximum fuel pollutant input levels.	NA	NA
	(1)-(3) Fuel analysis requirements referenced in § 63.7530(b).	NA	NA
§ 63.7530(b)(4)	Requirement to establish parameter operating limits according to (i) – (ix) below. You are not required to use operating parameter limits when you are using a CEMS to demonstrate compliance.		
	(i) Requirements for a wet acid gas scrubber.	NA	NA
	(ii) Requirements for particulate control device for which you use a CPMS.	NA	NA
	(iii)-(vi) Requirements for ESP with a wet scrubber, dry scrubber, activated carbon injection, and baghouse.	NA	NA
	(vii) Requirements for a minimum oxygen level	NA	NA
	(viii) Operating limit requirement for boilers that demonstrate continuous compliance with the HCl emission limit using a SO2 CEMS.	NA	NA
§ 63.7530(c)	Requirements if you elect to demonstrate compliance with an applicable emission limit through fuel analysis.	NA	NA
§ 63.7530(d)	Reserved	NA	NA
§ 63.7530(e)	Requirement to submit signed certification with the NOCS that the energy assessment was completed.	Applicable- One-time requirement due 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). You must include with the Notification of Compliance Status a signed certification that either the energy assessment was completed according to Table 3 to this subpart, and that the assessment is an accurate depiction of your facility at the time of the assessment, or that the maximum number of on-site technical hours specified in the definition of energy assessment applicable to the facility has been expended.	R16
§ 63.7530(f)	Requirement to submit the NOCS containing the results of the initial compliance demonstration.	Applicable	R16

CITATION	BRIEF DESCRIPTION	APPLICABILITY DETERMINATION	CONDITION
§ 63.7530(g)	Requirements if you elect to demonstrate that a gaseous fuel meets the specifications of another gas 1 fuel.	NA	NA
§ 63.7530(h)	Requirement to meet the work practice standards in Table 3 if you are subject to an emission limit in Table 1, 2, 11, 12, or 13.	NA	NA
§ 63.7530(i)	Requirements if you opt to comply with alternative SO2 CEMS operating limit.	NA	NA
<i>Can I use efficiency credits earned from implementation of energy conservation measures to comply with this subpart?</i>			
§ 63.7533	Requirements if you elect to comply with the alternative equivalent output-based emission limits and you want to take credit for implementing energy conservation measures.	NA	NA
<i>Is there a minimum amount of monitoring data I must obtain?</i>			
§ 63.7535(a)	Requirement to monitor and collect data according to this section and the site-specific monitoring plan (§ 63.7505(d))	NA	NA
§ 63.7535(b)	Requirement to operate the monitoring system and collect data at all times the boiler is operating and compliance is required, with exceptions.	NA	NA
§ 63.7535(c)-(d)	Requirements on recording monitoring system malfunctions, etc and what data must be used in assessing compliance.	NA	NA
<i>How do I demonstrate continuous compliance with the emission limitations, fuel specifications and work practice standards?</i>			
§ 63.7540(a)	Requirement to demonstrate continuous compliance with each emissions limit in Tables 1 and 2 or 11 through 13 of this subpart, the work practice standards in Table 3, and the operating limits in Table 4 that applies to you according to the methods in Table 8 and paragraphs (a)(1) through (19) of this section.	Applicable	AR1.5
§ 63.7540(a)(1)	Requirement to operate within the operating limits established during the initial compliance demonstration. Operation outside these limits is a deviation except during performance tests.	NA	NA
§ 63.7540(a)(2)	Requirement to keep records of the type and amount of all fuels burned in the boiler or process heater during the reporting period.	NA	NA
§ 63.7540(a)(3)	Requirements if you demonstrate compliance with an applicable HCl emission limit through fuel analysis for a solid or liquid fuel and you plan to burn a new type of solid or liquid fuel.	NA	NA
§ 63.7540(a)(4)	Requirements if you demonstrate compliance with an applicable HCl emission limit through performance testing and you plan to burn a new type of solid or liquid fuel.	NA	NA

CITATION	BRIEF DESCRIPTION	APPLICABILITY DETERMINATION	CONDITION
§ 63.7540(a)(5)	Requirements if you demonstrate compliance with an applicable mercury emission limit through fuel analysis and you plan to burn a new type of solid or liquid fuel.	NA	NA
§ 63.7540(a)(6)	Requirements if you demonstrate compliance with an applicable mercury emission limit through performance testing and you plan to burn a new type of solid or liquid fuel.	NA	NA
§ 63.7540(a)(7)	Requirements if your unit is controlled by a fabric filter.	NA	NA
§ 63.7540(a)(8)	Requirements to demonstrate compliance with the applicable alternative CO CEMS emission limit.	NA	NA
§ 63.7540(a)(9)	Requirements if you use a PM CPMS or PM CEMS.	NA	NA
§ 63.7540(a)(10)	Annual tune-up requirement for boilers with a heat input capacity of 10 MMBtu/hr or greater with some exceptions.	Applicable.	AR1.5
§63.7540(a)(10)(i)	Requirements that specify what is included in a tune-up.	Applicable.	AR1.5
§63.7540(a)(10)(ii)	Requirements that specify what is included in a tune-up.	Applicable	AR1.5
§63.7540(a)(10)(iii)	Requirements that specify what is included in a tune-up.	Applicable	AR1.5
§63.7540(a)(10)(iv)	Requirements that specify what is included in a tune-up.	Applicable	AR1.5
§63.7540(a)(10)(v)	Requirements that specify what is included in a tune-up.	Applicable	AR1.5
§63.7540(a)(10)(vi)	Requirements that specify what is included in a tune-up.	Applicable	RK19
§ 63.7540(a)(11)	Biennial tune-up requirement for units less than 10 MMBtu/hr.	NA	NA
§ 63.7540(a)(12)	Requirement for units with continuous oxygen trim systems (and others) to conduct a tune-up per § 63.7540(a)(10)(i)-(vi) every 5 years.	NA	NA
§ 63.7540(a)(13)	Allows delay of tune-up if the unit is not operating.	Applicable	AR1.6
§ 63.7540(a)(14)	Requirement if you are using a CEMS measuring mercury emissions.	NA	NA
§ 63.7540(a)(15)	Requirement if you are using a CEMS measuring HCl emissions.	NA	NA
§ 63.7540(a)(16)	Requirements if you demonstrate compliance with an applicable TSM emission limit through performance testing and you plan to burn a new type of solid or liquid fuel.	NA	NA
§ 63.7540(a)(17)	Requirements if you demonstrate compliance with an applicable TSM emission limit through fuel analysis and you plan to burn a new type of solid or liquid fuel.	NA	NA
§ 63.7540(a)(18)	Requirements if you use a PM CPMS.	NA	NA
§ 63.7540(a)(19)	Requirements if you use a PM CEMS.	NA	NA

CITATION	BRIEF DESCRIPTION	APPLICABILITY DETERMINATION	CONDITION
§ 63.7540(b)	Requirement to report each instance in which you did not meet each emission limit and operating limit that apply to you.	NA	NA
§ 63.7540(c)	Requirement for mercury for units designed to burn gas 1 subcategory.	NA	NA
§ 63.7540(d)	Requirement to meet work practice standards according to items 5 and 6 of Table 3 for startup and shutdown.	NA	NA
<i>How do I demonstrate continuous compliance under the emissions averaging provision?</i>			
§ 63.7541	Requirements for units under the emissions averaging options in § 63.7522.	NA	NA
<i>What notifications must I submit and when?</i>			
§ 63.7545(a)	You must submit to the Administrator all notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (6), and 63.9(b) through (h) that apply to you by the dates specified.	NA	NA
§ 63.7545(b)	Requires affected sources with a startup date prior to January 31, 2013 to submit an Initial Notification not later than May 31, 2013.	Applicable. Not an ongoing requirement.	No ongoing requirements.
§ 63.7545(c)	Startup notification for new or reconstructed affected sources.	Not applicable	NA
§ 63.7545(d)	Requirement to submit a Notice of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin.	NA	NA
§ 63.7545(e)	Requirement to submit a Notice of Compliance Status (NOCS).	Applicable; items (e)(1) and (e)(8).	R16
§ 63.7545(f)	Requirement to submit a notification of alternative fuel use if during a period of natural gas curtailment or supply interruption, you intend to use a fuel other than those listed.	Applicable if triggered. However, facility is not permitted to use another fuel type and would need to apply for a NOC permit before they could use another fuel type.	NA
§ 63.7545(g)	Requirement to submit a notification if you intend to commence solid waste.	Applicable if triggered. However, facility is not permitted to use another fuel type and would need to apply for a NOC permit before they could use another fuel type.	NA
<i>What reports must I submit and when?</i>			
§ 63.7550(a)	You must submit each report in Table 9 that applies to you. (Compliance Report)	Applicable.	R13
§ 63.7550(b)	Requirement to submit each report according to paragraph (h) by the date in Table 9 and according to the requirements in paragraphs (b)(1) through (4). Includes a schedule (b)(5) for those not subject to any emission limits or operating limits.	Applicable	R12
§ 63.7550(c)	Requirements for the content of compliance report.	Applicable	R13
§ 63.7550(d)	Additional information required in compliance report for each deviation of an emission limit of operating limit at unit where you are not using CMS.	NA	NA
§ 63.7550(e)	Additional information required in compliance report for each deviation of an emission limit of operating limit at unit where you are using CMS.	NA	NA

CITATION	BRIEF DESCRIPTION	APPLICABILITY DETERMINATION	CONDITION
§ 63.7550(f)-(g)	[Reserved]	Not applicable	NA
§ 63.7550(h)(1)	Requires submittal of performance test results to EPA's WebFIRE database using CEDRI within 60 days of the source test.	NA	NA
§ 63.7550(h)(2)	Requires submittal of CEMS performance evaluation evaluation RATA data to CEDRI within 60 days of the source test within 60 days of the test.	NA	NA
§ 63.7550(h)(3)	Requires submittal of all reports in Table 9 (compliance report) electronically using CEDRI.	NA	NA
<i>What records must I keep?</i>			
§ 63.7555(a)	You must keep records of a copy of each notification and report that you submitted to comply with this subpart including supporting documentation. Records of performance tests, fuel analyses or other compliance demonstrations and performance demonstrations.	Applicable	RK18
§ 63.7555(b)	Requirements for records for CEMS, COMS, and continuous monitoring systems.	NA	NA
§ 63.7555(c)	Requirement to keep records required in Table 8.	NA	NA
§ 63.7555(d)	Requirement to keep records in paragraphs (d)(1) through (11) for units subject to an emission limit.	NA	NA
§ 63.7555(d)(1)	Records of monthly fuel use.	NA	NA
§ 63.7555(d)(2)	Required records for non-hazardous secondary materials.	NA	NA
§ 63.7555(d)(3)	Copy of calculations and supporting documentation of maximum chlorine fuel input.	NA	NA
§ 63.7555(d)(4)	Records of calculations and supporting documentation of maximum chlorine fuel input that were done to demonstrate continuous compliance with the HCl emission limit.	NA	NA
§ 63.7555(d)(5)	Records of calculations and supporting documentation of maximum mercury fuel input that were done to demonstrate continuous compliance with the mercury emission limit.	NA	NA
§ 63.7555(d)(6)	Required records if you choose to stack test less frequently than annually per § 63.7515(b).	NA	NA
§ 63.7555(d)(7)	Records of malfunctions.	NA	NA
§ 63.7555(d)(8)	Records of actions taken during malfunction to minimize emissions.	NA	NA
§ 63.7555(d)(9)	Records of calculations and supporting documentation of maximum TSM fuel input that were done to demonstrate continuous compliance with the TSM emission limit.	NA	NA
§ 63.7555(d)(10)	Requirement to maintain records of the calendar date, time occurrence and duration of each startup and shutdown.	NA	NA

CITATION	BRIEF DESCRIPTION	APPLICABILITY DETERMINATION	CONDITION
§ 63.7555(d)(11)	Requirement to maintain records of the type(s) and amount(s) of fuels used during each startup and shutdown.	NA	NA
§ 63.7555(d)(12)	Requirements for steam records if operator choose to rely on paragraph (2) of the definition of “startup” in §63.7575.	NA	NA
§ 63.7555(e)	Requirements for units under the emissions averaging options in § 63.7522.	NA	NA
§ 63.7555(f)	Requirements if you elect to use efficiency credits from energy conservation measures to demonstrate compliance according to § 63.7533.	NA	NA
§ 63.7555(g)	Requirement for mercury for units designed to burn gas 1 subcategory.	Not applicable. Unit not required to conduct fuel analyses.	NA
§ 63.7555(h)	Requirement for units in the unit designed to burn gas 1 subcategory.	Applicable if triggered. However, facility is not permitted to use another fuel type and would need to apply for a NOC permit before they could use another fuel type.	NA
<i>In what form and how long must I keep my records?</i>			
§ 63.7560(a)	Requirement to keep records in a form suitable and readily available for expeditious review according to §63.10(b)(1).	Applicable	RK18
§ 63.7560(b)	Requirement to keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.	Applicable	RK18
§ 63.7560(c)	Requirement to keep record on site or accessible from onsite for at least 2 years. Records may be kept off site for the remaining 3 years.	Applicable	RK18
<i>What parts of the General Provisions apply to me?</i>			
§ 63.7565	Table 10 contains applicability of General Provisions.	See Table 6.5 of the Technical Support Document	NA
<i>Who implements and enforces this subpart?</i>			
§ 63.7570	Details what agencies has implementation and enforcement authority over this subpart and what authorities are not delegated.	No applicable requirements	NA
<i>What definitions apply to this subpart?</i>			
§ 63.7575	Lists definitions for terms used in this subpart.	No applicable requirements	NA

6.4 Accidental Release Prevention Program

Section 112r of the Clean Air Act Amendments of 1990 require facilities using substances that pose the greatest risk of harm from accidental releases to develop and implement Risk Management Programs including:

- Hazard assessment that details the potential effects of an accidental release, an accident history of the last five years, and an evaluation of worst-case and alternative accidental releases scenarios;
- Prevention program that includes safety precautions and maintenance, monitoring, and employee training measures; and

- Emergency response program that spells out emergency health care, employee training measures and procedures for informing the public and response agencies (e.g., the fire department) should an accident occur.

Section 112r applies to stationary sources that manufacture, use, store, or otherwise handle more than a threshold quantity of a listed regulated substance in a process. Since SPI does not store or use any of the regulated substances listed in Section 112(r) of the Federal Clean Air Act above a threshold quantity, Section 112(r) requirements do not apply to SPI.

6.5 Prevention of Significant Deterioration (PSD)

The goal of the PSD program is to insure that construction of new major stationary sources and major modifications will not significantly degrade areas with pre-existing good air quality. Though the SPI Lumber Mill is a major source under the State's PSD program, SPI has not triggered a PSD review to date. The Department of Ecology, the PSD authority in Washington State, has determined that PSD review was not required for the lumber mill. Therefore, the mill was not required to obtain a PSD permit.

6.6 Compliance Assurance Monitoring (CAM) Rule

CAM applicability under §64.2(a) is determined on a pollutant by pollutant basis. CAM applies to a pollutant subject to an emissions limitation or standard when a control device is used to meet the limitation or standard and potential, pre-control device emissions are greater than a major source threshold. The CAM rule exempts backup utility units. Also, CAM does not apply to emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act, and emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method, as defined in §64.1.

EU1, EU2, and EU5 do not employ a control device. EU4 is not subject to a pollutant-specific emission limit. Therefore, none of these units are subject to the CAM Rule.

Planer Mill

EU3, the planer mill, is subject to a BACT limit for PM₁₀, uses a baghouse to control PM₁₀, and has a post-control estimated annual emission rate of 9.4 tons per year. Assuming at least 99 percent control efficiency, the pre-control emission rate is over 100 tons per year. Therefore, EU3 is subject to the CAM Rule. The previous AOP (08AOP625) required a CAM plan with this AOP (15AOP1084) renewal application, which was satisfied on February 13, 2015. Applicable sections from the CAM rule are summarized in Table 6.6 below.

Table 6.6: 40 CFR Part 64 Applicable Requirements

Part 64 Requirement Citation	Requirement (brief description)	Permit Condition
§64.7(b)	Requires proper maintenance of monitoring systems.	AR 3.4
§64.7(d)	Requires appropriate response to excursions or exceedances.	AR 3.5
§64.6(c)(4)	Requirements for minimum data recovery.	AR 3.6
§64.7(a)	Requirements for monitoring indicators.	AR 3.7
§64.9(b)(2)	General recordkeeping requirements.	RK15
§64.9(a)	General reporting requirements.	R4

6.7 State Greenhouse Gas (GHG) Reporting Rule

According to WAC 173-441-030(1), the State GHG Reporting Rule applies to industrial facilities that emit at least 10,000 metric tons per year of GHG in terms of carbon dioxide equivalents. WAC 173-441-020 defines a “facility” as any physical property, plant, building, structure, source, or stationary equipment located on one or more contiguous or adjacent properties in actual physical contact or separated solely by a public roadway or other public right of way and under common ownership or common control, that emits or may emit any greenhouse gas. Even though the lumbermill and cogeneration facilities are considered separate for Title V permitting purposes, they are considered one facility for the state GHG reporting rule. GHG emissions from the cogeneration portion of the facility alone are high enough to trigger GHG reporting. Therefore, the State GHG Reporting Rule applies to all portions of the facility and the applicable requirements are in the AOP.

7.0 Compliance History

ORCAA issued 15 notices of violation (NOV) to the lumber mill since it opened in 2003, as shown in Table 7.1. All NOV's issued up to the date of issuance of this permit have been resolved and are closed to further enforcement.

Table 7.1: Air Compliance History

DATE	NOV #	DESCRIPTION	RESOLUTION
5/29/2003	2035	Fallout of particulate matter beyond the property boundary	Paid \$1000 penalty in full
6/25/2003	2046	Fallout of particulate matter beyond the property boundary	Paid \$1000 penalty in full
7/1/2003	2048	Fallout of particulate matter beyond the property boundary	Settled on June 4, 2004: SPI agreed to pay \$10,000 with \$33,000 conditionally suspended
7/2/2003	2053	Fallout of particulate matter beyond the property boundary	
7/23/2003	2063	Fallout of particulate matter beyond the property boundary	
8/15/2003	2071	Fallout of particulate matter beyond the property boundary	
9/23/2003	2080	Fallout of particulate matter beyond the property boundary	
6/8/2005	2285	Fallout of particulate matter beyond the property boundary	Paid \$10,000 plus \$31,000 of \$33,000 previously suspended
9/13/2005	2329	Emission of an air contaminant detrimental to person or property	Paid \$400 in full
8/8/2006	2424	Failure to contain emission of an air contaminant	Paid \$1200 in full
9/27/2006	2427	Fallout of particulate matter beyond the property boundary	Paid \$1000 with \$9000 suspended
4/23/2007	2537	Reasonable precaution not taken to prevent particulate matter from becoming airborne	Paid \$5000 with \$5000 suspended
11/5/2007	2661	Failure to comply with condition #6 from Approval Order 06NOC490: Dust Management Plan	Paid \$8000 in full
5/16/2008	2722	Failure to comply with condition #6 from Approval Order 06NOC490: Dust Management Plan	Paid \$5000 with \$5000 suspended
3/14/2011	3086	Failure to submit a semi-annual monitoring report in a timely manner.	Paid \$1000 in full

8.0 Monitoring and Gap Filling

The monitoring conditions in Section VII of SPT's Aberdeen Lumber Mill AOP are, for the most part, standard conditions sufficient to fill gaps and determine the compliance status regarding the applicable requirements in Section VI of the AOP.

8.1 Monitoring Associated with the Package Boiler

Combustion of natural gas results in the emission of criteria pollutants, greenhouse gases, and small amounts of HAP and TAP. Record keeping conditions related to the quality and quantity of fuel combusted and complying with an operation and maintenance plan are generally considered to be sufficient to guarantee compliance with applicable standards for such a relatively small, gaseous fuel fired boiler.

Nevertheless, ORCAA maintains the authority to require emissions testing at any time. The test methods are defined in the applicable requirements. Furthermore, Conditions M1, M2, and M3 are gap filling conditions to verify compliance with the boiler's opacity limit.

8.2 Monitoring Associated with Lumber Drying

Emissions from lumber drying depend on the quantity of wood dried, the species of wood dried, and the temperature of the kiln.

Condition M10 requires continuous monitoring of the average temperature of each kiln while it is used to dry lumber. The origin of this condition is approval order 15ADM1089. Record keeping is sufficient to verify compliance with other applicable requirements which relate to the quantity of lumber that is kiln dried by species.

8.3 Monitoring Associated with the Planer Mill

Condition M9 is a gap filling condition that requires monitoring of the pressure drop across the baghouse that controls PM emissions from the planer mill dust collection system and ascribes a range of 1 – 5 inches of water.

Conditions M1, M2, and M3 are gap filling conditions to monitor opacity from the baghouse and fugitive emissions from the planer mill.

8.4 Monitoring Associated with Spray Application of Coatings

Because emissions from the spray application of brighteners and fungicides are calculated by mass balance calculations, record keeping of material applied is sufficient to ensure compliance with the applicable requirements.

9.0 Permit Renewal, Revocation, Reopening, and Revisions

9.1 Permit Renewal

This AOP has been issued with a fixed term of five years. Unless the permittee submits a complete permit renewal application no later than six months before the expiration date, this AOP will expire. If a complete application is received in a timely manner, this AOP will remain in effect until a new AOP is issued or the application is denied.

The same procedural requirements that apply to a new AOP apply to permit renewal, including public participation and affected state and EPA review.

If ORCAA denies an application for a permit renewal, the same procedure for permit revocation applies. Denial of a renewal application can be contested by filing an appeal with the Pollution Control Hearings Board and serving a copy upon ORCAA within 30 days of receipt of the denial.

9.2 Permit Revocation

ORCAA may revoke this AOP at the request of the permittee or for cause. At least 30 days prior to revocation, ORCAA will submit a written notice to the permittee explaining the basis for the revocation and allowing the permittee an opportunity to meet with ORCAA. ORCAA may issue conditional revocations with a future effective date.

Revocation of an AOP can be contested by filing an appeal with the Pollution Control Hearings Board and serving a copy upon ORCAA within 30 days of receipt of the denial.

9.3 Opening for Cause

ORCAA will reopen and revise this AOP if any of the following occurs:

1. Additional requirements become applicable and the remaining permit term is 3 years or longer.
2. Additional requirements become applicable under the acid rain program.
3. ORCAA or the EPA determines that the AOP contains a material mistake or inaccurate information was used to set any of the terms or conditions of the permit.
4. ORCAA or the EPA determines that the AOP must be revised to assure compliance with any applicable requirement.

ORCAA will provide the permittee at least 30 days written notice before reopening an AOP for cause, unless an emergency requires a shorter time period. The same procedural requirements that apply to a new AOP apply to reopening and reissuing an AOP, including public participation and affected state and EPA review, except that only those parts of the permit that have been modified are affected.

9.4 Administrative Permit Amendments

An administrative permit amendment is a permit revision that:

1. Corrects typographical errors;
2. Identifies a name change, contact information, or similar administrative change;
3. Requires more frequent monitoring or record keeping;
4. Allows for a change in ownership or control; or
5. Incorporates conditions from a Notice of Construction (NOC), provided the NOC approval process substantially meets the same requirements as an AOP modification and no gap filling is required to verify compliance.

The permittee may request an administrative amendment, which ORCAA will either incorporate into the permit or deny within 60 days. ORCAA will then submit the revised permit to EPA.

9.5 Changes not Requiring Permit Revisions

The permittee may make a change at an AOP applicable facility without a permit revision if all of the following conditions are met:

1. The proposed changes are not Title 1 modifications;
2. The proposed changes do not result in an increase in emissions, either a rate or a total, beyond what is allowed by the permit;
3. The proposed changes do not alter permit terms required to enforce limitation on emissions from emission units covered by the permit; and
4. The permittee provides ORCAA and EPA written notification of the proposed changes at least 7 days prior to making the changes, unless an emergency requires swifter action.

A Title 1 modification is defined as any modification subject to a Part 111 standard (NSPS) or a Part 112 standard (NESHAP) or is subject to preconstruction review under the PSD program or in a nonattainment area.

9.6 Minor Permit Modifications

A change that does require a permit revision may be classified as a minor permit modification if it meets the following conditions:

1. No applicable requirements are violated;
2. There are no *significant* changes to monitoring, reporting, or record keeping requirements;
3. There are no changes to case-by-case determinations regarding an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. The changes do not establish or change a permit term or condition assumed by the source for the purpose of avoiding an applicable requirement; and
5. No Title 1 modifications are proposed.

As stated in section 9.5, a Title 1 modification is defined as any modification subject to a Part 111 standard (NSPS) or a Part 112 standard (NESHAP) or is subject to preconstruction review under the PSD program or in a nonattainment area.

Requests for minor permit modifications must be made on official forms supplied by ORCAA and certified by a responsible official. Once ORCAA declares the application complete, it is ORCAA's responsibility to notify the EPA administrator and affected states and post notice on the Permit Register, which initiates a 21-day comment period.

Within 90 days of receiving an application for a minor permit modification or within 15 days after the end of EPA's 45-day review period, whichever comes last, ORCAA shall either:

1. Issue the modification as proposed;
2. Deny the proposed modification;
3. Determine that the proposed modification should be resubmitted as a major permit modification; or
4. Revise the draft permit modification and transmit to EPA.

The permittee may make the proposed changes immediately upon requesting the modification (unless a NOC is required). However, the permittee must continue to comply with the applicable requirements governing the change and the proposed terms and conditions. During this time period,

the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the source fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it.

9.7 Major Permit Modifications

A change that does require a permit revision and does not qualify as a minor permit modification is a major permit modifications. Every significant change in existing monitoring permit terms or conditions and every relaxation of reporting or recordkeeping permit terms or conditions shall be considered significant. Major permit modifications must meet all the requirements of Chapter 173-401 WAC, including those for applications, public participation, review by affected states, and review by EPA, as they apply to permit issuance and permit renewal. ORCAA shall complete review on the majority of significant permit modifications within 9 months after receipt of a complete application.

10.0 Regulatory Basis

Table 10.1 provides the regulatory basis for each permit condition as required by WAC 173-401-600(2) and §70.6(a)(1).

Table 10.1: Statement of Basis

CONDITION	REGULATORY BASIS
Permit Terms and Provisions	
P1. Permit Duration	Permit Terms and Provisions Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-610
P2. Federally Enforceable Requirements	Permit Terms and Provisions Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-625
P3. Compliance Maintenance	Permit Terms and Provisions Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-510(2)(h)(iii); WAC 173-401-630(3)
P4. Standard Conditions	Permit Terms and Provisions Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-620(2)
P5. Duty to Supplement or Correct Application	Permit Terms and Provisions Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-500(6)
P6. False or Misleading Statements	Permit Terms and Provisions Authority: WAC 173-401-600(1)(b) Origin: <i>State/Local only</i> : WAC 173-400-105; <i>Local only</i> : ORCAA 7.2
P7. Permit Renewal Application	Permit Terms and Provisions Authority: WAC 173-401-710(1) Origin: WAC 173-401-710(1)
P8. Permit Expiration – Application Shield	Permit Terms and Provisions Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-710(3)
P9. Permit Revocation	Permit Terms and Provisions Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-710(4)
P10. Reopening for Cause	Permit Terms and Provisions Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-730
P11. Changes not Requiring Permit Revision/Off Permit Changes	Permit Terms and Provisions Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-722; WAC 173-401-724
P12. Administrative Permit Amendments	Permit Terms and Provisions Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-720
P13. Permit Modifications	Permit Terms and Provisions Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-725
P14. Greenhouse Gas Reporting Fee	Permit Terms and Provisions Authority: WAC 173-401-600(1)(b) Origin: WAC 173-441-110 <i>state/local only</i>

Table 10.1: Statement of Basis - *continued*

CONDITION	REGULATORY BASIS
P15. Confidential Information	Permit Terms and Provisions Authority: WAC 173-401-600(1)(a)&(b) Origin: WAC 173-401-500(5); <i>Local only</i> : ORCAA Rule 1.6; WAC 173-401-630(1)
P16. Credible Evidence	Permit Terms and Provisions Authority: WAC 173-401-600(1)(a) Origin: 40 CFR 60.11
P17. Emergency as Affirmative Defense	Permit Terms and Provisions Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-645
P18. Unavoidable Excess Emissions Excused	Permit Terms and Provisions Authority: WAC 173-401-600(1)(b) Origin: WAC 173-400-107(6); <i>Local Only</i> : ORCAA 8.7(c)
General Terms and Conditions	
G1. Inspection and Entry	General Terms and Conditions Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-630(2)
G2. Access for Inspection	General Terms and Conditions Authority: WAC 173-401-600(1)(b) Origin: ORCAA 1.5(e) <i>state/local only</i>
G3. Insignificant Emission Unit - Restriction	General Terms and Conditions Authority: WAC 173-401-600(1)(a) Origin: WAC 173-401-530
G4. New Source Review	General Terms and Conditions Authority: WAC 173-401-600(1)(b) Origin: <i>Local Only</i> : ORCAA 6.1
G5. Replacement or Substantial Alteration of Existing Control Equipment	General Terms and Conditions Authority: WAC 173-401-600(1)(b) Origin: <i>Local Only</i> : ORCAA 6.1.10
G6. Temporary Sources	General Terms and Conditions Authority: WAC 173-401-600(1)(a)&(b) Origin: WAC 173-401-635; ORCAA 6.1.1; WAC 173-401-635
G7. Demolition and Asbestos Projects	General Terms and Conditions Authority: WAC 173-401-600(1)(b) Origin: ORCAA 6.3 <i>state/local only</i>
G8. Demolition and Renovation Projects	General Terms and Conditions Authority: WAC 173-401-600(1)(a) Origin: 40 CFR Part 61, Subpart M
G9. Protection of Stratospheric Ozone	General Terms and Conditions Authority: WAC 173-401-600(1)(a) Origin: 40 CFR Part 82, Subparts B & F
G10. Prohibition of Emissions Detrimental to Persons or Property	General Terms and Conditions Authority: WAC 173-401-600(1)(b) Origin: <i>State/Local Only</i> : WAC 173-400-040(6); <i>Local Only</i> : ORCAA 7.6 <i>state/local only</i>
G11. Concealment and Masking Prohibited	General Terms and Conditions Authority: WAC 173-401-600(1)(b) Origin: <i>State/Local Only</i> : WAC 173-400-040(8); <i>Local Only</i> : ORCAA 7.5 <i>state/local only</i>
Applicable Plant-Wide Requirements	
PW1. Fallout	Applicable Plant-wide Requirements Authority: WAC 173-401-600(1)(b) Origin: <i>State/Local Only</i> : WAC 173-400-040(3); <i>Local Only</i> : ORCAA 8.3(e)

Table 10.1: Statement of Basis - *continued*

CONDITION	REGULATORY BASIS
PW2. Odor Control (state)	Applicable Plant-wide Requirements Authority: WAC 173-401-600(1)(b) Origin: <i>State Only</i> : WAC 173-400-040(5)
PW3. Odor Control (ORCAA)	Applicable Plant-wide Requirements Authority: <i>State/Local Only</i> : WAC 173-401-600(1)(b) Origin: <i>Local Only</i> : ORCAA 8.5
PW4. Fugitive Emissions Control	Applicable Plant-wide Requirements Authority: WAC 173-401-600(1)(b) Origin: WAC 173-400-040(4)(a)
PW5. Fugitive Dust Control	Applicable Plant-wide Requirements Authority: WAC 173-401-600(1)(b) Origin: <i>State/Local Only</i> : WAC 173-400-040(9)(a); <i>Local Only</i> : ORCAA 8.3(c)
PW6. Maintenance and Repair of Air Pollution Control Equipment and Processes	Applicable Plant-wide Requirements Authority: WAC 173-401-600(1)(b) Origin: ORCAA 8.8 <i>state/local only</i>
PW7. General Standards for Maximum Visual Emissions	Applicable Plant-wide Requirements Authority: WAC 173-401-600(1)(b) Origin: WAC 173-400-040(2); ORCAA 8.2 <i>state/local only</i>
PW8. Sulfur Dioxide	Applicable Plant-wide Requirements Authority: WAC 173-401-600(1)(b) Origin: WAC 173-400-040(7)
PW10. General Particulate Standards for Combustion Units (ORCAA)	Applicable Plant-wide Requirements Authority: WAC 173-401-600(1)(b) Origin: ORCAA 8.3(a) & (b) <i>state/local only</i>
PW11. General Emission Standards for Process Units	Applicable Plant-wide Requirements Authority: WAC 173-401-600(1)(b) Origin: WAC 173-400-060
PW12. Dust Management Plan	Applicable Plant-wide Requirements Authority: WAC 173-401-600(1)(c) Origin: WAC 173-400-040(4)&(9); ORCAA 8.3 <i>State/local only</i>
PW13. Production Limitation	Applicable Plant-wide Requirements Authority: WAC 173-401-600(1)(c) Origin: 15ADM1089 Condition#2
PW14. Operation and Maintenance Plan	Applicable Requirement Authority: WAC 173-401-605 Origin: 01NOC192 Condition #9
Applicable Requirements for Boiler (EU1)	
AR1.1. Boiler NOx Limit	Applicable Requirement Authority: WAC 173-401-605 Origin: 01NOC192 Condition #1
AR1.2. Boiler CO Limit	Applicable Requirement Authority: WAC 173-401-605 Origin: 01NOC192 Condition #2
AR1.3. Boiler Opacity Limit	Applicable Requirement Authority: WAC 173-401-605 Origin: 01NOC192 Condition #3
AR1.4. Fuel Requirements	Applicable Requirement Authority: WAC 173-401-600(1)(c) Origin: 01NOC192 Condition #5
AR1.5. Annual Tune-Up	Applicable Requirement Authority: WAC 173-401-605 Origin: § 63.52(f); §63.7540(a)(10)(i-vi)

Table 10.1: Statement of Basis - *continued*

CONDITION	REGULATORY BASIS
AR1.6. Boiler Tune-Up Scheduling	Applicable Requirement Authority: WAC 173-401-605 Origin: § 63.7515(d)
Applicable Requirements for Lumber Kilns (EU2)	
AR2.1. Production Limitation	Applicable Requirement Authority: WAC 173-401-605 Origin: 15ADM1089, Condition #2
AR2.2. Material Limitation	Applicable Requirement Authority: WAC 173-401-605 Origin: 15ADM1089, Condition #3
AR2.3. Kiln Temperature Limitation	Applicable Requirement Authority: WAC 173-401-605 Origin: 15ADM1089, Condition #4
AR2.4. O&M Plan	Applicable Requirement Authority: WAC 173-401-605 Origin: 15ADM1089, Condition#7
Applicable Requirements for Planer Mill (EU3)	
AR3.1. Stack Exhaust	Applicable Requirement Authority: WAC 173-401-605 Origin: 04NOC392, Condition #2
AR3.2. Monitoring	Applicable Requirement Authority: WAC 173-401-605 Origin: 04NOC392, Condition #3
AR3.3. Opacity Limit	Applicable Requirement Authority: WAC 173-401-605 Origin: 04NOC392, Condition #4
AR3.4. O&M Plan	Applicable Requirement Authority: WAC 173-401-605 Origin: 04NOC392, Condition #5; §64.7(b)
AR3.5. Response to Excursions	Applicable Requirement Authority: WAC 173-401-605 Origin: §64.7(d)
Applicable Requirements for the Spray Coating System (EU4)	
AR4.1. Material Use	Applicable Requirement Authority: WAC 173-401-605 Origin: 02NOC268, Condition #1
AR4.2. Stack Specifications	Applicable Requirement Authority: WAC 173-401-605 Origin: 02NOC268, Condition #3
AR4.3. O&M	Applicable Requirement Authority: WAC 173-401-605 Origin: 02NOC268, Condition #4
AR4.4. VOC Emissions	Applicable Requirement Authority: WAC 173-401-605 Origin: 02NOC268, Condition #5
Applicable Requirements for Diesel Engine Powering Emergency Fire Pump (EU5)	
AR5.1. Engine Maintenance	Applicable Requirement Authority: WAC 173-401-605 Origin: Table 2c to 40CFR Part 63 Subpart ZZZZ
AR5.2. Operation and Maintenance	Applicable Requirement Authority: WAC 173-401-605 Origin: §63.6625(e)(2)

Table 10.1: Statement of Basis - *continued*

CONDITION	REGULATORY BASIS
AR5.3. Hour Meter	Applicable Requirement Authority: WAC 173-401-605 Origin: §63.6625(f)
AR5.4. Hours of Operation	Applicable Requirement Authority: WAC 173-401-605 Origin: §63.6640(f)
Monitoring Terms and Conditions	
M1. Opacity Surveys	Applicable Requirement Authority: WAC 173-401-615 Origin: WAC 173-401-615(1)(b)
M2. Compliance Demonstration Required	Applicable Requirement Authority: WAC 173-401-615 Origin: WAC 173-401-615(1)(b)
M3. Opacity Reading Procedures	Applicable Requirement Authority: WAC 173-401-615 Origin: WAC 173-401-615(1)(b)
M4. Complaint Monitoring	Applicable Requirement Authority: WAC 173-401-615 Origin: WAC 173-401-615(1)(b)
M5. GHG Monitoring Requirements	Applicable Requirement Authority: WAC 173-401-615 Origin: Chapter 173-441 WAC: <i>State only</i>
M6. Sulfur Dioxide Emissions Monitoring	Applicable Requirement Authority: WAC 173-401-615 Origin: WAC 173-401-615(1)(b)
M7. General Source Testing Procedures and Methods	Applicable Requirement Authority: WAC 173-401-615 Origin: <i>Local Only</i> : ORCAA 1.5(j)
M8. Fugitive Emissions and Dust Control Monitoring	Applicable Requirement Authority: WAC 173-401-615 Origin: WAC 173-401-615(1)(b)
M9. Compliance Assurance Monitoring	Applicable Requirement Authority: WAC 173-401-615 Origin: WAC 173-401-615(1)(b); 40 CFR Part 64, §64.8, §64.6(c)(4), §64.7(a)
M10. Kiln Temperature Monitoring	Applicable Requirement Authority: WAC 173-401-615 Origin: 15ADM1089, Condition #4
Recordkeeping Conditions	
RK1. Retention and Availability of Records	Recordkeeping Conditions Authority: WAC 173-401-615 Origin: WAC 173-401-615(2)(c)
RK2. Record of Changes	Recordkeeping Conditions Authority: WAC 173-401-615 Origin: WAC 173-401-615 (2)(b); WAC 173-401-724(5)
RK3. Monitoring Records – General Requirements	Recordkeeping Conditions Authority: WAC 173-401-615 Origin: WAC 173-401-615(2)(a)
RK4. Record of Permit Deviations	Recordkeeping Conditions Authority: WAC 173-401-615 Origin: WAC 173-401-615(3)(b); §64.9(b)(2)
RK5. Availability of Emissions Records	Recordkeeping Conditions Authority: WAC 173-401-615 Origin: <i>Local Only</i> : ORCAA 8.11(b)

Table 10.1: Statement of Basis - *continued*

CONDITION	REGULATORY BASIS
RK6. Emissions Records	Recordkeeping Conditions Authority: WAC 173-401-615 Origin: <i>Local Only</i> : ORCAA 8.11(a)
RK7. Unlawful Reproduction or Alteration of Documents	Recordkeeping Conditions Authority: WAC 173-401-615 Origin: <i>Local Only</i> : ORCAA 7.3
RK8. Display of Orders, Certificates and Other Notices	Recordkeeping Conditions Authority: WAC 173-401-615 Origin: <i>Local Only</i> : ORCAA 7.4
RK9. Record of Complaints	Recordkeeping Conditions Authority: WAC 173-401-615 Origin: WAC 173-401-615(2)(a)
RK10. Record of Actions Taken to Maintain Air Pollution Control Equipment	Recordkeeping Conditions Authority: WAC 173-401-615 Origin: WAC 173-401-615(2)(a)
RK11. MACT Applicability Records	Recordkeeping Conditions Authority: WAC 173-401-615 Origin: 40 CFR 63.1(b)(3); §63.10(b)(3)
RK12. Copies of Required Approval Orders and O&M Plans	Recordkeeping Conditions Authority: WAC 173-401-615 Origin: 01NOC192, Condition #6; 02NOC268, Condition #6; 04NOC392, Condition #6
RK13. Record Keeping	Recordkeeping Conditions Authority: WAC 173-401-615 Origin: 15ADM1089, Condition #5
RK14. Records Required for Greenhouse Gas Reporting	Recordkeeping Conditions Authority: WAC 173-401-615 Origin: WAC 173-441-050(6) <i>State only</i>
RK15. Paperless Records	Recordkeeping Conditions Authority: WAC 173-401-615 Origin: §64.9(b)(2)
RK16. Records of Startup, Shutdown, and Malfunction of the Package Boiler	Recordkeeping Conditions Authority: WAC 173-401-615 Origin: §60.7(b); §63.10(b)(2)
RK17. Fuel Consumption in the Boiler	Recordkeeping Conditions Authority: WAC 173-401-615 Origin: 01NOC192, Condition #5; §60.48c(g)
RK18. Boiler Records	Recordkeeping Conditions Authority: WAC 173-401-615 Origin: §63.10, §63.7555(a), § 63.7560(a-c)
RK19. Records of Boiler Maintenance	Recordkeeping Conditions Authority: WAC 173-401-615 Origin: §63.52(f); §63.10(b)(2)(vii)
RK20. VOC-Containing Material Use	Recordkeeping Conditions Authority: WAC 173-401-615 Origin: 02NOC268, Condition #2
Reporting Conditions	
R1. Certification of Reports	Reporting Conditions Authority: WAC 173-401-615 Origin: WAC 173-401-520; WAC 173-401-615(3)(a); WAC 173-401-630(1); §63.2520(e)(2)
R2. Annual Compliance Certification	Reporting Conditions Authority: WAC 173-401-615 Origin: WAC 173-401-630(5)

Table 10.1: Statement of Basis - *continued*

CONDITION	REGULATORY BASIS
R3. Confidential Information	Reporting Conditions Authority: WAC 173-401-615 Origin: <i>Local Only</i> ; ORCAA 1.6
R4. Semi-annual Monitoring Reports	Reporting Conditions Authority: WAC 173-401-615 Origin: WAC 173-401-615(3)(a); §64.9(a); WAC 173-401-615(1)(a)
R5. Reporting Deviations from Permit Conditions	Reporting Conditions Authority: WAC 173-401-615 Origin: 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 Malfunctions	Reporting Conditions Authority: WAC 173-401-615 Origin: WAC 173-401-615(3)
R7. Notification of Complaint Received	Reporting Conditions Authority: WAC 173-401-615 Origin: WAC 173-401-615(3)
R8. Annual Inventory Report	Reporting Conditions Authority: WAC 173-401-615 Origin: WAC 173-400-105(1); ORCAA 8.11; WAC 173-401-615(1)(a)
R9. Notification of Performance Testing	Reporting Conditions Authority: WAC 173-401-615 Origin: WAC 173-401-630(1); §63.9(e)
R10. Reporting Results of Performance Testing	Reporting Conditions Authority: WAC 173-401-615 Origin: WAC 173-401-630(1); WAC 173-401-615(1)(a); §63.7515(d); §63.7550]
R11. State Greenhouse Gas Reporting	Reporting Conditions Authority: WAC 173-401-615 Origin: Chapter 173-441 WAC: <i>State Only</i>
R12 Notification of Need for Improved Monitoring	Reporting Conditions Authority: WAC 173-401-615 Origin: §64.7(e)
R13. Reporting Excess Emissions	Reporting Conditions Authority: WAC 173-401-600(1)(c) Origin: 15ADM1089 Condition#8
R14. Notification Requirements	Reporting Conditions Authority: WAC 173-401-615 Origin: § 63.9(a)(4)(i), §63.10 (a)(4), § 63.7550(b)
R15. Annual Boiler Tune-Up Compliance Reporting	Reporting Conditions Authority: WAC 173-401-615 Origin: § 63.7550(a,c)
R16. One-Time Requirement for Notice of Compliance Statement (NOCS) and Compliance Demonstration.	Reporting Conditions Authority: WAC 173-401-605 Origin: §63.9(h), §63.7510(e), §63.7530(e), §63.7530(f), §63.7545(e)(1,8)
Permit Shield Conditions	
S1. Permit Shield	Permit Shield Conditions Authority: WAC 173-401-615 Origin: WAC 173-401-640(1)
S2. Inapplicable or Exempt Requirements	Permit Shield Conditions Authority: WAC 173-401-615 Origin: WAC 173-401-640
S3. Exclusions	Permit Shield Conditions Authority: WAC 173-401-615 Origin: WAC 173-401-640

