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ORCAA



August 30, 2018

To:

Mark Goodin
Olympic Regional Clean Air Agency
2940 Limited Lane NW
Olympia, WA 98502

Copy to:

U.S. EPA Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

RE: McKinley Paper AOP Renewal Application (Permit No. 11AOP816)

Dear Mr. Goodin:

McKinley Paper is submitting the AOP Renewal Application for AOP Permit No. 11AOP816. The facility is located at 1902 Marine Drive in Port Angeles.

In early 2017, McKinley Paper Company purchased and curtailed the mill and has since been evaluating capital improvements. Capital improvement planning is ongoing and McKinley Paper may need to provide updates to this AOP application.

As decisions regarding capital improvements are made, McKinley Paper will promptly update ORCAA and submit amendments to the AOP renewal application as needed.

McKinley Paper requests a written response from ORCAA regarding the completeness of this permit renewal application.

Sincerely,

A handwritten signature in blue ink that reads "Amy Dougherty". The signature is written in a cursive, flowing style.

Amy Dougherty
Purchasing Manager
McKinley Paper Co, Washington Mill
amy.dougherty@biopappel.com
360-565-7019



ORCAA AOP RENEWAL APPLICATION General Instructions and Checklist

Air operating permits (AOPs) are issued for a term of five years. After five years, the AOP must be reissued or "renewed."

IMPORTANT: ORCAA must receive a complete application by the due date listed in your current permit. Upon receiving an application, ORCAA has 60 days to determine whether it is complete. If ORCAA determines that an application is not complete within 60 days of receiving the application, ORCAA will notify the source in writing. Any notification of incompleteness will specify what information is needed to make the application complete, and give a reasonable time frame for the applicant to respond. **ORCAA recommends that you submit your renewal application 90 days prior to the due date to assure that a complete application is received by the due date.** ORCAA has 18 months from receipt of your renewal application to issue a renewal permit. Submitting a timely and complete renewal application will give you an "application shield" to allow you to operate under your current permit (even after it's expired) until a final permit is issued. To maintain the "application shield" the applicant must also submit any requested additional information by the deadline specified by ORCAA.

Submit a complete application to ORCAA and send a copy to EPA.

ORCAA
2940 Limited Lane NW Suite B
Olympia, WA 98502

U.S. EPA Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Your AOP Renewal Application should include the following¹:

- Form A: General Information
- Form B: Emission Units
- Form C: Emissions
- Emission calculations used to complete Form C.
- Form D: Applicability Determinations

The following, if identified in Form C:

- CAM Plan

The following, if identified in Form D:

- Form E: NOC Approval Orders
- Form F: Off-Permit/502(b)(10) Changes
- Form G: NOC Not Required
- Form H: New Requirements
- Form I: Requested Changes
- Compliance plan



Note: If the application contains any confidential business information, please complete a Request of Confidentiality of Records (www.orcaa.org/forms). Confidentiality can be claimed for information unique to the applicant and/or likely to adversely affect the competitive position of the applicant if released to the public or a competitor.

¹ Specific instructions for each item are listed in the Instructions sections at the end of this document.

OLYMPIC REGION CLEAN AIR AGENCY

2940 B Limited Lane NW - Olympia, Washington 98502 - 360-539-7610 – Fax 360-491-6308

**AIR OPERATING PERMIT (AOP)
RENEWAL APPLICATION
Form A: General Information**

Company Name: McKinley Paper Company		For ORCAA use only	
Plant Name: McKinley Paper Company		File No: 153	County No: 9
Physical Address: 1902 Marine View Drive, Port Angeles, WA 98363		Source No: 7	Application No: 18AOP 1200
Mailing Address (if different from above): 1815 Marine Drive, Port Angeles, WA 98363		Date Received: RECEIVED SEP 04 2018 ORCAA	
Current AOP Number: 11AOP816			
Issuance Date: November 12, 2014		Expiration Date: November 12, 2019	
Owner's name and agent:			
Plant site manager/contact: Amy Dougherty			
Title: Purchasing Manager 	Phone: 360-565-7019	Email: adougherty@biopappel.com	
RESPONSIBLE OFFICIAL CERTIFICATION			
I certify that I am the responsible official, as defined in WAC 173-401-200(27) for this facility. I further certify as required by WAC 173-401-520, that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.			
Responsible Official: Isaac Rosas			
Title: General Manager	Phone: 505-972-2146	Email: irosas@biopappel.com	
Address: 1815 Marine Drive, Port Angeles, WA 98362			
Signature: 		Date: 8/16/18	

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**AIR OPERATING PERMIT (AOP) RENEWAL APPLICATION
Form B: Emissions Units**

Emissions Unit Number	Emissions Unit Name & Description	Air Pollution Control Equipment	Fuel(s) Used	Significant or Insignificant WAC 173-401-530 through -533	
				(S or I)	Basis
EU1	#2 & #3 Refiner Lines <ul style="list-style-type: none"> • Main process for manufacturing mechanical pulp • Bleaching chemical: sodium hydrosulfite • Line 3: total power 32,000 HP • Line 2: total power 32,000 HP • Processing rate: 200-250 tons/day • Raw materials: coniferous and deciduous wood species • Yield: 95% of incoming fiber mass 	None		<input checked="" type="checkbox"/> S <input type="checkbox"/> I	
#8 Boiler was decommissioned in January 2016 and is not recognized as an emissions unit (former EU2)				<input checked="" type="checkbox"/> S <input type="checkbox"/> I	
EU3	#9 Boiler <ul style="list-style-type: none"> • Babcock and Wilcox type FM water tube boiler • Rated at 157 MMbtu/hr (100,000 lbs/hr) • Fuel: #6 fuel oil • Max pressure: 300 psig • Working pressure: 225 psig 	No mechanical devices, sulfur dioxide limitation met by sulfur content in oil		<input checked="" type="checkbox"/> S <input type="checkbox"/> I	
EU4	#10 Boiler <ul style="list-style-type: none"> • Babcock and Wilcox type FM water tube boiler • Rated 157 MMbtu/hr (100,000 lbs/hr) • Fuel: #6 fuel oil • Max pressure: 300 psig • Working pressure: 225 psig 	No mechanical devices, sulfur dioxide limitation met by sulfur content in oil		<input checked="" type="checkbox"/> S <input type="checkbox"/> I	
EU5	Deinking Plant: <ul style="list-style-type: none"> • Fugitive source of Volatile Organic Compounds (VOC) including Toxic Air Pollutants (TAP) and Hazardous Air Pollutants (HAP) • Constructed in 1992 	None		<input checked="" type="checkbox"/> S <input type="checkbox"/> I	

Emissions Unit Number	Emissions Unit Name & Description	Air Pollution Control Equipment	Fuel(s) Used	Significant or Insignificant WAC 173-401-530 through -533	
				(S or I)	Basis
EU6	Paper Machines: • Fugitive source of Volatile Organic Compounds (VOC) including Toxic Air Pollutants (TAP) and Hazardous Air Pollutants (HAP) • Constructed in 1920s	None		<input checked="" type="checkbox"/> S <input type="checkbox"/> I	
EU7	Wastewater Treatment Plant: • Fugitive source of Volatile Organic Compounds (VOC) including Toxic Air Pollutants (TAP) and Hazardous Air Pollutants (HAP) and methanol	None		<input checked="" type="checkbox"/> S <input type="checkbox"/> I	
EU8	Boiler #11: • Detroit Stoker, vibrating grate boiler meeting the definition of a hybrid suspension grate boiler in §63.7575. • Rated at 420 MMBtu/hr heat input (gross) • Designed to produce 225,000 lb/hr of saturated steam at 900 ps _g • Combusts clean woody biomass including hog fuel, recycled wood-derived fuel, dewatered clarifier sludge, natural gas and diesel.	• Selective non-catalytic reduction system (SNCR) for control of NO _x • Electrostatic Precipitator (ESP) for control of particulate	• Condensing economizer for control of acid gases and particulate	<input checked="" type="checkbox"/> S <input type="checkbox"/> I	
EU9	Cogen Cooling Tower: • Two-cell cooling tower 5,500 gallons per minute	Cooling tower drift eliminators		<input checked="" type="checkbox"/> S <input type="checkbox"/> I	
EU10	Gasoline Dispensing: • 300 gallon above ground gasoline storage tank • Not equipped with vapor recovery	None		<input checked="" type="checkbox"/> S <input type="checkbox"/> I	
EU11	Portable Temporary Generators: • 40 CFR Part 89 compliant • Temporary (< 12-months)	None		<input checked="" type="checkbox"/> S <input type="checkbox"/> I	
EU12	Landfill: • 7 acre landfill • Used to landfill boiler ash	Passive, landfill gas collection system		<input checked="" type="checkbox"/> S <input type="checkbox"/> I	
IEU1	Loadout of wood residuals and ash	NA	NA	<input type="checkbox"/> S <input checked="" type="checkbox"/> I	
IEU2	Lubricating Oil Storage Tank	NA	NA	<input type="checkbox"/> S <input checked="" type="checkbox"/> I	Categorically Exempt WAC 173-401-532(3)
IEU3	Storage of pressurized gas	NA	NA	<input type="checkbox"/> S <input checked="" type="checkbox"/> I	Categorically Exempt WAC 173-401-532(5)
IEU4	Maintenance shops	NA	NA	<input type="checkbox"/> S <input checked="" type="checkbox"/> I	Categorically Exempt WAC 173-401-532(7)

Emissions Unit Number	Emissions Unit Name & Description	Air Pollution Control Equipment	Fuel(s) Used	Significant or Insignificant WAC 173-401-530 through -533	
				(S or I)	Basis
IEU5	Building vents	NA	NA	<input type="checkbox"/> S <input checked="" type="checkbox"/> I	Categorically Exempt WAC 173-401-532(9)
IEU6	Vehicle internal combustion engines	NA	NA	<input type="checkbox"/> S <input checked="" type="checkbox"/> I	Categorically Exempt WAC 173-401-532(10)
IEU7	Welding operations	NA	NA	<input type="checkbox"/> S <input checked="" type="checkbox"/> I	Categorically Exempt WAC 173-401-532(12)
IEU8	Plant upkeep operations	NA	NA	<input type="checkbox"/> S <input checked="" type="checkbox"/> I	Categorically Exempt WAC 173-401-532(33)
IEU9	Pavement cleaning and sweeping	NA	NA	<input type="checkbox"/> S <input checked="" type="checkbox"/> I	Categorically Exempt WAC 173-401-532(35)
IEU10	Food preparation	NA	NA	<input type="checkbox"/> S <input checked="" type="checkbox"/> I	Categorically Exempt WAC 173-401-532(41)
IEU11	Portable drums and totes	NA	NA	<input type="checkbox"/> S <input checked="" type="checkbox"/> I	Categorically Exempt WAC 173-401-532(42)
IEU12	Landscaping activities	NA	NA	<input type="checkbox"/> S <input checked="" type="checkbox"/> I	Categorically Exempt WAC 173-401-532(43)
IEU13	General vehicle maintenance	NA	NA	<input type="checkbox"/> S <input checked="" type="checkbox"/> I	Categorically Exempt WAC 173-401-532(45)
IEU14	Comfort air conditioning	NA	NA	<input type="checkbox"/> S <input checked="" type="checkbox"/> I	Categorically Exempt WAC 173-401-532(46)
IEU15	Office activities	NA	NA	<input type="checkbox"/> S <input checked="" type="checkbox"/> I	Categorically Exempt WAC 173-401-532(49)
IEU16	Sampling connections	NA	NA	<input type="checkbox"/> S <input checked="" type="checkbox"/> I	Categorically Exempt WAC 173-401-532(51)
IEU17	Parking lot exhaust	NA	NA	<input type="checkbox"/> S <input checked="" type="checkbox"/> I	Categorically Exempt WAC 173-401-532(54)
IEU18	Indoor mechanical operations not resulting in emissions	NA	NA	<input type="checkbox"/> S <input checked="" type="checkbox"/> I	Categorically Exempt WAC 173-401-532(55)
IEU19	Repair and maintenance activities	NA	NA	<input type="checkbox"/> S <input checked="" type="checkbox"/> I	Categorically Exempt WAC 173-401-532(74)
IEU20	Totally closed conveyors	NA	NA	<input type="checkbox"/> S <input checked="" type="checkbox"/> I	Categorically Exempt WAC 173-401-532(86)
IEU21	Air compressors and pneumatically operated equipment	NA	NA	<input type="checkbox"/> S <input checked="" type="checkbox"/> I	Categorically Exempt WAC 173-401-532(88)
IEU22	Steam leaks	NA	NA	<input type="checkbox"/> S <input checked="" type="checkbox"/> I	Categorically Exempt WAC 173-401-532(89)
IEU23	Vacuum system exhaust	NA	NA	<input type="checkbox"/> S <input checked="" type="checkbox"/> I	Categorically Exempt WAC 173-401-532(108)

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**AIR OPERATING PERMIT (AOP) RENEWAL APPLICATION
Form C: Emissions**

Emissions Unit Number (from Form B)	Pollutants (all regulated pollutants including greenhouse gases)	Emissions			CAM Applicability	
		Annual Potential Emissions (for each regulated air pollutants)	Have Potential Emissions Changed Since Submittal of Most Recent AOP Application?	Actual Emissions for Calendar Year 2016_	Annual Potential Emissions without regard to Control Device	CAM needed? If yes, submit a CAM Plan
EU1-Refiner Lines #2 and #3			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			<input type="checkbox"/> Yes <input type="checkbox"/> No
EU3-Boiler #9	SO ₂ , NO _x , PM, CO, HCl, Hg	SO ₂ : 0.6 tpy NO _x : 784 tpy PM: 127 tpy CO: 29 tpy HCl: 1513 lb/year Hg: 2.75 lb/year	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	SO ₂ : 0.002 tons/yr NO _x : 1.2 tons/yr PM: 0.5 tons/yr CO: 0.1 tons/yr HCl: not reported in AEI separately; total HAPs 0.6 lb/year Hg: 69 lb/yr		<input type="checkbox"/> Yes <input type="checkbox"/> No
EU4 – Boiler #10	SO ₂ , NO _x , Filterable PM, HCl, Hg,	SO ₂ : 0.6 tpy NO _x : 352 tpy PM: 75 tpy CO: 50 tpy HCl: 1513 lb/year Hg: 2.75 lb/year	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	SO ₂ : 0.002 tons/yr NO _x : 1.0 tons/yr PM: 0.2 tons/yr HCl: not reported separately in AEI; total HAPs 0.08 lb/year Hg: 9 lb/yr		<input type="checkbox"/> Yes <input type="checkbox"/> No
EU5 - Deinking			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			<input type="checkbox"/> Yes <input type="checkbox"/> No
EU6 – Paper Machines			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			<input type="checkbox"/> Yes <input type="checkbox"/> No

Emissions Unit	Pollutants (all)		Emissions		CAM Applicability	
			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Yes <input type="checkbox"/> No	
EU7 – Wastewater Treatment Plant			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			<input type="checkbox"/> Yes <input type="checkbox"/> No
EU8 – Cogeneration Facility Boiler	CO, NO _x , PM, Filterable PM, SO ₂ , VOC, Acrolein, NH ₃ , Benzene, Formaldehyde, HCl, Dioxin/Furan, Hg	CO: 644 tons/yr NO _x : 184 tons/yr PM: 37 tons/yr SO ₂ : 76 tons/yr VOC: 28 tons/yr Acrolein: 368 lb/yr NH ₃ : 25 ppmvd@7% Benzene: 2649 lb/yr Formaldehyde: 184 lb/yr HCl: 8094 lb/yr Dioxin/Furan: .0000059 lb/yr Hg: 2.94 lb/yr	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	CO: 64.3 tons/yr NO _x : 101 tons/yr PM: 8.4 tons/yr Filterable PM: 1 ton/yr SO ₂ : 6.7 tons/yr VOC: 1.4 tons/yr Acrolein: 15 lb/year NH ₃ : 3.3 tons/yr Benzene: 36 lb/yr Formaldehyde: 80 lb/yr HCl: 428 lb/year Dioxin/Furan: 0.0000001 lb/year Hg: 9 lb/yr		<input type="checkbox"/> Yes <input type="checkbox"/> No
EU9 – Cooling Towers	PM	PM: 0.24 tpy	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	PM: 0.02 tpy		<input type="checkbox"/> Yes <input type="checkbox"/> No
EU10 – Gasoline Dispensing*			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			<input type="checkbox"/> Yes <input type="checkbox"/> No
EU11 – Portable Temporary Generators**			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			<input type="checkbox"/> Yes <input type="checkbox"/> No
EU12 - Landfill*			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			<input type="checkbox"/> Yes <input type="checkbox"/> No

*PTE Not Determined, Plantwide Limit

** PTE Not Determined as ORCAA must be notified prior to use onsite.

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**AIR OPERATING PERMIT (AOP) RENEWAL APPLICATION
Form D: Applicability Determinations**

Facility Changes

Are/were there any...		If yes...
Notice of Construction Approval Orders that have been issued but not incorporated into the Air Operating Permit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Complete Form E for each Approval Order
Off-permit changes according to WAC 173-401-724?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Complete Form F
Section 502(b)(10) changes according to WAC 173-401-722(2)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Complete Form F
New sources or modifications that did not require a Notice of Construction?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Complete Form G

New Applicable Requirements

		If yes...
Are there any new applicable requirements?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Complete Form H
Are there any inapplicable requirements for which the source would like to request to extend the permit shield?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Does the accidental release prevention regulation apply to the facility? (40 CFR Part 68)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Attach a list of the regulated substances present in processes at the facility and identify the applicable program

Current Compliance

		If no...
Is the source in compliance with all of the conditions of the current permit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Attach a compliance plan.

Form D: Applicability Determinations, Page 2

Requested Changes

Are there any requested changes to...		If yes...
Testing conditions?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Complete Form I
Monitoring conditions (other than those being replaced by CAM)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Recordkeeping conditions?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Reporting conditions?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Non-applicable conditions?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Any conditions?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Other Changes/Corrections

Are there any...		If yes...
Changes to the Process Descriptions in the current Technical Support Document?*	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	*Please see attached process flow diagram that includes the addition of the OCC Tub Pulper
Changes to the Emission Unit Summary in the current Technical Support Document?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Changes to the Regulatory Determinations in the current Technical Support Document?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Changes to the Insignificant Emission Units listed in the current Technical Support Document?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Changes to the current Statement of Basis in the current Technical Support Document?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

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**AIR OPERATING PERMIT (AOP) RENEWAL APPLICATION
Form F: Off-Permit/502(b)(10) Changes**

Complete this form for each off-permit change per WAC 173-401-724 and each Section 502(b)(10) change per WAC 173-401-722(2).

Type of Change	Date notification submitted	Describe change	Integrate changes into the permit?	Explain
<input type="checkbox"/> Off-permit <input type="checkbox"/> 502(b)(10)			<input type="checkbox"/> Yes <input type="checkbox"/> No	
<input type="checkbox"/> Off-permit <input type="checkbox"/> 502(b)(10)			<input type="checkbox"/> Yes <input type="checkbox"/> No	
<input type="checkbox"/> Off-permit <input type="checkbox"/> 502(b)(10)			<input type="checkbox"/> Yes <input type="checkbox"/> No	
<input type="checkbox"/> Off-permit <input type="checkbox"/> 502(b)(10)			<input type="checkbox"/> Yes <input type="checkbox"/> No	
<input type="checkbox"/> Off-permit <input type="checkbox"/> 502(b)(10)			<input type="checkbox"/> Yes <input type="checkbox"/> No	

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**AIR OPERATING PERMIT (AOP) RENEWAL APPLICATION
Form G: NOC Not Required**

Complete this form for each unit which was constructed or modified without a Notice of Construction.

Date constructed or modified	Description of new unit or modification (including size, capacity, etc)	Citation for exemption per ORCAA Rule 6.1	Unit was identified in Table B of this application as a:	New applicable requirements
			<input type="checkbox"/> Significant EU <input type="checkbox"/> Insignificant EU	
			<input type="checkbox"/> Significant EU <input type="checkbox"/> Insignificant EU	
			<input type="checkbox"/> Significant EU <input type="checkbox"/> Insignificant EU	
			<input type="checkbox"/> Significant EU <input type="checkbox"/> Insignificant EU	

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AIR OPERATING PERMIT RENEWAL APPLICATIONS INSTRUCTIONS

NOTE: In some cases, a prior submittal to ORCAA (e.g., the annual emissions inventory) may include information requested below. If you would like to refer ORCAA to that information rather than provide the information here, please note this in your response. Any submittal to which ORCAA is referred will become part of your renewal application. It is also acceptable to attach relevant portions of your current Air Operating Permit if the information therein provides an adequate response to an information request in this application.

Duty to Correction Application: An applicant has the duty to supplement or correct an application. Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application must, upon becoming aware of such failure or incorrect submittal, promptly submit supplementary factors or corrected information. In addition, an applicant must provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a draft permit.

Form A: General Information

The purpose of Form A is to record general information for the facility and to obtain signatures from the Responsible Official verifying that the information provided is accurate and complete.

Responsible Official Certification: Renewal applications must be signed by a responsible official as defined in WAC 173-401-200:

- Corporations: President, secretary, treasurer or vice-president or other duly authorized person as allowed by WAC 173-401-200(29)(a);
- Partnership: General partner;
- Sole proprietorship: Proprietor;
- Public agency: Principal executive officer or ranking elected official.

In addition to submitting the application to ORCAA, a copy shall also be submitted directly to the USEPA. Such information will be treated in accordance with the provisions of 40 CFR Part 2.

Form B: Emissions Units

The purpose of Form B is to record information about your facility and its emission units.

Emissions Unit Number: This is a unique number that identifies the emission unit in question. For existing emission units, please refer to your current AOP for assigned emissions unit numbers.

Emissions Unit Name & Description: Provide the name and description of all emissions units at the facility.

Air Pollution Control Equipment: Please list any air pollution control equipment that exists for each emissions unit.

Fuel(s) Used: Please list all fuel(s) used for each emission unit, as applicable.

Significant or Insignificant: For each emission unit, please check if it is a significant (S) or insignificant (I) emission units as described and defined in WAC 173-401-530 through -533. For insignificant emissions units please state the basis for the determination (e.g., for a small propane storage tank, the basis would be WAC 173-401-533(2)(d)). Note that emissions units subject to a federally enforceable applicable requirement cannot be considered insignificant even if they are listed in WAC 173-401-530 through -533 (see WAC 173-401-530(2)(a)) (e.g., emergency generators subject to 40 CFR Part 63 Subpart ZZZZ would not be considered an insignificant emission unit.)

Form C: Emissions

The purpose of Form C is to record information about the amount of emissions emitted from your facility.

Emissions Unit Number: Please include each emission unit number from Form B for significant emission units. You do not need to include insignificant emission units on this form.

Pollutants: For each emission unit, include all regulated pollutants emitted including greenhouse gases. You will have more than one record for each emissions unit.

Emissions:

Annual Potential Emissions: Provide the potential annual emissions or "potential to emit" for each regulated pollutant. "Potential to emit" means the maximum capacity of a stationary source to emit air pollutants under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including restrictions on hours of operation or on the type or amount of materials combusted, stored, or processed, shall be treated as part of its design if the limitation is federally enforceable.

Emission rates or factors used in calculating annual potential emissions may be based on source test results, vendor guaranteed emission rates or concentrations, AP-42 emission factors, or other basis as approved by the Agency. All data, assumptions, and calculations used

in calculating potential emissions must be documented in the application. The following detailed instructions apply:

1. For emission rates based on source test information, please provide a one page summary including test results, the name of the testing firm, the test date, and reference to the methods used.
2. For emission estimates based on vendor guarantees, please provide a signed and dated copy of the guarantee from the vendor.
3. For calculated emission rates, please provide details of all assumptions, operational data, calculations, and other pertinent information used in calculating the annual emissions.
4. Additional applicability documentation, such as operational requirements, should be submitted in narrative form.

Actual Emissions for Calendar Year: Provide actual emissions of regulated pollutants for the most recent calendar year. Actual emissions should be expressed in terms of tons/year.

CAM Applicability:

The applicant should indicate whether or not an emissions unit is subject to the Compliance Assurance Monitoring (CAM) Rule (Title 40 Code of Federal Regulations Part 64). Units not subject to CAM will be subject to periodic monitoring.

The applicability determination for this rule starts with the question of what is the potential to emit for the unit if no control device were present? (40 CFR 64.2, Applicability, is copied below.) Please enter this amount for each pollutant into the fourth column. The last column is for indicating whether or not CAM is required for the unit. This determination needs to be made for each pollutant. It is probable that for a particular emissions unit, one pollutant would be subject to periodic monitoring and another pollutant would be subject to CAM. The applicability section of the CAM rule should be read carefully and be prepared to defend any determination you make.

§ 64.2 CAM Applicability.

- (a) *General applicability.* Except for backup utility units that are exempt under paragraph (b)(2) of this section, the requirements of this part shall apply to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria:
- (1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under paragraph (b)(1) of this section;
 - (2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and
 - (3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. For purposes of this paragraph, "potential pre-control device emissions" shall have the same meaning as "potential to emit," as defined in § 64.1, except that emission reductions achieved by the applicable control device shall not be taken into account.

(b) *Exemptions*—.

(1) *Exempt emission limitations or standards.* The requirements of this part shall not apply to any of the following emission limitations or standards:

- (i) Emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act.
- (ii) Stratospheric ozone protection requirements under title VI of the Act.
- (iii) Acid Rain Program requirements pursuant to sections 404, 405, 406, 407(a), 407(b), or 410 of the Act.
- (iv) Emission limitations or standards or other applicable requirements that apply solely under an emissions trading program approved or promulgated by the Administrator under the Act that allows for trading emissions within a source or between sources.
- (v) An emissions cap that meets the requirements specified in § 70.4(b)(12) or § 71.6(a)(13)(iii) of this chapter.
- (vi) Emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method, as defined in § 64.1. The exemption provided in this paragraph (b)(1)(vi) shall not apply if the applicable compliance method includes an assumed control device emission reduction factor that could be affected by the actual operation and maintenance of the control device (such as a surface coating line controlled by an incinerator for which continuous compliance is determined by calculating emissions on the basis of coating records and an assumed control device efficiency factor based on an initial performance test; in this example, this part would apply to the control device and capture system, but not to the remaining elements of the coating line, such as raw material usage).

(2) *Exemption for backup utility power emissions units.* The requirements of this part shall not apply to a utility unit, as defined in § 72.2 of this chapter, that is municipally-owned if the owner or operator provides documentation in a part 70 or 71 permit application that:

- (i) The utility unit is exempt from all monitoring requirements in part 75 (including the appendices thereto) of this chapter;
- (ii) The utility unit is operated for the sole purpose of providing electricity during periods of peak electrical demand or emergency situations and will be operated consistent with that purpose throughout the part 70 or 71 permit term. The owner or operator shall provide historical operating data and relevant contractual obligations to document that this criterion is satisfied; and
- (iii) The actual emissions from the utility unit, based on the average annual emissions over the last three calendar years of operation (or such shorter time period that is available for units with fewer than three years of operation) are less than 50 percent of the amount in tons per year required for a source to be classified as a major source and are expected to remain so.

Form D: Applicability Determinations

The purpose of Form D is to identify any changes or new applicable requirements to your facility and identify additional forms or information that needs to be submitted.

Facility Changes: Identify if there have been any changes to equipment or processes at the facility. If yes, please complete the identified form(s).

New Applicable Requirements: Identify if there have been any new applicable (or inapplicable) requirements (state, local, or federal) that have been promulgated since the last permit renewal. These requirements may include, but are not limited to, New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAPs).

Current Compliance: The applicant must determine the compliance status of each emission unit and each applicable requirement based on information and belief formed after reasonable inquiry including but not limited to comparing actual emissions with allowable limits. Requirements that a source is not complying with should be identified in the compliance plan. For those requirements, the applicant must include a schedule of measures to achieve compliance with the applicable requirement in the compliance plan required under WAC 173-401-510(2)(h).

Requested Changes: Please identify if you would like to request any changes to any conditions in the current permit and complete Form I.

Other Changes/Corrections: Please review the Technical Support Document and identify if there are any other changes that need to be made to the process descriptions, raw materials used, fuels used, etc. Please attach details or a marked up copy of the current permit.

Form E: NOC Approval Orders

Please complete this form if required by your answers to Form D. Please complete a separate Form E for each Approval Order that has been issued but not incorporated into your Air Operating Permit. List each new applicable requirement (including approval order requirements, NSPS, NESHAPs, etc) associated with the NOC and a brief description of the requirement.

Form F: Off-Permit/502(b)(10) Changes

Please complete this form if required by your answers to Form D. For each change that occurred during the current permit term state what type of change it was, the date a notification was submitted to ORCAA, a short description of the change, and whether or not the change needs to be incorporated into the renewal permit.

Form G: NOC Not Required

Please complete this form if required by your answers to Form D. For each unit that constructed or modified without a Notice of Construction state the date the unit was constructed or modified, a

description of the new unit or modification (including size, capacity, etc), the citation for exemption from NSR per ORCAA Rule 6.1, whether or not the unit is a significant or insignificant emission unit, and any new applicable requirements that apply.

Form H: New Requirements

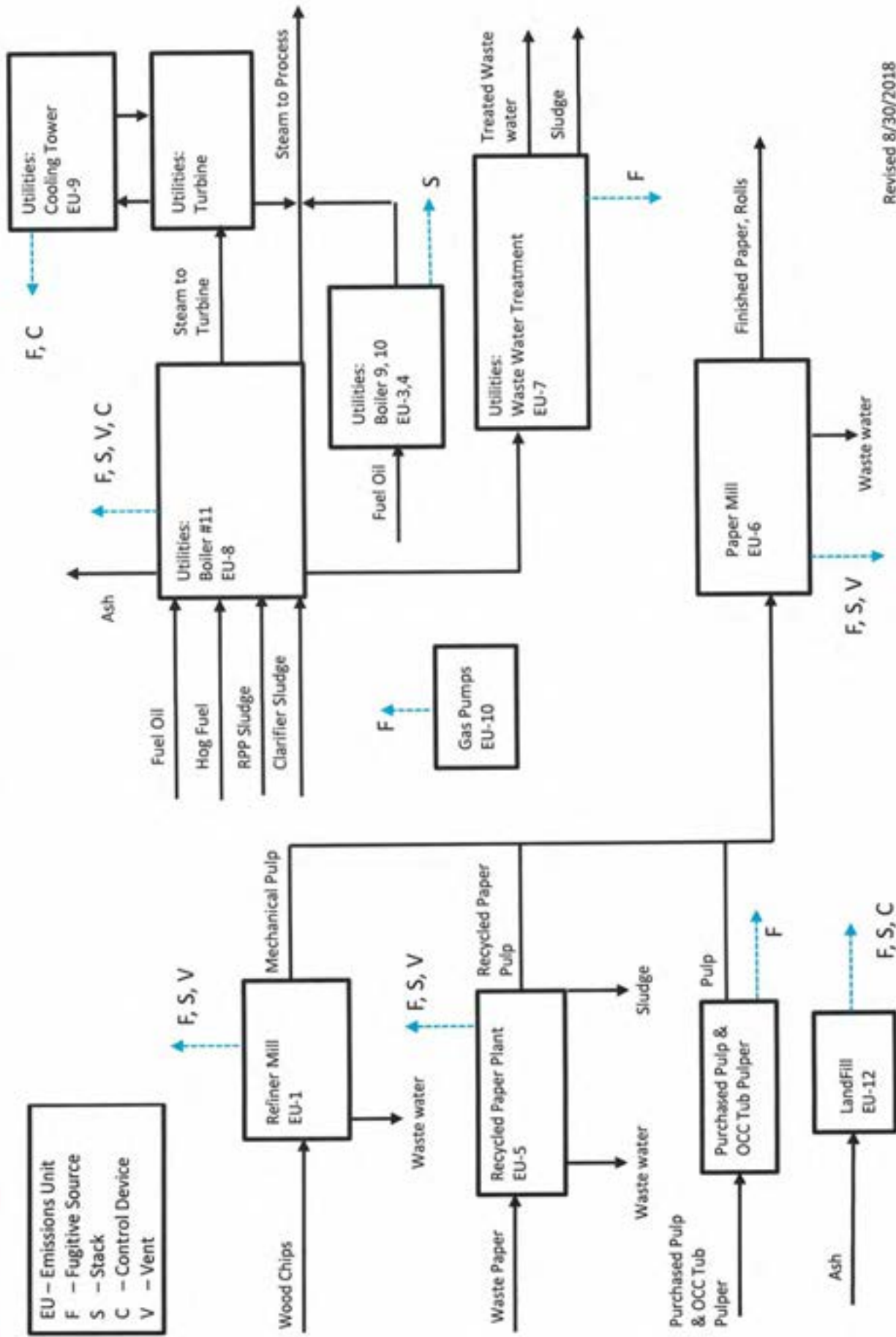
Please complete this form if required by your answers to Form D. For each new requirement that might apply to your facility, list the requirement, the emission unit it might apply to, and the applicability determination.

Form I: Requested Changes

Please complete this form if required by your answers to Form D. For each condition for which you would like to request a change to your current permit, please list the permit condition, requested change, and the reason for the change.



McKinley Paper Washington Mill Process Flow Diagram



Revised 8/30/2018