ORDER OF APPROVAL

NOTICE OF CONSTRUCTION 22NOC1581

ISSUED to McKinley Paper – Port Angeles Mill on
SEP 0 5 2023

This Order of Approval ("Order") is issued in accordance with Olympic Region Clean Air Agency ("ORCAA") Rule 6.1(a)(3) and Washington Administrative Code 173-400-114.

Conditional approval to install a powdered activated carbon injection system to control mercury emissions from the biomass boiler located at 1815 Marine Drive, Port Angeles, in Port Angeles ("Approved Location"), for operation solely as described in the associated Notice of Construction ("NOC") application 22NOC1581, is hereby GRANTED to McKinley Paper ("Applicant"), subject to the Conditions of Approval listed below.

This Order and the Conditions of Approval herein remain in effect for the life of the Approved Equipment as used at the Approved Location and shall be binding on Applicant, current owners and operators of the equipment, and Applicant's heirs, successors and assigns unless amended or superseded by a subsequent Order issued by ORCAA or unless the equipment is permanently shut down. The Applicant must notify any subsequent owner, operator, heirs, successor or assigns of this Order and the Conditions of Approval herein.

Conditions of Approval established in this Order shall be enforceable in addition to any applicable state, local, and federal regulations, or standards in existence now or in the future. Compliance with the conditions of this Order do not relieve the Applicant or any owner or operator from compliance with ORCAA Regulations, chapter 70A.15 of the Revised Code of Washington, or any other emissions control requirements, nor from any penalties for failure to comply with the same. Applicant may appeal this Order to the Pollution Control Hearings Board ("PCHB") by filing a written appeal with the PCHB and serving a copy upon ORCAA within thirty (30) days of receipt of this Order.

This Order is GRANTED, subject to the following Conditions of Approval:

1. **Approved Equipment.** The proposed Powdered Activated Carbon injection system (PAC system) as described in Notice of Construction application No. 22NOC1581 and the associated Final Determination, is approved subject to conditions in this Order of Approval.

[Regulatory Basis: ORCAA 6.1.2(l); WAC 173-400-114(1)]]

2. **PAC System Operation and Maintenance:**
   a) The PAC injection system must meet all requirements for operating and maintaining activated carbon injection systems per 40 CFR Part 63, Subpart DDDDD (the Boiler MACT).
   b) The ESP and Condensing Economizer must be operating and fully functional whenever the PAC system is operating.
   c) The PAC unit must be started as soon as possible after startup of Boiler #11.
   d) The PAC system hopper must be large enough to facilitate a PAC bulk bag change without interrupting PAC injection.

[Regulatory Basis: 40 CFR Part 63, Subpart DDDDD; ORCAA Rule 6.1.10(b)(2); WAC 173-400-114(2)(b)]

3. **Monitoring.** The PAC system must be monitored according to applicable requirements for activated carbon injection systems per the Boiler MACT as follows:
   a) The PAC injection rate must be monitored in terms of pounds per hour. Monitoring must be sufficient to determine the 30-day rolling average carbon injection rate whenever Boiler #11 is burning solid fuel and is not in startup or shutdown mode.
   b) During performance stack testing for mercury, the PAC injection rate must be monitored and recorded at 15-minute intervals or more frequently during test runs.
   c) The sludge combustion rate must be controlled to not exceed 600 gallons per minute, daily average.
   d) The mercury concentration and calorific content of both the composite fuel and of the sludge combusted must be determined in conjunction with any source testing for mercury. For purposes of meeting this condition, samples of the composite hog fuel and of the sludge must be taken concurrently or within an hour of each other.
   e) The Permittee must also conduct fuel analyses according to §63.7521 and establish maximum fuel mercury input levels according to paragraphs (b)(1) through (3) of §63.7530, as applicable, and as specified in §63.7510(a)(2). [Regulatory Basis: §63.7530 (b)]

[Regulatory Basis: 40 CFR Part 63, Subpart DDDDD; ORCAA Rule 6.1.10(b)(2); WAC 173-400-114(2)(b)]

4. **Mercury Standard Compliance Assurance.** The Permittee must demonstrate continuous compliance with the mercury standard per 40 CFR Part 63, Subpart DDDDD (the Boiler MACT) as follows:
   a) Conduct performance testing according to §63.7520 on an annual basis, except as specified in paragraphs (b) through (e), (g), and (h) of §63.7515. [Regulatory Basis: §63.7515(a)]
   b) Performance testing for mercury must be conducted at representative operating load conditions while burning the type of fuel or mixture of fuels that has the highest content of mercury. [Regulatory Basis: §63.7520 (c); §63.7515 (b)]
   c) Except during startup and shutdown, maintain the 30-day rolling average carbon injection rate at or above the minimum carbon injection rate whenever Boiler #11 combusts solid fuels. Minimum activated carbon injection rate means load fraction multiplied by the lowest hourly average activated carbon injection rate measured during the most recent

performance test demonstrating compliance with the mercury emission standard. [Regulatory Basis: Tables 4 and 8 to Subpart DDDDD of Part 63]

d) Operating below the established minimum carbon injection rate limit constitutes a deviation of the requirement in paragraph (d) of this condition except during performance tests conducted to determine compliance with the mercury emission limit or to establish new operating limits. Operating limits must be confirmed or reestablished during performance tests. [Regulatory Basis: §63.7540(a)(1)]

e) Establish the site-specific minimum carbon injection rate operating limit according to §63.7530(b) using data from the activated carbon rate monitor and mercury performance test as follows:
   i) Collect activated carbon injection rate data every 15 minutes during the entire period of the performance tests;
   ii) Determine the hourly average activated carbon injection rate by computing the hourly averages using all of the 15-minute readings taken during each performance test;
   iii) Determine the lowest hourly average carbon injection rate established during the performance tests as the operating limit. When Boiler #11 operates at lower loads, multiply the activated carbon injection rate by the load fraction, as defined in §63.7575, to determine the required injection rate. [Regulatory Basis: Table 7 to Subpart DDDDD of Part 63]

f) Prior to burning a new type of fuel or a new mixture of fuels, the Permittee must recalculate the maximum mercury input using Equation 8 of §63.7530. If the results of recalculating the maximum mercury input are higher than the maximum mercury input level established during the previous stack performance test for mercury, then the Permittee must conduct a new performance test within 60 days of burning the new fuel type or fuel mixture according to the procedures in §63.7520 to demonstrate that the mercury emissions do not exceed the emission limit and to establish new operating limits. [Regulatory Basis: §63.7530 (b) and §63.7540(a)(6)]

[Regulatory Basis: 40 CFR Part 63, Subpart DDDDD; ORCAA Rule 6.1.10(b)(2); WAC 173-400-114(2)(b)]

5. **Record Keeping.** The following records must be maintained according to the Permittee's current, effective Air Operating Permit:
   a) Date and time the PAC unit is started and shutdown.
   b) PAC injection rates recorded at 15-minute intervals during performance stack testing for mercury must be included in performance stack testing reports for mercury.
   c) The minimum carbon injection rate limit determined during the most recent performance test demonstrating compliance with the mercury standard.
   d) 30-day rolling average carbon injection rates for all hours Boiler #11 was burning solid fuel and was not in startup or shutdown mode.
   e) Dates, times, and durations when the carbon injection rate was below the minimum carbon injection rate limit.

[Regulatory Basis: 40 CFR Part 63, Subpart DDDDD; ORCAA Rule 6.1.10(b)(2); WAC 173-400-114(2)(b)]

6. **Reporting**. According to the Permittee's current, effective Air Operating Permit. [Regulatory Basis: ORCAA Rule 6.1.10(b)(2); WAC 173-400-114(2)(b)]

Mark V Goodin 9/1/2023

PREPARED BY: Mark V. Goodin, Date: September 1, 2023

Mark V Goodin 9/1/2023

REVIEWED BY: Mark V. Goodin, PE Date: September 1, 2023

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FINAL DETERMINATION to APPROVE:

PAC Injection System

McKinley Paper

22NOC1581

September 1, 2023

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NOTICE OF CONSTRUCTION
FINAL DETERMINATION TO APPROVE

Olympic Region Clean Air Agency

Issued to:	**McKinley Paper**	**County:**	**9-Clallam**
Location:	**1815 Marine Drive** **Port Angeles**	**Source:** **RC:**	**7** **AOP**
Application #:	**22NOC1581**	**File:**	**153**
Prepared on:	**September 1, 2023 - Final**		

1. Summary

McKinley Paper Company (McKinley) seeks approval from Olympic Region Clean Air Agency (ORCAA) to install a powdered activated carbon injection system (PAC system) to control mercury emissions from a biomass-fired boiler at their integrated recycle pulp and paper mill located in Port Angeles, Washington. PAC systems are regulated as air pollution control devices and are required to be approved by the local air pollution control authority (ORCAA) prior to being installed. The PAC system proposed by McKinley is necessary to control mercury emissions to levels that maintain compliance with the mercury standard required by the federal emissions standards for new biomass-fired boilers (40 CFR Part 63, Subpart DDDDD; AKA the Boiler MACT). ORCAA staff reviewed McKinley's proposed PAC system and concluded it will reduce mercury emissions to levels that meet federal standards and will not increase emissions of other air pollutants. Based on these determinations, ORCAA staff recommends conditional approval.

The conditions of approval recommended by staff are necessary to assure the PAC system will be operated in a manner that assures compliance with mercury standards. Staff's recommended conditions of approval also require appropriate monitoring, recordkeeping, and reporting that meet requirements for major sources under Washington's Air Operating Permit (AOP) program (Chapter 173-401 WAC), to which McKinley is subject. Staff's recommended conditions of approval are detailed in Section 12 of this Final Determination report.

2. Regulatory Background

ORCAA's Rule 6.1(a)(3) and Washington Administrative Code 173-400-114 (WAC 173-400-114) both require review and approval through a Notice of Construction (NOC) application prior to replacing or substantially altering air pollution control technology, provided that projects qualifying as routine maintenance, repair, or similar parts replacement are exempt. Both rules are pursuant to the Washington Clean Air Act under 70A.15.2220 of the Revised Code of Washington.

Projects involving only routine maintenance, repair or similar parts replacement are exempt from review, provided the same level of air pollution control is achieved. Applicability of this exemption is determined on a case-by-case basis and may involve comparing the cost of the project with respect to the original cost of the control technology. Installing additional air pollution control devices, completely replacing an air pollution control device, or rebuilding the majority of critical parts of an air pollution control device, do not qualify as routine maintenance, repair, or similar parts replacement.

Per Rule 6.1.10, only projects that do not increase air pollution qualify for review under Rule 6.1(a)(3) and WAC 173-400-114. Projects that increases air pollution are considered either "New Sources" or "Modifications," and are subject to New Source Review (NSR) and distinct criteria for approval, even if only involving air pollution control technology. Therefore, projects involving replacement or substantial alteration of air pollution control technology are subject to the requirements for approval under ORCAA's Rule 6.1.10 and WAC 173-400-114, provided:

1. They do not qualify as routine maintenance or repair; and,
2. Air pollutant emissions will not increase.

The requirements for review and approval under ORCAA's Rule 6.1.10 and WAC 173-400-114 provide that ORCAA may:

1. Require the owner or operator employ "Reasonably Available Control Technology" RACT on the affected stationary source (on the emissions unit served by the subject control technology);
2. Prescribe reasonable operation and maintenance conditions for the control equipment; and,
3. Prescribe other requirements as authorized by chapter 70A.15 RCW.

In this case, McKinley is proposing to install a new PAC system that will serve as the mercury control device for McKinley's Boiler #11. Because the proposal is to add a new pollution control device, the action does not qualify as routine maintenance, repair, or similar parts replacement. As explained below, ORCAA staff determined that the PAC system will reduce mercury emissions and will not increase the rate of other air pollutants emitted by Boiler #11. Based on these determinations, ORCAA staff's conclusion is that the project does not trigger review as a "New Source" or "Modification." Therefore, review and approval of the project under ORCAA Rule 6.1.10 and WAC 173-400-114 is required.

Review and approval is initiated by the project proponent submitting an NOC application[1]. The NOC application provides ORCAA information on the proposed project of sufficient detail to determine emissions implications of the new control device, compliance with applicable air requirements, acceptable operating levels, and appropriate monitoring, recordkeeping, and reporting. The NOC application also helps staff determine how to apply the provisions under

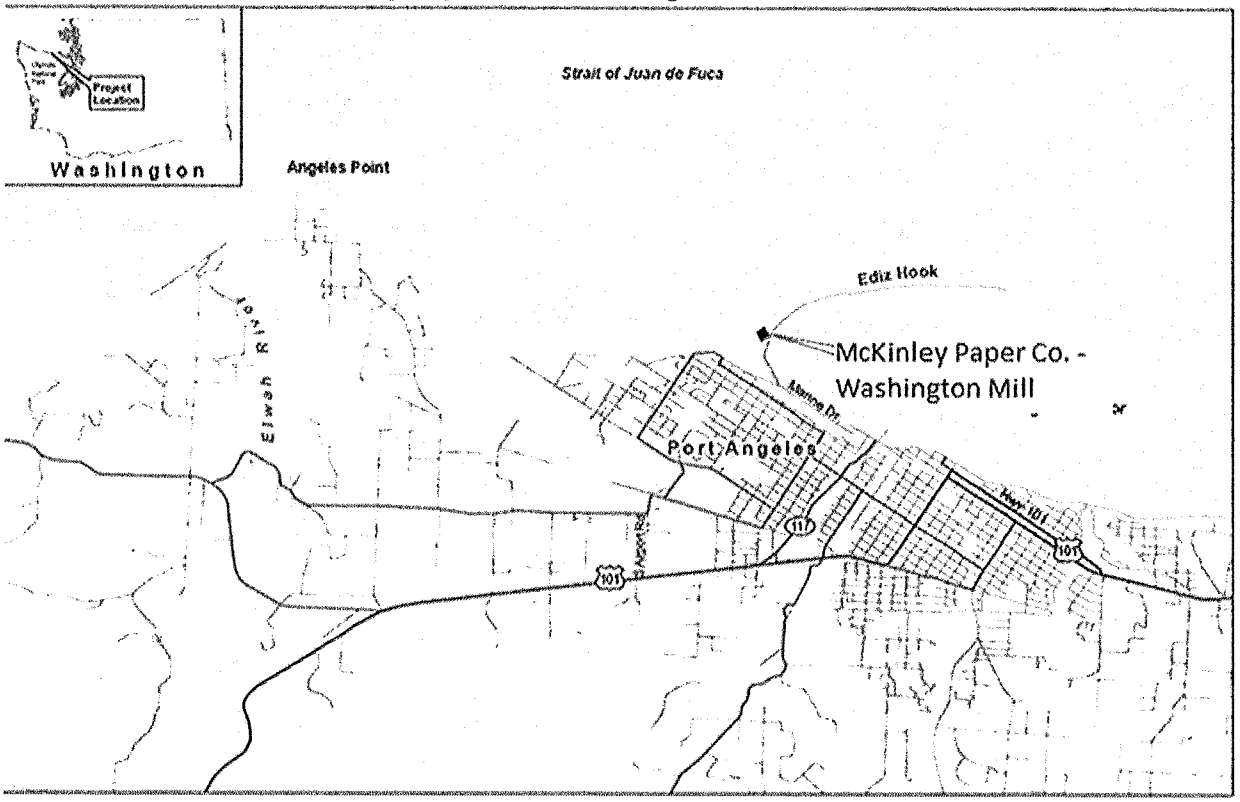
[1] There are two categories of NOC applications: Notice of Construction (NOC) and Notice of Construction Revision (NOR). NOCs are required for new or modified sources, new control technology, replacing an existing stationary source or control technology, and substantially altering control technology. NORs are required when an owner or operator requests a revision to an existing air permit issued by ORCAA.

ORCAA Rule 6.1.10 and WAC 173-400-114. NOC applications are posted on ORCAA's website and may undergo a public notice and comment period if requested by the public.

3. Facility Background

The McKinley Facility in Port Angeles is an integrated pulp and paper mill that produces packaging grade brown paper and containerboard from recycled feedstock. It was purchased by the McKinley Paper Co. in 2017 from Nippon Paper Industries USA Co., Ltd. It is located at the base of Ediz Hook, which is zoned "Industrial Heavy" and is on the western edge of Port Angeles Harbor, as shown in Figure 1. The mill was originally constructed in 1920 and has operated as a pulp and paper facility to the present. Table 1 summarizes the history of ORCAA permitting actions for the facility.

Figure 1. Location of McKinley Paper Co. – Washington Mill



* Imagery ©2018 Google, Maps data ©2018 Google
** Annotated by ORCAA

Table 1. 20-Year Summary of Air Permit Actions

Permit # (date approved)	Description	Status of NOC Approval Order
03NOC305 (7/31/2003)	1. Replaced existing mechanical fuel stoker system with a pneumatic system. 2. Replaced and reconfigured existing over-fire air system. 3. Replaced 56% of the steam generating bank tubes.	**Not Applicable** - Boiler #8 has been decommissioned and is no longer operable

03NOC318 (8/14/2003)	Closure of Phase II cell of Lawson Landfill including Installation of a passive landfill gas venting system.	**Effective** - Landfill is still being used to dispose of boiler ash. It is designated as EU12 in McKinley's AOP.
03NOC325 (9/24/2003)	Revised the Boiler #8 particulate matter emissions "cap" in condition #2 in the Approval Order for 03NOC305.	**Not Applicable** - Boiler #8 has been decommissioned and is no longer operable
08NOC645 (not approved)	Nippon, the facility owner at that time, requested approval to combust recycled paper plant rejects in Boiler #8. The request was not approved, and the NOC application was rescinded in 2010.	**Not Applicable** - NOC application was not approved and was rescinded.
10NOC763 (6/21/2011)	Approved construction of a new 420 MMBtu/hr biomass-fueled boiler in a combined heat and power configuration.	**Superseded** - by 15MOD1125
12NOC885 (4/26/2012)	Approved construction of above ground gasoline dispensing facility.	**Effective** – Gasoline dispensing facility is designated as EU10 in McKinley's AOP.
12NOC889 (3/11/2013)	Approved construction of 5,500 gpm cooling tower to serve the condensing steam turbine.	**Not Applicable** – The condensing steam turbine was replaced with a "back pressure" steam turbine, which does not require a cooling tower. Cooling towers have been abandoned in place.
13MOD989 (8/15/2013)	Approved revision condition 14 of the Approval Order 10NOC763 in order to reflect the current, effective National Emission Standards for Hazardous Air Pollutants (NESHAP) for boilers, 40 CFR 63 Subpart DDDDD (Boiler MACT).	**Superseded** - by 13MOD998
13MOD998 (12/22/2014)	Approved revisions to conditions 15, 18, 22, and 26 in Approval Order for 10NOC763. Changes were needed to reflect the current PM monitoring requirements in the effective Boiler MACT.	**Superseded** - by 15MOD1125
15MOD1125 (2/12/2016)	Approved revisions to condition 10 (NOx limit) and added condition 43 to 13MOD998.	**Superseded** - by 21NOR1125
15MOD1131 (2/11/2016)	Approved voluntary limits on boilers #9 and #10 so they can be classified as "Limited-Use" boilers under the Boiler MACT.	**Effective** – Boilers #9 & #10 are designated as EU3 & EU4 in McKinley's AOP. Both boilers operate as limited use boilers.
15NOC1115 (8/19/2015)	Approved recycled (old), corrugated cardboard (OCC) pulping system to mill.	**Not Applicable** – The entire pulping plant including the OCC was reconstructed in 2019. The new integrated pulping plant is subject to 19NOC1327.
19NOC1327 (8/27/2019)	Approved reconstruction of entire pulp plant at McKinley.	**Effective** – The Approval Order for 19NOC1327 establishes limits and requirements for McKinley's pulping operations.
21NOR1544 (1/25/2022)	Approved revisions to SO2 monitoring conditions in 15MOD1125.	**Effective** – This is the effective Approval Order for McKinley's biomass boiler (Boiler #11). It supersedes 15MOD1125.

4. Facility Description

The McKinley facility includes a recycle pulp plant, two paper machines, a wastewater treatment plant, landfill (off-site), a biomass-fueled boiler in a combined heat and power configuration, two backup fuel oil fired boilers that are operated as limited use boilers, and an emergency generator. The pulp plant is a single-line continuous recycle pulper with a design capacity of 900 oven-dry tons of pulp per day. The two paper machines are currently permitted at a combined production capacity of 840 air-dried tons per day (ADT/day). The biomass-fired boiler (Boiler #11) burns primarily wood-derived fuel but is also approved to co-combust a small percentage of dewatered sludge from McKinley's wastewater treatment plant, clean woody biomass from construction debris, demolition debris and other post-consumer wood waste. Boiler #11 became fully operational by the end of 2014.

The McKinley Facility is a major source of both criteria air pollutants and Hazardous Air Pollutants (HAP). Therefore, it is subject to Title V of the federal Clean Air Act and required to operate under an AOP. Existing air emissions units at the facility are listed and described in Table 2.

Table 2. Existing Emissions Units

Emission Unit ID#	Description	Air Pollution Control Technology	Effective NOCs
EU1	#2 and #3 Refiner Lines: Decommissioned August 27, 2019	N/A	N/A
EU2	Boiler 8: Decommissioned January 2016	N/A	N/A
EU3 & EU4	▪ Limited use boiler per 40 CFR §63.7575 ▪ Babcock and Wilcox type FM water tube boiler ▪ Rated at 157 MMBtu/hr (100,000 lbs/hr) ▪ Fuel: #6 fuel oil, #2 fuel oil ▪ Max pressure: 300 psig ▪ Working pressure: 225 psig ▪ Constructed in 1981	No mechanical devices, sulfur dioxide limits met by limiting sulfur content in oil burned	81NOC326 15MOD1131
EU5	Recycle Pulp Plant: ▪ Single-line continuous pulper capable of processing a variety of fiber feedstock. ▪ 900 ODTP/day (1,000 ADTP/day) permitted capacity. ▪ 328,500 ODTP/year (365,000 ADTP/year) permitted capacity. ▪ No chemical bleaching of pulp ▪ Fugitive source of Volatile Organic Compounds (VOC) including Toxic Air Pollutants (TAP) and Hazardous Air Pollutants (HAP) ▪ Re-constructed in 2019	No add on control technology	19NOC1327
EU6	Paper Machines (1&2): ▪ Two paper machines ▪ Fugitive source of Volatile Organic Compounds (VOC) including Toxic Air Pollutants (TAP) and Hazardous Air Pollutants (HAP)	No add-on control technology	19NOC1327

	▪ Gross combined production capacity of the paper machines does not exceed 840 air-dried tons per day. ▪ Paper machines #1 was reconstructed in 2019		
EU7	Wastewater Treatment Plant: ▪ Fugitive source of Volatile Organic Compounds (VOC) including Toxic Air Pollutants (TAP) and Hazardous Air Pollutants (HAP) and methanol	None	None – NSR never triggered
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 psi_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	21NOR1544
EU9	2-Cell Cogen Cooling Tower – Abandoned in place.	N/A	N/A
EU10	Gasoline Dispensing: ▪ 300 gallon above ground gasoline storage tank ▪ Not equipped with vapor recovery	None	12NOC885
EU11	Portable Temporary Generators: ▪ 40 CFR Part 89 compliant ▪ Temporary (< 12-months)	None	N/A
EU12	Landfill: ▪ 7-acre landfill ▪ Used to landfill boiler ash	Passive, landfill gas collection system	03NOC318

5. Project Description

The PAC system proposed by McKinley is needed to reduce mercury emissions from Boiler #11 to levels below the applicable federal mercury emissions standard for new biomass boilers, which is a standard from the Boiler MACT. Boiler #11 was tested in April of 2021 and found to emit over the federal mercury standard: The average mercury rate measured over three, 1-hour test runs was 8.4×10^{-7} lbs/MMBtu. The Boiler MACT standard that applies to Boiler #11 is 8.0×10^{-7} lbs/MMBtu. Later testing in November 2022 was conducted using a trial PAC system. Results confirmed that operation of the PAC system at an injection rate of 10 pounds per hour, controlled mercury emissions below the applicable mercury standard. Comparative results are shown in Table 3.

Table 3. Mercury Emissions Comparison

	lb/MMBtu	lb/hr	lb/day	lb/yr
April 2021 Test (uncontrolled)	8.40E-07	3.53E-04	8.47E-03	3.09
PAC Testing (controlled by PAC)	2.63E-07	1.10E-04	2.65E-03	0.97

Boiler MACT Standard	8.0E-07	N/A	N/A	N/A
Reductions Attributed to Trial PAC	5.77E-07	2.42E-04	5.82E-03	2.12

* Mass rates all based on 420 MMBTU/hr maximum heat input.

PAC systems are classified as "dry sorbent injection" control systems. Sorbents are substances that have the ability to capture certain gases and liquids on a molecular level through "adsorption," which is a chemical process whereby a solid material holds molecules of a gas, liquid, or solute as a thin film. This occurs when a substance is caught either in nanopores or adheres to the surface of the sorbent by low energy forces referred to as Van der Waal Forces. Adsorption is similar to absorption except that it occurs on a nano-metric scale ($1X10^{-9}$ meters) and can capture individual molecules of substances.

PAC is an effective adsorbent for mercury and other Hazardous Air Pollutants (HAP) like dioxins and furans. A side benefit is that the PAC system may also control dioxin and furan emissions from Boiler #11. Although Boiler #11 has been tested and found to meet applicable limits for dioxins and furans, additional emissions reductions are a benefit because these pollutants are persistent (long lived) and bioaccumulate in the fatty tissues of both aquatic and terrestrial organisms.

Dry sorbent injection systems are tried and proven as an effective control technology for mercury. The process involves first capturing pollutants in the flue gas stream using a sorbent particulate material, in this case, powdered activated carbon (PAC). PAC injection is followed by removing the particulate using a particulate control device. The particulate control device for Boiler #11 is a four-zone, electrostatic precipitator (ESP) with an overall particulate control efficiency of 99.3 percent. The ESP was constructed at the same time as Boiler #11. The particulate captured in the ESP is collected and landfilled. Therefore, the ultimate fate of the mercury captured by the proposed PAC system is McKinley's existing landfill, which has been in use by the facility since its inception to dispose of boiler ash from the facility. ORCAA staff estimate that the amount of mercury captured and landfilled by the new PAC system will be between 1.0 and 2.1 pounds per year.

The PAC system will be purchased from the ANDRITZ Group (Andritz), which is a multinational corporation that designs and manufactures specialized industrial equipment for many different industries including the pulp and paper industry. Until the PAC system is installed and operational, McKinley is operating a temporary rental PAC system to assure compliance with the Boiler #11 mercury standard. The permanent PAC system will be sized to supply PAC injection rates from 5 to 50 pounds per hour, which was the range of PAC feed rates tested by McKinley with the temporary rental PAC system operating.

PAC is injected via lances already installed into exiting ports on the Boiler #11 exhaust duct between the multiclone and the ESP. PAC will be gravity fed from a bulk bag into the PAC system hopper, which will meter PAC to the injection blower via auger. Each bulk bag will supply approximately 3 days of PAC at 10 pounds per hour. The bulk bag changeout procedure takes approximately 30 minutes to complete. However, the PAC system hopper itself provides

approximately 3 hours of operation. Therefore, PAC injection should be continuous, provided PAC levels are monitored and bulk bags are replaced as soon as they are emptied.

PAC system operating variables such as hopper level, injection pressure, blower flowrate, inlet temperature to the ESP, and the PAC injection rate will be monitored to assure optimal operation of the PAC system. New monitoring systems associated with the PAC injection system will be wired into the Mill's exiting data control system and monitored from the Boiler #11 control room.

6. Emissions Evaluation

As stated previously, mercury emissions rates are expected to substantially decrease and there is a potential for decreases in dioxin and furan emissions as well. Addition of the PAC system will not cause any increase in the heat rate to Boiler #11. Therefore, the rates of gaseous air pollutants from combustion of biomass fuel are expected to remain the same. Although PAC injection will increase particulate load into the ESP by approximately 10 pounds per hour, McKinley asserts that this increase will be captured in the ESP.

The ESP was designed to remove upwards of 99.3% of the total particulate in the exhaust stream. In addition, the ESP is followed by another control device called a Condensing Economizer (CE), which is a two-stage unit consisting of indirect and direct contact heat exchangers. CEs recover heat from boiler flue gas to increase efficiency and can also reduce emissions of particulates and acid gases emissions like Hydrogen Chloride. CEs reduce particulate emissions primarily by inertial impaction of particles on tube surfaces and water droplets. Collected particles are then removed with the CE condensate. The flue gas then flows to the direct contact scrubbing vessel for further air pollution control. Most of the water in these units are on recirculation loops to recover heating value; an overflow tank discharges to the process sewer. Past testing by the Brookhaven National Laboratory demonstrated control efficiencies of CEs as high as 91% and 98% for controlling PM_5 (particulate at 5 μm) and larger particles from oil fired and coal fired industrial boilers, respectively.[2] The PAC used by McKinley is between 10 and 100 μm in diameter according to the Safety Data Sheet from the PAC manufacturer. Therefore, McKinley's CE will likely achieve comparable control.

Considering the high degree of particulate control by the ESP and a conservative estimate of 90% control of particulate by the CE, the overall PAC removal efficiency is estimated by ORCAA staff at upwards of 99.9%. Based on this assessment, ORCAA staff agree with McKinley's assertion that particulate emission rates will not increase as a result of the PAC system. Particulate emissions testing is required annually under the Boiler MACT and will verify this outcome. The next scheduled particulate test is planned for the spring of 2023.

7. Administrative Requirements for NOC Applications

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[2] Butcher, T.A.; Litzke, W.L.; Schulze, K. & Bailey, R. Condensing economizers for efficiency improvement and emissions control in industrial boilers, article, June 1, 1996; Upton, New York.

All NOC applications are subject to filing fees according to ORCAA Rule 3.3(b) and may incur additional NOC processing fees at an hourly rate according to ORCAA Rule 3.3(c). Applicable NOC filing fees for McKinley's NOC application were paid prior to ORCAA commencing processing of the application. Additional NOC processing fees may apply and will be determined and assessed prior to issuing a Final Determination and the Approval Order (a.k.a. Air Permit).

NOC applications are subject to a 15-day public notice and an opportunity to request a 30-day public comment period and opportunity for a public hearing. Public notice of McKinley's NOC application was posted on ORCAA's website on December 19, 2022. The time period for filing comments on the application and requests for a public comment period expired on January 3, 2023. No comments on the NOC application or requests for a public comment period or hearing were received during the NOC application noticing period. Based on this result, neither a public comment period nor public hearing were initiated by ORCAA.

8. SEPA Review

The State Environmental Policy Act (SEPA) under Chapter 197-11 WAC was intended to provide information to agencies, applicants, and the public to encourage the development of environmentally sound proposals. The goal of SEPA is to assure that significant impacts are mitigated.

The City of Port Angeles (City) is serving as the Lead Agency for this project. In addition to a SEPA Checklist, the City requested a Shoreline Substantial Development Permit application and a Joint Aquatic Resource Permit Application (JARPA) form for the PAC system installation. McKinley submitted the application package to the City on January 9, 2023. The City issued a Mitigated Determination of Non-Significance (MDNS) for McKinley's PAC system project on March 4, 2023.

9. Provisions for Approval

For projects triggering review and approval solely as replacements or substantial alterations of air pollution control technology, RCW 70A.15.2220 provides ORCAA authority to:

a) Require the owner or operator employ "Reasonably Available Control Technology" (RACT) on the affected stationary source (on the emissions unit served by the subject control technology); and,
b) Prescribe reasonable operation and maintenance conditions for the control equipment.
c) Prescribe other requirements as authorized by Chapter 70A.15 RCW.

In this case, ORCAA considers adding a PAC system as adding a new air pollution control unit, which constitutes a substantial alteration of the existing air pollution control technology on Boiler #11. ORCAA staff concluded that mercury emissions will decrease with operation of the PAC system and that emissions rates of other pollutants will remain the same or decrease. Therefore, the requirement to secure ORCAA's approval through a NOC application is triggered by the substantial alteration in air pollution control technology alone and the three provisions stated above apply. These provisions are required under ORCAA's Rule 6.1.10 and WAC 173-

400-114. The following sections provide more detail on each of the above three stated provisions.

Reasonably Available Control Technology (RACT):

RACT is defined in ORCAA's Rule 1.4 as:
The lowest emission limit that a particular stationary source or stationary source category is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility. RACT is determined on a case-by-case basis for an individual stationary source or stationary source category taking into account the impact of the stationary source upon air quality, the availability of additional controls, the emission reduction to be achieved by additional controls, the impact of additional controls on air quality, and the capital and operating costs of the additional controls. RACT requirements for any stationary source or stationary source category shall be adopted only after notice and opportunity for comment are afforded.

ORCAA staff could not find any existing biomass fired boilers utilizing PAC injection for controlling mercury emissions. In addition, ORCAA staff could not locate any existing biomass fired boilers that are subject to the "New Boiler" standards from the Boiler MACT. Most if not all of existing biomass fired boilers are subject to the "Existing Boiler" standards from the Boiler MACT, which are over an order of magnitude greater (less stringent) compared to the "New Boiler" standards. As stated previously, the mercury standard for New Boilers, which is the standard McKinley's Boiler #11 is subject to, is 8.0×10^{-7} lbs per million Btu of heat input (8.0E-7 lbs/MMBtu). The "Existing Boiler" standard is 5.4E-06 lb/MMBtu. Based on stack testing results from other biomass boilers in ORCAA's jurisdiction and elsewhere in Washington, existing biomass boilers can comfortably meet the "Existing Boiler" mercury standard using only particulate control devices like ESPs and baghouses. However, meeting the "New Boiler" standard is much more difficult, even for strictly hog fuel fired boilers.

McKinley evaluated several options for controlling mercury including adjusting combustion conditions, reducing fuel moisture, and reducing dewatered sludge combustion. Operation of the PAC system proved the most effective and reliable at maintaining mercury emissions in compliance with the mercury standard. Based on this, ORCAA staff's conclusion is that the PAC system proposed by McKinley meets the RACT requirement for this case.

Reasonable Operation and Maintenance Conditions:

McKinley proposed to monitor hopper level, injection pressure, and the PAC injection rate of the PAC system, however, more is needed to meet requirements under 40 CFR Part 63, Subpart DDDDD—National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (Boiler MACT). The Boiler MACT sets the minimum requirements for monitoring the new PAC system and demonstrating compliance. The following requirements from the Boiler MACT were determined applicable:

- You must conduct all applicable performance tests according to §63.7520 on an annual basis, except as specified in paragraphs (b) through (e), (g), and (h) of this section. [Regulatory Basis: §63.7515(a)]

- The requirement to test at maximum mercury input level is waived unless the stack test is conducted for mercury. [Regulatory Basis §63.7515 (b)]
- You must conduct performance tests at representative operating load conditions while burning the type of fuel or mixture of fuels that has the highest content of chlorine and mercury and you must demonstrate initial compliance and establish your operating limits based on these performance tests. [Regulatory Basis: §63.7520 (c)]
- Following each performance test and until the next performance test, you must comply with the operating limit for operating load conditions specified in Table 4 to this subpart. [Regulatory Basis: §63.7520 (c)]
- If you demonstrate compliance through performance stack testing, you must establish each site-specific operating limit in Table 4 to this subpart that applies to you according to the requirements in §63.7520, Table 7 to this subpart, and paragraph (b)(4) of this section, as applicable. [Regulatory Basis: §63.7530 (b)]
- You must also conduct fuel analyses according to §63.7521 and establish maximum fuel pollutant input levels according to paragraphs (b)(1) through (3) of this section, as applicable, and as specified in §63.7510(a)(2). (Note that §63.7510(a)(2) exempts certain fuels from the fuel analysis requirements.) However, if you switch fuel(s) and cannot show that the new fuel(s) does (do) not increase the chlorine, mercury, or TSM input into the unit through the results of fuel analysis, then you must repeat the performance test to demonstrate compliance while burning the new fuel(s). [Regulatory Basis: §63.7530 (b)]
- You must establish the maximum mercury fuel input level (Mercury input) during the initial fuel analysis using the procedures in paragraphs (b)(2)(i) through (iii) of this section. [Regulatory Basis: §63.7530 (b)(2)}
- You must demonstrate continuous compliance with each emission limit in Tables 1 and 2 or 11 through 13 to this subpart, the work practice standards in Table 3 to this subpart, and the operating limits in Table 4 to this subpart that applies to you according to the methods specified in Table 8 to this subpart and paragraphs (a)(1) through (19) of this section. [Regulatory Basis: §63.7540(a)]
- Operation above the established maximum or below the established minimum operating limits shall constitute a deviation of established operating limits listed in Table 4 of this subpart except during performance tests conducted to determine compliance with the emission limits or to establish new operating limits. Operating limits must be confirmed or reestablished during performance tests. [Regulatory Basis: §63.7540(a)(1)]
- As specified in §63.7555(d), you must keep records of the type and amount of all fuels burned in each boiler or process heater during the reporting period to demonstrate that all fuel types and mixtures of fuels burned would result in ... Equal to or lower fuel input of chlorine, mercury, and TSM than the maximum values calculated during the last performance test, if you demonstrate compliance through performance testing. [Regulatory Basis: §63.7540(a)(2)]
- If you demonstrate compliance with an applicable mercury emission limit through performance testing, and you plan to burn a new type of fuel or a new mixture of fuels, you must recalculate the maximum mercury input using Equation 8 of §63.7530. If the results of recalculating the maximum mercury input using Equation

8 of §63.7530 are higher than the maximum mercury input level established during the previous performance test, then you must conduct a new performance test within 60 days of burning the new fuel type or fuel mixture according to the procedures in §63.7520 to demonstrate that the mercury emissions do not exceed the emission limit. You must also establish new operating limits based on this performance test according to the procedures in §63.7530(b). You are not required to conduct fuel analyses for the fuels described in §63.7510(a)(2)(i) through (iii). You may exclude the fuels described in §63.7510(a)(2)(i) through (iii) when recalculating the mercury emission rate [Regulatory Basis: §63.7540(a)(6)]

- Maintain the minimum carbon injection rate. Minimum activated carbon injection rate means load fraction multiplied by the lowest hourly average activated carbon injection rate measured according to Table 7 to this subpart during the most recent performance test demonstrating compliance with the applicable emission limit. [Regulatory Basis: Table 4 to Subpart DDDDD of Part 63]
- Establish a site-specific minimum activated carbon injection rate operating limit according to §63.7530(b) using data from the activated carbon rate monitors and mercury performance test as follows:
  a) You must collect activated carbon injection rate data every 15 minutes during the entire period of the performance tests.
  b) Determine the hourly average activated carbon injection rate by computing the hourly averages using all of the 15-minute readings taken during each performance test.
  c) Determine the lowest hourly average established during the performance test as your operating limit. When your unit operates at lower loads, multiply your activated carbon injection rate by the load fraction, as defined in §63.7575, to determine the required injection rate.
  [Regulatory Basis: Table 7 to Subpart DDDDD of Part 63]

- Dry Scrubber Sorbent or Carbon Injection Rate:
  a) Collecting the sorbent or carbon injection rate monitoring system data for the dry scrubber according to §§63.7525 and 63.7535; and
  b) Reducing the data to 30-day rolling averages; and
  c) Maintaining the 30-day rolling average sorbent or carbon injection rate at or above the minimum sorbent or carbon injection rate as defined in §63.7575. [Regulatory Basis: Table 8 to Subpart DDDDD of Part 63]

In addition to these provisions, ORCAA staff recommend the following additional conditions to assure effective operation of the PAC system and compliance with the mercury standard:

- Operate the PAC system whenever the boiler is combusting solid fuel.
- Operate the PAC system at PAC injection rates equivalent to the rates used during compliance testing .
- Operate the ESP whenever the PAC system operates.
- Monitor PAC bulk bag content level continuously and initiate replacement of the bulk bag as soon as it is emptied.
- Sample and analyze the sludge for mercury at a frequency sufficient to determine the maximum sludge rate that assures compliance with the mercury standard.
- Monitor PAC injection line and nozzles for blockages.

- Clean PAC injection nozzles routinely.

ORCAA staff recommends these conditions be imposed through the Approval Order issued by ORCAA.

Requirements as Authorized by Chapter 70A.15 RCW:

Requirements *"authorized by chapter 70A.15 RCW"* refers to performance standards that apply to specific categories of equipment such as boilers, engines incinerators, etc. RCW 70A.15.3050 requires every activated authority operating an air pollution control program to promulgate or adopt requirements for the control of emissions from stationary sources, which are no less stringent than those adopted by the Washington Department of Ecology (Ecology), for the geographic area in which such air pollution control program is located. Requirements less stringent than Ecology's requirements may be adopted only if approved by Ecology, and only after a public process. More stringent control requirements are allowed without Ecology's approval. ORCAA's program is comprised of ORCAA-specific, State, and federal performance standards, which are at least as stringent as the standards adopted by Ecology.

All air-related requirements applying to Boiler #11 must be included in the Air Operating Permit (AOP) for McKinley. Addition of the PAC system will require additional monitoring per the Boiler MACT. Conditions covering Boiler MACT requirements for the PAC system are included in the conditions of approval.

10. Requirements for Major Stationary Sources and Major Modifications to Major Stationary Sources – Prevention of Significant Deterioration (PSD)

Projects that are major stationary sources and major modifications to major stationary sources with respect to PSD may be subject to permitting requirements under WAC 173-400-700 through 173-400-860.

McKinley Paper is not a "Major Stationary Source" with respect to PSD under the permitting program required by WAC 173-400-700 through WAC 173-400-860. Therefore, these permitting requirements do not apply.

11. Title V Air Operating Permit (AOP) Implications

The State of Washington program pursuant to Title V of the federal Clean Air Act is governed under Chapter 173-401 WAC, the Washington Air Operating Permit Program. Chapter 173-401 WAC requires existing major stationary sources to operate in compliance with an approved Air Operating Permit (AOP). Major stationary sources are those stationary sources with a potential to emit which is greater than 100 tons per year of any criteria pollutant, greater than 10 tons per year of any hazardous air pollutants (HAP), or greater than 25 tons per year of any combination of HAP.

McKinley Paper is a "Major Source" under the Title V program and has operated with an effective Air Operating Permit (AOP) since February 1, 2000. The current, effective AOP for McKinley is 21RFC1549, which was issued May 18, 2022. Because approval of the PAC system will impose new compliance assurance and monitoring requirements, per Washington's AOP rules under Chapter 173-401 WAC, ORCAA is required to re-open McKinley's AOP and revise it to incorporate any new requirements. This requirement is triggered after the PAC system is approved and an Approval Order is issued. Reopening McKinley's AOP will require noticing the public and "Affected States," and will trigger a 30-day comment period and opportunity for a public hearing.

12. Conditions of Approval

The following conditions of approval are recommended by ORCAA staff:

1. **Approved Equipment.** The proposed Powdered Activated Carbon injection system (PAC system) as described in Notice of Construction application No. 22NOC1581 and the associated Final Determination, is approved subject to conditions in this Order of Approval.

[Regulatory Basis: ORCAA 6.1.2(l); WAC 173-400-114(1)]]

2. **PAC System Operation and Maintenance:**
   a) The PAC injection system must meet all requirements for operating and maintaining activated carbon injection systems per 40 CFR Part 63, Subpart DDDDD (the Boiler MACT).
   b) The ESP and Condensing Economizer must be operating and fully functional whenever the PAC system is operating.
   c) The PAC unit must be started as soon as possible after startup of Boiler #11.
   d) The PAC system hopper must be large enough to facilitate a PAC bulk bag change without interrupting PAC injection.

[Regulatory Basis: 40 CFR Part 63, Subpart DDDDD; ORCAA Rule 6.1.10(b)(2); WAC 173-400-114(2)(b)]

3. **Monitoring.** The PAC system must be monitored according to applicable requirements for activated carbon injection systems per the Boiler MACT as follows:
   a) The PAC injection rate must be monitored in terms of pounds per hour. Monitoring must be sufficient to determine the 30-day rolling average carbon injection rate whenever Boiler #11 is burning solid fuel and is not in startup or shutdown mode.
   b) During performance stack testing for mercury, the PAC injection rate must be monitored and recorded at 15-minute intervals or more frequently during test runs.
   c) The sludge combustion rate must be controlled to not exceed 600 gallons per minute, daily average.
   d) The mercury concentration and calorific content of both the composite fuel and of the sludge combusted must be determined in conjunction with any source testing for mercury. For purposes of meeting this condition, samples of the composite hog fuel and of the sludge must be taken concurrently or within an hour of each other.
   e) The Permittee must also conduct fuel analyses according to §63.7521 and establish maximum fuel mercury input levels according to paragraphs (b)(1) through (3) of

§63.7530, as applicable, and as specified in §63.7510(a)(2). [Regulatory Basis: §63.7530 (b)]

[Regulatory Basis: 40 CFR Part 63, Subpart DDDDD; ORCAA Rule 6.1.10(b)(2); WAC 173-400-114(2)(b)]

4. **Mercury Standard Compliance Assurance.** The Permittee must demonstrate continuous compliance with the mercury standard per 40 CFR Part 63, Subpart DDDDD (the Boiler MACT) as follows:
   a) Conduct performance testing according to §63.7520 on an annual basis, except as specified in paragraphs (b) through (e), (g), and (h) of §63.7515. [Regulatory Basis: §63.7515(a)]
   b) Performance testing for mercury must be conducted at representative operating load conditions while burning the type of fuel or mixture of fuels that has the highest content of mercury. [Regulatory Basis: §63.7520 (c); §63.7515 (b)]
   c) Except during startup and shutdown, maintain the 30-day rolling average carbon injection rate at or above the minimum carbon injection rate whenever Boiler #11 combusts solid fuels. Minimum activated carbon injection rate means load fraction multiplied by the lowest hourly average activated carbon injection rate measured during the most recent performance test demonstrating compliance with the mercury emission standard. [Regulatory Basis: Tables 4 and 8 to Subpart DDDDD of Part 63]
   d) Operating below the established minimum carbon injection rate limit constitutes a deviation of the requirement in paragraph (d) of this condition except during performance tests conducted to determine compliance with the mercury emission limit or to establish new operating limits. Operating limits must be confirmed or reestablished during performance tests. [Regulatory Basis: §63.7540(a)(1)]
   e) Establish the site-specific minimum carbon injection rate operating limit according to §63.7530(b) using data from the activated carbon rate monitor and mercury performance test as follows:
      i) Collect activated carbon injection rate data every 15 minutes during the entire period of the performance tests;
      ii) Determine the hourly average activated carbon injection rate by computing the hourly averages using all of the 15-minute readings taken during each performance test;
      iii) Determine the lowest hourly average carbon injection rate established during the performance tests as the operating limit. When Boiler #11 operates at lower loads, multiply the activated carbon injection rate by the load fraction, as defined in §63.7575, to determine the required injection rate. [Regulatory Basis: Table 7 to Subpart DDDDD of Part 63]
   f) Prior to burning a new type of fuel or a new mixture of fuels, the Permittee must recalculate the maximum mercury input using Equation 8 of §63.7530. If the results of recalculating the maximum mercury input are higher than the maximum mercury input level established during the previous stack performance test for mercury, then the Permittee must conduct a new performance test within 60 days of burning the new fuel type or fuel mixture according to the procedures in §63.7520 to demonstrate that the mercury emissions do not exceed the emission limit and to establish new operating limits. [Regulatory Basis: §63.7530 (b) and §63.7540(a)(6)]

[Regulatory Basis: 40 CFR Part 63, Subpart DDDDD; ORCAA Rule 6.1.10(b)(2); WAC 173-400-114(2)(b)]

5. **Record Keeping.** The following records must be maintained according to the Permittee's current, effective Air Operating Permit:
   a) Date and time the PAC unit is started and shutdown.
   b) PAC injection rates recorded at 15-minute intervals during performance stack testing for mercury must be included in performance stack testing reports for mercury.
   c) The minimum carbon injection rate limit determined during the most recent performance test demonstrating compliance with the mercury standard.
   d) 30-day rolling average carbon injection rates for all hours Boiler #11 was burning solid fuel and was not in startup or shutdown mode.
   e) Dates, times, and durations when the carbon injection rate was below the minimum carbon injection rate limit.

[Regulatory Basis: 40 CFR Part 63, Subpart DDDDD; ORCAA Rule 6.1.10(b)(2); WAC 173-400-114(2)(b)]

6. **Reporting**. According to the Permittee's current, effective Air Operating Permit.
[Regulatory Basis: ORCAA Rule 6.1.10(b)(2); WAC 173-400-114(2)(b)]

13. Final Determination to Approve

This Final Determination report documents ORCAA staff's determinations with respect to the applicable criteria of approval in ORCAA Rule 6.1.10 and WAC 173-400-114. ORCAA staff recommends approval of McKinley's proposal to install a permanent PAC system to control mercury emissions, provided the conditions identified in Section 12 of this Final Determination are implemented through an enforceable Order of Approval (AKA: Air Permit).

~ end ~

Mark V Goodin 9/1/2023

PREPARED BY: Mark V. Goodin **Date: September 1, 2023**

OL IPIC REGION CLEAN AIR AG ICY

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

FORM 1- NOTICE OF CONSTRUCTION

TO CONSTRUCT - INSTALL - ESTABLISH OR MODIFY AN AIR CONTAMINANT SOURCE

Form 1 Instructions:

1. Please complete all the fields below. **This NOC application is considered incomplete until signed.**
2. If the application contains any confidential business information, please complete a Request of Confidentiality of Records (www.orcaa.org/forms).
3. 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.

Business Name: **McKinley Paper Company – Washington Mill**	**For ORCAA use only** File No: 153 County No: 9 Source No: 7 Application No: 22NOC1591
Mailing Address: **1815 Marine Drive Port Angeles, WA 98363**	
Physical Address of Project or New Source: **1902 Marine Drive Port Angeles, WA 98363**	Date Received: Received DEC 13 2022 ORCAA
Billing Address: **Same as Mailing Address**	

Project or Equipment to be installed/established:

Powdered Activated Carbon injection system for additional mercury control from Boiler #11 (EU8).

Anticipated startup date: _TBD_ Is facility currently registered with ORCAA? Yes ☒ No ☐

This project must meet the requirements of the State Environmental Policy Act (SEPA) before ORCAA can issue final approval. Indicate the SEPA compliance option:

- ☐ SEPA was satisfied by _____ (government agency) on ___/___/___ (date) - Include a copy of the SEPA determination
- ☒ SEPA threshold determination by **City of Port Angeles** (government agency) is pending - Include a copy of the environmental checklist
- ☐ ORCAA is the only government agency requiring a permit - Include ORCAA Environmental Checklist
- ☐ This project is exempt from SEPA per _____ (WAC citation).

Name of Owner of Business: Biopappel S.A.B. de C.V.		Agency Use Only
Title: Fletcher Austin, General Manager		
Email: fletcher.austin@biopappel.com	Phone: (360) 565-7076	
Authorized Representative for Application (if different than owner):		
Title: Terry Nishimoto, Environmental Manager		
Email: terry.nishimoto@biopappel.com	Phone: (360) 565-7045	
I hereby certify that the information contained in this application is, to the best of my knowledge, complete and correct.		
Signature of Owner or Authorized Representative: (sign in Blue Ink)		
Jane Nishimoto	**Date:** 12/12/22	
IMPORTANT: Do not send via email or other electronic means. ORCAA must receive Original, hardcopy, signed application and payment prior to processing application.		

CONDITIONALLY APPROVED
FOR CONSTRUCTION ONLY
IN ACCORDANCE WITH
RCW 70A.15, WAC 173-400
ORCAA REGULATIONS
(SEE ATTACHED ADDENDUM FOR
CONDITIONS OF APPROVAL)

9/5/2023
DATE

ORCAA