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Air Operating Permit (AOP)

Sierra Pacific Industries, Shelton Mill

AOP – Reopening for Cause
19RFC1321
Final
October 15, 2021

AIR OPERATING PERMIT

Olympic Region Clean Air Agency
ORCAA

ISSUED IN ACCORDANCE WITH:
40 CFR Part 70, Chapter 70A.15 RCW, and Chapter 173-401 WAC

PERMIT NO:	19RFC1321
ISSUANCE DATE:	October 15, 2021
EXPIRATION DATE:	October 15, 2026
PERMITTEE & MAILING ADDRESS:	Sierra Pacific Industries – Shelton Division P.O. Box 700 Shelton, WA 98584
MILL LOCATION:	Sierra Pacific Industries – Shelton Division 100 N Front Street Shelton, WA 98584
PARENT COMPANY:	Sierra Pacific Industries
FACILITY DESCRIPTION:	Lumber Mill
ORCAA File #:	424
PRIMARY SIC:	2421
NAICS:	321113

REVIEWED BY: Mark V Goodin 10/15/21

APPROVED BY: Laurie L McCoy 10/15/2021

MARK V. GOODIN
STATE OF WASHINGTON
28948
REGISTERED
PROFESSIONAL ENGINEER

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I. ABBREVIATIONS

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

A#	Refers to a specific administrative term or condition numbered "#"
Administrator	EPA Region X Administrator
AOP	Air Operating Permit
AP-42	EPA Compilation of Emission Factors, AP-42, Fifth Edition, Volume I
AR#	Refers to a specific applicable requirement numbered "#"
ASTM	American Society for Testing and Materials
CEMS	Continuous Emissions Monitoring System
CFR	Code of Federal Regulations
CMS	Continuous Monitoring System
CO	Carbon monoxide
CO_2	Carbon Dioxide
COMS	Continuous Opacity Monitoring System
Ecology	Washington State Department of Ecology
EPA	U.S. Environmental Protection Agency
FCAA	Federal Clean Air Act
EU#	Refers to a specific emissions unit numbered "#"
G#	Refers to a specific general term or condition numbered "#"
grain/dscf	Concentration in terms of grains per dry standard cubic feet
HAP	Hazardous Air Pollutant
hp	Horsepower
M#	Refers to a specific monitoring term or condition numbered "#"
MACT	Maximum Achievable Control Technology
MMBtu/hr	Million British Thermal Units per hour
NESHAP	National Emission Standards for Hazardous Air Pollutants
NAICS	North American Industry Classification System
NCASI	The National Council for Air and Stream Improvement, Inc. (NCASI)
NOC	Notice of Construction
NO_x	Oxides of Nitrogen
NSPS	New Source Performance Standards
NSR	New Source Review
O_2	Oxygen
O&M	Operations and Maintenance Plan
PA#	Refers to a specific prohibited activity term or provision numbered "#"
PM	Particulate matter air pollution
PM_{10}	Particulate matter with aerodynamic diameter less than 10 microns
$PM_{2.5}$	Particulate matter with aerodynamic diameter less than 2.5 microns
ppm	Parts per million by volume (assumed standard and dry)
PSD	Prevention of Signification Deterioration
PW#	Refers to a plant-wide applicable requirement numbered "#"
RACT	Reasonably Available Control Technology
R#	Refers to a specific reporting term or condition numbered "#"
RCW	Revised Code of Washington

REQ	Requirement
RICE	Reciprocating Internal Combustion Engine
RK#	Refers to a specific record keeping term or condition numbered "#"
S#	Refers to a specific permit shield term or provision numbered "#"
SDS	Safety Data Sheets or Material Safety Data Sheets
SIC	Standard Industrial Classification
SMP	Site-specific Monitoring Plan – required by Boiler MACT and must address comprehensive plans for all CMS and CEMS
SO_2	Sulfur dioxide
TSP	Total Suspended Particulate
TAP	Toxic Air Pollutant as defined in Chapter 173-460 WAC
TPY	Tons per year
VOC	Volatile Organic Compounds
WAC	Washington Administrative Code
§	Refers to a section out of the Code of Federal Regulation

[END OF SECTION]

II. REGULATORY BASIS

Pursuant to Chapter 173-401 Washington Administrative Code (WAC), the “Permittee”, Sierra Pacific Industries - Shelton Division (SPI), is authorized to operate their lumber mill (Mill) located at 100 N Front Street in Shelton, Washington, in accordance with the terms and conditions listed in this permit.

This permit includes terms and conditions sufficient to assure compliance with all applicable air-related requirements at the time the permit was issued. The terms and conditions in this permit contain applicable emission limitations, performance standards, operating requirements, and other air-related applicable requirements as required under WAC 173-401-600, and monitoring, recordkeeping, and reporting requirements as required under WAC 173-401-615. In instances where an applicable limit or standard does not specify monitoring, or specifies monitoring but the monitoring is insufficient to assure compliance with the requirement, monitoring sufficient to assure compliance was added to the permit as required by WAC 173-401-615(1)(b), which is pursuant to authorities provided under 40 CFR §70.6(a)(3)(i)(B) and 40 CFR §70.6(c)(1) of the Federal Clean Air Act.

All terms and conditions of this permit, including any provisions designed to limit potential to emit, are enforceable under the Federal Clean Air Act (FCAA) unless specifically identified as not federally enforceable in the "regulatory basis" description that follows each condition. Conditions identified as "local only" are enforceable only by Olympic Region Clean Air Agency (ORCAA). Conditions identified as “state/local only” are enforceable only by ORCAA and state of Washington.

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

Unless otherwise stated, terms used in the conditions of this permit shall be defined consistent with their definitions from the corresponding referenced regulations. If not defined in the referenced regulations, terms shall be defined consistent with the definitions contained in Chapter 70A.15 RCW, WAC 173-401-200, WAC 173-400-030, and ORCAA Rule 1.4. Terms not defined in this permit or by applicable regulation shall be defined consistent with the Merriam-Webster's Collegiate Dictionary, Eleventh Edition © 2003 by Merriam-Webster Inc.

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

[*END OF SECTION*]

III. EMISSION UNIT (EU) IDENTIFICATION

The following emissions units are covered under this permit.

TABLE 2: Emissions Units Covered Under Permit

Emission Unit ID#	Description	Exhaust Point ID#	Control Equipment
EU1	**Wellons Boiler:** Wood fired boiler consisting of 6 Wellons fuel cells that burn wood residuals to generate steam for dry kilns. The Wellons wood fired boiler (Wellons Boiler) is rated at 140,000 pounds of steam per hour. For purposes of the boiler MACT standards, the Wellons Boiler is classified as a "Fuel cell units designed to burn biomass/bio-based solid". The Wellons Boiler is approved to burn clean woody biomass and certain clean fuels during startup as allowed by condition AR2.13. Clean woody biomass fuel includes hog fuel and may contain clean woody biomass from recycled construction demolition debris per conditions AR2.17 and AR2.18.	EP1	Multiclone and four field electrostatic precipitator (ESP)
EU2	**Backup Boiler:** The natural gas fired boiler (Backup Boiler) is used for production of auxiliary steam and when the Wellons Boiler is down for maintenance. The Backup Boiler combusts only natural gas and is rated at 20,000 pounds of steam per hour, which is equal to approximately 30 million Btus per hour (30 MMBtu/hr).	EP2	Combustion control.
EU3	Vacant		
EU4	**Lumber Mill Operations:** Encompasses all lumber milling and planning operations that generate wood residuals or dust including debarking units, hogs, chippers, saws, planers and sanders.	None - fugitive	Dust enclosure, capture and control systems sufficient to prevent visible fugitive dust.
EU5	**Lumber Dry Kilns:** Includes all lumber dry kilns at the Mill.	Not numbered: All vent at or above roof level.	• Computerized kiln management system. • Monitoring kiln drying temperatures. • Maintaining kiln dry bulb temperatures to prescribed temperature set points.
EU6	**Wood Residuals Handling Systems:** Encompasses all equipment and systems that collect, capture, transport, store and load wood residuals including: • Pneumatic transport systems • Conveyor transport systems • Cyclones • Baghouses • Wood residuals bins • Wood residuals piles	Not numbered:	• Exhaust from residuals transport systems controlled by baghouses. • Conveyors enclosed • Residual drop points enclosed or shrouded • Residuals bins enclosed
EU7	**Log Yard:** Includes all log yard operations	None – fugitive	• Paved log yard • Periodic log yard cleaning to remove dust and debris
EU8	**Anti-Mold System:** Includes the lumber spray system used to apply anti-mold/anti-stain solutions to lumber.	EP7	Equipped with a mist eliminator.
IEU14	**Spray Coating of End Shield:** Spray coating of the product "End Shield" to ends of lumber stacks.	None – fugitive	Use of low-VOC coating

Table Notes:

1. The information in Table 1 is for purposes of description only and is not intended as a limitation.
2. Insignificant emissions units are listed in the permit attachments.

[END OF SECTION]

IV. PERMIT ADMINISTRATION (A)

A1. Permit Duration. This permit is issued for a fixed term of 5 years from date of issuance.
[Origin: WAC 173-401-610]
[Authority: WAC 173-401-600(1)(b)]

A2. Federally Enforceable Requirements.

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

b) Notwithstanding subsection (a) of this condition, any terms and conditions included in this permit that are not required under the FCAA or under any of its applicable requirements are specifically designated as "state" or "local" only, and are not federally enforceable under the FCAA. Terms and conditions so designated are not subject to the requirements of WAC 173-401-810 and WAC 173-401-820.

[Origin: WAC 173-401-625]
[Authority: WAC 173-401-600(1)(b)]

A3. Standard Conditions:

a) Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. *[Origin: WAC 173-401-620(2)(b)]*

b) Permit Actions. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the Permittee for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. *[Origin: WAC 173-401-620(2)(c)]*

c) Property Rights. This permit does not convey property rights of any sort, or any exclusive privilege. *[Origin: WAC 173-401-620(2)(d)]*

d) Emission Trading. No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, other similar programs or processes for changes that are provided for in the permit. *[Origin: WAC 173-401-620(2)(g)]*

e) Severability. If any provision of this permit is to be held invalid, all unaffected provisions of the permit shall remain in effect and enforceable. *[Origin: WAC 173-401-620(2)(h)]*

f) Permit Appeals. This permit or any conditions in it may be appealed only by filing an appeal with the Washington State Pollution Control Hearings Board and serving it on ORCAA within thirty days from receiving the permit pursuant to RCW 43.21B.310. The provision for appeal in this section is separate from and in addition to any federal rights to petition and review under section 505(b) of the FCAA. *[Origin: WAC 173-401-620(2)(i)]*

g) Permit continuation. This permit and all terms and conditions contained herein, including any permit shield provided under WAC 173-401-640, shall not expire until the

renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect until the renewal permit has been issued or denied if a timely and complete application has been submitted. This protection shall cease to apply if, subsequent to a completeness determination, the applicant fails to submit any additional information identified as being needed to process the application by the deadline as specified, in writing, by ORCAA. *[Origin: WAC 173-401-620(2)(j)]*

[Origin: Listed per sub-condition]
[Authority: WAC 173-401-620(2)]

A4. Permit Renewal Application. The Permittee shall submit a complete renewal application to ORCAA at least 12 months, but no more than 18 months, prior to the expiration date of this permit.
[Origin: WAC 173-401-710(1)]
[Authority: WAC 173-401-600(1)(b)]

A5. Permit Expiration – Application Shield. Permit expiration terminates the Permittee's right to operate unless a timely and complete renewal application has been submitted consistent with condition A4. All terms and conditions of the permit shall remain in effect after the permit itself expires if a timely and complete permit application has been submitted.
[Origin: WAC 173-401-710(3)]
[Authority: WAC 173-401-600(1)(b)]

A6. Permit Revocation. The permitting authority may revoke a permit only upon the request of the Permittee or for cause. The permitting authority shall provide at least thirty days written notice to the holder of a current operating permit prior to revocation of the permit or denial of a permit renewal application. Such notice shall include an explanation of the basis for the proposed action and afford the Permittee/applicant an opportunity to meet with the permitting authority prior to the authority's final decision. A revocation issued under this section may be issued conditionally with a future effective date and may specify that the revocation will not take effect if the Permittee satisfies the specified conditions before the effective date.
[Origin: WAC 173-401-710(4)]
[Authority: WAC 173-401-600(1)(b)]

A7. Reopening for Cause - Proceedings to Reopen. The permit shall be re-opened and revised under any of the following circumstances:

- **a)** Additional requirements become applicable to the source with a remaining permit term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j);
- **b)** Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit;
- **c)** ORCAA or the Administrator determines that the permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
- **d)** ORCAA or the Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

Proceedings to reopen and issue this permit shall follow the same procedures that apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopening under this section shall not be initiated before a notice of such intent is provided to the Permittee by the permitting authority. Such notice shall be made at least 30 days in advance of the date that the permit is to be reopened, except that the permitting authority may provide a shorter time period in the case of an emergency.
[Origin: WAC 173-401-730]
[Authority: WAC 173-401-600(1)(b)]

A8. Changes not Requiring Permit Revision/Off Permit Changes. The Permittee may make the changes described in WAC 173-401-722 and WAC 173-401-724 without revising this permit, provided the changes satisfy the criteria set forth in those sections, including the requirements to notify ORCAA and EPA.
[Origin: WAC 173-401-722; WAC 173-401-724]
[Authority: WAC 173-401-600(1)(b)]

A9. Administrative Permit Amendments. The Permittee may request an "administrative permit amendment" for the following types of permit revisions:

- **a)** Correction of typographical errors;
- **b)** Change the name, address, or phone number of any person identified in the permit, or provide a similar minor administrative change at the source;
- **c)** Require more frequent monitoring or reporting by the Permittee;
- **d)** Allow for a change in ownership or operational control of a source where the permitting authority determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility,

coverage, and liability between the current and new Permittee has been submitted to the permitting authority; and,

e) Incorporate into the AOP, permit the terms, conditions, and provisions from orders approving NOC applications processed under an EPA-approved program.

Application and approval of administrative permit amendment applications shall conform to the procedures in WAC 173-401-720.
[Origin: WAC 173-401-720]
[Authority: WAC 173-401-600(1)(b)]

A10. Permit Modifications. Permit revisions which cannot be accomplished using the provisions for administrative permit amendments shall be applied for and approved as a permit modification according to WAC 173-401-725.
[Origin: WAC 173-401-725]
[Authority: WAC 173-401-600(1)(b)]

A11. Credible Evidence. For purposes of certifying compliance or establishing whether or not the Permittee has violated or is in violation of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with the requirements if the appropriate performance or compliance test or procedure had been performed.
[Origin: 40 CFR § 51.212; 40 CFR § 52.12; 40 CFR § 52.33; 40 CFR § 61.12]
[Authority: WAC 173-401-600(1)(a)]

A12. Emergency Provision:

a) Definition. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God and force majeure, which requires immediate corrective action to restore normal operation, and causes the source to exceed a technology-based emission limitation under the AOP, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

b) Effect of an emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations.

c) Reporting. To qualify as an emergency, the Permittee must report the emergency to ORCAA according to condition R4.

d) Criteria. The affirmative defense of emergency must be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that demonstrating to ORCAA that:

i) An emergency occurred and the Permittee can identify the cause(s) of the emergency;

ii) The Mill was at the time being properly operated;

iii) During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the AOP; and

iv) The notice submitted to ORCAA must contain descriptions of:

(1) The emergency;
(2) Steps taken to mitigate emissions;
(3) Corrective actions taken;
(4) The probable cause; and,
(5) Preventive measures taken.

e) Burden of proof. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

f) Relationship to other rules. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

[Origin: WAC 173-401-615; WAC 173-401-645; ORCAA Rule 8.7 (local only)]
[Authority: WAC 173-401-600(1)(b)]

A13. Unavoidable Excess Emissions (Current SIP). The following conditions apply until the effective date of EPA's removal of the September 20, 1993 version of WAC 173-400-107 from the Washington State Implementation Plan after which they become inapplicable:

a) Effect of "Unavoidable Excess Emissions" Determination. Excess emissions determined to be unavoidable under the procedures and criteria in this condition shall be excused and not subject to penalty.

b) Burden of Proof. To qualify for relief, the Permittee shall have the burden of proving to ORCAA in an enforcement action, the excess emissions were unavoidable. This demonstration shall be a condition to obtaining relief (from penalty).

c) Criteria. Excess emissions due to an upset or malfunction will be considered unavoidable provided the Permittee:

i) Reports as required under condition R4.

ii) Upon request by ORCAA, submits a full written report including the known causes, the corrective actions taken, and the preventive measures to be taken to minimize or eliminate the chance of recurrence.

iii) For excess emissions due to startup or shutdown conditions, the Permittee adequately demonstrates the excess emissions could not have been prevented through careful planning and design and, if a bypass of control equipment occurs, such bypass was necessary to prevent loss of life, personal injury, or severe property damage.

iv) For excess emissions due to scheduled maintenance, the Permittee adequately demonstrates the excess emissions could not have been avoided through reasonable design, better scheduling for maintenance or through better operation and maintenance practices.

v) For excess emissions due to a malfunction or upset, the Permittee adequately demonstrates that:

(1) The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition;
(2) The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance; and
(3) The Permittee took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emission unit as necessary to minimize emissions, when the Permittee knew or should have known that an emission standard or permit condition was being exceeded.

[Origin: WAC 173-400-107; ORCAA Rule 8.7 (local only)]
[Authority: WAC 173-401-600(1)(b)]

A14. Unavoidable Excess Emissions (Post SIP Change). The following conditions apply starting the effective date of EPA's removal of the September 20, 1993, version of WAC 173-400-107 from the Washington State Implementation Plan:

a) Effect of "Unavoidable Excess Emissions" Determination. Excess emissions determined to be unavoidable under the procedures and criteria in this section are:
  i) A violation subject to WAC 173-400-230 (3), (4), and (6); but
  ii) Not subject to civil penalty under WAC 173-400-230(2).

b) Determination. ORCAA determines whether excess emissions are unavoidable based on the information supplied by the Permittee and the criteria in subsection (f) of this condition.

c) Burden of Proof. To qualify for relief, the Permittee shall have the burden of proving to ORCAA in an enforcement action that excess emissions were unavoidable. This demonstration shall be a condition to obtaining relief under (a)(ii) of this condition. To claim emissions as unavoidable under this condition, reported information must include:
  i) Properly signed contemporaneous records or other relevant evidence documenting the Permittee's actions in response to the excess emissions event;
  ii) Information on whether installed emission monitoring and pollution control systems were operating at the time of the exceedance. If either or both systems were not operating, information on the cause and duration of the outage; and
  iii) Any additional information requested by ORCAA to support the claim the excess emissions were unavoidable.

d) Limitation. This condition (condition A14) does not apply to an exceedance of an emission standard in 40 CFR Parts 60, 61, 62, 63, or 72, or ORCAA's adoption by reference of these federal standards.

e) Startups and Shutdowns. Excess emissions that occur due to an upset or malfunction during a startup or shutdown event are treated as an upset or malfunction under subsection (g) of this section.

f) Criteria. Excess emissions due to an upset or malfunction will be considered unavoidable provided the Permittee reports as required under R4 and adequately demonstrates to ORCAA that:

i) The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition;

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

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

iv) If the emitting equipment could not be shutdown during the malfunction or upset to prevent the loss of life, prevent personal injury or severe property damage, or to minimize overall emissions, repairs were made in an expeditious fashion;

v) All emission monitoring systems and pollution control systems were kept operating to the extent possible unless their shutdown was necessary to prevent loss of life, personal injury, or severe property damage;

vi) The amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent possible; and

vii) All practicable steps were taken to minimize the impact of the excess emissions on ambient air quality.

g) Required information. In addition to the information required under condition R4, the excess emissions report to ORCAA must include:

i) Properly signed contemporaneous records or other relevant evidence documenting the Permittee's actions in response to the excess emissions event;

ii) Information on whether installed emission monitoring and pollution control systems were operating at the time of the exceedance. If either or both systems were not operating, information on the cause and duration of the outage; and

iii) Any additional information requested by ORCAA to support the claim the excess emissions were unavoidable.

[Origin: WAC 173-400-109; ORCAA Rule 8.7 (local only)]
[Authority: WAC 173-401-600(1)(b)]

[END OF SECTION]

V. GENERAL TERMS AND CONDITIONS (G)

G1. Operating Permit Fees: The Permittee shall pay operating permit fees according to ORCAA Rule 3.2 as follows:

- **a)** Operating permit fees include annual air operating permit fees and annual Ecology development and oversight fees. *[Origin: ORCAA Rule 3.2(c)]*
- **b)** Upon receipt of a fee invoice from ORCAA, annual fees are due and payable and shall be deemed delinquent if not fully paid within thirty (30) days. However, the Permittee may choose to pay annual fees in quarterly installments by indicating so on the fee invoice received and remitting payment of the first quarterly installment back to the Agency. These installments shall be due October 1, January 1, and April 1, following initial payment. Quarterly installments shall be equal to twenty-five percent (25%) of the total fee amount due. Any penalty shall be in addition to the fee amount due. *[Origin: ORCAA Rule 3.2(j)]*
- **c)** Clarification. ORCAA prints the fee due date directly on all operating permit fee invoices. Any operating permit fees not paid on or before the due date printed on the invoice are considered late. *[Added for clarification per WAC 173-401-630]*
- **d)** Late Payment. The Permittee shall pay a late penalty equal to twenty-five percent (25%) of the fee amount due if assessed by ORCAA for failure to pay the annual fee or installment by the Invoice Due Date. Any late penalty shall be in addition to the fee amount due. *[Origin: ORCAA Rule 3.2(k)]*
- **e)** Annual fees may be appealed per the procedure specified in ORCAA Rule 1.8. The basis for such appeals shall be limited to arithmetic or clerical errors. *[Origin: ORCAA Rule 3.2(l)]*
- **f)** Transfer of ownership of an Operating Permit source shall not affect any obligation to pay annual fees required by ORCAA Rule 3.2. Any liability for fee payment, including payment of delinquent fees and other penalties, shall survive any transfer of ownership of an Operating Permit source. *[Origin: ORCAA Rule 3.2(n)]*

[Origin: ORCAA Rule 3.2 and as noted per sub-condition above]
[Authority: WAC 173-401-620(2)]

G2. Duty to Supplement or Correct Application. The Permittee, upon becoming aware that any relevant facts were omitted, or incorrect information was submitted in the permit application, shall promptly submit such facts or corrected information.
[Origin: WAC 173-401-500(6)]
[Authority: WAC 173-401-600(1)(b)]

G3. Confidential Information. The Permittee is responsible for certifying and clearly identifying any information considered proprietary and confidential. In the case where a Permittee has submitted information to ORCAA under a claim of confidentiality, ORCAA may also require the Permittee to submit a copy of such information directly to the Administrator of EPA. The Permittee is responsible for clearly identifying information considered proprietary and

confidential prior to submittal to ORCAA. In addition, all confidential information shall be submitted according to ORCAA's Public Records and Confidentiality Procedures.
[Origin: WAC 173-401-500(5); WAC 173-401-630(1); ORCAA Rule 1.6 (local only)]
[Authority: WAC 173-401-600(1)(b)]

G4. Duty to Provide Information. The Permittee shall furnish to ORCAA, within a reasonable time, any information that ORCAA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the Permittee shall also furnish to ORCAA copies of records that the Permittee is required to keep by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to ORCAA along with a claim of confidentiality per condition R2. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70A.15.2510.
[Origin: WAC 173-401-620(2)(e)]
[Authority: WAC 173-401-620(2)]

G5. Certification. All documents required to be submitted by this permit shall contain certification by a responsible official of truth, accuracy, and completeness. Documents include any application form, report, or compliance certification including but not limited to test plans and results, monitoring plans and results, applications, emissions inventory submittals, equipment malfunction reports or annual compliance certification. Such certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Provided, however, where a report is sent more frequently than once every six months, the responsible official's certification need only be submitted once every six months, covering all required reporting since the date of the last certification.
[Origin: WAC 173-401-520; WAC 173-401-615(3)(a); WAC 173-401-630(1)]
[Authority: WAC 173-401-600(1)(b)]

G6. Duty to comply. The Permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation of Chapter 70.A15 RCW and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
[Origin: WAC 173-401-620(2)(a)]
[Authority: WAC 173-401-620(2)]

G7. Compliance Maintenance. The Permittee shall maintain compliance with all applicable requirements with which the source was in compliance as of the date of permit issuance. The Permittee shall meet on a timely basis any applicable requirements that become effective during the permit term.
[Origin: WAC 173-401-510(2)(h)(iii); WAC 173-401-630(3)]
[Authority: WAC 173-401-600(1)(b)]

G8. Inspection and Entry. Upon presentation of appropriate credentials, the Permittee shall allow a representative from ORCAA or an authorized representative to perform the following:

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

[Origin: WAC 173-401-630(2)]
[Authority: WAC 173-401-600(1)(b)]

G9. Access for Inspection. No person shall refuse entry or access to an ORCAA representative who requests entry for the purpose of inspection, and who presents appropriate credentials; nor shall any person obstruct, hamper or interfere with any such inspection.
[Origin: ORCAA Rule 1.5(e) (local only); ORCAA Rule 7.1 (local only)]
[Authority: WAC 173-401-600(1)(b)]

G10. Insignificant Emission Units. The following applies to emissions units determined insignificant based on actual emissions in accordance with WAC 173-401-530(1)(a):

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

[Origin: WAC 173-401-530]
[Authority: WAC 173-401-600(1)(b)]

G11. New Source Review. Prior to commencing any new installation, replacement, modification or alteration of any stationary source, emission unit, area source or fugitive source, the Permittee shall secure all necessary approvals under Rule 6.1 of ORCAA Regulations.
[Origin: WAC 173-400-110; WAC 173-460-040; ORCAA Rule 6.1 (local only); ORCAA Rule 8.6(a) (local only)]
[Authority: WAC 173-401-600(1)(b)]

G12. Replacement or Substantial Alteration of Existing Control Equipment. Notification, review and approval by ORCAA according to Rule 6.1 of ORCAA's regulations is required prior to replacing or substantially altering any approved air pollution control technology or device.
[Origin: WAC 173-400-114; ORCAA Rule 6.1.10 (local only)]
[Authority: WAC 173-401-600(1)(b)]

G13. Temporary Sources. The Permittee may operate portable air contaminant sources at temporary locations within the Facility subject to this permit provided the Permittee has complied with the requirements for temporary portable sources under ORCAA Rules 6.1.1.
[Origin: WAC 173-401-635; ORCAA 6.1.7(local only)]
[Authority: WAC 173-401-600(1)(b)]

G14. Prevention of Significant Deterioration (PSD). A PSD permit application must be filed by the permittee and a PSD permit issued by Department of Ecology prior to the establishment of any new source in accordance with the cited regulations. No major stationary source or major modification as defined in the cited regulation shall begin actual construction without having received a PSD permit. Allowable emissions from the proposed major stationary source or major modification shall not cause or contribute to a violation of any ambient air quality standard. An applicant for a PSD permit must submit an application that provides complete information for Department of Ecology to determine compliance with all PSD program requirements. Detailed procedures for submitting a complete application, for public review and involvement, and for revisions to an existing PSD permit are provided in the cited regulations (WAC 173-400-700 through 750).
[Origin: WAC 173-400-117 (state only); WAC 173-400-700, -710, -720, -730, - 740, - 750 (state only)]
[Authority: WAC 173-401-600(1)(b)]

G15. Demolition and Asbestos Projects. The Permittee shall comply with all notification and approval requirements in Rule 6.3 of ORCAA Regulations prior to commencing any asbestos, renovation, or demolition project at the Mill as defined in ORCAA Rule 6.3.1. The Permittee shall conduct all renovation, demolition and asbestos projects in accordance with applicable asbestos control standards and requirements in ORCAA Rule 6.3.
[Origin: ORCAA Rule 6.3 (local only)]
[Authority: WAC 173-401-600(1)(b)]

G16. Demolition and Renovation Projects. The Permittee shall notify ORCAA prior to commencing any renovation or demolition activities at the Mill as defined in 40 CFR §61.141. The Permittee shall conduct all renovation, demolition and asbestos projects in accordance with applicable asbestos control standards and requirements in Subpart M of 40 CFR Part 61.
[Origin: 40 CFR Part 61, Subpart M]
[Authority: WAC 173-401-600(1)(a)]

G17. Protection of Stratospheric Ozone. The Permittee shall comply with the standards for recycling and emissions reduction as provided in 40 CFR Part 82, Subparts B and F.
[Origin: 40 CFR Part 82, Subparts B & F]
[Authority: WAC 173-401-600(1)(a)]

G18. Reasonably Available Control Technology (RACT):

a) **General Standards for Maximum Emissions.** All emissions units are required to use reasonably available control technology (RACT) which may be determined for some sources or source categories to be more stringent than the applicable emission limitations of any chapter of Title 173 WAC. *[Origin: WAC 173-400-040(1)(c) (state/local only)]*

b) **General Standards for Maximum Particulate Matter.** All emissions units are required to use reasonably available control technology (RACT) which may be determined for some sources or source categories to be more stringent than the applicable emission limitations of ORCAA Regulations. *[Origin: ORCAA Rule 8.3 (local only)]*

c) Emission standards and other requirements contained in rules or regulatory orders in effect at the time of this permit issuance shall be considered RACT for the purposes of issuing this permit. *[Origin: WAC 173-401-605(3)]*

[Origin: Listed by sub-condition]
[Authority: WAC 173-401-600(1)(b)]

G19. Outdoor Burning. The requirements under ORCAA Rule 6.2 and Chapter 173-425 WAC apply to all outdoor burning conducted at the Mill.
[Origin: Chapter 173-425 WAC; ORCAA Rule 6.2 (local only)]
[Authority: WAC 173-401-600(1)(b)]

G20. Wood Heating. Any wood combustion device used for space heating shall comply with the requirements in ORCAA Rule 8.1 and Chapter 173-433 WAC.
[Origin: Chapter 173-433 WAC; ORCAA Rule 8.1 (local only)]
[Authority: WAC 173-401-600(1)(b)]

G21. Burning Used Oil in Land Based Facilities: The Permittee may not burn used oil as fuel at the Mill unless:

a) The used oil meets the standards in ORCAA Rule 8.9. *[Origin: ORCAA Rule 8.9 (local only)]*

b) If burned in an emissions unit, the Permittee first secures approval of the fuel change according to condition G11. *[Origin: ORCAA Rule 6.1 (local only)]*

[Origin: Listed by sub-condition]
[Authority: WAC 173-401-600(1)(b)]

G22. Gasoline Dispensing Facilities. Any gasoline dispensing facility located within the property boundary of the major source regulated by this AOP shall comply with the requirements in ORCAA Rule 8.12 and WAC 173-491-040.
[Origin: WAC 173-491-040 (state/local only); ORCAA Rule 8.12 (local only)]
[Authority: WAC 173-401-600(1)(b)]

G23. Greenhouse Gas Reporting Fee. The Permittee must pay a greenhouse gas (GHG) reporting fee for each year they are required to submit a GHG report to Ecology. Fees will be paid according to Ecology's fee schedule. Fees must be paid within sixty days of receipt of Ecology's billing statement.
[WAC 173-441-110 (state only)]
[Authority: WAC 173-401-600(1)(b)]

[END OF SECTION]

V. PROHIBITED ACTIVITIES (PA)

PA1. Emissions Detrimental to Persons or Property Prohibited. No person shall cause or allow the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business.
[Origin: WAC 173-400-040(1)(a) (state/local only); WAC 173-400-040(6) (state/local only); ORCAA Rule 7.6 (local only)]
[Authority: WAC 173-401-600(1)(b)]

PA2. Unreasonable Odors Prohibited. No person shall cause or allow the emission or generation of any odor from any source, that unreasonably interferes with another person's use and enjoyment of their property.
[Origin: ORCAA Rule 8.5(c) (local only)]
[Authority: WAC 173-401-600(1)(b)]

PA3. Unreasonable Fallout Prohibited. No person shall cause or permit the emission of particulate matter from any source to be deposited beyond the property under direct control of the owner(s) or operator(s) of the source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited.
[Origin: WAC 173-400-040(1)(a); WAC 173-400-040(3); ORCAA Rule 8.3(e) (local only)]
[Authority: WAC 173-401-600(1)(b)]

PA4. Concealment and Masking Prohibited:

- **a)** No person shall cause or allow the installation or use of any device or use of any means, which conceals or masks an emission of air contaminant, which would otherwise violate any provisions of ORCAA's Regulations or chapter 173-400 WAC.
- **b)** No person shall cause or allow the installation or use of any device or use of any means designed to conceal or mask the emission of an air contaminant, which causes detriment to health, safety, or welfare of any person, or cause damage to property or business.
- **c)** Such concealment includes, but is not limited to:
  - **i)** The use of diluents to achieve compliance with a relevant standard based on the concentration of a pollutant in the effluent discharged to the atmosphere;
  - **ii)** The use of gaseous diluents to achieve compliance with a relevant standard for visible emissions.

[Origin: 40 CFR § 63.4(b); WAC 173-400-040(1)(a) (state/local only); WAC 173-400-040(8) (state/local only); ORCAA Rule 7.5 (local only)]
[Authority: WAC 173-401-600(1)(b)]

PA5. Circumvention Prohibited. Building, erecting, installing, or using any article, machine, equipment, or process to conceal an emission, that would otherwise constitute noncompliance with a relevant standard, is prohibited. Such concealment includes, but is not limited to:

a) The use of diluents to achieve compliance with a relevant standard based on the concentration of a pollutant in the effluent discharged to the atmosphere; and,

b) The use of gaseous diluents to achieve compliance with a relevant standard for visible emissions.

[Origin: 40 CFR § 60.12; 40 CFR § 63.4(b)]
[Authority: WAC 173-401-600(1)(a)]

PA6. Fragmentation Prohibited. Fragmentation 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.
[Origin: 40 CFR § 63.4(c)]
[Authority: WAC 173-401-600(1)(a)]

PA7. False or Misleading Statements Prohibited. No person shall willfully make a false or misleading statement to ORCAA as to any matter within the jurisdiction of ORCAA. No person shall make any false material statement, representation or certification in any form, notice or report required under chapter 70A.15 or 70.120 RCW, or any ordinance, resolution, regulation, permit or order in force pursuant thereto.
[Origin: WAC 173-400-105(6) (state/local only); ORCAA Rule 7.2 (local only)]
[Authority: WAC 173-401-600(1)(b)]

[END OF SECTION]

VI. APPLICABLE REQUIREMENTS (APPLICABLE EMISSIONS LIMITS, WORK PRACTICE AND OPERATING REQUIREMENTS)

AR#	Requirements	Applicability	Monitoring
	General Standards and Limits Applying Mill-wide		
1.1	**Opacity Standard (State).** No person shall cause or allow the emission for more than three minutes, in any one hour, of an air contaminant from any emissions unit which at the emission point, or within a reasonable distance of the emission point, exceeds twenty percent opacity as determined by ecology method 9A. The following are exceptions to this standard: 1) When the owner or operator of a source supplies valid data to show the presence of uncombined water is the only reason for the opacity to exceed twenty percent. 2) The soot blowing or grate cleaning alternate visible emission standard described in WAC 173-400-040(2)(a)(i), until the effective date of EPA's removal of the September 20, 1993, version of WAC 173-400-107 from the SIP. 3) The following exceptions upon the effective date of EPA's removal of the September 20, 1993, version of WAC 173-400-107 from the SIP: a) The exception for soot blowing or grate cleaning of a wood-fired boiler described in WAC 173-400-040(2)(a)(ii) b) The exception for startup and shutdown of a hog fuel or wood-fired boiler in operation before January 24, 2018 as described in WAC 173-400-040(2)(e); and, c) The exception for curing furnace refractory in a boiler described in WAC 173-400-040(2)(f). **Reference Test Method:** Ecology Method 9A. *[Origin: WAC 173-400-040(1)(a) (state/local only); WAC 173-400-040 (2) (state/local only)]* *[Authority: WAC 173-401-600(1)(b)]*	Applies Mill-wide to emissions from vents, stacks and ducts.	M1 M2
1.2	**Opacity Standard (ORCAA).** a) In equipment or facilities, including boilers using hogged fuel, regardless of their date of installation, no person shall cause or allow the emission to the outdoor atmosphere, for more than three (3) minutes in any one hour, of a gas stream containing air contaminants which are greater than 20% opacity. b) Observations shall be made by trained and certified observers or by LIDAR instrumentation. c) The exceptions to the opacity standard stated in (a) above are as follows:	Applies Mill-wide to emissions from vents, stacks and ducts.	M1 M2

AR#	Requirements	Applicability	Monitoring
	i) Emissions occurring due to soot blowing or grate cleaning may be greater than 20% opacity; providing the operator can demonstrate soot blowing or grate cleaning will not exceed a total of 15 minutes in any consecutive 8 hours. This practice, except for testing and troubleshooting, is to be scheduled for the same approximate times each day and ORCAA shall be advised of the schedule. ii) When the owner or operator of a source supplies valid data to show the presence of uncombined water is the only reason for the opacity to exceed 20%. **Reference Test Method:** Ecology Method 9A. *[Origin: ORCAA Rule 8.2 (local only)]* *[Authority: WAC 173-401-600(1)(b)]*		
1.3	**Fugitive Emissions Control.** The owner or operator of any emission unit engaging in materials handling, construction, demolition or any other operation which is a source of fugitive emissions shall take reasonable precautions to prevent release of air contaminants from the operation. *[Origin: WAC 173-400-040(1)(a); WAC 173-400-040(4)(a)]* *[Authority: WAC 173-401-600(1)(b)]*	Applies Mill-wide	M1 M2 M4
1.4	**Fugitive Dust Control.** The owner or operator of a source or activity, that generates fugitive dust, must take reasonable precautions to prevent fugitive dust from becoming airborne and must maintain and operate the source to minimize emissions. *[Origin: WAC 173-400-040(1)(a) (state/local only); WAC 173-400-040(9)(a) (state/local only); ORCAA Rule 8.3(c)-(d) (local only)]* *[Authority: WAC 173-401-600(1)(b)]*	Applies Mill-wide	M1 M2 M4
1.5	**Odor Control (State).** Any person who shall cause or allow the generation of any odor from any source or activity which may unreasonably interfere with any other property owner's use and enjoyment of her or his property must use recognized good practice and procedures to reduce these odors to a reasonable minimum. *[Origin: WAC 173-400-040(1)(a) (state/local only); WAC 173-400-040(5) (state/local only)]* *[Authority: WAC 173-401-600(1)(b)]*	Applies Mill-wide	M3
1.6	**Odor Control (ORCAA).** Reasonably available control technology (RACT) shall be installed and operated to mitigate odor-bearing gases emitted into the atmosphere to a minimum, or, so as not to create air pollution. *[Origin: ORCAA Rule 8.5(a) (local only)]* *[Authority: WAC 173-401-600(1)(b)]*	Applies Mill-wide	M3

AR#	Requirements	Applicability	Monitoring
1.7	**Sulfur dioxide.** No person shall cause or allow the emission of a gas containing sulfur dioxide from any emissions unit in excess of one thousand ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based on the average of any period of sixty consecutive minutes. **Reference Test Methods:** 40 CFR Part 60 Appendix A. *[Origin: WAC 173-400-040(1)(a); WAC 173-400-040(7)]* *[Authority: WAC 173-401-600(1)(b); WAC 173-401-605(1)]*	Applies Mill-wide	M5
1.8	**Particulate Standards for Combustion Units.** No person shall cause or allow emissions of particulate matter in excess of 0.23 gram per dry cubic meter at standard conditions (0.1 grain/dscf), except, for an emissions unit combusting waste wood for the production of steam. No person shall allow the emission of particulate matter in excess of 0.46 gram per dry cubic meter at standard conditions (0.2 grain/dscf), as measured by 40 CFR Part 60, Appendix A, Test Method 5 (in effect on the date in WAC 173-400-025) or approved procedures in *Source Test Manual - Procedures for Compliance Testing*, state of Washington, department of ecology, as of September 20, 2004, on file at ecology. **Reference Test Methods:** 40 CFR Part 60, Appendix A, Test Method 5 (in effect on the date in WAC 173-400-025) or approved procedures in Source Test Manual - Procedures for Compliance Testing, state of Washington, department of ecology, as of September 20, 2004, on file at ecology. *[Origin: WAC 173-400-050(1) (state/local only)]* *[Authority: WAC 173-401-600(1)(b); WAC 173-401-605(1)]*	Applies Mill-wide to combustion emissions units	M1 M2
1.9	**ORCAA Particulate Standards.** a) In equipment or facilities except boilers using hog fuel, no person shall cause or allow the emission of particulate matter to the outdoor atmosphere from any single source in excess of 0.10 grains per standard cubic foot of gas (calculated at 7% oxygen). Particulate test procedures, on file at the Authority, will be used to determine compliance. The Authority includes the Method 5 back-half condensable particulate matter for determining compliance with particulate matter standards. b) Hogged Fuel Boilers: No person shall cause or allow the emission of particulate matter to the outdoor atmosphere from any single source in excess of 0.20 grains per standard cubic foot of gas (calculated at 7% oxygen). Particulate test procedures, on file at the Authority, will be used to determine compliance. The Authority includes the Method 5 back-half condensable particulate matter for determining compliance with particulate matter standards.	Applies Mill-wide to all emissions units	M1 M2

AR#	Requirements	Applicability	Monitoring
	Reference Test Methods: Particulate test procedures, on file at the Authority, will be used to determine compliance. The Authority includes the Method 5 (EPA Reference Method 5 from 40 CFR Part 60, Appendix A) back-half condensable particulate matter for determining compliance with particulate matter standards. *[Origin: ORCAA Rule 8.3(a)&(b) (local only)]* *[Authority: WAC 173-401-600(1)(b); WAC 173-401-605(1)]*		
1.10	**Particulate Standards for Process Units.** No person shall cause or allow the emission of particulate material from any general process operation in excess of 0.23 grams per dry cubic meter at standard conditions (0.1 grain/dscf) of exhaust gas. **Reference Test Methods:** Test methods from 40 CFR Parts 51, 60, 61, or 63 (in effect on the date in WAC 173-400-025) and any other approved test procedures in ecology's "*Source Test Manual - Procedures For Compliance Testing*" as of September 20, 2004, must be used to determine compliance. *[Origin: WAC 173-400-040(1)(a); WAC 173-400-060 (state/local only)]* *[Authority: WAC 173-401-600(1)(b); WAC 173-401-605(1)]*	Applies Mill-wide to all process emissions units	M1 M2
1.11	**Maintenance and Repair of Process and Air Pollution Control Equipment.** All air contaminant sources are required to keep any process and air pollution control equipment in good operating condition and repair. *[Origin: ORCAA Rule 8.8 (local only)]* *[Authority: WAC 173-401-600(1)(b)]*	Applies to any emissions unit with connected air pollution control equipment	RK8
1.12	**Mill-wide Voluntary CO Limit:** Mill-wide emissions of Carbon Monoxide (CO) shall not exceed 249 tons over any 12-consecutive-month period. CO emissions from the existing Wellons Boiler (EU1) shall be based on the CO Continuous Emissions Monitoring System (CO CEMS). During CO CEMS malfunction, CO emissions shall be calculated using ORCAA-approved emissions factors. CO emissions from the existing gas-fired boiler shall be based on an emissions factor of 84 pounds per million standard cubic foot ($lb/10^6scf$) of natural gas combusted in the gas boiler and the record of gas consumption. *[Origin: 19NOR1326, condition 7a (5/12/2021)]* *[Authority: WAC 173-401-600(1)(c)]*		M8 M9 M15
Applicable Requirements for Wellons Boiler (EU1)			
N/A	**Classification under 40 CFR Part 63, Subpart DDDDD.** For purposes of regulation under 40 CFR Part 63, Subpart DDDDD, the Wellons Boiler is classified as an existing "Fuel Cell" boiler.	Wellons Boiler	N/A

AR#	Requirements	Applicability	Monitoring
2.1	**Wellons Boiler NSPS Opacity Limit:** a) Wellons Boiler stack emissions shall not exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. *[Origin: 40 CFR 60.43b(f)]* b) This limit applies at all times except during periods of startup, shutdown or malfunction. *[Origin: 40 CFR 60.43b(g) and 60.46b(a)]* c) The Reference Method for determining compliance with this limit is Method 9 of appendix A of 40 CFR Part 60. *[Origin: 40 CFR Part 60.46b(d)(7)]* d) Compliance with this limit shall be monitored continuously according to condition M7 below. *[Origin: 40 CFR 60.48b(a)]* *[Origin: listed by sub-condition]* *[Authority: WAC 173-401-600(1)(a); and, and WAC 173-401-605(1)]*	Wellons Boiler	M1 M2 M7 M14
2.2	**Wellons Boiler BACT Opacity Limit.** Wellons Boiler stack emissions shall not exceed twenty (20) percent opacity for three minutes in any one hour as determined by opacity reading procedures of EPA Reference Method 9 of 40 CFR Part 60, Appendix A, except that the minimum number of consecutive readings allowed shall be twelve (12) and readings shall be reduced to three (3) minute averages. *[Origin: 93NOC508, condition #5 (as revised 3/10/1999)]* *[Authority: WAC 173-401-600(1)(c)]*	Wellons Boiler	M1 M2
2.3	**Voluntary PM Emissions Rate Limit for Wellons Boiler:** Particulate emissions from the Wellons Boiler , including both filterable and condensable particulate, shall not exceed 0.037 lbs/MMBtu. Compliance shall be determined using EPA Methods 1-5 and 202 every five years. Continuous compliance shall be verified indirectly by monitoring performance of the Electrostatic Precipitator (ESP) and opacity from the ESP stack. *[Origin: 19NOR1326, condition 7d (5/12/2021)]* *[Authority: WAC 173-401-600(1)(c)]*	Wellons Boiler	M7 M11 M12
2.4	**Wellons Boiler NSPS Particulate Limit:** a) Wellons Boiler particulate emissions shall not exceed 0.10 pounds per million Btu heat input. *[Origin: 40 CFR 60.43b(c)(1)]* b) This limit shall apply at all times except during periods of startup, shutdown or malfunction. *[Origin: 40 CFR 60.43b(g) and 60.46b(a)]* c) Compliance with this limit shall be determined through performance testing according to conditions M11 and M12. [Origin: 40 CFR 60.46b(b)] d) For purposes of this limit, malfunction means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions. *[Origin: 40 CFR 60.2]*	Wellons Boiler	M7 M11 M12 M14

AR#	Requirements	Applicability	Monitoring
	e) The Reference Test Method for this limit is Method 5 at 40 CFR part 60, appendix A-3 or A-6. *[Origin: 40 CFR 60.46b(d)]* *[Origin: listed by sub-condition]* *[Authority: WAC 173-401-600(1)(a)]*		
2.5	**Boiler MACT Filterable PM Emission Limit - Wellons Boiler:** a) Filterable PM emissions from the Wellons Boiler must not exceed 2.0E-02 lb/MMBtu of heat input. *[Origin: 40 CFR 63.7500(a)(1), and Table 2 to Subpart DDDDD of Part 63]* b) This limit applies at all times the Wellons Boiler operates, except during periods of startup and shutdown during which time the Wellons Boiler must comply with the requirements in condition AR13. *[Origin: 40 CFR 63.7500(f), and 63.7505(a)]* c) The Permittee must demonstrate compliance with this limit using performance stack testing according to conditions M11 and M12. *[Origin: 40 CFR 63.7505(c), and 63.7540(a)]* d) The Reference Test Method for this limit is Method 5 or 17 at 40 CFR part 60, appendix A-3 or A-6. *[Origin: Table 5 to Subpart DDDDD of Part 63]* *[Origin: listed by sub-condition]* *[Authority: WAC 173-401-600(1)(a); and, and WAC 173-401-605(1)]*	Wellons Boiler	M7 M10 M11 M12 M14
2.6	**Wellons Boiler BACT Grain Loading Standard**. Wellons Boiler particulate emissions discharge to the atmosphere shall not exceed 0.04 grains per dry standard cubic foot of air corrected to 7% oxygen as determined by EPA Reference Method 5 from 40 CFR Part 60, Appendix A, and Method 202 from 40 CFR Part 51, Appendix M, including the back-half catch, as specified in 40 CFR Part 60, Appendix A. *[Origin: 93NOC508, condition #4 (as revised 3/10/1999)]* *[Authority: WAC 173-401-600(1)(c)]*	Wellons Boiler	M7 M9 M11 M12
2.7	**Boiler MACT CO Emission Limit - Wellons Boiler:** a) CO emissions from the Wellons Boiler must not exceed 1,100 ppm by volume on a dry basis corrected to 3 percent oxygen. *[Origin: 40 CFR 63.7500(a)(1), and Table 2 to Subpart DDDDD of Part 63]* b) This limit applies at all times the Wellons Boiler operates, except during periods of startup and shutdown during which time the Wellons Boiler must comply with the requirements in condition AR13. *[Origin: 40 CFR 63.7500(f)]* c) The Permittee must demonstrate compliance with this limit by operating a CO CEMS according to condition M8. *[Origin: 40 CFR 63.7505(c), and 63.7540(a)(8)*] d) The Reference Test Method for this limit is Method 10 at 40 CFR part 60, appendix A-4. Use a measurement span value of 2 times the concentration of the applicable emission limit. *[Origin: Table 5 to Subpart DDDDD of Part 63]*	Wellons Boiler	M8 M13 M14

AR#	Requirements	Applicability	Monitoring
	[Origin: listed by sub-condition] *[Authority: WAC 173-401-600(1)(a); and, and WAC 173-401-605(1)]*		
2.8	**Boiler MACT HCl Emission Limit - Wellons Boiler:** a) HCl emissions from the Wellons Boiler must not exceed the following limits: i) 2.2E-02 lb/MMBtu of heat input; or, ii) 2.5E-02 lb/MMBtu of steam output. *[Origin: 40 CFR 63.7500(a)(1), and Table 2 to Subpart DDDDD of Part 63]* b) These limits apply at all times the Wellons Boiler operates, except during periods of startup and shutdown during which time the Wellons Boiler must comply with the requirements in condition AR13. *[Origin: 40 CFR 63.7500(f), and 63.7505(a)]* c) The Permittee must demonstrate compliance with these emission limits using performance stack testing according to conditions M11 and M12. *[Origin: 40 CFR 63.7505 (c), and 63.7540(a)]* d) The Reference Test Method for this limit is Method 26A (M26A) at 40 CFR part 60, appendix A-8. *[Origin: Table 5 to Subpart DDDDD of Part 63]* *[Origin: listed by sub-condition]* *[Authority: WAC 173-401-600(1)(a); and WAC 173-401-605(1)]*	Wellons Boiler	M7 M10 M11 M12 M14
2.9	**Boiler MACT Mercury Emission Limit - Wellons Boiler:** a) Mercury emissions from EU1 must not exceed the following limits: i) 5.7E-06 lb/MMBtu of heat input; or, ii) 6.4E-6 lb/MMBtu of steam output. *[Origin: 40 CFR 63.7500(a)(1), and Table 2 to Subpart DDDDD of Part 63]* b) These limits apply at all times the Wellons Boiler operates, except during periods of startup and shutdown during which time the Wellons Boiler must comply with the requirements in condition AR13. *[Origin: 40 CFR 63.7500(f), and 63.7505(a)]* c) The Permittee must demonstrate compliance with these emission limits using performance stack testing according to conditions M11 and M12. *[Origin: 40 CFR 63.7505(c), and 63.7540(a)]* d) The Reference Test Method for this limit is Method 29 (M29) at 40 CFR part 60. *[Origin: Table 5 to Subpart DDDDD of Part 63]* *[Origin: listed by sub-condition]* *[Authority: WAC 173-401-600(1)(a) and WAC 173-401-605(1)]*	Wellons Boiler	M7 M10 M11 M12 M14
2.10	**General Duty Requirements:** a) All air contaminant sources are required to keep any process and/or air pollution control equipment in good operating condition and repair. *[Origin: ORCAA 8.8 (local only)]* b) At all times, including periods of startup, shutdown, and malfunction, the permittee shall maintain and operate the Wellons Boiler and associated air pollution control equipment in a manner consistent with good air	Wellons Boiler	M14

AR#	Requirements	Applicability	Monitoring
	pollution control practice for minimizing emissions. *[Origin: 40 CFR 60.11(d)]* c) At all times, the Permittee must operate and maintain the Wellons Boiler, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. *[Origin: 40 CFR 63.7500(a)(3)]* *[Origin: listed by sub-condition]* *[Authority: WAC 173-401-600(1)(a), and (b)]*		
2.11	**Boiler MACT Operating Limits - Wellons Boiler:** a) The Permittee must maintain the following operating limits except during periods of startup and shutdown of the Wellons Boiler: 1) Opacity to less than or equal to 10 percent opacity or the highest hourly average opacity reading measured during the performance test run demonstrating compliance with the PM limit in condition AR2.5 (daily block average); and, 2) 30-day rolling average operating load of the boiler such that it does not exceed 110 percent of the highest hourly average operating load recorded during the performance test demonstrating compliance with the limits in conditions AR2.5, AR2.8 and AR2.9. *[Origin: 40 CFR 63.7500(a)(2), 63.7500(f), 63.7505(a), and Table 4 to Subpart DDDDD of Part 63]* b) Operation of the Wellons Boiler above the established maximum or below the established minimum operating limits of this condition shall constitute a deviation of established operating limits except during performance tests conducted to determine compliance with the emission limits in conditions AR2.5, AR2.8 and AR2.9, or to establish new operating limits. *[Origin: 40 CFR 63.7540(a)(1)]* c) The operating limits of this condition must be confirmed and reestablished during performance tests according to condition 2.12. *[Origin: 40 CFR 7540(a)(1)]* d) The Permittee must demonstrate continuous compliance with each operating limit of this condition based on monitoring according to conditions M7 and M10. *[Origin: 40 CFR 63.7540(a), and Table 8 to Subpart DDDDD of Part 63]* *[Origin: listed by sub-condition]* *[Authority: WAC 173-401-600(1)(a) and WAC 173-401-605(1)]*	Wellons Boiler	M7 M10
2.12	**Establishing Boiler MACT Operating Limits - Wellons Boiler:** Boiler MACT operating limits for the Wellons Boiler must be established and reestablished during any performance testing required by conditions M11 and M12 as follows: a) Establish a site-specific maximum opacity level using data from the opacity monitoring system during the PM performance test as follows:	Wellons Boiler	M10 M11

AR#	Requirements	Applicability	Monitoring
	i) Collect opacity readings every 15 minutes during the entire period of the performance tests. ii) Determine the average hourly opacity reading for each performance test run by computing the hourly averages using all of the 15-minute readings taken during each performance test run. iii) Determine the highest hourly average opacity reading measured during the test run demonstrating compliance with the PM emission limitation of condition AR2.5. b) Establish a specific limit for maximum operating load for the Wellons Boiler using data from the operating load monitors or from steam generation monitors as follows: i) Collect operating load or steam generation data every 15 minutes during the entire period of the performance test. ii) Determine the average operating load by computing the hourly averages using all of the 15-minute readings taken during each performance test. iii) Determine the highest hourly average of the three test run averages during the performance test and multiply this by 1.1 (110 percent) as the operating limit. *[Origin: 40 CFR 63.7510(a)(3), 63.7530(b), and Table 7 to Subpart DDDDD of Part 63]* *[Authority: WAC 173-401-600(1)(a) and WAC 173-401-605(1)]*		
2.13	**Boiler MACT Requirements for Startup and Shutdown - Wellons Boiler :** a) Startup means The period in which operation of a boiler or process heater is initiated for any purpose. Startup begins with either the first-ever firing of fuel in a boiler or process heater for the purpose of supplying useful thermal energy (such as steam or heat) for heating, cooling or process purposes, or producing electricity, or the firing of fuel in a boiler or process heater for any purpose after a shutdown event. Startup ends four hours after when the boiler or process heater supplies useful thermal energy (such as heat or steam) for heating, cooling, or process purposes, or generates electricity, whichever is earlier. b) Shutdown means the period in which cessation of operation of a boiler or process heater is initiated for any purpose. Shutdown begins when the boiler or process heater no longer supplies useful thermal energy (such as heat or steam) for heating, cooling, or process purposes and/or generates electricity or when no fuel is being fed to the boiler or process heater, whichever is earlier. Shutdown ends when the boiler or process heater no longer supplies useful thermal energy (such as steam or heat) for heating, cooling, or process purposes and/or generates electricity, and no fuel is being combusted in the boiler or process heater. c) Only clean, dry biomass or "clean fuels" allowed for startup per Table 3 to Subpart DDDDD of Part 63 must be used to startup the Wellons Boiler. Clean fuels include natural gas, synthetic natural gas, propane, other Gas	Wellons Boiler	M14 RK3

AR#	Requirements	Applicability	Monitoring
	1 fuels, distillate oil, syngas, ultra-low sulfur diesel, fuel oil-soaked rags, kerosene, hydrogen, paper, cardboard, refinery gas, liquefied petroleum gas, clean dry biomass, and any fuels meeting the appropriate HCl, mercury and TSM emission standards by fuel analysis. d) Wellons Boiler continuous monitoring systems (CMS) must be operated during startup and shutdown. e) During periods of startup and shutdown, the Permittee must collect monitoring data, keep records and provide reports concerning activities and periods of startup as required by this permit. *[Origin: 40 CFR 63.7575, 63.7540(d), and Table 3 to Subpart DDDDD of Part 63]* *[Authority: WAC 173-401-600(1)(a) and WAC 173-401-605(1)]*		
2.14	**Boiler MACT Tune-up Requirement - Wellons Boiler:** The permittee shall perform tune-ups of the Wellons Boiler every 5 years as specified in §63.7540 of 40 CFR Part 63. *[Origin: 40 CFR 63.7500(a)(1) and Table 3 to Subpart DDDDD of Part 63]* *[Authority: WAC 173-401-600(1)(a) and WAC 173-401-605(1)]*	Wellons Boiler	RK3
2.15	**Wellons Boiler ESP Operations & Maintenance Plan.** The Permittee shall implement an ESP operation and maintenance (O&M) plan consistent with manufacturer recommendations and good engineering practice. Air pollution control equipment and associated gauges and monitors necessary to verify performance of the ESP shall be maintained and operated according to the plan. The O&M plan shall be kept in a binder on site in a location near the Wellons Boiler. Maintenance logs for recommended periodic and unscheduled maintenance shall be kept and made available for inspection upon request. Updates to the O&M plan shall be forwarded to ORCAA for approval at least 10 days prior to implementing the changes. *[Origin: 93NOC508, condition #9 (as revised 3/10/1999)]* *[Authority: WAC 173-401-600(1)(c)]*	Wellons Boiler	M6 RK3
2.16	**Wellons Boiler - Site Specific Part 63 Compliance Monitoring Plan.** The permittee shall develop a site specific monitoring plan according to the requirements of §63.7505(d) for the use of all continuous monitoring systems used to demonstrate compliance with the Part 63 emission limits. The site-specific monitoring plan shall be retained on site and made available to the ORCAA upon request. *[Origin: 40 CFR 63, §63.7505(d); 93NOC508, condition #13 (as revised 3/10/1999)]* *[Authority: WAC 173-401-615(1)(a)&(c)]*	Wellons Boiler	RK3
2.17	**Wellons Boiler Wood Fuel Requirements:** The Permittee shall burn only clean woody biomass in the Wellons Boiler. Clean woody biomass, also known as hog fuel or hogged fuel, is defined as any woody material that meets the	Wellons Boiler	M14

AR#	Requirements	Applicability	Monitoring
	definition of clean cellulosic biomass in §241.2 of 40 CFR Part 241, Subpart A (§241.2). Recycled wood-derived fuel is defined as any woody, non-hazardous secondary material that has been declared non-waste by the standards and procedures outlined in §241.3 of 40 CFR Part 241. *[Origin: N/A - gap filling monitoring]* *[Authority: WAC 173-401-615(1)(b)]*		
2.18	**Wellons Boiler Wood Fuel Quality Assurance Plan:** Recycled wood-derived fuel or fuels combusted in the Wellons boiler shall meet quality assurance standards of an approved Wood Fuel Quality Assurance Plan. The plan shall be approved by ORCAA prior to combusting any recycled wood-derived fuel. *[Origin: N/A - gap filling monitoring]* *[Authority: WAC 173-401-615(1)(b)]*	Wellons Boiler	RK3 M14
Applicable Requirements for Backup Boiler (EU2)			
N/A	**Classification under 40 CFR Part 63, Subpart DDDDD:** For purposes of regulation under 40 CFR Part 63, Subpart DDDDD, the Backup Boiler is classified under the "Units designed to burn gas 1 fuels" subcategory of boilers.	Backup Boiler	N/A
3.1	**Voluntary Limit for Backup Boiler:** The Backup Boiler shall operate as a back-up to the Wellons boiler (EU1) only and shall not operate in parallel with the Wellons boiler to provide steam to the mill. *[Origin: 19NOR1326, condition 7c (5/12/2021)]* *[Authority: WAC 173-401-600(1)(c)]*	Back-up Boiler	M14
3.2	**Boiler MACT Tune-up Requirement – Backup Boiler:** The permittee shall perform tune-ups of the Backup Boiler every 5 years as specified in §63.7540 of 40 CFR Part 63. *[Origin: 40 CFR 63.7500(a)(1) and Table 3 to Subpart DDDDD of Part 63]* *[Authority: WAC 173-401-600(1)(a) and WAC 173-401-605(1)]*	Back-up Boiler	RK3
3.3	**Part 63 Requirement to Maintain Proper Operation:** The permittee shall operate and maintain the Back-up Boiler, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. *[Origin: 40 CFR Part 63, Subpart DDDDD: §63.7500(a)(3); §63.7500(f)]* *[Authority: WAC 173-401-600(1)(c)]*	Back-up Boiler	M14
Applicable Requirements for Lumber Mill (EU4), Dry Kilns (EU5), Residuals Systems (EU6), Log Yard (EU7) and Anti-Mold System (EU8			
4.1	**Lumber Mill Operations (EU4):** Lumber milling and planing equipment including log de-barkers, hogs, chippers, saws and planers shall be sufficiently		M1 M2

AR#	Requirements	Applicability	Monitoring
	enclosed and controlled to prevent visible airborne dust that persists beyond the enclosure or building housing the equipment. *[Origin: 19NOR1326, condition 2 (5/12/2021)]* *[Authority: WAC 173-401-600(1)(c)]*	Lumber Mill Operations	M4
4.2	**Lumber Dry Kilns (EU5):** The following conditions apply to all lumber dry kilns: a) Dry kiln dry-bulb set point temperature must not exceed 200 F°. b) Drying temperatures must be maintained at 200 F° or less on a daily average basis. c) Drying temperature shall be continuously monitored and recorded. d) Temperature sensors shall be maintained and positioned to accurately monitor drying temperatures. *[Origin: 19NOR1326, condition 4 (5/12/2021)]* *[Authority: WAC 173-401-600(1)(c)]*	Lumber Dry Kilns	M6
4.3	**Voluntary Limits for Lumber Dry Kilns:** Dried lumber production shall not exceed 500 million board feet (MMbf) over any 12-consecutive-month period. *[Origin: 19NOR1326, condition 7b (5/12/2021)]* *[Authority: WAC 173-401-600(1)(c)]*	Lumber Dry Kilns	M6
4.4	**Wood Residuals Handling Systems (EU6):** All cyclones shall exhaust to fabric filter baghouses. *[Origin: 19NOR1326, condition 3a (5/12/2021)]* *[Authority: WAC 173-401-600(1)(c)]*	Residuals Systems	none
4.5	**Wood Residuals Handling Systems (EU6) -** Baghouse particulate emissions limit: a) Particulate emissions from baghouses shall not exceed 0.002 grains per dry standard cubic foot of exhaust air on an hourly average basis (gr/dscf, 1-hr ave). b) Baghouse performance shall be documented through any of the following means: i) Site specific testing in accordance with EPA Method 5; ii) Testing performed on a similar unit; or, iii) Engineering calculations based on the filtering efficiency of the specific bags used. c) Baghouse performance shall be maintained by: i) Assuring and documenting bag filtering efficiency; ii) Periodically inspecting the baghouse and bags for leaks; iii) Monitoring pressure drop across the baghouse; and, iv) Maintaining pressure drop less than 4-inches of water column. *[Origins: 19NOR1326, condition 3b-d (5/12/2021); 18NOC1291, condition 2 & 3 (7/17/2018)]*	Residuals Systems	M1 M2 M6 RK3

AR#	Requirements	Applicability	Monitoring
	[Authority: WAC 173-401-600(1)(c)]		
4.6	**Wood Residuals Handling Systems (EU6) -** Requirements for wood residuals transport conveyors: a) Conveyors used to transport wood residuals containing particulate (sawdust, chipped wood, hog fuel, planer shavings, and wood dust) shall be completely enclosed, except for portions of the system where materials are not transported such as return belts. b) Material drop points along the enclosed wood residuals conveyor system shall be enclosed or shrouded. *[Origin: 19NOR1326, condition 3e-f (5/12/2021)]* *[Authority: WAC 173-401-600(1)(c)]*	Residuals Systems	none
4.7	**Wood Residuals Handling Systems (EU6):** Precautions and preventative maintenance shall be taken as appropriate to prevent visible fugitive emissions from operation of wood residual bins that are part of the enclosed wood residuals conveyor system. *[Origin: 19NOR1326, condition 3g (5/12/2021)]* *[Authority: WAC 173-401-600(1)(c)]*	Residuals Systems	M1 M2 M4
4.8	**Wood Residuals Handling Systems (EU6):** Truck and rail loading operations shall be enclosed or shrouded sufficiently to prevent visible airborne dust that persists beyond the Mill boundary. *[Origin: 19NOR1326, condition 3h (5/12/2021)]* *[Authority: WAC 173-401-600(1)(c)]*	Residuals Systems	M1 M2 M4
4.9	**Wood Residuals Handling Systems (EU6):** Wood residual piles shall be enclosed sufficiently to prevent windblown dust. *[Origin: 19NOR1326, condition 3i (5/12/2021)]* *[Authority: WAC 173-401-600(1)(c)]*	Residuals Systems	M1 M2 M4
4.10	**Wood Residuals Handling Systems (EU6) –** Visible emissions from baghouses shall not exceed 5% opacity for more than three minutes in any one hour. Reference Test Method: EPA method 9. *[Origin: 19NOR1326, condition 3j (5/12/2021)]* *[Authority: WAC 173-401-600(1)(c)]*	Residuals Systems	M1 M2
4.11	**Wood Residuals Handling Systems (EU6) –** Visible fugitive dust from EU6 shall not exceed 10% opacity for more than 3 minutes in any one hour. Reference Test Method: EPA Method 9. *[Origin: 19NOR1326, condition 3k (5/12/2021)]* *[Authority: WAC 173-401-600(1)(c)]*	Residuals Systems	M1 M2 M4

AR#	Requirements	Applicability	Monitoring
4.12	**Log Yard (EU7):** The log yard shall be paved and periodically cleaned to prevent visible airborne dust that persists beyond the Mill property line. *[Origin: 19NOR1326, condition 5 (5/12/2021)]* *[Authority: WAC 173-401-600(1)(c)]*	Log yard	M1 M2 M4
4.13	**Anti-Mold System (EU8):** The following conditions apply to the anti-mold systems: a) The anti-mold system shall be enclosed and equipped with a mist eliminator. b) The anti-mold system is approved for applying the following solutions or other solutions with identical formulations: i) Workhorse® III; ii) IronFixT™ 1002; iii) Sawmill Penetrator A20; and, iv) Antifoam Agent 30. c) Use of any other formulation that results in a new TAP or HAP or that increase emissions requires prior approval by ORCAA. *[Origin: 19NOR1326, condition 6 (5/12/2021)]* *[Authority: WAC 173-401-600(1)(c)]*	Anti-Stain/Mold System	RK3
4.14	**Saw Filing and Fab-Shop Baghouses:** The saw filing and fabrication shop baghouses shall be operated whenever operations in the respective areas they serve generate emissions. *[Origin: 18NOR1291, condition 3 (7/17/2018)]* *[Authority: WAC 173-401-600(1)(c)]*	Saw Filing and Fabrication Shop baghouses	M4
4.15	**Spray Coating of "End Shield" (IEU14)-** The Permittee must assure: a) The End Shield used has a VOC content of 0.35 lb/gallon or less; and, b) The amount of End Shield used per year must not exceed 4,000 gallons of product. *[Origin: 19NOI1320, conditions 1 & 2, (2/4/2019)]* *[Authority: WAC 173-401-600(1)(c)]*	IEU14 - Spray Coating of End Shield	RK3

[END OF SECTION]

VII. MONITORING TERMS AND CONDITIONS (M)

M1. Opacity Surveys. The Permittee shall conduct visual opacity surveys of the Mill during daylight hours at least weekly.

- **a)** Surveys shall be conducted from locations with a clear view of the Mill and where the sun is not directly in the observer's eyes. Survey locations shall be at least 15 feet but not more than 0.25 miles from each emission point.
- **b)** Surveys shall be conducted while the Mill is operating and when both steam and lumber are being produced.
- **c)** Observer certification for plume evaluation is not required to conduct the survey. However, it is necessary that the observer is educated on the general procedures for determining the presence of visible emissions. As a minimum, the observer must be trained and knowledgeable regarding the effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, observer position relative to source and sun, and the presence of uncombined water.
- **d)** The survey shall consist of a visual scan of the Mill and direct observation of all stacks to identify any visible emissions excluding water vapors.
- **e)** Each stack shall be observed for a total of at least 15 seconds during the survey.
- **f)** Any visible emissions other than uncombined water shall be recorded as a positive reading associated with the emission point or stack.
- **g)** If it is not possible to conduct the survey due to inclement weather conditions, the Permittee shall make three attempts during the day to conduct the survey. All attempts to conduct the survey shall be recorded in accordance with condition RK3.

[Origin: N/A - gap filling monitoring]
[Authority: WAC 173-401-615(1) (b)]

M2. Opacity Compliance Demonstration Required:

- **a)** When required by ORCAA, or when point or fugitive opacity is observed during surveys required under M1, other than visible emissions due to uncombined water, the Permittee shall:
  - **i)** For emissions from stacks or points, complete a Reference Method Opacity Test of any emissions stack or point exhibiting opacity in accordance with condition M2b; or,
  - **ii)** For fugitive emissions, determine and document that reasonable and/or appropriate precautions are being taken to prevent the fugitive emissions. The determination shall be completed within 24 hours of the opacity survey.
- **b)** **Opacity Reference Method Test Procedures.** When required, pursuant to condition M2a, the Permittee shall conduct a Reference Method Opacity Test consistent with the applicable opacity reference test methods as follows:
  - **i)** Certified opacity readings shall be completed within 1 hour of the opacity survey that initially triggered the reference test method readings unless the subject

emission unit is not operating, or lack of daylight or weather conditions prevent conducting the testing;

ii) A Visible Emissions Observation Form (provided in Attachment 2) must be completed for each required Reference Method Opacity Test;

iii) Certified opacity readings shall be performed by persons with current EPA Method 9 certification in plume evaluation;

iv) All certified opacity readings shall be performed during periods when the subject emissions unit is operating;

v) If the subject emissions unit is down for maintenance or not operating, the Permittee shall commence compliance verification within one hour after the unit comes back on line;

vi) If it is not possible to perform certified opacity readings due to inclement weather conditions or lack of daylight, the Permittee shall document the conditions and shall make repeated daily attempts to conduct the testing until it is accomplished;

vii) Opacity shall be computed from visual observations consistent with the Reference Test Methods of each applicable opacity limit;

viii) For both reference test methods, the minimum duration for certified readings shall not be less than 12 minutes;

ix) For Ecology Method 9A:

(1) If any individual reading made at 15-second intervals is higher than 20% opacity, certified readings must be conducted for a full 60 minutes or until readings indicate the general 20% opacity standard was exceeded; and,

(2) The opacity standard is exceeded if there are more than 12 individual readings, during any consecutive 60-minute period, for which an opacity greater than the standard is recorded; and,

x) For EPA Method 9, the opacity standard is exceeded if the average of 24 consecutive observations recorded at 15-second intervals is greater than the standard.

[Origin: N/A - gap filling monitoring]
[Authority: WAC 173-401-615(1) (b)]

M3. Monitoring Air Impacts Detrimental or a Nuisance to Persons or Property. The Permittee shall monitor all air quality related complaints directed to the Mill as follows:

a) The Permittee shall provide an automatic phone recording system or an onsite contact person available to the general public for filing a complaint whenever the Mill is operating.

b) The Permittee shall monitor complaints received in a timely manner by investigating and assessing the validity of each complaint, and documenting the complaint in accordance with RK8.

[Origin: N/A - gap filling monitoring]
[Authority: WAC 173-401-615(1) (b)]

M4. Fugitive Emissions, Odors and Dust Control Monitoring. The Permittee shall monitor operations to assess whether reasonable and appropriate precautions for preventing fugitive

emissions, including odors, and fugitive dust are practiced throughout the Mill. Monitoring shall consist of a monthly audit of operations with the potential for fugitive emissions, odors or dust. The audit shall cover, but shall not be limited to, the reasonable and appropriate practices identified in Table M1.

TABLE M1: Monitoring Reasonable and Appropriate Precautions for Preventing Fugitive Emissions and Dust

Area or EU	Reasonable and Appropriate Precautions
Wellons Boiler (EU1)	1. Adequately enclosing boiler ash collection piles and bins to prevent boiler ash becoming airborne. 2. Transferring and loading ash in a manner that does not result in visible airborne ash. 3. Transporting ash in enclosed containers or trailers adequately covered so as to prevent visible airborne dust.
Lumber Mill Operations (EU4)	Lumber milling and planing equipment including log de-barkers, hogs, chippers, saws and planers shall be sufficiently enclosed and controlled to prevent visible airborne dust that persists beyond the enclosure or building housing the equipment.
Wood Residuals Handling Systems (EU6)	1. All cyclones shall exhaust to fabric filter baghouses. 2. Conveyors used to transport wood residuals containing particulate (sawdust, chipped wood, hog fuel, planer shavings, and wood dust) shall be completely enclosed, except for portions of the system where materials are not transported such as return belts. 3. Material drop points along the enclosed wood residuals conveyor system shall be enclosed or shrouded. 4. Wood residual bins that are part of the enclosed conveyor system shall vent either through fabric filters or cyclones that exhaust to baghouses. 5. Truck and rail loading operations shall be enclosed or shrouded sufficiently to prevent visible airborne dust that persists beyond the Mill boundary. 6. Wood residual piles shall be managed by means to prevent material from becoming airborne.
Log Yard (EU7)	1. The log yard areas shall be paved 2. The log yard shall be periodically cleaned to prevent visible airborne dust that persists beyond the Mill property-line.
Anti-Mold System (EU8)	Mist eliminator and system to recycle anti-mold solutions used.

[Origin: N/A - gap filling monitoring]
[Authority: WAC 173-401-615(1) (b)]

M5. Sulfur Dioxide Emissions Monitoring. When required, SO_2 emissions rates shall be determined via mass-balance calculation methods using the average percent by weight of sulfur in the fuel combusted, the actual amount of fuel combusted, and assuming all sulfur is converted to SO_2. The following fuel-specific monitoring is required:

TABLE M2: Fuel-Specific Sulfur Monitoring

Approved Fuel Type	Required Monitoring
#2 Fuel Oil	The Permittee shall verify via fuel certifications, SDS or written contract with the #2 fuel oil supplier the sulfur content of the fuel purchased and that it was 0.5% sulfur by weight or less.
Diesel	The Permittee shall verify via fuel certifications, SDS or written contract with the diesel supplier that the sulfur content of the fuel purchased was 0.0015% sulfur or less.

Wood Derived Fuels	Per condition M14

[Origin: N/A - gap filling monitoring]
[Authority: WAC 173-401-615(1) (b)]

M6. Periodic Monitoring. The permittee shall monitor the Wellons Boiler Electrostatic Precipitator (ESP), Lumber Dry Kilns (EU5) and Wood Residuals Handling Systems (EU6) as specified in Table M3 below. The permittee is temporarily exempted from a monitoring requirement of this condition during periods when:

a) The monitoring equipment is inoperable due to a malfunction of the monitoring equipment, provided the permittee demonstrates to the satisfaction of ORCAA that the malfunction was unavoidable and was being repaired as expeditiously as practicable; or,

b) The associated emissions unit is not operating, provided the permittee keeps a contemporaneous record of when the emissions unit is not operating.

TABLE M3: Operating Requirements for Pollution Control Equipment

EU#	Required Operating Condition	Required Monitoring
EU1: Wellons Boiler	ESP secondary power parameters are maintained according to the Permittee's ESP operations and maintenance plan (condition 2.15).	Continuously monitor secondary voltage and current in each field of the ESP.
EU5: Lumber Dry Kilns	Drying temperatures must be maintained at 200°F or less on a daily average basis (when the kiln is actively drying). This condition may be demonstrated using continuous kiln drying temperature records when either: • Drying temperatures are maintained less than 200°F over the entire drying cycle; or, • Visual approximation of the average temperature over the entire drying cycle can be determined less than 200°F.	a. Continuously monitor kiln drying temperatures. b. Monitor and record the dry kiln dry-bulb set point temperature over the entire drying cycle for each batch. c. Temperature sensors must be maintained and positioned to accurately monitor drying temperatures. d.
EU6 Baghouses	No baghouse leaks.	Weekly inspect all baghouses for leaks
	Maintain pressure drop within recommended range	Weekly check pressure drop across all baghouses

[Origin: 19NOR1326, condition 4 (5/12/2021)]
[Authority: WAC 173-401-615(1)(a)]

M7. Wellons Boiler Continuous Opacity Monitoring System: The Permittee shall install, calibrate, maintain, and operate a continuous opacity monitoring system (COMS) for measuring the opacity of emissions discharged to the atmosphere from the Wellons Boiler and record the output of the system as follows:

a) **Location and Certification:** The COMS shall be situated at the ESP outlet and shall be certified pursuant to Performance Specification 1 of 40 CFR Part 60, Appendix B. *[Origin: 40 CFR § 63.7525(c)]*

b) **COMS Specifications:**

i) Performance Specifications. The COMS must be installed, operated, and maintained according to Performance Specification 1 (PS1) at appendix B to of 40 CFR Part 60. *[Origin: 40 CFR § 60.13(a); 40 CFR § 63.7525(c)(1)]*

ii) Visual Readout. The COMS read out (that component of the COMS that provides a visual display or record) must be readily accessible on site for operational control or inspection by the operator of the equipment. *[Origin: 40 CFR § 63.8(c)(2)(ii)]*

c) **Operational Requirements:**

i) Sampling Frequency. Except as provided in sub-condition (c)(ii) below, the COMS shall be in continuous operation and shall complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one cycle of data recording for each successive 6-minute period. *[Origin: 40 CFR § 60.13(e); 40 CFR § 63.7525(c)(3)]*

ii) Exceptions. The COMS must operate and collect data at all required intervals at all times the boiler is operating, except for periods of COMS malfunctions or out of control periods, and required monitoring system quality assurance or control activities, including, as applicable, calibration checks, required zero and span adjustments, and scheduled COMS maintenance. *[Origin: 40 CFR § 63.7535(b)]*

iii) Automated Daily Check of Zero and Span Calibration Drifts. The COMS must automatically, intrinsic to the opacity monitor, check the zero (between 0 percent and 16 percent opacity) and upscale (between 30 percent and 80 percent opacity) calibration drifts at least once daily. Daily is defined as any portion of a calendar day in which the unit operates. The optical surfaces must be cleaned when the cumulative automatic zero compensation exceeds 4 percent opacity. *[Origin: 40 CFR § 60.13(d)]*

iv) Span. The span value shall be between 60 and 80 percent. *[Origin: 40 CFR § 60.48b(e)(1)]*

v) Quality Assurance Procedures. The COMS shall be subject to the quality assurance procedures under Procedure 3 in appendix F of 40 CFR Part 60. *[Origin: 40 CFR § 60.13(a)]*

vi) Deviations General. Except for periods of monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required monitoring system quality assurance or quality control activities (including, as applicable, system accuracy audits, calibration checks, and required zero and span adjustments), failure to collect required data is a deviation of these monitoring requirements. *[Origin: 40 CFR § 63.7525(c)(6)]*

vii) Out of Control Periods:

(1) Any 6-minute period for which the monitoring system is out of control and data are not available for a required calculation constitutes a deviation from these monitoring requirements. *[Origin: 40 CFR § 63.7525(c)(6)]*

(2) Out-of-control periods mean that one or more COMS parameters falls outside of the acceptable limits established in Procedure 3 in appendix F of 40 CFR Part 60, including:

(a) Daily Assessments. Whenever calibration drift (CD) for either the zero or span calibration exceeds 4% opacity, the COMS is out-of-control. The beginning of the out-of-control period is the time corresponding to the completion of the daily calibration drift check. The end of the out-of-control period is the time corresponding to the completion of appropriate adjustment and subsequent successful CD assessment. *[Origin: Section 3.1(1) of Procedure 3 in appendix F of 40 CFR Part 60]*

(b) **Quarterly and Annual Assessments.** Whenever an annual zero alignment or quarterly performance audit fails to meet the criteria established in paragraphs (2) and (3) of section 10.4 of Procedure 3 in appendix F of 40 CFR Part 60, the COMS is out-of-control. The beginning of the out-of-control period is the time corresponding to the completion of the performance audit indicating the failure to meet these established criteria. The end of the out-of-control period is the time corresponding to the completion of appropriate corrective actions and the subsequent successful audit (or, if applicable, partial audit). *[Origin: Section 3.1(2) of Procedure 3 in appendix F of 40 CFR Part 60]*

viii) Reporting Out-of-Control Periods. Periods the COMS was out of control including any periods that the COMS failed to pass a daily calibration drift assessment, a quarterly performance audit, or an annual zero alignment audit must be identified in quarterly or semiannual monitoring reports. *[Origin: 40 CFR § 63.7525(c)(6); 40 CFR § 63.7535(c); 40 CFR § 63.7535(d)]*

d) **Maintenance:**

i) Maintenance. The Permittee is required to complete COMS repairs in response to malfunctions or out-of-control periods and to return the COMS to operation as expeditiously as practicable. A COMS malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. COMS system failures that are caused in part by poor maintenance or careless operation are not malfunctions. *[Origin: 40 CFR § 63.7535(b)]*

ii) Spare Parts. The owner or operator must keep the necessary parts for routine repairs of the affected CMS equipment readily available. *[Origin: 40 CFR § 63.8(c)(1)(ii)]*

iii) Replacements. The Permittee shall conduct a Field Audit Performance Test of any COMS in accordance with PS1 after replacing the COMS and at such other times as may be required by ORCAA. *[Origin: 40 CFR § 60.13(c)]*

e) **Data Reduction and Recording:**

i) 6-minute averages. COMS data shall be reduced to 6-minute averages calculated from 36 or more data points equally spaced over each 6-minute period. *[Origin: 40 CFR § 60.13(h); 40 CFR § 63.8(g)(2)]*

ii) Daily block averages. COMS data shall be reduced to daily block averages. *[Origin: 40 CFR § 63.7525(c)(7)]*

iii) Data Recording. The averages described in (e)(i) through (ii) above must be determined and recorded for all periods during which the COMS is not out of control. *[Origin: 40 CFR § 63.7525(c)(7)]*

iv) Data Recording. The data may be recorded in reduced or nonreduced form. *[Origin: 40 CFR § 63.8(g)(3)]*

v) Data Conversion and Rounding. All emission data shall be converted into the averages required in (e)(i) and (e)(ii) above and daily block averages for reporting purposes. After conversion into required averages, the data may be rounded to the nearest 1 percent opacity. *[Origin: 40 CFR § 63.8(g)(4)]*

vi) Data Exclusions:

(1) **General.** For purposes of monitoring compliance with all opacity limits, data recorded during periods of unavoidable COMS breakdowns, out-of-control periods, repairs, maintenance periods, calibration checks, and zero (low-level) and high-level adjustments must not be included in any data averages. *[Origin: 40 CFR § 63.8(g)(5)]*

(2) **Startup and Shutdown.** Data recorded during periods startup and shutdown must:

(a) Not be included in any data averages used for monitoring compliance with the Subpart Db opacity limit in condition AR2.1, and the Boiler MACT opacity operating limit in condition AR2.11. *[Origin: 40 CFR § 63.7535(c)]*

(b) Be considered for monitoring compliance with the Washington and ORCAA general opacity limits in conditions AR1.1 and AR1.2, respectively. *[Origin: added provision]*

f) **Compliance Evaluations:**

i) Compliance with 6-minute average opacity limits using EPA Method 9 as the Reference Test Method shall be evaluated by comparing with COMS data reduced according to sub-condition e(i) above. *[Origin:* added provisions*]*

ii) Compliance with the daily block average opacity operating condition shall be evaluated by comparing COMS data reduced according to sub-condition e(ii) above with the daily block average limit established per condition AR2.12. *[Origin: 40 CFR § 63.7525(c)(7)]*

iii) COMS data reduced according to sub-condition e(i) shall also be used as an indicator of compliance with opacity limits using Ecology Method 9A as the Reference Test Method. *[Origin: added provisions]*

[Origins: 40 CFR § 60.48b(a); 40 CFR § 63.7525(c); 93NOC508, condition #10 (as revised 3/10/1999); some added provisions]
[Authority: WAC 173-401-615(1)(a); WAC 173-401-615(1)(b); WAC 173-401-615(1)(c)]

M8. Wellons Boiler CO CEMS. The Permittee shall install, certify, operate and maintain continuous emission monitoring systems for CO (CO CEMS) and oxygen (O_2 CEMS), and monitor emissions of CO and O_2 during all periods of operation of the Wellons Boiler as follows:

a) Site Specific Monitoring Plan. Both CEMS must be operated and maintained according to the site-specific monitoring plan (SMP) required by condition AR2.16. *[Surrogate Origin: 40 CFR § 63.7505(d)(4)]*

b) Performance Specifications and Quality Assurance Procedures:

i) The Permittee must install, certify, operate, and maintain the CO CEMS according to the applicable procedures under Performance Specification 4, 4A, or 4B at 40 CFR part 60, appendix B and Procedure 1 at 40 CFR, Part 60, Appendix F, Quality Assurance Procedures. *[Surrogate Origin: 40 CFR § 63.7525(a)(2); 40 CFR § 63.7525(a)(2)(iii)]*

ii) The Permittee must install, certify, operate, and maintain the O_2 CEMS according to the applicable procedures under Performance Specification 3 at 40 CFR part 60, appendix B and Procedure 1 at 40 CFR, Part 60, Appendix F, Quality Assurance Procedures. *[Surrogate Origin: 40 CFR § 63.7525(a)(2); 40 CFR § 63.7525(a)(2)(iii)]*

c) CEMS Location. The CO and oxygen levels shall be monitored at the same location at the outlet of Wellons Boiler. *[Surrogate Origin: 40 CFR § 63.7525(a)(1)]*

d) Span. The measurement span value of the CO CEMS must be two times the applicable CO emission limit, expressed as a concentration, which, based on a 1,100 ppm CO limit is 2,200 ppm @ 3% oxygen. *[Surrogate Origin: 40 CFR § 63.7525(a)(2)(iii)]*

e) Required Operation. The Permittee must operate the CO CEMS and collect data at all required intervals at all times the Wellons Boiler is operating and compliance is required, except for periods of monitoring system malfunctions or out of control periods, and required monitoring system quality assurance or control activities, including, as applicable, calibration checks, required zero and span adjustments, and scheduled CEMS maintenance as defined in the written SMP required by condition AR2.16. A monitoring system malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring system failures that are caused in part by poor maintenance or careless operation are not malfunctions. Monitoring system repairs in response to monitoring system malfunctions or out-of-control periods and to return the monitoring system to operation are required to be completed as expeditiously as practicable. *[Surrogate Origin: 40 CFR § 63.7535(b)]*

f) Non-compliant CEMS. Any CO CEMS that does not comply with this condition cannot be used to meet any requirement to demonstrate compliance with any of the applicable CO emissions limits in this permit. *[Surrogate Origin: 40 CFR § 63.7525(a)(2)(iv)]*

g) Failure to Monitor a Deviation. Except for periods of monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required monitoring system quality assurance or quality control activities (including, as applicable, system accuracy audits, calibration checks, and required zero and span adjustments), failure to collect required data is a deviation of the monitoring requirements. *[Surrogate Origin: §63.7535(d)]*

h) **Daily Calibration.** The CO CEMS must automatically check the zero (or low level value between 0 and 20 percent of span value) and span (50 to 100 percent of span value) calibration drifts at least once each operating day in accordance with the written procedure in the SMP required by condition AR2.16. The zero and span must, at a minimum, be adjusted whenever either the 24-hour zero drift or the 24-hour span drift exceeds two times the limit of the applicable performance specification in appendix B of this part. *[Surrogate Origin: 40 CFR § 63.7525 (a)(2)(iii); 40 CFR § 60.13(d)(1); Procedure 1 at 40 CFR, Part 60, Appendix F, Quality Assurance Procedures]*

i) **CEMS Cycle Frequency.** The CO CEMS must complete a minimum of one cycle of CO and oxygen CEMS operation (sampling, analyzing, and data recording) for each successive 15-minute period. Collect CO and oxygen data concurrently. Collect at least four CO and oxygen CEMS data values representing the four 15-minute periods in an hour, or at least two 15-minute data values during an hour when CEMS calibration, quality assurance, or maintenance activities are being performed. *[Surrogate Origin: 40 CFR § 63.7525(3)]*

j) **CEMS Instrument Detection Level.** For purposes of determining compliance, CEMS measurements below the instrument detection level must use the instrument detection level in the algorithm used for determining CO emissions over the averaging period. *[Surrogate Origin: 40 CFR § 63.7520(f)]*

k) **Out of control periods.** The CO CEMS is out of control if:

- **i)** The zero (low-level) or high-level calibration drift (CD) of the CO measuring instrument exceeds 180 ppm (two times the applicable CD specification in the applicable performance specification);
- **ii)** CD of the O2 analyzer drifts by more than 0.5 percent O2 from the reference value of the gas, gas cell or optical filter; or,
- **iii)** The CEMS fails a performance test audit (e.g., cylinder gas audit), relative accuracy audit, relative accuracy test audit, or linearity test audit. *[Surrogate Origin: 40 CFR § 63.8(c)(7)(i)]*

l) **Corrective Actions.** When the CO CEMS is out of control, the Permittee shall take the necessary corrective action and shall repeat all necessary tests which indicate that the system is out of control. The Permittee shall take corrective action and conduct retesting until the performance requirements are below the applicable limits. The beginning of the out-of-control period is the hour the Permittee conducts a performance check (e.g., calibration drift) that indicates an exceedance of the performance requirements established under this condition. The end of the out-of-control period is the hour following the completion of corrective action and successful demonstration that the system is within the allowable limits. During the period the CO CEMS is out of control, recorded data shall not be used in data averages and calculations, or to meet any data availability requirement under this permit. *[Surrogate Origin: 40 CFR § 63.8(c)(7)(ii)]*

m) **Relative Accuracy Test Audit (RATA).** During each RATA test run of the CO CEMS, emission data for CO must be collected concurrently (or within a 30- to 60-minute period) by both the CO CEMS and by Method 10 at 40 CFR part 60, appendix A-4. The

relative accuracy testing must be at representative operating conditions. *[Surrogate Origin: 40 CFR § 63.7525(a)(2)(ii)]*

n) Performance Evaluations. The permittee must follow the quality assurance procedures (e.g., quarterly accuracy determinations and daily calibration drift tests) of Procedure 1 of appendix F to 40 CFR Part 60. *[Surrogate Origin: 40 CFR § 63.7525(a)(2)(i)]*

o) CEMS Data Conversions:

i) Data shall be reduced to 1-hour averages computed from four or more data points equally spaced over each 1-hour period, except during periods when calibration, quality assurance, or maintenance activities pursuant to provisions of this part are being performed. During these periods, a valid hourly average shall consist of at least two data points with each representing a 15-minute period. *[Surrogate Origin: 40 CFR § 63.7525(4); 40 CFR § 63.8(g)(2)]*

ii) Hourly average CO emissions shall be calculated in the following units for all periods of operation:

(1) Concentrations in terms of ppm, dry at 3% O2. *[Surrogate Origin: 40 CFR § 63.7525(5)]*

(2) Pollutant mass rates in terms of lbs/hour. [*Origin: added provisions]*

iii) Pollutant mass rates in terms of lbs/hr shall be calculated using stack gas flow data from the Flow CMS required in condition M9. The equations used for these calculations shall be described in the SMP. *[Origin:* added provisions*]*

iv) All raw data collected during all periods shall be used in calculating hourly averages, except data recorded during the following periods may be excluded:

(1) Monitoring system malfunctions or out-of-control periods;

(2) Repairs associated with monitoring system malfunctions or out-of-control periods; and,

(3) Required monitoring system quality assurance or control activities. *[Surrogate Origin: 40 CFR § 63.7525(a)(6); 40 CFR § 63.7535(c); 40 CFR § 63.7535(d)]*

[Origin: as specified per sub-condition; 93NOC508, condition #10 (as revised 3/10/1999)]
[Authority: WAC 173-401-630(1)]

M9. Stack Gas Flow Monitoring. The Permittee shall continuously monitor the volumetric flow of exhaust from the Wellons Boiler using a stack gas flow monitoring system (Flow CMS) during all periods of operation of the boiler. The Flow CMS shall meet Performance Specification 6 of 40 CFR Part 60, Appendix B, or alternative performance specifications as approved by ORCAA.
[Origin: N/A]
[Authority: "Gap-Filling Monitoring" per WAC 173-401-615(1)(b)]

M10. Boiler Operating Load. The Permittee shall operate and maintain a continuous steam monitoring system (Steam CMS) to monitor steam production by the Wellons Boiler in terms of lbs per hour of steam produced by the boiler as follows:

a) Operational Requirements:

i) The Steam CMS must operate and collect data at all times the Wellons Boiler is operating and compliance is required, except periods of monitoring system malfunctions and scheduled Steam CMS maintenance as defined in the Permittee's SMP required under condition AR2.16. A Steam CMS malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. *[Origin: 40 CFR § 63.7535(b)]*

ii) The Steam CMS must complete a minimum of one cycle of operation every 15-minutes and must have a minimum of four successive cycles of operation, one representing each of the four 15-minute periods in an hour, to have a valid hour of data. *[Origin: 40 CFR § 63.8(c)(4)(ii); 40 CFR § 63.7525(d)(1)]*

iii) Any 15-minute period for which the Steam CMS is required to operate and collect data and data are not available for a required calculation constitutes a deviation from this monitoring requirement. *[Origin: 40 CFR § 63.7525(d)(3)]*

iv) The Steam CMS must be operated and maintained according to the protocols adopted in the Permittee's SMP required by condition AR2.16. *[Origin: 40 CFR § 63.7505(d)(4)]*

b) Quality Assurance Requirements:

i) The Steam CMS must be calibrated prior to use. *[Origin: 40 CFR § 63.8(c)(6)]*

ii) The Permittee must conduct a performance evaluation of the Steam CMS in accordance with quality assurance and control protocols adopted by the Permittee in their SMP required by condition AR2.16. *[Origin: 40 CFR § 63.7505(d)(3)]*

c) O&M Records:

i) Steam production data must be recorded every 15-minutes when the Wellons Boiler is operating. *[Origin: Item 10 of Table 8 to 40 CFR Part 63 Subpart DDDDD]*

ii) The Permittee must record the results of each inspection, calibration, and validation check of the Steam CMS. *[Origin: 40 CFR § 63.7525(d)(5); WAC 173-401-615(1)(b)]*

d) Data Reduction:

i) The permittee shall calculate rolling 30-day average steam production for every hour the Wellons Boiler operates except periods specified in condition dii below. *[Origin: 40 CFR § 63.7525(d)(3)]*

ii) Steam CMS data recorded during periods of startup, shutdown, Steam CMS malfunctions, audits, and Steam CMS repairs may not be used in data averages and calculations used to evaluate compliance with the steam operating requirement. All data collected during all other periods must be used in assessing compliance. *[Origin: 40 CFR § 63.7535(c)]*

e) Compliance Evaluation. Compliance shall be evaluated by comparing the 30-day average steam production of the Wellons Boiler with the operating load limit established during performance testing as required by condition AR2.12. *[Origin: Item 10 of Table 8 to 40 CFR 63 Subpart DDDDD]*

[Origins: listed by sub-condition]
[Authority: WAC 173-401-615(1)(a); WAC 173-401-630(1)]

M11. Ongoing Performance Testing Requirements. The Permittee must conduct performance testing consistent with the procedures and methods in this condition and condition M12 whenever required by ORCAA and according to the following schedule:

- **a)** Performance testing for filterable PM, HCl and Hg emissions from EU1 must be completed at least annually and no more than 13 months after the previous performance testing, except as provided in (b) through (e) of this condition. *[Origin: 40 CFR 63.7515 (a)]*
- **b)** If Wellons Boiler performance testing for a given pollutant for at least 2 consecutive years shows that emissions are at or below 75 percent of the emission limit for the pollutant, and if there are no changes in the operation of the Wellons Boiler and associated air pollution control equipment that could increase emissions, The Permittee may choose to conduct performance tests for the pollutant every third year. Each such performance test must be conducted no more than 37 months after the previous performance test. *[Origin: 40 CFR 63.7515(b)]*
- **c)** If a performance test shows emissions exceeded the emission limit or 75 percent of the emission limit for a pollutant, the Permittee must conduct annual performance tests for that pollutant until all performance tests over a consecutive 2-year period are at or below 75 percent of the emission limit. *[Origin: 40 CFR 63.7515(c)]*
- **d)** If the Wellons Boiler has not operated since the previous compliance demonstration and more than one year has passed since the previous compliance demonstration, the Permittee must complete the subsequent compliance demonstration, no later than 180 days after the re-start of the Wellons Boiler and according to conditionM15(r). *[Origin: 40 CFR 63.7515(g)]*
- **e)** If the Permittee switches fuel combusted in the Wellons Boiler and cannot show that the new fuel does not increase the chlorine, mercury, or TSM input into the Wellons Boiler through the results of fuel analysis, then performance testing to demonstrate compliance while burning the new fuel shall be conducted within ninety days of first combusting the new fuel. *[Origin: 40 CFR 63.7530(b)]*

[Origin: listed by sub-condition]
[Authority: WAC 173-401-615(1)(a)]

M12. Wellons Boiler Performance Testing. When testing is required, the Permittee must test the Wellons Boiler as follows:

- **a)** All performance testing shall be conducted according to this condition including developing a site-specific **Stack Test Plan** per condition M12(b). *[Origin: 40 CFR 63.7520(a)]*
- **b)** **Stack Test Plan**: Before conducting a required performance test, the Permittee shall develop a site-specific **Stack Test Plan**. The Stack Test Plan shall include a test program summary, the test schedule, data quality objectives, and both an internal and external quality assurance (QA) program. Data quality objectives are the pretest expectations of precision, accuracy, and completeness of data. *[Origin: 40 CFR 63.7520(a); 40 CFR 63.7(c)(2),(i)]*

c) Internal QA Program: The internal QA program shall include, at a minimum, the activities planned by routine operators and analysts to provide an assessment of test data precision; an example of internal QA is the sampling and analysis of replicate samples. *[Origin: 40 CFR 63.7520(a); 40 CFR 63.7(c)(2)(ii)]*

d) Performance Audit: Performance testing shall include a test method performance audit (PA) as required under 40 CFR 63.7(c)(2)(iii), provided an audit sample meeting the requirements in 40 CFR 63.7(c)(2)(iii)(A) is commercially available. *[Origin: 40 CFR 63.7520(a); 40 CFR 63.7(c)(2)(iii)]*

e) Performance testing facilities. The Permittee shall provide performance testing facilities as follows:

- **i)** Sampling ports adequate for test methods applicable to such source. This includes:
  - (1) Constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and procedures; and
  - (2) Providing a stack or duct free of cyclonic flow during performance tests, as demonstrated by applicable test methods and procedures;
- **ii)** Safe sampling platform(s);
- **iii)** Safe access to sampling platform(s);
- **iv)** Utilities for sampling and testing equipment; and
- **v)** Any other facilities that ORCAA deems necessary for safe and adequate testing of a source. *[Origin: 40 CFR 63.7520(a); 40 CFR 63.7(d); 93NOC508, condition 7(as revised 3/10/1999)]*

f) Performance testing shall be conducted under such conditions as ORCAA specifies to the Permittee based on the representative performance of the boiler for the period being tested. Upon request, the Permittee shall make available to ORCAA such records as may be necessary to determine the conditions of the performance tests. *[Origin: 40 CFR 63.7520(a)]*

g) The Permittee must conduct each performance test according to the following required test methods:

TABLE 4 : Required Test Methods (From Table 5 to Subpart DDDDD of 40 CFR Part 63)

To conduct a performance test for the following pollutant . . .	You must. . .	Using, as appropriate . . .
1. Filterable PM	a. Select sampling ports location and the number of traverse points	Method 1 at 40 CFR part 60, appendix A-1 of this chapter.
	b. Determine velocity and volumetric flow-rate of the stack gas	Method 2, 2F, or 2G at 40 CFR part 60, appendix A-1 or A-2 to part 60 of this chapter.
	c. Determine oxygen or carbon dioxide concentration of the stack gas	Method 3A or 3B at 40 CFR part 60, appendix A-2 to part 60 of this chapter, or ANSI/ASME PTC 19.10-1981.a
	d. Measure the moisture content of the stack gas	Method 4 at 40 CFR part 60, appendix A-3 of this chapter.

To conduct a performance test for the following pollutant . . .	You must. . .	Using, as appropriate . . .
	e. Measure the PM emission concentration	Method 5 or 17 (positive pressure fabric filters must use Method 5D) at 40 CFR part 60, appendix A-3 or A-6 of this chapter.
	f. Convert emissions concentration to lb per MMBtu emission rates	Method 19 F-factor methodology at 40 CFR part 60, appendix A-7 of this chapter.
3. Hydrogen chloride	a. Select sampling ports location and the number of traverse points	Method 1 at 40 CFR part 60, appendix A-1 of this chapter.
	b. Determine velocity and volumetric flow-rate of the stack gas	Method 2, 2F, or 2G at 40 CFR part 60, appendix A-2 of this chapter.
	c. Determine oxygen or carbon dioxide concentration of the stack gas	Method 3A or 3B at 40 CFR part 60, appendix A-2 of this chapter, or ANSI/ASME PTC 19.10- 1981.a
	d. Measure the moisture content of the stack gas	Method 4 at 40 CFR part 60, appendix A-3 of this chapter.
	e. Measure the hydrogen chloride emission concentration	Method 26 or 26A (M26 or M26A) at 40 CFR part 60, appendix A-8 of this chapter.
	f. Convert emissions concentration to lb per MMBtu emission rates	Method 19 F-factor methodology at 40 CFR part 60, appendix A-7 of this chapter.
4. Mercury	a. Select sampling ports location and the number of traverse points	Method 1 at 40 CFR part 60, appendix A-1 of this chapter.
	b. Determine velocity and volumetric flow-rate of the stack gas	Method 2, 2F, or 2G at 40 CFR part 60, appendix A-1 or A-2 of this chapter.
	c. Determine oxygen or carbon dioxide concentration of the stack gas	Method 3A or 3B at 40 CFR part 60, appendix A-1 of this chapter, or ANSI/ASME PTC 19.10- 1981.a
	d. Measure the moisture content of the stack gas	Method 4 at 40 CFR part 60, appendix A-3 of this chapter.
	e. Measure the mercury emission concentration	Method 29, 30A, or 30B (M29, M30A, or M30B) at 40 CFR part 60, appendix A-8 of this chapter or Method 101A at 40 CFR part 61, appendix B of this chapter, or ASTM Method D6784.a
	f. Convert emissions concentration to lb per MMBtu emission rates	Method 19 F-factor methodology at 40 CFR part 60, appendix A-7 of this chapter.
5. CO	a. Select the sampling ports location and the number of traverse points	Method 1 at 40 CFR part 60, appendix A-1 of this chapter.
	b. Determine oxygen concentration of the stack gas	Method 3A or 3B at 40 CFR part 60, appendix A-3 of this chapter, or ASTM D6522-00 (Reapproved 2005), or ANSI/ASME PTC 19.10-1981.a
	c. Measure the moisture content of the stack gas	Method 4 at 40 CFR part 60, appendix A-3 of this chapter.
	d. Measure the CO emission concentration	Method 10 at 40 CFR part 60, appendix A-4 of this chapter. Use a measurement span value of 2 times the concentration of the applicable emission limit.

[Origin: 40 CFR 63.7520(b)]

h) Additionally, for determining compliance with PM emission rate limits:

i) The temperature of the sample gas in the probe and filter holder shall be monitored and maintained at 160±14 °C (320±25 °F).

ii) The oxygen (O2) or CO2 sample must be obtained simultaneously with each run of Method 5, 5B, or 17 of appendix A by traversing the duct at the same sampling location.

iii) For each run using Method 5, 5B, or 17 of appendix A of this part, the PM emission rate expressed in lbs/MMBtu heat input must be determined using:

(1) The O2 or CO2 measurements and PM measurements obtained simultaneously with each run;

(2) The dry basis F factor; and

(3) The dry basis emission rate calculation procedure contained in Method 19. *[Origin: 40 CFR 60.46b(d)]*

i) The Permittee 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. *[Origin: 40 CFR 63.7520(c)]*

j) Following each performance test and until the next performance test, the Permittee must comply with the operating load limit as required by condition AR2.11. *[Origin: 40 CFR 63.7520(c)]*

k) The Permittee must conduct a minimum of three separate test runs for each performance test required in this section. For purpose of determining compliance with a relevant standard, the arithmetic mean of the results of the three runs shall apply. Upon receiving approval from ORCAA, results of a test run may be replaced with results of an additional test run in the event that:

i) A sample is accidentally lost after the testing team leaves the site; or

ii) Conditions occur in which one of the three runs must be discontinued because of forced shutdown; or

iii) Extreme meteorological conditions occur; or

iv) Other circumstances occur that are beyond the Permittee's control. [Origin: 40 CFR 63.7520(d) and 63.7(e)(3)]

l) Each test run must comply with the minimum applicable sampling times or volumes specified by the test method and the following minimum sampling time and volumes:

TABLE 5: Required minimum sampling times and volumes (From Table 2 to Subpart DDDDD of 40 CFR Part 63)

For the following pollutants . . .	**Use this specified sampling volume or test run duration . . .**
HCl	For M26A, Collect a minimum of 1 dscm per run. For M26, collect a minimum of 120 liters per run.
Mercury	For M29, collect a minimum of 3 dscm per run. For M30A or M30B, collect a minimum sample as specified in the method. For ASTM D6784 collect a minimum of 3 dscm.
CO	1 hr minimum sampling time.
Filterable PM (or TSM)	Collect a minimum of 2 dscm per run.

[Origin: 40 CFR 63.7520(d)]

m) To determine compliance with the emission limits, use the F-Factor methodology and equations in sections 12.2 and 12.3 of EPA Method 19 at 40 CFR part 60, appendix A-7 of this chapter to convert the measured particulate matter (PM) concentrations, the measured HCl concentrations, the measured mercury concentrations, and the measured TSM concentrations that result from the performance test to pounds per million Btu heat input emission rates. *[Origin: 40 CFR 63.7520(e)]*

n) Operating limits must be confirmed or reestablished during performance tests as follows:

TABLE 6: Required for Establishing Operating Limits (From Table 7 to Subpart DDDDD of 40 CFR Part 63)

If you have an applicable emission limit for. . .	And your operating limits are based on. . .	You must . . .	Using . . .	According to the following requirements
PM, TSM, or mercury	Opacity	Establish a site-specific maximum opacity level	Data from the opacity monitoring system during the PM performance test	You must collect opacity readings every 15 minutes during the entire period of the performance tests. Determine the average hourly opacity reading for each performance test run by computing the hourly averages using all of the 15-minute readings taken during each performance test run. Determine the highest hourly average opacity reading measured during the test run demonstrating compliance with the PM (or TSM) emission limitation.
Any pollutant for which compliance is demonstrated by a performance test	Boiler or process heater operating load	Establish a unit specific limit for maximum operating load according to condition AR2.12	Data from the operating load monitors or from steam generation monitors	You must collect operating load or steam generation data every 15 minutes during the entire period of the performance test. Determine the average operating load by computing the hourly averages using all of the 15-minute readings taken during each performance test. Determine the highest hourly average of the three test run averages during the performance test and multiply this by 1.1 (110 percent) as your operating limit.

[Origin: 40 CFR 63.7520(e)]

o) The Reference Method for determining compliance with any opacity limit is Method 9 of appendix A of 40 CFR Part 60. *[Origin: 40 CFR Part 60.46b(d)(7)]*

p) Except for a 30-day rolling average based on CEMS (or sorbent trap monitoring system) data, if measurement results for any pollutant are reported as below the method detection level (e.g., laboratory analytical results for one or more sample components are below the method defined analytical detection level), you must use the method detection level as the measured emissions level for that pollutant in calculating compliance. *[Origin: 40 CFR 63.7520(f)]*

q) Use of an Alternative Test Method: The Permittee may submit a request to use an alternative test method according to 40 CFR 63.7(f). Until authorized to use an intermediate or major change or alternative to a test method, the Permittee remains

subject to the requirements of this section and relevant standards. *[Origin: 40 CFR 63.7520(a); 40 CFR 63.7(f)]*

r) Waiver of performance tests: The Permittee may submit a request to waive a performance test according to 40 CFR 63.7(h). Until a waiver of a performance testing requirement has been granted by ORCAA under this condition, the affected source remains subject to the requirement to test. *[Origin: 40 CFR 63.7520(a); 40 CFR 63.7(h)]*

[Origins: listed by sub-condition]
[Authority: WAC 173-401-615(1)(a)]

M13. Wellons Boiler - Relative Accuracy Test Audits (RATA): The Permittee shall perform an annual Relative Accuracy Test Audit (RATA) of the stack gas flow CMS, steam CMS and CO and O_2 CEMS:

a) The RATA shall be conducted in accordance with the procedures in Appendix F of 40 CFR Part 60 and the appropriate performance specifications in Appendix B of 40 CFR Part 60.

b) RATA for CEMS shall be performed simultaneously.

c) RATA shall be performed simultaneously with required stack testing or as soon afterwards as feasible.

d) No more than 13 months shall pass between an annual RATA and the previous RATA.

[Origin: 40 CFR 63, §63.7525]
[Authority: WAC 173-401-615(1)(a)]

M14. Monitoring Operation of Boilers: The Permittee shall continuously monitor operation of both boilers (Wellons Boiler and Backup Boiler) and record:

a) The operational status in terms of whether each boiler is operating (f*uel combusted and steam sent to the mill*), on warm standby (*combusting fuel but not sending steam to the mill*) or shut down (*no fuel being combusted*).

b) The date and duration of each start-up and shut-down.

c) The amount and type of non-wood fuel combusted in the Wellons Boiler during each startup, shutdown and for transient flame stabilization in terms of MMBTU/hr per each fuel type.

d) The amount and composition of each category of wood fuel combusted in the Wellons Boiler on a monthly and 12 consecutive-month basis. The amount combusted must be in terms of bone-dry tons or an equivalent unit of measure. Composition shall be monitored in terms of BTU content, moisture, chloride content and percent non-wood constituents. Results of representative testing of each category of wood fuel is acceptable. The following categories of wood fuel must be monitored independently:

i) Mill residuals generated on-site from rafted logs;

ii) Mill residuals generated on-site from non-rafted logs; and,

iii) Wood from recycled construction/demolition debris.

e) The cumulative amount of all fuels combusted over the previous 12-consecutive month period in terms of MMBtu on a gross heat input.

[Origin: N/A - gap filling monitoring]
[Authority: WAC 173-401-615(1)(b)]

M15. Monitoring Compliance with Voluntary Limits. The Permittee shall monitor compliance with voluntary limits on emissions as follows:

- **a)** On a monthly basis, the Permittee shall calculate cumulative plant-wide CO emissions over the previous month and 12-consecutive month period as follows:
  - **i)** CO emissions from the Wellons Boiler shall be based on data from the CO CEMS.
  - **ii)** During periods of CO CEMS malfunctions, CO emissions from the Wellons Boiler shall be calculated using ORCAA-approved emissions factors.
  - **iii)** CO emissions from the Backup Boiler shall be based on an emissions factor of 84 pounds per million standard cubic foot (lb/106scf) of natural gas and the record of gas consumption. [Origin: 19NOR1326, condition 7a (5/12/2021)]
- **b)** The Permittee shall monitor operations of both boilers to assure the Backup Boiler is operated as a backup unit to the Wellons Boiler. *[Origin: 19NOR1326, condition 7c (5/12/2021)]*
- **c)** The Permittee shall monitor kiln-dried lumber production in terms of million board feet (MMbf). On a monthly basis, the Permittee shall calculate the total amount of kiln-dried lumber produced over the previous month and 12-consecutive-month period in terms of MMbf. *[Origin: 19NOR1326, condition 7b (5/12/2021)]*

[Origin: listed by sub-condition]
[Authority: WAC 173-401-615(1)(a)]

M16. GHG Monitoring Requirements. The Permittee shall monitor Mill operations, fuel rates and composition of fuels as necessary to report GHG emissions to Ecology in accordance with Chapter 173-441 WAC. The following monitoring provisions apply:

- **a)** Permittee shall develop a written GHG monitoring plan in accordance with WAC 173-441-050(6)(e). The Permittee shall revise the GHG monitoring plan as needed to reflect changes in processes, monitoring instrumentation, and quality assurance procedures; or to improve procedures for the maintenance and repair of monitoring systems to reduce the frequency of monitoring equipment downtime.
- **b)** If needed to monitor fuel consumption, flow meters and other measurement devices used to measure fuel feed rates, process steam flow rates, or feedstock flow rates to provide data to perform the GHG emissions calculations shall be calibrated according to the procedures specified in WAC 173-441-050(8).

[Origin: Chapter 173-441 WAC (state only)]
[Authority: WAC 173-401-615(1)(a)]

[END OF SECTION]

VIII. RECORDKEEPING (RK)

RK1. Retention and Availability of Records: The Permittee shall maintain all records required by this permit as follows:

a) Records must be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. *[Origin: 40 CFR 63.7560(b)]*

b) Records must be in a form suitable and readily available for expeditious review. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche. *[Origin: 40 CFR 63.7560(a), 40 CFR 63.10(b)(1)]*

c) Records must be kept on site, or they must be accessible from on site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. *[Origin: 40 CFR 63.7560(c)]*

d) After 2 years, records may be kept off site for the remaining 3 years. *[Origin: 40 CFR 63.7560(c)]*

[Origins: WAC 173-401-615(2)(c) and as cited above]
[Authority: WAC 173-401-615(2)]

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

RK3. Monitoring Records. The Permittee shall keep the following records:

Required Monitoring (Origin)	Required Monitoring Records
Plant-wide Opacity Surveys *(Origin: M1)*	Records of each monthly opacity survey including: a) The date, location, time, wind direction, sky condition, sun location with respect to the Mill; b) Identification the person conducting the survey/reading; c) Opacity observation results for all emissions units in terms of whether opacity was observed or not; d) Operating status of each emission unit operating conditions, results; and, e) Whether an opacity compliance demonstration per condition M2 was triggered for each emissions unit.
Opacity Compliance Demonstration Required *(Origin: M2)*	a) For emissions units triggering Reference Method testing for compliance with an opacity standard, record of any Reference Method opacity readings conducted including all information in the standard form provided in Attachment 2. b) Records confirming EPA Method 9 certification for any person conducting Reference Method opacity readings. c) For fugitive emissions units or activities triggering Reference Method testing for compliance with an opacity standard, records documenting whether reasonable and/or appropriate precautions were being taken to prevent the fugitive emissions.
Complaint Monitoring *(Origin: M3)*	The Permittee shall keep a record of air quality related complaints received, the assessment of the validity of each complaint, and what, if

	any, corrective action was taken in response to the complaint. Records shall include, if available or provided, the following information: a) Description of the complaint; b) Date and time the alleged impact was first noticed; c) Date and time the alleged impact was last noticed; d) Location where the alleged impact was experienced; e) Name and phone number of caller; f) The Permittee's assessment of the complaint; and, g) Description of any investigation or corrective action taken.
Monthly Audit of Fugitive Emissions and Dust (Fugitive Emissions) *(Origin: M4)*	Records of monthly audits, including: a) The date, time and person conducting the audit; Identification of each fugitive emissions source evaluated and whether fugitive emissions was observed during the audit; b) For each fugitive emissions source evaluated, a description of the measures taken to prevent fugitive emissions and an assessment whether all reasonable and/or appropriate precautions were being taken; c) Recommendations of any additional measures to prevent fugitive emissions or dust.
Fuel-specific Sulfur Monitoring *(Origin: M5)*	The specific records identified in Table M2 for each emissions unit and for each fuel type combusted.
Periodic Monitoring *(Origin: M6)*	a) Secondary voltage and amperage to each field in the ESP. b) Continuous record of kiln drying temperatures. c) Daily average kiln drying temperatures. d) Dry kiln dry-bulb set point temperatures used for each batch or the standard dry-bulb set point temperature used. e) Schematic or description of standard locations for dry kiln temperature sensor placement. f) Weekly baghouse inspection records g) Weekly baghouse pressure drop records
Wellons Boiler Opacity Monitoring Records *(Origin: M7)*	Opacity in terms of the following averaging periods: a) 6-minute averages b) Daily block averages Records documenting the following: a) Periods during which the COMS is malfunctioning or inoperative (including out-of-control periods). b) Performance evaluations. c) Calibration checks. d) Adjustments and maintenance performed.
Wellons Boiler CO Monitoring Records *(Origin: M8)*	CO emissions in terms of the following units and averaging periods: a) 30-hour rolling average concentrations in ppm dry at 3% O2 b) 1-hour average emission rates in terms of lbs/MMBtu heat input c) 1-hour average pollutant mass rates in terms of lbs/hr Records documenting the following: a) Periods during which the CO or O2 CEMS are malfunctioning or inoperative (including out-of-control periods). b) Performance evaluations. c) Calibration checks. d) Adjustments and maintenance performed.
Wellons Boiler Stack gas Flow Monitoring Records *(Origin: M9)*	Wellons Boiler stack gas flow in terms of: a) Dry standard cubic feet per minute (dscfm) b) MMBtu/hr heat input

	Records documenting the following: a) Periods during which the stack gas flow CMS is malfunctioning or inoperative (including out-of-control periods). b) Performance evaluations. c) Calibration checks. d) Adjustments and maintenance performed.
Wellons Boiler Steam Production Monitoring Records *(Origin: M10)*	Steam production in terms of: a) The rate of steam produced in terms of lbs per hour (hourly ave.) b) 30-day average steam production rate in lbs/hr Records documenting the following: a) Periods during which the steam CMS is malfunctioning or inoperative (including out-of-control periods). b) Performance evaluations. c) Calibration checks. d) Adjustments and maintenance performed.
Stack Testing Records *(Origins: M11 & M12)*	The following records are required for any stack testing conducted: a) The stack test protocol or plan b) Final stack test report c) Included with each final boiler test report, the following CMS data averaged over each test run: i. Steam production ii. Stack flow iii. Secondary voltage across the ESP plates iv. Current to the ESP plates v. Opacity vi. Fuel sample composition, heat content and moisture content.
Wellons Boiler RATA Records *(Origin: M13)*	Results (Final Reports) for all required annual Relative Accuracy Test Audits (RATA) of CEMS and CMS.
Boiler Operating Records *(Origin: M14)*	The following operating records for each boiler: a) Daily record of boiler operating status in terms of cumulative operating hours (fuel combusted and steam sent to the mill), warm standby hours (combusting fuel but not sending steam to the mill) and shut down hours (no fuel being combusted) b) The annual capacity factor of each type of fuel combusted determined monthly and on a 12-continuous month basis c) The cumulative amount of fuel combusted over the previous 12-consecutive month period in terms of MMBtu on a gross heat input. d) Records of the occurrence and duration of each malfunction of the boiler or of the associated air pollution control and monitoring equipment. e) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in condition AR2.10, including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation. f) Maintenance log showing the date and providing a description of each maintenance and upgrade event. g) Records of the occurrence and duration of each boiler malfunction or associated air pollution control and monitoring equipment. h) Records of actions taken during periods of boiler malfunction to minimize emissions in accordance with the general duty to minimize emissions, including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation. i) For each startup and shutdown of the Wellons Boiler, records of: • The date and duration of each start-up and shut-down

	• The type(s) and amount(s) of fuels used during each startup and shutdown.
Record of Compliance with Voluntary Limits *(Origin: M15)*	a) Cumulative, plant-wide CO emissions over the previous month and 12-consecutive month period as follows. b) Kiln-dried lumber produced over the previous month and 12-consecutive-month period in terms of MMbf. c) Calculations involved in determining wither plant-wide CO emissions or kiln-dried lumber produced.
GHG Monitoring Records *(Origin: M16)*	a) The Permittee's written GHG monitoring plan. b) All records associated with monitoring GHG emissions from the Mill in accordance with the Permittee's written GHG monitoring plan.
Boiler Tune-up Records *(Origins: AR2.14 and AR3.2)*	Boiler tune-up records
Wellons Boiler site-specific monitoring plan (SMP) *(Origin: AR2.16)*	SMP according to the requirements of §63.7505(d) for all continuous monitoring systems used to demonstrate compliance with the Part 63 emission limits. The site-specific monitoring plan shall be retained on site and made available to the ORCAA upon request.
Wellons Boiler Wood Fuel Quality Assurance *(Origin: AR2.18)*	A copy of the Wellons Boiler Wood Fuel Quality Assurance Plan approved by ORCAA.
Baghouse Performance Records *(Origin: AR4.5)*	For each baghouse, any one of the following records documenting baghouse performance: a) Site specific test results b) Test results for a similar unit; or, c) Engineering calculations.
Anti-mold Solution Records *(Origin: AR4.13)*	Safety data Sheets (SDS), Material Safety Data Sheets (MSDS) or other documents certifying the composition of the anti-mold solutions applied.
Spray Application of End Shield *(Origin: AR4.15)*	a) Safety data Sheets (SDS), Material Safety Data Sheets (MSDS) or other documents certifying the composition the End Shield used. b) The amount of End Shield used per month and year.

[Origin: As indicated in Table]
[Authority: WAC 173-401-615(2)]

RK4. Record of Permit Deviations. The Permittee shall maintain a contemporaneous record of all permit deviations.
[Origin: WAC 173-401-615(3)(b)]
[Authority: WAC 173-401-615(2)]

RK5. Emissions Records. The Permittee shall maintain and make available upon request any records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards.
[Origin: WAC 173-400-105(1); ORCAA Rule 8.11(a) (local only)]
[Authority: WAC 173-401-615(2)]

RK6. Unlawful Reproduction or Alteration of Documents. No person shall reproduce or alter, or cause to be reproduced or altered, any order, registration certificate or other paper issued by ORCAA if the purpose of such reproduction or alteration is to evade or violate any applicable requirement.
[Origin: ORCAA Rule 7.3 (local only)]
[Authority: WAC 173-401-615(2)]

RK7. Display of Orders, Certificates and Other Notices. Any report, plan, order, certificate, or notice required by this permit or under ORCAA Regulations shall be retained and made available upon request. In the event ORCAA requires a notice to be displayed, it shall be posted.
[Origin: ORCAA Rule 7.4 (local only)]
[Authority: WAC 173-401-615(2)]

RK8. Record of Actions Taken to Maintain Air Pollution Control Equipment. The Permittee shall keep a record of any actions taken to maintain air pollution control equipment in good operating condition and repair including repairs or routine maintenance actions and actions involving only inspection of the equipment. Such records shall include:

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

[Origin: ORCAA Rule 8.8 (local only)]
[Authority: WAC 173-401-615(2)]

RK9. Additional Boiler MACT Records. In addition to the records specified in condition RK3, the Permittee must maintain the following records required under 40 CFR Part 63, Subpart DDDDD:

- **a)** Copies of up-to-date and representative Safety Data Sheets (SDS) of all HAP-containing materials used in quantities that result in more than 0.5 tons per year of any criteria air pollutant or precursor including Volatile Organic Compounds (VOC). *[Origin: 40 CFR 63.1(b)(3); 40 CFR 63.10(b)(3)]*
- **b)** A copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report submitted. *[Origin: 40 CFR 63.7555(a)(1)]*
- **c)** If stack testing of the Wellons Boiler is less frequent than annually as allowed under condition M11, a record documenting that emissions during the previous stack test(s) were less than 75 percent of the applicable emission limit, and document that there was no change in source operations including fuel composition and operation of air pollution

control equipment that would cause emissions of the relevant pollutant to increase within the past year. *[Origin: 40 CFR 63.7555(d)(5)]*

[Origins: specified per sub-condition]
[Authority: WAC 173-401-615(2)]

RK10. Additional Mill Records. The following records shall be maintained:

a) Planer mill cyclone design specifications including design cut particle diameter with 50% collection efficiency (d50) and fractional efficiency curves. These records shall be maintained for the useful life of each cyclone;

b) Documentation of baghouse bag filtering efficiency. These records shall be maintained for the useful life of each baghouse;

[Origin: 19NOR1326, condition 8 (5/12/2021)]
[Authority: WAC 173-401-615(2)]

RK11. MACT Applicability Records. For each relevant standard or other applicable requirement under 40 CFR Part 63, which the Permittee determines inapplicable, the Permittee shall keep record of the applicability determination on site for 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. For the purposes of this condition, a relevant standard is defined as any standard for which:

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

b) The source belongs to the source category regulated by the standard.

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

[Origin: 40 CFR § 63.1(b)(3); 40 CFR § 63.10(b)(3)]
[Authority: WAC 173-401-615(2)]

RK12. Records Required for Greenhouse Gas (GHG) Reporting. If the Permittee is required to prepare annual GHG reports to Ecology pursuant to Chapter 173-441 WAC, the Permittee shall maintain records in accordance with WAC 173-441-050, retaining, at a minimum, the following:

a) A list of all units, operations, processes, and activities for which GHG emissions were calculated.

b) The data used to calculate the GHG emissions for each unit, operation, process, and activity, categorized by fuel or material type. These data include, but are not limited to, the following information:

i) The GHG emissions calculations and methods used, as required by WAC 173-441-120.

ii) Analytical results for the development of site-specific emissions factors.

iii) The results of all required analyses for high heat value, carbon content, and other required fuel or feedstock parameters.

iv) Any Mill operating data/process information used for the GHG emission calculations.

c) Copies of the annual GHG reports.

d) Missing data computations. For each missing data event, also retain a record of the cause of the event and the corrective actions taken to restore malfunctioning monitoring equipment.

e) The GHG Emissions Monitoring Plan required by condition M16.

f) The results of all required certification and quality assurance tests of continuous monitoring systems, fuel flow meters, and other instrumentation used to provide data for the GHGs reported under this chapter.

g) Maintenance records for all continuous monitoring systems, flow meters, and other instrumentation used to provide data for the GHGs reported under this chapter.

[Origin: WAC 173-441-050(6) (state only)]
[Authority: WAC 173-401-615(2)]

[END OF SECTION]

IX. REPORTING (R)

R1. Annual Compliance Certification. The Permittee shall submit an Annual Compliance Certification report to ORCAA and the Administrator, in care of Region 10 of the EPA (EPA) certifying the status of compliance with respect to all permit conditions during the previous 12-month period. Annual Compliance Certification Reports shall be submitted to ORCAA and EPA on or before January 30 each year and shall cover the continuous 12-month period ending the previous December 31st (January 1st through December 31st). Annual Compliance Certification Reports shall certify the status of compliance continuously over the certification period, and the certification period shall not exceed 12 months from the end of the certification period covered in the previous certification. The reports shall be certified by a responsible official in accordance with condition G5. Annual Compliance Certification reports shall include:

a) Identification of each term or condition of the permit that is the basis of the certification.

b) Certification of the status of compliance with each term or condition of the permit and whether compliance was continuous or intermittent over the reporting period.

c) Identification of the method(s) or other means used by the Permittee for determining the compliance status, and whether such methods or other means provide continuous or intermittent data.

[Origin: WAC 173-401-630(5)]
[Authority: WAC 173-401-615(3)]

R2. Confidential Information. Records or other information submitted to ORCAA, that are considered by the Permittee to be proprietary and confidential, shall be only for the confidential use of ORCAA provided:

a) The information relates to processes or production unique to the Permittee or are likely to affect adversely the competitive position of the Permittee if released to the public or to a competitor;

b) The Permittee follows ORCAA's policy for submitting confidential information; and,

c) The Permittee certifies the proprietary and/or confidential nature of the records or information.

[Origin: ORCAA Rule 1.6 (local only)]
[Authority: WAC 173-401-615(3)]

R3. Semi-Annual Monitoring Reports. The Permittee shall submit a semi-annual monitoring report (SAMR) summarizing monitoring conducted during the previous continuous six-month period on or before January 30th and July 30th of each year. SAMRs submitted by January 30th shall include, at a minimum, monitoring conducted during July 1st through December 31st of the previous year. SAMRs submitted by July 30th shall cover, at a minimum, monitoring conducted during the previous January 1st through June 30th. SAMRs shall include a summary of results from all monitoring required by this permit. SAMRs shall be certified by a responsible official in accordance with condition G5 and shall include the following information as applicable:

a) A summary of results of all required monitoring for all emissions units over the reporting period;
b) Identification and characterization of all instances of deviations from permit requirements;
c) Summary description of any corrective actions taken to maintain air pollution controls in good operating condition;
d) Summary information on the number, duration and cause (including unknown cause, if applicable) of downtime of any CMS required by this permit (other than downtime associated with zero and span or other daily calibration checks, if applicable).
e) For boilers, the SAMR must include the information required to be submitted to the Administrator per condition R10a.

[Origin: WAC 173-401-615(3)(a)]
[Authority: WAC 173-401-615(3)(a)]

R4. Reporting Deviations from Permit Conditions. The Permittee shall promptly report any deviations from permit conditions, including those attributable to upset conditions as defined in this permit. The following conditions shall apply:

a) **Prompt Reporting.** For purposes of this permit, submitting a report "promptly" means the following:
  i) **Potential Threat to Human Health or Safety:** If the deviation presents a potential threat to human health or safety, "promptly" means as soon as possible but no later than 12 hours after discovery of the deviation. This notification may be made by email, however, the Permittee shall also submit a written notice within 10 days of the occurrence;
  ii) **Other Deviations:** For other deviations, "promptly" means as soon as possible but no later than 30 days after the end of the month during which the deviation was discovered;
  iii) **Emergencies:** Except for potential threats to human health or safety, deviations due to an emergency (as defined in condition A12) must be reported within two working days of the time when emission limitations were exceeded to qualify for relief under condition A12.
b) **Deviation Report Content.** Permit deviation reports shall describe the probable cause of such deviations, corrective actions taken or planned, and preventive measures taken.
c) **Reporting Unavoidable Excess Emissions.** The deviation report may include demonstration that excess emissions were unavoidable due to start-up, shutdown, upset or malfunction, consistent with the requirements of either condition A13 or A14, as applicable.
d) **Reporting Deviations due to Emergencies.** The deviation report may include demonstration that excess emissions were due to an emergency, consistent with the requirements of condition A12.

[Origin: WAC 173-401-615(3)(b); WAC 173-401-645(3)(d)]]
[Authority: WAC 173-401-615(3)]

R5. Notification of Complaint Received. The Permittee shall notify ORCAA of any complaint received as soon as possible, but no later than two business days from when the complaint is received. If requested by ORCAA, the Permittee shall submit a complaint investigation report which shall include a short description of the complaint, time it was received, actions taken, actions planned and preliminary assessment. Any complaint investigation report submitted shall be certified according to condition G5.
[Origin: WAC 173-400-040(6) (state/local only); ORCAA Rule 7.6 (local only); ORCAA Rule 8.3(e) (local only); ORCAA Rule 8.5 (local only);]
[Authority: WAC 173-401-615(3)]

R6. Annual Inventory Report. No later than March 1st of each year, the Permittee shall submit an inventory of the actual amount of pollutants emitted during the previous calendar year. The inventory shall be submitted to ORCAA on standard inventory reporting forms and be accompanied by associated calculations, data or other information used in calculating the reported emissions. A request for an extension may be considered if a request from the Responsible Official is received by ORCAA prior to February 25th. The request must include a statement of the unexpected circumstances that occurred, how this affected the Permittee's ability to submit the report on time, and the number of additional days needed.
[WAC 173-400-105(1); ORCAA Rule 8.11 (local only)]
[Authority: WAC 173-401-615(3)]

R7. Stack Emissions Test Plans (General). A notification and test protocol must be provided to ORCAA for approval at least 30 days prior to conducting any stack emissions testing. Boilers are also subject to the testing notification requirements under condition R9a.
[Origin: 19NOR1326, condition 9(a) (5/12/2021)]
[Authority: WAC 173-401-615(3)]

R8. Stack Emissions Testing Reports (General). The Permittee must submit a final report to ORCAA for any stack emissions testing within 60 days of the completing the test. Final reports for any stack emissions testing of boilers must also be reported to the Administrator per condition R10b.
[Origin: WAC 173-401-615(3)(a)]
[Authority: WAC 173-401-615(3)]

R9. Boiler MACT Notifications. The Permittee must submit the following notifications to the Administrator and ORCAA by the due dates specified:

a) Performance Test Notification:

i) The Permittee must notify the Administrator and ORCAA in writing of the intent to conduct a performance test of either boiler at least 60 calendar days before the performance test is initially scheduled to begin. *[Origin: 40 CFR 63.7545(a); 40 CFR 63.7(b)(1); 40 CFR 63.9(c)]*

ii) In the event the Permittee is unable to conduct a performance test on the date specified in a notification due to unforeseeable circumstances beyond the

Permittee's control, the Permittee must notify the Administrator and ORCAA as soon as practicable and without delay prior to the scheduled performance test date and specify the date when the performance test is rescheduled. This notification of delay in conducting the performance test shall not relieve the Permittee of legal responsibility for compliance with any other applicable provisions of the effective AOP or with any other applicable Federal, State, or local requirement. *[Origin: 40 CFR 63.7545(a); 40 CFR 63.7(b)(2)]*

b) **Test Plan**: The Permittee shall submit the site-specific **Stack Test Plan** required under condition M12(b) to ORCAA, and the Administrator upon the Administrator's request, at least 60 calendar days before a performance test of a boiler is scheduled to take place (simultaneously with the notification of intention to conduct a performance test). *[Origin: 40 CFR 63.7545(a); 40 CFR 63.7(c)(2)(iv)]*

c) **CMS Performance Evaluation Notification.** The Permittee shall notify the Administrator and ORCAA in writing of the date of any required CMS performance evaluation simultaneously with the notification of the performance test date or at least 60 days prior to the date the performance evaluation is scheduled to begin if no performance test is required. *[Origin: 40 CFR 63.7545(a); 40 CFR 63.8(e)(2); 40 CFR 63.9(g)(1)]*

d) **CMS Performance Evaluation Test Plan**: Before conducting a required CMS performance evaluation, the Permittee shall submit the site-specific **CMS Performance Evaluation Test Plan** to ORCAA and to the Administrator (if requested) at 60 days before the performance test or performance evaluation is scheduled to begin. *[Origin: 40 CFR 63.7545(a); 40 CFR 63.8(e)(3)(iii)]*

e) For the Backup Boiler, notification of any alternative fuel use within 48 hours of the declaration of each period of natural gas curtailment or supply interruption. Period of gas curtailment or supply interruption means a period of time during which the supply of gaseous fuel to an affected boiler or process heater is restricted or halted for reasons beyond the control of the Mill. The act of entering into a contractual agreement with a supplier of natural gas established for curtailment purposes does not constitute a reason that is under the control of a facility for the purposes of this definition. An increase in the cost or unit price of natural gas due to normal market fluctuations not during periods of supplier delivery restriction does not constitute a period of natural gas curtailment or supply interruption. On-site gaseous fuel system emergencies or equipment failures qualify as periods of supply interruption when the emergency or failure is beyond the control of the facility. The notification must include the following information:

- **i)** Company name and address;
- **ii)** Identification of the affected unit;
- **iii)** Reason the Permittee is unable to use natural gas or equivalent fuel, including the date when the natural gas curtailment was declared or the natural gas supply interruption began;
- **iv)** Type of alternative fuel; and,
- **v)** Dates when the alternative fuel use is expected to begin and end. *[Origin: 40 CFR 63.7545(f)]*

f) Notice of any physical change or fuel switch ro either boiler resulting in a different boiler subcategory under 40 CFR 63.7499 becoming applicable. The notice must be made within 30 days of the switch/change and must identify:
- **i)** The name of the Permittee, the location of the source, the boiler(s) and process heater(s) that have switched fuels or were physically changed, and the date of the notice;
- **ii)** The currently applicable subcategory under this subpart; and,
- **iii)** The date upon which the fuel switch or physical change occurred. *[Origin: 40 CFR 63.7545(h)]*

g) The following notifications as applicable must be submitted:
- **i)** Initial notifications. *[Origin: 40 CFR 63.7545(a); 40 CFR 63.9(b)]*
- **ii)** Request for extension of compliance. *[Origin: 40 CFR 63.7545(a); 40 CFR 63.9(c)]*
- **iii)** Notification of opacity and visible emission observations, if such observations are required for the source by a relevant standard. *[Origin: 40 CFR 63.7545(a); 40 CFR 63.9(f)]*
- **iv)** Requests for adjustment to time periods or postmark deadlines for submittal and review of required communications. *[Origin: 40 CFR 63.7545(a); 40 CFR 63.9(i)]*

h) Any change in the information already provided under this condition shall be provided to ORCAA and the Administrator in writing within 15 calendar days after the change. *[Origin: 40 CFR 63.7545(a); 40 CFR 63.9(j)]*

[Origin: listed by sub-condition]
[Authority: WAC 173-401-615(3)]

R10. Boiler MACT Reporting. The following additional reporting requirements apply to boilers subject to 40 CFR Part 63, Subpart DDDDD (aka: Boiler MACT):

a) Semi-Annual Compliance Reports for Boilers – According to the schedule, due dates and reporting periods required under condition R3 for the SAMR, the Permittee must submit Semi-Annual Compliance Reports electronically to the EPA Administrator via the EPA's Compliance and Emissions Data Reporting Interface (CEDRI) per condition R11. Semi-Annual Compliance Reports must include the following information:
- **i)** Company and Mill name and address. *[Origin: 40 CFR 63.7550(c)(5)(i)]*
- **ii)** Process unit information, emissions limitations, and operating parameter limitations. *[Origin: 40 CFR 63.7550(c)(5)(ii)]*
- **iii)** Date of report and beginning and ending dates of the reporting period. *[Origin: 40 CFR 63.7550(c)(5)(iii)]*
- **iv)** The total operating time during the reporting period. *[Origin: 40 CFR 63.7550(c)(5)(iii)]*
- **v)** Manufacturer name and model number, and the date of the last CMS certification or audit of the COMS required by condition M7, the CO CEMS and oxygen analyzer required by condition M8 and the steam production CPMS required by condition M10. *[Origin: 40 CFR 63.7550(c)(5)(v)]*
- **vi)** The total fuel use each boiler within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste

determination by the Administrator or ORCAA, or the basis for concluding that the fuel is not a waste, and the total fuel usage amount with units of measure. *[Origin: 40 CFR 63.7550(c)(5)(vi)]*

vii) If conducting performance tests once every 3 years as provided by condition M11, the date of the last 2 performance tests and a statement as to whether there have been any operational changes since the last performance test that could increase emissions. *[Origin: 40 CFR 63.7550(c)(5)(vii)]*

viii) A statement indicating that no new types of fuel were burned in any boiler, or a demonstration of compliance with HCl and mercury limits according to 40 CFR 63.7550(c)(5)(viii). *[Origin: 40 CFR 63.7550(c)(5)(viii)]*

ix) If the Permittee plans to burn a new type of fuel in any boiler, the compliance report must include a statement indicating the intent to conduct a new performance test within 60 days of starting to burn the new fuel. *[Origin: 40 CFR 63.7550(c)(5)(ix)]*

x) If there were no deviations from any emission limits or operating limits in this permit, a statement that there were no deviations from the emission limits or operating limits during the reporting period. *[Origin: 40 CFR 63.7550(c)(5)(xi)]*

xi) If there were no deviations from the monitoring requirements including no periods during which the CMSs, including CEMS, COMS, and CPMS, were out of control, a statement that there were no deviations and no periods during which the CMS were out of control during the reporting period. *[Origin: 40 CFR 63.7550(c)(5)(xii)]*

xii) If a malfunction of a boiler or associated air pollution control device or CMS occurred during the reporting period, the report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken during each malfunction to minimize emissions in accordance with condition AR210, including actions taken to correct the malfunction. *[Origin: 40 CFR 63.7550(c)(5)(xiii)]*

xiii) For CMS out of control periods:

(1) Start and end dates and hours;

(2) Duration of each event; and,

(3) Descriptions of corrective actions taken. *[Origin: 40 CFR 63.7550(e)(3) and 40 CFR 63.8(c)(8)]*

xiv) Include the date of the most recent tune-up of each boiler. *[Origin: 40 CFR 63.7550(c)(5)(xiv)]*

xv) For each reporting period, the compliance reports must include all of the calculated 30 day rolling average values for CO CEMS and oxygen analyzer, 10 day rolling average values for CO CEMS when the limit is expressed as a 10 day instead of 30 day rolling average, COMS data and steam production CPMS data. *[Origin: 40 CFR 63.7550(c)(5)(xvi)]*

xvi) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. *[Origin: 40 CFR 63.7550(c)(5)(xvii)]*

xvii) For each instance of startup or shutdown of any boiler, include the information required to be monitored, collected, or recorded according to the requirements of condition RK3. *[Origin: 40 CFR 63.7550(c)(5)(xviii)]*

xviii) For each deviation from an emission limit, operating limit or the work practice standard for periods if startup and shutdown, the report must additionally contain the following information:

(1) A description of the deviation and which emission limit, operating limit, or work practice standard that was not met. *[Origin: 40 CFR 63.7550(d)(1)]*

(2) Information on the number, duration, and cause of deviations (including unknown cause), as applicable, and the corrective action taken. *[Origin: 40 CFR 63.7550(d)(2)]*

(3) If the deviation occurred during an annual performance test, provide the date the annual performance test was completed. *[Origin: 40 CFR 63.7550(d)(3)]*

(4) Description of the nature of the deviation (what was deviated from). *[Origin: 40 CFR 63.7550(e)(1)]*

(5) The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks. *[Origin: 40 CFR 63.7550(e)(2)]*

(6) The date and time that each deviation started and stopped. *[Origin: 40 CFR 63.7550(e)(4)]*

(7) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period. *[Origin: 40 CFR 63.7550(e)(5)]*

(8) A characterization of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes. *[Origin: 40 CFR 63.7550(e)(6)]*

(9) A summary of the total duration of CMS's downtime during the reporting period and the total duration of CMS downtime as a percent of the total source operating time during that reporting period. *[Origin: 40 CFR 63.7550(e)(7)]*

(10) A brief description of the source for which there was a deviation. *[Origin: 40 CFR 63.7550(e)(8)]*

(11) A description of any changes in CMSs, processes, or controls since the last reporting period for the source for which there was a deviation. *[Origin: 40 CFR 63.7550(e)(9)]*

b) Performance Test Reports – In addition to reporting to ORCAA per condition R8, performance test results for boilers must be submitted to the EPA Administrator as follows:

i) For testing using test methods supported by the EPA's Electronic Reporting Tool (ERT) as listed on the EPA's ERT Web site (http://www.epa.gov/ttn/chief/ert/index.html), results of the performance test must be submitted to the Administrator via the Compliance and Emissions Data Reporting Interface (CEDRI) per condition R11. *[Origin: WAC 173-401-615(3)(a)]*

ii) For testing using test methods that are not supported by the EPA's ERT as listed on the EPA's ERT Web site at the time of the test, submit the results of the performance test to the Administrator at the appropriate address listed in condition R11(b)(iv). *[Origin: 40 CFR 63.7550(h)(1)(ii)]*

iii) In addition to performance test results, the test report must also verify that the operating limits have not changed or provide documentation of revised operating limits established according to condition AR2.12. *[Origin: 40 CFR 63.7515(f)]*

c) CEMS Performance Evaluations - The Permittee must submit the results of each CEMS performance evaluation to the Administrator within 60 days after the date of completing each CEMS performance evaluation as follows:

i) For performance evaluations of continuous monitoring systems measuring relative accuracy test audit (RATA) pollutants that are supported by the EPA's ERT as listed on the EPA's ERT Web site at the time of the evaluation, submit the results of the performance evaluation to the Administrator via the CEDRI per condition R11.

ii) For any performance evaluation of continuous monitoring systems measuring RATA pollutants that are not supported by the EPA's ERT as listed on the ERT Web site at the time of the evaluation, submit the results of the performance evaluation to the Administrator at the appropriate address listed in condition R11(b)(iv). *[Origin: 40 CFR 63.7550(h)(2)(ii)]*

d) CMS Performance Evaluations - The Permittee shall furnish ORCAA, and the Administrator if requested, a copy of a written report of the results of the performance evaluation simultaneously with the results of any boiler performance test required or within 60 days of completion of the performance evaluation if no test is required. *[Origin: 40 CFR 63.8(e)(5)(i)]*

e) COMS Performance Evaluations - The Permittee shall furnish ORCAA, and the Administrator if requested, two or, upon request, three copies of a written report of the results of the COMS performance evaluation at least 15 calendar days before the performance test required per conditions M11 and M12. *[Origin: 40 CFR 63.8(e)(5)(ii)]*

f) Monitoring Plans - Upon request, the Permittee must submit any required site-specific **Monitoring Plan** to the Administrator and ORCAA for approval *[Origin: 40 CFR 63.7505(d)(1)]*

[Origin: listed by sub-condition]
[Authority: WAC 173-401-615(3)]

R11. Submitting Reports via CEDRI. Reports submitted electronically via CEDRI, which can be accessed through the EPA's CDX (https://cdx.epa.gov/), shall be submitted as follows:

a) If required to electronically submit a MACT notification or report via CEDRI, the Permittee must use the appropriate electronic report template on the CEDRI website (https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri) for the applicable subpart.

b) If the Permittee claims some of the information submitted via CEDRI is Confidential Business Information (CBI), submit a complete report, including information claimed to be CBI, to the EPA. The report must be generated using the appropriate form on the

CEDRI website or an alternate electronic file consistent with the XML schema listed on the CEDRI website. Submit the file on a compact disc, flash drive, or other commonly used electronic storage medium and clearly mark the medium as CBI. Mail the electronic medium to U.S. EPA/OAQPS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described earlier in this paragraph.

c) If you are required to electronically submit a report through CEDRI in EPA's CDX, you may assert a claim of EPA system outage for failure to timely comply with the reporting requirement. To assert a claim of EPA system outage, you must meet the requirements outlined in paragraphs (i) through (vii) below:

i) You must have been or will be precluded from accessing CEDRI and submitting a required report within the time prescribed due to an outage of either EPA's CEDRI or CDX systems.

ii) The outage must have occurred within the period of time beginning five business days prior to the date that the submission is due.

iii) The outage may be planned or unplanned.

iv) You must submit notification to the Administrator in writing as soon as possible following the date you first knew, or through due diligence should have known, that the event may cause or has caused a delay in reporting.

v) You must provide to the Administrator a written description identifying:

(1) The date(s) and time(s) when CDX or CEDRI was accessed and the system was unavailable;

(2) A rationale for attributing the delay in reporting beyond the regulatory deadline to EPA system outage;

(3) Measures taken or to be taken to minimize the delay in reporting; and

(4) The date by which you propose to report, or if you have already met the reporting requirement at the time of the notification, the date you reported.

vi) The decision to accept the claim of EPA system outage and allow an extension to the reporting deadline is solely within the discretion of the Administrator.

vii) In any circumstance, the report must be submitted electronically as soon as possible after the outage is resolved.

[Origin: 40 CFR 63.7550(h)]
[Authority: WAC 173-401-615(3)]

R12. Notification of Changes/Modifications to Wellons Boiler. ORCAA shall be notified prior to any alterations, changes in fuel type, replacements or increases in capacity, equipment, materials processed or operations which may increase the amount or type of air pollutant emitted by the Wellons Boiler.
[Origin: 93NOC508, condition #2 (as revised 3/10/1999)]
[Authority: WAC 173-401-615(3)]

R13. State Greenhouse Gas (GHG) Reporting. The Permittee shall be subject to the requirement to report greenhouse gas (GHG) emissions to Ecology in accordance with Chapter 173-441 WAC if annual, Mill-wide emissions of carbon dioxide equivalents (CO_2e) are 10,000 metric tons per year or more from all source categories listed in WAC 173-441-120. The following requirements shall apply:

- **a)** Once the Mill emits 10,000 metric tons of GHGs or more per calendar year, the Permittee shall report emissions of GHGs to Ecology annually thereafter unless the Permittee is allowed to discontinue reporting as allowed by WAC 173-441-030(5) and the specified notice is submitted to Ecology.
- **b)** To calculate GHG emissions, the Permittee shall include all GHGs listed in Table A-1 of WAC 173-441-040, including those emitted from the combustion of biomass, using equation A-1 from WAC 173-441-030(1)(b)(iii).
- **c)** Reports must meet the requirements of WAC 173-441-050, and include the annual emissions of the GHGs listed in WAC 173-441-040 from source categories listed in WAC 173-441-120.
- **d)** The annual GHG report shall be submitted electronically in accordance with the requirements of WAC 173-441-050 and 173-441-060 and in a format specified by Ecology.
- **e)** GHG emissions reports are due to Ecology:
  - **i)** No later than March 31 of each calendar year for GHG emissions in the previous calendar year for facilities required to report GHG emissions to the EPA under 40 CFR Part 98;
  - **ii)** No later than October 31st of each calendar year for GHG emissions in the previous calendar year for facilities not required to report GHG emissions to the EPA under 40 CFR Part 98.
- **f)** All requests, notifications, and communications to Ecology pursuant to GHG emissions reporting, other than submittal of the annual GHG report, shall be submitted to the following address:

  Greenhouse Gas Report, Air Quality Program
  Department of Ecology
  P.O. Box 47600
  Olympia, WA 98504-7600
- **g)** The Permittee shall submit a revised annual GHG report within 45 days of discovering an annual GHG report previously submitted contains one or more substantive errors. A substantive error is an error that impacts the quantity of GHG emissions reported or otherwise prevents the reported data from being validated or verified. The revised report must correct all substantive errors.
- **h)** Ecology may notify the Permittee in writing that an annual GHG report previously submitted contains one or more substantive errors. Such notification will identify each such error. The Permittee shall, within 45 days of receipt of the notification, either resubmit the report that, for each identified substantive error, corrects the identified substantive error (in accordance with the applicable requirements of this permit) or

provide information demonstrating the previously submitted report does not contain the identified substantive error or that the identified error is not a substantive error.

[Origin: Chapter 173-441 WAC (state only)]
[Authority: WAC 173-401-615(3)]

[END OF SECTION]

X. PERMIT SHIELD CONDITIONS (S)

S1. **Permit Shield.** Compliance with a permit condition shall be deemed compliance with the applicable requirements upon which that condition is based, as of the date of permit issuance. The permit shield does not apply to any insignificant emissions units or activity designated under WAC 173-401-530.
[Origin: WAC 173-401-640(1)]
[Authority: WAC 173-401-640(1)]

S2. **Inapplicable or Exempt Requirements.** The requirements shown in Table S.1, as of the date of permit issuance, have been determined not to apply to the corresponding emissions units indicated due to either inapplicability of the requirement or an exemption. Commencing the date of permit issuance, the AOP shield shall cover the requirements specified in Table S.1, as of the date of permit issuance, with respect to the specific emissions units indicated unless applicability of the requirement is triggered by a future action or emissions increase.
[Origin: WAC 173-401-640(2)]
[Authority: WAC 173-401-640(1)]

S3. **Exclusions.** Nothing in this permit shall alter or affect the following:

- **a)** The provisions of Section 303 of the FCAA (emergency orders), including the authority of the Administrator under that section,
- **b)** The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance,
- **c)** The applicable requirements of the acid rain program, consistent with section 408(a) of the FCAA,
- **d)** The ability of EPA to obtain information from a source pursuant to section 114 of the FCAA, or
- **e)** The ability of the permitting authority to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in chapter 252, Laws of 1993.

[Origin: WAC 173-401-640(4)]
[Authority: WAC 173-401-640(1)]

[END OF SECTION]

TABLE S.1 RELEVANT REQUIREMENTS DETERMINED INAPPLICABLE OR EXEMPT

Relevant Requirement	Exempt or Inapplicable	Brief Description of Requirement	Basis
WAC 173-400-100	Inapplicable	Registration required for listed sources, excluding sources subject to the operating permit program.	The Mill is subject to the operating permit program.
ORCAA Regulation 4	Exempt	Requires registration of regulated air pollution sources.	Per Rule 4.1(a), sources required to obtain an air operating permit are exempt.
ORCAA 8.1	Inapplicable	Residential wood heating standards.	The Mill does not include any residential wood heating devices.
WAC 173-400-040(4)(b)	Inapplicable	Fugitive Emissions (Non-attainment requirements): Emission units identified as significant contributors to non-attainment must use reasonable and available control methods to control emission of contaminants for which the area is designated non-attainment.	There are no non-attainment areas within Mason County or within ORCAA's jurisdiction.
WAC 173-400-040(9)(b)	Inapplicable	Fugitive Dust (Non-attainment requirements): Fugitive dust sources identified as significant contributors to PM10 non-attainment must apply RACT.	There are no non-attainment areas within Mason County or within ORCAA's jurisdiction.
WAC 173-435	Inapplicable	Emergency episode plan requirements	The Mill has not been requested to prepare such a plan.
40 CFR Part 68	Inapplicable	Risk Management Programs: Requirements for Title V sources.	40 CFR Part 68 applies to any facility that has more than a threshold quantity of a regulated substance in a process, as determined under §68.115. SPI does not use or store any materials above the threshold quantities listed in 40 CFR Part 68.
WAC 173-401-635	Inapplicable	Temporary Title V Sources: No "affected source" as defined in WAC 173-401-200(1) shall be permitted as a temporary source [WAC 173-401-635].	WAC 173-401-635 provides that the permitting authority may issue a single AOP authorizing emissions from similar operations at multiple temporary locations, except for "affected sources." Since this permit is for a single location, this provision does not apply.
40 CFR Part 98 Mandatory Greenhouse Gas Reporting (Federal)	Not an applicable requirement under the state and federal Clean Air Acts	Federal Mandatory Greenhouse Gas Reporting Rule. Establishes requirements for reporting emissions of GHGs.	These requirements are not pursuant to either the state or federal Clean Air Acts and, therefore, are not "Applicable Requirements" for purposes of Title V.
40 CFR Part 64 Compliance Assurance Monitoring (CAM) Rule	Inapplicable	Establishes the minimum requirements for compliance assurance monitoring at major sources	See Technical Support Document

Permit Attachments

Attachment 1: Opacity Form

Company Name		
Location		
City	State	Zip
Process Equipment		Operating Mode
Control Equipment		Operating Mode

Description of Emission Point	
Height above Ground Level	Height Relative to Observer Start End
Distance from Observer Start End	Direction from Observer Start End
Vertical Angle to Plume	Horizontal Angle to Plume

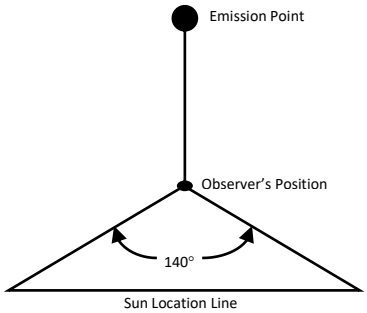
Describe Emissions Start End	
Emission Color Start End	If Water Droplet Plume Attached ☐ Detached ☐ NA ☐
Point in the Plume at which Opacity was Determined Start End	

Describe Plume Background Start End		
Background Color Start End	Sky Conditions Start End	
Wind Speed Start End	Wind Direction Start End	
Ambient Temperature Start End	Wet Bulb Temperature	RH Percent

Stack

Source Layout Sketch

Draw North Arrow



Additional Information

Observation Date				Start Time	End Time
Min	Sec 0	Sec 15	Sec 30	Sec 45	Comments
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
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26					
27					
28					
29					
30					

Observer's Name (print)	
Observer's Signature	Date
Organization	
Certified By	Date

Attachment 1: Opacity Form

Continued on VEO Form					

Attachment 2: Insignificant Emissions Units

In addition to categorically exempt IEUs, SPI listed in their latest AOP application several units and activities that qualify as IEUs on the basis of size, or that are fugitive only sources. These IEUs do need to be specifically listed in the AOP and are described in Table 7. ORCAA reviewed and concurs with SPI's IEU determinations.

TABLE A3. Insignificant Emissions Units Identified in Application

Insignificant Emission Unit ID#	Description	IEU Basis
IEU1	**Storage Vessels (Round House) -** Round House includes several waste oil storage tanks used for maintenance operations. The tanks are equipped with lids, not heated and are each less than two hundred sixty gallon capacity (35 cft).	WAC 173-401-533(2)(a)
IEU2	**Storage Vessels (Outside of Round House) -** Includes one diesel fuel tank used to store diesel fuel for vehicles. The tank is equipped with a lid and is less than 10,000 gallons capacity.	WAC 173-401-533(2)(c)
IEU3	**Fork Lift Trucks (Used throughout facility) -** Combustion source less than 5 MM Btu/hr. Exclusively using natural gas or propane.	WAC 173-401-532(2)(e)
IEU4	**Fork Lift Trucks (Used throughout facility) -** Combustion source less than 1 MM Btu/hr. Using kerosene, No. 1 or No. 2 fuel oil.	WAC 173-401-533(2)(g)
IEU5	**Welding** - SPI Shelton performs a variety of maintenance and repair activities on-site that involve metal fabrication and welding. Welding (Used in maintenance areas throughout Mill) consume less than one ton per day of welding rod.	WAC 173-401-533(2)(l)
IEU6	**Space and Hot Water Heaters -** Includes all space heaters and hot water heaters using natural gas, propane or kerosene and generating less than five million Btu/hr.	WAC 173-401-533(2)(r)
IEU7	**Storage vessels for dispensing inorganic salts (Powerhouse) -** Includes all tanks, vessels, and pumping equipment, with lids or other appropriate closure for storage or dispensing of aqueous solutions of inorganic salts, bases and acids described under WAC 173-401-533(2)(S). Includes vessels and pumping equipment for one caustic tank, one alkaline amine, and one brine tank.	WAC 173-401-533(2)(s)
IEU8	**Cold Cleaning Tank (Plywood plant):** cleaning solution is less than 1% VOC by weight.	WAC 173-401-533(2)(z)
IEU9	**Oil and grease separating tank (between Roundhouse and maintenance shop) -** Tank qualifies as NPDES permitted pond utilized solely for the purpose of settling suspended solids and skimming of oil and grease.	WAC 173-401-533(3)(d)
IEU10	**De-barkers, Hogs and Chippers** - SPI Shelton performs chipping and debarking activities on raw timber. These activities are deemed insignificant in accordance with WAC 173-401-532(112 and 113). Although de-barkers and hogs are categorically exempt and do not need to be listed in the AOP,	WAC 173-401-532(112 and 113)

Attachment 2: Insignificant Emissions Units

	SPI wanted them listed in the TSD anyways because they perform critical functions at the Mill	
IEU11	**Natural Gas Space Heaters (Throughout all plants) -** space heaters and hot water heaters use natural gas or propane and generate less 5 MMBtu/hr.	WAC 173-401-533(2)(r)
IEU12	**Hot Water Heaters (Throughout all plants) -** combustion source less than 5 MMBtu/hr. Exclusively using natural gas or propane.	WAC 173-401-533(2)(e)
IEU13	**Aerosol can painting operations (Throughout all plants) -** all emissions are fugitive.	WAC 173-401-530(1)(d)
IEU14	**Spray Coating of End Shield**	WAC 173-401-530(1)(a)

Table 7 Notes:

1. All IEUs identified in Table 7 are subject to only general applicable requirements in the AOP.
2. ORCAA has determined no additional monitoring, record keeping or reporting is required for any of the IEUs identified.
3. All IEUs identified in Table 7 were listed in SPI's last AOP renewal application.