

PROJECT REPORT
Weyerhaeuser NR Company > Weyerhaeuser Raymond

Title V Permit Renewal Application
Application for Renewal of Permit No. 04AOP387

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July 2012

Project 124801.0022

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TABLE OF CONTENTS

1. PERMIT RENEWAL INFORMATION	1-1
1.1. Renewal Application Overview	1-1
2. FACILITY CHANGES SINCE LAST TITLE V MODIFICATION	2-2
2.1. Emission Units	2-2
2.2. Insignificant Emission Units	2-2
2.3. Technical Support Document (TSD)	2-1
3. EMISSION CALCULATIONS	3-1
4. REGULATORY APPLICABILITY	4-1
4.1. State Applicability Analysis	4-1
4.1.1. Excess Emissions Reporting	4-1
4.1.2. Mandatory Greenhouse Gas (GHG) Reporting	4-1
4.2. Federal Applicability Analysis	4-2
4.2.1. NESHAP Applicability (40 CFR 63).....	4-2
4.2.2. Risk Management Plan (40 CFR 68).....	4-3
4.2.3. Mandatory GHG Reporting (40 CFR 98).....	4-3
5. COMPLIANCE DEMONSTRATION	5-1
6. COMPLIANCE ASSURANCE MONITORING	6-1
7. PERMIT SHIELD AND NON-APPLICABLE REQUIREMENTS	7-1
7.1. NESHAP Subpart DDDD – Plywood and Composite Wood Products	7-1
8. REQUESTED CHANGES TO THE TITLE V AIR OPERATING PERMIT	8-1
8.1. General Changes.....	8-1
8.2. Individually Identified Changes	8-1
APPENDIX A: REDLINED TITLE V OPERATING PERMIT NO. 04AOP387	A
APPENDIX B: REDLINED TECHNICAL SUPPORT DOCUMENT	B
APPENDIX C: POTENTIAL TO EMIT CALCULATIONS	C
APPENDIX D: ORCAA TITLE V PERMIT RENEWAL APPLICATION FORMS	D
APPENDIX E: CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS	E

LIST OF TABLES

Table 2-1. Additional Insignificant Emission Units	2-2
Table 8-1. Additional Insignificant Emission Units	8-6

1. PERMIT RENEWAL INFORMATION

Weyerhaeuser NR Company (Weyerhaeuser) owns and operates a softwood lumber mill in Raymond, Washington. The lumber mill is referred to in this application as Weyerhaeuser Raymond. The facility currently operates under Title V Operating Permit No. 04AOP387, which was issued by the Olympic Region Clean Air Agency (ORCAA) and expires on February 4, 2013. The permit was issued on February 4, 2008 per an initial application submitted to ORCAA by Weyerhaeuser in September 2005. This document serves as the application for the renewal of Weyerhaeuser's Title V permit for the Weyerhaeuser Raymond lumber mill.

1.1. RENEWAL APPLICATION OVERVIEW

This Title V Air Operating Permit renewal application contains the following sections.

- Section 1: Permit Renewal Information
- Section 2: Facility Changes Since Last Title V Modification
- Section 3: Emission Calculations
- Section 4: Regulatory Applicability
- Section 5: Compliance Demonstration
- Section 6: Compliance Assurance Monitoring
- Section 7: Permit Shield and Non-applicable Requirements
- Section 8: Requested Changes to the Title V Air Operating Permit

Several supporting documents and required application materials are included in the appendices to this permit renewal application, specifically:

- Appendix A: Redlined Title V Operating Permit No. 04AOP387
- Appendix B: Redlined Technical Support Document
- Appendix C: Potential to Emit Calculations
- Appendix D: ORCAA Title V Permit Renewal Application Forms
- Appendix E: Certification of Truth, Accuracy, and Completeness

In some cases, a prior submittal to ORCAA (e.g., the annual emission inventory) may include information requested in the Title V renewal application. Instructions to the ORCAA renewal application state that applicants may refer to that information rather than provide it in the application. Any submittal to which ORCAA is referred will become part of the renewal application. In places, Weyerhaeuser refers to prior submittals in this renewal application.

2. FACILITY CHANGES SINCE LAST TITLE V MODIFICATION

Only a single Notice of Construction (NOC) was submitted during the term of the current Title V Operating Permit No. 04AOP387. ORCAA issued Order of Approval 12NOI879 on March 28, 2012 to allow for the short-term operation of a portable air compressor.

Furthermore, the following changes have not occurred to the current Title V permit:

- Off-permit changes according to Washington Administrative Code (WAC) 173-401-724;
- Section 502(b)(10) changes according to WAC 173-401-722(2); and
- New sources or modifications that did not require an NOC.

2.1. EMISSION UNITS

There are no changes to the significant emission sources listed in Table A3.1 in Attachment 2 to Permit No. 04AOP387. However, note that under the Hog Fuel System heading in Table A3.1, Cyclone #8 is now in service and that Cyclone #15 is out of service. Cyclone #8, part of the Hog Fuel System (EU5), processes residuals stored in the Wellons Hog Fuel Boiler (EU1) bin. It transports its catch to the wet fuel belt and exhausts to the powerhouse baghouse.

2.2. INSIGNIFICANT EMISSION UNITS

Refer to the insignificant emission sources listed in Table 3.2 in Attachment 3 to Permit No. 04AOP387. No emission sources should be removed. Weyerhaeuser requests to add the insignificant emission sources presented in Table 2-1 to that list.

Table 2-1. Additional Insignificant Emission Units

Process #	Name of Insignificant Emission Unit	Basis for IEU Designation
Sawmill	Filing room heats a melting pot of babbit for saw blade repairs	WAC 173-401-532(15)
Maintenance	Personnel lift equipment uses electric batteries	WAC 173-401-532(77)

2.3. TECHNICAL SUPPORT DOCUMENT (TSD)

Weyerhaeuser requests that changes be made to the current TSD issued to Weyerhaeuser Raymond on February 4, 2008 to reflect operational changes at the facility. Specifically, Weyerhaeuser requests that changes in the current TSD be made to:

- Process descriptions;
- Emission unit summaries;
- Regulatory determinations; and
- The statement of basis.

A redlined version of the current TSD showing each requested change is provided in Appendix B.

3. EMISSION CALCULATIONS

ORCAA requires that the Title V renewal application contain several emission calculations including potential annual emissions, actual emissions for the prior year, and potential annual emissions without regard to control device. These calculations are described in the following paragraphs.

Potential annual emissions or “potential to emit” means the maximum capacity of a stationary source to emit air pollutants under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including restriction on hours of operation or on the type or amount of materials combusted, stored, or processed, shall be treated as part of its design if the limitation is federally enforceable. Refer to the PTE submitted with the 2004 Title V renewal application. Potential emissions have not changed since that time.

Actual emissions should reflect emissions of regulated pollutants for the most recent calendar year. Actual emissions in 2011 for each emission unit are included in Form C in the ORCAA AOP Renewal Application. ORCAA Title V permit renewal forms are included in Appendix D.

The potential to emit without regard to control device is required for CAM applicability. Refer to the compliance assurance monitoring (CAM) evaluation submitted with the 2004 Title V permit renewal application. CAM applicability for each emission unit has not changed since that time. Section 6 in this application further addresses CAM applicability.

Weyerhaeuser was not required to submit greenhouse gas (GHG) calculations in the prior Title V renewal application in 2004. Since the current Title V Operating Permit was issued, however, GHGs have become a regulated pollutant under federal air regulations. Additionally, mandatory GHG reporting requirements were promulgated in Washington State. Appendix C in this renewal application presents GHG potential to emit calculations. Actual emissions of GHG are included in Form C.

4. REGULATORY APPLICABILITY

This section addresses new applicable (or inapplicable) requirements that have been promulgated since the last renewal of Weyerhaeuser Raymond's Title V Operating Permit No. 04AOP387 on February 4, 2008 and that are not incorporated therein. This section also addresses the applicability of several existing rules to which the facility may or may not be subject.

Form H in the ORCAA AOP Renewal Application allows for the facility to list each new requirement that might apply to the facility, the emission unit it might apply to, and the applicability determination. This section further details the potential applicability of such regulations.

Local regulations written by ORCAA that may apply to Weyerhaeuser Raymond have not appreciably changed since the last Title V renewal application for Weyerhaeuser Raymond so the following sections focus on the applicability of federal and state regulations. Weyerhaeuser Raymond will continue to comply with all applicable requirements.

4.1. STATE APPLICABILITY ANALYSIS

This section discusses the applicability or non-applicability of state regulations promulgated since the issuance of the current Title V permit.

4.1.1. Excess Emissions Reporting

As of the submittal date of this Title V renewal application (i.e., July 2012), excess emission reporting is codified under WAC 173-400-107. This rule is in effect until the effective date of EPA's incorporation of the entirety of WAC 173-400-108 and 173-400-109 into the Washington state implementation plan (SIP) as replacement for WAC 173-400-107.

Because EPA has not approved the new regulations for excess emissions reporting in WAC 173-400-108 and 173-400-109, provisions for excess emissions reporting in Condition 2.22, 2.23, and 8.5c of the current Title V permit, which reference WAC 173-400-107, do not necessitate an update.

4.1.2. Mandatory Greenhouse Gas (GHG) Reporting

Beginning January 1, 2011, owners and operators of certain facilities in Washington State that directly emit GHGs are required to report GHG emissions. WAC 173-441 establishes mandatory GHG reporting requirements for owners and operators of applicable facilities. Applicable facilities are those that emit 10,000 metric tons of CO₂e per calendar year in total GHG emissions from all applicable source categories listed in WAC 173-441-120. Emissions from biogenic sources must be included in the CO₂e total.

GHG emissions are calculated according to WAC 173-441-030(b) for comparison to the reporting threshold. In 2011, emissions of GHG from Weyerhaeuser Raymond totaled 59,291 metric tons CO₂e. The facility is thus subject to mandatory state GHG reporting codified in WAC 173-441 and will comply with the provisions therein as discussed in the following paragraphs.

General monitoring, reporting, recordkeeping, and verification requirements to which applicable facilities are subject are codified in WAC 173-441-050.

Emissions of CO₂ from biogenic sources are currently deferred under federal GHG reporting¹; as such, the federally-regulated CO₂e total from Weyerhaeuser Raymond does not exceed the federal reporting threshold. Pursuant to WAC 173-441-050(2)(ii), Weyerhaeuser must then submit an annual GHG report no later than October 31st of each calendar year for GHG emissions in the previous calendar year.

Weyerhaeuser will submit with each annual GHG report the required contents listed in WAC 173-441-050(3), will keep records as established in WAC 173-441-050(6), and will keep a written GHG monitoring plan as required under WAC 173-441-050(6)(e).

4.2. FEDERAL APPLICABILITY ANALYSIS

The following sections discuss the applicability or non-applicability of federal regulations promulgated since the issuance of the current Title V permit.

4.2.1. NESHAP Applicability (40 CFR 63)

The following sections discuss the applicability or non-applicability of National Emission Standards for Emissions of Hazardous Air Pollutants (NESHAP) rules promulgated since the issuance of the current Title V Operating permit and of existing NESHAP rules to which the facility may be subject.

4.2.1.1. NESHAP QQQQ - Surface Coating of Wood Building Products

Subpart QQQQ applies to surface coating of wood building products, which means the application of coatings using, for example, roll coaters or curtain coaters in the finishing or laminating of any wood building product that contains more than 50 percent by weight wood or wood fiber excluding the weight of any glass components, and is used in the construction, either interior or exterior, of a residential, commercial, or institutional building.

Coating is defined in §63.4781 as:

“...a material applied to a substrate for decorative, protective, or functional purposes. Such materials include, but are not limited to, paints, sealants, caulks, inks, adhesives, and maskants. Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances are not considered coatings for the purposes of this subpart.”

Subpart QQQQ does not apply to facilities that use less than 4,170 liters (1,100 gallons) per year of coatings in the source category.

Furthermore, Subpart QQQQ does not apply to surface coating and other operations listed in §63.4681(c), among which is painting of company logo information on plywood or reconstituted wood products. Employees

¹ Pursuant to 40 CFR 98.2(b)(2), for comparison to the 25,000 metric ton CO₂e per year emission threshold, exclude carbon dioxide emissions from the combustion of biomass, but include emissions of CH₄ and N₂O from biomass combustion.

at Weyerhaeuser Raymond use stencils and/or paint to mark lumber bundles with company logo information so the facility is not subject to Subpart QQQQ.

4.2.1.2. NESHAP DDDDD - Industrial, Commercial, and Institutional Boilers and Process Heaters

Subpart DDDDD (commonly referred to as the Boiler MACT) applies to industrial, commercial, and institutional boilers and process heaters at major sources of HAPs. The Wellons Hog Fuel Boiler, designated EU1, is an affected source under this subpart and is subject to the applicable provisions therein.

EPA has proposed a revised version of the Boiler MACT that is expected to be finalized sometime in 2012. The new rule may differ significantly from the existing version of the rule. Weyerhaeuser will comply with the applicable requirements of Subpart DDDDD when those requirements become effective.

4.2.1.3. NESHAP HHHHH - Miscellaneous Coating Manufacturing

Subpart HHHHH applies to miscellaneous coating manufacturing operations defined in §63.7985(b) that are used to manufacture coatings. Coating is defined in §63.8105(g) as:

"...a material such as paint, ink, or adhesive that is intended to be applied to a substrate and consists of a mixture of resins, pigments, solvents, and/or other additives, where the material is produced by a manufacturing operation where materials are blended, mixed, diluted, or otherwise formulated."

Employees at Weyerhaeuser Raymond use stencils and/or paint to mark lumber bundles, but the facility does not use manufacturing operations in §63.7985(b), or any manufacturing operations, to manufacture these marking materials. Therefore, Weyerhaeuser Raymond is not subject to Subpart HHHHH.

4.2.2. Risk Management Plan (40 CFR 68)

Weyerhaeuser Raymond does not store any listed hazardous substances under 40 CFR 68 above a threshold quantity. As noted in Form D in the ORCAA AOP Renewal Application, the facility is therefore not subject to the accidental release prevention regulations in 40 CFR 68.

4.2.3. Mandatory GHG Reporting (40 CFR 98)

Federal mandatory GHG reporting, codified in 40 CFR 98 is not an applicable requirement for Title V purposes, as described in the preamble to the Mandatory Reporting Rule². The definition of "applicable requirement" in 40 CFR 70.2 and 71.2 does not include the monitoring rule in 40 CFR 98, which is promulgated under CAA sections 114(a)(1) and 208.

² Mandatory Reporting of Greenhouse Gases; Final Rule, 74 Federal Register 56287-56288 (October 30, 2009).

5. COMPLIANCE DEMONSTRATION

Weyerhaeuser Raymond is in compliance with all of the conditions in the current Title V permit. Refer to the revised 2011 Annual Compliance Certification (ACC) report submitted to ORCAA on May 14, 2012. The revised ACC provides updates and supersedes the original ACC submitted on January 30, 2011.

The ACC serves several purposes: it certifies the status of compliance with respect to all permit conditions in the current Title V permit from January 1, 2011 to December 31, 2011; it certifies whether compliance with each condition was continuous or intermittent; and it identifies the methods used for determining compliance.

6. COMPLIANCE ASSURANCE MONITORING

CAM regulations established in 40 CFR 64 require facilities to prepare and submit monitoring plans for subject emission units with the initial or renewal Title V operating permit application.

Under the general applicability criteria, CAM applies only to emission units with: (1) pre-controlled emissions greater than the Title V major source threshold level; and that (2) use a control device to comply with a federally enforceable requirement (i.e., emission limit).

CAM plans provide and assure on-going compliance with emission limits. For a subject unit using a control device whose post-controlled emissions also exceed the major source threshold, submission of a CAM plan is required with the initial Title V operating permit application. For a subject unit whose post-control emissions are less than the major source threshold, submission of a CAM plan is not required until the first Title V permit renewal application.

CAM applies to emission units routed to a control device that have applicable standards for a regulated pollutant under Title V or a standard that applies to a "surrogate" for that pollutant (e.g., visible emissions). The Wellons Hog Fuel Boiler (EU1) has a pre-control potential to emit of greater than 100 tons per year of carbon dioxide (CO), nitrogen oxides (NO_x), and particulate matter with a diameter of less than ten microns (PM₁₀) and is subject to emissions limits for all three pollutants. The Wellons Hog Fuel Boiler does not use a control device to comply with the CO and NO_x limits, but uses an electrostatic precipitator (ESP) to control PM₁₀; therefore, CAM applies to the boiler for PM₁₀. Refer to the CAM evaluation submitted with the 2004 Title V renewal application. CAM applicability for EU1 has not changed since that time.

CAM does not apply to any other units at Weyerhaeuser Raymond.

7. PERMIT SHIELD AND NON-APPLICABLE REQUIREMENTS

WAC 173-401-640 *Permit Shield* defines the permit shield provision, whereby the permitting authority is empowered to provide that compliance with a Title V air operating permit shall be deemed in compliance with all other applicable provisions of the Clean Air Act. A provision may be included in the major source operating permit stating that compliance with the conditions of the major source operating permit shall be deemed compliance with all applicable requirements (as of the date of permit issuance) provided: (1) such applicable requirements are identified and included in the permit; (2) ORCAA determines in writing that other requirements specifically identified are not applicable to the source; and (3) the permit includes the determination or concise summary thereof.

Weyerhaeuser requests that the permit shield be extended to cover the inapplicable provisions of the following rules.

7.1. NESHAP SUBPART DDDD - PLYWOOD AND COMPOSITE WOOD PRODUCTS

Subpart DDDD applies to plywood and composite wood products (PCWP) manufacturing facilities located at a major source of HAP emissions. PCWP facilities include lumber kilns, of which Weyerhaeuser Raymond has eight. Weyerhaeuser Raymond is subject to Subpart DDDD only to the extent that the rule applies to lumber kilns.

Pursuant to §63.2252, for process units not subject to the compliance options or work practice requirements of Subpart DDDD (including, but limited to, lumber kilns), operators are not required to comply with the compliance options, work practice requirements, performance testing, monitoring, SSM plans, and recordkeeping or reporting requirements of Subpart DDDD, or any other requirements in Subpart A to Part 63, except for the initial notification requirements in §63.9(b).

The only requirements to which Weyerhaeuser Raymond is subject are the initial notification requirements in §63.9(b). These requirements were met by Weyerhaeuser during the initial compliance demonstration prior to September 28, 2004. There are no ongoing requirements in Subpart DDDD to which the facility is subject or with which Weyerhaeuser must demonstrate compliance.

Weyerhaeuser requests that the renewed permit extend the permit shield to cover the non-applicability of all requirements in Subpart DDDD, except for the initial notification requirement in §63.9(b).

8. REQUESTED CHANGES TO THE TITLE V AIR OPERATING PERMIT

Weyerhaeuser requests the following changes be made to the current Title V Operating Permit No. 04AOP387. General changes, minor updates, and individually identified changes described in detail below have been made in the redlined version of the current Title V permit provided in Appendix A.

8.1. GENERAL CHANGES

Section 8.2 identifies changes to the current Title V permit requested by Weyerhaeuser. These changes are also included in the attached redlined version of the permit. In addition to the changes described in Section 8.2, a number of other minor changes (e.g., changes to local and state agency regulation references, spelling corrections, font changes, etc.) are also identified in the redlined version of the permit but are not addressed individually in this section.

8.2. INDIVIDUALLY IDENTIFIED CHANGES

Form I in the ORCAA AOP Renewal Application allows for the applicant to request changes to the current Title V permit. The individual changes identified in this section are responsive to Form I in the ORCAA AOP Renewal Application. This section presents for each condition for which Weyerhaeuser would like to request a change, by order of appearance: the permit condition or table, the requested change, and the reason for the change.

Section 1 Regulatory Basis

Requested Change: Weyerhaeuser requests to change "Weyerhaeuser Company" to "Weyerhaeuser NR Company."

Reason: The legal entity under which manufacturing facilities operate is Weyerhaeuser NR Company.

Condition 2.19

Requested change: Weyerhaeuser requests to change the regulatory reference to Condition 2.19 from ORCAA 1.3.01(e) to ORCAA 1.5(e).

Reason: ORCAA has changed the structure and/or organization of Rule 1 since the last Title V renewal. Included among these changes is the reference to ORCAA 1.5(e). ORCAA regulations were updated slightly since the issuance of the current Title V permit on February 4, 2008. This is also the case for WAC regulations. Rather than identifying each individual change in this section of the renewal application, changes to regulatory references are made to the redlined version of the Title V permit.

Condition 2.22

Requested change: Weyerhaeuser requests to add WAC references to 173-400-108 and 173-400-109 after the reference to WAC 173-400-107 so that the modified sentence reads:

"This provision is in addition to the affirmative defense for unavoidable excess emissions found in WAC 173-400-107, and eventually WAC 173-400-108 and WAC 173-400-109."

Reason: WAC 173-400-108 and WAC 173-400-109 take effect on the effective date of EPA's incorporation of the entirety of these rules into the Washington SIP as replacement for WAC 173-400-

107. EPA's incorporation of these rules is expected to occur during the effective dates of the renewed Title V permit.

Condition 2.23

Requested change: Weyerhaeuser requests to add WAC references to 173-400-108 and 173-400-109 after the reference to WAC 173-400-107 so that the modified sentence reads:

"Excess emissions due to startup, shutdown, scheduled maintenance or upset conditions that are determined by ORCAA to be unavoidable under the procedures and criteria in WAC 173-400-107, and eventually WAC 173-400-108 and WAC 173-400-109, and Rule 8.7 of ORCAA Regulations, shall be excused and not subject to penalty"

Reason: WAC 173-400-108 and WAC 173-400-109 take effect on the effective date of EPA's incorporation of the entirety of these rules into the Washington SIP as replacement for WAC 173-400-107. EPA's incorporation of these rules is expected to occur during the effective dates of the renewed Title V permit.

Condition 3.5

Requested Change: Weyerhaeuser request to change the heading "Temporary Sources" to "Temporary Portable Sources."

Reason: ORCAA Rule 6.1.7 has been re-named.

Table 4.1

Requested change: Weyerhaeuser requests to change the title of the final column in Table 4.1 from "Required Monitoring" to "Additional Monitoring Provisions Pursuant to WAC 173-401-615(1)(b)."

Reason: Table 5.2, Table 5.3, and Table 5.4 use the title "Additional Monitoring Provisions Pursuant to WAC 173-401-615(1)(b)". Weyerhaeuser proposes to change the title in Table 4.1 to maintain consistency with other tables in the Title V permit.

Condition 4.13

Requested change: Weyerhaeuser requests to change the applicable condition listed under required monitoring from Condition 6.9 to Condition 6.8.

Reason: Condition 4.13 establishes general particulate standards for combustion units. Condition 6.9 references CO monitoring for EU1 so this is an incorrect reference. Condition 6.8 references required particulate testing for EU1.

Condition 4.14

Requested change: Weyerhaeuser requests to change the applicable condition listed under required monitoring from Condition 6.9 to Condition 6.8.

Reason: Condition 4.14 establishes general emission standards for combustion units, specifically for particulate matter. Condition 6.9 references CO monitoring for EU1 so this is an incorrect reference. Condition 6.8 references required particulate testing for EU1.

Table 5.1

Requested change: Weyerhaeuser requests to change the title of the final column in Table 5.1 from “Required Monitoring” to “Additional Monitoring Provisions Pursuant to WAC 173-401-615(1)(b).”

Reason: Table 5.2, Table 5.3, and Table 5.4 use the title “Additional Monitoring Provisions Pursuant to WAC 173-401-615(1)(b)”. Weyerhaeuser proposes to change the title in Table 5.1 to maintain consistency with other tables in the Title V permit.

Condition 5.1a

Requested change: Weyerhaeuser requests to remove EPA Method 6, 6A, 6B, and 6C as applicable reference methods.

Reason: The Reference Method should be “Calculation based on diesel sulfur content.” EU1 burns very small quantities of low-sulfur diesel fuel during boiler start-up. Monitoring Condition 6.6 provides the method for demonstrating compliance with the WAC 173-400-040(7) limitation.

Condition 5.1d

Requested change: Weyerhaeuser requests to correct the particulate emission limit of EU1 from 0.02 gr/dscf to 0.2 gr/dscf.

Reason: This change corrects a typographical error in the Title V permit.

Condition 5.1o

Requested change: Weyerhaeuser requests to change the reference to Condition 6.7 in the applicable requirement description to Condition 6.13 and to remove Condition 6.7 as required monitoring.

Reason: Condition 6.7 establishes monitoring requirements for control equipment and systems for EU3, EU4, and EU5; it does not apply to the EU1. Condition 6.13 establishes CAM requirements for EU1.

Condition 5.1p

Requested change: Weyerhaeuser requests to change reference to Condition 6.7 in the applicable requirement description and in the required monitoring to Condition 6.13.

Reason: Condition 6.7 establishes monitoring requirements for control equipment and systems for EU3, EU4, and EU5; it does not apply to the EU1. Condition 6.13 establishes CAM requirements for EU1.

Condition 5.2a

Requested change: Weyerhaeuser requests to change the title of the applicable requirement description from “General Particulate Standards for Process and Combustion Units” to “General Standards for Maximum Particulate Matter.”

Reason: Weyerhaeuser requests this change to maintain consistency with the title of ORCAA Rule 8.3. Weyerhaeuser requests this change several times in the redlined version of the Title V permit, but only makes note of it in the renewal application this one time.

Condition 5.2f

Requested change: Weyerhaeuser requests to remove Condition 5.2f from the permit.

Reason: Weyerhaeuser Raymond is subject to 40 CFR 63 Subpart DDDD. The only requirements therein to which the facility is subject are the initial notification requirements in §63.9(b). These requirements were met by Weyerhaeuser during the initial compliance demonstration prior to September 28, 2004. There are no ongoing requirements in Subpart DDDD to which the facility is subject or with which Weyerhaeuser must demonstrate compliance. Table 9.1 provides an explanation of the inapplicable requirements in Subpart DDDD.

Condition 5.2g

Requested change: Weyerhaeuser requests to add Condition 5.2g to Table 5.2. With the removal of Condition 5.2f (noted in the preceding requested change), this condition would become Condition 5.2f in the new Title V permit. Condition 5.2g addresses 40 CFR 63 Subpart DDDDD, NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters. Weyerhaeuser recommends adding the following verbiage to the applicable requirement description:

“The permittee shall comply with the applicable requirements of 40 CFR Part 63 Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.”

Reason: Weyerhaeuser proposes general language in the applicable requirement description because EPA has not released the revised version of Subpart DDDDD. A new version of this rule is expected to be issued later in 2012.

Condition 5.3c

Requested change: Weyerhaeuser requests to change Condition 6.10 in the additional monitoring provisions to Condition 6.11.

Reason: Condition 5.3e establishes a particulate limit for baghouse #1 (Clark baghouse). Condition 6.10 establishes NO_x monitoring requirements for EU1; Condition 6.11 establishes general source testing procedures.

Condition 5.3i

Requested change: Weyerhaeuser requests to change the reference method from “not applicable” to “none.”

Reason: Condition 5.3i establishes the requirement to implement an operations and maintenance plan. The only requirement is that Weyerhaeuser have a plan. Additional monitoring or reference methods are not required.

Condition 6.2b

Requested change: Weyerhaeuser requests to replace the phrase “any of the operating specifications prescribed under condition 6.13” with “the target operating ranges in Table 6.2” so that the condition reads:

“When an emission unit fails to meet the target operating ranges in Table 6.2 and corrections cannot be made within 24 hours.”

Reason: This proposed change explicitly references the target operating ranges in Table 6.2. The requested change adds specificity and clarity to the condition. Note also that Weyerhaeuser requests to add the specific target operating range to Table 6.2 (this is requested below).

Condition 6.3a

Requested change: Weyerhaeuser requests to add the parenthetical phrase “(that is, 24 hours plus 1 hour after an operating parameter or opacity event described in Condition 6.2)” so that the condition reads:

“Certified opacity readings shall be initiated as soon as possible, but not later than 1 hour after the requirement to verify compliance is triggered (that is, 24 hours plus 1 hour after an operating parameter or opacity event described in Condition 6.2) unless the subject emission unit is not operating, or lack of daylight or weather conditions prevent conducting the testing.”

Reason: The proposed change adds clarity to when the certified opacity readings must be initiated.

Table 6.2

Requested change: Weyerhaeuser requests to replace the qualitative description of the target operating range for EU1 ESP voltage with the numerical target operating range. The operating range for Cell-TR1 is 30-55 kV and the operating range for Cell-TR2 is 35-55 kV.

Reason: This change explicitly defines the target operating range for the EU1 ESP voltage.

Condition 8.4c

Requested change: Weyerhaeuser requests to change the reference to Condition 6.8 to Condition 6.13.

Reason: Condition 8.4c attempts to reference the statistical summary of the operation of emissions units subject to CAM, which is discussed in Condition 6.13. Condition 6.8 is an incorrect reference.

Condition 8.4d

Requested change: Weyerhaeuser requests to change the reference to Condition 6.8 to Condition 6.13.

Reason: Condition 8.4d attempts to reference the definition of “excursion,” which is defined in Condition 6.13d. Condition 6.8 is an incorrect reference.

Condition 8.4g

Requested change: Weyerhaeuser requests to change the reference to Condition 6.8e to Condition 6.13e.

Reason: Condition 8.4g attempts to reference the Quality Improvement Plan (QIP), which is defined in Condition 6.13e. Condition 6.8e is an incorrect reference.

Table 9.1

Requested change: Weyerhaeuser requests to add to Table 9.1 the inapplicable requirements of 40 CFR 63 Subpart DDDD.

Reason: Weyerhaeuser Raymond is subject to 40 CFR 63 Subpart DDDD. The only requirements therein to which the facility is subject are the initial notification requirements in §63.9(b). These requirements were met by Weyerhaeuser during the initial compliance demonstration prior to September 28, 2004. There are no ongoing requirements in Subpart DDDD to which the facility is subject or to which Weyerhaeuser must demonstrate compliance.

Table A3.1

Requested change: Weyerhaeuser requests to change the description of Cyclone #8 from “No name” to “Planer Cyclone,” and to remove the “out of service” designation. Weyerhaeuser requests also to designate Cyclone #15 as “out of service.”

Reason: Cyclone #8, referred to as the Planer Cyclone, is in service and Cyclone #15 is out of service.

Table 3.2

Requested change: Weyerhaeuser requests to add the insignificant emission units presented in Table 8-1 below to the list of insignificant emission units in Table 3-2 in the Title V operating permit.

Table 8-1. Additional Insignificant Emission Units

Process #	Name of Insignificant Emission Unit	Basis for IEU Designation
Sawmill	Filing room heats a melting pot of babbitt for saw blade repairs	WAC 173-401-532(15)
Maintenance	Personnel lift equipment uses electric batteries	WAC 173-401-532(77)

Reason: In drafting the Title V renewal application, Weyerhaeuser identified these additional insignificant emission units.

APPENDIX A: REDLINED TITLE V OPERATING PERMIT NO. 04AOP387



Air Operating Permit for Weyerhaeuser Raymond

Olympic Region Clean Air Agency
2940 B Limited Lane NW
Olympia, WA 98502
(360) 586-1044 or 1-800-422-5623

ISSUED IN ACCORDANCE WITH:
40 CFR Part 70, Chapter 70.94 RCW, and Chapter 173-401 WAC

PERMIT NO: 04AOP387

ISSUANCE DATE: February 4, 2008

EXPIRATION DATE: February 4, 2013

PERMITTEE & MAILING ADDRESS: Weyerhaeuser NR Raymond Lumber Mill
51 Ellis St
Raymond, WA 98577

FACILITY LOCATION: 51 Ellis St
Raymond, WA 98577

FACILITY DESCRIPTION: Lumber Manufacturer

ORCAA FILE #: 475

PRIMARY SIC: 2421

REVIEWED BY: _____
Mark V. Goodin

APPROVED BY: _____
Richard A. Stedman Fran McNair

TABLE OF CONTENTS

Section 1.	Regulatory Basis.....	1
Section 2.	Standard Terms and Conditions.....	2
Section 3.	Actions Requiring Prior Approval.....	7
Section 4.	Facility-wide and General Applicable Requirements.....	8
Section 5.	Emission Unit Specific Requirements.....	12
Section 6.	Compliance Monitoring Conditions.....	25
Section 7.	Recordkeeping.....	31
Section 8.	Reporting.....	34
Section 9.	Permit Shield.....	37
Attachment 1	Units and Abbreviations	
Attachment 2	Inventory of Emission Units	
Attachment 3	Inventory of Insignificant Emissions Units	

1. Air Operating Permit Regulatory Basis

Pursuant to Chapter 173-401 Washington Administrative Code (WAC), Weyerhaeuser NR Company Raymond Lumbermill (Weyerhaeuser Raymond) is authorized to operate the Weyerhaeuser Raymond facility located at 51 Ellis St in Raymond, Washington, in accordance with the terms and conditions listed in this permit.

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

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

Unless otherwise stated, terms used in the conditions of this permit shall be defined consistent with their definitions from the corresponding referenced regulations. If not defined in the referenced regulations, terms shall be defined consistent with the definitions contained in Chapter 70.94 RCW, WAC 173-401-200, WAC 173-400-200, Article 1 and ORCAA Regulation 1. Terms not defined in this permit or by applicable regulation shall be defined consistent with the Merriam-Webster's Collegiate Dictionary, Eleventh Edition copyright © 2003 by Merriam-Webster Inc.

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

2. STANDARD TERMS AND CONDITIONS

Standard terms and conditions are administrative and other requirements that have no ongoing compliance monitoring requirements. The permittee must comply with the requirements listed below, and must certify compliance annually. Unless the text of the term is specifically identified to be directly enforceable, the language of the cited regulation takes precedence.

2.1 Duty to comply. The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation of Chapter 70.94 RCW and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application. [WAC 173-401-620(2)(a)]

2.2 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 the Administrator of the U.S. EPA in care of U.S. EPA Region 10 along with a claim of confidentiality. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70.94.205. [WAC 173-401-620(2)(e)]

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

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

2.5 Annual Fees. The permittee shall pay an annual permit fee as a condition of this permit in accordance with ORCAA's fee schedule contained in ORCAA Regulations Rule 3.2. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in Chapter 70.94 RCW. [ORCAA 3.2; WAC 173-401-620(2)(f)]

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

2.7 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.
- 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 173-401-700 through WAC 173-401-820.

[WAC 173-401-625]

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

2.9 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. This provision for appeal in this section is separate from and additional to any federal rights to petition and review under §505(b) of the FCAA. [WAC 173-401-620(2)(i)]

2.10 Permit Renewal and Expiration. This permit is issued for a fixed term of five years from date of issuance. Permit expiration terminates the permittee's right to operate the source unless a complete renewal application has been submitted to ORCAA no later than six months prior to the expiration date of this permit. This permit and all conditions contained therein, including any permit shield provided under WAC 173-401-640, shall not expire until the renewal permit has been issued or denied if a complete application has been submitted by the renewal application due date. 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 complete application has been submitted by the renewal application due date. This protection shall cease to apply if, subsequent to a completeness determination, the applicant fails to submit by the deadline specified in writing by ORCAA any additional information identified as being needed to process the application. [WAC 173-401-705; WAC 173-401-610; WAC 173-401-620(2)(j)]

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

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

- a) Additional requirements become applicable to the source with a remaining permit term of 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 that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
- d) ORCAA or the Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

[WAC 173-401-730]

2.13 Changes not Requiring Permit Revision/Off Permit Changes. The permittee may make the changes described in WAC 173-401-722 and WAC 173-401-724 without revising this permit, provided that the changes satisfy the criteria set forth in those sections. [WAC 173-401-722; WAC 173-401-724]

2.14 Permit Revisions. This permit may be revised as provided in WAC 173-401-720 (administrative permit amendments) and WAC 173-401-725 (permit modifications). [WAC 173-401-720; WAC 173-401-725]

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

2.16 Compliance Maintenance. The permittee shall maintain compliance with all applicable requirements 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. [WAC 173-401-630(3)]

2.17 False or Misleading Statements. No person shall willfully make a false or misleading statement to ORCAA as to any matter within the jurisdiction of ORCAA. [ORCAA 7.2]

2.18 Inspection and Entry.

- a) Upon presentation of appropriate credentials, the permittee shall allow a representative from ORCAA or an authorized representative to perform the following:
 - i) Enter upon the premises where a Chapter 401 source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - ii) Have access to and copy at reasonable times any records that must be kept under the conditions of this permit;
 - iii) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - iv) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements.
- b) Nothing in this condition or permit shall limit the ability of EPA to inspect or enter the premises of the permittee under Section 114 or other provisions of the Clean Air Act.

[WAC 173-401-630(2)]

2.19 Access for Inspection. No person shall refuse entry or access to an ORCAA representative who requests entry for the purpose of inspection, and who presents appropriate credentials; nor shall any person obstruct, hamper or interfere with any such inspection. [Local Only: ORCAA 1.53.04(e)]

2.20 Source Testing. To demonstrate compliance, ecology or the authority may conduct or require that a test be conducted of the source in accordance with the following conditions:

- a) **Methods.** using approved EPA methods from 40 CFR parts 51, 60, 61 and 63 (in effect on

February 20, 2001), or approved procedures contained in “*Source Test Manual – Procedures for Compliance Testing*,” state of Washington, department of ecology, as of July 12, 1990, on file at ecology. The operator of the source may be required to provide the necessary platform and sampling ports for ecology personnel or others to perform a test of an emissions unit. Ecology shall be allowed to obtain a sample from any emissions unit. The operator of the source shall be given an opportunity to observe the sampling and to obtain a sample at the same time. [WAC 173-400-105(4)]

- b) **Appropriate Testing Facilities.** When requested by ORCAA, the permittee is required to provide an appropriate source testing platform and sampling ports. [Local Only: ORCAA 1.5(j)]

[Specific to each subpart: a) WAC 173-400-105(4); b) ORCAA 1.5(j)]

2.21 Credible Evidence. For purposes of submitting compliance certifications or establishing whether or not a person 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 applicable requirements if the appropriate performance or compliance test or procedure had been performed. [40 CFR 51.212; 40 CFR 52.12; 40 CFR 52.33; 40 CFR 60.11; 40 CFR 61.12]

2.22 Emergency as Affirmative Defense. An emergency, as defined in WAC 173-401-645(1), constitutes an affirmative defense to an action brought for non-compliance with a technology-based emission limitation provided the criteria and procedures of WAC 173-401-645(3) are met. This provision is in addition to the affirmative defense for unavoidable excess emissions found in WAC 173-400-107, and eventually WAC 173-400-108 and WAC 173-400-109. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that demonstrates:

- a) An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b) The permitted facility was at the time being properly operated;
- c) During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- d) The permittee submitted notice of the emergency to the permitting authority within two working days of the time when emission limitations were exceeded due to the emergency or shorter periods of time specified in an applicable requirement. This notice fulfills the requirement of WAC 173-401-615(3)(b) unless the excess emissions represent a potential threat to human health or safety. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

[WAC 173-401-645(2); ~~WAC 173-401-645(5)~~]

2.23 Unavoidable Excess Emissions Excused. Excess emissions due to startup, shutdown, scheduled maintenance or upset conditions that are determined by ORCAA to be unavoidable under the procedures and criteria in WAC 173-400-107, and eventually WAC 173-400-108 and WAC 173-400-109, and Rule 8.7 of ORCAA Regulations, shall be excused and not subject to penalty. The permittee shall have the burden of proving to ORCAA that excess emissions were unavoidable. Excess emissions may qualify for consideration as unavoidable excess emissions provided the permittee includes in the permit deviation report required by Condition 8.5(c) of this permit, information that demonstrates:-

- a) The event was not caused by poor or inadequate design, operation, maintenance, or any

other reasonably preventable condition;

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

[WAC 173-400-107; WAC 173-400-108; WAC 173-400-109; ORCAA 8.7]

3. ACTIONS REQUIRING PRIOR APPROVAL

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

[Local Only: ORCAA 6.1]

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

[Local Only: ORCAA 6.1]

3.3 Demolition and Asbestos Projects. The permittee shall comply with the notification and approval requirements in Rule 6.3 of ORCAA's Regulations prior to commencing any asbestos or demolition project at the facility as defined in Rule 6.3.1 of the Regulations.

[Local Only: ORCAA 6.3.2]

3.4 Demolition and Renovation Projects. The permittee shall comply with the notification requirements in 40 CFR 61.145 (b) prior to commencing any renovation or demolition activities at the facility as defined in 40 CFR 61.141.

[40 CFR 61.145(b)]

3.5 Temporary Portable Sources. The permittee may operate temporary portable air contaminant sources at ~~temporary~~ locations within the facility subject to this permit provided that the permittee has complied with the requirements for temporary portable sources under ORCAA Regulations Rule 6.1(c)(1) or Rule 6.1.1 and Rule 6.1.7.

[ORCAA 6.1(c)(1), ORCAA 6.1.1, ORCAA 6.1.7; WAC 173-401-635]

4. Facility-Wide and General Applicable Requirements

The following facility-wide and general applicable requirements apply to all sources of emissions throughout the facility including emission units (EUs), area sources, and insignificant emission units (IEUs).

Table 4.1 – Facility-Wide and General Applicable Requirements

#	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Additional Monitoring Provisions Pursuant to WAC 173-401-615(1)(b) Required Monitoring
4.1	40 CFR 61.145(b); ORCAA 6.3.2 (local only)	Demolition and Renovation Projects. The permittee shall conduct all renovation, demolition and asbestos projects in accordance with applicable asbestos control standards and requirements in Rule 6.3 of ORCAA Regulations, 40 CFR § 61.145 and 40 CFR §61.150.	None	None
4.2	40 CFR 82 Subpart F	Stratospheric Ozone. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction.	None	None
4.3	WAC 173-400-040(5); ORCAA 7.6 (local only)	Emissions Detrimental to Persons or Property. No person shall cause or permit the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business.	None	6.4
4.4	WAC 173-400-040(23); ORCAA 8.3(e) (local only)	Fallout. No person shall cause or permit the emission of particulate matter from any source to be deposited beyond the property under direct control of the owner(s) or operator(s) of the source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited.	None	6.4
4.5	WAC 173-400-040(45) (state only); ORCAA 8.5(a) (local only)	Odors. Any person who shall cause or allow the generation of any odor from any source which may unreasonably interfere with any other property owner's use and enjoyment of his or her property must use recognized good practice and procedures to reduce these odors to a reasonable minimum.	None	6.4
4.6	ORCAA 8.5(c) (local only)	Odors. No person shall cause or allow the emission or generation of any odor from any source that unreasonably interferes with another person's use and enjoyment of their property.	None	6.4

Table 4.1 - Facility-wide and General Applicable Requirements (continued)

#	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Additional Monitoring Provisions Pursuant to WAC 173-401-615(1)(b) Required Monitoring
4.7	WAC 173-400-040(34)(a)	<p>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:</p> <p>a) If located in an attainment area and not impacting any non-attainment area, shall take reasonable precautions to prevent release of air contaminants from the operation.</p>	None	6.5
4.8	WAC 173-400-040(89)(a); ORCAA 8.3(c) (local only)	<p>Fugitive Dust Control. Reasonable and/or appropriate precautions shall be taken to prevent fugitive particulate material from becoming airborne;</p> <p>a) When handling, loading, unloading, transporting, or storing particulate material, or,</p> <p>b) When constructing, altering, repairing or demolishing a building, or its appurtenance, or a road; or,</p> <p>c) From an untreated open area.</p> <p>For the purpose of this requirement, fugitive particulate means particulate material which is generated incidental to an operation, process or procedure and is emitted into the open air from points other than an opening designed for emissions such as a stack or vent.</p>	None	6.5
4.9	WAC 173-400-040(78); ORCAA 7.5 (local only)	<p>Concealment and Masking. Prohibits the installation or use of any device or use of any method that conceals or masks an emission of an air contaminant which would otherwise violate any provision of WAC 173-400 and/or ORCAA's Regulations.</p>	None	None
4.10	ORCAA 8.8 (local only)	<p>Maintenance and Repair of Air Pollution Control Equipment and Processes. All air contaminant sources are required to keep any process and/or air pollution control equipment in good operating condition and repair.</p>	None	6.7

Table 4.1 - Facility-wide and General Applicable Requirements (continued)

#	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Additional Monitoring Provisions Pursuant to WAC 173-401-615(1)(b) Required Monitoring
4.11	ORCAA 8.2 (local only); WAC 173-400-040(4±2)	<p>General Standards for Maximum Visual Emissions.</p> <p>(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.</p> <p>(b) Observations shall be made by trained and certified observers or by LIDAR instrumentation.</p> <p>(c) The exceptions to the opacity standard stated in (a) above are as follows:</p> <ul style="list-style-type: none"> i. Emissions occurring due to soot blowing or grate cleaning may be greater than 20% opacity; providing the operator can demonstrate that soot blowing or grate cleaning will not exceed a total of 15 minutes in any consecutive 8 hours. This practice, except for testing and troubleshooting, is to be scheduled for the same approximate times each day and ORCAA shall be advised of the schedule. ii. When the owner or operator of a source supplies valid data to show that the presence of uncombined water is the only reason for the opacity to exceed 20%. 	Ecology Method 9A.	6.1 6.2 6.3
4.12	WAC 173-400-040(6Z)	<p>Sulfur Dioxide. WAC 173-400-040(6Z) prohibits emission of a gas containing sulfur dioxide from any emission 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 in accordance with the reference test method.</p>	EPA Method 6, 6A, 6B, or 6C	6.6
4.13	WAC 173-400-050(1); ORCAA 8.3(a) (local only)	<p>General Particulate Standards for Combustion Units. No person shall cause or permit the emissions of particulate matter in excess of 0.23 gram per dry cubic meter at standard conditions (0.1 grain/dscf), except, for an emissions unit combusting wood derived fuels for the production of steam. No person shall allow or permit the emission of particulate matter in excess of 0.46 gram per dry cubic meter at standard conditions (0.20 grain/dscf), as measured by EPA method 5 or approved procedures contained in "Source Test Manual - Procedures For Compliance Testing" state of Washington, Department of Ecology. Measured concentrations shall be adjusted for volumes corrected to 7% oxygen, except when ORCAA determines that an alternate oxygen correction factor is more representative of normal operations.</p>	EPA Method 5 of 40 CFR Part 60, Appendix A.	6.98

Table 4.1 - Facility-wide and General Applicable Requirements (continued)

#	Applicable Requirement Citations	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Additional Monitoring Provisions Pursuant to WAC 173-401-615(1)(b) Required Monitoring
4.14	WAC 173-400-060 ORCAA 8.3(a) (local only)	General Emission Standards for Process Units. No person shall cause or permit the emission of particulate material from any general process operation in excess of 0.23 grams per dry cubic meter at standard conditions (0.1 grain/dscf) of exhaust gas.	EPA Method 5 of 40 CFR Part 60, Appendix A.	6.98

5. Emission Unit Specific Requirements

5.1 Requirements Specific to the Hog Fuel Boiler (EU1)

Table 5.1 - Requirements Specific to the Hog Fuel Boiler (EU1)

#	Applicable Requirement Citation	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Additional Monitoring Provisions Pursuant to WAC 173-401-615(1)(b) Required Monitoring
5.1a	WAC 173-400-040(6)(Z)	Sulfur Dioxide Limit, WAC: SO ₂ emissions shall not exceed 1,000 ppm, dry, corrected to 7% oxygen, hourly average basis.	EPA Method 6, 6A, 6B, or 6C Calculation based on diesel sulfur content	6.6 6.11
5.1b	WAC 173-400-050(1)	Particulate Limit, WAC: Particulate emissions shall not exceed 0.2 grain/dscf, corrected to 7% oxygen, hourly average basis.	EPA Method 5 of 40 CFR Part 60, Appendix A.	6.8 6.11
5.1c	ORCAA 8.3(b) (local only)	Particulate Limit, ORCAA Regulations: Particulate emissions shall not exceed 0.20 grain/dscf, -corrected to 7% oxygen, hourly average basis.	EPA Method 5 of 40 CFR Part 60, Appendix A.	6.8 6.11
5.1d	95NOC646 Condition 3	Particulate Limit, NOC: Except during startup, shutdown, or malfunction in accordance with Rule 8.7 of ORCAA Regulations, particulate emissions from the boiler, including both the back and front half catches, shall not exceed 0.02-0.2 gr/dscf, corrected to 7% oxygen, and 0.1 lbs/MMBtu. Compliance shall be demonstrated based on measured stack grain loading in accordance with procedures in 40CFR part 60, Appendix A, and in accordance with ORCAA's approved particulate source test procedures.	EPA Method 5 of 40 CFR Part 60, Appendix A.	6.8 6.11

Table 5.1 Requirements Specific to the Hog Fuel Boiler (EU1) (continued)

#	Applicable Requirement Citation	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Additional Monitoring Provisions Pursuant to WAC 173-401-615(1)(b) Required Monitoring
5.1e	ORCAA 8.2 (local only)	<p>Opacity Limit, ORCAA Regulations: The permittee shall not cause or allow emissions from EU1, for more than three (3) minutes in any one hour, of a gas stream containing air contaminants which are greater than 20% opacity except:</p> <p>a) When the emissions occur due to soot blowing/grate cleaning and the operator can demonstrate that emissions will not exceed 20% opacity for more than 15 minutes in any consecutive 8 hours. Soot blowing/grate cleaning is to be scheduled for the same approximate times each day and the permittee shall advise ORCAA of the schedule.</p> <p>b) When the permittee supplies valid data to show that the presence of uncombined water is the only reason for the opacity to exceed 20%.</p>	Ecology Method 9A.	6.1 6.2 6.3 6.14
5.1f	WAC 173-400-040(42); WAC 173-400-070(2)(a)	<p>Opacity Limit, WAC: The permittee shall not cause or allow emissions from EU1 for more than three minutes in any one hour, which at the emissions point, or within a reasonable distance from the emissions point, exceeds 20% opacity except:</p> <p>a) When emissions occur due to soot blowing/grate cleaning and the permittee can demonstrate that the emissions will not exceed 20% opacity for more than 15 minutes in any 8 consecutive hours. This practice, except for testing and trouble shooting, is to be scheduled for the same approximate times each day and ORCAA shall be advised of the schedule.</p> <p>b) When the permittee supplies valid data to show that the presence of uncombined water is the only reason for the opacity to exceed 20%.</p>	Ecology Method 9A.	6.1 6.2 6.3 6.14
5.1g	95NOC646 Condition 4	<p>Opacity Limit, NOC: Boiler visual emissions shall not exceed ten (10) percent opacity in accordance with 40 CFR Part 60 Appendix A Method 9 except during startup, shutdown, or malfunction.</p>	EPA Method 9 of 40 CFR Part 60, Appendix A.	6.1 6.2 6.3 6.14

Table 5.1 Requirements Specific to the Hog Fuel Boiler (EUI) (continued)

#	Applicable Requirement Citation	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Additional Monitoring Provisions Pursuant to WAC 173-401-615(1)(b) Required Monitoring
5.1h	<p>§60.43b(c)(1) and §60.43b(g) §60.46b(a) §60.46b(d)(1)-(6) §60.8</p>	<p>Particulate Limit, Subpart Db: In accordance with §60.43b(c)(1), particulate emissions shall not exceed 0.10 pounds per million Btu heat input. The following provisions shall apply:</p> <p>a) The limit shall apply at all times except during periods of startup, shutdown or malfunction in accordance with sections §60.43b(g) and §60.46b(a).</p> <p>b) Compliance with the limit shall be determined by testing in accordance with the methods and procedures specified under §60.46b(d)(1)-(6) and §60.8.</p>	<p>EPA Method 5 of 40 CFR Part 60, Appendix A.</p>	<p>6.8 6.11</p>
5.1i	<p>§60.43b(f); and: §60.11(c); §60.43b(g); §60.46b(a); §60.46b(d)(7); §60.11(e)(3) §60.8</p>	<p>Opacity Limit, Subpart Db: In accordance with §60.43b(f), 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. The following provisions shall apply:</p> <p>a) The limit shall apply at all times except during periods of startup, shutdown or malfunction in accordance with sections §60.11(c), §60.43b(g) and §60.46b(a).</p> <p>b) In accordance with §60.46b(d)(7), compliance shall be determined through performance testing using EPA Reference Method 9.</p> <p>c) In accordance with §60.11(e)(3), the permittee may request the EPA Administrator to determine and record the opacity of emissions during the initial and subsequent performance tests.</p> <p>d) Procedures for conducting performance tests for purposes of determining compliance with this limit shall conform to the procedures contained in §60.8(a)-(f).</p>	<p>EPA Method 9 of 40 CFR Part 60, Appendix A.</p>	<p>6.1 6.2 6.3 6.14</p>
5.1j	§60.12	<p>Subpart Db Concealment Prohibition: In accordance with §60.12, the permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere.</p>	not applicable	not applicable

Table 5.1 Requirements Specific to the Hog Fuel Boiler (EUI) (continued)

#	Applicable Requirement Citation	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Additional Monitoring Provisions Pursuant to WAC 173-401-615(1)(b) Required Monitoring
5.1k	95NOC646 Condition #5	NOx Limit: NOx emissions from the boiler shall not exceed 175 ppmvd corrected to 7% oxygen on an hourly average basis. Compliance shall be demonstrated based on measured stack NOx concentrations from three, 60 minute samples using EPA Reference Methods 1, 2, 3, 4 and 7, or other test methods as approved by ORCAA.	EPA Reference Methods 1, 2, 3, 4 and 7, or other test methods as approved by OAPCA.	6.10 6.11
5.1l	95NOC646 Condition #6	CO Limit: CO emissions from the boiler shall not exceed 300 ppmvd corrected to 7% O2 on an hourly average basis. Compliance shall be demonstrated based on measured stack CO concentrations from three, 60 minute samples using EPA Reference Methods 1, 2, 3, 4 and 10, or other test methods as approved by ORCAA.	EPA Reference Methods 1, 2, 3, 4 and 10, or other test methods as approved by ORCAA	6.9 6.11
5.1m	01NOC110 Condition #12	Fuel Specifications: Only clean hog fuel shall be burned in the boiler (no paint, creosote, treated wood, etc.) The term "clean hog fuel" shall not be construed to preclude hog fuel from log supplies which have been in contact with salt water during transport. On an infrequent basis, the owner or operator shall be allowed to dispose of waste oil booms and absorbent pads used to clean up minor on site oil spills. The owner or operator shall keep record of the volume in gallons of waste in the booms and pads that are disposed of in this manner.	none	none
5.1n	95NOC646 Condition #9	O&M Plan: Requires the permittee devise and implement an Operations and Maintenance Plan for maintaining air pollution controls on the hog fuel boiler.	not applicable	none

Table 5.1 Requirements Specific to the Hog Fuel Boiler (EUI) (continued)

#	Applicable Requirement Citation	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Additional Monitoring Provisions Pursuant to WAC 173-401-615(1)(b) Required Monitoring
5.1o	§60.11(d)	<p>Subpart Db Operation and Maintenance Requirement: At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any facility subject to Subpart Db and associate air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.</p> <p>Provisions added for clarification under authority of WAC 173-401-600(1) and (2): The criteria specified in Condition 6-7-6.13 shall be used as an indication of good operating condition and repair of pollution controls for the hog fuel boiler (EUI). For purposes of assuring compliance with this condition, the permittee shall promptly take corrective action to maintain EU1 air pollution control equipment in good operating condition and repair. Corrective action shall be taken as soon as possible, but in no case later than 24 hours from the time monitoring indicates failure to maintain EU1 pollution controls in good operating condition and repair. Failure to promptly take corrective action is a violation of Condition 5.1o.</p>	not applicable	6-7 6.13
5.1p	ORCAA 8.8 (local only)	<p>Regulation 1 Operation and Maintenance Requirement: All air contaminant sources are required to keep any process and/or air pollution control equipment in good operating condition and repair.</p> <p>Provisions added for clarification under authority of WAC 173-401-600(1) and (2): The criteria specified in Condition 6-7-6.13 shall be used as an indication of good operating condition and repair of -pollution controls for the hog fuel boiler (EUI). For purposes of assuring compliance with this condition, the permittee shall promptly take corrective action to maintain EU1 air pollution control equipment -in good operating condition and repair. Corrective action shall be taken as soon as possible, but in no case later than 24 hours from the time monitoring indicates failure to maintain EU1 pollution controls in good operating condition and repair. Failure to promptly take corrective action is a violation of Condition 5.1p.</p>	not applicable	6-7-13
5.1q	40 CFR Part 64 §64.7(b)	<p>Proper Maintenance of Monitoring Systems. The permittee shall maintain EU1 emissions monitoring systems, including but not limited to, maintaining necessary parts for routine repairs of monitoring equipment.</p>	None	6.13

Table 5.1 Requirements Specific to the Hog Fuel Boiler (EU1) (continued)

#	Applicable Requirement Citation	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Additional Monitoring Provisions Pursuant to WAC 173-401-615(1)(b) Required Monitoring
5.1.r	40 CFR Part 64 §64.7(d)	<p>Response to Excursions or Exceedances. Upon detecting an excursion as defined in condition 6.13, the permittee shall restore operation of EU1, including control devices and systems, to normal operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of the excursion. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or excess emissions from EU1 will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system and the process.</p>	None	6.13

5.2 Requirements Specific to the Dry Kilns (EU2)

Table 5.2 - Requirements Specific to the Dry Kilns (EU2)

#	Applicable Requirement Citation	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Additional Monitoring Provisions Pursuant to WAC 173-401-615(1)(b)
5.2a	local only: ORCAA 8.3(a)	General Standards for Maximum Particulate Matter Standards for Process and Combustion Units: 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 for combustion sources). 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.	EPA Method 5 of 40 CFR Part 60, Appendix A, or other method which is approved by ORCAA.	none
5.2b	WAC 173-400-060	General Emission Standards for Process Units: No person shall cause or permit the emission of particulate material from any general process operation in excess of 0.23 grams per dry cubic meter at standard conditions (0.1 grain/dscf) of exhaust gas.	EPA Method 5 of 40 CFR Part 60, Appendix A, or other method which is approved by OAPCA.	none
5.2c	ORCAA 8.2 (local only)	Opacity Limit, ORCAA Regulations: The permittee shall not cause or allow emissions from EU2, for more than three (3) minutes in any one hour, of a gas stream containing air contaminants which are greater than 20% opacity except when the permittee supplies valid data to show that the presence of uncombined water is the only reason for the opacity to exceed 20%.	Ecology Method 9A.	6.1 6.2 6.3
5.2d	WAC 173-400-040(±2)	Opacity Limit, WAC: The permittee shall not cause or allow emissions from EU2 for more than three minutes in any one hour, which at the emissions point, or within a reasonable distance from the emissions point, exceeds 20% opacity except when the permittee supplies valid data to show that the presence of uncombined water is the only reason for the opacity to exceed 20%.	Ecology Method 9A.	6.1 6.2 6.3
5.2e	ORCAA 8.8 (local only)	Regulation 1 Operation and Maintenance Requirement: All air contaminant sources are required to keep any process and/or air pollution control equipment in good operating condition and repair.	none	none
5.2f	40 CFR Part 63 Subpart DDDD	National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products: The permittee shall comply with the applicable requirements of 40 CFR Part 63	none	As specified in 40 CFR Part 63 Subpart DDDD

Table 5.2 Requirements Specific to the Dry Kilns (EU2) (continued)

#	Applicable Requirement Citation	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Additional Monitoring Provisions Pursuant to WAC 173-401-615(1)(b)
5.2f	40 CFR Part 63 Subpart DDDDD	<p>Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products.</p> <p>National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters</p> <p>The permittee shall comply with the applicable requirements of 40 CFR Part 63 Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.</p>		

5.3 Requirements Specific to the Planer Mill (EU3)

Table 5.3 Requirements Specific to the Planer Mill (EU3)

#	Applicable Requirement Citation	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Additional Monitoring Provisions Pursuant to WAC 173-401-615(1)(b)
5.3a	local only: ORCAA 8.3(a)	General Standards for Maximum Particulate Matter Standards for Process and Combustion Units: 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 for combustion sources). 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.	EPA Method 5 of 40 CFR Part 60, Appendix A-, or other method which is approved by ORCAA.	none
5.3b	WAC 173-400-060	General Emission Standards for Process Units: No person shall cause or permit the emission of particulate material from any general process operation in excess of 0.23 grams per dry cubic meter at standard conditions (0.1 grain/dscf) of exhaust gas.	EPA Method 5 of 40 CFR Part 60, Appendix A, or other method which is approved by ORCAA.	none
5.3c	94NOC553 Condition 4c	Particulate Limit, Clark Baghouse: Emissions from baghouse #1 (Clark baghouse) shall not exceed 0.01 grains/scf, hourly average basis, as determined by Method 5 in Appendix A of 40 CFR Part 60.	EPA Method 5 of 40 CFR Part 60, Appendix A.	6.7 6-10, 6.11
5.3d	ORCAA 8.2 (local only)	Opacity Limit, ORCAA Regulations: The permittee shall not cause or allow emissions from EU3, for more than three (3) minutes in any one hour, of a gas stream containing air contaminants which are greater than 20% opacity except when the permittee supplies valid data to show that the presence of uncombined water is the only reason for the opacity to exceed 20%.	Ecology Method 9A.	6.1 6.2 6.3
5.3e	WAC 173-400-040(±2)	Opacity Limit, WAC: The permittee shall not cause or allow emissions from EU3 for more than three minutes in any one hour, which at the emissions point, or within a reasonable distance from the emissions point, exceeds 20% opacity except when the permittee supplies valid data to show that the presence of uncombined water is the only reason for the opacity to exceed 20%.	Ecology Method 9A.	6.1 6.2 6.3
5.3f	94NOC553 Condition 4c	Opacity Limit, Clark Baghouse (#1): Emissions from the planer mill baghouse #1 (Clark-baghouse) shall not exceed 10% opacity in accordance with 40 CFR Part 60 Appendix A Method 9.	EPA Method 9 of 40 CFR Part 60, Appendix A.	6.1 6.2 6.3

Table 5.3 Requirements Specific to the Planer Mill (EU3) (continued)

#	Applicable Requirement Citation	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Additional Monitoring Provisions Pursuant to WAC 173-401-615(1)(b)
5.3g	96NOC031 Condition 3	Opacity Limit, Carter Day Baghouse (#2): Visual emissions from the planer mill baghouse #2 (Carter Day baghouse) shall not exceed 10% opacity in accordance with 40CFR Part 60 Appendix A.	EPA Method 9 of 40 CFR Part 60, Appendix A.	6.1 6.2 6.3
5.3h	98NOC009 Condition 2	Opacity Limit, Package Saw Baghouse: Visual emissions from the package saw baghouse shall not exceed ten (10) percent opacity in accordance with 40CFR Part 60 Appendix A method 9.	EPA Method 9 of 40 CFR Part 60, Appendix A.	6.1 6.2 6.3
5.3i	94NOC553, Condition 8; 96NOC031, Condition 5	Operations and Maintenance Plan Requirement: The permittee shall implement an operations and maintenance (O&M) plan for maintaining air pollution control equipment and minimizing dust emissions from the planing mill.	not applicable	none
5.3j	ORCAA 8.8 (local only)	Regulation 1 Operation and Maintenance Requirement: All air contaminant sources are required to keep any process and/or air pollution control equipment in good operating condition and repair. Provisions added for clarification under authority of WAC 173-401-600(1) and (2): The criteria specified in Condition 6.7 shall be used as an indication of good operating condition and repair of pollution controls for the planer mill (EU3). For purposes of assuring compliance with this condition, the permittee shall promptly take corrective action to maintain EU3 air pollution control equipment in good operating condition and repair. Corrective action shall be taken as soon as possible, but in no case later than 24 hours from the time monitoring indicates failure to maintain EU3 pollution controls in good operating condition and repair. Failure to promptly take corrective action is a violation of Condition 5.3k.	none	6.7

5.4 Requirements Specific to the Sawmill (EU4)

Table 5.4 – Requirements Specific to the Sawmill (EU4)

#	Applicable Requirement Citation	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Additional Monitoring Provisions Pursuant to WAC 173-401-615(I)(b)
5.4a	local only: ORCAA 8.23(a)	General Standards for Maximum Particulate Matter Standards for Process and Combustion Units: 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 for combustion sources). 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.	EPA Method 5 of 40 CFR Part 60, Appendix A, or other method which is approved by ORCAA.	none
5.4b	WAC 173-400-060	General Emission Standards for Process Units: No person shall cause or permit the emission of particulate material from any general process operation in excess of 0.23 grams per dry cubic meter at standard conditions (0.1 grain/dscf) of exhaust gas.	EPA Method 5 of 40 CFR Part 60, Appendix A, or other method which is approved by ORCAA.	none
5.4c	ORCAA 8.2 (local only)	Opacity Limit, ORCAA Regulations: The permittee shall not cause or allow emissions from EU4, for more than three (3) minutes in any one hour, of a gas stream containing air contaminants which are greater than 20% opacity except when the permittee supplies valid data to show that the presence of uncombined water is the only reason for the opacity to exceed 20%.	Ecology Method 9A.	6.1 6.2 6.3
5.4d	WAC 173-400-040(42)	Opacity Limit, WAC: The permittee shall not cause or allow emissions from EU4 for more than three minutes in any one hour, which at the emissions point, or within a reasonable distance from the emissions point, exceeds 20% opacity except when the permittee supplies valid data to show that the presence of uncombined water is the only reason for the opacity to exceed 20%.	Ecology Method 9A.	6.1 6.2 6.3
5.4e	98NOC004, Condition 2	Opacity Limit, sawmill Baghouse: Visual emissions from the sawmill baghouse shall not exceed 10% opacity in accordance with 40CFR Part 60 Appendix A Method 9.	EPA Method 9 of 40 CFR Part 60, Appendix A.	6.1 6.2 6.3

Table 5.4 Requirements Specific to the Sawmill (EU4) (continued)

#	Applicable Requirement Citation	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Additional Monitoring Provisions Pursuant to WAC 173-401-615(1)(b)
5.4f	ORCAA 8.8 (local only)	<p>Regulation 1 Operation and Maintenance Requirement: All air contaminant sources are required to keep any process and/or air pollution control equipment in good operating condition and repair.</p> <p>Provisions added for clarification under authority of WAC 173-401-600(1) and (2): The criteria specified in Condition 6.7 shall be used as an indication of good operating condition and repair of pollution controls for the sawmill (EU4). For purposes of assuring compliance with this condition, the permittee shall promptly take corrective action to maintain EU4 air pollution control equipment in good operating condition and repair. Corrective action shall be taken as soon as possible, but in no case later than 24 hours from the time monitoring indicates failure to maintain EU4 pollution controls in good operating condition and repair. Failure to promptly take corrective action is a violation of Condition 5.4g.</p>	none	6.7

5.5 Requirements Specific to the Hog Fuel Delivery System (EU5)

Table 5.5 Requirements Specific to the Hog Fuel Delivery System (EU5)

#	Applicable Requirement Citation	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Additional Monitoring Provisions Pursuant to WAC 173-401-615(1)(b)
5.5a	local only: ORCAA 8.3(a)	General Standards for Maximum Particulate Matter Standards for Process and Combustion Units: 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 for combustion sources). 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.	EPA Method 5 of 40 CFR Part 60, Appendix A-, or other method which is approved by ORCAA.	none
5.5b	WAC 173-400-060	General Emission Standards for Process Units: No person shall cause or permit the emission of particulate material from any general process operation in excess of 0.23 grams per dry cubic meter at standard conditions (0.1 grain/dscf) of exhaust gas.	EPA Method 5 of 40 CFR Part 60, Appendix A-, or other method which is approved by ORCAA.	none
5.5c	95NOC554, Condition 4c	Particulate Limit, Powerhouse Baghouse: Emissions from the powerhouse baghouse shall not exceed 0.01 grains/scf, hourly average basis, as determined by Method 5 of 40 CFR Part 60, Appendix A.	EPA Method 5 of 40 CFR Part 60, Appendix A.	none
5.5d	ORCAA 8.2 (local only)	Opacity Limit, ORCAA Regulation 1: The permittee shall not cause or allow emissions from EU5, for more than three (3) minutes in any one hour, of a gas stream containing air contaminants which are greater than 20% opacity except when the permittee supplies valid data to show that the presence of uncombined water is the only reason for the opacity to exceed 20%.	Ecology Method 9A.	6.1 6.2 6.3
5.5e	WAC 173-400-040(42)	Opacity Limit, WAC: The permittee shall not cause or allow emissions from EU5 for more than three minutes in any one hour, which at the emissions point, or within a reasonable distance from the emissions point, exceeds 20% opacity except when the permittee supplies valid data to show that the presence of uncombined water is the only reason for the opacity to exceed 20%.	Ecology Method 9A.	6.1 6.2 6.3

Table 5.4 Requirements Specific to the Sawmill (EU4) (continued)

#	Applicable Requirement Citation	Applicable Requirement Description (for information purposes only)	Reference Method (if applicable)	Additional Monitoring Provisions Pursuant to WAC 173-401-615(1)(b)
5.5f	06NOC467, Condition 2	Opacity Limit, Powerhouse Baghouse: Emissions from the powerhouse baghouse shall not exceed 10% opacity in accordance with EPA 40CFR Part 60 Appendix A Method 9.	EPA Method 9 of 40 CFR Part 60, Appendix A.	6.1 6.2 6.3
5.5g	ORCAA 8.8 (local only)	Regulation 1 Operation and Maintenance Requirement: All air contaminant sources are required to keep any process and/or air pollution control equipment in good operating condition and repair. Provisions added for clarification under authority of WAC 173-401-600(1) and (2): The criteria specified in Condition 6.7 shall be used as an indication of good operating condition and repair of pollution controls for the hog fuel delivery system (EU5). For purposes of assuring compliance with this condition, the permittee shall promptly take corrective action to maintain EU5 air pollution control equipment in good operating condition and repair. Corrective action shall be taken as soon as possible, but in no case later than 24 hours from the time monitoring indicates failure to maintain EU5 pollution controls in good operating condition and repair. Failure to promptly take corrective action is a violation of Condition 5.5h.	none	6.7
5.5h	06NOC467, Condition 3	Operations and Maintenance Plan Requirement: The permittee shall implement an operations and maintenance (O&M) plan for maintaining air pollution control equipment and minimizing dust emissions from the planning mill.	none	none

6. COMPLIANCE MONITORING CONDITIONS

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

- a) The frequency for conducting the survey shall be monthly.
- b) Surveys shall be conducted from locations with a clear view of the facility and where the sun is not directly in the observer's eyes. Survey locations shall be at least 15 feet but not more than 0.25 miles from the facility.
- c) Surveys shall be conducted while the facility is operating.
- d) Observer certification for plume evaluation is not required to conduct the survey. However, it is necessary that the observer is educated on the general procedures for determining the presence of visible emissions. As a minimum, the observer must be trained and knowledgeable regarding the effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, observer position relative to source and sun, and the presence of uncombined water.
- e) The survey shall consist of a visual scan of the facility and direct observation of all stacks to identify any visible emissions excluding water vapors.
- f) Each stack shall be observed for a minimum cumulative duration of 15 seconds during the survey.
- g) Any visible emissions other than uncombined water shall be recorded as a positive reading associated with the emission point or stack.
- h) If it is not possible to conduct the survey due to inclement weather conditions, the permittee shall make three attempts during the day to conduct the survey. All attempts to conduct the survey shall be recorded in accordance with section 7 recordkeeping requirements.
- i) In addition to the standard records required under section 7 of this permit, the observer shall record the wind direction, sky condition, sun location with respect to the facility and the survey location, and the time duration of the survey.

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

6.2 Certified Opacity Reading Required. In accordance with Condition 6.3, the permittee shall verify compliance of any emission unit with respect to applicable opacity limits under the following circumstances:

- a) When visible emissions other than uncombined water are observed during opacity surveys and corrections can-not be made within 24 hours;
- b) When an emissions unit fails to meet ~~any of the operating specifications prescribed under condition 6.13~~ the target operating ranges in Table 6.2 and corrections can-not be made within 24 hours;
- c) When required by ORCAA.

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

6.3 Certified Opacity Reading Procedures. When required, pursuant to condition 6.2, the permittee shall conduct certified opacity readings consistent with the appropriate reference test methods as follows:

- a) Certified opacity readings shall be initiated as soon as possible, but not later than 1 hour after the requirement to verify compliance is triggered (that is, 24 hours plus 1 hour after an operating parameter or opacity event described in Condition 6.2) unless the subject emission

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

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

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

6.4 Monitoring Air Impacts Which are Detrimental or a Nuisance to Persons or Property.

The permittee shall monitor all air quality related complaints directed to the facility as follows:

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

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

6.5 Fugitive Emissions and Dust Control Monitoring. The permittee shall monitor equipment and operations to assure reasonable and appropriate precautions are taken for preventing fugitive emissions and dust. Reasonable and appropriate precautions adopted by Weyerhaeuser Raymond for preventing fugitive emissions and fugitive dust shall be described in a written list that shall be made available for inspection by ORCAA upon request.

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

6.6 Sulfur Dioxide Emissions Monitoring. The permittee shall determine the sulfur content of fuels used, as received, using ASTM D4294-98, or EPA Method 6010, except that no determination is needed for diesel fuel containing less than 2% sulfur by weight, propane or natural gas. The permittee may rely upon information from fuel suppliers as to sulfur content, and upon general published information regarding sulfur content of solid fuels or test results. For liquid fuels combusted by emission units at the facility, the permittee shall confirm prior to purchase -that the sulfur content of the liquid fuel used is less than 2%. The use of any fuel with a sulfur content of greater than 2% requires a reference method source test during the use of that fuel.
[WAC 173-401-615(1)(b)]

6.7 Pollution Control Equipment Monitoring. The owner or operator shall monitor air pollution control equipment and systems for the specified emission units according to Table 6.1 and any corrective actions taken to maintain operations within target operating ranges. 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 EU is not operating provided the permittee keeps a contemporaneous record of when the EU is not operating.

TABLE 6.1 - Prescribed Operating Ranges for Pollution Control Equipment

Emission Unit (EU)	Parameter & Prescribed Operating Range	Monitoring Averaging Period	Sampling or Measuring Frequency of Instrument	Monitoring and Recording Frequency	Reporting Frequency
EU3 Planer Mill	Clark baghouse Magnahelic pressure drop 1.0 – 3.5 inches water Carter Day baghouse Magnahelic pressure drop 0.5 – 5.0 inches water.	none	continuous	daily recording of instantaneous pressure drop	6 months
EU4 Sawmill	Superior Systems baghouse Magnahelic pressure drop 0.5 – 4.5 inches water.	none	continuous	daily recording of instantaneous pressure drop	6 months
EU5 Hog Fuel System	Clark baghouse Magnahelic pressure drop 0.75 – 3.5 inches water.	none	continuous	weekly recording of instantaneous pressure drop	6 months

[WAC 173-401-615(1)(b); WAC 173-401-615(3)(a); 95NOC553 Condition 9; 95NOC554 Condition 6; 06NOC467 Condition 4]

6.8 Particulate Testing Required. The permittee shall determine EU1 stack grain loading in accordance with the applicable Reference Test Method and Condition 6.11 procedures at least once during the permit term and whenever required by ORCAA. Particulate grain loading shall be in terms of grains per dry standard cubic foot at standard conditions and 7% oxygen.
[WAC 173-401-615(1)(b)]

6.9 EU1, CO Monitoring: The owner or operator shall determine the concentration of EU1 CO emissions through stack testing using EPA Reference Methods 1, 2, 3, 4, and 10 in accordance with condition 7.10 at least once during the permit terms and as required by ORCAA.
[WAC 173-401-615(1)(b); 95 NOC Condition 6]

6.10 EU1, NO_x Monitoring: The permittee shall determine the concentration of EU1 NO_x emissions through stack testing in accordance with EPA Reference Methods 1, 2, 3, 4, and 7 at least once during the permit term and as required by ORCAA.
[WAC 173-401-615(1)(b); 95 NOC646 Condition 5]

6.11 Source Testing Procedures: When required, source testing shall be conducted as follows:

- a) EPA Reference Test Methods from 40 CFR Part 60, Appendix A, or equivalent methods as approved by ORCAA shall be used;
- b) A source test plan describing proposed procedures for monitoring operational parameters and test methods during the test shall be submitted to ORCAA for approval at least 30 days prior to the scheduled test date; and,
- c) Source test results shall be submitted to ORCAA no later than 90 days after completing the source test.

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

6.12 Soot Blowing/Grate Cleaning: The permittee shall advise ORCAA of the schedule for soot blowing and shall maintain records whenever soot blowing occurs more than one hour before or after the scheduled time.
[WAC 173-400-040(1)(a); ORCAA 8.2(c)(1)]

6.13 Wellons Hog Fuel Boiler Compliance Assurance Monitoring. The permittee shall implement a Compliance Assurance Monitoring Plan for (EU1) consistent with 40 CFR Part 64, Compliance Assurance Monitoring, as follows:

- a) **Monitoring Indicators.** The permittee shall monitor operating indicators as specified in Table 6.2 below whenever subject emissions units are operating [§64.7(a)].
- b) **Exemptions.** The permittee is temporarily exempted from a monitoring requirement of this condition when the associated monitoring system is inoperable either due to an unavoidable breakdown or malfunction, or due to a routine scheduled repair or calibration check as specified in Table 6.2. In determining whether a monitoring system malfunction or breakdown was unavoidable, the following criteria shall be considered:
 - i) Whether the malfunction was caused by poor or inadequate operation, maintenance, or any other reasonably preventable condition;
 - ii) Whether the malfunction was of a recurring pattern indicative of inadequate operation or maintenance; and

- iii) Whether the permittee took appropriate action as expeditiously as practicable to correct the malfunction. [§64.7(c)]
- c) **Minimum Data Recovery.** For any indicator requiring hourly or more frequent monitoring under this condition, the permittee shall recover valid monitoring data in accordance with the averaging periods specified in Table 6.2 for at least 90% of the time the subject emission unit is required to be monitored. Data recorded during monitoring system malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of assessing the operation of the control device being monitored [§64.6(c)(4); §64.7(c)].
- d) **Definition of Excursion.** Except during startup or shutdown of the subject emission unit, any occurrence when operation of the emission unit fails to meet any of the target operating ranges specified in Table 6.2 below will constitute an excursion if the out-of-range indicator can not be brought back into conformance with its target operating range or condition within 24-hours from the time the out-of-range operation was first noted or recorded [§64.6(c)(2)].
- e) **Quality Improvement Plan (QIP) Required.** Based on results of a notification by the permittee of the need for improved monitoring of the Wellons Hog Fuel Boiler (EU1), as required under condition 8.7, the permitting authority or the Administrator may require the permittee to develop and implement a Quality Improvement Plan (QIP) in accordance with §64.8 of 40 CFR Part 64 [40 CFR Part 64, §64.8].

Table 6.2 – CAM Indicators

Emission Unit Indicator [§64.3(a); §64.6(c)(1)(i)]	Target Operating Ranges and Conditions [§64.3(a); §64.6(c)(1)(i)]	Monitoring Means [§64.3(a); §64.6(c)(1)(ii)]	Monitoring Frequency [§64.3(a); §64.6(c)(1)(i)]	Performance Requirements [§64.3(b); §64.6(c)(1)(iii)]
EU1 Opacity (six-minute average)	10% opacity (six-minute average)	Continuous Opacity Monitor meeting the requirements of Condition 6.14	1. Sampling frequency in accordance with Condition 6.14 2. Audible alarm if target exceeded 3. Visual checks of recorded 6-minute opacity data by operator every shift	COMS maintained according to Condition 6.14
EU1 ESP Voltage	The target operating ranges will be selected based upon the values maintained during normal operation and levels recorded during the performance testing. <u>Cell-TR1: 30-55 kV</u> <u>Cell-TR2: 35-55 kV</u>	ESP voltage monitors	Voltage values collected once per shift resulting in 3 values recorded per day	Confirm the voltmeter zero when the ESP is not operating at least semi-annually. Perform all manufacturer's recommended maintenance.

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

6.14 EU1 Continuous Opacity Monitoring. The permittee shall install, calibrate, maintain and operate a continuous monitoring system for measuring the opacity of emissions discharged to the atmosphere from EU1 and record the output of the system. Equipment, methods and procedures for monitoring opacity shall conform to the requirements regarding continuous opacity monitoring in §60.13, §60.48b(a), and §60.48b(e) as follows:

- a) **Automated Daily Check of Zero and Span Calibration Drifts.** The COMS must automatically, intrinsic to the opacity monitor, check the zero and upscale (span) calibration drifts at least once daily. For a particular COMS, the acceptable range of zero and upscale calibration materials is as defined in the applicable version of Performance Specification 1 in appendix B of this 40 CFR Part 60. For a COMS, the optical surfaces, exposed to the effluent gases, must be cleaned before performing the zero and upscale drift adjustments, except for systems using automatic zero adjustments. The optical surfaces must be cleaned when the cumulative automatic zero compensation exceeds 4 percent opacity.
[§60.13(d)(1)]
- b) **Minimum Procedures for Producing a Simulated Zero and Upscale Opacity Condition for Daily Calibration Drift Checks.** At a minimum, procedures must include an automated method for producing a simulated zero opacity condition and an upscale opacity condition using a certified neutral density filter or other related technique to produce a known obstruction of the light beam. Such procedures must provide a system check of all active analyzer internal optics with power or curvature, all active electronic circuitry including the light source and photo detector assembly, and electronic or electro-mechanical systems and hardware and or software used during normal measurement operation.
[§60.13(d)(2)]
- c) **Minimum Frequency of Operation.** Except for system breakdowns, repairs, calibration checks, and zero and span adjustments required by this condition, 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. [§60.13(e)(1)]
- d) **Location of the COMS.** The COMS shall be installed such that representative measurements of emissions or process parameters from EU1 are obtained. Procedures for location of continuous monitoring systems contained in the Performance Specifications of appendix B of 40 CFR Part 60 shall be used to locate the COMS when applicable.
[§60.13(f)]

[§60.48b(a); §60.48b(e); §60.13; 95NOC 647 Condition 8]

7. RECORDKEEPING

7.1 Retention and Availability of Records: The permittee shall maintain all records required by this permit. All required records shall be retained for at least 5 years from the origination date and shall be available for inspection by ORCAA upon request.

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

7.2 Record of Changes. The permittee shall maintain records describing changes made that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

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

7.3 Monitoring Records. The permittee shall keep records of required monitoring and testing including, where applicable, the following:

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

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

7.4 Record of Permit Deviations. The permittee shall maintain a contemporaneous record of all permit deviations.

[WAC 173-401-615(3)(b)]

7.5 Display of Orders, Certificates and Other Notices: Any order required by Regulation 1 shall be available on the premises designated on the order. In the event that ORCAA requires a notice to be displayed, it shall be posted.

[Local Only: ORCAA 7.4]

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

[Local only: ORCAA 8.11]

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

[WAC 173-400-105(1); ORCAA 8.11]

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

[Local Only: ORCAA 7.3]

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

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

[WAC 173-401-615(1)(b) & (2)]

7.10 Record of Actions Taken. In addition to the standard record keeping requirements for monitoring records 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 time the subject equipment was not operational.

[WAC 173-401-615(1)(b) & (2)]

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

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

7.12 MACT Applicability Records: For each relevant standard in 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) that demonstrates 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 with regard to the relevant standard or other requirement. If required, the analysis shall be performed in accordance with requirements established in the relevant subpart for this purpose, and the analysis should be performed in accordance with EPA guidance materials published to assist sources in making applicability determinations under section 112, if any.

[40 CFR 63.1(b)(3); 40 CFR 63.10(b)(3)]

7.13 Copies of Required Operations and Maintenance Plans. Written copies of all Operations and Maintenance Plans required under this permit shall be maintained and made available for inspection.

[WAC 173-401-615(1)(b) & (2); 95NOC662 Condition 4; 95NOC662 Condition 6]

8. REPORTING

8.1 Certification of Reports. All reports, including any test results, monitoring results, applications, emissions inventories, equipment malfunction reports or compliance reports, submitted to ORCAA or the U.S. Environmental Protection Agency Region 10 (EPA) under requirements of this permit, shall be certified as being true, accurate, and complete by a responsible official. Such certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete. Provided, however, where a report is sent more frequently than once every 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.

[WAC 173-401-630(1)]

8.2 Annual Compliance Certification. The permittee shall annually submit to ORCAA and to the U.S. Environmental Protection Agency Administrator, in care of Region 10 of the U.S. Environmental Protection Agency (EPA), an Annual Compliance Certification report which shall certify 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 no later than January 31st each year and shall cover the continuous 12-month period ending the previous December 31st. The reports shall be certified by a responsible official in accordance with Condition 8.1. 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.

[WAC 173-401-630(5)]

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

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

[Local Only: ORCAA 1.6]

8.4 Semi-annual Monitoring Reports. Unless a shorter time period is specified in this permit, a report of any required monitoring shall be submitted to ORCAA at least once every six months (Semi-annual Monitoring Report). Semi-annual Monitoring Reports shall include a summary of all monitoring conducted in accordance with Section 6 of this permit, and shall include the following as applicable:

- a) A statistical summary of results of required monitoring conducted over the reporting period;

- b) Identification and characterization of all instances of deviations from permit requirements;
- c) Statistical summary of the operation of emissions units subject to CAM (condition 6.813) including the total number of hours operating and down time;
- d) Statistical summary of the number, duration and cause (including unknown cause, if applicable) of excursions as defined in condition 6.8;6.13
- e) Summary description of any corrective actions taken to maintain air pollution controls identified in tables 6.1 or 6.2;
- f) Summary information on the number, duration and cause (including unknown cause, if applicable) of downtime of any monitors required by this permit (other than downtime associated with zero and span or other daily calibration checks, if applicable); and,
- g) If required, a description of the actions taken to implement a Quality Improvement Plan (QIP) during the reporting period pursuant to condition 6.813(e).

Monitoring reports shall be submitted to ORCAA no later than 30 days after the end of the reporting period and shall be certified by a responsible official in accordance with Condition 8.1. [WAC 173-401-615(3)(a)]

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

- a) **Prompt Reporting.** For purposes of this permit, submitting a report “promptly” means the following:
 - i) **Potential Threat to Human Health or Safety:** If the deviation presents a potential threat to human health or safety, “promptly” means as soon as possible but no later than 12 hours after discovery of the deviation;
 - ii) **Other Deviations:** For other deviations, “promptly” means as soon as possible but no later than 30 days after the end of the month during which the deviation was discovered.
- b) **Deviation Report Content.** Permit deviation reports shall describe the probable cause of such deviations, corrective actions taken or planned, and preventive measures taken.
- c) **Reporting Unavoidable Excess Emissions.** The deviation report may include a demonstration that a-excess emissions were unavoidable due to start-up, shutdown or upset conditions consistent with the requirements of Condition 2.23.
- 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 2.22.

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

8.6 Notification of Control Equipment Malfunction. ORCAA shall be notified by FAX, phone message, e-mail or in writing of malfunctions of pollution control equipment identified in Tables 6.1 or 6.2 when repairs cannot be completed within 24 hours. For purposes of this notification, the term “malfunction” shall mean that the control equipment is inoperable, or can not maintain operation within the prescribed operating conditions specified in Tables 6.1 or 6.2. The notification shall be made within two working days from the time the malfunction was discovered and shall include a description of the malfunction and any corrective actions taken or planned.

[WAC 173-401-615(2)]

8.7 Notification of Need for Improved Monitoring of Emissions Units Subject to CAM. With respect to emissions units subject to CAM, if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify ORCAA and, if necessary, submit a proposed permit modification application to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. [§64.7(e)]

8.8 Notification of Complaint Received. The permittee shall notify ORCAA by FAX , phone message, e-mail or in writing of any complaint received within 24 hours of the time when the complaint or allegation was received. The notification shall include a short description of the complaint, time it was received, actions taken, actions planned and preliminary assessment. [WAC 173-401-615(2)]

8.9 Annual Inventory Report. On an annual basis, the permittee shall submit an inventory of actual emissions emitted during the previous calendar year. The inventory shall be submitted to ORCAA within 30 days of receipt of the standard inventory reporting forms. The inventory shall be accompanied by all associated calculations and data used in calculating the emissions. [WAC 173-400-105(1), ORCAA 4.3]

8.10 Source Test Plans. The permittee shall notify ORCAA in writing at least two weeks (14 days) prior to any compliance test and provide ORCAA an opportunity to review a test plan and to observe the test. The test plan shall describe the proposed source test methods, operational conditions proposed for the test, and provisions for monitoring source operation during the test. [WAC 173-401-630(1)]

8.11 Source Test Reports. Whenever source testing is required, the permittee shall submit test results to ORCAA within 60 days of test completion or with the next semiannual monitoring report. The report shall include:

- a) A description of the source and sampling location;
- b) The time and date of the test;
- c) A summary of results, reported in units and for averaging periods consistent with the applicable emission standard;
- d) A description of the test methods and quality assurance procedures used;
- e) The amount of fuel burned and/or raw material processed by the source during the test;
- f) The operating parameters of the source and control equipment during the test; and,
- g) Field data and example calculations.

[WAC 173-401-630(1)]

9. PERMIT SHIELD CONDITIONS

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

[WAC 173-401-640(1)]

9.2 Inapplicable or Exempt Requirements. The requirements shown in Table 9.1, 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 9.1, 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.

[WAC 173-401-640]

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

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

[WAC 173-401-640]

TABLE 9.1 Requirements Determined Inapplicable or Exempt Unless Triggered by Action or Emission Increase

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

Requirement(s)	Emissions Unit(s)	Exempt or Inapplicable	Brief Description of Requirement	Basis
§60.40b(b)(1)-(4)	EUI	Inapplicable	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units: specific requirements for coal and oil fired affected facilities which commenced construction after June 19, 1984 and completed construction prior to June 19, 1986.	EUI is an affected facility under 40 CFR Part 60, Subpart Db (Subpart Db) and is subject to specific requirements of the subpart. However, these particular specific requirements of the Subpart do not apply since EUI burns only hog fuel.
§60.40b(c)-(f)	EUI	Inapplicable	Subpart Db standards specific to refineries, incinerators, and electric utility steam generating units.	EUI is an affected facility under Subpart Db and subject to specific requirements of the subpart. However, EUI is a wood fired boiler and does not meet the definitions of the types of affected facilities by these specific subsections.
§60.42b (all)	EUI	Inapplicable	Subpart Db standards for sulfur dioxide.	EUI is an affected facility under Subpart Db and subject to specific requirements of the subpart. However, §60.42b requirements are specific to affected facilities which burn coal and oil or, coal or oil in combination with other fuels.
§60.43b(a)	EUI	Inapplicable	Subpart Db standards for particulate matter specific to affected facilities burning coal or coal in combination with other fuels.	EUI is an affected facility under Subpart Db and subject to specific requirements of the subpart. However, §60.43b(a) requirements are specific to affected facilities which burn coal or coal in combination with other fuels. EUI does not burn coal.
§60.43b(b)	EUI	Inapplicable	Subpart Db standards for particulate matter specific to affected facilities burning oil or oil in combination with other fuels.	EUI is an affected facility under Subpart Db and subject to specific requirements of the subpart. However, §60.43b(a) requirements are specific to affected facilities which burn oil or oil in combination with other fuels. EUI does not burn oil.
§60.43b(c)(2)	EUI	Inapplicable	Subpart Db standards for particulate matter specific to affected facilities burning wood at less than 30 percent annual capacity factor.	EUI burns wood at greater than 30% annual capacity factor and is, therefore, subject to the more stringent particulate requirement in §60.43b(c)(1).

TABLE 9.1 Requirements Determined Inapplicable or Exempt Unless Triggered by Action or Emission Increase (continued)

Requirement(s)	Emissions Unit(s)	Exempt or Inapplicable	Brief Description of Requirement	Basis
§60.43b(d)	EUI	Inapplicable	Subpart Db standards for particulate matter specific to affected facilities burning municipal-type solid waste.	EUI does not burn municipal-type solid waste.
§60.44b(a)	EUI	Inapplicable	Subpart Db standards for nitrogen oxides specific to affected facilities burning coal, oil or natural gas.	EUI does not burn these fuel types.
§60.44b(b)	EUI	Inapplicable	Subpart Db standards for nitrogen oxides specific to affected facilities burning mixtures of coal, oil and natural gas.	EUI does not burn these fuel types in any mixture.
§60.44b(c)-(k)	EUI	Inapplicable	Subpart Db standards for nitrogen oxides specific to affected facilities burning coal, oil or natural gas in combination with- other specific fuel types including wood.	EUI does not combust coal, oil or natural gas, therefore, these sections do not apply.
§60.45b (all)	EUI	Inapplicable	Subpart Db compliance and performance test methods and procedures for sulfur dioxide.	EUI is not subject to any of the standards for sulfur dioxide, therefore, these requirements do not apply.
§60.46b(c)	EUI	Inapplicable	Subpart Db compliance and performance test methods and procedures for nitrogen oxide emissions.	EUI is not subject to any of the standards for nitrogen oxides.
§60.46b(e)-(g)	EUI	Inapplicable	Subpart Db compliance and performance test methods and procedures for nitrogen oxides.	EUI is not subject to any of the standards for nitrogen oxides.
§60.46b(h)	EUI	Inapplicable	Subpart Db schedule for initial and subsequent performance tests of affected facilities subject to §60.44b(j).	EUI is not subject to §60.44b(j).
§60.47b (all)	EUI	Inapplicable	Subpart Db requirements for monitoring compliance with sulfur dioxide standards.	EUI is not subject to any of the Subpart Db sulfur dioxide standards.

TABLE 9.1 Requirements Determined Inapplicable or Exempt Unless Triggered by Action or Emission Increase (continued)

Requirement(s)	Emissions Unit(s)	Exempt or Inapplicable	Brief Description of Requirement	Basis
§60.48b(b)-(d)	EUI	Inapplicable	Subpart Db requirements for monitoring compliance with nitrogen oxide standards.	EUI is not subject to any of the Subpart Db nitrogen oxide standards.
§60.48b(e)(2) & (e)(3)	EUI	Inapplicable	Contains provisions for monitoring emissions of nitrogen oxides.	EUI is not subject to nitrogen oxide emissions monitoring requirements under 40 CFR Part 60, Subpart Db.
§60.49b(a)(2) & (a)(4)	EUI	Inapplicable	Reporting and recordkeeping requirements for fuel mixtures and for emerging technologies.	These requirements pertain to sulfur dioxide emissions controls which are not applicable to EUI.
§60.48b(f)-(i)	EUI	Inapplicable	Subpart Db requirements for monitoring compliance with nitrogen oxide standards.	EUI is not subject to any of the Subpart Db nitrogen oxide standards.
§60.49b(c)	EUI	Inapplicable	Subpart Db reporting and recordkeeping requirements specific to nitrogen oxide standards.	EUI is not subject to any of the Subpart Db nitrogen oxide standards.
§60.49b(d)	EUI	Inapplicable	Subpart Db requirements for determining the capacity factor of each type of fuel combusted by an affected facility.	This requirement is inapplicable since EUI combusts only wood fuel.
§60.49b(e)	EUI	Inapplicable	Subpart Db record keeping requirements specific to affected facilities that burn residual oil.	EUI is not permitted to burn residual oil.
§60.49b(g)	EUI	Inapplicable	Subpart Db recordkeeping requirements specific to affected facilities subject to nitrogen oxide standards under §60.44b.	EUI is not subject to nitrogen oxide standards under §60.44b.
§60.49b(h)(2)&(4)	EUI	Inapplicable	These sections contain Subpart Db reporting requirements specific to affected facilities subject to nitrogen oxide standards under §60.44b.	EUI is not subject to nitrogen oxide standards under §60.44b.
§60.49b(o)	EUI	Obsolete	Subpart Db requirements for retaining records.	The Subpart Db record retention requirement of 2 years is rendered obsolete by the WAC 173-401-615 (2)(c) retention requirement of 5 years.

TABLE 9.1 Requirements Determined Inapplicable or Exempt Unless Triggered by Action or Emission Increase (continued)

Requirement(s)	Emissions Unit(s)	Exempt or Inapplicable	Brief Description of Requirement	Basis
§60.49b (i)-(n)&(p)-(r)	EUI	Inapplicable	Subpart Db recordkeeping and reporting requirements specific to nitrogen oxide and sulfur dioxide standards.	EUI is not subject to either nitrogen oxide or sulfur dioxide standards under Subpart Db.
§60.49b(s),(t) & (u)	EUI	Inapplicable	Subpart Db facility specific standards.	These sections contain standards applicable to specific facilities other than Weyerhaeuser.
40 CFR Part 60, Subpart D	EUI	Inapplicable	40 CFR Part 60 Subpart D applies to fossil-fuel and wood-residue fired steam generating units capable of firing fossil fuels at a heat input rate of more than 250 MMBtu/hr and that commenced construction or modification after August 7, 1971 (except it applies to lignite-fired steam generators that commenced construction or modification after December 22, 1976).	EUI is not rated at more than 250 MMBtu/hr; therefore, the 40 CFR Part 60 Subpart D does not apply to the EUI.
40 CFR Part 60, Subpart Da	EUI	Inapplicable	40 CFR Part 60 Subpart Da applies to electric utility steam generating units with a heat input rate greater than 250 MMBtu/hr that commenced construction or modification after September 18, 1978. Within Subpart Da electric utility steam generating unit is defined as a steam electric generating unit that is constructed for the purpose of supplying more than one-third of its potential electric output capacity and more than 25 MW electrical output to any utility power distribution system for sale.	EUI does not have the capability to generate electricity, therefore, Subpart Da does not apply.
40 CFR Part 60, Subpart Dc	EUI	Inapplicable	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr) which commenced construction, modification or reconstruction after June 9, 1989.	EUI has a maximum design heat input capacity greater than 100 MMBtu/hr.

TABLE 9.1 Requirements Determined Inapplicable or Exempt Unless Triggered by Action or Emission Increase (continued)

Requirement(s)	Emissions Unit(s)	Exempt or Inapplicable	Brief Description of Requirement	Basis
40 CFR Part 60 Subpart Cb	EU1	Inapplicable	Emission guidelines and compliance times for Large Municipal Waste Combustors that are constructed on or before September 20, 1994. The designated facility to which these guidelines apply is each municipal waste combustor unit with a combustion capacity greater than 250 tons per day of municipal solid waste for which construction was commenced on or before September 20, 1994.	Weyerhaeuser does not burn any fuel meeting the applicable definition of municipal solid waste (the applicable definition is found in 40 CFR Part 60 Subpart Eb); therefore, this standard does not apply to the Wellons hog fuel boiler nor any other emission units at Weyerhaeuser Raymond.
40 CFR Part 60 Subpart Eb	EU1	Inapplicable	Standards of performance for large municipal waste combustors for which construction is commenced after September 20, 1994 or for which modification or reconstruction is commenced After June 19, 1996. The affected facility to which this subpart applies is each municipal waste combustor unit with a combustion capacity greater than 250 tons per day of municipal solid waste for which construction, modification, or reconstruction is commenced after September 20, 1994.	Weyerhaeuser does not burn any fuel meeting the applicable definition of municipal solid waste (the applicable definition is found in 40 CFR Part 60 Subpart Eb); therefore, this standard does not apply to EU1 nor any other emission units at Weyerhaeuser Raymond.
40 CFR Part 60 Subpart Ec	EU1	Inapplicable	Standards of performance for Hospital/Medical/Infectious Waste Incinerators for which construction is commenced after June 20, 1996. The affected facility to which this subpart applies is each individual hospital/medical/infectious waste incinerator (HMIWI) for which construction is commenced after June 20, 1996 or for which modification is commenced after March 16, 1998.	In this case, there are no emission units at Weyerhaeuser Raymond that burn Hospital/Medical/Infectious waste; therefore, this standard does not apply to emission units located at Weyerhaeuser Raymond.

TABLE 9.1 Requirements Determined Inapplicable or Exempt Unless Triggered by Action or Emission Increase (continued)

Requirement(s)	Emissions Unit(s)	Exempt or Inapplicable	Brief Description of Requirement	Basis
40 CFR Part 60 Subpart CCCC	EU1	Inapplicable	Standards of performance for commercial and industrial solid waste incineration units for which construction is commenced after November 30, 1999 or for which modification or reconstruction is commenced on or after June 1, 2001. The affected facility to which this subpart applies is each new incineration unit as defined in §60.2015 that is a commercial or industrial solid waste incinerator (CISWI) unit as defined in §60.2265.	Weyerhaeuser Raymond does not operate any units meeting the definition of CISWI found in Subpart CCCC. Specifically, the definition of CISWI found in Subpart CCCC excludes combustion units that employ a heat recovery device. EU1 (the only emission unit at Weyerhaeuser Raymond that could physically function as a CISWI) employs a heat recovery device; therefore, the requirements of Subpart CCCC do not apply to the EU1.
40 CFR Part 60 Subpart EEEE	EU1	Inapplicable	Standards of performance for other solid waste incineration units for which construction is commenced after December 9, 2004, or for which modification or reconstruction is commenced on or after June 16, 2006. The affected facility to which this subpart applies is each new incineration unit as defined in §60.2886, and other solid waste incinerator (OSWI) unit as defined in §60.2977.	Weyerhaeuser Raymond does not operate any units meeting the definition of OSWI found in Subpart EEEE. Specifically, the definition of OSWI found in Subpart EEEE excludes combustion units that employ a heat recovery device. The EU1 (the only emission unit at Weyerhaeuser Raymond that could physically function as a OSWI) employs a heat recovery device; therefore, the requirements of Subpart EEEE do not apply to EU1.
40 CFR 63 Subpart DDDD	Facility-wide	Inapplicable	NESHAP for Plywood and Composite Wood Products.	The only requirements in 40 CFR 63 Subpart DDDD to which the facility is subject are the initial notification requirements in §63.9(b). These requirements were met by Weyerhaeuser during the initial compliance demonstration in 2004. There are no ongoing requirements in Subpart DDDD to which the facility is subject or to which Weyerhaeuser must demonstrate compliance.
WAC 173-400-105(5)	EU1	Inapplicable	Records, Monitoring, and Reporting: General requirements for records, monitoring and reporting for sources in the state of Washington.	EU1 is subject to the NSPS 40 CFR Part 60, Subpart Db and is, therefore exempt from WAC 173-400-105 according to subsection (g) which exempts sources subject to a federal NSPS.
WAC 173-400-050(2)	EU1	Inapplicable	Emission standards for incineration units.	EU1 burns only clean hog fuel and wood waste from the mill and is, therefore not an incinerator.

TABLE 9.1 Requirements Determined Inapplicable or Exempt Unless Triggered by Action or Emission Increase (continued)

Requirement(s)	Emissions Unit(s)	Exempt or Inapplicable	Brief Description of Requirement	Basis
ORCAA 8.4	EUI	Inapplicable	Requirements for incinerator operation.	EUI burns only clean hog fuel and wood waste from the mill and is, therefore not an incinerator.

Attachment 1

Units and Abbreviations

ABBREVIATIONS AND ACRONYMS

AOP	Air Operating Permit
AP-42	Compilation of Emission Factors, AP-42, Fifth Edition, Volume I, Stationary Point and Area Sources – Published by EPA
ASIL	Acceptable Source Impact Level pursuant to Chapter 173-460 WAC
BACT	Best Available Control Technology
CAA	Federal Clean Air Act
CAM	Compliance assurance monitoring (40 CFR 64)
CFR	Code of Federal Regulations
CO	Carbon monoxide
EPA	United States Environmental Protection Agency
HAP	Hazardous air pollutant listed pursuant to Section 112 FCAA
MACT	Maximum Achievable Control Technology
NESHAPs	National Emission Standards for Hazardous Air Pollutants
NAAQS	National Ambient Air Quality Standard
NO _x	Nitrogen oxides
NOC	Notice of Construction application
NSPS	New Source Performance Standards
NSR	New Source Review
PM	Total particulate matter (includes both filterable particulate matter measured by EPA Method 5 and condensable particulate matter measured by EPA Method 202)
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to 10 micrometers (includes both filterable particulate matter measured by EPA Method 201 or 201A and condensable particulate matter measured by EPA Method 202)
PM _{2.5}	Particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers (includes both filterable particulate matter measured by EPA Method 201 or 201A and condensable particulate matter measured by EPA Method 202)
PSD	Prevention of Significant Deterioration
RACT	Reasonably Available Control Technology
RBLC	RACT/BACT/LEAR Clearinghouse
RCW	Revised Code of Washington
SO ₂	Sulfur Dioxide
SQER	Small Quantity Emission Rate listed in Chapter 173-460 WAC
ORCAA	Olympic Region Clean Air Agency
TAP	Toxic Air Pollutant pursuant to Chapter 173-460 WAC

T-BACT	Best Available Control Technology for toxic air pollutants
VOC	Volatile Organic Compound
WAC	Washington Administrative Code

UNITS OF MEASUREMENT

'	minute (measurement of angle)
"	second (measurement of angle)
°	degree
acfm	actual cubic feet per minute
atm	atmosphere
Bhp	Brake horse power
Btu	British thermal units
cfm	cubic feet per minute
dscfm	dry standard cubic feet per minute
°F	degree Fahrenheit
ft	feet
g	grams
g/s	grams per second
gal	gallon
gr	grain
hr	hour
hp	horsepower
in	inches
K	degree Kelvin
kg	kilograms
km	kilometers
kW	kilowatt
L	liter
lb	pounds
m	meters
M	thousand
min	minute
Mbf	thousand board feet
MMbf	million board feet
MM	million
µg	micrograms
MMBtu	million British thermal units
mmHg	millimeters of mercury
mph	miles per hour
MW	megawatts
ppm	parts per million
ppmvd	parts per million, dry volume
ppb	parts per billion
psi	pounds per square inch
s	second
scfm	standard cubic feet per minute
tpy	tons per year

Attachment 2

The Weyerhaeuser Raymond Lumbermill is located at 51 Ellis St in Raymond, Washington, and produces kiln-dried dimensional lumber. The facility includes the emissions units and other pollutant emitting activities identified in Table A3.1 below and insignificant emissions units as defined in Table A4.1 shown in Attachment 4. More complete technical descriptions of these units and activities are contained in the associated Technical Support Document for Weyerhaeuser Raymond.

Table A3.1- Emission Unit Description

Emission Unit ID#	Description	Exhaust Point ID#	Control Equipment
EU1	Wellons Hog Fuel Boiler: Hog fuel boiler consisting of 2 Wellons fuel cells which burn wood residuals to generate steam for dry kilns. The Wellons hog fuel boiler system is rated at 80,000 pounds of steam per hour.	EP1.1	Multiclone & Electrostatic precipitator
EU2	Lumber Drying Kilns: Drying of lumber in steam heated dry kilns.	EP2.1 (kiln 1) EP2.2 (kiln 2) EP2.3 (kiln 3) EP2.4 (kiln 4) EP2.5 (kiln 5) EP2.6 (kiln 6) EP2.7 (kiln 7) EP2.8 (kiln 8)	Computer Controlled Steam Management System
EU3	Planer Mill: Transfer of wood materials from the planer mill including sawdust, planer shavings, and wood chips. Emissions include fugitive emissions and emissions from the baghouses. Baghouse #1 (Planer Mill Clarke Baghouse) Baghouse #2 (Planer Mill Carter-Day Baghouse) Package Saw Shaker Baghouse The cyclones in the Planer Mill are considered emission units and are identified as follows: Cyclone #5 (aka Planer Mill Cyclone) Cyclone #6 (located above the dual truck bin)	Cyclones: No cyclone associated with EU3 vents to atmosphere Baghouses: EP3.1 (Baghouse #1) EP3.2 (Baghouse #2)	Cyclone #5 is controlled by Baghouse #1 (Planer Mill Clarke Baghouse) Cyclone #6 is controlled by Baghouse #2 (Carter Day Baghouse)
EU4	Sawmill: Transfer of wood materials from the sawmill including sawdust, wood chips, and hog fuel. Emissions include fugitive emissions and emissions from the Sawmill Baghouse. The band saw filing room has a baghouse to capture particulates vented from the filing operations. There are no cyclones associated with EU4.	Cyclones: None Baghouses: EP4.1 (Sawmill Baghouse)	Sawmill Baghouse

Table A3.1- Emission Unit Description

Emission Unit ID#	Description	Exhaust Point ID#	Control Equipment
EU5	<p>Hog Fuel System: Transfer of hog fuel from the various pick-up points to the hog fuel boiler. Emissions include fugitive emissions and emission from the Powerhouse Clarke Baghouse.</p> <p>The cyclones in the Power House are considered emission units and are identified as follows:</p> <p>Cyclone #2 Atlas Bin Cyclone (Out of Service) Cyclone #7 Wellons Bin Cyclone (Out of service) Cyclone #8 No name Planer Cyclone (out of service) Cyclone #11 Hog Fuel Pile Cyclone Cyclone #15 Shavings Building Cyclone (Out of service) Cyclone #21 Dust Catch Cyclone Planer Shavings Cyclone (no number assigned)</p>	EP5.1 (Powerhouse Baghouse)	Powerhouse Baghouse

Attachment 3

Table A3.2 - Insignificant Emission Units

Process #	IEU Name	Basis for IEU Designation
Sawmill	Log infeed decks	WAC 173-401-530(1)(d)
	Cut-off saw	WAC 173-401-530(1)(d)
	Sawdust bunk overflow	WAC 173-401-530(1)(d)
	Sawdust conveyor	WAC 173-401-530(1)(d)
	Sawdust bin	WAC 173-401-530(1)(d)
	Green chip conveyor	WAC 173-401-530(1)(d)
	Chip bins	WAC 173-401-530(1)(d)
	Debarker	WAC 173-401-532(113)
	Log yard vehicle dust	WAC 173-401-530(1)(d)
	Log storage	WAC 173-401-530(1)(d)
	Hog	WAC 173-401-532(113)
	Chipper	WAC 173-401-532(112)
	Building vents and openings	WAC 173-401-532(46)
	<u>Filing room heats a melting pot of babbit for saw blade repairs.</u>	<u>WAC 173-401-532 (15)</u>
Powerhouse	Conveyor to hog fuel pile	WAC 173-401-530(1)(d)
	Yard hog	WAC 173-401-532(112)
	Yard hog conveyor to pile	WAC 173-401-530(1)(d)
	Ash handling	WAC 173-401-530(1)(d)
Lumber drying	Steam condensate tank vent	WAC 173-401-532(87)
Planer mill	Shavings bin	WAC 173-401-530(1)(d)
	Chipper	WAC 173-401-532(112)
	Building vents and openings	WAC 173-401-532(46)
Maintenance	Air exhaust from grinding	WAC 173-401-532(46)
	Oil vapor separators	WAC 173-401-532(88)
	Machine/maint. ceiling fans	WAC 173-401-532(46)
	Maintenance hood	WAC 173-401-532(9)
	<u>Personnel lift equipment uses electric batteries</u>	<u>WAC 173-401-532 (77)</u>
Miscellaneous	Compressor exhaust vents	WAC 173-401-532(88)
	Compressor air dryer vent	WAC 173-401-532(88)
	Office activities	WAC 173-401-532(49)
	Diesel engine for fire	WAC 173-401-532(52)
	Finished lumber storage	WAC 173-401-530(1)(d)
	Paved/unpaved road dust	WAC 173-401-530(1)(d)
	Mobile transport tanks on vehicles	WAC 173-401-532(2)
	Lube oil tanks	WAC 173-401-532(3)
	Storage tanks and equipment for non-odorous, non-volatile materials	WAC 173-401-532(4)
	Pressurized storage of O ₂ , N ₂ , CO ₂ , air, inert gases	WAC 173-401-532(5)
	Storage of solid material, dust free handling	WAC 173-401-532(6)
	Vents from areas with permitted units having own exhaust	WAC 173-401-532(9)
	IC vehicle engines	WAC 173-401-532(10)
	Recreational fires	WAC 173-401-532(11)
Metal cutting/soldering, HAP-free	WAC 173-401-532(12)	

Table A3.2 - Insignificant Emission Units

Process #	IEU Name	Basis for IEU Designation
	Routine housekeeping	WAC 173-401-532(33)
	Street cleaning, sweeping	WAC 173-401-532(35)
	Steam cleaning	WAC 173-401-532(39)
	Portable drums, totes	WAC 173-401-532(42)
	Lawn, landscaping activities	WAC 173-401-532(43)
	Emergency flares	WAC 173-401-532(44)
	Vehicle maintenance (including exhaust)	WAC 173-401-532(45)
	Sanitary storm vents	WAC 173-401-532(47)
	Bathroom vents	WAC 173-401-532(48)
	Personal care activities	WAC 173-401-532(50)
	Lab sampling connections	WAC 173-401-532(51)
	Fuel, exhaust from parking lots	WAC 173-401-532(54)
	Material working with no outlet to atmosphere	WAC 173-401-532(55)
	Demineralization, de-aeration of H ₂ O	WAC 173-401-532(61)
	Structural changes, no air emissions	WAC 173-401-532(67)
	Lubricant handling	WAC 173-401-532(69)
	Sample gathering, preparation	WAC 173-401-532(73)
	Repair and maintenance activities	WAC 173-401-532(74)
	Solid waste containers	WAC 173-401-532(79)
	Wire strippers	WAC 173-401-532(82)
	Totally enclosed conveyors	WAC 173-401-532(86)
	Steam leaks	WAC 173-401-532(89)
	Clean condensate tanks	WAC 173-401-532(96)
	Vacuum system exhausts	WAC 173-401-532(108)
	Non-PCB oil containers (not tanks)	WAC 173-401-532(118)
	Wastewater treatment system units	WAC 173-401-532(120)

APPENDIX B: REDLINED TECHNICAL SUPPORT DOCUMENT



Technical Support Document for Weyerhaeuser Raymond

Olympic Region Clean Air Agency
2940 B Limited Lane NW
Olympia, WA 98502
(360) 586-1044 or 1-800-422-5623

PERMIT NO: 04AOP387

ISSUANCE DATE: February 4, 2008

EXPIRATION DATE: February 4, 2013

PERMITTEE & MAILING ADDRESS: Weyerhaeuser NR Raymond Lumbermill
51 Ellis St
Raymond, WA 98577

FACILITY LOCATION: 51 Ellis St
Raymond, WA 98577

FACILITY DESCRIPTION: Lumber Manufacturer

ORCAA FILE #: 475

PRIMARY SIC: 2421

Table of Contents

SECTIONS

1.0 Disclaimer.....	1
2.0 Process Descriptions.....	1
3.0 Emission Unit Summary.....	5
4.0 Actual Emissions 2004.....	13
5.0 Regulatory Determinations.....	14
6.0 Notices of Construction.....	20
7.0 Statement of Basis.....	29
Attachment 1: Figure A1.1 – General Site Plan for the Weyerhaeuser Raymond Lumbermill	

TABLES

Table 3.1 Emission Unit Summary.....	9
Table 3.2 Insignificant Emission Units.....	11
Table 4.1 Facility Wide Actual Emissions of Criteria Pollutants.....	13
Table 5.1 Applicability of New Source Performance Standards (NSPS).....	14
Table 5.2 Applicability of National Emission Standards for Hazardous Air Pollutants.....	18
Table 6.1 Summary of Air Regulatory History.....	20
Table 7.1 Statement of Basis.....	29

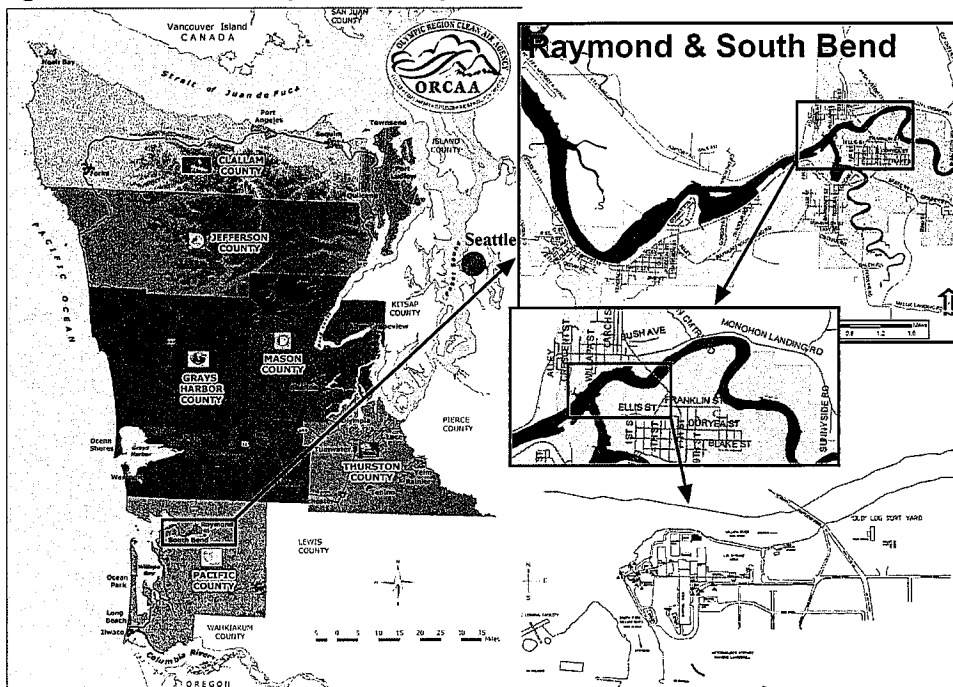
1.0 Disclaimer

Information contained in this Technical Support Document and Statement of Basis is for purposes of background information only and is not enforceable. Applicable requirements including emission limits and monitoring, recordkeeping and reporting requirements are contained in the Weyerhaeuser NR Company Raymond Lumbermill Air Operating Permit (AOP).

2.0 Process Description

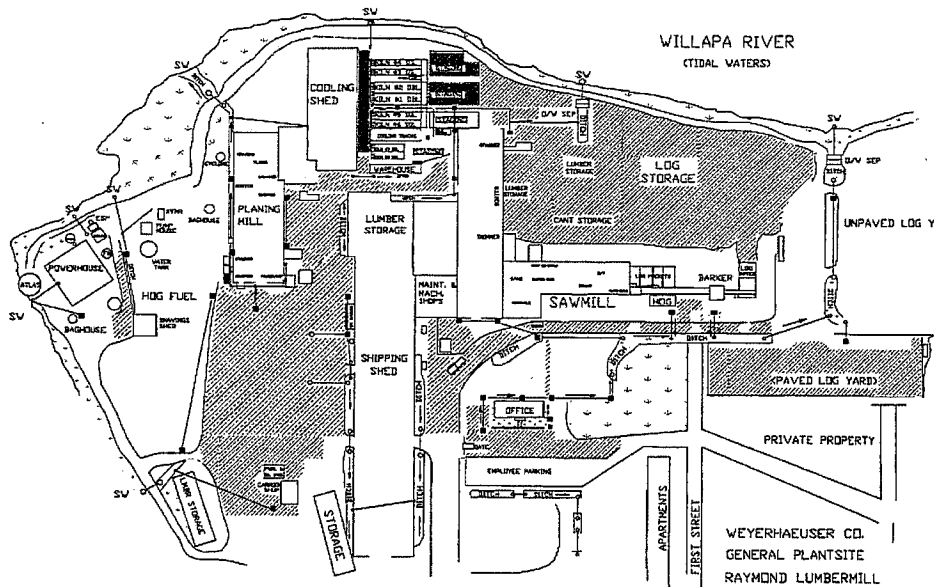
The Weyerhaeuser NR Company operates a softwood lumbermill in Raymond, Washington. The lumber mill is referred to as Weyerhaeuser Raymond and is located at the end of Ellis Street, due West of the US 101 bridge over the Willapa River. Figure 2.1 shows the location of Weyerhaeuser Raymond.

Figure 2.1 – Location of Weyerhaeuser Raymond Lumbermill



Weyerhaeuser Raymond produces kiln dried lumber and several other products from wood residuals generated in the milling process such as wood chips, sawdust and planer shavings. For purposes of describing the mill and defining emission units in the AOP, operations and equipment are grouped in the following categories: lumber mill operations; lumber drying; planing mill operations; and, powerhouse operations. Figure 2.2 shows the layout of Weyerhaeuser Raymond.

Figure 2.2 – General Site Layout of Weyerhaeuser Raymond



The Lumber mill

In the lumber mill, raw logs are delivered by truck and are unloaded using a log stacker. The raw logs are either sent directly to the sawmill or stored in the log storage yard for future use. Logs begin the milling process at the log deck, where they are transferred first to the cutoff saw for removal of unwanted fiber and then to the debarker for bark removal. The removed bark is transferred by conveyor to the hog, where it is ground into fuel and then pneumatically blown to the fuel storage pile near the powerhouse. Alternatively, there is a by-pass chute that diverts bark to a re-entry pile if the hog is experiencing down time. From the debarker, the logs are sent either to the bucking operation to be cut into specified lengths or directly to the log sort pockets before entering the primary breakdown unit. The primary breakdown unit makes cants and sideboards from the log segments. The sideboards are processed through an edger while the cants are processed through a gang saw to make rough green lumber. Trimmings from the edging operation are sent to a chipper. The rough green lumber then is processed through a trimmer to cut the lumber to desired lengths and remove any defects. From the trimmer the lumber is sent to a sorter, where it is separated according to length and width, and then to a stacker, where it is arranged into packages to be dried at the kilns.

Wood residuals such as sawdust and chips are transferred by conveyors to an indoor screening process and then to outside storage bins. From there, they are loaded into trucks and transferred to points of sale.

Periodically, operations require that sawdust be sent outside to an uncovered storage bunk. This sawdust is eventually transferred to the powerhouse fuel pile to be used as boiler fuel.

Lumber Drying

Rough green lumber is transported by fork lifts from the sawmill to the dry kiln staging area where the packages are stacked onto kiln cars before being pushed on tracks into the kiln for drying. The kilns use indirect steam heat for drying the lumber. A lumber "conditioning" process uses steam and water mist. All steam used in the drying process is generated at the wood residual-fired boiler at the powerhouse. After the lumber is dried, it is removed from the kilns and stored on tracks in a cooling shed until it is taken to the planing mill for further processing.

Planing Mill

Rough dried lumber is delivered to the planer where it is surfaced to specified sizes. This process generates shavings that are used as fuel. The surfaced lumber moves through a series of grading tables where it is graded for quality and is then sent to a trimmer for removal of defects. Defect trim pieces are transferred by conveyor to a chipper. From the chipper, the chips are sent to a screen to separate chip sizes. Proper sized chips are blown pneumatically to the hog fuel storage pile where they are mixed with the hog fuel and burned in the boiler as fuel. Over sized chips are sent back to the chipper where they go through a repeat process.

Trimmed and graded lumber is sent to a sorter for separation by length and grade. The finished lumber is sent to a stacker and then to a strapper/paperwrap section where it is packaged for shipment. Forklifts remove the completed packages and store them for shipment either indoors or outdoors depending on the grade of the lumber.

Steam Production

Weyerhaeuser Raymond operates a Wellons hog fuel boiler that has a rated capacity of 80 thousand pounds per hour of saturated steam. Most of the wood residuals used for fuel by the boiler are generated from the sawmill's debarking process. Residual bark passes through a hogging operation before being pneumatically blown to the powerhouse storage bin or to the wood residual pile. Hog fuel from de-barking operations is supplemented with residuals from milling and planing operations as well as purchased wood fuel from outside sources. This purchased fuel is trucked in to the fuel pile and dumped. Mobile equipment moves or feeds the fuel into a conveyor leading to the storage bin. Fuel from the storage bin is transferred by conveyor to a metering bin where it is mixed with shavings. The boiler infrequently burns oily wood residuals and booms along with the regular wood residual fuel.

Hot gases from the burning process pass to a boiler where steam is generated for the dry kilns. Particulate and gases from the boiler operation pass through a multiclone and then through an electrostatic precipitator for removal of particulate prior to discharge to the atmosphere through a stack.

Various cyclones are used for handling materials that are used as fuel for steam production in the powerhouse. Cyclones associated with fuel delivery to the powerhouse include cyclone #15 (shavings building cyclone), #7 (Wellons bin cyclone, out of service), #11 (hog fuel pile cyclone), #21 (cyclone separating powerhouse baghouse catch), and cyclone #8 (cyclone separating Wellons

bin material, out of service). Out of all these cyclones, only #11 emits directly to the atmosphere. Emissions from #7, #8, #15 and #21 go to the powerhouse baghouse for control before exhausting to the atmosphere. Therefore, the powerhouse baghouse serves as the control device for these cyclones. The solid material catch from the powerhouse baghouse located on the storage bins, metering bins, and the shavings storage building, are attached to a system that collects dust at a baghouse located near the powerhouse. The baghouse filter bags are changed and laundered as needed. A replacement set of bags is always ready for the change-out process.

Maintenance Activities

Maintenance activities are performed as needed at the various process areas. Saw and knife sharpening for the sawmilling operations are performed at a filing room at the sawmill. Knife sharpening is conducted at the grinding room at the planing mill. Exhaust from these processes are confined to the filing room operating area.

A maintenance and machine shop provides facilities for milling operations and has wood and metal construction work areas as well. A small lumber mill vehicle maintenance shop provides facilities for the repair of log stacking equipment, forklifts, and small vehicles.

Miscellaneous Activities

Miscellaneous emissions at the facility encompass a wide range of units and activities, including but not limited to air compressors, a backup diesel engine for fire protection, rough and finished lumber storage, loading/unloading of trucks, office activities, and various paved and unpaved roads and parking lots.

3.0 Emission Unit Summary

3.1 Boiler (EU1)

The Wellons boiler is designated as Emission Unit 1 (EU1). EU1 consists of a Wellons two cell hog fuel boiler system and air pollution controls including a multiclone separator followed by an electrostatic precipitator (ESP). The Wellons boiler was installed in 1996 under NOC 96NOC646. The Wellons boiler is rated at 80 thousand pounds per hour of saturated steam at 200 psig. The maximum rated heat input of the boiler is 115 million Btu/hr.

Boiler emissions are controlled by a multiclone separator followed by a two field electrostatic precipitator. The boiler is subject to requirements under Subpart Db of 40CFR Part 60 and the federal compliance assurance monitoring (CAM) requirements under 40 CFR Part 64 as well as general requirements under Chapter 173-400 WAC and ORCAA Regulations. In addition, the Order of Approval for the boiler contains opacity, particulate, NO_x, and CO performance limits for the boiler. For particulate emissions, Condition 3 of the Order specifies a grain loading limit of 0.02 gr/dscf which is slightly more stringent than the federal performance standard in Subpart Db. Condition 4 of the Order requires that opacity not exceed 10% for three minutes in any one hour except during periods of start-up, shutdown, or during equipment malfunctions. Condition 8 of the order requires continuous opacity monitoring using an opacity monitor certified according to Performance Specification #1 in 40CFR Part 60 (Appendix B). Limits for NO_x and CO emissions are established by Conditions 5 and 6 respectively.

Weyerhaeuser Raymond has complied with the initial notification requirements of 40 CFR Part 60, subpart Db. Notification of the date of construction and anticipated date of initial start-up [requirements under §60.7(a)(1)&(2)] were provided to ORCAA through Weyerhaeuser Raymond's NOC application for the new boiler. Formal notification of the actual date of initial start-up [required by §60.49b(a)] occurred on August 5, 1996. ORCAA was notified of the date of initial compliance source testing on August 26, 1996 [required by §60.8(d)].

Weyerhaeuser Raymond has complied with the initial performance testing requirements of 40 CFR Part 60, Subpart Db. Stack testing of the hog fuel boiler emissions of particulates, CO and NO_x as well as opacity was conducted on September 18, 1996. Testing results were forwarded to ORCAA on October 11, 1996 [required by §60.49b(b)]. The initial test results confirmed compliance with Subpart Db limits for particulates and opacity, and particulate, NO_x, CO and opacity limits established in the NOC Approval Order for the new boiler. Prior to conducting the initial stack test, Weyerhaeuser Raymond provided a performance evaluation and other information on the continuous opacity monitoring system (COMS) verifying that the COMS met the requirements of §60.48b(a) [required by §60.49b(b)].

Section §60.49b(h) in 40 CFR Part 60, Subpart Db requires Weyerhaeuser Raymond to submit excess emission reports for any calendar quarter during which there are excess emissions or a semiannual report stating that there were no excess emissions during the period. Weyerhaeuser Raymond has been consistent to date in complying with §60.49b(h) by submitting such reports directly to ORCAA. It is ORCAA's understanding, based on consultation with staff from EPA Region 10, that the reports required under 40 CFR Part 60, Subpart Db need only be submitted to the delegated regulatory authority which in this case is ORCAA. As such, ORCAA considers

Weyerhaeuser Raymond to be in compliance with all Subpart Db reporting requirements to date.

Table 4.1 shows actual emissions from the mill for 2006. Actual 2006 emissions were calculated using emission factors derived from stack testing and the actual amount of steam generated during 2006.

Applicability of Compliance Assurance Monitoring Rule

Compliance assurance monitoring (CAM) requirements under 40 CFR Part 64 apply to particulate emissions from ~~Simpson's~~ Weyerhaeuser's hog fuel boiler since:

1. The boiler is subject to a particulate emissions limitation;
2. The boiler relies on air pollution control devices (a muliclone and ESP) to achieve compliance with the limitation; and,
3. The pre-control particulate emissions from the boiler are greater than 100 tons per year.

CAM requirements are incorporated into Weyerhaeuser's permit through conditions 5.2(o), 6.8, 7.3, 7.11, and 8.4. The following table provides a cross reference of CAM requirements with conditions in Weyerhaeuser's AOP.

Comment [NWS1]: Incorrect business title

Table 3.1 CAM Permit Conditions

CAM Requirement Citation	Requirement	AOP Condition
§64.3(a)	General criteria (CAM)	6.13, Table 6.2
§64.3(b)	Performance criteria (CAM)	6.13, Table 6.2
§64.6(c)	Permit requirements	6.13
§64.7(a)	Commencement of Operation. The owner or operator shall conduct the monitoring required under this part upon issuance of a part 70 or 71 permit...	6.13(a)
§64.7(b)	Proper Maintenance. At all times the owner or operator shall maintain the monitoring, including but not limited to maintaining necessary parts for routine repairs...	5.1(t)
§64.7(c)	Continued Operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities... the owner or operator shall conduct all monitoring in continuous operation...	6.13(b)
§64.7(c)	... Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part...	6.13(c)
§64.7(d)	Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device) to its normal or usual manner of operation...	5.1(u)
§64.7(e)	Documentation of need for improved monitoring.	8.12
§64.8	Quality Improvement Plan Required	6.13(e)
§64.9(a)	General reporting requirements.	8.4
§64.9(b)	General recordkeeping.	7.10; 7.11; 7.12

3.2 Lumber Dry Kilns (EU2)

The lumber dry kilns are considered collectively as Emission Unit 2 (EU2). Weyerhaeuser Raymond currently has a total of 8 separate lumber dry kilns. Each dry kiln is indirectly heated with steam

Located on the East side of the shipping building is a dedicated planer chip truck bin. The bin is equipped with a target box to separate the chips from the air stream. Emissions from the target box exhaust directly to the atmosphere. The planer chip truck bin is an older unit and NOC approvals could not be found in ORCAA's files. The planer chip truck bin is no longer used; instead chips go to powerhouse where emissions are ultimately controlled by the Powerhouse Baghouse.

3.4 Sawmill (EU4)

Weyerhaeuser Raymond's sawmill operations are located in the sawmill building southeast of the lumber dry kilns. Emissions from the sawmill include particulate emissions from the generation and transporting of residual materials. Sources of particulate emissions associated with the sawmill are considered as Emission Unit 4 (EU4) and include the sawmill baghouse, sawdust truck bin, and green chip bins.

Wet or "green" residual materials are generated during debarking, milling, chipping and screening operations within the sawmill and are transported to either truck bins for sale or to the powerhouse area for use as fuel. Bark from debarking operations is first processed in the bark hog and then pneumatically transferred to Cyclone #11. Cyclone #11 separates the hog fuel on to the hog fuel pile. Cyclone #11 emissions exhaust directly to the atmosphere. Hog fuel consisting of bark is the predominant fuel consumed by Weyerhaeuser's boiler.

As the logs are processed, sawdust and larger residuals are generated. Throughout the sawmill, sawdust and fines are separated from larger residuals by screening. Accumulated sawdust is then transported via conveyor belts to a sawdust truck bin located adjacent to the sawmill building. The sawdust truck bin is considered as an emission point of EU4. Particulate emissions are generated as sawdust is unloaded into transport trucks. However, emissions are minimal due to the nature of this material which is derived from "green" (not dried) timber.

Waste ends, rejects and "overs" from screening operations are chipped within the sawmill building. The chips are then conveyor transferred to the dual chip bins located adjacent to the sawmill. The chip bins are considered as emission points due to particulate emissions occurring during unloading operations. There are no visible emissions during loading of the bins since the chips are loaded using conveyor belts and since the chips are derived from "green" lumber. Fugitive emissions during unloading of the bins are minimal as well due to the nature of the chips.

The sawmill baghouse processes air streams from hoods located throughout the sawmill. The sawmill baghouse catch is conveyed back into the sawdust stream and eventually to the sawdust truck bin. Emissions from the sawmill baghouse exhaust to the atmosphere. Alternatively, when the sawmill baghouse is malfunctioning, the air streams from sawmill hoods exhaust directly to the atmosphere for an instant while the entire dust collection system switches off. Direct exhaust to the atmosphere minimal since the system automatically shuts down in case of baghouse malfunction.

The sawmill baghouse was approved by ORCAA in 1998 under NOC# 98NOC004. NOC approvals for the chip bins and sawdust bin could not be found in ORCAA's files. These units were built prior to 1975 and it is likely that a NOC was not required by ORCAA for such units at this time.

3.5 Hog Fuel System (EU5)

Cyclones, baghouses and conveyors associated with fuel management are considered as Emission Unit #5 (EU5). EU5 includes cyclones 7, 8, 11, 15, and 21, and the powerhouse baghouse. Out of these units, only cyclone #11 and the powerhouse baghouse exhaust to the atmosphere. Exhaust streams from cyclones 7, 8, 15, and 21 go to the powerhouse baghouse for control of particulate. All units in EU5 either have approved NOCs or are "grandfathered" units.

Table 3.1 - Emission Unit Summary

Emission Unit #	Equipment ID	Description	NOC
EU1 Boiler	Wellons hog fuel boiler	<ul style="list-style-type: none"> Wellons dual cell furnace. 80,000 lbs/hr rated saturated steam 115 MMBtu/hr design heat rate Controls include multiclone followed by 2 field ESP. 	96NOC646 94NOC589
EU2 Kilns	Dry Kiln #1	<ul style="list-style-type: none"> 48 mmbf/yr design capacity 104' x 34' x 27' (ht), double track 	NOC not required
	Dry Kiln #2	<ul style="list-style-type: none"> 48 mmbf/yr design capacity 104' x 34' x 27' (ht), double track 	NOC not required
	Dry Kiln #3	<ul style="list-style-type: none"> 24 mmbf/yr design capacity 104' x 34' x 27' (ht), single track shares common wall with #4 <u>Hemlock species</u> 	94NOC570
	Dry Kiln #4	<ul style="list-style-type: none"> 24 mmbf/yr design capacity 104' x 34' x 27' (ht), single track shares common wall with #3 <u>Hemlock species</u> 	94NOC570
	Dry Kilns #5 - #6 identical units	<ul style="list-style-type: none"> 24 mmbf/yr design capacity 104' x 34' x 27' (ht), single tracks <u>Hemlock and Douglas fir species</u> 	95NOC646 95NOC647
	Dry Kilns #7 - #8 (these units are out of service)	<ul style="list-style-type: none"> 13 mmbf/yr design capacity each single track single track kilns with common wall between 68' x 34' x 27' (ht) <u>Hemlock species</u> 	97NOC025
EU3 Planer Mill	Cyclone #5	<ul style="list-style-type: none"> Clark Pneu-Aire, 65,000 acfm catch to cyclone #6 or cyclone #7 exhaust to planer mill #1 (Clark) baghouse alternatively may exhaust to atm when #1 baghouse is malfunctioning. 	95NOC553 95NOC554
	Cyclone #6 (shavings bin)	<ul style="list-style-type: none"> Shavings bin cyclone Grandfathered unit (no NOC) processes catch from cyclone #5 exhausts to the Carter day baghouse(#2) catch empties into shavings truck bin 	none
	Planer Chip Truck Bin (dual bin)	<ul style="list-style-type: none"> Planer chips blown to chip truck bin target box. Exhausts directly to atm. 	none
	"Green" Planer Shavings Truck Bin	<ul style="list-style-type: none"> Green planer shavings blown to knock-out box above truck bin. Grandfathered unit (no NOC) 	none

Comment [NWS2]: Units are in operation

Table 3.1 - Emission Unit Summary

Emission Unit #	Equipment ID	Description	NOC
	Baghouse #1 (Clarke baghouse)	<ul style="list-style-type: none"> Clarke baghouse, Model 40-20 65,000 acfm 100 x 20' bags reverse air cleaning system pressure drop 1-3.5 inches water processes exhaust from cyclone #5 catch to baghouse #Carter Day baghouse. emergency abort gate bypasses unit and exhausts directly to atm. 	95NOC553 95NOC554
	Baghouse #2 (Carter Day baghouse)	<ul style="list-style-type: none"> Carter Day, Mod# 144RJ120 38,250 reverse air pressure drop 2-5 inches water processes catch from baghouse #1, exhaust from cyclone #6 and emissions from planing mill. emergency abort gate bypasses unit and exhausts directly to atm. 	96NOC031
EU4 Sawmill	Sawmill Baghouse (Superior Systems)	<ul style="list-style-type: none"> Superior Systems, Mod# 12-138-12 44,793 acfm purged air pressure drop emergency abort system shuts down sawmill dust collection during baghouse malfunctions. 	98NOC004
	Sawdust Truck Bin	fugitive dust emissions during truck loading	none
	Dual Chip Bin	fugitive dust emissions during truck loading	none
EU5 Hog Fuel System	Powerhouse Baghouse	Controls emissions from cyclones 2, 7, 8, 15, and 21 <ul style="list-style-type: none"> Clark baghouse Mod# 40-20 15,590 acfm reverse air cleaning system pressure drop 0.75 - 3.5 inches water effective cloth area of 2668 ft² 10 oz. Polypropylene felt bags 	06NOC467
	Cyclone #7 (The Wellons Bin Cyclone is out of service)	<ul style="list-style-type: none"> Wellons Bin Cyclone Make: unknown, Mod#: unknown 8636 acfm processes residuals from the planing mill catch goes to Wellons bin exhaust goes to powerhouse baghouse 	1975 NOC approval
	Cyclone #8 (Out of service)	<ul style="list-style-type: none"> Make: unknown, Mod#: unknown 1627 acfm processes residuals stored in Wellons bin which is pneumatically transported to cyclone #8. catch goes to the wet fuel belt exhaust goes to the powerhouse baghouse 	1975 NOC approval

Table 3.1 - Emission Unit Summary

Emission Unit #	Equipment ID	Description	NOC
	Cyclone #11 (Hog Fuel Pile Cyclone)	<ul style="list-style-type: none"> Hog Fuel Pile Cyclone Make: Sutorbilt, Mod#: 1437-3100 8266 acfm processes hog fuel from sawmill catch goes to conveyor and drops to hog fuel pile exhaust goes to atm. 	76NOC112
	Cyclone #15 (Shavings Building Cyclone)	<ul style="list-style-type: none"> Shavings Building Cyclone grandfathered unit Make: Sutorbilt, Mod #: 22x60 HD (serial# 140) 8636 acfm processes residuals from planing mill catch drops directly to shavings building exhaust goes to powerhouse baghouse 	none
	Cyclone #21 (powerhouse dust cyclone)	<ul style="list-style-type: none"> Superior Systems, Mod# SSI-SL-5 5150 acfm processes catch from powerhouse baghouse catch goes to wet fuel belt exhaust goes to powerhouse baghouse 	96NOC031

Comment [NWS3]: Not in service

Table 3.2 - Insignificant Emission Units

Process #	IEU Name	Basis for IEU Designation
Sawmill	Log infeed decks	WAC 173-401-530(1)(d)
	Cut-off saw	WAC 173-401-530(1)(d)
	Sawdust bunk overflow	WAC 173-401-530(1)(d)
	Sawdust conveyor	WAC 173-401-530(1)(d)
	Sawdust bin	WAC 173-401-530(1)(d)
	Green chip conveyor	WAC 173-401-530(1)(d)
	Chip bins	WAC 173-401-530(1)(d)
	Debarker	WAC 173-401-532(113)
	Log yard vehicle dust	WAC 173-401-530(1)(d)
	Log storage	WAC 173-401-530(1)(d)
	Hog	WAC 173-401-532(113)
	Chipper	WAC 173-401-532(112)
	Building vents and openings	WAC 173-401-532(46)
	Filing room heats a melting pot of babbitt for saw blade repairs	WAC 173-401-532(15)
Powerhouse	Conveyor to hog fuel pile	WAC 173-401-530(1)(d)
	Yard hog	WAC 173-401-532(112)
	Yard hog conveyor to pile	WAC 173-401-530(1)(d)
	Ash handling	WAC 173-401-530(1)(d)
Lumber drying	Steam condensate tank vent	WAC 173-401-532(87)
Planer mill	Shavings bin	WAC 173-401-530(1)(d)
	Chipper	WAC 173-401-532(112)
	Building vents and openings	WAC 173-401-532(46)
Maintenance	Air exhaust from grinding	WAC 173-401-532(46)
	Oil vapor separators	WAC 173-401-532(88)
	Machine/maint. ceiling fans	WAC 173-401-532(46)
	Maintenance hood	WAC 173-401-532(9)

Comment [R4]: Nancy: you may want to replace these with a concise IEU name.

Comment [NWS5]: Okay as worded

Table 3.2 - Insignificant Emission Units

Process #	IEU Name	Basis for IEU Designation
Miscellaneous	Compressor exhaust vents	WAC 173-401-532(88)
	Compressor air dryer vent	WAC 173-401-532(88)
	Office activities	WAC 173-401-532(49)
	Diesel engine for fire	WAC 173-401-532(52)
	Finished lumber storage	WAC 173-401-530(1)(d)
	Paved/unpaved road dust	WAC 173-401-530(1)(d)
	Mobile transport tanks on vehicles	WAC 173-401-532(2)
	Lube oil tanks	WAC 173-401-532(3)
	Storage tanks and equipment for non-odorous, non-volatile materials	WAC 173-401-532(4)
	Pressurized storage of O ₂ , N ₂ , CO ₂ , air, inert gases	WAC 173-401-532(5)
	Storage of solid material, dust free handling	WAC 173-401-532(6)
	Vents from areas with permitted units having own exhaust	WAC 173-401-532(9)
	IC vehicle engines	WAC 173-401-532(10)
	Recreational fires	WAC 173-401-532(11)
	Metal cutting/soldering, HAP-free	WAC 173-401-532(12)
	Routine housekeeping	WAC 173-401-532(33)
	Street cleaning, sweeping	WAC 173-401-532(35)
	Steam cleaning	WAC 173-401-532(39)
	Portable drums, totes	WAC 173-401-532(42)
	Lawn, landscaping activities	WAC 173-401-532(43)
	Emergency flares	WAC 173-401-532(44)
	Vehicle maintenance (including exhaust)	WAC 173-401-532(45)
	Sanitary storm vents	WAC 173-401-532(47)
	Bathroom vents	WAC 173-401-532(48)
	Personal care activities	WAC 173-401-532(50)
	Lab sampling connections	WAC 173-401-532(51)
	Fuel, exhaust from parking lots	WAC 173-401-532(54)
	Material working with no outlet to atmosphere	WAC 173-401-532(55)
	Demineralization, de-aeration of H ₂ O	WAC 173-401-532(61)
	Structural changes, no air emissions	WAC 173-401-532(67)
	Lubricant handling	WAC 173-401-532(69)
	Sample gathering, preparation	WAC 173-401-532(73)
	Repair and maintenance activities	WAC 173-401-532(74)
	Solid waste containers	WAC 173-401-532(79)
	Wire strippers	WAC 173-401-532(82)
	Totally enclosed conveyors	WAC 173-401-532(86)
	Steam leaks	WAC 173-401-532(89)
	Clean condensate tanks	WAC 173-401-532(96)
	Vacuum system exhausts	WAC 173-401-532(108)
	Non-PCB oil containers (not tanks)	WAC 173-401-532(118)
	Wastewater treatment system units	WAC 173-401-532(120)
	Personnel lift equipment uses electric charging batteries	WAC 173-401-532(77)

Comment [R6]: Nancy: you may want to replace these with a concise IEU name.

Comment [NWS7]: Emission is from charging

4.0 Actual Emissions

Emissions at Weyerhaeuser Raymond include particulate matter, nitrogen oxides, carbon monoxide, sulfur dioxide and volatile organic compounds (VOCs). Within the group of compounds emitted by Weyerhaeuser Raymond that are considered VOCs, there are some that are classified as Hazardous Air Pollutants (HAPs), some that are classified as Toxic Air Pollutants (TAPs), some that are both TAPs and HAPs, and some that are only VOCs.

Weyerhaeuser Raymond's actual annual emissions for calendar year 2011~~06~~ are shown in Table 4.1.

Table 4.1 Facility Wide Actual Emissions of Criteria Pollutants¹

Pollutant	2011 06 Emissions (ton/hr)	Emissions Factors
PM _{2.5}	15	EU1 (Boiler): PM ₁₀ and PM _{2.5} Factor Ratios: Ref. EPA AP-42, Table 1.6-1 and Table 1.6-5 (7/01) EU3 (Planer Mill):
PM ₁₀	18	EU1 (Boiler)Boiler: PM ₁₀ and PM _{2.5} Factor Ratios: Ref. EPA AP-42, Table 1.6-1 and Table 1.6-5 (7/01)
NO _x	72	EU1 (Boiler): Emission factor calculated based on the 2004 Stack Test
CO	33	EU1 (Boiler): Emission factor calculated based on the 2004 Stack Test
VOC	9	VOC Factor from Weyerhaeuser (letter 5/30/95 – NOC for Proposed Dry Kilns) and Weyco. Research Report, Project #044-9434, Weyerhaeuser Company Western Lumber Kilns VOC Study May 1994
SO ₂	6	EU1 (Boiler): Emission factor calculated based on the 2004 Stack Test

Comment [R8]: Update these emission totals based on the 2011 emission inventory for the mill.

My count is as follows:

PM2.5 – 6

PM10 – 13

NOx – 66

CO – 56

VOC – 35 (includes VOC as propane; not including VOC as propane, the VOC total is 5)

SO2 – 31

Larry Comment: A value of zero for the SO2 seems unrealistic. AP 42 suggests a value of 2.8 for this size boiler.

¹Annual emissions will vary from year to year based on operational conditions at the facility. Data presented above were summarized from the 2011~~06~~ Annual Emission Inventory submitted to ORCAA in Spring-Winter 2012~~06~~.

5.0 Regulatory Determinations

5.1 Applicability of New Source Performance Standards (NSPS)

Table 5.1 – Applicability of New Source Performance Standards (NSPS)

Standard	Applicability Analysis	Applicability Determination
40 CFR Part 60 Subpart D	<p>Standards of Performance for Fossil-Fuel-Fired Steam Generators This subpart applies to fossil-fuel and wood-residue fired steam generating units capable of firing fossil fuels at a heat input rate of more than 250 MMBtu/hr and that commenced construction or modification after August 7, 1971 (except it applies to lignite-fired steam generators that commenced construction or modification after December 22, 1976).</p> <p>In this case, the Wellons hog fuel boiler is not rated at more than 250 MMBtu/hr; therefore, the standard does not apply to the Wellons hog fuel boiler.</p>	Not Applicable
40 CFR Part 60 Subpart Da	<p>Standards of Performance for Electric Utility Steam Generating Units This subpart applies to electric utility steam generating units with a heat input rate greater than 250 MMBtu/hr that commenced construction or modification after September 18, 1978. Within Subpart Da electric utility steam generating unit is defined as a steam electric generating unit that is constructed for the purpose of supplying more than one-third of its potential electric output capacity and more than 25 MW electrical output to any utility power distribution system for sale.</p> <p>Weyerhaeuser Raymond does not have the capability to generate electricity, therefore, Subpart Da does not apply.</p>	Not Applicable
40 CFR Part 60 Subpart Db	<p>Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units The requirements of 40 CFR Part 60 Subpart Db (Subpart WW) apply to each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity from fuels combusted in the steam generating unit of greater than 29 MW (100 million Btu/hour).</p> <p>In this case, Weyerhaeuser Raymond's Wellons hog fuel boiler has a heat input capacity greater than 100 MMBtu/hr (this unit has a heat input capacity of 115 MMBtu/hr) and was constructed after June 19, 1984 (this unit was constructed in 1996). As a result, the requirements of Subpart Db apply to the Wellons hog fuel boiler.</p>	Applicable
40 CFR Part 60 Subpart Dc	<p>Standards of Performance for Small Industrial Commercial-Institutional Steam Generating Units This subpart applies to each steam generating unit that has a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr and that commenced construction, modification, or reconstruction after June 9, 1989.</p> <p>In this case, the Wellons hog fuel boiler is rated at greater than 100 MMBtu/hr; therefore this standard does not apply to the Wellons hog fuel boiler.</p>	Not Applicable

Table 5.1 – Applicability of New Source Performance Standards (NSPS)

Standard	Applicability Analysis	Applicability Determination
40 CFR Part 60 Subpart Cb	<p>Emission Guidelines and Compliance Times for Large Municipal Waste Combustors That are Constructed on or Before September 20, 1994</p> <p>The designated facility to which these guidelines apply is each municipal waste combustor unit with a combustion capacity greater than 250 tons per day of municipal solid waste for which construction was commenced on or before September 20, 1994.</p> <p>Weyerhaeuser does not burn any fuel meeting the applicable definition of municipal solid waste (the applicable definition is found in 40 CFR Part 60 Subpart Eb); therefore, this standard does not apply to the Wellons hog fuel boiler nor any other emission units at Weyerhaeuser Raymond.</p>	Not Applicable
40 CFR Part 60 Subpart Eb	<p>Standards of Performance for Large Municipal Waste Combustors for Which Construction is Commenced After September 20, 1994 or for Which Modification or Reconstruction is Commenced After June 19, 1996</p> <p>The affected facility to which this subpart applies is each municipal waste combustor unit with a combustion capacity greater than 250 tons per day of municipal solid waste for which construction, modification, or reconstruction is commenced after September 20, 1994.</p> <p>Weyerhaeuser does not burn any fuel meeting the applicable definition of municipal solid waste (the applicable definition is found in 40 CFR Part 60 Subpart Eb); therefore, this standard does not apply to the Wellons hog fuel boiler nor any other emission units at Weyerhaeuser Raymond.</p>	Not Applicable
40 CFR Part 60 Subpart Ec	<p>Standards of Performance for Hospital/Medical/Infectious Waste Incinerators for Which Construction is Commenced After June 20, 1996</p> <p>The affected facility to which this subpart applies is each individual hospital/medical/infectious waste incinerator (HMIWI) for which construction is commenced after June 20, 1996 or for which modification is commenced after March 16, 1998.</p> <p>In this case, there are no emission units at Weyerhaeuser Raymond that burn Hospital/Medical/Infectious waste; therefore, this standard does not apply to emission units located at Weyerhaeuser Raymond.</p>	Not Applicable

Table 5.1 – Applicability of New Source Performance Standards (NSPS)

Standard	Applicability Analysis	Applicability Determination
40 CFR Part 60 Subpart CCCC	<p>Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction is Commenced After November 30, 1999 or for Which Modification or Reconstruction is Commenced on or After June 1, 2001</p> <p>The affected facility to which this subpart applies is each new incineration unit as defined in §60.2015 that is a commercial or industrial solid waste incinerator (CISWI) unit as defined in §60.2265.</p> <p>In this case, Weyerhaeuser Raymond does not operate any units meeting the definition of CISWI found in Subpart CCCC. Specifically, the definition of CISWI found in Subpart CCCC excludes combustion units that employ a heat recovery device. The Wellons hog fuel boiler (the only emission unit at Weyerhaeuser Raymond that could physically function as a CISWI) employs a heat recovery device; therefore, the requirements of Subpart CCCC do not apply to the Wellons hog fuel boiler. And since there are no other emission units physically capable of functioning as a CISWI, the requirements found in Subpart CCCC do not apply to any emission units found at Weyerhaeuser Raymond.</p>	Not Applicable
40 CFR Part 60 Subpart EEEE	<p>Standards of Performance for Other Solid Waste Incineration Units for Which Construction is Commenced After December 9, 2004, or for which Modification or Reconstruction is Commenced on or After June 16, 2006</p> <p>The affected facility to which this subpart applies is each new incineration unit as defined in §60.2886, and other solid waste incinerator (OSWI) unit as defined in §60.2977.</p> <p>In this case, Weyerhaeuser Raymond does not operate any units meeting the definition of OSWI found in Subpart EEEE. Specifically, the definition of OSWI found in Subpart EEEE excludes combustion units that employ a heat recovery device. The Wellons hog fuel boiler (the only emission unit at Weyerhaeuser Raymond that could physically function as a OSWI) employs a heat recovery device; therefore, the requirements of Subpart EEEE do not apply to the Wellons hog fuel boiler. And since there are no other emission units physically capable of functioning as a OSWI, the requirements found in Subpart EEEE do not apply to any emission units found at Weyerhaeuser Raymond.</p>	Not Applicable

5.2 Applicability of National Emission Standard for Hazardous Air Pollutants (NESHAPs)

Title I of the CAA includes provisions for controlling emissions of hazardous air pollutants (HAP). The provisions in Title I that address the control of HAP emissions, or air toxics, are found in Section 112. Section 112 of the CAA includes provisions for the promulgation of NESHAP, or maximum achievable control technology (MACT) standards, as well as several related programs to enhance and support the NESHAP program.

Prior to 1990, the Clean Air Act required EPA to set standards for each toxic air pollutant individually, based on its particular health risks. This approach proved difficult and minimally effective at reducing emissions. As a result, when amending the Clean Air Act in 1990, Congress directed EPA to use a "technology-based" and performance-based approach to significantly reduce emissions of air toxics from major sources of air pollution, followed by a risk-based approach to address any remaining, or residual, risks.

Under the "technology-based" approach, EPA develops standards for controlling the "routine" emissions of air toxics from each major type of facility within an industry group (or "source category"). These standards—known as "maximum achievable control technology (MACT) standards"—are based on emissions levels that are already being achieved by the better-controlled and lower-emitting sources in an industry. This approach assures citizens nationwide that each major source of toxic air pollution will be required to employ effective measures to limit its emissions.

In most cases, the MACT standards apply to major HAP sources within a particular industry group. A major HAP source is a facility with a potential to emit greater than 10 tons per year of any single HAP and more than 25 tons per year of any combination of HAPs.

In this case, Weyerhaeuser Raymond is a major source of HAPs since emissions from the kilns (EU2) are above major source thresholds. Specifically, emissions of acetaldehyde are greater than 10 tons per year.

There are three MACT standards that possibly apply to the type of industry that Weyerhaeuser belongs to. Applicability determinations for these MACTs are shown in Table 5.2.

Table 5.2 – Applicability of National Emission Standards for Hazardous Air Pollutants (NESHAPs)

Standard	Applicability Analysis	Applicability Determination
<p>40 CFR Part 63 Subpart DDDD</p>	<p>National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products</p> <p>The National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products was promulgated on July 30, 2004 and applies to all existing lumber kilns located at a major source of HAPs; or each new or reconstructed lumber kilns located at a major source of HAPs.</p> <p>In this case, Weyerhaeuser Raymond is a major source of hazardous air pollutants (HAPs), and as a major source of HAPs Weyerhaeuser Raymond is subject to the requirements of 40 CFR Part 63 Subpart DDDD.</p> <p><u>The only requirements therein to which the facility is subject are the initial notification requirements in §63.9(b). These requirements were met by Weyerhaeuser during the initial compliance demonstration prior to September 28, 2004. There are no ongoing requirements in Subpart DDDD to which the facility is subject or with which Weyerhaeuser must demonstrate compliance.</u></p>	<p>Applicable</p>

<p>40 CFR Part 63 Subpart DDDDD</p>	<p>National Emission Standards for Hazardous Air Pollutants for Industrial Commercial and Institutional Boilers and Process Heaters</p> <p><u>Subpart DDDDD (commonly referred to as the Boiler MACT) applies to industrial, commercial, and institutional boilers and process heaters at major sources of HAPs. The Wellons Hog Fuel Boiler, designated EU1, is an affected source under this subpart and is subject to the applicable provisions therein.</u></p> <p><u>EPA has proposed a revised version of the Boiler MACT that is expected to be finalized sometime in 2012. The new rule may differ significantly from the existing version of the rule. Weyerhaeuser will comply with the applicable requirements of Subpart DDDDD when those requirements become effective.</u></p> <p><u>The National Emission Standards for Hazardous Air Pollutants for Industrial Commercial and Institutional Boilers and Process Heaters was promulgated on September 13, 2004 and applies to all existing industrial, commercial, or institutional boilers and process heaters located at a major source of HAPs; or each new or reconstructed industrial, commercial or institutional boiler and process heater located at a major source of HAPs.</u></p> <p><u>Weyerhaeuser Raymond is a major source of hazardous air pollutants (HAPs), and as a major source of HAPs Weyerhaeuser Raymond is subject to the requirements of 40 CFR Part 63 Subpart DDDDD. However, on June 8, 2007 the United States Court of Appeals for the District of Columbia issued a decision vacating in its entirety and remanded the Boiler MACT. As a result, the requirements of Subpart DDDDD are not in force at this time.</u></p>	<p>Applicable</p>
<p>40 CFR Part 63 Subpart QQQQ</p>	<p>National Emission Standards for Hazardous Air Pollutants for Wood Building Products</p> <p>The National Emission Standards for Hazardous Air Pollutants for Wood Building Products was promulgated on June 21, 2002 and applies to all new and existing facilities that apply coatings to wood building products and that are located at a major source of HAPs.</p> <p>In this case, Weyerhaeuser Raymond does not apply coatings to any of the products produced at the facility. As a result, Weyerhaeuser Raymond is not subject to the requirements of 40 CFR Part 63 Subpart QQQQ.</p>	<p>Not Applicable</p>

40 CFR Part 63 Subpart HHHHH	<p><u>National Emission Standards for Hazardous Air Pollutants for Miscellaneous Coating Manufacturing</u> <u>The National Emission Standards for Hazardous Air Pollutants for Miscellaneous Coating Manufacturing applies to miscellaneous coating manufacturing operations defined in §63.7985(b) that are used to manufacture coatings.</u></p> <p><u>Weyerhaeuser Raymond uses stencils and/or paint to mark lumber bundles, but the facility does not use manufacturing operations in §63.7985(b), or any manufacturing operations, to manufacture these marking materials. Therefore, Weyerhaeuser Raymond is not subject to 40 CFR 63 Subpart HHHHH.</u></p>	Not Applicable
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Comment [R9]: This is an assumption based on Ken's input.

Comment [R10]: Manufacturing operations:

- 63.7985(b)(1)
Process vessels.
- 63.7985(b)(2)
Storage tanks for feedstocks and products.
- 63.7985(b)(3)
Components such as pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, and instrumentation systems.
- 63.7985(b)(4)
Wastewater tanks and transfer racks.

Weyerhaeuser- please confirm you do not use these "manufacturing operations" to manufacture coatings.

5.3 Applicability of Compliance Assurance Monitoring (CAM)

Applicable

Under 40 CFR Part 64.2(a) a facility is subject to the CAM Rule if it contains at least one pollutant-specific emissions unit that is subject to an emissions limitation or standard, uses a control device to meet this limitation or standard, and has potential pre-control device emissions to be classified as a major source. Emission Unit #1 (EU1), the waste wood fired boiler, has the pre-control potential to be a major source of CO, NO_x, and PM₁₀ and is subject to emissions limits for all three pollutants. A control device is not used to meet the limit for CO or NO_x, so the CAM Rule does not apply to CO or NO_x emissions. However, EU1 uses an ESP for control of PM₁₀, therefore the CAM Rule does apply to PM₁₀.

6.0 Notices of Construction

Weyerhaeuser Raymond has received numerous Notice of Construction (NOC) approvals from ORCAA for various equipment installations and operational changes. Table 6.1 provides a summary of NOC approvals and conditions from all NOC Orders of Approval and the status of each condition in Weyerhaeuser's AOP.

Table 6.1 Summary of Air Regulatory History

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
NOC no number issued: 7/17/73	na	Unconditional approval for shake mill equipment.	No Longer Applies: Weyerhaeuser's shake mill is located off-site of the Raymond mill and is no longer owned by Weyerhaeuser.
NOC no number issued: 2/5/74	na	Unconditional approval of cyclone for separating cedar waste (unit ID# 4, 55' ht, 2000 acfm).	No Longer Applies: Weyerhaeuser's shake mill is located off-site of the Raymond mill and is no longer owned by Weyerhaeuser.
NOC no number issued: 2/5/74	na	Unconditional approval of cyclone for separating wood chip material (unit ID# 5, 55' ft, 1500 cfm)	No Longer Applies: Weyerhaeuser's shake mill is located off-site of the Raymond mill and is no longer owned by Weyerhaeuser.
NOC no number issued: 2/5/74	na	Unconditional approval of cyclone for separating cedar sawdust (cyclone #6, 45' ht, 2000 acfm)	No Longer Applies: Weyerhaeuser's shake mill is located off-site of the Raymond mill and is no longer owned by Weyerhaeuser.
NOC no number issued: 11/25/74	na	Unconditional approval of bark press and fluid bed unit to be added to boiler #1 (old fluidized be boiler).	No Longer Applies: Weyerhaeuser's fluidized bed boiler no longer exists. The fluidized bed boiler was replaced by the current Wellons hog fuel boiler in 1995.
NOC no number issued: 9/9/75	na	Unconditional approval of "low pressure" cyclone for separating dry shavings and sawdust (unit ID# 8, 63' ht, 1377 acfm).	No Longer Applies: This NOC was amended by subsequent NOC for cyclone #8 issued 9/9/75.
NOC no number issued: 9/9/75	na	Unconditional approval of "high pressure" cyclone for separating dry shavings and sawdust (cyclone #8, 50' ht, 1456 acfm)	in effect unconditional
NOC no number issued: 9/9/75	na	Unconditional approval of cyclone for separating dry shavings and sawdust (unit ID #7, 108' ht, 9480 acfm). Notes on NOC data sheet refer to unit as "Wellons Bin".	No Longer Applies: This NOC was amended by subsequent NOC for cyclone #7 issued 9/9/75.
NOC no number issued: 9/9/75	na	Unconditional approval of cyclone for separating dry shavings and sawdust (cyclone #7, 95' ht, 9480 acfm, Sutorbuilt model 22x60, 200 hp blower). Notes on NOC data sheet refer to unit as "Wellons Bin".	in effect unconditional

Table 6.1 Summary of Air Regulatory History

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
NOC #112 issued: 4/19/76	na	Unconditional approval for a cyclone for separating sawdust and shavings (Cyclone #11, 60' ht, 9500 acfm, Sutorbilt model 22x60, 200 hp blower).	in effect unconditional
NOC #152 issued: 10/27/76	na	Unconditional approval of boiler ID fan and air pre-heater bypass.	No Longer Applies: Weyerhaeuser's fluidized bed boiler was replaced by the current Wellons hog fuel boiler in 1995.
NOC #213 issued 12/30/77	na	Unconditional approval of cyclone for separating cedar and shingle mill waste (unit ID# ?, ht ?, 19,800 acfm)	Former location at shake and shingle mill now no longer owned by Weyerhaeuser.
NOC #263 issued sometime in 1978	na	Unconditional approval of wet scrubber for boiler #1.	No Longer Applies: Weyerhaeuser's fluidized bed boiler was replaced by the current Wellons hog fuel boiler in 1995.
NOC #270 4/30/79	na	Unconditional NOC approval of multiclone for fluidized bed boiler.	No Longer Applies: Weyerhaeuser's fluidized bed boiler was replaced by the current Wellons hog fuel boiler in 1995.
NOC #338 8/30/83	na	Unconditional approval of filing room for saw and planer knife sharpening.	in effect unconditional
NOC #483 10/12/92	na	Not Applicable: determination was that a NOC for the dry kiln replacements was not required as the replacement was "in-kind".	NOC application submitted, however final determination was that NOC approval was not required.
NOC #501 11/23/92	conditions	Conditional approval of new Dayton cyclone for cross-cut saw.	superseded by 98NOC009
NOC #553 issued: 2/14/93 amended: 5/18/95 amended: 12/3/99	conditions	Conditional approval of new dust collection system for planing mill. System includes: 1. planing mill BH #1 2. planing mill cyclone #5	in effect conditional
	#1	The planer mill dust collection system shall be in accordance with the equipment types and specifications as described in the associated NOC application.	Not an ongoing applicable requirement. The equipment was established and equipment specifications have been verified by ORCAA inspection.

Table 6.1 Summary of Air Regulatory History

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	#2	Specifies that ORCAA shall be notified prior to any alterations or modifications that would trigger requirements for a NOC.	This condition simply states the requirement that ORCAA be notified prior to any changes that would trigger new source review (NSR). The condition was added to the approval order for purposes of clarification. Since NSR requirements are already contained in WAC 173-400, and since these requirements are applicable when triggered, this condition is not considered as an applicable requirement for this permit.
	#3	Completion notice required.	Not an ongoing applicable requirement. The equipment was established and ORCAA was notified.
	#4	Contains specific O&M and monitoring requirements for the new planer mill baghouse: a) O&M plan b) monitor pressure drop c) gr/dscf limit d) 10% opacity limit	applicable requirement AOP conditions: 5.3d (grain loading limit) 5.3g (opacity limit) 5.3j (O&M plan requirement) 5.3i (O&M requirements)
	#5	Generally defines the layout of the new planer mill cyclone in the system and specifies that there shall be no fugitive leaks from the system.	applicable requirement AOP condition: 5.3i
	#6	Generally defines the layout of the new truck bin cyclone and specifies that there shall be no fugitive leaks from the system.	applicable requirement AOP condition: 5.3i
	#7	Generally defines the truck bin.	applicable requirement AOP condition: 5.3i
	#8	Requires Weyerhaeuser to develop and implement an O&M plan for purposes of maintaining the planing mill dust collection system.	applicable requirement AOP condition: 5.3j
	#9	Specifies certain records be maintained on-site and made available upon request.	applicable requirement AOP condition: 7.5
	#10	Requires that total annual product throughput and other process information necessary to calculate annual particulate emissions from the facility be reported to ORCAA on standard ORCAA forms.	applicable requirement AOP condition: 8.9

Table 6.1 Summary of Air Regulatory History

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	#11	This condition simply states the enforceability of the conditions of the order.	Redundant. This condition simply states the utility of regulatory approval orders.
NOC #554 issued: 2/14/93 amended: 5/18/95 amended: 12/3/99	conditions	Conditional approval of powerhouse baghouse system.	In effect conditional
	#1	The powerhouse baghouse system shall be in accordance with the equipment types and specifications as described in the associated NOC application.	Not an ongoing applicable requirement. The equipment was established and equipment specifications have been verified by ORCAA inspection.
	#2	Specifies that ORCAA shall be notified prior to any alterations or modifications that would trigger requirements for a NOC.	This condition simply states the requirement that ORCAA be notified prior to any changes that would trigger new source review (NSR). The condition was added to the approval order for purposes of clarification. Since NSR requirements are already contained in WAC 173-400, and since these requirements are applicable when triggered, this condition is not considered as an applicable requirement for this permit.
	#3	Completion notice required.	Not an ongoing applicable requirement. The equipment was established and ORCAA was notified.
	#4	Contains specific O&M and monitoring requirements for the new powerhouse: 1. O&M plan 2. monitor pressure drop 3. 0.01 gr/dscf limit 4. 10% opacity limit	applicable requirement AOP conditions: 5.5d (grain loading limit) 5.5g (opacity limit) 5.5i (O&M plan requirement) 5.5j (O&M requirements)
	#5	Requires Weyerhaeuser to develop and implement an O&M plan for purposes of maintaining the planing mill dust collection system.	applicable requirement AOP condition 5.5i
	#6	Specifies certain records be maintained on-site and made available upon request.	applicable requirement AOP condition 7.5
	#7	Requires that total annual product throughput and other process information necessary to calculate annual particulate emissions from the facility be reported to ORCAA on standard ORCAA forms.	applicable requirement AOP condition 8.9
	#8	This condition simply states the enforceability of the conditions of the order.	Redundant. This condition simply states the utility of regulatory approval orders.

Table 6.1 Summary of Air Regulatory History

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
NOC #570 issued 3/2/94 amended: 12/3/99	conditions	Conditional approval of dry kiln #3.	in effect unconditional
NOC #589 issued 12/13/95	na	This NOC approved a temporary diesel fired portable boiler that was brought on-site for a period of less than a year.	obsolete This boiler was intended as a temporary unit and is now gone.
NOC 97NOC025 issued 7/25/97 amended: 12/3/99	conditions	Conditional approval of 4 new lumber dry kilns (replacement kilns for #s 1-4).	in effect conditional
	#1	Completion notice required.	Not an ongoing applicable requirement. The equipment was established and ORCAA was notified.
NOC 98NOC009 issued 3/31/98 amended: 12/3/99	conditions	Conditional approval of a new baghouse dust collection system for the package saw (package saw baghouse).	in effect conditional
	#1	Requires the cyclone #19 be in accordance with the equipment types and specifications as described in the associated NOC application.	Not an ongoing applicable requirement. The equipment was established and equipment specifications have been verified by ORCAA inspection.
	#2	Specifies a 10% opacity limit for the new package saw baghouse.	Applicable Requirement AOP condition 5.3i
	#3	Completion notice required.	Not an ongoing applicable requirement. The equipment was established and ORCAA was notified.
NOC 98NOC004 issued 1/21/98 amended: 12/3/99	conditions	Conditional approval of a new sawmill dust collection system (sawmill baghouse).	in effect conditional
	#1	Requires the new sawmill dust collection system be in accordance with the equipment types and specifications as described in the associated NOC application.	Not an ongoing applicable requirement. The equipment was established and equipment specifications have been verified by ORCAA inspection.
	#2	Specifies an opacity limitation for the new sawmill baghouse.	applicable requirement AOP condition 6.4f
	#3	Completion notice required.	Not an ongoing applicable requirement. The equipment was established and ORCAA was notified.
NOC 96NOC031 Issued: 12/4/96 Amended: 12/3/99	conditions	Conditional approval of new planing mill baghouse (#2, "Carter Day") and cyclone #21.	in effect conditional
	#1	Completion notice required.	Not an ongoing applicable requirement. The equipment was established and ORCAA was notified.

Table 6.1 Summary of Air Regulatory History

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	#2	Requires the new planing mill baghouse and cyclone #13 be in accordance with the equipment types and specifications as described in the associated NOC application.	Not an ongoing applicable requirement. The equipment was established and equipment specifications have been verified by ORCAA inspection.
	#3	Establishes an opacity limitation for emissions from the new system.	applicable requirement AOP condition 5.3h
	#4	Prohibits visual leaks from the new system.	applicable requirement AOP condition 5.3i
	#5	Requires an O&M plan for the new system.	applicable requirement AOP conditions 5.3j & 5.3l
	#6	Specifies records to be maintained on site.	applicable requirement AOP condition 7.5
	NOC 95NOC646 95NOC647 combined Issued: 8/8/95 Amended: 12/3/99	Conditions	Conditional approval for: 1. Wellons boiler 2. dry kilns #5 & #6
#1		Completion notice required.	Not an ongoing applicable requirement. The equipment was established and ORCAA was notified.
#2		Requires the new boiler and dry kilns be in accordance with the equipment types and specifications as described in the associated NOC application.	Not an ongoing applicable requirement. The equipment was established and equipment specifications have been verified by ORCAA inspection.
#3		Boiler particulate limit.	applicable requirement AOP condition 5.1d
#4		Boiler opacity limit.	applicable requirement AOP condition 5.1g
#5		Boiler NOx limit.	applicable requirement AOP condition 5.1n
#6		Boiler CO limit	applicable requirement AOP condition 5.1o
#7		Specifies requirements for boiler stack sampling ports and platforms.	Not an ongoing applicable requirement. The equipment was established and equipment specifications have been verified by ORCAA inspection.
#8.1		The opacity CEMS shall be certified and installed in accordance with 40 CFR Part 60, Performance Specification #1 (appendix B).	Not an ongoing applicable requirement. The equipment was established and equipment specifications have been verified by ORCAA inspection.

Table 6.1 Summary of Air Regulatory History

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	#8.2	The opacity CEMS shall be equipped with a strip chart recorder or data acquisition system (DAS) capable of computing and recording stack gas opacity in three consecutive minute averages. The DAS or strip chart recorder shall record and display opacity values to 0.5% opacity.	applicable requirement AOP condition 5.1k
	#8.3	Prior to installation of the CEMS, the owner or operator shall provide ORCAA a written manufacturers certificate of conformance with Performance Specification 1.	Not an ongoing applicable requirement. The manufacturers certification of conformance has been verified by ORCAA inspection.
	#8.4	An opacity CEMS quality assurance plan conforming with 40 CFR Part 60, Appendix F and the EPA publication <u>Recommended Quality Assurance Procedures for Opacity Continuous Emissions Monitoring Systems</u> (EPA 340/1-86-010) shall be developed and implemented.	applicable requirement AOP condition 5.1k
	#8.5	The opacity CEMS shall be operational and tested for compliance with 40 CFR Part 60, Appendix B Performance Specification 1 no later than 90 days after initial startup. All results from certification testing pursuant to Performance Specification 1 shall be submitted to ORCAA as verification of compliance no later than 120 days after initial startup.	Not an ongoing applicable requirement. The certification testing has been completed and submitted to ORCAA for review.
	#9	Requires an O&M plan for the boiler and Identifies the minimum elements for the plan.	applicable requirement AOP condition 5.1q
	#9.4	Requires procedures for operating the fluidized bed boiler.	Obsolete. The fluidized bed boiler has since been removed.
	#10	Requires reporting of excess emissions and malfunctions.	applicable requirement AOP condition 5.11
	#11	Specifies required records to be maintained on site.	applicable requirement AOP condition 7.5
	#12	Specifies the type of hog fuel that can be burned in the boiler.	applicable requirement AOP condition 5.1p
	#13	This condition simply states the enforceability of the conditions of the order.	Redundant. This condition simply states the utility of regulatory approval orders.
NOC 94NOC589	Conditions	ESP Approval: Conditional approval to install an electrostatic precipitator.	This approval order was superceded by 95NOC646.
	#1	Completion notice required.	

Table 6.1 Summary of Air Regulatory History

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
Reissued: 5/18/95	#2	Requires the new ESP be in accordance with the equipment types and specifications as described in the associated NOC application.	
	#3	ESP particulate limit	
	#4	ESP opacity limit	
	#5	Specifies requirements for boiler stack sampling ports and platforms.	
	#6	Initial compliance testing.	
	#7	Requires an ESP O&M plan	
	#8	Specifies required records to be maintained on site.	
	#9	Excess emissions reporting requirements.	
	#10	This condition simply states the enforceability of the conditions of the order.	
	NOC 01NOC110 Issued: 2/2/2001	Revised Condition 12 of 95NOC646	
NOC 01NOC177 Issued: 8/7/2001	None	This NOC did not result in conditions of approval.	This NOC did not result in ongoing applicable requirements.
NOC 06NOC467 Issued: 4/6/2006	Conditions		
	1.	Requires the new equipment be in accordance with the equipment types and specifications as described in the associated NOC application.	Not an ongoing applicable requirement.
	2.	Visible emissions from the Powerhouse Baghouse shall not exceed 10% opacity for a period or periods aggregating more than 3 minutes in any 1 hour, as determined by the Washington Department of Ecology Method 9A.	Applicable Requirement
	3.	The owner or operator shall maintain written procedures in a compliance assurance plan that provides instructions for inspection, maintenance, and repair of the Powerhouse Baghouse. The compliance assurance plan shall contain, but not be limited to, the following: a) A schedule for inspecting the Powerhouse Baghouse; b) Procedures for inspecting the Powerhouse Baghouse; and, c) Standard log for recording inspections and repairs of the Powerhouse Baghouse.	Applicable Requirement

Table 6.1 Summary of Air Regulatory History

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	4.	The owner or operator shall monitor the differential pressure across the Powerhouse Baghouse on at least a weekly basis.	Applicable Requirement
	5.	Records required by this Approval Order shall include the date and name of the person making the entry. If the Powerhouse Baghouse is not operating or is malfunctioning during a specific time period, a record shall be made to that effect. The following data shall be recorded at the frequency indicated, maintained for a minimum period of at least five years, and made available for inspection by ORCAA upon request.	Applicable Requirement

7.0 Statement of Basis

The following table provides the regulatory basis for each permit condition.

Table 7.1 - Statement of Basis

Condition	Basis
2.1 Duty to comply.	Standard Term or Condition WAC 173-401-620(2)(a)
2.2 Duty to Provide Information.	Standard Term or Condition WAC 173-401-620(2)(e)
2.3 Need to Halt or Reduce Activity Not a Defense.	Standard Term or Condition WAC 173-401-620(2)(b)
2.4 Property Rights	Standard Term or Condition Authority: WAC 173-401-620(2)(d) Origin: WAC 173-401-620(2)(d)
2.5 Annual Fees	Standard Term or Condition Authority: WAC 173-401-620(2)(f) Origin: ORCAA 1.6.03
2.6 Severability	Standard Term or Condition Authority: WAC 173-620(2)(h) Origin: WAC 173-401-620(2)(h)
2.7 Federally Enforceable Requirements	Standard Term or Condition Authority: WAC 173-401-625 Origin: WAC 173-401-625
2.8 Permit Actions	Standard Term or Condition Authority: WAC 173-401-620(2)(c) Origin: WAC 173-401-620(2)(c)
2.9 Permit Appeals	Standard Term or Condition Authority: WAC 173-401-620(2)(i)
2.10 Permit Renewal and Expiration	Standard Term or Condition Authority: WAC 173-401-705, WAC 173-401-610 and 620(2)(j) Origin: WAC 173-401-705, WAC 173-401-610 and 620(2)(j)
2.11 Duty to Supplement or Correct Application	Standard Term or Condition Authority: WAC 173-401-500(6) Origin: WAC 173-401-500(6)
2.12 Reopening for Cause	Standard Term or Condition Authority: WAC 173-401-730 Origin: WAC 173-401-730
2.13 Changes Requiring Permit Revision/Off Permit Changes	Standard Term or Condition Authority: WAC 173-401-722; WAC 173-401-724 Origin: WAC 173-401-722; WAC 173-401-724
2.14 Permit Modifications	Standard Term or Condition Authority: WAC 173-401-720; WAC 173-401-725 Origin: WAC 173-401-720; WAC 173-401-725

Table 7.1 - Statement of Basis

Condition	Basis
2.15 Emission Trading	Standard Term or Condition Authority: WAC 173-401-620(2)(g) Origin: WAC 173-401-620(2)(g)
2.16 Compliance Maintenance	Standard Term or Condition Authority: WAC 173-401-630(3) Origin: WAC 173-401-630(3)
2.17 False or Misleading Statements	Standard Term or Condition Authority: WAC 173-401-520 Origin: ORCAA 7.2; WAC 173-400-105(7)
2.18 Inspection and Entry	Standard Term or Condition Authority: WAC 173-401-630(2) Origin: ORCAA 1.5(e)
2.19 Access for Inspection	Standard Term or Condition Authority: WAC 173-401-630(2) Origin: Local Only: ORCAA 1.3.015(e)
2.20 Source Testing	Standard Term or Condition Authority: WAC 173-401-630(1) Origin: WAC 173-400-105(4); ORCAA 1.3.01(j)
2.21 Credible Evidence	Standard Term or Condition Authority: WAC 173-401-630(1) Origin: 40 CFR 51.212; 40 CFR 52.12; 40 CFR 53.33; 40 CFR 60.11; 40 CFR 61.12
2.22 Emergency as Affirmative Defense	Standard Term or Condition Authority: WAC 173-401-645(2)&(5) Origin: WAC 173-401-645(2)&(5)
2.23 Unavoidable Excess Emissions Excused	Standard Term or Condition Authority: WAC 173-401-630(1) Origin: WAC 173-400-107; ORCAA 8.7
3.1 New Source Review	Actions Requiring Prior Approval Authority: WAC 173-401-600(1) Origin: WAC 173-400-110; ORCAA 6.1
3.2 Replacement or Substantial Alteration of Existing Control Equipment	Actions Requiring Prior Approval Authority: WAC 173-401-600(1) Origin: State/Local Only: WAC 173-400-114; ORCAA 6.1.10
3.3 Demolition and Asbestos Projects.	Actions Requiring Prior Approval Authority: WAC 173-401-600(1) Origin: Local Only: ORCAA 3.05
3.4 Demolition and Renovation Projects	Actions Requiring Prior Approval Authority: WAC 173-401-600(1) Origin: 40 CFR 61.145(b)

Table 7.1 - Statement of Basis

Condition	Basis
3.5 Temporary <u>Portable</u> Sources	Actions Requiring Prior Approval Authority: WAC 173-401-635 Origin: ORCAA 4.5
4.1 Demolition and Renovation Projects	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: 40 CFR 61.145(b); ORCAA 3.05
4.2 Stratospheric Ozone	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: 40 CFR 82, Subpart F
4.3 Emissions Detrimental to Persons or Property	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: WAC 173-400-040(56); ORCAA 8.3(e)
4.4 Fallout	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: WAC 173-400-040(23); ORCAA 8.3(e)(local only)
4.5 Odors (State)	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: WAC 173-400-040(45); ORCAA 8.5(a)(local only)
4.6 Odors (ORCAA)	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: ORCAA 8.5(c)(local only)
4.7 Fugitive Emissions Control	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: WAC 173-400-040(34)(a)
4.8 Fugitive Dust Control	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: WAC 173-400-040(89)(a); ORCAA 8.3(c)(local only)
4.9 Concealment and Masking	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: WAC 173-400-040(78); ORCAA 7.5(local only)
4.10 Maintenance and Repair of Air Pollution Control Equipment and Processes	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: ORCAA 8.8
4.11 General Standards for Maximum Visual Emissions	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: ORCAA 8.2(local only); WAC 173-400-040(12)
4.12 Sulfur Dioxide	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: WAC 173-400-040(67)

Table 7.1 - Statement of Basis

Condition	Basis
4.13 General Particulate Standards for Combustion Units	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: WAC 173-400-050(1); ORCAA 8.3(a)(local only)
4.14 General Emission Standards for Process Units	Facility-Wide & General Applicable Requirement Authority: WAC 173-400-060 Origin: ORCAA 8.3(a)
5.1a EU1 Sulfur Dioxide Limit.	Requirements Specific to EU1 Authority: WAC 173-401-600(1)(b) Origin: WAC 173-400-040(67)
5.1b EU1 Particulate Limit, WAC.	Requirements Specific to EU1 Authority: WAC 173-401-600(1)(b) Origin: WAC 173-400-050(1)
5.1c EU1 Particulate Limit, OAPCA Regulation 1	Requirements Specific to EU1 Authority: WAC 173-401-600(1)(b) Origin: ORCAA 8.3 (local only)
5.1d EU1 Particulate Limit, 95NOC646.	Requirements Specific to EU1 Authority: WAC 173-401-600(1)(b) Origin: 95NOC646, Condition #3
5.1e EU1 Opacity Limit, ORCAA Regulations	Requirements Specific to EU1 Authority: WAC 173-401-600(1)(b) Origin: ORCAA 8.2 (local only)
5.1f EU1 Opacity Limit, WAC	Requirements Specific to EU1 Authority: WAC 173-401-600(1)(b) Origin: WAC 173-400-040(12); WAC 173-400-070(2)(a)
5.1g EU1 Opacity Limit, 95NOC646	Requirements Specific to EU1 Authority: WAC 173-401-600(1)(b) Origin: 95NOC646, condition #4
5.1h EU1 Particulate Limit, Subpart Db	Requirements Specific to EU1 Authority: WAC 173-401-600(1)(a) Origin: 40CFR Part 60, Subpart Db including: §60.43b(c)(1) §60.43b(g) §60.46b(a) §60.46b(d)(1)-(6) §60.8
5.1i EU1 Opacity Limit, Subpart Db	Authority: WAC 173-401-600(1)(a) Origin: 40CFR Part 60, Subpart Db including: §60.43b(f); §60.11(c); §60.43b(g); §60.46b(a); §60.46b(d)(7); §60.11(e)(3) §60.8

Table 7.1 - Statement of Basis

Condition	Basis
5.1j EU1 Subpart Db Concealment Prohibition	Requirements Specific to EU1 Authority: WAC 173-401-600(1)(a) Origin: 40CFR part 60, Subpart Db and General Requirements including: §60.12
5.1k EU1 NOx Limit, 95NOC646	Requirements Specific to EU1 Authority: WAC 173-401-600(1)(b) Origin: 95NOC646, Condition #5
5.1l EU1 CO Limit, 95NOC646	Requirements Specific to EU1 Authority: WAC 173-401-600(1)(b) Origin: 95NOC646, Condition #6
5.1m EU1 Fuel Quality Requirement	Requirements Specific to EU1 Authority: WAC 173-401-600(1)(b) Origin: 95NOC646, Condition #12
5.1n EU1 O&M Plan	Requirements Specific to EU1 Authority: WAC 173-401-600(1)(b) Origin: 95NOC646, Condition #9
5.1o EU1 Requirement to Operate and Maintain Equipment Consistent with Good Air Pollution Control Practice for Minimizing Emissions, Subpart Db	Requirements Specific to EU1 Authority: WAC 173-401-600(1)(a) Origin: 40CFR part 60, Subpart Db including: §60.11(d)
5.1p EU1 Requirement to Adequately Operate and Maintain Pollution Control Equipment, OAPCA Regulation 1	Requirements Specific to EU1 Authority: WAC 173-401-600(1)(b) Origin: ORCAA 8.8 (local only)
5.1q EU1 Proper Maintenance of Monitoring System	Requirements Specific to EU1 Authority: WAC 173-401-600(1)(a) Origin: 40 CFR Part 64 (§64.7(b))
5.1r EU1 Response to Excursions or Exceedances	Requirements Specific to EU1 Authority: WAC 173-401-600(1)(a) Origin: 40 CFR Part 64 (§64.7(d))
5.2a EU2 Sulfur Dioxide Limit	Requirements Specific to EU2 Authority: WAC 173-401-600(1)(b) Origin: WAC 173-400-040(6)
5.2b EU2 Particulate Standard, ORCAA Regulations	Requirements Specific to EU2 Authority: WAC 173-401-600(1)(b) Origin: ORCAA 8.3 (local only)
5.2c EU2 Particulate Standard, State General Standard for Process Units	Requirements Specific to EU2 Authority: WAC 173-401-600(1)(b) Origin: ORCAA 8.3
5.2d EU2 Opacity Limit, ORCAA Regulations	Requirements Specific to EU2 Authority: WAC 173-401-600(1)(b) Origin: ORCAA 8.2 (local only)
5.2e EU2 Opacity Limit, State General Standards	Requirements Specific to EU2 Authority: WAC 173-401-600(1)(b) Origin: WAC 173-400-040(2)

Table 7.1 - Statement of Basis

Condition	Basis
5.2f EU2 ORCAA Regulations Requirement to Adequately Operate and Maintain Pollution Control Equipment.	Requirements Specific to EU2 Authority: WAC 173-401-600(1)(b) Origin: ORCAA 8.8 (local only)
5.2g EU2 National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products.	Requirements Specific to EU2 Authority: WAC 173-401-600(1)(b) Origin: 40 CFR Part 63 Subpart DDDD
5.3a EU3 Sulfur Dioxide Limit	Requirements Specific to EU3 Authority: WAC 173-401-600(1)(b) Origin: WAC 173-400-040(67)
5.3b EU3 Particulate Standard, ORCAA Regulations	Requirements Specific to EU3 Authority: WAC 173-401-600(1)(b) Origin: ORCAA 8.3 (local only)
5.3c EU3 Particulate Standard, State General Standards for Process Units	Requirements Specific to EU3 Authority: WAC 173-401-600(1)(b) Origin: WAC 173-400-060
5.3d EU3 (Clark baghouse only), Particulate Limit 94NOC553	Requirements Specific to EU3 Authority: WAC 173-401-600(1)(b) Origin: 94NOC553, Condition 4c
5.3e EU3 Opacity Limit, ORCAA Regulations	Requirements Specific to EU3 Authority: WAC 173-401-600(1)(b) Origin: ORCAA 8.2 (local only)
5.3f EU3 Opacity Limit, State General Standard	Requirements Specific to EU3 Authority: WAC 173-401-600(1)(b) Origin: WAC 173-400-040(42)
5.3g EU3 (Clark baghouse only), 94NOC553	Requirements Specific to EU3 Authority: WAC 173-401-600(1)(b) Origin: 94NOC031, Condition 3
5.3h EU3 (Carter Day baghouse only), 96NOC031	Requirements Specific to EU3 Authority: WAC 173-401-600(1)(b) Origin: 96NOC031, Condition #2
5.3i EU3 (Package Saw only), 98NOC009	Requirements Specific to EU3 Authority: WAC 173-401-600(1)(b) Origin: 98NOC009, Condition #2
5.3j EU3 Requirement to Implement an Operation and Maintenance Plan, 94NOC 553, 96NOC031	Requirements Specific to EU3 Authority: WAC 173-401-600(1)(b) Origin: 94NOC553, Condition #8 96NOC031, Condition #5
5.3k EU3 Requirement to Adequately Operate and Maintain Pollution Control Equipment, ORCAA Regulations	Requirements Specific to EU3 Authority: WAC 173-401-600(1)(b) Origin: ORCAA 8.8
5.4a EU4 Sulfur Dioxide Limit	Requirements Specific to EU4 Authority: WAC 173-401-600(1)(b) Origin: WAC 173-400-040(76)

Table 7.1 - Statement of Basis

Condition	Basis
5.4b EU4 Particulate Limit, ORCAA Regulations	Requirements Specific to EU4 ORCAA 8.3(a) Authority: WAC 173-401-600(1)(b)
5.4c EU4 General Emission Standards for Process Units	Requirements Specific to EU4 Authority: WAC 173-401-600(1)(b) Origin: WAC 173-400-060
5.4d EU4 Opacity Limit, ORCAA Regulations	Requirements Specific to EU4 Authority: WAC 173-401-600(1)(b) Origin: ORCAA 8.2 (local only)
5.4e EU4 Opacity Limit, State General Standard	Requirements Specific to EU4 Authority: WAC 173-401-600(1)(b) Origin: WAC 173-400-040(2±)
5.4f EU4 (sawmill baghouse only), Opacity Limit, 98NOC004	Requirements Specific to EU4 Authority: WAC 173-401-600(1)(b) Origin: 98NOC004, Condition #2
5.4g EU4 Requirement to Adequately Operate and Maintain Pollution Control Equipment, ORCAA Regulations	Requirements Specific to EU4 Authority: WAC 173-401-600(1)(b) Origin: ORCAA 8.8 (local only)
5.5a EU5 Sulfur Dioxide Limit	Requirements Specific to EU5 Authority: WAC 173-401-600(1)(b) Origin: WAC 173-400-040(7 6)
5.5b EU5 Particulate Limit, ORCAA Regulations	Requirements Specific to EU4 Authority: WAC 173-401-600(1)(b) Origin: ORCAA 8.3(a)
5.5c EU5 Particulate Limit, State General standard	Requirements Specific to EU4 Authority: WAC 173-401-600(1)(b) Origin: WAC 173-400-060
5.5d EU5 (Powerhouse baghouse only) Particulate Limit	Requirements Specific to EU4 Authority: WAC 173-401-600(1)(b) Origin: 95NOC554, Condition 4.c
5.5e EU5 Opacity Limit, ORCAA Regulations	Requirements Specific to EU4 Authority: WAC 173-401-600(1)(b) Origin: ORCAA 8.2 (local only)
5.5f EU5 Opacity Limit, State General Standard	Requirements Specific to EU4 Authority: WAC 173-401-600(1)(b) Origin: WAC 173-400-040(2±)
5.5g EU5 (Powerhouse baghouse only) Opacity Limit, 95NOC554	Requirements Specific to EU4 Authority: WAC 173-401-600(1)(b) Origin: 95NOC554, Condition 4.c
5.5h EU5 Requirement to Adequately Operate and Maintain Pollution Control Equipment, ORCAA Regulations	Requirements Specific to EU4 Authority: WAC 173-401-600(1)(b) Origin: ORCAA 8.8
5.5i EU5 Requirement to Implement and Operation and Maintenance Plan	Requirements Specific to EU4 Authority: WAC 173-401-600(1)(b) Origin: 95NOC554, Condition 5

Table 7.1 - Statement of Basis

Condition	Basis
6.1 Opacity Surveys	Compliance Monitoring Conditions Authority: WAC 173-401-615(1)(b) Origin: WAC 173-401-615(1)(b)
6.2 Certified Opacity Reading Required	Compliance Monitoring Conditions Authority: WAC 173-401-615(1)(b) Origin: WAC 173-401-615(1)(b)
6.3 Certified Opacity Reading Procedures	Compliance Monitoring Conditions Authority: WAC 173-401-615(1)(b) Origin: WAC 173-401-615(1)(b)
6.4 Monitoring Air Impacts Which are Detrimental or a Nuisance to Persons or Property	Compliance Monitoring Conditions Authority: WAC 173-401-615(1)(b) Origin: WAC 173-401-615(1)(b)
6.5 Fugitive Emissions and Dust Control Monitoring	Compliance Monitoring Conditions Authority: WAC 173-401-615(1)(b) Origin: WAC 173-401-615(1)(b)
6.6 Sulfur Dioxide Emissions Monitoring	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) Origin: WAC 173-401-615(1)(b)
6.7 Pollution Control Equipment Monitoring	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) Origin: WAC 173-401-615(1)(b)
6.8 Particulate Testing Required	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) Origin: WAC 173-400-105(4); Local Only: ORCAA 1.5(j)
6.9 EU1, CO Monitoring	Compliance Monitoring Conditions Authority: WAC 173-401-615(1)(b) Origin: 95NOC646 Condition 6
6.10 EU1, NO _x Monitoring	Compliance Monitoring Conditions Authority: WAC 173-401-615(1)(b) Origin: 95NOC646 Condition 5
6.11 Source Testing Procedures	Compliance Monitoring Conditions Authority: WAC 173-401-615(1)(a) Origin: ORCAA 1.5(c)
6.12 Soot Blowing/Grate Cleaning	Compliance Monitoring Conditions Authority: WAC 173-401-615(1)(a) Origin: ORCAA 8.2(c)
6.13 Wellons Hog Fuel Boiler Compliance Assurance Monitoring	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) Origin: 40 CFR Part 64
6.14 EU1 Continuous Opacity Monitoring	Compliance Monitoring Conditions Authority: WAC 173-401-615(1)(a) Origin: 95NOC647 Condition 8, §60.48b(a); §60.48b(e); §60.13

Table 7.1 - Statement of Basis

Condition	Basis
7.1 Retention and Availability of Records.	Recordkeeping Authority: WAC 173-401-615(2)(c) Origin: ORCAA 8.11
7.2 Record of Changes.	Recordkeeping Authority: WAC 173-401-615(2)(b) Origin: WAC 173-401-615(2)(b); WAC 173-401-724(5)
7.3 Monitoring Records.	Recordkeeping Authority: WAC 173-401-615(2)(a) Origin: WAC 173-401-615(2)(a)
7.4 Record of Permit Deviations.	Recordkeeping Authority: WAC 173-401-615(3)(b) Origin: WAC 173-401-615(3)(b)
7.5 Display of Orders, Certificates and Other Notices	Recordkeeping Authority: WAC 173-401-615(3)(b) Origin: Local Only : ORCAA 7.4
7.6 Availability of Emissions Records	Recordkeeping Authority: WAC 173-401-620(2)(e) Origin: Local Only : ORCAA 8.11
7.7 Emissions Records	Recordkeeping Authority: WAC 173-401-620(2)(e) Origin: WAC 173-400-105(1); ORCAA 8.11
7.8 Unlawful Reproduction or Alteration of Documents.	Recordkeeping Authority: WAC 173-401-630(1) Origin: Local Only : ORCAA 7.3
7.9 Record of Complaints.	Recordkeeping Authority: WAC 173-401-615(1)(b)&(2) Origin: ORCAA 1.5(d)
7.10 Record of Actions Taken	Recordkeeping Authority: WAC 173-401-615(2)(a) Origin: ORCAA 1.5(d)
7.11 Paperless Records	Recordkeeping Authority: WAC 173-401-630(1) Origin: 40 CFR 64.9(b)(2)
7.12 MACT Applicability Records	Recordkeeping Authority: WAC 173-401-615(2)(a) Origin: 40 CFR 63.1(b)(3); 40 CFR 63.10(b)(3)
7.13 Copies of Required Operations and Maintenance Plans	Recordkeeping Authority: WAC 173-401-600(1) Origin: ORCAA 8.11

Table 7.1 - Statement of Basis

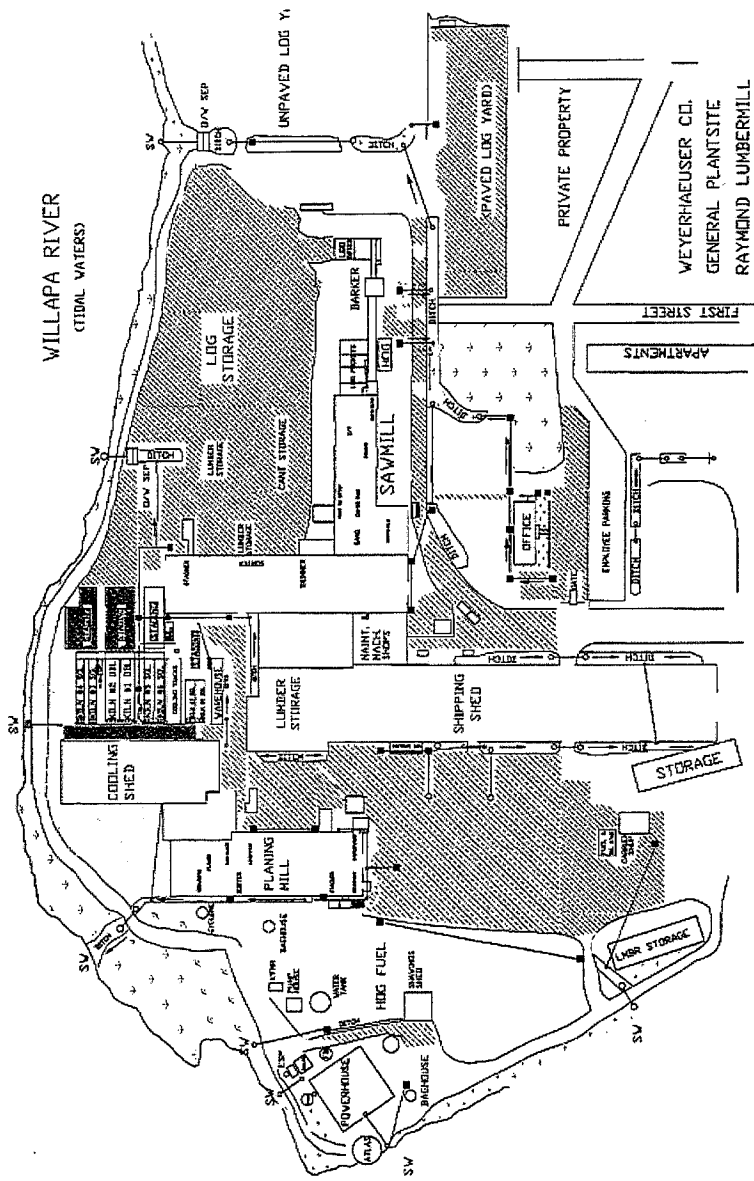
Condition	Basis
8.1 Certification of Reports.	Reporting Authority: WAC 173-401-630(1) Origin: WAC 173-410-630(1)
8.2 Annual Compliance Certification.	Reporting Authority: WAC 173-401-630(5) Origin: WAC 173-401-630(5)
8.3 Confidential Information	Reporting Authority: WAC 173-401-630(1) Origin: Local Only : ORCAA 1.6
8.4 Semi-annual Monitoring Reports.	Reporting Authority: WAC 173-401-615(3)(a) Origin: WAC 173-401-615(3)(a)
8.5 Reporting Deviations From Permit Conditions.	Reporting Authority: WAC 173-401-615(3)(b) Origin: WAC 173-401-615(3)(b); WAC 173-400-107(3); WAC 173-401-645
8.6 Notification of Control Equipment Malfunction	Reporting Authority: WAC 173-401-615(3) Origin: WAC 173-401-615(3); WAC 173-401-645
8.7 Notification of Need for Improved Monitoring of Emissions Units Subject to CAM	Reporting Authority: WAC 173-401-630(1) Origin: 40 CFR 64.7(e)
8.8 Notification of Complaint Received	Reporting Authority: WAC 173-401-615(3) Origin: ORCAA 8.7
8.9 Annual Inventory Report.	Reporting Authority: WAC 173-401-630(1) Origin: WAC 173-400-105(1), ORCAA 8.11
8.10 Source Test Plans.	Reporting Authority: WAC 173-401-630(1) Origin: ORCAA 1.5(f)
8.11 Source Test Reports.	Reporting Authority: WAC 173-401-630(1) Origin: ORCAA 1.5(f)
8.12 Notification of Need for Improved Monitoring of Emission Units Subject to CAM	Reporting Authority: WAC 173-401-630(1) Origin: 40 CFR Part64 64.7(e)
9.1 Permit Shield.	Permit Shield Authority: WAC 173-401-640(1) Origin: WAC 173-401-640(1)

Table 7.1 - Statement of Basis

Condition	Basis
9.2 Inapplicable or Exempt Requirements.	Permit Shield Authority: WAC 173-401-640(2) Origin: WAC 173-401-640(2)
9.3 Exclusions	Permit Shield Authority: WAC 173-401-640(4) Origin: WAC 173-401-640(4)

ATTACHMENT 1:
FIGURES

Figure A1.1 – General Site Plan for the Weyerhaeuser Raymond Lumbermill



APPENDIX C: POTENTIAL TO EMIT CALCULATIONS

Table 1. GHG Potential to Emit - Wellons Hog Fuel Boiler (EU1)

Capacity	Operation	Pollutant	Emission Factor ^a	PTE
115 MMBtu/hr	8760 hrs/yr	CO ₂	206.8 lb/MMBtu	104,162 tpy 94,494 metric tons/yr
		CH ₄	7.05E-02 lb/MMBtu	36 tpy 32 metric tons/yr
		N ₂ O	9.26E-03 lb/MMBtu	5 tpy 4 metric tons/yr
		CO ₂ e ^b		106,354 tpy 96,483 metric tons/yr
		CO ₂ e, federal ^c		2,192 tpy 1,989 metric tons/yr

a. Table C-1 and C-2 to Subpart C of Part 98 (12/17/2010). The emission factors for wood and wood residuals are used.

b. Total includes biogenic CO₂.

c. Biogenic CO₂ (i.e., CO₂ from wood combustion) is deferred, but CH₄ and N₂O are counted.

APPENDIX D: ORCAA TITLE V PERMIT RENEWAL APPLICATION FORMS

12AOP915



ORCAA AOP RENEWAL APPLICATION General Instructions and Checklist

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

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

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

ORCAA
2940 Limited Lane NW Suite B
Olympia, WA 98502

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

Your AOP Renewal Application should include the following¹:

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

The following, if identified in Form C:

- CAM Plan
CAM is triggered for PM10 for EU1 (Wellons Hog Fuel Boiler)

The following, if identified in Form D:

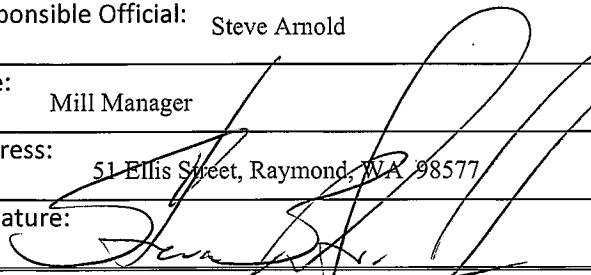
- Form E: NOC Approval Orders
- Form F: Off-Permit/502(b)(10) Changes
- Form G: NOC Not Required
- Form H: New Requirements
- Form I: Requested Changes
- Compliance plan

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

OLYMPIC REGION CLEAN AIR AGENCY

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

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

Company Name: Weyerhaeuser Company		For ORCAA use only	
Plant Name: Weyerhaeuser Raymond		File No: 475	County No: 49
Physical Address: 51 Ellis St. Raymond, WA 98577		Source No: 4	Application No: 12AOP915
Mailing Address (if different from above):		Date Received: RECEIVED AUG 01 2012 ORCAA	
Current AOP Number: 04AOP387			
Issuance Date: February 4, 2008		Expiration Date: February 4, 2013	
Do you request confidentiality for any of the records or information contained in this application? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, provide a separate copy of the application void of the materials considered confidential. Each page considered confidential must be individually identified by stamping "confidential" or similar method. Confidentiality can be claimed for information unique to the applicant and/or likely to adversely affect the competitive position of the applicant if released to the public or a competitor.			
Owner's name and agent: NRAI Corporate Services			
Plant site manager/contact: Nancy Wood Siglin			
Title: Environmental Coordinator	Phone: 360-942-6305	Email: Nancy.Wood-Siglin2@weyerhaeuser.com	
RESPONSIBLE OFFICIAL CERTIFICATION I certify that I am the responsible official, as defined in WAC 173-401-200(27) for this facility. I further certify as required by WAC 173-401-520, that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.			
Responsible Official: Steve Arnold			
Title: Mill Manager	Phone: 360-942-6301	Email: steven.arnold@weyerhaeuser.com	
Address: 51 Ellis Street, Raymond, WA 98577			
Signature: 		Date: July 27, 2012	

OLYMPIC REGION CLEAN AIR AGENCY

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

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

Facility Changes

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

New Applicable Requirements

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

Current Compliance

		If no...
Is the source in compliance with all of the conditions of the current permit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No See the annual compliance certification from 2011.	Attach a compliance plan.

Form D: Applicability Determinations, Page 2

Requested Changes

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

Other Changes/Corrections

Are there any...		If yes...
Changes to the Process Descriptions in the current Technical Support Document?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Please attach details or marked up copy of current permit.
Changes to the Emission Unit Summary in the current Technical Support Document?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Changes to the Regulatory Determinations in the current Technical Support Document?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Changes to the Insignificant Emission Units listed in the current Technical Support Document?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Changes to the current Statement of Basis in the current Technical Support Document?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

OLYMPIC REGION CLEAN AIR AGENCY

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

**AIR OPERATING PERMIT (AOP) RENEWAL APPLICATION
Form H: New Requirements**

For each new requirement that might apply to your facility, list the requirement, the emission unit it might apply to, and the applicability determination.

New Requirement	Emission Unit	Applies?	Reason	For inapplicable requirements, request permit shield?	Monitoring?
40 CFR 63 Subpart DDDDD (Boiler MACT)	EU1	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	EU1 is an affected source under Subpart DDDD.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	EPA has not released the revised rules to Subpart DDDDD. Weyerhaeuser will comply with all applicable regulations when EPA promulgates the new rules to Subpart DDDDD.
WAC 173-400-108 - Excess emissions reporting; WAC 173-400-109 - Unavoidable excess	Facility-wide	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	EPA has not approved the new regulations for excess emissions reporting in WAC 173-400-108 and 173-400-109	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
WAC 173-441 Reporting of emissions of greenhouse gases	EU1	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Facility-wide emissions of CO2e exceed 10,000 metric tons.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Per WAC 173-441-050(6)(e), owners or operators required to report under 173-441-030(1) must keep a written GHG monitoring plan.
		<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input type="checkbox"/> No	

OLYMPIC REGION CLEAN AIR AGENCY

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

AIR OPERATING PERMIT (AOP) RENEWAL APPLICATION
Form I: Requested Changes

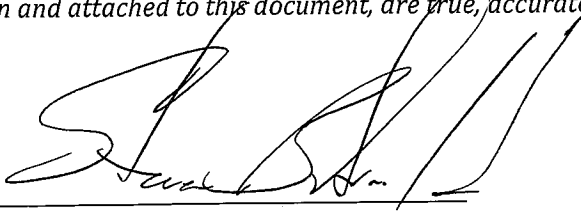
For each condition for which you would like to request a change to your current permit, please list the permit condition, requested change, and the reason for the change in the table below.

Condition #	Requested Change	Reason
	Requested changes to the current Title V air operating permit are listed in Section 8 of the Title V renewal application included with this form.	

APPENDIX E: CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS

Certification of Truth, Accuracy, and Completeness

Based on the information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document, are true, accurate, and complete.



Signature of Responsible Official

July 27, 2012

Date

STEVEN ARNOLD

Printed Name

UNIT MANAGER

Title