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Draft Technical Support Document

For Air Operating Permit # 22AOP1559

Simpson Door Company

AOP – Renewal
22AOP1559
DRAFT
<date issued>

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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 Air Operating Permit (AOP) for Simpson Door Company (Simpson Door), permit # 22AOP1559, which was issued by Olympic Region Clean Air Agency (ORCAA) on <Date Final>.

2.0 Permit Administration

2.1 General

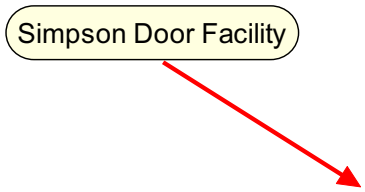
Simpson Door Company (Simpson Door) is a wood door manufacturing facility located in McCleary, Washington in Grays Harbor County. The facility emits both criteria and hazardous air pollutants (HAPs) but is major for only particulate matter. The facility manufactures wood doors and has been in existence since the early 1940s. It is approximately 42 acres in size containing vacant areas, storage, manufacturing facilities, steam generation, and an administrative office. Originally the facility manufactured both plywood and doors. However, in 1985, plywood operations and equipment were moved to another site. There have been no significant expansions or additions of equipment to the facility since the early 1940's when a wood fired boiler was added except a surface coating line to apply primers. However, Simpson Door ceased operation of the wood fired boiler (EU1) and now relies exclusively on their packaged boiler (EU3) for steam and heat. At the same time, the packaged boiler was converted to burn only natural gas and propane.

Table 1: Administrative Information and Contact Information

Company Name	Simpson Door Company
Facility/Source Name	Simpson Door Company
AOP Permit No.	22AOP1559
Mailing Address	Simpson Door Company 400 Simpson Avenue McCleary, WA 98557
Site Address	Same as mailing address
Facility/Plant/Environmental Manager	Kert Brown Maintenance Planner/ Responsible Official
Responsible Official	Phil Steklenski President/ Responsible Official
Unified Business Identification #	601-912-766
NAICS	321911
Standard Industrial Classification (SIC) Code	2431
Attainment Area Status	Attainment/Unclassified
Permitting Authority	Olympic Region Clean Air Agency
Permit Engineer	Mark V. Goodin – ORCAA Engineering Manager (360) 539-7610 ext. 108

Assigned Member of Compliance	Rob Wyland – Air Quality Specialist II (360) 539-7610 ext. 119

Figure 1: Simpson Door Location



Imagery ©2018 Google, Map data ©2018 Google

Figure 2: Simpson Door Residuals Handling Systems

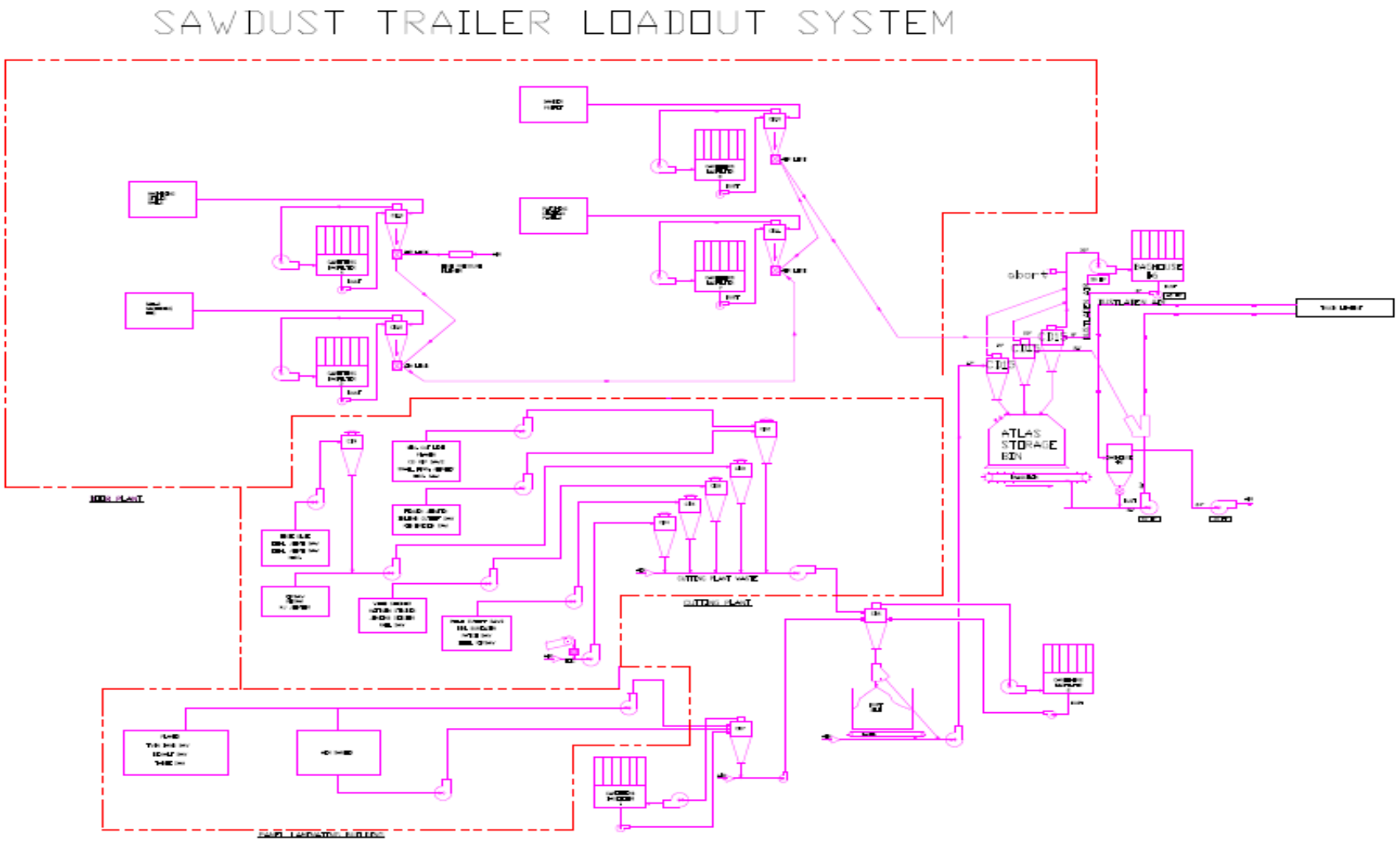


Diagram provided by Simpson Door Company

2.2 Permittee

The term "Permittee" refers to both the owner and operator of the facility. Both the owner and the operator are responsible for assuring compliance with the terms and conditions in the AOP. The current operator of the Simpson Door Company is identified as the Simpson Door Company (Simpson Door). The AOP and its requirements apply to operations at the Simpson Door Facility regardless of ownership changes. Therefore, a change in ownership transfers responsibility for complying with the AOP immediately to the new owner and operator.

2.3 Responsible Official

AOP regulations under Chapter 173-401 WAC require a "Responsible Official" certify the truth and accuracy of all compliance related submittals and reports required by the AOP based on their belief formed after reasonable inquiry.

AOP compliance-related submittals covers practically every report, submittal and certification required by the AOP such as deviation reports, malfunction reports, periodic monitoring reports, test reports, quarterly reports and annual compliance certifications. The AOP for the Simpson Door facility allows "batch-wise" certification of routine compliance reports under condition G5, which states, "Provided, however, where a report is sent more frequently than once every six months, the responsible official's certification needs only be submitted once every six months, covering all required reporting since the date of the last certification." This provision allows the Responsible Official may certify retroactively all reports submitted since the last certification.

According to WAC 173-401-200(29), the "Responsible Official" means one of the following:

a) For a corporation: A president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
    i. The facilities employ more than two hundred fifty persons or have gross annual sales or expenditures exceeding forty-three million in 1992 dollars; or
    ii. The delegation of authority to such representative is approved in advance by the permitting authority;

b) For a partnership or sole proprietorship: A general partner or the proprietor, respectively;

c) For a municipality, state, federal, or other public agency: Either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a federal agency includes the chief executive officer having responsibility

for the overall operations of a principal geographic unit of the agency (e.g., a regional administrator of EPA); or

d) For affected sources:
    i. The designated representative in so far as actions, standards, requirements, or prohibitions under Title IV of the FCAA or the regulations promulgated thereunder and in effect on April 7, 1993 are concerned; and
    ii. The designated representative for any other purposes under 40 CFR Part 70.

The designated Responsible Official for the Simpson Door Facility is identified as the president for the facility. This designation meets the requirements for Responsible Officials found in WAC 173-401-200(29).

2.4 Origins and Authorities for AOP Conditions

Per the Washington Air Operating Permit Program under WAC 173-401-600, the regulatory origin and authority for each condition must be stated in an AOP. For Simpson Door's AOP, the origin and authority are stated at the end of each permit condition. The "Origin" cites the local, state, federal regulation or New Source Review permit where the applicable requirement came from. The "Authority" cites the specific section in Chapter 173-401 WAC providing authority to include the requirement in the AOP. Table 2 below lists the specific authorities used by ORCAA for AOPs.

Table 2: Legal Authorities for AOP Conditions

Category of AOP Condition	Origin	Authority
Federal Emissions Limits and Standards	cite the NOC condition or performance standard	WAC 173-401-600(1)(a)
State Emissions Limits and Standards		WAC 173-401-600(1)(b)
NSR Permit Conditions		WAC 173-401-600(1)(c)
Applicable Monitoring *When monitoring is required by an applicable requirement*	cite the NOC condition or performance standard	WAC 173-401-615(1)(a)
Gap-filling Monitoring *When monitoring is not specified by an applicable requirement*	"N/A – gap-filling", Cite federal PS or QA procedure if you use as a surrogate	WAC 173-401-615(1)(b)
Additional Monitoring Equipment Requirements *When required monitoring references a federal performance specification and QA procedure*	Add the underlying section that requires the PS or QA procedure such as 40 CFR § 60.13(a)	WAC 173-401-615(1)(c)
Sufficiency Monitoring *When monitoring is required by an applicable requirement, but it is not sufficient to assure compliance*	"Provisions added to augment" cite the NOC condition or performance standard requiring the monitoring	WAC 173-401-630(1)

Recordkeeping (including gap-filling)	NOC condition or state, federal or local regulation requiring the record is cited	WAC 173-401-615(2)
All Reporting	NOC condition or state, federal or local regulation requiring the reporting is cited	WAC 173-401-615(3)

2.5 AOP Enforcement

Terms and conditions in the AOP are enforceable by ORCAA, Washington State, and, except for state or local only designated requirements, the U.S. EPA. Each condition in the AOP cites both the regulatory origin and authority of the condition. Any disputes regarding the exact language of an applicable requirement listed in the AOP should be settled by consulting the regulations cited as the regulatory origins for the condition.

2.6 Annual Fees

ORCAA calculates annual fees for Title V sources (AOP fees) using a formula that includes a facility fee, a fee based on the number of emission units, and a fee based on the actual amount of annual emissions in tons for the previous calendar year. The intent of this formula is to base annual Title V fees assessed each facility to its complexity and ORCAA's cost to administer the Title V program. The formula used to calculate AOP fees is found in ORCAA Rule 3.2.

2.7 Permit Renewals

The 16AOP1172 permit renewal for the Simpson Door Facility was issued with a fixed term of five years. This 22AOP1559 permit renewal will extend the permit five (5) years. Reopening for cause does not extend the term. Unless the Permittee submits a complete permit renewal application no later than six months before the expiration date, the AOP will expire. If a complete application is received in a timely manner, the AOP will remain in effect until a renewal AOP is issued. The same procedural requirements that apply to issuing an initial AOP apply to permit renewals, including public participation and affected state and EPA review. If ORCAA denies an AOP renewal application, the procedures for permit revocation apply. A final determination to deny an AOP renewal application can be contested by filing an appeal with the Pollution Control Hearings Board and serving a copy upon ORCAA within 30 days of receipt of the notice of the final determination to deny.

2.8 Permit Revocation

ORCAA may revoke the AOP only upon request of the permittee or for cause. For all revocations, ORCAA is required to provide at least thirty days written notice to the holder of the AOP prior to taking final action to revoke the permit or deny a permit renewal application. Such notice shall include an explanation of the basis for the proposed action and afford the

permittee/applicant an opportunity to meet prior to ORCAA's final decision. ORCAA may issue conditional revocations with a future effective date. A preliminary determination to revoke an AOP can be contested by filing an appeal with the Pollution Control Hearings Board and serving a copy upon ORCAA within 30 days of receiving notice of the intended action.

2.9 Reopening for Cause

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

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

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

2.10 Administrative Permit Amendments

An administrative permit amendment is a permit revision to the AOP that:

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

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

2.11 Changes not Requiring Permit Revisions

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

1. The proposed changes are not Title 1 modifications;
2. The proposed changes do not result in an increase in emissions, either a rate or a total, beyond what is allowed by the permit;

3. The proposed changes do not alter permit terms required to enforce limitation on emissions from emission units covered by the permit; and,
4. The permittee provides ORCAA and EPA written notification of the proposed changes at least 7 days prior to making the changes, unless an emergency requires swifter action.

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

2.12 Minor Permit Modifications

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

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

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

Requests for minor permit modifications must be made on official forms supplied by ORCAA and certified by a responsible official. Once ORCAA declares the application complete, it is ORCAA's responsibility to notify the EPA administrator and affected states and post notice on the Permit Register, which initiates a 21-day comment period. Within 90 days of receiving an application for a minor permit modification or within 15 days after the end of EPA's 45-day review period, whichever comes last, ORCAA shall either:

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

The Permittee may make the proposed changes immediately upon requesting the modification (unless a NOC is required). However, the Permittee must continue to comply with the applicable requirements governing the change and the proposed terms and conditions. During this time period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the source fails to comply with its proposed permit terms and

conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it.

2.13 Major Permit Modifications

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

3. Basis for Title V Applicability

Title V Air Operating Permits apply to "Major Sources" based on their Potential to Emit (PTE) regulated air pollutants. PTE is defined as the maximum possible emissions given physical and regulatory limitations. Table 3.1 below shows PTE estimates for the Simpson Door Facility based on current emissions limits and equipment design parameters. Any facility with a PTE at or above the "major source" threshold for any regulated pollutant is required to operate under an AOP issued through an approved Washington State AOP program, according to Title V of the federal Clean Air Act. The Simpson Door Facility is a major source of the pollutants PM_{10} and $PM_{2.5}$. Data presented below in Table 3.1 reflects Simpson Door's maximum controlled potential to emit (PTE) as reported in their AOP renewal application

TABLE 3.1: POTENTIAL TO EMIT (PTE)

Pollutant	PTE (tons)
PM (Total Particulate)	115.5 (525.2)
PM-10 (Total Particulate) (≤ 10µm)	99.1 (522.6)
PM 2.5 (Fine Particulate (≤ 2.5µm)	60.8 (520.0)
Oxides of Nitrogen (NO_x)	9.7
Sulfur Dioxide (SO_2)	1.0
Carbon Monoxide (CO)	6.1
Volatile Organic Compounds (VOC)	18.2
Total Hazardous Air Pollutants (HAPs)	5.9
Greenhouse Gases GHG[2]	8134

[1]PTE estimates reported in Simpson Door's 2022 AOP renewal application Emergency engine use was calculated for non-emergency use (100 hours per year for each engine for maintenance and testing per 40 CFR **§** 63.6640(f) and as permitted under Condition 5.2c) associated with emergency engines (EU6 and EU7).

[2] GHGs are in metric tons CO_{2e}.

[3]PTE assumes baghouse control for cyclones. Title V applicability PTE assuming uncontrolled cyclone emissions shown in parenthesis and discussed in Section 4.8 below.

Data presented in Table 3.2 below is from ORCAA's Annual Emission Inventory. ORCAA's annual

emissions inventory is compiled by ORCAA staff based on actual operating data provided by each regulated source. Annual actual emissions will vary from year to year based on operational conditions at the facility. The actual emissions reflect the actual materials used and production quantities that occurred during 2021.

TABLE 3.2: 2021 ACTUAL EMISSIONS

Pollutant	2021 Actual Emissions (tons)[1]	2021 Actual Emissions (pounds)[1]	Source of Data
Particulate Matter (PM)	59		ORCAA Inventory
Particulate Matter (PM_{10}) - particulate matter with an aerodynamic diameter less than 10 micrometers.	50		
Fine Particulate Matter ($PM_{2.5}$) - particulate matter with an aerodynamic diameter less than 2.5 micrometers.	30		
Oxides of Nitrogen (NO_x)	0.6		
Sulfur Dioxide (SO_2)	0.1		
Carbon Monoxide (CO)	0.3		
Volatile Organic Compounds (VOC)	2.0		
Acetaldehyde		0.0	
Acrolein		0.0	
Formaldehyde		20	
Glycol Ethers		3459	
Methanol		0	
Methylene diphenyl diisocyanate (MDI)		1	
Propionaldehyde		0	
Vinyl Acetate		346	
Total Hazardous Air Pollutants (HAPs)	1.91		

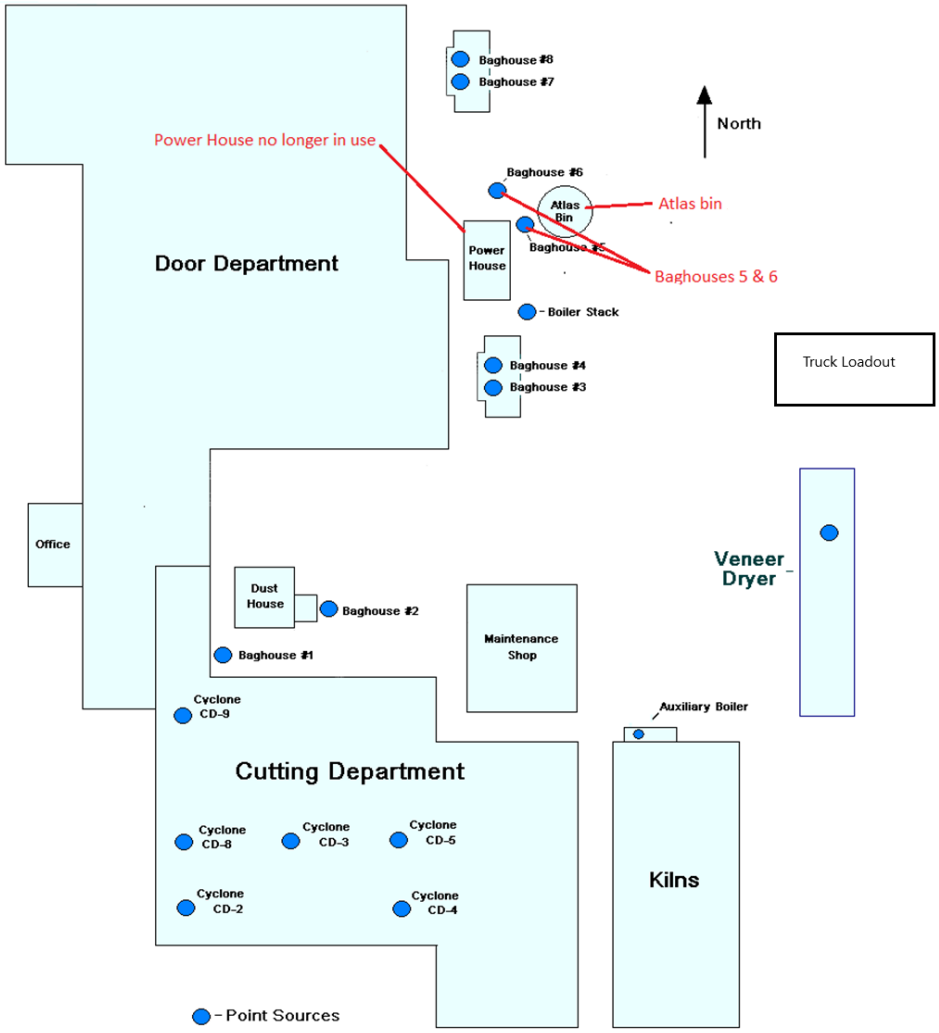
[1]Calculated by ORCAA based on ORCAA approved emission factors and actual operating data from Simpson Door for 2021.
-Does not account for emissions associated with spray coating line nor emergency engine operations

4. FACILITY DESCRIPTION

4.1 Facility History

Simpson Door is an existing wood door manufacturing facility located in McCleary, Washington. The facility has been in existence since the early 1940's. This is officially Simpson Door's fourth AOP, though there have been several revisions and reopenings for cause. Descriptions of Simpson Door's Emission Units are described below.

Figure 4: Emission Unit Locations


Baghouse #8
Baghouse #7
North
Power House no longer in use
Baghouse #6
Atlas Bin
Atlas bin
Baghouse #5
Power House
Door Department
Baghouses 5 & 6
Boiler Stack
Baghouse #4
Baghouse #3
Truck Loadout
Office
Veneer Dryer
Dust House
Baghouse #2
Maintenance Shop
Baghouse #1
Cyclone CD-9
Auxiliary Boiler
Cutting Department
Cyclone CD-8
Cyclone CD-3
Cyclone CD-5
Kilns
Cyclone CD-2
Cyclone CD-4
Point Sources

4.2 Yard

The “Yard” refers to the portion of the facility where lumber sorting, drying, planing and slicing takes place. Operations in the Yard prepare the raw lumber to a quality suitable for making doors. The Yard operates with the goal to maintain an adequate inventory of door making materials, thereby enabling uninterrupted operation of the door making department.

Lumber is transported to the Simpson Door plant by truck and is stored in the Yard. From storage the green stock is sorted by length in preparation for drying in one of twelve lumber dry kilns. Generally, door-making lumber is dried to 8-12% moisture content. After drying, the lumber is planed and then stockpiled inside the warehouse.

Simpson Door’s twelve dry kilns are considered collectively as EU4. They are all indirect, steam heated kilns that are heated with steam from the package boiler. Each kiln is approximately 16’ by 140’ by 12’ high with a capacity of 100,000 board feet per charge. When operating, emissions from the dry kilns consist of water vapor driven off from the wood itself and Volatile Organic Compounds (VOC) including toxic air pollutants (TAP) and Hazardous Air Pollutants (HAP).

Veneer production equipment and operations are also part of the Yard. Kiln dried wood is conditioned in steam vaults, and then in a hot water bath to re-moisturize the wood prior to slicing veneer strips. The veneer is 0.078 inches in thickness, 4 to 6 inches in width and 7 foot in length. After slicing, the veneer is then re-dried in a veneer dryer. The amount going through the dryer equates to 60 square feet per minute. The dryer temperature runs between 270 to 290 degrees Fahrenheit. Emissions from the dryer are exhausted through the roof via two 12 inch diameter vents. Simpson Door’s veneer dryer is recognized as an insignificant emissions unit based on the unit’s potential to emit (see emissions).

4.3 Cutting

The Cutting department processes dried lumber from the Yard into the dimensions needed for manufacturing doors. Also, short pieces of lumber are finger jointed and glued together to produce “core” material that will be used with the veneer in the production of laminated door components. A continuous edge gluer joins pieces of wood together to produce the panel blanks and other components. Finished panels are graded and stacked to be transferred to the Door Department.

The Cutting department produces wood residuals in the form of sawdust, sander dust and various larger wood particles. All wood residual produced at Simpson Door is collected and sold as a byproduct. Wood residual is collected and pneumatically transported to the Atlas Bin prior to loading truck trailers.

4.4 Door Department

At the Door department, various parts and pieces of wood produced in the Cutting Department are carefully machined into the specific door components needed for door assembly. A variety of tenoners, molders, and shapers profile each component to correspond to its use in a specific door design. All of the various door components are then assembled together by hand. The door is then placed in a clamp where hydraulic pressure is used to join the parts tightly together for final fit. The majority of glue used in assembly of the doors is cured using radio frequency microwave technology to expedite the curing.

After assembly, all of the doors receiving glass are first glazed and then sanded, while all of the panel doors go directly to the sander. After sanding, the doors are pre-fit to height and width. Every door is then inspected by a patcher, who repairs any defects before the door is packaged, banded and readied for shipment. Simpson Door permitted a surface coating operation through 20NOC1457, enabling the application of coatings and finishing materials to doors.

4.5 EMISSIONS UNIT DESCRIPTIONS

The following discussions and tables describe emissions units at Simpson Door. Table 4.1 provides a summary list of emissions units. Emissions units at Simpson Door are defined broadly in order to provide the maximum amount of flexibility with respect to permit revisions.

TABLE 4.1: EMISSIONS UNIT SUMMARY

Emissions unit ID#	Description	Exhaust Point ID#	Control Equipment	Effective NOCs
EU1	The wood boiler has been permanently decommissioned.	N/A	N/A	N/A
EU2	Wood Residuals Transport Systems: Particulate emissions from all cyclones serving mill operations such as wood cutting, slicing, planing, sanding, and milling operations.	see Tables 4.3 and 4.4 below	See Tables 4.3 and 4.4 below	11NOC869 16NOC1154
EU3	Package Boiler: 14.7 MMBtu/hr heat input rate 12,100 lbs/hr of steam at 200 psi. Fuels: natural gas and propane	#03 Package Boiler Stack	None	96NOC014 11NOC869
EU4	Lumber Dry Kilns: 12 steam-heated, double-track lumber dry kilns (16' x 140' x 12' ht) with approximately 100,000 board-feet per kiln charge capacity for each kiln.	vents	None	None
EU5	Surface Coating Line: EIBF1410 Spray booth (16’2” W x 20’ L x 12’ H) Filters with overall arrest efficiency of 99%+ Vertical exhaust at height at least 6’ above highest peak of building 5 hp fan Design air flow of 14,000 acfm	Stack	Paint arrestor filters	20NOC1457
EU6	Emergency Engine: Pumphouse diesel engine – 1,500 gpm Rated at 170 bhp Installed February 1976	Vents	None	None
EU7	Emergency Engine: Powerhouse diesel engine – 250kV Rated at 225 kW (302 bhp) Installed 4/14/1976	Vents	None	None
EU8	Glues and Adhesives line – glue spreader rolls used to bond veneers to boards with heated adhesives	Stack	None	21NOC1538

4.6 INSIGNIFICANT EMISSIONS UNITS (IEUs)

In addition to the emission units identified and described in Table 4.1, the Facility includes emissions units that qualify as Insignificant Emissions Units (IEU) under WAC 173-401-530. Designation of an emission unit or activity as an IEU does not exempt the unit or activity from any applicable requirement, including generally applicable requirements. However, testing, monitoring, recordkeeping and reporting required by the AOP are not required for IEUs unless determined by the permitting authority to be necessary to assure compliance, or unless it is otherwise required by a generally applicable requirement of the state implementation plan.

Where a permit does require testing, monitoring, recordkeeping and reporting for an IEU, the Permittee may certify continuous compliance when the testing, monitoring, recordkeeping required by the permit revealed no violations during the period, and there were no observed, documented, or known instances of noncompliance during the reporting period. The permit shield per WAC 173-401-640 does not apply to IEUs.

Simpson Door listed the units and activities described in Table 4.2 as IEUs in their AOP renewal

application. ORCAA reviewed Simpson Door's list of IEUs and concurs that these units and activities qualify as IEUs. ORCAA reviewed Simpson Door's list of IEUs shown in Table 4.2 and determined:

1. Testing, monitoring, recordkeeping and reporting are not necessary to assure compliance with applicable requirements, including generally applicable requirements.
2. No federally enforceable applicable requirements apply to any of the units or activities listed.

TABLE 4.2: IEUs BASED ON SIZE OR INSIGNIFICANT EMISSION RATES

IEU	Location	Capacity	Basis for IEU Designation
Veneer Dryer	Veneer cutting building	not applicable	WAC 173-401-530(4)
MDO Press	Door assembly area	Single opening	WAC 173-401-530(4)
Product Off-Gassing	Product warehouse	not applicable	WAC 173-401-530(d)
Grinding room baghouse	Grinding room	not applicable	WAC 173-401-530(4)(e) or 532(55)
Shop table saw cyclone	Shop	not applicable	WAC 173-401-532(46)
Storage Tank	Glue-cutting	6000 gallons	WAC 173-401-533(2)(a)
Storage Tank	Glue wash water-cutting	500 gallons	WAC 173-401-533(2)(a)
Storage Tank	Glue wash water-cutting	1000 gallons	WAC 173-401-533(2)(a)
Storage Tank	Glue wash water-cutting	1000 gallons	WAC 173-401-533(2)(a)
Welding	Shop	not applicable	WAC 173-401-533(2)(i) or –532(55)
Fuel and propane storage tanks	Near package boiler	10,000 gallon	WAC 173-401-533(2)(c)&(d)
Fuel and propane storage tanks	Aux. boiler diesel - discontinued	5000 gallons	WAC 173-401-533(2)(c)&(d)
Fuel and propane storage tanks	Gas tank-oil house	500 gallons	WAC 173-401-533(2)(c)&(d)
Fuel and propane storage tanks	Diesel tank-oil house	500 gallons	WAC 173-401-533(2)(c)&(d)
Fuel and propane storage tanks	Diesel tank-powerhouse generator	300 gallons	WAC 173-401-533(2)(c)&(d)
Fuel and propane storage tanks	Diesel tank-pumphouse pump	300 gallons	WAC 173-401-533(2)(c)&(d)
Fuel and propane storage tanks	Propane tank-fueling station	1000 gallons	WAC 173-401-533(2)(c)&(d)

Table 4.2 Notes:

1. All IEUs identified in Table 4.2 are subject to only general applicable requirements in the AOP.
2. ORCAA has determined no additional monitoring, record keeping or reporting is required for any of the IEUs identified.
3. All IEUs identified in Table 4.2 were listed in Simpson Door's AOP renewal application.

4.7 Hog Fuel Boiler (EU1, Decommissioned)

Simpson Door ceased operation of the hog fuel boiler on December 23, 2011 and the boiler was decommissioned.

4.8 Residuals Handling (EU2)

Simpson Door's systems for collecting, transporting and storing wood residuals throughout the

facility is a source of particulate air pollution and is regulated as Emissions Unit 2 (EU2) in Simpson Door's AOP. The system includes pneumatic transport ducts, cyclones, baghouses, storage bins and storage buildings. Approximately 8,250 tons of wood residuals are produced by Simpson Door annually including sawdust, sander dust, planer shavings and reject wood that is reduced in size by chipping. Moisture content of the material is fairly consistent and ranges from 8-12% moisture content. All wood residuals are collected and sold as by-products.

Dust-laden air collected throughout the plant is routed to a set of three cyclones (C15) that separate the sawdust into a storage bin referred to as the "Atlas Bin." From the Atlas Bin, sawdust is loaded into fully enclosed truck trailers using an enclosed pneumatic system. During truck trailer loading, displaced air is routed through a baghouse (Carothers Baghouse). The Carothers Baghouse exhausts to the ambient air while the dust cake is pneumatically transferred back to the Atlas Bin. This system was approved in 2016 and replaced the previous sawdust truck bin system.

Tables 4.3 and 4.4 identify primary units in the residuals system (EU2).

TABLE 4.3: ACTIVE CYCLONES

Cyclone ID	Design CFM	Serves	Type material collected	Fate of Catch	Exhaust to
C-2 (planer)	42000	Cutting	Dry sawdust/shavings	C-6	Atmosphere
C-3 (BEG)	15000	Cutting	Dry sawdust/shavings	C-6	Atmosphere
C-4 (hog)	1000	Cutting	Dry Hog fuel	C-6	Atmosphere
C-5 (cutting)	12000	Cutting	Dry Sawdust	C-6	Atmosphere
C-6 (dust house)	30000	Cutting	Dry Sawdust/hog fuel/shavings/sander dust	Dust house or Atlas	Baghouse #2
C-7 (sander)	36000	Cutting	Dry Sander dust/sawdust	C-7, to C-6	Baghouse #1
C-8 (Stickers)	12000	Cutting	Dry Sawdust	C-6	Atmosphere
C-9 (CEG)	6000	Cutting	Dry Sawdust	C-3	Atmosphere
C-10 (door Plant/Finishing)	45000	Door	Dry Sawdust/sander dust	Atlas	Baghouse #8 (formerly 1A)
C-11 (Door Plant/Finishing)	45000	Door	Dry Sawdust	Atlas	Baghouse #7 (formerly 1B)
C-12 (Door Plant)	45000	Door	Dry Sawdust	Atlas	Baghouse #4 (formerly 2A)
C-13 (Door Plant)	45000	Door	Dry Sawdust/hog fuel	Atlas	Baghouse #3 (formerly 2B)
C-14 (Truck Delivery System).	12000	Truck Loadout	Dry Sawdust	Atlas	Baghouse #5
C-15 (Atlas Baghouse)	30000	Atlas Dust Bin	Dry Sawdust	Atlas	Baghouse #6
C-16 (Sawdust Bin filter unit)	12,000	all	DECOMMISSIONED Sawdust and sander dust	Sawdust Bin	Sawdust Bin Filter Unit

TABLE 4.4 BAGHOUSES AND FILTER UNITS

Baghouse ID	Design CFM	Controls	Operating pressure drop	Fate of baghouse catch	Schedule for bag change
Baghouse 1	12000	Exhaust of C7	0.1 to 4 inches	Re-intro to C7	2 years or as necessary

Baghouse2	12000	Exhaust of C6, catch of C7	0.1 to 4 inches	Re-intro to C6	2 years or as necessary
Baghouse 6	30000	Exhaust of Atlas	0.1 to 4 inches	Re-intro to C15	2 years or as necessary
Baghouse 5	12000	Exhaust of Truck Loadout	0.1 to 4 inches	Re-intro to C14	2 years or as necessary
Baghouse 8	45000	Exhaust of C10	0.1 to 4 inches	Re-intro to C10	2 years or as necessary
Baghouse 7	45000	Exhaust of C11	0.1 to 4 inches	Re-intro to C11	2 years or as necessary
Baghouse 4	45000	Exhaust of C12	0.1 to 4 inches	Re-intro to C12	2 years or as necessary
Baghouse 3	45000	Exhaust of C13	0.1 to 4 inches	Re-intro to C13	2 years or as necessary
Sawdust Bin Filter Unit	12,000	All dust collection systems	0.1 to 5 inches	DECOMMISSIONED Sawdust Bin	DECOMMISSIONED

EPA defines "Potential to emit" with respect to Title V applicability as the maximum capacity of a stationary source to emit under its physical and operational design. Any physical or operational limitation on the source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation, or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is enforceable by the Administrator.

As previously stated, Simpson Door has been in operation since the 1940's; decades before ORCAA's existence. Most of the baghouses at Simpson Door were installed and put into service prior to an emphasis being put on setting grain loading standards or filter efficiencies more stringent than generic grain loading standards such as WAC 173-401-060. Therefore, the baghouses at Simpson Door controlling cyclone emissions do not have permitted grain loading standards, permitted filter efficiencies, nor any other emission limit enforceable by the Administrator. Therefore, the baghouse control efficiencies can't be considered for calculating PTE with respect to Title V applicability. As demonstrated in Table 4.5below, the Title V applicability PTE for PM_{10} and $PM_{2.5}$ shown in parenthesis exceed the 100 tons per year major source threshold for both pollutants. The more realistic PTE assuming typical baghouse control efficiencies is also included.

Table 4.5: EU2 PTE

Pollutant	TPY
PM	113.4 (523.2)
PM_{10}	97.0 (520.5)
$PM_{2.5}$	58.7 (517.9)

-PTE calculated by Simpson Door as part of the 22AOP1559 permit application and assumes 8,760 hours per year of operation and typical baghouse control efficiencies. Calculations reviewed by ORCAA staff.
-Emission factors taken from Oregon DEQ AQ-EF03 particulate fractions for wood products. https://www.oregon.gov/deq/FilterPermitsDocs/AQ-EF03.pdf
-PTE assumes baghouse control for cyclones. Title V applicability PTE assuming uncontrolled cyclone emissions is shown in parenthesis.

4.9 Package Boiler (EU3)

Simpson Door's package boiler is designated as EU3 in Simpson Door's AOP. The unit is a 1990

Johnston 350 horsepower boiler rated at 12,100 lbs/hour at 200 psi steam, and a maximum heat input rate is 14.7 MMBtu/hour. It was installed June 7, 1996 for the purpose of augmenting steam production during the winter months. It was originally designed to run on either natural gas or diesel. It was modified in 2012 to run exclusively on natural gas and propane. The package boiler stack height is 32 feet. It is equipped with low-NO_x burners.

Table 4.6: EU3 PTE

Pollutant	TPY if firing Natural Gas	TPY if firing Propane
$PM/PM_{10}/PM_{2.5}$	**0.48**	0.03
SO_2	0.04	**1.05**
NO_x	3.16	**9.10**
CO	**5.30**	5.25
VOC	0.35	**0.70**

-PTE calculated by Simpson Door as part of the 22AOP1559 permit application

4.10 Lumber Dry Kilns (EU4)

Simpson Door operates 12 lumber dry kilns used to dry the stock wood to the desired moisture content suitable for making doors. All of the kilns are indirect steam heated kilns.

Table 4.7 EU4 PTE

Pollutant	TPY if drying Douglas Fir	TPY if drying Hemlock
$PM/PM_{10}/PM_{2.5}$	**1.4**	0.5
VOC	**13.4**	4.2
Acetaldehyde	0.43	**1.1**
Acrolein	0.008	**0.018**
Formaldehyde	**0.019**	0.010
Methanol	0.69	**0.79**
Propionaldehyde	**0.005**	**0.006**
Total HAPs	1.4	**3.2**

-Emissions based on kiln-drying 31,200 MBF/yr

4.11 Surface Coating Line (EU5)

Simpson Door operates a surface coating line to apply primer to doors. Emissions consist of PM, VOC, and TAP. Coatings are spray-applied in a partially-enclosed cross-flow EIBF1410 spray booth. Paint arrestors are rated with a filtering efficiency of at least 99%.

Table 4.8: EU5 PTE

Pollutant	lbs/hr	lbs/day	lbs/yr	tpy
VOC	1.28	10.20	2,653	1.33
Particulate Matter (PM)/$PM_{10}/PM_{2.5}$	0.17	1.37	356	0.18
Dipropylene Glycol Methyl Ether	0.62	4.93	1,283	0.64

(not a HAP or TAP)				
2-Butoxyethanol	0.62	4.93	1,283	0.64
1,2-Propanediol	0.033	0.266	69.079	0.035
1,3 dihydroxymethyl-5,5 dimethylhydantoin (not a HAP or TAP)	0.001	0.005	1.410	0.001
Petroleum Derivative (Napthalene)	0.000	0.001	0.282	0.0001

a. Assumed Petroleum Derivative is Napthalene for TAP review.
b. Transfer efficiency based on WAGNER brochure for GM 4700AC/GM 4700AC-H, Manual Aircoat Spray Guns which states HVLP level transfer efficiency is achievable.
c. Filtering efficiency based on Paint Pockets Co., PK Series filters brochure which states 99.84% average removal efficiency of test filters.
d. PTE based on permitted primer usage rate of 30 gallons per day.
-Taken from 20NOC1457 permit Final Determination

4.12 Emergency Engines (EU6 and EU7)

Simpson Door operates two diesel emergency engines. The first is the diesel emergency engine (EU6) powering the pumphouse emergency/fire pump. The second is the diesel emergency engine (EU7) powering the powerhouse emergency generator to supply power in the event of an outage. Both engines are below ORCAA's permitting threshold (500 brake horsepower) as identified in ORCAA Rule 6.1(c)(28)(ii) but are still subject to 40 CFR Part 63 Subpart ZZZZ and ORCAA's general standards and regulations. The emergency engines were previously listed as insignificant emission units (IEU's) based on PTE under WAC 173-401-530(1)(a). The engines are precluded from being considered insignificant emission units per WAC 173-401-530(2)(a) since they are subject to 40 CFR Part 63, Subpart ZZZZ.

Table 4.9: EU6 PTE

Pollutant	Emission Rate (lb/hr)	Emission Rate (lb/day)	Emission Rate (lb/yr)	Emission Rate (ton/yr)
PM	0.27	0.54	27	0.014
PM_{10}	0.27	0.54	27	0.014
$PM_{2.5}$	0.27	0.54	27	0.014
NOx	4.6	9.2	461	0.23
CO	5.73	11.47	573	0.29
VOC	0.65	1.30	65	0.033
SOx	0.0021	0.0041	0.21	0.0001

Emissions calculated at 100 hours/year per 40 CFR § 63.6640(f) and as permitted under Condition AR5.2c

Table 4.10 EU7 PTE

Pollutant	Emission Rate (lb/hr)	Emission Rate (lb/day)	Emission Rate (lb/yr)	Emission Rate (ton/yr)
PM	0.48	0.96	48	0.024
PM_{10}	0.48	0.96	48	0.024

$PM_{2.5}$	0.48	0.96	48	0.024
NOx	8.2	16	819	0.41
CO	10	20	1,019	0.51
VOC	1.2	2.32	116	0.058
SOx	0.00	0.01	0.37	0.0002

Emissions calculated at 100 hours/year per 40 CFR **§** 63.6640(f) and as permitted under Condition AR5.2c

4.13 Adhesives Coating Line (EU8)

The process Simpson Door uses to apply adhesives to boards is by way of glue spreader rolls. The rolls are heated to about 280 degrees to keep the hot melt adhesive in a fluid state and able to be applied. The glue spreader rolls are encased in a housing and vented out the top of the housing up through the ceiling of the warehouse. The heated roll then rolls adhesives on to the boards as they pass through the housing. Once the board has hot melt adhesive applied via the roller, veneer is placed on the board and sent through a press to bond the veneer to the finished board. There is no control device associated with the adhesives application line. Emissions are vented out the top of the enclosure through a 12: duct and fan and vented out the roof which is 20 feet above the enclosure and 8 feet from the roof to the point at which it releases to the atmosphere. [excerpt, correspondence with Simpson Door personnel]

Table 4.11 EU8 PTE

Pollutant	Emission Rate (lb/hr)	Emission Rate (lb/day)	Emission Rate (lb/yr)	Emission Rate (ton/yr)
PM	0.0029	0.0058	2.12	0.00106
PM_{10}	0.0029	0.0058	2.12	0.00106
$PM_{2.5}$	0.0029	0.0058	2.12	0.00106
VOC	0.745	14.9	5438	2.72
HAP	0.745	14.9	5440	2.72
TAP	0.745	14.9	5440	2.72
MDI	0.0029	0.0058	2.12	0.00106
Formaldehyde	0.0449	0.899	328	0.164
Vinyl Acetate	0.7	14	5110	2.56

Emissions taken from 21NOC1538

5.0 NEW SOURCE REVIEW APPROVALS

The following table provides a summary of conditions from Notice of Construction (NOC) Approval Orders issued to Simpson Door. The right-hand column in the table indicates whether the condition is an ongoing applicable requirement and, if so, the corresponding condition # in the AOP that contains the requirement. Records on file with ORCAA indicate that all past modifications additions and expansions at Simpson Door have complied with state, federal and local new source review requirements including Prevention of Significant Deterioration (PSD) permitting requirements.

Table 5.1: SUMMARY OF AIR REGULATORY HISTORY

NOC # (date)	NOC Approval Description	NOC condition # and description	Applicable?	AOP #
no number (6/23/72)	Approved: 1. New cyclone at powerhouse 2. New Micro-pulsair 100S-8-20 baghouse (15000 cfm) filter at Atlas Bin.	Unconditional	N/A	N/A
no number (9/15/75)	Approved new cyclone to serve to cutting plant	Unconditional	N/A	N/A
no number (11/19/76)	Limited information in NOC application - According to NOC Form 1, project involved installation of system to collect sawdust and shavings.	Unconditional	N/A	N/A
#156 (??/??/????)	Approved new cyclone (#48, 16,000 cfm) exhausting directly to the atmosphere.	Unconditional	N/A	N/A
#159 (1/21/77)	Approved two new baghouses (Aero-Vac filters, American Sheet Metal Inc., Model # Inv-104.17). Each unit rated at 25,500 cfm.	Unconditional	N/A	N/A
#219 (1/27/78)	Approved baghouse #43 and the "door treating line."	Unconditional	N/A	N/A
# 234 (6/15/78)	Approved door manufacturing operations. Limited information in NOC application. Form 1 states use of "mineral spirits."	Unconditional	N/A	N/A
#260 (1/9/79)	Approved baghouse #46 serving cyclones No. 30, 31 and 32 on Atlas Bin.	Unconditional	N/A	N/A
no number (1/25/79)	Approved baghouse #35 serving cyclone #35 over the dust building.	Unconditional	N/A	N/A
#331 (6/29/82)	Approved replacement of cyclone #39 serving planer and fingerjoint process.	Unconditional	N/A	N/A
96NOC014 (6/7/96)	Approved dual fuel package boiler (EU3)	1. Completion Notice	Not an ongoing applicable requirement.	N/A
		2. Technical Specifications	Not an ongoing applicable requirement.	N/A
		3. Boiler Particulate Limit	Applicable Requirement	AR3.2
		4. Boiler Opacity Limit	Applicable Requirement	AR3.3

NOC # (date)	NOC Approval Description	NOC condition # and description	Applicable?	AOP #
		5. Boiler Fuel Standards	Superseded by 11NOC869 Condition 4a	N/A
		6. NO_x Limit	Applicable Requirement	AR3.4
		7. CO Limit	Applicable Requirement	AR3.5
		8. Operations and Maintenance Plan	Applicable Requirement	AR3.8
		9. Requires reporting in accordance with Title V AOP.	Redundant Applicable Requirement	N/A
		10. Excess Emissions Reporting	Applicable Requirement	R4(c)
		11. General "duty to comply" requirement.	Redundant requirement covered in the standard terms and conditions in Simpson Door's AOP	N/A
02NOC256 Exempt (7/22/2003)	ORCAA determined that the new veneer slicing and drying unit was exempt from NOC approval.	No conditions	N/A	N/A
05NOC430 Application withdrawn	Requested approval to evaporate glue waste-water in the existing hog fuel boiler. (6/16/2006)	NOC application withdrawn by Simpson Door since the project was cancelled	N/A	N/A
06NOC514 (12/19/2006)	Approved new hot press to apply medium density overlay (MDO) paper onto doors.	No conditions	N/A	N/A
11NOC869 (3/28/2012)	Approved: 1. Sawdust Bin Baghouse 2. Package Boiler Modification 3. Decommissioning of Wood-Fired Boiler	1. Technical Specifications	Not an ongoing applicable requirement.	N/A
		2. Wood-fired boiler will be permanently decommissioned	Not an ongoing applicable requirement. ORCAA verified the wood fired boiler is disabled and cannot be fired.	N/A
		3. Sawdust Bin Specifications	Sawdust bin has been removed from the facility.	N/A
		4.a. The package boiler shall combust only natural gas or propane fuel.	Applicable Requirement	AR3.1
		4.b. Emissions shall be minimized by assuring proper combustion at all times the boiler is operating.	Applicable Requirement	AR3.6
		4.c. Emissions monitoring requirement	Applicable Requirement	M9
		4.d. Maintaining proper combustion	Applicable Requirement	AR3.7
		4.e. Monitoring equipment	Applicable Requirement	M9
		4.f. Corrective actions shall be initiated promptly	Applicable Requirement	AR3.7

NOC # (date)	NOC Approval Description	NOC condition # and description	Applicable?	AOP #
		5.a. EU3 fuel records	Applicable Requirement	RK3
		5.b. EU3 operating concentrations for O_2, NO_x and CO	Applicable Requirement	RK3
		5.c. EU3 monitoring records	Applicable Requirement	RK3
		5.d. Baghouse maintenance records	Superseded by condition 3 of 16NOC1154	SUPERSEDED
16NOC1154 (8/15/2016)	Approved replacement of the sawdust bin and associated baghouse (approved under 11NOC869) with a new sawdust storage and truck loading system.	1. Technical Specifications	Not an ongoing applicable requirement.	N/A
		2.a. The Atlas Bin shall vent through a fabric filter baghouse.	Applicable Requirement	AR2.1
		2.b. Visible emissions from the Atlas Bin baghouse shall not exceed five percent opacity.	Applicable Requirement	AR2.2
		3. The permittee shall maintain record of actions taken to maintain the Atlas Bin baghouse.	Applicable Requirement	RK3
20NOC1457 (10/27/2020)	Conditional approval to install a spray booth for priming doors.	1. Technical Specifications	Not an ongoing applicable requirement.	N/A
		2. Approved Primer composition and material usage limits	Applicable Requirement	AR4.1
		3. Spray booth design requirements.	Applicable Requirement	AR4.2
		4. Spray booth operating requirements.	Applicable Requirement	AR4.3
		5. Spray booth monitoring requirements.	Applicable Requirement	M10
		6. Spray booth recordkeeping requirements	Applicable Requirement	RK3
21NOC1538 (Date NOC Final)	Establish adhesives material usage and set emission limits for new adhesives formulations	1. Adhesive Material Emission Limits	Applicable Requirement	AR6.1
		2. Recordkeeping requirements	Applicable Requirement	RK3

Simpson Door's dry kilns predate NSR and have no conditional requirements. ORCAA's general standards and regulations still apply.

6.0 REGULATORY DETERMINATIONS

6.1 Effective Versions of Applicable Requirements

Effective versions of each applicable requirement in the AOP for the Simpson Door Facility are the versions that were effective on the date the AOP was issued.

6.2 Title V of the Federal Clean Air Act

The Facility is a major source of criteria air pollutants and, therefore, subject to Title V of the Federal Clean Air Act. The Facility has operated under either a permit application shield or under an effective AOP continuously since it became subject to Title V.

6.3 New Source Performance Standards (NSPS)

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

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

40 CFR Part 60, Subpart Dc (Subpart Dc) contains new source performance standards for steam generating units built after June 9, 1989, and having a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr).

Wood Fired Boiler (EU1)
Simpson Door's wood fired boiler (EU1) was decommissioned December 6, 2011. EU1 remains in place but is disabled and can't be fired.

Package Boiler (EU3)
Simpson Door's package boiler (EU3) has a heat input rate within this applicable size range and was constructed (installed) in June of 1996, which is after the effective date of the NSPS. Therefore, EU3 is subject to the requirements of Subpart Dc. The boiler was modified in 2012 to burn only natural gas or propane. Table 6.1 below lists all requirements from 40 CFR Part 60 Dc that apply to EU3 and shows the corresponding AOP condition incorporating each requirement.

TABLE 6.1: 40 CFR Part 60, Subpart Dc (and A) Requirements Applying to Package Boiler (EU3)

CITATION	REQUIREMENT	APPLICABLE?	CONDITION
§60.40c	**Applicability:** a) Except as provided in paragraphs (d), (e), (f), and (g) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr).	No applicable requirements in this subsection.	N/A
§60.41c	**§ 60.41c Definitions.** As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act and in subpart A of this part.	No applicable requirements in this subsection.	N/A

CITATION	REQUIREMENT	APPLICABLE?	CONDITION
§60.42c, (a)-(c)	**§ 60.42c Standard for sulfur dioxide (SO_2).** **Standards for affected facilities burning coal.**	No – EU3 combusts only natural gas or propane.	N/A
§60.42c, (d)	**§ 60.42c Standard for sulfur dioxide (SO_2).** (d) On and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that combusts oil shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO_2in excess of 215 ng/J (0.50 lb/MMBtu) heat input; or, as an alternative, no owner or operator of an affected facility that combusts oil shall combust oil in the affected facility that contains greater than 0.5 weight percent sulfur. The percent reduction requirements are not applicable to affected facilities under this paragraph.	No – EU3 combusts only natural gas or propane.	N/A
§60.42c, (e)	**§ 60.42c Standard for sulfur dioxide (SO_2).** (e) Standards for affected facilities combusting coal or oil with any other fuels.	No – EU3 combusts only natural gas or propane.	N/A
§60.42c, (f)	**§ 60.42c Standard for sulfur dioxide (SO_2).** **(f)** Reduction in the potential SO_2 emission rate through fuel pretreatment is not credited toward the percent reduction requirement under paragraph (b)(2) of this section unless…	No – EU3 combusts only natural gas or propane.	N/A
§60.42c, (g)	**§ 60.42c Standard for sulfur dioxide (SO_2).** (g) Except as provided in paragraph (h) of this section, compliance with the percent reduction requirements, fuel oil sulfur limits, and emission limits of this section shall be determined on a 30-day rolling average basis.	No – EU3 combusts only natural gas or propane.	N/A
§60.42c, (h)	**§ 60.42c Standard for sulfur dioxide (SO_2).** (h) For affected facilities listed under paragraphs (h)(1), (2), or (3) of this section, compliance with the emission limits or fuel oil sulfur limits under this section may be determined based on a certification from the fuel supplier, as described under §60.48c(f), as applicable. (1) Distillate oil-fired affected facilities with heat input capacities between 2.9 and 29 MW (10 and 100 MMBtu/hr). (2) Residual oil-fired affected facilities with heat input capacities between 2.9 and 8.7 MW (10 and 30 MMBtu/hr). (3) Coal-fired facilities with heat input capacities between 2.9 and 8.7 MW (10 and 30 MMBtu/hr).	No – EU3 combusts only natural gas or propane.	N/A
§60.42c, (i)	**§ 60.42c Standard for sulfur dioxide (SO_2).** (i) The SO_2emission limits, fuel oil sulfur limits, and percent reduction requirements under this section apply at all times, including periods of startup, shutdown, and malfunction.	No – EU3 combusts only natural gas or propane.	N/A
§60.42c, (j)	**§ 60.42c Standard for sulfur dioxide (SO_2).** (j) For affected facilities located in noncontinental areas and affected facilities complying with the percent reduction standard…	No. Simpson Door is not located in a noncontinental area	N/A
§60.43c, (a)-(b)	**§60.43c Standards for Particulate Matter (PM)** Establishes PM standards for coal and wood fired units.	No – EU3 combusts only natural gas or propane.	N/A
§60.43c, (c)	**§60.43c Standards for Particulate Matter (PM)** (c) Establishes opacity standards for coal, wood and oil fired units with a heat input capacity greater than 30 MMBtu/hr.	No – EU3 combusts only natural gas or	N/A

CITATION	REQUIREMENT	APPLICABLE?	CONDITION
		propane.	
§60.43c, (d)	**§60.43c Standards for Particulate Matter (PM)** (d) Requires that the PM and opacity standards of this section apply at all times, except during periods of startup, shutdown or malfunction.	No - EU3 not subject to PM or opacity standards of 40 CFR Part 60.	N/A
§60.43c, (e)	**§60.43c Standards for Particulate Matter (PM)** (e) Establishes PM standards for coal, wood and oil fired units with a heat input capacity greater than 30 MMBtu/hr.	No – EU3 combusts only natural gas or propane.	N/A
§60.44c, (h)	**§60.44c Compliance and Performance Test Methods and Procedures for Sulfur Dioxide** (h) For affected facilities subject to §60.42c(h)(1), (2), or (3) where the owner or operator seeks to demonstrate compliance with the SO_2standards based on fuel supplier certification, the performance test shall consist of the certification from the fuel supplier, as described in §60.48c(f), as applicable.	No – EU3 not subject to SO_2 standards of 40 CFR Part 60.	N/A
§60.44c, (a)-(j) Except (h)	**§60.44c Compliance and Performance Test Methods and Procedures for Sulfur Dioxide**	No – EU3 not subject to SO_2 standards of 40 CFR Part 60.	N/A
§60.45c Entire section	**§60.45c Compliance and Performance Test Methods and Procedures for Particulate Matter**	No - EU3 not subject to PM or opacity standards of 40 CFR Part 60.	N/A
§60.46c, Entire section	**§60.46c Emissions Monitoring for Sulfur Dioxide**	No – EU3 not subject to SO_2 standards of 40 CFR Part 60.	N/A
§60.46c, (e)	**§60.46c Emissions Monitoring for Sulfur Dioxide** (e) The monitoring requirements of paragraphs (a) and (d) of this section shall not apply to affected facilities subject to §60.42c(h)(1), (2), or (3) where the owner or operator of the affected facility seeks to demonstrate compliance with the SO_2standards based on fuel supplier certification, as described under §60.48c(f), as applicable.	No – EU3 not subject to SO_2 standards of 40 CFR Part 60.	N/A
§60.47c, Entire section	**§60.47c Emissions Monitoring for Particulate Matter**	No. EU3 is not subject to any PM or opacity standards of the Subpart.	N/A
§60.48c, (a)	**§60.48c Reporting and Recordkeeping Requirements** (a) The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction and actual startup, as provided by §60.7 of this part. This notification shall include…	No - This is not an ongoing applicable requirement.	N/A
§60.48c, (b)	**§60.48c Reporting and Recordkeeping Requirements** (b) The owner or operator of each affected facility subject to the SO_2emission limits of §60.42c, or the PM or opacity limits of §60.43c, shall submit to the Administrator the performance test data from the initial and any subsequent performance tests and, if applicable, the performance evaluation of the CEMS and/or COMS using the applicable performance specifications in appendix B of this part.	No – EU3 not subject to SO_2 standards of 40 CFR Part 60.	N/A
§60.48c, (c)	**§60.48c Reporting and Recordkeeping Requirements**	No - EU3 not	N/A

CITATION	REQUIREMENT	APPLICABLE?	CONDITION
	(c) In addition to the applicable requirements in §60.7, the owner or operator of an affected facility subject to the opacity limits in §60.43c(c) shall …	subject to PM or opacity standards of 40 CFR Part 60.	
§60.48c, (d)	**§60.48c Reporting and Recordkeeping Requirements** (d) The owner or operator of each affected facility subject to the SO_2emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c shall submit reports to the Administrator.	No – EU3 not subject to SO_2 standards of 40 CFR Part 60.	N/A
§60.48c, (e)	**§60.48c Reporting and Recordkeeping Requirements** (e) The owner or operator of each affected facility subject to the SO_2emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c shall keep records and submit reports as required under paragraph (d) of this section, including the following information, as applicable…	No – EU3 not subject to SO_2 standards of 40 CFR Part 60.	N/A
§60.48c, (f)	**§60.48c Reporting and Recordkeeping Requirements** (f) Fuel supplier certification shall include the following information…	No – EU3 not subject to SO_2 standards of 40 CFR Part 60.	N/A
§60.48c, (g)	**§60.48c Reporting and Recordkeeping Requirements** (g)(1) Except as provided under paragraphs (g)(2) and (g)(3) of this section, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day. (2) As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO_2standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.	Yes	RK14
§60.48c, (h)	**§60.48c Reporting and Recordkeeping Requirements** (h) The owner or operator of each affected facility subject to a federally enforceable requirement limiting the annual capacity factor for any fuel or mixture of fuels …	No - EU3 is not subject to a capacity factor limit.	N/A
§60.48c, (i)	**§60.48c Reporting and Recordkeeping Requirements** (i) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.	Yes	RK1
§60.48c, (j)	**§60.48c Reporting and Recordkeeping Requirements** (j) The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.	No reports required for gaseous fueled units.	N/A

40 CFR Part 60, Subpart A – General Provisions

If an NSPS from 40 CFR Part 60 applies to a piece of equipment, certain requirements from 40 CFR part 60, Subpart A are triggered and also apply. Subpart A includes general provisions and requirements for record keeping, notifications, testing and monitoring, but does not contain any applicable emissions limitations. Since the package boiler (EU3) at Simpson Door is subject to Subpart Dc, requirements from Subpart A also apply and are worked into Simpson Door's

AOP.

Only those requirements from Subpart A that apply to Simpson Door on an ongoing basis are incorporated into their AOP. Requirements that apply when triggered by any new action such as construction of a new "affected facility," one time requirements with past due dates such as initial notification requirements, requirements applying to the regulatory agency and requirements for specific types of monitoring equipment that are not used at the facility are not are not incorporated into the AOP. However, the fact that these requirements were not included in the AOP does not exempt Simpson Door from the requirement if they are triggered by some future action. Table 6.2 below lists all requirements from 40 CFR Part 60 A that apply to the package boiler (EU3) and shows the corresponding AOP condition incorporating each requirement.

TABLE 6.2: Subpart A Requirements Applying to Package Boiler

CITATION	REQUIREMENT	APPLICABLE?	CONDITION
§60.1 – §60.6	**§60.1 Applicability** **§60.2 Definitions** **§60.3 Units and abbreviations** **§60.4 Address** **§60.5 Determination of construction or modification** **§60.6 Review of plans.**	No ongoing applicable requirements.	N/A
§60.7, (a)(1)	**§60.7 Notification and Record Keeping** (a)(1) A notification of the date construction (or reconstruction as defined under §60.15) of an affected facility is commenced postmarked no later than 30 days after such date. This requirement shall not apply in the case of mass-produced facilities which are purchased in completed form.	No – One-time requirement.	N/A
§60.7, (a)(2)	**§60.7 Notification and Record Keeping** [Reserved]	N/A	N/A
§60.7, (a)(3)	**§60.7 Notification and Record Keeping** (a)(3) A notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.	No – One-time requirement.	N/A
§60.7, (a)(4)	**§60.7 Notification and Record Keeping** (a)(4) Notification of physical or operational changes.	No – applicable when triggered by an action.	N/A
§60.7, (a)(5)	**§60.7 Notification and Record Keeping** (a)(5) Notification of the date upon which demonstration of the continuous monitoring system performance commences.	No - EU3 not subject to continuous monitoring system under 40 CFR Part 60.	N/A
§60.7, (a)(6)	**§60.7 Notification and Record Keeping** (a)(6) A notification of the anticipated date for conducting the opacity observations required by §60.11(e)(1) of this part.	No - EU3 not subject to 40 CFR Part 60 opacity standards.	NA
§60.7(a)(7)	**§60.7 Notification and Record Keeping** (a)(7) Notification that continuous opacity monitoring system data results will be used to determine compliance with the applicable opacity.	No - EU3 not subject to 40 CFR Part 60 opacity standards.	N/A
§60.7(b)	**§60.7 Notification and Record Keeping** (b) Any owner or operator subject to the provisions of this part shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any	Yes	RK3

CITATION	REQUIREMENT	APPLICABLE?	CONDITION
	malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.		
§60.7, (c)-(d)	**§60.7 Notification and Record Keeping** (c)-(d) Each owner or operator required to install a continuous monitoring device shall submit …	No - EU3 not required to install a continuous monitoring device per 40 CFR Part 60.	N/A
§60.7, (e)	**§60.7 Notification and Record Keeping** (e) Notwithstanding the frequency of reporting requirements specified in paragraph (c) of this section, an owner or operator who is required by an applicable subpart to submit excess emissions and monitoring systems performance reports (and summary reports) on a quarterly (or more frequent) basis may reduce the frequency of reporting for that standard to semiannual if the following conditions are met:	No – Excess emissions and monitoring systems performance reports not required.	N/A
§60.7, (f)	**§60.7 Notification and Record Keeping** f) Any owner or operator subject to the provisions of this part shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements;	No – EU3 subject to only work practice standards of 40 CFR Part 60, not emissions limits.	N/A
§60.7, (g)	**§60.7 Notification and Record Keeping** (g) If notification substantially similar to that in paragraph (a) of this section is required by any other State or local agency, sending the Administrator a copy of that notification will satisfy the requirements of paragraph (a) of this section.	No - EU3 is not subject to any of the notification requirements of §60.7(a).	N/A
§60.7, (h)	**§60.7 Notification and Record Keeping** (h) Individual subparts of this part may include specific provisions which clarify or make inapplicable the provisions set forth in this section.	No applicable requirements	N/A
§60.8 Entire section	**§60.8 Performance tests**	No - EU3 not subject to any performance testing under 40 CFR Part 60.	N/A
§60.9 Entire section	**§60.9 Availability of Information** The availability to the public of information provided to, or otherwise obtained by, the Administrator under this part shall be governed by part 2 of this chapter. (Information submitted voluntarily to the Administrator for the purposes of §§60.5 and 60.6 is governed by §§2.201 through 2.213 of this chapter and not by §2.301 of this chapter.)	No requirements that apply to EU3.	N/A
§60.10 Entire section	**§60.10 State Authority** The provisions of this part shall not be construed in any manner to preclude any State or political subdivision thereof from…	No applicable requirements.	N/A
§60.11(a)-(c)	**§60.11(a)-(c) includes compliance requirements for affected facilities subject to an opacity standard**	No – EU3 not subject to an opacity standard under 40 CFR Part 60.	N/A
§60.11(d)	**§60.11(d): General duty to minimize emissions.**	Yes	AR3.6
§60.11(e)-(g)	**§60.11(e)-(g) includes general compliance demonstration requirements for affected facilities subject to an emissions limit from 40 CFR Part 60.**	No – EU3 only subject to work practice standards under 40 CFR Part	N/A

CITATION	REQUIREMENT	APPLICABLE?	CONDITION
		60, not emissions limits.	
§60.12 Entire section	**Circumvention prohibited.**	Yes	PA5
§60.13 Entire section	**§60.13 Monitoring Requirements**	No – EU3 only subject to work practice standards under 40 CFR Part 60, not emissions limits.	N/A
§60.14 - §60.17	**§60.14 Modification** **§60.15 Reconstruction** **§60.16 Priority List** **§60.17 Incorporations by reference**	No ongoing applicable requirements applying to EU3.	N/A
§60.18 Entire section	**§60.18 General Control Device and Work Practice Requirements**	No ongoing requirements for EU3.	N/A
§60.19 (a)	**§60.19 General Notification and Reporting Requirements Contains administrative requirements and clarifications for reporting.**	No ongoing requirements for EU3.	N/A

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

40 CFR Part 60, Subpart Db (Subpart Db) contains new source performance standards for steam generating units built after June 19, 1984, with heat input rates greater than 100 million Btu per hour (MMBtu/hr), including wood fired boilers. Subpart Db includes standards for oxide of nitrogen, sulfur dioxide, particulate matter emissions and opacity. In addition, Subpart Db requires testing, monitoring, record keeping and reporting in accordance with the general requirements under 40 CFR Part 60, Subpart A.

Package Boiler (EU3)

Simpson Door's package boiler (EU3) has a maximum design heat rate less than 100 MMBtu/hr and is, therefore, not subject to Subpart Db.

40 CFR Part 60, Subpart CCCC: Standards of Performance for Commercial and Industrial Solid Waste Incinerators

Subpart CCCC applies to incinerators that combust commercial or industrial non-hazardous solid waste with or without energy recovery.

Package Boiler (EU3)

Simpson Door's package boiler (EU3) burns only gaseous fuel and, therefore, is not subject to Subpart CCCC of 40 CFR Part 60.

6.4 National Emissions Standards for Hazardous Air Pollutants (NESHAP)

Boiler and Plywood MACT Standards

EPA has established National Emission Standards for Hazardous Air Pollutants (Referred to as MACT standards) under 40 CFR Part 63 to regulate HAP emissions from major sources of HAP. A major source as any facility that has the potential to emit more than 10 tons per year of a single HAP or more than 25 tons per year of all HAPs combined.

Two MACT standards in 40 CFR Part 63 are relevant to wood products facilities: The Plywood and Composite Wood Products MACT (Plywood MACT); and, the Industrial/Commercial/Institutional Boilers and Process Heaters MACT (Boiler MACT). Both MACT standards were reviewed for applicability to equipment and operations at Simpson Door. The Boiler MACT applies to industrial, commercial or institutional boilers and process heaters located at, or part of, a major source of HAP emissions. The Plywood MACT applies to plywood and composite wood products manufacturing facilities located at, or part of, a major source of HAP emissions.

A major source of HAP emissions is any stationary source or group of stationary sources within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year. However, Simpson Door is a minor source with respect to HAP emissions (see above tables). Therefore, Simpson Door is not subject to either the Plywood MACT or the Boiler MACT.

40 CFR Part 63, Subpart JJJJJJ: Area Source Boiler MACT

In June of 2010, EPA proposed the NESHAP for boilers and process heaters at "Area Sources" of hazardous air pollutants. The term "Area Sources" refers to sources of HAP emissions that are not major. The rule was signed by the EPA Administrator on February 22, 2011 and was posted on the Federal Register on March 21, 2011. 40 CFR § 63.11195(e) exempts gas-fired boiler from Subpart JJJJJJ. Because Simpson Door's remaining operational boiler, the package boiler (EU3), burns only gaseous fuel, Subpart JJJJJJ is not applicable.

40 CFR Part 63, Subpart A – General Provisions

Emergency Engines (EU6 and EU7)

If a NESHAP from 40 CFR Part 63 applies to a piece of equipment, certain requirements from 40 CFR part 63, Subpart A are triggered and also apply. Subpart A includes general provisions and requirements for record keeping, notifications, testing and monitoring, but does not contain any applicable emissions limitations. Since the emergency engines (EU6 and EU7) at Simpson Door are subject to Subpart ZZZZ, requirements from Subpart A also apply and are worked into Simpson Door's AOP.

Only those requirements from Subpart A that apply to Simpson Door on an ongoing basis are

incorporated into their AOP. Requirements that apply when triggered by any new action such as construction of a new "affected facility," one time requirements with past due dates such as initial notification requirements, requirements applying to the regulatory agency and requirements for specific types of monitoring equipment that are not used at the facility are not are not incorporated into the AOP. However, the fact that these requirements were not included in the AOP does not exempt Simpson Door from the requirement if they are triggered by some future action. Table 6.3 below lists all requirements from 40 CFR Part 63 Subpart A that apply to the emergency engines (EU6 and EU7) and shows the corresponding AOP condition incorporating each requirement.

TABLE 6.3: 40 CFR Part 63, Subpart A Requirements Applying to Emergency Engines

Citation	Requirement	Applicable?	Condition
Title 40 CFR 63.1(a)(1)–(12)	**General Applicability**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.1(b)(1)–(3)	**Initial Applicability Determination**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.1(c)(1)	**Applicability After Standard Established**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.1(c)(2)	**Applicability of Permit Program for Area Sources**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.2	**Definitions**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.3(a)–(c)	**Units and Abbreviations**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.4(a)(1)–(5)	**Prohibited Activities and Circumvention**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.4(b)–(c)	**Circumvention/Fragmentation**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.5	**Construction and Reconstruction**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.6(a)	**Compliance With Standards and Maintenance Requirements—Applicability**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.6(b)(1)–(4)	**Compliance Dates for New and Reconstructed Sources**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.6(b)(5)	**Notification**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.6(b)(7)	**Compliance dates for new and reconstructed area sources that become major sources**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.6(c)(1)-(2)	**Compliance dates for existing sources**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.6(c)(5)	**Compliance dates for existing area sources that become major sources**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.6(f)(1)	**Applicability of standards**	No	N/A
Title 40 CFR 63.6(f)(3)	**Finding of compliance**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.6(g)(1)–(3)	**Use of an Alternative Standard**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.6(i)(1)–(14)	**Extension of Compliance**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.6(j)	**Presidential Compliance Exemption**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.7(a)(1)-(2)	**Performance Test Dates**	Subpart ZZZZ contains performance test dates at Title 40 CFR 63.6610, 63.6611, 63.6612	N/A
Title 40 CFR 63.7(a)(3)	**FCAA Section 114 Authority**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.7(b)(1)	**Notification of Performance Test**	Only applies as specified in Title 40 CFR	N/A

		63.6645	
Title 40 CFR 63.7(b)(2)	**Notification of Rescheduling**	Only applies as specified in Title 40 CFR 63.6645	N/A
Title 40 CFR 63.7(c)	**Quality Assurance (QA) Test Plan**	Only applies as specified in Title 40 CFR 63.6645	N/A
Title 40 CFR 63.7(d)	**Testing Facilities**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.7(e)(2)	**Conditions for Conducting Performance Tests**	Subpart ZZZZ specifies test methods at Title 40 CFR 63.6620	N/A
Title 40 CFR 63.7(e)(3)	**Test Duration**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.7(e)(4)	**Other testing under section 114 of FCAA**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.7(f)	**Alternative Test Method**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.7(g)	**Performance Test Data Analysis**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.7(h)	**Waiver of Tests**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.8(a)(1)	**Applicability of Monitoring Requirements**	Subpart ZZZZ contains specific requirements for monitoring at Title 40 CFR 63.6625	N/A
Title 40 CFR 63.8(a)(2)	**Performance Specifications**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.8(b)(1)	**Monitoring**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.8(b)(2)-(3)	**Multiple effluents and monitoring systems**	No	N/A
Title 40 CFR 63.8(c)(1)	**Monitoring system operation and maintenance**	No	N/A
Title 40 CFR 63.8(c)(1)(i)	**Routine and predictable SSM**	No	N/A
Title 40 CFR 63.8(c)(1)(ii)	**SSM not in Startup Shutdown Malfunction Plan**	No	N/A
Title 40 CFR 63.8(c)(1)(iii)	**Compliance with operation and maintenance requirements**	No	N/A
Title 40 CFR 63.8(c)(2)–(3)	**Monitoring system installation**	No	N/A
Title 40 CFR 63.8(c)(4)	**Continuous monitoring system (CMS)**	Subpart ZZZZ does not require Continuous Opacity Monitoring System (COMS)	N/A
Title 40 CFR 63.8(c)(6)-(8)	**CMS requirements**	Subpart ZZZZ does not require COMS	N/A
Title 40 CFR 63.8(d)	**CMS quality control**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.8(e)	**CMS performance evaluation**	Only applies as specified in Title 40 CFR 63.6645	N/A
Title 40 CFR 63.8(f)(1)-(5)	**Alternative monitoring method**	Only applies as specified in Title 40 CFR 63.6645	N/A
Title 40 CFR 63.8(f)(6)	**Alternative to relative accuracy test**	No	N/A
Title 40 CFR 63.8(g)	**Data reduction**	Provisions for COMS are not applicable. Averaging periods for demonstrating compliance are specified at Title 40 CFR 63.6635 and 63.6640.	N/A
Title 40 CFR 63.9(a)	**Applicability and State delegation of notification requirements**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.9(b)(1)–(5)	**Initial notifications**	Only applies as specified in Title 40 CFR 63.6645	N/A
Title 40 CFR 63.9(c)	**Request for compliance extension**	Only applies as specified in Title 40 CFR 63.6645	N/A
Title 40 CFR 63.9(d)	**Notification of special compliance**	Only applies as specified in Title 40 CFR	N/A

	requirements for new sources	63.6645	
Title 40 CFR 63.9(e)	**Notification of performance test**	Only applies as specified in Title 40 CFR 63.6645	N/A
Title 40 CFR 63.9(g)(1)	**Notification of performance evaluation**	Only applies as specified in Title 40 CFR 63.6645	N/A
Title 40 CFR 63.9(g)(3)	**Notification that criterion for alternative to RATA is exceeded**	Only applies as specified in Title 40 CFR 63.6645 if alternative is in use	N/A
Title 40 CFR 63.9(h)(1)-(6)	**Notification of Compliance Status**	Notifications for sources using a CEMS are due 30 days after completion of performance evaluations.	N/A
Title 40 CFR 63.9(i)	**Adjustment of Submittal Deadlines**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.9(j)	**Change in Previous Information**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.10(a)	**Recordkeeping/Reporting—Applicability and General Information**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.10(b)(1)	**General Recordkeeping Requirements**	Yes.	RK3
Title 40 CFR 63.10(b)(2)(vi)-(xi)	**Records**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.10(b)(xii)	**Record when under waiver**	Applicable if triggered.	N/A
Title 40 CFR 63.10(b)(2)(xiii)	**Records of when Using Alternative to Relative Accuracy Test**	For CO standard if using RATA alternative	N/A
Title 40 CFR 63.10(b)(2)(xiv)	**Records supporting notifications**	Yes.	RK3
Title 40 CFR 63.10(b)(3)	**Recordkeeping Requirements for Applicability Determinations**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.10(c)	**Additional records for CEMS**	No	N/A
Title 40 CFR 63.10(d)(1)	**General Reporting Requirements**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.10(d)(2)	**Reports of Performance Test Results**	No	N/A
Title 40 CFR 63.10(d)(4)	**Progress Reports for Sources With Compliance Extensions**	No	N/A
Title 40 CFR 63.10(e)(1) & (2)(i)	**Additional CMS reports**	No	N/A
Title 40 CFR 63.10(e)(3)	**Excess emission and parameter exceedances reports**	No	N/A
Title 40 CFR 63.10(f)	**Recordkeeping/Reporting Waiver**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.12	**State Authority and Delegations**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.13	**Addresses of State Air Pollution Control Agencies and EPA Regional Offices**	Yes, but no ongoing requirements	N/A
Title 40 CFR 63.14	**Incorporation by Reference**	Test methods incorporated by reference	N/A
Title 40 CFR 63.15	**Availability of Information/Confidentiality**	Yes, but no ongoing requirements	N/A

40 CFR Part 63, Subpart ZZZZ: NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE)

Subpart ZZZZ establishes national emission limitations and operating limitations for HAP emitted from stationary RICE located at major and area sources of HAP emissions. Subpart ZZZZ also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations.

Emergency Engines (EU6 and EU7)

The diesel RICE powering the powerhouse emergency generator and the diesel RICE powering the pumphouse emergency/fire pump are both classified as existing emergency engines rated less than 500 horsepower with respect to Subpart ZZZZ. The following table identifies the Subpart ZZZZ applicability determination for the RICE. Unless otherwise specified, all determinations apply to both sets of diesel RICE.

Table 6.4 ZZZZ Applicability Determination

CITATION	SUBJECT	APPLICABLE	CONDITION
§63.6580	**What is the purpose of this subpart?**	Yes, although no ongoing requirements	N/A
§63. 6585	**Am I subject to this subpart? – Stationary RICE**		
§63.6585(a)	**Stationary RICE definition**	Yes, although no ongoing requirements	N/A
§63.6585(b)	**Major Source definition**	No – Facility does not meet major source definition of HAP	N/A
§63.6585(c)	**Area Source definition**	Yes – Facility meets area source definition of HAP	N/A
§63.6585(d)	**Area sources not subject to requirement to obtain a 40 CFR Part 70 or 71 air operating permit.**	No – Facility is otherwise required to operate under a Title V air operating permit.	N/A
§63.6585(d)-(e)	**Other requirements**	No – These provisions do not apply.	N/A
§63. 6590	**What part of my plant does this subpart cover?**		
§63. 6590(a)(1)	**Affected Source - Existing stationary RICE**	Yes – Emergency RICE are existing units as they are each less than 500 bhp and installed prior to June 12, 2006 (both installed in 1976).	N/A
§63. 6590(a)(2)	**Affected Source - New stationary RICE**	No – RICE is regulated as an existing stationary RICE	N/A
§63. 6590(a)(3)	**Affected Source - Reconstructed stationary RICE**	No	N/A

§63. 6590(b)	**Stationary RICE subject to limited requirements**	No	N/A
§63. 6590(c)	**Stationary RICE subject to Part 60**	No. RICE are not new nor reconstructed.	N/A
§63. 6595	**When do I have to comply with this subpart?**		
§63. 6595(a)(1)	**Compliance dates for existing stationary RICE at major sources of HAP**	Effective May 3, 2013	N/A
§63. 6595(a)(2)	**Compliance dates for starting up new or reconstructed stationary RICE at major sources before August 16, 2004.**	No	N/A
§63. 6595(a)(3)	**Compliance dates for starting up new or reconstructed stationary RICE at major sources after August 16, 2004.**	No	N/A
§63. 6595(a)(4)	**Compliance dates for starting up new or reconstructed stationary RICE less than 500hp at major sources of HAP before January 18, 2008.**	No	N/A
§63. 6595(a)(5)	**Compliance dates for starting up new or reconstructed stationary RICE at major sources after August 16, 2004.**	No	N/A
§63. 6595(a)(6)	**Compliance dates for stating up new or reconstructed stationary RICE at area sources before January 18, 2008.**	No	N/A
§63. 6595(a)(7)	**Compliance dates for starting up new or reconstructed stationary RICE at area sources after January 18, 2008.**	No	N/A
§63. 6595(b)	**Area sources that become a major source**	No	N/A
§63. 6600	**What emission limitations and operating limitations must I meet if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?**	No	N/A
§63. 6601	**What emission limitations must I meet if I own or operate a new or reconstructed 4SLB stationary RICE with a site rating of greater than or equal to 250 brake HP and less than or equal to 500 brake HP located at a major source of HAP emissions?**	No	N/A
§63. 6602	**What emission limitations must I meet if I own or operate existing stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions?**	No	N/A
§63. 6603	**What emission limitations and operating limitations must I meet if I own or operate existing stationary RICE located at an area source of HAP emissions?**	Yes; must comply with requirements in Table 2d and 2b that apply. Table 2b has no applicable requirements. Table 2d items 4(a, b, and c) apply.	AR5.1

§63. 6604	**What fuel requirements must I meet if I own or operate an existing stationary CI RICE?**	No; not contractually obligated to be available 15+ hours per calendar year for purposes specified in §63.6640(f)(2)(ii or iii) nor operates for purpose specified in §63.6640(f)(4)(ii).	N/A
§63. 6605	**What are my general requirements for complying with this subpart?** You must be in compliance with the emission limitations, operating limitations, and other requirements in this subpart that apply to you at all times At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.	Yes	N/A
§63. 6610	**By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?**	No – Major sources of HAP only	N/A
§63. 6611	**By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a new or reconstructed 4SLB SI stationary RICE with a site rating of greater than or equal to 250 and less than or equal to 500 brake HP located at a major source of HAP emissions?**	No – Major sources of HAP only	N/A
§63. 6612	**By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate an existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing stationary RICE located at an area source of HAP emissions?**	Yes, must comply with Tables 4 and 5 to Subpart ZZZZ. However, no applicable requirements for existing emergency engines in Tables 4 or 5.	N/A
§63. 6615	**When must I conduct subsequent performance tests?** If you must comply with the emission limitations and operating limitations, you must conduct subsequent performance tests as specified in Table 3 of this subpart.	No – No testing requirements for existing emergency RICE per Table 3	N/A
§63. 6620	**What performance tests and other procedures must I**	No – No	N/A

	use?	performance testing is required for existing emergency RICE < 500 hp at area sources of HAP	
§63. 6625(a)-(g)	**What are my monitoring, installation, collection, operation, and maintenance requirements?**	Yes items (e)(3) and (f) apply.	AR5.2a; AR5.3
§63. 6625(h)	**Must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to this subpart apply.**	Yes	AR5.2b
§63. 6625(i)-(j)	**Oil analysis requirements.**	No	N/A
§63. 6630	**How do I demonstrate initial compliance with the emission limitations and operating limitations?**	No	N/A
§63. 6635	**How do I monitor and collect data to demonstrate continuous compliance?**	No	N/A
§63. 6640(a)-(e)	**How do I demonstrate continuous compliance with the emission limitations and operating limitations?**	Yes, items from Table 2d apply. Permittee must report each instance in which permittee did not meet the requirements in Table 8 to Subpart ZZZZ that apply.	RK3 R9
§63. 6640(f)	**Requirements for emergency stationary RICE In order for the engine to be considered an emergency stationary RICE under this subpart**, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) of this section, is prohibited.	Yes	AR5.2c
§63.6645	**What notifications must I submit and when?**	No	N/A
§63.6650	**What reports must I submit and when?** Emergency stationary RICE that operate or are contractually obligated to be available for more than 15 hours per year for the purposes specified in §63.6640(f)(2)(ii) and (iii) or that operate for the purposes specified in §63.6640(f)(4)(ii)	No	N/A
§63.6655	**What records must I keep?**	Yes. Items a(1), d, e, and f apply.	RK3
§63.6660	**In what form and how long must I keep my records?**	Yes. Items a, b, and c apply.	RK3

§63.6665	**What parts of the General Provisions apply to me?**	Yes, although no ongoing requirements	N/A
§63.6670	**Who implements and enforces this subpart?**	No	N/A
§63.6675	**What definitions apply to this subpart?**	No	N/A

6.5 Accidental Release Prevention Program - Not Applicable

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

- Hazard assessment that details the potential effects of an accidental release, an accident history of the last five years, and an evaluation of worst-case and alternative accidental releases scenarios;
- Prevention program that includes safety precautions and maintenance, monitoring, and employee training measures; and
- Emergency response program that spells out emergency health care, employee training measures and procedures for informing the public and response agencies (e.g., the fire department) should an accident occur.

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

6.6 Prevention of Significant Deterioration (PSD)

Simpson Door is not a PSD major stationary source as defined in 40 CFR § 52.21(b) and is therefore, not subject to the PSD program.

6.7 Federal Compliance Assurance Monitoring (CAM) Rule

Applicability of the CAM Rule under 40 CFR § 64.2(a) is determined on a pollutant by pollutant basis. The CAM Rule applies to a pollutant subject to an emissions limitation or standard when a control device is used to meet the limitation or standard and potential, pre-control device emissions are greater than a major source threshold. The CAM rule exempts backup utility units. Also, the CAM Rule does not apply to emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act, and emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method, as defined in 40 CFR § 64.1.

TABLE 6.5. CAM Applicability

Emission Unit ID#	Control Device	CAM Applicable?
EU1 Hog Fuel Boiler	CAM N/A – Boiler decommissioned	
EU2 Residual Handling	CAM N/A – emitted pollutants not subject to any non-generic emissions limitations or standards	
EU3 Package Boiler	Low-NOx Burners	CAM N/A – Pre-control emissions are less than 100 TPY for all pollutants.
EU4 Dry Kilns	No	CAM N/A – No control device is required to meet emissions limits and standards. Pre-control emissions are less than 100 TPY for all pollutants.
EU5 Surface Coating Line	Paint arrestance filters	CAM N/A – No control device is required to meet emissions limits and standards. Pre-control emissions are less than 100 TPY for all pollutants.
EU6 and EU7 Emergency Engines	No	CAM N/A – No control device is used to meet any emissions limits or standards. Pre-control emissions are less than 100 TPY for all pollutants.
EU8 Glues and Adhesives Line	No	CAM N/A – No control device is used to meet any emissions limits or standards. Pre-control emissions are less than 100 TPY for all pollutants.

6.8 State Greenhouse Gas Reporting Rule

According to WAC 173-441-030(1), the State GHG Reporting Rule applies to industrial facilities that emit at least 10,000 metric tons per year of GHG in terms of carbon dioxide equivalents, including carbon dioxide from biofuels. Simpson Door previously had a documented PTE greater than 10,000 metric tons per year of GHG in terms of carbon dioxide equivalents, but the current PTE is now less than 10,000 tons because of updated boiler emission factors. BecauseSimpson Door has historically had the potential to emit above 10,000 metric tons per year of GHG in terms of carbon dioxide equivalents, the State GHG Reporting Rule may apply if the boiler is tested and new emission factors are established. Requirements of reporting GHG emissions pursuant to Chapter 173-441 WAC are included as condition R8 in the AOP if triggered.

6.9 Federal Mandatory Greenhouse Gas Reporting Rule

The Federal Mandatory Greenhouse Gas Reporting Rules under 40 CFR Part 98 establishes requirements for reporting emissions of GHGs. However, these requirements are not pursuant to either the state or federal Clean Air Acts and, therefore, are not “Applicable Requirements” for purposes of Title V AOPs.

6.10 State Carbon Dioxide Mitigation Program

Carbon dioxide mitigation per Chapters 463-80 and 173-485 WAC are requirements for thermal electric generating facilities and, therefore, does not apply to Simpson Door.

6.11 Control Equipment Monitoring

Some pollution control equipment has associated periodic monitoring to assure compliance. Most monitoring at the Facility is qualitative (i.e. checking for fugitives and particulate build up) but the baghouses associated with EU2 have prescribed operating ranges of 0.1" water column – 4" water column. The prescribed operating ranges were developed during the 2016 AOP renewal using the baghouse manufacturer's recommendations. The facility has not had issues with particulate emissions or opacity related to baghouse operation.

7.0 PERMIT CONDITIONS

7.1 Permit Administration

Permit administrative conditions (A1-A14) include conditions specifying how the AOP is managed according to the State AOP program under Chapter 173-401 WAC and conditions having implications on assuring compliance with all other conditions in the AOP. Many of the permit administrative conditions are "standard terms and conditions" and required to be in the AOP per either Chapter 173-401 WAC or per federal requirements for AOPs.

The origin of each permit administrative condition is stated at the end of each condition. Authority to include permit administrative conditions comes from primarily from WAC 173-401-600(1)(b), which specifies AOPs contain requirements from the Washington Clean Air Act (Chapter 70A.15 RCW) and rules implementing that chapter (Washington's AOP program is pursuant to RCW 70A.15.2270, which is under the Washington Clean Air Act).

Permit administrative conditions specify terms of the AOP such as the permit duration, expiration, renewal and revision requirements. They also explain the "Permit Shield," extent of AOP enforceability and how the AOP can be revoked or re-opened for cause. They are essential to the proper functioning of the AOP under the State of Washington Program. Because permit administrative conditions do not include any applicable emissions limitations or operational standards, monitoring is not applicable. However, general recordkeeping and reporting requirements apply. Also, compliance with permit administrative conditions must be certified annually.

7.2 General Terms and Conditions

General terms and conditions (G1 – G23) cover general compliance and permitting

requirements. These conditions are categorized as General Terms and Conditions in the permit because they either have broad implications on multiple conditions in the AOP, or are entire programs that are applicable if triggered, such as the Stratospheric Ozone Protection program. Authority for each condition varies depending on whether the applicable requirement originated from a state or federal regulation. Several general terms or conditions are discussed in detail below.

7.3 Prohibited Activities

Prohibited activities conditions (PA1-PA7) cover general prohibitions. These conditions are categorized as Prohibited Activities in the permit because they identify broad prohibitions that apply to Title V facilities at all times, such as prohibition of concealment or masking of emissions. There are no specific monitoring requirements for these prohibited activities because prohibitions generally do not involve applicable emission limits or operational standards for which testing and/or monitoring are needed. However, compliance with the prohibited activities conditions must be certified annually. Authority for each condition varies depending on whether the prohibited activity originated from a state or federal regulation.

7.4 Applicable Requirements

Applicable requirements (AR1-AR9) include all emissions limits and standards, work practice standards and operating requirements for emissions units that apply at the Simpson Door Facility and are grouped as follows:

- AR1 (AR1.1-1.11) covers general applicable requirements that apply facility-wide to all emissions units at the Simpson Door Facility.
- AR2 (AR2.1-2.3) includes requirements that apply specifically to The Wood Residuals Transport Systems (EU2).
- AR3 (AR3.1-3.8) includes requirements that apply specifically to the Package Boiler (EU3).
- AR4 (AR4.1-4.3) includes requirements that apply specifically to the Surface Coating Lines (EU5).
- AR5 (AR5.1-5.3) includes requirements that apply specifically to the Emergency Engines (EU6 and EU7).
- AR6 (AR6.1) includes requirements that apply specifically to the Glues and Adhesives Line (EU8).

7.5 Monitoring Terms and Conditions

Applicable monitoring terms and conditions (M1 – M10) include all monitoring required under the permit. The overarching requirement for Title V permits is that they contain monitoring sufficient for assuring compliance. This is codified in the Washington Title V rule under WAC 173-401-630(1) which states:

Consistent with WAC 173-401-615, all chapter 401 permits shall contain compliance

certification, testing, monitoring, reporting, and recordkeeping requirements sufficient to assure compliance with the terms and conditions of the permit.

To meet this requirement for Title V permits, monitoring provisions may be added to a permit when either the applicable limit or standard does not specify monitoring, or when the specified monitoring is not sufficient to assure compliance. Therefore, there are three different categories of monitoring included in a Title V permit, each under a specific authority:

- **Applicable Monitoring.** All monitoring specified by an applicable requirement needs to be included in the permit per WAC 173-401-615(1)(a). When this is the case, WAC 173-401-615(1)(a) is cited as the authority for including the monitoring and the underlying applicable requirement is cited as the "Origin" of the monitoring.
- **Gap-filling Monitoring.** When an applicable requirement (emissions limit, standard or work practice standard) does not specify monitoring, monitoring sufficient to assure compliance must be added to the permit. This category of monitoring is referred to by EPA as "gap-filling monitoring." The authority to include gap-filling monitoring comes from WAC 173-401-615(1)(b)
- **Sufficiency Monitoring.** When monitoring is specified by an applicable requirement but it does not meet the Title V requirement of assuring compliance with the applicable requirement, the applicable monitoring needs to be augmented. This category of monitoring is referred to by EPA as "Sufficiency Monitoring." The authority to include sufficiency monitoring provisions to a permit comes from WAC 173-401-630(1). The origin for sufficiency monitoring remains the underlying applicable requirement itself.

7.6 General Recordkeeping Requirements

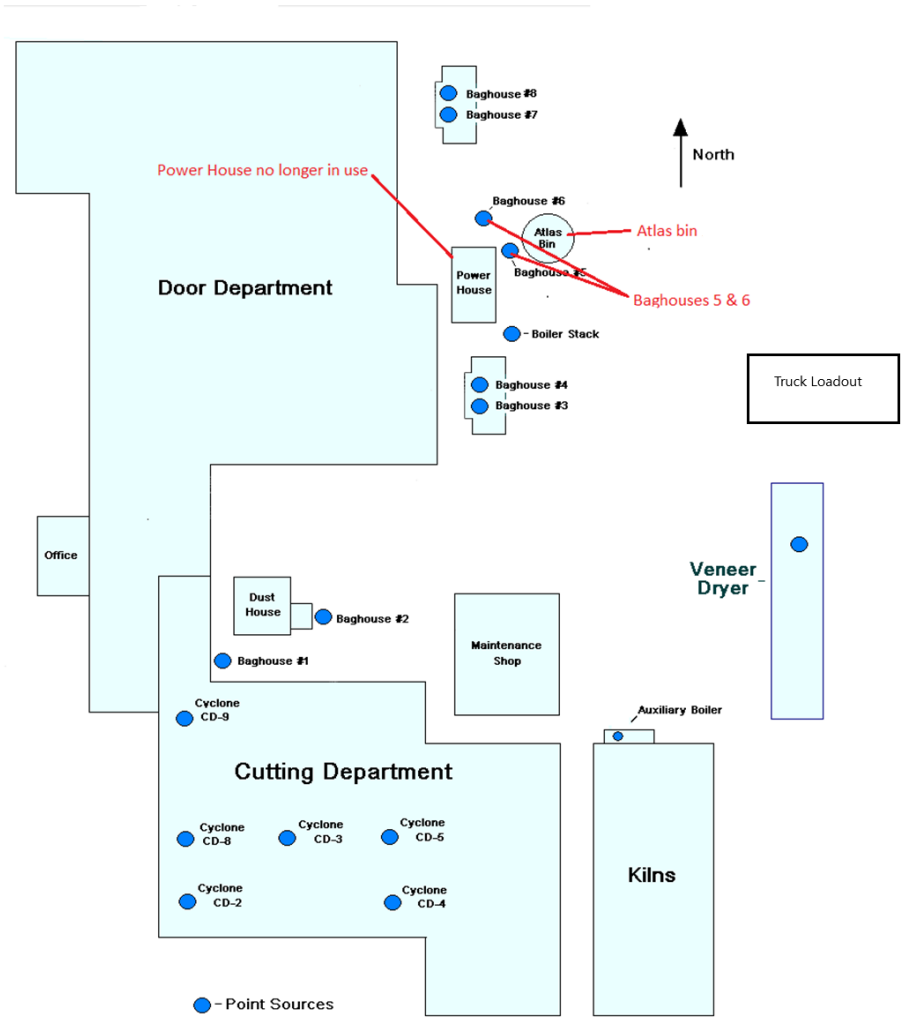
Applicable recordkeeping terms and conditions (RK1 – RK12) include all required recordkeeping requirements for Title V AOPs as required under WAC 173-401-615(2). Origin and authority are stated at the end of each condition.

7.7 Reporting

Applicable reporting terms and conditions (R1 – R14) include all required reporting requirements for Title V AOPs as required under WAC 173-401-615(32). Origin and authority are stated at the end of each condition.

ATTACHMENT 1: Facility Map

Figure 1. Facility Overview (not to scale)



ATTACHMENT 2: Compliance History

DATE	NOV #	REGULATION OR CONDITION	DESCRIPTION	RESOLUTION
04/11/2006	2376	- RCW 70.94.161(9) - AOP03-281 Condition 8.9	Failure to notify ORCAA of source test on boiler. ORCAA personnel were not afforded an opportunity to observe the test, causing substantial interference with ORCAA's ability to make a compliance determination, constituting an HPV under general HPV criteria #7.	$2,000 penalty - paid
07/31/2013	3264	- RCW 70.94.161(9)(a) - 09AOP717 Condition 9.4	Failure to submit semi-annual compliance certification by the scheduled due date.	Penalty suspended
09/03/15	3381	- WAC 173-401-615 - 09AOP717 Condition 7.6	Failure to monitor and keep records of air pollution control equipment.	$2,000 penalty - paid