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*Serving Clallam,  
Grays Harbor, Jefferson,  
Mason, Pacific, and  
Thurston counties.*

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# Air Operating Permit (AOP)

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Simpson Door  
Company,  
McCleary Door Plant

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AOP – Renewal  
22AOP1559  
1/24/2023

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# AIR OPERATING PERMIT

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

PERMIT NO: 22AOP1559  
ISSUANCE DATE: January 24, 2023  
EXPIRATION DATE: January 24, 2028  
PERMITTEE & MAILING ADDRESS: Simpson Door Company  
400 Simpson Avenue  
McCleary, WA 98557

FACILITY LOCATION: Simpson Door Company  
400 Simpson Avenue  
McCleary, WA 98557

FACILITY DESCRIPTION: Wood Door Manufacturing Plant

ORCAA File #: 1114

PRIMARY SIC: 2431

NAICS: 321911

PREPARED BY: *A. Maty* 1/24/2023

REVIEWED BY: *Mark V Goodin* 1/24/2023

APPROVED BY: *Sb C Jtn* 1/24/2023



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## I. ABBREVIATIONS

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

A#	Refers to a specific administrative term or condition numbered “#”
Administrator	EPA Region X Administrator
AOP	Air Operating Permit
AP-42	EPA Compilation of Emission Factors, AP-42, Fifth Edition, Volume I
AR#	Refers to a specific applicable requirement numbered “#”
ASTM	American Society for Testing and Materials
CFR	Code of Federal Regulations
CO	Carbon monoxide
CO <sub>2</sub>	Carbon Dioxide
Ecology	Washington State Department of Ecology
EPA	U.S. Environmental Protection Agency
FCAA	Federal Clean Air Act
EU#	Refers to a specific emissions unit numbered “#”
G#	Refers to a specific general term or condition numbered “#”
grain/dscf	Concentration in terms of grains per dry standard cubic feet
HAP	Hazardous Air Pollutant
hp	Horsepower
M#	Refers to a specific monitoring term or condition numbered “#”
MACT	Maximum Achievable Control Technology
MMBtu/hr	Million British Thermal Units per hour
NESHAP	National Emission Standards for Hazardous Air Pollutants
NAICS	North American Industry Classification System
NCASI	The National Council for Air and Stream Improvement, Inc. (NCASI)
NOC	Notice of Construction
NO <sub>x</sub>	Oxides of Nitrogen
NSPS	New Source Performance Standards
NSR	New Source Review
O <sub>2</sub>	Oxygen
O&M	Operations and Maintenance Plan
PA#	Refers to a specific prohibited activity term or provision numbered “#”
PM	Particulate matter air pollution
PM <sub>10</sub>	Particulate matter with aerodynamic diameter less than 10 microns
PM <sub>2.5</sub>	Particulate matter with aerodynamic diameter less than 2.5 microns
ppm	Parts per million by volume (assumed standard and dry)
PSD	Prevention of Signification Deterioration
PW#	Refers to a plant-wide applicable requirement numbered “#”
RACT	Reasonably Available Control Technology
R#	Refers to a specific reporting term or condition numbered “#”
RCW	Revised Code of Washington
REQ	Requirement
RICE	Reciprocating Internal Combustion Engine
RK#	Refers to a specific record keeping term or condition numbered “#”
S#	Refers to a specific permit shield term or provision numbered “#”

SIC	Standard Industrial Classification
SO <sub>2</sub>	Sulfur dioxide
TSP	Total Suspended Particulate
TAP	Toxic Air Pollutant as defined in Chapter 173-460 WAC
TPY	Tons per year
VOC	Volatile Organic Compounds
WAC	Washington Administrative Code
§	Refers to a section out of the Code of Federal Regulations

*[END OF SECTION]*

## II. REGULATORY BASIS

Pursuant to Chapter 173-401 Washington Administrative Code (WAC), the “Permittee”, Simpson Door Company, McCleary Door Plant, Inc. (Simpson), is authorized to operate their wood door manufacturing facility (Facility) located at 400 Simpson Avenue in McCleary, Washington, in accordance with the terms and conditions listed in this permit.

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

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

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

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

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

*[END OF SECTION]*

### III. EMISSION UNIT (EU) IDENTIFICATION

The following emissions units are covered under this permit.

**TABLE 1: Emissions Units Covered Under Permit**

Emission Unit ID#	Description	Exhaust Point ID#	Control Equipment
EU1	VACANT	N/A	N/A
EU2	Residuals Transport Systems: Particulate emissions from all cyclones serving mill operations such as wood cutting, slicing, planing, sanding, and milling operations.	C-2(planer)	None – Exhausts to atmosphere
		C-3(BEG)	None – Exhausts to atmosphere
		C-4(hog)	None – Exhausts to atmosphere
		C-5(cutting)	None – Exhausts to atmosphere
		C-6(dusthouse)	Baghouse #2
		C-7(sander)	Baghouse #1
		C-8(Stickers)	None – Exhausts to atmosphere
		C-9(CEG)	None – Exhausts to atmosphere
		C-10(Door Plant/Finishing)	Baghouse #8
		C-11(Door Plant/Finishing)	Baghouse #7
		C-12(Door Plant)	Baghouse #4
		C-13(Door Plant)	Baghouse #3
		C-14(Truck Delivery System)	Baghouse #5
C-15(Atlas Baghouse)	Baghouse #6		
EU3	Package Boiler: Gas only 14.7 MMBtu/hr heat input rate 12,100 lbs/hr of steam at 200 psi.	#03 Package Boiler Stack	Low NOx burner design
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.	Kiln vents	None
EU5	Surface Coating Line: EIBF1410 Spray booth (16'2" W x 20' L x 12' H) Filters with overall arrest efficiency of 98%+ Vertical exhaust at height at least 6' above highest peak of building Design exhaust air flow of 14,000 acfm	Stack	Paint arrestor filters
EU6	Emergency Engine: Pumphouse diesel engine – 1,500 gpm Rated at 170 bhp	Vents	None
EU7	Emergency Engine: Powerhouse diesel engine Rated at 225 kW (302 bhp)	Vents	None
EU8	Glues and adhesives line – glue spreader rolls used to bond veneers to boards with heated adhesives	Stack	None

**Table Notes:**

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



*[END OF SECTION]*

## IV. PERMIT ADMINISTRATION (A)

**A1. Permit Duration.** This permit is issued for a fixed term of 5 years from date of issuance.

*[Origin: WAC 173-401-610]*

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

**A2. Federally Enforceable Requirements.**

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

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

*[Origin: WAC 173-401-625]*

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

**A3. Standard Conditions:**

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

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

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

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

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

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

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

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

*[Origin: Listed per sub-condition]*

*[Authority: WAC 173-401-620(2)]*

**A4. Permit Renewal Application.** The Permittee shall submit a complete renewal application to ORCAA at least 12 months, but no more than 18 months, prior to the expiration date of this permit.

*[Origin: WAC 173-401-710(1)]*

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

**A5. Permit Expiration – Application Shield.** Permit expiration terminates the Permittee’s right to operate unless a timely and complete renewal application has been submitted consistent with condition A4. All terms and conditions of the permit shall remain in effect after the permit itself expires if a timely and complete permit application has been submitted.

*[Origin: WAC 173-401-710(3)]*

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

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

*[Origin: WAC 173-401-710(4)]*

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

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

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

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

*[Origin: WAC 173-401-730]*

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

**A8. Changes not Requiring Permit Revision/Off Permit Changes.** The Permittee may make the changes described in WAC 173-401-722 and WAC 173-401-724 without revising this permit, provided the changes satisfy the criteria set forth in those sections, including the requirements to notify ORCAA and EPA.

*[Origin: WAC 173-401-722; WAC 173-401-724]*

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

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

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

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

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

Application and approval of administrative permit amendment applications shall conform to the procedures in WAC 173-401-720.

*[Origin: WAC 173-401-720]*

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

**A10. Permit Modifications.** Permit revisions which cannot be accomplished using the provisions for administrative permit amendments shall be applied for and approved as a permit modification according to WAC 173-401-725.

*[Origin: WAC 173-401-725]*

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

**A11. Credible Evidence.** For purposes of certifying compliance or establishing whether or not the Permittee has violated or is in violation of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with the requirements if the appropriate performance or compliance test or procedure had been performed.

*[Origin: 40 CFR § 51.212; 40 CFR § 52.12; 40 CFR § 52.33; 40 CFR § 61.12]*

*[Authority: WAC 173-401-600(1)(a)]*

**A12. Emergency Provision:**

- a) **Definition.** An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God and force majeure, which requires immediate corrective action to restore normal operation, and causes the source to exceed a technology-based emission limitation under the AOP, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- b) **Effect of an emergency.** An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations.
- c) **Reporting.** To qualify as an emergency, the Permittee must report the emergency to ORCAA according to condition R4.
- d) **Criteria.** The affirmative defense of emergency must be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that demonstrating to ORCAA that:
  - i) An emergency occurred and the Permittee can identify the cause(s) of the emergency;
  - ii) The Facility was at the time being properly operated;

- iii) During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the AOP; and
- iv) The notice submitted to ORCAA must contain descriptions of:
  - (1) The emergency;
  - (2) Steps taken to mitigate emissions;
  - (3) Corrective actions taken;
  - (4) The probable cause; and,
  - (5) Preventive measures taken.
- e) **Burden of proof.** In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- f) **Relationship to other rules.** This provision is in addition to any emergency or upset provision contained in any applicable requirement.

*[Origin: WAC 173-401-615; WAC 173-401-645; ORCAA Rule 8.7 (local only)]*

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

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

- a) **Effect of "Unavoidable Excess Emissions" Determination.** Excess emissions determined to be unavoidable under the procedures and criteria in this condition shall be excused and not subject to penalty.
- b) **Burden of Proof.** To qualify for relief, the Permittee must prove to ORCAA in an enforcement action, the excess emissions were unavoidable. This demonstration must be a condition to obtaining relief (from penalty).
- c) **Criteria.** Excess emissions due to an upset or malfunction will be considered unavoidable provided the Permittee:
  - i) Reports as required under condition R4.
  - ii) Upon request by ORCAA, submits a full written report including the known causes, the corrective actions taken, and the preventive measures to be taken to minimize or eliminate the chance of recurrence.
  - iii) For excess emissions due to startup or shutdown conditions, the Permittee adequately demonstrates the excess emissions could not have been prevented through careful planning and design and, if a bypass of control equipment occurs, such bypass was necessary to prevent loss of life, personal injury, or severe property damage.
  - iv) For excess emissions due to scheduled maintenance, the Permittee adequately demonstrates the excess emissions could not have been avoided through reasonable design, better scheduling for maintenance or through better operation and maintenance practices.
  - v) For excess emissions due to a malfunction or upset, the Permittee adequately demonstrates that:

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

*[Origin: WAC 173-400-107; ORCAA Rule 8.7 (local only)]*

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

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

- a) Effect of “Unavoidable Excess Emissions” Determination.** Excess emissions determined to be unavoidable under the procedures and criteria in this section are:
  - i)** A violation subject to WAC 173-400-230 (3), (4), and (6); but
  - ii)** Not subject to civil penalty under WAC 173-400-230(2).
- b) Determination.** ORCAA determines whether excess emissions are unavoidable based on the information supplied by the Permittee and the criteria in subsection (g) of this condition.
- c) Burden of Proof.** To qualify for relief, the Permittee must prove to ORCAA in an enforcement action that excess emissions were unavoidable. This demonstration must be a condition to obtaining relief under (a)(ii) of this condition.
- d) Limitation.** This condition (condition A14) does not apply to an exceedance of an emission standard in 40 CFR Parts 60, 61, 62, 63, or 72, or ORCAA’s adoption by reference of these federal standards.
- e) Startups and Shutdowns.** Excess emissions that occur due to an upset or malfunction during a startup or shutdown event are treated as an upset or malfunction under subsection (g) of this section.
- f) Criteria.** Excess emissions due to an upset or malfunction will be considered unavoidable provided the Permittee reports as required under R4 and adequately demonstrates to ORCAA that:
  - i)** The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition;
  - ii)** The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance;
  - iii)** The Permittee took immediate and appropriate corrective action in a manner consistent with safety and good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, when the Permittee knew or should have known that an emission

- standard or other permit condition was being exceeded (Actions taken could include slowing or shutting down the emission unit as necessary to minimize emissions);
- iv) If the emitting equipment could not be shutdown during the malfunction or upset to prevent the loss of life, prevent personal injury or severe property damage, or to minimize overall emissions, repairs were made in an expeditious fashion;
  - v) All emission monitoring systems and pollution control systems were kept operating to the extent possible unless their shutdown was necessary to prevent loss of life, personal injury, or severe property damage;
  - vi) The amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent possible; and
  - vii) All practicable steps were taken to minimize the impact of the excess emissions on ambient air quality.
- g) Required information.** In addition to the information required under condition R4, the excess emissions report to ORCAA must include:
- i) Properly signed contemporaneous records or other relevant evidence documenting the Permittee's actions in response to the excess emissions event;
  - ii) Information on whether installed emission monitoring and pollution control systems were operating at the time of the exceedance. If either or both systems were not operating, information on the cause and duration of the outage; and
  - iii) Any additional information requested by ORCAA to support the claim the excess emissions were unavoidable.

*[Origin: WAC 173-400-108; WAC 173-400-109; ORCAA Rule 8.7 (local only)]*

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

*[END OF SECTION]*



## V. GENERAL TERMS AND CONDITIONS (G)

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

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

*[Origin: ORCAA Rule 3.2 and as noted per sub-condition above]*

*[Authority: WAC 173-401-620(2)]*

**G2. Duty to Supplement or Correct Application.** The Permittee, upon becoming aware that any relevant facts were omitted, or incorrect information was submitted in the permit application, shall promptly submit such facts or corrected information.

*[Origin: WAC 173-401-500(6)]*

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

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

confidential prior to submittal to ORCAA. In addition, all confidential information must be submitted according to ORCAA's Public Records and Confidentiality Procedures.

*[Origin: WAC 173-401-500(5); WAC 173-401-630(1); ORCAA Rule 1.6 (local only)]*

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

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

*[Origin: WAC 173-401-620(2)(e)]*

*[Authority: WAC 173-401-620(2)]*

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

*[Origin: WAC 173-401-520; WAC 173-401-615(3)(a); WAC 173-401-630(1)]*

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

**G6. Duty to comply.** The Permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of Chapter 70A.15 RCW and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.

*[Origin: WAC 173-401-620(2)(a)]*

*[Authority: WAC 173-401-620(2)]*

**G7. Compliance Maintenance.** The Permittee must maintain compliance with all applicable requirements with which the source was in compliance as of the date of permit issuance. The Permittee must meet on a timely basis any applicable requirements that become effective during the permit term.

*[Origin: WAC 173-401-510(2)(h)(iii); WAC 173-401-630(3)]*

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

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

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

*[Origin: WAC 173-401-630(2)]*

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

**G9. Access for Inspection.** No person shall refuse entry or access to an ORCAA representative who requests entry for the purpose of inspection, and who presents appropriate credentials; nor shall any person obstruct, hamper or interfere with any such inspection.

*[Origin: ORCAA Rule 1.5(e) (local only); ORCAA Rule 7.1 (local only)]*

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

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

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

*[Origin: WAC 173-401-530]*

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

**G11. New Source Review.** Prior to commencing any new installation, replacement, modification or alteration of any stationary source, emission unit, area source or fugitive

source, the Permittee must secure all necessary approvals under Rule 6.1 of ORCAA Regulations.

*[Origin: WAC 173-400-110; WAC 173-460-040; ORCAA Rule 6.1 (local only); ORCAA Rule 8.6(a) (local only)]*

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

**G12. Replacement or Substantial Alteration of Existing Control Equipment.** Notification, review and approval by ORCAA according to Rule 6.1 of ORCAA's regulations is required prior to replacing or substantially altering any approved air pollution control technology or device.

*[Origin: WAC 173-400-114; ORCAA Rule 6.1.10 (local only)]*

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

**G13. Temporary Sources.** The Permittee may operate portable air contaminant sources at temporary locations within the Facility subject to this permit provided the Permittee has complied with the requirements for temporary portable sources under ORCAA Rule 6.1.1.

*[Origin: WAC 173-401-635; ORCAA 6.1.1 (local only)]*

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

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

*[Origin: WAC 173-400-117 (state only); WAC 173-400-700, -710, -720, -730, -740, -750 (state only)]*

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

**G15. Demolition and Asbestos Projects.** The Permittee must comply with all notification and approval requirements in Rule 6.3 of ORCAA Regulations prior to commencing any asbestos, renovation, or demolition project at the Facility as defined in ORCAA Rule 6.3.1. The Permittee must conduct all renovation, demolition and asbestos projects in accordance with applicable asbestos control standards and requirements in ORCAA Rule 6.3.

*[Origin: ORCAA Rule 6.3 (local only)]*

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

**G16. Demolition and Renovation Projects.** The Permittee must notify ORCAA prior to commencing any renovation or demolition activities at the Facility as defined in 40 CFR §

61.141. The Permittee must conduct all renovation, demolition and asbestos projects in accordance with applicable asbestos control standards and requirements in Subpart M of 40 CFR Part 61.

*[Origin: 40 CFR Part 61, Subpart M]*

*[Authority: WAC 173-401-600(1)(a)]*

**G17. Protection of Stratospheric Ozone.** The Permittee must comply with the standards for recycling and emissions reduction as provided in 40 CFR Part 82, Subparts B and F.

*[Origin: 40 CFR Part 82, Subparts B & F]*

*[Authority: WAC 173-401-600(1)(a)]*

**G18. Reasonably Available Control Technology (RACT):**

- a) **General Standards for Maximum Emissions.** All emissions units are required to use reasonably available control technology (RACT) which may be determined for some sources or source categories to be more stringent than the applicable emission limitations of any chapter of Title 173 WAC. *[Origin: WAC 173-400-040(1)(c) (state/local only)]*
- b) **General Standards for Maximum Particulate Matter.** All emissions units are required to use reasonably available control technology (RACT) which may be determined for some sources or source categories to be more stringent than the applicable emission limitations of ORCAA Regulations. *[Origin: ORCAA Rule 8.3 (local only)]*
- c) Emission standards and other requirements contained in rules or regulatory orders in effect at the time of this permit issuance shall be considered RACT for the purposes of issuing this permit. *[Origin: WAC 173-401-605(3)]*

*[Origin: Listed by sub-condition]*

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

**G19. Outdoor Burning.** The requirements under ORCAA Rule 6.2 and Chapter 173-425 WAC apply to all outdoor burning conducted at the Facility.

*[Origin: Chapter 173-425 WAC; ORCAA Rule 6.2 (local only)]*

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

**G20. Wood Heating.** Any wood combustion device used for space heating must comply with the requirements in ORCAA Rule 8.1 and Chapter 173-433 WAC.

*[Origin: Chapter 173-433 WAC; ORCAA Rule 8.1 (local only)]*

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

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

- a) The used oil meets the standards in ORCAA Rule 8.9. *[Origin: ORCAA Rule 8.9 (local only)]*
- b) If burned in an emissions unit, the Permittee first secures approval of the fuel change according to condition G11. *[Origin: ORCAA Rule 6.1 (local only)]*

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

**G22. Gasoline Dispensing Facilities.** Any gasoline dispensing facility located within the property boundary of the major source regulated by this AOP must comply with the requirements in ORCAA Rule 8.12 and WAC 173-491-040.

*[Origin: WAC 173-491-040 (state/local only); ORCAA Rule 8.12 (local only)]*  
*[Authority: WAC 173-401-600(1)(b)]*

**G23. Greenhouse Gas Reporting Fee.** The Permittee must pay a greenhouse gas (GHG) reporting fee for each year they are required to submit a GHG report to Ecology. Fees will be paid according to Ecology's fee schedule. Fees must be paid within sixty days of receipt of Ecology's billing statement.

*[WAC 173-441-110 (state only)]*  
*[Authority: WAC 173-401-600(1)(b)]*

*[END OF SECTION]*

## **VI. PROHIBITED ACTIVITIES (PA)**

**PA1. Emissions Detrimental to Persons or Property Prohibited.** No person shall cause or allow the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business.

*[Origin: WAC 173-400-040(1)(a) (state/local only); WAC 173-400-040(6) (state/local only); ORCAA Rule 7.6 (local only)]*  
*[Authority: WAC 173-401-600(1)(b)]*

**PA2. Unreasonable Odors Prohibited.** No person shall cause or allow the emission or generation of any odor from any source, that unreasonably interferes with another person's use and enjoyment of their property.

*[Origin: ORCAA Rule 8.5(c) (local only)]*  
*[Authority: WAC 173-401-600(1)(b)]*

**PA3. Unreasonable Fallout Prohibited.** No person shall cause or permit the emission of particulate matter from any source to be deposited beyond the property under direct control of the owner(s) or operator(s) of the source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited.

*[Origin: WAC 173-400-040(1)(a); WAC 173-400-040(3); ORCAA Rule 8.3(e) (local only)]*  
*[Authority: WAC 173-401-600(1)(b)]*

**PA4. Concealment and Masking Prohibited:**

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

*[Origin: WAC 173-400-040(1)(a) (state/local only); WAC 173-400-040(8) (state/local only); ORCAA Rule 7.5 (local only)]*

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

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

- a) The use of diluents to achieve compliance with a relevant standard based on the concentration of a pollutant in the effluent discharged to the atmosphere; and,
- b) The use of gaseous diluents to achieve compliance with a relevant standard for visible emissions.

*[Origin: 40 CFR § 60.12; 40 CFR § 63.4(b)]*

*[Authority: WAC 173-401-600(1)(a)]*

**PA6. Fragmentation Prohibited.** Fragmentation which divides ownership of an operation, within the same facility among various owners where there is no real change in control, will not affect applicability. The owner and operator must not use fragmentation or phasing of reconstruction activities (i.e., intentionally dividing reconstruction into multiple parts for purposes of avoiding new source requirements) to avoid becoming subject to new source requirements.

*[Origin: 40 CFR § 63.4(c)]*

*[Authority: WAC 173-401-600(1)(a)]*

**PA7. False or Misleading Statements Prohibited.** No person shall willfully make a false or misleading statement to ORCAA as to any matter within the jurisdiction of ORCAA. No person shall make any false material statement, representation or certification in any form, notice or report required under chapter 70A.15 or 70.120 RCW, or any ordinance, resolution, regulation, permit or order in force pursuant thereto.

*[Origin: WAC 173-400-105(6) (state/local only); ORCAA Rule 7.2 (local only)]*

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

*[END OF SECTION]*



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

AR#	Requirements	Applicability	Monitoring
<b>General Standards and Prohibitions Applying Facility-wide</b>			
1.1	<p>a) <b>Opacity Standard (State).</b> No person shall cause or allow the emission for more than three minutes, in any one hour, of an air contaminant from any emissions unit which at the emission point, or within a reasonable distance of the emission point, exceeds twenty percent opacity as determined by ecology method 9A.</p> <p><b>Reference Test Method:</b> Ecology Method 9A.</p> <p><i>[Origin: WAC 173-400-040(1)(a) (state/local only); WAC 173-400-040 (2) (state/local only)]</i></p> <p><i>[Authority: WAC 173-401-600(1)(b)]</i></p>	Applies Facility-wide to emissions from vents, stacks and ducts.	M1 M2
1.2	<p><b>Opacity Standard (ORCAA).</b></p> <p>a) In equipment or facilities, including boilers using hogged fuel, regardless of their date of installation, no person shall cause or allow the emission to the outdoor atmosphere, for more than three (3) minutes in any one hour, of a gas stream containing air contaminants which are greater than 20% opacity.</p> <p>b) Observations shall be made by trained and certified observers or by LIDAR instrumentation.</p> <p><b>Reference Test Method:</b> Ecology Method 9A.</p> <p><i>[Origin: ORCAA Rule 8.2 (local only)]</i></p> <p><i>[Authority: WAC 173-401-600(1)(b)]</i></p>	Applies Facility-wide to emissions from vents, stacks and ducts.	M1 M2
1.3	<p><b>Fugitive Emissions Control.</b> The owner or operator of any emission unit engaging in materials handling, construction, demolition or any other operation which is a source of fugitive emissions shall take reasonable precautions to prevent release of air contaminants from the operation.</p> <p><i>[Origin: WAC 173-400-040(1)(a); WAC 173-400-040(4)(a)]</i></p> <p><i>[Authority: WAC 173-401-600(1)(b)]</i></p>	Applies Facility-wide	M4
1.4	<p><b>Fugitive Dust Control.</b> The owner or operator of a source or activity, that generates fugitive dust, must take reasonable precautions to prevent fugitive dust from becoming airborne and must maintain and operate the source to minimize emissions.</p> <p><i>[Origin: WAC 173-400-040(1)(a) (state/local only); WAC 173-400-040(9)(a) (state/local only); ORCAA Rule 8.3(c)-(d) (local only)]</i></p> <p><i>[Authority: WAC 173-401-600(1)(b)]</i></p>	Applies Facility-wide	M4

AR#	Requirements	Applicability	Monitoring
1.5	<p><b>Odor Control (State).</b> Any person who shall cause or allow the generation of any odor from any source or activity which may unreasonably interfere with any other property owner's use and enjoyment of her or his property must use recognized good practice and procedures to reduce these odors to a reasonable minimum.</p> <p><i>[Origin: WAC 173-400-040(1)(a) (state/local only); WAC 173-400-040(5) (state/local only)]</i>  <i>[Authority: WAC 173-401-600(1)(b)]</i></p>	Applies Facility-wide	M3 M4
1.6	<p><b>Odor Control (ORCAA).</b> Reasonably available control technology (RACT) shall be installed and operated to mitigate odor-bearing gases emitted into the atmosphere to a minimum, or, so as not to create air pollution.</p> <p><i>[Origin: ORCAA Rule 8.5(a) (local only)]</i>  <i>[Authority: WAC 173-401-600(1)(b)]</i></p>	Applies Facility-wide	M3 M4
1.7	<p><b>Sulfur dioxide.</b> No person shall cause or allow the emission of a gas containing sulfur dioxide from any emissions unit in excess of one thousand ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based on the average of any period of sixty consecutive minutes.</p> <p><b>Reference Test Methods:</b> 40 CFR Part 60 Appendix A.</p> <p><i>[Origin: WAC 173-400-040(1)(a); WAC 173-400-040(7)]</i>  <i>[Authority: WAC 173-401-600(1)(b); WAC 173-401-605(1)]</i></p>	Applies Facility-wide	M5 M8
1.8	<p><b>Particulate Standards for Combustion Units.</b> No person shall cause or allow emissions of particulate matter in excess of 0.23 gram per dry cubic meter at standard conditions (0.1 grain/dscf), except, for an emissions unit combusting waste wood for the production of steam. No person shall allow the emission of particulate matter in excess of 0.46 gram per dry cubic meter at standard conditions (0.2 grain/dscf), as measured by 40 CFR Part 60, Appendix A, Test Method 5 (in effect on the date in WAC 173-400-025) or approved procedures in <i>Source Test Manual - Procedures for Compliance Testing</i>, state of Washington, department of ecology, as of September 20, 2004, on file at ecology.</p> <p><b>Reference Test Methods:</b> 40 CFR Part 60, Appendix A, Test Method 5 (in effect on the date in WAC 173-400-025) or approved procedures in <i>Source Test Manual - Procedures for Compliance Testing</i>, state of Washington, department of ecology, as of September 20, 2004, on file at ecology.</p> <p><i>[Origin: WAC 173-400-050(1) (state/local only)]</i>  <i>[Authority: WAC 173-401-600(1)(b); WAC 173-401-605(1)]</i></p>	Applies Facility-wide to combustion emissions units	M8 M9
1.9	<b>ORCAA Particulate Standards.</b>		M8 M9

AR#	Requirements	Applicability	Monitoring
	<p>No person shall cause or allow the emission of particulate matter to the outdoor atmosphere from any single source in excess of 0.10 grains per standard cubic foot of gas (calculated at 7% oxygen). Particulate test procedures, on file at the Authority, will be used to determine compliance. The Authority includes the Method 5 back-half condensable particulate matter for determining compliance with particulate matter standards.</p> <p><b>Reference Test Methods:</b> Particulate test procedures, on file at the Authority, will be used to determine compliance. The Authority includes the Method 5 (EPA Reference Method 5 from 40 CFR Part 60, Appendix A) back-half condensable particulate matter for determining compliance with particulate matter standards.</p> <p><i>[Origin: ORCAA Rule 8.3(a)&amp;(b) (local only)]</i>  <i>[Authority: WAC 173-401-600(1)(b); WAC 173-401-605(1)]</i></p>	<p>Applies Facility-wide to all emissions units</p>	
1.10	<p><b>Particulate Standards for Process Units.</b> No person shall cause or allow the emission of particulate material from any general process operation in excess of 0.23 grams per dry cubic meter at standard conditions (0.1 grain/dscf) of exhaust gas.</p> <p><b>Reference Test Methods:</b> Test methods from 40 CFR Parts 51, 60, 61, or 63 (in effect on the date in WAC 173-400-025) and any other approved test procedures in ecology's "Source Test Manual - Procedures For Compliance Testing" as of September 20, 2004, must be used to determine compliance.</p> <p><i>[Origin: WAC 173-400-040(1)(a); WAC 173-400-060 (state/local only)]</i>  <i>[Authority: WAC 173-401-600(1)(b); WAC 173-401-605(1)]</i></p>	<p>Applies Facility-wide to all process emissions units</p>	<p>M8 M9</p>
1.11	<p><b>Maintenance and Repair of Process and Air Pollution Control Equipment.</b> All air contaminant sources are required to keep any process and air pollution control equipment in good operating condition and repair</p> <p><i>[Origin: ORCAA Rule 8.8 (local only)]</i>  <i>[Authority: WAC 173-401-600(1)(b)]</i></p>	<p>Applies to any emissions unit with connected air pollution control equipment</p>	<p>M6</p>
<b>Wood Residuals Transport Systems (EU2)</b>			
2.1	<p><b>Atlas Bin:</b> The Atlas Bin (Part of EU2) must vent through a fabric filter baghouse at all times when material is flowing to the bin and during truck loading.</p> <p><i>[Origin: 16NOC1154, condition 2a]</i>  <i>[Authority: WAC 173-401-600(1)(c)]</i></p>	<p>Atlas Bin Part of EU2</p>	<p>M1 M2 M6</p>

AR#	Requirements	Applicability	Monitoring
2.2	<p><b>Atlas Bin Opacity Limit:</b> Visible emissions from the Atlas Bin fabric filter bag house vent (Part of EU2) must not exceed five percent (5%) opacity (six-minute average) as determined in accordance with EPA Method 9.</p> <p><i>[Origin: 16NOC1154, condition 2b]</i>  <i>[Authority: WAC 173-401-600(1)(c)]</i></p>	Atlas Bin Part of EU2	M1 M2 M6
2.3	<p><b>Requirement to Maintain Air Pollution Control (EU2):</b> All air contaminant sources are required to keep any process and/or air pollution control equipment in good operating condition and repair.</p> <p><b>Specific requirements for EU2:</b> For purposes of assuring compliance with the applicable requirement of this condition, the permittee must promptly take appropriate corrective action to maintain EU2 air pollution control equipment in good operating condition and repair as follows:</p> <ul style="list-style-type: none"> <li>a) The target operating ranges specified for EU2 in Table M3 of condition M6 must be used as an indication of good operating condition of EU2 air pollution controls.</li> <li>b) Appropriate corrective action must be taken as soon as possible, but in no case later than 24 hours from the time monitoring indicates out-of-range operations.</li> <li>c) Appropriate corrective action must, at a minimum, include an inspection of the air pollution control system.</li> <li>d) Inability to meet any target operating range specified for EU2 in Table M3 must be considered a “malfunction” of air pollution controls.</li> <li>e) Inability to meet any target operating range specified for EU2 does not by itself constitute a deviation of this condition, provided that the permittee promptly took appropriate corrective action to address the out-of-range operations.</li> </ul> <p><i>[Origin: ORCAA 8.8 (local only)]</i>  <i>[Authority: WAC 173-401-600(1)(b)]</i>  <i>[Authority for Specific Provisions: WAC 173-401-600(1) and (2)]</i></p>	EU2	M1 M2 M6
<b>Package Boiler (EU3)</b>			
3.1	<p><b>EU3 Fuel Standards.</b> The package boiler must combust only natural gas or propane fuel.</p> <p><i>[Origin: 11NOC0869, condition #4a (as approved 3/28/2012)]</i>  <i>[Authority: WAC 173-401-600(1)(c)]</i></p>	EU3	M5
3.2	<p><b>EU3 Particulate Limit.</b> Particulate emissions from EU3 must not exceed 0.02 gr/dscf corrected to 7% oxygen (back half included), except during startup, shutdown, or malfunction in accordance with ORCAA Rule 8.7.</p> <p>Reference Method: Method 5, including the back-half catch, as specified in 40 CFR Part 60, Appendix A.</p>	EU3	M1 M2 M8 M9

AR#	Requirements	Applicability	Monitoring
	<p><i>[Origin: 96NOC014, condition #3 (as approved 6/7/1996)]</i>  <i>[Authority: WAC 173-401-600(1)(c)]</i></p>		
3.3	<p><b>EU3 Opacity Limit.</b> Visual emissions from the boiler must not exceed ten (10) percent opacity for three consecutive minutes in any one hour as determined by EPA reference Method 9, except during startup, shutdown, or malfunction in accordance with ORCAA Rule 8.7.</p> <p>Reference Method: EPA reference Method 9 modified for the time period of the limit.</p> <p><i>[Origin: 96NOC014, condition #4 (as approved 6/7/1996)]</i>  <i>[Authority: WAC 173-401-600(1)(c)]</i></p>	EU3	M1 M2
3.4	<p><b>EU3 NOx Limit.</b> NOx emissions from EU3 must not exceed 140 ppmvd (parts per million by volume, dry), adjusted to 3% oxygen, one hour average, except during startup, shutdown, or malfunction in accordance with ORCAA Rule 8.7.</p> <p>Reference Method: EPA Reference Methods 7, 7A, 7C or 7D.</p> <p><i>[Origin: 96NOC014, condition #6 (as approved 6/7/1996)]</i>  <i>[Authority: WAC 173-401-600(1)(c)]</i></p>	EU3	M8 M9
3.5	<p><b>EU3 CO Limit.</b> CO emissions from the boiler must not exceed 100 ppmvd, adjusted to 3% oxygen, one-hour average, except during startup, shutdown, or malfunction in accordance with ORCAA Rule 8.7.</p> <p><i>[Origin: 96NOC014, condition #7 (as approved 6/7/1996)]</i>  <i>[Authority: WAC 173-401-600(1)(c)]</i></p>	EU3	M8 M9
3.6	<p><b>Requirement to Minimize Emissions from Boiler (EU3):</b>  At all times, including periods of startup, shutdown, and malfunction, the permittee must maintain and operate EU3 and associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.</p> <p><i>[Origin: 40 CFR 60.11(d); 11NOC869, condition 4b]</i>  <i>[Authority: WAC 173-401-600(1)(a)]</i></p>	EU3	M9
3.7	<p><b>ORCAA Requirement to Maintain Air Pollution Control (EU3):</b> All air contaminant sources are required to keep any process and/or air pollution control equipment in good operating condition and repair.</p> <p><b>Specific Requirements for EU3:</b> For purposes of assuring compliance with the applicable requirement of this condition, the permittee must promptly take appropriate corrective action to maintain EU3 combustion control equipment in good operating condition and repair as follows:</p> <p>a) The target operating ranges recommended by the boiler manufacturer as specified in condition M9 must be used as an indication of good</p>	EU3	M9

AR#	Requirements	Applicability	Monitoring
	<p>operating condition of EU3 air pollution controls except during startup or shutdown of the boiler.</p> <p>b) Appropriate corrective action must be taken as soon as possible from the time monitoring indicates out-of-range operations.</p> <p>c) Appropriate corrective action must, at a minimum, include an inspection of the combustion control systems.</p> <p>d) Inability to meet any recommended target operating range as specified in condition M9 must be considered a “malfunction” of air pollution controls for EU3.</p> <p>e) Inability to meet any target operating range for EU3 does not by itself constitute a deviation of this condition, provided that the permittee promptly took appropriate corrective action to address the out-of-range operations.</p> <p><i>[Origin: ORCAA 8.8 (local only); 11NOC869 conditions 4d and 4f]</i>  <i>[Authority: WAC 173-401-600(1)(b)]</i>  <i>[Authority for Specific Provisions: WAC 173-401-600(1) and (2)]</i></p>		
3.8	<p><b>EU3 Operation and Maintenance Plan.</b> An Operation and maintenance (O&amp;M) plan for purposes of maintaining the boiler and associated equipment, attending to the prompt repair of any defective equipment and record-keeping must be devised and kept on-site. The Manufacturer’s recommended operating ranges for each indicator of proper combustion (O2, NOx and CO) must be documented in a written Operation and Maintenance (O&amp;M) plan for the boiler.</p> <p><i>[Origin: 96NOC014, condition #8 (as approved 3/28/2012)]</i>  <i>[Authority: WAC 173-401-600(1)(c)]</i></p>	EU3	M9
<b>Lumber Dry Kilns (EU4)</b>			
Lumber dry kilns are not subject to any requirements other than the general applicable requirements.			
<b>Surface Coating Line (EU5)</b>			
4.1	<p><b>Approved Primer</b></p> <p>a. The cumulative amount of primer applied during any day must not exceed 30 gallons, unless prior approval is granted by ORCAA.</p> <p>b. The primer used must contain no Toxic Air Pollutants (TAP) other than those shown in Table AR4.1 unless prior approval is granted by ORCAA.</p> <p>c. The primer used must not exceed the composition limits shown in Table AR4.1 unless prior approval is granted by ORCAA.</p>	EU4	M10

AR#	Requirements	Applicability	Monitoring																								
	<p><b>Table AR4.1: Primer Composition Limits</b></p> <table border="1" data-bbox="225 302 1114 621"> <thead> <tr> <th data-bbox="225 302 656 340">Primer Ingredient:</th> <th data-bbox="656 302 846 340">Classification</th> <th data-bbox="846 302 992 340">CAS #</th> <th data-bbox="992 302 1114 340">% by wt</th> </tr> </thead> <tbody> <tr> <td data-bbox="225 340 656 378">VOC (non-water VOC)</td> <td data-bbox="656 340 846 378">VOC</td> <td data-bbox="846 340 992 378">N/A</td> <td data-bbox="992 340 1114 378">1.88%</td> </tr> <tr> <td data-bbox="225 378 656 415">Solids</td> <td data-bbox="656 378 846 415">Particulate</td> <td data-bbox="846 378 992 415">N/A</td> <td data-bbox="992 378 1114 415">63.19%</td> </tr> <tr> <td data-bbox="225 415 656 499">2-Butoxyethanol (Ethylene glycol monobutyl ether)</td> <td data-bbox="656 415 846 499">TAP</td> <td data-bbox="846 415 992 499">111-76-2</td> <td data-bbox="992 415 1114 499">0.91%</td> </tr> <tr> <td data-bbox="225 499 656 583">1,2-Propanediol (Propylene glycol)</td> <td data-bbox="656 499 846 583">TAP</td> <td data-bbox="846 499 992 583">57-55-6</td> <td data-bbox="992 499 1114 583">0.05%</td> </tr> <tr> <td data-bbox="225 583 656 621">Petroleum Derivative</td> <td data-bbox="656 583 846 621">VOC</td> <td data-bbox="846 583 992 621">91-20-3</td> <td data-bbox="992 583 1114 621">0.0002%</td> </tr> </tbody> </table> <p data-bbox="225 657 862 688"><i>[Origin: WAC 173-460-070; 20NOC1457, condition #2]</i></p> <p data-bbox="225 690 646 722"><i>[Authority: WAC 173-401-600(1)(c)]</i></p>	Primer Ingredient:	Classification	CAS #	% by wt	VOC (non-water VOC)	VOC	N/A	1.88%	Solids	Particulate	N/A	63.19%	2-Butoxyethanol (Ethylene glycol monobutyl ether)	TAP	111-76-2	0.91%	1,2-Propanediol (Propylene glycol)	TAP	57-55-6	0.05%	Petroleum Derivative	VOC	91-20-3	0.0002%		
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4.2	<p><b>Spray Booth Requirements:</b> The spray booth for applying primer must meet the following specifications:</p> <ol style="list-style-type: none"> <li data-bbox="272 806 906 837">Partially enclosed, cross-flow spray booth design.</li> <li data-bbox="272 840 1105 942">Design exhaust rate of 14,000 ACFM @ 0.65", which may be demonstrated through written documentation on the spray booth provided by the manufacturer.</li> <li data-bbox="272 945 656 976">Propane/electrically heated.</li> <li data-bbox="272 978 1105 1121">Stack height at least six feet above the peak height of the building. There must be no flow obstructions at the point of discharge (i.e. cap). However, a weatherproof stack exhaust configuration that does not obstruct the air flow as it exits the stack is acceptable.</li> <li data-bbox="272 1123 1114 1266">Equipped with filters capable of an average paint arrest or filtration efficiency of at least 99%, which may be demonstrated through written documentation on the filters provided by the filter supplier or manufacturer.</li> <li data-bbox="272 1268 1052 1331">Equipped with a manometer to read pressure drop across the spray booth filters.</li> </ol> <p data-bbox="225 1373 922 1404"><i>[Origin: ORCAA Rule 6.1.4(a)(2); 20NOC1457, condition #3]</i></p> <p data-bbox="225 1407 646 1438"><i>[Authority: WAC 173-401-600(1)(c)]</i></p>	EU4	N/A																								
4.3	<p><b>Operating Requirements:</b> The following operating requirements apply:</p> <ol style="list-style-type: none"> <li data-bbox="272 1482 1105 1585">Primer must be applied within the approved spray booth and only when the spray booth doors are closed and the exhaust and filtration system is fully operating.</li> <li data-bbox="272 1587 1052 1690">Spray guns must be capable of achieving at least 60% transfer efficiency, which may be demonstrated through written documentation for each spray gun used.</li> <li data-bbox="272 1692 1060 1755">Spray booth filters must be properly seated and must cover all openings of the exhaust air intakes.</li> <li data-bbox="272 1757 1114 1860">Filters must be replaced whenever damaged or loaded with particulate build-up to an extent that jeopardizes the effectiveness of the spray booth to capture emissions.</li> </ol>	EU4	M10																								

AR#	Requirements	Applicability	Monitoring
	<ul style="list-style-type: none"> <li>e. Pressure drop across the spray booth filters must not exceed the level that jeopardizes effectiveness of the spray booth. The acceptable operating pressure drop range must be visibly posted on the spray booth.</li> <li>f. Keeping volatile materials in closed containers when not being used.</li> <li>g. Storing all solvents or solvent-containing cloth or other material used for surface preparation in closed, airtight containers.</li> <li>h. Minimizing and promptly cleaning up all volatile material spills and leaks.</li> </ul> <p><i>[Origin: ORCAA Rule 8.8; 20NOC1457 condition #4]</i>  <i>[Authority: WAC 173-401-600(1)(c)]</i></p>		
<b>Emergency Engines (EU6 and EU7)</b>			
5.1	<p><b>Emergency Engine Maintenance.</b> The permittee must:</p> <ul style="list-style-type: none"> <li>a. Change oil and filter every 500 hours of operation or annually, whichever comes first;</li> <li>b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and,</li> <li>c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.</li> </ul> <p><i>[Origin: 40 CFR § 63.6603(a); Items 4(a,b,c) of Table 2d to Subpart ZZZZ of 40 CFR Part 63]</i>  <i>[Authority: WAC 173-401-600(1)(a)]</i></p>	EU6 EU7	No monitoring, records only: RK3
5.2	<p><b>Emergency Engine Operation.</b></p> <ul style="list-style-type: none"> <li>a. The permittee must operate and maintain the emergency engines according to the manufacturer’s emission-related written instructions or develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. <i>[Origin: 40 CFR § 63.6625(e)(3)]</i></li> <li>b. The permittee 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. <i>[Origin: 40 CFR § 63.6625(h)]</i></li> <li>c. The permittee must operate the emergency engines according to the following requirements: <ul style="list-style-type: none"> <li>i. There is no time limit on the use of emergency engines in emergency situations.</li> <li>ii. Each emergency engine must only be operated during emergencies and for up to 100 hours per calendar year for</li> </ul> </li> </ul>	EU6 EU7	No monitoring, records only: RK3



AR#	Requirements	Applicability	Monitoring												
	<p>maintenance, readiness testing, and certain non-emergency situations as allowed under 40 CFR § 63.6640(f).</p> <p><i>[Origin: 40 CFR § 63.6640(f)]</i>  <i>[Authority: WAC 173-401-600(1)(a)]</i></p>														
5.3	<p><b>Engine Hour Meter.</b> For each emergency engine the permittee must install a non-resettable hour meter if one is not already installed.</p> <p><i>[Origin: 40 CFR § 63.6640(f)]</i>  <i>[Authority: WAC 173-401-600(1)(a)]</i></p>	<p>EU6 EU7</p>	RK3												
<b>Glues and Adhesives Line (EU8)</b>															
6.1	<p><b>Adhesive Material Limits:</b> The Facility is approved to apply glues and adhesives containing the Toxic Air Pollutants (TAP) listed in Table 6.1 at the concentrations shown and at the annual limits shown. The Facility may use adhesives and glues containing these TAP at higher concentrations or containing TAP not listed in Table 1 provided prior approval by ORCAA. Compliance with Table 1 will be demonstrated during the annual emissions inventory.</p> <p><b>Table 6.1: Glues and Adhesive Line Limits</b></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>CAS</th> <th>Annual Emissions Limits (lbs)</th> </tr> </thead> <tbody> <tr> <td>Formaldehyde</td> <td>50-00-0</td> <td>328</td> </tr> <tr> <td>MDI</td> <td>101-68-8</td> <td>2.12</td> </tr> <tr> <td>Vinyl Acetate</td> <td>108-05-4</td> <td>5110</td> </tr> </tbody> </table> <p><i>[Origin: 21NOC1538, condition #1]</i>  <i>[Authority: WAC 173-401-600(1)(c)]</i></p>	Pollutant	CAS	Annual Emissions Limits (lbs)	Formaldehyde	50-00-0	328	MDI	101-68-8	2.12	Vinyl Acetate	108-05-4	5110	EU8	RK3
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Formaldehyde	50-00-0	328													
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Vinyl Acetate	108-05-4	5110													

[END OF SECTION]

## VIII. MONITORING TERMS AND CONDITIONS (M)

**M1. Opacity Surveys.** The Permittee must conduct visual opacity surveys of the Facility during daylight hours as follows:

- a) The surveys must consist of visual observation of all emission units to identify point and fugitive emissions exhibiting opacity greater than zero percent (0%).
- b) Opacity surveys must be conducted at least weekly.
- c) Surveys must be conducted from locations with a clear view of the target emission unit and where the sun is at the observer's back. Survey locations must be at least 15 feet but not more than .25 miles from the Facility.
- d) Observer certification for plume evaluation is not required to conduct the survey. However, it is necessary the observer is educated on the general procedures for determining the presence of visible emissions. As a minimum, the observer must be trained and knowledgeable regarding the effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, observer position relative to source and sun, and the presence of uncombined water.
- e) Each stack must be observed when the connected emissions unit is operating, and for a minimum of 15 continuous seconds during the survey.
- f) Any visible emissions observed from an emissions unit or area of the Facility other than uncombined water must be recorded as a positive reading.
- g) If it is not possible to conduct the survey due to inclement weather conditions, the Permittee must make three attempts during the day to conduct the survey. All attempts to conduct the survey must be recorded in accordance with Condition RK3.
- h) The observer must record the wind direction, sky condition, sun location with respect to the Facility and the survey location, and the time duration of the survey.

*[Origin: N/A]*

*[Authority: WAC 173-401-615(1)(b)]*

**M2. Opacity Compliance Demonstration Required.**

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

- i) Certified opacity readings must be completed within 1 hour of the opacity survey that initially triggered the reference test method readings unless the subject emission unit is not operating, or lack of daylight or weather conditions prevent conducting the testing;
- ii) Certified opacity readings must be performed by persons with current EPA Method 9 certification in plume evaluation;
- iii) All certified opacity readings must be performed during periods when the subject emissions unit is operating;
- iv) If the subject emissions unit is down for maintenance or not operating, the Permittee must commence compliance verification within one hour after the unit comes back on line;
- v) If it is not possible to perform certified opacity readings due to inclement weather conditions or lack of daylight, the Permittee must document the conditions and must make repeated daily attempts to conduct the testing until it is accomplished;
- vi) Opacity must be computed from visual observations consistent with the Reference Test Methods of each applicable opacity limit;
- vii) For both reference test methods, the minimum duration for certified readings must not be less than 12 minutes;
- viii) However, if any individual reading made at 15-second intervals is higher than 20% opacity, certified readings must be conducted for a full 60 minutes or until readings indicate the general 20% opacity standard was exceeded;
- ix) For Ecology Method 9A, The opacity standard is exceeded if there are more than 12 individual readings, during any consecutive 60-minute period, for which an opacity greater than the standard is recorded; and,
- x) For EPA Method 9, the opacity standard is exceeded if the average of 24 consecutive observations recorded at 15-second intervals is greater than the standard.

*[Origin: N/A]*

*[Authority: WAC 173-401-615(1)(b)]*

**M3. Monitoring Air Impacts Detrimental or a Nuisance to Persons or Property.** The Permittee must monitor all air quality related complaints directed to the Facility when operating as follows:

- a) The Permittee must provide an automatic phone recording system or an onsite contact person available to the general public for filing a complaint whenever the Facility is operating.
- b) The Permittee must monitor complaints received in a timely manner by investigating and assessing the validity of each complaint, and documenting the complaint in accordance with RK8.

*[Origin: N/A]*

*[Authority: WAC 173-401-615(1)(b)]*

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

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

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

Area or EU	Reasonable and Appropriate Precautions
Wood Residuals Handling Systems	<ol style="list-style-type: none"> <li>1. Conveyors used to transport wood residuals containing particulate (sawdust, chipped wood, planer shavings, and wood dust) completely enclosed, except for portions of the system where materials are not transported such as return belts.</li> <li>2. Pneumatic conveyor ducts are free of leaks that exhibit opacity.</li> <li>3. Material drop points along the enclosed wood residuals conveyor system must be enclosed or shrouded.</li> <li>4. Truck loading operations sufficiently enclosed and/or shrouded to prevent visible airborne dust persisting beyond the Facility boundary.</li> <li>5. Wood residual piles contained to prevent material from becoming airborne.</li> </ol>

[Origin: N/A]

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

**M5. Sulfur Dioxide Emissions Monitoring.** The following fuel-specific monitoring is required:

**TABLE M2: Fuel-Specific Sulfur Monitoring**

Approved Fuel Type	Required Monitoring
Diesel	<ul style="list-style-type: none"> <li>• The Permittee must verify via fuel certifications, SDS or written contract with the diesel supplier that the sulfur content of the fuel purchased was 0.0015% sulfur or less.</li> <li>• When required, SO<sub>2</sub> emission rates must be determined via mass-balance calculation methods using a sulfur content of 0.0015% by weight, the actual amount of fuel combusted, and assuming that all sulfur is converted to SO<sub>2</sub>.</li> </ul>
Natural Gas and Propane	<ul style="list-style-type: none"> <li>• The Permittee must confirm via fuel certifications, SDS or written contract with the gas supplier that only natural gas or propane were supplied.</li> <li>• When required, SO<sub>2</sub> emissions rates must be determined using the natural gas or propane emission factors from AP-42 and the actual amount of natural gas or propane combusted.</li> </ul>

[Origin: N/A]

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

**M6. Pollution Control Equipment Monitoring.** The Permittee must monitor air pollution control equipment and systems for the specified emission units according to Table M3 and must monitor and document corrective actions taken to maintain operations within target operating ranges. The Permittee is exempt from monitoring an emissions unit when it is shut down, provided the Permittee keeps a contemporaneous record showing that the emissions unit did not operate during the entirety of the corresponding monitoring period.

**TABLE M3 Prescribed Operating Ranges for Pollution Control Equipment**

EU	Monitoring Requirement	Prescribed Operating Ranges and Parameters	Frequency
EU2	Observe operation of Atlas Bin	Atlas Bin cyclones (C-15A, B and C) exhaust through the Atlas Bin baghouse (Baghouse 6).	Weekly Inspection/Audit
EU2	Observe truck loading operations	Displaced air during truck loading exhaust through Baghouse 5.	Weekly Inspection/Audit
EU2	Observe and record pressure drop across all baghouses	Operating pressure drop is within 0.1 to 4 inches water column.	Daily
EU2	Inspect all baghouses	No significant accumulation of dust around, on or under baghouses indicative of fugitive leaks.	Daily
EU2	Inspect all cyclones and pneumatic transport systems	No significant accumulation of dust around, on or under cyclones or pneumatic transport systems indicative of fugitive leaks or failure of a cyclone.	Daily
EU5	Inspect paint arrestance filters	Check to ensure filters are properly seated and free of paint build up.	Weekly Inspection/Audit

*[Origin: N/A]*

*[Authority: WAC 173-401-615(1)(b)]*

**M7. GHG Monitoring Requirements.** The Permittee must monitor Facility operations, fuel rates and composition of fuels as necessary to report GHG emissions to Ecology in accordance with Chapter 173-441 WAC. The following monitoring provisions apply:

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

*[Origin: Chapter 173-441 WAC (state only)]*

*[Authority: WAC 173-401-615(1)(a)]*

**M8. Emissions Testing.**

These monitoring requirements apply to conditions AR1.7, 1.8, 1.9, 1.10, 3.2, 3.4, and 3.5.

When required by ORCAA, the permittee must demonstrate compliance through emissions testing according to the following methods and procedures:

- a) **Test Plan:** Before conducting a required test, the permittee must develop a Stack Test Plan that describes test methods, procedures, objectives and schedule. The stack test plan must be submitted at least 30-days ahead of testing. *[Origin: N/A - gap filling monitoring]*
- b) **ORCAA Testing Authority:** In order to demonstrate compliance with emission standards, ORCAA has the authority to require an emissions unit to be tested, either by Agency personnel or by the permittee, using source test procedures approved by the Agency. The permittee shall be given reasonable advance notice when required to test. *[Origin: ORCAA 1.5(j)]*
- c) **Washington General Test Methods:** To demonstrate compliance, ORCAA may conduct or require that a test be conducted of the source using approved test methods from 40 CFR Parts 51, 60, 61 and 63 or procedures contained in the latest version of "Source Test Manual - Procedures for Compliance Testing," state of Washington, department of ecology. The operator of a source may be required to provide the necessary platform and sampling ports for ecology personnel or others to perform a test of an emissions unit. Ecology (or ORCAA) must be allowed to obtain a sample from any emissions unit. The operator of the source shall be given an opportunity to observe the sampling and to obtain a sample at the same time. *[Origin: WAC 173-400-105(4)]*
- d) **Appropriate Testing Facilities:** When requested by ORCAA, the permittee is required to provide an appropriate source testing platform and sampling ports. *[Origin: ORCAA 1.5(j)]*
- e) **Particulate test procedures:** ORCAA particulate test procedures must be used to determine compliance with the particulate limits in conditions. ORCAA rules require including the Method 5 "back-half" condensable particulate matter for determining compliance with ORCAA general particulate matter standards. *[Origin: ORCAA 8.3(a)]*
- f) **Test Conditions:** The permittee must conduct performance tests at representative operating load and conditions or under such conditions as ORCAA specifies. *[Origin: N/A - gap filling monitoring]*
- g) **Test Report:** The permittee must submit a test results to ORCAA within 45-days of testing or another time-frame as approved by ORCAA. *[Origin: N/A - gap filling monitoring]*

*[Origin: listed by sub-condition]*

*[Authority: WAC 173-401-615(1)(a)&(b)]*

#### **M9. Boiler Combustion Evaluation:**

These monitoring requirements apply to conditions AR3.2, 3.4, 3.5, 3.6, 3.7, and 3.8.

Combustion efficiency of EU3 must be evaluated at least annually by comparing measured O<sub>2</sub>, NO<sub>x</sub> and CO concentrations with acceptable ranges for each gas recommended by the boiler manufacturer. The Manufacturer's recommended operating ranges for O<sub>2</sub>, NO<sub>x</sub> and CO must

be documented in the written Operation and Maintenance (O&M) plan for the boiler required by condition AR3.8. The annual combustion evaluation of EU3 required must:

- a) Be conducted using an electrochemical cell combustion analyzer, analyzer used for reference method testing, or another analyzer pre-approved by ORCAA;
- b) Must be representative of maximum intended operating conditions during that year.
- c) The analyzer(s) response to span gas of a known concentration must be determined before and after testing.
- d) No more than 12 hours may elapse between span gas response checks.
- e) The results of the analyzer response check shall not be valid if the pre and post response check results vary by more than 10% of the span gas value.
- f) The CO and NO<sub>x</sub> span gas concentrations must be no less than 50% and no more than 200% of the emission concentration corresponding to the Manufacturer's recommended operating range for the boiler.
- g) A lower concentration span gas may be used if it is more representative of measured concentrations.
- h) Ambient air may be used to zero the CO and NO<sub>x</sub> cells/analyzer(s) and span the oxygen cell/analyzer.

*[Origin: 11NOC869 conditions #4c and 4e]*

*[Authority: WAC 173-401-615(1)(a)]*

**M10. Monitoring Requirements for Surface Coating Operation (EU5).** The following monitoring requirements apply only to the surface coating operation (EU5).

Spray Booth Monitoring Requirements. The following operating parameters must be monitored at the indicated frequency:

- a) Daily amount of primer applied; and,
- b) Pressure drop across the spray booth filters at least once weekly when primer is applied.

*[Origin: ORCAA Rule 8.8 (local only); 20NOC1457 condition #5]*

*[Authority: WAC 173-401-615(1)(a)]*

*[END OF SECTION]*

## IX. RECORDKEEPING (RK)

**RK1. Retention and Availability of Records:** The Permittee shall maintain all records required by this permit. All required records shall be retained for at least 5 years from the origination date and shall be available for inspection by ORCAA upon request.

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

[Authority: WAC 173-401-615(2)]

**RK2. Record of Changes.** The Permittee shall maintain records describing changes made resulting in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

[Origin: WAC 173-401-615 (2)(b); WAC 173-401-724(5)]

[Authority: WAC 173-401-615(2)]

**RK3. Monitoring Records.** The Permittee must keep the following records:

Equipment/Operation	Required Record	Origin
<b>EU2 Wood Residuals Transport Systems:</b> Atlas Bin Baghouse Maintenance Records	The permittee must keep records associated with maintaining the Atlas Bin baghouse.	16NOC1154 Condition 3
<b>EU2 Wood Residuals Transport Systems:</b> Baghouses	Operating pressure drop across each baghouse.	Gap filling monitoring
<b>EU3 Boiler</b>	Monthly and 12-month cumulative record of the amount of natural gas and propane combusted each calendar month. To meet this requirement, the permittee may elect to record and maintain records of the total amount of natural gas and propane delivered to the mill each calendar month.	40 CFR § 60.48c(g); 11NOC869 Condition 5a
	Date and duration of any startup, shutdown, or malfunction of EU3 in accordance with 40 CFR § 60.7(b).	40 CFR § 60.7(b)
	Written record of the manufacturer recommended operating concentrations for O <sub>2</sub> , NO <sub>x</sub> and CO, which are used to evaluate combustion efficiency during annual boiler tune-ups.	11NOC869 Condition 5b
	Record of annual boiler tune-ups.	11NOC869 Condition 5c
	Boiler maintenance records.	Gap filling monitoring
<b>EU5 Surface Coating Line:</b> Spray booth	<ul style="list-style-type: none"> <li>a. Daily amount of primer applied in gallons;</li> <li>b. Spray booth pressure-drop records;</li> <li>c. Spray booth design exhaust rate provided by the spray booth manufacturer;</li> <li>d. Published transfer efficiency ratings for each spray gun model used;</li> <li>e. Published efficiency ratings for the spray booth filters used; and,</li> </ul>	20NOC1457 Condition 6



	f. Current Safety Data Sheets (SDS) for the primer used.	
<b>EU6 and EU7 Emergency Engines</b>	The permittee shall maintain files of all emergency engine information (including all reports and notifications in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.	40 CFR § 63.10(b)(1); 40 CFR § 63.6660(a,b,c)
	All documentation supporting initial notifications and notifications of compliance status.	40 CFR § 63.10(b)(2)(xiv)
	A maintenance log or similar device demonstrating compliance with Conditions AR5.1 and AR5.2.	40 CFR § 63.6655(e)
	Records demonstrating the permittee is: i. Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or ii. Permittee shall develop and follow their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.	40 CFR § 63.6655(d); Item 9a(i and ii) of Table 9 to 40 CFR Part 63 Subpart ZZZZ
	The permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. Permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in §63.6640(f)(2)(ii) or (iii) or §63.6640(f)(4)(ii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.	40 CFR § 63.6655(f)
<b>EU8 Glues and Adhesives Line</b>	1. Purchase invoices indicating the amount of VOC and TAP-containing materials used in glue and adhesive application operations including the date of purchase and corresponding product identification numbers. 2. Monthly record of the actual cumulative amount of VOC and TAP-containing materials (used in glue and adhesives application	21NOC1538 Condition 2

	<p>operations) used in terms of gallons per month and gallons per previous 12-consecutive months.</p> <p>3. Safety Data Sheets (SDS) for all VOC and TAP-containing materials on site associated with glue and adhesives application operations.</p>	
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*[Origin: As indicated in Table]*

*[Authority: WAC 173-401-615(2); WAC 173-401-616(1)(b)]*

**RK4. Record of Permit Deviations.** The Permittee shall maintain a contemporaneous record of all permit deviations.

*[Origin: WAC 173-401-615(3)(b)]*

*[Authority: WAC 173-401-615(2)]*

**RK5. Emissions Records.** The Permittee must maintain and make available upon request any records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards.

*[Origin: WAC 173-400-105(1); ORCAA Rule 8.11(a) (local only)]*

*[Authority: WAC 173-401-615(2)]*

**RK6. Unlawful Reproduction or Alteration of Documents.** No person shall reproduce or alter, or cause to be reproduced or altered, any order, registration certificate or other paper issued by ORCAA if the purpose of such reproduction or alteration is to evade or violate any applicable requirement.

*[Origin: ORCAA Rule 7.3 (local only)]*

*[Authority: WAC 173-401-615(2)]*

**RK7. Display of Orders, Certificates and Other Notices.** Any order required by ORCAA Regulations shall be available on the premises designated on the order. In the event ORCAA requires a notice to be displayed, it shall be posted.

*[Origin: ORCAA Rule 7.4 (local only)]*

*[Authority: WAC 173-401-615(2)]*

**RK8. Record of Complaints.** The Permittee must keep a record of air quality related complaints received, the assessment of the validity of each complaint, and what, if any, corrective action was taken in response to the complaint. Records must include, if available or provided, the following information:

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

*[Origin: WAC 173-400-040(6) (state/local only); ORCAA Rule 8.5 (local only); ORCAA Rule 8.3(e) (local only); ORCAA Rule 7.6 (local only)]*  
*[Authority: WAC 173-401-615(2)]*

**RK9. Record of Actions Taken to Maintain Air Pollution Control Equipment.** The Permittee must keep a record of any actions taken to maintain air pollution control equipment in good operating condition and repair including repairs or routine maintenance actions and actions involving only inspection of the equipment. Such records must include:

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

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

**RK10. MACT Applicability Records.** For each relevant standard or other applicable requirement under 40 CFR Part 63, which the Permittee determines inapplicable, the Permittee must keep record of the applicability determination on site for 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. For the purposes of this condition, a relevant standard is defined as any standard for which:

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

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

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

**RK11. Records Required for Greenhouse Gas (GHG) Reporting.** If the Permittee is required to prepare annual GHG reports to Ecology pursuant to Chapter 173-441 WAC, the Permittee must maintain records in accordance with WAC 173-441-050, retaining, at a minimum, the following:

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

- b) The data used to calculate the GHG emissions for each unit, operation, process, and activity, categorized by fuel or material type. These data include, but are not limited to, the following information:
  - i) The GHG emissions calculations and methods used, as required by WAC 173-441-120.
  - ii) Analytical results for the development of site-specific emissions factors.
  - iii) The results of all required analyses for high heat value, carbon content, and other required fuel or feedstock parameters.
  - iv) Any Facility operating data/process information used for the GHG emission calculations.
- c) Copies of the annual GHG reports.
- d) Missing data computations. For each missing data event, also retain a record of the cause of the event and the corrective actions taken to restore malfunctioning monitoring equipment.
- e) The GHG Emissions Monitoring Plan required by condition M7.
- f) The results of all required certification and quality assurance tests of continuous monitoring systems, fuel flow meters, and other instrumentation used to provide data for the GHGs reported under this chapter.
- g) Maintenance records for all continuous monitoring systems, flow meters, and other instrumentation used to provide data for the GHGs reported under this chapter.

*[Origin: WAC 173-441-050(6) (state only)]*

*[Authority: WAC 173-401-615(2)]*

**RK12. Material Composition Records:** The permittee must maintain copies of up-to-date and representative Safety Data Sheets (SDS) of all VOC and HAP containing materials used.

*[Origin: Condition PA1]*

*[Authority: WAC 173-401-615(2)]*

*[END OF SECTION]*

## X. REPORTING (R)

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

- a) Identification of each term or condition of the permit that is the basis of the certification.
- b) Certification of the status of compliance with each term or condition of the permit and whether compliance was continuous or intermittent over the reporting period.
- c) Identification of the method(s) or other means used by the Permittee for determining the compliance status, and whether such methods or other means provide continuous or intermittent data.

*[Origin: WAC 173-401-630(5)]*

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

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

- a) The information relates to processes or production unique to the Permittee or are likely to affect adversely the competitive position of the Permittee if released to the public or to a competitor;
- b) The Permittee follows ORCAA's policy for submitting confidential information; and,
- c) The Permittee certifies the proprietary and/or confidential nature of the records or information.

*[Origin: ORCAA Rule 1.6 (local only)]*

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

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

- a) A summary of results of all required monitoring for all emissions units over the reporting period;
- b) Identification and characterization of all instances of deviations from permit requirements;
- c) Summary description of any corrective actions taken to maintain air pollution controls in good operating condition;

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

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

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

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

*[Origin: WAC 173-401-615(3)(b); WAC 173-401-645(3)(d); 96NOC014 Condition 10]*

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

**R5. Notification of Complaint Received.** The Permittee must notify ORCAA of any complaint received as soon as possible, but no later than two business days from when the complaint is received. If requested by ORCAA, the Permittee must submit a complaint investigation report which shall include a short description of the complaint, time it was received, actions taken, actions planned and preliminary assessment. Any complaint investigation report submitted must be certified according to condition G5.

*[Origin: WAC 173-400-040(6) (state/local only); ORCAA Rule 7.6 (local only); ORCAA Rule 8.3(e) (local only); ORCAA Rule 8.5 (local only); ]*

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

**R6. Annual Inventory Report.** No later than March 1<sup>st</sup> of each year, the Permittee must submit an inventory of the actual amount of pollutants emitted during the previous calendar year. The inventory must be submitted to ORCAA on standard inventory reporting forms and be accompanied by associated calculations, data or other information used in calculating the reported emissions. A request for an extension may be considered if a request from the Responsible Official is received by ORCAA prior to February 25<sup>th</sup>. The request must include a statement of the unexpected circumstances that occurred, how this affected the Permittee's ability to submit the report on time, and the number of additional days needed.

*[WAC 173-400-105(1); ORCAA Rule 8.11 (local only)]*

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

**R7. Submitting Reports via CEDRI.** Reports submitted electronically via CEDRI, which can be accessed through the EPA's CDX (<https://cdx.epa.gov/>), must be submitted as follows:

- a) If required to electronically submit a MACT notification or report via CEDRI, the Permittee must use the appropriate electronic report template on the CEDRI website (<https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri>) for the applicable subpart.
- b) If the Permittee claims some of the information submitted via CEDRI is Confidential Business Information (CBI), submit a complete report, including information claimed to be CBI, to the EPA. The report must be generated using the appropriate form on the CEDRI website or an alternate electronic file consistent with the XML schema listed on the CEDRI website. Submit the file on a compact disc, flash drive, or other commonly used electronic storage medium and clearly mark the medium as CBI. Mail the electronic medium to U.S. EPA/OAQPS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described earlier in this paragraph.
- c) If you are required to electronically submit a report through CEDRI in EPA's CDX, you may assert a claim of EPA system outage for failure to timely comply with the reporting requirement. To assert a claim of EPA system outage, you must meet the requirements outlined in paragraphs (i) through (vii) below:
  - i) You must have been or will be precluded from accessing CEDRI and submitting a required report within the time prescribed due to an outage of either EPA's CEDRI or CDX systems.
  - ii) The outage must have occurred within the period of time beginning five business days prior to the date that the submission is due.
  - iii) The outage may be planned or unplanned.
  - iv) You must submit notification to the Administrator in writing as soon as possible following the date you first knew, or through due diligence should have known, that the event may cause or has caused a delay in reporting.
  - v) You must provide to the Administrator a written description identifying:
    - (1) The date(s) and time(s) when CDX or CEDRI was accessed and the system was unavailable;
    - (2) A rationale for attributing the delay in reporting beyond the regulatory deadline to EPA system outage;

- (3) Measures taken or to be taken to minimize the delay in reporting; and
- (4) The date by which you propose to report, or if you have already met the reporting requirement at the time of the notification, the date you reported.
- vi) The decision to accept the claim of EPA system outage and allow an extension to the reporting deadline is solely within the discretion of the Administrator.
- vii) In any circumstance, the report must be submitted electronically as soon as possible after the outage is resolved.

*[Origin: 40 CFR 63 Subpart ZZZZ]*

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

**R8. State Greenhouse Gas (GHG) Reporting.** The Permittee is subject to the requirement to report greenhouse gas (GHG) emissions to Ecology in accordance with Chapter 173-441 WAC if annual, Facility-wide emissions of carbon dioxide equivalents (CO<sub>2</sub>e) are 10,000 metric tons per year or more from all source categories listed in WAC 173-441-120. The following requirements apply:

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

Greenhouse Gas Report, Air Quality Program  
 Department of Ecology  
 P.O. Box 47600  
 Olympia, WA 98504-7600



- g) The Permittee must submit a revised annual GHG report within 45 days of discovering an annual GHG report previously submitted contains one or more substantive errors. A substantive error is an error that impacts the quantity of GHG emissions reported or otherwise prevents the reported data from being validated or verified. The revised report must correct all substantive errors.
- h) Ecology may notify the Permittee in writing that an annual GHG report previously submitted contains one or more substantive errors. Such notification will identify each such error. The Permittee must, within 45 days of receipt of the notification, either resubmit the report that, for each identified substantive error, corrects the identified substantive error (in accordance with the applicable requirements of this permit) or provide information demonstrating the previously submitted report does not contain the identified substantive error or that the identified error is not a substantive error.

*[Origin: Chapter 173-441 WAC (state only)]*

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

**R9. Subpart ZZZZ Reporting.** The Permittee must report each instance in which they did not meet the Emergency Engine operating limitations in RK3. The permittee must notify ORCAA within 30 days of discovery for each instance in which the permittee does not meet the EU6 and EU7 Emergency Engine requirements of condition RK3.

*[Origin: 40 CFR § 63.6640(b,e)]*

*[Authority: WAC 173-401-615(2)]*

**R10. Notification of Control Equipment Malfunction.** ORCAA must be notified by FAX, phone message, e-mail or in writing of malfunctions of emissions units and associated air pollution control equipment when repairs cannot be completed within 24 hours. For purposes of this notification, the term “malfunction” shall mean that the control equipment is inoperable or cannot maintain operation within the prescribed operating conditions specified in conditions M6 or M9. The notification must be made as soon as possible, but no later than one week from the date the malfunction was discovered. The notification must include a description of the malfunction and any corrective actions taken or planned. Malfunction notifications must be certified according to condition R1. Any notification made via email or phone shall be followed-up with a written notification that is certified per condition R1.

*[Origin: ORCAA 8.8 (local only)]*

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

**R11. Combustion Evaluation Notification and Rescheduling:**

- a) Notification: If requested by ORCAA, the permittee must notify ORCAA in writing at least two weeks (14 days) prior to any combustion evaluation of EU3 per condition M9 and provide ORCAA an opportunity to review an evaluation plan. The plan must describe the proposed instruments to be used for analyzing/measuring emissions, measurement methods and operating conditions proposed for the evaluation.

- b) Rescheduling: If, after providing written notice of a combustion evaluation of EU3, there is a delay (due to operational problems, etc.) in carrying out the scheduled evaluation, the permittee must notify ORCAA as soon as possible of the delay by providing notice of the rescheduled date for the evaluation.

[Origin: Condition M9]

[Authority: WAC 173-401-615(3) and WAC 173-401-630(1)]

**R12. Stack Test Plans.** When compliance determination through a reference method stack test is required per condition M8 or planned on the permittee's initiative, the permittee must

- a) Notify ORCAA in writing at least 30 days prior to the scheduled test; and,
- b) Provide ORCAA an opportunity to review a test plan, which must describe the proposed source test methods, operational conditions proposed for the test and provisions for monitoring source operation during the test.

[Origin: Condition M8]

[Authority: WAC 173-401-615(3) and WAC 173-401-630(1)]

**R13. Stack Test Reports.** Whenever stack testing is required, the permittee must submit test results to ORCAA within 45 days of test completion or another time-frame as approved by ORCAA. The report must include:

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

[Origin: M8]

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

**R14. Addresses for Notifications and Reports:**

- a) Reports required to be sent to the EPA Administrator must be sent to:
  - Part 70 Operating Permit Program
  - U.S. EPA Region 10, Mail Stop: OAW-150
  - 1200 Sixth Avenue, Suite 155
  - Seattle, WA 98101
- b) Reports required to be sent to Olympic Region Clean Air Agency or ORCAA must be sent to:
  - Olympic Region Clean Air Agency
  - 2940 Limited Lane NW
  - Olympia, WA 98502

[Origin: N/A]

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

*[END OF SECTION]*

## XI. PERMIT SHIELD CONDITIONS (S)

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

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

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

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

*[Origin: WAC 173-401-640(2)]*

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

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

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

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

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

*[END OF SECTION]*

**TABLE S.1 RELEVANT REQUIREMENTS DETERMINED INAPPLICABLE OR EXEMPT**

**TABLE S.1 RELEVANT REQUIREMENTS DETERMINED INAPPLICABLE OR EXEMPT**

Relevant Requirement	Exempt or Inapplicable	Brief Description of Requirement	Basis
WAC 173-400-100	Inapplicable	Registration required for listed sources, excluding sources subject to the operating permit program.	The Facility is subject to the operating permit program.
ORCAA Regulation 4	Exempt	Requires registration of regulated air pollution sources.	Per Rule 4.1(a), sources required to obtain an air operating permit are exempt.
ORCAA 8.1	Inapplicable	Residential wood heating standards.	The Facility does not include any residential wood heating devices.
WAC 173-400-040(3)(b)	Inapplicable	Emission unit identified as a significant contributor to non-attainment must use reasonable and available control methods to control emission of contaminants for which the area is designated non-attainment.	No emission units at the Facility have been identified as a significant contributor to non-attainment.
WAC 173-400-040(8)(b)	Inapplicable	Fugitive dust sources identified as significant contributors to PM10 non-attainment must apply RACT.	The Facility is not located in a PM <sub>10</sub> non-attainment area.
Chapter 173-435 WAC	Inapplicable	Emergency episode plan requirements	The Facility has not been requested to prepare such a plan.
WAC 173-401-635	Inapplicable	No "affected source" as defined in WAC 173-401-200(1) shall be permitted as a temporary source [WAC 173-401-635].	WAC 173-401-635 provides that the permitting authority may issue a single AOP authorizing emissions from similar operations at multiple temporary locations, except for "affected sources." Since this permit is for a single location, this provision does not apply.
40 CFR Part 98 Mandatory Greenhouse Gas (GHG) Reporting (Federal)	Inapplicable	Federal Mandatory Greenhouse Gas Reporting Rule established reporting requirements for effected sources.	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.

# Permit Attachments

## Attachment 1 - Definitions

**Administrator** refers to the Administrator of the United States Environmental protection Agency (U.S. EPA). Reports and notifications required to be submitted to the Administrator may be sent in care of U.S. EPA Region 10.

**Calendar year** means the period between January 1 and December 31, inclusive, for a given year.

**Continuous emission monitoring system (CEMS)** means the total equipment that may be required to meet the data acquisition and availability requirements of this part, used to sample, condition (if applicable), analyze, and provide a record of emissions.

**Continuous monitoring system (CMS)** is a comprehensive term that may include, but is not limited to, continuous emission monitoring systems, continuous opacity monitoring systems, continuous parameter monitoring systems, or other manual or automatic monitoring that is used for demonstrating compliance with an applicable regulation on a continuous basis as defined by the regulation.

**Continuous opacity monitoring system (COMS)** means a continuous monitoring system that measures the opacity of emissions.

**Ecology** refers to the Washington Department of Ecology.

**EU** stands for “emission unit”.

**Federally enforceable** means all limitations and conditions that are enforceable by the EPA Administrator, including, but not limited to, the requirements of 40 CFR parts 60, 61, 63, and 65, requirements within any applicable state implementation plan, and any permit requirements established under 40 CFR 52.21 or under 40 CFR 51.18 and 40 CFR 51.24.

**Gaseous fuel** includes, but is not limited to, natural gas, process gas, landfill gas, coal derived gas, refinery gas, and biogas. Blast furnace gas and process gases that are regulated under another subpart of this part, or part 60, part 61, or part 65 of this chapter, are exempted from this definition.

**Heat input** means heat derived from combustion of fuel in a boiler or process heater and does not include the heat input from preheated combustion air, recirculated flue gases, returned condensate, or exhaust gases from other sources such as gas turbines, internal combustion engines, kilns, etc.

**Hourly average** means the arithmetic average of at least four CMS data values representing the four 15-minute periods in an hour, or at least two 15-minute data values during an hour when CMS calibration, quality assurance, or maintenance activities are being performed.

**Intermittent Compliance** means that compliance was assured only for a fraction of the of the reporting period in question due to a violation of the applicable requirement during the period and/or a lapse in the required monitoring.

**Malfunction** shall mean any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner as determined by ORCAA after review of records and data supplied by the permittee. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

**Opacity** means the degree to which emissions reduce the transmission of light and obscure the view of an object in the background.

**Operating day** means a 24-hour period between 12 midnight and the following midnight during which any fuel is combusted at any time in the boiler or process heater unit. It is not necessary for fuel to be combusted for the entire 24-hour period. For calculating rolling average emissions, an operating day does not include the hours of operation during startup or shutdown.

**Oxygen analyzer system** means all equipment required to determine the oxygen content of a gas stream and used to monitor oxygen in the boiler or process heater flue gas, boiler or process heater, firebox, or other appropriate location. This definition includes oxygen trim systems. The source owner or operator must install, calibrate, maintain, and operate the oxygen analyzer system in accordance with the manufacturer's recommendations.

**Oxygen trim system** means a system of monitors that is used to maintain excess air at the desired level in a combustion device over its operating load range. A typical system consists of a flue gas oxygen and/or CO monitor that automatically provides a feedback signal to the combustion air controller or draft controller.

**Particulate matter (PM)** means any finely divided solid or liquid material, other than uncombined water, as measured by the test methods specified under this subpart, or an approved alternative method.

**Permit Deviation** means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or recordkeeping. For a situation lasting more than 24 hours which constitutes a deviation, each 24-hour period is considered a separate deviation. Included in the meaning of



deviation are any of the following:

- A situation where emissions exceed an emission limitation or standard;
- A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met; or,
- A situation in which observations or data collected demonstrates noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit.

**Permit modification** means a change to a title V permit as defined in regulations codified in this chapter to implement title V of the Act (42 U.S.C. 7661).

Potential to emit means the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the stationary source to emit a 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 or the effect it would have on emissions is federally enforceable.

**Responsible official** means one of the following:

- 1) 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:
  - a) The facilities employ more than two hundred fifty persons or have gross annual sales or expenditures exceeding forty-three million in 1992 dollars; or
  - b) The delegation of authority to such representative is approved in advance by the permitting authority;
- 2) For a partnership or sole proprietorship: A general partner or the proprietor, respectively;
- 3) 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
- 4) For affected sources:
  - a) 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
  - b) The designated representative for any other purposes under 40 C.F.R. Part 70.

**Scan** means a short-term observation of the facility such that all emission points are directly observed.

**Wood Residuals** refers to any wood byproduct or waste including hog fuel, planer shavings, sawdust, wood dust, log yard debris, bark and bark dust.

## Attachment 2 - Categorically Exempt, IEUs

WAC 173-401-532(3)

Lubricating oil storage tanks.

WAC 173-401-532(4)

Storage tanks, reservoirs and pumping and handling equipment any size, limited to soaps, lubricants, hydraulic fluid, vegetable oil, grease, animal fat, aqueous salt solutions or other materials and processes using appropriate lids and covers where there is no generation of objectionable odor or airborne particulate matter.

WAC 173-401-532(5)

Pressurized storage of oxygen, nitrogen, carbon dioxide, air, or inert gases.

WAC 173-401-532(7)

Vehicle exhaust from auto maintenance and repair shops.

WAC 173-401-532(8)

Vents from continuous emissions monitors and other analyzers.

WAC 173-401-532(9)

Vents from rooms, buildings and enclosures that contain permitted emissions units or activities from which local ventilation, controls and separate exhaust are provided.

WAC 173-401-532(10)

Internal combustion engines for propelling or powering a vehicle.

WAC 173-401-532(11)

Recreational fireplaces including the use of barbecues, campfires and ceremonial fires.

WAC 173-401-532(12)

Brazing, soldering and welding equipment and oxygen-hydrogen cutting torches for use in cutting metal where in components of the metal do not generated HAPs or HAPs precursors.

WAC 173-401-532(14)

Metal finishing or cleaning using tumblers.

WAC 173-401-532(18)

Drop hammers or hydraulic presses for forging or metal working.

WAC 173-401-532(22)

Inspection equipment for metal products.

WAC 173-401-532(29)

Plastic pipe welding.

WAC 173-401-532(32)

Wax application

WAC 173-401-532(33)

Plant upkeep including routine housekeeping, preparation for and painting of structures of equipment, retarring roofs, applying insulation to buildings in accordance with applicable environmental and health and safety requirements and paving or stripping parking lots.

WAC 173-401-532(35)

Cleaning and sweeping of streets and paved surfaces.

WAC 173-401-532(39)

Steam cleaning operations.

WAC 173-401-532(41)

Food preparation for human consumption including cafeterias, kitchen facilities and barbecues located at a source for providing food service on the premises.

WAC 173-401-532(42)

Portable drums and totes.

WAC 173-401-532(43)

Lawn and landscaping activities.

WAC 173-401-532(45)

General vehicle maintenance including vehicle exhaust.

WAC 173-401-532(46)

Comfort air conditioning or air cooling systems, not used to remove air contaminants from specific equipment.

WAC 173-401-532(47)

Natural draft hoods, natural draft stacks, or natural draft ventilators for sanitary and storm drains, safety valves, and storage tanks subject to size and service limitations expressed elsewhere in this section.

WAC 173-401-532(48)

Natural and forced air vents and stacks for bathroom/toilet facilities.

WAC 173-401-532(49)

Office activities.

WAC 173-401-532(50)

Personal care activities.

WAC 173-401-532(51)

Sampling connections used exclusively to withdraw materials for laboratory analysis and testing.

WAC 173-401-532(52)

Fire fighting and similar safety equipment and equipment used to train fire fighters excluding fire drill pits.

WAC 173-401-532(53)

Materials and equipment used by, and activity related to operation of infirmary; infirmary is not the sources business activity.

WAC 173-401-532(54)

Fuel and exhaust emissions from vehicles in parking lots.

WAC 173-401-532(55)

Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, polishing: ceramics, glass, metals, plastics. Indoor activity with particulate control exhaust vented into building.

WAC 173-401-532(60)

Batch loading and unloading of solid phase catalysts.

WAC 173-401-532(65)

Gas cabinets using only gasses that are not regulated air pollutants.

WAC 173-401-532(67)

Structural changes not having air contaminant emissions.

WAC 173-401-532(70)

Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy, e.g., blueprint activity, photocopiers, mimeograph, telefax, photographic developing, and microfiche.

WAC 173-401-532(72)

Paper trimmers/binders.

WAC 173-401-532(73)

Sample gathering, preparation and management.

WAC 173-401-532(74)

Repair and maintenance activities, not involving installation of an emission unit and not increasing potential emissions of a regulated air pollutant.

WAC 173-401-532(75)

Handling equipment and associated activities for glass and aluminum which is destined for recycling, not the re-refining process itself.

WAC 173-401-532(76)

Hydraulic and hydrostatic testing equipment.

WAC 173-401-532(77)

Batteries and battery charging.

WAC 173-401-532(79)

Solid waste (as defined in the Washington Administrative Code) containers.

WAC 173-401-532(83)

Humidity chambers.

WAC 173-401-532(86)

Totally enclosed conveyors.

WAC 173-401-532(87)

Steam vents and safety relief valves.

WAC 173-401-532(88)

Air compressors, pneumatically operated equipment, systems and hand tools.

WAC 173-401-532(89)

Steam leaks.

WAC 173-401-532(90)

Recovery boiler blow-down tank.

WAC 173-401-532(94)

Process water and white water storage tanks.

WAC 173-401-532(95)

Demineralizer tanks.

WAC 173-401-532(96)

Clean condensate tanks.

WAC 173-401-532(108)  
Vacuum systems exhausts.

WAC 173-401-532(112)  
Chipping.

WAC 173-401-532(113)  
Debarking.

WAC 173-401-532(114)  
Sludge dewatering and handling.

WAC 173-401-532(116)  
Pond dredging.

WAC 173-401-532(118)  
Non-PCB oil filled circuit breakers, oil filled transformers and other equipment that is analogous to, but not considered to be, a tank.

WAC 173-401-532(119)  
Electric or steam-heated drying ovens and autoclaves.

WAC 173-401-532(120)  
Sewer manholes, junction boxes, sumps and lift stations associated with wastewater treatment systems.

WAC 173-401-532(121)  
Water cooling towers processing exclusively non-contact cooling water.

## Attachment 3- RELEVANT REQUIREMENTS DETERMINED INAPPLICABLE OR EXEMPT

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

Requirement	Emissions Unit	Exempt or Inapplicable	Brief Description of Requirement	Basis
WAC 173-400-100	Facility	Inapplicable	Registration required for listed sources, excluding sources subject to the operating permit program, after EPA grants interim or final approval to the state program	Only applies in counties without a local authority. Also, the facility is subject to the operating permit program.
WAC 173-400-040(3)(b)	Facility	Inapplicable	Emission unit identified as a significant contributor to non-attainment must use reasonable and available control methods to control emission of contaminants for which the area is designated non-attainment.	No emission units at the facility have been identified as a significant contributor to non-attainment.
WAC 173-400-040(8)(b)	Facility	Inapplicable	Fugitive dust sources identified as significant contributors to PM10 non-attainment must apply RACT.	The facility is not located in a PM10 non-attainment area.
WAC 173-435	Facility	Inapplicable	Emergency episode plan requirements	The facility has not been requested to prepare such a plan.
40 CFR Part 68	Facility	Inapplicable	Risk Management Programs	40 CFR Part 68 applies to any facility that has more than a threshold quantity of a regulated substance in a process, as determined under §68.115. Simpson does not use or store any materials above the threshold quantities listed in 40 CFR Part 68.
WAC 173-401-635	Facility	Inapplicable	No "affected source" as defined in WAC 173-401-200(1) shall be permitted as a temporary source [WAC 173-401-635].	WAC 173-401-635 provides that the permitting authority may issue a single AOP authorizing emissions from similar operations at multiple

Requirement	Emissions Unit	Exempt or Inapplicable	Brief Description of Requirement	Basis
				temporary locations, except for “affected sources.” Since this permit is for a single location, this provision does not apply.
40 CFR Part 98 Mandatory Greenhouse Gas Reporting (Federal)	Facility	Not an applicable requirement under the state and federal Clean Air Acts	<b>Federal Mandatory Greenhouse Gas Reporting Rule.</b> Establishes requirements for reporting emissions of GHGs.	These requirements are not pursuant to either the state or federal Clean Air Acts and, therefore, are not “Applicable Requirements” for purposes of Title V.
40 CFR Part 63, Subpart JJJJJJ	Package Boiler (EU3)	Exempt	National Emission Standards for Hazardous Air Pollutants at Area Sources: Industrial, Commercial, and Institutional Boilers (Area Source Boiler Rule)	Per condition 4.3 of the Final Determination for NOC 11NOC869, the package boiler can only combust natural gas or propane.



## Attachment 4 - Data Summary

Name: Simpson Door Company - McCleary

Physical address: 400 Simpson Ave McCleary WA, 98557

County: Mason

Primary Contact: Kert Brown

Contact phone number: (360) 495-3291

Air Operation Permit #: 22AOP1559

EIS #: 7502911

FRS #: 110001916357

ICIS-AIR #: WAORC0005302700006

Type of ownership: Private

Operating status: Operating

NAICS code: 321911

SIC code(s): 2431

Air program(s): Title V

Federal Regulations:

-40 CFR Part 60, Subpart A – General Provisions

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

-40 CFR Part 63, Subpart A – General Provisions

-40 CFR Part 63, Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Major for which pollutant(s)? PM<sub>10</sub>, PM<sub>2.5</sub>