



SIMPSON DOOR COMPANY TECHNICAL SUPPORT DOCUMENT

**Olympic Region Clean Air Agency
2940 B Limited Lane NW
Olympia, WA 98502
(360) 539-7610 or 1-800-422-5623**

SIMPSON DOOR COMPANY McCLEARY FACILITY

PERMIT NO:	09AOP117
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PERMITTEE & MAILING ADDRESS:	Simpson Door Company 400 Simpson Avenue McCleary, WA 98557
FACILITY LOCATION:	400 Simpson Avenue McCleary, WA 98557
FACILITY DESCRIPTION:	Wood Door Manufacturing Facility
ORCAA File #:	1114
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1.0 DISCLAIMER

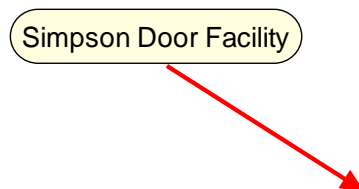
Information contained in this Technical Support Document and Statement of Basis is for purposes of background information only and is not enforceable. Applicable requirements including emission limits and monitoring, recordkeeping and reporting requirements are contained in the Air Operating Permit (AOP)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

2.0 PROCESS DESCRIPTIONS

2.1 Facility Overview

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

Figure 1: Simpson Door Location



2.2 Yard

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

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

Simpson Door’s twelve dry kilns are considered collectively as emissions unit #4. They are all indirect, steam heated kilns that are heated with steam from the package boiler. Each kiln is approximately 16’ by 140’ by 12’ high with a capacity of 100,000 board feet per charge. Emissions from the dry kilns consist of volatile organics and water vapor driven off from the wood itself. Among the volatile organics emitted are the compounds phenol and turpentine. Turpentine and phenol are both regulated as a toxic air pollutants (TAPs) under Washington’s regulations for new air toxic sources (Chapter 173-460 WAC). In addition, phenol is a regulated hazardous air pollutant (HAP) under the federal Clean Air Act.

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

2.3 Cutting

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

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

2.4 Door Department

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

After assembly, all of the doors receiving glass are first glazed and then sanded, while all of the panel doors go directly to the sander. After sanding, the doors are pre-fit to height and width. Every door is then inspected by a patcher, who repairs any defects before the door is packaged, banded and readied for shipment.

3.0 EMISSIONS UNIT DESCRIPTIONS

The following discussions and tables describe emissions units at Simpson Door. Table 3.1 provides a summary list of emissions units. Emissions units at Simpson Door are defined broadly in order to provide the maximum amount of flexibility with respect to permit revisions.

Simpson Door includes many emissions units that qualify as Insignificant Emissions Units (IEUs) under the provisions for IEUs in WAC 173-401-530. Pursuant to Title V of the Clean Air Act, Chapter 173-401 WAC exempts IEUs from Title V monitoring, record keeping and reporting requirements. Though Simpson Door is required to assure IEUs comply with applicable air requirements, additional monitoring, record keeping and reporting obligations imposed pursuant to Title V are not required for 4 IEUs. Table 3.2 lists emissions units located at Simpson Door that qualify as IEUs based either on the size of the unit or the unit's emissions rate. In addition to these, Simpson Door has emissions units that qualify categorically as IEUs. Since "categorical" IEUs are numerous, they are not explicitly identified in either Simpson's permit or this TSD. Please refer to WAC 173-401-532 for a complete list of the categorically exempt IEUs.

TABLE 3.1: EMISSIONS UNIT SUMMARY

Emission s unit ID#	Description	Exhaust Point ID#	Control Equipment
EU1	The wood boiler has been permanently decommissioned.	N/A	N/A
EU2	Wood Residuals Transport Systems: Particulate emissions from all cyclones serving mill operations such as wood cutting, slicing, planing, sanding, and milling operations.	see Tables 3.3 and 3.4 below	See Tables 3.3 and 3.4 below
EU3	Package Boiler: 14.7 MMBtu/hr heat input rate 12,100 lbs/hr of steam at 200 psi. Fuels: natural gas and propane	#03 Package Boiler Stack	None
EU4	Lumber Dry Kilns: 12 steam-heated, double-track lumber dry kilns (16' x 140' x 12' ht) with approximately 100,000 board-feet per kiln charge capacity for each kiln.	vents	None

TABLE 3.2. IEUs BASED ON SIZE OR INSIGNIFICANT EMISSION RATES

IEU	Location	Capacity	Basis for IEU Designation
Adhesive Application	Plant-wide	See maximum material usage estimates below in Table 3.3	WAC 173-401-530(1)(a)
Veneer Dryer	Veneer cutting building	not applicable	WAC 173-401-530(4)
Product Off-Gassing	Product warehouse	not applicable	WAC 173-401-530(d)
Grinding room baghouse	Grinding room	not applicable	WAC 173-401-530(4)(e) or 532(55)
Shop table saw cyclone	Shop	not applicable	WAC 173-401-532(46)
Storage Tank	Glue-cutting	6000 gallons	WAC 173-401-533(2)(a)
Storage Tank	Glue wash water-cutting	500 gallons	WAC 173-401-533(2)(a)
Storage Tank	Glue wash water-cutting	1000 gallons	WAC 173-401-533(2)(a)
Storage Tank	Glue wash water-cutting	1000 gallons	WAC 173-401-533(2)(a)
Welding	Shop	not applicable	WAC 173-401-533(2)(i) or -532(55)
Fuel and propane storage tanks	Near package boiler	10,000 gallon	WAC 173-401-533(2)(c)&(d)
Fuel and propane storage tanks	Aux. boiler diesel - discontinued	5000 gallons	WAC 173-401-533(2)(c)&(d)
Fuel and propane storage tanks	Gas tank-oil house	500 gallons	WAC 173-401-533(2)(c)&(d)
Fuel and propane storage tanks	Diesel tank-oil house	500 gallons	WAC 173-401-533(2)(c)&(d)
Fuel and propane storage tanks	Diesel tank-powerhouse generator	300 gallons	WAC 173-401-533(2)(c)&(d)
Fuel and propane storage tanks	Diesel tank-pumphouse pump	300 gallons	WAC 173-401-533(2)(c)&(d)
Fuel and propane storage tanks	Propane tank-fueling station	1000 gallons	WAC 173-401-533(2)(c)&(d)
Emergency generators and pumps	Pumphouse, diesel pump	1500 gpm	WAC 173-401-530(12)(1)(a)
Emergency generators and pumps	Powerhouse, diesel generator	250 KVA	WAC 173-401-530(12)(1)(a)

TABLE 3.3. POTENTIAL EMISSIONS FROM ADHESIVE APPLICATION¹

Material Name (ID#)	Maximum Annual Usage ² : (gal/yr)	Hazardous/Toxic Air Pollutant	Potential to Emit (tons/yr)		WAC 173-401-530(1)(a) Threshold
Emulsion Adhesive (XB-9325 LFF)	80,352	None	--		--
Aluminum Chloride Catalyst (M-318-LY)	1,942	None	--		--
Liquid UF Resin (CR5H)	286	Formaldehyde	0.08	0.084	0.5
Splicing Adhesive (Giral NH 10/23)	136	Formaldehyde	0.004		
UF Resin Catalyst (FM-132-B)	72	None	--		--
PTSA Catalyst Wonderboard (35-188)	390	None	--		--
Liq. PVA Adhesive – Cascortez 1B-32 Borden (16-S32)	1,562	None	--		--
Purebond (142-931A)	32	4,4 Dephenyl Methane Diisocyanate	0.06		0.1

1. Potential emissions provided in Simpson Door’s AOP renewal application.
2. According to renewal application, maximum annual usage rates were derived from 2016 annual usage and hours of operation.

3.1 Hog Fuel Boiler (Decommissioned)

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

3.2 Residual Handling (EU2)

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

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

Tables 3.4 and 3.5 identify primary units in the residuals system (EU2).

TABLE 3.4 ACTIVE CYCLONES

Cyclone ID	Design CFM	Serves	Type material collected	Fate of Catch	Exhaust to
C-2(planer)	42000	Cutting	Dry sawdust/shavings	C-6	Atmosphere
C-3(BEG)	15000	Cutting	Dry sawdust/shavings	C-6	Atmosphere
C-4(hog)	1000	Cutting	Dry Hog fuel	C-6	Atmosphere
C-5(cutline)	12000	Cutting	Dry Sawdust	C-6	Atmosphere
C-6(dust house)	30000	Cutting	Dry Sawdust/hog fuel/shavings/sander dust	Dust house or Atlas	Baghouse #2
C-7(sander)	36000	Cutting	Dry Sander dust/sawdust	C-7, to C-6	Baghouse #1
C-8(Stickers)	12000	Cutting	Dry Sawdust	C-6	Atmosphere
C-9(CEG)	6000	Cutting	Dry Sawdust	C-3	Atmosphere
C-10(System 1A)	45000	Door	Dry Sawdust/sander dust	Atlas	Baghouse #8 (formerly 1A)

C-11(system 1B)	45000	Door	Dry Sawdust	Atlas	Baghouse #7 (formerly 1B)
C-12(system 2A)	45000	Door	Dry Sawdust	Atlas	Baghouse #4 (formerly 2A)
C-13(system 2B)	45000	Door	Dry Sawdust/hog fuel	Atlas	Baghouse #3 (formerly 2B)
C-14(Truck Loadout baghouse).	12000	Truck Loadout	Dry Sawdust	Atlas	Baghouse #5
C-15(Atlas Baghouse)	30000	Atlas Dust Bin	Dry Sawdust	Atlas	Baghouse #6
C-16 (Sawdust Bin filter unit)	12,000 cfm	all	DECOMMISSIONED Sawdust and sander dust	Sawdust Bin	Sawdust Bin Filter Unit

TABLE 3.5 BAGHOUSES AND FILTER UNITS

Baghouse ID	Design CFM	Controls	Operating pressure drop	Fate of baghouse catch	Schedule for bag change
Baghouse 1	12000	Exhaust of C7	.1 to 4 inches	Re-intro to C7	2 years or as necessary
Baghouse2	12000	Exhaust of C6, catch of C7	.1 to 4 inches	Re-intro to C6	2 years or as necessary
Baghouse 6	30000	Exhaust of Atlas	.1 to 4 inches	Re-intro to C15	2 years or as necessary
Baghouse 5	12000	Exhaust of Truck Loadout	.1-4 inches	Re-intro to C14	2 years or as necessary
Baghouse 8	45000	Exhaust of C10	.1 to 4 inches	Re-intro to C10	2 years or as necessary
Baghouse 7	45000	Exhaust of C11	.1 to 4 inches	Re-intro to C11	2 years or as necessary
Baghouse 4	45000	Exhaust of C12	.1 to 4 inches	Re-intro to C12	2 years or as necessary
Baghouse 3	45000	Exhaust of C13	.1 to 4 inches	Re-intro to C13	2 years or as necessary
Sawdust Bin Filter Unit	12,000	All dust collection systems	.1 to 5 inches	DECOMMISSIONED Sawdust Bin	Equipped with cartridge filters

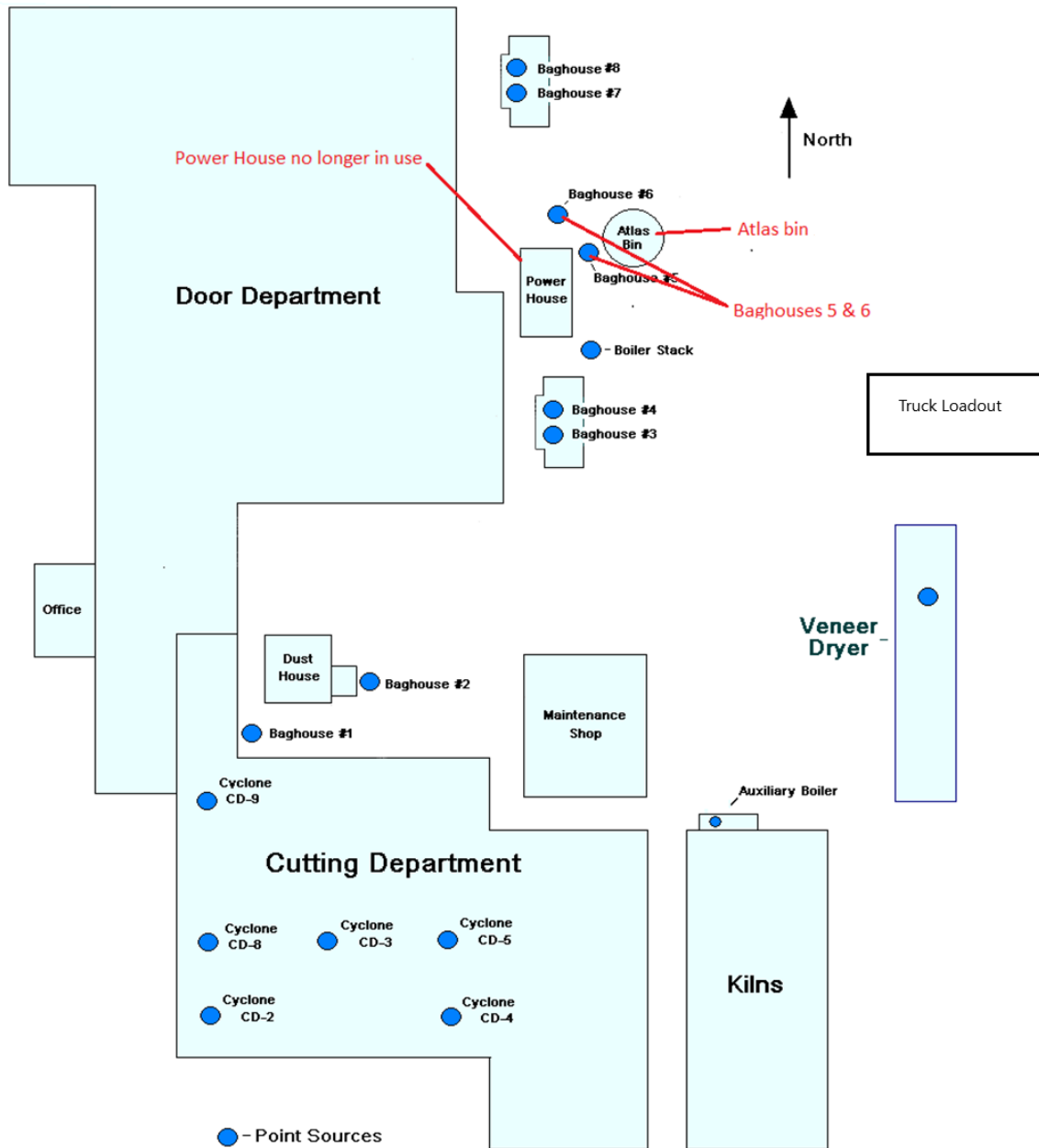
3.3 Package Boiler (EU3)

Simpson's package boiler is designated as emissions unit #3 (EU3) in Simpson's AOP. The unit is a 1990 Johnston 350 horsepower boiler rated at 12,100 lbs/hour at 200 psi steam, and a maximum heat input rate is 14.7 MMBtu/hour. It was installed June 7, 1996 for the purpose of augmenting steam production during the winter months. It was originally designed to run on either natural gas or diesel. It was modified in 2012 to run exclusively on natural gas and propane. The package boiler stack height is 32 feet. It is equipped with low-NO_x burners.

3.4 Lumber Dry Kilns (EU4)

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

Figure 3: Emission Unit Locations



4.0 ACTUAL AND POTENTIAL EMISSIONS

Data presented in Table 4.1 below is from ORCAA’s 2016 Annual Emission Inventory. ORCAA’s annual emissions inventory is compiled by ORCAA staff based on actual operating data provided by each regulated source. Annual actual emissions will vary from year to year based on operational conditions at the facility. The actual emissions reflect the actual materials used and production quantities that occurred during 2016.

Data presented below in Table 4.2 reflects Simpson Door’s maximum potential to emit (PTE). PTE was estimated based on the maximum capabilities of equipment and processes and other physical and regulatory limitations.

TABLE 4.1: 2016 ACTUAL EMISSIONS

Pollutant	2016 Actual Emissions (tons) ¹	2016 Actual Emissions (pounds) ¹	Source of Data
Particulate Matter (PM)	78		ORCAA Inventory
Particulate Matter (PM ₁₀) - particulate matter with an aerodynamic diameter less than 10 micrometers.	31		
Fine Particulate Matter (PM _{2.5}) - particulate matter with an aerodynamic diameter less than 2.5 micrometers.	31		
Oxides of Nitrogen (NO _x)	1.6		
Sulfur Dioxide (SO ₂)	1		
Carbon Monoxide (CO)	0.9		
Volatile Organic Compounds (VOC)	0.2		
Acetaldehyde		0.0	
Acrolein		0.0	
Formaldehyde		40	
Methanol		0.0	
Methylene diphenyl diisocyanate (MDI)		20	
Propionaldehyde		0.0	
Total Hazardous Air Pollutants (HAPs)	0.03		
Greenhouse Gases GHG ²	5397		

¹Calculated by ORCAA based on ORCAA approved emission factors and actual operating data from SIMPSON DOOR for 2016.

²GHGs are in metric tons CO_{2e} and reflect 2010 actual emissions.

TABLE 4.2: POTENTIAL TO EMIT (PTE)

Pollutant	PTE (tons)	Source of Data
Particulate Matter (PM)	167	Simpson Door
Fine Particulate Matter (PM ₁₀) - particulate matter with an aerodynamic diameter less than 10 micrometers.	96	
Oxides of Nitrogen (NO _x)	99	
Sulfur Dioxide (SO ₂)	8	
Carbon Monoxide (CO)	16	
Volatile Organic Compounds (VOC)	11	
Total Hazardous Air Pollutants (HAPs)	5	
Greenhouse Gases GHG ²	44781	

¹Calculated by ORCAA based on ORCAA approved emission factors and actual operating data from SIMPSON DOOR for 2016.

²GHGs are in metric tonnes CO_{2e}.

5.0 REGULATORY DETERMINATIONS

5.1 40 CFR Part 60 - New Source Performance Standards (NSPS)

EPA has established New Source Performance Standards (NSPS) for new, modified or reconstructed facilities and source categories emitting criteria air pollutants. NSPS are codified in 40 CFR Part 60. The following sections detail regulatory determinations for those regulations, referred to as “Subparts,” from 40 CFR Part 60 that are relevant to the Simpson Door facility.

5.1.1 40 CFR Part 60, Subpart Dc – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

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

Wood Fired Boiler (EU1)

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

Package Boiler (EU3)

Simpson Door’s package boiler (EU3) has a heat input rate within this applicable size range and was constructed (installed) in June of 1996, which is after the effective date of the NSPS. Therefore, EU3 is subject to the requirements of Subpart Dc. The boiler was modified in 2012 to burn only natural gas or propane. Table 5.1 below lists all requirements from 40 CFR Part 60 Dc that apply to EU3 and shows the corresponding AOP condition incorporating each requirement.

TABLE 5.1: 40 CFR Part 60, Subpart Dc (and A) Requirements Applying to Package Boiler (EU3)

CITATION	REQUIREMENT	APPLICABLE?	CONDITION
§60.40c	Applicability: a) Except as provided in paragraphs (d), (e), (f), and (g) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr).	No applicable requirements in this subsection.	N/A
§60.41c	§ 60.41c Definitions. As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act and in subpart A of this part.	No applicable requirements in this subsection.	N/A
§60.42c, (a)-(c)	§ 60.42c Standard for sulfur dioxide (SO ₂). Standards for affected facilities burning coal.	No – EU3 combusts only natural gas or propane.	N/A

Table 5.1 Continued

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

Table 5.1 Continued

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

Table 5.1 Continued

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

5.1.2 40 CFR Part 60, Subpart A – General Provisions

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

to Subpart Dc, requirements from Subpart A also apply and are worked into Simpson Door’s AOP.

Only those requirements from Subpart A that apply to Simpson Door on an ongoing basis are incorporated into their AOP. Requirements that apply when triggered by any new action such as construction of a new “affected facility,” one time requirements with past due dates such as initial notification requirements, requirements applying to the regulatory agency and requirements for specific types of monitoring equipment that are not used at the facility are not are not incorporated into the AOP. However, the fact that these requirements were not included in the AOP does not exempt Simpson Door from the requirement if they are triggered by some future action. Table 5.2 below lists all requirements from 40 CFR Part 60 A that apply to the package boiler (EU3) and shows the corresponding AOP condition incorporating each requirement.

TABLE 5.2: Subpart A Requirements Applying to Package Boiler

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

CITATION	REQUIREMENT	APPLICABLE?	CONDITION
§60.7(b)	§60.7 Notification and Record Keeping (b) Any owner or operator subject to the provisions of this part shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.	Yes	RK15
§60.7, (c)-(d)	§60.7 Notification and Record Keeping (c)-(d) Each owner or operator required to install a continuous monitoring device shall submit ...	No - EU3 not required to install a continuous monitoring device per 40 CFR Part 60.	N/A
§60.7, (e)	§60.7 Notification and Record Keeping (e) Notwithstanding the frequency of reporting requirements specified in paragraph (c) of this section, an owner or operator who is required by an applicable subpart to submit excess emissions and monitoring systems performance reports (and summary reports) on a quarterly (or more frequent) basis may reduce the frequency of reporting for that standard to semiannual if the following conditions are met:	No – Excess emissions and monitoring systems performance reports not required.	N/A
§60.7, (f)	§60.7 Notification and Record Keeping f) Any owner or operator subject to the provisions of this part shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements;	No – EU3 subject to only work practice standards of 40 CFR Part 60, not emissions limits.	N/A
§60.7, (g)	§60.7 Notification and Record Keeping (g) If notification substantially similar to that in paragraph (a) of this section is required by any other State or local agency, sending the Administrator a copy of that notification will satisfy the requirements of paragraph (a) of this section.	No - EU3 is not subject to any of the notification requirements of §60.7(a).	N/A
§60.7, (h)	§60.7 Notification and Record Keeping (h) Individual subparts of this part may include specific provisions which clarify or make inapplicable the provisions set forth in this section.	No applicable requirements	N/A
§60.8 Entire section	§60.8 Performance tests	No - EU3 not subject to any performance testing under 40 CFR Part 60.	N/A
§60.9 Entire section	§60.9 Availability of Information The availability to the public of information provided to, or otherwise obtained by, the Administrator under this part shall be governed by part 2 of this chapter. (Information submitted voluntarily to the Administrator for the purposes of §§60.5 and 60.6 is governed by §§2.201 through 2.213 of this chapter and not by §2.301 of this chapter.)	No requirements that apply to EU3.	N/A
§60.10 Entire section	§60.10 State Authority The provisions of this part shall not be construed in any manner to preclude any State or political subdivision thereof from...	No applicable requirements.	N/A
§60.11(a)-(c)	§60.11(a)-(c) includes compliance requirements for affected facilities subject to an opacity standard	No – EU3 not subject to an opacity	N/A

CITATION	REQUIREMENT	APPLICABLE?	CONDITION
		standard under 40 CFR Part 60.	
§60.11(d)	§60.11(d): General duty to minimize emissions.	Yes	AR20
§60.11(e)-(g)	§60.11(e)-(g) includes general compliance demonstration requirements for affected facilities subject to an emissions limit from 40 CFR Part 60.	No – EU3 only subject to work practice standards under 40 CFR Part 60, not emissions limits.	N/A
§60.12 Entire section	Circumvention prohibited.	Yes	G12
§60.13 Entire section	§60.13 Monitoring Requirements	No – EU3 only subject to work practice standards under 40 CFR Part 60, not emissions limits.	G12
§60.14 - §60.17	§60.14 Modification §60.15 Reconstruction §60.16 Priority List §60.17 Incorporations by reference	No ongoing applicable requirements applying to EU3.	N/A
§60.18 Entire section	§60.18 General Control Device and Work Practice Requirements	No ongoing requirements for EU3.	N/A
§60.19 (a)	§60.19 General Notification and Reporting Requirements Contains administrative requirements and clarifications for reporting.	No ongoing requirements for EU3.	N/A

5.1.3 40 CFR Part 60, Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

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

Package Boiler (EU3)

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

5.1.4 40 CFR Part 60, Subpart CCCC: Standards of Performance for Commercial and Industrial Solid Waste Incinerators

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

Package Boiler (EU3)

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

5.2 40 CFR Part 63 - National Emissions Standards for Hazardous Air Pollutants (NESHAP)

5.2.1 Boiler and Plywood MACT Standards

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

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

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

5.2.2 40 CFR Part 63, Subpart JJJJJ: Area Source Boiler MACT

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

5.3 Federal Compliance Assurance Monitoring (CAM) Rule

The CAM rule under 40 CFR Part 64 applies to air pollution control devices on emissions units with uncontrolled emission rates greater than 100 tons per year of any pollutant subject to an

emissions limit or standard, other than generally applicable emissions limitations and standards. Simpson door does not include any such emissions units.

5.4 Federal Mandatory Greenhouse Gas Reporting Rule

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

5.5 Risk Management Program Requirements under 40 CFR Part 68

40 CFR Part 68 is pursuant to Section 112(r) of the Federal Clean Air Act, which calls for risk management plans at facilities that use hazardous substances. The requirements under 40 CFR Part 68 apply to facilities that use or store materials in quantities that might pose an immediate danger to human health or safety if there is an accidental release. However, based on their AOP renewal application, Simpson Door does not maintain significant quantities or use any of the regulated substances listed in Section 112(r) of the Federal Clean Air Act. Therefore the facility is not required to comply with any of the requirements of this Section.

5.6 Prevention of Significant Deterioration (PSD) under 40 CFR Part 52

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

5.7 State Carbon Dioxide Mitigation Program

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

5.8 State Greenhouse Gas (GHG) Reporting Rule

According to WAC 173-441-030(1), the State GHG Reporting Rule applies to industrial facilities that emit at least 10,000 metric tons per year of GHG in terms of carbon dioxide equivalents, including carbon dioxide from biofuels. Because Simpson Door can potentially emit this quantity of GHG, the State GHG Reporting Rule applies. Conditions P14, RK13 and R12 in the AOP cover all requirements of this regulation.

6.0 NOTICES OF CONSTRUCTION

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

Table 6.1: SUMMARY OF AIR REGULATORY HISTORY

NOC # (date)	NOC Approval Description	NOC condition # and description	Applicable?	AOP #
no number (6/23/72)	Approved: 1. New cyclone at powerhouse 2. New Micro-pulsair 100S-8-20 baghouse (15000 cfm) filter at Atlas Bin.	Unconditional	N/A	N/A
no number (9/15/75)	Approved new cyclone to serve to cutting plant	Unconditional	N/A	N/A
no number (11/19/76)	Limited information in NOC application - According to NOC Form 1, project involved installation of system to collect sawdust and shavings.	Unconditional	N/A	N/A
#156 (??/??/???)	Approved new cyclone (#48, 16,000 cfm) exhausting directly to the atmosphere.	Unconditional	N/A	N/A
#159 (1/21/77)	Approved two new baghouses (Aero-Vac filters, American Sheet Metal Inc., Model # Inv-104.17). Each unit rated at 25,500 cfm.	Unconditional	N/A	N/A
#219 (1/27/78)	Approved baghouse #43 and the "door treating line."	Unconditional	N/A	N/A
# 234 (6/15/78)	Approved door manufacturing operations. Limited information in NOC application. Form 1 states use of "mineral spirits."	Unconditional	N/A	N/A

Table 6.1 Continued

NOC # (date)	NOC Approval Description	NOC condition # and description	Applicable?	AOP #
#260 (1/9/79)	Approved baghouse #46 serving cyclones No. 30, 31 and 32 on Atlas Bin.	Unconditional	N/A	N/A
no number (1/25/79)	Approved baghouse #35 serving cyclone #35 over the dust building.	Unconditional	N/A	N/A
#331 (6/29/82)	Approved replacement of cyclone #39 serving planer and fingerjoint process.	Unconditional	N/A	N/A
97NOC014 (6/7/96)	Approved dual fuel package boiler (EU3)	1. Completion Notice	Not an ongoing applicable requirement.	N/A
		2. Technical Specifications	Not an ongoing applicable requirement.	N/A
		3. Boiler Particulate Limit	Applicable Requirement	AR15
		4. Boiler Opacity Limit	Applicable Requirement	AR16
		5. Boiler Fuel Standards	Superseded by 11NOC869 Condition 4a	N/A
		6. NO _x Limit	Applicable Requirement	AR17
		7. CO Limit	Applicable Requirement	AR18
		8. Operations and Maintenance Plan	Applicable Requirement	AR21
		9. Requires reporting in accordance with Title V AOP.	Redundant Applicable Requirement	N/A
		10. Excess Emissions Reporting	Applicable Requirement	R5(c)
		11. General "duty to comply" requirement.	Redundant requirement covered in the standard terms and conditions in Simpson's AOP	N/A
02NOC256 Exempt (7/22/2003)	ORCAA determined that the new veneer slicing and drying unit was exempt from NOC approval.	No conditions	N/A	N/A
05NOC430A Application withdrawn (6/16/2006)	Requested approval to evaporate glue waste-water in the existing hog fuel boiler.	NOC application withdrawn by Simpson since the project was cancelled	N/A	N/A
06NOC514 (12/19/2006)	Approved new hot press to apply medium density overlay (MDO) paper onto doors.	No conditions	N/A	N/A

Table 6.1 Continued

NOC # (date)	NOC Approval Description	NOC condition # and description	Applicable?	AOP #
11NOC869	Approved: 1. Sawdust Bin Baghouse 2. Package Boiler Modification 3. Decommissioning of Wood-Fired Boiler (3/28/2012)	1. Technical Specifications	Not an ongoing applicable requirement.	N/A
		2. Wood-fired boiler will be permanently decommissioned	Not an ongoing applicable requirement. ORCAA verified the wood fired boiler is disabled and cannot be fired.	N/A
		3. Sawdust Bin Specifications	Sawdust bin has been removed from the facility.	N/A
		4.a. The package boiler shall combust only natural gas or propane fuel.	Applicable Requirement	AR14
		4.b. Emissions shall be minimized by assuring proper combustion at all times the boiler is operating.	Applicable Requirement	AR19
		4.c. Emissions monitoring requirement	Applicable Requirement	M9
		4.d. Maintaining proper combustion	Applicable Requirement	AR20
		4.e. Monitoring equipment	Applicable Requirement	M9
		4.f. Corrective actions shall be initiated promptly	Applicable Requirement	AR20
		5.a. EU3 fuel records	Applicable Requirement	RK4
		5.b. EU3 operating concentrations for O ₂ , NO _x and CO	Applicable Requirement	RK4
		5.c. EU3 monitoring records	Applicable Requirement	RK4
		5.d. Baghouse maintenance records	Superseded by condition 3 of 16NOC1154	RK4
16NOC1154 (8/15/2016)	Approved replacement of the sawdust bin and associated baghouse (approved under 11NOC869) with a new sawdust storage and truck loading system. (8/15/2016)	1. Technical Specifications	Not an ongoing applicable requirement.	N/A
		2.a. The Atlas Bin shall vent through a fabric filter baghouse.	Applicable Requirement	AR11
		2.b. Visible emissions from the Atlas Bin baghouse shall not exceed five percent opacity.	Applicable Requirement	AR12
		3. The permittee shall maintain record of actions taken to maintain the Atlas Bin baghouse.	Applicable Requirement	RK5

7.0 STATEMENT OF BASIS

Information in the following table provides the regulatory basis for each permit condition.

TABLE 7.1: STATEMENT OF BASIS

CONDITION	REGULATORY BASIS
P1. Permit Duration	[Origin: WAC 173-401-610] [Authority: WAC 173-401-600(1)(b)]
P2. Federally Enforceable Requirements	[Origin WAC 173-401-625] [Authority: WAC 173-401-600(1)(b)]
P3. Compliance Maintenance	[Origin: WAC 173-401-630(3); WAC 173-401-510(2)(h)(iii)] [Authority: WAC 173-401-600(1)(b)]
P4. Standard Conditions	[Origin for a: WAC 173-401-620(2)(a)] [Origin for b: WAC 173-401-620(2)(b)] [Origin for c: WAC 173-401-620(2)(c)] [Origin for d: WAC 173-401-620(2)(d)] [Origin for e: WAC 173-401-620(2)(e)] [Origin for f: WAC 173-401-620(2)(f); ORCAA Rule 3.2] [Origin for g: WAC 173-401-620(2)(g)] [Origin for h: WAC 173-401-620(2)(h)] [Origin for i: WAC 173-401-620(2)(i)] [Origin for j: WAC 173-401-620(2)(j)] [Authority for all subconditions: WAC 173-401-620(2)]
P5. Duty to Supplement or Correct Application	[Origin: WAC 173-401-500(6)] [Authority: WAC 173-401-600(1)(b)]
P6. False or Misleading Statements	[Origin: WAC 173-400-105(6); and, ORCAA 7.2 (state/local only)] [Authority: WAC 173-401-600(1)(b)]
P7. Permit Renewal Application	[Origin: WAC 173-401-710(1)] [Authority: WAC 173-401-600(1)(b)]
P8. Permit Expiration – Application Shield	[Origin: WAC 173-401-710(3)] [Authority: WAC 173-401-600(1)(b)]
P9. Permit Revocation	[Origin: WAC 173-401-710(4)] [Authority: WAC 173-401-600(1)(b)]
P10. Reopening for Cause	[Origin: WAC 173-401-730] [Authority: WAC 173-401-600(1)(b)]
P11. Changes not Requiring Permit Revision/Off Permit Changes	[Origin: WAC 173-401-722; and, WAC 173-401-724] [Authority: WAC 173-401-600(1)(b)]
P12. Administrative Permit Amendments	[Origin: WAC 173-401-720] [Authority: WAC 173-401-600(1)(b)]
P13. Permit Modifications	[Origin: WAC 173-401-725] [Authority: WAC 173-401-600(1)(b)]
P14. Greenhouse Gas Reporting Fee	[Origin: WAC 173-441-110 (State only)] [Authority: WAC 173-401-600(1)(b)]
P15. Confidential Information	[Origin: WAC 173-401-500(5); ORCAA Rule 1.6 (local only); and, WAC 173-401-630(1)] [Authority: WAC 173-401-600(1)(b)]
P16. Credible Evidence	[Origin: 40 CFR 51.212; 40 CFR 52.12; and 40 CFR 52.33] [Authority: WAC 173-401-600(1)(a)]
P17. Emergency as Affirmative Defense	[Origin: WAC 173-401-645] [Authority: WAC 173-401-600(1)(b)]
P18. Unavoidable Excess Emissions Excused	[Origin: WAC 173-400-107(6); and, ORCAA 8.7(c) (local only)]

Table 7.1 Continued

CONDITION	REGULATORY BASIS
	[Authority: WAC 173-401-600(1)(b)]
P19. Certification	[Origin: WAC 173-401-520; WAC 173-401-615(3)(a); and, WAC 173-401-630(1)] [Authority: WAC 173-401-600(1)(b)]
G1. Inspection and Entry	[Origin: WAC 173-401-630(2)] [Authority: WAC 173-401-600(1)(b)]
G2. Access for Inspection	[Origin: ORCAA 1.5(e) (local only)] [Authority: WAC 173-401-600(1)(b)]
G3. Insignificant Emission Units	[Origin: WAC 173-401-530] [Authority: WAC 173-401-600(1)(b)]
G4. New Source Review	[Origin: ORCAA 6.1 (local only)] [Authority: WAC 173-401-600(1)(b)]
G5. Replacement or Substantial Alteration of Existing Control Equipment	[Origin: ORCAA 6.1.10 (local only)] [Authority: WAC 173-401-600(1)(b)]
G6. Temporary Sources	[Origin: WAC 173-401-635; and, ORCAA 6.1.1] [Authority: WAC 173-401-600(1)(b)]
G7. Demolition and Asbestos Projects	[Origin: ORCAA 6.3.2 (local only)] [Authority: WAC 173-401-600(1)(b)]
G8. Demolition and Renovation Projects	[Origin: 40 CFR Part 61, Subpart M] [Authority: WAC 173-401-600(1)(a)]
G9. Protection of Stratospheric Ozone	[Origin: 40 CFR Part 82, Subparts B & F] [Authority: WAC 173-401-600(1)(a)]
G10. Prohibition of Emissions Detrimental to Persons or Property	[Origin: WAC 173-400-040(6)(State/local only); and, ORCAA 7.6 (local only)] [Authority: WAC 173-401-600(1)(b)]
G11. Concealment and Masking Prohibited	[Origin: WAC 173-400-040(8) (State/local only); ORCAA 7.5 (local only)] [Authority: WAC 173-401-600(1)(b)]
G12. Circumvention	[Origin: 40 CFR 60.12] [Authority: WAC 173-401-600(1)(a)]
AR1. Fallout Prohibition	[Origin: WAC 173-400-040(3); and, ORCAA 8.3(e) (local only)] [Authority: WAC 173-401-600(1)(b)]
AR2. Odor Control	[Origin: WAC 173-400-040(5) (state only); and, ORCAA 8.5(a) (local only)] [Authority: WAC 173-401-600(1)(b)]
AR3. Odor Prohibition	[Origin: ORCAA 8.5(c) (local only)] [Authority: WAC 173-401-600(1)(b)]
AR4. Fugitive Emissions Control	[Origin: WAC 173-400-040(4)(a)] [Authority: WAC 173-401-600(1)(b)]
AR5. Fugitive Dust Control	[Origin: WAC 173-400-040(9)(a); and, ORCAA 8.3(c) (local only)] [Authority: WAC 173-401-600(1)(b)]
AR6. Requirement to Maintain Air Pollution Control (Plant-wide)	[Origin: ORCAA 8.8 (local only)] [Authority: WAC 173-401-600(1)(b)]
AR7. General Standards for Maximum Visual Emissions	[Origin: ORCAA 8.2 (local only); and, WAC 173-400-040(2)] [Authority: WAC 173-401-600(1)(b); and, WAC 173-401-605(1)]
AR8. Sulfur Dioxide	[Origin: WAC 173-400-040(7)] [Authority: WAC 173-401-600(1)(b); and, WAC 173-401-605(1)]
AR9. General Particulate Standards for Combustion	[Origin: WAC 173-400-050(1); and, ORCAA 8.3(a) (local only)] [Authority: WAC 173-401-600(1)(b); and, WAC 173-401-605(1)]
AR10. General Emission Standards for Process Units	[Origin: WAC 173-400-060; and, ORCAA 8.3(a) (local only)] [Authority: WAC 173-401-600(1)(b); and, WAC 173-401-605(1)]
AR11 Atlas Bin (EU2)	[Origin: 16NOC1154, condition 2a]

Table 7.1 Continued

CONDITION	REGULATORY BASIS
	[Authority: WAC 173-401-600(1)(c)]
AR12. Atlas Bin Opacity Limit (EU2)	[Origin: 16NOC1154, condition 2b] [Authority: WAC 173-401-600(1)(c)]
AR13. Requirement to Maintain Air Pollution Control (EU2)	[Origin: ORCAA 8.8 (local only)] [Authority: WAC 173-401-600(1)(b)] [Authority for Specific Provisions: WAC 173-401-600(1) and (2)]
AR14. EU3 Fuel Standards	[Origin: 11NOC0869, condition #4a (as approved 3/28/2012)] [Authority: WAC 173-401-600(1)(c)]
AR15. EU3 Particulate Limit	[Origin: 97NOC014, condition #3 (as approved 6/7/1996)] [Authority: WAC 173-401-600(1)(c)]
AR16. EU3 Opacity Limit	[Origin: 97NOC014, condition #4 (as approved 6/7/1996)] [Authority: WAC 173-401-600(1)(c)]
AR17. EU3 NOx Limit	[Origin: 97NOC014, condition #6 (as approved 6/7/1996)] [Authority: WAC 173-401-600(1)(c)]
AR18. EU3 CO Limit	[Origin: 97NOC014, condition #7 (as approved 6/7/1996)] [Authority: WAC 173-401-600(1)(c)]
AR19. Requirement to Minimize Emissions from Boiler (EU3)	[Origin: 40 CFR 60.11(d); 11NOC869, condition 4b] [Authority: WAC 173-401-600(1)(a)]
AR20. ORCAA Requirement to Maintain Air Pollution Control (EU3)	[Origin: ORCAA 8.8 (local only); 11NOC869 conditions 4d and 4f] [Authority: WAC 173-401-600(1)(b)] [Authority for Specific Provisions: WAC 173-401-600(1) and (2)]
AR21. EU3 Operation and Maintenance Plan	[Origin: 97NOC014, condition #8 (as approved 3/28/2012)] [Authority: WAC 173-401-600(1)(c)]
M1. Plant-wide Opacity Surveys	[Origin: N/A - gap filling monitoring] [Authority: WAC 173-401-615(1)(b)]
M2. Certified Opacity Reading Required	[Origin: N/A - gap filling monitoring] [Authority: WAC 173-401-615(1)(b)]
M3. Certified Opacity Reading Procedures	[Origin: N/A - gap filling monitoring] [Authority: WAC 173-401-615(1)(b)]
M4. Monitoring Air Impacts Detrimental or a Nuisance to Persons or Property	[Origin: N/A - gap filling monitoring] [Authority: WAC 173-401-615(1)(b)]
M5. Fugitive Emissions, Odors and Dust Control Monitoring	[Origin: N/A - gap filling monitoring] [Authority: WAC 173-401-615(1)(b)]
M6. Sulfur Dioxide Emissions Monitoring	[Origin: N/A - gap filling monitoring] [Authority: WAC 173-401-615(1)(b)]
M7. Monitoring Actions to Maintain Air Pollution Control Technology	[Origin: N/A - gap filling monitoring] [Authority: WAC 173-401-615(1)(b)]
M8. Emissions Testing	[Origin for a: N/A - gap filling monitoring] [Origin for b: ORCAA 1.5(j)] [Origin for c: WAC 173-400-105(4)] [Origin for d: ORCAA 1.5(j)] [Origin for e: ORCAA 8.3(a)] [Origin for f: N/A - gap filling monitoring] [Origin for g: N/A - gap filling monitoring] [Authority for sub conditions a - g: WAC 173-401-615(1)(a)&(b)]
M9. Boiler Combustion Evaluation	[Origin: 11NOC869 conditions 4c and 4e] [Authority: WAC 173-401-615(1)(a)]
RK1. Retention and Availability of Records	[Origin: WAC 173-401-615(2)(c) and 40 CFR 60.48c(i)] [Authority: WAC 173-401-615(2)]
RK2. Record of Changes	[Origin: WAC 173-401-615 (2)(b), and WAC 173-401-724(5)] [Authority: WAC 173-401-615(2)]
RK3. Monitoring Records	[Origin: WAC 173-401-615 (2)(a)]

Table 7.1 Continued

CONDITION	REGULATORY BASIS
	[Authority: WAC 173-401-615(2)]
RK4. Package Boiler (EU3) Records	[Origin for a: 11NOC869, Condition 5a; 40 CFR 60.48c(g)] [Origin for b: 40 CFR 60.7(b)] [Origin for c: 11NOC869, Condition 5b] [Origin for d: 11NOC869, Condition 5c] [Origin for e: gap filling monitoring] [Authority for all: WAC 173-401-615(2); WAC 173-401-616(1)(b)]
RK5. Atlas Bin Baghouse Maintenance Records	[Origin: 16NOC1154, condition 3] [Authority: WAC 173-401-615(2)]
RK6. Record of Permit Deviations	[Origin: WAC 173-401-615(3)(b)] [Authority: WAC 173-401-615(2)]
RK7. Availability of Emissions Records	[Origin: ORCAA 8.11(a) (local only)] [Authority: WAC 173-401-615(2)]
RK8. Emissions Records	[Origin: WAC 173-400-105(1); ORCAA 8.11 (local only)] [Authority: WAC 173-401-615(2)]
RK9. Unlawful Reproduction or Alteration of Documents	[Origin: ORCAA 7.3 (local only)] [Authority: WAC 173-401-615(2)]
RK10. Display of Orders, Certificates and Other Notices	[Origin: ORCAA 7.4 (local only)] [Authority: WAC 173-401-615(2)]
RK11. Record of Complaints	[Origin: Condition M4] [Authority: WAC 173-401-615(2)]
RK12. MACT Applicability Records	[Origin: 40 CFR 63.1(b)(3); 40 CFR 63.10(b)(3)] [Authority: WAC 173-401-615(2)]
RK13. Material Composition Records	[Origin: Condition G10] [Authority: WAC 173-401-615(2)]
RK14. Records Required for Greenhouse Gas (GHG) Reporting	[Origin: WAC 173-441-050(6)(State only)] [Authority: WAC 173-401-615(2)]
R1. Certification of Reports	[Origin: WAC 173-401-630(1)] [Authority: WAC 173-401-615(3)]
R2. Annual Compliance Certification	[Origin: WAC 173-401-630(5)] [Authority: WAC 173-401-615(3)]
R3. Confidential Information	[Origin: ORCAA 1.6 (local only)] [Authority: WAC 173-401-615(3)]
R4. Simi-annual Monitoring Report	[Origin: WAC 173-401-615(a)] [Authority: WAC 173-401-615(3)]
R5. Reporting Deviations from Permit Conditions	[Origin for a: WAC 173-401-615(3)(b)] [Origin for b: WAC 173-401-615(3)(b)] [Origin for c: WAC 173-400-107(3); w/r EU3 97NOC014, condition 10] [Origin for d: WAC 173-401-645] [Authority for all: WAC 173-401-615(3)]
R6. Notification of Control Equipment Malfunction	[Origin: ORCAA 8.8 (local only)] [WAC 173-401-615(3)]
R7. Notification of Complaint Received	[Origin: Condition M3] [Authority: WAC 173-401-615(3)]
R8. Annual Inventory Report	[Origin: WAC 173-400-105(1), and ORCAA 8.11 (local only)] [Authority: WAC 173-401-615(3)]
R9. Combustion Evaluation Notification and Rescheduling	[Origin: Condition M9] [Authority: WAC 173-401-615(3) and WAC 173-401-630(1)]
R10. Stack Test Plans	[Origin: Condition M8] [Authority: WAC 173-401-615(3) and WAC 173-401-630(1)]
R11. Stack Test Reports	[Origin: M8] [Authority: WAC 173-401-615(3)]

Table 7.1 Continued

CONDITION	REGULATORY BASIS
R12. State Greenhouse Gas (GHG) Reporting	[Origin: Chapter 173-441 WAC (State only)] [Authority: WAC 173-401-615(3)]
R13. Addresses for Notifications and Reports	[Origin: N/A] [Authority: WAC 173-401-615(3)]
S1. Permit Shield	[WAC 173-401-640(1)]
S2. Inapplicable or Exempt Requirements	[WAC 173-401-640(2)]
S3. Exclusions	[WAC 173-401-640(4)]

ATTACHMENT 1: Facility Map

Figure 1. Facility Overview (not to scale)

