

January 10, 2005

David Like  
Hampton Lumber Mills, Inc.  
PO Box 8  
Willamina, OR 97396

Re: Issuance of Final Renewal Title V Air Operating Permit SW97-4-R1- Renewal

Dear Mr. Like:

No comments were received from the Environmental Protection Agency (EPA) during EPA's 45-day comment period for the "proposed" Title V permit for your facility; therefore the Southwest Clean Air Agency is pleased to issue the final Title V permit for your facility as proposed. This permit will be effective January 10, 2005 through January 10, 2010. Copies of the final Title V permit and Basis Statement are enclosed.

If you have any questions or comments, please contact me at (360) 574-3058 extension 29.

Sincerely,

Vannessa McClelland  
Air Quality Engineer

Attachments

**Hampton Lumber Mills - WA, Inc. - Randle Facility**

**Air Operating Permit**

**SW97-4-R1**

**Final Issued January 10, 2005**

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Southwest Clean Air Agency  
11815 NE 99 St., Ste 1294  
Vancouver, WA 98682  
Telephone: (360) 574-3058

AIR OPERATING PERMIT #: SW97-4-R1

ISSUED TO: Hampton Lumber Mills -  
WA Inc.  
10166 US Hwy 12  
Randle, WA 98377

PLANT SITE: Hampton Lumber Mills -  
WA Inc., Randle Facility  
10166 US Hwy 12  
Randle, WA 98377

NATURE OF BUSINESS: Saw mill  
SIC/NAICS CODE: 2421/321113  
AIRS NUMBER: 53-041-00009  
EFFECTIVE DATE: January 10, 2005  
EXPIRATION DATE: January 10, 2010  
RENEWAL APPLICATION DUE: July 10, 2009

PERMIT ENGINEER:

\_\_\_\_\_  
Vannessa McClelland, Air Quality Engineer

\_\_\_\_\_  
Date

REVIEWED BY:

\_\_\_\_\_  
Paul T. Mairose, Chief Engineer

\_\_\_\_\_  
Date

APPROVED BY:

\_\_\_\_\_  
Robert D. Elliott, Executive Director

\_\_\_\_\_  
Date

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## I. ABBREVIATIONS

### List of Common Abbreviations

ADP	Air Discharge Permit (aka Order of Approval)
AOP	Air Operating Permit
BACT	Best available control technology
BF	Board feet
CAM	Compliance Assurance Monitoring
CO	Carbon monoxide
CFR	Code of Federal Regulations
DOE	Washington Department of Ecology
EPA	U.S. Environmental Protection Agency
EU	Emission unit
EU#	Refers to a specific emission unit numbered "#"
FCAA	Federal Clean Air Act
G#	Refers to a specific general term and condition numbered "#"
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous air pollutant
IEU	Insignificant emission unit
IEU#	Insignificant emission unit numbered "#"
M#	Refers to a specific monitoring requirement numbered "#"
MSDS	Material safety data sheet
NR#	Nonapplicable requirement numbered "#"
NSR	New source review
NO <sub>x</sub>	Oxides of nitrogen
O <sub>2</sub>	Oxygen
PM	Particulate matter
PM <sub>10</sub>	Particulate matter less than 10 microns in diameter
PTE	Potential to emit
R#	Refers to a specific reporting requirement numbered "#"
RACT	Reasonably available control technology
RCW	Revised Code of Washington
Region 10	Region 10 of the U.S. Environmental Protection Agency
Req-#	Applicable requirement numbered "#"
SERP	Source Emission Reduction Plan
SO <sub>2</sub>	Sulfur dioxide
SIP	State implementation plan
SWCAA	Southwest Clean Air Agency
TAP	Toxic air pollutant
tpy	Tons per year
VOC	Volatile organic compound
WAC	Washington Administrative Code

Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations.

## II. REGULATORY BASIS

This Air Operating Permit (AOP) is authorized under the procedures established in WAC 173-401 and Title V of the 1990 Federal Clean Air Act Amendments. The terms and conditions of this permit describe the emission limitations, operating requirements, ambient monitoring, recordkeeping requirements, and reporting frequencies for the permitted source.

Permit terms and conditions are divided into the following categories: General Terms and Conditions, Operating Terms and Conditions, Monitoring Requirements, Recordkeeping Requirements, and Reporting Requirements. As used in this permit, there is no distinction between "terms" and "conditions." As such, "condition" shall mean the same as "terms and conditions" as referred to in Title V of the 1990 Federal Clean Air Act Amendments.

The conditions required under this permit are determined to be necessary to assure and provide for certification of compliance with applicable local, state, and federal air pollution regulations and standards. A comprehensive list of local, state, and federal air pollution regulations and standards that currently apply to emission units and other air pollution sources located at the permittee's facility is provided in Section V, "General Terms and Conditions." These regulations and standards were determined to be applicable based on the equipment specifications and regulatory history of each emission unit as described in the Statement of Basis for this permit.

## III. EMISSION UNIT IDENTIFICATION

<b>ID #</b>	<b>Generating Equipment/Activity</b>	<b>Emission Control</b>
EU-1	Log Yard	Water suppression
EU-2	Sawmill	One Sutorbilt green sawdust cyclone One Clarke's Sheet Metal cyclone/baghouse combination (BH1)
EU-3	Power House	One multi-clone/Zurn Air Systems wet venturi scrubber combination One settling pond
EU-4	Dry Kilns	None
EU-5	Filing Room	Two knock-out boxes
EU-6	Sap Stain System	Spray Technologies mist eliminator

## IV. PERMIT PROVISIONS

### P1. Standard Provisions WAC 173-401-620(2) - [11/4/93]

- (a) *Duty to comply.* The permittee must comply with all conditions of this Chapter 401 permit. Any permit noncompliance constitutes a violation of Revised Code of Washington (RCW) Chapter 70.94 and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- (b) *Need to halt or reduce activity not a defense.* It shall not be a defense for a 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.
- (c) *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 reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- (d) *Property rights.* This permit does not convey any property rights of any sort, or any exclusive privilege.
- (e) *Duty to provide information.* The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority 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 the permitting authority copies of records required to be kept by the permittee or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70.94.205.
- (f) *Permit fees.* The permittee shall pay fees as a condition of this permit in accordance with the permitting authority's fee schedule. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in RCW 70.94.430 and 70.94.431.
- (g) *Emissions trading.* No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
- (h) *Severability.* If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable.
- (i) *Permit appeals.* This permit or any conditions in it may be appealed only by filing an appeal with the Pollution Control Hearings Board and serving it on the permitting authority within thirty days of receipt of the permit pursuant to RCW 43.21B.310. This

provision for appeal in this section is separate from and additional to any federal rights to petition and review under §505(b) of the FCAA.

- (j) *Permit continuation.* This permit and all terms and conditions contained therein 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.

**P2. Duty to Supplement or Correct Application** WAC 173-401-500(6) - [10/17/02]

The permittee, upon becoming aware that relevant facts were omitted or incorrect information was submitted in a permit application, shall promptly submit such supplementary facts or corrected information. In addition, an applicant shall provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a draft permit.

**P3. Insignificant Emission Unit - Permit Revision** WAC 173-401-530(6) - [6/17/94]

Any emission unit or activity that qualifies as insignificant solely on the basis of provisions in WAC 173-401-530(1)(a) shall not exceed the emissions thresholds specified in WAC 173-401-530(4) until this permit is modified pursuant to WAC 173-401-725.

**P4. Permit Renewal and Expiration** WAC 173-401-610 - [11/4/93]  
WAC 173-401-710 - [10/17/02]

This permit shall be valid for a fixed term of 5 years. The permittee shall submit a complete permit renewal application to SWCAA no later than the date established in the permit. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with WAC 173-401-710(1). All terms and conditions of the permit shall remain in effect after the permit expires if a timely and complete permit application has been submitted. Operation under the terms and conditions of the expired permit will be allowed until SWCAA takes final action on the renewal application.

**P5. Emergency Provision** WAC 173-401-645 - [11/4/93]

An "emergency" as defined in WAC 173-401-645(1) shall constitute an affirmative defense to an action brought for noncompliance with technology based emission limitations if the conditions of WAC 173-401-645(3) are met. WAC 173-401-645(3)(d) requires that specific reporting requirements be met in order to qualify for the affirmative defense. Burden of proof lies with the permittee.

**P6. Reopenings for Cause** WAC 173-401-730 - [11/4/93]

This permit shall be reopened and revised under any of the following circumstances:

- (a) Additional applicable requirements become applicable to a major air operating permit source with a remaining permit term of 3 or more years. Such a reopening shall be completed not later than 18 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) The permitting authority or Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
- (d) The Administrator or the permitting authority 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 as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings under this section shall not be initiated before a notice of such intent is provided to the air operating permit source 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.

**P7. Confidentiality of Records and Information**

SWCAA 400-270 - [11/9/03 Local Only]

The permittee is responsible for clearly identifying information that is considered proprietary and confidential prior to submittal to SWCAA. Requests for proprietary and confidential information shall be released only after legal opinion by SWCAA's legal counsel, and notice to the permittee of the intent to release or deny the release of information.

**P8. Excess Emissions**

WAC 173-400-107 - [9/20/93]

SWCAA 400-107 - [9/21/95 SIP, 11/9/03 Local Only]

Excess emissions that the permittee wishes to be considered unavoidable must be reported as soon as possible, but no later than 48 hours after discovery. Excess emissions due to startup or shutdown conditions or due to scheduled maintenance shall be considered unavoidable provided the source reports as required under subsection (1) of SWCAA 400-107 and adequately demonstrates that the excess emissions could not have been prevented or avoided.

**V. GENERAL TERMS AND CONDITIONS**

**G1. Certification**

WAC 173-401-520 - [11/4/93]

All application forms, reports, and compliance certifications must be certified by a responsible official. Certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information contained in the submittal are true, accurate, and complete.

**G2. Inspection and Entry** WAC 173-401-630(2) - [11/4/93]

The permittee shall allow inspection and entry, upon presentation of credentials and other documents as may be required by law, by the permitting authority or an authorized representative to perform the following:

- (a) Enter upon the permittee's premises where an air operating permit source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) As authorized by SWCAA 400-105 and the FCAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

**G3. Compliance Requirements** WAC 173-401-630(3) - [11/4/93]

The permittee shall continue to comply with all applicable requirements with which the source is currently in compliance, and meet on a timely basis any applicable requirements that become effective during the permit term.

**G4. Transfer of Ownership or Operational Control** WAC 173-401-720 - [11/4/93]

A change in permittee due to transfer of ownership or operational control of an affected source requires a request for administrative permit amendment as governed by WAC 173-401-720.

- G5. New Source Review** WAC 173-400-110 - [9/20/93 SIP, 9/15/01 State Only]  
WAC 173-400-141 - [9/15/01 State Only]  
WAC 173-460 - [8/21/98 State Only]  
SWCAA 400-110 - [11/21/96 SIP, 11/9/03 Local Only]  
SWCAA 400-141 - [11/9/03 Local Only]

The permittee shall not construct or modify a source which is required to be reviewed under SWCAA 400-110 and/or -141 or WAC 173-460 without first receiving an approval or permit under such provisions. Portable sources may be exempt from this requirement if they fulfill the criteria described in G7.

**G6. Replacement or Substantial Alteration of Emission Control Technology at an Existing Stationary Source**

- WAC 173-400-114 - [9/15/01 State Only]  
SWCAA 400-114 - [11/21/96 SIP, 11/9/03 Local Only]

Prior to replacing or substantially altering emission control technology or equipment installed at an existing stationary source or emission unit, the permittee shall file an air discharge permit application with SWCAA. Construction shall not commence on a project subject to review until

SWCAA issues a final air discharge permit or other regulatory order. However, any air discharge permit application filed under this section shall be deemed to be approved without conditions if the Agency takes no action within thirty days of receipt of a complete application.

- G7. Portable Sources** WAC 173-400-035 - [9/15/01 State Only]  
WAC 173-110(5) - [9/20/93 SIP Only]  
SWCAA 400-110(5) - [11/21/96 SIP Only]  
SWCAA 400-110(6) - [11/9/03 Local Only]

Portable sources which locate temporarily at the site of air operating permit sources shall be allowed to operate at the temporary location without filing a Notice of Construction application provided that:

- (a) The source/emission units are registered with SWCAA;
- (b) The source/emission units have an Order of Approval to operate as a portable source;
- (c) The owner(s) or operator(s) notifies SWCAA of the intent to operate at the new location at least ten business days prior to starting the operation;
- (d) The owner(s) or operator(s) supplies sufficient information including production quantities and hours of operation, to enable SWCAA to determine that the operation will comply with the emission standards for a new source, and will not cause a violation of applicable ambient air quality standards and, if in a nonattainment area, will not interfere with scheduled attainment of ambient standards; and
- (e) The owner(s) and/or resident(s) of immediately adjacent properties shall be notified by the owner(s) or operator(s) of the portable source in writing at least 10 business days prior to commencement of operations at the proposed location with copies mailed to SWCAA. Written notification to the adjacent landowners/residents shall be by certified mail with return receipt requested. Such written notification shall include a complete description of the proposed operation, the associated emissions control provisions and equipment, the total estimated project emissions, the name, address and phone number of the person in charge of the operation, and the address and phone number for SWCAA. Written notification shall indicate that all comments shall be directed to SWCAA.

- G8. Outdoor Burning** WAC 173-425 - [10/18/90 SIP, 4/13/00 State Only]  
SWCAA 425 - [8/1/02 Local Only]

The permittee is prohibited from conducting outdoor burning except as allowed by SWCAA 425.

- G9. Asbestos** 40 CFR 61 Subpart M - [7/1/03]  
WAC 173-400-075 - [8/11/02 State Only]  
SWCAA 400-075 - [11/9/03 Local Only]  
SWCAA 476 - [11/9/03 Local Only]

The permittee shall comply with the provisions of SWCAA 476 when conducting any renovation or demolition activities at the facility.

**G10. Protection of Stratospheric Ozone** 40 CFR 82.150, Subparts B and F - [7/1/03]

The permittee shall comply with the standards for recycling and emissions reduction as provided in 40 CFR Part 82, Subparts B and F.

**G11. Misrepresentation and Tampering**

WAC 173-400-105(7 & 8) - [9/15/01 State Only]

SWCAA 400-105(6 & 7) - [11/9/03 Local Only]

- (a) The permittee shall not make any false material statement, representation or certification in any form, notice, or report.
- (b) The permittee shall not render inaccurate any monitoring device or method required under Chapter 70.04 RCW, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto.

**G12. Chemical Accident Prevention** 40 CFR 68 - [7/1/03]

The permittee shall comply with the requirements for preparation and implementation of a plan to address potential chemical releases as provided in 40 CFR 68.

**VI. OPERATING TERMS AND CONDITIONS**

The following table lists all federal, state, and/or locally enforceable requirements applicable to the permittee. The legal authority for each requirement is enclosed in brackets below each requirement. Applicable requirements identified as having "plantwide" applicability apply to both EUs and IEUs. Some of the requirements have been partially adopted into the Washington State Implementation Plan (SIP). Only those parts adopted into the Washington SIP are federally enforceable. Requirements which are not required under the FCAA are denoted as state or local only. Monitoring requirements are used to provide a reasonable assurance of compliance with the applicable requirements, and may or may not involve the use of a reference test method.

<b>Req. #</b>	<b>Requirement</b>	<b>Emission Point</b>	<b>Monitoring</b>	<b>Reference Test Method</b>
Req-1	Permittee shall not cause or permit any visible emissions which exceed 20% opacity for more than three minutes, in any one hour.  WAC 173-400-040(1)(a)&(b) - [9/20/93 SIP, 9/15/01 State Only] SWCAA 400-040(1)(a)&(b) - [9/21/95 SIP, 11/9/03 Local Only]	Plantwide	M1 Visible Emissions	Visible Emissions Evaluation; SW97-4-R1, SWCAA 400 Appendix A
Req-2	Permittee shall not cause or permit fallout of particulate matter beyond the source's property boundary in sufficient quantity to interfere unreasonably with the use and enjoyment of the property on which the fallout occurs.  WAC 173-400-040(2) - [9/20/93 State Only] SWCAA 400-040(2) - [11/9/03 Local Only]	Plantwide	M5 Complaint	N/A
Req-3	Permittee shall take reasonable precautions to prevent the release of fugitive emissions from any emission unit which is a source of fugitive emissions.  WAC 173-400-040(3)(a) - [9/20/93 SIP, 9/15/01 State Only] SWCAA 400-040(3)(a) - [9/15/95 SIP, 11/9/03 Local Only]	Plantwide	M4 Fugitive Emissions, M5 Complaint	N/A
Req-4	Permittee shall use recognized good practice and procedures to reduce odors to a reasonable minimum.  WAC 173-400-040(4) - [9/15/01 State Only] SWCAA 400-040(4) - [11/9/03 Local Only]	Plantwide	M5 Complaint	N/A
Req-5	Permittee shall not cause or permit emissions detrimental to persons or property.  [WAC 173-400-040(5) - [9/20/93 SIP, 9/15/01 State Only] SWCAA 400-040(5) - [9/21/95 SIP, 11/9/03 Local Only]	Plantwide	M5 Complaint	N/A

Req-6	<p>Permittee shall not cause or permit any emission unit to emit a gas containing sulfur dioxide in excess of 1,000 ppm of sulfur dioxide on a dry basis, based on an average of sixty consecutive minutes.</p> <p style="text-align: center;">WAC 173-400-040(6) - [9/15/01] SWCAA 400-040(6) - [11/9/03]</p> <p style="text-align: center;">Except second paragraphs of WAC 173-400-040(6) and SWCAA 400-040(6)(a)</p>	Plantwide	M7 SO <sub>2</sub> Emission Standard	EPA Method 6, 40 CFR 60, SWCAA 400 Appendix A, July, 1996
Req-7	<p>Permittee shall not cause or permit the installation or use of any means which conceals or masks an emission which would otherwise violate any provisions of SWCAA 400-040.</p> <p style="text-align: center;">WAC 173-400-040(7) - [9/20/93 SIP, 9/15/01 State Only] SWCAA 400-040(7) - [9/21/95 SIP, 11/9/03 Local Only]</p>	Plantwide	M6 Compliance Certification	N/A
Req-8	<p>Permittee shall take reasonable precautions to prevent emissions of fugitive dust and operate the source to minimize emissions.</p> <p style="text-align: center;">WAC 173-400-040(8)(a) - [9/20/93 SIP, 9/15/01 State Only] SWCAA 400-040(8)(a) - [9/21/95 SIP, 11/9/03 Local Only]</p>	Plantwide	M4 Fugitive Emissions, M5 Complaint	Visible Emissions Evaluation; SW97-4-R1, SWCAA 400 Appendix A
Req-9	<p>Permittee shall not cause or permit emissions of particulate matter from a combustion or incineration emission unit in excess of 0.1 gr/dscf of exhaust gas corrected to 7% oxygen. Permittee shall not cause or permit emissions of particulate matter from an emission unit combusting wood derived fuels in excess of 0.2 gr/dscf of exhaust gas corrected to 7% oxygen.</p> <p style="text-align: center;">WAC 173-400-050(1)&amp;(3) - [3/22/91 SIP, 9/15/01 State Only] SWCAA 400-050(1)&amp;(3) - [9/21/95 SIP, 11/9/03 Local Only]</p> <p style="text-align: center;">Oxygen level exclusion provision of WAC 173-400-050(3) - [3/22/91 State Only] Oxygen level exclusion provision of SWCAA 400-050(3) - [4/11/99 Local Only]</p>	Plantwide	M2 Particulate Matter, M14 Boiler Emissions Testing	EPA Method 5, 40 CFR 60, SWCAA 400 Appendix A, July, 1996
Req-10	<p>Permittee shall not cause or allow emissions of particulate matter from a general process unit (excludes combustion) in excess of 0.1 gr/dscf of exhaust gas.</p> <p style="text-align: center;">WAC 173-400-060 - [3/22/91 SIP, 9/15/01 State Only] SWCAA 400-060 - [9/21/95 SIP, 11/9/03 Local Only]</p>	Plantwide	M2 Particulate Matter, M3 Particulate Matter Emission Testing	EPA Method 5, 40 CFR 60, SWCAA 400 Appendix A, July, 1996

Req-11	Permittee shall not cause or permit any visible emissions from operation of the Seattle Iron Works boiler which exceeds fifteen percent (15%) opacity for more than 3 minutes in any one hour period.  SWCAA 02-2414, Section 18.c - [6/17/02]	EU3	M1 Visible Emissions	Visible Emissions Evaluation; SW97-4-R1, SWCAA 400 Appendix A
Req-12	Permittee shall not cause or permit any visible emissions from operation of the dry kilns which exceeds five percent (5%) opacity for more than 3 minutes in any one hour period.  SWCAA 02-2414, Section 18.c - [6/17/02]	EU4	M1 Visible Emissions	Visible Emissions Evaluation; SW97-4-R1, SWCAA 400 Appendix A
Req-13	Permittee shall not cause or permit any visible emission from approved operations which exceeds zero percent (0%) opacity for more than three minutes in any one hour.  SWCAA 91-1342, Findings of Fact Section IV - [6/24/91] SWCAA 00-2263, Section 10.c - [4/19/00] SWCAA 01-2399, Section 13.b - [12/17/01] SWCAA 02-2414, Section 18.c - [6/17/02]	EU2, EU5, EU6	M1 Visible Emissions	Visible Emissions Evaluation; SW97-4-R1, SWCAA 400 Appendix A
Req-14	PM emissions from the Seattle Iron Works boiler operation shall not exceed an exhaust concentration of 0.070 gr/dscf (filterable) corrected to 7% O <sub>2</sub> .  SWCAA 02-2414, Section 18.a - [6/17/02]	EU3	M2 Particulate Matter, M14 Boiler Emission Testing	EPA Method 5, 40 CFR 60, SWCAA 400 Appendix A, July, 1996
Req-15	Emissions from lumber drying operations shall not exceed 22.0 tpy VOC, 10.0 tpy PM, 1.80 tpy toluene, and 1.00 tpy 2,2,4 trimethylpentane.  SWCAA 02-2414, Section 18.b - [6/17/02]	EU4	M2 Particulate Matter, M11 Lumber Drying, M13 Lumber Drying Testing	Dry Kiln VOC Testing, SW97-4-R1, Appendix A
Req-16	PM emissions from the baghouses shall not exceed a concentration of 0.005 gr/dscf and a total of 9.0 tpy.  SWCAA 01-2399, Section 13.a - [12/17/01]	EU2	M2 Particulate Matter, M3 Particulate Matter Testing	EPA Method 5, 40 CFR 60, SWCAA 400 Appendix A, July, 1996

Req-17	PM emissions from the green sawdust cyclone shall not exceed a concentration of 0.05 gr/dscf and a total of 2.0 tpy.  SWCAA 01-2399, Section 13.a - [12/17/01]	EU2	M2 Particulate Matter, M3 Particulate Matter Testing	EPA Method 5, 40 CFR 60, SWCAA 400 Appendix A, July, 1996
Req-18	PM emissions from the filing room knock-out boxes shall not exceed a concentration of 0.01 gr/dscf and a combined total of 1.0 tpy.  SWCAA 01-2399, Section 13.a - [12/17/01]	EU5	M2 Particulate Matter, M3 Particulate Matter Testing	EPA Method 5, 40 CFR 60, SWCAA 400 Appendix A, July, 1996
Req-19	Emissions of VOCs from the sap stain spray coating system shall not exceed 2.0 tons per year, and the Kop-Coat NP-1 sap stain usage shall not exceed 2,650 gallons per year. There is no limit to the amount of Diacon Mycostat-P sap stain usage because it contains no VOCs and no TAPs.  SWCAA 00-2263, Section 10.a - [4/19/00]	EU6	M8 Sap Stain System	Mass Balance
Req-20	Ethyl alcohol emissions from the sap stain spray coating system shall not exceed 1.1 tpy.  SWCAA 00-2263, Section 10.b - [4/19/00]	EU6	M8 Sap Stain System	Mass Balance
Req-21	Lumber drying kilns shall not operate at temperatures in excess of 250 °F.  SWCAA 02-2414, Section 18.1 - [6/17/02]	EU4	M11 Lumber Drying	N/A
Req-22	The dry kilns are only approved for drying pine, hemlock, Douglas fir and spruce lumber. Other wood species can be dried after the following information is supplied and written concurrence is provided by SWCAA: wood type, emission factor and basis and amount projected to be dried so as not to exceed established emission limits.  SWCAA 02-2414, Section 18.k - [6/17/02]	EU4	M11 Lumber Drying	N/A
Req-23	The baghouse shall be equipped with a differential pressure gauge which indicates the pressure differential ( $\Delta P$ ) across the filtering media.  SWCAA 01-2399, Section 13.d - [12/17/01]	EU2	M6 Compliance Certification, M12 Material Handling Operations	N/A

Req-24	The Zurn wet venturi scrubber shall operate with a minimum differential pressure of 17" w.c. and a minimum process water circulation rate of 60 gpm, measuring 4" on the flume. The scrubber settling pond shall have a minimum capacity of 3,000 ft <sup>3</sup> and the deep end of the settling pond shall have a water depth of at least 3 feet to assure proper operation of the scrubber system.  SWCAA 02-2414, Sections 18.e & g - [6/17/02]	EU3	M9 Boiler	N/A
Req-25	The scrubber water settling pond shall be monitored and maintained in accordance with the operations and maintenance plan outlined in M10 and as described in Appendix B of this permit.  SWCAA 02-2414, Section 18.j - [6/17/02]	EU3	M10 Settling Pond	N/A
Req-26	Permittee shall install and maintain equipment capable of continuously monitoring the following parameters: dry kiln exhaust temperature, steam flow of Seattle Iron Works boiler, oxygen concentration in the boiler exhaust gases, and pressure drop across the throat of the wet scrubber.  SWCAA 02-2414, Section 18.h - [6/17/02]	EU3, EU4	M6 Compliance Certification, M9 Boiler	N/A
Req-27	Permittee shall install and maintain equipment capable of monitoring the scrubber water circulation rate.  SWCAA 02-2414, Section 18.i - [6/17/02]	EU3	M6 Compliance Certification, M9 Boiler	N/A
Req-28	All containers of materials containing VOCs shall be kept securely closed except when materials are being added, mixed, or removed. All materials containing VOCs which are used to clean and/or flush spray equipment or lines during cleanup shall be collected in a closed container.  SWCAA 00-2263, Section 10.f - [4/19/00]	EU6	N/A	N/A
Req-29	The director or governor may declare and terminate the emergency stage of an episode. This declaration shall constitute an order for action in accordance with applicable SERPs. The plan was prepared by Cowlitz Stud on November 14, 1972 and provisions to limit emissions of particulate matter were established in SERP No. 08-106.  WAC 173-435-050 - [1/3/89] SWCAA 435 - [11/9/98] SERP No. 08-106	Plantwide	M6 Compliance Certification	N/A

**VII. MONITORING REQUIREMENTS**

To assure compliance with all applicable requirements, the permittee shall perform the monitoring program specified below. Each monitoring requirement is indexed according to the underlying requirement(s). Pursuant to WAC 173-401-530(2)(c), the following monitoring requirements do not apply to IEUs.

**M1. Visible Emissions Monitoring** WAC 173-401-615(1) - [10/17/02]

This monitoring requirement applies to Requirements 1, 11, 12, and 13.

The permittee shall perform monthly inspections of affected operations during daylight hours for the purpose of identifying potential visible emission violations. Whenever visible emissions are observed during the monthly inspection, or whenever visible emissions are indicated by a complaint, the permittee shall verify the equipment causing the emissions. The permittee shall within 60 minutes of observing visible emissions confirm whether the equipment involved is experiencing a malfunction and determine if all pollution control equipment is operating properly. The permittee shall either eliminate visible emissions within 24 hours of initial discovery or demonstrate compliance by recording opacity within three working days using the visual emission evaluation method in SWCAA 400 Appendix A. Implementation of corrective action does not relieve the permittee from the obligation of reporting permit deviations as specified in WAC 173-401-615(3). Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

**M2. Particulate Matter Emissions Monitoring** WAC 173-401-615(1) - [10/17/02]

This monitoring requirement applies to Requirements 9, 10, 14, 15, 16, 17, and 18.

The permittee shall perform monthly inspections of affected operations during daylight hours for the purpose of identifying potential particulate matter emissions violations. Whenever particulate matter fallout or visible emissions are observed during the monthly inspection, the permittee shall verify the equipment causing the emissions. The permittee shall within 60 minutes of observing the emissions confirm whether the equipment involved is experiencing a malfunction and whether all air pollution control equipment is operating properly. The permittee shall resolve identified problems within 24 hours of initial discovery, or notify SWCAA by the next working day of the progress made in resolving the problem. Records of test results shall be maintained in accordance with Section VIII of this permit.

**M3. Particulate Matter Emission Testing** SWCAA 01-2399 Section 13.e - [12/17/01]

This monitoring requirement applies to Requirements 10, 16, 17, and 18.

The permittee shall emission test particulate matter control equipment in accordance with the following schedule:

<u>Control Equipment</u>	<u>Test Date</u>
Filing room knock-out boxes, Baghouse #1	Tested prior to June 1, 1997, and every eight years thereafter
Sawdust cyclone	Tested prior to June 1, 2003, and every eight years thereafter

Emission testing shall be conducted as specified in SWCAA 01-2399, Appendix A. Specific emission testing may be waived by SWCAA upon written request from the permittee. Such a request must be justified based on the grounds that prior tests have shown compliance by a wide margin, and that adequate alternative evidence exists to show continuing compliance. Records of test results shall be maintained in accordance with Section VIII of this permit.

**M4. Fugitive Emissions Monitoring** WAC 173-401-615(1) - [10/17/02]  
SWCAA 02-2414 Section 19 and 20.m - [6/17/02]

This monitoring requirement applies to Requirements 3 and 8.

The permittee shall perform monthly inspections of affected operations during daylight hours for the purpose of identifying excess fugitive emissions. Whenever fugitive emissions are observed during the monthly inspection, the permittee shall determine the source of the emissions. The permittee shall within 60 minutes of discovery confirm whether the equipment involved is experiencing a malfunction, and whether reasonable precautions and good work practices are being employed to minimize emissions. For purposes of this condition reasonable precautions shall include, but not be limited to, the following:

- a. Vent dry kiln emissions through an elevated stack when actively drying wood;
- b. Use a street sweeper, or similar type equipment, on a weekly basis during periods when significant rainfall has not occurred for 15 days or more, or more frequently as necessary to minimize dust accumulation on paved areas throughout the mill. The dates the street sweeper is used to reduce fugitive emissions shall be recorded for each use; and
- c. Use a water truck to apply water to unpaved traffic areas on a daily basis during periods when significant rainfall has not occurred for 15 days or more, or more frequently as necessary, to minimize fugitive road dust. The dates the water truck is used to reduce fugitive emissions shall be recorded for each use.

Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

**M5. Complaint Monitoring** WAC 173-401-615(1) - [10/17/02]

This monitoring requirement applies to Requirements 2, 3, 4, 5, and 8.

The permittee shall record, and maintain record of, any complaints received by the permittee or received by SWCAA and provided to the permittee. All complaints shall be investigated no later than one work day after the permittee has been notified. Investigation shall determine the validity of each complaint, the cause of emissions which prompted the complaint, and what, if any, corrective action was taken in response to the complaint. Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

**M6. Compliance Certification** WAC 173-401-615(1) - [10/17/02]  
SWCAA 01-2399 Section 13.d - [12/17/01]  
SWCAA 02-2414 Section 18 h. & i - [6/17/02]

This monitoring requirement applies to Requirements 7, 23, 26, 27 and 29.

The permittee shall certify the following in each semi-annual report:

- (a) Installed equipment does not conceal or mask any emissions which are otherwise in violation of general standards;
- (b) Equipment capable of monitoring the following parameters on a continuous basis is installed and maintained:
  - (i) Dry kiln exhaust temperature;
  - (ii) Steam flow of Seattle Iron Works boiler;
  - (iii) Oxygen concentration in the boiler exhaust gases; and
  - (iv) Pressure drop across the throat of the wet scrubber.
- (c) Equipment capable of monitoring the scrubber water circulation rate is installed and maintained;
- (d) A differential pressure gauge which indicates the pressure differential across the filtering media of the baghouse is installed and maintained; and
- (e) The Source Emission Reduction Plan (SERP) as outlined in SERP No. 08-106 was followed during all periods of air pollution alert, warning and emergency for the purposes of RCW 70.94.715, WAC 173-435, and SWCAA 435.

**M7. SO<sub>2</sub> Emission Standard** WAC 173-401-615(1) - [10/17/02]

This monitoring requirement applies to Requirement 6.

The permittee shall certify in each semi-annual report that only hogged fuel is used to fire the process boiler at the facility.

**M8. Sap Stain System** SWCAA 00-2263 Section 10.h - [4/19/00]

This monitoring requirement applies to Requirements 19 and 20.

The permittee shall record, and maintain record of, the amount of and type of coatings used in the sap stain system on a monthly basis. Records shall be available for inspection no later than 30 days from the last day of the month. Compliance with specified emission limits is to be calculated based on sap stain throughput. Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

**M9. Maintenance and Monitoring of Boiler Operations** SWCAA 02-2414 Sections 20.b - d and f - h - [6/17/02]

This monitoring requirement applies to Requirement 24, 26 and 27.

The permittee shall maintain and monitor boiler operations as follows:

- (a) Hours of operation recorded monthly for the Seattle Iron Works boiler;
- (b) Steam production of Seattle Iron Works boiler recorded daily;
- (c) Oxygen level of Seattle Iron Works boiler exhaust gas recorded daily;
- (d) Pressure drop across the throat of the wet scrubber recorded daily;
- (e) Wet scrubber process water circulation rate recorded daily; and
- (f) Wet scrubber settling pond water depth at the deep side of the pond recorded daily.

The permittee shall perform daily inspections of affected operations during daylight hours to confirm that equipment operating parameters are in compliance with applicable requirements. Whenever noncompliant conditions are observed during the daily inspection or at any other time, the permittee shall within 60 minutes of discovery confirm whether the equipment involved is experiencing a malfunction, and if all air pollution control equipment is operating properly. Within 24 hours of initial discovery, permittee shall resolve the operational deficiency, or notify SWCAA by the next working day of progress made in resolving the operating problem. Implementation of corrective action does not relieve the permittee from the obligation of reporting permit deviations as specified in WAC 173-401-615(3). Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

**M10. Maintenance and Monitoring of Settling Pond Water Quality** SWCAA 02-2414 Sections 18.j and 20.e- [6/17/02]

This monitoring requirement applies to Requirement 25.

The permittee shall maintain and monitor settling pond water quality as follows:

- (a) Polymer flocculent shall be added to scrubber water on a daily basis as needed. The quantity of flocculent added shall be predetermined by the Respondent. The flocculent delivery system shall be monitored on a daily basis for proper function and to assure flocculent is added to the scrubber pond. Facility personnel shall correct delivery system malfunctions as soon as possible. Flocculent shall be manually delivered as necessary to the scrubber pond if the delivery system can not be fixed within 8 hours;
- (b) Scrubber water quality shall be visually evaluated on a daily basis using the standard procedure as described in Appendix B of this permit. Results of the visual evaluation shall be graded as excellent, normal, or poor. The permittee shall take immediate corrective action whenever a poor result is encountered; and
- (c) Samples of the scrubber water shall be tested for total suspended solids on a quarterly basis.

Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

**M11. Monitoring and Emissions from Lumber Drying** SWCAA 02-2414 Sections 20.k & l - [6/17/02]

This monitoring requirement applies to Requirement 15, 21 and 22.

The permittee shall record, and maintain record of, the species, quantity, and final moisture content of lumber dried in the facility's dry kilns on a monthly basis. The temperature of the dry kiln exhaust air shall be recorded on a daily basis. Periods of non-operation should be recorded as such. Records shall be available for inspection no later than 30 days from the last day of the month. Compliance with specified emission limits is to be calculated based on lumber throughput and emission factors provided by M13. Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

**M12. Material Handling Operations Monitoring** WAC 173-401-615(1) - [10/17/02]  
SWCAA 01-2399 Section 13.f & Appendix A 3.e - [12/17/01]  
SWCAA 02-2414 Section 20.j - [6/17/02]

This monitoring requirement applies to Requirement 23.

The permittee shall record monthly tons of chips/shavings/sawdust unloaded from load-out bunkers.

The permittee shall record weekly the differential pressure across the baghouse filter media.

The permittee shall record monthly the hours of operation for the baghouse, cyclone and knock-out boxes.

The permittee shall perform monthly inspections of affected operations during daylight hours for the purpose of identifying potential particulate matter emission violations. Whenever visible emissions are observed during the monthly inspection, or whenever visible emissions are indicated by a complaint, the permittee shall verify the equipment causing the emissions. The permittee shall within 60 minutes of observing visible emissions confirm whether the equipment involved is experiencing a malfunction and whether air pollution control equipment is operating properly. Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

**M13. Lumber Drying Emission Testing** SWCAA 02-2414, Section 25.b - [6/17/02]

This monitoring requirement applies to Requirement 15.

The permittee shall emission test lumber drying operations prior to March 1997, and every five years thereafter. Emission testing shall be conducted as specified in "Dry Kiln VOC Testing" in Appendix A of this permit. Specific emission testing may be waived by SWCAA upon written request from the permittee. Such a request must be justified based on the grounds that prior tests have shown compliance by a wide margin, and that adequate alternative evidence exists to show continuing compliance. Records of test results shall be maintained in accordance with Section VIII of this permit.

**M14. Boiler Emission Testing** SWCAA 02-2414, Section 25.a - [6/17/02]

This monitoring requirement applies to Requirements 9 and 14.

The permittee shall emission test the wood fired boiler prior to February 2004, and every two years thereafter. Emission testing shall be conducted as specified in SWCAA 02-2414, Appendix A. Specific emission testing may be waived by SWCAA upon written request from the permittee. Such a request must be justified based on the grounds that prior tests have shown compliance by a wide margin, and that adequate alternative evidence exists to show continuing compliance. Records of test results shall be maintained in accordance with Section VIII of this permit.

## VIII. RECORDKEEPING REQUIREMENTS

All monitoring records shall be maintained in a readily accessible form for a minimum period of five years. Pursuant to WAC 173-401-530(2)(c), none of the recordkeeping requirements apply to IEUs. The permittee shall maintain records of required monitoring per M1 through M14 as follows if applicable:

- K1. General Recordkeeping** WAC 173-401-615(2) - [10/17/02]  
SWCAA 00-2263 Section 10.g & h – [4/19/00]

SWCAA 01-2399 Sections 13.f, Appendix A - [12/17/01]  
SWCAA 02-2414 Sections 20, 25, Appendices B & C -  
[6/17/02]

Permittee is required to keep the following records:

(a) Inspections and Certifications

- (i) The date, place, and time of activity;
- (ii) Who conducted the inspection or certification;
- (iii) The operating conditions existing at the time of the activity;
- (iv) Compliance status of each monitored requirement as described in Section V and VII of this permit; and
- (v) Corrective action taken in response to permit deviations and when action was initiated.

(b) Complaints

- (i) The date and time of complaint;
- (ii) Name of the complainant;
- (iii) The nature of the complaint;
- (iv) Date and time of follow-up inspection; and
- (v) Corrective action taken in response to complaints and when action initiated.

(c) Upset Conditions/Excess Emissions

- (i) The date and time of upset or excess emission;
- (ii) Identification of the emissions unit involved;
- (iii) A brief description of the event;
- (iv) Duration of the event; and
- (v) Anticipated corrective action to prevent or minimize excess emissions.

(d) Sampling and Emissions Testing

- (i) The date sampling was performed;
- (ii) The entity that performed the sampling;
- (iii) The analytical techniques used to take the sample or perform the observation;
- (iv) The operating conditions existing at the time of sampling or measurement;
- (v) The date analyses were performed;
- (vi) The entity that performed the analyses;
- (vii) The analytical techniques or methods used to perform the analyses;
- (viii) The results of such analyses;
- (ix) Compliance status of each monitored requirement; and
- (x) Corrective action taken in response to permit deviations and when such action was initiated.

**IX. REPORTING REQUIREMENTS**

All required reports must be certified by a responsible official consistent with WAC 173-401-520. Where an applicable requirement requires reporting 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.

Addresses of regulatory agencies are the following, unless otherwise instructed:

Southwest Clean Air Agency  
11815 NE 99 St., Ste 1294  
Vancouver, WA 98682

U.S. EPA Region X  
Air Operating Permits  
1200 Sixth Avenue, OAQ-107  
Seattle, WA 98101

**R1. Deviations from Permit Conditions**

WAC 173-400-107 - [9/20/93]

WAC 173-401-615(3)(b) - [10/17/02]

Deviations from permit requirements shall be reported no later than thirty days after the end of the month during which the deviation is discovered. Deviations that represent a potential threat to human health or safety shall be reported as soon as possible but no later than twelve hours after the deviation is discovered. Reports of deviations shall include:

- (a) Identification of the emission unit(s) involved;
- (b) The duration of the event including the beginning and end times; and
- (c) A brief description of the event, including:
  - (i) Whether or not the deviation was due to an upset condition;
  - (ii) The probable cause of the deviations; and
  - (iii) The corrective action taken and when the corrective action was initiated.

**R2. Complaint Reports** WAC 173-401-615(3) - [10/17/02]

The permittee shall report all complaints to SWCAA within three days of receipt. Complaint reports shall include the date and time of the complaint, the name of the complainant, and the nature of the complaint.

**R3. Semi-annual Reports** WAC 173-401-615(3) - [10/17/02]  
SWCAA 02-2414 Section 22 - [6/17/02]

The permittee shall submit to SWCAA by September 15th and March 15th for the six month periods January through June and July through December, respectively, the following information:

- (a) Records of all required monitoring, and any deviation from permit requirements shall be clearly identified;

- (b) For all EPA Method 9 or SWCAA Method 9 monitoring conducted during the semi-annual period, a copy of the relevant opacity certification(s) shall be submitted with the semi-annual report;
- (c) Malfunctions in flocculent delivery system, results of scrubber water quality evaluations, corrective action taken to improve scrubber water quality, pressure drop across the throat of the wet scrubber, and results of total suspended solids testing;
- (d) Hours of operation and steam output of the Seattle Iron Works boiler;
- (e) Board feet of lumber dried, moisture content of wood dried, and type of wood dried in the dry kilns;
- (f) Tons of wood waste loaded out from bunkers;
- (g) Summary of emissions to the atmosphere;
- (h) Upset conditions; and
- (i) All required reports must be certified by a responsible official consistent with WAC 173-401-520. The reports shall be either certified at initial submittal or each shall be delineated and certified in the subsequent semi-annual report.

**R4. Annual Reports** WAC 173-401-630(5) - [11/4/93]  
 SWCAA 00-2263 Section 10.i - [4/19/00]  
 SWCAA 01-2399 Section 13.g - [12/17/01]  
 SWCAA 02-2414 Section 23 - [6/17/02]

- (a) Annual Compliance Certification:  
 The permittee shall submit to SWCAA and EPA a certification of compliance with all terms and conditions of this permit in accordance with WAC 173-401-630(5)(d). The permittee shall submit by March 15<sup>th</sup> of the following year the following information for the period of January through December:
  - (i) Identification of each term or condition of the permit that is the basis of the certification;
  - (ii) Statement of compliance status;
  - (iii) Whether compliance was continuous or intermittent;
  - (iv) Method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with WAC 173-401-615;
  - (v) Such other facts as SWCAA may require to determine the compliance status of the source; and
  - (vi) Such additional requirements as may be specified pursuant to Sections 114(a)(3) and 504(b) of the FCAA.
- (b) Annual Reports:  
 The permittee shall report the following to SWCAA annually by March 15<sup>th</sup> for the previous calendar year:
  - (i) The annual grate cleaning schedule (EU-3 only);
  - (ii) Annual hours of operation for the baghouse, cyclone and knock-out boxes; and
  - (iii) Coating consumption and amount of hazardous waste disposed.

- R5. Emission Inventory Reports** WAC 173-400-105 - [9/20/93 SIP, 9/15/01 State Only],  
SWCAA 400-105 - [9/21/95 SIP, 11/9/03 Local Only]  
SWCAA 02-2414 Section 24 - [6/17/02]

The permittee shall submit an inventory of annual emissions from the source each calendar year to SWCAA by March 15<sup>th</sup> of the following year in accordance with SWCAA 400-105. The inventory shall include stack and fugitive emissions of NO<sub>x</sub>, SO<sub>2</sub>, CO, VOC, PM, and toxic air pollutants identified in WAC 173-460.

- R6. Source Test Reports** WAC 173-401-615(3) - [10/17/02]  
SWCAA 400-106 – [11/9/03 Local Only]  
SWCAA 01-2399 Appendix A - [12/17/01]  
SWCAA 02-2414 Appendices B & C - [6/17/02]

Reports of all required source or emissions testing shall be submitted to the Agency within 45 days of test completion. Each report shall include:

- (a) A description of the source including manufacturer, model number and design capacity of the equipment, and the location of the sample ports or test locations.
- (b) Time and date of the test and identification and qualifications of the personnel involved.
- (c) A summary of results, reported in units and averaging periods consistent with the applicable emission standard or limit.
- (d) A summary of control system or equipment operating conditions.
- (e) A summary of production related parameters.
- (f) A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation.
- (g) A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation.
- (h) Copies of field data and example calculations.
- (i) Chain of custody information.
- (j) Calibration documentation.
- (k) Discussion of any abnormalities associated with the results.
- (l) A statement signed by the senior management official of the testing firm certifying the validity of the source test report.

**X. NON-APPLICABLE REQUIREMENTS** WAC 173-401-640(2) - [11/4/93]

The following table lists all federal, state, and/or local requirements which might reasonably apply to the permittee, but are deemed nonapplicable after review by SWCAA.

**1. Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (Subpart Dc)** 40 CFR 60.40c et seq. - [7/1/03]

Subpart Dc applies to all steam generation units for which construction, modification, or reconstruction is commenced after June 9, 1989, and that have a maximum design heat

input between 10 million and 100 million Btu per hour. The hogged fuel boiler at this source has a design heat input between 10 million and 100 million Btu per hour, but was last modified prior to June 9, 1989. Therefore, this requirement is not applicable.

**2. Standards of Performance for Incinerators (Subpart E) 40 CFR 60.50 et seq. - [7/1/03]**

Subpart E applies to all incinerators with charging rates greater than 50 tons per day which commenced construction or modification after August 17, 1971. Pursuant to 40CFR60.51(a), an incinerator is defined as any "...furnace used in the process of burning solid waste for the purpose of reducing the volume of the waste by removing combustible matter." The hogged fuel boiler at this source has a charging rate greater than 50 tons per day, but its primary purpose is the production of process steam not the reduction of waste volume. Therefore, this requirement is not applicable.

**3. Emission Standards for Combustion and Incineration Units WAC 173-400-050(2) - [9/15/01], SWCAA 400-050(2) - [9/21/95 SIP, 11/9/03 Local Only]**

WAC 173-400-050(2) prohibits emissions of carbonyls from any incinerator in excess of 100 ppm total carbonyls as measured by applicable sampling methods. Pursuant to WAC 173-400-030(34), an incinerator is defined as "...a furnace used primarily for the thermal destruction of waste." The primary purpose of the hogged fuel boiler at this source is the production of process steam not the destruction of waste so this requirement is not applicable.

**4. Registration Program WAC 173-400-099 - [4/22/95 State Only], SWCAA 400-100(2) - [9/21/95 SIP, 11/9/03 Local Only]**

The permittee is an air operating permit source. Pursuant to WAC 173-400-101(7), air operating permit sources are exempt from the registration program established under WAC 173-400-099, and implemented in accordance with WAC 173-400-100 through WAC 173-400-104. Pursuant to SWCAA 400-100(3)(a)(iv) air operating permit sources are exempt from the registration requirements of SWCAA 400-100(2).

**5. Solid Waste Incinerator Facilities WAC 173-434 [1/22/04]**

WAC 174-434 applies to all solid waste or solid waste derived fuel incinerator facilities constructed after January 1, 1985 with a design capacity greater than twelve tons per day or constructed prior to January 1, 1985, which begin to burn twelve tons or more per day after January 1, 1985. Pursuant to WAC 173-434-030(3), the fuel used in the hogged fuel boiler is not included in the definition of solid waste. Therefore, this requirement is not applicable.

**6. Boiler and Process Heater MACT (Subpart DDDDD) 40 CFR 63 - [2/26/04]**

Subpart DDDDD applies to all industrial, commercial, and institutional boilers and process heaters located at facilities that emit more than 10 tons per year of a single HAP or 25 tons per year combined HAPs. The permittee is not major for HAPs. Therefore, this requirement is not applicable.

**7. Plywood and Composite Wood Products MACT (Subpart DDDD) 40 CFR 63 - [2/26/04]**

Subpart DDDD applies to various wood products facility processes, including dry kilns, located at facilities that emit more than 10 tons per year of a single HAP or 25 tons per year combined HAPs. The permittee is not major for HAPs. Therefore, this requirement is not applicable.

**APPENDIX A**  
**DRY KILN VOC TESTING**

(Attached)

**APPENDIX B**

**SCRUBBER WATER VISUAL EVALUATION METHOD**

(Attached)

**APPENDIX C**

**SOURCE EMISSION REDUCTION PLAN (SERP)**

(Attached)