

TransAlta Centralia Mining, LLC

Centralia Mine

Air Operating Permit

SW01-12-R1-A

Issued: June 4, 2008

Southwest Clean Air Agency
11815 NE 99th Street, Suite 1294
Vancouver, WA 98682-2454
Telephone: (360) 574-3058

AIR OPERATING PERMIT #: SW01-12-R1-A

ISSUED TO: TransAlta Centralia Mining, LLC
913 Big Hanaford Road
Centralia, WA 98531-9100

PLANT SITE: TransAlta
Centralia Mine
1015 Big Hanaford Road
Centralia, WA 98531-9100

NATURE OF BUSINESS: Coal Mining Operations

SIC / NAICS: 1221 / 212111

AIRS NUMBER: 53-041-00046

EFFECTIVE DATE: June 4, 2008

EXPIRATION DATE: January 10, 2012

RENEWAL APPLICATION DUE: July 10, 2011

PERMIT ENGINEER:

Clint H. Lamoreaux, Air Quality Engineer

Date

REVIEWED BY:

Paul T. Mairose, Chief Engineer

Date

APPROVED BY:

Robert D. Elliott, Executive Director

Date

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Appendix A SWCAA Method 9 - Visual Opacity Determination MethodA-1

I. ABBREVIATIONSList of Common Abbreviations

Administrator	EPA Region X Administrator
AOP	Air Operating Permit
BACT	Best Available Control Technology
CO	Carbon monoxide
CFR	Code of Federal Regulations
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 "#"
K#	Refers to a specific recordkeeping requirement numbered "#"
lb/hp-hr	Pounds per horsepower per hour
M#	Refers to a specific monitoring requirement numbered "#"
MSDS	Material safety data sheet
NO _x	Oxides of nitrogen
NR#	Nonapplicable requirement numbered "#"
NSPS	New Source Performance Standards (40 CFR 60)
NSR	New source review
O ₂	Oxygen
P#	Permit provision numbered "#"
PM	Particulate matter
ppmvd	Parts per million by volume, dry
PTE	Potential to emit
R#	Refers to a specific reporting requirement numbered "#"
RCW	Revised Code of Washington
Region 10	Region 10 of the U.S. Environmental Protection Agency
Req-#	Applicable requirement numbered "#"
ROM coal	Run of Mine coal – raw, unprocessed coal
SIP	State implementation plan
SO ₂	Sulfur dioxide
SQER	Small Quantity Emission Rate identified in WAC 173-460
SWCAA	Southwest Clean Air Agency – Formerly Southwest Air Pollution Control Authority
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 emissions limitations, operating requirements, monitoring requirements, 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 Terms and Conditions, Recordkeeping Terms and Conditions, and Reporting Terms and Conditions. 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 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 VI, "Operating 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 Title V Basis Statement for this permit.

III. EMISSION UNIT IDENTIFICATION

The following table contains emission unit identifications. Descriptions of each emission unit are contained in the Basis Statement for this Air Operating Permit.

EU #	Generating Equipment/Activity	Emission Control
EU-1	Sandblast Booth	Particulate matter filtration system
EU-2	Coal Processing	Wet suppression, enclosure to minimize fugitive dust generation
EU-3	Coal Laboratory	None
EU-4	Parts Cleaning	Proper operation of cleaning tanks
EU-5	Smudge Pots	None
EU-6	Spray Booth	Particulate matter filtration system
EU-7	Diesel Engines	Operating hours limits, low sulfur fuel

IV. PERMIT PROVISIONS

P1. Credible Evidence

40 CFR 51.212 – [7/1/06]
 40 CFR 52.12 - [7/1/06]
 40 CFR 52.33 – [7/1/06]
 40 CFR 60.11 – [7/1/06]
 40 CFR 61.12 – [7/1/06]

For the purposes of submitting compliance certifications or establishing whether a violation of any term or condition of this permit has occurred or is occurring, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether the Permittee would have been in compliance with a specific term or condition if the appropriate performance or compliance test or procedure would have been performed.

P2. Confidentiality of Records and Information

WAC 173-401-500(5) – [10/17/02]
WAC 173-401-620(2)(e) – [11/4/93]

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. [SWCAA 400-270]

In the case where the permittee has submitted information to SWCAA under a claim of confidentiality, SWCAA may also require the source to submit a copy of such information directly to the Administrator. [WAC 173-401-500(5)]

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. [WAC 173-620(2)(e)]

P3. Permit Duration

WAC 173-401-610 - [10/17/02]

This permit shall be valid for a fixed term of 5 years.

P4. 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 in accordance with RCW 70.94.162 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 herein 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.

P5. Insignificant Emission Unit - Permit Revision

WAC 173-401-530(6) - [10/17/02]

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.

P6. Federally Enforceable Requirements

WAC 173-401-625 - [11/4/93]

- (a) All terms and conditions in an air operating permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the FCAA, except as indicated in paragraph (b) below.

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

P7. Permit Shield

WAC 173-401-640 - [11/4/93]

Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements that are specifically identified in this permit as of the date of permit issuance. Nothing in this permit shall alter or affect the following:

- (a) The provisions of section 303 of the FCAA (emergency orders), including the authority of the Administrator under that section;
- (b) The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- (c) The applicable requirements of the acid rain program, consistent with section 408(a) of the FCAA;
- (d) The ability of EPA to obtain information from a source pursuant to section 114 of the FCAA; and
- (e) The ability of the permitting authority to establish or revise requirements for the use of reasonably available control technology (RACT) as defined in RCW 70.94.

P8. 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. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

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

Burden of proof lies with the permittee.

P9. 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.

P10. Excess Emissions

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

SWCAA 400-107 - [9/21/95 SIP, 12/16/05 Local Only]

The permittee shall report excess emissions to SWCAA as soon as possible. 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.

Excess emissions due to upsets shall be considered unavoidable provided that the permittee reports as soon as possible but no later than 48 hours after discovery, and adequately demonstrates that:

- (a) The event was not caused by poor or inadequate design, operation, or maintenance, or any other reasonably preventable conditions;

- (b) The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance;
- (c) The operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded; and
- (d) The owner or operator(s) actions in response to the excess emissions were documented by properly signed, contemporaneous operating logs, or other relevant evidence.

V. GENERAL TERMS AND CONDITIONS

G1. Asbestos

40 CFR 61 Subpart M - [7/1/06]
WAC 173-400-075 - [6/8/07 State Only]
SWCAA 400-075 - [12/14/06 Local Only]
SWCAA 476 - [3/18/01 Local Only]

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

G2. Chemical Accident Prevention

40 CFR 68 - [7/1/06]

The permittee shall comply with the requirements of the Chemical Accident Prevention Provisions of 40 CFR 68 no later than the following dates:

- (a) Three years after the date on which a regulated substance, present above the threshold quantity, is first listed under 40 CFR 68.130; or
- (b) The date on which a regulated substance is first present above a threshold quantity in a process. [40 CFR 68.10]

G3. Protection of Stratospheric Ozone

40 CFR 82, Subparts B and F - [7/1/06]

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

G4. 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.

G5. 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.

G6. Inspection and Entry

WAC 173-401-630(2) - [11/4/93]
WAC 173-400-105(3) & (4) – [6/8/07]
SWCAA 400-105(3) – [12/14/06]
SWCAA 400-106(1)(a) – [12/14/06]

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.

G7. Schedule of Compliance

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.

G8. Permit Renewal, Expiration and Revocation

WAC 173-401-710 - [10/17/02]

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) and WAC 173-401-500. 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.

This permit expires on January 10, 2012. A renewal application is due no later than January 10, 2011 and a complete renewal application is due no later than July 10, 2011.

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

G9. Transfer of Ownership or Operational Control

WAC 173-401-720(1)(d) - [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.

G10. Portable Sources

WAC 173-400-035 - [10/7/07 State Only]

WAC 173-400-110(5) – [9/20/93 SIP Only]

SWCAA 400-110(5) - [11/21/96 SIP Only]

SWCAA 400-110(6) – [12/14/06 Local Only]

Portable sources which locate temporarily at the site of an air operating permit source shall be allowed to operate at the temporary location without filing an Air Discharge Permit application provided that:

- (a) The source/emissions units are registered with SWCAA;
- (b) The source/emissions units have an Air Discharge Permit 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.

G11. Misrepresentation and Tampering

WAC 173-400-105(7 & 8) – [9/20/93 SIP, 6/8/07 State Only]
SWCAA 400-105(6 & 7) - [9/21/95 SIP, 12/14/06 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 70.94 RCW, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto.

G12. New Source Review

WAC 173-400-110 - [9/20/93 SIP only, 6/8/07 State Only]
WAC 173-400-700 [2/10/05]
WAC 173-460 - [8/21/98 State Only]
SWCAA 400-109 – [12/14/06 Local Only]
SWCAA 400-110 - [11/21/96 SIP, 12/14/06 Local Only]
SWCAA 400-141 - [12/14/06 Local Only]

The permittee shall not construct or modify a source which is required to be reviewed under SWCAA 400, WAC 173-400 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 **G9 - Portable Sources**.

G13. 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, 12/14/06 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.

G14. 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.

VI. OPERATING TERMS AND CONDITIONS

The following table lists all federal, state, and/or locally enforceable operating terms and conditions 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.

Req. #	Requirement	Emission Point	Monitoring
Req-1	<p>Permittee shall not cause or permit any emission which exceeds 20% opacity for more than three minutes, in any one hour.</p> <p>Reference Method: SWCAA Method 9</p> <p>[WAC 173-400-040(1)(a)&(b) - 9/20/93 SIP, 2/10/05 State Only SWCAA 400-040(1)(a)&(b) - 9/21/95 SIP, 12/14/06 Local Only]</p>	Plantwide	M1 Visible Emissions
Req-2	<p>Permittee shall not cause or permit fallout of particulate matter beyond the source's property boundary in sufficient quantity to interfere unreasonably with use and enjoyment of the property on which the fallout occurs.</p> <p>[WAC 173-400-040(2) – 2/10/05 State Only SWCAA 400-040(2) - 12/14/06 Local Only]</p>	Plantwide	M1 Visible Emissions, M2 Fugitive Emissions, M3 Complaints
Req-3	<p>Permittee shall take reasonable precautions to prevent the release of fugitive emissions from any emission unit which is a source of fugitive emissions.</p> <p>[WAC 173-400-040(3)(a) - 9/20/93 SIP, 2/10/05 State Only SWCAA 400-040(3)(a) - 9/15/95 SIP, 12/14/06 Local Only]</p>	Plantwide	M2 Fugitive Emissions, M4 Operations
Req-4	<p>Permittee shall use recognized good practice and procedures to reduce odors to a reasonable minimum.</p> <p>[WAC 173-400-040(4) – 2/10/05 State Only SWCAA 400-040(4) - 12/14/06 Local Only]</p>	Plantwide	M3 Complaints
Req-5	<p>Permittee shall not cause or permit emissions detrimental to persons or property.</p> <p>[WAC 173-400-040(5) - 9/20/93 SIP, 2/10/05 State Only SWCAA 400-040(5) - 9/21/95 SIP, 12/14/06 Local Only]</p>	Plantwide	M3 Complaints

Req. #	Requirement	Emission Point	Monitoring
Req-6	<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>[WAC 173-400-040(7) - 9/20/93 SIP, 2/10/05 State Only SWCAA 400-040(7) - 9/21/95 SIP, 12/14/06 Local Only]</p>	Plantwide	N/A
Req-7	<p>Permittee shall take reasonable precautions to prevent emissions of fugitive dust and operate the source to minimize emissions.</p> <p>Reference Method: SWCAA Method 9</p> <p>[WAC 173-400-040(8)(a) - 9/20/93 SIP, 2/10/05 State Only SWCAA 400-040(8)(a) - 9/21/95 SIP, 12/14/06 Local Only]</p>	Plantwide	M2 Fugitive Emissions, M3 Complaints
Req-8	<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>Reference Method: EPA Method 5</p> <p>[WAC 173-400-060 - 3/22/91 SIP, 2/10/05 State Only SWCAA 400-060 - 9/21/95 SIP, 12/14/06 Local Only]</p>	Plantwide	M1 Visible Emissions, M4 Operations
Req-9	<p>Permittee shall conduct all abrasive blasting inside a booth or structure designed to capture the blast grit, overspray, and removed material except that outdoor blasting of structures or items too large to be reasonably handled indoors or in an enclosure shall employ control measures such as curtailment during windy periods, wet blasting, and/or enclosure with tarps of the area being blasted.</p> <p>[SWCAA 400-070(8) - 9/21/95 SIP, 12/14/06 Local Only]</p>	Plantwide	N/A
Req-10	<p>Permittee shall maintain and operate equipment in a manner consistent with good air pollution control practices for minimizing emissions.</p> <p>[40 CFR 60.11(d) - 7/1/06 WAC 173-400-115 - 6/8/07 State Only SWCAA 400-115 - 12/14/06 Local Only]</p>	EU-2	N/A
Req-11	<p>Permittee shall not cause or permit opacity from any potential points of emission to exceed 20 percent.</p> <p>Reference Method: EPA Method 9</p> <p>[40 CFR 60.250 <u>et seq.</u> (Subpart Y) - 7/1/06 WAC 173-400-115 - 6/8/07 State Only SWCAA 400-115 - 12/14/06 Local Only]</p>	EU-2	M1 Visible Emissions, M5 Performance Testing

Req. #	Requirement	Emission Point	Monitoring
Req-12	<p>Permittee shall not cause or permit emissions of PM from coal processing to exceed 10.0 tons per year and 4.0 pounds per hour based on an emission factor of 0.02 pounds per ton raw coal and 90% wet suppression control efficiency. (This requirement applies only to the jig processing equipment and shall be superseded by Req-17 when the jig processing equipment is retired.)</p> <p>[SWCAA 94-1641R1 Section 10(a) - 6/28/96]</p>	EU-2	M2 Fugitive Emissions, M6 Coal Processing
Req-13	<p>Permittee shall not cause or permit opacity from any potential emission point to exceed zero percent for greater than 3 minutes in any one hour. (This requirement applies only to the jig processing equipment and shall be superseded by Req-18 when the jig processing equipment is retired.)</p> <p>Reference Method: SWCAA Method 9</p> <p>[SWCAA 94-1641R1 Section 10(b) – 6/28/96]</p>	EU-2	M1 Visible Emissions, M2 Fugitive Emissions
Req-14	<p>Permittee shall not cause or permit odors that cause nuisance conditions. (This requirement applies only to the jig processing equipment and shall be superseded by Req-19 when the jig processing equipment is retired.)</p> <p>[SWCAA 94-1641R1 Section 10(c) - 6/28/96]</p>	EU-2	M3 Complaints
Req-15	<p>Permittee shall add water to the coal prior to crushing as necessary to prevent the release of fugitive dust. (This requirement applies only to the jig processing equipment and shall be superseded by Req-22 when the jig processing equipment is retired.)</p> <p>Reference Method: SWCAA Method 9</p> <p>[SWCAA 94-1641R1 Section 10(d) - 6/28/96]</p>	EU-2	M2 Fugitive Emissions, M6 Coal Processing
Req-16	<p>Additional dust suppression water spray nozzles and equipment shall be added, as necessary, to control fugitive dust from the processing equipment in the event that processes or weather patterns change resulting in insufficient water spray application to control fugitive dust from crushing operations. (This requirement applies only to the jig processing equipment and shall be superseded by Req-22 when the jig processing equipment is retired.)</p> <p>Reference Method: SWCAA Method 9</p> <p>[SWCAA 94-1641R1 Section 10(f) - 6/28/96]</p>	EU-2	M2 Fugitive Emissions, M6 Coal Processing
Req-17	<p>Permittee shall not cause or permit emissions of PM from coal processing to exceed 2.0 tons per year. Emissions shall be estimated using equation 1 from AP-42 Section 13.2.4 (1/95) for uncontrolled emissions from transfer points. (This requirement only applies to the heavy media equipment permitted in SWCAA 01-2332R1.)</p> <p>[SWCAA 01-2332R1 Section 15(a) – 4/23/02]</p>	EU-2	M2 Fugitive Emissions, M6 Coal Processing

Req. #	Requirement	Emission Point	Monitoring
Req-18	<p>Permittee shall not cause or permit opacity from any potential emission point to exceed zero percent for greater than 3 minutes in any one hour. (This requirement only applies to the heavy media equipment permitted in SWCAA 01-2332R1.)</p> <p>Reference Method: SWCAA Method 9</p> <p>[SWCAA 01-2332R1 Section 15(b) - 4/23/02]</p>	EU-2	M1 Visible Emissions, M2 Fugitive Emissions, M5 Performance Testing
Req-19	<p>Operations which cause or contribute to odors which unreasonably interfere with any other property owner's use and enjoyment of their property shall use recognized good practice and procedures to reduce these odors to a reasonable minimum. (This requirement only applies to the heavy media equipment permitted in SWCAA 01-2332R1.)</p> <p>[SWCAA 01-2332R1 Section 15(c) - 4/23/02]</p>	EU-2	M3 Complaints
Req-20	<p>Water shall be applied to Run of Mine facility areas (paved and unpaved) as necessary to control sources of fugitive emissions. (This requirement only applies to the heavy media equipment processing area permitted in SWCAA 01-2332R1.)</p> <p>Reference Method: SWCAA Method 9</p> <p>[SWCAA 01-2332R1 Section 15(d) - 4/23/02]</p>	EU-2	M2 Fugitive Emissions
Req-21	<p>Additional dust suppression water spray nozzles and equipment shall be added, as necessary, to control fugitive dust from the processing equipment in the event that processes or weather patterns change resulting in insufficient water spray application to control fugitive dust from crushing operations. (This requirement only applies to the heavy media equipment permitted in SWCAA 01-2332R1.)</p> <p>Reference Method: SWCAA Method 9</p> <p>[SWCAA 01-2332R1 Section 15(e) - 4/23/02]</p>	EU-2	M2 Fugitive Emissions, M6 Coal Processing
Req-22	<p>VOC emissions shall not exceed 1.5 tons per year.</p> <p>Reference Method: Material balance</p> <p>[SWCAA 97-1995R1 Section 12(a) - 11/22/00]</p>	EU-6	M7 Sandblasting and Spray Coating
Req-23	<p>Emissions of toxic air pollutants (TAPs) shall not exceed the small quantity emission rate for each TAP as defined in WAC 173-460.</p> <p>Reference Method: Material balance</p> <p>[SWCAA 97-1995R1 Section 12(b) - 11/22/00]</p>	EU-6	M7 Sandblasting and Spray Coating

Req. #	Requirement	Emission Point	Monitoring
Req-24	<p>Emission of particulate matter from spray coating and sandblasting operations shall not exceed 0.5 tons per year. Particulate matter emissions from spray coating shall be calculated using the total quantity of coatings sprayed, the average solids content of the coatings, a spray gun transfer efficiency of 65%, and a combined PM filter control efficiency of 98%. Particulate matter emissions from sandblasting operations shall be calculated using total blast media usage, an emission factor of 0.041 pounds of particulate matter per pound of blast media and a dust collector control efficiency of 99.9%. It is assumed that if the blast booth is not vented to the ambient air, no emissions will be generated.</p> <p>Reference Method: Material balance</p> <p>[SWCAA 97-1995R1 Section 12(c) - 11/22/00]</p>	EU-1 & EU-6	M7 Sandblasting and Spray Coating
Req-25	<p>Opacity shall not exceed zero percent for more than 3 minutes in any one hour period as determined by a Certified Observer certified in accordance with 40 CFR 60, Appendix A, Method 9 as provided in SWCAA 400, Appendix A.</p> <p>Reference Method: SWCAA Method 9</p> <p>[SWCAA 97-1995R1 Section 12(d) - 11/22/00]</p>	EU-1 & EU-6	M1 Visible Emissions
Req-26	<p>A differential pressure gage shall be installed on the Air Seal filter housing in the exhaust of the spray coating area to measure total pressure drop across the filtration media. The differential pressure gage shall be maintained in functioning order at all times during operation.</p> <p>[SWCAA 97-1995R1 Section 12(e) - 11/22/00]</p>	EU-6	M7 Sandblasting and Spray Coating
Req-27	<p>A differential pressure gage shall be installed to measure total pressure drop across the dust collector used to control emissions of PM from sandblasting operations. The differential pressure gage shall be maintained in functioning order at all times during operation.</p> <p>[SWCAA 97-1995R1 Section 12(f) - 11/22/00]</p>	EU-1	M7 Sandblasting and Spray Coating
Req-28	<p>The Air Seal filter housing shall be equipped with two stages of PM filters at all times during spray coating operations. Primary PM filters shall possess a minimum arrestance efficiency of 85%. Secondary PM filters shall possess a minimum arrestance efficiency of 92%.</p> <p>[SWCAA 97-1995R1 Section 12(g) - 11/22/00]</p>	EU-6	M4 Operations
Req-29	<p>The blast booth dust collector shall utilize filtration media with a collection efficiency of at least 99.9% for particles greater than 0.2 μm in diameter.</p> <p>[SWCAA 97-1995R1 Section 12(h) - 11/22/00]</p>	EU-1	M4 Operations

Req. #	Requirement	Emission Point	Monitoring
Req-30	<p>All windows and doors shall be kept closed during spray coating and sandblasting operations except to enable the movement of products into or out of the building. Exceptions to this requirement are allowed only when equipment pieces are too large to be fully enclosed.</p> <p>[SWCAA 400-070(8) - 12/14/06 Local Only SWCAA 97-1995R1 Section 12(i) - 11/22/00]</p>	EU-1 & EU-6	N/A
Req-31	<p>All containers of materials containing VOCs for spray coating activities shall be kept securely closed with a lid in place except when materials are being added, mixed, or removed. All materials containing VOCs used to clean and/or flush spray equipment or lines during cleanup shall be collected in a closed container.</p> <p>[SWCAA 97-1995R1 Section 12(j) - 11/22/00]</p>	EU-6	N/A
Req-32	<p>Operations which cause or contribute to odors which unreasonably interfere with any other property owner's use and enjoyment of their property shall use recognized good practice and procedures to reduce these odors to a reasonable minimum.</p> <p>[WAC 173-400-040(4) – 2/10/05 State Only SWCAA 400-040(4) - 12/14/06 Local Only SWCAA 97-1995R1 Section 12(k) - 11/22/00]</p>	EU-1 & EU-6	M3 Complaints
Req-33	<p>Emissions of nitrogen oxides from the 210 horsepower diesel engine (TransAlta ID 5452) shall not exceed 6.51 tons per year. Annual emissions shall be calculated using an emission factor of 0.031 lb/hp-hr unless a more accurate emission factor becomes available from the manufacturer or from engine-specific source testing.</p> <p>Reference Method: EPA Method 7E</p> <p>[SWCAA 07-2758 Condition 1 – 11/21/07]</p>	EU-7	M8 Diesel Engines
Req-34	<p>Emissions of carbon monoxide from the 210 horsepower diesel engine (TransAlta ID 5452) shall not exceed 1.40 tons per year. Annual emissions shall be calculated using an emission factor of 0.00668 lb/hp-hr unless a more accurate emission factor becomes available from the manufacturer or from engine-specific source testing.</p> <p>Reference Method: EPA Method 10</p> <p>[SWCAA 07-2758 Condition 2 – 11/21/07]</p>	EU-7	M8 Diesel Engines

Req. #	Requirement	Emission Point	Monitoring
Req-35	<p>Emissions of nitrogen oxides from Pump Engines #5453 and #5454 shall not exceed 15.59 tons per year each. Annual emissions shall be calculated using an emission factor of 3.56 lb/hr unless a more accurate emission factor becomes available from the manufacturer or from engine-specific source testing.</p> <p>Reference Method: EPA Method 7E</p> <p>[SWCAA 07-2758 Condition 3 – 11/21/07]</p>	EU-7	M8 Diesel Engines
Req-36	<p>Emissions of carbon monoxide from Pump Engines #5453 and #5454 shall not exceed 2.85 tons per year each. Annual emissions shall be calculated using an emission factor of 0.65 lb/hr unless a more accurate emission factor becomes available from the manufacturer or from engine-specific source testing.</p> <p>Reference Method: EPA Method 10</p> <p>[SWCAA 07-2758 Condition 4 – 11/21/07]</p>	EU-7	M8 Diesel Engines
Req-37	<p>Emissions of nitrogen oxides from the Southeast Packwood Spoils Sump Engine shall not exceed 3.84 tons per year. Annual emissions shall be calculated using an emission factor of 0.88 lb/hr unless a more accurate emission factor becomes available from the manufacturer or from engine-specific source testing.</p> <p>Reference Method: EPA Method 7E</p> <p>[SWCAA 07-2758 Condition 5 – 11/21/07]</p>	EU-7	M8 Diesel Engines
Req-38	<p>Emissions of carbon monoxide from the Southeast Packwood Spoils Sump Engine shall not exceed 2.54 tons per year. Annual emissions shall be calculated using an emission factor of 0.58 lb/hr unless a more accurate emission factor becomes available from the manufacturer or from engine-specific source testing.</p> <p>Reference Method: EPA Method 10</p> <p>[SWCAA 07-2758 Condition 6 – 11/21/07]</p>	EU-7	M8 Diesel Engines
Req-39	<p>Emissions of nitrogen oxides from the Sump 84 Pump Engine shall not exceed 6.52 tons per year. Annual emissions shall be calculated using an emission factor of 1.49 lb/hr unless a more accurate emission factor becomes available from the manufacturer or from engine-specific source testing.</p> <p>Reference Method: EPA Method 7E</p> <p>[SWCAA 07-2758 Condition 7 – 11/21/07]</p>	EU-7	M8 Diesel Engines

Req. #	Requirement	Emission Point	Monitoring
Req-40	<p>Emissions of carbon monoxide from the Sump 84 Pump Engine shall not exceed 5.65 tons per year. Annual emissions shall be calculated using an emission factor of 1.29 lb/hr unless a more accurate emission factor becomes available from the manufacturer or from engine-specific source testing.</p> <p>Reference Method: EPA Method 10</p> <p>[SWCAA 07-2758 Condition 8 – 11/21/07]</p>	EU-7	M8 Diesel Engines
Req-41	<p>Visible emissions from the 210 horsepower diesel engine (TransAlta ID 5452), Pump Engine #5453, Pump Engine #5454, the Southeast Packwood Spoils Sump Engine, and the Sump 84 Pump Engine shall not exceed five percent opacity for more than 3 minutes in any one hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400) except during startup. The startup period ends when the earlier of the following operating events occurs:</p> <ul style="list-style-type: none"> (a) The engine has reached normal operating temperature; or (b) The engine has been operating for 15 minutes. <p>Reference Method: SWCAA Method 9</p> <p>[SWCAA 07-2758 Condition 9 – 11/21/07]</p>	EU-7	M1 Visible Emissions
Req-42	<p>The 210 horsepower diesel engine (TransAlta ID 5452) shall not operate more than 2,000 hours per year. A nonresettable time totalizer shall be installed, maintained operable, and used to measure hours of operation.</p> <p>[SWCAA 07-2758 Condition 10 – 11/21/07]</p>	EU-7	M8 Diesel Engines
Req-43	<p>For Pump Engines #5453, #5454, the Southeast Packwood Spoils Sump Engine, and the Sump 84 Pump Engine, a nonresettable time totalizer shall be installed on each engine, maintained operable, and used to measure hours of operation.</p> <p>[SWCAA 07-2758 Condition 11 – 11/21/07]</p>	EU-7	N/A
Req-44	<p>Pump Engines #5453 and #5454 shall only be fired on #2 fuel oil or better. The sulfur content of the fuel fired in Pump Engines #5453 and #5454 shall not exceed 0.05% by weight effective January 1, 2008. The sulfur content of the fuel fired in the Southeast Packwood Spoils Sump Engine and the Sump 84 Pump Engine shall not exceed 0.05% by weight. The sulfur content of the fuel fired in the Southeast Packwood Spoils Sump Engine and the Sump 84 Pump Engine shall not exceed 0.0015% by weight effective October 1, 2010. A fuel certification from the fuel supplier may be used to demonstrate compliance with this requirement.</p> <p>[SWCAA 07-2758 Condition 12 – 11/21/07]</p>	EU-7	M8 Diesel Engines

¹ This list is not meant to exclude equivalent or superior test methods.

VII. MONITORING TERMS AND CONDITIONS

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 except as indicated.

M1. Visible Emission Monitoring WAC 173-401-615(1) - [10/17/02]
SWCAA 01-2332R1 Section 15(g) - [4/23/02]

This monitoring requirement applies to Requirements 1, 2, 8, 11, 13, 18, 25, and 41.

The permittee shall perform monthly inspections of EU-1, EU-2, and EU-6 during daylight hours to identify potential particulate matter emissions violations. Visible emission from EU-3 through EU-5 and EU-7 shall be inspected if indicated by a complaint or if otherwise unusual emissions are observed. Inspections shall consist of an initial survey of the affected equipment. Whenever visible emissions are apparent during the initial survey, SWCAA Method 9 shall be used to determine the opacity of emissions. If an opacity observation of EU-2 is necessary, both EPA Method 9 and SWCAA Method 9 shall be utilized to demonstrate compliance with the NSPS and state/local standards respectively.

Whenever fallout of particulate matter beyond the permittee's property boundary sufficient to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited, or visible emissions in excess of the standard are observed during the monthly inspection, or any other time, the permittee shall determine which equipment is causing the emissions. The permittee shall initiate corrective action within 2 hours of observing particulate matter fallout or excess visible emissions. The permittee shall confirm whether the pertinent equipment is or is not experiencing a malfunction and whether all relevant air pollution control equipment is operating properly. Within 24 hours of initial discovery, permittee shall resolve the particulate matter fallout or excess emissions problem, or notify SWCAA by the next working day of progress made in resolving the operational 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, K1(a & b) of this permit.

M2. Fugitive Emissions Monitoring WAC 173-401-615(1) - [10/17/02]
SWCAA 01-2332R1 Section 15(g) [4/23/02]

This monitoring requirement applies to Requirements 2, 3, 7, 12, 13, 15, 16, 17, 18, 20, and 21.

The permittee shall perform monthly inspections of emission units EU-1, EU-2, and EU-6 during daylight hours to identify any excess fugitive emissions, including fugitive dust. Inspections of EU-3 through EU-5 shall be conducted if indicated by a complaint or if otherwise unusual emissions are observed. Whenever fugitive emissions, including excessive fugitive dust, are observed during the monthly inspection or any other time, the permittee shall verify the source of the emissions. The permittee shall within 2 hours of discovery initiate investigation of the equipment involved to confirm whether the equipment is or is not experiencing a

malfunction, and whether reasonable precautions and good work practices are being employed to minimize emissions.

For EU-2, reasonable precautions and good work practices include, but are not limited to, the following:

- a. Applying water and/or chemical dust suppressants to coal entering conveyors or other process or transfer points daily when fugitive dust from coal handling operations is routinely observed to have an opacity of 20% or greater, or more frequently as necessary to minimize fugitive coal dust consistent with Requirements 15 and 20; and
- b. Using a water truck to apply water to paved and unpaved traffic areas of the Run of Mine facility on a daily basis during periods when fugitive dust from these areas is routinely observed to be 20% opacity, or more frequently as necessary, to minimize fugitive road dust.

Records of monitoring activities shall be maintained in accordance with Section VIII K1(a & b) of this permit.

M3. Complaint Monitoring WAC 173-401-615(1) - [10/17/02]

This monitoring requirement applies to Requirements 2, 4, 5, 7, 14, 19, and 32.

The permittee shall record, and maintain record of, any complaints received by either the permittee or SWCAA. All complaints shall be investigated no later than one workday after the permittee has been notified, and those complaints subject to requirement M2 shall be addressed in a timely manner consistent with M2. Permittee shall investigate the validity of each complaint and the cause of any emissions that prompted the complaint, and initiate corrective action, if needed, in response to the complaint. Within 24 hours of notification and investigation, permittee shall resolve the subject of the complaint, or notify SWCAA by the next working day of progress made in resolving the complaint. Records of monitoring activities shall be maintained in accordance with Section VIII K1(b) of this permit.

M4. Operations Monitoring WAC 173-401-615(1) - [10/17/02]

This monitoring requirement applies to Requirements 3, 8, 28, and 29.

The permittee shall perform monthly inspections of emission units EU-1, EU-2, and EU-6 during daylight hours to confirm that pollution control equipment is operating according to manufacturer specifications and/or consistent with good engineering and maintenance practices. Whenever nonstandard conditions are observed during the monthly inspection or any other time, the permittee shall initiate corrective action within 2 hours of observing an equipment problem. The permittee shall confirm whether the equipment is or is not experiencing a malfunction, and that all air pollution control equipment is operating properly. The permittee shall review maintenance records as necessary to monitor the operations of air pollution control equipment. 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 K1(a) and (c) of this permit.

M5. Performance Testing Requirements

40 CFR 60.254 - [7/1/01]
 WAC 173-400-115 – [6/8/07 State Only]
 SWCAA 400-115 – [12/14/06 Local Only]
 SWCAA 01-2332R1 Appendix B - [4/23/02]

This monitoring requirement applies to Requirements 11 and 18.

The permittee shall conduct an initial performance test of the new Run of Mine coal processing system to demonstrate compliance with 40 CFR 60.250 et seq. (Subpart Y) – "Standards of Performance for Coal Preparation Plants." In accordance with Subpart Y, a compliance test for visual emissions (opacity) utilizing EPA Method 9 shall be conducted no later than 60 days after achieving the maximum production rate at which the facility will be operated, but no later than 180 days after initial startup. A comprehensive test plan shall be submitted to SWCAA for review and approval at least 30 days prior to the test. SWCAA personnel shall be informed at least 30 days prior to testing so that they may be present during testing. Opacity observations shall be made at each conveyor belt transfer point and the crusher. The duration of each observation shall be at least three hours.

Records of the performance testing shall be maintained in accordance with Section VIII K1(d) of this permit.

M6. Coal Processing Monitoring Requirements

SWCAA 94-1641R1 Section 10(e)(i) – [6/28/96]
 SWCAA 01-2332R1 Section 15(h)(3 & 4) - [4/23/02]

This monitoring requirement applies to Requirements 12, 15, 16, 17, and 21.

The permittee shall develop and maintain the following information for the Jig Plant and associated coal processing equipment:

- a. Annual total coal production quantities.

The permittee shall develop and maintain the following information for the Heavy Media Plant and associated coal processing equipment:

- b. Dust suppression equipment maintenance activities shall be recorded for each occurrence; and
- c. The quantity of material crushed and processed shall be recorded monthly.

Records of monitoring activities shall be maintained in accordance with Section VIII K1(a) of this permit.

M7. Sandblasting and Spray Coating Monitoring Requirements

SWCAA 97-1995R1 Section 12(l) - [11/22/00]

This monitoring requirement applies to Requirements 22, 23, 24, 26, and 27.

The permittee shall develop and maintain the following information for EU-1 and EU-6:

- a. MSDS information for all VOC, TAP, and HAP containing products used at the facility;
- b. Consumption of all VOC, TAP, and HAP containing products used at the facility shall be recorded monthly;
- c. Dust collector maintenance activities and filter replacements shall be recorded for each occurrence;
- d. The quantity of blast media usage shall be recorded monthly; and
- e. Differential pressure across the spray booth and blast booth filtration systems shall be recorded for each day of operation.

Records of monitoring activities shall be maintained in accordance with Section VIII K1(a) of this permit.

M8. Diesel Engines Monitoring

WAC 173-401-615(1) - [10/17/02]

SWCAA 07-2758 Conditions 12 & 15(a) – [11/21/07]

This monitoring requirement applies to Requirements 33, 34, 35, 36, 37, 38, 39, 40, 42, and 44.

The hours of operation of each stationary diesel engine shall be recorded for each calendar year.¹

The permittee shall maintain an analysis of the sulfur content of each shipment of fuel oil for Pump Engines #5453 and #5454 and the Southeast Packwood Spoils Sump Engine. A certification from the fuel supplier satisfies this requirement.

Records of monitoring activities shall be maintained in accordance with Section VIII K1(a) of this permit.

¹ Although this section does not generally apply to IEUs, hours of operation must be determined for each of the stationary diesel engines at this facility that are identified as IEUs in order to generate the emissions inventory required by condition R5 of this permit, and to demonstrate that the emission unit has remained insignificant.

VIII. RECORDKEEPING TERMS AND CONDITIONS

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 (except as described in M9). The permittee shall maintain records of required monitoring per M1 through M9 as follows if applicable:

K1. General Recordkeeping

WAC 173-401-615(2) - [10/17/02]

SWCAA 97-1995R1 Section 12(l) – [11/22/00]

SWCAA 01-2332R1 Section 15(h) - [4/23/02]

SWCAA 07-2758 Condition 16 – [11/21/07]

Permittee is required to keep the following records:

- (a) Inspections & Certifications
 - (i) The date, place, and time of the 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 Sections VI and VII of this permit; and
 - (v) Corrective action taken in response to permit deviations and when such 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 such action was initiated.

- (c) Upset Conditions

- (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 TERMS AND CONDITIONS

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 99th Street, Suite 1294
Vancouver, WA 98682-2454

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 - [2/10/05]
WAC 173-401-615(3)(b) - [10/17/02]
SWCAA 400-107 – [9/21/95 SIP, 12/14/06 Local Only]
SWCAA 97-1995R1 Sections 12(l)(1) and 26 - [11/22/00]
SWCAA 01-2332R1 Sections 15(i)(1) and 27 – [4/23/02]
SWCAA 07-2758 Condition 19 – [11/21/07]

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 deviation; and
 - (iii) The corrective action taken and when the corrective action was initiated.

For EU-1, EU-2, EU-6, and EU-7 excess emissions shall be reported as soon as possible. In accordance with SWCAA 400-107(1), 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. The permittee shall report the upset condition by telephone, e-mail or facsimile as initial notification to SWCAA; a message may be left on the answering machine for conditions outside of normal business hours.

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

The permittee shall report all complaints to SWCAA within three business 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]

Consistent with WAC 173-401-615(3) the permittee shall submit to SWCAA by October 15th and April 15th for the six month periods January through June and July through December respectively, a report on the status of all monitoring requirements. All instances of deviation from permit requirements shall be clearly identified. 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. The semi-annual report shall contain a certification of any reports submitted during the semi-annual period that have not already been certified. The certification shall be consistent with WAC 173-401-520.

R4. Annual Reports and Compliance Certification

WAC 173-401-630(5) - [11/4/93]

SWCAA 94-1641R1 Appendix A – [6/28/96]

SWCAA 97-1995R1 Section 12(m)(2 – 4) – [11/22/00]

SWCAA 01-2332R1 Section 15(i)(2) – [4/23/02]

SWCAA 07-2758 Condition 18(a) – [11/21/07]

(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 15th 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 15th for the previous calendar year:

- (i) The consumption of all VOC, TAP, and HAP containing products used at the facility (EU-1 and EU-6 only);
- (ii) The amounts and types of hazardous waste disposed for the calendar year (EU-1 and EU-6 only);
- (iii) The quantity of blast media used (EU-1 only);
- (iv) The quantity of ROM coal crushed and processed (EU-2); and
- (v) The hours of operation of each diesel engine for the previous calendar year.

- R5. Emission Inventory Reports** WAC 173-400-105 - [9/20/93 SIP, 6/8/07 State Only]
 SWCAA 400-105 - [9/21/95 SIP, 12/14/06 Local Only]
 SWCAA 94-1641R1 Appendix A – [6/28/96]
 SWCAA 97-2995R1 Section 12(m)(5) – [11/22/00]
 SWCAA 01-2332R1 Section 15(i)(3) – [4/23/02]
 SWCAA 07-2758 Condition 18(b) – [11/21/07]

The permittee shall submit an inventory of annual emissions from the source each calendar year to SWCAA by March 15th of the following year in accordance with SWCAA 400-105. The inventory shall include stack and fugitive emissions of NO_x, SO₂, CO, VOC, PM, PM₁₀, PM_{2.5}, and toxic air pollutants identified in WAC 173-460.

- R6. Source Test Reports** WAC 173-401-615(3) - [10/17/02]
 SWCAA 400-106 – [12/14/06 Local Only]
 SWCAA 01-2332R1 Appendix B – [4/23/02]

Reports of all required source or emissions testing shall be submitted to SWCAA 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]

This section lists all federal, state, and/or local requirements which might reasonably apply to the permittee, but are deemed nonapplicable after review by SWCAA. In accordance with WAC 173-401-640, the Permittee is provided a permit shield for not complying with the requirements listed below where they have been identified to be non-applicable to specific emission units.

1. Standards of Performance for Nonmetallic Mineral Processing Plants

40 CFR 60.670 *et seq.* (Subpart OOO) - [7/1/04]

WAC 173-400-115 adoption of Subpart OOO – [6/8/07 State Only]

SWCAA 400-115 adoption of Subpart 000- [12/14/06 Local Only]

Subpart 000 applies to nonmetallic mineral processing plants for which construction, reconstruction or modification commenced after August 31, 1983, subject to some exemptions. The list of nonmetallic minerals subject to regulation by Subpart 000 does not include coal. Therefore, this regulation is not applicable.

2. Prevention of Significant Deterioration, Review of Major Stationary Sources and Major Modifications - Source Applicability and Exemptions 40 CFR 52.21(i) - [7/1/04]

This section applies to all major stationary sources and major modifications with respect to each regulated pollutant, except as otherwise provided in this section. Requirements of this section shall not apply to a particular major stationary source or major modification if construction commenced on the source or modification before August 7, 1977. The permittee's facility became a major source due to the sale of the mine to TransAlta Centralia Mining, LLC on May 4, 2000, and has not since undergone modification that would trigger the requirement. Therefore, this regulation is not applicable. The sale of the mine brought the mine and adjacent power plant (itself a major source) under common ownership.

3. Registration Program WAC 173-400-099 - [2/10/05 State Only]
SWCAA 400-100(2) - [9/21/95 SIP, 12/14/06 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(1)(b) air operating permit sources are exempt from the registration requirements of SWCAA 400-100.

4. Requirements for Sources in a Maintenance Plan Area
SWCAA 400-111 - [11/21/96 SIP, 12/14/06 Local Only]

The permittee is not located in a maintenance plan area for any criteria pollutant. Therefore, this regulation is not applicable.

5. Requirements for New Sources in Nonattainment Areas
WAC 173-400-112 - [9/20/93 SIP, 2/10/05 State Only]
SWCAA 400-112 - [11/21/96 SIP, 12/14/06 Local Only]

The permittee is not located in a nonattainment area for any criteria pollutant. Therefore, this regulation is not applicable.

6. Bubble Rules WAC 173-400-120 - [2/10/05 Local Only]
SWCAA 400-120 - [12/14/06 Local Only]

The permittee has not requested an emission bubble for any regulated pollutant. Therefore, this regulation is not applicable.

7. Acquisition and Use of Emission Reduction Credits

SWCAA 400-130 - [12/14/06 Local Only]

The permittee has neither sought nor been issued emission reduction credits (ERCs). Therefore, this regulation is not applicable.

8. Creditable Stack Height and Dispersion Techniques

WAC 173-400-200 - [3/22/91 SIP, 2/10/05 State Only]

SWCAA 400-200 - [9/21/95 SIP, 12/14/06 Local Only]

No source may use dispersion techniques or excess stack height to meet ambient air quality standards or PSD increment limitations. The vast majority of pollutants emitted from this facility are fugitive, therefore stack height is not applicable. Since the time this facility was designated major, the facility has not undergone modification that would trigger the requirement. Therefore, this regulation is not applicable.

APPENDIX A**SWCAA METHOD 9
VISIBLE OPACITY DETERMINATION METHOD**1. Principle

The opacity of emissions from stationary sources is determined visually by a qualified observer.

2. Procedure

The observer must be certified in accordance with the provisions of Section 3 of 40 CFR Part 60, Appendix A, Method 9, as in effect on July 1, 2002.

2.1 Position

The observer shall stand at a distance sufficient to provide a clear view of the emissions with the sun oriented in the 140° sector to his/her back. Consistent with maintaining the above requirement, the observer shall, as much as possible, make his/her observations from a position such that his/her line of vision is approximately perpendicular to the plume direction, and when observing opacity of emissions from rectangular outlets (e.g., roof - monitors, open baghouses, noncircular stacks), approximately perpendicular to the longer axis of the outlet. The observer's line of sight should not include more than one plume at a time when multiple stacks are involved, and in any case, the observer should make his/her observations with his/her line of sight perpendicular to the longer axis of such a set of multiple stacks (e.g., stub stacks on baghouses).

2.2 Field Records

The observer shall record the name of the plant, emission location, type of facility, observer's name and affiliation, a sketch of the observer's position relative to the source, and the date on a field data sheet. The time, estimated distance to the emission location, approximate wind direction, estimated wind speed, description of the sky condition (presence and color of clouds), and plume background are recorded on a field data sheet at the time opacity readings are initiated and completed.

2.3 Observations

Opacity observations shall be made at the point of greatest opacity in that portion of the plume where condensed water vapor is not present. The observer shall not look continuously at the plume, but instead shall observe the plume momentarily at 15 second intervals.

2.3.1 Attached Steam Plumes

When condensed water vapor is present within the plume as it emerges from the emission outlet, opacity observations shall be made beyond the point in the plume at which condensed water vapor is no longer visible. The observer shall record the

approximate distance from the emission outlet to the point in the plume at which the observations are made.

2.3.2 Detached Steam Plumes

When water vapor in the plume condenses and becomes visible at a distinct distance from the emission outlet, the opacity of emissions should be evaluated at the emission outlet prior to the condensation of water vapor and the formation of the steam plume.

2.4 Recording Observations

Opacity observations shall be recorded to the nearest 5 percent at 15 second intervals on a field data sheet. A minimum of 24 observations shall be recorded. Each momentary observation recorded shall be deemed to represent the average opacity of emissions for a 15 second period.

2.5 Data Reduction

The number of observation at each opacity level shall be determined and recorded on the field data sheet. Opacity shall be determined by the highest 13 observations in any consecutive 60-minute period. The opacity standard or emissions limit is exceeded if there are more than 12 observations during any consecutive 60 minute period for which an opacity greater than the standard or emission limit is recorded. The opacity standard is a 1 hour standard (rolling 60 minutes). Only one violation of the standard per hour may be recorded meaning that a violation for any given consecutive 60 minute period may be recorded in substantially fewer than 60 minutes. No one hour time sets shall overlap for purpose of determining a violation or violations. Data used to establish a violation in one consecutive 60 minute period can not be used to establish a violation in a second consecutive 60 minute period. The opacity determination shall be recorded on the observational record sheet.

3. References

Federal Register, Vol. 36, No. 247, page 24895, December 23, 1971.

"Criteria for Smoke and Opacity Training School 1970 - 1971" Oregon-Washington Air Quality Committee."

"Guidelines for Evaluation of Visible Emissions" EPA 340/1-75-007