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Original Issuance: October 10, 2005
 Supersedes OAC #695A

**Northwest Clean Air Agency (NWCAA) hereby issues
 Order of Approval to Construct (OAC) #933**

Project Summary: Pacific Woodtech Corporation submitted an application on July 20, 2005 for installation of a second laminated veneer lumber (LVL) manufacturing line at 1850 Park Lane, Burlington, Washington. The facility will use a continuous press to produce a billet of laminated softwood from pre-dried veneer which is then cut to produce headers and I-beams. To support the LVL line, a 9.0 mmBtu/hr natural gas fired thermal oil heater, hooding and venting equipment, and a Superior Systems Model 13-416-10 baghouse will be added. The facility will emit two toxic air contaminants, formaldehyde and methanol, from the pressing operation, and criteria pollutants from the support equipment. With the startup of the Line 2 Press, the facility will become subject to the Air Operating Permit program.

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Robert Shroeder
 Operations Manager
 Pacific Woodtech Corporation
 1850 Park Lane
 Burlington, WA 98233

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FACILITY LOCATION:

1850 Park Lane, Burlington, WA 98233

Best Available Control Technology for Toxics (TBACT) for the Line 2 Press is determined to be no active control technology. Best Available Control Technology (BACT) for criteria pollutants from the associated cutting and shaping activities is a particulate matter collection system and baghouse achieving 0.01 grains/dscf PM10 emissions as demonstrated by a manufacturer's guarantee and a source test on a similar unit/operation. BACT for the associated 9.0 MMBtu/hr thermal fluid heater for nitrogen oxides (NOX) is a low NOx burner (30 ppm_{dv}).

Note that in addition to other applicable rules and regulations, this project is subject to applicable portions of the following federal regulations:

National Emission Standards for Hazardous Air Pollutants / Maximum Achievable Control Technology Standards

- Subpart A – General Provisions
- Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products

Permit History

- Conditions specified in Order of Approval to Construct #695A have been incorporated into this permit. This permit, OAC #933, supersedes OAC #695A.
- OAC #933 is based on the assumption that the facility's potential to emit methanol is greater than ten tons a year, the threshold under which the facility is subject to the Air Operating Permit (AOP) program. If the facility is ultimately determined to be not subject to the AOP program, an application to modify OAC #933 must be provided within two months of the determination.

As authorized by Northwest Clean Air Agency Regulation Section 300, this order is issued subject to the following restrictions and conditions:

1. All resin usage and purchase shall be tracked. Records of all resin usage shall be kept on-site and available to NWCAA inspectors for at least five years. Annually, an emissions inventory shall be submitted to the NWCAA no later than April 15th of each year, unless an extension is requested and granted.
2. Formaldehyde emissions from both presses shall be calculated using the emission factor of 1.35E-04 pounds per pound of Cascophen SF 54773 PWT-2.5 resin used. This factor is based on the manufacturer's specifications assuming 15% of the formaldehyde is unreacted and emitted. Methanol emissions from both presses shall be calculated using the emission factor of 1.30E-03 pounds per pound of Cascophen resin. This factor is based on the manufacturer's specifications assuming all methanol is emitted. Alternative emission factors may be approved by the NWCAA upon written request by the facility and demonstration that other emission factors better represent actual emissions.
3. The NWCAA shall be notified and an MSDS sheet submitted prior to changing resin, catalyst, I-joist adhesive, or lube oil products.
4. Resins, solvents and organic liquid wastes shall be kept in covered containers when not in use.
5. All heaters shall burn only natural gas.
6. Visual emissions from the baghouses shall not exceed 5% opacity for more than three minutes in any one-hour period, as measured by Washington State Department of Ecology Source Test Method 9a.
7. Compliance with Condition 6 shall be monitored by observing the baghouses' exhaust for visible emissions monthly for six consecutive months. Visible emissions detected for more than two minutes shall be reduced to 0% opacity or monitored by Ecology Method 9A as soon as possible and no later than twenty four hours after detection. If, at the end of the six month period of monthly monitoring, visual emissions have consistently been zero, monitoring may become quarterly. If visible emissions are detected for more than two minutes during any quarterly observation, inspection frequency shall revert to monthly until six consecutive months of acceptable observations are recorded. Record results of observations, periods of opacity greater than 0% monitored by facility personnel, any related equipment or operational failure, the occurrence dates and the action taken to resolve the problem(s). A request must be made to the NWCAA if the facility wishes to progress to quarterly monitoring. Keep records of all observations available to the NWCAA for inspection.
8. There shall be no visual emissions from the baghouse fines collection hopper, except during maintenance activities and periods when hopper fines are transferred to a container for load out.
9. A differential pressure gauge shall be installed on each baghouse to assist in monitoring

performance. The acceptable differential pressure range, as established by the manufacturer or through engineering judgment, shall be written on or near the gauge and included in the facility's operation and maintenance plan. Once per operating day, each gauge shall be checked to ensure that each baghouse is operating within the established range. If the unit is not operating within the acceptable range, equipment shall be shut down immediately and operation shall not resume until the problem has been identified and corrected.

10. A written log of the differential pressure gauge readings shall be maintained at the facility. The log shall include any bag failures or repairs, the time and date that the inspection or repair was conducted, and the initials of the individual performing the inspection or repair.
11. A written operation and maintenance (O/M) manual shall be developed for the baghouses and kept up-to-date. The O/M manual shall be consistent with the manufacturer's recommendations and shall include internal inspection schedules, maintenance requirements and operating procedures. The O/M manual shall be kept on-site and readily available for inspection by the NWCAA.
12. The Line 2 Press shall be equipped with a hood and vent exhausted through a vertical stack extending at least nine feet above the building's roof. Visible emissions from the exhaust stack of the second press line shall not exceed 10% opacity as measured by Method 9A.
13. The permittee shall demonstrate compliance with the Washington Administrative Code (WAC) Chapter 173-460 within eight weeks of permit issuance. Compliance may be demonstrated through (a) computer modeling, or (b) installation of a ninety-four foot above grade exhaust stack for the Line 2 Press prior to initial startup. A report certifying compliance with this condition shall be submitted to the NWCAA at the end of the eight week period.
14. Facility equipment shall be operated and maintained in accordance with the manufacturer's specifications, good operating practices, and Order of Approval to Construct conditions.
15. Sampling and testing facilities shall be provided and maintained for the Line 2 Press outfeed hood exhaust stack for both toxic air pollutant testing and opacity measurement.
16. Odors from the facility shall not result in a nuisance at or beyond the property boundary as determined by the NWCAA staff.
17. Written notification of initial startup of the second press line shall be submitted to the NWCAA no less than 20 days following startup.


Anne Naismith, PE Lynn Billington, PE James Randles
Permitting Engineer Reviewing Engineer Director