Air Operating Permit—Final

Sierra Pacific Industries
Mount Vernon, Washington

June 10, 2010
PERMIT INFORMATION
SIERRA PACIFIC INDUSTRIES
14353 McFarland Road, Mount Vernon, WA 98273

SIC: 2421
NAICS 321113, 321999, & 221119
EPA AFS: 53-057-00057

NWCAA ID: 915-V-S
UBI: 601-766-172

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Prepared by
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<th>Air Operating Permit Number:</th>
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<td>June 10, 2010</td>
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<td>December 28, 2007</td>
<td>June 10, 2014</td>
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ATTEST

This permit is issued in accordance with the provisions of Section 322 of the Regulation of the Northwest Clean Air Agency and the provisions of Chapter 173-401 Washington Administrative Code.

Pursuant to Section 322 of the Regulation of the Northwest Clean Air Agency and Chapter 173-401 Washington Administrative Code, Sierra Pacific Industries is authorized to operate subject to the terms and conditions of this permit.

Northwest Clean Air Agency Approval:

Theresa Mahar, P.E.
Permitting Engineer

Mark Buford, P.E.
Assistant Director
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SECTION 1    EMISSION UNIT IDENTIFICATION

The requirements identified in this permit apply to all air emissions from the Sierra Pacific Industries facility located at 14353 McFarland Road, Mount Vernon, Washington (hereinafter referred to as SPI or as the facility or as the permittee). Specific requirements for these processes are listed in SECTION 5 of this permit in addition to facility-wide requirements that appear in other sections in the permit.

Table 1-1 Processes at Sierra Pacific Industries (SPI)

<table>
<thead>
<tr>
<th>(Process No.) Name</th>
<th>Emission Points</th>
<th>Control Device</th>
<th>Process Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-1 Cogeneration Facility</td>
<td>Stack</td>
<td>Multiclone/ESP</td>
<td>Electrical generation using a turbine and high-pressure steam provided by a biomass-fired fired, 430 MMBtu/hr, 250,000 lb/hr steam, McBurney Corp, biomass-fired water-wall boiler with a vibrating grate, a steam turbine, and a generator. Generates up to 28 MW of electricity. Provides 2,190 MMB per year of low-pressure steam for heating.</td>
</tr>
<tr>
<td>EU-2 Cooling Tower</td>
<td>Vents</td>
<td>None</td>
<td>Condense steam</td>
</tr>
<tr>
<td>EU-3 Planer Mill</td>
<td>Stack</td>
<td>Baghouse</td>
<td>The sawmill is currently permitted to process 400 MMBf/yr of dimensional lumber.</td>
</tr>
<tr>
<td>EU-4 Dry Kilns</td>
<td>Vents</td>
<td>None</td>
<td>The dry kilns are currently permitted to process 400 MMBf/yr of dimensional lumber.</td>
</tr>
<tr>
<td>EU-5 Anti-mold Spray</td>
<td>Vent</td>
<td>Mist eliminator pad</td>
<td>Treat all cut lumber to protect the wood and improve lumber appearance.</td>
</tr>
</tbody>
</table>
SECTION 2    STANDARD TERMS AND CONDITIONS

Standard terms and conditions are administrative and/or other requirements that typically have no ongoing compliance monitoring requirements. The permittee must comply with the requirements listed below. All terms and conditions of this permit are enforceable by the Environmental Protection Agency (EPA) Administrator and by citizens under the Federal Clean Air Act (FCAA), except for those terms and conditions designated in the permit as “State Only”. A requirement designated “State Only” is enforceable only by the state or the NWCAA, and not by EPA or through citizen suits. Unless the text of the term is specifically identified to be “Directly Enforceable”, the language of the cited regulation takes precedence over a paraphrased requirement. A permit condition labeled “Directly Enforceable” is a legal requirement, and the permit shield in condition 2.3.1 of this permit applies.

2.1  Compliance Requirements

2.1.1  Duty to Comply

2.1.1.1  WAC 173-401-620(2)(a) (11/4/93)

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of RCW 70.94 and, for federally enforceable provisions, a violation of the Federal Clean Air Act (FCAA). Such violations are grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.

2.1.1.2  State Only: NWCAA 322.3 (11/12/99)

It shall be unlawful for any person to operate a source that is subject to the requirements of Chapter 173-401 WAC without complying with the provisions of Chapter 173-401 WAC and any permit issued under its authority.

2.1.2  Civil and Criminal Penalties

2.1.2.1  WAC 173-400-230(2) (3/20/93), WAC 173-400-240 (3/22/91), NWCAA 132 & 133 (10/13/94), and Section 113 of the FCAA

Civil and criminal penalties may be issued in accordance with the applicable regulations listed above.

2.1.2.2  State Only: NWCAA 132 & 133 (11/8/07)

Civil and criminal penalties may be issued in accordance with the applicable regulations listed above. Under this “State Only” version of NWCAA 132, criminal penalties may be assessed on a “per day, per violation” basis.

Any person who violates the provisions of the applicable chapters of the RCW or the Regulations of the Northwest Clean Air Agency (NWCAA) or aids and abets in a violation shall be subject to civil penalties as stated in the above regulations.

2.1.3  Need to Halt or Reduce Activity Not a Defense

WAC 173-401-620(2)(b) (11/4/93)

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 terms and conditions of this permit.
2.1.4 Duty to Provide Information

_WAC 173-401-620(2)(e) (11/4/93)_

The permittee shall furnish to the NWCAA, within a reasonable time, any information that the NWCAA 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 NWCAA copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the EPA Administrator along with a claim of confidentiality. The NWCAA shall maintain confidentiality of such information in accordance with RCW 70.94.205 and the NWCAA Regulation.

2.1.5 Confidential Information

2.1.5.1 _NWCA 114.1 (4/14/93)_

Whenever the permittee requests that records or information eligible for confidentiality status be made confidential by the Board of the NWCAA, the NWCAA shall maintain confidentiality of such information in accordance with NWCA 114. The records or information shall be only for the confidential use of the Board, the Advisory Council, and the NWCAA staff, but may not be accessed if, in the opinion of the Board, there is a conflict of interest.

2.1.5.2 _State Only: NWCA 114 (11/8/07)_

Whenever any records or other information other than ambient air quality data or emission data furnished to or obtained by the Agency, relates to processes or production unique to the owner or operator, or are likely to affect adversely the competitive position of such owner or operator if released to the public or to a competitor, and the owner or operator of such processes or production so certifies, such records or information shall be only for the confidential use of the NWCAA.

Nothing herein shall be construed to prevent the use of records or information by the NWCAA in compiling or publishing analyses or summaries relating to the general condition of the outdoor atmosphere: provided, that such analyses or summaries do not reveal any information otherwise confidential under the provisions of this section: provided further, that emission data furnished to or obtained by the Board shall be correlated with applicable emission limitations and other control measures and shall be available for public inspection during normal business hours at the office of the NWCAA.

2.1.6 Inspection and Entry

_WAC 173-400-105(3) (9/20/93), WAC 173-401-630(2) (11/4/93) NWCA 110 & 111 (1/8/69)_

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow Ecology, NWCAA or an authorized representative to:

(i) Enter upon the permittee’s premises where a Chapter 401 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) Have access to and copy, at reasonable times, any records that must be kept under the condition of the permit;

(iii) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
(iv) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

No person shall willfully interfere with or obstruct the Control Officer or any NWCAA employee and/or assigned agent in carrying out any lawful duty.

2.1.7 Investigation and Studies

*NWCAA 110 (1/8/69)*

The Control Officer and/or his qualified agents may make any reasonable investigation or study which is necessary for the purpose of standards or any amendments thereto on reducing the amount or kind of contaminant.

When investigating conditions specific to the control, recovery or release of air contaminants, the Control Officer or his duly authorized representatives shall have the power to enter at reasonable times upon any private or public property, except non-multiple unit private dwellings housing two families or less.

If an authorized employee of the Agency, during the course of an inspection desires to obtain a sample of air contaminant, he shall notify the owner or lessee of the time and place of obtaining a sample so the owner or lessee has the opportunity to take a similar sample at the same time and place. A receipt shall be given to the owner or lessee for the sample obtained.

2.1.8 Source Testing

2.1.8.1 *WAC 173-400-105(4) (9/20/93)*

To demonstrate compliance, Ecology or the NWCAA may conduct or require that a test be conducted of the source using approved EPA methods from 40 CFR 60 Appendix A which are adopted by reference, or approved procedures contained in the “Source Test Manual – Procedures for Compliance Testing,” state of Washington, Department of Ecology, as of July 12, 1990, on file at Ecology. The operator of a source may be required to provide the necessary platform and sampling ports for Ecology personnel or others to perform a test of an emissions unit. Ecology shall be allowed to obtain a sample from any emissions unit. The operator of the source shall be given an opportunity to observe the sampling and to obtain a sample at the same time.

2.1.8.2 *State Only: WAC 173-400-105(4) (6/8/07)*

To demonstrate compliance, the required test must be conducted using approved EPA methods from 40 CFR Parts 51, 60, 61 and 63 (in effect on October 1, 2006). All other language is the same as 2.1.8.1.

2.1.8.3 *State Only: NWCAA 367 and Appendix A (7/14/05)*

Source tests required by NWCAA to assess compliance with an air emission standard shall be conducted according to the following provisions:

(i) A source test plan shall be submitted to the NWCAA for approval for all compliance source tests at least 30 days prior to scheduled testing. A summary of the test shall accompany the test plan and be submitted on a template provided by the NWCAA.

(ii) Once a test plan has been approved, any changes in test dates or methodology shall require NWCAA approval.

(iii) Results of required source tests must be submitted within sixty days of completion of the test unless prior approval is granted by NWCAA.
2.1.9 Testing and Sampling

2.1.9.1 NWCAA 360.1 (2/14/73)
Any person operating or using any article, machine, equipment or other contrivance shall provide and maintain such sampling and testing facilities as specified in the Order of Approval to Construct or an Air Operating Permit.

2.1.9.2 State Only: NWCAA 367 and Appendix A (7/14/05)
All ambient monitoring, compliance testing, continuous monitoring systems and continuous opacity monitoring systems required by a regulation, order of approval or permit issued by the NWCAA shall comply with the applicable requirements of Section 367 and Appendix A of the NWCAA Regulation. The applicable requirements of Section 367 and Appendix A of the NWCAA Regulation are in addition to any monitoring, testing, calibration or quality assurance/quality control requirements that otherwise apply.

Any person operating an air operating permit source may, at any time, be required to monitor the ambient air, process emissions or conduct emission tests as deemed necessary by the Control Officer.

The Control Officer may take such samples and perform any tests and investigations deemed necessary to determine the accuracy of the monitoring reports and tests submitted to the Agency, and evaluate the validity of the data. The owner or operator may also be required by the Control Officer to take a sample using an approved procedure and submit the results thereof within a reasonable period of time.

Once initiated, a compliance test shall be completed unless interrupted by severe weather, test equipment failure or other conditions beyond control of the facility. Failure to complete a test shall be a violation of the requirement to test, and, in cases where the initial data indicate a non-compliance of the applicable emission standard, the results may be considered a violation of that standard.

2.1.10 Ambient Air and Continuous Emission Monitoring

2.1.10.1 NWCAA 365.1 (2/8/89)
Any person operating an air contaminant source or an air operating permit source may, at any time, be required to monitor the ambient air, process emissions or conduct emission tests as deemed necessary by the Control Officer under the following provisions:

The Board or Control Officer may require any person operating any source to conduct a monitoring program on site or adjacent off site for emissions, ambient air concentrations or any other pertinent special studies deemed necessary.

All monitoring data shall be submitted in a form which the Board or Control Officer may require. Averaging time and collection periods will be determined by the Control Officer. Failure to record and/or report data as specified in the “Guidelines for Industrial Monitoring Equipment and Data Handling” may be cause for a Notice of Violation to be issued.

All data and records shall be kept for a period of at least one year and made available to the Control Officer upon request.

All required continuous emission monitors or required opacity monitors used to monitor compliance and all instruments used for special studies must meet appropriate EPA performance specifications (40 CFR 60, Appendix B) and shall be calibrated and maintained in accordance with the “Guidelines for Industrial Monitoring Equipment and Data Handling”. 
procedures approved by the Control Officer.

The Control Officer may take such samples and make any tests and investigations deemed necessary to determine the accuracy of the monitoring reports and tests submitted to the NWCAA, and evaluate the validity of the data. The owner or operator may also be required by the Control Officer to take a sample using an approved procedure and submit the results thereof within a reasonable period of time.

The Board or the Control Officer may require additional reasonable monitoring be undertaken at any appropriate time to insure compliance with the NWCAA Regulation.

2.1.10.2 State Only: NWCAA 367 and Appendix A (7/14/05)

All ambient air monitors shall be operated and maintained as required by the appropriate Sections of 40 CFR Parts 50 and 58.

A Quality Assurance (QA) manual and station log book shall be kept for all stations. Written calibration and precision/span check procedures shall be included in the QA manual. A station audit shall be conducted by the NWCAA at least once per year.

Unless subject to acid rain regulations (40 CFR Part 72 and 75), all continuous emissions monitoring systems (CEMS) shall be capable of meeting appropriate EPA performance specifications using procedures outlined in 40 CFR Part 60 Appendix B. CEMS subject to acid rain regulations shall be capable of meeting the specifications outlined in the appropriate section of 40 CFR Part 75.

All CEMS shall be operated in accordance with the appropriate section of 40 CFR Part 60 Appendix F, and the operator shall assess the operation of each CEMS daily.

Continuous opacity monitors shall be maintained according to “Recommended Quality Assurance Procedures for Opacity Continuous Monitoring Systems” (EPA 340/1-86-10) and the manufacturer's procedures. All gaseous CEMS shall be maintained using the QA criteria of 40 CFR Part 60 Appendix F and the manufacturer’s procedures.

Auditing of opacity monitors shall be conducted according to recommended procedures. Data accuracy assessments shall be conducted at least once every calendar quarter for gaseous monitors and at appropriate periodic intervals. Relative Accuracy Test Audits (RATAs), Relative Accuracy Audits (RAAs) and Cylinder Gas Audits (CGAs) shall be employed as described in 40 CFR Part 60 (or 40 CFR Part 75 if the facility is subject to acid rain regulations).

Strip charts and approved data acquisition systems shall be used to capture and store data. All data must be retained for a period of at least five years and be available to the NWCAA upon request.

CEMS are required to maintain greater than 90% data availability on a monthly basis. A supplemental report shall be submitted if during any calendar month a CEMS fails to produce 90% data availability stating the reasons for the low data availability.

2.1.11 Credible Evidence

40 CFR 51.212(c) (2/24/97), 40 CFR 52.12 (2/24/97), and 40 CFR 52.33 (2/24/97)

For the purpose of compliance certifications or establishing whether or not a person has violated or is in violation of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.
2.2 Permit Terms

2.2.1 Permit Expiration and Renewal

WAC 173-401-610 (11/4/93) and WAC 173-401-710 (10/17/02)

This permit is issued for a fixed term of five years from date of issuance. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted. A complete permit renewal application shall be submitted to the NWCAA no later than the date established in the permit.

2.2.2 Permit Actions

WAC 173-401-620(2)(c) (11/4/93)

This permit may be modified, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

2.2.3 Emissions Trading

WAC 173-401-620(2)(g) (11/4/93)

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.

2.2.4 Emission Reduction Credits

State Only: WAC 173-400-136 (2/10/05)

An emission reduction credit may be used in accordance with the applicable regulation listed above.

2.2.5 Severability

WAC 173-401-620(2)(h) (11/4/93)

If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable.

2.2.6 Permit Appeals

WAC 173-401-620(2)(i) (11/4/93) and WAC 173-401-735 (5/3/97)

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 NWCAA within thirty days of receipt. This provision for appeal is separate from and in addition to any federal rights to petition and review under section 505(b) of the FCAA.

2.2.7 Permit Continuation

WAC 173-401-620(2)(j) (11/4/93)

This permit and all terms and conditions contained therein, including any permit shield provided under WAC 173-401-640, shall not expire until the renewal permit has been issued or denied if
a timely and complete application has been submitted. 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.

2.2.8 Reopening for Cause

WAC 173-401-730(11/4/93)

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

(i) Additional requirements become applicable to the source with a remaining permit term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j);

(ii) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the EPA Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit;

(iii) The NWCAA or the EPA 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

(iv) The NWCAA or the EPA Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

2.2.9 Changes not Requiring Permit Revisions/Off-Permit Changes

WAC 173-401-722 (10/17/02) and WAC 173-401-724 (11/4/93)

The permittee may make the changes described in WAC 173-401-722 and WAC 173-401-724 without revising this permit, provided that the changes satisfy the criteria set forth in those sections.

2.2.10 Permit Modifications

WAC 173-401-720 (11/4/93) and WAC 173-401-725 (11/4/93)

This permit may be revised as provided in WAC 173-401-720 (administrative permit amendments) and 173-401-725 (permit modifications).

2.2.11 Property Rights

WAC 173-401-620(2)(d) (11/4/93)

This permit does not convey any property rights of any sort, or any exclusive privilege.

2.2.12 Definitions

2.2.12.1 NWCAA 200 (10/13/94)

Particular references to terms not otherwise defined in this permit or the associated Statement of Basis have the meaning assigned to them in the specific regulation being cited. The terms NWCAA, Ecology, and EPA shall mean the Northwest Clean Air Agency, the Washington State Department of Ecology, and the United States Environmental Protection Agency, respectively.
FCAA means the Federal Clean Air Act.

2.2.12.2  
State Only: NWCAA 200 (11/8/07)

In the new version of the NWCAA Regulation some of the definitions have been modified slightly to provide clarification and some have been revised to include an expanded definition of the term.

2.2.13 Compliance Schedule

WAC 173-401-630(3) (11/4/93) and WAC 173-401-510(2)(h)(iii) (6/17/94)

The permittee shall continue to comply with all applicable requirements with which the source was in compliance as of the date of permit issuance. The permittee shall meet on a timely basis any applicable requirements that become effective during the permit term.

2.2.14 Permit Fees

2.2.14.1  
WAC 173-401-620(2)(f) (11/4/93)

The permittee shall pay fees as a condition of this permit in accordance with the NWCAA fee schedule.

2.2.14.2  
State Only: NWCAA 322.4 (11/12/99)

The NWCAA shall assess and collect annual air operating permit fees for sources in its jurisdiction that are required to have Title V Air Operating Permits (excluding sources regulated by WDOE directly). The total fees required to administer the program shall be determined by a workload analysis conducted by NWCAA staff and approved annually by the NWCAA Board of Directors.

2.2.15 Transfer or Permanent Shutdown

2.2.15.1  
NWCAA 325 (2/14/73)

Approval to construct a stationary source is not to be transferable from one location to another (outside the plant boundary), from one piece of equipment to another, or from one person to another, except portable sources may retain the same registration so long as they remain within the jurisdiction of the NWCAA.

2.2.15.2  
State Only: NWCAA 325 (11/8/07)

Approval to construct a stationary source is not to be transferable from one location to another (outside the plant boundary), from one piece of equipment to another, or from one person to another, except portable sources may retain the same registration so long as they remain within the jurisdiction of the NWCAA and they comply with NWCAA 300 and 301.

The registered owner or operator shall report the transfer of ownership or permanent shutdown of a registered source to the NWCAA within ninety (90) days of shutdown or transfer. The new owner of a registered source shall file a written report with the NWCAA within ninety (90) days of completing transfer of ownership and/or assuming operational control.

In the case of a permanent shutdown, process and pollution control equipment may remain in place and on site, but shall be rendered incapable of generating emissions to the atmosphere.
2.3 Permit Shield

2.3.1 Shield Requirement

_WAC 173-401-640(1) (11/4/93)_

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

2.3.2 Inapplicable Requirements

_WAC 173-401-640(2) (11/4/93)_

As of the date of permit issuance, the requirements listed in the Inapplicable Requirements section of this permit do not apply to the permittee. The permit shield applies to all requirements so identified.

2.3.3 Exclusions

_WAC 173-401-640(4) (11/4/93)_

Nothing in this section or in this permit shall alter or affect the following:

(i) Provisions of Section 303 of the FCAA (emergency orders), including the authority of the EPA Administrator under that section;

(ii) Liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

(iii) Ability of EPA to obtain information from a source pursuant to Section 114 of the FCAA; or

(iv) Ability of the permitting authority to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in RCW 70.94.154.

2.3.4 Reasonably Available Control Technology

2.3.4.1 _WAC 173-401-605(3) (11/4/93)_

Emission standards and other requirements contained in rules or regulatory orders in effect at the time of operating permit issuance shall be considered RACT for purposes of permit issuance or renewal.

2.3.4.2 _WAC 173-400-040 (9/20/93)_

All emissions units are required to use RACT which may be determined for some sources or source categories to be more stringent than the applicable emission limitations of any chapter of Title 173 WAC. Where current controls are determined to be less than RACT, Ecology or the NWCAA shall, as provided in Section 8, Chapter 252, Laws of 1993, define RACT for each source or source category and issue a rule or regulatory order requiring the installation of RACT.

2.3.4.3 State Only: _WAC 173-400-040 (2/10/05)_

All emissions units are required to use RACT which may be determined for some sources or source categories to be more stringent than the applicable emission limitations of any chapter of Title 173 WAC. Where current controls are determined to be less than RACT, Ecology or the
NWCAA shall, as provided in RCW 70.94.154, define RACT for each source or source category and issue a rule or regulatory order requiring the installation of RACT.

2.3.5 Emergencies

WAC 173-401-645 (11/4/93)

An emergency, as defined in WAC 173-401-645(1), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if conditions of WAC 173-401-645 (3) and (4) are met. This provision is in addition to the affirmative defense for unavoidable excess emissions found in any applicable requirement.

The permittee shall submit a notice of emergency to the NWCAA within two working days of the time when the emission limitation was exceeded due to an emergency or shorter periods of time specified in an applicable requirement.

2.4 Recordkeeping and Reporting

2.4.1 Compliance Certification

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

The permittee shall submit ongoing certifications of compliance with permit terms and conditions. The first such certification shall cover the period from the last compliance certification until issuance of this permit. The following compliance certification shall cover the period from permit issuance to the end of the calendar year. Subsequent compliance certifications shall be made on a yearly basis. Each certification shall include:

(i) Identification of each term and condition of the permit that is the basis of the certification;

(ii) Compliance status;

(iii) Whether the compliance was continuous or intermittent;

(iv) Methods used for determining the compliance status of the source, currently and over the reporting period. These methods must be consistent with the permit Monitoring, Recordkeeping, and Reporting requirements.

All compliance certifications shall be submitted to EPA Region 10 and the Northwest Clean Air Agency at the following addresses by February 28 for the previous calendar year:

<table>
<thead>
<tr>
<th>U.S. EPA, Region 10</th>
<th>Northwest Clean Air Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Suite 900, AWT-107</td>
<td>Attn: Air Operating Permits</td>
</tr>
<tr>
<td>Attn: Air Operating Permits</td>
<td>1600 South Second Street</td>
</tr>
<tr>
<td>1200 Sixth Avenue</td>
<td>Mount Vernon, WA 98273-5202</td>
</tr>
<tr>
<td>Seattle, WA 98101</td>
<td></td>
</tr>
</tbody>
</table>

WAC 173-401-520 (11/4/93)

Any application form, report or compliance certification that is submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
2.4.1.3 WAC 173-401-615 (10/17/02) and 630 (11/4/93)
Directly enforceable under WAC 173-401-615(1)(b) & (c) (10/17/02)

All required monitoring 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 to be submitted once every six months, covering all required reporting since the date of the last certification, provided that the certification specifically identifies all documents subject to the certification.

All semiannual monitoring certifications are due as follows:

- January 31 for reports from July through December
- July 31 for reports from January through June

2.4.1.4 WAC 173-401-530(2)(d) (10/17/02)

Where a permit does not require testing, monitoring, recordkeeping and reporting for insignificant emissions units or activities, the permittee may certify continuous compliance if there were no observed, documented, or known instances of noncompliance of an insignificant emission unit during the reporting period. Where an underlying OAC requires testing, monitoring, recordkeeping and reporting for insignificant emission units or activities, the permittee may certify continuous compliance when the testing, monitoring and recordkeeping required by the permit revealed no violations during the period, and there were no observed, documented or known instances of noncompliance during the reporting period.

2.4.2 False and Misleading Oral Statement: Unlawful Reproduction or Alteration of Documents

2.4.2.1 NWCAA 112 (2/14/73)

No person shall willfully make a false or misleading oral statement to the Board as to any matter within the jurisdiction of the Board.

No person shall reproduce or alter or cause to be reproduced or altered any order or other paper issued by the Agency if the purpose of such reproduction or alteration is to evade or violate any provision or Regulation of this Agency, or any other law.

2.4.2.2 State Only: NWCAA 112 (11/12/99)

No person shall willfully make a false or misleading oral statement to the NWCAA Board, Control Officer, or their duly authorized representatives as to any matter within the jurisdiction of the Board.

No person shall reproduce or alter or cause to be reproduced or altered any order or other paper issued by the NWCAA if the purpose of such reproduction or alteration is to evade or violate any provision or Regulation of the NWCAA, or any other law.

2.4.3 Required Recordkeeping

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

Records of required monitoring information shall include, where applicable, the following:

(i) Date, time, and location of sampling or measurements;
(ii) Operating conditions existing at the time of sampling or measurement; and
(iii) If analyses were performed, the date, company or entity performing the analyses, the analytical techniques or methods used, and the results of such analyses.
A record shall be kept describing changes made that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

Records of all required monitoring data and support information shall be retained for a period of five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

2.4.3.2 WAC 173-401-615 (10/17/02) and 630 (11/4/93)  
Directly enforceable under WAC 173-401-615(1)(b) & (c) (10/17/02)

Monitoring and associated recordkeeping is not required when an emission unit is not operating and there are no emissions to the atmosphere unless such monitoring is specifically required by the NWCAA. The facility must record the time periods that the unit is shut down and not monitored, and include the time periods and a summary of why the emission unit was shut down in the periodic report of monitoring required by WAC 173-401-615(3)(a).

2.4.4 Pollutant Disclosure - Reporting by Air Contaminant Sources

2.4.4.1 NWCAA 150 (9/8/93) and WAC 173-400-105(1) (9/20/93)

The permittee shall file annually at a time determined by the NWCAA and on forms furnished by the NWCAA a report setting forth:

(i) The nature of the enterprise;

(ii) A list of process materials which are potentially significant sources of emissions used in, and incidental to, its manufacturing processes, including any by-products and waste products;

(iii) An estimated annual total production of wastes discharged into the air in units and contaminants designated by the NWCAA.

Annual emission reports shall be submitted to the NWCAA within 105 days after the end of the previous calendar year. If the emission report is not submitted by the required date and the emissions are used to determine operating permit fees as described in NWCAA 324.126 then potential to emit will be used to determine said fees.

The permittee shall maintain records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards.

2.4.4.2 State Only: WAC 173-400-105(1)(6/8/07)

In addition to the requirements of 2.4.4.1, the permittee shall report oxides of nitrogen, \( \text{PM}_{2.5} \), and ammonia on forms available from the NWCAA or Ecology. Emission estimates may be based on the most recent published EPA emission factors or other information available to the source, whichever is the better estimate.

2.4.4.3 State Only: NWCAA 150 (11/8/07)

Annual emission reports shall be submitted to the NWCAA no later than April 15 of the following calendar year. If the emission report is not submitted by the required date and the emissions are used to determine operating permit fees as described in NWCAA Regulation 322.4, then potential to emit may be used to determine said fees.
2.4.5 Reporting to Verify Emissions from Potential PSD Sources

*State Only: WAC 173-400-720(4)(b)(iii) (6/8/07)*

The owner or operator shall monitor the emissions of any regulated pollutants from all projects for which PSD applicability was determined according to the provisions of 40 CFR 52.21(b)(41)(ii)(a) through (c), and calculate and maintain a record of annual emissions on a calendar year basis.

The owner or operator shall submit a report to NWCAA within 60 days after the end of the year in which the emissions occurred. The report shall include the emissions in tons per year for the project, the baseline actual emissions and the pre-construction projected emissions.

2.4.6 Reporting of Deviations from Permit Conditions

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

Directly enforceable under WAC 173-401-615(1)(b) & (c) (10/17/02)

Prompt Reporting of Deviations: The permittee shall promptly report all deviations from permit requirements, including those attributable to upset conditions as defined in this permit. The report shall include a description of the probable cause of such deviations, if known, and any corrective actions or preventive measures taken. Prompt means reporting according to the shortest time period listed below which applies to the situation:

(i) In the case where the deviation represents a potential threat to human health or safety “prompt” means as soon as possible, but in no case later than twelve hours after the deviation is discovered. A follow up report on the deviation shall be included in the next monthly report.

(ii) For all other deviations, the deviation shall be reported as part of the next routine monitoring report, but no later than 30 days after the end of the month during which the deviation is discovered, whichever is sooner.

2.4.7 Report of Breakdown and Upset

2.4.7.1 *NWCA 340.1, 340.2 and 340.3 (10/13/94)*

If a breakdown or upset condition occurs which results in or may have resulted in an emission and/or ambient air quality standard being exceeded, the owner or operator of the source shall take the following actions:

(i) The upset or breakdown shall be reported as promptly as possible and in no event later than twelve (12) hours to the NWCAA.

(ii) The person responsible shall, upon the request of the Control Officer, submit a full report within ten (10) days including the known causes, corrective measures taken, and preventive measures to be taken to minimize or eliminate a recurrence.

Compliance with the requirements of this section does not relieve the owner or operator of the source from the responsibility to maintain continuous compliance with all the requirements of the NWCAA Regulation nor from the resulting liabilities for failure to comply.

It shall be prima facie evidence of violation of the NWCAA Regulation if any control equipment or other equipment creating emissions to the atmosphere is turned off, broken down or otherwise inoperative, and a notice of breakdown has not been filed under NWCA 340.1.

2.4.7.2 *State Only: NWCA 340.1, 340.2 and 340.3 (11/8/07)*

If a breakdown or upset condition occurs which results in or may have resulted in an
exceedance of an emission and/or ambient air quality standard, the owner or operator of the source shall take the following actions:

(i) The upset or breakdown shall be reported as promptly as possible and in no event later than twelve (12) hours to the NWCAA.

(ii) The responsible official or his designee shall submit a full report on forms provided by the NWCAA within 30 days after the end of a calendar month in which the upset occurred and must include as a minimum the known causes, corrective action taken, preventive measures put in place to reduce the possibility of or eliminate a recurrence, and an estimate of the quantity of emissions above the applicable limit caused by the event.

In addition to the reporting requirements of the 10/13/94 version of NWCAA 340, the permittee must also report to the NWCAA if the emission release to the air requires agency notification as specified in 40 CFR 302 (CERCLA) or 40 CFR 355 (SARA).

It shall be prima facie evidence of violation of the NWCAA Regulation if any other equipment creates new or increased emissions to the atmosphere as the result of being turned off, broken down or otherwise inoperative, and a notice of breakdown has not been filed under NWCAA 340.1.

2.4.8 Report of Shutdown or Startup

2.4.8.1 NWCAA 341 (9/8/93)

If the permittee schedules a total or partial shutdown or startup of control or process equipment which may result in emissions or any additional emissions to the atmosphere which may temporarily exceed the emission standards of this Regulation, the permittee shall notify the NWCAA prior to the shutdown or startup.

Prompt notification shall be made and in no event less than 24 hours before the scheduled shutdown or startup. The permittee shall submit a general schedule of steps to be taken to minimize the release of air contaminants to the atmosphere including the reasons for and duration of the proposed shutdown or startup, the nature of the action to be taken, the date and time for the action and an estimate of the anticipated rate and concentration of emission.

Compliance with the requirements of this section does not relieve the owner or operator of the source from the responsibility to maintain continuous compliance with the requirements of this Regulation nor from the resulting liabilities for failure to comply.

2.4.8.2 State Only: NWCAA 341 (7/14/05)

If the permittee schedules a total or partial shutdown or startup of control or process equipment that the source reasonably believes would result in emissions which may temporarily exceed an emission standard of this Regulation, the operator or owner of the source shall notify the NWCAA in advance of the shutdown or startup.

The advanced notification shall include a general schedule of steps to be taken to minimize the release of air contaminants to the atmosphere including the reasons for and duration of the proposed shutdown or startup, the nature of the action to be taken, the date and time for the action and an estimate of the anticipated rate and concentration of emission.

Compliance with the requirements of this section does not relieve the owner or operator of the source from the responsibility to maintain continuous compliance with the requirements of this Regulation nor from the resulting liabilities for failure to comply.
Excess emissions due to shutdown or startup shall be considered unavoidable, and not subject to penalty, provided the stationary source adequately demonstrates that the excess emissions could not have been prevented through careful planning and design, the emissions did not result in a violation of an ambient air quality standard and if a bypass of control equipment occurs, that such bypass is necessary to prevent loss of life, personal injury, or severe property damage.

The responsible official or their designee shall submit a full report no later than 30 days after the end of the calendar month in which the shutdown or startup occurred that resulted in an exceedance of an ambient or emission standard of this Regulation. The report shall be submitted on forms provided by the NWCAA and must include, at minimum, the known causes, corrective action taken, preventive measures put in place to reduce the possibility of or eliminate a recurrence, and an estimate of the quantity of emissions above the applicable limit caused by the event.

2.4.9 Operation and Maintenance

2.4.9.1 NWCAA 342 (9/8/93)

Keep all process and/or air pollution control equipment in good operating condition and repair. If a breakdown or upset condition occurs and is determined by the Control Officer to be due to poor operating and maintenance procedures, the Control Officer may take any legal steps necessary to prevent a recurrence of the breakdown or upset condition.

Operation and maintenance instructions and schedules for process and/or control equipment must be available and may be required to be posted on the site. This section is specifically applicable to the operation of equipment where untrained personnel may operate or otherwise have access to or use the equipment.

If a breakdown or violation occurs and is due to the improper operation or maintenance of equipment, the owner or operator of the source will, in addition to filing a report of breakdown under NWCAA 340, submit a report if requested by the Control Officer on what measures will be taken in training or re-orienting personnel to prevent a recurrence of the breakdown.

2.4.9.2 State Only: NWCAA 342 (7/14/05)

All air contaminant stationary sources are required to keep any process and/or air pollution control equipment in good operating condition and repair.

Operating instructions and maintenance schedules for process and/or control equipment must be available on site.

2.5 Excess Emissions

2.5.1 Excess Emission

WAC 173-400-107 (9/20/93)

The permittee shall have the burden of proving to Ecology or the NWCAA or the decision-making authority in an enforcement action that excess emissions were unavoidable. Excess emissions determined to be unavoidable under the procedures and criteria of this section shall be excused and not subject to penalty.

Excess emissions which represent a potential threat to human health or safety or which the owner or operator of the source believes to be unavoidable shall be reported to the NWCAA as soon as possible. Other excess emissions shall be reported within thirty days after the end of the month during which the event occurred or as part of the routine emission monitoring reports.
Upon request by Ecology or the NWCAA, the permittee shall submit a full written report including the known causes, the corrective actions taken, and the preventive measures to be taken to minimize or eliminate the chance of recurrence.

Excess emissions due to startup or shutdown conditions shall be considered unavoidable provided the source reports as required and adequately demonstrates that the excess emissions could not have been prevented through careful planning and design and if a bypass of control equipment occurs, that such bypass is necessary to prevent loss of life, personal injury, or severe property damage.

Excess emissions due to scheduled maintenance shall be considered unavoidable provided the source reports as required and adequately demonstrates that the excess emissions could not have been prevented through reasonable design, better scheduling for maintenance or through better operation and maintenance practices.

Excess emissions due to upsets shall be considered unavoidable provided the source reports as required and adequately demonstrates that:

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

2.5.2 Excess Emissions Due to Breakdowns, Upsets, Startup, or Shutdown

*State Only: NWCAA 340.4 (11/8/07) and 341.4 (7/14/05)*

Excess emissions due to breakdowns and upsets shall be considered unavoidable, and not subject to penalty, provided the stationary source adequately demonstrates that:

(i) The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition;
(ii) The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance;
(iii) The operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice; and
(iv) The emissions did not result in a violation of an ambient air quality standard.

Excess emissions due to shutdown or startup shall be considered unavoidable, and not subject to penalty, provided the stationary source adequately demonstrates that the excess emissions could not have been prevented through careful planning and design, the emissions did not result in a violation of an ambient air quality standard and if a bypass of control equipment occurs, that such bypass is necessary to prevent loss of life, personal injury, or severe property damage.
2.6 **Duty to Supplement or Correct Information**

*State Only: WAC 173-401-500(6) (10/17/02)*

Upon becoming aware that the source failed to submit any relevant facts in a permit application or that information submitted in a permit application is incorrect, the source shall promptly submit such supplementary facts or corrected information.

2.7 **Prohibitions**

2.7.1 **Concealment and Masking**

2.7.1.1 *WAC 173-400-040(7) (9/20/93) and (2/10/05 State Only)*

No person shall cause or permit the installation or use of any means which conceals or masks an emission of an air contaminant which would otherwise violate the provisions of this chapter.

2.7.1.2 *State Only: NWCAA 540 (1/8/69)*

It shall be unlawful for any person to willfully cause or permit the installation or use of any device or use of any means which, without resulting in a reduction in the total amount of air contaminant emitted, conceals an emission of air contaminant which would otherwise violate the emission standards of this Regulation.

It shall be unlawful for any person to cause or permit the installation or use of any device or use of any means designed to mask the emission of an air contaminant, which causes detriment to health, safety, or welfare of any person.

2.7.2 **Adjustment for Atmospheric Conditions**

*WAC 173-400-205 (3/22/91)*

The permittee shall not vary the rate of emission of a pollutant according to atmospheric conditions or ambient concentrations of that pollutant except as directed according to air pollution episode regulations.

2.7.3 **Outdoor Burning**

2.7.3.1 *WAC 173-425-036 (10/18/90) and WAC 173-425-045 (1/3/89), WAC 173-435-050(2) (01/3/89) Although SIP-Approved, WAC 173-425-036, -045, and -055 (referenced below) have been repealed.*

No person shall conduct outdoor burning during an air pollution episode or a declared period of impaired air quality. Except as provided in WAC 173-425-055, the following materials shall not be burned in any open fire: (1) garbage, (2) dead animals, (3) asphaltic products, (4) waste petroleum products, (5) paints, (6) rubber products, (7) plastics, (8) treated wood, and (9) any substance, other than natural vegetation, which normally emits dense smoke or obnoxious odors.

2.7.3.2 *State Only: WAC 173-425-040, 050, and 060 (4/13/00), NWCAA 502 (11/8/07)*

No person shall conduct outdoor burning except in accordance with the applicable regulations listed above. Outdoor burning shall be conducted under a valid fire permit and shall not contain prohibited materials, unless specifically exempted. Emissions from burning shall not create a nuisance and/or interfere with visibility on any public road.
2.7.4 Asbestos

2.7.4.1 State Only: NWCAA 570 (11/8/07)

The permittee shall conduct all renovation or demolition projects in accordance with the applicable asbestos control standards listed in NWCAA 570.

2.7.4.2 40 CFR 61.145 (1/16/91), 61.148 (11/20/90) and 61.150 (9/18/03)

The permittee shall comply with 40 CFR Sections 61.145, 61.148 and 61.150 when conducting any renovation or demolition at the facility.

2.7.5 Stratospheric Ozone and Climate Protection

2.7.5.1 40 CFR 82 Subpart F (4/30/09)

The permittee shall comply with the standards for recycling and emissions reduction in accordance with the requirements listed in 40 CFR 82 Subpart F.

2.7.5.2 State Only: RCW 70.94.970 (1991 c 199 §602)

A person who services, repairs or disposes of a motor vehicle air conditioning system; commercial or industrial air conditioning, heating, or refrigeration system; or consumer appliance shall use refrigerant extraction equipment to recover regulated refrigerant that would otherwise be released into the atmosphere. This subsection does not apply to off-road commercial equipment.

The willful release of regulated refrigerant from a source listed in this section is prohibited.

2.7.6 Display of Orders, Certificates and Other Notices: Removal or Mutilation Prohibited

NWCAA 124 (2/14/73)

Any order or other certificate obtained from the NWCAA shall be available at the facility. If the NWCAA requires a notice to be displayed, it shall be posted. No one shall mutilate, obstruct or remove any notice unless authorized to do so by the NWCAA.

2.7.7 Obstruction of Access

State Only: RCW 70.94.200, (1987 c 109 §38)

The permittee shall not obstruct, hamper or interfere with any authorized representative of the NWCAA who requests entry for the purposes of inspection and who presents appropriate credential; nor shall any person obstruct, hamper, or interfere with any such inspection.

2.7.8 False Statement, Representation or Certification

State Only: WAC 173-400-105(7) (6/8/07)

No person shall make any false material statement, representation or certification in any form, notice or report required under Chapter 70.94 or 70.120 RCW, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto.

2.7.9 Inaccurate Monitoring

State Only: WAC 173-400-105(8) (6/8/07)

No person shall render inaccurate any monitoring device or method required under Chapter 70.94 or 70.120 RCW, or any ordinance, resolution, regulation, permit, or order in force
pursuant thereto.

2.7.10 Prevention of Accidental Release

40 CFR 68 (4/9/04)

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the accidental release prevention regulations in Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in section 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70.

2.7.11 Cutback Asphalt Paving

NWCAA 580.7 (4/14/93)

The application of cutback asphalt in paving during the months of June, July, August and September is limited to use as prime coatings and patch mixes, or when the temperature is less than 50°F.

2.7.12 Creditable Stack Height and Dispersion Techniques

WAC 173-400-200 (3/22/91) (State Only - 2/10/05)

For stacks for which construction or reconstruction commenced, or for which major modifications were carried out, after December 31, 1970, no source may use dispersion techniques or excess stack height to meet ambient air quality standards or PSD increment limitations.

2.8 Notice of Construction and Application for Approval/New Source Review

2.8.1 Minor New Source Review (NSR)

2.8.1.1 WAC 173-400-110 (9/20/93), NWCAA 300, 301, 302 & 324.2 (10/13/94), and NWCAA 303 (8/9/78)

No person shall construct, install, establish, modify or alter an air contaminant source or an emission unit without filing a “Notice of Construction and Application for Approval” and receiving approval from the NWCAA in accordance with the cited regulations.

2.8.1.2 State Only: WAC 173-400-110 (6/20/09), WAC 173-460-010 through -150 (6/20/09), NWCAA 300.1-300.12, NWCAA 301 (11/8/07), 303 (11/12/98), and 324.2 (11/8/07)

A Notice of Construction application must be filed by the owner or operator and an Order of Approval issued by the NWCAA prior to the establishment of any new source in accordance with the cited regulations. For purposes of this section “establishment” shall mean to “begin actual construction” as that phrase is defined in NWCAA 200, and “new source” shall include any “modification” to an existing “stationary source” as those terms are defined in NWCAA 200.

2.8.2 General Order

State Only: WAC 173-400-560 (2/10/05) and NWCAA 300.14 (11/8/07)

An owner or operator may apply for an applicable general order for approval to construct certain specified sources as defined in WAC 173-400-560. A general order of approval shall identify criteria by which an emission unit or source may qualify for coverage under a general order of approval and shall include terms and conditions for installing and/or operating the source.
2.8.3 Requirements to Comply

*State Only: NWCAA 300.15 (11/8/07)*

It shall be unlawful for an owner or operator of a source or emission unit to not abide by the operating and reporting conditions in the Order of Approval.

2.8.4 Prevention of Significant Deterioration (PSD)

*State Only: WAC 173-400-710, 720 (6/8/07), WAC 173-400-700, 730, 740 and 750 (2/10/05)*

A Prevention of Significant Deterioration (PSD) permit application must be filed by the owner or operator and a PSD permit issued by Ecology prior to the establishment of any new source in accordance with the cited regulations. No major stationary source or major modification as defined in the cited regulation shall begin actual construction without having received a PSD permit. Allowable emissions from the proposed major stationary source or major modification shall not cause or contribute to a violation of any ambient air quality standard.

An applicant for a PSD permit must submit an application that provides complete information for Department of Ecology to determine compliance with all PSD program requirements. Detailed procedures for submitting a complete application, for public review and involvement, and for revisions to an existing PSD permit are provided in the cited regulations (WAC 173-400-700 through 750).

2.8.5 Replacement or Substantial Alteration of Control Technology at an Existing Source

*State Only: WAC 173-400-114 (9/15/01), NWCAA 300.13 (11/8/07)*

Any person proposing to replace or substantially alter emission control technology installed on an existing stationary source or emission unit shall file a Notice of Construction application with the NWCAA.
SECTION 3     STANDARD TERMS AND CONDITIONS FOR NSPS AND NESHAP

Standard terms and conditions are administrative and/or other requirements that typically have no ongoing compliance monitoring requirements. The permittee must comply with the requirements listed below for specific “affected facilities” as defined in the New Source Performance Standards (NSPS) in 40 CFR 60.2 and “affected sources” defined in the National Emission Standards for Hazardous Air Pollutants (NESHAP) in 40 CFR Part 63.2. The affected facilities and affected sources subject to these requirements are identified in Section 5 of the permit. The conditions in this section do not apply generally to all emission units at the facility.

3.1    40 CFR Part 60 – New Source Performance Standard Requirements

3.1.1 Address for Reports, Notifications and Submittals

40 CFR 60.4(a) and (b) (4/25/75) (as amended by Delegation Letter of 8/29/06 from Betty Wiese, EPA Region X to James Randles, Director of NWCAA)

Notifications, reports, and applications for delegated New Source Performance Standards (NSPS) shall be sent to the NWCAA at the following address:

Northwest Clean Air Agency
1600 S. Second Street
Mount Vernon, WA 98273-5202

Authority to approve major changes in emission units, test methods and monitoring methods prescribed by 40 CFR Part 60 has not been delegated to NWCAA. Prior to filing an application under any NSPS regulation that authorizes EPA to approve alternate emission limits, test methods, or monitoring methods, the permittee shall consult with NWCAA to determine whether the application falls within the scope of NWCAA's delegated authority.

Applications under NSPS authorities that have been excluded from delegation shall be submitted to the NWCAA at the above address and to the EPA at the following address:

Director
Office of Air, Waste, and Toxics
U.S. EPA Region 10
1200 Sixth Avenue
Seattle WA 98101

3.1.2 Compliance with Opacity Standards

40 CFR 60.11(b) and (c) (10/17/00)

Compliance with opacity standards in 40 CFR Part 60 shall be determined by EPA Method 9 in appendix A. For purposes of determining initial compliance, the minimum total time of observations shall be 3 hours (30 6-minute averages) for the performance test or as provided in paragraph (e)(5). The opacity standards set forth in this part shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard.
3.1.3 Operation and Maintenance

40 CFR 60.11(d) (10/17/00)

At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.

3.1.4 Credible Evidence

40 CFR 60.11(g) (10/17/00)

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in this part, nothing in this part shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

3.1.5 Circumvention

40 CFR 60.12 (3/8/74)

No owner or operator subject to the provisions of this part shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere.

3.1.6 Notification

40 CFR 60.7(a) (2/12/99) (as amended by Delegation Letter of 8/29/06 from Betty Weise, EPA Region X to James Randles, Director of NWCAA

Furnish written notification to NWCAA of the following:

(i) The date construction (or reconstruction as defined by 40 CFR 60.15) of an affected facility commenced postmarked no later than 30 days after such date.

(ii) Notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.

(iii) Notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change.

(iv) Notification of the date upon which demonstration of the continuous monitoring system performance commences in accordance with 40 CFR 60.13(c). Notification shall be postmarked not less than 30 days prior to such date.

(v) Notification of the anticipated date for conducting the opacity observations required by 40 CFR 60.11(e)(1) of this part. The notification shall be postmarked not less than 30 days prior to such date.
(vi) Notification that continuous opacity monitoring system data results will be used to
determine compliance with the applicable opacity standard during a performance test
required by 60.8 in lieu of Method 9 observation data as allowed by 40 CFR 60.11(e)(5)
of this part. This notification shall be postmarked not less than 30 days prior to the date
of the performance test.

3.1.7 Startup, Shutdown, and Malfunction Records

40 CFR 60.7(b) (2/12/99)

Maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the
operation of an affected facility; any malfunction of the air pollution control equipment; or any
periods during which a continuous monitoring system or monitoring device is inoperative.

3.1.8 Excess Emission Records

40 CFR 60.7(c) and (d) (2/12/99) (as amended by Delegation Letter of 8/29/06 from Betty Wiese,
EPA Region X to James Randles, Director of NWCAA)

Each owner or operator required to install a continuous monitoring device shall submit excess
emissions (as defined in applicable subparts) and monitoring systems performance and/or
summary report form to the NWCAA semiannually, except when: more frequent reporting is
specifically required in any subpart; or the NWCAA determines that more frequent reporting is
necessary. Written reports of excess emissions shall include the information in 60.7(c)(1)
through (4). All semiannual monitoring certifications are due as follows:

January 31 for reports from July through December
July 31 for reports from January through June

3.1.9 Maintenance of Records

40 CFR 60.7(f) (2/12/99)

Maintain a file of all measurements, including continuous monitoring system, monitoring device,
and performance testing measurements; all continuous monitoring system performance
evaluations; all continuous monitoring system or monitoring device calibration checks;
adjustments and maintenance performed on these systems or devices; and all other information
required by this part recorded in a permanent form be retained for at least two years following
the date of such measurements, maintenance, reports, and records, except as described in
60.7(f)(1) through (3).

Note: Under WAC 173-401-615(2), records of required monitoring data and support information
will be retained for a period of five years from the date of the monitoring sample, measurement,
report, or application.

Requirements

3.2.1 Address for Reports, Notifications and Submittals

40 CFR 63.9(a)(5/30/03) and 63.10(a) (4/20/06) (as amended by Delegation Letter of 8/31/06
from Richard Albright, Director, EPA Office of Air, Waste, and Toxics to James Randles, Director
of NWCAA).

Notifications, reports, and applications for delegated Part 63 National Emission Standards for
Hazardous Air Pollutants (NESHAP) shall be sent to the NWCAA at the following address:
All NESHAP Subparts referenced in this permit have been delegated to NWCAA. Authority to approve major changes in emission units, test methods and monitoring methods prescribed by 40 CFR Part 63 have not been delegated to NWCAA (see 68 Federal register 37334 published June 23, 2003). Prior to filing an application under any NESHAP regulation that authorizes EPA to approve alternate emission limits, test methods, or monitoring methods, the permittee shall consult with NWCAA to determine whether the application falls within the scope of NWCAA’s delegated authority.

Applications under NESHAP authorities that have been excluded from delegation shall be submitted to the NWCAA at the above address and to the EPA at the following address:

Director, Office of Air, Waste, and Toxics
U.S. EPA Region 10
1200 Sixth Avenue
Seattle WA 98101

3.2.2 Requirements for Existing, Newly Constructed, and Reconstructed Part 63 NESHAP Sources

A new affected source for which construction commences after proposal of a relevant standard is subject to relevant standards for new affected sources, including compliance dates. An affected source for which reconstruction commences after proposal of a relevant standard is subject to relevant standards for new sources, including compliance dates, irrespective of any change in emissions of hazardous air pollutants from that source.

After the effective date of any relevant standard promulgated by the EPA under Part 63, no person may, without obtaining written approval in advance from the NWCAA in accordance with the procedures in paragraphs (d) and (e) of this Part 63.5, do any of the following:

i. Construct a new affected source that is major-emitting and subject to such standard;

ii. Reconstruct an affected source that is major-emitting and subject to such standard; or

iii. Reconstruct a major source such that the source becomes an affected source that is major-emitting and subject to the standard.

After the effective date of any relevant standard promulgated by the EPA under this part, an owner or operator who constructs a new affected source that is not major-emitting or reconstructs an affected source that is not major-emitting that is subject to such standard, or reconstructs a source such that the source becomes an affected source subject to the standard, must notify the Administrator of the intended construction or reconstruction. The notification must be submitted in accordance with the procedures in 63.9(b)(4) and (5).

After the effective date of any relevant standard promulgated by the Administrator under this part, equipment added (or a process change) to an affected source that is within the scope of the definition of affected source under the relevant standard must be considered part of the affected source and subject to all provisions of the relevant standard established for that affected source.
3.2.3 Notification Requirements for New or Reconstructed Part 63 NESHAPS Sources

40 CFR Part 63.9(b)(4) (5/30/03)

The owner or operator of a new or reconstructed major affected source for which an application for approval of construction or reconstruction is required under 63.5(d) must provide the following information in writing to the NWCAA:

A notification of intention to construct a new major-emitting affected source, reconstruct a major-emitting affected source, or reconstruct a major source such that the source becomes a major-emitting affected source with the application for approval of construction or reconstruction as specified in 63.5(d)(1)(i); and

A notification of the actual date of startup of the source delivered or postmarked within 15 calendar days after that date.

3.2.4 Notification Requirements for Existing Part 63 NESHAPS Sources

40 CFR Part 63.9(b)(2) and (j) (5/30/03)

The owner or operator of an affected source that has an initial startup before the effective date of a relevant standard under this part shall notify the NWCAA in writing that the source is subject to the relevant standard. The notification, which shall be submitted not later than 120 calendar days after the effective date of the relevant standard (or within 120 calendar days becomes subject to the relevant standard) shall provide the following information:

i. The name and address of the owner or operator;

ii. The address (i.e., physical location) of the affected source;

iii. An identification of the relevant standard, or other requirement that is the basis of notification and the source’s compliance date;

iv. A brief description of the nature and size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and the types of hazardous air pollutants emitted; and

v. A statement of whether the affected source is a major source or an area source.

Any change in the information provided under this section shall be provided to the Administrator in writing within 15 calendar days after the change.
SECTION 4 GENERALLY APPLICABLE REQUIREMENTS

The cited requirements in the “Citation” column and incorporated herein by reference are applicable plantwide at the source, including insignificant emission units. These requirements are federally enforceable unless identified as “state only”. A requirement designated “state only” is enforceable only by the state or the NWCAA, and not by the EPA or through citizen suits. The “Description” column is a brief description of the applicable requirements for informational purposes only and is not enforceable. Periodic or continuous monitoring requirements (including testing) are specified in the “Monitoring, Recordkeeping and Reporting” column, which identifies monitoring, recordkeeping and reporting (MR&R) obligations the source must perform as required by WAC 173-401-605(1) and 615(1) and (2) or the underlying requirement. MR&R obligations do not apply to insignificant emission units. The test method cited or any credible evidence may be used to determine compliance.

The requirements in the MR&R column labeled “Directly enforceable” are legally enforceable requirements added under the NWCAA’s “gap-filling” authority of WAC 173-401-615(1)(b) & (c), 10/17/02.

Table 4-1 Generally Applicable Requirements

<table>
<thead>
<tr>
<th>Permit Term</th>
<th>Citation</th>
<th>Description</th>
<th>Monitoring/Recordkeeping/Reporting</th>
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<tbody>
<tr>
<td>4.1</td>
<td>NWCAA 451.1 (10/13/94)</td>
<td>Visible Emissions</td>
<td>Directly enforceable</td>
</tr>
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<td></td>
<td>NWCAA 451.1 (11/8/07 State only)</td>
<td>Opacity shall remain below 20% for any period aggregating more than 3 minutes in any sixty-minute period.</td>
<td>Conduct a facility-wide inspection at least once per calendar month during each month of operation for visible emissions, odors, prohibited activities under 2.7 and activities that require additional approval under Section 2.8. The inspections shall also examine the general state of compliance with the Operation and Maintenance (O&amp;M) Plan. If, during the monthly inspection or at any time, visible emissions are observed by plant personnel, SPI will take immediate corrective action. Maintain records of all observations and corrective actions taken.</td>
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<td></td>
<td>WAC 173-400-040(1) (9/20/93)</td>
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<td></td>
<td>WAC 173-400-040(1) (2/10/05 State only)</td>
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<td>4.2</td>
<td>NWCAA 455.1 (4/14/93) NWCAA 455.1 (5/11/95 State only)</td>
<td>PM Emissions shall not exceed 0.10 grain/dscf (corrected to 7% oxygen), except, from all gaseous and distillate fuel burning equipment (the definition of fuel burning equipment does not include internal combustion engines), emissions shall not exceed 0.05 grain/dscf (0.11 g/m³) corrected to 7% oxygen.</td>
<td>Directly enforceable If, during the monthly inspection required in Term 4.1, or at any other time, visible emissions are observed by plant personnel, SPI will take immediate corrective action and will maintain records of observations and corrective action taken.</td>
</tr>
<tr>
<td>4.3</td>
<td>WAC 173-400-060 (3/22/91)</td>
<td>PM Particulate emissions from general process units shall not be greater than 0.1 grain/dscf.</td>
<td></td>
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<tr>
<td>4.4</td>
<td>WAC 173-400-050(1) (2/10/05 State only) WAC 173-400-050(1) (3/22/91)</td>
<td>PM Particulate emissions from combustion units shall not be greater than 0.1 grains/dscf.</td>
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</tr>
<tr>
<td>4.5</td>
<td>NWCAA 520 (4/14/93) NWCAA 520 (5/9/96 State Only)</td>
<td>Sulfur Compounds Sulfur content of fuels burned shall not exceed: #1 distillate - 0.3% #2 distillate - 0.5% Other distillate or solid fuels - 2.0% Gaseous fuels - 412 ppm @ stp</td>
<td>For terms 4.5 through 4.9, Comply with Term 5.1.9 (burn inherently low sulfur fuels – wood and natural gas only)</td>
</tr>
<tr>
<td>4.6</td>
<td>NWCAA 460 (8/9/78) NWCAA 460 (7/14/05 State Only)</td>
<td>Sulfur compounds Sulfur compound emissions, as sulfur dioxide, shall not exceed 1.5 lb/MMBtu of heat input per hour, on a monthly average basis for the facility.</td>
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<td>Permit Term</td>
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<td>4.7</td>
<td>NWCAA 462 (10/14/87) NWCAA 462 (3/13/97 State only)</td>
<td><strong>Sulfur Compounds</strong> Sulfur compounds emitted greater than 1,000 ppm (corrected to 7% O\textsubscript{2}) averaged over a period of sixty consecutive minutes from any equipment is prohibited. This requirement is not violated if reasonable evidence is presented that concentrations will not exceed ambient standards and the permittee shows that no practical method of reducing concentration exists.</td>
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<tr>
<td>4.8</td>
<td>NWCAA 410 (4/14/93)</td>
<td><strong>SO\textsubscript{2}</strong> Unlawful to emit sulfur oxides (measured as SO\textsubscript{2}) such that ambient standards are exceeded outside plant boundaries</td>
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<td>4.9</td>
<td>WAC 173-400-040(6) (9/20/93) The second paragraph of this citation is State Only (2/10/05)</td>
<td><strong>SO\textsubscript{2}</strong> Unlawful to emit SO\textsubscript{2} greater than 1,000 ppmvd corrected to 7% O\textsubscript{2} averaged over a sixty consecutive minute period.</td>
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<td>4.10</td>
<td>NWCAA 530 (3/09/00 State Only)</td>
<td>Nuisance</td>
<td>Discharge of air contaminants likely to be injurious or cause damage to human health, plant or animal life or property, or which unreasonably interferes with enjoyment of life and property, is unlawful. Directly enforceable</td>
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<tr>
<td></td>
<td>WAC 173-400-040(5) (9/20/93) WAC 173-400-040(5) (2/10/05) State Only</td>
<td>Nuisance</td>
<td>Emissions detrimental to health or property prohibited.</td>
</tr>
<tr>
<td>4.12</td>
<td>WAC 173-400-040(4) (2/10/05 State Only)</td>
<td>Odors</td>
<td>Must use recognized good practice and procedures to reduce odors which may unreasonably interfere with any other property owner's use and enjoyment of his property to a reasonable minimum.</td>
</tr>
<tr>
<td>4.13</td>
<td>NWCAA 535.1 (3/09/00 State Only)</td>
<td>Odors</td>
<td>Install and operate Best Available Control Technology (BACT) to reduce emission of odor bearing gases or particulate matter. Discharge of odorous substances that threaten the health or safety of any person or unreasonably interfere with the use and enjoyment of property is prohibited.</td>
</tr>
<tr>
<td>Permit Term</td>
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| 4.14        | NWCAA 550.1-3 (4/14/93) | **Fugitive Emissions**  
Best Available Control Technology is required to prevent the release of fugitive matter to the ambient air during activities such as but not limited to: material handling, construction, abrasive blasting, use of roadways and open areas. Nuisance particulate fallout prohibited. | *Directly enforceable*  
Comply with Terms 4.1 and 4.10. |
| 4.15        | NWCAA 550.1-3 (11/8/07 State Only)  
WAC 173-400-040(3)(a) (9/20/93)  
WAC 173-400-040(3)(a) (2/10/05 State Only) | **Fugitive Emissions**  
Reasonably Available Control Technology is required to prevent the release of fugitive matter to the ambient air during activities such as but not limited to: material handling, construction, abrasive blasting, use of roadways and open areas. Nuisance particulate fallout prohibited. | |
| 4.16        | WAC 173-400-040(8)(a) (9/20/93)  
WAC 173-400-040(8)(a) (2/10/05 State Only) | **Fugitive Emissions**  
Reasonable precautions to prevent release of fugitive dust required. Maintain and operate source to minimize emissions. | |
| 4.17        | OAC 938b, Condition 1, 2/23/09 | **General**  
Sierra Pacific Industries (SPI) shall comply with all of the requirements of the most current version of PSD Permit # PSD-05-04 issued by the Washington State Department of Ecology (WDOE) for this project. | *No additional MR&R requirements* |
<table>
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</table>
| 4.18        | OAC 938b, Condition 2 2/23/09 | Fugitive emissions, including but not limited to any of the following, shall be controlled at all times such that no visible emissions are detected at any point beyond the plant property line as determined using 40 CFR 60 Appendix A Method 22.  
  a) Dust from unpaved roads or any other non-vegetation-covered area;  
  b) Fugitive sawdust from fuel-handling devices and/or storage areas;  
  c) Ash which is processed by the ash handling system or is removed from the wood-fired boiler by other means. Such ash shall be stored in closed containers and disposed of in such a manner so as to not create a public nuisance. Ash shall be transported in a wet condition in covered containers at all times. It shall be the responsibility of the plant owner/operator to insure that any and all contract or company carriers adhere to this condition;  
  d) Accumulation of sawdust or ash on outside surfaces, including but not limited to the main building, boilers, electrostatic precipitator, support pads, road areas. Surfaces shall be cleaned on a regular basis to prevent the build-up of ash and/or fugitive dust. | Directly enforceable  
Comply with Terms 4.1 and 4.10.  
If, during the monthly inspection or at any time, visible emissions are observed by plant personnel, SPI shall conduct Method 22 testing, or take immediate corrective action until the situation causing fugitive emissions is resolved. SPI shall maintain records of 40 CFR 60 Appendix A Method 22 observations and corrective actions taken. SPI shall remove accumulations of sawdust or ash on outside surfaces on a monthly basis in order to assist in future inspections. |
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</table>
| 4.19        | OAC 938b, Condition 3, 2/23/09 | HAP emission limits  
  a) Emissions of acetaldehyde from the facility shall not exceed 33,844 lb/yr, 12-month total, calculated on a rolling monthly basis.  
  b) Emissions of acrolein from the facility shall not exceed 588 lb/yr, 12-month total, calculated on a rolling monthly basis.  
  c) Emissions of formaldehyde from the facility shall not exceed 6,917 lb/yr, 12-month total, calculated on a rolling monthly basis. | **Each month.** Sierra Pacific shall determine compliance with the emission limits using kiln throughput data, boiler operation data, and the emission factors listed below, unless otherwise approved by the NWCAA. Sierra Pacific shall include the monthly compliance determination with the quarterly reports required by PSD Permit # PSD 05-04  
  a) Acetaldehyde emission factors:  
     i) 1.64E-04 lb/MMBtu for the wood-fired boiler  
     ii) 113 lb/MMbf for kiln-drying Western hemlock  
     iii) 57 lb/MMbf for kiln-drying Douglas fir  
  b) Acrolein emission factors:  
     i) 3.15E-05 lb/MMBtu for the wood-fired boiler  
     ii) 1.6 lb/MMbf for kiln-drying Western hemlock  
     iii) 0.65 lb/MMbf for kiln-drying Douglas fir  
  c) Formaldehyde emission factors:  
     i) 1.72E-03 lb/MMBtu for the wood-fired boiler  
     ii) 1.24 lb/MMbf for kiln-drying Western hemlock  
     iii) 1.0 lb/MMbf for kiln-drying Douglas fir |
| 4.20        | PSD 05-04 Amendment 1 Conditions 2 and 17 (8/6/09) | Property boundary:  
  SPI shall maintain control of the facility property boundary including the area east of the rail spur and in the northwestern corner of the Fredonia Grange lot.  
  SPI shall maintain a fence to the extent of prohibiting public access. | The facility shall maintain records of agreements delineating property control for property within the facility boundary that is not owned by SPI. |
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<tbody>
<tr>
<td>4.21</td>
<td>PSD 05-04 Amendment 1 Condition 18 (8/6/09)</td>
<td>Ambient PM$<em>{2.5}$ monitoring On or before March 4, 2010, SPI shall have installed and begin operation of a PM$</em>{2.5}$ monitoring Monitoring shall continue until there are not less than 10 days sampled in each of the months of October through March with a cumulative average dry kiln PM$<em>{10}$ emission level greater than 27.5 lbs PM$</em>{10}$/day. Data may include days from any month of October through March in any year that follows the effective date of this permit.</td>
<td>Submit a proposal for the location and of a design to Ecology and the NWCAA for approval. Collect and maintain data and records, and submit reports in accordance with NWCAA Regulation 367 and Appendix A. SPI may request to terminate ambient PM2.5 monitoring with the written approval of Ecology and the NWCAA.</td>
</tr>
<tr>
<td>4.22</td>
<td>PSD 05-04 Amendment 1 Condition 27.4, 29 (08/06/09)</td>
<td>Recordkeeping: SPI will maintain monitoring, source test, CEM audit tests and process records at the Skagit County facility for at least 5 years. SPI will provide Ecology and the NWCAA with the monitoring and process records for any period within the 5-year archive, within 10 working days of request.</td>
<td>Cogen, planer mill baghouse, dry kiln, and anti-mold spray chamber O&amp;M manuals shall be maintained up to date to reflect any modifications of the equipment or its operating procedures at least to the extent they relate to the emission limitations specified in the conditions of this PSD permit: • Inspection and maintenance procedures and schedule • Prescribed acceptable ranges for operation • maintenance and calibration of all required monitors used to assure compliance with the terms and conditions of this permit</td>
</tr>
<tr>
<td>4.23</td>
<td>PSD 05-04 Amendment 1 Condition 27.3.4 (08/06/09)</td>
<td>Reporting emissions measured in excess of limits</td>
<td>Report as required in Section 2.5 including at a minimum: • time of the occurrence • magnitude of excess from the emission limit • duration of the excess • probable cause • corrective actions taken or planned • Any other agency contacted</td>
</tr>
</tbody>
</table>
SECTION 5 SPECIFICALLY APPLICABLE REQUIREMENTS

The cited requirements in the “Citation” column and incorporated herein by reference are applicable to emission units specified in the header of the table. These requirements are federally enforceable unless identified as “state only.” A requirement designated “state only” is enforceable only by the state or the NWCAA, and not by the EPA or through citizen suits. The “Description” column is a brief description of the applicable requirements for informational purposes only and is not enforceable. Periodic or continuous monitoring requirements, including testing, are specified in the “Monitoring, Recordkeeping and Reporting” (MR&R) column, which identifies MR&R obligations the source must perform as required by WAC 173-401-605(1) and 615(1) and (2) or the underlying requirement. MR&R obligations do not apply to insignificant emission units. The test method cited or any credible evidence may be used to determine compliance.

The requirements in the MR&R column labeled “Directly enforceable” are legally enforceable requirements added under the NWCAA’s “gap-filling” authority of WAC 173-401-615(1)(b) & (c), 10/17/02.

Some permit conditions in this section show emission limits in the “Description” column but no test frequency in the “MR&R” column. This is the result of an OAC or NESHAP condition that required an initial performance test that has been completed so there is no requirement for on-going testing. The limit, however, remains as an underlying condition of the permit and is, therefore, included.

5.1 Cogeneration Facility

Steam for the kilns is generated by the cogeneration facility. The cogeneration facility consists of a 430 MMBtu/hr, 250,000 lb/hr steam, McBurney Corp, biomass-fired water-wall boiler with a vibrating grate, a steam turbine, and a generator. The boiler burns wood residuals generated principally by the saw mill to produce high-pressure steam for the steam turbine. The steam turbine generator can generate up to 28 MW of electricity. A portion of the produced power is used on-site; the remaining power is sold to a public utility. Low-pressure steam is extracted from the steam turbine through a controlled extraction and used to heat the dry kilns. The boiler is equipped with two (2) natural gas burners, each rated at 62.5 MMBtu per hour, for start up and flame stabilization. The cogeneration unit design incorporates a selective non-catalytic reduction (SNCR) system to reduce emissions of oxides of nitrogen (NOx), and a multiclon and ESP to control particulate matter emissions.
### Table 5-1 Requirements applicable to EU-1, Cogeneration Facility

<table>
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<tr>
<th>Permit Term</th>
<th>Regulatory Citation</th>
<th>Regulatory Description</th>
<th>Monitoring, Recordkeeping, and Reporting Requirements</th>
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<tbody>
<tr>
<td>5.1.1</td>
<td>OAC 938b, Conditions 8 and 9 (2/23/09)</td>
<td>Boiler fuel requirements&lt;br&gt;Only clean hog fuel consisting of bark, sawdust, chips, and other wood waste from wood products industries shall be burned in the boiler. Clean hog fuel for purposes of this condition shall meet the following criteria:&lt;br&gt;a) Is derived from wood and is of a suitable size and moisture content to sustain adequate combustion;&lt;br&gt;b) Is free of contamination including, but not limited to, non-wood man-made materials, painted wood, wood treated with creosote or other wood preservatives, wood from construction/demolition activities, and wood contaminated with petroleum products.&lt;br&gt;Combustion of wet fuel, i.e., fuel with moisture content greater than or equal to 55 percent, shall not be considered as an affirmative defense to an excess emission condition for the wood-fired boiler. Use of such fuels is a foreseeable occurrence, and as such, compliance with all permit limits and applicable regulations shall be required at all times unless the NWCAAP has determined that the cause of the wet fuel condition is due to an unavoidable or emergency situation.</td>
<td>Inspect purchased hog fuel prior to acceptance. Reject contaminated fuel.</td>
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<td>Permit Term</td>
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| 5.1.2       | PSD 05-04 Amendment 1 Conditions 11 and 19 (08/06/09) | Boiler fuel data conversions “per MMBtu” shall be determined by:  
- 40 CFR Part 60 Appendix A, Method 19 Factors from table “F Factors for Various Fuels” (Table 19-2). The factor shall reflect the proportions of wood, bark, and natural gas in the fuel by either:  
  o Determining the wood and bark proportions of the fuel used during the test based on randomized fuel sampling following procedure outlined in the corresponding test plan approved by Ecology and Northwest Clean Air Agency, or  
  o A default assumption of equal proportions of wood and bark. Example: a 50:50 wood/bark mixture with no natural gas will have an $F_d$ factor of 9,420 dscf/MMBtu. | Maintain records of MMBtu determinations as required in the 40 CFR Part 60 Appendix A Method 19. |
| 5.1.3       | PSD 05-04 Amendment 1 Conditions 5 & 27.4.3 (08/06/09) | Boiler fuel - natural gas limitation  
The wood-fired cogeneration unit may burn natural gas in the wood-fired cogeneration unit only to ignite the fuel or to maintain good combustion. | Maintain records of natural gas consumed by the cogeneration unit. Records shall include date, times, quantity and the reason for use of natural gas by the cogeneration unit. |
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<tr>
<td>5.1.4</td>
<td>40 CFR Part 60 Subpart Db §60.42b(k)(2) § 60.44b(d) § 60.49b(d)(1) &amp; (r)(1) (1/28/09)</td>
<td>Boiler fuel - NOₓ and SO₂ limitation The annual capacity factor for natural gas shall not exceed 10 percent (0.10). The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month.</td>
<td>Record and maintain records of the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for natural gas and wood for the reporting period. Obtain and maintain at the affected facility fuel receipts from the fuel supplier that certify that the gaseous fuel meets the definition of natural gas. Reports shall be submitted to the Administrator certifying that only natural gas, wood, and/or other fuels that are known to contain insignificant amounts of sulfur were combusted in the affected facility during the reporting period.</td>
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| 5.1.5       | PSD 05-04 Amendment 1 Conditions 4.1.1 & 4.2.1 (08/06/09) | Boiler startup defined: Cold startup is one that starts or resumes feeding fuel of any type when the wood-fired cogeneration unit furnace temperature is 150 °F or lower. A cold startup ends upon the earlier of:  
   - Four hours after starting wood fuel feed to the boiler,  
   - Dry basis flue gas carbon dioxide concentration has been greater than or equal to 11% and less than or equal to 13% for one hour while the flue gas CO concentration has simultaneously not exceeded 260 ppmdv,  
   - Steam flow exceeded 150,000 pounds over the previous hour, or  
   - 24 hours after starting or resuming feeding fuel of any type.  
A warm startup is one that starts or resumes feeding fuel of any type when the wood-fired cogeneration unit furnace temperature is higher than 150 °F. A warm startup ends upon the earlier of:  
   - Four hours after starting wood fuel feed to the boiler,  
   - Dry basis flue gas carbon dioxide concentration has been greater than or equal to 11% and less than or equal to 13% for one hour while the flue gas CO concentration has simultaneously not exceeded 260 ppmdv,  
   - Steam flow exceeded 150,000 pounds over the previous hour, or  
   - Eight hours after starting or resuming feeding fuel of any type. | Directly Enforceable  
Maintain records in accordance with Section 2.4; furnace temperature, fuel feed start and stop, and steam production including times and dates to demonstrate that a startup has occurred. |
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| 5.1.6       | PSD 05-04 Amendment 1 Conditions 4.1.2 & 4.2.2 (08/06/09) | **Boiler shutdown** defined:  
A cold shutdown is one wherein wood fuel feed stops, and the furnace is allowed to cool to 150 °F or lower. A cold shutdown ends when:  
- No fuel of any type is being feed, and the furnace temperature is 150 °F or lower and the FD fan is off-line, or  
- 24 hours after wood fuel feed was stopped, whichever comes first.  
A warm shutdown is one wherein wood fuel feed stops, but the furnace temperature does not cool to 150 °F or lower before wood fuel feed is resumed.  
A warm shutdown ends when:  
- Wood fuel feed is resumed,  
- No fuel of any type is being feed, and the furnace temperature is 150 °F or lower (at which point the shutdown becomes a "cold shutdown"), or  
24 hours after wood fuel feed was stopped, whichever comes first. | **Directly enforceable**  
Maintain records of furnace temperature, fuel feed start and stop, and steam production, including times and dates to demonstrate that a shutdown has occurred. |
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<tr>
<td>5.1.7</td>
<td>OAC 938b, Conditions 4 and 5, 2/23/09</td>
<td><strong>Boiler stack opacity</strong>&lt;br&gt;The exhaust stack from the wood-fired boiler shall not emit any air pollutants which exhibit greater than the following opacity limitations:&lt;br&gt;• <strong>20% opacity</strong> for a period or periods aggregating more than 3 minutes in any 1 hour as measured by a COMS.&lt;br&gt;• <strong>5% opacity</strong> (1-hour average) as measured by a continuous opacity monitoring system (COMS), except for periods of soot-blowing.&lt;br&gt;• <strong>10% opacity</strong> (aggregated 3 minutes in any 1 hour) as measured by WA DOE Method 9A.&lt;br&gt;Soot-blowing shall occur as a regularly scheduled event and shall not exceed 1 hour per 8-hour shift.&lt;br&gt;Soot-blowing shall not cause the boiler stack to exceed <strong>10% opacity</strong> (1-hour average) as measured by COMS.&lt;br&gt;Deviations from the regular soot-blowing schedule that result in excess emissions shall trigger agency notification.</td>
<td>Install and operate a COMS for measurement of opacity at the wood-fired boiler/ESP exhaust stack, downstream from the particulate matter control device in accordance with NWCAA Regulation 367 and Appendix A and applicable 40 CFR Part 60 Appendix A and B specifications.&lt;br&gt;Record and maintain a soot-blowing schedule. Maintain records of soot-blowing including start and stop times.&lt;br&gt;Annually, conduct a 40 CFR 60 Appendix A Method 9 test. Notification and reports shall be provided to the NWCAA as specified in NWCAA Regulation Appendix A.</td>
</tr>
<tr>
<td>5.1.8</td>
<td>40 CFR Part 60 Subpart Db § 60.43(b)(f), § 60.46(b)(7), § 60.48(b)(a), (e)(1) § 60.49(b)(d), (f), (h)(3), (w) (1/28/09)</td>
<td><strong>Boiler stack opacity</strong>&lt;br&gt; SPI shall not cause to be discharged into the atmosphere any gases that exhibit greater than <strong>20% opacity</strong> (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity</td>
<td>Follow MR&amp;R in term 5.1.7&lt;br&gt;Maintain records of opacity&lt;br&gt;Submit excess emission reports for all 6-minute periods during which average opacity exceeds standards. The reporting period for the reports required under this subpart is each 6 month period. All reports shall be submitted to the NWCAA and shall be postmarked by the 30th day following the end of the reporting period.</td>
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| 5.1.9       | OAC 938b, Conditions 6 and 7 2/23/09 | Boiler stack ammonia limit
Emissions of ammonia from the wood-fired boiler shall not exceed
  - 50 ppmdv NH$_3$ corrected to 7% O$_2$ as a 24-hour average | Demonstrate compliance at least once every twelve months in accordance with Bay Area Air Quality Management District Source Test Procedure #1B (BAAQMD ST-1B) or alternative method approved by NWCAA. Monitor and record ammonia feed rate and NO$_x$ emissions during the tests.
Maintain and operate the boiler and urea injection system (SNCR system) in accordance with good air pollution control practices and in a manner minimizing particulate and visible emissions from the unit.
At least 30 days prior to any modification of the ammonia injection system, a written notification to the NWCAA is required and an updated Ammonia Emissions Monitoring Plan must be submitted evaluating a predictive relationship between boiler and SNCR parameters and emissions of ammonia.
  a) An initial plan shall be submitted to NWCAA for approval at least 30 days prior to startup and shall include specific operating parameters.
  b) A final plan shall be submitted to NWCAA for approval within 60 days after conducting the initial ammonia compliance test and shall contain source test results and the established relationship between the boiler and SNCR operating parameters and ammonia emissions. This plan shall define QA/QC procedures and corrective actions when parameter monitoring indicates the emission limit in Condition 6 may be exceeded. |
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| 5.1.10      | PSD 05-04 Amendment 1 Conditions 6.1, 20, 26.1, 26.3, and 27.3.3.2.1 (08/06/09) | Boiler stack NOₓ limits NOₓ emissions shall not exceed, on a daily average:  
• 0.13 lb NOₓ/MMBtu  
• 56 lb NOₓ/hr | Monitor continuing compliance with a CEMS that satisfies the requirements of 40 CFR 60.48b(b) through (f) and Section 2.1.9. Compliance will be determined from the arithmetic mean of the hours of valid NOₓ emissions data in lb NOₓ/MMBtu. Data that is "valid" shall be as defined in 40 CFR 60.13(h). A calendar day used for compliance monitoring shall have at least 18 hours of valid data. Valid data from any calendar day having fewer than 18 hours of valid data shall be included in either the following or preceding day's data, whichever is contiguous, and the 24-hour average calculated using the cumulative hours of the conjoined periods. Use EPA Method 19 for calculation of lb/MMBtu from ppm. Annual NOₓ CEMS RATA certification shall be conducted concurrently with CO CEMS RATA certification. Quarterly, submit NOₓ emissions data in continuing performance monitoring reports in accordance with 5.1.16. |
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| 5.1.11      | PSD 05-04 Amendment 1 Conditions 6.4, 24, and 27.3.3.2.8 (08/06/09) | ** Boiler stack SO₂ limits**  
SO₂ emissions shall not exceed:  
- **0.025 lb SO₂/MMBtu** on a 3-hour average, based on the heat input value of the fuel  
- **47.1 tons SO₂** over any consecutive 12-month period. | Demonstrate continuing compliance with the arithmetic mean of not less than three 1-hour Method 6, 6A, or 6C samples (unless an equivalent test method has been approved by Ecology and NWCAA) by an independent testing vendor at least once every 12 months, to coincide with RATA for the CEMS. Use Method 19 to develop a lb/MMBtu emission factor. Multiply emission factor by fuel heat input rate to determine SO₂ mass emissions.  
If three consecutive tests (each test being the average of three 1-hour samples) have emissions less than 0.019 lb/MMBtu, testing interval goes to at least once every 24 months. Any test with an average of 0.019 lb SO₂/MMBtu or greater causes the testing interval to go back to at least once every 12 months.  
Monitor continuous compliance on a monthly basis by multiplying SO₂ emission factor (developed during initial compliance test) by monthly average firing rates (unless an equivalent test method has been approved by Ecology and NWCAA). Calculate and show mass emission rates determined monthly using the appropriate procedures outlined in 40 CFR Part 60 Appendix A Method 19, unless otherwise approved by Ecology and NWCAA.  
**Quarterly**, submit SO₂ emissions data in continuing performance monitoring reports in accordance with 5.1.16. |
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| 5.1.12      | PSD 05-04 Amendment 1 Conditions 6.2, 21, 26.2 and 27.3.3.2 (08/06/09) | Boiler stack CO limits CO emissions shall not exceed;  
- **0.35 lb CO/MMBtu**, 1-hour average  
- **400 lb CO/hr** 1-hour average, during cold startups and shutdowns  
- **300 lb CO/hr** 1-hour average, during warm startups and shutdowns  
- **659 tons CO** in any consecutive 12-month period (including startups and shutdowns). | Monitor continuing compliance at all times the furnace temperature exceeds 150 °F by a CEMS that satisfies the requirements in 40 CFR 60, Appendix B, Performance Specification 4, 40 CFR 60, Appendix F and Section 2.1.9.  
Compliance shall be demonstrated averaging the arithmetic mean of the emissions data for each operating scenario and averaging period.  
The span and linearity calibration gas concentrations in Method 10 will be appropriate to the CO concentration limits specified in this condition.  
Use EPA Method 19 for calculation of CO emission factor in lb/MMBtu from ppm, using a value of 7.270E-08 pound of CO per standard cubic foot of stack gas. Multiply CO emission factor in lb/MMBtu by fuel input rate in MMBtu/hr to get CO emission rate in pounds per hour.  
**Quarterly**, submit CO emissions (lb/MMBtu and 12-month total data, as well as times, durations, and average hourly CO mass emissions for any cold or warm start-ups and shutdowns) in continuing performance monitoring reports in accordance with 5.1.16. |
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| 5.1.13      | PSD 05-04 Amendment 1 Conditions 6.3, 22.1, and 27.3.3.2.6 (08/06/09) | Boiler stack PM/PM$_{10}$/PM$_{2.5}$ limits (filterable + condensable) expressed as PM$_{10}$ emissions shall not exceed:  
  - **0.02 lb PM$_{10}$/MMBtu** 24-hour average, based on the heat input value of the fuel  
  - **37.7 tons PM$_{10}$** in any consecutive 12-month period | Monitor continuing compliance by conducting 40 CFR Part 60 Appendix A Methods 5 (in the manner prescribed in 40 CFR 60.46b(d)) and 202 by an independent testing vendor at least once every 12 months.  
  Compliance will be demonstrated from the arithmetic mean of not less than three 2-hour test samples.  
  The emission rate expressed in lb PM$_{10}$/MMBtu will be determined using the procedure described in 40 CFR 60.46b(d)(6). Equivalent concentration test methods may be used if approved in advance by Ecology and NWCAA.  
  Monitor compliance with the mass emission limit calculating the arithmetic mean of the test results in tpy PM$_{10}$ based on monthly average firing rates.  
  If three consecutive tests (each test being the average of three 2-hour samples) have emissions less than 0.015 lb/MMBtu, testing interval goes to at least once every 24 months. Any test with an average of 0.015 lb/MMBtu or greater causes the testing interval to go back to at least once every 12 months.  
  **Quarterly**, submit PM$_{10}$ emissions (12-month total data) in continuing performance monitoring reports in accordance with 5.1.16. |
| 5.1.14      | 40 CFR Part 60 Subpart Db § 60.43b(h)(4), § 60.46b(b), (d)(1)-(6), (i), § 60.49b(d)(1/28/09) | Boiler stack PM limit  
Emission of particulate matter shall not exceed  
- **0.085 lb PM/MMBtu**  
Standard applies at all times, except during periods of startup, shutdown or malfunction. | Demonstrate compliance by performance testing in accordance with 40 CFR Part 60 Appendix A, Methods 1, 3 and 5 upon request by the administrator.  
Maintain records of each fuel combusted on a daily basis as required in Section 2.4 |
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| 5.1.15      | PSD 05-04 Amendment 1 Conditions 6.5, 25.1, and 27.3.3.2.10 (08/06/09) | Boiler stack VOC limits  
Emissions calculated as propane (MW 44) shall not exceed:  
- **0.019 lb VOC/MMBtu** 1-hour average, based on the heat input value of the fuel  
- **35.8 tons VOC** in any consecutive 12-month period | Monitor continuous compliance with the arithmetic mean of not less than three Method 25, 25A, or 25B samples (unless an equivalent test method has been approved by Ecology) by an independent testing vendor at least once every 12 months, to coincide with RATA for the CEMS. Use Method 19 (with VOC as propane) and fuel heat input rate to determine VOC mass emissions.  
If three consecutive tests (each test being the average of three 1-hour samples) have emissions less than 0.014 lb/MMBtu, testing interval goes to at least once every 24 months. Any test with an average of 0.014 lb/MMBtu or greater causes the testing interval to go back to at least once every 12 months.  
Monitor continuous compliance on an hourly basis by multiplying VOC emission factor (developed during most recent compliance test) by hourly average firing rates (unless an equivalent test method has been approved by Ecology and NWCAA).  
Monitor continuous compliance on a monthly basis from the arithmetic mean of the most recent test results and monthly average firing rates. Mass emission rates will be determined using Method 19 with indicated calculations modified to be applicable to VOCs measured as propane (unless an equivalent test method has been approved by Ecology and NWCAA).  
**Quarterly,** submit VOC emissions (12-month total data) in continuing performance monitoring reports in accordance with 5.1.16. |
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<tr>
<td>5.1.16</td>
<td>PSD 05-04 Amendment 1 Condition 27.3 (08/06/09)</td>
<td>Boiler reports: <strong>Quarterly</strong>, submit continuing compliance reports to NWCAA and Ecology (postmarked no later than one calendar month after the close of each respective calendar quarter) which shall include:</td>
<td>The report shall include: Certification by the responsible party for the facility that the relevant equipment was operated and maintained in accordance with the O&amp; M Manual. NO\textsubscript{X} emissions (lb/MMBtu) since the last report CO emission (lb/MMBtu) since the last report For each month since the last report, show the 12-month CO mass emissions ending with that month The times, durations, and average hourly CO mass emissions for any cold or warm start-ups and shutdowns Results of any required source tests for PM\textsubscript{10} since the last report 12-month PM\textsubscript{10} mass emissions ending with that month Results of any required source tests for SO\textsubscript{2} since the last report For each month since the last report, show the 12-month SO\textsubscript{2} mass emissions ending with that month Results of any required source tests for VOCs since the last report For each month since the last report, show the 12-month VOC mass emissions ending with that month. The duration and nature of any CEMS down-time excluding zero and span checks Results of any CEMS audits or accuracy checks</td>
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<tr>
<td>5.1.17</td>
<td>40 CFR §72.6(b)(4)(ii) (3/1/01)</td>
<td><strong>Cogeneration unit regulatory status:</strong> Supply equal to or less than one-third the potential electrical output capacity or equal to or less than 219,000 MWe-hrs actual electric output on an annual basis to any utility power distribution system for sale (on a gross basis). If in any three calendar year period, the unit sells to a utility power distribution system an annual average of more than one-third of its potential electrical output capacity and more than 219,000 MWe-hrs actual electric output (on a gross basis), that unit shall be an affected unit, subject to the requirements of the Acid Rain Program.</td>
<td><strong>Directly enforceable</strong> Maintain records of electricity generation and sales in accordance with Section 2.4.</td>
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5.2 Cooling Towers

The facility’s cooling tower condenses the steam from the turbine before it is returned to the boiler feedwater supply. The cooling tower is equipped with drift eliminators to reduce water loss associated with aerosol drift.

Table 5-2 Requirements applicable to EU-2, Cooling Towers

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<tr>
<td>5.2.1</td>
<td>OAC 938b, Condition 17 (2/23/09)</td>
<td>The owner or operator shall install, operate, and maintain drift eliminators with at least a 0.0005% design drift loss on the cooling tower.</td>
<td>The design drift loss shall be demonstrated by manufacturer specifications.</td>
</tr>
<tr>
<td>5.2.2</td>
<td>OAC 938b, Condition 18 (2/23/09)</td>
<td>Only water treatment chemicals that do not contain chromium or chromium-compounds shall be used in the cooling tower.</td>
<td>Material Safety Data Sheets (MSDS) for all water treatment chemicals shall be kept on-site.</td>
</tr>
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</table>
5.3 Planer Mill

Shavings and sawdust from the planer operation are collected by a vacuum system then carried by covered conveyor to the fuel house. SPI employs a high efficiency cyclone to collect dust from the interior of the planer mill and convey it to a wood residuals collection system. Pick-up points are located at the planer and the trimmer saw. A baghouse follows the cyclone to further control wood dust.

Table 5-3 Requirements applicable to EU-3, Planer Mill

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| 5.3.1       | PSD 05-04 Amendment 1 Conditions 7, 22.2, and 27.3.3.3 (08/06/09) | Planer baghouse stack PM/PM$_{10}$/PM$_{2.5}$ limits (filterable + condensable) expressed as PM$_{10}$ emissions shall not exceed:  
- 0.005 gr PM$_{10}$/dscf 1-hour average  
- 9.4 tons PM$_{10}$ in any consecutive 12-month period | Monitor continuous compliance by 40 CFR Part 60 Appendix A Methods 5 and 202 by an independent testing vendor at least once every 12 months. Compliance will be demonstrated from the arithmetic mean of not less than three 2-hour test samples. Equivalent concentration test methods may be used if approved in advance by Ecology and NWCAA.  
If three consecutive tests (each test being the average of three 2-hour samples) have PM$_{10}$ concentrations less than 0.0025 gr/dscf, testing interval goes to at least once every 36 months. Any test with an average PM$_{10}$ concentration of 0.0025 gr/dscf or greater causes the testing interval to go back to at least once every 12 months.  
Determine an emission factor, in units of lb/Mbf, based on the most recent PM$_{10}$ test results and the planer mill production rate maintained during the corresponding tests.  
Directly Enforceable  
Record quantity of lumber processed by the planer mill each month in units of Mbf.  
Within 30-days of the end of each month use the most recently determined emission factor to calculate PM$_{10}$ emissions in from the planer mill in lb/month. Add this value to PM$_{10}$ emissions for the most recent 11 months to and then divide by 2,000 to get tons PM$_{10}$ for the most recent consecutive 12-month period.  
Report PM$_{10}$ emissions according to term 5.3.2. |
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<tr>
<td>5.3.2</td>
<td>PSD 05-04 Amendment 1 Condition 27.3.3.1 and 27.3.3.3 (08/06/09)</td>
<td>Planer baghouse reports: Quarterly, submit continuing compliance reports to NWCAA and Ecology (postmarked no later than one calendar month after the close of each respective calendar quarter) which shall include:</td>
<td>The report shall include: Certification by the responsible party for the facility that the relevant equipment was operated and maintained in accordance with the O&amp;M Manual. PM\text{10} stack concentration from most recent compliance test in gr/dscf PM\text{10} emissions in lb/MMBtu, consecutive 12-month total, for each month of the reporting period.</td>
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5.4 **Dry Kilns**

The facility operates six double-track lumber drying kilns that have a throughput capacity of up to 400 MMbf/yr. The kilns could be run on a continuous basis throughout the year, if necessary, to meet production needs. Virtually all of the wood passing through the kilns is either hemlock or Douglas fir. As it dries, wood releases VOCs which pass to the atmosphere through the kiln vents.

**Table 5-4 Requirements applicable to EU-4, Dry Kilns**

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<tr>
<td>5.4.1</td>
<td>OAC 938b, Condition 10 &amp; 11 2/23/09</td>
<td>Lumber kilns HAP emissions SPI is allowed to process Western Hemlock and/or Douglas-Fir in the kilns.</td>
<td>No wood species other than Western hemlock or Douglas fir shall be processed in the kilns without prior written approval from the NWCAA. Each calendar month, SPI shall record the quantity of Douglas fir and the quantity of hemlock dried in each kiln for that month and for the previous 12 month period</td>
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<tr>
<td>5.4.2</td>
<td>OAC 938b, Condition 12 2/23/09</td>
<td>Lumber kilns HAP emissions At no time shall any kiln dry-bulb temperature setpoint or the actual dry-bulb temperature in any dry kiln exceed 200°F.</td>
<td>Sierra Pacific shall continuously monitor and record the dry-bulb temperature in each dry kiln using a device accurate to within ± 0.50 °F.</td>
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<tr>
<td>5.4.3</td>
<td>PSD 05-04 Amendment 1 Conditions 8.1, 8.1.1, 8.1.3, 23.2, 23.3, and 27.3.3.4 (08/06/09)</td>
<td>Lumber kilns PM/PM (<em>{10})/PM (</em>{2.5}) limits (filterable + condensable) expressed as PM (<em>{10}) emissions shall not exceed 5.86 tons PM (</em>{10}) in any consecutive 12-month period Daily kiln loading limits: If only hemlock: • 804 MBf/day If hemlock + other wood: • MBf (hemlock) = 1,608 - MBf (total day's load)</td>
<td>Monitor continuous compliance: for each wood species processed, separately determine drying kiln loading in board feet each day. Record the each kiln loading during all times the kiln temperature is in excess of 120°F. Each month's drying kiln PM (<em>{10}) emissions shall be determined based on each specie's emission factor: • Douglas fir: 0.02 lb PM (</em>{10})/Mbf • western hemlock: 0.04 lbPM10/Mbf • Other wood species o If ≤ 10% monthly production, use 0.04 lb/Mbf or value approved in writing by Ecology and NWCAA o If &gt; 10% monthly production, use value approved in writing by Ecology and NWCAA Quarterly, submit PM (_{10}) emissions (12-month total data) and daily kiln loading per species in continuing performance monitoring reports in accordance with 5.4.6.</td>
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| 5.4.4       | PSD 05-04 Amendment 1 Conditions 8.2, 25.2, and 27.3.3.4 (08/06/09) | Lumber drying kilns VOC limit VOC emissions, calculated as pinene (10 carbons per molecule, MW = 136) shall not exceed **120 tons VOC** in any consecutive 12-month period. | Operate the computerized steam management system for the dry kilns to minimize steam demand in accordance with the manufacturer's specifications. Record, on a monthly basis, dry kiln production each species of wood in board feet. Monitor continuous compliance monthly calculating VOC for each month's production for each species, based on the following VOC emission factors:  
  - Douglas Fir: 0.6 pound VOC per thousand board feet (lb/Mbf)  
  - Western Hemlock: 0.33 lb/Mbf  
  - Other wood species:  
    - If ≤ 10% monthly production, use 0.6 lb/Mbf or value approved in writing by Ecology and NWCAA  
    - If > 10% monthly production, use value approved in writing by Ecology and NWCAA  
Quarterly, submit VOC emissions (12-month total data) and daily kiln loading per species in continuing performance monitoring reports in accordance with 5.4.6.  
**Directly Enforceable**  
Add month's VOC emissions to previous 11 month's VOC emissions to get consecutive 12-month emissions. |
<p>| 5.4.5       | OAC 938b, Condition 13 2/23/09 | Opacity The opacity of emissions from the dry kilns shall not exceed 10% for a period or periods aggregating more than 3 minutes in any 1 hour, as determined by DOE Method 9A. | Monthly, conduct an opacity observation of the dry kilns month during operation. Inspections are to be performed during daylight hours while the kilns are in operation. If, during the scheduled inspection or at any other time, visible emissions other than uncombined water are observed, SPI shall, as soon as possible, but no later than within 24 hours of the initial observation, take corrective action until there are no visible emissions or, alternatively, record the opacity using DOE Method 9A or shut down the kiln until it can be repaired. |</p>
<table>
<thead>
<tr>
<th>Permit Term</th>
<th>Regulatory Citation</th>
<th>Regulatory Description</th>
<th>Monitoring, Recordkeeping, and Reporting Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.4.6</td>
<td>PSD 05-04 Amendment 1 Condition 27.3.2, 3, and 4 (08/06/09)</td>
<td><strong>Lumber kiln reports:</strong> Quarterly, submit continuing compliance reports to NWCAA and Ecology (postmarked no later than one calendar month after the close of each respective calendar quarter) which shall include:</td>
<td>The report shall include: Certification by the responsible party for the facility that the relevant equipment was operated and maintained in accordance with the O&amp; M Manual. • MBf per day totals for each day of the reporting period – by wood species • PM$_{10}$ emissions in tons/yr, consecutive 12-month total, for each month of the reporting period. • VOC emissions in tons/yr, consecutive 12-month total, for each month of the reporting period.</td>
</tr>
</tbody>
</table>
5.5 Anti-mold Spray Chamber

All lumber produced at the new sawmill is treated with a coating applied in a contained spray chamber. The spray chamber treats all cut lumber (dried as well as green) with two water-borne coatings, one that protects against sapstain, mold, mildew, decay, and bacteria during storage and transit, and another that brightens the lumber to improve its appearance. The spray chamber is located inside the planer mill, and exhausts to the atmosphere at a maximum flow rate of 1,000 acfm. The exhaust passes through a mist eliminator, and the condensed fluid from the mist eliminator is recycled back into the spray system.

Table 5-5 Requirements applicable to EU-5, Anti-mold Spray Chamber

<table>
<thead>
<tr>
<th>Permit Term</th>
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</tr>
</thead>
<tbody>
<tr>
<td>5.5.1</td>
<td>PSD 05-04 Amendment 1 Condition 3 (08/06/09)</td>
<td>Fugitive Emissions SPI-Skagit shall use only wood preservatives that have been approved by the USEPA under the Federal Insecticide, Fungicide, and Rodenticide Act.</td>
<td>Directly enforceable Maintain records, such as manufacturer specification sheet or MSDS, showing EPA approval.</td>
</tr>
</tbody>
</table>
| 5.5.2       | OAC 938b, Conditions 14 and 15 (2/23/09) | Fugitive Emissions SPI shall collect emissions from the spray chamber and shall vent all such emissions to a mist eliminator (demister). The demister shall be operated whenever anti-stain/brightener is applied. | SPI shall conduct monthly visual inspections during any month that the spray chamber is used, of the following:  
a) Ductwork, to ensure structural integrity (no corrosion, holes, etc.),  
b) Fan, to ensure proper fan operation, and  
c) Exhaust stack(s) and surrounding roof or structure, to ensure no anti-stain/brightener deposition which would indicate breakthrough or malfunction of the demister. If structural or mechanical problems are noted during such inspections, SPI shall correct problems identified by these inspections within 24 hours of initial discovery or discontinue anti-stain application. If anti-stain/brightener chemical deposition is discovered at the exhaust stack(s) or on surrounding roofs or structure, SPI shall perform a more detailed examination of the process to determine reasons for breakthrough, and SPI shall revise its Operation and Maintenance Plan to address any problems related to the breakthrough and any related problems with the demister within one week of initial discovery. Excess anti-stain/brightener deposition shall be removed from exhaust stack(s) and surrounding roofs or structure within 10 days of initial discovery. |
<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>5.5.3</td>
<td>OAC 938b, Condition 16 2/23/09</td>
<td>All anti-mold coating operations shall take place inside the spray chamber. Anti-mold coatings shall not be applied by hand or with hand held equipment.</td>
<td>No specific MR&amp;R for this term</td>
</tr>
</tbody>
</table>
| 5.5.4       | PSD 05-04 Amendment 1 Conditions 9, 25.3, 27.3.2, 3, and 5 (08/06/09) | Anti-mold spray chamber VOC emissions limit. VOC emissions shall not exceed **9 tons** in any consecutive 12-month period. Maintain as a "drip-free" design. Operate and maintain the spray chamber mist eliminator and condensate recycle system in accordance with the manufacturer's specifications. | **Quarterly**, submit continuing compliance reports to NWCAA and Ecology (postmarked no later than one calendar month after the close of each respective calendar quarter) that shall include:  
  - Certification by the responsible party for the facility that the relevant equipment was operated and maintained in accordance with the O& M Manual.  
  - VOC emissions per consecutive 12-month total, for each month of the reporting period.  
  
  **Directly Enforceable**  
  Monitor continuous compliance by recording consumption in gallons of each wood treatment material in the anti-mold spray system on a monthly basis. Calculate VOC emissions in pounds per month from each wood treatment material by multiplying gallons per month by proportion of VOC content in MSDS for that material. Add up all VOC emissions from anti-mold coating operations for that month. Add monthly VOC emissions to VOC emissions for previous 11 months. Divide by 2,000 to get tons per consecutive-12 month period. |
SECTION 6 INAPPLICABLE REQUIREMENTS

Many regulations do not apply to the emission units at SPI, in a specific or even in a general sense. Only requirements that are legally binding should be placed in this Air Operating Permit. Table 6.1 lists requirements that are deemed inapplicable to the facility. The basis for each determination of inapplicability is included.

Table 6-1 Inapplicable Requirements

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Emission Unit</th>
<th>Brief Discussion of Requirement</th>
<th>Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>40 CFR Part 60 Subpart Da</td>
<td>EU-1</td>
<td>New Source Performance Standards for electric utility steam generating units</td>
<td>Applies to fossil fuel fired systems. SPI only uses natural gas during startup and to maintain good combustion.</td>
</tr>
<tr>
<td>40 CFR Part 60 Subpart E</td>
<td>EU-1</td>
<td>New Source Performance Standards for incinerators</td>
<td>Only biomass and natural gas are fired in the boiler.</td>
</tr>
<tr>
<td>40 CFR Part 60 Subpart KKKK</td>
<td>EU-1</td>
<td>New Source Performance Standards for stationary combustion turbines</td>
<td>SPI operates a steam turbine.</td>
</tr>
<tr>
<td>40 CFR Part 60 Subpart Kb</td>
<td>Facility</td>
<td>New Source Performance Standards for Volatile Organic Liquid Storage Vessels</td>
<td>No storage vessels have been constructed at the facility.</td>
</tr>
<tr>
<td>WAC 173-400-050(2), (4), and (5)</td>
<td>Facility</td>
<td>Emission Standards for Combustion and Incineration Units</td>
<td>The facility burns only clean hog fuel and biomass residuals, and is therefore not an incinerator or waste combustion unit.</td>
</tr>
<tr>
<td>WAC 173-400-070(1), (3) – (8)</td>
<td>Facility</td>
<td>Emission Standards for Certain Source Categories</td>
<td>SPI does not operate a wigwam burner, orchard heater, grain elevator, catalytic cracking unit, sulfuric acid plant, or sewage sludge incinerator.</td>
</tr>
<tr>
<td>WAC 173-433</td>
<td>EU-1</td>
<td>Solid Fuel Burning Devices</td>
<td>As defined in WAC 173-433-030(9), EU-1 is not a solid fuel burning device (greater than 1 MMBtu/hr).</td>
</tr>
<tr>
<td>WAC 173-434</td>
<td>EU-1</td>
<td>Solid Waste Incinerator Facilities</td>
<td>As defined in WAC 173-434-030, the facility is not defined as a solid waste incinerator.</td>
</tr>
</tbody>
</table>