

September 12, 2018

Mr. Scott North
Sierra Pacific Industries, Inc.
3115 Kuper Rd
Centralia, WA 98531

Re: Issuance of FINAL Title V Air Operating Permit SW10-16-R2

Dear Mr. North:

The Southwest Clean Air Agency (SWCAA) is issuing a final Title V Permit, incorporating significant modifications, to Sierra Pacific Industries, Inc. The Title V Permit is being revised to incorporate the Permit modifications final in Air Discharge Permit 17-3248.

Copies of the final Air Operating Permit and Title V Basis Statement are accompanied with this letter. In addition, copies of the final permit will be available on SWCAA's website at www.swcleanair.org. If you have any questions or comments, please contact me at (360) 574-3058 ext. 129.

Sincerely,



Vanessa McClelland
Air Quality Engineer

Attachment

C: Part 70 Air Operating Permits
U.S. EPA Region 10, Mail Stop: OAW-150
1200 Sixth Avenue, Suite 155
Seattle, WA 98101



Sierra Pacific Industries, Inc. – Centralia Sawmill

Air Operating Permit

SW10-16-R2

Final Issued: September 12, 2018

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

AIR OPERATING PERMIT #: SW10-16-R2

ISSUED TO: Sierra Pacific Industries, Inc.
3115 Kuper Road
Centralia, WA 98531

PLANT SITE: Sierra Pacific Industries, Inc.
Centralia Sawmill
3115 Kuper Road
Centralia, WA 98531

NATURE OF BUSINESS: Sawmill
SIC/NAICS CODE: 2421/321113
AIRS NUMBER: 053-041-00022
EFFECTIVE DATE: September 12, 2018
EXPIRATION DATE: September 12, 2023
RENEWAL APPLICATION DUE: September 12, 2022


PERMIT ENGINEER:



Vanessa McClelland, Air Quality Engineer

9-12-18
Date

REVIEWED BY:

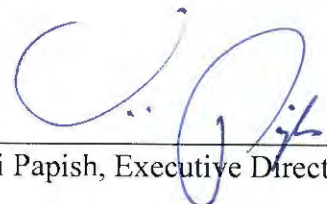


Paul T. Mairose, Chief Engineer

9/12/18
Date



APPROVED BY:



Uri Papish, Executive Director

9/12/18
Date

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I. ABBREVIATIONSList of Common Abbreviations

ADP	Air Discharge Permit (aka Order of Approval)
AOP	Air Operating Permit
BACT	Best available control technology
BF	Board feet
CAM	Compliance Assurance Monitoring
CMS	Continuous Monitoring Systems
CO	Carbon monoxide
CFR	Code of Federal Regulations
EPA	U.S. Environmental Protection Agency
EU	Emission unit
EU#	Refers to a specific emission unit numbered "#"
FCAA	Federal Clean Air Act
G#	Refers to a specific general term and condition numbered "#"
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous air pollutant
IEU	Insignificant emission unit
IEU#	Insignificant emission unit numbered "#"
M#	Refers to a specific monitoring requirement numbered "#"
MACT	Maximum Available Control Technology
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NR#	Nonapplicable requirement numbered "#"
NSR	New source review
NO _x	Oxides of nitrogen
O ₂	Oxygen
PM	Particulate matter
PM ₁₀	Particulate matter less than 10 microns in diameter
PTE	Potential to emit
R#	Refers to a specific reporting requirement numbered "#"
RACT	Reasonably available control technology
RCW	Revised Code of Washington
Region 10	Region 10 of the U.S. Environmental Protection Agency
Req-#	Applicable requirement numbered "#"
SDS	Safety data sheet
SIP	State implementation plan
SO ₂	Sulfur dioxide
SWCAA	Southwest Clean Air Agency
TAP	Toxic air pollutant
tpy	Tons per year
TSM	Total Selected Metals
VOC	Volatile organic compound
WAC	Washington Administrative Code

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

II. REGULATORY BASIS

This Air Operating Permit (AOP), hereafter referred to as the "Permit", is authorized under the procedures established in Washington Administrative Code (WAC) 173-401 and Title V (US Code §7661 et seq) of the Federal Clean Air Act (FCAA). As used in this Permit, "term", "condition", "standard", and "requirement" have the same meaning as "applicable requirement" specified under 40 Code of Federal Regulations (CFR) 70.2 and WAC 173-401-200.

The Permit is intended to contain a comprehensive list of the local, state, and federal air pollution regulations and standards applicable to the Permittee's facility and to assure and provide for certification of compliance with those requirements. Sections V through IX describe the applicable requirements and cite the originating local, state, or federal regulation or requirement. Federal requirements may be direct (e.g., FCAA or CFR citation) or established under the Washington State Implementation Plan (SIP). Each citation in the table also includes one or two effective dates of the cited regulation. Where there are two dates for the same regulatory citation, the underlying requirement is substantially the same, but the date of the regulation used for enforcement purposes would be different (e.g., federally enforceable versus SWCAA enforceable).

SWCAA is the primary authority that can enforce all requirements – federal, state, and local requirements – listed in the Permit. However, EPA and private citizens may also take enforcement actions under the Permit for those requirements that are federally enforceable; federal regulations, regulations that have a SIP date, and terms of ADPs are federally enforceable. Rules, regulations, and permits that are not SIP approved or federally promulgated are not federally enforceable.

The following three tables list the applicable regulations and effective dates of the regulations applicable to the facility:

<i>Federal Regulations</i>	Federal Regulation Version (Federally Enforceable)	SWCAA Delegation Version
40 CFR 51	July 1, 2017	Not Delegated
40 CFR 52	July 1, 2017	Not Delegated
40 CFR 60 Subpart A [§60.1 et seq]	July 1, 2017	July 1, 2015
40 CFR 61 Subpart A [§61.01 et seq]	July 1, 2017	July 1, 2015
40 CFR 61 Subpart E [§61.50 et seq]	July 1, 2017	July 1, 2015
40 CFR 63 Subpart A [§63.1 et seq]	July 1, 2017	July 1, 2015
40 CFR 63 Subpart ZZZZ [§63.6580 et seq]	July 1, 2017	July 1, 2015 (Title V Only)
40 CFR 63 Subpart DDDDD [63.7480 et seq]	July 1, 2017	July 1, 2015
40 CFR 68	July 1, 2017	Not Delegated
40 CFR 82	July 1, 2017	Not Delegated

For specific subparts of 40 CFR 60, 40 CFR 61, or 40 CFR 63 for which SWCAA has not been delegated implementation and enforcement authority by EPA, all monitoring, reporting, or recordkeeping that is required to be sent to the EPA Administrator must be sent to both SWCAA and EPA. Unless otherwise specified in the delegation agreement or in the regulation itself, once specific subparts of 40 CFR 60, 40 CFR 61, or 40 CFR 63 have been delegated to SWCAA by EPA, all monitoring, reporting, or recordkeeping required to be sent to EPA is only required to be sent to SWCAA.

<i>WA State Regulations</i>	SIP Regulation Version (Federally Enforceable)	WA State Regulation Version
WAC 173-400-105(7)	July 1, 2017	July 1, 2016
WAC 173-400-117	December 29, 2012	July 1, 2016
WAC 173-400-171	July 1, 2017	July 1, 2016
WAC 173-400-700	April 1, 2011	July 1, 2016
WAC 173-401	—	March 5, 2016
WAC 173-441	—	March 1, 2015
WAC 173-476	July 1, 2016	July 1, 2016

<i>SWCAA Regulations</i>	SIP Regulation Version (Federally Enforceable)	SWCAA Regulation Version
WAC 173-460 ¹	—	February 14, 1994
SWCAA 400-030	October 9, 2016 ²	June 18, 2017
SWCAA 400-040(1)	October 9, 2016 ³	June 18, 2017
SWCAA 400-040(2)	—	June 18, 2017
SWCAA 400-040(3)	October 9, 2016	June 18, 2017
SWCAA 400-040(4)	—	June 18, 2017
SWCAA 400-040(5)	October 9, 2016	June 18, 2017
SWCAA 400-040(6)	October 9, 2016	June 18, 2017
SWCAA 400-040(7)	October 9, 2016	June 18, 2017
SWCAA 400-040(8)	October 9, 2016	June 18, 2017
SWCAA 400-050(1)	October 9, 2016	June 18, 2017
SWCAA 400-050(2)	October 9, 2016	June 18, 2017
SWCAA 400-050(3)	—	June 18, 2017
SWCAA 400-060	October 9, 2016	June 18, 2017
SWCAA 400-070	October 9, 2016 ⁴	June 18, 2017

¹ The citation is a local-only adopted version of the state rule WAC 173-460 as adopted on February 14, 1994.

² The citation does not include second sentence in SWCAA 400-030(21) and 400-030(129).

³ The citation does not include SWCAA 400-040(1)(c) and (d).

⁴ Note that the SIP approved version of SWCAA 400-070 does not include 400-070(2)(a), 400-070(3)(b), 400-070(5), 400-070(6), 400-070(7), 400-070(8)(c), 400-070(9), 400-070(10), 400-070(11), 400-070(12), 400-070(14), and 400-070(15)(c).

<i>SWCAA Regulations</i>	SIP Regulation Version (Federally Enforceable)	SWCAA Regulation Version
SWCAA 400-072	October 9, 2016	June 18, 2017
SWCAA 400-075	—	June 18, 2017
SWCAA 400-076	—	June 18, 2017
SWCAA 400-081	October 9, 2016	June 18, 2017
SWCAA 400-091	October 9, 2016	June 18, 2017
SWCAA 400-100	—	June 18, 2017
SWCAA 400-101	—	June 18, 2017
SWCAA 400-103	—	June 18, 2017
SWCAA 400-105	October 9, 2016 ⁵	June 18, 2017
SWCAA 400-106	October 9, 2016 ⁶	June 18, 2017
SWCAA 400-107	September 21, 1995	June 18, 2017
SWCAA 400-109	October 9, 2016 ⁷	June 18, 2017
SWCAA 400-110	October 9, 2016 ⁸	June 18, 2017
SWCAA 400-113	October 9, 2016 ⁹	June 18, 2017
SWCAA 400-114	October 9, 2016	June 18, 2017
SWCAA 400-115	—	June 18, 2017
SWCAA 400-116	October 9, 2016	June 18, 2017
SWCAA 400-120	—	June 18, 2017
SWCAA 400-130	October 9, 2016	June 18, 2017
SWCAA 400-131	October 9, 2016	June 18, 2017
SWCAA 400-136	October 9, 2016	June 18, 2017
SWCAA 400-151	October 9, 2016	June 18, 2017
SWCAA 400-161	—	June 18, 2017
SWCAA 400-171	October 9, 2016 ¹⁰	June 18, 2017
SWCAA 400-200	October 9, 2016 ¹¹	June 18, 2017
SWCAA 400-205	October 9, 2016	June 18, 2017
SWCAA 400-270	October 9, 2016	June 18, 2017
SWCAA 425	—	June 18, 2017
SWCAA 476	—	June 18, 2017
SWCAA 400, Appendix A	October 9, 2016	June 18, 2017

⁵ The citation does not include reporting requirements related to WAC 173-460 or toxic air pollutants, not otherwise identified as HAPs.

⁶ The citation does not include SWCAA 400-106(1)(d)–(g) and 400-106(2).

⁷ The citation does not include the toxic air pollutant emissions thresholds in SWCAA 400-109(3)(d), 400-109(3)(e)(ii), and 400-109(4).

⁸ The citation does not include SWCAA 400-110(1)(d).

⁹ The citation does not include SWCAA 400-113(5).

¹⁰ The citation does not include SWCAA 400-171(2)(a)(xii).

¹¹ The citation does not include SWCAA 400-200(1).

The following table lists the currently active Air Discharge Permits (ADPs), issued by SWCAA under a federally-approved new source review program, that apply to the facility; the terms of the ADPs are federally enforceable through the Title V Permit, unless the underlying regulatory authority does not have a federally enforceable date as specified in the tables above.

<i>Minor New Source Review Permit</i>	Effective Date
ADP 17-3248	January 16, 2018

III. EMISSION UNIT IDENTIFICATION

ID #	Generating Equipment/Activity	Emission Control
EU-1	Log Yard	Wet suppression/water truck
EU-2	Sawmill - Planer, Bunkers	Total enclosure, baghouse (Carothers and Son), partial enclosure/wind screens
EU-3	Nebraska Hog Fuel Boiler	One multiclone followed by a two-field ESP and SNCR
EU-4	Dry Kilns	Process temperature limit
EU-5	Anti-Stain Treatment	Mist eliminator

For purposes of regulation under 40 CFR 63, Subpart DDDDD, the Nebraska hog fuel boiler is classified as an existing fuel cell boiler under the “units designed to burn biomass/bio-based solid fuel” classification.

IV. PERMIT PROVISIONS

- P1. Credible Evidence** 40 CFR 51.212
 40 CFR 52.12
 40 CFR 52.33
 40 CFR 60.11
 40 CFR 61.12

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

- P2. Confidentiality of Records and Information** WAC 173-401-500(5)
 WAC 173-401-620(2)(e)
 SWCAA 400-270

The Permittee is responsible for clearly identifying information that is considered proprietary and confidential prior to submittal to SWCAA. Requests for proprietary and confidential information shall be released only after legal opinion by SWCAA's legal counsel and notice to the Permittee of the intent to release or deny the release of information [SWCAA 400-270].

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

Upon request, the Permittee shall also furnish to the permitting authority copies of records required to be kept by the Permittee or, for information claimed to be confidential, the Permittee may furnish such records directly to the Administrator along with a claim of confidentiality. Permitting authorities shall maintain confidentiality of such information in accordance with Revised Code of Washington (RCW) 70.94.205 [WAC 173-401-620(2)(e)].

- P3. Insignificant Emission Unit - Permit Revision** WAC 173-401-530(6)

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

- P4. Permit Duration** WAC 173-401-610

This Permit shall be valid for a fixed term of five (5) years from the date of issuance.

P5. Standard ProvisionsWAC 173-401-620(2)
SWCAA 400-103

- (a) *Duty to comply.* The Permittee must comply with all conditions of this Chapter 401 Permit. Any Permit noncompliance constitutes a violation of RCW Chapter 70.94 and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit renewal application.
- (b) *Need to halt or reduce activity not a defense.* It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit.
- (c) *Permit actions.* This Permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the Permittee for a Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any Permit condition.
- (d) *Property rights.* This Permit does not convey any property rights of any sort, or any exclusive privilege.
- (e) *Duty to provide information.* The Permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Permit, or to determine compliance with the Permit. Upon request, the Permittee shall also furnish to the permitting authority copies of records required to be kept by the Permittee or, for information claimed to be confidential, the Permittee may furnish such records directly to the Administrator along with a claim of confidentiality. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70.94.205.
- (f) *Permit fees.* The Permittee shall pay fees in accordance with RCW 70.94.162 as a condition of this Permit in accordance with the permitting authority's fee schedule. Failure to pay fees in a timely fashion shall subject the Permittee to civil and criminal penalties as prescribed in RCW 70.94.430 and 70.94.431.
- (g) *Emissions trading.* No Permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Permit.
- (h) *Severability.* If any provision of this Permit is held to be invalid, all unaffected provisions of the Permit shall remain in effect and be enforceable.
- (i) *Permit appeals.* This Permit or any conditions in it may be appealed only by filing an appeal with the Pollution Control Hearings Board and serving it on the permitting authority within thirty days of receipt of the Permit pursuant to RCW 43.21B.310. This provision for appeal in this section is separate from and additional to any federal rights to petition and review under §505(b) of the FCAA.

- (j) *Permit continuation.* This Permit and all terms and conditions contained herein shall not expire until the renewal Permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect until the renewal Permit has been issued or denied if a timely and complete application has been submitted.

P6. Federally Enforceable Requirements

WAC 173-401-625

- (a) All terms and conditions in this air operating Permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens under the FCAA.
- (b) Notwithstanding the above, any terms and conditions included in this Permit that are not required under the FCAA or under any of its applicable requirements are not federally enforceable under the FCAA. Terms and conditions so designated are not subject to the EPA and affected states review requirements of WAC 173-401-700 through WAC 173-401-820. Terms that are SWCAA enforceable only are marked with "L".

P7. Permit Shield

WAC 173-401-640

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

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

P8. Permit Expiration – Application Shield

WAC 173-401-705(2)

WAC 173-401-710(3)

Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with WAC 173-401-710(1) and WAC 173-401-500. All terms and conditions of the Permit shall remain in effect after the Permit expires if a timely and complete Permit application has been submitted. Operation under the terms and conditions of the expired Permit will be allowed until SWCAA takes final action on the renewal application.

P9. Permit Revocation

WAC 173-401-710(4)

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

P10. Reopenings for Cause

WAC 173-401-730

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

- (a) Additional applicable requirements become applicable to a major air operating permit source with a remaining Permit term of three (3) or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the Permit is due to expire, unless the original Permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j);
- (b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the Permit;
- (c) The permitting authority or Administrator determines that the Permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Permit; or
- (d) The Administrator or the permitting authority determines that the Permit must be revised or revoked to assure compliance with the applicable requirements.

Proceedings to reopen and issue this Permit shall follow the same procedures as apply to initial Permit issuance and shall affect only those parts of the Permit for which cause to reopen exists. Reopenings under this section shall not be initiated before a notice of such intent is provided to the air operating permit source by the permitting authority. Such notice shall be made at least 30 days in advance of the date that the Permit is to be reopened, except that the permitting authority may provide a shorter time period in the case of an emergency.

P11. Changes not Requiring Permit Revision/Off Permit Changes

WAC 173-401-722

WAC 173-401-724

The Permittee may make 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, including the requirements to notify SWCAA and EPA. Changes made by the Permittee under WAC 173-401-724 do not qualify for a Permit shield.

P12. Excess Emissions

SWCAA 400-107

The Permittee shall report excess emissions to SWCAA as soon as possible. Excess emissions due to startup or shutdown conditions or due to scheduled maintenance shall be considered unavoidable provided the source reports as required under SWCAA 400-107 (1) and adequately demonstrates that the excess emissions could not have been prevented or avoided.

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

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

This requirement does not apply to federal standards.

V. GENERAL TERMS AND CONDITIONS**G1. Asbestos**40 CFR 61 Subpart M
SWCAA 400-075
SWCAA 476

The Permittee shall comply with the provisions of SWCAA 476 "Standards for Asbestos Control, Demolition and Renovation" when conducting any renovation, demolition, or asbestos storage activities at the facility.

G2. Chemical Accident Prevention Program

40 CFR 68

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

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

G3. Protection of Stratospheric Ozone

40 CFR 82, Subparts B and F

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

G4. Duty to Supplement or Correct Application

WAC 173-401-500(6)

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

G5. Certification40 CFR 63.6650(c)(2)
WAC 173-401-520

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

G6. Inspection and EntryWAC 173-401-630(2)
SWCAA 400-105(2 & 3)

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

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

G7. Schedule of ComplianceWAC 173-401-510(2)(h)(iii)
WAC 173-401-630(3)

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

G8. Permit Renewal Application

WAC 173-401-710(1)

The Permittee shall submit a complete Permit renewal application to SWCAA no later than the date established in the Permit. All terms and conditions of the Permit shall remain in effect after the Permit expires if a timely and complete Permit application has been submitted. Operation under the terms and conditions of the expired Permit will be allowed until SWCAA takes final action on the renewal application.

This Permit expires on **September 12, 2023**. A renewal application is due on **September 12, 2022**, one year prior to expiration, and a complete renewal application is due no later than **March 16, 2022**, 180 days prior to expiration.

G9. Transfer of Ownership or Operational Control

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

A change in Permittee due to transfer of ownership or operational control of an affected source requires a request for administrative Permit amendment as governed by WAC 173-401-720(1)(d).

G10. Portable SourcesSWCAA 400-110(6)
SWCAA 400-036

Portable sources which locate temporarily at the facility shall be allowed to operate at the temporary location without filing an air discharge permit application provided that:

- (a) The source/emission units are registered with SWCAA;
- (b) The source/emission units have an air discharge permit to operate as a portable source or have an approved Permit that meets the requirements that meet SWCAA 400-036;
- (c) The owner(s) or operator(s) notifies SWCAA of the intent to operate at the new location at least ten business days prior to starting the operation; and
- (d) The owner(s) or operator(s) supplies sufficient information including production quantities and hours of operation, to enable SWCAA to determine that the operation will comply with the emission standards for a new source, and will not cause a violation of applicable ambient air quality standards and, if in a nonattainment area, will not interfere with scheduled attainment of ambient standards.
- (e) Portable sources that do not have a valid air discharge permit issued by SWCAA, but do have a valid approval issued by a Washington air pollution control authority after July 1, 2010, may operate within SWCAA jurisdiction without filing an air discharge permit application pursuant to SWCAA 400-109 or obtaining an air discharge permit pursuant to SWCAA 400-110 provided the requirements of SWCAA 400-036 are met.

G11. Misrepresentation and Tampering

SWCAA 400-105(5 & 6)

- (a) The Permittee shall not make any false material statement, representation or certification in any form, notice, or report.
- (b) The Permittee shall not render inaccurate any monitoring device or method required under Chapter 70.94 RCW, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto.

G12. New Source ReviewWAC 173-400-700
WAC 173-460-040 (Local)
SWCAA 400-109
SWCAA 400-110

The Permittee shall not construct or modify a source which is required to be reviewed under WAC 173-400-700, WAC 173-460 (effective 2/14/1994), SWCAA 400-110, or SWCAA 400-800 without first receiving an approval or Permit under such provisions. Portable sources may be exempt from this requirement if they fulfill the criteria described in G10. This requirement is not applicable to emission units that comply with the provisions of SWCAA 400-072.

G13. Replacement or Substantial Alteration of Emission Control Technology at an Existing Stationary Source SWCAA 400-114

Prior to replacing or substantially altering emission control technology installed at an existing stationary source or emission unit, the Permittee shall file an air discharge permit application with SWCAA. Construction shall not commence on a project subject to review until SWCAA issues a Final air discharge permit or other regulatory order. However, any air discharge permit application filed under this section shall be deemed to be approved without conditions if the Agency takes no action within thirty days of receipt of a complete application.

G14. Maintenance of Process Equipment SWCAA 400-116(1)

Any process equipment, including features, machines, and devices constituting parts of or called for by plans, specifications, or other information submitted for approval or required as part of an approval shall be maintained and operate in good working order. The Agency reserves the right to take any and all appropriate action to maintain compliance with approval conditions, including directing the facility to cease operations of defective or malfunctioning equipment until corrective action can be completed.

G15. Maintenance of Pollution Control Equipment SWCAA 400-116(2)

Any equipment that serves as air contaminant control or capture equipment shall be maintained and operate in good working order at all times in accordance with good operations and maintenance practices and in accordance with Agency approval conditions. The Agency reserves the right to take any and all appropriate action to maintain compliance with approval conditions, including directing the facility to cease operations of defective or malfunctioning equipment until corrective action can be completed.

G16. Outdoor Burning SWCAA 425 (Local)

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

G17. Reporting of Emissions of Greenhouse Gases WAC 173-441 (State)

WAC 173-441 requires owners and operators of affected facilities to quantify and report emissions of greenhouse gases from applicable source categories listed in WAC 173-441-120. This regulation applies to any facility located in Washington State with total greenhouse gas emissions of ten thousand metric tons of carbon dioxide equivalent (CO₂e) or more per calendar year. The Permittee shall prepare and submit greenhouse gas reports to the Washington Department of Ecology in accordance with the provisions of WAC 173-441-050 for each affected facility.

VI. OPERATING TERMS AND CONDITIONS

The following table lists all federal, state, and local requirements applicable to the Permittee. The effective date for each applicable requirement is listed in Section II, which also describes the enforceability of the term. Those specific ADP requirements that are SWCAA enforceable only are denoted with "L". The legal authority for each requirement is listed below each requirement. Any requirement listed specified as "Plantwide" in the Emission Unit column, applies to all emission units or activities, regardless of whether identified as an EU or an IEU. Some of the requirements may have been fully or partially adopted into the Washington SIP, and are therefore federally enforceable. Requirements which are not required under the FCAA are State only or Local only requirements authorized under the WAC or SWCAA local regulations. Section II gives citations for the regulations and denotes whether they are federally, state, or locally enforceable. Monitoring requirements are used to provide a reasonable assurance of compliance with the applicable requirements and may or may not involve the use of a reference test method.

SW10-16-R2 revokes SW10-16-R1 conditional upon issuance of SW10-16-R2.

Req. #	Requirement	Emission Point	Monitoring
Req-1	Permittee shall not cause or permit any visible emissions which exceed 20% opacity for more than three minutes, in any one hour. Reference Test Method: SWCAA 400, Appendix A – SWCAA Method 9 SWCAA 400-040(1)(a)&(b)	Plantwide	M1
Req-2	Permittee shall not cause or permit fallout of particulate matter beyond the source's property boundary in sufficient quantity to interfere unreasonably with the use and enjoyment of the property on which the fallout occurs. SWCAA 400-040(2) (L)	Plantwide	M2, M4
Req-3	Permittee shall take reasonable precautions to prevent the release of fugitive emissions from any emission unit which is a source of fugitive emissions. SWCAA 400-040(3)(a)	Plantwide	M3, M4
Req-4	Permittee shall use recognized good practice and procedures to reduce odors to a reasonable minimum. SWCAA 400-040(4) (L)	Plantwide	M4
Req-5	Permittee shall not cause or permit emissions detrimental to persons or property. SWCAA 400-040(5)	Plantwide	M4

Req. #	Requirement	Emission Point	Monitoring
Req-6	<p>Permittee shall not cause or permit any emission unit to emit a gas containing sulfur dioxide in excess of 1,000 ppm of sulfur dioxide on a dry basis, based on an average of sixty consecutive minutes.</p> <p>Reference Test Method: 40 CFR 60, Appendix A - EPA Method 6</p> <p style="text-align: center;">SWCAA 400-040(6)</p>	Plantwide	M6
Req-7	<p>Permittee shall not cause or permit the installation or use of any means which conceals or masks an emission which would otherwise violate any provisions of SWCAA 400-040.</p> <p style="text-align: center;">SWCAA 400-040(7)</p>	Plantwide	M5
Req-8	<p>Permittee shall take reasonable precautions to prevent emissions of fugitive dust and operate the source to minimize emissions.</p> <p style="text-align: center;">SWCAA 400-040(8)(a) ADP 17-3248, Section 2.2.7</p>	Plantwide	M3, M4
Req-9	<p>Each pollution control device shall be operated whenever the processing equipment served by that control device is in operation with the exception of the ESP and SNCR during hog fuel boiler startups as discussed in Section 11 of the TSD for ADP 17-3248. Control devices shall be operated and maintained in accordance with the manufacturer's specifications. Furthermore, control devices shall be operated in a manner that minimizes emissions.</p> <p style="text-align: center;">ADP 17-3248, Section 2.2.9</p>	EU2, EU3, EU5	M2, M5
Req-10	<p>Emission units identified in this Permit shall be maintained and operated in total and continuous conformity with the emission levels and operational requirements specified in ADP 17-3248. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this Permit, including directing the facility to cease operations until corrective action can be completed.</p> <p style="text-align: center;">ADP 17-3248, Section 2.2.10</p>	EU1-EU5	N/A

Req. #	Requirement	Emission Point	Monitoring
Req-11	<p>At all times (except startup and shutdown), the Permittee shall operate and maintain the Nebraska hog fuel boiler, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.</p> <p style="text-align: center;">SWCAA 400-116 (1)&(2) 40 CFR 63, Subpart DDDDD: §63.7500(a)(3), §63.7500(f)</p>	EU3	M7, M18
Req-12	<p>Permittee shall not cause or permit emissions of particulate matter from a combustion or incineration emission unit in excess of 0.1 gr/dscf of exhaust gas corrected to 7% oxygen. Permittee shall not cause or permit emissions of particulate matter from an emission unit combusting wood derived fuels in excess of 0.2 gr/dscf of exhaust gas corrected to 7% oxygen.</p> <p>Reference Test Method: 40 CFR 60, Appendix A - EPA Method 5</p> <p style="text-align: center;">SWCAA 400-050(1)&(3)</p>	Plantwide	M2, M13
Req-13	<p>Permittee shall not cause or allow emissions of particulate matter from a general process unit (excludes combustion) in excess of 0.1 gr/dscf of exhaust gas.</p> <p>Reference Test Method: 40 CFR 60, Appendix A - EPA Method 5</p> <p style="text-align: center;">SWCAA 400-060</p>	Plantwide	M2, M11
Req-14	<p>Permittee shall not cause or permit any visible emissions from operation of the Nebraska hog fuel boiler which exceeds ten percent (10%) opacity for more than 3 minutes in any one-hour period except during boiler startup and shutdown, and periods of soot blowing/grate cleaning.</p> <p>Any COMS recorded 6-minute block average opacity value which has a 6-minute block average ESP exhaust gas temperature value (for the same time block) that is 175 °F or greater is valid opacity data. Values under 175 °F are invalid due to the potential for the presence of condensed moisture in the stack.</p> <p>Reference Test Method: SWCAA 400, Appendix A – SWCAA Method 9</p> <p style="text-align: center;">ADP 17-3248, Section 2.1.6</p>	EU3	M1

Req. #	Requirement	Emission Point	Monitoring
Req-15	<p>Permittee shall not cause or permit any visible emissions from operation of the dry kilns which exceeds five percent (5%) opacity for more than 3 minutes in any one-hour period.</p> <p>Reference Test Method: SWCAA 400, Appendix A – SWCAA Method 9</p> <p>ADP 17-3248, Section 2.1.6</p>	EU4	M1
Req-16	<p>Permittee shall not cause or permit any visible emissions from all other equipment at the facility which exceeds zero percent (0%) opacity for more than 3 minutes in any one-hour period.</p> <p>Reference Test Method: SWCAA 400, Appendix A – SWCAA Method 9</p> <p>ADP 17-3248, Section 2.1.6</p>	EU1, EU2, EU5	M1
Req-17	<p>Nebraska hog fuel boiler Filterable PM Emission Limits (Part 63): The Permittee shall not cause or allow filterable PM emissions from the Nebraska boiler stack that exceed the following limits, except during periods of startup and shutdown:</p> <ul style="list-style-type: none"> a) 2.0E-02 lb per MMBtu of heat input; or b) 5.5E-02 lb per MMBtu of steam output. <p>As an alternative to these limits, the Permittee may choose to demonstrate compliance with the total selected metals (TSM) limits listed below.</p> <p>Reference test methods as specified in Table 5 of Subpart DDDDD</p> <p>Collect a minimum of 2 dscm per run.</p> <p>40 CFR 63, Subpart DDDDD: §63.7500(a)(1); and Table 2</p>	EU3	M13, M15
Req-18	<p>Nebraska hog fuel boiler TSM Emission Limits (Part 63): As an alternative to the filterable PM limits listed above, the Permittee shall not cause or allow TSM emissions from the Nebraska boiler stack that exceed the following limits, except during periods of startup and shutdown:</p> <ul style="list-style-type: none"> a) 5.8E-03 lb per MMBtu of heat input; or b) 1.6E-02 lb per MMBtu of steam output. <p>Reference test methods as specified in Table 5 of Subpart DDDDD.</p> <p>Collect a minimum of 2 dscm per run.</p> <p>40 CFR 63, Subpart DDDDD: §63.7500(a)(1); and Table 2</p>	EU3	M13, M15

Req. #	Requirement	Emission Point	Monitoring
Req-19	<p>Nebraska hog fuel boiler CO Emission Limits (Part 63): The Permittee shall not cause or allow CO emissions from the Nebraska boiler stack that exceed the following limits, except during periods of startup and shutdown:</p> <ul style="list-style-type: none"> a) 1,100 ppm by volume on a dry basis corrected to 3 percent oxygen, 3-hr run average; or b) 2.4 lb per MMBtu of steam output. <p>Reference test methods as specified in Table 5 of Subpart DDDDD.</p> <p>One-hour minimum sampling time.</p> <p>40 CFR 63, Subpart DDDDD: §63.7500(a)(1); and Table 2</p>	EU3	M13, M15
Req-20	<p>Nebraska hog fuel boiler HCl Emission Limits (Part 63): The Permittee shall not cause or allow HCl emissions from the Nebraska boiler stack that exceed the following limits, except during periods of startup and shutdown:</p> <ul style="list-style-type: none"> a) 2.2E-02 lb per MMBtu of heat input; or b) 2.5E-02 lb per MMBtu of steam output. <p>Reference test methods as specified in Table 5 of Subpart DDDDD.</p> <p>For Method 26A, collect a minimum of 1 dscm per run; for Method 26, collect a minimum of 120 liters per run.</p> <p>40 CFR 63, Subpart DDDDD: §63.7500(a)(1); and Table 2</p>	EU3	M13, M15
Req-21	<p>Nebraska hog fuel boiler Mercury Emission Limits (Part 63): The Permittee shall not cause or allow Mercury emissions from the Nebraska boiler stack that exceed the following limits, except during periods of startup and shutdown:</p> <ul style="list-style-type: none"> a) 5.7E-06 lb per MMBtu of heat input; or b) 6.4E-06 lb per MMBtu of steam output <p>Reference test methods as specified in Table 5 of Subpart DDDDD.</p> <p>For Method 29, collect a minimum of 3 dscm per run; for Method 30A or Method 30B collect a minimum sample as specified in the method, for ASTM D6784 collect a minimum of 3 dscm.</p> <p>40 CFR 63, Subpart DDDDD: §63.7500(a)(1); and Table 2</p>	EU3	M13, M15

Req. #	Requirement	Emission Point	Monitoring																
Req-22	<p>Emissions from the Nebraska hog fuel boiler operation shall not exceed the following:</p> <table border="0"> <thead> <tr> <th data-bbox="289 390 407 422"><u>Pollutant</u></th> <th data-bbox="516 390 716 422"><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="289 426 354 457">NO_x</td> <td data-bbox="516 426 1052 457">58.52 tpy, 90 ppmvd @ 7% O₂ (24-hr avg)</td> </tr> <tr> <td data-bbox="289 462 337 493">CO</td> <td data-bbox="516 462 1084 493">105.35 tpy, 228 ppmvd @ 7% O₂ (24-hr avg)</td> </tr> <tr> <td data-bbox="289 497 493 529">PM/PM₁₀/PM_{2.5}</td> <td data-bbox="516 497 1187 569">14.30 tpy, 0.015 gr/dscf @ 7% O₂ (1-hr avg) (filterable only for compliance)</td> </tr> <tr> <td data-bbox="289 573 418 604">Ammonia</td> <td data-bbox="516 573 1052 604">5.81 tpy, 25 ppm @ 7% O₂ (24-hr avg) (L)</td> </tr> <tr> <td data-bbox="289 609 467 640">Acetaldehyde</td> <td data-bbox="516 609 667 640">0.06 tpy (L)</td> </tr> <tr> <td data-bbox="289 644 402 676">Acrolein</td> <td data-bbox="516 644 683 676">0.012 tpy (L)</td> </tr> <tr> <td data-bbox="289 680 472 711">Formaldehyde</td> <td data-bbox="516 680 667 711">0.67 tpy (L)</td> </tr> </tbody> </table> <p>The short-term emission limits identified above (hourly or 24-hr averaging time) shall not apply during boiler startup and shutdown periods and periods of soot blowing/grate cleaning.</p> <p style="text-align: center;">ADP 17-3248, Section 2.1.1</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO _x	58.52 tpy, 90 ppmvd @ 7% O ₂ (24-hr avg)	CO	105.35 tpy, 228 ppmvd @ 7% O ₂ (24-hr avg)	PM/PM ₁₀ /PM _{2.5}	14.30 tpy, 0.015 gr/dscf @ 7% O ₂ (1-hr avg) (filterable only for compliance)	Ammonia	5.81 tpy, 25 ppm @ 7% O ₂ (24-hr avg) (L)	Acetaldehyde	0.06 tpy (L)	Acrolein	0.012 tpy (L)	Formaldehyde	0.67 tpy (L)	EU3	M13, M14, M15
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Formaldehyde	0.67 tpy (L)																		
Req-23	<p>Emissions from lumber drying operations shall not exceed the following:</p> <table border="0"> <thead> <tr> <th data-bbox="289 1014 407 1045"><u>Pollutant</u></th> <th data-bbox="574 1014 774 1045"><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="289 1050 354 1081">VOC</td> <td data-bbox="574 1050 711 1081">117.13 tpy</td> </tr> <tr> <td data-bbox="289 1085 493 1117">PM/PM₁₀/PM_{2.5}</td> <td data-bbox="574 1085 695 1117">4.51 tpy</td> </tr> <tr> <td data-bbox="289 1121 467 1152">Acetaldehyde</td> <td data-bbox="574 1121 743 1152">10.24 tpy (L)</td> </tr> <tr> <td data-bbox="289 1157 402 1188">Acrolein</td> <td data-bbox="574 1157 743 1188">0.16 tpy (L)</td> </tr> <tr> <td data-bbox="289 1192 472 1224">Formaldehyde</td> <td data-bbox="574 1192 743 1224">0.33 tpy (L)</td> </tr> <tr> <td data-bbox="289 1228 407 1260">Methanol</td> <td data-bbox="574 1228 748 1260">11.95 tpy (L)</td> </tr> </tbody> </table> <p style="text-align: center;">ADP 17-3248, Section 2.1.2</p>	<u>Pollutant</u>	<u>Emission Limit</u>	VOC	117.13 tpy	PM/PM ₁₀ /PM _{2.5}	4.51 tpy	Acetaldehyde	10.24 tpy (L)	Acrolein	0.16 tpy (L)	Formaldehyde	0.33 tpy (L)	Methanol	11.95 tpy (L)	EU4	M8, M12		
<u>Pollutant</u>	<u>Emission Limit</u>																		
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Acrolein	0.16 tpy (L)																		
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Methanol	11.95 tpy (L)																		
Req-24	<p>Emissions from the anti-stain shall not exceed the following:</p> <table border="0"> <thead> <tr> <th data-bbox="289 1421 407 1453"><u>Pollutant</u></th> <th data-bbox="574 1421 774 1453"><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="289 1457 354 1488">VOC</td> <td data-bbox="574 1457 678 1488">1.70 tpy</td> </tr> </tbody> </table> <p style="text-align: center;">ADP 17-3248, Section 2.1.3</p>	<u>Pollutant</u>	<u>Emission Limit</u>	VOC	1.70 tpy	EU5	M10												
<u>Pollutant</u>	<u>Emission Limit</u>																		
VOC	1.70 tpy																		

Req. #	Requirement	Emission Point	Monitoring								
Req-25	<p>Emissions from the Carothers and Son baghouse shall not exceed the following:</p> <table border="0" data-bbox="289 386 1008 491"> <tr> <td><u>Pollutant</u></td> <td><u>Emission Limit</u></td> </tr> <tr> <td>PM/PM₁₀</td> <td>11.26 tpy, 0.005 gr/dscf (1-hr avg)</td> </tr> <tr> <td>PM_{2.5}</td> <td>2.58 tpy</td> </tr> </table> <p>Reference test method EPA Method 5.</p> <p style="text-align: center;">ADP 17-3248, Section 2.1.4</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM/PM ₁₀	11.26 tpy, 0.005 gr/dscf (1-hr avg)	PM _{2.5}	2.58 tpy	EU2	M9, M11		
<u>Pollutant</u>	<u>Emission Limit</u>										
PM/PM ₁₀	11.26 tpy, 0.005 gr/dscf (1-hr avg)										
PM _{2.5}	2.58 tpy										
Req-26	<p>Emissions from all bin unloading shall not exceed the following:</p> <table border="0" data-bbox="289 716 773 863"> <tr> <td><u>Pollutant</u></td> <td><u>Emission Limit</u></td> </tr> <tr> <td>PM</td> <td>41.18 tpy</td> </tr> <tr> <td>PM₁₀</td> <td>24.71 tpy</td> </tr> <tr> <td>PM_{2.5}</td> <td>9.45 tpy</td> </tr> </table> <p style="text-align: center;">ADP 17-3248, Section 2.1.5</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM	41.18 tpy	PM ₁₀	24.71 tpy	PM _{2.5}	9.45 tpy	EU2	M9
<u>Pollutant</u>	<u>Emission Limit</u>										
PM	41.18 tpy										
PM ₁₀	24.71 tpy										
PM _{2.5}	9.45 tpy										
Req-27	<p>Operations that cause or contribute to a nuisance odor shall use recognized good practice and procedures to reduce these odors to a reasonable minimum.</p> <p style="text-align: center;">ADP 17-3248, Section 2.2.8 (L)</p>	Plantwide	M4								
Req-28	<p>Exhaust gases from the Carothers and Son baghouse, anti-stain system, Nebraska hog fuel boiler, and dry kilns shall be discharged vertically. Any device that obstructs or prevents vertical discharge while in operation is prohibited.</p> <p style="text-align: center;">SWCAA 400-200(1) ADP 17-3248, Section 2.2.11</p>	EU2- EU5	M3								
Req-29	<p>The Nebraska boiler shall only be fired on wood products. The Permittee shall employ work practices to assure that only clean fuel is combusted in the hog fuel boiler.</p> <p style="text-align: center;">ADP 17-3248, Section 2.2.12</p>	EU3	M5								
Req-30	<p>A flow meter shall be installed and maintained operable to measure the ammonia usage of the SNCR system.</p> <p style="text-align: center;">ADP 17-3248, Section 2.2.13</p>	EU3	M5, M7								

Req. #	Requirement	Emission Point	Monitoring
Req-31	<p>The Carothers and Son baghouse shall be equipped with a differential pressure gauge to continuously measure the pressure differential (ΔP) across the filtering media. The baghouse shall be operated at all times the planer is in use.</p> <p style="text-align: center;">ADP 17-3248, Section 2.2.14, 15</p>	EU2	M5, M9
Req-32	<p>Work Practice Standards for the Nebraska hog fuel boiler (Part 63): The following work practice standards apply:</p> <p style="margin-left: 20px;">a. The Permittee shall conduct a one-time energy assessment performed by a qualified energy assessor that meets the requirements for energy assessments in Table 3 to Subpart DDDDD of Part 63. The Permittee shall have the opportunity to take credit for implementing energy conservation measures identified in the energy assessment in accordance with §63.7533</p> <p style="text-align: center;">40 CFR 63, Subpart DDDDD: §63.7500(a)(1); §63.7533(a); and Table 3</p>	EU3	N/A
Req-33	<p>Compliance Demonstration for the Nebraska hog fuel boiler (Part 63): The Permittee must demonstrate compliance with all applicable emission limits using:</p> <p style="margin-left: 20px;">a. Performance stack testing;</p> <p style="margin-left: 20px;">b. Fuel analysis for limits applicable to HCl, mercury or TSM; or</p> <p style="margin-left: 20px;">c. Continuous monitoring systems (CMS).</p> <p style="text-align: center;">40 CFR 63, Subpart DDDDD: §63.7505(c)</p>	EU3	M15, M16, M17, M18, M21, M22

Req. #	Requirement	Emission Point	Monitoring
Req-34	<p>Startup and Shutdown Standards for the Nebraska hog fuel boiler (Part 63): The following work practice standards apply:</p> <ol style="list-style-type: none"> a. The Permittee shall comply with all applicable emission limits at all times except for startup or shutdown periods conforming with the work practice standards in this condition; b. The Permittee must operate all continuous monitoring systems (CMS) during startup and shutdown; c. One, or a combination of, the following clean fuels shall be used during startup: natural gas, synthetic natural gas, propane, other Gas 1 fuels, distillate oil, syngas, ultra-low sulfur diesel, fuel oil-soaked rags, kerosene, hydrogen, paper, cardboard, refinery gas, liquefied petroleum gas, clean dry biomass, and any fuels meeting the appropriate HCl, mercury and TSM emission standards by fuel analysis; d. The Permittee must follow one of two startup work practice standards: <ol style="list-style-type: none"> 1) If using definition (1) of “startup” in §63.7575, once the Permittee starts firing fuels that are not clean fuels, the Permittee must vent emissions to the main stack and engage all of the applicable control devices except limestone injection in fluidized bed combustion boilers, dry scrubber, fabric filter, and selective catalytic reduction. The Permittee must start the limestone injection in FBC boilers, dry scrubber, fabric filter, and SCR systems as expeditiously as possible. Startup ends when steam or heat is supplied for any purpose; or 2) If using definition (2) of “startup” in §63.7575, once the Permittee starts to feed fuels that are not clean fuels, the Permittee must vent emissions to the main stack and engage all of the applicable control devices so as to comply with the emission limits within 4 hours of start of supplying useful thermal energy for heating, cooling, process purposes, or generating energy. The Permittee must engage and operate PM control within one hour of first feeding fuels that are not clean fuels. The Permittee, as specified at §63.7555(d)(13), may submit a request for a variance from the PM controls requirement. If a variance is granted, the Permittee must operate in accordance with its terms, which shall replace and supersede any inconsistent requirements included in this condition or in this permit. The Permittee must start all applicable control devices as expeditiously as possible, but, in any case, when necessary to comply with other standards applicable to the source by a permit limit or a rule other than 40 CFR 63, Subpart DDDDD that require operation of the control devices. The Permittee must develop and implement a 	EU3	M18, M23

Req. #	Requirement	Emission Point	Monitoring
	<p>written startup and shutdown plan as per §63.7505(e) if it chooses to comply using definition (2) of startup. Startup ends when steam or heat is supplied for any purpose; and,</p> <p>e. The Permittee must collect all monitoring data during periods of startup and shutdown required by this permit.</p> <p>40 CFR 63, Subpart DDDDD: §63.7500(a)(1); §63.7500(f); §63.7505(e); §63.7555(d)(13); and Table 3</p>		
Req-35	<p>Operating Limits for the Nebraska hog fuel boiler (Part 63): Following the date on which the initial compliance demonstration is completed or is required to be completed under §63.7 and §63.7510, whichever comes first, the Permittee shall maintain the following operating limits except during periods of startup and shutdown of the Nebraska hog fuel boiler:</p> <p>a. If the Permittee is demonstrating compliance by fuel analysis: maintain the fuel type or fuel mixture such that the applicable emission rates calculated according to §63.7530(c)(1), (2) and/or (3) are less than the applicable emission limits. (Only if the Permittee is demonstrating compliance via Fuel Analysis.);</p> <p>b. If the Permittee is demonstrating compliance by performance testing: maintain the 30-day rolling average operating load of the boiler such that it does not exceed 110 percent of the highest hourly average operating load recorded during the performance test demonstrating compliance. (Only if the Permittee is demonstrating compliance via Performance Testing.); and</p> <p>c. Maintain opacity to less than or equal to 10 percent opacity or the highest hourly average opacity reading measured during the performance test run demonstrating compliance with the PM (or TSM) emission limitation (daily block average).</p> <p>40 CFR 63, Subpart DDDDD: §63.7500(a)(2); §63.7500(f); §63.7540; §63.7; and Table 4</p>	EU3	M15, M16
Req-36	<p>Installation Requirements for Nebraska hog fuel boiler (Part 63): The Permittee must install, operate and maintain an oxygen analyzer system or install, certify, operate and maintain continuous emission monitoring systems for CO and oxygen according to the procedures in paragraphs §63.7525(a)(1) through (6). Note: The Permittee's boiler is a fuel cell and Table 2 does not provide a CEMS compliance alternative; therefore, the CO CEMS requirements do not apply.</p> <p>40 CFR 63, Subpart DDDDD: §63.7525(a)</p>	EU3	M7, M18, M20

Req. #	Requirement	Emission Point	Monitoring
Req-37	<p>Installation Requirements for Nebraska hog fuel boiler (Part 63): The Permittee must install, operate and maintain CMS to measure the operating load or steam generation.</p> <p style="text-align: center;">40 CFR 63, Subpart DDDDD: Table 7</p>	EU3	M5, M7
Req-38	<p>Installation Requirements for Nebraska hog fuel boiler (Part 63): The Permittee must install, operate and maintain each CMS according to the procedures in §63.7525(d)(1) through (5).</p> <p style="text-align: center;">40 CFR 63, Subpart DDDDD: §63.7525(d)</p>	EU3	M19
Req-39	<p>Dry kilns are approved for use with Douglas fir, hemlock, and spruce lumber only. Lumber made of other wood species may be dried provided that the following information is furnished to SWCAA for review prior to the start of drying operations:</p> <ul style="list-style-type: none"> (a) Identification of the wood species to be dried; (b) Emission factors for the proposed wood species; and (c) Estimated amount of wood to be dried. <p style="text-align: center;">ADP 17-3248, Section 2.2.16</p>	EU4	M8
Req-40	<p>The dry-bulb set point temperature of the dry kilns must not exceed 200°F on a 24-hr average.</p> <p style="text-align: center;">ADP 17-3248, Section 2.2.17</p>	EU4	M8
Req-41	<p>Dry kiln doors shall be kept closed at all times during active drying operations.</p> <p style="text-align: center;">ADP 17-3248, Section 2.2.18</p>	EU4	M3
Req-42	<p>Wood waste loadout bins shall have full length side wind barriers as well as shrouding/curtains on the ends to reduce fugitive particulate matter emissions.</p> <p style="text-align: center;">ADP 17-3248, Section 2.2.19</p>	EU2	M5
Req-43	<p>All VOC containing materials shall be collected in an enclosed container and not allowed to evaporate.</p> <p style="text-align: center;">ADP 17-3248, Section 2.2.20</p>	EU5	M5, M10
Req-44	<p>The use of a street sweeper (or similar device such as a water truck) on paved roads shall be used weekly when significant rainfall has not occurred, or more frequently as needed, to minimize fugitive dust and to keep the log yard clean.</p> <p style="text-align: center;">ADP 17-3248, Section 2.2.21</p>	EU1	M3

Req. #	Requirement	Emission Point	Monitoring
Req-45	During typical startup of the hog fuel boiler, the boiler must be operated to minimize emissions, which includes, but is not limited to, starting on clean fuels. The ESP shall be started no later than once the boiler exhaust temperature reaches 175°F. Startup periods following refractory work must not exceed 36 hours. ADP 17-3248, Section 2.2.22	EU3	M5, M23

VII. MONITORING TERMS AND CONDITIONS

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

M1. Visible Emissions Monitoring WAC 173-401-615(1)

This monitoring requirement applies to Requirements 1, 14, 15, and 16.

The Permittee shall perform monthly inspections of affected operations during daylight hours for the purpose of identifying potential visible emission violations. Whenever visible emissions are observed during the monthly inspection, or whenever visible emissions are indicated by a complaint, the Permittee shall verify the equipment causing the emissions. The Permittee shall within 60 minutes of observing visible emissions confirm whether the equipment involved is experiencing a malfunction and determine if all pollution control equipment is operating properly. If the equipment has an opacity limit higher than 0%, assure the equipment is operating within permitted limits using SWCAA Method 9 or EPA Method 9 as applicable to the emission unit. Within 24 hours of initial discovery, Permittee shall resolve the visible emissions or excess emissions problem, or notify SWCAA by the next calendar day of progress made in resolving the operational problem. Implementation of corrective action does not relieve the Permittee from the obligation of reporting permit deviations as specified in WAC 173-401-615(3). Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M2. Particulate Matter Emissions Monitoring WAC 173-401-615(1)
ADP 17-3248, Appendix D

This monitoring requirement applies to Requirements 2, 9, 12, and 13.

The Permittee shall perform monthly inspections of affected operations during daylight hours for the purpose of identifying potential particulate matter emissions violations. Whenever particulate matter fallout is observed during the monthly inspection the Permittee shall verify the equipment causing the emissions. The Permittee shall within 60 minutes of observing the emissions confirm whether the equipment involved is experiencing a malfunction and whether all air pollution control equipment is operating properly. The Permittee shall resolve particulate matter fallout within 24 hours of initial discovery or notify SWCAA by the next business day of the progress made in resolving the problem. Implementation of corrective action does not relieve the Permittee from the obligation of reporting permit deviations as specified in WAC 173-401-615(3). Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

Emission testing of the baghouse shall be conducted as specified in ADP 17-3248, Appendix D. Records of test results shall be maintained in accordance with Section VIII of this permit.

M3. Fugitive Emissions Monitoring

WAC 173-401-615(1)
ADP 17-3248 Section 2.2.11, 18, 21

This monitoring requirement applies to Requirements 3, 8, 28, 41, and 44.

The Permittee shall perform monthly inspections of affected operations during daylight hours for the purpose of identifying excess fugitive emissions. Whenever fugitive emissions are observed during the monthly inspection, the Permittee shall determine the source of the emissions and perform a visible emission evaluation using SWCAA Method 9 or EPA Method 9 as applicable to the emission unit. The Permittee shall within 60 minutes of discovery confirm whether the equipment involved is experiencing a malfunction, and whether reasonable precautions and good work practices are being employed to minimize emissions. Adjustments, repairs, or maintenance shall be performed on the emission unit or control equipment to reduce the fugitive emissions to a level at or below the applicable limit within twenty-four (24) hours of initial discovery of the fugitive emissions. For purposes of this condition reasonable precautions shall include, but not be limited to, the following:

- (a) The use of a street sweeper (or similar device such as a water truck) on paved roads shall be used weekly when significant rainfall has not occurred, or more frequently as needed to prevent fugitive dust and to keep the log yard clean;
- (b) Exhaust gas from the sawmill baghouse (EU-2), anti-stain (EU-5), Nebraska hog fuel boiler (EU-3) and dry kilns (EU-4) shall be discharged vertically into the ambient air. Any device that obstructs or prevents vertical discharge while in operation is prohibited; and
- (c) Dry kiln doors shall be kept closed at all times during active drying operations.

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

M4. Complaint Monitoring

WAC 173-401-615(1)

This monitoring requirement applies to Requirements 2, 3, 4, 5, 8, and 27.

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

M5. Compliance CertificationWAC 173-401-615(1)
ADP 17-3248 Section 2.2.12-14, 19, 2.3.26

This monitoring requirement applies to Requirements 7, 9, 29-31, 37, and 42-44.

The Permittee shall certify the following in each semiannual report:

- (a) Installed equipment does not conceal or mask any emissions which are otherwise in violation of general standards;
- (b) All VOC containing materials are collected in an enclosed container and not allowed to evaporate;
- (c) Only clean fuel is combusted in the Nebraska hog fuel boiler;
- (d) Each pollution control device is operated whenever the processing equipment served by that control device is in operation with the exception of the ESP and SNCR during hog fuel boiler startups;
- (e) Equipment capable of monitoring the following parameters on a continuous basis is installed and maintained:
 - (i) A continuous emission monitoring system (CEMS) and data acquisition and handling system (DAHS) shall be installed to monitor emission concentrations and emission rates of opacity, NO_x, CO, and O₂ from the Nebraska hog fuel boiler;
 - (ii) Dry kiln operating temperature for all kilns; and
 - (iii) Steam production, operating load, and excess oxygen of Nebraska hog fuel boiler.
- (f) A flow meter to record ammonia consumption shall be installed and maintained to monitor the ammonia usage of the SNCR system;
- (g) A differential pressure gauge which indicates the pressure differential across the filtering media of the Carothers and Son baghouse is installed and maintained; and
- (h) Wood waste loadout bins shall have full length side wind barriers as well as shrouding/curtains on the ends to reduce fugitive particulate matter emissions.

M6. SO₂ Emission Standard

WAC 173-401-615(1)

This monitoring requirement applies to Requirement 6.

The Permittee shall certify in each semiannual report that only hog fuel is used to fire the hog fuel boiler at Sierra Pacific.

M7. Monitoring of Hog Fuel Boiler Operations

ADP 17-3248 Section 2.3.28

This monitoring requirement applies to Requirements 11, 30, 36, and 37.

The Permittee shall monitor ESP, SNCR, and boiler operations as follows:

- (a) Multiclone differential pressure recorded daily

- (b) Secondary voltage in each ESP field recorded daily
- (c) Current level in each ESP field recorded daily
- (d) Spark rate in each ESP field recorded daily
- (e) Ammonia consumption (lb/month) recorded monthly
- (f) Hours of operation recorded monthly
- (g) Boiler/ESP outlet temperature recorded daily
- (h) Boiler steam flow rate monitored continuously and recorded as a 30-day rolling average
- (i) Maintenance and repair activities recorded for each occurrence
- (j) Emission testing/monitoring results recorded for each occurrence
- (k) Oxygen level in boiler exhaust monitored continuously and recorded as a 30-day rolling average
- (l) Periods of grate cleaning/soot blowing recorded for each occurrence
- (m) CEMS calibration results recorded for each occurrence
- (n) CEMS cylinder gas audit results recorded for each occurrence
- (o) CEMS maintenance/repair activities recorded for each occurrence

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

M8. Emissions from Lumber Drying

ADP 17-3248 Section 2.3.29

This monitoring requirement applies to Requirements 23, 39, and 40.

The Permittee shall monitor and record lumber drying operations as follows:

- (a) Amount, species, and final moisture of dried lumber recorded monthly
- (b) Emission testing results recorded for each occurrence
- (c) Dry kiln dry bulb temperature monitored continuously during operation and averaged on a daily basis

Periods of non-operation should be recorded as such. Records shall be available for inspection no later than 30 days from the last day of the month. Compliance with specified emission limits is to be calculated based on lumber throughput and emission factors provided by the respective Permits. Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M9. Material Handling Operations MonitoringWAC 173-401-615(1)
ADP 17-3248 Section 2.3.30, 32

This monitoring requirement applies to Requirements 25, 26, and 31.

The Permittee shall record monthly bone dry tons and type of wood waste unloaded from bins.

The Permittee shall monitor and record the Carothers and Son baghouse operations as follows:

- (a) Differential pressure recorded weekly
- (b) Hours of operation recorded monthly
- (c) Filter bag replacement recorded for each occurrence
- (d) Emission testing results recorded for each occurrence
- (e) Maintenance and repair activities recorded for each occurrence

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

M10. Anti-Stain Monitoring

ADP 08-2799R1 Section 2.3.31, 33

This monitoring requirement applies to Requirements 24 and 43.

The Permittee shall record monthly the amount and type of anti-stain product consumed.

For each new material which will result in emissions of toxic air pollutants as defined in WAC 173-460 [effective 2/94] or hazardous air pollutants, SWCAA shall be notified at least seven days in advance of the use.

The written notice shall include the following:

- (a) A description of the proposed change(s) in materials with an MSDS for each new material;
- (b) The date the change(s) is (are) to be made;
- (c) The change(s) in emissions of VOCs, HAPs and TAPs occurring as a result of the change; and
- (d) A summary of any applicable requirement(s) that would apply as a result of the change(s).

M11. Particulate Matter Emission Testing ADP 17-3248 Section 2.4.36

This monitoring requirement applies to Requirements 13 and 25.

The Permittee shall emission test the Carothers and Son baghouse every ten years, no later than the end of December 2016.

Emission testing shall be conducted as specified in Appendix C of this Permit. Records of test results shall be maintained in accordance with Section VIII of this permit.

M12. Lumber Drying Emission Testing ADP 17-3248 Section 2.4.35

This monitoring requirement applies to Requirement 23.

The Permittee shall emission test lumber drying within one year after achieving maximum intended operation. The kilns began operation on September 15, 2008. Subsequent emission testing shall be conducted on a five-year cycle, no later than the end of the calendar month in which the initial emission test was performed.

If no testing company with the ability to test emissions from wood drying is available, the facility should submit to SWCAA a letter proposing an alternate test schedule. This alternate test schedule must be approved by SWCAA.

Emission testing shall be conducted as specified in Appendix B of this Permit. Records of test results shall be maintained in accordance with Section VIII of this permit.

M13. Boiler Emission Testing 40 CFR 63 Section 7515, 7520, 7540
40 CFR 63 Tables 1, 5, 10
ADP 17-3248 Section 2.4.34

This monitoring requirement applies to Requirements 12 and 17-22.

The Permittee shall emission test the Nebraska hog fuel boiler every two years, no later than the end of the calendar month in which the initial emission test was performed, which was on April 9, 2008. Annual Relative Accuracy Test Audits (RATA) shall be performed no later than the end of the month of the initial emission test.

Emission testing shall be conducted as specified in Appendices A and D of this Permit. Records of test results shall be maintained in accordance with Section VIII of this permit.

For 40 CFR 63:

Initial Performance Testing: If the Permittee chooses to demonstrate compliance with applicable Subpart DDDDD emission limits through performance testing, then the Permittee shall conduct initial performance testing of the Nebraska hog fuel boiler for filterable PM or TSM, CO, HCl and mercury at representative operating load conditions

while burning the type of fuel or mixture of fuels that has the highest content of chlorine and mercury in accordance with applicable provisions in §63.7 as specified in Table 10:

- (a) The Permittee must develop a site-specific performance test plan according to 63.7(c). Performance testing shall be in accordance with requirements in §63.7(c), (d), (f), and (h), and in §63.7520 and Table 5 to Subpart DDDDD of 40 CFR 63;
- (b) If the Permittee chooses to comply with the alternative TSM limit, TSM shall be tested for instead of filterable PM; and
- (c) If the Permittee chooses to demonstrate compliance with the applicable CO limit using a CO CEMS, a performance evaluation of the CO CEMS shall be required instead of the initial CO performance testing and oxygen concentration operating limit requirements specified in §63.7510(a).

[§63.7; §63.7510(a)(1) and (c); §63.7515(i); §63.7520(a), (b), (c); Tables 2, 5, 7, and 10 to Subpart DDDDD of 40 CFR 63]

Ongoing Performance Testing: Where ongoing performance testing is required pursuant to Subpart DDDDD, the Permittee shall conduct ongoing performance testing of the Nebraska hog fuel boiler for filterable PM or TSM, CO, HCl and mercury at representative operating load conditions while burning the type of fuel or mixture of fuels that has the highest content of chlorine and mercury in accordance with applicable provisions in §63.7 as specified in Table 10:

- (a) The Permittee must develop a site-specific performance test plan according to 63.7(c). Ongoing performance testing shall be in accordance with methods and procedures in §63.7520, Table 5, and Table 7 to Subpart DDDDD of 40 CFR 63; and
- (b) Subsequent performance testing shall be conducted annually and no more than 13 months after the previous performance test, except as provided in §63.7515(b)-(c).

[§63.7; §63.7515(a), (b), (c), (g); §63.7520(a), (b), (c); §63.7540; Tables 5 and 10 to Subpart DDDDD of 40 CFR 63]

Records of test results shall be maintained in accordance with Section VIII of this permit.

M14. Boiler Continuous Emission Monitoring

ADP 08-2799R1 Section 2.3.27 and 2.4.34, Appendix A, B

This monitoring requirement applies to Requirement 22.

A CEMS shall be installed on the Nebraska hog fuel boiler exhaust stack to monitor NO_x, CO, and O₂ emissions as follows:

- (a) The Permittee shall install and maintain a system for monitoring the concentration and emission rate of CO, NO_x, and O₂ from the Nebraska hog fuel boiler exhaust

stack in accordance with the requirements and specifications found in the following regulations:

- 40 CFR 60, Appendix B - Performance Specification 2 "Specifications and Test Procedures for Sulfur Dioxide and Nitrogen Oxides Continuous Emission Monitoring Systems in Stationary Sources."
 - 40 CFR 60, Appendix B - Performance Specification 3 "Specifications and Test Procedures for Oxygen and Carbon Dioxide Continuous Emission Monitoring Systems in Stationary Sources."
 - 40 CFR 60, Appendix B - Performance Specification 4A "Specifications and Test Procedures for Carbon Monoxide Continuous Emission Monitoring Systems in Stationary Sources."
 - 40 CFR 60, Appendix F "Quality Assurance Procedures."
- (b) Hourly and 24-hour averages of the following data for the Nebraska hog fuel boiler shall be recorded by the DAHS and kept readily available for on-site inspection:
- NO_x emission concentration (ppmvd @ 7% O₂)
 - NO_x emission rate (lb/hr)
 - CO emission concentration (ppmvd @ 7% O₂)
 - CO emission rate (lb/hr)
 - O₂ concentration (dry volume percent)

Records of monitoring activities shall be maintained in accordance with Section VIII K2 of this permit. Relative accuracy test audit reports shall be reported to SWCAA as described in Section IX R6 of this permit.

Boiler MACT Monitoring Requirements

M15. Ongoing Compliance Demonstration Requirements

40 CFR 63 Section 7510, 7515, 7530, 7540

This monitoring requirement applies to Requirements 17-22, 33, and 35.

The Permittee shall demonstrate ongoing compliance with filterable PM or TSM, CO, HCl and mercury emission limits for the Nebraska hog fuel boiler by:

- (a) If compliance is chosen to be demonstrated through performance stack testing, then conduct annual performance testing according to §63.7520. If the performance tests for a given pollutant for at least 2 consecutive years show that the emissions are at or below 75% of the emission limit for the pollutant, and if there are no changes in the operation of the unit or control equipment that could increase, the Permittee may choose to conduct performance tests for the pollutant every third year;
- (b) Conducting a 5-year performance tune-up of the Nebraska hog fuel boiler according to §63.7540. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up (completed January 27, 2015);

- (c) If the Permittee elects to demonstrate compliance with the mercury, HCl, or TSM limits based on fuel analysis, conduct a monthly fuel analysis according to §63.7521 for each type of fuel burned in the Nebraska hog fuel boiler. The Permittee may comply with this monthly requirement by completing the fuel analysis any time within the calendar month as long as the analysis is separated from the previous analysis by at least 14 calendar days; if multiple samples are taken per month, the 14-day restriction does not apply. If each of 12 consecutive monthly fuel analyses demonstrates 75 percent or less of the compliance level, the Permittee may decrease the fuel analysis frequency to quarterly for that fuel. If any quarterly sample exceeds 75 percent of the compliance level, or a new type of fuel is burned, the frequency of the fuel analysis for that fuel must return to monthly;
- (d) The Permittee must meet the work practice standard according to 40 CFR 63 Table 3. During startup and shutdown, the Permittee must only follow the work practice standards according to item 5 of Table 3 (for startup) and item 6 of Table 3 (for shutdown) of Subpart DDDDD;
- (e) Ongoing compliance shall be demonstrated according to the methods specified in 40 CFR 63, Subpart DDDDD, Table 8; and
- (f) The Permittee must demonstrate continuous compliance with the Subpart DDDDD emission limits, work practice standards and operating limits in accordance with §63.7540, as applicable.
[§63.7510(a)(1); §63.7515(a), (b), (c), (d), (e), (i); §63.7530(b), (h); §63.7540(a)(10), (a)(12) to Subpart DDDDD of 40 CFR 63; §63.7]

M16. Fuel Analyses for Chlorine, Mercury and Total Suspended Metals (TSM)

40 CFR 63 Section 7510, 7515, 7521, 7530, 7540

This monitoring requirement applies to Requirements 33 and 35.

If the Permittee chooses to demonstrate compliance with the mercury, HCl, or TSM emission limits based on fuel analysis, monthly fuel analysis must be conducted according to §63.7521 for each type of fuel burned that is subject to an emission limit unless and until such time as fuel analysis frequency may be decreased as specified in Ongoing Compliance Demonstration Requirements and §63.7515(e). The Permittee shall conduct fuel analyses for chlorine and mercury according to the procedures in paragraphs (b) through (e) of §63.7521 for all fuels consumed in boilers except supplemental fuels used only during startup and shutdown or for transient flame stability.

- (a) The Permittee shall develop a site-specific fuel monitoring plan according to the procedures in §63.7521(b) and submit the plan to the Administrator for approval no later than 60 days before the date the Permittee intends to conduct an initial compliance demonstration;
- (b) Fuel analyses shall be conducted in accordance with the Permittee's site-specific fuel monitoring plan and shall conform to the methods and procedures in §63.7521 and Table 6 to Subpart DDDDD of 40 CFR 63;

- (c) During the initial fuel analysis, the Permittee shall establish the fuel mixture that has the highest content of chlorine using the procedures in paragraphs (b)(1)(i)-(iii) of §63.7530;
- (d) During the initial fuel analysis, the Permittee shall establish the fuel mixture that has the highest content of mercury using the procedures in paragraphs (b)(2)(i)-(iii) of §63.7530;
- (e) During the initial fuel analysis, the Permittee shall establish the fuel mixture that has the highest content of TSM using the procedures in paragraphs (b)(3)(i)-(iii) of §63.7530;
- (f) A fuel analysis may be used to demonstrate compliance with an emission limit for hydrogen chloride, mercury or TSM by following the procedures in §63.7521 and paragraph (c) of §63.7530; and
- (g) If the Permittee demonstrates compliance with an emission limit for hydrogen chloride or mercury through fuel analysis and a new type of fuel is planned to be burned, the emission rate shall be recalculated according to the procedures specified in §63.7530.

[§63.7510(a)(2)(i); §63.7515(e); §63.7521 (a), (b); §63.7530 (b)(1), (b)(2), (b)(3), (c); §63.7540 (a)(3), (a)(5); Table 6 to Subpart DDDDD of 40 CFR 63]

M17. Boiler Operating Limits

40 CFR 63 Section 7510, 7515, 7530

This monitoring requirement applies to Requirement 33.

The Permittee shall establish site-specific operating limits for the Nebraska hog fuel boiler as follows:

- (a) Site-specific operating limits shall be established for those parameters in Table 4 that apply to the boiler; and
- (b) Subsequent performance test results must verify that the operating limits for the boiler have not changed or provide documentation of revised operating limits established according to §63.7530 and Table 7, as applicable.

[§63.7510(a)(3); §63.7515(f); §63.7530; Tables 4 and 7 to Subpart DDDDD of 40 CFR 63]

M18. General Operating Requirements for CMS

40 CFR 63 Section 7500, 7505, 7510, 7525, 7535

This monitoring requirement applies to Requirements 11, 33, 34, and 36.

The following requirements apply to CMS required for the Nebraska hog fuel boiler as follows:

- (a) The Permittee shall maintain and operate each CMS in a manner consistent with good air pollution control practices;
- (b) The Permittee shall maintain and operate each CMS according to the procedures in paragraphs (d)(1) through (5) of §63.7525, as applicable;

- (c) The Permittee must operate and maintain each COMS and CMS in continuous operation according to the site-specific monitoring plan and each COMS according to §63.7525(c);
- (d) The Permittee, as applicable, must operate and maintain each CEMS used to comply with mercury or HCl limits according to §63.7525(l);
- (e) Except for periods of monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required monitoring system quality assurance or quality control activities (including, as applicable, system accuracy audits, calibration checks, and required zero and span adjustments), failure to collect required data is a deviation from the monitoring requirements;
- (f) The CMS must complete a minimum of one cycle of operation every 15-minutes and must have a minimum of four successive cycles of operation, one representing each of the four 15-minute periods in an hour, to have a valid hour of data;
- (g) The CMS shall be operated and shall collect data at all required intervals at all times that the boiler is operating and compliance is required, except for periods of monitoring system malfunctions or out of control periods as provided in §63.8(c)(7), and required monitoring system quality assurance or control activities, including, as applicable, calibration checks, required zero and span adjustments, and scheduled CMS maintenance as defined in the Permittee's site-specific monitoring plan. A monitoring system malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring system failures that are caused in part by poor maintenance or careless operation are not malfunctions;
- (h) The Permittee is required to complete monitoring system repairs in response to monitoring system malfunctions or out-of-control periods and to return the monitoring system to operation as expeditiously as practicable;
- (i) The Permittee may not use data recorded during periods of startup and shutdown, monitoring system malfunctions or out-of-control periods, repairs associated with monitoring system malfunctions or out-of-control periods, or required monitoring system quality assurance or control activities in data averages and calculations used to report emissions or operating levels. The Permittee must use all the data collected during all other periods in assessing compliance and the operation of the control device and associated control system;
- (j) The Permittee must record and make available upon request results of CMS performance audits and dates and duration of periods when the CMS is out of control to completion of the corrective actions necessary to return the CMS to operation consistent with the Permittee's site-specific monitoring plan;
- (k) Any 15-minute period for which the monitoring system is out-of-control and data are not available for a required calculation constitutes a deviation from the monitoring requirements. Other situations that constitute a monitoring deviation are specified in §63.7535(d);
- (l) The 30-day rolling average of all recorded readings shall be determined, except as provided in (e) above; and
- (m) Results of each inspection, calibration, and validation check shall be recorded.

[§63.7500(a)(3); §63.7505(d)(4); §63.7510(a)(4); §63.7525(c)(5), (d)(1), (d)(2), (d)(3), (d)(4), (d)(5), (l); §63.7535(b), (c), (d)(3) to Subpart DDDDD of 40 CFR 63; §63.8(1)(ii); §63.8(c)(3); §63.8(c)(4)(ii)]

M19. CMS Performance Evaluations

40 CFR 63 Section 7510, 7525

This monitoring requirement applies to Requirement 38.

The Permittee shall conduct a performance evaluation of each required CMS in accordance with the site-specific CMS monitoring plan.

- (a) CMS performance evaluations shall be conducted according to §63.7525;
- (b) Initial performance evaluations shall be completed no later than July 29, 2016; and
- (c) Subsequent performance evaluations for flow monitoring systems shall be conducted at the time of each performance test but no less frequently than annually.

[§63.7510(a)(4); §63.7525(a)(2)(i), (a)(2)(v), (e)(4) to Subpart DDDDD of 40 CFR 63; §63.8(e)]

M20. CO and Oxygen Monitoring

40 CFR 63 Section 7525, 7575

This monitoring requirement applies to Requirement 36.

The Permittee shall either install, operate, and maintain an oxygen analyzer system as defined in §63.7575, or install, certify, operate and maintain CEMS for CO and oxygen according to the following procedures. (Note: the Permittee's boiler is a fuel cell and Table 2 does not provide a CEMS compliance alternative and therefore the CO CEMS requirements do not apply):

- (a) The Permittee must install, operate, and maintain an oxygen analyzer system in accordance with the manufacturer's recommendations, as defined in §63.7575, or install, certify, operate and maintain continuous emission monitoring systems for CO and oxygen (or CO₂) according to the procedures in paragraphs (a)(1) through (6) of §63.7525;
- (b) The CO and oxygen levels shall be monitored at the same location at the outlet of the boiler;
- (c) To demonstrate compliance with the applicable alternative CO CEMS emission standard listed in Table 2, the Permittee must install, certify, operate, and maintain a CO CEMS and an oxygen analyzer according to the applicable procedures under §63.7525. Any boiler that has a CO CEMS that is compliant with Performance Specification 4, 4A, or 4B at 40 CFR 60, Appendix B, a site-specific monitoring plan developed according to §63.7505(d), and the requirements in §63.7540(a)(8) and paragraph (a) of this section must use the CO CEMS to comply with the applicable alternative CO CEMS emission standard listed in Tables 1, 2, or 11 through 13 to Subpart DDDDD:

- (i) The Permittee must conduct a performance evaluation of each CO CEMS according to the requirements in §63.8(e) and according to Performance Specification 4, 4A, or 4B at 40 CFR 60, Appendix B;
 - (ii) During each relative accuracy test run of the CO CEMS, the Permittee must collect emission data for CO concurrently (or within a 30- to 60-minute period) by both the CO CEMS and by Method 10, 10A, or 10B at 40 CFR 60, appendix A-4. The relative accuracy testing must be at representative operating conditions;
 - (iii) The Permittee must follow the quality assurance procedures (e.g., quarterly accuracy determinations and daily calibration drift tests) of Procedure 1 of appendix F to part 60. The measurement span value of the CO CEMS must be two times the applicable CO emission limit, expressed as a concentration;
 - (iv) Any CO CEMS that does not comply with §63.7525(a) cannot be used to meet any requirement in Subpart DDDDD to demonstrate compliance with a CO emission limit listed in Tables 1, 2, or 11 through 13 to Subpart DDDDD; and
 - (v) Complete the initial performance evaluation no later than July 29, 2016.
- (d) Complete a minimum of one cycle of CO and oxygen CEMS operation (sampling, analyzing, and data recording) for each successive 15-minute period. Collect CO and oxygen data concurrently. Collect at least four CO and oxygen CEMS data values representing the four 15-minute periods in an hour, or at least two 15-minute data values during an hour when CEMS calibration, quality assurance, or maintenance activities are being performed;
- (e) Reduce CO CEMS data as specified in §63.8(g)(2). It is to be reduced to 1-hour averages computed from four or more data points equally spaced over each 1-hour period, except during periods when calibration, quality assurance, or maintenance activities pursuant to provisions of this part are being performed. During these periods, a valid hourly average shall consist of at least two data points with each representing a 15-minute period. Alternatively, an arithmetic or integrated 1-hour average of CEMS data may be used;
- (f) Calculate one-hour arithmetic averages, corrected to 3 percent oxygen from each hour of CO CEMS data in parts per million CO concentration. The one-hour arithmetic averages required shall be used to calculate the 30-day or 10-day rolling average emissions. Use Equation 19-19 in section 12.4.1 of Method 19 of 40 CFR 60, appendix A-7 for calculating the average CO concentration from the hourly values;
- (g) For purposes of collecting CO data, operate the CO CEMS as specified in §63.7535(b). The Permittee must use all the data collected during all periods in calculating data averages and assessing compliance, except that the Permittee must exclude certain data as specified in §63.7535(c). Periods when CO data are unavailable may constitute monitoring deviations as specified in §63.7535(d); and
- (h) Operate an oxygen trim system with the oxygen level set no lower than the lowest hourly average oxygen concentration measured during the most recent CO performance test as the operating limit for oxygen according to Table 7 to Subpart DDDDD.

[§63.7525(a), (a)(1), (a)(2), (a)(3), (a)(4), (a)(5), (a)(6), (a)(7); §63.7575 to Subpart DDDDD of 40 CFR 63; §63.8(1)(ii); §63.8(c)(3); §63.8(c)(4)(ii); §63.8(g)(2)]

M21. Site-specific Stack Test Plan

40 CFR 63 Section 7520

This monitoring requirement applies to Requirement 33.

The Permittee must develop a site-specific stack test plan for each performance test according to the requirements in §63.7(c). The site-specific test plan shall be in accordance with requirements in §63.7520(a) and §63.7(c)(2)(i), and shall include a test program summary, the test schedule, data quality objectives, and both an internal and external quality assurance (QA) program in accordance with §63.7(c).

[§63.7(c); §63.7520(a) to Subpart DDDDD of 40 CFR 63]

M22. Site-specific Monitoring Plan

40 CFR 63 Section 7505

This monitoring requirement applies to Requirement 33.

If the Permittee elects to demonstrate compliance with any applicable emission limit through performance testing and subsequent compliance with operating limits (including the use of CPMS), or with a CEMS, or COMS, the Permittee must develop a site-specific monitoring plan according to §63.7505(d). The site-specific monitoring plan must be developed at least 60 days prior to initial evaluation of any CMS. If requested, the site-specific monitoring plan shall be submitted to SWCAA and the Administrator. This requirement to maintain a site-specific monitoring plan would also apply for any alternative monitoring parameters approved for the Permittee under §63.8(f).

[§63.8(f); §63.7505(d) to Subpart DDDDD of 40 CFR 63]

M23. Monitoring Compliance with Operating Limits

40 CFR 63 Section 7515, 7555, Table 4
WAC 173-401-615(1)(b)

This monitoring requirement applies to Requirement 34 and 44.

The Permittee shall continuously monitor the following operating conditions of the Nebraska hog fuel boiler as follows:

- (a) Any operating conditions for which an operating limit from Table 4 to Subpart DDDDD of 40 CFR 63 applies;
- (b) The operational status of the boiler;
- (c) Times and durations of startup, shutdown, standby and transient flame stabilization operation of the boiler;
- (d) The rate and type of fuels combusted;
- (e) For each startup period, for units selecting paragraph (2) of the definition of “startup” in §63.7575 the Permittee must maintain records of the time that clean fuel combustion begins; the time when the Permittee starts feeding fuels that are

not clean fuels; the time when useful thermal energy is first supplied; and the time when the PM controls are engaged (refer to the Startup Shutdown Plan (SSP) prepared by the facility); and

- (f) Both the hourly and 24-hour average overall heat rate to the boiler in terms of MMBtu/hr.

[WAC 173-401-615(1)(b); §63.7555(d)(6), (d)(11) to Subpart DDDDD of 40 CFR 63]

VIII. RECORDKEEPING TERMS AND CONDITIONS

All monitoring records shall be maintained in a readily accessible form for a minimum period of five years. Pursuant to WAC 173-401-530(2)(c), none of the recordkeeping requirements apply to IEUs. The Permittee shall maintain records of required monitoring per M1 through M25 as follows if applicable:

K1. General Recordkeeping

WAC 173-401-615(2)
ADP 17-3248 Section 2.3.23-25, Appendices A-D

Permittee is required to keep the following records:

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

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

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

- (d) Sampling and Emissions Testing
 - (i) The date sampling was performed;
 - (ii) The entity that performed the sampling;
 - (iii) The description of the source including manufacturer, model number and design capacity, and the location of the sample ports or test locations;
 - (iv) The analytical techniques used to take the sample or perform the observation including laboratory data, QA/QC procedures and documentation;
 - (v) The test methods or procedures used, including all field data, QA/QC procedures and documentation;
 - (vi) The operating conditions existing at the time of sampling or measurement;
 - (vii) Summary of production related parameters;
 - (viii) The date analyses were performed;

- (ix) The entity that performed the analyses;
 - (x) Chain of custody information;
 - (xi) The analytical techniques or methods used to perform the analyses;
 - (xii) The results of such analyses;
 - (xiii) Compliance status of each monitored requirement;
 - (xiv) Calibration documentation;
 - (xv) Analyzer response check documentation; and
 - (xvi) Corrective action taken in response to permit deviations and when such action was initiated.
- (e) Maintenance and Repair Activities
- (i) The date, place, and time of activity;
 - (ii) Who made a record of the maintenance or repair;
 - (iii) If a control device or process was not operating during a specific time period, a record must be made to that effect; and
 - (iv) Shall be recorded for each occurrence.

K2. Continuous Emission Data Recordkeeping

WAC 173-401-615(2)
ADP 17-3248 Section 2.3.26, 27

The Permittee shall record and maintain for emission unit EU-3 a file of all measurements, data, reports, and other information required by this permit at the source in a readily accessible form suitable for inspection for at least five (5) years from the date of each record.

A continuous emission monitoring system (CEMS) and data acquisition and handling system (DAHS) shall be installed to monitor emission concentrations and emission rates of opacity, NO_x, CO, and O₂ from the Nebraska hog fuel boiler. The CEMS/DAHS system shall be operated and maintained as described in Appendix B. Minimum data availability shall be 90% or greater.

CEM calibration results, cylinder gas audits results and maintenance and repair activities shall be recorded for each occurrence.

Hourly and 24-hour averages of the following data for the Nebraska hog fuel boiler shall be recorded by the DAHS and kept readily available for on-site inspection:

- (a) NO_x emission concentration (ppmvd @ 7% O₂)
- (b) NO_x emission rate (lb/hr)
- (c) CO emission concentration (ppmvd @ 7% O₂)
- (d) CO emission rate (lb/hr)
- (e) O₂ concentration (dry volume percent)

K3. Boiler Recordkeeping

40 CFR 63 Section 7555, 7560

Required boiler records must be in a form suitable and readily available for expeditious review and must be retained for a minimum of 5 years following the date of each

occurrence, measurement, maintenance, corrective action, report or record. These records include those required in Table 8 to Subpart DDDDD required to show continuous compliance. Boiler records must be kept on-site, or they must be accessible from on-site, for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche. The following compliance records are required for boilers at the facility as specified:

- (a) **Record of Notifications:** A copy of each notification and report submitted to comply with Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report.
- (b) **Record of Performance Tests:** Record of each performance test, fuel analyses, or other compliance demonstrations and performance evaluations. If the Permittee chooses to performance test less frequently than annually, records documenting that the previous performance test(s) were less than 75% of the applicable limit and documenting that there was no change in source operations including fuel composition and operation of air pollution control equipment must be kept.
- (c) **CMS Records:** For each CEMS, COMS, and continuous monitoring system, records for the following:
 - (i) All required measurements needed to demonstrate compliance with the relevant standard including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, and raw performance evaluation measurements, that support data that the source is required to report;
 - (ii) All results of performance tests, CMS performance evaluations, and opacity and visible emission observations;
 - (iii) All measurements as may be necessary to determine the conditions of performance tests and performance evaluations;
 - (iv) All CMS calibration checks;
 - (v) All adjustments and maintenance performed on CMS;
 - (vi) Each period during which a required CMS is malfunctioning or inoperative (including out-of-control periods);
 - (vii) Additional records for required CMS specified in §63.10(c), except that §63.10(c)(2)-(4) and (9) are reserved;
 - (viii) COMS monitoring data recorded during any required performance test or evaluation;
 - (ix) Previous (i.e., superseded) versions of any CMS performance evaluation plan. If a CMS performance evaluation plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the performance evaluation plan on record to be made available for inspection, upon request, by the Administrator, for a period of 5 years after each revision to the plan;
 - (x) Any request for alternatives to relative accuracy test for CEMS as provided for in §63.8(f)(6)(i); and
 - (xi) If the Permittee chooses to rely on paragraph (2) of the definition of “startup” in §63.7575, for each startup period, records must be maintained

- of the hourly steam temperature, hourly steam pressure, hourly steam flow, hourly flue gas temperature, and all hourly average CMS data (e.g., CEMS, COMS, ESP total secondary electric power input) collected during each startup period. In addition, if compliance with the PM emission limit is demonstrated using a PM control device, maintain records as specified in §63.7555(d)(12)(i) through (iii), which includes: For a boiler or process heater with an electrostatic precipitator, record the number of fields in service, as well as each field's secondary voltage and secondary current during each hour of startup.
- (d) **Permit Deviation Records:** Record of the date and time that each deviation from Subpart DDDDD requirements started and stopped.
- (e) **Operating Records for the Nebraska hog fuel boiler:**
- (i) Records of monthly fuel, type and amount, used by the boiler;
 - (ii) If fuel analysis is used for demonstrating compliance with any limit, 12-month rolling average chloride and mercury content of the fuels used;
 - (iii) Percent oxygen content of flue gas reduced to 30-day rolling averages. This requirement does not apply to units that install an oxygen trim system; or
 - (iv) If an oxygen trim system is used, record of the percent oxygen level set point programmed in the trim system;
 - (v) Record of the occurrence and duration of each malfunction of any boiler, or of the associated air pollution control and monitoring equipment;
 - (vi) Record of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions including corrective actions to restore a malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation;
 - (vii) Records of all required maintenance performed on the air pollution control and monitoring equipment;
 - (viii) Record of the calendar date, time, occurrence and duration of each startup and shutdown; and
 - (ix) Record of the type(s) and amount(s) of fuels used during each startup and shutdown.
- (f) **Record of Fuel Input:**
- (i) For sources that demonstrate compliance through performance testing, a copy of all calculations and supporting documentation of maximum chlorine, mercury and TSM fuel input using the specific equations listed in §63.7530, that were done to demonstrate continuous compliance with the emission limits; and
 - (ii) For sources that demonstrate compliance through fuel analysis, a copy of all calculations and supporting documentation of HCl, mercury, and TSM emission rates, using specific equations listed in §63.7530, that were done to demonstrate compliance with the emission limits.
- (g) **Record of Efficiency Credit Usage:** If the Permittee elects to use efficiency credits from energy conservation measures to demonstrate compliance according to §63.7533, the Permittee shall maintain the records specified in §63.7555(f).

[WAC 173-401-615(1)(a); §63.10(b)(2)(vii)-(xi); §63.6(h)(7)(i) and (ii); §63.6(h)(7)(i); §63.8(d)(3); §63.8(f)(6)(i); §63.10(b)(1), (b)(2)(vii)-(xi); §63.7533; §63.7555(a)(1), (a)(2), (b), (b)(3), (b)(4), (b)(5), (d)(1), (d)(3), (d)(4), (d)(5), (d)(6), (d)(7), (d)(8), (d)(9), (d)(10), (d)(12), (f); §63.7560; Table 7 and Table 8 to Subpart DDDDD of 40 CFR 63]

IX. REPORTING TERMS AND CONDITIONS

All required reports must be certified by a responsible official consistent with WAC 173-401-520. Where an applicable requirement requires reporting more frequently than once every six months, the responsible official's certification need only be submitted once every six months, covering all required reporting since the date of the last certification.

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

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

Part 70 Air Operating Permits
U.S. EPA Region 10, Mail Stop: OAW-150
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

R1. Deviations from Permit Conditions

WAC 173-401-615(3)(b)
SWCAA 400-107 (Local)

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

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

Excess emissions shall be reported as soon as possible. In accordance with SWCAA 400-107(1), excess emissions that the Permittee wishes to be considered unavoidable must be reported as soon as possible, but no later than 48 hours after discovery. The Permittee shall report the upset condition by telephone, e-mail or facsimile as initial notification to SWCAA; a message may be left on the answering machine for conditions outside of normal business hours.

R2. Complaint Reports

WAC 173-401-615(3)

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

R3. Semiannual ReportsWAC 173-401-615(3)
ADP 17-3248 Section 2.5.42

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

- (a) Records of all required monitoring, and any deviation from permit requirements shall be clearly identified;
- (b) For all EPA Method 9 or SWCAA Method 9 monitoring conducted during the semiannual period, a copy of the relevant opacity certification(s) shall be submitted with the semiannual report;
- (c) Hours of operation of the Nebraska hog fuel boiler;
- (d) Cold startup periods for the Nebraska hog fuel boiler;
- (e) Amount of ammonia consumed;
- (f) Amount, species, average temperature set point and average final moisture of lumber dried in the dry kilns;
- (g) Hours of operation for the Carothers and Son baghouse;
- (h) Amount and type of anti-stain consumed;
- (i) Amount and type of wood byproducts transferred from the facility;
- (j) Hourly and daily (24-hr) CEMS data for:
 - (i) NO_x emission concentration (ppmvd @ 7% O₂)
 - (ii) NO_x emission rate (lb/hr)
 - (iii) CO emission concentration (ppmvd @ 7% O₂)
 - (iv) CO emission rate (lb/hr)
 - (v) O₂ concentration (% O₂)
- (k) Opacity exceedance reports;
- (l) The results of all daily CEMS calibrations and quarterly cylinder gas audits;
- (m) Certification that all required equipment is installed;
- (n) Certification that only clean, wood products are combusted in the Nebraska hog fuel boiler;
- (o) Summary of facilitywide air pollutant emissions; and
- (p) All required reports must be certified by a responsible official consistent with WAC 173-401-520. The responsible official is identified on Page 1 of the Statement of Basis. The reports shall be either certified at initial submittal or each shall be delineated and certified in the subsequent semiannual report.

R4. Annual ReportsWAC 173-401-630(5)
ADP 17-3248 Section 2.5.43

- (a) Annual Compliance Certification:
The Permittee shall submit to SWCAA and EPA a certification of compliance with all terms and conditions of this permit in accordance with WAC 173-401-630(5)(d). The Permittee shall report the following to SWCAA annually by March 15th for the previous calendar year:
 - (i) Identification of each term or condition of the permit that is the basis of the certification;

- (ii) Statement of compliance status;
 - (iii) Whether compliance was continuous or intermittent;
 - (iv) Method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with WAC 173-401-615;
 - (v) Such other facts as SWCAA may require to determine the compliance status of the source; and
 - (vi) Such additional requirements as may be specified pursuant to Sections 114(a)(3) and 504(b) of the FCAA.
- (b) Annual Reports:
The Permittee shall report the following to SWCAA annually by December 31st:
- (i) The annual grate cleaning schedule for the Nebraska hog fuel boiler for the upcoming year.

R5. Emission Inventory Reports

SWCAA 400-105
ADP 17-3248 Section 2.5.37

The Permittee shall submit an inventory of annual emissions from the source to SWCAA by March 15th for previous calendar year in accordance with SWCAA 400-105. The inventory shall include stack and fugitive emissions of NO_x, SO₂, CO, VOC, PM, and toxic air pollutants identified in WAC 173-460 (effective date 2/14/1994).

R6. Source Test Reports and RATA Reports

WAC 173-401-615(3)
SWCAA 400-106
ADP 17-3248 Section 2.5.44, Appendices A, B, C, D

- (a) Source Test Reports of all required source or emissions testing shall be submitted to the Agency within 45 days of test completion. Each report shall include:
- (i) A description of the source including manufacturer, model number and design capacity of the equipment, and the location of the sample ports or test locations;
 - (ii) Time and date of the test and identification and qualifications of the personnel involved;
 - (iii) A summary of results, reported in units and averaging periods consistent with the applicable emission standard or limit with correction to the appropriate O₂ standard;
 - (iv) A summary of control system or equipment operating conditions;
 - (v) A summary of production related parameters;
 - (vi) A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation;
 - (vii) A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation;
 - (viii) Copies of field data and example calculations;
 - (ix) Chain of custody information;
 - (x) Calibration documentation;
 - (xi) Discussion of any abnormalities associated with the results;
 - (xii) A statement signed by the senior management official of the testing firm certifying the validity of the source test report; and

(xiii) An electronic copy of the test report shall be provided to SWCAA.

- (b) Relative accuracy test audit reports shall be submitted to SWCAA within 45 days of test completion. An electronic copy of the test/RATA report shall be provided to SWCAA.

R7. Monthly Records ADP 08-2799R1 Section 2.5.38

The Permittee shall submit monthly the 12-month rolling total in tons for NO_x and CO from the Nebraska hog fuel boiler.

R8. MACT Records – Plywood MACT (Subpart DDDD) 40 CFR 63.46011

The Permittee shall submit an initial notification of applicability as required by 40 CFR 63.9. This notification was submitted March 19, 2008.

R9. MACT Records – Boiler MACT (Subpart DDDDD) 40 CFR 63.7545

A. **Notifications:** The following notifications must be submitted to the Administrator by the dates specified:

- (a) **Initial Notifications:** The Permittee must submit to the Administrator an initial notification when a boiler becomes subject to 40 CFR 63 Subpart DDDDD in accordance with §63.9(b), postmarked or delivered within 15 calendar days from the date of actual startup of the boiler. This notification was submitted September 13, 2011;
- (b) **Notification of Compliance Status.** The Permittee must submit to the Administrator a Notification of Compliance Status for the boiler in accordance with §63.9(h)(2)(ii) and §63.7545(e), including all performance test results and fuel analyses. The Initial Compliance Status Report shall be submitted before the close of business on the 60th day following the completion of all performance tests and/or other initial compliance demonstrations for the boiler. The Permittee must include with the Notification of Compliance Status the information specified at §63.7545(e), as applicable, and a signed certification that the energy assessment was completed according to Table 3 to Subpart DDDDD and is an accurate depiction of the facility at the time of the assessment, or that the maximum number of on-site technical hours specified in the definition of energy assessment applicable to the facility has been expended;
- (c) **Washington State Assessment and Reporting Requirements:** By January 31, 2018, the Permittee must submit nonproprietary information reported in the energy assessment electronically to SWCAA and must also submit a report to the Washington State University extension energy program that identifies, if applicable, the economic, technical and other barriers to implementing thermal efficiency opportunities identified in the energy assessment. In accordance with RCW 70.94.992;
- (d) **Submission of a CMS site-specific performance evaluation test plan.** If requested, the Permittee must submit to the Administrator for approval any CMS site-specific monitoring plan at least 60 calendar days before the initial CMS performance evaluation is scheduled to begin, or on a mutually agreed upon date;

- (e) **Notification of fuel changes and modifications.** The Permittee must provide notice of the date of any fuel change or physical changes in any boiler that results in the applicability of a different subcategory under Subpart DDDDD to the boiler within 30 days of the switch/change. The notification must identify the owner or operator and location of the source, the boiler that switched fuels or was physically changed, the date of the notice, the currently applicable subcategory and the date upon which the fuel switch or physical change occurred; and
- (f) **Notification of intent to conduct a performance test.** The Permittee must submit a notification of intent to conduct a performance test at least 60 days before the performance test is scheduled to begin.

[RCW 70.94.992; WAC 173-401-615(1)(a); §64.7(d); §63.7505(d)(1); §63.7530(e); §63.7530(f); §63.7545(a), (b), (d), (e), (h) to Subpart DDDDD of 40 CFR 63]

B. Compliance Reports. The Permittee must submit compliance reports for the boilers, including each report in Table 9 of Subpart DDDDD, as follows:

- (a) The initial semiannual compliance report must be postmarked or submitted no later than January 31, 2017 and must cover the period beginning on January 31, 2016 and ending July 31, 2016;
- (b) Each subsequent semiannual compliance report must cover the reporting period from January 1 through June 30 or the reporting period from July 1 through December 31. Annual, biennial, and 5-year compliance reports must cover the applicable 1-, 2-, or 5-year periods from January 1 to December 31;
- (c) Each subsequent semiannual compliance report must be postmarked or submitted no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period. Annual, biennial, and 5-year compliance reports must be postmarked or submitted no later than January 31;
- (d) Compliance reports must contain the following information depending on how the Permittee chooses to comply:
 - (i) Company and Facility name and address;
 - (ii) Boiler identification, emissions limitations, and operating parameter limitations;
 - (iii) Date of report and beginning and ending dates of the reporting period;
 - (iv) The total operating time during the reporting period;
 - (v) If a CMS is used for compliance monitoring, including CEMS, COMS, or CPMS, include the monitoring equipment manufacturer(s) and model numbers and the date of the last CMS certification or audit;
 - (vi) The total fuel use by each individual boiler within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by the EPA or the Permittee's basis for concluding that the fuel is not a waste, and the total fuel usage amount with units of measure;
 - (vii) If the Permittee is conducting performance tests once every 3 years consistent with §63.7515(b) or (c), the date of the last 2 performance tests and a statement as to whether there have been any operational changes since the last performance test that could increase emissions; and

- (viii) A statement indicating that no new types of fuel were burned, or if a new type of fuel was burned since the last performance test for any boiler, the following must be included:
 - a) Submit the calculation of chlorine input, using Equation 7 of §63.7530 demonstrating that the boiler is still within its maximum chlorine input level established during the previous performance testing (for sources that demonstrate compliance through performance testing), or submit the calculation of HCl emission rate using Equation 12 of §63.7530 demonstrating that the boiler is still meeting the emission limit for HCl emissions (for boilers that demonstrate compliance through fuel analysis).
 - b) Submit the calculation of mercury input, using Equation 8 of §63.7530 demonstrating that the boiler is still within its maximum mercury input level established during the previous performance testing (for sources that demonstrate compliance through performance testing), or submit the calculation of mercury emission rate using Equation 13 of §63.7530 demonstrating that the boiler is still meeting the emission limit for mercury emissions (for boilers that demonstrate compliance through fuel analysis).
 - c) If complying with the TSM emission limit, submit the calculation of TSM input, using Equation 9 of §63.7530 demonstrating the boiler is still within its maximum TSM input level established during the previous performance testing (for sources that demonstrate compliance through performance testing), or submit the calculation of TSM emission rate, using Equation 14 of §63.7530 demonstrating that the boiler is still meeting the emission limit for TSM emissions (for boilers that demonstrate compliance through fuel analysis).
- (e) If the Permittee plans to burn a new type of fuel in an individual boiler and cannot demonstrate compliance with the maximum chlorine input operating limit using Equation 7 of §63.7530 or the maximum mercury input operating limit using Equation 8 of §63.7530, or the maximum TSM input operating limit using Equation 9 of §63.7530, include in the compliance report a statement indicating the intent to conduct a new performance test within 60 days of starting to burn the new fuel;
- (f) A summary of any monthly fuel analyses or fuel specification analyses conducted to demonstrate compliance;
- (g) If there were no deviations from any applicable emission limits or operating limits for the boiler, a statement that there were no deviations from the applicable emission limits or operating limits during the reporting period;
- (h) If there were no deviations from the monitoring requirements including no periods during which the CMSs, including CEMS, COMS, and CPMS, were out of control as specified in §63.8(c)(7), a statement that there were no deviations and no periods during which the CMS were out of control during the reporting period;
- (i) If a malfunction occurred during the reporting period, the report must include the number, duration, and a brief description for each type of malfunction and

- whether the malfunction caused or may have caused any applicable emission limitation to be exceeded;
- (j) A description of actions taken during a malfunction of a boiler or associated air pollution control device or CMS to minimize emissions, including actions taken to correct the malfunction;
 - (k) The date of the most recent tune-up for the boiler;
 - (l) For each reporting period, the compliance reports must include all of the calculated 30 day rolling average values based on the daily CEMS;
 - (m) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - (n) For each instance of startup or shutdown include the information required to be monitored, collected, or recorded according to the requirements of §63.7555(d);
 - (o) For each deviation from an emission limit or operating limit that occurs at an individual boiler not using a CMS to comply with that emission limit or operating limit, or from the work practice standards for periods of startup and shutdown, the compliance report must additionally contain:
 - (i) A description of the deviation and which emission limit or operating limit or work practice standard from which was deviated;
 - (ii) Information on the number, duration, and cause of deviations (including unknown cause), as applicable, and the corrective actions taken; and
 - (iii) If the deviation occurred during an annual performance test, provide the date the annual performance test was completed.
 - (p) For each deviation from an emission limit, operating limit, and monitoring requirement by an individual boiler using a CMS to comply with that emission limit or operating limit, the compliance report must additionally contain:
 - (i) The date and time that each deviation started and stopped and description of the nature of the deviation;
 - (ii) The date and time each CMS was inoperative, except for zero (low-level) and high-level checks;
 - (iii) The date, time, and duration each CMS was out of control, including the information in §63.8(c)(8);
 - (iv) The date and time that each deviation started and stopped.
 - (v) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period;
 - (vi) A characterization of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes;
 - (vii) A summary of the total duration of downtime for each CMS during the reporting period and the total duration of CMS downtime as a percent of the total source operating time during that reporting period;
 - (viii) A brief description of the source for which there was a deviation; and
 - (ix) A description of any changes in CMSs, processes, or controls since the last reporting period for the source for which there was a deviation.

[WAC 173-401-615(1)(a); §63.7550(a)-(e) to Subpart DDDDD of 40 CFR 63]

C. **Electronic Reporting.** All reports required by Table 9 of Subpart DDDDD must be submitted electronically to the EPA via the CEDRI. (CEDRI can be accessed through the

EPA's CDX.) The appropriate electronic report in CEDRI for Subpart DDDDD must be used. Instead of using the electronic report in CEDRI for Subpart DDDDD, the Permittee may submit an alternate electronic file consistent with the extensible markup language (XML) schema listed on the CEDRI Web site (<http://www.epa.gov/ttn/chief/cedri/index.html>), once the XML schema is available. If the reporting form specific to Subpart DDDDD is not available in CEDRI at the time that the report is due, the Permittee must submit the report to the Administrator at the appropriate address listed in §63.13. The Permittee must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI.

- (a) **Test Reports.** The Permittee must electronically submit the results of the performance tests, including any associated fuel analyses, using test methods supported by the EPA's Electronic Reporting Tool (ERT) as listed on the EPA's ERT Web site (<http://www.epa.gov/ttn/chief/ert/index.html>) within 60 days after the date of completing each performance test. Performance test data must be submitted in a file format generated through the use of EPA's ERT or an electronic file format consistent with the XML schema listed on the EPA's ERT Web site. If the Permittee claims that some of the performance test data being submitted is confidential business information (CBI), the Permittee must submit a complete file generated through the use of the EPA's ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT Web site, including information claimed to be CBI, on a compact disc, flash drive, or other commonly used electronic storage media to the EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAPS/CORE CBI Office, Attention: Group Leader, Measurement Policy, Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT or alternate file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described above. Also, for data collected using test methods that are not supported by the EPA's ERT as listed on the EPA's ERT Web site at the time of the test, the Permittee must submit the results of the performance tests at the appropriate address listed in §63.13;
- (b) **Relative Accuracy Test Audit (RATA) Data.** The Permittee must electronically submit the results of the performance evaluations for the continuous monitoring systems measuring relative accuracy test audit (RATA) pollutants that are supported by the EPA's ERT, to the EPA via the CEDRI (CEDRI can be accessed through the EPA's CDX) within 60 days after the date of completing each CEMS performance evaluation. Performance evaluation data must be submitted in a file format generated through the use of the EPA's ERT or an alternate file format consistent with the XML schema listed on the EPA's ERT Web site. If the Permittee claims that some of the performance evaluation information being transmitted is CBI, the Permittee must submit a complete file generated through the use of the EPA's ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT Web site, including information claimed to be CBI, on a compact disc, flash drive, or other commonly used electronic storage media to the EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAPQS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT or alternate file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described above. Also, for any performance

evaluations of continuous monitoring systems measuring RATA pollutants that are not supported by the EPA's ERT as listed on the ERT Web site at the time of the evaluation, you must submit the results of the performance evaluation at the appropriate address listed in §63.13; and

- (c) **Compliance Reports.** The Permittee must submit Compliance Reports required by Table 9 of Subpart DDDDD electronically using CEDRI. However, if a specific reporting form is not available in CEDRI at the time that the report is due the report the Permittee must submit the report to the Administrator at the appropriate address listed in §63.13. At the discretion of the Administrator, the Permittee must also submit these reports, to the Administrator in the format specified by the Administrator.

[WAC 173-401-615(I)(a); §63.7515(f); §63.7540(b); §63.7550(h) to Subpart DDDDD of 40 CFR 63]

X. NON-APPLICABLE REQUIREMENTS

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

1. Standards of Performance for Incinerators (Subpart E) 40 CFR 60.50 et seq.

Subpart E applies to all incinerators with charging rates greater than 50 tons per day which commenced construction or modification after August 17, 1971. Pursuant to 40 CFR 60.51(a), an incinerator is defined as any "...furnace used in the process of burning solid waste for the purpose of reducing the volume of the waste by removing combustible matter." The hog fuel boiler at this source has a charging rate greater than 50 tons per day, but its primary purpose is the production of process steam not the reduction of waste volume. Therefore, this requirement is not applicable.

2. Compliance Assurance Monitoring 40 CFR 64

Part 64 applies to certain pollutant-specific emissions units at major sources. In general, Part 64 applies to emission units that utilize a control device to achieve compliance with an emission limit for a pollutant that otherwise could be emitted at a rate exceeding the applicable major source threshold (e.g. 100 tpy criteria pollutants and VOCs, 10 tpy individual HAP). Particulate matter from the hog fuel boiler could exceed 100 tpy without the additional control of the ESP, therefore, only particulate matter from this boiler is potentially subject to CAM. However, 40 CFR 64.2(b)(1)(i) exempts these emission limitations from the requirements of Part 64 because the facility is subject to a post-1990 NESHAPs (Boiler MACT)... [that establishes PM limits and monitoring.] It is expected that the standards in the Boiler MACT will provide a reasonable assurance of compliance.

3. Emission Standards for Combustion and Incineration Units SWCAA 400-050(2)

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

4. Registration Program SWCAA 400-100(2)

The Permittee is an air operating permit source. Pursuant to SWCAA 400-100(3)(a)(iv) air operating permit sources are exempt from the registration requirements of SWCAA 400-100(2).

5. Solid Waste Incinerator Facilities

WAC 173-434

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

6. Portions of the Boiler MACT

40 CFR Part 63 Subpart DDDDD

The facility is not required to perform a fuel analyses because the facility burns a single type of fuel under §63.7510 paragraphs (a)(2)(i).

The Permittee's boiler is a fuel cell and Table 2 does not provide a CEMS compliance alternative; therefore, the CO CEMS requirements do not apply to this boiler. SWCAA ADP 17-3248 does require a CO CEMS and has specific requirements that apply separately from the Boiler MACT.

The Initial Compliance Demonstration has been fulfilled. The initial tune-up of the Nebraska hog fuel boiler was completed January 27, 2015 and the one-time energy assessment was completed January 27, 2015.

The Permittee has demonstrated initial compliance as required under §63.7530 and Tables 5 and 7 by:

- (a) If the Permittee chooses to demonstrate compliance through performance stack testing, then conduct the initial performance tests according to §63.7520 and Table 5 by July 29, 2016;
- (b) Establishing operating limits according to §63.7530 and Table 7;
- (c) If compliance is demonstrated through performance stack testing, the Permittee must establish each site-specific operating limit in Table 4 that applies according to the requirements in §63.7520, Table 7 to Subpart DDDDD, and paragraph (b)(4) of §63.7530, as applicable;
- (d) Conducting CMS performance evaluations according to §63.7525;
- (e) For an ESP, if the Permittee chooses to use a PM continuous parameter monitoring system (CPMS), the Permittee must establish the PM CPMS operation limit and determine compliance according to §63.7530;
- (f) If the Permittee conducts multiple performance tests, the Permittee must set the minimum oxygen level at the lower of the minimum values established during the performance tests; and
- (g) Installing, operating, and maintaining all applicable CMS (including CEMS, COMS, and CPMS) according to §63.7525.
[§63.7510(a)(1), (a)(2), (a)(3), (a)(4), (b), (c), (d), (e); §63.7520(c); §63.7525; §63.7530(a), (b)(4), (b)(4)(ii), (b)(4)(viii); Table 5 to Subpart DDDDD of 40 CFR 63; §63.7]

APPENDIX A

Emission Testing Requirements – Nebraska boiler

1. Introduction:

The purpose of this testing is to quantify emissions from the Nebraska boiler, and demonstrate compliance with the requirements of this Permit and applicable air quality regulations.

2. Testing Requirements:

- a. **Test plan.** A comprehensive test plan shall be submitted to SWCAA for review and approval at least ten business days prior to each test. SWCAA personnel shall be informed at least five business days prior to testing so that a representative may be present during testing.
- b. **Testing schedule.** Initial testing was completed on April 9, 2008. Emission testing shall be conducted every two years, no later than the end of April.
- c. **Test runs/Reference test methods.** A minimum of three test runs shall be performed for each constituent listed below to ensure the data are representative. Compliance shall be demonstrated by averaging the results of the individual sampling runs. The sampling methods and schedules shall be used unless alternate methods are approved in writing by SWCAA in advance of the emission testing.

<u>Constituent</u>	<u>Reference Test Method</u>	<u>Minimum Test Run Duration</u>
Flow rate, temperature	EPA Methods 1 and 2	N/A
O ₂ , CO ₂ content	EPA Method 3 or 3A	60 minutes
Moisture content	EPA Method 4	60 minutes
PM (filterable)	EPA Method 5	60 minutes
PM (condensable)	EPA Method 202	60 minutes
NO _x	EPA Method 7E	60 minutes
CO	EPA Method 10	60 minutes
Ammonia (NH ₃)	BAAQMD ST-1B	30 minutes
VOC (initial test only)	EPA Method 25A	60 minutes
SO ₂ (initial test only)	EPA Method 6C	60 minutes
Opacity	SWCAA Method 9	6 minutes

3. Source Operation:

- a. **Source operations.** Source operations during the emission test must be representative of maximum intended operating conditions.
- b. **Record of production parameters.** Production related parameters and equipment operating conditions shall be recorded during emission testing for each run to correlate operating conditions with emissions. Recorded parameters shall, at a minimum, include:

APPENDIX A**Emission Testing Requirements – Nebraska boiler****3. Source Operation: (cont.)**

- 1) Boiler steam production rate (lb/hr steam),
- 2) Boiler firing rate (MMBtu/hr),
- 3) Ammonia injection rate (gal/hr),
- 4) Fuel type/mixture description,
- 5) Process startups and shutdowns, and
- 6) Plant adjustments.

4. Reporting Requirements:

- a. A final emission test report shall be prepared and submitted to SWCAA within 45 calendar days of test completion and, at a minimum, shall contain the following information:
 - 1) Description of the source including manufacturer, model number and design capacity of the equipment, the location of the sample ports or test locations, and stack parameters,
 - 2) Time and date of the test and identification and qualifications of the personnel involved,
 - 3) Summary of results, reported in units and averaging periods consistent with the applicable emissions standard or unit,
 - 4) Summary of control system or equipment operating conditions,
 - 5) Summary of production related parameters,
 - 6) A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation,
 - 7) A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation,
 - 8) Copies of field data and example calculations,
 - 9) Chain of custody information,
 - 10) Calibration documentation,
 - 11) Discussion of any abnormalities associated with the results,
 - 12) A statement signed by the senior management official of the testing firm certifying the validity of the source test report, and
 - 13) An electronic copy of the test report shall be provided to SWCAA.
- b. All test results shall be corrected to 7% oxygen.

APPENDIX B

Emission Testing Requirements – Lumber Drying

1. **Introduction:**

The purpose of this testing is to quantify emissions from lumber drying operations described in this Permit.

2. **Testing Requirements:**

- a. **Testing schedule.** Emission testing of the lumber drying process shall be conducted within one year after achieving maximum intended operation. The kilns began operation on September 15, 2008. The last emission testing was performed May 7, 2013 for Douglas fir. Subsequent emission testing shall be conducted on a five-year cycle, no later than the end of the calendar month in which the initial emission test was performed. Unless otherwise directed by SWCAA, the testing shall be conducted on the dominant species dried at the facility.
- b. **Test plan.** A comprehensive test plan shall be submitted to SWCAA for review and approval at least ten business days prior to each test. SWCAA personnel shall be informed at least five business days prior to testing so that a representative may be present during testing.
- c. **Test runs/Reference test methods.** The sampling methods identified below shall be used unless alternate methods are approved in writing by SWCAA in advance of the emission testing.

<u>Constituent</u>	<u>Reference Test Method</u>	<u>Minimum Test¹ Run Duration</u>
Exhaust Flow	EPA Methods 1-4	N/A
Volatile organic compounds ²	EPA Method 25A / 18 or 320	N/A
Methanol	NCASI Method 105	N/A
Ethanol	NCASI Method 105	N/A
Formaldehyde	NCASI Method 105	N/A
Acetaldehyde	NCASI Method 105	N/A
Acrolein	NCASI Method 105	N/A
Propionaldehyde	NCASI Method 105	N/A
Acetic Acid	NCASI Method 105 ³	N/A
Mono Turpenes	EPA Method 18	N/A

¹ Test duration will be as necessary to yield representative results. In some cases, multiple test runs will be conducted over the drying cycle.

² The purpose of the testing is to quantify actual VOC emissions. This might involve developing an appropriate scaling factor for Method 25A results, or quantifying the individual components of the kiln exhaust without performing Method 25A.

³ Acetic acid may be collected in the NCASI Method 105 impinger train and analyzed by HPLC.

APPENDIX B**Emission Testing Requirements – Lumber Drying****3. Kiln Operation:**

a. **Quality assurance.** The following quality assurance measures must be met unless otherwise approved by SWCAA in advance of the testing:

- (1) The lumber used for the source test must be preserved in a manner to assure the freshness of the lumber. The lumber must be wrapped in plastic wrap or some other material to prevent off-gassing and contamination during storage and shipment;
- (2) The log(s) from which lumber is taken should be newly arrived at the lumber yard;
- (3) The lumber must be maintained below 45°F if the lumber is stored for more than two but less than seven days prior to the commencement of testing;
- (4) The lumber must be maintained below 10°F if stored for seven or more days prior to testing.
- (5) The ends of each test board must be trimmed prior to testing;
- (6) The kiln must be operated as close as practical to the dominant drying schedule (dry bulb and wet bulb temperatures) at the subject facility for the wood species being tested; and
- (7) The wood samples must be dried to a moisture content at or below the moisture content targeted by the subject facility.

b. **Record of testing parameters.** Production related parameters and equipment operating conditions must be recorded during emissions testing to correlate operating conditions with emissions. Recorded parameters must include the following if reasonably attainable:

- (1) Testing kiln details including: kiln dimensions, kiln air velocity, and heating method;
- (2) Sample size (board feet), sample weight, and lumber size (2" x 4", 4" x 8", etc.);
- (3) Drying time;
- (4) Wood moisture content (initial and final);
- (5) Temperature (continuously monitored and recorded wet bulb and dry bulb temperatures);
- (6) Lumber information including: percentage of heartwood vs. sapwood, ring count, percentage of face area that consists of knots, etc.;
- (7) Tree information: coastal or inland tree, tree age, approximate date harvested, if log was stored in fresh or salt water, etc.; and
- (8) Any interruptions in kiln operation.

All recorded production parameters must be documented in the test results report.

4. Reporting Requirements:

a. A final emission test report must be prepared and submitted to SWCAA within 45 calendar days of test completion. Each report must be provided in an electronic format acceptable to SWCAA and as a hard (paper) copy. Each report shall include:

- (1) Description of the source including manufacturer, model number and design capacity of the equipment, and the location of the sample ports or test locations;
- (2) Time and date of the test and identification and qualifications of the personnel involved;

APPENDIX B**Emission Testing Requirements – Lumber Drying****4. Reporting Requirements: (cont.)**

- (3) Summary of results, reported in units and averaging periods consistent with the applicable emissions standard or unit including but not limited to: lb/Mbf.
 - (4) Summary of control system or equipment operating conditions;
 - (5) Summary of production related parameters;
 - (6) A description of the test methods or procedures used, including all field data, quality assurance/quality control procedures and documentation;
 - (7) A description of the analytical procedures used, including all laboratory data, quality assurance/quality control procedures and documentation;
 - (8) Copies of field data and example calculations;
 - (9) Chain of custody information;
 - (10) Calibration documentation;
 - (11) Discussion of any abnormalities associated with the results; and
 - (12) A statement signed by the senior management official of the testing firm certifying the validity of the source test report.
- b. VOC emissions must be reported in pounds per thousand board feet (lb/Mbf) as VOC. Emissions of each VOC species quantified during the test must be reported in units of lb/Mbf as the individual species. For the purposes of reporting total VOC emissions, the unspciated fraction of the VOC emissions must be assumed to be monoterpenes (C₁₀H₁₆).

APPENDIX C

Emission Testing Requirements – Carothers and Son Baghouse**1. Introduction:**

The purpose of this testing is to quantify emissions from this baghouse and to demonstrate compliance with the requirements of this Permit and applicable air quality regulations.

2. Testing Requirements:

- a. **Test plan.** A comprehensive test plan shall be submitted to SWCAA for review and approval at least ten business days prior to each test. SWCAA personnel shall be informed at least five business days prior to testing so that a representative may be present during testing.
- b. **Testing schedule.** Initial testing was completed on December 19, 2006. Emission testing shall be conducted every ten years thereafter, no later than the end of December.
- c. **Test runs/Reference test methods.** A minimum of three (3) test runs at maximum operating conditions for a minimum of one hour shall be performed for each constituent listed below to ensure the data are representative. Compliance shall be demonstrated by averaging the results of the individual sampling runs. The sampling methods and schedules shall be used unless alternate methods/schedules are approved in writing by SWCAA in advance of the emission testing.

<u>Constituent</u>	<u>Reference Test Method</u>	<u>Minimum Test Run Duration</u>
PM (filterable)	EPA Method 5	60 minutes
Opacity	SWCAA Method 9	15 minutes

3. Source Operation:

- a. **Source operations.** Source operations during the emissions test must be representative of maximum intended operating conditions.
- b. **Record of production parameters.** Production related parameters and equipment operating conditions shall be recorded during emissions testing to correlate operating conditions with emissions. Recorded parameters shall, at a minimum, include process startups and shutdowns, baghouse pressure drop and plant adjustments. All recorded production parameters shall be documented in the test results report.

4. Reporting Requirements:

- a. A final emission test report shall be prepared and submitted to SWCAA within 45 calendar days of test completion and, at a minimum, shall contain the following information:
 - (1) Description of the source including manufacturer, model number and design capacity of the equipment, and the location of the sample ports or test locations,
 - (2) Time and date of the test and identification and qualifications of the personnel involved,

APPENDIX C**Emission Testing Requirements – Carothers and Son Baghouse****4. Reporting Requirements: (cont.)**

- (3) Summary of results, reported in units and averaging periods consistent with the application emissions standard or unit,
 - (4) Summary of control system or equipment operating conditions,
 - (5) Summary of production related parameters,
 - (6) A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation,
 - (7) A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation,
 - (8) Copies of field data and example calculations,
 - (9) Chain of custody information,
 - (10) Calibration documentation,
 - (11) Discussion of any abnormalities associated with the results,
 - (12) A statement signed by the senior management official of the testing firm certifying the validity of the source test report, and
 - (13) An electronic copy of the test report shall be provided to SWCAA.
- b. Results must be reported as measured with no O₂ correction.

APPENDIX D**Continuous Emission Monitoring Requirements – Nebraska boiler****1. Introduction:**

- a. The purpose of installing and maintaining continuous emissions monitoring systems (CEMS) for NO_x, O₂, and CO is to demonstrate compliance with the requirements of this Air Discharge Permit.

2. Requirements:

- a. **CO, NO_x and O₂ CEMS.** The Permittee shall install and maintain a system for monitoring the concentration and emission rate of CO, NO_x, and O₂ from the hog fuel boiler exhaust stack in accordance with the requirements and specifications found in the following regulations:
 - 40 CFR 60, Appendix B - Performance Specification 2 "Specifications and Test Procedures for Sulfur Dioxide and Nitrogen Oxides Continuous Emission Monitoring Systems in Stationary Sources."
 - 40 CFR 60, Appendix B - Performance Specification 3 "Specifications and Test Procedures for Oxygen and Carbon Dioxide Continuous Emission Monitoring Systems in Stationary Sources."
 - 40 CFR 60, Appendix B - Performance Specification 4A "Specifications and Test Procedures for Carbon Monoxide Continuous Emission Monitoring Systems in Stationary Sources."
 - 40 CFR 60, Appendix F - Procedure 3 "Quality Assurance Procedures."

Relative Accuracy Test Audits (RATAs) shall be conducted at least once for every four calendar quarters.

- b. **RATA Reports.** Relative accuracy test audit reports shall be submitted to SWCAA within 45 days of test completion. An electronic copy of the test/RATA report shall be provided to SWCAA.

APPENDIX E**Boiler MACT Emission Testing Requirements – Nebraska boiler****1. Introduction:**

The purpose of this testing is to demonstrate compliance with applicable Subpart DDDDD emission limits.

2. Testing Requirements:

- a. Test Plan. The Permittee must develop a site-specific performance test plan according to 63.7(c). Ongoing performance testing shall be in accordance with methods and procedures in §63.7520, Table 5, and Table 7 to Subpart DDDDD of 40 CFR 63.
- b. Test Options.
 - i. If the Permittee chooses to comply with the alternative TSM limit, TSM shall be tested for instead of filterable PM.
- c. Testing schedule.
 - i. Subsequent performance testing shall be conducted annually and no more than 13 months after the previous performance test, except as provided in §63.7515(b)-(c);
 1. If your performance tests for a given pollutant for at least 2 consecutive years show that your emissions are at or below 75 percent of the emission limit for the pollutant, and if there are no changes in the operation or air pollution control equipment, you may choose to conduct performance tests for the pollutant every third year.
 2. If a performance test shows emissions exceeded the emission limit or 75 percent of the emission limit for a pollutant, you must conduct annual performance tests for that pollutant until all performance tests over a consecutive 2-year period meet the required limit.

3. Constituents:

The Permittee shall conduct performance testing of the hog fuel boiler for filterable PM or TSM, CO, HCl and mercury.

4. Source Operation:

Testing shall be performed at representative operating load conditions while burning the type of fuel or mixture of fuels that has the highest content of chlorine and mercury in accordance with applicable provisions in §63.7 as specified in Table 10.