SWCAA
Southwest Clean Air Agency

5101 NE 82nd Ave., Ste. 102
Vancouver, WA 98662
(360) 574-3058
www.swcleanair.gov

March 3, 2025

Aaron Poquette
Hampton Lumber Mills—Washington, Inc.
PO Box 189
Randle, Washington 98377

Re: Issuance of Draft Title V Air Operating Permit SW97-5-R3 - Renewal

Dear Mr. Poquette:

The Southwest Clean Air Agency (SWCAA) is issuing a draft renewal Title V permit to Hampton Lumber Mills—Washington, Inc. – Morton Facility. The Title V permit is being revised to incorporate the permit modifications proposed in Air Discharge Permit 22-3511, address the removal of Hampton Drying Company as a support facility, thus making Hampton Lumber Mills—Washington, Inc. – Morton Facility a Hazardous Air Pollutant minor, and to include Compliance Assurance Monitoring Requirements.

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

Sincerely,

Vannessa McClelland
Air Quality Engineer

Attachment

C: Part 70 Air Operating Permits
U.S. EPA Region X, AWT-150
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Hampton Lumber Mills - WA, Inc.
Morton Facility

Air Operating Permit
SW97-5-R3

Draft Issued: March 3, 2025

DRAFT

Southwest Clean Air Agency
5101 NE 82 Avenue, Suite 102
Vancouver, WA 98661
Telephone: (360) 574-3058

AIR OPERATING PERMIT NUMBER: SW97-5-R3

ISSUED TO:
Hampton Lumber Mills—
Washington, Inc.
302 State Route 7
Morton, WA 98356

PLANT SITE: Hampton Lumber Mills—
Washington, Inc.
Morton Facility
302 State Route 7
Morton, WA 98356

NATURE OF BUSINESS: Sawmill

STANDARD INDUSTRIAL CLASSIFICATION CODE (SIC): 2421

NORTH AMERICAN INDUSTRY CLASSIFICATION SYSTEM CODE (NAICS): 321113

AEROMETRIC INFORMATION RETRIEVAL SYSTEM NUMBER: 053-041-00003

EFFECTIVE DATE: To be determined

EXPIRATION DATE: 5 years after effective date

RENEWAL APPLICATION DUE DATE: 6 months before expiration date

PERMIT ENGINEER:

Vannessa McClelland, Air Quality Engineer Date

REVIEWED BY:

Clint Lamoreaux, Chief Engineer Date

Uri Papish, Executive Director Date

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I. ABBREVIATIONS

List of Common Abbreviations

ADP	Air Discharge Permit (aka Order of Approval)
AOP	Air Operating Permit
BACT	Best available control technology
BF	Board feet
CAM	Compliance Assurance Monitoring
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, 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 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. As listed in Sections IV through IX, the requirements describe the emissions limitations, operating requirements, ambient monitoring, recordkeeping requirements, and reporting frequencies for the facility 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, the 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 and are denoted as "*Local*" to indicate they are only enforceable by SWCAA.

For subparts of 40 CFR 60, 40 CFR 61, and 40 CFR 63 delegated to SWCAA by EPA, all monitoring, reporting, or recordkeeping that is required to be sent to the EPA Administrator must only be sent to SWCAA as the delegated authority. For specific subparts that SWCAA has not been delegated implementation and enforcement authority by the EPA, all monitoring, reporting, or recordkeeping that is required to be sent to the EPA Administrator must be sent to both SWCAA and the EPA Administrator.

Federal Regulations	Regulation Version Effective Date	SWCAA Delegation Effective Date
40 CFR 51	March 3, 2025	Not Delegated
40 CFR 52	March 3, 2025	Not Delegated
40 CFR 60 Subpart A [§60.1 et seq.]	March 3, 2025	September 1, 2022
40 CFR 60 Subpart O [§60.150 et seq.]	March 3, 2025	September 1, 2022
40 CFR 61 Subpart A [§61.01 et seq.]	March 3, 2025	September 1, 2022

40 CFR 61 Subpart E [§61.50 et seq.]	March 3, 2025	September 1, 2022
40 CFR 63 Subpart A [§63.1 et seq.]	March 3, 2025	September 1, 2022
40 CFR 63 Subpart ZZZZ [§63.6580 et seq.]	March 3, 2025	September 1, 2022 (Title V Only)
40 CFR 63 Subpart JJJJJJ [§63.11193 et seq.]	March 3, 2025	September 1, 2022 (Title V Only)
40 CFR 64	July 1, 2000	Not Delegated
40 CFR 68	March 3, 2025	Not Delegated
40 CFR 82 Subpart B	March 3, 2025	Not Delegated
40 CFR 82 Subpart F	March 3, 2025	Not Delegated
40 CFR 98	March 3, 2025	Not Delegated

State and local regulations may have both an effective date that is included in the SIP and different effective date as *Local* only requirements.

State Regulations	**SIP Regulation Version Effective Date**	**State Regulation Version Effective Date**
WAC 173-400-117	December 29, 2012	November 25, 2018
WAC 173-400-171	September 16, 2018 (excludes (3)(b) that says, "or any increase in emissions of a toxic air pollutant above the acceptable source impact level for that toxic air pollutant as regulated under chapter 173-460 WAC", (3)(o), (12))	November 25, 2018
WAC 173-400-700	April 1, 2011	November 25, 2018
WAC 173-401	—	September 16, 2018
WAC 173-441	—	March 12, 2022
WAC 173-460	—	November 22, 2019 August 21, 1998*
* Note that a newer version of WAC 173-460 has been published, however it has not been adopted by SWCAA. The version being enforced by SWCAA was effective August 21, 1998.		

SWCAA Regulations	**SIP Regulation Version Effective Date**	**SWCAA Regulation Version Effective Date**
SWCAA 400-030	September 10, 2021 (excludes (21) and (130))	March 10, 2025
SWCAA 400-036	September 10, 2021	March 10, 2025

SWCAA Regulations	SIP Regulation Version Effective Date	SWCAA Regulation Version Effective Date
SWCAA 400-040	October 9, 2016 (excludes (1)(a), (1)(c), (1)(d), (2), and (4))	March 10, 2025
SWCAA 400-040(1)(a)	September 21, 1995	March 10, 2025
SWCAA 400-050	September 10, 2021 (excludes (3), (5), (6), and (7))	March 10, 2025
SWCAA 400-060	September 10, 2021	March 10, 2025
SWCAA 400-070	October 9, 2016 (excludes (2)(a), (3)(b), (5), (6), (7), (8)(c), (9), (10), (11), (12), (14); and (15)(c))	March 10, 2025
SWCAA 400-070(2)(a)	September 21, 1995	March 10, 2025
SWCAA 400-072	September 10, 2021 (except (5)(a)(ii)(B), (5)(d)(ii)(B), (5)(d)(iii)(A), (5)(d)(iii)(B), and all reporting requirements related to TAPs)	March 10, 2025
SWCAA 400-075	—	March 10, 2025
SWCAA 400-076	—	March 10, 2025
SWCAA 400-081	October 9, 2016	March 10, 2025
SWCAA 400-091	September 10, 2021	March 10, 2025
SWCAA 400-100	—	March 10, 2025
SWCAA 400-103	—	March 10, 2025
SWCAA 400-105	September 10, 2021 (excludes reporting requirements related to TAPs)	March 10, 2025
SWCAA 400-106	September 10, 2021 (except (1)(d)–(1)(g) and (2))	March 10, 2025
SWCAA 400-107	September 21, 1995	March 10, 2025
SWCAA 400-109	September 10, 2021 (except TAP emissions thresholds (3)(d), (3)(e)(ii), and (4))	March 10, 2025
SWCAA 400-110	September 10, 2021 (except (1)(d))	March 10, 2025
SWCAA 400-113	September 10, 2021 (except (5))	March 10, 2025
SWCAA 400-114	September 10, 2021	March 10, 2025
SWCAA 400-115	—	March 10, 2025
SWCAA 400-116	November 9, 2003	March 10, 2025

SWCAA Regulations	SIP Regulation Version Effective Date	SWCAA Regulation Version Effective Date
SWCAA 400-120	—	March 10, 2025
SWCAA 400-130	October 9, 2016	March 10, 2025
SWCAA 400-131	October 9, 2016	
SWCAA 400-136	September 10, 2021	
SWCAA 400-141	—	
SWCAA 400-151	September 10, 2021	March 10, 2025
SWCAA 400-161	March 18, 2001	
SWCAA 400-171	September 10, 2021 (except (2)(a)(xii))	March 10, 2025
SWCAA 400-200	October 9, 2016	March 10, 2025
SWCAA 400-205	March 18, 2001	March 10, 2025
SWCAA 400-235		March 10, 2025
SWCAA 400-270		March 10, 2025
SWCAA 400 Appendix A	March 21, 2020	March 10, 2025
SWCAA 425	—	June 18, 2017
SWCAA 476	—	March 22, 2020

Regulatory Orders, Prevention of Significant Deterioration (PSD) permits, and ADPs listed in the table below were issued under state/local authority or a federally-approved new source review program; therefore, the terms of these orders and permits are federally enforceable, unless otherwise identified. The following table lists the currently active ADP; there are no PSD permits or regulatory orders applicable to this facility.

Regulatory Orders and Permits	Effective Date
ADP 22-3511	June 28, 2022

III. EMISSION UNIT IDENTIFICATION

The following emission units or processes and control equipment have been identified at the facility. The emission unit (EU) identification number (EU-#) will be used throughout the remainder of the Permit to identify the emission unit or process and any associated control equipment.

ID #	Generating Equipment/Activity	Emission Control	CAM Applicable
EU-1	Log Yard	Water truck	No
EU-2	Sawmill - Planer, Bunkers, Hog	Building enclosures, Western Pneumatics baghouse Plastic sheeting and wet suppression	No
EU-3	Hog Fuel Boiler (ABCO Industries)	One multi-clone/Branch Environmental wet venturi scrubber combination One settling pond	Yes for PM on scrubber
EU-4	Dry Kilns	None	No
EU-5	Anti-Stain Treatment	Mist eliminator	No
EU-6	Office Emergency Propane Engine	Low sulfur fuel, limited hours	No
EU-7	Fire Pump Emergency Diesel Engine	Low sulfur fuel, limited hours	No

The ABCO Industries hog fuel boiler is subject to Title 40 CFR 63 Subpart JJJJJJ: National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources. It is an existing hybrid suspension biomass boiler and has an oxygen trim system.

IV. PERMIT PROVISIONS

P1. Credible Evidence

40 CFR 60.11
40 CFR 61.12
SWCAA 400-235 (*Local*)

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 must 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 (*Local*)

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 must be released only after legal opinion by SWCAA's legal counsel and notice to the Permittee of the intent to release or deny the release of information. [SWCAA 400-270]

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

Upon request, the Permittee must also furnish to SWCAA 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 EPA along with a claim of confidentiality. SWCAA must maintain confidentiality of such information in accordance with Revised Code of Washington (RCW) 70A.15.2510. [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) must not exceed the emissions thresholds specified in WAC 173-401-530(4) until this Permit is modified pursuant to WAC 173-401-725.

P4. Standard Provisions

WAC 173-401-620(2)
SWCAA 400-103 (*Local*)

(a) *Duty to comply*. The Permittee must comply with all conditions of this Permit. Any Permit noncompliance constitutes a violation of RCW 70A.15 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 must 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 must furnish to SWCAA, within a reasonable time, any information that the SWCAA 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 must also furnish to SWCAA 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 EPA along with a claim of confidentiality. SWCAA must maintain confidentiality of such information in accordance with RCW 70A.15.2510.

(f) *Permit fees*. The Permittee must pay fees in accordance with RCW 70A.15.2270 and SWCAA's fee schedule. Failure to pay fees in a timely fashion shall subject the Permittee to civil and criminal penalties as prescribed in RCW 70A.15.3150, RCW 70A.15.3160, and SWCAA 400-103(9).

(g) *Emissions trading*. No permit revision must 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 must 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 SWCAA 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 FCAA Section 505(b).

(j) *Permit continuation*. This Permit and all terms and conditions contained herein do 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) remains in effect until the renewal Permit has been issued or denied if a timely and complete application has been submitted.

P5. Federally Enforceable Requirements WAC 173-401-625

All terms and conditions in this Permit, including any provisions designed to limit a source's potential to emit, are enforceable by the EPA and citizens under the FCAA.

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 specifically designated as "*Local*" and 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.

P6. Permit Shield WAC 173-401-640

Compliance with the conditions of this Permit must 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 must alter or affect the following:

(a) The provisions of section 303 of the FCAA (emergency orders), including the authority of the EPA 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 the EPA to obtain information from a source pursuant to section 114 of the FCAA; and

(e) The ability of SWCAA to establish or revise requirements for the use of reasonably available control technology (RACT) as defined in RCW 70A.15.

P7. Emergency Provision WAC 173-401-645

An "emergency" as defined in WAC 173-401-645(1), must constitute an affirmative defense to an action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency must be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(a) An emergency occurred and that the Permittee can identify the causes(s) of the emergency;

(b) The permitted facility was at the time being properly operated;

(c) During the period of the emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the Permit; and

(d) The Permittee submitted notice of the emergency to SWCAA within two working days of the time when emission limitations were exceeded due to the emergency or shorter periods of time specified in an applicable requirement. This notice fulfills the requirement of WAC 173-401-615(3)(b) unless the excess emissions represent a potential threat to human health and safety. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

Burden of proof lies with the Permittee.

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 must 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)**

SWCAA may revoke a Permit only upon the request of the Permittee or for cause. SWCAA must 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 must include an explanation of the basis for the proposed action and afford the Permittee/applicant an opportunity to meet with SWCAA prior to the authority's final decision. A revocation issued under WAC 173-401-710(4) 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. 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, as applicable.

P11. Reopening for Cause **WAC 173-401-730**

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

(a) Additional applicable requirements become applicable to a source with a remaining permit term of three or more years. Such a reopening must 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 EPA, excess emissions offset plans must be deemed to be incorporated into the Permit;

(c) SWCAA or the EPA 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) SWCAA or the EPA determines that the Permit must be revised or revoked to assure compliance with the applicable requirements.

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

P12. Unavoidable Excess Emissions SWCAA 400-107(2)

The provisions of SWCAA 400-107 do not apply to federal standards, emission limits or standards contained in a PSD permit issued solely by EPA, or any event that causes a monitored exceedance of any relevant ambient air quality standard.

Excess emissions determined to be unavoidable under the procedures and criteria below are violations of the applicable statute, rule, permit or regulatory order. The decision that excess emissions are unavoidable is made by the SWCAA.

Excess emissions determined by SWCAA to be unavoidable are a violation subject to the SWCAA 400-230(3), (4) and (6), but not subject to civil penalty under SWCAA 400-230(2). In a federal enforcement action filed under 42 USC 7413 or 7604 the decision-making authority shall determine what weight, if any, to assign to the SWCAA's determination that an excess emissions event does or does not qualify as unavoidable under the criteria in subsections (a) and (b) below.

(a) *Startup or shutdown.* Excess emissions due to an upset or malfunction during a startup or shutdown event must be treated as an upset or malfunction under subsection (b).
(b) *Upsets or malfunctions.* Excess emissions due to upsets or equipment malfunctions shall be considered unavoidable provided the Permittee reports as required under of SWCAA 400-107(1) and adequately demonstrates that:
    (1) The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition;
    (2) The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance;
    (3) The operator took immediate and appropriate corrective action in a manner consistent with safety and 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;

(4) Repairs were made in an expeditious fashion if the emitting equipment could not be shutdown during the malfunction or upset to prevent the loss of life, prevent personal in-jury or severe property damage, or to minimize overall emissions;

(5) All emission monitoring systems and pollution control systems were kept operating to the extent possible unless their shutdown was necessary to prevent loss of life, personal injury, or severe property damage;

(6) The amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent possible; and

(7) All practicable steps were taken to minimize the impact of the excess emissions on ambient air quality.

V. GENERAL TERMS AND CONDITIONS

G1. Asbestos **40 CFR 61 Subpart M**
SWCAA 400-075 (*Local*)
SWCAA 476 (*Local*)

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

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

(b) The date on which a regulated substance is first present above a threshold quantity in a process. [40 CFR 68.10]

G3. Protection of Stratospheric Ozone **40 CFR 82 Subpart B (§82.30)**
40 CFR 82 Subpart F (§82.150)

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

G4. Duty to Supplement or Correct Application **WAC 173-401-500(6)**

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

G5. Certification **WAC 173-401-520**

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

G6. Inspection and Entry **WAC 173-401-630(2) SWCAA 400-105(2) and (3)**

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

(a) Enter upon the Permittee's premises where a 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) Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the Permit or applicable requirements.

G7. Schedule of Compliance **WAC 173-401-630(3)**

The Permittee must continue to comply with all applicable requirements with which the source is currently in compliance. The Permittee must meet on a timely basis any applicable requirements that become effective during the permit term. The Permittee must comply with any approved schedule of compliance in accordance with WAC 173-401-510(2)(h)(iii).

G8. Permit Renewal Application **WAC 173-401-710(1) WAC 173-401-610**

The Permittee must submit a complete permit renewal application to SWCAA no later than the date established in the Permit. Permit expiration terminates the Permittee'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 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 **[XX Expiration Date XX]**. A renewal application is due on **[Expiration date minus 12 months]** and a complete application is due no later than **[Expiration date minus 6 months]**.

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. Reporting of Emissions of Greenhouse Gases **WAC 173-441 (*Local*)**

WAC 173-441 requires owners and operators of affected facilities to quantify and report emissions of greenhouse gases (GHG) 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 (10,000) metric tons of carbon dioxide equivalent (CO_2e) or more per calendar year. The Permittee must prepare and submit greenhouse gas reports to Ecology for each affected facility in accordance with WAC 173-441, as applicable.

G11. Climate Commitment Act Program Rule **WAC 173-446 (*Local*)**

The Permittee must prepare and submit reports for covered emissions as required by the cap and invest program implemented under WAC 173-446 and comply with applicable GHG emission caps, as applicable. Covered emissions do not include carbon dioxide emissions from the combustion of biomass, renewable fuels of biogenic origin, or biofuels from any facility. Emissions of other GHGs related to the combustion of biomass or biofuels are not exempt. [WAC 173-446-040(2)(a)(i)]

G12. Misrepresentation and Tampering **SWCAA 400-105(5) and (6)**

The Permittee must not make any false material statement, representation or certification in any form, notice, or report required under RCW 70A.15, or any ordinance, resolution, regulation, permit or order in force pursuant thereto.

The Permittee must not render inaccurate any monitoring device or method required under RCW 70A.15, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto.

G13. Emission Testing and Monitoring **SWCAA 400-106**

SWCAA may conduct or require that emission testing be conducted of any "source" or emission unit within the jurisdiction of SWCAA to determine compliance, evaluate control equipment performance, evaluate RACT, or quantify emissions.

The Permittee must provide the necessary platform and sampling ports for SWCAA personnel or others to perform a test of an emission unit. SWCAA must be allowed to obtain a sample from any emission unit. The Permittee must be given an opportunity to observe the sampling and to obtain a sample at the same time.

G14. Portable Sources **SWCAA 400-110(6)**
SWCAA 400-036

Portable sources which locate temporarily at a source are allowed to operate at the temporary location without filing an ADP application provided that:

(a) The source/emissions units are registered with SWCAA;

(b) The source/emissions units have an ADP to operate as a portable source;

(c) The owner(s) or operator(s) notifies SWCAA of the intent to operate at the new location at least ten business days prior to starting the operation;

(d) The owner(s) or operator(s) supplies sufficient information including production quantities and hours of operation, to enable SWCAA to determine that the operation will comply with the emission standards for a new source, and will not cause a violation of applicable ambient air quality standards and, if in a nonattainment area, will not interfere with scheduled attainment of ambient standards; and

(e) Portable sources that do not have a valid ADP 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 ADP application pursuant to SWCAA 400-109 or obtaining an ADP pursuant to SWCAA 400-110 provided the requirements of SWCAA 400-036 are met.

G15. New Source Review **WAC 173-400-117**
WAC 173-400-720
WAC 173-460 (*Local*)
SWCAA 400-072
SWCAA 400-076 (*Local*)
SWCAA 400-109
SWCAA 400-110
SWCAA 400-820

The Permittee must submit an application and approval must be issued or written confirmation of exempt status must be received before commencing construction of the proposed installations, modifications, changes, or alternations. Alternatively, for sources meeting the category criteria in SWCAA 400-072, the Permittee may submit a Small Unit Notification and begin installation after SWCAA has confirmed compliance with the provisions of SWCAA 400-072 in writing. Portable sources may be exempt from this requirement if they fulfill the criteria described in that section**.**

G16. 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 must file an ADP application with SWCAA. Construction must not commence on a project subject to review until SWCAA issues a final ADP or other regulatory order. However, any ADP application filed under this section is deemed to be approved without conditions if SWCAA takes no action within thirty (30) days of receipt of a complete application.

G17. Process Equipment **SWCAA 400-116(1)**
ADP 22-3511 Condition 13

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, such as an ADP, must be maintained and operate in good working order.

SWCAA 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.

G18. Pollution Control Equipment **SWCAA 400-116(2)**
ADP 22-3511 Condition 14

Any equipment that serves as air contaminant control or capture equipment must be maintained and operate in good working order at all times in accordance with good operations and maintenance practices and in accordance with SWCAA's approval conditions. SWCAA 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.

G19. Adjustment for Atmospheric Conditions **SWCAA 400-205**

Varying the rate of emission of a pollutant according to atmospheric conditions or ambient concentrations of that pollutant is prohibited, except as directed according to air pollution episode regulations as specified at SWCAA 400-230(5).

G20. Outdoor Burning **SWCAA 425 (*Local*)**

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

VI. OPERATING TERMS AND CONDITIONS

The following table lists federal, state, and locally enforceable 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 requirements that are enforceable only by SWCAA are denoted with "Local". Any requirement with "Facility-wide" listed in the Emission Unit column applies universally to all emission units or activities, regardless of whether identified as an EU or an insignificant emission unit (IEU). Monitoring requirements are used to provide a reasonable assurance of compliance with the applicable requirements and may or may not involve the use of a reference test method.

Req.	Requirement	Emission Unit	Monitoring
Req-1	Permittee must not cause or permit any emission that exceeds 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)	Facility-wide	M3
Req-2	Permittee must 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) *Local*	Facility-wide	M4, M6
Req-3	Permittee must 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)	Facility-wide	M5, M6
Req-4	Permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum. SWCAA 400-040(4) *Local* ADP 22-3511 Condition 12 *Local*	Facility-wide	M6
Req-5	Permittee must not cause or permit the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person or causes damage to property or business. SWCAA 400-040(5)	Facility-wide	M6

Req.	Requirement	Emission Unit	Monitoring
Req-6	Permittee must 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, corrected to 7% O_2 for combustion sources, and based on an average of 60 minutes. Reference Test Method: 40 CFR 60, Appendix A - EPA Method 6 SWCAA 400-040(6)	Facility-wide	M8
Req-7	Permittee must 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. SWCAA 400-040(7)	Facility-wide	M7
Req-8	Permittee must take reasonable precautions to prevent emissions of fugitive dust and operate the source to minimize emissions. SWCAA 400-040(8)(a)	Facility-wide	M5, M6
Req-9	At all times, the Permittee must operate and maintain the ABCO 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. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. 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. 40 CFR Part 63, Subpart JJJJJJ: §63. 11205(a)	EU3	M9
Req-10	Permittee must 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 must 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. Reference Test Method: 40 CFR 60, Appendix A - EPA Method 5 SWCAA 400-050(1)&(4)	Facility-wide	M4, M18

Req.	Requirement	Emission Unit	Monitoring
Req-11	Permittee must 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. Reference Test Method: 40 CFR 60, Appendix A - EPA Method 5 SWCAA 400-060	Facility-wide	M4, M16
Req-12	Permittee must not cause or permit any visible emissions from operation of the ABCO Industries hog fuel boiler which exceeds fifteen percent (15%) opacity for more than three (3) minutes in any one-hour period. a) When visible emissions occur due to soot blowing/grate cleaning of the ABCO boiler, visible emissions must not exceed forty percent opacity (40%) for more than fifteen (15) minutes in any eight (8) consecutive hours. b) When visible emissions occur due to start-up and shutdown of the ABCO boiler, visible emissions must not exceed twenty percent opacity (20%) for more than three (3) minutes in any hour. c) When visible emissions occur due to start-up following refractory work, visible emissions must not exceed forty percent opacity (40%) for more than three (3) minutes in any hour. Reference Test Method: SWCAA 400, Appendix A – SWCAA Method 9 SWCAA 400-040(1) ADP 22-3511 Condition 9	EU3	M3
Req-13	Permittee must not cause or permit any visible emissions from operation of the dry kilns which exceed five percent (5%) opacity for more than three (3) minutes in any one-hour period. Reference Test Method: SWCAA 400, Appendix A – SWCAA Method 9 ADP 22-3511 Condition 9	EU4	M3

Req.	Requirement	Emission Unit	Monitoring
Req-14	Permittee must not cause or permit any visible emissions from operation of the emergency generator engine and fire pump emergency diesel engine which exceed five percent (5%) opacity for more than three (3) minutes in any one-hour period. a) When visible emissions occur due to start-up and shutdown, visible emissions must not exceed twenty percent opacity (20%) for more than three (3) minutes in any hour. b) The start-up period is defined as the first twenty (20) minutes of operation from a cold start and shutdown is defined as when fuel flow to the engine has stopped. Reference Test Method: SWCAA 400, Appendix A – SWCAA Method 9 ADP 22-3511 Condition 10	EU6, EU7	M3
Req-15	Permittee must not cause or permit any visible emissions from operation of the hog which exceed five percent (5%) opacity for more than three (3) minutes in any one-hour period. Reference Test Method: SWCAA 400, Appendix A – SWCAA Method 9 ADP 22-3511 Condition 9	EU2 (hog)	M3
Req-16	Permittee must not cause or permit any visible emissions from the log yard and mill which exceeds zero percent (0%) opacity for more than three (3) minutes in any one-hour period. Reference Test Method: SWCAA 400, Appendix A – SWCAA Method 9 ADP 22-3511 Condition 9	EU1, EU2 (except hog)	M3
Req-17	Emissions from the hog must not exceed the following: Pollutant — Emission Limit PM_{10} — 0.74 tons per year ADP 22-3511 Condition 1	EU2	M13

Req.	Requirement	Emission Unit	Monitoring
Req-18	Emissions from the Western Pneumatics baghouse must not exceed the following: Pollutant — Emission Limit $PM/PM_{10}/PM_{2.5}$ — 10.51 tons per year; 0.005 gr/dscf, one-hour average ADP 22-3511 Condition 2	EU2	M12, M16
Req-19	Emissions from all bin unloading must not exceed the following: Pollutant — Emission Limit PM — 27.39 tons per year PM_{10} — 16.34 tons per year $PM_{2.5}$ — 6.30 tons per year ADP 22-3511 Condition 3	EU2	M12
Req-20	Emissions from the ABCO Industries hog fuel boiler operation must not exceed the following corrected to 7% O_2: Pollutant — Emission Limit NO_x — 125.0 tons per year; 175 ppm, one-hour average CO — 131.0 tons per year; 300 ppm, one-hour average PM/PM_{10} — 43.0 tons per year; 0.050 gr/dscf, one-hour average (filterable only for compliance) During periods of start-up and shutdown, the work practices listed below must be met, and the above concentration limits do not apply. During typical start-up of the hog fuel boiler: (a) The boiler must be operated to minimize emissions, which includes, but is not limited to, starting on clean fuels (as defined by 40 CFR 63 Subpart DDDDD "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.") Start-up periods following refractory work must not exceed 36 hours. *Useful thermal energy* means energy (i.e., steam, hot water, or process heat) that meets the minimum operating temperature, flow, and/or pressure required by any energy use system that uses energy provided by the affected boiler or process heater. ADP 22-3511 Condition 4, 26	EU3	M18, M19

Req.	Requirement	Emission Unit	Monitoring
Req-21	Emissions from lumber drying operations must not exceed the following: Pollutant — Emission Limit VOC — 139.00 tons per year PM/PM_{10} — 4.30 tons per year Acetaldehyde — 9.61 tons per year *Local* Acrolein — 0.15 tons per year *Local* Formaldehyde — 0.32 tons per year *Local* Methanol — 9.27 tons per year *Local* ADP 22-3511 Condition 5	EU4	M11, M17
Req-22	Emissions from the anti-stain treatment must not exceed the following: Pollutant — Emission Limit VOC — 0.006 tons per year ADP 22-3511 Condition 6	EU5	M14
Req-23	Emissions from the office emergency propane engine must not exceed the following: Pollutant — Emission Limit NO_X — 2.97 pounds per hour and 0.30 tons per year CO — 0.23 pounds per hour and 0.02 tons per year PM_{10} — 0.007 pounds per hour and 0.001 tons per year ADP 22-3511 Condition 7	EU6	M15
Req-24	Emissions from the fire pump diesel engine must not exceed the following: Pollutant — Emission Limit NO_X — 6.98 pounds per hour and 0.70 tons per year CO — 1.50 pounds per hour and 0.15 tons per year PM_{10} — 0.05 pounds per hour and 0.05 tons per year ADP 22-3511 Condition 8	EU7	M15
Req-25	A street sweeper must be used weekly on paved roads and a watering truck must be used daily on unpaved roads when significant rainfall has not occurred for 15 days or more, or more frequently as needed to minimize fugitive dust. ADP 22-3511 Conditions 16, 17	EU2	M5

Req.	Requirement	Emission Unit	Monitoring
Req-26	Exhaust gases from the Western Pneumatics baghouse, ABCO Industries hog fuel boiler, and dry kilns must be discharged vertically. Any device that obstructs or prevents vertical discharge while in operation is prohibited. ADP 22-3511 Condition 15	EU2, EU3, EU4	M5
Req-27	The Western Pneumatics baghouse must be equipped with a differential pressure gauge to continuously measure the pressure differential (ΔP) across the filtration media. ADP 22-3511 Condition 18	EU2	M7, M12
Req-28	Work Practice Standards for the ABCO Hog Fuel Boiler 40 CFR Part 63: The following work practice standards apply: a. The Permittee must conduct a one-time energy assessment performed by a qualified energy assessor that meets the requirements for energy assessments in Table 2 to Subpart JJJJJJ of Part 63. 40 CFR Part 63, Subpart JJJJJJ: §63.11196(a)(3)(e); Table 2	EU3	M9
Req-29	The scrubber must be in operation at all times when the ABCO Industries hog fuel boiler is operating. ADP 22-3511 Condition 19	EU3	N/A
Req-30	The scrubber water quality must be visually evaluated on a daily basis in accordance with Appendix E of ADP 22-3511 [found in Appendix E of this Permit]. Suspended solids testing must be conducted on a quarterly basis. ADP 22-3511 Condition 20	EU3	M10
Req-31	The scrubber water flocculent must be added to scrubber water on a daily basis as needed. ADP 22-3511 Condition 21	EU3	M10
Req-32	The scrubber must operate with a minimum differential pressure of 15" w.c. and a minimum process water circulation rate of 170 gpm. A differential pressure gauge must be installed and maintained to measure pressure drop across the throat of the scrubber. A flow meter must be installed and maintained to measure the scrubber water circulation flow rate. The scrubber settling pond must have a minimum capacity of 3,000 ft^3 and the deep end of the settling pond must have a water depth of at least 3 feet to assure proper operation of the scrubber system. ADP 22-3511 Conditions 22-24	EU3	M7, M9, M10

Req.	Requirement	Emission Unit	Monitoring
Req-33	The ABCO Industries hog fuel boiler must be equipped with an oxygen meter capable of continuously monitoring oxygen levels in the exhaust gas. ADP 22-3511 Condition 25	EU3	M7, M9
Req-34	Dry kilns are approved for use with Douglas fir, western hemlock, Sitka spruce, Engelmann spruce, lodgepole pine, ponderosa pine, alpine fir, grand fir, silver fir, and noble fir. 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: (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. ADP 22-3511 Condition 27	EU4	M11
Req-35	The dry kiln dry bulb set point temperature must not exceed 200°F on a 24-hr average. ADP 22-3511 Condition 28	EU4	M7, M11
Req-36	Dry kiln doors must be kept closed at all times during active drying operations. ADP 22-3511 Condition 29	EU4	M5
Req-37	All containers for VOC containing materials must be kept securely closed with a lid in place except when in active use. Open containers for storage, transfer or disposal of VOC containing materials are prohibited. In addition, all VOC containing materials used to clean and/or flush spray equipment or lines during clean up must be collected and stored in a closed container. ADP 22-3511 Condition 30	EU5	M14
Req-38	The office emergency engine and fire pump engine must be operated only for maintenance checks, readiness testing, and as necessary, to provide emergency power. ADP 22-3511 Condition 31 40 CFR 63.6640(f)(2)(i)	EU6, EU7	M15

Req.	Requirement	Emission Unit	Monitoring
Req-39	Operation of the office emergency engine and fire pump engine for maintenance checks and readiness testing must not exceed 100 hr/yr per engine. Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing. Emergency operation is not limited. A nonresettable hourmeter must be installed and maintained on the office emergency engine and fire pump engine to measure hours of unit operation. ADP 22-3511 Condition 32 40 CFR 63.6640(f)(4)	EU6, EU7	M15
Req-40	The fire pump engine must only be fired on #2 diesel or better. The sulfur content of the fuel fired in the diesel engine must not exceed 0.0015% by weight (15 ppmw). A fuel certification from the fuel supplier may be used to demonstrate compliance with this requirement. ADP 22-3511 Condition 33 40 CFR 60.4207(b) SWCAA 400-050(2)	EU7	M15
Req-41	The fire pump diesel engine and office emergency propane engine must be operated and maintained in accordance with the manufacturer's emission-related operation and maintenance instructions or the Permittee's own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. 40 CFR 63.6625(e) & 40 CFR 63.6605(b)	EU6, EU7	M15
Req-42	The Permittee must conduct the following maintenance for the fire pump diesel engine: a. Change oil and filter every 500 hours of operation or annually, whichever comes first except as provided in 40 CFR 63.6625(i); b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. 40 CFR 63.6603 & Table 2d, Section 1 40 CFR 63.6625(e)	EU7	M15

Req.	Requirement	Emission Unit	Monitoring
Req-43	The Permittee must conduct the following maintenance for the office emergency propane engine: a. Change oil and filter every 500 hours of operation or annually, whichever comes first except as provided in 40 CFR 63.6625(j); b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. 40 CFR 63.6602 & Table 2d, Section 6 40 CFR 63.6625(e)	EU6	M15
Req-44	The Permittee must minimize the time the office emergency propane engine and fire pump diesel engine spend at idle and minimize the start-up time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. 40 CFR 63.6625(h)	EU6, EU7	M15

VII. MONITORING AND RECORDKEEPING TERMS AND CONDITIONS

The permittee must conduct each of the monitoring and recordkeeping activities listed below. All monitoring information required by this permit must be recorded and readily available on-site for inspection. [WAC 173-401-615(2)]

All records and supporting information required by this Permit must be kept for a minimum period of no less than five years and must be maintained in a form readily available for inspection by SWCAA representatives. [WAC 173-401-615(2)(c)]

Pursuant to WAC 173-401-530(2)(c), the following monitoring and recordkeeping requirements do not apply to IEUs unless specified.

M1. General Recordkeeping — WAC 173-401-615(2); ADP 22-3511 Conditions 34-36, 45-46 Appendices A-D

Except for data recorded by an automated system, each record required by this Permit must include, at a minimum, the date and the name of the person making the record entry. For those records required for a control device or process, if the control device or process is not operating during a specific time period, a record must be made to that effect.

The Permittee must keep the following records as applicable:

(a) Inspections and Certifications
- (1) Date and time of the inspection or certification;
- (2) Name and title of the person who conducted the inspection or certification;
- (3) Identification of the unit or activity being inspected or certified;
- (4) Operating conditions of the unit or the type of activity occurring at the time of the inspection or certification;
- (5) Compliance status of each monitored requirement as described in Sections V and VII of this Permit; and
- (6) Description of corrective action (if any) taken in response to a discovered permit deviation, excess emission, upset condition, or malfunction, as applicable.

(b) Complaints
- (1) Date and time of complaint;
- (2) Name of the complainant;
- (3) Description of the complaint;
- (4) Date and time of follow-up inspection;
- (5) The name and title of the person who conducted the follow-up inspection; and
- (6) Description of corrective action (if any) taken in response to the complaint.

(c) Sampling and Emissions Testing
- (1) Date sampling was performed;
- (2) Name and title of the person or the entity that performed the sampling or testing;
- (3) The description of the source, including manufacturer, model number and design capacity, and the location of the sample ports or test locations;
- (4) Summary of production related parameters;
- (5) Techniques or method used to take the sample or perform the observation, including laboratory data, QA/QC procedures, and documentation;
- (6) The test methods or procedures used, including all field data, QA/QC procedures and documentation;
- (7) Operating conditions existing at the time of sampling or measurement;
- (8) Date analytical analyses (if any) were performed;
- (9) Entity that performed the analyses;
- (10) Chain of custody information;
- (11) Analytical techniques or methods used to perform the analyses;
- (12) Results of such analyses;
- (13) Calibration documentation;
- (14) Analyzer response check documentation;
- (15) Compliance status of each monitored requirement; and
- (16) Description of corrective action taken in response to permit deviations and when action was initiated.

(d) Periodic Monitoring and Emissions Records
- (1) Date and time of parameter observation or emission calculation;
- (2) Name of parameter observed or emission calculated;
- (3) Observed parameter value or calculated emission value with appropriate units; and
- (4) Periods that data was unavailable.

(e) Excess Emissions and Permit Deviations
- (1) Date and time of excess emission or permit deviation occurred;
- (2) Description and duration of the excess emission or permit deviation event and an identification of the affected unit, process, or activity; and
- (3) Description of corrective action taken in response to a discovered permit deviation, excess emission, upset condition, or malfunction, as applicable.

(f) Maintenance Activities
- (1) Date and time of the maintenance activity;
- (2) Name of the person/company who performed the maintenance;
- (3) Identification of the unit or activity being maintained; and
- (4) Description of the maintenance being conducted.

(g) Changes at Source
- (1) Date changes were made to the source that resulted in emissions of a regulated air pollutant but not otherwise regulated under the permit;
- (2) Description of the changes made to the source; and
- (3) Quantity of emissions resulting from the changes.

M2. Boiler Recordkeeping 40 CFR Part 63 Section 11225

Required boiler records must be in a form suitable and readily available for expeditious review. Each record must be kept for five (5) years following the date of each recorded action. The records must be kept on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least two (2) years after the date of each recorded action. You may keep the records off site for the remaining three (3) years. The following compliance records are required for boilers at the facility as specified:

(a) A copy of the Initial Notification and Notification of Compliance Status required by Subpart JJJJJJ and report that you submitted each record.

(b) Records to document conformance with the work practices as required as follows:
  (i) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
  (ii) For each boiler required to conduct an energy assessment, you must keep a copy of the energy assessment report.

(c) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.

(d) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.

[WAC 173-401-615(1)(a); §63.10(b)(1); §63.11225(c)(1), (c)(2)(i), (c)(2)(iii), (c)(4), (c)(5), (d) to Subpart JJJJJJ of 40 CFR Part 63]

M3. Visible Emissions Monitoring WAC 173-401-615(1)

This monitoring requirement applies to Requirements 1, 12, 13, 14, 15, and 16.

The Permittee must 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 must verify the equipment causing the emissions. The Permittee must 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. Within 24 hours of initial discovery, Permittee must resolve the visible emissions or excess emissions problem, or notify SWCAA by the next working day of progress made in resolving the operational problem. Implementation of corrective action does not relieve the Permittee from the obligation of reporting permit deviations as specified in WAC 173-401-615(3).

M4. Particulate Matter Emissions Monitoring WAC 173-401-615(1)

This monitoring requirement applies to Requirements 2, 10, and 11.

The Permittee must 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 must verify the equipment causing the emissions. The Permittee must 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 must 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).

M5. Fugitive Emissions Monitoring and Emissions **WAC 173-401-615(1)**
ADP 22-3511 Conditions 15-17, 29, 37

This monitoring requirement applies to Requirements 3, 8, 25, 26, and 36.

The Permittee must 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 must determine the source of the emissions and perform a visible emission evaluation. The Permittee must within 60 minutes of discovery confirm whether the equipment involved is experiencing a malfunction, and whether reasonable precautions and good work practices are being employed to minimize emissions. For purposes of this condition, reasonable precautions must include, but not be limited to, the following:

(a) The water truck must be used daily on unpaved roads when significant rainfall has not occurred for 15 days or more, or more frequently as needed to prevent fugitive dust;
(b) The street sweeper (or similar device such as a water truck) must be used weekly on paved roads when significant rainfall has not occurred for 15 days or more, or more frequently as needed to prevent fugitive dust;
(c) Exhaust gas from the sawmill baghouse (EU-2), ABCO Industries hog fuel boiler (EU-3) and dry kilns (EU-4) must be discharged vertically into the ambient air. Any device that obstructs or prevents vertical discharge while in operation is prohibited; and
(d) Dry kiln doors must be kept closed at all times during active drying operations.

M6. Complaint Monitoring **WAC 173-401-615(1)**

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

The Permittee must 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 must be investigated no later than one workday after the Permittee has been notified. Investigation must 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.

M7. Compliance Certification **40 CFR Part 63 Section 7525**
WAC 173-401-615(1)
ADP 22-3511 Conditions 18, 22, 23, 25, 28

This monitoring requirement applies to Requirements 7, 27, 32, 33, and 35.

The Permittee must certify the following in each semi-annual report:

(a) Installed equipment does not conceal or mask any emissions which are otherwise in violation of general standards;
(b) Equipment capable of monitoring the following parameters on a continuous basis is installed and maintained:
  (i) Dry kiln operating temperature for all kilns;
  (ii) Steam production and excess oxygen of ABCO Industries hog fuel boiler;
  (iii) Pressure drop across the throat of the scrubber; and
  (iv) An oxygen analyzer system or a continuous emission monitoring system for CO and oxygen the ABCO Hog Fuel Boiler.
(c) Equipment capable of monitoring the scrubber water circulation rate is installed and maintained; and
(d) A differential pressure gauge which indicates the pressure differential across the filtering media of the Western Pneumatics baghouse is installed and maintained.

M8. SO_2 Emission Standard **WAC 173-401-615(1)**

This monitoring requirement applies to Requirement 6.

The Permittee must certify in each semi-annual report that only hog fuel is used to fire the hog fuel boiler at Hampton Lumber - Morton.

M9. Hog Fuel Boiler Operations Monitoring and Emissions Filterable PM CAM **40 CFR 63.11210**
40 CFR 64.6(c), 64.7(a), 64.7(c)
WAC 173-401-615(1)(b)
ADP 22-3511 Condition 41

This monitoring requirement applies to Requirements 9, 28, 32, and 33.

The Permittee must monitor boiler operations as follows:

(a) Pressure drop across the throat of the scrubber monitored continuously and recorded as a 30-day rolling average;
(b) Scrubber flow (water circulation rate) monitored continuously and recorded as a daily average and a 30-day rolling average;
(c) Steam production flow rate for the ABCO Industries hog fuel boiler monitored continuously and recorded as a 30-day rolling average;

(d) Excess oxygen for the ABCO Industries hog fuel boiler's exhaust gas monitored continuously and recorded as a 30-day rolling average;
(e) Hog fuel consumption for the ABCO Industries hog fuel boiler recorded monthly;
(f) Hours of operation for the ABCO Industries hog fuel boiler recorded monthly;
(g) Cold start-up periods for each occurrence for the ABCO Industries hog fuel boiler; and
(h) Maintenance and repair activities completed on the ABCO Industries hog fuel boiler and scrubber.

The Permittee must 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 must 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 must resolve the operational deficiency or notify SWCAA by the next business day following the day of discovery 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).

Compliance Assurance. Compliance with applicable filterable PM emission limits is considered to be assured during all periods in which the scrubber flow is equal to, or greater than, a daily average liquid flow rate as established by CAM compliance testing.
Minimum Data Recovery. For the scrubber flow, the permittee must recover valid monitoring data for at least 90% of the time the hog fuel boiler is required to be monitored. Data recorded during monitoring system malfunctions, associated repairs, and required quality assurance or control activities must not be used for purposes of assessing the operation of the control device being monitored.
Excursions. Scrubber flow that falls below a daily average liquid flow rate as established by CAM compliance testing constitutes an excursion. Each such period must be reported as an excursion in accordance with Section R3 of this Permit. Start-up or shutdown events and periods of scrubber maintenance are not considered to be excursions.

For 40 CFR Part 63:

Complete the one-time energy assessment specified in Table 2 by no later than March 21, 2014, (completed February 19, 2015, for Subpart DDDDD which was required by January 31, 2016).

M10. Settling Pond Water Quality Monitoring ADP 22-3511 Condition 41

This monitoring requirement applies to Requirements 30, 31, and 32.

The Permittee must maintain and monitor settling pond water quality as follows:

(a) The scrubber settling pond water depth at the deep side of the pond recorded daily;
(b) The quantity of flocculent added must be predetermined by the Permittee. The flocculent delivery system must be monitored on a daily basis for proper function and to assure flocculent is added to the scrubber pond. Facility personnel must correct delivery system

malfunctions as soon as possible. Flocculent must be manually delivered as necessary to the scrubber pond if the delivery system cannot be fixed within eight (8) hours;

(c) Scrubber water quality must be visually evaluated on a daily basis using the standard procedure as described in Appendix E of this Permit. Results of the visual evaluation must be graded as excellent, normal, or poor. The Permittee must take immediate corrective action whenever a poor result is encountered; and

(d) Samples of the scrubber water must be tested for total suspended solids on a quarterly basis.

M11. Lumber Drying Operations Monitoring and Emissions ADP 22-3511 Condition 42

This monitoring requirement applies to Requirements 21, 34, and 35.

The Permittee must record and maintain record of the amount, species, and final moisture content of lumber dried in the facilities' dry kilns on a monthly basis. The daily average dry bulb temperature of the dry kiln must be monitored continuously and averaged on a daily basis. Periods of non-operation should be recorded as such. Records must 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.

M12. Material Handling Operations Monitoring and Emissions WAC 173-401-615(1) ADP 22-3511 Conditions 39, 40

This monitoring requirement applies to Requirements 18 and 19.

The Permittee must record weekly the differential pressure across the Western Pneumatics baghouse filter media.

The Permittee must record monthly the hours of operation for the Western Pneumatics baghouse.

The Permittee must record for each occurrence the filter bag replacement and repair activities for the Western Pneumatics baghouse.

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

The Permittee must 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 must verify the equipment causing the emissions. The Permittee must 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.

M13. Hog Operations Monitoring and Emissions **WAC 173-401-615(1)**
ADP 22-3511 Condition 38

This monitoring requirement applies to Requirement 17.

The Permittee must record monthly the tons of wood material/logs processed through the hog.

The Permittee must 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 must verify the equipment causing the emissions. The Permittee must 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.

M14. Anti-stain Monitoring and Emissions **WAC 173-401-615(1)**
ADP 22-3511 Condition 43

This monitoring requirement applies to Requirement 22 and 37.

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

The Permittee must perform monthly inspections of affected operations 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 must verify the equipment causing the emissions. The Permittee must 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.

M15. Emergency Equipment Operations Monitoring and Emissions **WAC 173-401-615(1)**
WAC 173-400-075
40 CFR 63.6655
ADP 22-3511 Condition 44

This monitoring requirement applies to Requirements 23, 24, 38, 39, 40, 41, 42, 43, and 44.

The Permittee must record annually the hours of operation of the emergency propane engine and the fire pump diesel engine using a non-resettable hour meter. The Permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours were spent for non-emergency operation.

The Permittee must record for each fuel delivery the sulfur content of the fuel burned in the fire pump diesel engine. A fuel supplier certification or receipt may be used in lieu of actual fuel testing.

The Permittee must record for each occurrence any maintenance activities conducted on the engines. Activities that must be documented include, but are not limited to: oil and oil filter changes, air cleaner inspections, and inspection of hoses and belts.

The Permittee must 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 must verify the equipment causing the emissions. The Permittee must 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.

[§63.6655(e), (f) to Subpart ZZZZ of 40 CFR Part 63]

M16. Particulate Matter Emission Testing ADP 22-3511 Condition 47

This monitoring requirement applies to Requirements 11 and 18.

The Permittee must emission test particulate matter control equipment in accordance with the following schedule:

The Permittee must emission test the Western Pneumatics baghouse by the end of March 2015 and every five years thereafter, no later than the end of March. Emission testing must be conducted as specified in ADP 22-3511 Appendix C [found in Appendix C of this Permit]. Records of test results must be maintained in accordance with Condition M1 of this Permit.

M17. Lumber Drying Emission Testing ADP 22-3511 Condition 46

This monitoring requirement applies to Requirements 21.

The Permittee must conduct emissions testing on lumber drying operations in accordance with the following schedule:

The Permittee must emission test lumber drying for EU-4 by the end of February 2007 and every five years thereafter, no later than the end of February. If there is no test company capable of performing this test, SWCAA must be notified of the Permittee's attempt to locate a capable test facility. Emission testing must be conducted as specified in ADP 22-3511 Appendix B [found in Appendix B of this Permit]. Emission testing conducted more than three (3) months prior to the established due date above does not fulfill the affected testing requirement unless approved in advance by SWCAA. Records of test results must be maintained in accordance with Condition M1 of this Permit.

M18. Boiler Emission Testing ADP 22-3511 Condition 45

This monitoring requirement applies to Requirements 10 and 20.

The Permittee must conduct emissions testing on boiler operations in accordance with the following schedule:

(a) The ABCO Industries hog fuel boiler prior to October 2005 and every two years thereafter, no later than the end of October. Emission testing conducted more than three (3) months prior to the established due date above does not fulfill the affected testing requirement unless approved in advance by SWCAA. Emission testing must be conducted as specified in ADP 22-3511 Appendix A [found in Appendix A of this Permit].

Records of test results must be maintained in accordance with Condition M1 of this Permit.

M19. Boiler Emissions Monitoring **40 CFR Part 63 Section 11223**
ADP 22-3511 Condition 48

This monitoring requirement applies to Requirements 20.

The Permittee must conduct emissions monitoring (tune-up) on boiler operations in accordance with the following schedule:

(a) The ABCO Industries hog fuel boiler on a 12-month cycle, no later than the end of October. All emission monitoring must be conducted in accordance with ADP 22-3511 Appendix D [found in Appendix D of this Permit]. Emission monitoring is not required during any calendar year in which an emission test has been conducted in accordance with ADP 22-3511.

For 40 CFR Part 63:

(a) The Permittee must conduct a tune-up of the ABCO hog fuel boiler every five years as specified in §63.11223.

[§63.11223(c); Table 2(14) to Subpart JJJJJJ of 40 CFR Part 63]

M20. Greenhouse Gas Emission Monitoring **WAC 173-441-050**

This is a general monitoring requirement.

The permittee shall monitor greenhouse gas emissions by maintaining a record of applicable data elements specified in WAC 173-441-050(6)(a)-(h). Records shall be kept in a form suitable for expeditious inspection and review. Upon request, records required under this section must be made available to Ecology. Records may be retained offsite if the records are readily available for expeditious inspection and review. For records that are electronically generated or maintained, the equipment or software necessary to read the records shall be made available, or, if requested by Ecology, electronic records shall be converted to paper documents.

Affected monitoring systems must meet the applicable flow meter calibration and accuracy requirements of WAC 173-441-050(8). The accuracy specifications in that subsection do not apply where the use of company records (*defined in WAC 173-441-020(3)*) or the use of "best available information" is specified in an applicable subsection of WAC 173-441 to quantify fuel usage and/or other parameters.

Greenhouse gas emissions shall be calculated using the methodologies specified in relevant sections of WAC 173-441. The same calculation methodology shall be used throughout a reporting period unless a written explanation of why a change in methodology was required is provided.

VIII. 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. Pursuant to WAC 173-401-530(2)(c), reporting requirements are not applicable to IEUs unless specified.

Where a reporting schedule is specified (e.g., quarterly, semi-annual, or annual), compliance with the reporting frequency is met when reports are submitted more frequently than required.

Each report that is required to be submitted to the EPA must also be submitted to SWCAA by the deadline specified in the applicable requirement for that report. For submissions made electronically to an EPA database, the copy to SWCAA must be in a format approved by SWCAA. [WAC 173-401-615(3)]

All reports required by this Permit, and the supporting information for those reports, must be kept for a minimum period of no less than five years from the date of the report and must be maintained in a form readily available for inspection by SWCAA representatives. [WAC 173-401-615(2)(c)]

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

Southwest Clean Air Agency
5101 NE 82 Avenue, Suite 102
Vancouver, WA 98662

Clean Air Act Compliance Manager
US EPA Region 10, Mail Stop: OCE-101
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

R1. Deviations from Permit Conditions

WAC 173-401-615(3)(b)
SWCAA 400-107
ADP 22-3511 Condition 51

Deviations from permit requirements must 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 must be reported as soon as possible but no later than twelve hours after the deviation is discovered. Reports of deviations must include:

Deviations from permit condition reports must contain the following information: [WAC 173-401-615(3)(b)]

(a) Whether or not the deviation is or was due to upset conditions;
(b) The probable cause of the deviation; and

(c) The corrective action taken, and when the corrective action was initiated.

Excess emissions must be reported to SWCAA as soon as possible but no later than 48 hours after discovery in accordance with SWCAA 400-107. The Permittee must 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.

Excess emission reports must contain the following information: [SWCAA 400-107]

(a) Identification of the emission unit(s) involved;
(b) A brief description of the event including identification of known causes;
(c) Date, time and duration of the event;
(d) For exceedances of non-opacity emission limitations, an estimate of the quantity of excess emissions;
(e) Corrective action taken in response to the event; and
(f) Preventive measures taken or planned to minimize future recurrence.

R2. Complaint Reports **WAC 173-401-615(3)**

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

R3. Semi-annual Reports and CAM Excursions **40 CFR 64.9(a)(2)(i)**
WAC 173-401-615(3)
ADP 22-3511 Conditions 55-61

The Permittee must 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) A report on the status of all monitoring requirements of this Permit, consistent with WAC 173-401-615(3). Any deviation from permit requirements must be clearly identified.
(b) For all EPA Method 9 or SWCAA Method 9 monitoring conducted during the semi-annual period, a copy of the relevant opacity certification(s) must be submitted with the semi-annual report;
(c) Tons of wood material/logs processed through the hog;
(d) Hours of operation of the Western Pneumatics baghouse;
(e) Bone dry tons of chips, sawdust, shavings, and hog fuel loaded out from bunkers;
(f) For the ABCO Industries hog fuel boiler wet scrubber, malfunctions in flocculent delivery system, results of scrubber water quality evaluations, corrective action taken to improve wet scrubber water quality, pressure drop across the throat of the wet scrubber, wet scrubber water flow rate, and results of total suspended solids testing;

(g) Hours of operation, fuel consumption, excess oxygen, and steam production of the ABCO Industries hog fuel boiler;
(h) Cold start-up periods and hours of all start-ups for the ABCO Industries hog fuel boiler;
(i) Board feet of lumber dried, average daily temperature set point, moisture content of wood dried, and type of wood dried in the dry kilns for Hampton Lumber Mills, Morton;
(j) Amount of anti-stain used;
(k) Hours of operation for the office emergency propane engine and fire pump diesel engine;
(l) Summary of semi-annual emissions; and
(m) Upset conditions.

(n) Excursions from CAM indicator ranges must be included in the semi-annual report. The report must include the duration and cause of the excursion (if known), and the corrective actions taken in response to the excursion.

All required reports must be certified by a responsible official consistent with WAC 173-401-520. The reports must be either certified at initial submittal or each must be delineated and certified in the subsequent semi-annual report.

R4. Annual Reports **WAC 173-401-630(5)**
ADP 22-3511 Condition 62

(a) Annual Compliance Certification:
The Permittee must 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 must 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 must report the following to SWCAA annually by December 31st.

(i) The annual grate cleaning schedule for the ABCO Industries hog fuel boiler for the upcoming year.

R5. Emission Inventory Reports **WAC 173-400-105(1)**
SWCAA 400-105
ADP 22-3511 Condition 54

The permittee must submit an inventory of annual emissions each year to SWCAA by March 15th of the following year in accordance with SWCAA 400-105 unless an alternate date is approved by SWCAA. The inventory must include stack and fugitive emissions of NO_X, SO_2, CO, VOC, PM, PM_{10}, $PM_{2.5}$, lead, total reduced sulfur compounds, HAPs, and TAPs (*Local*) identified in WAC 173-460. Each inventory report must be certified by a responsible official consistent with WAC 173-401-520.

R6. Source Test Reports **WAC 173-401-615(3)**
SWCAA 400-106
ADP 22-3511 Condition 63, Appendices A, B, C

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

(a) A description of the source, including manufacturer, model number and design capacity of the equipment, and the location of the sample ports or test locations;
(b) Time and date of the test and identification and qualifications of the personnel involved;
(c) A summary of results, reported in units and averaging periods consistent with the applicable emission standard or limit with correction to the appropriate O_2 standard;
(d) A summary of control system or equipment operating conditions;
(e) A summary of production related parameters;
(f) A description of the test methods or procedures used, including all field data, quality assurance/quality control procedures and documentation;
(g) A description of the analytical procedures used, including all laboratory data, quality assurance/quality control procedures and documentation;
(h) Copies of field data and example calculations;
(i) Chain of custody information;
(j) Calibration documentation;
(k) Discussion of any abnormalities associated with the results;
(l) A statement signed by the senior management official of the testing firm certifying the validity of the source test report; and
(m) An electronic and a hard (paper) copy of the test report must be provided to SWCAA.

R7. Emission Monitoring (Tuning) Reports **WAC 173-401-615(3)**
SWCAA 400-106
ADP 22-3511 Condition 64, Appendix D

Reports of all required emission tuning or monitoring must be submitted to the Agency within 15 days of monitoring completion. Each report must include:

(a) A description of the emission unit including manufacturer, model number and facility designation;
(b) Time and date of the emissions evaluation;
(c) Identification of the personnel involved;
(d) Test "tapes" or other direct information generated by the monitoring equipment;
(e) All collected data, calculations, and final results, reported in units consistent with the applicable emission standard or limit;
(f) Final test result concentrations will be corrected to 7% O_2;
(g) A summary of control system or equipment operating conditions;
(h) A description of the evaluation methods or procedures used, including all field data, quality assurance/quality control procedures and documentation; and
(i) Calibration error checks documentation.

R8. MACT Records – Engine MACT (Subpart ZZZZ) **40 CFR 63.6650**

For each year in which the Permittee owns or operates a stationary reciprocating internal combustion engine (RICE) with a site rating of more than 100 brake horsepower (bhp) that operates for the purpose specified in §63.6640(f)(4)(ii), the Permittee must submit an annual report containing the annual hours of operation and under what purposes, as required by 40 CFR §63.6650(h). This notification is due no later than March 31st of the following calendar year. If operation for the purpose specified was not conducted, a report is not required.

R9. MACT Records – Area Boiler MACT (Subpart JJJJJJ) **40 CFR 63.11214, 11225**

The Permittee must submit an initial notification of applicability as required by 40 CFR 63.9.

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

(a) **Initial Notifications:** The Permittee must submit to the Administrator and SWCAA an initial notification no later than January 20, 2014, or within 120 days after the source becomes subject to the standard.

(b) **Notification of Compliance Status.**

(i) The Permittee must submit a signed statement that indicates that they have conducted an initial tune-up of the boiler.

(ii) The Permittee must submit a signed certification report that an energy assessment of the boiler and its energy use systems was completed according to Table 2 to 40 CFR 63 Subpart JJJJJJ and that the assessment 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.

[WAC 173-401-615(2); §63.9; §63.11214(b); §63.11214(c); §63.11225(a)(2) to Subpart JJJJJJ of 40 CFR Part 63]

IX. NON-APPLICABLE REQUIREMENTS

The following lists all federal, state, and/or local requirements that might reasonably apply to the Permittee but are deemed non-applicable 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.

N1. Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (Subpart Dc) 40 CFR 60.40c et seq.

Subpart Dc applies to all steam generation units for which construction, modification, or reconstruction is commenced after June 9, 1989, and that have a maximum design heat input between 10 million and 100 million Btu per hour. The hog fuel boiler at this source has a design heat input between 10 million and 100 million Btu per hour but was last modified prior to June 9, 1989. Therefore, this requirement is not applicable.

N2. 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.

N3. Compliance Assurance Monitoring 40 CFR Part 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 scrubber, therefore, only particulate matter from the boiler is potentially subject to CAM.

The planer mill baghouse controls particulate matter emissions from the planer mill. Testing was performed at the inlet to the planer mill baghouse and resulted in an average emission rate of 2.23 lb/hr. Based on the test results, the uncontrolled planer emissions are 9.8 tpy, assuming operation 8,760 hours per year. This is less than 100 tpy and, as a result, CAM requirements do not apply.

N4. Emission Standards for Combustion and Incineration Units SWCAA 400-050(3)

SWCAA 400-050(3) 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.

N5. Registration Program SWCAA 400-100(2)

The Permittee is an air operating permit source. Pursuant to SWCAA 400-100(1)(a)(ii) air operating permit sources are exempt from the registration requirements of SWCAA 400-100(2).

N6. Surface Coating MACT 40 CFR Part 63 Subpart QQQQ

The facility is not a HAP Major and is not subject to the Subpart QQQQ.

N7. 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.

N8. Plywood MACT CFR 40 CFR 63.46011 Subpart DDDD

The facility is not a HAP Major and is not subject to the Subpart DDDD.

N9. Major Boiler MACT CFR 40 Part 63.7480 Subpart DDDDD

The Hampton Lumber Mills—Washington, Inc.—Morton facility, together with its support facility, Hampton Drying Company, had a combined potential to emit in excess of 10 tons per year for several individual HAPs and greater than 25 tons per year for total HAPs. With the

shutdown of the Hampton Drying Company, the Morton facility's potential to emit is below the HAP major source thresholds. As a result, the Morton facility is no longer a HAP Major and is no longer subject to Subpart DDDDD.

N10. National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines 40 CFR Part 63.6580 et seq., Subpart ZZZZ

Subpart ZZZZ is applicable to the office emergency propane engine and the fire pump diesel engine. All applicable requirements of this regulation have been included as conditions of this Permit. The following discussion was included here because there is a reporting requirement of Subpart ZZZZ that might appear to be applicable to the emergency engines, but which SWCAA has determined is not applicable.

40 CFR 63.6650 infers that semi-annual compliance reports are required for existing emergency compression ignition (CI) engines with a site rating of less than 500 hp. However, all such reporting was removed from Table 7 (which summarized the requirements of this section) in an update of the rule on August 20, 2010 and 63.6650(a) directs that compliance reports must be submitted as indicated in Table 7 (which does not include reporting for existing emergency engines unless those engines operate or are contractually obligated to be available more than 15 hour/year for the purposes specified in §63.6640(f)(2)(ii) and (iii) or for the purposes specified in §63.6640(f)(4)(ii)). It would seem inappropriate to require emergency engines subject to no numeric emission or operating limit (and which do not operate and are not contractually obligated to be available for more than 15 hour/year for any of the specific purposes giving rise to a compliance report per Table 7) to submit semi-annual compliance status reports. Further evidence that EPA did not intend to impose semi-annual compliance reporting on these engines can be found in EPA's response to comments on the proposed rule. In a memorandum dated February 17, 2010, from Melanie King to EPA Docket EPA-HQ-OAR-2008-0708, EPA wrote:

"EPA agrees with the commenter that semi-annual compliance reporting, and other types of reporting required under the General Provisions of 40 CFR Part 63 are not appropriate for area sources that are not subject to numerical emission standards. EPA believes that recording information and maintaining records will provide EPA with assurance that facilities are meeting the work/management practices and other requirements applicable to their existing stationary engines. Further, EPA believes it is appropriate [to] extend the same approach to any sources that are not subject to numerical emission standards, including existing stationary CI engines less than 100 HP and existing stationary emergency CI engines…"

For the reasons described above, SWCAA had determined that the semi-annual compliance reporting described in 40 CFR 63.6650 is not applicable to the emergency engines.

N11. Standards of Performance for Stationary Compression Ignition Internal Combustion Engines 40 CFR Part 60.4200 et seq., Subpart IIII

Subpart IIII applies to each CI internal combustion engine (ICE) that is manufactured after 2007 with displacements less than 30 liters percylinder, commenced construction after July 11, 2005, and is manufactured after April 1, 2006, or is modified or reconstructed after July 11, 2005. This subpart does not apply to the fire pump engine because the engine was manufactured prior to the applicability date.

N12. Standards of Performance for Stationary Spark Ignition Internal Combustion Engines 40 CFR 60.4230 et seq., Subpart JJJJ

Subpart JJJJ requires that new spark ignition (SI) ICE meet specific emission standards at the point of manufacture and during the operating life of the engine. In addition, this subpart imposes operating and recordkeeping requirements on owners and operators. This subpart applies to emergency engines with a maximum engine power greater than 25 hp manufactured after January 1, 2009. This subpart does not apply to the office emergency generator engine because the engine was manufactured prior to the applicability date.

N13. Chemical Accident Prevention Provisions 40 CFR 68.130

Under the authority of section 112(r) of the Clean Air Act, the Chemical Accident Prevention Provisions require facilities that produce, handle, process, distribute, or store certain chemicals to develop a Risk Management Program, prepare a Risk Management Plan (RMP), and submit the RMP to EPA. Covered facilities were initially required to comply with the rule in 1999, and the rule has been amended on several occasions since then, most recently in 2004. The facility does not produce, handle, process, distribute, or store the chemicals listed in 40 CFR 68.130. Therefore, this requirement is not applicable.

N14. Prevention of Significant Deterioration 40 CFR 52.21

Hampton Lumber Mills – Morton was not subject to the PSD program upon initial new source review (NSR) permitting. The facility received its permit January 13, 1978, and 40 CFR 52.21(i) states [in the June 19, 1978, Federal Register] that the paragraphs (j) through (r) of this subsection must not apply to a major stationary source…if the owner obtained final approval before March 1, 1978. Therefore, PSD was not applicable. The facility does not have a PSD permit and has not made any modifications to SWCAA's knowledge that have resulted in a significant increase in emissions. Therefore, PSD has not been triggered since the initial NSR permitting action.

N14. Greenhouse Gas Reporting (Federal) 40 CFR 98

40 CFR 98 establishes mandatory reporting requirements for greenhouse gas (GHG) emissions from selected stationary source categories in the United States that emits 25,000 metric tons CO_2e or more per year. Pursuant to 40 CFR 98.3, facilities subject to this regulation must submit GHG emissions reports to the Administrator, as specified in paragraphs (a) through (g) of that section, for calendar year 2010 and each subsequent calendar year. This regulation was proposed on April 10, 2009 (74FR16609) and finalized on September 22, 2009. In the preamble of the

final promulgation, EPA responded to a question regarding whether the reporting requirements constitute an applicable requirement for the purposes of Title V. The response indicates that the reporting requirements are not an applicable requirement for the purposes of Title V.

As currently written, the definition of "applicable requirement" in 40 CFR 70.2 and 71.2 does not include a monitoring rule such as today's action, which is promulgated under CAA sections 114(a)(1) and 208.
http://www.epa.gov/climatechange/emissions/ghgrulemaking.html

N15. Clean Air Rule **WAC 173-442**

This rule establishes GHG emissions standards starting in 2017 for selected stationary sources, petroleum product producers and importers, and natural gas distributors. WAC 173-442 was subsequently preempted by the Climate Commitment Act. Ecology has been directed to repeal the regulation (*RCW 70A.65.200(9)(c)*). Therefore, requirements from the regulation have not been incorporated into this Permit.

APPENDIX A

Emission Testing Requirements – ABCO Boiler

1. Background:

The purpose of this testing is to quantify emissions from the ABCO hog fuel boiler and wet scrubber, and to demonstrate compliance with the requirements of this ADP and applicable air quality regulations.

2. Testing Requirements:

a. **Test plan.** A comprehensive test plan must be submitted to SWCAA for review and approval at least ten (10) business days prior to each test. SWCAA personnel must be informed at least five (5) business days prior to testing so that a representative may be present during testing.

b. **Testing schedule.** An emission test must be conducted at the exhaust stack of the wet venturi scrubber for the boiler no later than the end of October 2005. Subsequent emission testing must be conducted every two (2) years by the end of October.

c. **Test runs/Reference test methods.** A minimum of three (3) test runs must be performed for each constituent listed below to ensure the data are representative. Compliance must be demonstrated by averaging the results of the individual sampling runs. The sampling methods and schedules must be used unless alternate methods or test schedules are approved in writing by SWCAA in advance of the emission testing.

Constituent	Reference Test Method	Minimum Test Run Duration
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
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 must be recorded during emission testing to correlate operating conditions with emissions. Recorded parameters must, at a minimum, include:

APPENDIX A

Emission Testing Requirements – ABCO Boiler

3. Source Operation: (cont.)

(1) Boiler steam production rate,
(2) Fuel type/mixture description,
(3) Wet scrubber pressure drop,
(4) Wet scrubber flow rate,
(5) Boiler meter oxygen percent,
(6) Process start-ups and shutdowns, and
(7) Plant adjustments.

4. Reporting Requirements:

a. A final emission test report must be prepared and submitted to SWCAA within 45 calendar days of test completion. Unless otherwise directed by SWCAA, each report must be provided in an electronic format acceptable to SWCAA and as a hard (paper) copy. Each report must include:
   (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 including but not limited to: ppmv, lb/hr, lb/1,000 lb steam, and lb/MMBtu.
   (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. All test results, as applicable, must be corrected to 7% oxygen and 3% oxygen.

5. Changes to Testing Requirements:

The source test must be conducted as specified in the sections above. The Permittee may submit a written request to SWCAA for approval of minor modifications to the requirements above or the testing schedule. Upon review of the request and in accordance with EPA delegation, SWCAA will inform the Permittee in writing of any approved modifications.

APPENDIX B

Emission Testing Requirements – Lumber Drying

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

2. Testing Requirements:

a. **Testing schedule.** Emission testing of the lumber drying process must be conducted no later than February 2007. Subsequent emission testing must be conducted on a five-year cycle, no later than the end of February. If there is no test company capable of performing this test, SWCAA must be notified of the Permittee's attempt to locate a capable test facility. If no test firm can be located, the test is excused until the next five-year interval. Unless otherwise directed by SWCAA, the testing must be conducted on the dominant species dried at the facility.

b. **Test plan.** A comprehensive test plan must be submitted to SWCAA for review and approval at least ten business days prior to each test. SWCAA personnel must be informed at least five (5) 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 must be used unless alternate methods or test schedule are approved in writing by SWCAA in advance of the emission testing.

Constituent	Reference Test Method	Minimum Test[1] Run Duration
Exhaust Flow	EPA Methods 1-4	See footnote 1
Volatile organic compounds[2]	EPA Method 25A / 18 or 320	
Methanol	NCASI Method 105 or EPA Method 320	
Ethanol	NCASI Method 105 or EPA Method 320	
Formaldehyde	NCASI Method 105 or EPA Method 320	
Acetaldehyde	NCASI Method 105 or EPA Method 320	
Acrolein	NCASI Method 105 or EPA Method 320	
Propionaldehyde	NCASI Method 105 or EPA Method 320	
Acetic Acid	NCASI Method 105[3] or EPA Method 320	

[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 (2) but less than seven (7) days prior to the commencement of testing;
(4) The lumber must be maintained below 10°F if stored for seven (7) 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 forty-five (45) calendar days of test completion. Unless otherwise directed by SWCAA, each report must be provided in an electronic format acceptable to SWCAA and as a hard (paper) copy. Each report must 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 unspeciated fraction of the VOC emissions must be assumed to be monoterpenes ($C_{10}H_{16}$).

5. Changes to Testing Requirements:
The source test must be conducted as specified in the sections above. The Permittee may submit a written request to SWCAA for approval of minor modifications to the requirements above or the testing schedule. Upon review of the request and in accordance with EPA delegation, SWCAA will inform the Permittee in writing of any approved modifications.

APPENDIX C

Emission Testing Requirements – Western Pneumatics Baghouse

1. Introduction:

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

2. Testing Requirements:

a. **Test plan.** A comprehensive test plan must be submitted to SWCAA for review and approval at least ten (10) business days prior to each test. SWCAA personnel must be informed at least five (5) business days prior to testing so that a representative may be present during testing.

b. **Testing schedule.** Testing must be performed by March 2015. Subsequent emission testing must be conducted once every five (5) years thereafter, no later than the end of March.

a. **Test runs/Reference test methods.** A minimum of three (3) test runs at maximum intended operating conditions for a minimum of one hour must be performed for each constituent listed below to ensure the data are representative. Compliance must be demonstrated by averaging the results of the individual sampling runs. The sampling methods and schedules must be used unless alternate methods or test schedules are approved in writing by SWCAA in advance of the emission testing.

Constituent	Reference Test Method	Minimum Test Run Duration
PM (filterable)	EPA Method 5 or EPA Method 17 or ODEQ Method 8	60 minutes
Opacity	SWCAA Method 9	6 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 must be recorded during emissions testing to correlate operating conditions with emissions. Recorded parameters must, at a minimum, include process start-ups and shutdowns, baghouse pressure drop, and plant adjustments. 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 forty-five (45) calendar days of test completion. Unless otherwise directed by SWCAA, each report must be provided in an electronic format acceptable to SWCAA and as a hard (paper) copy. Each report must 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 C

Emission Testing Requirements – Western Pneumatics Baghouse

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: gr/dscf and lb/hr.
(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. Results must be reported as measured with no O_2 correction.

5. Changes to Testing Requirements:
The source test must be conducted as specified in the sections above. The Permittee may submit a written request to SWCAA for approval of minor modifications to the requirements above or the testing schedule. Upon review of the request and in accordance with EPA delegation, SWCAA will inform the Permittee in writing of any approved modifications.

APPENDIX D

Emission Monitoring Requirements – ABCO Boiler

1. Background:

The purpose of emission monitoring ("tuning") is to quantify emissions from the hog fuel boiler, provide a basis to adjust the boiler as necessary to minimize emissions, and to provide a reasonable assurance that the boiler is operating properly.

2. Test Constituents and Test Methods:

(a) Oxygen (O_2) using a calibrated portable combustion analyzer or EPA Methods 3 or 3A;
(b) Nitrogen oxides (NO_x) using a calibrated portable combustion analyzer or EPA Method 7E; and
(c) Carbon monoxide (CO) using a calibrated portable combustion analyzer or EPA Method 10.

Combustion analyzers include electrochemical cell combustion analyzers, analyzers used for reference method testing, or other analyzers pre-approved by SWCAA.

3. Tuning Requirements:

(a) Dates. Monitoring must be conducted no later than the end of October 2004. Subsequent emission monitoring must be conducted on a 12-month cycle, no later than the end of October. Monitoring is not required during any calendar year in which an emission test has been conducted in accordance with Appendix A.
(b) Source Operation. Boiler operation during the emissions test must be representative of current intended operating conditions.
(c) Data Collection.
  (1) Sampling must consist of at least one (1) test consisting of at least five (5) minutes of data collection following a "ramp-up phase." The ramp-up phase ends when analyzer readings have stabilized (less than 5% per minute change in emission concentration). Emission concentrations must be recorded at least once every thirty (30) seconds during the data collection phase. All test data collected following the ramp-up phase must be reported to SWCAA.
  (2) The analyzer(s) response to span gas of a known concentration must be determined before and after testing. No more than twelve (12) hours may elapse between span gas response checks. The results of the analyzer response will not be valid if the pre and post response check results vary by more than 10% of the known span gas value.
  (3) The CO and NO_x span gas concentrations must be no less than 50% and no more than 200% of the emission concentration corresponding to the permitted emission limit. A lower concentration span gas may be used if it is more representative of measured concentrations. Ambient air may be used to zero the CO and NO_x cells/analyzer(s) and span the oxygen cell/analyzer.

APPENDIX D

Emission Monitoring Requirements – ABCO Boiler

4. Tuning Requirements: (cont.)

(4) If the monitoring results from any monitoring event indicate that emission concentrations exceed the permitted emission limits for the unit, the Permittee must either perform sixty (60) minutes of additional monitoring to more accurately quantify CO and NO_x emissions, or initiate corrective action. Additional monitoring or corrective action must be initiated as soon as practical but no later than three (3) calendar days after the exceedance is identified. Corrective action includes tuning, maintenance by service personnel, limitation of unit load, or other action taken to maintain compliance with permitted limits. Monitoring of unit emissions must be conducted within three (3) calendar days following completion of any corrective action to confirm that the corrective action has been effective. Initiation of corrective action does not shield the Permittee from enforcement.

5. Reporting Requirements:

Monitoring results must be reported to SWCAA within fifteen (15) calendar days of monitoring completion. The average of the results of each run is evaluated against the requirements of ADP 22-3511. Results must be submitted on forms provided by SWCAA or in an alternative format previously approved by SWCAA. The report must include the following information:

(a) A description of the emission unit including manufacturer, model number and facility designation;
(b) Time and date of the emissions evaluation;
(c) Identification of the personnel involved;
(d) Test "tapes" or other direct information generated by the monitoring equipment;
(e) All collected data, calculations, and final results, reported in units consistent with the applicable emission standard or limit;
(f) Final test result concentrations will be corrected to 7% O_2;
(g) A summary of control system or equipment operating conditions;
(h) A description of the evaluation methods or procedures used, including all field data, quality assurance/quality control procedures and documentation; and
(i) Calibration error checks documentation.

6. Changes to Requirements:

Monitoring must be conducted as specified in the sections above. The Permittee may submit a written request to SWCAA for approval of minor modifications to the requirements above or the monitoring schedule. Upon review of the request and in accordance with EPA delegation, SWCAA will inform the Permittee in writing of any approved modifications.

APPENDIX E

Scrubber Water Visual Evaluation Method

JUN 26 '97 11:18 STEAM ENGINEERING IN P.1/1

Steam Engineering
INCORPORATED

June 26, 1997

Heinz Dettinger
202 S.W. 16th Court
Troutdale, OR 97060

Dear Heinz:

The flocculents Steam Engineering is using at the Cowlitz Stud plants in Morton and Randal are #4910 and #4950 respectively. They are used at the scrubbers to facilitate solids separation and settling from the water to aid in clarification of the water.

A test for performance of the flocculent is performed by collecting approximately a liter (or quart) of the surface water in the scrubber pond and then noting the following:

* If 80% settles in 30 seconds, the flocculent performance is excellent.
* If 80% settles in 60 seconds, the flocculent performance is good.
* If 80% settles in 5 minutes, the flocculent performance is poor.

If you have any further questions, please feel free to call me.

Sincerely,

Dave

Dave Volpe

DV/mlw

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JUN 30 1997
SOUTHWEST AIR POLLUTION
CONTROL AUTHORITY

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800-346-6152 or (503) 644-8655