



Air Operating Permit

Issued in accordance with:
40 CFR Part 70, Chapter 70.94
RCW, and Chapter 173-401 WAC

3104 E. Augusta, Spokane, WA 99207 (509) 477- 4727

PERMIT NO: AOP-1 RENEWAL #3

ISSUANCE DATE: OCTOBER 23, 2013

EXPIRATION DATE: OCTOBER 22, 2018

PERMITTEE: Inland Empire Paper Company
3320 N Argonne
Spokane, WA 99212-2099

FACILITY LOCATION: 3320 N Argonne
Spokane, WA 99212-2099

FACILITY DESCRIPTION: Newsprint Paper Mill

PRIMARY SIC: 2621

AIRS AFS NO: WA-063-0092

RESPONSIBLE OFFICIAL: Kevin D. Rasler
President & General Manager

FACILITY CONTACT: Douglas P. Krapas
Environmental Manager
(509) 924-1911

PREPARED BY: _____
Joe R. Southwell

REVIEWED BY: _____
April L. Westby, PE

APPROVED BY: _____
William Dameworth, Control Officer

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LIST OF ABBREVIATIONS

BACT	Best available control technology
CFR	Code of Federal Regulations
CO	Carbon monoxide
dba	Doing business as
dscf	Dry standard cubic foot
ECOLOGY	Washington State Department of Ecology
EPA	United States Environmental Protection Agency
FCAA	Federal Clean Air Act
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous air pollutant as designated under Title III of FCAA
MMBTU	Millions of British thermal units
MRRR	Monitoring, recordkeeping, & reporting requirements
NAA	Nonattainment area
NOC	Notice of Construction
NOx	Oxides of nitrogen
O2	Oxygen
O&M	Operation & maintenance
Pb	Lead
PM	Particulate matter
PM-10	Particulate matter, 10 microns or less in size
PSD	Prevention of Significant Deterioration
RACT	Reasonably available control technology
RCW	Revised Code of Washington
RM	EPA reference method from 40 CFR Part 60, Appendix A
scf	Standard cubic foot
SO2	Sulfur dioxide
SOx	Oxides of sulfur
SRCAA	Spokane Regional Clean Air Agency
VOC	Volatile organic compounds
WAC	Washington Administrative Code

DEFINITIONS OF WORDS & PHRASES

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

Administrator	The administrator of the United States Environmental Protection Agency or her/his designee [WAC 173-401-200(12), 8/10/11]
Chapter 401 Permit	Any permit or group of permits covering a source, subject to the permitting requirements of Chapter 173-401 WAC, that is issued, renewed, amended, or revised pursuant to Chapter 173-401 WAC [WAC 173-401-200(5), 8/10/11]
Emission Limitation	A requirement established under the FCAA or Chapter 70.94 RCW which limits the quantity, rate or concentration of emissions of air contaminants on a continuous basis, including any requirement relating to the operation or maintenance of a source to assure continuous emission reduction and any design, equipment work practice, or operational standard promulgated under the FCAA or Chapter 70.94 RCW [WAC 173-400-030(27), 11/28/12]
Emissions Unit	Any part of a stationary source or source which emits or would have the potential to emit any pollutant subject to regulation under the Federal Clean Air Act, Chapter 70.94 RCW, or 70.98 RCW [WAC 173-400-030(29), 11/28/12]
Federal Clean Air Act	Federal Clean Air Act, also known as Public Law 88-206, 77 Stat. 392. December 17, 1963, 42 U.S.C. 7401 et seq., as last amended by the Clean Air Act Amendments of 1990, P.L. 101-549, November 15, 1990 [WAC 173-401-200(13), 8/10/11]
Opacity	The degree to which an object seen through a plume is obscured, stated as a percentage [WAC 173-400-030(58), 11/28/12]
PM Standard	An emission limitation on the amount of particulate matter an emissions unit may emit, generally expressed in terms of grains per dry standard cubic foot, pounds per hour, or some other concentration or emission rate.
Visible Emissions Standard	An emission limitation on visible emissions expressed in percent opacity

The following note applies throughout this permit when indicated by the term “* - see note on page 5.”

NOTE: For requirements which are federally enforceable because of inclusion in the State Implementation Plan (SIP), where the current filing date in the regulation is different from the filing date for SIP approved version, but the requirement itself has not changed, the most recent filing date is given, followed by the SIP version in parentheses.

Until this permit expires, is modified, or revoked, the permittee, Inland Empire Paper Company (IEPC), is authorized to operate subject to the terms and conditions listed herein.

I. STANDARD TERMS & CONDITIONS

A. PERMIT ADMINISTRATION

I.A.1. Federal Enforceability. All terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the FCAA except those terms or conditions not required under the FCAA or under any of its applicable requirements and specifically so designated. All terms and conditions that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are not enforceable by EPA or citizens under the FCAA. [WAC 173-401-625, 10/4/93]

I.A.2. Duty to comply. The permittee shall comply with all terms and conditions of this Chapter 401 permit. Any permit noncompliance shall constitute a violation of Chapter 70.94 RCW, and for federally enforceable provisions, a violation of the Federal Clean Air Act. Such violations are grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [WAC 173-401-620(2)(a), 10/4/93]

I.A.3. Schedule of Compliance. The permittee will continue to comply with all applicable requirements with which the source is in compliance. The permittee will meet, on a timely basis, any applicable requirements that become effective during the permit term. [WAC 173-401-630(3), 10/4/93]

I.A.4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the 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. [WAC 173-401-620(2)(b), 10/4/93]

I.A.5. 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. [WAC 173-401-620(2)(c), 10/4/93]

I.A.6. Reopening for Cause. The permit shall be reopened and revised under any of the following circumstances:

- a. Additional requirements become applicable to the facility and the remaining permit term is three or more years. Such reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. Such reopening is not required if the effective date of the new requirement is later than the date on which this permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j). (See Condition A.15- Permit Continuation below);
- b. SRCAA or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
- c. SRCAA or the Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

[WAC 173-401-730, 10/4/93]

I.A.7. Emissions Trading. No permit revision shall be required, under any approved, economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit. [WAC 173-401-620(2)(g), 10/4/93]

I.A.8. Property Rights. This permit does not convey any property rights of any sort, or any exclusive privilege. [WAC 173-401-620(2)(d), 10/4/93]

I.A.9. Duty to provide information. The permittee shall furnish within a reasonable time to SRCAA, any information that SRCAA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to SRCAA copies of records required to be kept by the permit or, for information claimed confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. SRCAA shall maintain confidentiality of such information in accordance with RCW 70.94.205. [WAC 173-401-620(2)(e), 10/4/93]

I.A.10. Duty to Supplement or Correct Application. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit. [WAC 173-401-500(6), 9/16/02]

I.A.11. Permit Fees. The permittee shall pay fees as a condition of this permit in accordance with Spokane Regional Clean Air's fee schedule. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in Chapter 70.94 RCW. [WAC 173-401-620(2)(f), 10/4/93]

I.A.12. Severability. If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable. [WAC 173-401-620(2)(h), 10/4/93]

I.A.13. 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 SRCAA within thirty days of receipt pursuant to RCW 43.21B.310. This provision for appeal is separate from, and additional to, any federal rights to petition and review under §505(b) of the FCAA, including petitions filed pursuant to 40 CFR 70.8(c) and 70.8(d). [WAC 173-401-620(2)(i), 10/4/93] [WAC 173-401-735(1), 4/2/97]

I.A.14. Permit Renewal and Expiration. This permit shall be in effect for five years from the date of issuance as indicated on the cover page. The permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete application for renewal is submitted to SRCAA at least 12 months, but no more than 18 months, prior to the date of permit expiration. Upon SRCAA's receipt of a timely and complete application, the facility may continue to operate subject to final action by Spokane Regional Air Agency on the application. This protection shall cease to apply if, subsequent to a completeness determination, the applicant fails to submit, by the deadline specified in writing by SRCAA, any additional information identified as necessary to process the application. The application shall be sent to:

Director
Spokane Regional Clean Air Agency
3104 E. Augusta
Spokane WA 99207

[WAC 173-401-610, 10/4/93] [WAC 173-401-705, 10/4/93] [WAC 173-401-710(1), 9/16/02]

I.A.15. Permit Continuation. This permit and all terms and conditions contained herein, including any permit shield provided under Condition A.16-Permit Shield and Section III. PERMIT SHIELD, shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect until the renewal permit has been issued or denied if a timely and complete application has been submitted. [WAC 173-401-620(2)(j), 10/4/93]

I.A.16. Permit Shield. Compliance with a permit condition is deemed compliance with the applicable requirements upon which that condition is based, as of the date of permit issuance, provided such applicable requirements are included and are specifically identified in the permit. This provision does not apply to any insignificant emissions units or activities designated under WAC 173-401-530.

This permit shield shall not alter or affect the following:

- a. the provisions of Section 303 of the FCAA (emergency orders), including the authority of the Administrator under that section;
- b. the liability of the permittee for any violation of applicable requirements prior to or at

the time of permit issuance;

c. the ability of EPA to obtain information from the permittee pursuant to Section 114 of the FCAA;

d. the ability of SRCAA to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in Chapter 252, Laws of 1993.

[WAC 173-401-640(1) & (4), 10/4/93]

(See Section III. PERMIT SHIELD for requirements that have been deemed inapplicable to this facility.)

B. INSPECTION & ENTRY

I.B.1. Inspection and Entry. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow SRCAA, or an authorized representative, to perform the following:

a. enter upon the permittee's premises where a chapter 401 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;

b. have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

d. as authorized by WAC 173-400-105 and the FCAA, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements.

[WAC 173-401-630(2), 10/4/93] [NOC #1169, Condition 16, 12/30/03 as revised on 3/29/04, 6/10/05, 7/13/06, and 7/9/08] [NOC #1321, Condition 9, 12/21/05] [NOC #1096, Condition 7, 10/19/01, as revised on 4/16/02 and 6/7/05] [NOC #1250, Condition 6, 1/13/05] [NOC #1463, Condition 9, 8/13/09] [SRCAA Regulation I, Section 2.02.E&F, 3/4/04 – STATE/LOCAL ONLY]

Nothing in this condition shall limit the ability of EPA to inspect or enter the premises of the permittee under Section 114 of the FCAA. [WAC 173-401-640(4)(d), 10/4/93]

I.B.2. Obstruction of Access. No person shall obstruct, hamper, or interfere with any authorized representative of SRCAA who requests entry for the purpose of inspection, and who presents appropriate credential; nor shall any person obstruct, hamper or interfere with any

such inspection. [RCW 70.94.200, 1998 - STATE/LOCAL ONLY] [SRCAA Regulation I, Article II, Section 2.02E&F, 3/4/04 –STATE/LOCAL ONLY]

C. EMERGENCY PROVISIONS

I.C.1. Emergencies. An emergency, as defined in WAC 173-401-645(1), constitutes an affirmative defense to an enforcement action for non-compliance with a technology-based emission limitation if all the conditions of WAC 173-401-645(3) and (4) are met and the permittee submits notification of the emergency to SRCAA in accordance with Condition I.D.7-Prompt Reporting of Deviations and submits a report in accordance with Condition I.C.4-Emergency, Excess Emissions, Upset Conditions and/or Breakdown Reports below.

This provision is in addition to the affirmative defense for unavoidable excess emissions found in Condition I.C.2-Excess Emissions and Condition I.C.3-Report of Breakdown below. [WAC 173-401-645, 10/4/93] [WAC 173-401-615(3)(b), 9/16/02]

I.C.2. Excess Emissions. If excess emissions due to startup or shutdown conditions, scheduled maintenance, or upsets are determined to be unavoidable under the procedures and criteria in WAC 173-400-107 (until the effective date of EPA's incorporation of WAC [173-400-108](#) and [173-400-109](#) into the Washington state implementation plan) or WAC 173-400-108 and WAC 173-400-109 (on and after the effective date of EPA's incorporation of WAC [173-400-108](#) and [173-400-109](#) into the Washington state implementation plan), such emissions are violations of the applicable statute, regulation, permit, or regulatory order but are not subject to penalty. The permittee shall submit a notification of the excess emissions in accordance with Condition I.D.7-Prompt Reporting of Deviations below, and upon request by SRCAA, submit a report in accordance with Condition C.5-Emergency, Excess Emissions, Upset Conditions and/or Breakdown Reports below. [WAC 173-400-107, 108, 109, 3/1/11] [WAC 173-401-615(3)(b), 9/16/02]

I.C.3. Report of Breakdown for State/Local Only Requirements in SRCAA Regulation I. If pollutants are emitted in excess of the limits established by SRCAA Regulation I as a direct result of unavoidable upset conditions or unavoidable and unforeseeable breakdown of equipment or control apparatus, SRCAA may excuse the permittee from penalties if the permittee submits a notification of the breakdown is reported in accordance with Condition I.D.7-Prompt Reporting of Deviations below and upon request by SRCAA's control officer, submits a report in accordance with Condition I.C.4-Emergency, Excess Emissions, Upset Conditions and/or Breakdown Reports.

The control officer, upon receipt of a report from the permittee describing a breakdown, may:

- a. Allow operation exempt from penalties, but only for a limited time period, after which the permittee will be required to comply with SRCAA Regulation I or be subject to the penalties in SRCAA Regulation I, Section 2.11. Such an exemption may be withdrawn if the exempt operation becomes a cause of complaints; or

- b. Require that the permittee curtail or cease operations until repairs are completed if the quantity of pollutants or the nature of the pollutants could cause damage.

Note: This provision does not provide relief against federally enforceable applicable requirements. [SRCAA Regulation I, Section 6.08, 3/4/04- STATE/LOCAL ONLY]

I.C.4. Emergency, Excess Emissions, Upset Conditions and/or Breakdown Reports. In the event of emergencies, excess emissions, upset conditions, and/or breakdowns (see Conditions I.C.1, I.C.2, & I.C.3 above), if requested by SRCAA, or if required under an applicable requirement, the permittee shall submit a full written report including:

- a. Date, time, and duration of the event,
- b. Known causes of the event;
- c. Records documenting the permittee's actions in response to the excess emissions event;
- d. Steps taken to repair the breakdown, if applicable, including a schedule to complete the repairs;
- e. Corrective actions taken, including preventative measures to be taken to minimize or eliminate the chance of recurrence;
- f. Information on whether emission monitoring and pollution control systems were operating at the time of the exceedance. If either or both systems were not operating, information on the cause and duration of the outage; and
- g. All additional information required under WAC 173-400-107 (until the effective date of EPA's incorporation of WAC [173-400-108](#) and [173-400-109](#) into the Washington state implementation plan) or WAC 173-400-109 (on and after the effective date of EPA's incorporation of WAC [173-400-108](#) and [173-400-109](#) into the Washington state implementation plan) supporting the claim that the excess emissions were unavoidable.

[WAC 173-401-615(3)(b), 9/16/02] [WAC 173-400-107, 108, 109, 3/1/11] [SRCAA Regulation I, Section 6.08, 3/4/04 – STATE/LOCAL ONLY]

D. GENERAL MONITORING, RECORDKEEPING, & REPORTING

I.D.1. Records of Required Monitoring Information. The permittee shall keep records of monitoring information including:

- a. the date, place as defined in this permit, and time of sampling and measurements;
- b. the date(s) analyses were performed;
- c. the company or entity that performed the analyses;

- d. the analytical techniques or methods used;
- e. the results of such analyses; and
- f. the operating conditions existing at the time of sampling or measurement.

[WAC 173-401-615(2)(a), 9/16/02]

I.D.2 Permanent Shutdown of an Emission Unit. If an emission unit is permanently shut down, thereby rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the shutdown, to meet any monitoring, recordkeeping, and reporting requirements, no longer applicable for that emission unit, once any residual requirements have been met. All records, relating to the shutdown of an emission unit, generated while the emission unit was in operation, shall be kept in accordance with Conditions I.D.1- Records of Required Monitoring Information and I.D.5 – Retention of Records.

Contemporaneous with the shutdown of the emission unit, the permittee shall record the date that operation of the emission unit ceased, using a log or file on site. The shutdown date shall be reported to SRCAA on the monitoring report, required under Condition I.D.6 – Monitoring Reports, covering the period during which the shutdown occurred. [WAC 173-401-725(4)(a), 10/4/93] [WAC 173-401-650(1)(a), 10/4/93]

I.D.3. Operational Flexibility. In the event that an emission unit is not operated during a period equal to or greater than the monitoring period designated, no monitoring is required. Recordkeeping and reporting must note the reason why and length of time that the emission unit was not operated. [WAC 173-401-650(1)(a), 10/4/93]

I.D.4. Records of Changes. The permittee shall keep records of changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. [WAC 173-401-615(2)(b), 9/16/02]

I.D.5. Retention of Records. The permittee shall keep records of all required monitoring data and support information for a period of five years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. [WAC 173-401-615(2)(c), 9/16/02]

I.D.6. Monitoring Reports. Unless a shorter time period is specified by this permit, reports of any required monitoring shall be submitted to SRCAA as follows:

- Monitoring report covering the period from January 1 – June 30 each year shall be submitted to SRCAA and postmarked no later than July 30 of the same calendar year; and
- Monitoring report covering the period from July 1 – December 31 each year shall be submitted to SRCAA and postmarked no later than April 15 of the following calendar year.

The reports shall be certified as required in Condition I.D.11-Report Submittals. Provided, where this permit 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. The report shall include the following information for the reporting period:

- a. A summary of monitoring results;
- b. Clear identification of all instances of deviations from permit requirements; and
- c. Any permanent emission unit shutdowns and 27-Permanent Shutdown of an Emission Unit, respectively.

[WAC 173-401-615(3)(a), 9/16/02] [WAC 173-401-615(1) & (2), 9/16/02]

I.D.7. Prompt Reporting of Deviations. The permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventative measures taken. Prompt means reporting according to the shortest time period listed below which applies to the situation:

- a. In the case where the deviation represents a potential threat to human health or safety, the deviation shall be reported by phone or facsimile as soon as possible, but no later than 12 hours after the deviation is discovered;
- b. In the case where an affirmative defense is sought under Condition I.C.1 - Emergencies ,or under Condition I.C.2 - Excess Emissions, or Condition I.C.3 – Report of Breakdown, the deviation shall be reported on the next regular working day; and
- c. For all other deviations, the deviation shall be reported as part of the next monitoring report, or no later than 30 days after the end of the month during which the deviation is discovered, whichever is sooner.

The permittee shall maintain a contemporaneous record of all deviations. [WAC 173-401-615(3)(b), 9/16/02] [WAC 173-401-645(3)(d), 10/4/93] [WAC 173-107(3), 3/1/11] [SRCAA Regulation I, Section 6.08.A.1, 3/4/04 –STATE/LOCAL ONLY]

I.D.8. Emission Inventory. The permittee shall submit an inventory of emissions from the source each year. The inventory shall include stack and fugitive emissions of particulate matter, PM10, sulfur dioxide, carbon monoxide, total reduced sulfur compounds, fluorides, lead, volatile organic compounds, and other contaminants, and shall be submitted no later than one hundred five days after the end of the calendar year. The permittee shall maintain records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards. [WAC 173-400-105(1), 8/20/93] [WAC 173-400-105(1), 11/28/12 – STATE/LOCAL ONLY]

I.D.9. Reporting of Emissions of Greenhouse Gases. The permittee shall comply with the applicable requirements given in Chapter 173-441 WAC related to the reporting of emissions of

greenhouse gases. [Chapter 173-441 WAC, 12/1/10 – STATE/LOCAL ONLY]

I.D.10. WAC 173-401-530(1)(a) Insignificant Emission Units. Emission units or activities which qualify as insignificant solely on the basis of WAC 173-401-530(1)(a) shall not exceed the emissions thresholds specified in WAC 173-401-530(4) until this permit is modified pursuant to WAC 173-401-725. Upon request from SRCAA, the permittee shall demonstrate that the actual emissions of such a unit or activity are below the applicable emission thresholds. SRCAA shall include in its request a deadline by which the permittee shall submit the emissions data. [WAC 173-401-530(6), 9/16/02]

I.D.11. Report Submittals. All application forms, reports, and compliance certifications required in this permit shall be submitted to:

Director
Spokane Regional Clean Air Agency
3104 E. Augusta
Spokane WA 99207

All such application forms, reports, and compliance certifications must be certified by a responsible official. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information contained in the report are true, accurate and complete. [WAC 173-401-520, 10/4/93]

I.D.12. Rendering Device or Method Inaccurate. The permittee shall not render inaccurate any monitoring device or method required under Chapter 70.94 or 70.120 RCW, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto. [WAC 173-400-105(8), 9/20/93] [WAC 173-400-105(8), 11/28/12 – STATE/LOCAL ONLY]

E. COMPLIANCE CERTIFICATION

I.E.1. Compliance Certification Submittals. The permittee shall submit compliance certifications once per year to SRCAA in accordance with Condition I.D.11-Report Submittals. The compliance certification shall be submitted no later than one hundred and five days after the end of the calendar year for which certification is being made. For emission units not in compliance with terms and conditions of this permit, SRCAA may require more frequent submission of compliance certifications. Additionally, where specified in an applicable requirement, more frequent compliance certifications shall be submitted. [WAC 173-401-630(5)(a), 10/4/93]

I.E.2. Compliance Certification Contents. The compliance certification shall include:

- a. the identification of each term or condition of the permit that is the basis of the certification;
- b. the compliance status;
- c. whether compliance was continuous or intermittent;

- d. the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with WAC 173-401-615(3)(a) (see Condition I.D.6-Monitoring Reports above); and
- e. such other facts as SRCAA may, in writing, require from the permittee to determine the compliance status of the source.

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

[WAC 173-401-630(5)(c), 10/4/93] [WAC 173-401-530(2)(d), 9/16/02]

I.E.3. Credible Evidence. For the purpose of submitting compliance certifications or establishing violations, the permittee shall not preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. [40 CFR 60.11(g), 1/12/11] [WAC 173-400-115, 11/28/12]

I.E.4. Submittal to EPA. The permittee shall submit a copy of all compliance certifications to the Administrator, no later than one hundred and five days after the end of the calendar year for which certification is being made, at the following address:

Administrator
USEPA
MS OAQ-107
1200 Sixth Avenue
Seattle, WA 98101

[WAC 173-401-630(5)(d), 10/4/93]

F. TRUTH AND ACCURACY OF STATEMENTS AND DOCUMENTS & TREATMENT OF DOCUMENTS

I.F.1. False Information. The permittee shall not make any false statement, representation, or certification in any form, notice, or report required under Chapter 70.94 or 70.120 RCW or any ordinance, resolution, regulation, permit, or order in force pursuant thereto. [WAC 173-400-105(6), 8/20/93] [WAC 173-400-105(6), 11/28/12 – STATE/LOCAL ONLY] [SRCAA Regulation I, 2.08.E, 3/4/04 - STATE/LOCAL ONLY]

In addition, the permittee shall not willfully make a false or misleading statement to the Board of Directors of SRCAA or their authorized representatives as to any matter within the jurisdiction of

the Board. [SRCAA Regulation I, 2.08.A, 3/4/04 - STATE/LOCAL ONLY]

I.F.2. Alteration of Documents. The permittee shall not reproduce or alter or cause to be reproduced or altered any order or other paper issued by SRCAA if the purpose of such reproduction or alteration is to evade or violate any provision of Regulation I of Spokane Regional Clean Air Agency or any other law. [SRCAA Regulation I, 2.08.B, 3/4/04 - STATE/LOCAL ONLY]

I.F.3. Availability of Documents. Any order required to be obtained by Regulation I of SRCAA shall be available on the premises designated on the order. [SRCAA Regulation I, 2.08.C, 3/4/04 - STATE/LOCAL ONLY]

I.F.4. Posting of Notices. In the event SRCAA requires a notice to be displayed, it shall be posted. The permittee shall not mutilate, obstruct, or remove any notice unless authorized to do so by the SRCAA Board of Directors. [SRCAA Regulation I, 2.08.D, 3/4/04 - STATE/LOCAL ONLY]

G. APPLICABLE WHEN TRIGGERED REQUIREMENTS

The following conditions summarize requirements that apply if the permittee undertakes the activities specified in the requirement or proposes changes to the source that trigger the applicability of the requirement. The permit does not require monitoring for compliance with the requirements, but the compliance certification required by Condition I.E.1-Compliance Certification Submittals shall describe the permittee's compliance with these requirements.

I.G.1. New Source Review. Prior to the establishment of a new source, including modifications, the permittee may be required to file for and obtain approval under SRCAA's Notice of Construction program. [Chapter 173-400 WAC, 11/28/12 – STATE/LOCAL ONLY] [Chapter 173-460 WAC, 5/20/09 - STATE/LOCAL ONLY] [SRCAA Regulation I, Article V, 5/3/07 - STATE/LOCAL ONLY]

I.G.2. Replacement or Substantial Alteration of Existing Control Equipment. Prior to replacing or substantially altering existing control equipment, the permittee shall file for and obtain approval under SRCAA's Notice of Construction program. [WAC 173-400-114, 8/15/01 - STATE/LOCAL ONLY] [SRCAA Regulation I, Article V, 3/4/04 - STATE/LOCAL ONLY]

I.G.3. Demolition and Renovation (Asbestos). The permittee shall comply with applicable local, state, and federal requirements regarding demolition and renovation. [40 CFR Part 61 Subpart M, 2006] [WAC 173-400-075, 11/28/12] [SRCAA Regulation I, Article IX, 8/5/10 - STATE/LOCAL ONLY]

I.G.4. Source Testing. To demonstrate compliance Ecology or SRCAA may conduct or require that a test be conducted using approved EPA methods from 40 CFR Parts 51, 60, 61, and 63 which are adopted by reference or approved procedures contained in "Source Test Manual - Procedures for Compliance Testing," State of Washington, Department of Ecology, as of September 20, 2004, on file at Ecology. All testing shall be performed in accordance with

SRCAA Regulation I, Section 2.09, "Source Tests." The permittee may be required to provide the necessary platform and sampling ports for Ecology personnel or others to perform a test of an emission unit. Ecology or SRCAA shall be allowed to obtain a sample from any emission unit. The permittee shall be given an opportunity to observe the sampling and to obtain a sample at the same time.

Methods or procedures shall be considered approved if the source submits a source test plan to SRCAA at least 30 days prior to the testing date, or a shorter time if designated in writing by SRCAA, and SRCAA approves the plan in writing. In order to maintain the approved status for the methods and/or procedures, any changes to the plan shall be approved by SRCAA in writing prior to implementation.

[WAC 173-400-105(4), 8/20/93] [WAC 173-400-105(4), 11/28/12 - STATE/LOCAL ONLY] [WAC 173-401-615(1), 9/16/02] [SRCAA Regulation I, Section 2.09, 2/7/08]

I.G.5. Chemical Accident Prevention Provisions. A permittee of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR §68.130, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR Part 68 no later than the latest of the following dates:

- a. Three years after the date on which a regulated substance present above a 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 Part 68, 1998]

II. EMISSION LIMITATIONS & MONITORING AND REPORTING REQUIREMENTS

This section contains emission limitations and emission related requirements including general requirements that apply facility-wide and requirements specific to individual, or groups of, emission units. Applicable requirements are listed in the third column in emission limitation tables. The basis for the applicable requirements is listed in the second column of the emission limitation tables. The averaging time and reference test method, used to determine compliance with the requirement, are listed in the fourth and fifth columns, if applicable. The monitoring, recordkeeping, and reporting requirements (MRRR) used to assure compliance with the requirement are listed in the sixth columns of the emission limitation tables. The MRRR are given at the end of this section.

Some facility-wide requirements may be repeated in emission limitation tables for individual emission units or groups of emission units if additional monitoring is required for that emission unit or group of emission units. Facility-wide requirements apply to all emission units regardless of whether they are listed in every emission limitations table unless otherwise exempted in

Section III. PERMIT SHIELD.

A. FACILITY-WIDE EMISSION LIMITATIONS

Table II.A-3 lists the applicable emission limitations that apply facility-wide. These facility-wide emission limitations apply to all significant and insignificant emissions units at the facility, given in Tables II.A-1 and II.A-2. Requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are therefore not enforceable by the Administrator and citizens under the FCAA.

The facility-wide emission limitations, given in Table II.A-3, apply to insignificant emissions units. However, the monitoring, recordkeeping and reporting requirements given in Sections II.E. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS and in I.D. GENERAL MONITORING, RECORDKEEPING, & REPORTING are not required for the insignificant emission units because SRCAA has determined that they are not necessary to assure compliance with facility-wide emission limitations. The permittee is required to certify compliance with the facility-wide emission limitations for insignificant emission units (see Condition I.E.2-Compliance Certification Contents). [WAC 173-401-530(2)(c) & (d), 9/16/02]

TABLE II.A-1 – Significant Emission Units

EMISSION AREA NUMBER USED IN PERMIT (Process #-Discharge Point #)	Emission Unit Description	Air Pollution Control Equipment
2-1*	Fluidized Bed Combustor (23.0 MMBtu/hr (LHV) and 20,000 acfm at 400 F) with capacity to burn 50 oven-dried tons per day sludge (NOC #1169)	<ul style="list-style-type: none"> • Two baghouses operated in parallel for particulate matter control (Ultra Industries Inc. BW-225-120-III "original" baghouse and Aeropulse, Inc. Model No. PR-128(6)-10-WIP-H-N "supplemental" baghouse (approved in NOC #1169); and • Selective non-catalytic reduction system (ammonia injection system) for NOx control (approved in NOC #1169)
2-1*	#2 Boiler (120 MMBTU/hr)	None
2-2 & 2-3	Ash Handling System – no NOC issued	Baghouse & cyclone
2-4	Wastewater Treatment Plant (2 primary clarifiers, aeration basin, 3 moving bed biofilm reactors, and 1 secondary clarifier)	None

EMISSION AREA NUMBER USED IN PERMIT (Process #-Discharge Point #)	Emission Unit Description	Air Pollution Control Equipment
2-5	#1 Boiler (48 MMBTU/hr)	None
3-4	#3 CMP Primary Refiner approved to process 100 dtpd (NOC #1321)	Cyclone
3-5	#3 CMP Secondary Refiner approved to process 100 dtpd (NOC #1321)	None
3-6	#4 CMP Primary Refiner approved to process 100 dtpd (NOC #1321)	Cyclone
3-7	#1 RMP Chip Silo Separator	Cyclone
3-8	#1 RMP Exhaust	None
3-9	#4 CMP Secondary Refiner approved to process 100 dtpd (NOC #1321)	None
3-10	#4 CMP Conveyor approved to process 100 dtpd (NOC #1321)	None
3-11	#4 CMP Secondary Refiner approved to process 100 dtpd (NOC #1321)	None
3-12	#2 RMP Chip Silo Separator	Cyclone
3-13	#2 RMP Exhaust	None
3-14	Primary Reject Refiner approved to process 100 dtpd (NOC #1096)	None
3-14	Secondary Reject Refiner approved to process 100 dtpd (NOC #1096)	None
N/A – Installed after application was submitted	Wood Chip Storage and Handling System (new truck / rail car unloading station, inlet screen and conveyance systems, outlet conveyance systems, and truck weigh scale) (NOC #1250)	None
N/A – Installed after application was submitted	#5 Refiner Line	Cyclone-scrubber

EMISSION AREA NUMBER USED IN PERMIT (Process #-Discharge Point #)	Emission Unit Description	Air Pollution Control Equipment
N/A	Paper Machine and Dryers	N/A

*The Fluidized Bed Combustor and #2 Boiler exhaust through the same stack.

Table II.A.2 – Insignificant Emission Units (IEUs)

Emission Unit Description	Basis / Justification for IEU Designation
Laboratory Operations	WAC 173-401-533(51) & (73)
Propane Heater, rated at 150,000 BTU/hr	WAC 173-401-533(2)(r)
Propane Heater, rated at 350,000 BTU/hr	WAC 173-401-533(2)(r)
Portable Propane Heaters, each rated at 350,000 BTU/hr, used during the Christmas shutdown to keep the mill warm	WAC 173-401-533(2)(r)
Mill lube oil storage tanks	WAC 173-401-532(3)
Clean condensate tanks	WAC 173-401-532(4) & (96)
Bleaching towers	WAC 173-401-532(4)
Liquid Sodium hydrosulfite tanks	WAC 173-401-532(4)
Hydrogen peroxide (50%) tanks	WAC 173-401-532(4) & (100)
Surfactant tanks (2)	WAC 173-401-532(4)
Water treatment polymer tank	WAC 173-401-532(4)
Sodium silicate tank	WAC 173-401-532(4)
Sodium hydroxide (50%) tanks (2)	WAC 173-401-532(4)
Alum tank	WAC 173-401-533(4) & (97)
Aqua ammonia (20%) tank	WAC 173-401-533(4)
Ammonium polyphosphate sol tank	WAC 173-401-533(4)
Deink process storage tanks	WAC 173-401-532(4) & (98)
Mill lubricants and hydraulic fluid reservoirs and pumping equipment	WAC 173-401-532(3) & (4)
Broke beaters & repulpers	WAC 173-401-532(98)
Stock chests and pulp handling	WAC 173-401-532(4) & (98)
Mill maintenance gases	WAC 173-401-532(5)
Maintenance & repair	WAC 173-401-532(5), (12), (33), (45), (55), & (74)
Dumpsters	WAC 173-401-532(6) & (79)
Auto repair & maintenance shop vehicle exhaust	WAC 173-401-532(7)
Mill vents from rooms, buildings and enclosures that contain permitted emission units or activities	WAC 173-401-532(9)
Building exhaust vents	WAC 173-401-532(9)
Building openings (doors, windows, etc.)	WAC 173-401-532(9)

Steam leaks	WAC 173-401-532(89)
Mill fork lifts & clamp trucks	WAC 173-401-532(10)
Mill cutting torches	WAC 173-401-532(12)
Maintenance metal press	WAC 173-401-532(18)
Sweeping, vacuuming, and mopping activities	WAC 173-401-532(32) & (35)
Portable drums & totes	WAC 173-401-532(42)
Lawn & landscape activities	WAC 173-401-532(43)
Vehicle maintenance	WAC 173-401-532(45) & (77)
Mill air conditioning & refrigerators	WAC 173-401-532(46)
Steam vents, safety & relief valves	WAC 173-401-532(47) & (87)
Mill bathrooms & showers	WAC 173-401-532(48) & (50)
Mill office activities	WAC 173-401-532(49)
Fire training & fire fighting equipment	WAC 173-401-532(52)
Woodworking	WAC 173-401-532(55)
Hydroblasting & sandblasting	WAC 173-401-532(55)
Paper machine winders & slitters	WAC 173-401-532(55), (72), & (111)
Boiler house oxygen scavenger	WAC 173-401-532(61)
Structural changes	WAC 173-401-532(67)
Batteries & battery chargers	WAC 173-401-532(77)
Air compressors, pneumatically operated equipment, & hand tools	WAC 173-401-532(88)
Process water & white water storage tanks	WAC 173-401-532(94)
Paper forming, drying and cooling systems	WAC 173-401-532(106) & (107)
Vacuum system exhaust	WAC 173-401-532(108)
Stock cleaning	WAC 173-401-532(110)
Sludge dewatering & handling	WAC 173-401-532(114)
Screw press vents	WAC 173-401-532(115)
Polymer tanks and associated pumping & handling equipment used for solids dewatering & flocculation	WAC 173-401-532(117)
Degreaser, 20 gal. Capacity (2 units)	WAC 173-401-530(4)(d) – VOC

	emissions of 0.057 tons/year per unit are below threshold of 2 tons/year
Degreaser, 50 gal. Capacity	WAC 173-401-530(4)(d) – VOC emissions of 0.142 tons/year are below threshold of 2 tons/year
LPG tank, 1000 gallon	WAC 173-401-533(2)(d)
Water cooling tower, 900 gpm Capacity	WAC 173-401-533(2)(m)
Welding operations – average welding rod usage at IEPC is 1 lb/day, which is less than threshold of 1 ton/day	WAC 173-401-533(2)(i)

TABLE II.A-3 - Facility-wide Emission Limitations

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
II.A.1	WAC 173-400-040, 8/20/93 WAC 173-400-040, 3/1/11 – STATE/LOCAL ONLY	All emission units are required to use reasonably available control technology, in accordance with WAC 173-400-040 – STATE/LOCAL ONLY			No MRRR required
II.A.2	WAC 173-400-040(2), 173-400-040(2)(a), & 173-400-040(2)(b), 3/1/11(8/20/93)* - see note on page 5	Visible emissions shall not exceed 20%, as specified in WAC 173-400-040	ECOTOLOGY Method 9A (September 20, 2004)	3 minute aggregate in any 1 hour period	1M
II.A.3	SRCAA Regulation I, Section 6.02, 3/4/04 - STATE/LOCAL ONLY	Visible Emissions shall not equal or exceed 20%, as specified in Regulation I of SRCAA, Section 6.02 - STATE/LOCAL ONLY	ECOTOLOGY Method 9A (September 20, 2004)	3 minute aggregate in any 1 hour period	1M
II.A.4	WAC 173-400-040(3), 3/1/11 - STATE/LOCAL ONLY SRCAA Regulation I, Section 6.05.A, 3/4/04(11/12/93)* - see note on page 5	No person shall cause or permit the emission of particulate matter from any source to be deposited beyond the property under direct control of the owner or operator of the source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited or to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited			2M
II.A.5	SRCAA Regulation I,	Reasonable precautions must be			2M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	Section 6.05.C, 3/4/04(11/12/93)* - see note on page 5 SRCAA Regulation I, 6.05.D, 3/4/04(11/12/93)* - see note on page 5 WAC 173-400-040(4)(a), 3/1/11(11/12/93)* - see note on page 5 SRCAA Regulation I, Section 6.05.B, 3/4/04(11/12/93)* - see note on page 5 WAC 173-400-040(9)(a), 3/1/11(8/20/93)* - see note on page 5	taken to: a. Prevent PM from becoming airborne when constructing, altering, repairing, or demolishing buildings, appurtenances, and roads; b. Prevent tracking of PM onto paved roadways open to the public; c. Prevent the release of air contaminants, as specific in WAC 173-400-040(3)(a), if located in an attainment area and not impacting a NAA; d. Prevent PM from becoming airborne when handling, transporting, and /or storing PM; and e. Prevent fugitive dust from becoming airborne and source must be maintained and operated to minimize emissions.			
II.A.6	WAC 173-400-040(5), 3/1/11 – STATE / LOCAL ONLY	Recognized good practices and procedures must be used to reduce odors to a reasonable minimum, in accordance with WAC 173-400-040(5) – STATE / LOCAL ONLY			2M
II.A.7	SRCAA Regulation I, Section 6.04, 4/2/10-STATE/LOCAL ONLY	It shall be unlawful for any person to cause or allow the emission of any air contaminant in sufficient quantities and of such characteristics and duration as is, or is likely to be: a. Injurious to the health and safety of human, animal or plant life; b. Injurious or cause damage to property; or c. Which unreasonably interferes with enjoyment of life and property. Compliance with this requirement shall be determined per the provisions given in SRCAA Regulation I, Section 6.04 (4/2/10)-STATE / LOCAL ONLY			2M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
II.A.8	<p>WAC 173-400-040(6), 3/1/11(8/20/93)* - see note on page 5</p> <p>SRCAA Regulation I, Section 6.06.A, 3/4/04-STATE/LOCAL ONLY</p>	No person shall 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-STATE/LOCAL ONLY			2M
II.A.9	<p>WAC 173-400-040(8), 3/1/11(8/20/93)* - see note on page 5</p> <p>SRCAA Regulation I, 6.07, 3/4/04-STATE/LOCAL ONLY</p>	No person shall cause or permit the installation or use of any means which conceals or masks an emission of an air contaminant which would otherwise violate any provisions of Chapter 173-400 WAC - STATE/LOCAL ONLY			No MRRR required
II.A.10	<p>WAC 173-400-050(1) & WAC 173-400-050(3), 11/28/12(2/19/91)* - see note on page 5</p> <p>NOTE: The exception in WAC 173-400-050(3) is STATE/LOCAL ONLY. This exception allows for an alternate correction to measured concentrations (other than 7% oxygen) if determined by Spokane Regional Clean Air Agency to be representative of normal operations.</p>	<p>Particulate matter emissions from combustion and incineration units shall not exceed 0.1 gr/dscf, corrected to 7% oxygen, as specified in WAC 173-400-050(1) & WAC 173-400-050(3).</p> <p>NOTE: The exception in WAC 173-400-050(3) is STATE/LOCAL ONLY. This exception allows for an alternate correction to measured concentrations (other than 7% oxygen) if determined by SRCAA to be representative of normal operations.</p>	RM 5 (2010) or procedures in WAC 173-400-050 approved per Condition I.G.4-Source Testing	average of three one-hour tests	1M, 3M, 4M
II.A.11	<p>WAC 173-400-060, 2/19/91</p> <p>WAC 173-400-060, 1/10/05 – STATE/LOCAL ONLY</p>	Particulate matter emissions from general process units shall not exceed 0.1 gr/dscf, as specified in WAC 173-400-060	RM 5 (2010) or procedures in WAC 173-400-060 approved per Condition I.G.4-Source Testing	average of three one-hour tests	1M
II.A.12	<p>WAC 173-400-040(7), 3/1/11(8/20/93)* - see note on page 5</p> <p>NOTE: The second paragraph of WAC 173-400-040(7) is STATE/LOCAL ONLY</p>	<p>SO2 emissions from each unit shall not exceed 1000 ppm on a dry basis, corrected to 7% oxygen, as specified in WAC 173-400-040(7).</p> <p>NOTE: The second paragraph of WAC 173-400-040(7) is STATE/LOCAL ONLY</p>	Procedures in WAC 173-400-105(4) approved per Condition I.G.4-Source Testing	any period of 60 consecutive minutes	3M
II.A.13	WAC 173-400-200,	No use of excess stack height or			No MRRR

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	1/10/05(2/19/91)* - see note on page 5	dispersion techniques to meet ambient air quality standards or PSD increments except as allowed under WAC 173-400-200.			required
II.A.14	WAC 173-400-205, 2/19/91	No varying of emissions according to atmospheric conditions or ambient concentrations except as allowed under WAC 173-400-205.			No MRRR required
II.A.15	Chapter 173-425 WAC, 3/13/00(10/18/90)* - see note on page 5 SRCAA Regulation I, Section 6.01, 11/6/08 - STATE/LOCAL ONLY	No outdoor burning, except as allowed under Chapter 173-425 WAC and/or Regulation I of SRCAA, Section 6.01			No MRRR required
II.A.16	40 CFR Part 82, 2006	Handling and use of ozone-depleting substances must be in accord with 40 CFR Part 82.			No MRRR required

B. FLUIDIZED BED COMBUSTOR EMISSION LIMITATIONS

This section of the permit covers the fluidized bed combustor (FBC) and associated operations. The units covered are listed in Table II.B-1.

Table II.B-1 - Fluidized Bed Combustor Emission Units

Emission Unit Description	EMISSION AREA NUMBER USED IN PERMIT (Process #-Discharge Point #)	Fuels Used	Air Pollution Control Equipment
Fluidized Bed Combustor (23.0 MMBtu/hr (LHV) and 20,000 acfm at 400 F) with capacity to burn 50 oven-dried tons per day sludge (NOC #1169)	2-1*	Natural gas and wood waste derived fuels, including chip screen rejects, paper sludge, and de-inking sludge	<ul style="list-style-type: none"> • Two baghouses operated in parallel for particulate matter control (Ultra Industries Inc. BW-225-120-III "original" baghouse and Aeropulse, Inc. Model No. PR-128(6)-10-WIP-H-N "supplemental" baghouse (approved in NOC #1169); and • Selective non-catalytic reduction system (ammonia injection system) for NOx control (approved in NOC #1169)

Emission Unit Description	EMISSION AREA NUMBER USED IN PERMIT (Process #-Discharge Point #)	Fuels Used	Air Pollution Control Equipment
Ash Handling System – no NOC issued	2-2 & 2-3	N/A	Baghouse

*The Fluidized Bed Combustor exhausts through the same stack as Boiler #2

Table II.B-2 lists the applicable requirements for the fluidized bed combustor listed in Table II.B-1. Requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation.

Table II.B-2 - Fluidized Bed Combustor Emission Limitations

Condition Number	Basis For Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
II.B.1	NOC #1169, Condition 1, 12/30/03 as revised on 3/29/04, 6/10/05, 7/13/06, and 7/9/08	A copy of NOC #1169 and the conditions of approval shall be kept on site and made available to SRCAA personnel upon request.			No MRRR Required
II.B.2	NOC #1169, Condition 4, 12/30/03 as revised on 3/29/04, 6/10/05, 7/13/06, and 7/9/08	SO ₂ emissions from the combined new fluidized bed combustor baghouse exhaust and the original fluidized bed combustor baghouse system exhaust stack shall not exceed 4.05 pounds per hour.	RM 6C (November 6, 2008) or approved procedures per WAC 173-400-050		3M, 8M
II.B.3	NOC #1169, Condition 4, 12/30/03 as revised on 3/29/04, 6/10/05, 7/13/06, and 7/9/08	NO _x emissions from the combined new fluidized bed combustor baghouse exhaust and the original fluidized bed combustor baghouse system exhaust stack shall not exceed 243 ppm corrected to 7% oxygen.	RM 7E (June 2, 2009) or approved procedures per WAC 173-400-050		3M, 7M, 10M
II.B.4	NOC #1169, Condition 4, 12/30/03 as revised on 3/29/04, 6/10/05, 7/13/06, and 7/9/08	CO emissions from the combined new fluidized bed combustor baghouse exhaust and the original fluidized bed combustor baghouse system exhaust stack shall not exceed 50 ppm corrected to 7% oxygen.	RM 10 (August 14, 2006) or approved procedures per WAC 173-400-050		7M, 9M
II.B.5	NOC #1169, Condition 4, 12/30/03 as revised on 3/29/04, 6/10/05,	VOC emissions from the combined new fluidized bed combustor baghouse exhaust and the original fluidized bed combustor baghouse	RM 25A (February 2000) or approved	average of three one-hour tests	9M

Condition Number	Basis For Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	7/13/06, and 7/9/08	system exhaust stack shall not exceed 30 ppm (total nonmethane hydrocarbons weighted as methane).	procedures per WAC 173-400-050		
II.B.6	NOC #1169, Condition 4, 12/30/03 as revised on 3/29/04, 6/10/05, 7/13/06, and 7/9/08	Ammonia emissions from the combined new fluidized bed combustor baghouse exhaust and the original fluidized bed combustor baghouse system exhaust stack shall not exceed 20 ppm	Bay Area Air Quality Management District Source Test Procedure ST-1B, or alternate test method approved by SRCAA	average of three one-hour tests	10M
II.B.7	NOC #1169, Condition 7, 12/30/03 as revised on 3/29/04, 6/10/05, 7/13/06, and 7/9/08	Visible emissions from the fluidized bed combustor stack (downstream of both FBC baghouses) shall not exceed 10% for more than 3 minutes in any one hour period.	Continuous opacity monitor or ECOLOGY Method 9A (July 12, 1990)	3 minute average in any one hour by continuous opacity monitor or aggregate of 3 minutes in any one hour by visual observation	11M
II.B.8	NOC #1169, Condition 4, 12/30/03 as revised on 3/29/04, 6/10/05, 7/13/06, and 7/9/08	Particulate matter (PM10) emissions from the combined new fluidized bed combustor baghouse exhaust and the original fluidized bed combustor baghouse system exhaust stack shall not exceed 0.023 gr/dscf (front half and back half) corrected to 7% oxygen.	RM 5 (February 2000) or approved procedures per WAC 173-400-050	Average of three one-hour tests	11M
II.B.9	NOC #1169, Condition 3, 12/20/03 as revised on 3/29/04, 6/10/05, 7/13/06, and 7/9/08	Only natural gas, de-inking sludge, paper sludge, chip screen rejects, and/or other SRCAA approved fuels shall be used to fire the fluidized bed combustor.			3M
II.B.10	NOC #1169, Condition 3, 12/30/03 as revised on 3/29/04, 6/10/05, 7/13/06, and 7/9/08	No more than 50 tons of wood waste derived fuel (i.e., de-inking sludge, paper sludge, and/or chip screen rejects) shall be burned in the FBC each day.			6M, 12M

Condition Number	Basis For Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
II.B.11	NOC #1169, Condition 9, 12/30/03 as revised on 3/29/04, 6/10/05, 7/13/06, and 7/9/08	Ash from the fluidized bed combustor shall be handled in a manner to minimize fugitive emissions.			13M
II.B.12	NOC #1169, Condition 10, 12/30/03 as revised on 3/29/04, 6/10/05, 7/13/06, and 7/9/08	Vapor space temperature in the fluidized bed combustor shall be maintained at a minimum of 1600°F, with a residence time of at least 2 seconds, whenever wood waste derived fuel (i.e., de-inking sludge, paper sludge, and/or chip screen rejects) is being burned in the combustor.			9M
II.B.13	NOC #1169, Condition 15, 12/30/03 as revised on 3/29/04, 6/10/05, 7/13/06, and 7/9/08	At all times that the fluidized bed combustor is in operation with a throughput of 50 dry tons per day, the selective non-catalytic reduction system shall be in operation and injecting a 20% aqua ammonia solution into the vapor space of the FBC at a minimum flow rate of 2.0 gallons per hour or an alternate flow rate approved by SRCAA.			10M
II.B.14	40 CFR 61.52(b), 2000 WAC 173-400-115, 11/28/12	Mercury emissions to the atmosphere from the FBC exhaust stack shall not exceed 3.2 kg (7.1 lbs) per 24 hour period	40 CFR 61.53(d) or 61.54, 1995	24 hour period	3M
II.B.15	SRCAA Regulation I, Section 6.03.C, 3/4/04	Incineration shall occur during approved hours only. (The FBC is approved for 24-hour per day operation.)			No MRRR required
II.B.16	WAC 173-400-115, 11/28/12 40 CFR §60.48c(g), 2009	Records shall be kept of the types and amounts of fuel combusted each day in the FBC.			12M
II.B.17	WAC 173-400-115, 11/28/12 40 CFR §60.11(d), 2000 NOC #1169, Condition 2, 12/30/03 as revised on 4/29/04, 6/10/05,	At all times, including periods of startup, shutdown, and malfunction, the fluidized bed combustor, two baghouses, and Selective Non-Catalytic Reduction (SNCR) system shall be operated in a manner consistent with good air pollution control practices.			5M

Condition Number	Basis For Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	7/13/06, and 7/9/08				
II.B.18	WAC 173-400-060, 2/19/91 WAC 173-400-060, 1/10/05 – STATE/LOCAL ONLY	Particulate matter emissions from general process units shall not exceed 0.1 gr/dscf, as specified in WAC 173-400-060	RM 5 (February 2000) or procedures in WAC 173-400-060 approved per Condition I.G.4-Source Testing	average of three one-hour tests	11M
II.B.19	WAC 173-400-040(1), 173-400-040(1)(a), & 173-400-040(1)(b), 1/10/05(8/20/93)* - see note on page 5	Visible emissions shall not exceed 20%, as specified in WAC 173-400-040	ECOLOGY Method 9A (September 20, 2004)	3 minute aggregate in any 1 hour period	11M
II.B.20	SRCAA Regulation I, Section 6.02, 3/4/04 - STATE/LOCAL ONLY	Visible Emissions shall not equal or exceed 20%, as specified in Regulation I of SRCAA, Section 6.02 - STATE/LOCAL ONLY	ECOLOGY Method 9A (September 20, 2004)	3 minute aggregate in any 1 hour period	11M
II.B.21	63.11225(a)(2), 2/1/13	By no later than January 20, 2014, an Initial Notification, which indicates the FBC is subject to 40 CFR 63 Subpart JJJJJJ, shall be submitted to EPA, Region 10. The Initial Notification shall contain the information specified in 40 CFR 63.9(b)			21M
II.B.22	40 CFR §63.11214(b), 2/1/13	By no later than March 21, 2014, a performance tune-up shall be conducted on the FBC as specified in 40 CFR 63.11223(b).			22M
II.B.23	40 CFR §63.11214, 2/1/13	By no later than March 21, 2014, a one-time energy assessment must be performed on the FBC as specified in 40 CFR 63.11214 and Item 16, Table 2 of 40 CFR 63 Subpart JJJJJJ.			22M
II.B.24	40 CFR §63.11223(a), 2/1/13	After the performance tune-up described in Condition II.B.22, a tune-up shall be conducted on the FBC biennially, as described in 40 CFR 63.11223 (b). Each biennial tune-up must be conducted no more than 25 months after the previous			23M

Condition Number	Basis For Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
		tune-up.			
II.B.25	40 CFR §63.11205(a). 2/1/13	At all times the FBC and associated air pollution control and monitoring equipment must be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions.			52M, 23M

C. PULP MILL EMISSION LIMITATIONS

This section of the permit covers the pulp mill emission limitations, which includes the two thermo-mechanical pulp (# 3 TMP & #4 TMP) refiner lines, one thermo-mechanical pulp refiner line with heat recovery (#5 TMP), and the reject refiner system at the mill. The units covered are listed in Table II.C-1.

Table II.C-1 – Pulp Mill Emission Units

Emission Unit Description	EMISSION AREA NUMBER USED IN PERMIT (Process #- Discharge Point #)	Fuels Used	Air Pollution Control Equipment
#3 TMP Primary Refiner approved to process 100 dtpd (NOC #1321)	3-4	N/A	Cyclone
#3 TMP Secondary Refiner approved to process 100 dtpd (NOC #1321)	3-5	N/A	None
#4 TMP Primary Refiner approved to process 100 dtpd (NOC #1321)	3-6	N/A	Cyclone
#4 TMP Secondary Refiner approved to process 100 dtpd (NOC #1321)	3-9	N/A	None
#4 TMP Conveyor approved to process 100 dtpd (NOC #1321)	3-10	N/A	None
#4 TMP Secondary Refiner approved to process 100 dtpd (NOC #1321)	3-11	N/A	None
Primary Reject Refiner	3-14	N/A	None

Emission Unit Description	EMISSION AREA NUMBER USED IN PERMIT (Process #- Discharge Point #)	Fuels Used	Air Pollution Control Equipment
approved to process 100 dtpd (NOC #1096)			
Secondary Reject Refiner approved to process 100 dtpd (NOC #1096)	3-14	N/A	None
#5 TMP System, rated at 475 dtpd with heat recovery system (re-boiler, vent condenser, and start-up scrubber) (NOC #1463)	N/A – installed after application was submitted	N/A	Re-boiler, vent condenser, and start-up scrubber

Table II.C-2 lists the applicable requirements for the emission units listed in Table II.C-1. Requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation.

Table II.C-2 – Pulp Mill Emission Limitations

Condition Number	Basis For Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
II.C.1	NOC #1321, Condition 6, 12/21/05	Particulate matter emissions from each of the #3 and #4 refiner line exhaust stacks shall not exceed 0.04 gr/dscf.	RM 5 (February 2000) or approved procedures per WAC 173-400-050	average of three one-hour tests	1M
II.C.2	NOC #1321, Condition 3, 12/21/05	A copy of the Notice of Construction and the conditions of approval shall be kept on site and made available to SRCAA personnel upon request.			No MRRR required
II.C.3	NOC #1321, Condition 4, 12/21/05	The exhaust stacks associated with the refiner lines #3 & #4 shall exhaust vertically. No elbows, tees, or stack caps that impede the vertical flow of exhaust air shall be installed at the end of the stacks.			No MRRR required
II.C.4	NOC #1321, Condition 4, 12/21/05	Visible emissions from each of the exhaust stacks associated with the refiner lines #3 & #4 shall not exceed 10% opacity.	EPA Method 9 (8/20/96)	Six minute average in any one hour period	1M
II.C.5	NOC #1321, Condition 7, 12/21/05	Visible emissions from each chip silo separator and cyclone separator shall	EPA Method 9	Six minute average in any one	1M

Condition Number	Basis For Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
		not exceed 5% opacity.	(8/20/96)	hour period	
II.C.6	NOC #1321, Condition 8, 12/21/05	No more than 35,500 tons of oven dried pulp shall be processed in refiner line #3 or #4 during any consecutive 12 month period.			14M
II.C.7	NOC #1096, Condition 1, 10/19/01 as revised on 4/16/02 and 6/7/05	A copy of the approved NOC #1096 and the conditions of approval must be kept on site and made available to SRCAA personnel upon request.			No MRRR required
II.C.8	NOC #1096, Condition 2, 10/19/01 as revised on 4/16/02 and 6/7/05	The reject refiner system shall be maintained in proper working condition, according to the manufacturer recommended practices and procedures.			15M
II.C.9	NOC #1096, Condition 3, 10/19/01 as revised on 4/16/02 and 6/7/05	The primary and secondary refiner stacks shall exhaust vertically. No elbows, tees, or stack caps that impede the vertical flow of exhaust air shall be installed at the end of the stacks.			No MRRR required
II.C.10	NOC #1096, Condition 4, 10/19/01 as revised on 4/16/02 and 6/7/05	Visible emissions from the primary and secondary reject refiner stacks shall not exceed 5% opacity.	EPA Method 9 (8/20/96)	Six minute average in any one hour period	1M
II.C.11	NOC #1096, Condition 5, 10/19/01 as revised on 4/16/02 and 6/7/05	No more than 100 tons of oven dried pulp per day, as measured at the dewatering screw press feed, shall be processed in the primary or secondary reject refiner.			16M
II.C.12	NOC #1096, Condition 6, 10/19/01 as revised on 4/16/02 and 6/7/05	Within 90 days after the reject refiner system achieves a potential throughput of 100 tons of oven dried pulp per day, a stack test shall be performed on the primary and secondary refiner exhausts to quantify the chloroform emissions.			17M
II.C.13	NOC #1463, Condition 5, 8/13/09	A copy of the Notice of Construction and the conditions of approval shall be kept on site and made available to SRCAA personnel upon request.			No MRRR required
II.C.14	NOC #1463, Condition 6, 8/13/09	The #5 TMP system and heat recovery system shall be maintained in proper working condition, according to the manufacturer recommended practices and procedures.			19M

Condition Number	Basis For Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
II.C.15	NOC #1463, Condition 7, 8/13/09	Visible emissions from the vent condenser exhaust and the start-up scrubber exhaust associated with the #5 TMP shall not exceed 5% opacity.	EPA Method 9 (8/20/96)	Six-minute average	1M
II.C.16	NOC #1463, Condition 8, 8/13/09	No more than 475 tons of oven dried pulp per day shall be processed in the #5 TMP line.			20M

D. WOOD CHIP STORAGE AND HANDLING SYSTEM EMISSION LIMITATIONS

This section of the permit covers the wood chip storage and handling system emission limitations. The units covered are listed in Table II.D-1.

Table II.D-1 – Wood Chip Storage and Handling System Emission Units

Emission Unit Description	EMISSION AREA NUMBER USED IN PERMIT (Process #- Discharge Point #)	Fuels Used	Air Pollution Control Equipment
Wood Chip Storage and Handling System (new truck / rail car unloading station, inlet screen and conveyance systems, outlet conveyance systems, and truck weigh scale) (NOC #1250)	N/A – Installed after application was submitted	N/A	None

Table II.D-2 lists the applicable requirements for the emission units listed in Table II.D-1. Requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation.

Table II.D-2 – Wood Chip Storage and Handling System Emission Limitations

Condition Number	Basis For Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
II.D.1	NOC #1250, Condition 3, 1/13/05 – STATE / LOCAL	The wood chip storage and handling system shall be maintained in proper working condition. – STATE / LOCAL			18M

Condition Number	Basis For Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	ONLY	ONLY			
II.D.2	NOC #1250, Condition 5, 1/13/05 – STATE / LOCAL ONLY	<p>The truck / rail car unloading station shall be maintained and operated in a manner which minimizes fugitive particulate emissions, including but not limited to the following:</p> <ul style="list-style-type: none"> a. The area around the unloading station shall be kept clean; and b. Any material that has been spilled or tracked out onto paved areas shall be promptly cleaned. <p>STATE / LOCAL ONLY</p>			2M, 18M

E. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

1M. The permittee shall meet the requirements given in a) and if triggered, the permittee shall meet the requirements given in b) and/or c).

- a) The permittee shall perform weekly inspections during daylight hours while the facility is operating for the purpose of observing points of visible emissions and PM emissions from all emission units and activities at the facility which are subject to opacity and/or particulate standards. The weekly inspections shall be conducted as follows:
 - 1) each inspection shall be conducted from a location(s) with a clear view of each emission source where the sun is not directly in the observer’s eyes. The inspection location(s) shall be at least 15 feet but not more than 0.25 miles from the emission source;
 - 2) the observer shall be educated in the general procedures for determining the presence of visible emissions (i.e., effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, and observer position relative to the source and sun);
 - 3) each inspection shall consist of a minimum 15-second visual observation of each emission source to identify those emission sources which exhibit visible emissions; and
 - 4) records shall be kept of each inspection, including the name of the observer, the date and time of the inspection, and the observations made during the inspection. Records shall be kept in accordance Condition I.D.5- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

If visible emissions are not observed from any emission source at the facility during the

weekly inspection, no additional action is required. If visible emissions are observed from any emission source, the permittee shall take further action according to b).

- b) If visible emissions are observed during an inspection or are otherwise observed by the permittee, the permittee shall verify and certify that:
- 1) the visible emissions or PM emissions are not the result of equipment malfunction, and the equipment, if any, from which the emissions are released, is performing its normal, designed function;
 - 2) the air pollution control equipment, if any, is being operated properly in accordance with normal operating procedures; and
 - 3) if the visible emissions are the result of fugitive emissions, reasonable precautions are being taken to minimize emissions.

If b) 1), b) 2), and/or, b) 3) are not being met, corrective action must be taken as soon as possible, but no later than three days from discovery, to correct the problem. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations.

The permittee shall keep records of any verifications made regarding b) 1), b) 2), and/or b) 3) and a description of any corrective action taken. Records shall be kept in accordance Condition I.D.5- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

If b) 1), b) 2), and b) 3), are being met, but visible emissions are still observed, the permittee shall take further action according to c).

- c) If visible emissions are still observed and b) 1), b) 2), and b) 3) are being met, the permittee shall perform testing according to c) 1) and, if a particulate matter standard applies, testing according to c) 2).
- 1) As a means of demonstrating compliance with the visible emissions standard(s), the permittee shall perform, or have performed, RM 9 (July 1, 2009) or Ecology Method 9A (September 20, 2004), whichever is applicable, on the source of the visible emissions. The test shall occur within a reasonable timeframe but no later than 24 hours after discovery of the emissions. If the visible emissions exceed the applicable standard, the permittee shall take timely and appropriate corrective action (as soon as possible, but within 24 hours) to address the problem. The results of the RM 9 or Ecology Method 9A test shall be submitted to SRCAA within two working days of the test.
 - 2) As a means of demonstrating compliance with PM emission limit(s), the permittee shall perform, or have performed, RM 5 (February 2010) on the source of the emissions. The test shall occur within a reasonable timeframe but no later than 30 days after discovery of the emissions. The results of the RM 5 test shall be submitted to SRCAA as soon as possible but no later than 45 days after the testing. If measured emissions exceed the applicable standard, the permittee shall take appropriate and timely corrective action to

address the problem.

Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations.

[WAC 173-401-615(1) & (2), 9/16/02] [WAC 173-400-050(1), 1/10/05 (2/19/91)] [WAC 173-400-060, (2/19/91)] [WAC 173-400-060, 1/10/05 – STATE/LOCAL ONLY] [WAC 173-400-105(4), 8/20/93] [WAC 173-400-105(4), 1/10/05 – STATE/LOCAL ONLY] NOTE: This is a gapfilling MRRR.

2M. The permittee shall meet the requirements given in a) and b), and if triggered, the permittee shall meet the requirements given in c).

- a) The permittee shall perform weekly inspections of the facility during daylight hours while the facility is in operation to verify that each requirement for which this MRRR is specified in the “MRRR Reference” column in the above tables is being met. Records shall be kept of each inspection, including the name of the observer, the date and time of the inspection, and the observations made during the inspection. Records shall be kept in accordance Condition I.D.5- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.
- b) The permittee shall record and investigate complaints received regarding air quality problems. Complaints shall be investigated as soon as possible, but no later than 8 hours of receipt or by the end of the first regular business day during which the complaint was received, whichever is later. Receipt of a complaint does not, in and of itself, establish a violation. Records shall be kept of each complaint investigation, including the date and time that the complaint was received, the date and time of the complaint investigation, and observations made during the investigation. Records shall be kept in accordance Condition I.D.5- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.
- c) If potential violations of the requirement(s) are observed during the weekly inspections, as part of the complaint investigation, and/or at any other time, the permittee shall take timely and appropriate corrective action. Action shall be considered timely and appropriate if the problem is solved as soon as possible, but no later than 24 hours of first observing the problem. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the requirement to report any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations. Records shall be kept of all correction action(s) taken by the permittee. Records shall be kept in accordance Condition I.D.5- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

[WAC 173-401-615(1) & (2), 9/16/02] – NOTE: This is a gapfilling MRRR

3M. Certification that only natural gas, propane (LPG), and fuel oil #6 were used as fuel in all fuel fired equipment, except the fluidized bed combustor, during the reporting period, shall

demonstrate compliance with this requirement. For the fluidized bed combustor, certification that only natural gas, de-inking sludge, paper sludge, and/or chip screen rejects were used as fuel during the reporting period, shall demonstrate compliance with this requirement. [WAC 173-401-615(1) & (2), 9/16/02] – NOTE: This is a gapfilling MRRR

4M. The boilers shall be serviced at least once each calendar year to assure proper combustion is occurring and that the units are in proper operating condition. At a minimum, the service shall include checking the burners and fire brick. If deterioration, sufficient to affect proper combustion is found, corrective action shall be taken before the unit is re-fired. The permittee shall maintain records of each servicing. At a minimum, the records shall include the dates of each service, the unit being serviced, a brief description of the findings, a description of any corrective action taken, and any other information required in Condition I.D.1-Records of Required Monitoring Information. The records shall be kept in accordance with Condition I.D.5-Retention of Records, and, upon request, shall be made available for inspection by SRCAA staff or other authorized representatives. [WAC 173-401-615(1) & (2), 9/16/02] – NOTE: This is a gapfilling MRRR

5M. An operation and maintenance (O&M) plan shall be developed which provides a description of how the fluidized bed combustor, two baghouses, and selective non-catalytic reduction system will be operated to minimize emissions. Manufacturer O&M plans are generally acceptable. The plan shall include the manufacturer recommended pressure drop ranges for the baghouses.

Maintenance records shall be kept to document that the O&M plan is being followed. Records shall be kept in accordance with Condition I.D.5 and, upon request, shall be made available for inspection by SRCAA staff or other authorized representatives.

[NOC #1169, Condition 2, 12/30/03 as revised on 3/29/04, 6/10/05, 7/13/06, and 7/9/08]

6M. At least once every six months, the permittee shall physically measure and record the amount of wood waste derived fuel (i.e., de-inking sludge, paper sludge, and/or chip screen rejects) burned in the fluidized bed combustor, according to the method described in the May 5, 2003 memo from Inland Empire Paper Company. Records shall be kept in accordance with Condition I.D.5, and, upon request, shall be made available for inspection by SRCAA staff or other authorized representatives.

[NOC #1169, Condition 3, 12/30/03 as revised on 3/29/04, 6/10/05, 7/13/06, and 7/9/08]

7M. The permittee shall perform a combustion test on the fluidized bed combustor to verify compliance with the NO_x and CO limits at least once during each calendar year, unless SRCAA approves a less frequent testing schedule. Testing shall be done per the following requirements:

- a) The combustion test shall be performed using a combustion analyzer or other SRCAA approved test method. The combustion analyzer used for each test shall be capable of analyzing for NO_x and CO emissions.
- b) During each test, the FBC shall be operated as close to 100% of the maximum capacity

as possible (i.e., 50 tons per day). The combustion tests shall reflect FBC operation under actual conditions (i.e., performed after all adjustments, tuning, etc., have been completed).

- c) During each combustion test, following operational parameters shall be measured and recorded:
- 1) NO_x and CO concentrations (in ppmv) in the exhaust stream;
 - 2) Percent O₂ for each NO_x and CO reading; and
 - 3) Average load.
- d) A report documenting the results of each combustion test shall be submitted to SRCAA within 30 days of each test. The report shall include:
- 1) A calibration report for the combustion analyzer;
 - 2) A summary of the NO_x and CO emissions given in ppmv and corrected to 7% oxygen;
[NO_x, or CO] ppmv (@ 7% O₂) = Measured [NO_x, or CO] ppmv x (20.9-7)/(20.9-Measured [NO_x, or CO] %O₂)
 - 3) The parameters listed under c.; and
 - 4) Copies of actual data sheets.

[NOC #1169, Condition 5, 12/30/03 as revised on 3/29/04, 6/10/05, 7/13/06, and 7/9/08]

8M. At least once each calendar year, SO₂ emissions from the FBC exhaust stack shall be measured with a portable SO₂ monitor, or by an alternate method approved by SRCAA. During each test, the following shall be met:

- 1) The sludge feed rate shall be recorded during each test and reported with the test results.
- 2) The SO₂ analyzer shall be calibrated, using certified calibration gases, prior to each test.
- 3) Each test shall consist of three separate test runs, each of which is at least 15 minutes in duration.
- 4) The following constituents shall be measured during each test run:
 - i) SO₂ concentration;
 - ii) Oxygen (O₂) concentration; and
 - iii) Stack flow rate.
- 5) A report, summarizing the test results, shall be submitted to SRCAA for approval no later than 45 days after each test is performed. The report shall include the information described in 1) – 4) above, data from the three test runs, and the average SO₂ mass flow emission rate from the three runs.

[NOC #1169, Condition 6, 12/30/03 as revised on 3/29/04, 6/10/05, 7/13/06, and 7/9/08]

9M. The fluidized bed combustor's vapor space temperature shall be continuously monitored, using a thermocouple or other SRCAA approved method, and recorded using a stripchart

recorder or SRCAA approved alternative recording device, whenever the FBC is in operation. The temperature measuring device shall be calibrated periodically, per the manufacturer recommendations. Records shall be kept of all calibrations and other maintenance done on the thermocouple.

If the fluidized bed combustor's vapor space temperature falls below 1600° F when wood waste derived fuel is being burned in the fluidized bed combustor, corrective action must be taken within 30 minutes to bring the vapor space temperature above 1600° F. Records shall be kept, on the stripchart or SRCAA approved alternative recording device, of each occasion when the vapor space temperature falls below 1600° F, including the date, time when the vapor space temperature dropped below 1600° F, time when the vapor space temperature rose above 1600° F, and corrective action taken. If corrective action cannot bring the vapor space temperature to the required minimum temperature (i.e., 1600° F) within 30 minutes, the permittee shall stop feeding wood derived waste to the combustor.

Records shall be kept, on the stripchart or SRCAA approved alternative recording device, of each occasion when the flow of wood waste derived fuel (i.e., de-inking sludge, paper sludge, and/or chip screen rejects) to the combustor is stopped, including the date, time when wood waste derived fuel is stopped being fed to the combustor, time when wood waste derived fuel commences being fed to the combustor, and explanation for each shutdown. All required records shall be kept in accordance with Condition I.D.1-Records of Required Monitoring Information and Condition I.D.5- Retention of Records and, upon request, shall be made available for inspection by SRCAA staff or other authorized representatives.

[NOC #1169, Condition 11, 12/30/03 as revised on 3/29/04, 6/10/05, 7/13/06, and 7/9/08]

10M. At all times that the fluidized bed combustor is in operation with a throughput of 50 dry tons per day, the permittee shall continuously monitor the ammonia flow into the vapor space of the FBC. At least once every hour, the ammonia flow rate into the FBC must be recorded. Hourly ammonia flow rate records shall be kept in accordance with Condition I.D.1-Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.

If the ammonia flow drops below 2 gallons per hour, corrective action must be taken within 30 minutes to bring the ammonia flow to at least 2 gallons per hour. Records shall be kept of the date, time when the ammonia flow dropped below 2 gallons per hour, time when the ammonia flow rose to at least 2 gallons per hour, and any corrective action taken. All records shall be kept for five years in accordance with Condition I.D.5-Retention of Records and upon request, made available to SRCAA staff or other authorized representatives. If corrective action does not bring the ammonia flow to the required minimum rate (i.e., 2 gallons per hour) within 30 minutes, the permittee shall reduce the wood waste derived fuel to the combustor to 45 dry tons per day or less until the ammonia flow problem has been resolved.

[WAC 173-401-615(1)&(2), 9/16/02] – NOTE: This is a gapfilling MRRR

11M. The following shall function as Compliance Assurance Monitoring for the Fluidized Bed Combustor:

a) Fluidized Bed Combustor Opacity

- 1) The permittee shall monitor the opacity from the fluidized bed combustor exhaust stack (downstream of both baghouses) continuously, using a continuous opacity monitor (COM) and data processing and recording equipment, meeting the requirements of 40 CFR 60.13 (1995) and 40 CFR 60, Appendix B (1995). Records of each 3-minute average opacity shall be kept in accordance with Condition I.D.1-Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to Spokane Regional Clear Air Agency staff or other authorized representatives.
- 2) Daily COM checks shall be made, including verifying that the recorder is working and that the daily COM calibration results are showing that the COM is meeting accuracy requirements. If results indicate a malfunction, the COM shall be serviced as expeditiously as possible to correct the deficiency. In addition, the COM shall be audited at least every quarter and shall maintain a calibration error of 3% or less, calculated in accordance with 40 CFR Part 60, Appendix B, Performance Specification 1 (1998). If greater errors are detected during any audit, the source of the error shall be identified, corrected, and the COM re-audited as expeditiously as possible. Correction of the error shall be considered expeditious as long as the data availability requirement described in iii. below is met. Records of each daily check and quarterly audit shall be kept in accordance with Condition I.D.1- Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.
- 3) The permittee shall recover valid monitoring data for at least 90% of all monitoring periods during each month. Monitoring period means the period over which data are averaged or collected if no averaging is used, to determine compliance with the requirement. Monitoring periods do not include any period that the fluidized bed combustor does not operate. Monitoring periods also do not include any period during which an unavoidable monitoring system malfunction occurred. In determining whether a malfunction was unavoidable, the following criteria shall be considered:
 - i) whether the malfunction was caused by poor or inadequate operation, maintenance, or any other reasonably preventable condition;
 - ii) whether the malfunction was of a recurring pattern indicative of inadequate operation or maintenance; and
 - iii) whether the permittee took appropriate action as expeditiously as practicable to correct the malfunction.

A report shall be filed with SRCAA no later than 30 days after the end of every month during which opacity was recovered for less than 90% of the monitoring periods for an applicable requirement. The report shall provide the reason the data were not collected (e.g., a description of the malfunction), information regarding operation of the monitored

process during the monitoring system malfunction (e.g., process parameters which would be indicative of the compliance status of the process with applicable requirements), information regarding a) 3) i), ii), and iii) of this condition, and any further actions that the permittee will take to ensure adequate collection of such data in the future.

- 4) The opacity from the fluidized bed combustor exhaust stack shall not exceed 10% during each 3-minute average, as measured by the COM. If the opacity during any 3-minute average exceeds 10% in any one hour period, an exceedance of the opacity standard has occurred, and appropriate corrective action shall be initiated as soon as possible, but no later than 12 hours after discovery of the violation to identify and correct the problem. The goal of the corrective action taken shall be to achieve compliance with the opacity standard as soon as possible and to prevent recurrence of the problem. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations. Records of all corrective actions taken and the results of such actions shall be kept, in accordance with Condition I.D.1- Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives
- 5) The permittee shall report all opacity exceedances to SRCAA as part of the semiannual monitoring report, described in Condition I.D.6. The report shall include the date, time, duration, and magnitude of all opacity exceedances that occurred during the reporting period. The report shall also include a description of all corrective actions taken and the results of such actions.

b) Fluidized Bed Combustor Baghouse Pressure Drop

- 1) The permittee shall monitor the pressure drop across the two baghouses continuously with a differential pressure gauge whenever the fluidized bed combustor is in operation. The baghouse pressure gauges must be calibrated quarterly, in accordance with the manufacturer recommended procedures. Records of each quarterly calibration shall be kept in accordance with Condition I.D.1- Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.
- 2) The pressure drop across the two baghouses shall be maintained between 2" and 8" w.c., or a SRCAA approved alternate range. At least once every hour, the instantaneous pressure drop across the baghouses must be recorded. The permittee shall recover valid pressure drop data for at least 98% of all hours that the baghouses operate during each month. At the end of each month, the pressure drop data recovery percentage shall be calculated and recorded. All records shall be kept in accordance with Condition I.D.1-Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.

- 3) If the pressure drop is outside of the acceptable range (i.e., 2" and 8" w.c., or a SRCAA approved alternate range), an excursion has occurred, and corrective action must be taken as soon as possible, but no later than 12 hours from discovery, to return the equipment to normal operation (i.e., pressure drop brought within acceptable range) and to prevent recurrence of the problem. If the equipment cannot be returned to normal operation within 12 hours, the baghouses and FBC shall be shut down until the problem has been fixed. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations. Records shall be kept of the date, time, duration, and magnitude of all pressure drop excursions. In addition, records shall be kept of all corrective actions taken and the results of such actions. All records shall be kept in accordance with Condition I.D.1- Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.
- 4) The permittee shall report all pressure drop excursions to SRCAA as part of the semiannual monitoring report, described in Condition I.D.6. The report shall include the date, time, duration, and magnitude of all pressure drop excursions that occurred during the reporting period. The report shall also include a description of all corrective actions taken and the results of such actions.

c) Fluidized Bed Combustor Baghouse Inlet Temperature

- 1) Whenever the FBC is in operation, the permittee shall continuously monitor the inlet temperature for both baghouses with a thermocouple, connected to a temperature monitor. The temperature gauge must be calibrated quarterly, in accordance with the manufacturer recommended procedures. Records of each quarterly calibration shall be kept in accordance with Condition I.D.1- Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.
- 2) Except during periods of fluidized bed combustor startup, the baghouse inlet temperature shall be maintained within a range of 250°F to 425°F. Periods of startup are limited to one hour per occurrence. At least once every hour, the instantaneous baghouse inlet temperature must be recorded. The permittee shall recover valid temperature data for at least 98% of all hours that the baghouse operates during each month. At the end of each month, the temperature data recovery percentage shall be calculated and recorded. All records shall be kept in accordance with Condition I.D.1- Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.
- 3) If the baghouse inlet temperature is outside of the acceptable range (i.e., 250°F to 425°F), an excursion has occurred, and corrective action must be taken as soon as possible, but no later than 12 hours from discovery, to return the equipment to normal operation (i.e., baghouse inlet temperature brought within acceptable range) and to

prevent recurrence of the problem. If the equipment cannot be returned to normal operation within 12 hours, the baghouses and FBC shall be shut down until the problem can be fixed. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations. Records shall be kept of the date, time, duration, and magnitude of all baghouse inlet temperature excursions. In addition, records shall be kept of all corrective actions taken and the results of such actions. All records shall be kept in accordance with Condition I.D.1- Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.

- 4) The permittee shall report all baghouse inlet temperature excursions to SRCAA as part of the semiannual monitoring report, described in Condition I.D.6. The report shall include the date, time, duration, and magnitude of all baghouse inlet temperature excursions that occurred during the reporting period. The report shall also include a description of all corrective actions taken and the results of such actions.
- d) If the permittee identifies an excursion or exceedance of an emission limitation for which this MRRR condition was designed to monitor, but did not provide an indication of an excursion or exceedance; or if testing results demonstrate that the indicator ranges given in this MRRR condition are not appropriate ranges for monitoring compliance, the permittee shall notify SRCAA and initiate procedures to modify this permit.

[NOC #1169, Conditions 8, 12, & 13, 12/30/03 as revised on 3/29/04, 6/10/05, 7/13/06, and 7/9/08] [40 CFR Part 64, 7/1/01]

12M. The following records shall be kept for the fluidized bed combustor:

- a) Records of types and amounts of natural gas and wood waste derived fuel burned in the FBC each day. Wood waste derived fuel shall include chip screen rejects, paper sludge, and de-inking sludge. In lieu of records of the amount of wood waste derived fuel burned each day, it is acceptable for the permittee to multiply the number of hours that the fluidized bed combustor operates each day by the maximum rated capacity of the fluidized bed combustor (i.e., 50 tons per day);
- b) Records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the fluidized bed combustor;
- c) Records of the occurrence and duration of any malfunction of the fluidized bed combustor's air pollution control equipment; and
- d) Records of the times and dates of bag failures and replacements for the fluidized bed combustor baghouse.

The records shall be kept for at least 5 years¹ following the date of the record. The records shall also be kept in accordance with Condition I.D.1- Records of Required Monitoring Information and Condition I.D.5 – Retention of Records and shall be made available to SRCAA staff or other authorized representatives.

[40 CFR §60.48c(g), 60.48c(i), 60.7(b), & 60.7(f), 1998] [NOC #1169, Conditions 3 & 14, 12/30/03 as revised on 4/29/04, 6/10/05, 7/13/06, and 7/9/08]

13M. The following shall function as Compliance Assurance Monitoring for the Ash Handling System:

a) Ash Handling Baghouse Pressure Drop

- 1) The permittee shall monitor the pressure drop across the ash handling baghouse continuously with a differential pressure gauge whenever the ash handling system is in operation. At least once every hour, the instantaneous pressure drop across the baghouse must be recorded. Hourly pressure drop records shall be kept in accordance with Condition I.D.1-Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.
- 2) The baghouse differential pressure gauge must be calibrated quarterly, in accordance with the manufacturer recommended procedures. Records of each quarterly calibration shall be kept in accordance with Condition I.D.1- Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.
- 3) The pressure drop across the ash handling baghouse shall be maintained within the following range: 2 to 15 inches of water. If the baghouse drop is outside of this acceptable range, an excursion has occurred, and corrective action must be taken as soon as possible, but no later than 12 hours from discovery, to return the equipment to normal operation (i.e., pressure drop brought within acceptable range) and to prevent recurrence of the problem. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations. Records shall be kept of the date, time, duration, and magnitude of all pressure drop excursions. In addition, records shall be kept of all corrective actions taken and the results of such actions. All records shall be kept in accordance with Condition I.D.1- Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.

¹ 40 CFR 60.7(f) and 60.48c(l) require that records be kept for at least two years. The requirement in WAC 173-401-615 that records be kept for five years supersedes the two year requirement.

- 4) The permittee shall report all pressure drop excursions to SRCAA as part of the semiannual monitoring report, described in Condition I.D.6. The report shall include the date, time, duration, and magnitude of all pressure drop excursions that occurred during the reporting period. The report shall also include a description of all corrective actions taken and the results of such actions.
- b) Ash Handling Baghouse Visible Emissions
- 1) At least once every week, the permittee shall perform inspections during daylight hours, while the ash handling baghouse is operating, for the purpose of monitoring the ash handling baghouse exhaust for the presence of visible emissions. Records shall be kept of the date, time, and results of each inspection, in accordance with Condition I.D.1- Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representative. If no visible emissions are observed from the ash handling baghouse, no corrective action is required. If visible emissions are observed, the following actions shall be taken:
 - i) If visible emissions are observed from the ash handling baghouse, an excursion has occurred, and the permittee must verify that all equipment is performing its normal, designed function and is being operated according to standard procedures. If any equipment is not performing as described, corrective action shall be initiated as soon as possible, but within 12 hours of discovery of the problem. The goal of the corrective action taken shall be to eliminate visible emissions as soon as possible and to prevent recurrence of the problem. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations. Records shall be kept of the date, time, duration, and magnitude of all excursions. In addition, records shall be kept of all corrective actions taken and the results of such actions. All records shall be kept in accordance with Condition I.D.1- Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives. If the corrective action taken results in a return to conditions under which visible emissions are not observable, no further corrective action is required.
 - ii) If after corrective action is taken, visible emissions are still observed, the permittee shall perform, or have performed, Ecology Method 9A and EPA Method 5 on the ash handling baghouse exhaust. The Ecology Method 9A and EPA Method 5 tests shall occur as soon as possible, but no later than 30 days after the subsequent observation of visible emissions. Records of all Ecology Method 9A and EPA Method 5 tests performed shall be kept in accordance with Condition I.D.1- Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives. If the visible emissions, as

determined by Ecology Method 9A, do not exceed any applicable opacity standards (i.e., standards given in Conditions II.A.2 or II.A.3), and the particulate emissions, as determined by EPA Method 5, do not exceed any applicable particulate standards (i.e., standard given in Condition II.A.11), no further corrective action is required.

- iii) If a violation of any applicable opacity standard (i.e., standards given in Conditions II.A.2 or II.A.3) is documented), and/or a violation of any applicable particulate standard (i.e., standard given in Condition II.A.11), an exceedance has occurred, and appropriate corrective action shall be initiated as soon as possible, but no later than 24 hours after discovery of the violation, to identify and correct the problem causing the exceedance. The goal of the corrective action taken shall be to achieve compliance with the opacity and particulate standards as soon as possible and to prevent recurrence of the problem. Once corrective action has been taken to address the problem, the permittee shall perform, or have performed, Ecology Method 9A (i.e., if an opacity exceedance occurred) and/or EPA Method 5 (i.e., if a particulate exceedance occurred) on the source of the emissions to demonstrate compliance with the opacity and/or particulate standards. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition I.D.7- Prompt Reporting of Deviations. Records of all Ecology Method 9A and EPA Method 5 tests performed shall be kept in accordance with Condition I.D.1- Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.
- 2) The permittee shall report all ash handling baghouse opacity excursions and opacity and/or particulate matter exceedances to SRCAA as part of the semiannual monitoring report, described in Condition I.D.6 The report shall include the date, time, duration, and magnitude of all excursions and exceedances that occurred during the reporting period. The report shall also include a description of all corrective actions taken and the results of such actions.
- c) Ash Transfer Line Vacuum
- 1) The permittee shall continuously monitor the vacuum in the ash transfer line with a differential pressure gauge whenever the ash handling system is in operation. At least once every hour, the pressure gauge reading from the ash transfer line must be recorded. Hourly pressure drop records shall be kept in accordance with Condition I.D.1-Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.
 - 2) The ash transfer line pressure gauge must be calibrated quarterly, in accordance with the manufacturer recommended procedures. Records of each quarterly calibration shall be kept in accordance with Condition I.D.1- Records of Required

Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.

- 3) The vacuum in the ash transfer line shall be maintained within the following range: 3 to 20 inches of water (vacuum). If the vacuum in the ash transfer line is outside of this range, an excursion has occurred, and corrective action must be taken as soon as possible, but no later than 12 hours from discovery, to return the equipment to normal operation (i.e., vacuum brought within acceptable range) and to prevent recurrence of the problem. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations. Records shall be kept of the date, time, duration, and magnitude of all pressure drop excursions. In addition, records shall be kept of all corrective actions taken and the results of such actions. All records shall be kept in accordance with Condition I.D.1- Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.
 - 4) The permittee shall report all ash transfer line vacuum excursions to SRCAA as part of the semiannual monitoring report, described in Condition I.D.6. The report shall include the date, time, duration, and magnitude of all excursions that occurred during the reporting period. The report shall also include a description of all corrective actions taken and the results of such actions.
- d) Ash Load-out
- 1) The permittee shall comply with either i) or ii) below:
 - i) If the fluidized bed combustor ash is to be shipped wet, prior to load-out, the ash shall be wetted to at least 15% moisture by weight. A moisture analyses must be performed no more than 24 hours prior to each load-out to verify that the required moisture content is being met. Records of the date and time of each ash load-out and the results from the each required moisture analyses shall be kept, in accordance with Condition I.D.1- Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representative. If the moisture analyses results show that the moisture content of the ash is below 15% by weight, an excursion has occurred, and corrective action must be taken before the ash is loaded out to bring the ash up to the required moisture content. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations. Records shall be kept of the date, time, duration, and magnitude of all excursions. In addition, records shall be kept of all corrective actions taken and the results of such actions. All records shall be kept in accordance with

Condition I.D.1- Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.

- ii) If the fluidized bed combustor ash is to be shipped dry, the load-out of ash must be completely enclosed. The permittee shall observe each ash load-out to assure no visible emissions leave the enclosure. Records of the date and time of each ash load-out and results of the observations of each load-out shall be kept, in accordance with Condition I.D.1- Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representative. If no visible emissions are observed, no corrective action is required. If visible emissions are observed, the following actions shall be taken:
 - A) If visible emissions are observed leaving the enclosure during an ash load-out, an excursion has occurred, and the permittee must verify that all equipment is performing its normal, designed function and is being operated according to standard procedures. If any equipment is not performing as described, corrective action shall be initiated as soon as possible, but no later than 12 hours after discovery of the problem. The goal of the corrective action taken shall be to eliminate visible emissions as soon as possible and to prevent recurrence of the problem. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations. Records shall be kept of the date, time, duration, and magnitude of all excursions. In addition, records shall be kept of all corrective actions taken and the results of such actions. All records shall be kept in accordance with Condition I.D.1- Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives. If the corrective action taken results in a return to conditions under which visible emissions are not observable, no further corrective action is required.
 - B) If after corrective action is taken, visible emissions are still observed, the permittee shall perform, or have performed, Ecology Method 9A and EPA Method 5 on the ash load-out enclosures. The Ecology Method 9A and EPA Method 5 tests must occur as soon as possible, but no later than 30 days after the subsequent observation of visible emissions. Records of all Ecology Method 9A and EPA Method 5 tests performed shall be kept in accordance with Condition I.D.1- Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives. If the visible emissions, as determined by Ecology Method 9A, do not exceed any applicable opacity standards (i.e., standards given in Conditions II.A.2-II.A.3), and the particulate emissions, as determined by EPA Method 5, do not exceed any applicable particulate standards (i.e., standard given in

Condition II.A.11), no further corrective action is required.

- C) If a violation of any applicable opacity standard (i.e., standards given in Conditions II.A.2-II.A.3) is documented), and/or a violation of any applicable particulate standard (i.e., standards given in Condition II.A.11), an exceedance has occurred, and appropriate corrective action shall be initiated as soon as possible, but no later than 24 hours after discovery of the violation, to identify and correct the problem causing the exceedance. The goal of the corrective action taken shall be to achieve compliance with the opacity and particulate standards as soon as possible and to prevent recurrence of the problem. Once corrective action has been taken to address the problem, the permittee shall perform, or have performed, Ecology Method 9A (i.e., if an opacity exceedance occurred) and/or EPA Method 5 (i.e., if a particulate exceedance occurred) on the source of the emissions to demonstrate compliance with the opacity and/or particulate standards. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations. Records of all Ecology Method 9A and EPA Method 5 tests performed shall be kept in accordance with Condition I.D.1- Records of Required Monitoring Information and Condition I.D.5-Retention of Records and, upon request, shall be made available to SRCAA staff or other authorized representatives.
- 2) The permittee shall report all ash load-out excursions and exceedances to SRCAA as part of the semiannual monitoring report, described in Condition I.D.6 The report shall include the date, time, duration, and magnitude of all excursions and exceedances that occurred during the reporting period. The report shall also include a description of all corrective actions taken and the results of such actions.
- e) If the permittee identifies an excursion or exceedance of an emission limitation for which this MRRR condition was designed to monitor but the MRRR condition did not provide an indication of an excursion or exceedance; or if testing results demonstrate that the indicator ranges given in this MRRR condition are not appropriate ranges for monitoring compliance, the permittee shall notify SRCAA and initiate procedures to modify this permit.

[40 CFR Part 64, 7/1/01]

14M. No later than the 15th of each month, the amount of pulp processed in refiner line #3 and #4 during the previous month shall be totaled and recorded. If the amount of pulp processed in either refiner line #3 or #4 during any month exceeds 2,950 oven dried tons, the amount of pulp processed in refiner line #3 and #4 during the last consecutive twelve month period shall be totaled and recorded. Records shall be kept in accordance with Condition I.D.5- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives. [NOC #1321, Condition 8, 12/21/05]

15M. The operation and maintenance plan for the reject refiner system (i.e., primary refiner and secondary refiner) shall be kept on site. Records shall be kept to document that the operation and maintenance requirements are being followed. Records shall include information required in Condition I.D.1- Records of Required Monitoring Information. Records shall be kept in accordance with Condition I.D.6- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives. [WAC 173-401-615(1) & (2), 9/16/02] – NOTE: This is a gapfilling MRRR.

16M. Records shall be kept of the total amount of oven dried pulp processed in the primary and secondary reject refiners each day. Records shall include information required in Condition I.D.1- Records of Required Monitoring Information. Records shall be kept in accordance with Condition I.D.6- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives. [NOC #1096, Condition 5, 10/19/01 as revised on 4/16/02 and 6/7/05]

17M. Within 90 days after the reject refiner system achieves a potential throughput of 100 tons of oven dried pulp per day, a stack test shall be performed on the primary and secondary refiner exhausts to quantify the chloroform emissions. The testing, specified below, shall be conducted, unless alternate test methods or equivalent tests are requested in writing and approved by SRCAA:

- a) The source test plan is subject to SRCAA approval. It is the responsibility of the permittee to submit the source test plan sufficiently in advance for SRCAA to review and approve the plan, prior to the test.
- b) During the test, the primary and secondary refiners shall be operated as close to 100% of the maximum capacity as possible (i.e., 100 tons of oven dried pulp per day).
- c) The source test shall consist of three separate test runs.
- d) The following constituents shall be measured during each test run:
 - i. Volumetric flow rate, per EPA Method 1; and
 - ii. Chloroform, per EPA Method TO-14.
- e) A report, detailing the source test results, shall be submitted to SRCAA for approval no later than 45 days after each test is performed. If the results show that total chloroform emissions from the reject refining system (primary and secondary refiners) are lower than 10 pounds per year (Small Quantity Emission Rate for chloroform given in Chapter 173-460 WAC), no further analysis is required. However, if the results show that total chloroform emissions from the reject refining system are higher than 10 pounds per year, the permittee must submit an analysis to SRCAA which demonstrates ambient impact compliance for chloroform, according to the requirements given in WAC 173-460-080. If the permittee cannot demonstrate compliance with the requirements of WAC 173-460-080 for chloroform, a request for a second tier analysis, according to WAC 173-460-090, shall be submitted to SRCAA.

[NOC #1096, Condition 6, 10/19/01 as revised on 4/16/02 and 6/7/05]

18M. An operation and maintenance (O&M) plan shall be developed and implemented within 30 days of start-up of the wood chip storage and handling system. The O&M plan shall include a description and schedule for periodic inspections of the equipment to ensure there are no leaks which would cause particulate emissions. Records shall be kept for the previous 5 years of operation of the dates and results of all equipment inspections performed and dates and nature of any other maintenance performed. Records shall be kept in accordance with Condition I.D.5-Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives. [NOC #1250, Condition 3, 1/13/05 – STATE / LOCAL ONLY]

19M. Maintenance records shall be kept for the #5 TMP system and heat recovery system for the previous 5 years of operation and made available to SRCAA personnel upon request. [NOC #1463, Condition 6, 8/13/09]

20M. Records shall be kept of the amount of oven dried pulp processed in the #5 TMP each day. Records shall be kept for the previous 5 years of operation and made available to SRCAA personnel upon request. [NOC #1463, Condition 8, 8/13/09]

21M. By no later than January 20, 2014, the permittee shall submit an Initial Notification to EPA, Region 10. The Initial Notification shall contain the information specified in 40 CFR 63.9(b), and signed by a responsible official. Records must be kept of the Initial Notification submitted to EPA. All records shall be kept in accordance with Condition I.D.1-Records of Required Monitoring Information and Condition I.D.5-Retention of Records. [40 CFR 63.11225, 2/1/13]

22M. By no later than July 19, 2014, the permittee shall submit a Notification of Compliance Status Report to EPA, Region 10. The Notification of Compliance Status Report shall include the information and certification(s) of compliance as described in 40 CFR 63.11225(4)(i)-(v), as applicable, and signed by a responsible official. Records must be kept of the initial tune-up and energy assessment performed, and of Notification of Compliance Status Reports submitted to EPA. All records shall be kept in accordance with Condition I.D.1-Records of Required Monitoring Information and Condition I.D.5-Retention of Records. [40 CFR 63.11225, 2/1/13]

23M. Beginning in 2015, by no later than March 1 of every calendar year, a compliance certification report shall be prepared, and upon request, submitted to EPA, Region 10, or delegated authority. The compliance certification report shall contain the information specified in 40 CFR 63.11225(b)(1)&(2) and include records of the most recent biennial tune-up. Records of compliance certification reports shall be kept in accordance with Condition I.D.1-Records of Required Monitoring Information and Condition I.D.5-Retention of Records. [40 CFR 63.11225 2/1/13]

III. PERMIT SHIELD

A. INAPPLICABLE REQUIREMENTS

The requirements listed in this section do not apply to the source, or to the specific emission units specified below, provided that such applicable requirements are included in and specifically identified in the permit. The permit shield applies to all requirements so identified. Citations to requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are therefore not enforceable by the Administrator and citizens under the FCAA. [WAC 173-401-640(2), 10/4/93]

1PS. New Source Performance Standards for Fossil Fuel-Fired Industrial Steam

Generators. #2 Boiler, rated at 120 MMBTU/hour, was constructed in 1959. The boiler has not been modified or reconstructed, as defined in 40 CFR Part 60, since installation. Because of the construction date and heat input rating of #2 Boiler, 40 CFR 60, Subparts D and Db do not apply to this boiler. Subpart D applies only to boilers rated at more than 250 MMBTU/hour. Subpart Db applies only to boilers constructed, modified or reconstructed after June 19, 1984. [40 CFR 60, Subparts D & Db, 1999]

2PS. New Source Performance Standards for Fossil Fuel-Fired Industrial Steam

Generators. #1 Boiler, rated at 48 MMBTU/hour, was constructed in 1955. The boiler has not been modified or reconstructed, as defined in 40 CFR Part 60, since installation. Because of the construction date and heat input rating of #1 Boiler, 40 CFR 60, Subpart Dc does not apply to this boiler. Subpart Dc applies only to boilers constructed, modified or reconstructed after June 9, 1989. [40 CFR 60, Subpart Dc, 1999]

3PS. State Regulation for Solid Waste Incineration Facilities. Chapter 173-434 WAC, SOLID WASTE INCINERATOR FACILITIES applies to all solid waste incinerators designed to burn 12 tons or more per day. Solid waste is defined in the rule to exclude wood waste or sludge from waste water treatment plants. The sludge burned in the permittee's fluidized bed combustor is sludge from the facility's wastewater treatment plant. Because the sludge is, by definition, not solid waste, this rule does not apply to the permittee's fluidized bed combustor. [Chapter 173-434 WAC, 12/22/03]

4PS. State Regulation Establishing Emission Standards for VOC Sources Located in Ozone Nonattainment Areas. Chapter 173-490 WAC, Emission Standards and Control for Sources of VOCs, applies only to areas that have been designated as nonattainment for ozone. In addition, the rule only regulates specific categories of VOC sources. Because Spokane County has not been designated as a nonattainment area for ozone, the rule does not apply. [Chapter 173-490 WAC, 2/2/98]