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Effective Date: February 1, 2021  
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**AIR OPERATING PERMIT 0000809**

In compliance with the provisions of The State of Washington  
Clean Air Act Chapter 70.94 Revised Code of Washington

**Cosmo Specialty Fibers, Inc.  
Cosmopolis Pulp Mill  
1701 1st Street  
P.O. Box 539  
Cosmopolis, Washington 98537**

is authorized to operate in accordance with the terms and conditions  
of this permit.

Issued by:  
State of Washington  
DEPARTMENT OF ECOLOGY  
300 Desmond Drive  
PO Box 47600  
Olympia, Washington 98504-7600



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## INTRODUCTION AND LEGAL AUTHORITY

This Air Operating Permit is described under the Operating Permit Regulation, Chapter 173-401 WAC. The provisions of this permit describe the emissions limitations, operating requirements, monitoring and recording requirements, and reporting frequencies for the permitted source.

Cosmo Specialty Fibers, Inc. (Cosmo) at Cosmopolis, Washington requires a Title V Air Operating Permit (AOP) because it emits or has the potential to emit, one hundred tons or more, each year, of one or more regulated air pollutants [WAC 173-401-300(1)].

During the drafting of this permit, the Washington Department of Ecology (Ecology or DOE) has attempted to incorporate requirements using the exact language of the law, regulation, or order. Where there is a difference in language, this difference is presented in this permit only for clarification of the underlying requirement. The legal requirement remains the underlying requirement. Any conflict between the permit and an underlying requirement that is not acknowledged in this permit, nor is addressed in past orders or permits referenced in this permit or its Support Document, will be resolved by referring to the underlying requirement. Unless otherwise stated, the effective date of referenced regulations or statutes is that of the provisions in effect on the date of permit issuance. Compliance with the underlying requirements shall be demonstrated using the methods specified in this Permit.

The Title V AOP consists of all parts of this assembled document including all Appendices, but does not include the accompanying Support Document, or the Title V permit application materials submitted by the Cosmo mill, nor any other past orders or permits.

Unless otherwise defined in the permit, the definition of terms contained in WAC 173-401-200 and defined in all referenced regulations, apply to this permit. All terms and conditions, except state-only requirements, are enforceable under the Federal Clean Air Act (FCAA). State-only requirements are specifically identified in the permit.

## **EMISSION UNIT SPECIFIC REQUIREMENTS [WAC 173-401-600]**

The emission units covered by Conditions A through I are subject to the following emission limits, monitoring, and reporting requirements. These units are also subject to the Facility-Wide applicable requirements and the associated monitoring, recordkeeping and reporting requirements for these limits, in the Facility-Wide section of this permit.

Unless specified otherwise, the basis of authority for the type and frequency of monitoring imposed in conditions A through I, is WAC 173-401-615 or 630(1). All conditions in A through I are enforceable under the Federal Clean Air Act, except those noted as **state only**.

Insignificant emission units (IEUs) are subject to requirements contained in the Facility-Wide section, however are not subject to testing, monitoring, recordkeeping, reporting or certification requirements, unless the generally applicable requirements in the State Implementation Plan (SIP) impose them. [WAC 173-401-530(2)(c)].

Refer to Permit Appendix C for emission estimate algorithms. Throughout the permit, the reference test method (RM) or compliance determination algorithm is identified in the column titled "Monitoring and Reporting." These algorithms set forth the manner by which emissions are calculated for those requirements for which the RM itself does not directly result in an emissions estimate. The Permittee may use an equivalent method with prior written approval obtained from Ecology.

**A. Recovery Boilers No. 1, No. 2, and No. 3 common stack (AP-10)**

Condition	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
A.1	Particulate Matter (PM)	0.10 gr/dscf @ 8% O <sub>2</sub>	<p>The Permittee shall perform a DOE Method 5, or other Ecology approved method, source test and record results once per quarter and report the results in the monthly air emissions report. The averaging time is the time that each test is run in order to obtain the required volume of sample. The minimum averaging time is 60 consecutive minutes. Testing shall be done in any quarter when the pulp production is above 80% of the previous month's production.</p> <p>If the test result exceeds 80% of the permit limit, testing frequency shall return to monthly until four consecutive tests are below 80% of limit.</p> <p>See A.2b for the minimum operational requirement intended to indicate compliance. The Permittee shall report any excursions and any associated corrective actions in the respective monthly air emissions report.</p>	WAC 173-410-040(2)(a) Orders No. DE 95AQ-I034 and No. 2484 AQ-05 (Attachment B)
A.2a	Opacity	Average 35% or less for any six (6) consecutive minutes in any one-hour period	<p>DOE Method 9B is the reference test method.</p> <p>The Permittee shall perform DOE Method 9B in either one or both of the following conditions: (1) A malfunction in of any of the recovery boilers, or (2) a malfunction or failure of one or more recirculation pumps in Condition A.2b.</p>	WAC 173-410-040(3) Order No. DE 95AQ-I034 (Attachment B)

Condition	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
			The Permittee shall report opacity violations and excursions in the respective monthly air emissions report.	

**A.2b Operating Parameter:**

Continuous operation of the recirculation pumps for the recovery boilers absorption towers, except during pump. During pump maintenance, one of the pumps may be out of service for periods of no greater than 72 hours. Continuous operation of the recirculation pumps is only required when burning spent sulfite liquor in Recovery Boiler No. 1, No. 2, and/or No.3. Once per shift, the operator shall take visual readings of the pumps and record how many pumps are in service. The Permittee shall report the result of the pump readings in the respective monthly air emissions report. [WAC 173-410-062(5), WAC 173-410-040(4) for operations and maintenance, Order No. DE 95AQ-I034 (Attachment B)]

Condition	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
A.3	Sulfur dioxide (SO <sub>2</sub> )	800 ppm, hourly average	<p>The Permittee shall continuously monitor SO<sub>2</sub> concentration from the common stack using a CEMS that conforms to 40 CFR Part 60, Appendix B, Performance Specification 2, and the quality assurance procedures outlined in 40 CFR Part 60, Appendix F. See Facility-Wide condition #31 for additional requirements.</p> <p>SO<sub>2</sub> values shall be averaged on an hourly basis. The daily hourly averages shall start on the clock hour at 0000 hours and end at 2400 hours.</p> <p>The Permittee shall report the results in the monthly air emissions report. The Permittee shall submit the Data Assessment Report, in accordance with Performance Specification 2, with the monthly air emissions report.</p>	WAC 173-401-615(4) and 173-410-040(1) (d)

A.4a Non-Condensable Gases (NCGs):

The Permittee shall burn NCGs in one or both of Recovery Boilers No. 1 and No. 2, except during startup or emergency shutdown. For safety reasons, during startup and emergency shutdowns, NCGs may be vented to the cooling towers until the gases can be re-routed to an operational boiler. NCGs must be re-routed to an operational boiler in a timely manner. Timely manner is defined as one (1) hour.

The Permittee shall maintain records showing NCG combustion status and boiler maintenance or emergency shutdown activities that interrupt NCG combustion. All NCG bypasses shall be recorded.

All bypasses of NCGs longer than one hour shall be reported with the respective monthly air emissions report. [Order No. 96AQ-I089 issued per WAC 173-400-113 for BACT and T-BACT]

A.4b Weak oxygen storage tank (EV-21) and COEL storage tank (EV-22):

The Permittee shall keep records of the dimensions and the analysis showing the capacity of tanks EV-21 and EV-22 for the life of the vessels. [40 CFR 60.116b(a) and (b)]

The following **state-only** requirements are not federally enforceable under the Federal Clean Air Act.

Condition	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
A.5	Sulfur dioxide	360 ppm hourly average	<p>The Permittee shall continuously monitor the SO<sub>2</sub> concentration of the common stack emissions using a CEMS that conforms to 40 CFR Part 60, Appendix B, Performance Specification 2, and the quality assurance procedures outlined in 40 CFR Part 60, Appendix F. See Facility-Wide condition #31 for additional requirements.</p> <p>SO<sub>2</sub> values shall be averaged on an hourly basis. The daily hourly averages shall begin at 00:00 and end at 23:59.</p> <p>The Permittee shall report the monitoring results in the respective monthly air emissions report. The Permittee shall submit the Data Assessment Report, in accordance with Performance Specification 2, with the respective monthly air emissions report.</p>	Order No. DE 95AQ-I034 (Attachment B)
A.6	Total reduced sulfur (TRS) compounds (Hydrogen Sulfide as a surrogate)	17.5 ppm daily average	The Permittee shall continuously monitor and record the hydrogen sulfide concentration of the common stack emissions with a CEMS that conforms to 40 CFR Part 60, Appendix B, Performance Specification 5, and the quality assurance procedures outlined in 40 CFR Part 60, Appendix F. See Facility-Wide condition #31 for additional requirements.	WAC 173-410-040(5)



Condition	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
			The Permittee shall report the results of the monitoring in the respective monthly air emissions report. The Permittee shall submit the Data Assessment Report, in accordance with Performance Specification 5, with the respective monthly air emissions report.	

**B. Hogged Fuel Dryer (HD-14)**

Condition	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
B.1	Opacity	Average of 20% for more than three (3) consecutive minute in any one hour	<p>The Permittee shall monitor for opacity using DOE Test Method 9A as the reference test method.</p> <p><i>Compliance Assurance Monitoring:</i> The Permittee shall comply with the general CAM requirements in Condition B4.e through B4.h. The Permittee must comply with the monitoring and corrective action requirements in Conditions B.4a through B.4j.</p> <p>CAM reporting required on at a minimum semiannual basis.</p>	<p>WAC 173-400-040(2)</p> <p>Order No. DE 95AQ-I034 (Attachment B)</p> <p>40 CFR 64.2 and 64.6 through 64.9 for respective opacity CAM monitoring and reporting/recordkeeping</p>

Condition	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
B.2	Sulfur dioxide	1000 ppm, uncorrected for oxygen	<p>The Permittee shall certify to Ecology annually that the hogged fuel dryer only burned wood waste or diesel during the preceding year. The certification must be submitted in then December monthly air emissions report that is due January 15<sup>th</sup>.</p> <p>In the event that the Permittee burns fuel oil to heat the fluidized bed, the Permittee shall certify that the fuel oil had sulfur content of no greater than 2 percent.</p>	<p>WAC 173-410(1)(f)</p> <p>Order No. DE 95AQ-I034 (Attachment B)</p>
B.3a	Particulate matter (PM)	0.10 gr/dscf	<p>Compliance demonstration with B.3b below is used to demonstrate compliance with this limit.</p> <p>Refer to B.3b for Performance Testing and Compliance Assurance Monitoring requirements.</p>	<p>WAC 173-410-040(2)(c)(iii)</p> <p>Order DE 95AQ-I034</p> <p>40 CFR 64.2 and 64.6 through 64.9 for respective PM CAM monitoring and reporting/recordkeeping</p>
B.3b	Particulate matter (PM) (surrogate for HAP metals for 40 CFR Part 63 Subpart MM limit)	≤ 10 lbs per hour	<p><i>Performance Testing:</i></p> <p>The Permittee shall monitor using EPA Reference Method 5 or 29 in Appendix A of 40 CFR Part 60. Method 17 in Appendix A of 40 CFR Part 60 may be used in lieu of Method 5 or 29 if a constant value of 0.009 g/dscm (0.004 gr/dscf) is added to the results of Method 17 and the stack temperature is no greater than 205°C (400°F). For Methods 5, 29 and 17, the</p>	<p>WAC 173-400-075(6) incorporates 40 CFR Part 63, Subpart MM by reference</p> <p>40 CFR 63.862(d) and 63.865(b)(1)</p> <p>Order No. DE 03AQIS-5813, Conditions A, B2 and E</p>

Condition	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
			<p>sampling time and sample volume for each run must be at least 60 minutes and 0.90 dscm (31.8 dscf) and water must be used as the cleanup solvent instead of acetone in the sample recovery procedure.</p> <p>The Permittee must demonstrate that PM from the hogged fuel dryer meets the standard once every five years. Test results must be submitted within 60 days after the completion of the performance test. Results must be submitted to EPA via CEDRI and to Ecology. Submit stack test report no later than 60 days after the stack test is performed.</p> <p><i>Compliance Assurance Monitoring:</i> The Permittee shall comply with the general CAM requirements in Condition B4.d and B4.e. The Permittee must comply with the monitoring and corrective action requirements in Conditions B.4a through B.4j.</p> <p>CAM reporting required on a semiannual basis, at a minimum.</p>	

B.4a Compliance and Records:

The Permittee must develop and implement a written startup, shutdown, and malfunction plan that contains specific procedures to be followed for operating and maintaining the hogged fuel dryer and fabric filter during periods of startup, shutdown, and malfunction, and a program of corrective action if the hogged fuel dryer or fabric filter malfunction. [WAC 173-400-075(6) incorporates MACT by reference, 40 CFR 63.866(a), Order No. DE 03AQIS-5813 per Condition B3]

B.4b Compliance and Records:

The Permittee shall take corrective action as specified in its startup, shutdown, and malfunction plan whenever the bag leak detection alarm sound. [WAC 173-400-075(6) incorporates MACT by reference, 40 CFR 63.864(1)(k)(iv), and Order No. DE 03AQIS-5813 per Condition B4]

B.4c Compliance and Records:

The Permittee shall record each alarm, the time of the alarm, the time corrective action was initiated and completed, a brief description of the cause of the alarm, and the corrective action taken. [WAC 173-400-075(6) incorporates MACT by reference, 40 CFR 63.866(c)(7), and Order No. DE 03AQIS-5813 per Condition B5]

B.4d Corrective Action:

The Permittee must initiate corrective action within one (1) hour of a bag leak detection alarm. The Permittee is in violation if corrective action is not completed in accordance with the startup, shutdown, and malfunction plan; or if the alarm is engaged for more than five (5) percent of the total operating time during a six (6) month block reporting period.

In calculating the operating time fraction, if inspection of the fabric filter demonstrates that no corrective action is required, no alarm time is counted; if corrective action is required, each alarm is counted as a minimum of 1 hour; or if corrective action is not initiated within 1 hour, the alarm time is counted as the actual amount of time taken to initiate corrective action. [WAC 173-400-075(6) incorporates MACT by reference, 40 CFR 63.864(k)(2)(v), Order No. DE 03AQIS-5813 per Condition B6]

B.4e Leak Detection System:

The Permittee shall continuously monitor the performance of the fabric filter using a bag leak detection system with audible alarm system.

The Permittee shall install, calibrate, maintain, and operate each triboelectric bag leak detection system, or equivalent system, according to the Fabric Filter Bag Leak Detection Guidance (EPA-454/R-98-015, September 1997). This document is available from the U.S. Environmental Protection Agency (U.S. EPA); Office of Air Quality Planning and Standards; Emissions, Monitoring and Analysis Division; Emission Measurement Center, MD-D205-02, Research Triangle Park, NC 27711. This document is also available on the Technology Transfer Network under Emission Measurement Center Continuous Emission Monitoring.

The Permittee shall install, calibrate, maintain and operate other types of bag leak detection system in a manner consistent with the manufacturer's written specification and recommendations. [WAC 173-400-075(6) incorporates MACT by reference, 40 CFR 63.864(e)(12)(i), Order No. DE 03AQIS-5813, per Condition C1]

**B.4f Leak Detection System:**

The bag leak detection system must:

- Be certified by the manufacturer to be capable of detecting PM emissions at concentrations of 10 mg/acm (0.0044 gr/acf) or less;
- Provide an output of relative PM loadings; and
- Be equipped with a device to continuously record the output signal from the sensor.

[WAC 173-400-075(6) incorporates MACT by reference, 40 CFR 63.864(e)(12)(ii), (iii) and (iv), Order No. DE 03AQIS-5813, per Conditions C2, C3, C4]

**B.4g Leak Detection System:**

The bag leak detection system must be equipped with an audible alarm system that will sound automatically when an increase in relative PM emissions over a present level is detected. The alarm must be location where it is easily heard by plant operating personnel. [WAC 173-400-075(6) incorporates MACT by reference, 40 CFR §63.864(e)(12)(v), Order No. DE 03AQIS-5813, Condition C5]

**B.4h Leak Detection System:**

For positive pressure fabric filter systems, a bag leak detector must be installed in each baghouse compartment or cell. For negative pressure or induce air fabric filter, the bag leak detector must be installed downstream of the fabric filter. Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors. [WAC 173-400-075(6) incorporates MACT by reference, 40 CFR 63.864(e)(12)(vi),(vii), and (viii), Order No. DE 03AQIS-5813, Condition C6, C7, C8]

**B.4i Leak Detection System – Recordkeeping:**

The baseline output must be established by adjusting the range and the averaging period of the device and establishing the alarm set points and alarm delay time according to Section 5.0 of the Fabric Filter Bag Leak Detection Guidance. The Permittee shall record each adjustment.

Following the initial adjustment of the system, the sensitivity or range, average period, alarm set points, or alarm delay time may not be adjusted except as detailed in the site-specific monitoring plan. In no case may the sensitivity be increased by more than 100 percent or decreased more than 50 percent over a 365-day period unless such adjustments follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating conditions. [WAC 173-400-075(6) incorporates MACT by reference, 40 CFR 63.864(e)(12)(ix) and (x), Order No. DE 03AQIS-5813, Condition C9, C10]

B.4j Leak Detection System - Recordkeeping:

The Permittee must record the result of each inspection, calibration, and validation check.  
[WAC 173-400-075(6) incorporates MACT by reference, 40 CFR §63.864(e)(12)(xi),  
Order No. DE 03AQIS-5813, Condition C9, C10]

### C. Hogged Fuel Boiler (PH-42)

Condition	Parameter	Limit (shall not exceed)/ Operating Parameter	Monitoring & Reporting	Applicable Requirements
C.1a	Opacity	<p>Average of 20% for any 3 minute period, within any one hour period</p> <p>During soot blowing or grate cleaning, opacity shall not exceed 20% for more than 15 consecutive minutes, once every 8 hours</p>	<p><i>Reference Test Method:</i> The Permittee shall monitor for opacity using DOE Method 9A as the referenced test method. The permittee shall perform Method 9A if one or more of the following condition occurs: (1) a malfunction in the hogged fuel boiler; (2) shutdown of the hogged fuel boiler scrubber; or (3) failure to meet minimum operating parameters in C.2a. When the scrubber is shut down for any reason emissions shall continue to meet the 20% opacity limit for any 3 minutes prior within any one hour period.</p> <p>The Permittee shall notify Ecology of any changes to the soot blowing or grate cleaning schedule.</p> <p><i>Compliance Assurance Monitoring:</i> The Permittee shall comply with the general CAM requirements in Condition C2.a. The Permittee must comply with the monitoring and corrective action requirements in Condition C.2a and C.2b.</p> <p>CAM reporting required on at a minimum semiannual basis.</p>	<p>WAC 173-400-040(2) and 173-400-070(2)</p> <p>Order No. DE 95AQ-I034 (Attachment B)</p> <p>40 CFR 64.2 and 64.6 through 64.9 for respective PM CAM monitoring and reporting/recordkeeping</p>
C.1b	Opacity	As specified in the rule, this limit and associated requirements will	<p><i>Reference Test Method:</i> The Permittee shall monitor for opacity using DOE Method 9A as the referenced test method. The Permittee shall perform Method 9A if one or more of the following</p>	WAC 173-400-040(2)(a)(ii) and 173-400-070(2)

Condition	Parameter	Limit (shall not exceed)/ Operating Parameter	Monitoring & Reporting	Applicable Requirements
		<p>be in effect on the effective date of EPA's removal of WAC 173-400-107 (9/20/93 version) from the SIP:</p> <p>Average of 20% for any 3 minute period, within any one hour period</p> <p>During soot blowing or grate cleaning, opacity shall not exceed 40% for up to 15-minute period in any eight consecutive hours</p>	<p>condition occurs: (1) a malfunction in the hogged fuel boiler; (2) shutdown of the hogged fuel boiler scrubber; (3) failure to meet minimum operating parameters in C.2a. When the scrubber is shut down for any reason, emissions shall continue to meet the 20% opacity limit for any 3 minutes within any one hour period.</p> <p>The Permittee shall notify Ecology of any changes to the soot blowing or grate cleaning schedule.</p> <p><i>Compliance Assurance Monitoring:</i> The Permittee shall comply with the general CAM requirements in Condition C2.a. The Permittee must comply with the monitoring and corrective action requirements in Condition C.2a and C.2b.</p> <p>CAM reporting required on at a minimum semiannual basis.</p>	<p>40 CFR 64.2 and 64.6 through 64.9 for respective PM CAM monitoring and reporting/recordkeeping</p>
C.2a	Opacity, Particulate Matter	Scrubber flow must be $\geq 605$ gpm, scrubber pressure drop ( $\Delta P$ ) must $\geq 10$ inch of water	The Permittee shall continuously monitor and record flow and pressure drop across the Hogged Fuel Boiler's scrubber. Minimum flow and pressure drop for the scrubber shall be maintained while the Hogged Fuel Boiler is in operation. The Permittee shall record any excursions in the respective monthly air emissions report.	<p>WAC 173-410-040(4) and WAC 173-401-615(4)</p> <p>Order No. DE 95AQ-I034 (Attachment B)</p>



Condition	Parameter	Limit (shall not exceed)/ Operating Parameter	Monitoring & Reporting	Applicable Requirements
			Compliance with operating requirements indicates compliance with the opacity and particulate matter limits.	

**C.2b Corrective Action:**

When operating conditions of the scrubber do not meet the operational requirements in C.2a, the Permittee shall take corrective action within the shortest practical time but no longer than four hours and the Permittee must perform DOE test Method 9A. Failure to take corrective action is a violation of WAC 173-410-040(4) and the underlying requirements, unless compliance can be demonstrated with applicable reference method.

The Permittee shall report in the respective monthly air emissions report all instances where the facility operates without meeting the operational requirement and any corrective action. Ecology does not require the Permittee to report instances where the scrubber's minimum operational requirement is exceeded for less than 3 minutes during any one hour period. [WAC 173-410-404(4) and WAC 173-401-615(4), 40 CFR Part 64, Order No. DE 95AQ-I034 (Attachment B)]

Condition	Parameter	Limit (shall not exceed)/Other Requirements	Monitoring & Reporting	Applicable Requirements
C.3	Particulate Matter	0.1 gr/dscf @ 7% O <sub>2</sub>	<p><i>Performance Testing:</i> The Permittee shall monitor once per year for particulate matter using DOE Method 5 or other Ecology approved method.</p> <p>The Permittee shall perform the Method 5 source test while steam production is above 80% of the previous month's average steam production. The averaging time for each test run is the time required to obtain the required volume of sample.</p>	<p>WAC 173-410-040(2)(c)(iii)</p> <p>Order No. DE 95AQ-I034 (Attachment B)</p> <p>40 CFR 64.2 and 64.6 through 64.9 for respective PM CAM</p>

Condition	Parameter	Limit (shall not exceed)/Other Requirements	Monitoring & Reporting	Applicable Requirements
			<p>The minimum averaging time is sixty (60) minutes. The Permittee shall record and report the results to Ecology once per year. The results must submitted to Ecology within sixty (60) days of completion of the test.</p> <p><i>Compliance Assurance Monitoring:</i> The Permittee shall comply with the general CAM requirements in Condition C2.a. The Permittee must comply with the monitoring and corrective action requirements in Condition C.2a and C.2b.</p> <p>CAM reporting required on at a minimum semiannual basis.</p>	<p>monitoring and reporting/recordkeeping</p>
C.4	Sulfur dioxide	1,000 ppm at 7% O <sub>2</sub>	<p>The Permittee shall record the sulfur content of the fuel oil being burned in the Hogged Fuel Boiler on each delivery.</p> <p>The Permittee shall certify to Ecology annually, in the January monthly air emissions report , that each delivery for the preceding year had a sulfur content of no greater than 2 percent</p>	<p>WAC 173-410-040(1)(f)</p> <p>Order No. DE 95AQ-I034 (Attachment B)</p>
C.5	HAPs (Particulate Matter as surrogate)	0.44 lb PM/MMBtu of heat input, except	<p>The Permittee shall conduct performance test annually using EPA Method 5. Testing shall be in accordance with §63.7520. Annual tests must be no more than 13 months apart.</p>	<p>40 CFR 63.7500(a), 40 CFR Part 63, Subpart DDDDD, Table 2 (Item 13b) for limits</p>

Condition	Parameter	Limit (shall not exceed)/Other Requirements	Monitoring & Reporting	Applicable Requirements
		<p>during startup and shutdown.</p> <p>See C.9c and C.9d for applicable requirements during startup and shut down.</p>	<p>If the test results are at or below 75 percent of the limit for at least 2 consecutive years and there are no changes in the operation of the boiler or control equipment that could increase emissions, the permittee may choose to conduct performance test every third year and the test must be conducted no later the 37 months after the previous performance test. Annual testing frequency must resume if a performance test exceeds 75 percent of the emission limit.</p> <p>The site-specific test plan must be submitted in accordance to §63.7(c), 60 days before the scheduled test date. Test results must be submitted within 60 days after the completion of the performance test. Results must be submitted to EPA via CEDRI and to Ecology.</p>	<p>40 CFR Part 63, Subpart DDDDD Table 5 (Item 1), 40 CFR 63.7515 and 63.7520 for performance testing</p> <p>40 CFR 63.7(c) for test plan</p> <p>40 CFR 63.7575(f) test submittal</p>
C.6	HAPs (CO as a surrogate)	<p>3,500 ppm<sub>dv</sub> CO at 3% O<sub>2</sub>, average of 3 runs, except during startup and shutdown.</p> <p>See C.9c and C.9d for applicable requirements</p>	<p>The Permittee shall conduct a performance test annually using EPA Reference Method 10. Testing shall be in accordance with §63.7520. Annual tests must be no more than 13 months apart.</p> <p>If the test results are at or below 75 percent of the limit for at least 2 consecutive years and there are no changes in the operation of the boiler or control equipment that could increase emissions, the Permittee may choose to conduct a performance test every three years. The test must</p>	<p>40 CFR 63.7500(a), 40 CFR Part 63, Subpart DDDDD, Table 2 (Item 13a) for limits</p> <p>40 CFR Part 63, Subpart DDDDD Table 5 (Item 5), 40 CFR 63.7515 and 63.7520 for performance testing</p>

Condition	Parameter	Limit (shall not exceed)/Other Requirements	Monitoring & Reporting	Applicable Requirements
		during startup and shut down.	<p>be conducted no later the 37 months after the previous performance test. The annual testing frequency must resume if a performance test exceeds 75 percent of the emission limit.</p> <p>The site-specific test plan must be submitted in accordance to §63.7(c), 60 days before the scheduled test date. Test results must be submitted within 60 days after the completion of the performance test. Results must be submitted to EPA and Ecology via CEDRI.</p>	<p>40 CFR 63.7(c) for test plan</p> <p>40 CFR 63.7575(f) test submittal</p>
C.7	HAPs (HCl as surrogate)	<p>0.022 lbs HCl/MMBtu of heat input, except during startup and shutdown.</p> <p>See C.9c and C.9d for applicable requirements during startup and shutdown.</p>	<p>The Permittee shall conduct performance test annually using EPA Reference Method 26 or 26A. Testing shall be in accordance with §63.7520. Annual tests must be no more than 13 months apart.</p> <p>If the test results are at or below 75 percent of the limit for at least 2 consecutive years and there are no changes in the operation of the boiler or control equipment that could increase emissions, the Permittee may choose to conduct performance test every third year. The test must be conducted no later the 37 months after the previous performance test. The annual testing frequency must resume if a performance test exceeds 75 percent of the emission limit.</p>	<p>40 CFR 63.7500(a), 40 CFR Part 63, Subpart DDDDD, Table 2 (Item 1a) for limits</p> <p>40 CFR Part 63, Subpart DDDDD Table 5 (Item 3), 40 CFR 63.7515 and 63.7520 for performance testing</p> <p>40 CFR 63.7(c) for test plan</p> <p>40 CFR 63.7575(f) test submittal</p>

Condition	Parameter	Limit (shall not exceed)/Other Requirements	Monitoring & Reporting	Applicable Requirements
			<p>The site-specific test plan must be submitted in accordance to §63.7(c) 60 days before the scheduled test date. Test results must be submitted within 60 days after the completion of the performance test. Results must be submitted to EPA and Ecology via CEDRI.</p>	
C.8	Mercury (Hg)	<p>5.7E-06 lb/MMBtu of heat input, except during startup and shutdown.</p> <p>See C.9c and C.9d for applicable requirements during startup and shut down.</p>	<p>The Permittee shall conduct performance test annually using EPA Reference Method 29, 30A, or 30B or 101A. Testing shall be in accordance with §63.7520. Annual tests must be no more than 13 months apart.</p> <p>If test results are at or below 75 percent of the limit for at least 2 consecutive years and there are no changes in the operation of the boiler or control equipment that could increase emissions, the Permittee may choose to conduct performance test every third year. The test must be conducted no later the 37 months after the previous performance test. The annual testing frequency must resume if a performance test exceeds 75 percent of the emission limit.</p> <p>The site-specific test plan must be submitted in accordance to §63.7(c), 60 days before the scheduled test date. Test results must be submitted within 60 days after the completion of</p>	<p>40 CFR 63.7500(a), 40 CFR Part 63, Subpart DDDDD, Table 2 (Item 1b) for limits</p> <p>40 CFR Part 63, Subpart DDDDD Table 5 (Item 4), 40 CFR 63.7515 and 63.7520 for performance testing</p> <p>40 CFR 63.7(c) for test plan</p> <p>40 CFR 63.7575(f) test submittal</p>

Condition	Parameter	Limit (shall not exceed)/Other Requirements	Monitoring & Reporting	Applicable Requirements
			the performance test. Results must be submitted to EPA and Ecology via CEDRI.	
C.9a	HAPs, Mercury	Boiler Tune-Up, Work Practice Standards	The Permittee must conduct a tune-up of the boiler annually as specified in §63.7540(a)(10). The tune-up must be conducted while burning the type of fuel that provided the majority of heat input over the 12 months prior to the tune-up.	40 CFR Part 63, Subpart DDDDD, Table 3 (Item 3)
C.9b	HAPs, Mercury	Energy Assessment, Work Practice Standards	The Permittee must conduct a one-time energy assessment in accordance with a Table 3 (Item 4) of 40 CFR Part 63, Subpart DDDDD, no later than the compliance date specified in §63.7495.	40 CFR Part 63, Subpart DDDDD, Table 3 (Item 4)
C.9c	HAPs, Mercury	Startup Work Practices	<p>During the boiler startup, the Permittee must do all of the following:</p> <ul style="list-style-type: none"> <li>• Operate all CMS</li> <li>• Use one or a combination of clean fuels defined in 40 CFR Part 63, Subpart DDDDD, Table 3 (Item 5b).</li> <li>• Vent emissions to the main stack and engage all applicable control devices, once the Permittee starts to feed non-clean fuel</li> </ul> <p>Clean dry biomass with 20% or less moisture is considered clean fuel. In the monthly air report, Cosmo must include the date and time where hogged fuel used during startup did not meet the</p>	<p>40 CFR Part 63, Subpart DDDDD, Table 3 (Item 5)</p> <p>40 CFR 63.7535 and 40 CFR Part 63, Subpart DDDDD, Table 3 (Item 5d) for monitoring</p> <p>40 CFR 63.7555(d)(9) and (10) for recordkeeping</p> <p>40 CFR 63.7550 for reporting</p>

Condition	Parameter	Limit (shall not exceed)/Other Requirements	Monitoring & Reporting	Applicable Requirements
			<p>definition of clean dry biomass and what corrective actions were taken to ensure that the boiler continues to meet the clean fuel requirement of this condition and the good air pollution control practices in Facility-Wide condition #12.</p> <p>Monitoring data must be collected during periods of startup, as specified by §63.7535(b).</p> <p>The Permittee must keep records during startup periods and maintain records of the calendar, date, time, occurrence, and duration of each startup and the type(s) and amount(s) of fuel used during each startup.</p> <p>Report activities and periods of startup as specified in §63.7550.</p> <p>For the purpose of Boiler MACT compliance, startup is defined as the firing of fuel after a shutdown event for any purpose. Startup ends when any of the useful thermal energy (steam or heat) is supplied for any purpose.</p> <p>If the Permittee chooses to use fuel analysis from the fuel supplier to comply with the clean fuel requirements, the Permittee must maintain records demonstrating that the fuel supplier use</p>	

Condition	Parameter	Limit (shall not exceed)/Other Requirements	Monitoring & Reporting	Applicable Requirements
			the analytical method in 40 CFR Part 63, Subpart DDDDD, Table 6.	
C.9d	HAPs, Mercury	Shut Down Work Practices	<p>During the boiler shutdown, the Permittee must do all of the following:</p> <ul style="list-style-type: none"> <li>• Operate all CMS.</li> <li>• Vent emissions to the main stack and engage all applicable control devices when firing fuels that are not clean fuels defined in 40 CFR Part 63, Subpart DDDDD, Table 3 (Item 5b).</li> </ul> <p>The Permittee has the option to burn another fuel to support the shutdown process, in addition to the fuel used prior to initiation of the shutdown. The additional fuel must be one or a combination of clean fuels listed in 40 CFR Part 63, Subpart DDDDD, Table 3 (Item 6).</p> <p>Monitoring data must be collected during periods of shutdown, as specified by §63.7535(b).</p> <p>The Permittee must keep records during shutdown periods and maintain records of the calendar, date, time, occurrence, and duration of each startup and the type(s) and amount(s) of fuel used during each startup.</p>	<p>40 CFR Part 63, Subpart DDDDD, Table 3 (Item 6)</p> <p>40 CFR 63.7535 and 40 CFR Subpart DDDDD, Table 3 (Item 6) for monitoring</p> <p>40 CFR 63.7555(c)(9) and (10) for record keeping</p> <p>40 CFR 63.7550 for reporting</p>



Condition	Parameter	Limit (shall not exceed)/Other Requirements	Monitoring & Reporting	Applicable Requirements
			<p>Report activities and periods of startup as specified in §63.7550.</p> <p>For the purpose of Boiler MACT compliance, shutdown means the period in which cessation of operation of a boiler is initiated for any purpose. Shutdown begins when the boiler no longer supplies useful thermal energy for heating, cooling, or process purpose/or generates electricity or when no fuel is being fed to the boiler, whichever is earlier. Shutdown ends when the boiler no longer supplies useful thermal energy for heating, cooling, or process purpose and/or generates electricity, and no fuel is being combusted.</p>	
C.10a	HAPs, Mercury	Scrubber flow rate, 30-day rolling average $\geq$ lowest one-hour average scrubber flow rate measured during performance test	<p>The Permittee must collect scrubber flow rate data in accordance with §§63.7525 and 63.7535.</p> <p>The Permittee must establish a minimum flow rate as the operating limit during the three-run performance test. The Permittee must collect scrubber flow rate data every 15 minute during the performance test and compute the lowest one-hour average flow rate using all of the 15-minute readings.</p> <p>If multiple performance tests were conducted, set the minimum liquid flow rate operating limit at</p>	<p>40 CFR Part 63, Subpart DDDDD, 63.7500(a)(2), Table 4 (Item 1), Table 7 (Item 1a), and Table 8 (Item 4).</p> <p>40 CFR 63.7530(b)(4)(iii) for operating limits</p> <p>40 CFR 63.7540(a) for performance test</p>

Condition	Parameter	Limit (shall not exceed)/Other Requirements	Monitoring & Reporting	Applicable Requirements
			<p>the higher of minimum values established during performance tests.</p> <p>Operating limit must be confirmed or re-established during performance tests. Scrubber flow rate during performance tests is not subject to this operating limit.</p>	
C10.b	HAPs, Mercury	Scrubber $\Delta P$ , 30-day rolling average $\geq$ lowest one-hour average scrubber $\Delta P$ measured during performance test.	<p>The Permittee must collect scrubber <math>\Delta P</math> data in accordance with §§63.7525 and 63.7535.</p> <p>The Permittee must establish a minimum pressure drop (<math>\Delta P</math>) as the operating limit during the three-run performance test. The Permittee must collect scrubber <math>\Delta P</math> data every 15 minutes during the performance test and compute the lowest one-hour average <math>\Delta P</math> using all of the 15-minute readings.</p> <p>If multiple performance tests were conducted, set the minimum <math>\Delta P</math> operating limit at the higher of minimum values established during performance tests.</p> <p>Operating limits must be confirmed or reestablished during performance tests. Scrubber <math>\Delta P</math> during performance tests is not subject to this operating limit.</p>	<p>40 CFR Part 63, Subpart DDDDD, 43.7500(a)(2), Table 4 (Item 1), Table 7 (Item 1a), and Table 8 (Item 4)</p> <p>40 CFR 63.7530(b)(4)(iii) for operating limits</p> <p>40 CFR 43.7540(a) for performance test</p>

Condition	Parameter	Limit (shall not exceed)/Other Requirements	Monitoring & Reporting	Applicable Requirements
C.11	HAPs, Mercury	Operating load or steam generation, 30-day ave $\leq$ 110% of highest hourly average operating load during the performance test	<p>The Permittee shall collect operating load or steam generation data every 15 minutes during performance test and compute the average operating load using all of the 15-min readings. The highest hourly average of the three test run averages multiplied by 1.1 is the operating limit.</p> <p>The Permittee must comply with the operating limit for operating load following each performance test until the next performance test.</p> <p>Operating limits must be confirmed or reestablished during performance tests. Operating load during performance tests is not subject to this operating limit.</p>	<p>40 CFR Part 63, Subpart DDDDD, 63.7520(c) Table 4 (Item 7) and Table 7 (Item 5)</p> <p>40 CFR 63.7520(c)</p> <p>40 CFR Part 63, Subpart DDDDD, Table 8 (Item 10) for continuous compliance</p> <p>40 CFR 43.7540(a) for performance test</p>
C.12	HAPs, Mercury	Oxygen level, 30-day rolling ave $\leq$ lowest hourly average oxygen level measured during the CO performance test in condition C.6	The Permittee must install, operate, and maintain an oxygen analyzer system as defined in §63.7575. Oxygen level must be continuously monitored and used to calculate the 30-day rolling average.	40 CFR 63.7525(a) and 40 CFR Part 63, Subpart DDDDD, Table 8 (Item 9)
C.13a	HAPs, Mercury	Fuel analysis for chloride and mercury	The Permittee shall conduct fuel analysis for chloride and mercury for each type of fuel burned. Fuel sample collection and analysis must follow the applicable methods in §63.7521(c) and	40 CFR Part 63, Subpart DDDDD, Table 6 and 40 CFR 63.7521

Condition	Parameter	Limit (shall not exceed)/Other Requirements	Monitoring & Reporting	Applicable Requirements
			<p>(d) and 40 CFR Part 63, Subpart DDDDD, Table 6.</p> <p>Fuel analysis is not required for fuels used only for startup, shutdown, or transient flame stability purpose.</p> <p>The Permittee must use the fuel analysis to establish the maximum fuel input for chlorine and mercury, in accordance with §63.7530(b). The Permittee must maintain a copy of all calculations and supporting documents.</p> <p>Fuel analysis associated with a performance test must be submitted within 60 days after the completion of the performance test.</p>	<p>40 CFR 63.7530 for maximum fuel input</p> <p>40 CFR 63.7515(f)</p>
C.13b	HAPs, Mercury	Fuel Monitoring Plan	The Permittee shall develop a site-specific fuel monitoring plan in accordance with §63.7521(b).	40 CFR 63.7521
C13.c	HAPs	Fuel Records	<p>The Permittee must keep records of the type and amount of all fuel burned during reporting period, in accordance §63.7555(d).</p> <p>The Permittee must keep a copy of all calculations and supporting documentation of maximum chlorine and mercury fuel input to demonstrate compliance with the chlorine and mercury emission limits.</p>	40 CFR 63.7540(2) and 63.7555

Condition	Parameter	Limit (shall not exceed)/Other Requirements	Monitoring & Reporting	Applicable Requirements
C.13d	HAPs	Chlorine fuel input $\leq$ maximum chlorine fuel input during last performance test (for new fuels)	<p>If the Permittee plans to burn a new fuel, the maximum chlorine fuel input must be recalculated in accordance with §63.7530.</p> <p>If the chlorine input is greater than the maximum input during the previous performance test, the Permittee must conduct a new performance test within 60 days of burning the new fuel. The site-specific test plan must be submitted in accordance to §63.7(c) 60 days before the scheduled test date. Test results must be submitted within 60 days after the completion of the performance test. New operating limits must be established based on this new performance test.</p> <p>New fuel described in §63.7510(a)(2)(i) and (iii) is not subject to this requirement.</p>	<p>40 CFR 63.7540(2) and (4)</p> <p>40 CFR 63.7(c) for test plan</p> <p>40 CFR 63.7575(f) test submittal</p>
C13.e	Mercury	Mercury fuel input $\leq$ maximum mercury fuel input during last performance test (for new fuels)	<p>If the Permittee plan to burn a new fuel, the maximum mercury fuel input must be recalculated in accordance with §63.7530. If the mercury input is greater than the maximum input during the previous performance test, the Permittee must conduct a new performance test within 60 days of burning the new fuel.</p> <p>If the mercury input is greater than the maximum input during the previous performance test, the Permittee must conduct a new performance test</p>	<p>40 CFR 43.7540(2) and (6)</p> <p>40 CFR 63.7(c) for test plan</p> <p>40 CFR 63.7575(f) test submittal</p>

Condition	Parameter	Limit (shall not exceed)/Other Requirements	Monitoring & Reporting	Applicable Requirements
			<p>within 60 days of burning the new fuel. The site-specific test plan must be submitted in accordance to §63.7(c) 60 days before the scheduled test date. Test results must be submitted within 60 days after the completion of the performance test. New operating limits must be established based on this new performance test.</p> <p>New fuel described in §63.7510(a)(2)(i) and (iii) is not subject to this requirement.</p>	
C.14	HAPs, Mercury	Compliance Report	<p>The Permittee shall submit semiannually a report covering the reporting periods from January 1 through June 30 and from July 1 through December 31. The report must be postmarked or submitted no later than July 31 for the first calendar half and January 31 for the second calendar half. The report must contain information required in §63.7550.</p> <p>The compliance report must be submitted to EPA via CEDRI and to Ecology.</p>	40 CFR 63.7550 and 40 CFR Part 63, Subpart DDDDD, Table 9

**D. Oxygen Blow Tank Vent (BP-6)**

Condition	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
D.1	Volatile organic compounds (VOCs)	34 tons VOC, as carbon, per year	<p>The Permittee shall perform at least annually, EPA Method 25A Modified, to confirm the emission factor of VOCs, as carbon, per ton of production. EPA Method 25A Modified is the NCASI methanol (VOC) method.</p> <p>The Permittee shall report the results of the EPA Method 25A Modified source test within 60 days after the completion of the source test.</p> <p>The calculated VOC emissions rate and the yearly pulp production rate must reported with the December monthly air emissions report that is due January 15th.</p> <p>Annual emissions and emission factors shall be calculated using the algorithms in Appendix C.</p>	Order No. 94AQ-I018, Condition 1 issued per WAC 173-400-113

D.2 Operational Parameter:

The Permittee shall monitor the amount of air-dried unbleached pulp produced in tons per day and report the average daily production for the reporting month in the monthly air emissions report. The daily production of pulp shall be used as a minimum operational parameter for VOC emissions. [WAC 173-410-062(2)(b), Order No. 94AQ-I018, Condition 2 issued per WAC 173-400-113]

**E. Nuisance Tower (DB-26)**

Condition	Parameter	Limit (shall not exceed)/Operating Parameter	Monitoring & Reporting	Applicable Requirements
E.1	Sulfur dioxide	0.2 lbs/min, on a 15-minute average, per ADUT from one digester dump	<p><i>Reference Test Method:</i>                      The Permittee shall monitor sulfur dioxide with a EPA Reference Method 6 modified source test once per month. “Modified” means that the source test is time-adjusted for the average duration of one digester dump, which is 15 minutes. The Modified EPA Method 6 results, divided by the corresponding digester pulp production, determines the sulfur dioxide emissions per ADUT. The result shall be submitted within 60 days after the completion of the performance test.</p> <p>The total tons of pulp shall be based on the tons of unbleached pulp per digester dump. The production of pulp during the digester dump shall be measured, recorded, and reported to Ecology in the respective monthly air emissions report.</p> <p><i>Compliance Assurance Monitoring:</i>                      The Permittee shall comply with the general CAM requirements in Condition E.2. The Permittee must comply with the monitoring and corrective action requirements in Condition E.2.</p> <p>CAM reporting required on at a minimum semiannual basis.</p>	<p>WAC 173-410-040(1)(c)</p> <p>40 CFR 64.2 and 64.6 through 64.9 for respective sulfur dioxide CAM monitoring and reporting/recordkeeping</p>



Condition	Parameter	Limit (shall not exceed)/Operating Parameter	Monitoring & Reporting	Applicable Requirements
E.2	Sulfur dioxide	Scrubber flow must be $\geq 150$ gpm on a fifteen-minute average	<p>The Permittee shall continuously monitor and record scrubber flow to the Nuisance Tower scrubber.</p> <p>When the scrubber flow does not meet the minimum operating condition above, the Permittee shall take corrective action within the shortest practical time, or as soon as arrangements can be made, but not longer than one hour. The Permittee may perform the applicable EPA Method 6.</p> <p>The Permittee shall report all instances where the facility operates without meeting the minimum operating requirement, and report the corrective action taken, on the facility's respective monthly air emissions report.</p> <p>Failure to take corrective actions violates WAC 173-410-040(4) and is a violation of the underlying requirement, unless compliance can be demonstrated using the applicable reference method.</p>	WAC 173-410-040(4), WAC 173-401-615(4)

**F. Mill-wide Emissions (All emissions from mill except emissions associated with the Power Boiler)**

Condition	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
F.1	Sulfur dioxide	20 lbs/ day/ADUT	<i>Monitoring:</i>	WAC 173-410-040(1)(a)

Condition	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
			<p>Mill wide emissions includes the following units.</p> <p>Each of the following unit's/source's SO<sub>2</sub> emissions must be measured or estimated on a monthly basis, totaled, counted toward the to demonstrate compliance with the limit.</p> <p>Emissions may be estimated using process knowledge and/or emission factors. Any additional emission units/sources with an estimated output of more than one ton SO<sub>2</sub> per year must be included in the total.</p> <ul style="list-style-type: none"> <li>(a) SARA Title 304 releases</li> <li>(b) Recovery Boilers Common Stack (AP-10)</li> <li>(c) Nuisance Tower vent (DB-26)</li> <li>(d) Brown Stock Washers (BSW) Vents No. 1, 2, and 3, and BSW and Deknotter Vent No. 4 (BS-7 and BS-6, respectively)</li> <li>(e) No. 4 Filtrate Tank vent (BS-4) (IEU)</li> <li>(f) North and South Weak Red Liquor Tank vents (IEUs)</li> <li>(g) Condensate Day Tank vent and stand pipe (IEU)</li> <li>(h) CE and ME Hogging Jet vents (IEU)</li> <li>(i) Heavy Liquor Vent Tanks No. 1, 2, and 3 (IEUs)</li> <li>(j) Condensate Tank overflow sump (IEU)</li> </ul>	<p>Order No. DE 95AQ-I034 (Attachment B)</p>

Condition	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
			<p>When measured, pounds of SO<sub>2</sub> emitted shall be measured as the daily average. The flow used in these calculations shall be the flow rate measured during stack testing each month, using DOE Method 2, or other method approved by Ecology. The moisture content shall not exceed the saturation value measured at the stack temperature.</p> <p>The production rate shall be reported as the monthly average for each month. The Permittee must measure average daily production as required by Condition D.2 above.</p> <p><i>Reporting:</i> The Permittee shall calculate the daily average mill-wide sulfur dioxide emissions from the units and sources listed above using the algorithm defined in Appendix C of this permit. The Permittee shall record and submit the daily calculated averages in the monthly air emissions report.</p>	

### G. Sulfite Pulping Group (MACT I)

Condition	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
G.1	Methanol	1.1 kg methanol per megagram (2.2 lbs/ton) ODP	The Permittee shall perform EPA Method 308 as defined in Appendix A of 40 CFR Part 63. Testing shall be performed on emissions listed in 40 CFR 63.444(c). Method 1 or 1A shall be used to determine the sampling site. Method 2, 2A, 2C, or 2D of 40 CFR Part 60 Appendix A shall be used to determine the flow rate and	WAC 173-400-075(6)  40 CFR 63.444(c)(1),

Condition	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
			<p>Method 4 (40 CFR Part 60 Appendix A) to determine the moisture content.</p> <p>The Permittee shall conduct the performance test every five years with three individual runs, each lasting 60 minutes minimum. Test results must be submitted within 60 days after the completion of the performance test. Results must be submitted to EPA and Ecology via CEDRI.</p>	<p>40 CFR 63.444(c)(2)(i)</p> <p>40 CFR 63.455 for CEDRI reporting</p>

G.2a Inspection:

The Permittee must visually inspect the closure mechanism for each enclosure opening at least once every 30 days to ensure the opening is maintained in the closed position and sealed.

Enclosure is defined in 40 CFR 63.450(b) as enclosures for the equipment listed in 40 CFR 63.444(a). This includes each digester vent and each pulp washing system. [WAC 173-400-075(6), 40 CFR 63.453(k)(1)]

G.2b Inspection:

The Permittee must visually inspect the closed-vent systems for equipment listed in 40 CFR §43.450(a). The inspection must include ductwork, piping, enclosures, and connections to covers for visible evidence of defects. The inspection must be conducted every 30 days and at other times requested by Ecology. [WAC 173-400-075(6), 40 CFR 63.453(k) (2)]

G.2c Inspection:

The Permittee must demonstrate initially and annually that each enclosure opening is maintained at negative pressure using one of procedures specified in 40 CFR 63.457(e). Enclosure is defined in 40 CFR 63.450(b) as enclosures for the equipment listed in 40 CFR §63.444(a). [WAC 173-400-075(6), 40 CFR 63.453(k) (4)]

G.2d Inspection:

The Permittee must inspect each bypass line valve as defined in 40 CFR §63.450(d)(2). Inspection must be conducted at least once every 30 days to ensure that the valve is maintained in a closed position and the emission point gas stream is not diverted to the bypass line. [WAC 173-400-075(6), 40 CFR 63.453(k) (5)]

G.2e Corrective Action:

The Permittee must take corrective action if any of the inspections from G.2a through G.2d identifies a visible defect in ductwork, piping, enclosures, or connections to covers or if enclosure openings are not maintained at negative pressure.

The Permittee must make a first effort to repair or correct the closed vent system as soon as practicable but no later than 5 calendar days after the problem is identified.

The Permittee must complete the repair or correction no later than 15 calendar days after the problem is identified. Delay of repair or corrective action is allowed if the repair or corrective action is technically infeasible without a process unit shutdown or if the owner or operator determines that the emissions resulting from immediate repair would be greater than the emissions likely to result from delay of repair. Repair of such equipment shall be completed by the end of the next process unit shutdown. [WAC 173-400-075(6), 40 CFR 63.453(k)(6)]

G.3a Recordkeeping:

The Permittee shall comply with the recordkeeping requirements in 40 CFR 63.10 and 40 CFR 63.454(b). Recordkeeping requirements in Conditions A.4a and E.2 shall fulfill the CMS monitoring and recordkeeping requirements for the pulping part of MACT I. [WAC 173-400-075(6), 40 CFR 63.454(a)]

G.3b Recordkeeping:

For each applicable enclosure opening, closed vent system, and closed collection system, the Permittee must prepare and maintain a site-specific inspection plan including a drawing or schematic of the components of applicable affected equipment. The Permittee must record the following information for each inspection:

- a. Date of inspection;
- b. The equipment type and identification;
- c. Results of negative pressure tests for enclosures;
- d. Results of leak detection tests;
- e. The nature of any defect or leak and the method of detection;
- f. The date any defect or leak was detected and the date of each attempt to repair the defect or leak;
- g. Repair methods applied in each attempt to repair the defect or leak;
- h. The reason for the delay if the defect or leak was not repaired within 15 days;
- i. The expected date of successful repair of the defect or leak if the repair was not completed within 15 days;
- j. The date of successful repair of the defect or leak;
- k. The position and duration of opening of bypass line valves, and the condition of any valve seals; and
- l. The duration of manual or computer-controlled by-pass valves use.

[WAC 173-400-075(6), 40 CFR 63.454(b)]

G.4 Reporting:

The Permittee shall comply with the reporting requirements in 40 CFR Part 63, Subpart A, and all of the requirements in 40 CFR 63.455. [WAC 173-400-075(6), 40 CFR 63.455]

## **H. General (MACT I), Emission Units in Pulp and Paper Production Areas**

### **H.1a Operation:**

The Permittee shall operate and maintain the emission unit subject to the MACT standard, and its associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions. [WAC 173-400-075(6), 40 CFR 63.453(q)]

### **H.1b Reserved**

### **H.2a Reserved**

### **H.2b Reserved**

### **H.3a Recordkeeping:**

The Permittee shall maintain relevant records in accordance with 40 CFR 63.10(b)(2)(iii) and (vi) through (xiv). [WAC 173-400-075(6) and 63.10(b)(2)].

### **H.3b Recordkeeping:**

The Permittee shall maintain files of all information (including all reports and notifications) in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. [WAC 173-400-075(6), 40 CFR 63.10(b)(1)]

### **H.4 Reporting:**

If a malfunction occurred during the reporting period, the report must include the number, duration and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.453(q), including actions taken to correct a malfunction. The report shall be delivered or postmarked by the 15<sup>th</sup> day following the end of the each reporting month. [WAC 173-400-075(6) and 40 CFR 43.455(g)]

### **H.5 General Provisions:**

The Permittee shall comply with applicable requirements prescribed in 40 CFR Part 63, Subpart A, Sections 63.6, 63.7, 63.8, 63.9, and 63.10. [WAC 173-400-075(6), 40 CFR 63.440(g)]

## **I. Greenhouse Gas Requirements**

I.1 The Permittee shall comply with reporting requirements in 40 CFR Part 98. [40 CFR Part 98]

The following **state-only** requirements, I.2 through I.3, are not federally enforceable under the Federal Clean Air Act:

I.2a Reporting:

The Permittee shall submit the report required under WAC 173-441 no later than March 31 of each calendar year for GHG emissions in the previous calendar year. [WAC 173-441-050]

I.2b Reporting:

The Permittee shall submit the report and certificate of representation electronically in accordance with WAC 173-441-050 and 173-441-060 and in the format specified by Ecology. [WAC 173-441-070]

I.2c Reporting:

Each annual GHG report shall contain the content specified in WAC 173-441-050(3). Each annual GHG report and any submission under WAC 173-441 shall be certified, signed, and submitted by the designated representative or any alternative designated representative in accordance with WAC 173-441-060 and 40 CFR 3.10, as adopted on October 13, 2005.

Each submission shall include the following certification statement signed by the designated representative or alternative designated representative: "I am authorized to make this submission on behalf of the owners and operators of the facility or suppliers, as applicable, for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information including the possibility of fine or imprisonment." [WAC 173-441-050 and 173-441-060]

I.3 Notification:

All requests, notification, and communications to Ecology pursuant to WAC 173-441, other than the submittal of the annual report, shall be submitted to: Greenhouse Gas Report, Air Quality Program, Department of Ecology, PO Box 47600, Olympia, WA 98504-7600. [WAC 173-441-100]



## FACILITY-WIDE GENERAL REQUIREMENTS

### [WAC 173-401-600]

These generally applicable requirements apply facility-wide, including insignificant emission units or activities. Insignificant emission units or activities, however, are not subject to monitoring, testing, recordkeeping, reporting, or compliance certification requirements.

1. Varying Emission Rate - The Permittee cannot vary the rate of emission of a pollutant according to atmospheric conditions or ambient concentrations of that pollutant, except as directed according to air pollution episode regulations. [WAC 173-400-205]
2. Detrimental Emissions - The Permittee shall not cause or allow the emission of any air contaminant if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business. [WAC 173-400-040(6)]
3. Concealment and Masking - The Permittee shall not cause or allow the installation or use of any means that conceal or mask an emission of an air contaminant which would otherwise violate provisions in this permit. [WAC 173-400-040(8)]
4. Fugitive Emissions - The Permittee shall take reasonable precautions to prevent the release of air contaminants from emission units engaged in material handling, construction, demolition, or any other operation that is a source of fugitive emissions. Reasonable precautions include, but are not limited to, application of water to paved areas and debris piles as necessary to control fugitive dust or the timely removal or coverage of material piles. [WAC 173-400-040(4)(a)]
5. Fugitive Dust - The Permittee shall take reasonable precautions to prevent fugitive dust from becoming airborne and maintain and operate the source to minimize emissions. Reasonable precautions include, but are not limited to, application of water to paved areas and debris piles as necessary to control fugitive dust or the timely removal or coverage of material piles. [WAC 173-400-040(9)(a)]
6. Particulate Matter Deposition (Fallout) - **The following condition is state-only and is not federally enforceable under the Clean Air Act:** The Permittee shall not cause or allow the emission of particulate matter from any sources to be deposited beyond the property under direct control of the Permittee in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited. [WAC 173-400-040(3)]
7. Odors - **The following condition is state-only and is not federally enforceable under the Clean Air Act:** Any person causing odor which may unreasonably interfere with the property owner's use and enjoyment of his property must use recognized good practice and procedures to reduce odors to a reasonable minimum. [WAC 173-400-040(5)]

8. Opacity - Except as otherwise allowed in this permit, the Permittee may not cause or allow the emission of a plume from any emission unit which has an average opacity greater than 20% for more than 3 consecutive minutes in any 60 minute period, except as provided in WAC 173-400-040(2)(a) through (e). [WAC 173-400-040(2)]
9. Complaints - Except where specific requirements are defined elsewhere, the Permittee shall assure compliance with Conditions 1 through 8 by recordkeeping of actions taken by the Permittee in response to complaints received by the Permittee or of possible noncompliance noticed by the facility staff in day to day operations. The Permittee shall assess the validity of each complaint and commence corrective action, if warranted, as soon as possible but no later than 3 working days of receiving the complaint. The Permittee shall keep records of the following: complaints received; the assessment of validity; and what, if any, corrective action was taken in response to the complaint. [WAC 173-401-630]
10. Sulfur Dioxide Emissions - Emissions from any unit, other than a recovery system, a blow system or acid plant, shall not exceed 1000 ppm of sulfur dioxide, corrected to seven percent oxygen in the case of combustion unit, for any hourly average. [WAC 173-410-040(1)(f)]
11. Comply with Applicable Requirements - The Permittee shall submit, with the permit application form, a compliance schedule with a statement that:
  - A. The Permittee will continue to comply with applicable requirements with which the Permittee is in compliance. [WAC 173-401-630(3) and 510(2)(h)(iii)(A)]
  - B. The Permittee will meet applicable requirements that become effective during the permit term on a timely basis. [WAC 173-401-630(3) and 510(2)(h)(iii)(B)]
12. Good Air Pollution Control Practice - The Permittee shall at all times, including periods of abnormal operation and upset conditions, to the extent practicable, maintain and operate any affected facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practice.

As part of good air pollution control practices, the Permittee shall, to the extent practicable, burn dry hogged fuel at the Hogged Fuel Boiler (HFB). The Permittee must include in the monthly air report: 1) the moisture content of the hogged burned during the HFB startup, when applicable; 2) measurements of the moisture content taken during the month; 3) the corrective actions and/or measures taken to ensure the hogged fuel moisture content is minimized.

Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to Ecology which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [40 CFR 60.11(d), 40 CFR 63.6(e)(1), WAC 173-410-040(4)]

13. Chemical Accidental Release Program - This stationary source, as defined in 40 CFR 68.3, may be subject to Part 68, the accidental release prevention regulations. If required, this stationary source shall submit a risk management plan (RMP) by the date specified in section 68.10. If required, this stationary source shall certify compliance with the requirements of Part 68 as part of the annual compliance certification per 40 CFR Part 70 or 71.
  
14. Stratospheric Ozone Protection -
  - A. The Permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditions (MVACs) in Subpart B:
    - i. Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to §82.156.
    - ii. Equipment used during the maintenance, service, repair or disposal must comply with the standards for recycling and recovery equipment pursuant to §82.158.
    - iii. Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technical certification program pursuant to §82.161.
    - iv. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166 (“MVAC-like appliance” is defined at §82.152.)
    - v. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
    - vi. Owners/operators of appliances normally containing 50 or more pounds of refrigerant purchased and added to such appliances must comply with requirements pursuant to §82.166.
  - B. The Permittee may switch from any ozone-depleting substance to any alternative approved pursuant to the Significant New Alternatives Program (SANP), 40 CFR Part 82, Subpart G, without a permit revision but shall not switch to a substitute listed as unacceptable pursuant to such program. [40 CFR 82.174]
  - C. Any certified technician employed by Permittee shall keep a copy of their certification at their place of employment. [40 CFR 82.166(1)]
  - D. **The following condition is state-only and is not federally enforceable under the Clean Air Act:** The Permittee shall not willfully release any regulated refrigerant and shall use refrigerant extraction equipment to recover regulated refrigerants that would otherwise be released into the atmosphere. [RCW 70.94.970(2), 970(4)]

- E. Compliance with this term and condition will be demonstrated by using a certified contractor or employee. [40 CFR Part 82]
15. Insignificant Emission Units (IEUs) - The generally applicable requirements that apply to IEUs are: WAC 173-400-040, WAC 173-400-050(1) & (3), and WAC 173-400-060. [WAC 173-401-530(2)(b)]
16. Volatile Organic Liquid Storage Vessels - The Permittee shall keep records showing the dimensions and capacities of all storage vessels having capacities greater than or equal to 75 cubic meters that are used to store volatile organic liquids and for which construction, reconstruction, or modification commenced after July 23, 1984. These records are to be kept for the life of each storage vessel. [40 CFR 60.116b (a) and (b)]
17. Used Oil Burning - **The following condition is state-only and is not federally enforceable under the Clean Air Act.** The Permittee cannot burn used oil that does not meet the standards prescribed in RCW 70.94.610(1). [RCW 70.94.610]
18. Asbestos - The Permittee shall comply with the applicable requirements of 40 CFR Part 61, Subpart M (asbestos NESHAP) and WAC 173-400-100 when conducting any renovation or demolition at the facility. [40 CFR Part 61 and WAC 173-400-100]
19. Unavoidable Excess Emissions. This condition is applicable until WAC 173-400-109 becomes effective. This condition applies, where applicable, to excess emissions that are claimed to be unavoidable pursuant to WAC 173-400-107. The Permittee may include in its reports demonstrations that excess emissions were unavoidable, consistent with the requirements of WAC 173-400-107. The Permittee shall have the burden to prove that deviations from permit terms were unavoidable. Excess emissions that are unavoidable are excused and not subject to penalty. [WAC 173-400-107]
20. Unavoidable Excess Emissions. This condition is applicable upon the effective date of WAC 173-400-109. This condition applies, where applicable, to excess emissions that are claimed to be unavoidable pursuant to WAC 173-400-109. The Permittee may include in its reports demonstrations that excess emissions were unavoidable, consistent with the requirements of WAC 173-400-109. The Permittee shall have the burden to prove that deviations from permit terms were unavoidable. Excess emissions that are unavoidable are not subject to penalty. Claim of unavoidable excess emissions does not apply to exceedance of an emission standard in 40 CFR Parts 60, 61, 62, 63, and 72, or Ecology's adoption by reference of these standards. [WAC 173-400-109]
21. Unit-Specific Requirements - The Permittee shall conduct routine monitoring of emissions in accordance with the program of monitoring or testing required by specific emission unit conditions of this permit. Monitoring is required during periods when the unit is in operation. In operation means engaged in activity related to the primary design function of the source. [WAC 173-410-062]
22. Reserved

23. Violation Duration - A violation of an emission limit is presumed to commence at the time of the testing, recordkeeping or monitoring indicating noncompliance, and to continue until the time of retesting, recordkeeping or monitoring that indicates compliance. This presumption may be defeated if credible evidence shows that the violation was of longer duration, that there were intervening days during which no violation occurred or that the violation was not continuing in nature. [42 U.S.C. 7413(e)(2)]. The Permittee may conduct monitoring or testing more frequently than required by this permit.
24. Insignificant Emission Units - The Permittee is not subject to any testing, monitoring, reporting, or recordkeeping for the insignificant emission units or activities listed. [WAC 173-401-530(2)(c)]
25. Reserved

**Recordkeeping Requirements [WAC 173-401-615]**

26. Monitoring Records - The Permittee shall keep records of any periodic and continuous monitoring required by this permit. These records shall include the following, where applicable:
  - a. The date, place as defined in requirement, and time of sampling or measurement;
  - b. The date(s) analysis was performed;
  - c. The company or entity that performed the analysis;
  - d. The analytical techniques or methods used;
  - e. The results of such analysis; and
  - f. The operating conditions existing at the time of sampling or measurement.[WAC 173-401-615(2)(a) and WAC 173-400-105]
27. Inspection Checklists - Where the Permittee is required to use and maintain an inspection checklist, the checklist must contain, at a minimum, the following information:
  - a. The name of the person conducting the inspection;
  - b. The date/time of the inspection;
  - c. Location of the inspection;
  - d. The observations made during the inspection;
  - e. Corrective actions taken if any; and
  - f. The date and time corrective action was initiated and completed.

[WAC 173-401-615(1)(b)]

28. Changes at Source - The Permittee shall keep records describing 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 173-401-724(5)]
29. Records Retention - The Permittee shall retain records of all required monitoring data and support information for a period of five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all data from continuous monitoring instrumentation, and copies of all reports required by this permit. [WAC 173-401-615(2)(c)]
30. Recording Permit Deviations - The Permittee shall maintain a contemporaneous record of any deviation from the requirements of this permit. [WAC 173-401-615(3)(b)]
31. CEMS Data Recovery - State and federal regulations recognize that monitoring data may be lost for legitimate reasons. The Permittee may be exempted from monitoring and reporting requirements during periods of monitoring system malfunctions, provided that the Permittee shows the malfunction was unavoidable and is being repaired as expeditiously as practicable. [40 CFR 60.13(e) and 40 CFR 63.8(c)(4)]

The CEMS required in Conditions A.3, A.5, and A.6 must meet the following CEMS performance specifications:

- a. The Permittee shall recover valid hourly monitoring data for at least 95 percent of the hours that the equipment (required to be monitored) is operated during each calendar month except for periods of monitoring system downtime, provided that the Permittee demonstrated that the downtime was not a result of inadequate design, operation, or maintenance, or any other reasonable preventable condition, and any necessary repairs to the monitoring system are conducted in a timely manner. The Permittee shall also recover valid hourly monitoring data for least 90 percent of the daily operating hours of the equipment required to be monitored.
- b. Monitoring data commencing on the clock hour and containing at least forty-five minutes of monitoring data must be reduced to one hour averages. All monitoring data will be included in these averages except for data collected during calibration drift tests and cylinder gas audits, and for data collected subsequent to a failed quality assurance test or audit. After a failed quality assurance test or audit, no valid data is collected until the monitoring system passes a quality assurance test or audit.
- c. Except for system breakdowns, repairs, calibration checks, and zero and span adjustments required under subsection (a) of this section, all continuous monitoring systems shall be in continuous operation.
- d. Continuous monitoring systems shall complete a minimum of one cycle of sampling, analyzing, and recording for each successive fifteen minute period.

- e. The Permittee shall retain all monitoring data averages for at least five years, including copies of all reports submitted to the permitting authority and records of all repairs, adjustments, and maintenance performed on the monitoring system.
- f. The Permittee shall submit a monthly report to Ecology within thirty days after the end of the month in which the data were recorded. The report required by this section may be combined with any excess emission report required by WAC 173-400-108. This report shall include:
  - i. The number of hours that the monitored emission unit operated each month and the number of valid hours of monitoring data that the monitoring system recovered each month;
  - ii. The date, time period, and cause of each failure to meet the data recovery requirements of (a) of this subsection and any actions taken to ensure adequate collection of such data;
  - iii. The date, time period, and cause of each failure to recover valid hourly monitoring data for at least 90 percent of the hours that the equipment (required to be monitored) was operated each day;
  - iv. The results of all cylinder gas audits conducted during the month; and
  - v. A certification of truth, accuracy, and completeness signed by an authorized representative of the owner or operator.

**Reporting Requirements [WAC 173-401-520, -615(3), & -710]**

- 32. Unit Specific Reporting Requirements - In addition to any emission unit specific reporting requirements identified below, emission unit specific reporting requirements are identified in specific emission unit conditions of this permit.
- 33. Production Reporting - Report within 15 days of the end of each month the average daily production of air-dried unbleached pulp. [WAC 173-410-062(2)]
- 34. Monthly Air Emissions Reports - Monitoring reports required by this permit must be submitted to Ecology within 15 days of the end of each calendar month. The reports must clearly identify all instances of deviations from permit requirements. [WAC 173-410-062, WAC 173-401-615(3)(a)]
- 35. Emission Inventory - The Permittee shall submit an inventory of emissions, as specified in WAC 173-410-071, from the source each year no later than 105 days after the end of the calendar year. The Permittee shall maintain records of information necessary to substantiate any reported emissions. [WAC 173-410-071 and WAC 173-400-105(1)]
- 36. Permit Deviations/Excess Emissions - The Permittee shall promptly submit a report of any deviations from permit conditions.

- a. For purposes of this permit, submitting a report “promptly” means the following: (1) if the deviation presents a potential threat to human health or safety, the report shall be made as soon as possible but no later than 12 hours after the discovery of the deviation; (2) for other deviations, “promptly” means that the deviations are identified in the respective monthly air emissions report.
- b. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. The Permittee may include in its reports demonstrations that excess emissions were unavoidable, consistent with the requirements of WAC 173-400-107, 108, and 109. [WAC 173-401-615(3)(b) and WAC 173-400-107,108, and 109]

37. Certifications - Any application form, report, or compliance certification submitted pursuant to Chapter 173-401 WAC shall contain certification by a responsible official of truth, accuracy, and completeness.

This certification and any other certification required under Chapter 173-401 WAC shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. [WAC 173-401-520]

38. Report Address - All reports, renewal applications, and compliance certifications required by this permit shall be submitted to:

Department of Ecology  
Industrial Section  
PO Box 47600  
Olympia, WA 98504-7600

Compliance certification shall also be submitted to:

Environmental Protection Agency  
Air Operating Permits, Region 10  
1200 Sixth Avenue, OAQ-108  
Seattle, WA 98101-1128

39. Compliance Requirements/Certification -

- a. The Permittee shall continue to comply with applicable requirements with which the Permittee is in compliance;
- b. The Permittee shall meet applicable requirements that will become effective during the permit period on a timely basis;
- c. The Permittee shall submit a report to the Department of Ecology and to Region 10 of EPA each year of the terms of this permit by April 15 following the year of operation that the Permittee is certifying compliance with the terms and conditions contained in this permit. The certification shall describe the following:



- i. the permit term or condition that is the basis of the certification;
  - ii. the compliance status;
  - iii. whether compliance was continuous or intermittent; and
  - iv. the methods used for determining compliance, currently and over the reporting period consistent with required monitoring.
- d. Where a 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 a permit requires testing, monitoring, recordkeeping, and reporting for IEUs or activities, the Permittee may certify continuous compliance when testing, monitoring, and recordkeeping required by the permit indicates no violations during the period and there were no observed, documented, or known instances of noncompliance during the reporting period. [WAC 173-401-530(2)(d), WAC 173-401-510(2)(h)(iii), and WAC 173-401-630 (5)]

For the purpose of annually certifying compliance, the Permittee is considered to be in intermittent compliance with a permit term or condition if it is not in continuous compliance with the permit term or condition during the annual certification period.

40. Source Testing Results. Results of source testing (including source test reports) must be submitted to Ecology within 60 days of completion of each source test. [WAC 173-410-062]

Source test reports must be submitted to Ecology electronically via EPA's Compliance and Emissions Data Reporting Interface (CEDRI). EPA's Electronic Reporting Tool (ERT) may be used for reporting source testing results in CEDRI. Alternate submittal format may be used upon Ecology approval.

### **STANDARD TERMS & CONDITIONS**

41. Duty to Comply - The Permittee must comply with all conditions of this chapter 401 permit. Any permit noncompliance constitutes a violation of chapter 70.94 RCW and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [WAC 173-401-620(2)(a)]
42. Need to Halt or Reduce Activity Not a Defense - It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [WAC 173-401-620(2)(b)]

43. 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)]
44. Property Rights - This permit does not convey any property rights of any sort, or any exclusive privilege. [WAC 173-401-620(2)(d)]
45. Duty to Provide Information - The Permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the EPA administrator along with a claim of confidentiality. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70.94.205. [WAC 173-401-620(2)(e)]
46. Permit Fees - The Permittee shall pay fees as a condition of this permit in accordance with Ecology'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)]
47. 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)]
48. Severability Clause - 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)]
49. Permit Appeals - The Permittee may appeal this permit or any conditions in it only by filing an appeal with the pollution control hearings board and serving it on the permitting authority within thirty days of receipt pursuant to RCW 43.21B.310. This provision for appeal in this section is separate from and additional to any federal rights to petition and review under § 505(b) of the FCAA. [WAC 173-401-620(2)(i)]
50. Permit Continuation - This permit and all terms and conditions contained therein, including any permit shield provided under WAC 173-401-640, shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. 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)]
51. Application and Issuance of a Renewal Permit - The Permittee shall submit a complete permit renewal application to Ecology no later than six months, but no earlier than 18 months, prior to the expiration date of the existing permit.

Permits being renewed are subject to the same procedural requirements, including those for public participation, affected state and EPA review that apply to the initial permit. [WAC 173-401-710(1) & (2)]

52. Inspection and Entry - The Permittee shall allow the permitting authority or an authorized representative to perform the following upon presentation of credentials and other documents as may be required by law:
  - 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 the permit;
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
  - d. As authorized by 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 applicable requirements. [WAC 173 401-630(2)]
53. Federally Enforceable Requirements - All terms and conditions of this permit, including any provisions designed to limit potential to emit, are enforceable by EPA and citizens under the FCAA, unless they are specifically designated as not federally enforceable. [WAC 173-401-625]
54. Reopening for Cause - This permit shall be reopened and revised under any of the following circumstances:
  - a. Additional applicable requirements become applicable when the remaining permit term is greater than three years. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j).
  - b. Additional requirements (including excess emissions requirements) become applicable under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated in the permit.
  - c. Ecology determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or

- d. Ecology determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

Procedures to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. [WAC 173-401-730]

55. Tampering and False Statements - No person shall make any false material statement, representation or certification in any form, notice or report required in this permit. No person shall render inaccurate any monitoring device or method required under this permit. [WAC 173-400-105(7) and (8) and 40 CFR 70.11(a)]
56. Providing Additional Data - For Ecology to evaluate a plant's emissions or emission control program, the Permittee shall furnish other data requested by Ecology. [WAC 173-410-062(3)]

## **PERMIT SHIELD/ INAPPLICABLE REQUIREMENTS**

Pursuant to WAC 173-401-640(1), compliance with the terms and conditions of this permit shall be deemed compliance with the applicable requirements identified in this permit, as of the date of permit issuance. This permit shield does not exempt the Permittee from requirements determined to be applicable and enacted after the permit issuance date. This permit shield shall not apply to any insignificant emission unit or activity designated under WAC 173-401-530.

[WAC 173-401-530(3) and WAC 173-401-640(1)]

Pursuant to WAC 173-401-640(2), the Department of Ecology has determined that the requirements listed in Permit **Appendix A** do not apply to the facility, as of the date of permit issuance, for the reasons specified.

## APPENDIX A: Inapplicable Requirements

All inapplicable requirements have not been included in the table below. The requirements that are obviously inapplicable to the pulp mill have been excluded from the table below. The following requirements do not apply to the facility:

Citation	Title or Applicability	Reason(s) for Inapplicability
WAC 173-400-040(2)(c)	20 percent opacity for multiple stacks	The facility does not have any multiple stack connected to a common source.
WAC 173-400-040(2)(d)	Alternate opacity limit	The facility does not have any alternative opacity limit.
WAC 173-400-040(4)(b) (state and federal versions)	Materials handling, construction, demolition, etc. at emissions unit identified as a significant contributor to nonattainment	The facility is not located in a nonattainment area.
WAC 173-400-040(7) Sulfur dioxide	Emission limit of 1,000 ppmv SO <sub>2</sub> (corrected to 7% O <sub>2</sub> ), average of 60 consecutive minutes	This rule is superseded by: WAC 173-410-040(1)(f)
WAC 173-400-040(9)(b)	Fugitive dust sources identified as significant contributors to PM-10 or PM-2.5 nonattainment	The facility is not located in a PM-10 or PM-2.5 nonattainment area.
WAC 173-400-050(1)	Particulate standards	This regulation is preempted by WAC 173-410-040(2)(c)(i)
WAC 173-400-050(2)	Incinerator carbonyl emission limit of 100 ppmv total carbonyls	The facility does not have this emission unit.
WAC 173-410-040(1)(b)	Average daily emissions of SO <sub>2</sub> shall not exceed 4 lbs/air dried ton of unbleached pulp for facilities which do not incinerate sulfite liquor	The facility incinerates sulfite liquor. Order No. DE 95AQ-I034 provides for a limit of 20 lb/ton of pulp, consistent with a facility which incinerates liquor. The

Citation	Title or Applicability	Reason(s) for Inapplicability
		inapplicability of this rule is facility-wide.
WAC 173-410-040(1)(e)	Sulfur dioxide limitation (300 ppm, hourly average) for recovery systems constructed after 1/24/72	The recovery system was constructed prior to 1/24/72.
WAC 173-410-040(2)(b)	Particulate limitation (0.06 gr/dscf) applicable to recovery systems constructed after 1/24/72	The recovery system was constructed prior to 1/24/72.
WAC 173-410-040(2)(c)(ii)	Particulate limitation for combustion units firing other than wood fuel constructed after 1/1/83	The wood-fired combustion equipment was constructed before 1/1/83.
WAC 173-410-040(2)(c)(iii)	Particulate limitation for combustion units not classified under (c)(i) or (ii) of this subsection	The facility does not have this type of emission unit.
40 CFR Part 60 Subpart D	Fossil-fuel-fired industrial steam generators w/ heat input capacity in excess of 250 MMBtu/hr constructed or modified after August 17, 1971	The hog fuel boiler at the Cosmopolis mill was not constructed or modified after this date. Other steam generating units have capacity less than 250 MMBtu/hr.
40 CFR Part 60 Subpart Da	Standards of Performance for electric utility steam-generating units for which construction commenced after September 18, 1978	There are no units in this source category that have been constructed after the applicability date.
40 CFR Part 60 Subpart Db	NSPS for Industrial-Commercial-Institutional Steam Generating Units	There are no units in this source category.

Citation	Title or Applicability	Reason(s) for Inapplicability
40 CFR Part 60 Subpart Dc	NSPS for Small Industrial-Commercial-Institutional Steam Generating Units	The Cosmopolis mill does not have any units of this size.
40 CFR Part 50	National Primary and Secondary Ambient Air Quality Standards	Applies to airsheds.
40 CFR Part 53	Ambient Air Monitoring Reference and Equivalent Methods	There are no units in this source category.
40 CFR Part 63 Subpart EEEE	Organic Liquids Distribution(Non-gasoline)	EPA Determined that the methanol storage tanks were components of the bleaching system subject to Subpart S and not subject to Subpart EEEE.
40 CFR Part 70	State Operating Permit Programs	Administrative and jurisdictional.
40 CFR Part 72	Permits (Title IV, Acid Rain)	Administrative and jurisdictional; not this source category.
40 CFR Part 73	Sulfur Dioxide Allowance System (Title IV)	There are no units in this source category.
40 CFR Part 75	Continuous Emission Monitoring (Title IV)	There are no units in this source category.
40 CFR Part 77	Excess Emissions (Title IV)	There are no units in this source category.
40 CFR Part 82, except Subparts F	Protection of Stratospheric Ozone	There are no units in this source category.
40 CFR Part 85	Control of Air Pollution from Mobile Sources	There are no units in this source category.
40 CFR Part 86	Control of Air Pollution from New and In-Use Highway Vehicles and Engines	There are no units in this source category.



<b>Citation</b>	<b>Title or Applicability</b>	<b>Reason(s) for Inapplicability</b>
40 CFR Part 88	Clean-Fuel Vehicles	There are no units in this source category.

## APPENDIX B: Abbreviation Used in Permit

Abbreviation	Description
@	At
AAQS	Ambient Air Quality Standards
ADUT	Air dried unbleached ton (contain no greater than 10% water)
ADUTD	Air dried unbleached ton per day
CEDRI	EPA's Compliance and Emissions Data Reporting Interface
CEM	Continuous emission monitoring
CFR	Code of Federal Register
DOE	Department of Ecology
dscf	Dry standard cubic foot
EPA	Environmental Protection Agency
FCAA	Federal Clean Air Act
gr	Grains
HAP	Hazardous air pollutant
IEU	Insignificant emission unit
lb(s)	Pound(s)
MVAC	Motor vehicle air conditioning
NCG	Non-condensable gas
NSPS	New Source Performance Standard
ODP	Oven-dried pulp
ppm	Parts per million
ppmv	Parts per million by volume
RCW	Revised Code of Washington
scf	Standard cubic feet

Abbreviation	Description
tpy	Ton per year
VOC	Volatile organic compound
WAC	Washington Administrative Code

## APPENDIX C: Form and Algorithms

<b>Permit Condition D1: Volatile organic compound emission algorithm</b>		
EPA Method 25 A Modified		mg VOCs carbon/liter
Emission factor (see General Algorithm)		lbs VOC C/ADUT
Volatile organic compounds (see General Algorithm)		lbs VOC C/yr
<b>General Algorithm:</b>		
<p>Emission factor (lbs VOC C/ADUT) = concentration (mg VOC C/L) × 28.32 L/CF × gram/1000 mg × lb/454 gram × air flow by EPA Method 2 (CF/minute) × 60 minutes/hour × [1/ production (hour/ADUT)]</p> <p>lbs VOCs (on a carbon basis)/yr = Annual average daily production (ADUT/day) × emission factor (lbs VOCs/ADUT) × number of operating days/yr</p>		

<b>Permit Condition F1: Mill-wide emissions algorithm</b>		
<b>PULPING GROUP</b>		
DB-26: Nuisance Tower Vent (EPA Method 6 modified)		lbs SO <sub>2</sub> / ADUT
BS-7: No. 1, 2, & 3 BSW vent		lbs SO <sub>2</sub> / ADUT
BS-6: No. 4 BSW & <u>Knotter</u> vent		lbs SO <sub>2</sub> / ADUT
<b>POWER &amp; RECOVERY (see General Algorithm)</b>		
AP-10: Recovery Boilers Combined Stack (EPA Method 6C)		lbs SO <sub>2</sub> / ADUT
<b>COMBINED IEUs CONTRIBUTION (attach Unit Specific Historical Emission Factor)</b>		
Estimated collective IEU's contribution		lbs SO <sub>2</sub> / ADUT
<b>SARA TITLE 304 RELEASE</b>		
SARA Title 304 Release		lbs SO <sub>2</sub> / ADUT
<b>COMBINED LOADING</b>		
<b>TOTAL</b>		lbs SO <sub>2</sub> / ADUT
(Sum of Pulping Group, Power & Recovery, Combined IEUs Contribution)		
<b>General Algorithm:</b>		
$\text{lbs SO}_2/\text{ADUT} = \frac{(\text{ppm SO}_2) \times (64 \text{ lbs SO}_2/\text{lb mole}) \times \text{flow (dscf/min)} \times (1,440 \text{ min/day})}{(1,000,000) \times (385.4 \text{ ft}^3/\text{lb mole @ 20}^\circ\text{C}) \times \text{Production (daily ave ADUST)}}$		

## APPENDIX D: List of Regulatory Orders

Order Docket No.	Issuance Date	Description
DE 95AQ-I034	May 26, 1995	Consolidation of previous NOC requirements for recovery boilers, hogged fuel boiler, and hogged fuel dryer.
DE96AQ-I089	Nov 12, 1996	Approval to construct and operate the COEL system.
DE 94AQ-I018 (Modification)	Jan 12, 1999	Modification of the 1996 NOC for the oxygen delignification/bleaching stage
DE 03AQIS-5813	Dec 5, 2003	Installation and operation of the baghouse for the hogged fuel dryer
2484 AQ-05	May 19, 2005	Rescinds the soot blowing time schedule in Order 95AQ-I034. Requirement to comply with 40 CFR Part 63 Subpart S by Nov 12, 2006 and perform quarterly particulate testing at the recovery boilers common stack.