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AIR OPERATING PERMIT 0000922

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

Port Townsend Paper Corporation
100 Mill Road
Port Townsend, Washington 98368

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

Issued by:

State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Shingo Yamazaki, P.E.
Environmental Engineer
Solid Waste Management Program

James DeMay, P.E.
Industrial Section Manager
Solid Waste Management Program

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INTRODUCTION AND LEGAL AUTHORITY

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

Port Townsend Paper Corporation (PTPC) requires a Title V Air Operating Permit because it emits, or has the potential to emit, 100 tons per year or more of one or more air pollutants (WAC 173-401-300(1)).

During the drafting of this permit, Ecology has attempted to incorporate requirements using the exact language of the law, regulation, or order. In some cases, this has not been possible. 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 applicable requirement cited in the "Applicable Requirements" column of the tables and the citations contained in brackets at the end of each requirement. Any conflict between the permit and an underlying requirement will be resolved by referring to the cited applicable requirement. Unless otherwise stated, the effective date of referenced regulations or statutes is that of the provision in effect on the date of permit issuance. Compliance with underlying requirements shall be demonstrated using the methods specified in this permit.

The Title V Air Operating Permit consists of all parts of this assembled document including all footnotes and Appendices, but does not include the accompanying Statement of Basis or the Title V permit application materials submitted by the facility.

The definitions of terms contained in WAC 173-401-200, and as defined in all referenced regulations, apply to this permit unless otherwise defined in the permit.

Any federal test method referenced, unless specifically stated otherwise within the body of the permit, is that which is contained in 40 CFR Part 60, Appendix A. Any state test method referenced, unless specifically stated otherwise within the body of the permit, is that which is contained in the "Ecology Source Test Manual" as of July 12, 1990.

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

PTPC requires a Title V Air Operating Permit because it emits or has the potential to emit, 100 tons per year or more of one or more air pollutants (WAC 173-401-300(1)). The emission units identified in Conditions A through L are subject to the emission unit specific requirements set forth in Conditions A through L. These units are also subject to the facility-wide applicable requirements. The associated monitoring, recordkeeping, and reporting requirements, for these limits are 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 L is WAC 173-401-615.

The reference test method (RM) or compliance determination algorithm is identified under the column titled, "Monitoring and Reporting." The identified reference test method or compliance determination algorithm is the compliance determination method which is intended to be the default or absolute determinant of compliance. It may or may not also be the method by which ongoing compliance is indicated.

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

Appendix A contains the emission estimate algorithms. 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 emission estimate. Unless otherwise required by the applicable requirement, minor modifications to the test method may be used with the advanced approval of Ecology. In addition, the Permittee may use an equivalent alternative method with written approval from Ecology. Failure to obtain prior written approval for any test changes may invalidate the use of the test result(s) for Title V compliance purposes.

A. RECOVERY FURNACE (RF)

The emission unit shall comply with the General Requirements of 40 CFR 63 as listed in Table 1 of Subpart MM.

RF	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
A.1a	Particulate (PM)	0.08 gr/dscf @ 8% O ₂ , 1-hr average	<p><i>Performance Testing:</i></p> <p>Sample M/Q/S/A³ using EPA RM 5 using at least three runs of at least one hour per run.</p> <p>See Facility-wide General Requirement, Condition 37 for notification requirements.</p> <p><i>Reporting:</i></p> <p>Submit source test results in the monthly air report, due after results received by the Permittee. Include the following elements:</p> <ol style="list-style-type: none"> 1. Average opacity during each source test run. 2. Sufficient data to allow verification of source test results. 3. Air flow split between ESP chambers. 4. Average black liquor flow rate, density, and % solids during source test. 5. As alternative to #4, PTPC can estimate the total solids fired during the source test run. 6. Log, every hour during the source test, primary and secondary voltage and current, and spark rate (if available) for each TRC unit. 7. Exhaust stack percent O₂. <p>See Facility-wide General Requirement, Condition 38 for additional source test report requirements.</p> <p><i>Compliance Assurance Monitoring:</i></p>	<p>Order 2892-05AQ, Modification 2 for limit, operating parameter recordings, and reporting requirements</p> <p>40 CFR 70.6(c)(1) for M/Q/S/A source testing frequency</p> <p>40 CFR 64.2 and 64.6 through 64.9 for respective PM CAM monitoring and reporting/recordkeeping</p>

RF	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			<p>The Permittee shall comply with the general CAM requirements in Condition O. The Permittee must comply with the monitoring, corrective action, and violation determination requirements in Condition A.3b.</p> <p>CAM reporting required on at a minimum semiannual basis.</p>	
A.1b	PM	0.10 gr/dscf @ 8% O ₂ , 1-hr average	Same as for Condition A.1a.	WAC 173-405-040(1)(a) for limit 40 CFR 64.2 and 64.6 through 64.9 for respective PM CAM monitoring and reporting/recordkeeping
A.2	HAP Metals (PM as surrogate)	0.044 gr/dscf @ 8% O ₂	<p><i>Performance Testing:</i></p> <p>Sample every 5 years using EPA RM 5. Water must be used as the cleanup solvent instead of acetone in the sample recovery procedure. First periodic performance test must be conducted by October 13, 2020 and thereafter every 5 years following the previous performance test. Performance testing to be conducted in accordance with 40 CFR 63.865.</p> <p><i>Representative Conditions:</i></p> <p>Performance tests shall be conducted based on representative performance during the period being tested. The owner/operator must record the process information that is necessary to document operating conditions during the test and include in such record an explanation to support that such conditions represent normal operation. Upon request, the owner/operator</p>	<p>40 CFR 63.862(a)(1)(i)(A) for standard</p> <p>40 CFR 63.863(c)(1) for 5-year periodic performance test compliance date</p> <p>40 CFR 63.865 for performance testing requirements</p> <p>40 CFR 63.9(e) and 40 CFR 63.7(b) for</p>

RF	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			<p>shall make available such records as may be necessary to determine the conditions of performance tests.</p> <p><i>60-day notification:</i></p> <p>The Permittee must notify Ecology in writing of their intention to conduct a performance test at least 60 calendar days before the performance test is initially scheduled to begin.</p> <p><i>Recordkeeping:</i></p> <p>The Permittee must maintain records of:</p> <ol style="list-style-type: none"> 1) All results of performance tests; 2) The process information that is necessary to document operating conditions during the test and include in such record an explanation to support that such conditions represent normal operation; 3) Documentation of supporting calculations for compliance determinations made under 40 CFR 63.865(a) through (d); 4) For each failure to meet the emission limit, the number of failures, the date, start time, and duration of each event; 5) For any failure to meet the emission limit, record an estimate of the quantity of each regulated pollutant emitted over the emission limit and a description of the method used to estimate the emissions. <p><i>Reporting:</i></p> <p>Report failures to meet the applicable standard in the <i>Semi-Annual Excess Emissions and Continuous Monitoring Systems Performance or Summary Report</i> in accordance with 40 CFR 63.867(c), delivered or postmarked by July 30 or January 30 following the end of the respective calendar half (or on a more frequent basis as determined necessary by Ecology).</p>	<p>performance test notification</p> <p>40 CFR 63.865 and 40 CFR 63.866 for recordkeeping</p> <p>40 CFR 63.867(d) for electronic reporting</p>

RF	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			<p>Within 60 days after the date of completing each performance test, submit the results of the performance test electronically via EPA's Compliance and Emissions Data Reporting Interface (CEDRI) in accordance with 40 CFR 63.867(d).</p> <p>Include source test results in the monthly air report, due after results received by the Permittee.</p>	
A.3a	Opacity	35% average for more than 6 consecutive minutes in any 60 minute period	<p>Compliance demonstrated with COMS and EPA RM 9 is the reference test method.</p> <p>Monitor continuously using a Continuous Opacity Monitoring System (COMS) that conforms to 40 CFR Part 60, Appendix F and Appendix B, Performance Specification 1.</p> <p>See Facility-wide General Requirement, Condition 26 for continuous monitoring system (CMS) operating requirements.</p> <p>Report daily maximum six-minute average opacity, daily average opacity, and exceedances in the monthly air report.</p>	<p>WAC 173-405-040(6) for opacity limit</p> <p>WAC 173-401-615 for monitoring</p>
A.3b	HAP Metals (Opacity as surrogate) Operating Limit	Opacity greater than 35% for 2% or more of operating time during a semiannual period	<p><i>Monitoring:</i></p> <p>Monitor opacity using a COMS which is installed, calibrated, maintained, and operated in accordance with Performance Specification 1 (PS-1) in appendix B to 40 CFR Part 60 and the provisions in §63.6(h) and §63.8 and §63.864(d)(3) and (4).</p> <p>See Facility-wide General Requirement, Condition 28 for CMS data recovery requirements.</p> <p><i>Monitoring Exceedances:</i></p>	<p>40 CFR 63.864 for monitoring requirements</p> <p>40 CFR 63.864(k) for ongoing compliance and violation determination</p> <p>40 CFR 63.866 for recordkeeping requirements</p>

RF	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			<p>The Permittee is required to implement corrective action if the average of ten consecutive 6-minute averages results in a measurement greater than 20 percent opacity.</p> <p><i>Violation Determination:</i></p> <p>A violation of the underlying HAP Metals standard in Condition A.2 occurs when opacity is greater than 35 percent for 2 percent or more of operating time during a semiannual period while spent pulping liquor is fed.</p> <p><i>Recordkeeping:</i></p> <p>The Permittee must maintain records of:</p> <ol style="list-style-type: none"> 1) Black liquor solids firing rates in units of Mg/d or ton/d; 2) Any occurrence when corrective action is required and when a violation is noted; 3) For each failure to meet the opacity operating limit, the number of failures, the date, start time, and duration of each event; 4) For each failure to meet the opacity operating limit, an estimate of the quantity of each regulated pollutant emitted over the emission limit and a description of the method used to estimate the emissions; 5) Record actions taken to minimize emissions in accordance with §63.860(d) and any corrective actions taken to return the affected unit to its normal or usual manner of operation. <p><i>Reporting:</i></p> <p>Report monitoring exceedances (as defined above) and associated corrective action monthly to Ecology.</p> <p>The Permittee must submit a <i>Semi-Annual Excess Emissions and Continuous Monitoring Systems Performance or Summary Report</i> in accordance with 40 CFR 63.10(e)(3) and 40 CFR 63.867(c), delivered or postmarked by July 30 or</p>	<p>40 CFR 63.867(c) for excess emission reporting requirements</p>

RF	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			January 30 following the end of the respective calendar half (or on a more frequent basis as determined necessary by Ecology).	
A.4a	SO ₂	200 ppm @ 8% O ₂ , 1-hour average	<p><i>Performance Testing:</i></p> <p>Sample M/Q/S/A³ using EPA modified RM 6.</p> <p>See Facility-wide General Requirement, Condition 37 for notification requirements.</p> <p><i>Reporting:</i></p> <p>Submit source test results in the monthly air report due after results received by the facility. See Facility-wide General Requirement, Condition 38 for source test report requirements.</p>	<p>PSD-I, Condition 2 for limit</p> <p>WAC 173-401-615 for test method, frequency, and reporting</p>
A.4b	SO ₂	500 ppm @ 8% O ₂ , 1-hr average	Same as above.	WAC 173-405-040(9)(a) for limit
A.5	HAPs	N/A	<p>The Permittee must maintain proper operation of the electrostatic precipitator's automatic voltage control (AVC).</p> <p>The Permittee must maintain records demonstrating compliance with the requirement to maintain proper operation of an electrostatic precipitator AVC.</p>	<p>40 CFR 63.864(e)(1) for AVC requirement</p> <p>40 CFR 63.866(c)(8) for recordkeeping</p>
A.6	Operations and Maintenance	N/A	At all times, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the owner or operator to make any further efforts to reduce emissions if levels required by the applicable standard have been	40 CFR 63.860(d)

RF	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.	
A.7	Operations and Maintenance	N/A	Operations and maintenance manual for the Recovery Furnace shall be developed and followed. A copy of the manual shall be available to Ecology upon request. Emissions that result from a failure to follow the requirements of the manual may be considered proof that the equipment was not properly operated and maintained.	Order 2892-05AQ, Modification 1, Condition 11

The following state-only Recovery Furnace requirements are not federally enforceable under the federal Clean Air Act.

RF	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
A.8	PM	0.05 gr/dscf @ 8% O ₂ , 1-hour average	<p><i>Performance Testing:</i></p> <p>Sample M/Q/S/A³ using EPA RM 5.</p> <p>See Facility-wide General Requirement, Condition 37 for notification requirements.</p> <p><i>Reporting:</i></p> <p>Submit source test results in the monthly air report due after results received by the facility. See Facility-wide General Requirement, Condition 38 for source test report requirements.</p>	<p>Order 2892-05AQ, Modification 2, Appendix A, Condition A.2</p> <p>40 CFR 70.6(c)(1) for performance testing frequency</p>

RF	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
A.9	Total Reduced Sulfur (TRS)	5.0 ppm @ 8% O ₂ , 24-hour average	<p><i>Monitoring:</i></p> <p>Monitor continuously using an approved CEMS that conforms to 40 CFR Part 60, App. F and to App. B, Perf. Spec. 5.</p> <p>See Facility-wide General Requirement, Condition 26 for CMS operating requirements.</p> <p><i>Reporting:</i></p> <p>Report calendar day 24-hour averages and limit exceedances monthly.</p>	<p>WAC 173-405-040(1)(c) for limit</p> <p>Order 2892-05AQ, Modification 2 for monitoring and reporting</p> <p>WAC 173-401-615 for additional monitoring</p>
A.10 a	O ₂	No limit - required to correct TRS data	<p>Monitor continuously using an approved CEMS that conforms to 40 CFR Part 60, App. F and to App. B, Perf. Spec. 3.</p> <p>See Facility-wide General Requirement, Condition 26 for CMS operating requirements.</p>	<p>Order 2892-05AQ, Modification 2, Appendix A, Condition A.4</p>
A.10 b	O ₂ (Operation and Maintenance)	13% O ₂ daily average for 3-consecutive days (corrective action trigger)	<p>Monitoring same as Condition A.10a. If monitoring indicates daily average O₂ in excess of 13% for three consecutive days from the RF exhaust stack, the Permittee must inspect the RF system for ducting holes or other sources of dilution air within 3 days and begin corrective action as necessary. Report excursions, inspection results, and corrective actions monthly.</p>	<p>WAC 173-405-040(8) for operation and maintenance</p> <p>WAC 173-401-615(1)(b) for monitoring requirement</p>

B. SMELT DISSOLVER TANK (SDT)

The emission unit shall comply with the General Requirements of 40 CFR 63 as listed in Table 1 of Subpart MM.

SDT	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
B.1	PM	0.30 lb/ton of black liquor solids (TBLS), 1-hour average	<p><i>Performance Testing:</i></p> <p>Sample M/Q/S/A³ using EPA RM 5.</p> <p>See Facility-wide General Requirement, Condition 37 for notification requirements.</p> <p><i>Reporting:</i></p> <p>Include source test results in the monthly air report, due after results received by the Permittee. See Facility-wide General Requirement, Condition 38 for source test report requirements.</p> <p><i>Compliance Assurance Monitoring:</i></p> <p>The Permittee shall comply with the general CAM requirements in Condition O. The Permittee must comply with the monitoring, corrective action, and violation determination requirements in Condition B.3.</p> <p>CAM reporting required on at a minimum semiannual basis.</p>	<p>WAC 173-405-040(2)</p> <p>WAC 173-401-615 for performance testing and reporting</p> <p>40 CFR 64.2 and 64.6 through 64.9 for respective PM CAM monitoring and reporting/recordkeeping</p>
B.2	HAP Metals (PM as surrogate)	0.20 lb/TBLS (0.10 kg/Mg of black liquor solids fired)	<p><i>Performance Testing:</i></p> <p>Sample every 5 years using EPA RM 5. Water must be used as the cleanup solvent instead of acetone in the sample recovery procedure. First periodic performance test must be conducted by October 13, 2020 and thereafter every 5 years following the previous performance test. Performance testing to be conducted in accordance with 40 CFR 63.865.</p>	<p>40 CFR 63.862(a)(1)(i)(B) for standard</p> <p>40 CFR 63.863(c)(1) for 5-year periodic performance test compliance date</p>

SDT	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
			<p><i>Representative Conditions:</i></p> <p>Performance tests shall be conducted based on representative performance during the period being tested. The owner/operator must record the process information that is necessary to document operating conditions during the test and include in such record an explanation to support that such conditions represent normal operation. Upon request, the owner/operator shall make available such records as may be necessary to determine the conditions of performance tests.</p> <p><i>60-day notification:</i></p> <p>The Permittee must notify Ecology in writing of their intention to conduct a performance test at least 60 calendar days before the performance test is initially scheduled.</p> <p><i>Recordkeeping:</i></p> <p>The Permittee must maintain records of:</p> <ol style="list-style-type: none"> 1) All results of performance tests; 2) The process information that is necessary to document operating conditions during the test and include in such record an explanation to support that such conditions represent normal operation; 3) Documentation of supporting calculations for compliance determinations made under 40 CFR 63.865(a) through (d); 4) For each failure to meet the emission limit, the number of failures, the date, start time, and duration of each event; 5) For any failure to meet the emission limit, record an estimate of the quantity of each regulated pollutant emitted over the 	<p>40 CFR 63.865 for performance testing requirements</p> <p>40 CFR 63.9(e) and 40 CFR 63.7(b) for performance test notification</p> <p>40 CFR 63.865 and 40 CFR 63.866 for recordkeeping</p> <p>40 CFR 63.867(d) for electronic reporting</p>

SDT	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
			<p>emission limit and a description of the method used to estimate the emissions.</p> <p><i>Reporting:</i></p> <p>Report failures to meet the applicable standard in the <i>Semi-Annual Excess Emissions and Continuous Monitoring Systems Performance or Summary Report</i> in accordance with 40 CFR 63.867(c), delivered or postmarked by July 30 or January 30 following the end of the respective calendar half (or on a more frequent basis as determined necessary by Ecology).</p> <p>Within 60 days after the date of completing each performance test, submit the results of the performance test electronically via EPA's Compliance and Emissions Data Reporting Interface (CEDRI) in accordance with 40 CFR 63.867(d).</p> <p>Include source test results in the monthly air report, due after results received by the Permittee.</p>	
B.3	Opacity	35% average for more than 6 consecutive minutes in any 60 minute period	<p>EPA RM 9 is the reference test method.</p> <p><i>Compliance Assurance Monitoring:</i></p> <p>The Permittee shall comply with the general CAM requirements in Condition O.</p> <p>The Permittee must maintain and properly operate a monitoring device (in accordance with manufacturer specifications) for the continuous measurement of the scrubbing liquid flow rate.</p> <p>The Permittee must maintain scrubbing liquid flow rate ≥ 50 gpm. An excursion is defined as any hour in which scrubber flow is < 50 gpm for more than six consecutive minutes. Take corrective action</p>	<p>WAC 173-405-040(6)</p> <p>40 CFR 64.2 and 64.6 through 64.9 for respective PM CAM monitoring and reporting/recordkeeping</p>

SDT	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
			<p>immediately following an excursion. Failure to take corrective action within 24 hours is a violation.</p> <p>The Permittee must reconfirm the existing scrubber liquid flow rate operational parameter or establish an updated scrubber liquid flow rate operational parameter. Reconfirmed or reestablished scrubber operational parameter and updated CAM plan (as needed) must be submitted to Ecology within 180 days of issuance of the permit renewal. The updated operational parameter will become effective upon approval by Ecology.</p> <p>The Permittee must comply with Conditions B.5, B.6, and B.7 for compliance assurance monitoring.</p> <p><i>Reporting:</i></p> <p>Report excursions in the monthly report.</p> <p>CAM reporting required on at a minimum semiannual basis.</p>	
B.4	HAP Metals (Scrubber Operating Limits as surrogate)	Five monitoring parameter values below the minimum operating limits during any semiannual reporting period	<p><i>Monitoring:</i></p> <p>The Permittee must calibrate, maintain, and operate a continuous parametric monitoring system (CPMS) that can be used to determine and record the scrubbing liquid flow rate at least once every successive 15-minute period using the procedures in 40 CFR 63.8(c), as well as the procedures in 40 CFR 63.864(e)(10)(i) and (ii).</p> <p>The Permittee must install, maintain, and operate a monitoring device for measurement of scrubber fan amperage.</p> <p>The Permittee must establish operating limits for scrubbing liquid flow rate and fan amperage based on performance testing in accordance with 40 CFR 63.864(j).</p>	<p>40 CFR 63.860 for requirement to minimize emissions</p> <p>40 CFR 63.864 for monitoring requirements</p> <p>40 CFR 63.864(k) for ongoing compliance and violation determination</p> <p>40 CFR 63.866 for recordkeeping requirements</p>

SDT	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
			<p>See Facility-wide General Requirement, Condition 28 for CMS data recovery requirements.</p> <p>Scrubbing liquid flow rate is to be maintained ≥ 99 gpm (3-hr avg) or as established in the most recent performance test.</p> <p>Scrubber fan amperage is to be maintained ≥ 45 amps (3-hr avg) or as established in the most recent performance test.</p> <p><i>Monitoring Exceedance:</i></p> <p>The Permittee is required to implement corrective action when the 3-hr average parameter value is below the minimum operating limit established, during times when spent pulping liquor is fed.</p> <p><i>Violation Determination:</i></p> <p>A violation occurs when six or more 3-hour average parameter values within any 6-month reporting period are below the minimum operating limits established.</p> <p>For purposes of determining the number of monitoring exceedances, no more than one exceedance will be attributed to any given 24-hour period.</p> <p><i>Recordkeeping:</i></p> <p>The Permittee must maintain records of:</p> <ul style="list-style-type: none"> A. Any occurrence when corrective action is required and when a violation is noted; B. Records of parameter monitoring data required under §63.864, including any period when the operating parameter levels were inconsistent with the levels established during the performance test, with a brief explanation of the cause of the 	<p>40 CFR 63.867(c) for excess emission reporting requirements</p>

SDT	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
			<p>monitoring exceedance, the time the monitoring exceedance occurred, the time corrective action was initiated and completed, and the corrective action taken;</p> <p>C. Records of parameter operating limits established for each affected source or process unit;</p> <p>D. For each failure to meet the operating limits, the number of failures, date, start time, and duration of each event;</p> <p>E. For each failure to meet an operating limit, maintain sufficient information to estimate the quantity of each regulated pollutant emitted over the emission limit. This information must be sufficient to provide a reliable emissions estimate if requested by the Administrator; and</p> <p>F. Record actions taken to minimize emissions in accordance with §63.860(d) and any corrective actions taken to return the affected unit to its normal or usual manner of operation.</p> <p><i>Reporting:</i></p> <p>Report minimum daily 3-hour average scrubbing liquid flow, minimum daily 3-hour average fan amperage, and monitoring exceedances and associated corrective actions monthly to Ecology.</p> <p>The Permittee must submit a <i>Semi-Annual Excess Emissions and Continuous Monitoring Systems Performance or Summary Report</i> in accordance with 40 CFR 63.10(e)(3) and 40 CFR 63.867(c), delivered or postmarked by the 30th day following the end of each calendar half (or on a more frequent basis as determined necessary by Ecology).</p>	

SDT	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
B.5	Damper Inspections	N/A	<p>The Permittee must visually inspect the Smelt Dissolver Tank damper indicator arm position at a minimum of once per day of operation.</p> <p>If the damper indicator arm is noted to be in the open position, the following corrective actions must be taken:</p> <ol style="list-style-type: none"> 1) Close the damper as soon as possible to prevent further bypass of the air pollution control equipment; 2) Investigate the cause of the opening of the damper and correct any deficiencies or failures of the equipment to prevent recurrence; and 3) Provide details regarding date, time, estimated duration of bypass, corrective actions, and estimated emission in the appropriate monthly report. <p>Maintain records of visual inspection. Records must be maintained on-site and available for inspection by Ecology for a period of five years.</p>	Compliance Order 18124, Condition 1 and 5
B.6	Annual Damper Testing	N/A	<p>The Permittee must perform non-destructive tests on the Smelt Dissolver Tank damper welds and ensure the u-bolts are sufficiently tightened to maintain the damper arm in the closed position.</p> <p>Maintain records of annual damper testing. Records must be maintained on-site and available for inspection by Ecology for a period of five years.</p>	Compliance Order 18124, Condition 2 and 5

SDT	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
B.7	Observation Hatch	N/A	<p>Install and maintain an observation hatch that can be used to visually inspect or physically verify the damper position.</p> <p>On a weekly basis, visually inspect or physically verify the damper is properly positioned and functioning.</p> <p>In the event that improper damper position or function is observed, corrective action must be taken. Report details regarding date, time, estimated duration of bypass, corrective actions taken, and estimated emission to Ecology in the monthly air report.</p> <p>Maintain records of visual inspection. Records must be maintained on-site and available for inspection by Ecology for a period of five years.</p>	Compliance Order 18124, Condition 3, 4, and 5

C. LIME KILN (LK)

The emission unit shall comply with the General Requirements of 40 CFR 63 as listed in Table 1 of Subpart MM.

LK	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
C.1	PM	0.13 gr/dscf @ 10% O ₂ , 1-hr average	<p><i>Performance Testing:</i></p> <p>Sample M/Q/S/A³ using RM 5.</p> <p>See Facility-wide General Requirement, Condition 37 for notification requirements.</p> <p><i>Reporting</i></p> <p>Submit source test results in the monthly air report, due after results received by the Permittee. See Facility-wide General Requirement, Condition 38 for source test report requirements.</p>	<p>WAC 173-405-040(3)(a)</p> <p>WAC 173-401-615 for performance testing and reporting</p> <p>40 CFR 64.2 and 64.6 through 64.9 for respective PM CAM monitoring and reporting/recordkeeping</p>

LK	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			<p><i>Compliance Assurance Monitoring:</i></p> <p>The Permittee shall comply with the general CAM requirements in Condition O. The Permittee must comply with the monitoring, corrective action, and violation determination requirements in Condition C.3.</p> <p>CAM reporting required on at a minimum semiannual basis.</p>	
C.2	HAP Metals (PM as a surrogate)	0.064 gr/dscf (0.15 g/dscm) @10% O ₂	<p><i>Performance Testing:</i></p> <p>Sample every 5 years using EPA RM 5. Water must be used as the cleanup solvent instead of acetone in the sample recovery procedure. First periodic performance test must be conducted by October 13, 2020 and thereafter every 5 years following the previous performance test. Performance testing to be conducted in accordance with 40 CFR 63.865.</p> <p><i>Representative Conditions:</i></p> <p>Performance tests shall be conducted based on representative performance during the period being tested. The owner/operator must record the process information that is necessary to document operating conditions during the test and include in such record an explanation to support that such conditions represent normal operation. Upon request, the owner/operator shall make available such records as may be necessary to determine the conditions of performance tests.</p> <p><i>60-day notification:</i></p>	<p>40 CFR 63.862(a)(1)(i)(C) for standard</p> <p>40 CFR 63.865 for performance testing requirements</p> <p>40 CFR 63.9(e) and 40 CFR 63.7(b) for performance test notification</p> <p>40 CFR 63.865 and 40 CFR 63.866 for recordkeeping</p> <p>40 CFR 63.867(d) for electronic reporting</p>

LK	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			<p>The Permittee must notify Ecology in writing of their intention to conduct a performance test at least 60 calendar days before the performance test is initially scheduled.</p> <p><i>Recordkeeping:</i></p> <p>The Permittee must maintain records of:</p> <ol style="list-style-type: none"> 1) All results of performance tests; 2) The process information that is necessary to document operating conditions during the test and include in such record an explanation to support that such conditions represent normal operation; 3) Documentation of supporting calculations for compliance determinations made under 40 CFR 63.865(a) through (d); 4) For each failure to meet the emission limit, the number of failures, the date, start time, and duration of each event; 5) For any failure to meet the emission limit, record an estimate of the quantity of each regulated pollutant emitted over the emission limit and a description of the method used to estimate the emissions. <p><i>Reporting:</i></p> <p>Report failures to meet the applicable standard in the <i>Semi-Annual Excess Emissions and Continuous Monitoring Systems Performance or Summary Report</i> in accordance with 40 CFR 63.867(c), delivered or postmarked by July 30 or January 30 following the end of the respective calendar half (or on a more frequent basis as determined necessary by Ecology).</p> <p>Within 60 days after the date of completing each performance test, submit the results of the performance test electronically via EPA's</p>	

LK	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			<p>Compliance and Emissions Data Reporting Interface (CEDRI) in accordance with 40 CFR 63.867(d).</p> <p>Include source test results in the monthly air report, due after results received by the Permittee.</p>	
C.3	Opacity	35% average for more than 6 consecutive minutes in any 60 minute period	<p>EPA RM 9 is the reference test method.</p> <p><i>Compliance Assurance Monitoring:</i></p> <p>The Permittee shall comply with the general CAM requirements in Condition O.</p> <p>Ongoing compliance indicated by maintaining venturi pressure drop ≥ 8 inches of H₂O (gauge). The pressure drop operating parameter must be updated or reconfirmed and submitted to Ecology within 180 days of issuance of the permit renewal. An excursion is defined as any hour in which the pressure drop is < 8 inches of H₂O (gauge) for more than six consecutive minutes. Take corrective action immediately following an excursion. Failure to take corrective action within 24 hours is a violation.</p> <p>The Permittee must establish and submit for Ecology approval a scrubber liquid flow rate operating parameter and updated CAM Plan that assures compliance with the emission standard within 180 days of issuance of the permit renewal.</p> <p>Continuous parameter monitors must be maintained and operated in accordance with manufacturer specifications.</p> <p>The Permittee may use updated venturi pressure drop and/or scrubber liquid flow rate values to demonstrate continuous compliance upon approval from Ecology.</p>	<p>WAC 173-405-040(6)</p> <p>40 CFR 64.2 and 64.6 through 64.9 for respective PM CAM monitoring and reporting/recordkeeping</p>

LK	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			<p><i>Monitoring and Reporting:</i></p> <p>Monitor scrubber pressure drop and scrubber liquid flow rate (once established) continuously; record continuously; report excursions in the monthly report.</p> <p>CAM reporting required on at a minimum semiannual basis.</p>	
C.4	HAP Metals (Scrubber Operating Limit as a surrogate)	Five monitoring parameter values below (for either the pressure drop across the scrubber or the scrubber liquid flow rate) the minimum operating limits during any semiannual reporting period	<p><i>Monitoring:</i></p> <p>The Permittee must calibrate, maintain, and operate a CPMS that can be used to determine and record the pressure drop across the scrubber and the scrubbing liquid flow rate at least once every successive 15-minute period using the procedures in 40 CFR 63.8(c), as well as the procedures in 40 CFR 63.864(e)(10)(i) and (ii).</p> <p>The Permittee must establish operating limits for pressure drop across the scrubber and the scrubbing liquid flow rate based on performance testing in accordance with 40 CFR 63.864(j).</p> <p>See Facility-wide General Requirement, Condition 28 for CMS data recovery requirements.</p> <p><i>Monitoring Exceedance:</i></p> <p>The Permittee is required to implement corrective action when any 3-hr average parameter value is below the minimum operating limit established, during times when lime mud is fed, with the exception of pressure drop during startup and shutdown.</p> <p><i>Violation Determination:</i></p> <p>A violation of the underlying HAP Metal standard in Condition C.2 occurs when six or more 3-hour average parameter values within any 6-month reporting period are below the minimum operating limits</p>	<p>40 CFR 63.860 for requirement to minimize emissions</p> <p>40 CFR 63.864 for monitoring requirements</p> <p>40 CFR 63.864(k) for ongoing compliance and violation determination</p> <p>40 CFR 63.866 for recordkeeping requirements</p> <p>40 CFR 63.867(c) for excess emission reporting requirements</p>

LK	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			<p>established, with the exception of pressure drop during startup and shutdown.</p> <p>For purposes of determining the number of monitoring exceedances, no more than one exceedance will be attributed to any given 24-hour period.</p> <p><i>Recordkeeping:</i></p> <p>The Permittee must maintain records of:</p> <ol style="list-style-type: none"> 1) CaO production rates in units of Mg/d or ton/day; 2) Any occurrence when corrective action is required and when a violation is noted; 3) Records of parameter monitoring data required under §63.864, including any period when the operating parameter levels were inconsistent with the levels established during the performance test, with a brief explanation of the cause of the monitoring exceedance, the time the monitoring exceedance occurred, the time corrective action was initiated and completed, and the corrective action taken; 4) Records of parameter operating limits established for each affected source or process unit; 5) For each failure to meet the operating limits, the number for failures, date, start time, and duration of each event; 6) For each failure to meet an operating limit, maintain sufficient information to estimate the quantity of each regulated pollutant emitted over the emission limit. This information must be sufficient to provide a reliable emissions estimate if requested by the Administrator. 	

LK	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			<p>7) Record actions taken to minimize emissions in accordance with §63.860(d) and any corrective actions taken to return the affected unit to its normal or usual manner of operation.</p> <p><i>Reporting:</i></p> <p>Report minimum daily 3-hour average pressure drop, minimum daily 3-hour average scrubber liquid flow rate, and monitoring exceedances and associated corrective actions monthly to Ecology.</p> <p>The Permittee must submit a <i>Semi-Annual Excess Emissions and Continuous Monitoring Systems Performance or Summary Report</i> in accordance with 40 CFR 63.10(e)(3) and 40 CFR 63.867(c), delivered or postmarked by the 30th day following the end of each calendar half (or on a more frequent basis as determined necessary by Ecology).</p>	
C.5	SO ₂	500 ppm @ 10% O ₂ , 1-hr average	<p><i>Performance Testing:</i></p> <p>Sample M/Q/S/A³ using EPA modified RM 6.</p> <p>See Facility-wide General Requirement, Condition 37 for notification requirements.</p> <p><i>Reporting:</i></p> <p>Include source test results in the monthly air report due after results received by the facility. See Facility-wide General Requirement, Condition 38 for source test report requirements.</p>	<p>WAC 173-405-040 (11)(a) for limit</p> <p>WAC 173-401-615 for performance testing and reporting</p>
C.6a	TRS (as H ₂ S)	8 ppmdv @ 10% O ₂ , 12-hour average	<p><i>Monitoring:</i></p> <p>Monitor continuously using a CEMS that conforms to 40 CFR Part 60, Appendix F and Appendix B, PS-5. See Facility-wide General Requirement, Condition 26 for CMS data recovery requirements.</p>	<p>Order 2892-05AQ, Modification 2, Appendix 2, Condition B.1</p>

LK	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			<p>Calculate and record on a daily basis 12-hour average TRS and oxygen concentrations pursuant to Condition C.7 for two consecutive periods of each operating day. Each 12-hour average shall be determined as the arithmetic mean of the appropriate 12 contiguous 1-hour average TRS concentrations provided by the CEMS using the following equation:</p> $C_{corr} = C_{meas} \times (21 - X) / (21 - Y)$ <p><i>where:</i></p> <p>C_{corr} = the concentration corrected for oxygen</p> <p>C_{meas} = the concentration uncorrected for oxygen</p> <p>X = the volumetric oxygen concentration in percentage to be corrected to (8 percent for recovery furnaces and 10 percent for lime kilns, incinerators, or other devices)</p> <p>Y = the measured 12-hour average volumetric oxygen concentration.</p> <p><i>Reporting:</i></p> <p>Report daily maximum concentrations, 12-hr average concentrations, maximum monthly 12-hr concentrations, and exceedances monthly.</p>	<p>for compliance with incineration of waste gases from NSPS units (Condition F)</p>

LK	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
C.6b	TRS	Temperature \geq 1,200 F and retention time \geq 0.5 seconds when burning NCGs	See Condition C.6a for compliance demonstration when burning NCGs.	40 CFR 60.283(a)(1)(iii) for limit WAC 173-401-615(1)(b) for monitoring gap filling
C.7	O ₂	No limit – required for O ₂ correction	<p>Monitor and record the percent oxygen by volume on a dry basis, using a CEMS that conforms to 40 CFR Part 60, Appendix F and Appendix B, PS-3.</p> <p>See Facility-wide General Requirement, Condition 26 for continuous emission monitoring system-operating requirements.</p> <p>Calculate and record on a daily basis 12-hour average oxygen concentrations for the two consecutive periods of each operating day. These 12-hour averages shall correspond to the 12-hour average TRS concentrations in Condition C.6a and shall be determined as an arithmetic mean of the appropriate 12 contiguous 1-hour average oxygen concentrations provided by the continuous monitoring system.</p>	Order 2892-05AQ, Modification 2, Appendix A, Condition B.2
C.8	Stack Height	N/A	Stack Height shall be \geq 31 meters before production exceeds 650 tons/D unbleached pulp. PTPC has certified stack height is \geq 31 meters. Report if stack is shortened.	PSD-I

LK	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
C.9	Operations and Maintenance	N/A	Operations and maintenance manual for the Lime Kiln shall be developed and followed. A copy of the manual shall be available to Ecology upon request. Emissions that result from a failure to follow the requirements of the manual may be considered proof that the equipment was not properly operated and maintained.	Order 2892-05AQ, Modification 1, Condition 11

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

LK	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
C.10	TRS	20 ppm @ 10% O ₂ , 24-hr average	Same as Condition C.6a.	WAC 173-405-040(3)(c) for limit
C.11	TRS	80 ppm H ₂ S @ 10% O ₂ for more than 2 consecutive hours	Monitor TRS continuously using an approved CEMS that conforms to 40 CFR 60, App. F and App. B, Perf. Spec. 5 ¹¹ . Report excursions monthly (if the upper range of the monitor is less than 80 ppm, all off scale measurements shall be considered >80 ppm). All TRS monitored is considered H ₂ S for this limit.	WAC 173-405-040(3)(b) for limit Order 2892-05AQ (Table 1, C.4) for basis of monitoring

D. POWER BOILER #10 (PB10)

The source shall also comply with the General Requirements of 40 CFR Part 60, including:

- 40 CFR 60.7(b) & (f) concerning recordkeeping,
- 40 CFR 60.7(c), (d), & (e) concerning reporting,
- 40 CFR 60.11(d) concerning operation and maintenance,
- 40 CFR 60.12 concerning concealment,
- 40 CFR 60.13 concerning monitoring,

40 CFR 60.19 concerning notification and reporting.

PB10 shall comply with the General Requirements of 40 CFR Part 63 as listed in Table 10 of Subpart DDDDD.

PB10	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
D.1a	Particulate (PM)	0.10 lb/mmBtu, 1-hr average	<p><i>Performance Testing:</i></p> <p>Sample M/Q/S/A³ using EPA RM 5. Performance testing to be conducted in accordance with 40 CFR 60.46.</p> <p>See Facility-wide General Requirement, Condition 37 for notification requirements.</p> <p>Continuous compliance demonstrated by compliance with Condition D3.a.</p> <p><i>Reporting:</i></p> <p>Include source test results in the monthly air report due after results received by the facility. See Facility-wide General Requirement, Condition 38 for source test report requirements.</p>	<p>40 CFR 60.42(a)(1) for limit</p> <p>40 CFR 60.46(b)(2) for test method</p>
D.1b	PM	0.2 grains/dscf @ 7% O ₂	<p>Same as above.</p> <p><i>Compliance Assurance Monitoring:</i></p> <p>The Permittee must comply with the monitoring requirements in Condition D.3a. Take corrective action immediately following an exceedance as defined in Condition D.3a. Failure to take corrective action within 24 hours is a violation of the limit.</p> <p>The Permittee shall comply with the general CAM requirements in Condition O.</p>	<p>WAC 173-405-040(5)(a)</p> <p>40 CFR 64.2 and 64.6 through 64.9 for respective PM CAM monitoring and reporting/recordkeeping</p>

PB10	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			CAM reporting required on a semiannual basis, at a minimum.	
D.2	HAP metals (Filterable PM as a surrogate)	3.7 E-02 lb/MMBtu of heat input (Boiler MACT Emission Limit)	<p><i>Performance Testing:</i></p> <p>Reference Test Method is EPA RM 5. Collect a minimum of 2 dscm per run.</p> <p>Performance tests to be conducted in accordance with the requirements in 40 CFR 63.7520.</p> <p>Conduct tests annually, no more than 13 months after the previous performance test. If performance tests for at least 2 consecutive years show that emissions are at or below 75 percent of the emission limit and there are no changes in the operation of the boiler, performance tests may be performed every third year.</p> <p>Operating limits (see conditions D.11, D.12, D.13, and D.17) must be confirmed or reestablished during performance tests.</p> <p>Develop a site-specific test plan in accordance with 40 CFR 63.7520(a). Upon Ecology request, the Permittee shall submit the site-specific test plan for approval.</p> <p><i>60-day Notification:</i></p> <p>Notification of Intent to conduct a performance test must be provided to the Administrator 60 days before the performance test is scheduled to begin.</p> <p><i>Recordkeeping:</i></p> <p>The Permittee must keep records of all performance tests.</p>	<p>40 CFR 63.7500(a)(1) and Table 2 (Item 7b) for emission limit</p> <p>40 CFR 63.7515(a) and (b) for testing frequency</p> <p>40 CFR 63.7520 and Table 5 (Item 1) for performance testing requirements</p> <p>40 CFR 63.7540(a)(1) and Table 7 (footnote a) for operating limit confirmation/reestablishment</p> <p>40 CFR 63.7520(a) for site-specific test plan requirement</p> <p>40 CFR 63.7545(d) for performance test notification</p> <p>40 CFR 63.7555(a)(2) for recordkeeping</p>

PB10	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			<p><i>Reporting:</i></p> <p>Semi-annual compliance reporting in accordance with 40 CFR 63.7550.</p> <p>Within 60 days after the date of completing each performance test, submit the results of the performance test electronically via EPA's Compliance and Emissions Data Reporting Interface (CEDRI) in accordance with 40 CFR 63.7550(h).</p> <p>Include source test results in the monthly air report due after results received by the facility.</p>	<p>40 CFR 63.7515(f) and 63.7550 for reporting</p> <p>Order 11025, Condition 1.1f (Boiler MACT order)</p>
D.3a	PM (opacity as a surrogate)	20% except for one six-minute period per hour of not more than 27% opacity	<p>Continuous compliance indicated by maintaining scrubber recirculation flow ≥ 1553 gpm, scrubber pressure drop (dP) ≥ 6 inches H₂O, and precipitator total secondary power ≥ 11.6 kW.</p> <p>An exceedance is defined as any hour in which scrubber recirculation flow, scrubber pressure drop, or precipitator total secondary power are below established compliance values for more than six consecutive minutes.</p> <p>See Facility-wide General Requirement, Condition 27 for CMS operating requirements.</p> <p><i>Reporting:</i></p> <p>Report minimum 6-minute average scrubber recirculation flow, minimum 6-minute average scrubber pressure drop, minimum 6-minute average total secondary power, and exceedances monthly to Ecology.</p> <p>The Permittee must submit a <i>Semi-Annual Excess Emissions and Continuous Monitoring Systems Performance or Summary</i></p>	<p>40 CFR 60.42(a)(2) for basis of limit</p> <p>40 CFR 60.45(a) and 60.13(i)(1) for basis of monitoring</p>

PB10	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			<p>Report in accordance with 40 CFR 60.7(c) and 40 CFR 60.45(g), postmarked by July 30 or January 30 following the end of the respective calendar half (or on a more frequent basis as determined necessary by Ecology).</p>	
D.3b	Opacity	20% average for more than 6 consecutive minutes in any 60 minute period	<p>EPA RM 9 is the reference test method.</p> <p><i>Compliance Assurance Monitoring:</i></p> <p>The Permittee must comply with the monitoring requirements in Condition D.3a. Take corrective action immediately following an exceedance as defined in Condition D.3a. Failure to take corrective action within 24 hours is a violation.</p> <p>The Permittee shall comply with the general CAM requirements in Condition O.</p> <p>CAM reporting required on at a minimum semiannual basis.</p>	<p>WAC 173-405-040(6) for limit</p> <p>40 CFR 64.2 and 64.6 through 64.9 for respective PM CAM monitoring and reporting/recordkeeping</p>
D.4a	SO ₂	0.80 lb/MMBtu of heat input	<p>Monitor emissions using fuel sampling and analysis. Analyze fuel using ASTM D 4294 (Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry).</p> <p>For RFO: analyze fuel shipments for sulfur content. All fuel fired must be ≤0.76% sulfur by weight. Report all occasions when fuel with S content >0.76% is burned. Maintain fuel sulfur analysis records.</p> <p>For other liquid fuels: analyze fuel shipments for sulfur content and heat value. Calculate expected SO₂ emission rate. Report results exceeding the limit. Maintain fuel sulfur and heat value analysis records. Ecology may approve a % sulfur by weight</p>	<p>40 CFR 60.43(a)(1) for emission limit</p> <p>40 CFR 60.45(b)(2) for monitoring</p> <p>WAC 173-401-615(b) analytical method and compliance specifications</p>

PB10	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			requirement in lieu of heat value measurements and emission calculations based on acceptable heat value data.	
D.4b	SO ₂	1000 ppm @ 7% O ₂ , 1-hr average	Maintain records of fuel analysis showing all oil fired was ≤2% sulfur. Report all occasions when fuel with sulfur content >2% burned.	WAC 173-405-040 (9)(b) for basis of limit WAC 173-401-615(1)(b) compliance specifications
D.5	NO _x (as NO ₂)	0.30 lb/MMBtu of heat input, 3-hr average	<p><i>Monitoring:</i></p> <p>Monitor continuously using an approved CEMS that conforms to 40 CFR 60, App. F and App. B, Perf. Spec. 2. Monitor emission in accordance with 40 CFR 60.45.</p> <p>See Facility-wide General Requirement, Condition 27 for CEMS operating requirements.</p> <p><i>Reporting:</i></p> <p>Report daily maximum 3-hr averages, daily averages, and excursions monthly.</p> <p>The Permittee must submit a <i>Semi-Annual Excess Emissions and Continuous Monitoring Systems Performance or Summary Report</i> in accordance with 40 CFR 60.7(c) and 40 CFR 60.45(g), postmarked by July 30 or January 30 following the end of the respective calendar half (or on a more frequent basis as determined necessary by Ecology).</p>	<p>40 CFR 60.44(a)(2) for limit.</p> <p>40 CFR 60.45(g)(3) for averaging interval.</p> <p>40 CFR 60.45(a) and 40 CFR 60.13(d) for monitoring.</p>

PB10	Parameter	Limit (shall not exceed)	Monitoring & Reporting¹	Applicable Requirements
D.6	TRS	Temperature $\geq 1,200^{\circ}\text{F}$ and retention time ≥ 0.5 seconds when burning NCGs from NSPS emission units	Monitoring not required.	40 CFR 60.283(a)(1)(iii) for standard
D.7	O ₂	No limit – required for O ₂ correction	Monitor continuously using an approved CEMS that conforms to 40 CFR 60, App. F and App. B, Perf. Spec. 3. See Facility-wide General Requirement, Condition 27 for CEMS operating requirements.	40 CFR 60.45(a) for oxygen monitoring
D.8	Stack Height	N/A	Stack Height shall be ≥ 53 meters before production exceeds 650 tons/D unbleached pulp. The Permittee has certified stack height is ≥ 53 meters. Report if stack is shortened.	PSD-I, Condition 3
D.9	Salty Hog Fuel	N/A	Monitor hog fuel shipments. Report any salty hog fuel (hog fuel from logs transported and/or stored in salt water) burned in monthly report.	WAC 173-401-615
D.10	Urban Wood Acceptance Program	N/A	All urban wood purchased by the Permittee must meet an urban wood acceptance program included as part of the PB10 operations and maintenance manual (Condition D.23). The acceptance program must include acceptance criteria which, at a minimum, prohibits wood treated with creosote, pentachlorophenol, or copper-chrome-arsenic; municipal waste; hazardous material contaminants (asbestos, lead, mercury); lead painted items; and plastic coatings.	Order 11025, Condition 5

PB10	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			Any changes to the acceptance program must be submitted to Ecology prior to instituting the changes.	
D.11	CO	720 ppm by volume on a dry basis @ 3% O ₂ , 30-day rolling average	<p><i>Monitoring</i></p> <p>The Permittee must you must install, certify, operate, and maintain a CO CEMS and an oxygen analyzer according to the applicable procedures under Performance Specification 4, 4A, or 4B at 40 CFR Part 60, Appendix B; the site-specific monitoring plan developed according to 40 CFR 63.7505(d); and the requirements in 40 CFR 63.7540(a)(8) and 40 CFR 63.7525(a).</p> <p>The Permittee must follow the quality assurance procedures (e.g., quarterly accuracy determinations and daily calibration drift tests) of Procedure 1 of Appendix F to 40 CFR Part 60. The measurement span value of the CO CEMS must be two times the applicable CO emission limit, expressed as a concentration.</p> <p>Complete a minimum of one cycle of CO and oxygen (or CO₂) CEMS operation (sampling, analyzing, and data recording) for each successive 15-minute period. Collect CO and oxygen (or CO₂) data concurrently. Collect at least four CO and oxygen (or CO₂) CEMS data values representing the four 15-minute periods in an hour, or at least two 15-minute data values during an hour when CEMS calibration, quality assurance, or maintenance activities are being performed.</p> <p>Reduce the CO CEMS data as specified in 40 CFR 63.8(g)(2).</p> <p>Calculate one-hour arithmetic averages, corrected to 3 percent oxygen (or corrected to a CO₂ percentage determined to be</p>	<p>40 CFR 63.7500(a)(1) and Table 2 (Item 7a) for emission limit</p> <p>40 CFR 63.7525(a) for monitoring</p> <p>40 CFR 63.7540 and 63.7555(b) for recordkeeping</p> <p>40 CFR 63.7550 and Table 9 for reporting</p> <p>Order 11025, Condition 1.1e (Boiler MACT order)</p>

PB10	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			<p>equivalent to 3 percent oxygen) from each hour of CO CEMS data in parts per million CO concentration. The one-hour arithmetic averages required shall be used to calculate the 30-day rolling average emissions. Use Equation 19-19 in Section 12.4.1 of Method 19 of 40 CFR Part 60, Appendix A-7 for calculating the average CO concentration from the hourly values.</p> <p>For purposes of collecting CO data, operate the CO CEMS as specified in §63.7535(b). You must use all the data collected during all periods in calculating data averages and assessing compliance, except that you must exclude certain data as specified in §63.7535(c). Periods when CO data are unavailable may constitute monitoring deviations as specified in §63.7535(d).</p> <p>See Facility-wide General Requirement, Condition 28 for CEMS operating requirements.</p> <p><i>Recordkeeping</i></p> <p>Keep records of CO levels according to §63.7555(b).</p> <p><i>Reporting</i></p> <p>Report daily 30-day rolling average CO (ppmdv @ 3% O₂) in the monthly report. Report exceedances monthly.</p> <p>Semi-annual compliance reporting in accordance with 40 CFR 63.7550. The Permittee must submit a semi-annual compliance report and performance evaluations of CMS through CEDRI in the EPA's CDX.</p>	

PB10	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
D.12	HAP Metals and Mercury (WESP Operating Limit)	Maintain the 30-day rolling average total secondary electric power input of the electrostatic precipitator at or above the operating limits established during the performance test demonstrating compliance with the PM or Mercury emission limit	<p><i>Monitoring:</i></p> <p>The Permittee shall install sensors to measure (secondary) voltage and current to the precipitator collection plates.</p> <p>Develop a site-specific monitoring plan in accordance with 40 CFR 63.7505(d). Upon Ecology request, the Permittee shall submit the site specific monitoring plan for approval.</p> <p>Performance evaluations of the electric power monitoring system must be conducted in accordance with the monitoring plan at the time of each performance test but no less frequently than annually.</p> <p>Continuous compliance demonstrated in accordance with 40 CFR 63.7540 and Table 8 (Item 7) in the subpart.</p> <p>See Facility-wide General Requirement, Condition 28 for CMS data recovery requirements.</p> <p><i>Establishing Operating Limit:</i></p> <p>Secondary power operating limit to be established according to Table 7 (Item 1b) in the subpart. Operating limit must be confirmed or reestablished during performance tests. Minimum total secondary electric power input must be set at the higher of the minimum values established during the performance tests for HAP metals and mercury.</p> <p><i>Recordkeeping:</i></p> <p>The Permittee shall keep records of all monitoring data and calculated averages for secondary power.</p>	<p>40 CFR 63.7525(h)</p> <p>40 CFR 63.7500(a)(2) and Table 4 (Item 4b) for operating limit</p> <p>40 CFR 63.7540 and Table 8 (Item 7) for monitoring requirements</p> <p>40 CFR Part 63, Subpart DDDDD, Table 7 (Item 1b) for establishing operating limit</p> <p>40 CFR 63.7555 for recordkeeping</p> <p>40 CFR 63.7550 and Table 9 for reporting</p>

PB10	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			<p><i>Reporting:</i></p> <p>Report daily 30-day rolling average total secondary electric power input of the electrostatic precipitator in the monthly report. Semi-annual compliance reporting in accordance with 40 CFR 63.7550.</p>	
D.13	HAP Metals and Mercury (Scrubber Operating Limit)	Maintain the 30-day rolling average pressure drop at or above the lowest one-hour average pressure drop measured during the performance test demonstrating compliance with the PM or mercury emission limit	<p><i>Monitoring:</i></p> <p>Continuously monitor the scrubber pressure drop using a pressure monitoring system according to 40 CFR 63.7525(f). Demonstrate continuous compliance in accordance with 40 CFR 63.7540 and Table 8 (Item 4) of the subpart. Develop a site-specific monitoring plan in accordance with 40 CFR 63.7505(d). Upon Ecology request, the Permittee shall submit the site-specific monitoring plan for approval. See Facility-wide General Requirement, Condition 28 for CMS data recovery requirements.</p> <p><i>Establishing Operating Limit:</i></p> <p>Pressure drop to be established according to Table 7 (Item 1a) in the subpart. Operating limit must be confirmed or reestablished during performance tests. Minimum pressure drop must be set at the higher of the minimum values established during the performance test for HAP metals and mercury.</p> <p><i>Recordkeeping:</i></p>	<p>40 CFR 63.7525(f)</p> <p>40 CFR 63.7540 and Table 8 (Item 4) for monitoring requirements</p> <p>40 CFR 63.7500(a)(2) and Table 4 (Item 1) for operating limit</p> <p>40 CFR 63.7505(d) for site-specific monitoring plan</p> <p>40 CFR Part 63, Subpart DDDDD, Table 7 (Item 1) for establishing operating limit</p> <p>40 CFR 63.7555 for recordkeeping</p> <p>40 CFR 63.7550 and Table 9 for reporting</p>

PB10	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			<p>The Permittee shall keep records of all monitoring data and calculated averages for scrubber pressure drop.</p> <p><i>Reporting:</i></p> <p>Report daily 30-day rolling average pressure drop in the monthly report. Report exceedances monthly.</p> <p>Semi-annual compliance reporting in accordance with 40 CFR 63.7550.</p>	
D.14	HAP Metals and Mercury (Scrubber Operating Limit)	Maintain the 30-day rolling average liquid flow rate at or above the lowest one-hour average liquid flow rate measured during the performance test demonstrating compliance with the PM or mercury emission limit	<p><i>Monitoring:</i></p> <p>Continuously monitor the scrubber liquid flow rate using a flow monitoring system according to 40 CFR 63.7525(e).</p> <p>Demonstrate continuous compliance in accordance with 40 CFR 63.7540 and Table 8 (Item 4) of the subpart.</p> <p>Develop a site-specific monitoring plan in accordance with 40 CFR 63.7505(d). Upon Ecology request, the Permittee shall submit the site-specific monitoring plan for approval.</p> <p>See Facility-wide General Requirement, Condition 28 for CMS data recovery requirements.</p> <p><i>Establishing Operating Limit:</i></p> <p>Scrubber liquid flow rate to be established according to Table 7 (Item 1) in the subpart. Operating limit must be confirmed or reestablished during performance tests. Minimum liquid flow rate must be set at the higher of the minimum values established during the performance tests for HAP metals and mercury.</p>	<p>40 CFR 63.7525(e)</p> <p>40 CFR 63.7540 and Table 8 (Item 4) for monitoring requirements</p> <p>40 CFR 63.7500(a)(2) and Table 4 (Item 1) for operating limit</p> <p>40 CFR 63.7505(d) for site-specific monitoring plan</p> <p>40 CFR Part 63, Subpart DDDDD, Table 7 (Item 1) for establishing operating limit</p> <p>40 CFR 63.7555 for recordkeeping</p>

PB10	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			<p><i>Recordkeeping:</i></p> <p>The Permittee shall keep records of all monitoring data and calculated averages for scrubber liquid flow rate.</p> <p><i>Reporting:</i></p> <p>Report daily 30-day rolling average scrubber liquid flow rate in the monthly report. Report exceedances monthly.</p> <p>Semi-annual compliance reporting in accordance with 40 CFR 63.7550.</p>	<p>40 CFR 63.7550 and Table 9 for reporting</p>
D.15	HCl	<p>2.2 E-02 lb per MMBtu of heat input</p> <p>(Boiler MACT Emission Limit)</p>	<p><i>Performance Testing:</i></p> <p>Reference Test Method is EPA RM 26 or 26A.</p> <p>Performance tests to be conducted in accordance with the requirements in 40 CFR 63.7520.</p> <p>Conduct tests annually, no more than 13 months after the previous performance test. If performance tests for at least 2 consecutive years show that emissions are at or below 75 percent of the emission limit and there are no changes in the operation of the boiler, performance tests may be performed every third year.</p> <p>Develop site-specific test and fuel monitoring plans in accordance with 40 CFR 63.7520(a) and 40 CFR 63.7521(b). Upon Ecology request, the Permittee shall submit the test and monitoring plan for approval.</p> <p><i>60-day Notification:</i></p>	<p>40 CFR 63.7500(a)(1) and Table 2 (Item 1a) for emission limit</p> <p>40 CFR 63.7515(a) and (b) for testing frequency</p> <p>40 CFR 63.7545(d) for performance test notification</p> <p>40 CFR 63.7520 and Table 5 (Item 3) for performance testing requirements</p> <p>40 CFR 63.7520(a) for site-specific test plan requirement</p>

PB10	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			<p>Notification of Intent to conduct a performance test must be provided to the Administrator 60 days before the performance test is scheduled to begin.</p> <p><i>Recordkeeping:</i> The Permittee must keep records of all performance tests.</p> <p><i>Reporting:</i> Semi-annual compliance reporting in accordance with 40 CFR 63.7550.</p> <p>Within 60 days after the date of completing each performance test, submit the results of the performance test electronically via EPA's Compliance and Emissions Data Reporting Interface (CEDRI) in accordance with 40 CFR 63.7550(h).</p> <p>Include source test results in the monthly air report due after results received by the facility.</p>	<p>40 CFR 63.7521(b) for site-specific fuel monitoring plan</p> <p>40 CFR 63.7555 for recordkeeping</p> <p>40 CFR 63.7515(f) and 63.7550 for reporting</p> <p>Order 11025, Condition 1.1c (Boiler MACT Order)</p>
D.16	Mercury	5.7 E-06 lb per MMBtu of heat input (Boiler MACT Emission Limit)	<p><i>Performance Testing:</i> Reference Test Method is EPA RM 29, 30A, 30B, or alternate method listed in 40 CFR Part 63, Subpart DDDDD Table 5, Item 4e.</p> <p>Performance tests to be conducted in accordance with the requirements in 40 CFR 63.7520.</p> <p>Conduct tests annually, no more than 13 months after the previous performance test. If performance tests for at least 2 consecutive years show that emissions are at or below 75 percent of the emission limit and there are no changes in the</p>	<p>40 CFR 63.7500(a)(1) and Table 2 (Item 1b) for emission limit</p> <p>40 CFR 63.7515(a) and (b) for testing frequency</p> <p>40 CFR 63.7545(d) for performance test notification</p> <p>40 CFR 63.7520 and Table 5 (Item 4) for</p>

PB10	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			<p>operation of the boiler, performance tests may be performed every third year.</p> <p>Develop site-specific test and fuel monitoring plans.</p> <p><i>60-day Notification:</i></p> <p>Notification of Intent to conduct a performance test must be provided to the Administrator 60 days before the performance test is scheduled to begin.</p> <p><i>Recordkeeping:</i></p> <p>The Permittee must keep records of all performance tests.</p> <p><i>Reporting:</i></p> <p>Semi-annual compliance reporting in accordance with 40 CFR 63.7550.</p> <p>Within 60 days after the date of completing each performance test, submit the results of the performance test electronically via EPA's Compliance and Emissions Data Reporting Interface (CEDRI) in accordance with 40 CFR 63.7550(h).</p> <p>Include source test results in the monthly air report due after results received by the facility.</p>	<p>performance testing requirements</p> <p>40 CFR 63.7520(a) for site-specific test plan requirement</p> <p>40 CFR 63.7521(b) for site-specific fuel monitoring plan</p> <p>40 CFR 63.7555 for recordkeeping</p> <p>40 CFR 63.7515(f) and 63.7550 for reporting</p> <p>Order 11025, Condition 1.1d (Boiler MACT Order)</p>

PB10	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
D.17	Mercury and HCl	Equal to or lower fuel input of chlorine and mercury than the maximum values calculated during the most recent performance test	<p>Keep records of monthly fuel use, including type(s) of fuel and amount(s) used.</p> <p>Maintain a copy of all calculations and supporting documentation for maximum chlorine and mercury fuel input.</p> <p>Any plans to burn a new fuel or new mixture of fuels require that the maximum mercury and HCl input be recalculated.</p> <p>Compliance reporting in accordance with 40 CFR 63.7550.</p>	<p>40 CFR 63.7540(a)(2)(ii) for continuous compliance demonstration</p> <p>40 CFR 63.7555(d) for recordkeeping</p> <p>40 CFR 63.7540(a)(4) and (6) for new fuel recalculation</p> <p>40 CFR 63.7550 for reporting</p>
D.18	Any pollutant for which compliance is demonstrated by a Boiler MACT performance test (Operating Limit)	Maintain 30-day rolling average operating load \leq 110% of the highest hourly average operating load recorded during the performance test	<p>Collect operating load data or steam generation data every 15 minutes. Reduce the data to 30-day rolling averages.</p> <p>See Facility-wide General Requirement, Condition 28 for CMS data recovery requirements.</p> <p>Report daily 30-day rolling average operating load in the monthly report. Report exceedances monthly.</p> <p>Compliance reporting in accordance with 40 CFR 63.7550.</p>	<p>40 CFR 63.7500(a)(2) and Table 4 (Item 7) for operating limit</p> <p>40 CFR 63.7520 and Table 7 (Item 5) for establishing operating limit; Table 7 (footnote a) for operating limit confirmation/reestablishment</p> <p>40 CFR 63.7540 and Table 8 (Item 10) for boiler operating load data collection requirements</p>

PB10	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
				40 CFR 63.7550 for reporting
D.19	Work Practice Standard	Tune-up	<p>For a boiler or process heater with a continuous oxygen trim system that maintains an optimum air to fuel ratio, the boiler/process heater tune-up must be performed as specified in 40 CFR 63.7540(a)(12) and Table 3.</p> <p>If the boiler/process heater removes the continuous oxygen trim system, the boiler/process heater tune-up must be performed annually as specified in 40 CFR 63.7540(a)(10) and Table 3.</p> <p>Report in accordance with 40 CFR 63.7550(c)(1).</p>	<p>40 CFR 63.7540(a)(12) and Table 3 (Item 1) for once every five year tune-ups (continuous oxygen trim system)</p> <p>40 CFR 63.7540(a)(10) and Table 3 (Item 3) for annual tune-ups</p> <p>40 CFR 63.7550(c)(1) for reporting</p>
D.20	Startup (Work Practice Standard)	The Permittee must comply with all applicable emission limits at all times except for startup periods conforming with this work practice standard	<p>All CMS must be operated during startup.</p> <p>The Permittee must use one or a combination of clean fuels as listed in 40 CFR Part 63, Subpart DDDDD, Table 3 (Item 5.b).</p> <p>Once firing non-clean fuels during startup, emissions must be vented to the main stack(s) and all emission control devices must be engaged.</p> <p>Monitoring data must be collected during startup, as specified in 40 CFR 63.7535(b).</p> <p>Records must be kept during periods of startup as specified in 40 CFR 63.7555.</p> <p>Reporting in accordance with 40 CFR 63.7550.</p>	<p>40 CFR 63.7500(f) and Table 3 (Item 5)</p> <p>40 CFR 63.7535(b) for monitoring requirements</p> <p>40 CFR 63.7555(d)(9) and (10) for recordkeeping</p> <p>40 CFR 63.7550 for reporting</p> <p>40 CFR 63.7575 for definition of startup</p>

PB10	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
D.21	Shutdown (Work Practice Standard)	The Permittee must comply with all applicable emission limits at all times except for shutdown periods conforming with this work practice standard.	<p>All CMS must be operated during shutdown.</p> <p>While firing non-clean fuels during shutdown, emissions must be vented to the main stack(s) and all emission control devices must be engaged.</p> <p>Monitoring data must be collected during shutdown, as specified in 40 CFR 63.7535(b).</p> <p>Records must be kept during periods of shutdown as specified in 40 CFR 63.7555.</p> <p>Reporting in accordance with 40 CFR 63.7550.</p>	<p>40 CFR 63.7500(f) and Table 3 (Item 6)</p> <p>40 CFR 63.7535(b) for monitoring requirements</p> <p>40 CFR 63.7555(d)(9) and (10) for recordkeeping</p> <p>40 CFR 63.7550 for reporting</p> <p>40 CFR 63.7575 for definition of startup</p>
D.22	Startup/Shutdown Recordkeeping	N/A	<p>The Permittee must maintain startup/shutdown records regarding the following:</p> <ol style="list-style-type: none"> 1) The calendar date, time, occurrence and duration of each startup and shutdown; 2) The type(s) and amount(s) of fuels used during each startup and shutdown. 	40 CFR 63.7555
D.23	Operations and Maintenance Manual	N/A	The Permittee must follow and maintain an operations and maintenance manual for PB10 and associated monitoring and air pollution control equipment. A copy of the manual must be available to Ecology during inspections and upon request.	Order 11025, Condition 7

PB10	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
D.24	Operations and Maintenance	N/A	<p>At all times, the Permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.</p> <p><i>General Recordkeeping:</i></p> <p>The Permittee must maintain records of:</p> <ol style="list-style-type: none"> 1) The occurrence and duration of each malfunction of the boiler or process heater, or of the associated air pollution control and monitoring equipment; and 2) Actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.7500(a)(3), including corrective actions to restore the malfunctioning boiler or process heater, air pollution control, or monitoring equipment to its normal or usual manner of operation. 	<p>40 CFR 63.7500(a)(3) 40 CFR 63.7555(d)(6) and (7) for recordkeeping</p>
D.25	Monitoring Data Collection	N/A	<p>The Permittee shall operate the monitoring system and collect data at all required intervals at all times that the boiler is operating and compliance is required, except for periods of monitoring system malfunctions or out of control periods (see 40 CFR 63.8(c)(7)), and required monitoring system quality assurance or control activities, including, as applicable,</p>	<p>40 CFR 63.7535</p>

PB10	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			calibration checks, required zero and span adjustments, and scheduled CMS maintenance as defined in your site-specific monitoring plan. A monitoring system malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring system failures that are caused in part by poor maintenance or careless operation are not malfunctions. You are required to complete monitoring system repairs in response to monitoring system malfunctions or out-of-control periods and to return the monitoring system to operation as expeditiously as practicable.	

E. PACKAGE BOILER (PKB)

The source shall also comply with the General Requirements of 40 CFR Part 60, including:

- 40 CFR 60.7(b) & (f) concerning recordkeeping,
- 40 CFR 60.7(c), (d), & (e) concerning reporting,
- 40 CFR 60.11(d) concerning operation and maintenance,
- 40 CFR 60.12 concerning concealment,
- 40 CFR 60.13 concerning monitoring,
- 40 CFR 60.19 concerning notification and reporting.

PKB	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
E.1a	Particulate (PM)	0.01 lb/mmBtu, 30-day rolling average	<i>Performance Testing:</i> Initial compliance determined in accordance with 40 CFR Part 60, Appendix A, Reference Method 5, or an approved alternative	PSD 96-01A, Amendment 1, Condition III.B for limit

PKB	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			method; if the initial test is under the limit, no further testing is required. <i>Monitoring:</i> Continuous compliance is determined through burning only natural gas and good combustion controls.	PSD 96-01A, Amendment 1, Condition IV.B for monitoring
E.1b	PM	0.1 gr/dscf @ 7% O ₂ , 1-hr average	Same as previous limit.	WAC 173-405-040(5)(c)
E.1c	PM	10 tpy, calendar year total	Report calendar year total annually.	PSD 96-01A, Amendment 1, Condition III.B
E.2a	Opacity	15% averaged over 6 consecutive minutes	Monitor continuously using a COMS that conforms to 40 CFR Part 60, App. F and App. B, Perf. Spec. 1. Compliance may also be determined using EPA RM 9. Report excursions monthly. See Facility-wide General Requirement, Condition 26 for CEMS operating requirements. Report exceedances and daily maximum 6-minute average opacities in the monthly report.	PSD 96-01A, Amendment 1, Condition VI.C for monitoring Condition VII.A.3 for reporting
E.2b	Opacity	Average 20% opacity for more than 6 consecutive minutes in any 60 minute period	EPA RM 9 is the reference test method. Continuous monitoring same as above. The alternative opacity standards in WAC 173-400-040(2)(a) apply for soot blowing and grate cleaning activities.	WAC 173-405-040(6) for limit

PKB	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
E.3a	SO ₂	1000 ppm @ 7% O ₂ , 1-hr average	<p><i>Performance Testing:</i></p> <p>Sample once every five years/annually/monthly⁴ using EPA RM 6, 6a, 6b, or 6c. See Facility-wide General Requirement, Condition 37 for notification requirements.</p> <p><i>Reporting:</i></p> <p>Include source test results in the monthly air report due after results received by the facility. Report excursions from the identified good combustion practices in the monthly report.</p> <p>See Facility-wide General Requirement, Condition 38 for source test report requirements.</p>	<p>Order DE 97AQ-I030, Second Revision, Condition 1.a for performance testing</p> <p>WAC 173-405-040(9)(b)</p>
E3.b	SO ₂	Only natural gas, as defined in 40 CFR 72.2 may be used as fuel	<p>Operate the boiler in accordance with the good combustion practices identified in the Operations and Maintenance Manual (Condition E.11).</p> <p>The Permittee must obtain and maintain fuel receipts (such as a current, valid purchase contract, tariff sheet, or transportation contract) from the supplier of the natural gas that will be combusted in the package boiler that certifies that the gaseous fuel meets the definition of natural gas as defined in 40 CFR 60.41b. Compliance shall be demonstrated by certifying that only natural gas was combusted in the package boiler during that month in the monthly report submitted.</p> <p><i>Reporting:</i></p> <p>Report excursions from the identified good combustion practices in the monthly report.</p>	<p>Order DE 97AQ-I030, Second Revision, Condition 1.a and 2</p> <p>PSD 96-01A, Amendment 1, Condition V.C</p>

PKB	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
E.4a	NO _x (as NO ₂)	0.2 lb/MMBtu, 30-day rolling average	<p><i>Performance Testing:</i> Initial compliance determined using EPA Method 7E.</p> <p><i>Monitoring:</i> Continuous compliance is determined by a CEMS for NO_x and an oxygen meter. The concentration determined by the CEMS (ppm) shall be used to determine the emission rate (lb/MMBtu). The conversion of measured concentration to emission rate in lb/MMBtu shall be by using the formula found in 40 CFR Part 60, Appendix A, Method 19, Section 2.1.</p> <p>See Facility-wide General Requirement, Condition 26 for CEMS operating requirements.</p> <p><i>Reporting:</i> For each steam generating day, submit a report within 15 days of the end of each calendar month which includes:</p> <ol style="list-style-type: none"> 1) Calendar date; 2) Average hourly NO_x emission rate in lb/MMBtu; 3) 30-day rolling average NO_x emission rate in lb/MMBtu; 4) Identification of each day the 30-day rolling average is in excess of the NO_x standard, including reasons for the excess and description of the corrective action taken; 5) Identification of any steam generating days for which NO_x data were not obtained, including reasons for not obtaining sufficient data and description of corrective actions taken; 	<p>PSD 96-01A, Amendment 1, Condition III.A and 40 CFR 60.44b for limit</p> <p>PSD 96-01A, Amendment 1, Condition V.D for source testing</p> <p>PSD 96-01A, Amendment 1, Condition VI.E for monitoring</p> <p>PSD 96-01A, Amendment 1, Condition VII.A for recordkeeping and reporting</p>

PKB	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			<p>6) Identification of times emission data are excluded from the calculated average emission rate and the reasons for excluding the data;</p> <p>7) Identification of the “F” factor used for calculations, the method of determining the factor, and the type of fuel combusted.</p>	
E.4b	NO _x (as NO ₂)	0.2 lb/MMBtu, 30-day rolling average	<p><i>Monitoring:</i></p> <p>Monitor continuously using an approved CEMS that conforms to 40 CFR Part 60, App. F and App. B, Perf. Spec. 2 and in accordance with 40 CFR 60.48b.</p> <p>See Facility-wide General Requirement, Condition 27 for CEMS operating requirements.</p> <p><i>Recordkeeping:</i></p> <p>The Permittee must maintain records of the following information for each steam generating day:</p> <ol style="list-style-type: none"> 1) Calendar date; 2) The average hourly NO_x emission rates (expressed as NO₂)(ng/J or lb/MMBtu heat input) measured or predicted; 3) The 30-day average NO_x emission rates (ng/J or lb/MMBtu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 steam generating unit days; 4) Identification of the steam generating unit operating days when the calculated 30-day average NO_x emission rates 	<p>40 CFR 60.44b(a) for limit</p> <p>40 CFR 60.48b for monitoring</p> <p>40 CFR 60.49(b)(i) and 40 CFR 60.7(c) for reporting</p>

PKB	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			<p>are in excess of the NO_x emission standard, with the reasons for such excess emissions as well as a description of corrective actions taken;</p> <p>5) Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken;</p> <p>6) Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data;</p> <p>7) Identification of “F” factor used for calculations, method of determination, and type of fuel combusted;</p> <p>8) Identification of the times when the pollutant concentration exceeded full span of the CEMS;</p> <p>9) Description of any modification to the CEMS that could affect the ability of the CEMS to comply with PS-2 or 3; and</p> <p>10) Results of daily CEMS drift test and quarterly accuracy assessments.</p> <p><i>Reporting:</i></p> <p>The Permittee must submit a <i>Semi-Annual Excess Emissions and Continuous Monitoring Systems Performance or Summary Report</i> in accordance with 40 CFR 60.7(c), postmarked by the 30th day following the end of each six-month period (or on a more frequent basis in accordance with the criteria in 40 CFR 60.7(c)).</p>	

PKB	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
E.4c	NO _x	50 tpy, calendar year total	Report monthly the daily and accumulated mass per calendar year of NO _x .	PSD 96-01A, Amendment 1, Condition III.A for limit PSD 96-01A, Amendment 1, Condition VII.A for reporting
E.5	O ₂	N/A - No limit	Monitor continuously using an approved CEMS that conforms to 40 CFR Part 60, App. F and App. B, Perf. Spec. 3. See Facility-wide General Requirement, Condition 26 for CEMS operating requirements.	PSD 96-01A, Amendment 1, Conditions VI.E
E.6	Fuel Consumption	497,250 MMBtu/year (5,664 MMBtu/day)	Fuel shall be natural gas. Reprocessed fuel oil (RFO) shall not be used as fuel for the Package Boiler. The maximum amount of fuel burned in the boiler shall not exceed 497,250 MMBtu/year and 5,664 MMBtu/day. <i>Monitoring:</i> Monitor in standard cubic feet/hr and MMBtu/hr using a meter capable of measuring the flow rate with an accuracy of +/- 0.5%. The meter shall be calibrated using the method and frequency specified by the manufacturer. <i>Reporting:</i> Report monthly the amount of fuel burned daily in standard cubic feet and MMBtu/day, the total amount of fuel burned during the	PSD 96-01A, Amendment 1, Condition V.A Order DE 97AQ-I030, Second Revision, Condition 1.d for fuel consumption limit, monitoring, and reporting

PKB	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
			month in standard cubic feet and MMBtu/month, and the cumulative total of fuel burned during the previous twelve months in standard cubic feet and MMBtu/year.	
E.7a	CO	0.0359 lb/MMBtu, 1-hr average	<p><i>Performance Testing:</i></p> <p>Sample once every five years/annually/monthly⁴ using EPA RM 10. See Facility-wide General Requirement, Condition 37 for notification requirements.</p> <p><i>Monitoring:</i></p> <p>Operate the boiler in accordance with the good combustion practices identified in the Operations and Maintenance Manual (Condition E.11).</p> <p><i>Reporting:</i></p> <p>Include source test results in the monthly air report due after results received by the facility. Report excursions from the identified good combustion practices in the monthly report.</p> <p>See Facility-wide General Requirement, Condition 38 for source test report requirements.</p>	Order DE 97AQ-I030, Second Revision, Condition 1.b
E.7b	CO	8.9 tpy	<p>Report annually. Calculate emissions in tons per year using the following equation:</p> <p>Tons/year = (measured concentration in ppm_{dv} x source test air flow rate in dscfm x molar mass in lb per lbmol x 385 scf per lbmol x time adjustment)/2000 lbs</p>	Order DE 97AQ-I030, Second Revision, Condition 1.b

PKB	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
E.8a	VOC (as carbon)	0.002 lb/MMBtu, 1-hr average	<p><i>Performance Testing:</i></p> <p>Sample once every five years/annually/monthly⁴ using EPA RM 25A. See Facility-wide General Requirement, Condition 37 for notification requirements.</p> <p><i>Monitoring:</i></p> <p>Operate the boiler in accordance with the good combustion practices identified in the Operations and Maintenance Manual (Condition E.11).</p> <p><i>Reporting:</i></p> <p>Include source test results in the monthly air report due after results received by the facility. Report excursions from the identified good combustion practices in the monthly report.</p> <p>See Facility-wide General Requirement, Condition 38 for source test report requirements.</p>	Order DE 97AQ-I030, Second Revision, Condition 1.c
E.8b	VOC (as carbon)	0.50 tpy	<p>Report annually. Calculate emissions in tons per year using the following equation:</p> <p>Tons/year = (measured concentration in ppmdv x source test air flow rate in dscfm x molar mass in lb per lbmol x 385 scf per lbmol x time adjustment)/2000 lbs</p>	Order DE 97AQ-I030, Second Revision, Condition 1.c

PKB	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
E.9	Work Practice Standard	Boiler Tune-up	<p>The Permittee must perform boiler tune-ups every five years as specified in 40 CFR 63.7540(a)(12) and Table 3.</p> <p>If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.</p> <p>Five-year compliance report required in accordance with 40 CFR 63.7550(b) and (c)(1).</p>	<p>40 CFR 63.7510(j) for initial compliance requirements</p> <p>40 CFR 63.7540(a)(12) and Table 3 (Item 1) for tune-ups</p> <p>40 CFR 63.7550(b) and (c)(1) for reporting</p>
E.10	Operations and Maintenance Manual	N/A	<p>Within 90 days of initial start-up of the boiler on natural gas, the Permittee shall identify boiler operational parameters and practices that have been described as “good combustion practices.” Such identification shall be included in an operation and maintenance (O&M) manual for the boiler. The O&M manual shall also include a description of records that will be maintained to insure the continuous application of “good combustion practice.”</p> <p>The Package Boiler must be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times. The operation and maintenance manual must be followed. A copy of the manual must be available to Ecology during inspections and upon request.</p>	<p>PSD 96-01A, Amendment 1, Condition VI.D</p> <p>Order DE 97AQ-I030, Second Revision, Condition 4</p>

PKB	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
E.11	PSD CEMS Reporting	N/A	<p>A quarterly report, within 30 days after the end of each calendar quarter, shall be submitted to Ecology which includes the following CEMS data:</p> <ul style="list-style-type: none"> a) Days for which data was not collected; b) Reasons for which data was not collected; c) Identification of times when the pollutant concentration exceeds span of the CEMS; d) Description of any modifications to the CEMS that could affect the ability of the system to comply with Performance Specifications 2 or 3; e) Results of any CEMS drift tests. 	PSD 96-01A, Amendment 1, Condition VII.A.4

F. DIGESTERS, MULTI-EFFECT EVAPORATORS, WASHERS

The MEE E-set, C-washer, and Digesters #10, 11, and 12 are NSPS applicable units (40 CFR Part 60, Subpart BB). These sources shall comply with the general requirements of 40 CFR Part 60, including:

- 40 CFR 60.7(b) & (f) concerning recordkeeping,
- 40 CFR 60.7(c), (d), & (e) concerning reporting,
- 40 CFR 60.11(d) concerning operation and maintenance,
- 40 CFR 60.12 concerning concealment,
- 40 CFR 60.13 concerning monitoring,
- 40 CFR 60.19 concerning notification and reporting.

Digesters, MEE, and Washers	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
F.1	TRS	5 ppm _{dv} @ 10 % O ₂ , unless	The Permittee must combust gases from NSPS Subpart BB applicable units in the Lime Kiln or Power Boiler 10. Gases must	40 CFR 60.283(a)(1) for emission limit

Digesters, MEE, and Washers	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
		combusted in the lime kiln or Power Boiler 10	be subjected to a minimum temperature of 1200 °F for at least 0.5 seconds. <i>Monitoring:</i> Compliance with Condition C.6a or D.6 shall be used to demonstrate compliance with this requirement.	40 CFR 60.284(d) for reporting

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

Digesters and MEE	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirements
F.2	TRS	Treat noncondensable gases to reduce TRS emissions equal to reduction achieved by thermal oxidation in a lime kiln; install a backup treatment system to ensure continual treatment.	Treat noncondensable gases from the digesters and evaporators to reduce TRS emissions equal to reduction achieved by thermal oxidation in a lime kiln; install a backup treatment system to ensure continual treatment. To provide continual treatment: <ul style="list-style-type: none"> - The NCG collection and treatment system shall be properly operated and maintained at all times; - Venting shall be minimized; and - Venting necessary for safe/proper system operation and maintenance shall be less than 10 hours per month. Report venting duration and cause in the monthly air report.	WAC 173-405-040(4) for treatment requirement Order 2892-05AQ, Modification 1 for continuous treatment WAC 173-401-615(3) for reporting

G. LOW VOLUME HIGH CONCENTRATION (LVHC) SYSTEM

The LVHC system includes: batch digester systems, “D” and “E” multi effect evaporator systems, batch digester blow tank, foul condensate collection tank, blow heat condenser system, and turpentine collection system, including the turpentine after condenser.

LVHC	Parameter	Limit, Monitoring, Reporting, Recordkeeping	Applicable Requirements
G.1	HAPs: Collection and Treatment	LVHC non-condensable gas source group emissions shall be enclosed and vented into a closed-vent system and routed to the Lime Kiln and/or Power Boiler #10 for destruction. Introduce LVHC gases with the primary fuel or into flame zone of Power Boiler #10 or the Lime Kiln.	40 CFR 63.443(c) 40 CFR 63.443(d)
G.2	HAPs: Enclosures	Each enclosure shall maintain negative pressure at each enclosure or hood opening as demonstrated by the procedures in 40 CFR 63.457(e). Each enclosure or hood opening that was closed during the initial performance test shall be maintained in the closed position at all times except when necessary to open for sampling, inspection, maintenance, or repairs. <i>Monthly Inspections:</i> For each enclosure opening, a visual inspection of the closure mechanism shall be performed at least once every 30 days to ensure the opening is maintained in the closed position and sealed. For this condition, 30 days shall be interpreted to mean: at least once per calendar month with no two consecutive inspections occurring within 14 days. <i>Annual Inspections:</i> Demonstrate annually that each enclosure opening is maintained at negative pressure as specified in 40 CFR 63.457(e).	40 CFR 63.450(a) and (b) 40 CFR 63.453(k)(1) for monthly inspections 40 CFR 63.453(k)(4) for annual inspections
G.3	HAPs:	Each component of the closed-vent system used to control LVHC non-condensable gas source group emission that is operated at positive pressure and located prior to a control device shall be designed for and operated with no detectable leaks as indicated by an	40 CFR 63.450(c) 40 CFR 63.453(k)(2) for

LVHC	Parameter	Limit, Monitoring, Reporting, Recordkeeping	Applicable Requirements
	Closed-vent system	<p>instrument reading of less than 500 ppmv above background, as measured by 40 CFR Part 60, Appendix A, Method 21.</p> <p><i>Monthly Inspections:</i></p> <p>Each closed vent system (reasonably accessible ductwork, piping, enclosures, and connections to covers in the collection system for the LVHC non-condensable gas source group) shall be visually inspected for visible defects every 30 day or as requested by Ecology. For this condition, 30 days shall be interpreted to mean: at least once per calendar month with no two consecutive inspections occurring within 14 days.</p> <p><i>Annual Inspections:</i></p> <p>Measure annually components of closed-vent systems under positive pressure for detectable leaks as specified in 40 CFR 63.457(d).</p>	<p>monthly inspections</p> <p>40 CFR 63.453(k)(3) for annual inspections</p>
G.4	HAPs: Collection and Treatment	<p>Each bypass line in the closed-vent system that could divert vent streams containing HAPs to the atmosphere without meeting the emission limitations in 40 CFR 63.443 shall comply with either of the following requirements:</p> <p>(1) On each bypass line, the owner or operator shall install, calibrate, maintain, and operate according to the manufacturer's specifications a flow indicator that is capable of taking periodic readings as frequently as specified in §63.454(e). The flow indicator shall be installed in the bypass line in such a way as to indicate flow in the bypass line; or</p> <p>(2) For bypass line valves that are not computer controlled, the owner or operator shall maintain the bypass line valve in the closed position with a car seal or a seal placed on the valve or closure mechanism in such a way that valve or closure mechanism cannot be opened without breaking the seal.</p> <p><i>Monthly Inspections:</i></p>	<p>40 CFR 63.450(d)</p> <p>40 CFR 63.453(k)(5) for monthly inspections</p>

LVHC	Parameter	Limit, Monitoring, Reporting, Recordkeeping	Applicable Requirements
		<p>The valve or closure mechanisms specified in (2) above shall be inspected at least once every 30 days to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.</p>	
G.5	<p>HAPs: Inspection Corrective Action</p>	<p>If an inspection of the LVHC non-condensable gas collection system identifies visible defects, or if an instrument reading of 500 ppmv or greater above background is measured by 40 CFR Part 60, Appendix A, Method 21 in accordance with the procedures in 40 CFR 63.457(d), or if enclosure openings are not maintained at negative pressure, take the following corrective actions as soon as practicable.</p> <p>Make first effort repair to correct the closed-vent system as soon as practicable but no later than 5 calendar days after the problem is identified.</p> <p>Complete the repair or corrective action no later than 15 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 Permittee determines that the emissions resulting from immediate repair would be greater than the emission likely to result from delay of repair. Repair of such equipment shall be completed by the end of the next process shutdown.</p>	<p>40 CFR 63.453(k)(6) and 40 CFR 63.457(d)</p>
G.6	<p>HAPs: Recordkeeping</p>	<p>For each applicable enclosure opening, closed vent system, and closed collection system, prepare and maintain a site-specific inspection plan, including a drawing or schematic of the components of applicable affected equipment and shall record the following information for each inspection:</p> <ol style="list-style-type: none"> (1) Date of inspection; (2) Equipment type and identification; (3) Results of negative pressure tests for enclosures; (4) Results of leak detection tests; (5) The nature of the defect or leak and the method of detection; 	<p>40 CFR 63.454(b)</p>

LVHC	Parameter	Limit, Monitoring, Reporting, Recordkeeping	Applicable Requirements
		(6) The date the defect or leak was detected and the date of each attempt to repair the defect or leak; (7) Repair methods applied in each attempt to repair the defect or leak; (8) Reason for the delay if the defect or leak is not repaired within 15 days; (9) Expected date of successful repair of the defect or leak if the repair is not completed within 15 days; (10) Date of successful repair of the defect or leak; (11) Position and duration of opening of bypass line valves and the condition of any valve seals; and (12) Duration of the use of manual or computer-controlled bypass valves.	
G.7	HAPs: Excess Emissions	Records shall be maintained for all periods of excess emissions. Periods of excess emissions from the LVHC non-condensable gas source group are not violations of Condition G.1 and 40 CFR 63.443(c) and (d) provided that the time of excess emissions from the LVHC system divided by the total process operating time in a semi-annual reporting period does not exceed one (1) percent.	40 CFR 63.443(e)(1)

H. HIGH VOLUME LOW CONCENTRATION (HVLC) SYSTEM

Applies to to following systems: C-side washers and filtrate tanks.

The Permittee submitted information to satisfy Clean Condensate Alternative (CCA) criteria in 40 CFR 63.447 which allows use of the CAA to meet HVLC collection and treatment requirements for some HVLC emission units. The B-side washers emissions are not collected and treated as part of the HVLC system; the Permittee has chosen to alternatively comply with the CCA. See Condition I for condensate requirements.

HVLC	Parameter	Limit, Monitoring, Reporting, Recordkeeping	Applicable Requirements
H.1	HAPs: Collection and Treatment	<p>HVLC non-condensable gas source group emissions shall be enclosed and vented into a closed-vent system and routed to the Lime Kiln for destruction.</p> <p>Introduce HVLC gases with the primary fuel or into flame zone of the Lime Kiln.</p>	<p>40 CFR 63.443(c)</p> <p>40 CFR 63.443(d)</p>
H.2	HAPs: Enclosures	<p>The HVLC system shall maintain negative pressure at each enclosure or hood opening as demonstrated by the procedures specified in 40 CFR 63.457(e). Each enclosure or hood opening closed during the initial performance test specified in 40 CFR 63.457(a) shall be maintained in the same closed and sealed position as during the performance test at all times except when necessary to use the opening for sampling, inspection, maintenance, or repairs.</p> <p><i>Monthly Inspections:</i></p> <p>For each enclosure opening, a visual inspection of the closure mechanism shall be performed at least once every 30 days to ensure the opening is maintained in the closed position and sealed.</p> <p>For this condition, 30 days shall be interpreted to mean: at least once per calendar month with no two consecutive inspections occurring within 14 days.</p> <p><i>Annual Inspections:</i></p> <p>Demonstrate annually that each enclosure opening is maintained at negative pressure as specified in 40 CFR Part 63.457(e).</p>	<p>40 CFR 63.450(a) and (b)</p> <p>40 CFR 63.453(k)(1) for monthly inspections</p> <p>40 CFR 63.453(k)(4) for annual inspections</p>
H.3	HAPs: Closed-vent system	<p>Each component of the closed-vent system used to control HVLC non-condensable gas source group emission that is operated at positive pressure and located prior to a control device shall be designed for and operated with no detectable leaks as indicated by an instrument reading of less than 500 ppmv above background, as measured by 40 CFR Part 60, Appendix A, Method 21.</p> <p><i>Monthly Inspections:</i></p>	<p>40 CFR 63.450(a) and (c)</p> <p>40 CFR 63.453(k)(2) for monthly inspections</p>

HVLC	Parameter	Limit, Monitoring, Reporting, Recordkeeping	Applicable Requirements
		<p>Each closed vent system (reasonably accessible ductwork, piping, enclosures, and connections to covers in the collection system for the HVLC system) shall be visually inspected for visible evidence of defects every 30 days or as requested by Ecology.</p> <p>For this condition, 30 days shall be interpreted to mean: at least once per calendar month with no two consecutive inspections occurring within 14 days.</p> <p><i>Annual Inspections:</i></p> <p>Measure annually components of closed-vent systems under positive pressure for detectable leaks as specified in 40 CFR 63.457(d).</p>	<p>40 CFR 63.453(k)(3) for annual inspections</p>
H.4	HAPs: Collection and Treatment	<p>Each bypass line in the closed-vent system that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations in §§63.443 shall comply with either of the following requirements:</p> <p>(1) On each bypass line, the Permittee shall install, calibrate, maintain, and operate according to the manufacturer's specifications a flow indicator that is capable of taking periodic readings as frequently as specified in 40 CFR 63.454(e). The flow indicator shall be installed in the bypass line in such a way as to indicate flow in the bypass line (note: monitoring bypass valve position is a satisfactory flow indicator); or</p> <p>(2) For bypass line valves that are not computer controlled, the Permittee shall maintain the bypass line valve in the closed position with a car seal or a seal placed on the valve or closure mechanism in such a way that valve or closure mechanism cannot be opened without breaking the seal</p> <p><i>Monthly Inspections:</i></p> <p>The valve or closure mechanisms specified in (2) above shall be inspected at least once every 30 days to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.</p>	<p>40 CFR 63.450(d) 40 CFR 63.453(k)(5) for monthly inspections</p>

HVLC	Parameter	Limit, Monitoring, Reporting, Recordkeeping	Applicable Requirements
H.5	HAPs: Inspection Corrective Action	<p>If an inspection of the HVLC system identifies visible defects, or if an instrument reading of 500 ppmv or greater above background is measured by 40 CFR Part 60, Appendix A, Method 21 in accordance with the procedures in 40 CFR 63.457(d), or if enclosure openings are not maintained at negative pressure, take the following corrective action as soon as practicable.</p> <p>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.</p> <p>Complete the repair or corrective action no later than 15 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 Permittee determines that the emissions resulting from immediate repair would be greater than the emission likely to result from delay of repair. Repair of such equipment shall be completed by the end of the next process shutdown.</p>	40 CFR 63.453(k)(6) 40 CFR 63.457(d)
H.6	HAPs: Recordkeeping	<p>For each applicable enclosure opening, closed vent system, and closed collection system, prepare and maintain a site-specific inspection plan, including a drawing or schematic of the components of applicable affected equipment and shall record the following information for each inspection:</p> <ol style="list-style-type: none"> (1) Date of inspection; (2) Equipment type and identification; (3) Results of negative pressure tests for enclosures; (4) Results of leak detection tests; (5) The nature of the defect or leak and the method of detection; (6) The date the defect or leak was detected and the date of each attempt to repair the defect or leak; (7) Repair methods applied in each attempt to repair the defect or leak; (8) Reason for the delay if the defect or leak is not repaired within 15 days; 	40 CFR 63.454(a) and (b)

HVLC	Parameter	Limit, Monitoring, Reporting, Recordkeeping	Applicable Requirements
		(9) Expected date of successful repair of the defect or leak if the repair is not completed within 15 days; (10) Date of successful repair of the defect or leak; (11) Position and duration of opening of bypass line valves and the condition of any valve seals; and (12) Duration of the use of manual or computer-controlled bypass valves.	
H.7	HAPs: Recordkeeping	Records shall be maintained for all periods of excess emissions. Periods of excess emissions from the HVLC system are not violations of 40 CFR 63.443(c) and (d) provided that the time of excess emissions divided by the total process operating time in a semiannual reporting period does not exceed four (4) percent.	40 CFR 63.443(e)(2)

I. PULPING PROCESS CONDENSATES AND CLEAN CONDENSATE ALTERNATIVE

Emission units and processes for which pulping process condensate requirements apply include: batch digester condensates, digester condensate tank, “D” and “E” evaporator foul condensate off primary feed effects, turpentine collection system, concentrator condensate, LVHC NCG condensates, and foul condensate collection tank.

PTPC has chosen to comply with the Clean Condensate Alternative (CCA) which allows for the collection and treatment of additional condensates as an alternative to collecting and treating NCGs from specific HVLC emission units, specifically the B-side washers.

Condensates	Parameter	Limit, Monitoring, Reporting, Recordkeeping	Applicable Requirements
I.1	HAPs: Collect at least 7.2 lb of total HAPs /ODTP	Collected pulping process condensates from the equipment listed in 40 CFR 63.446(b)(1) through (5) must contain a total HAP mass of 7.2 pounds or more per oven-dry ton of unscreened brownstock.	40 CFR 63.446(c)(3)

Condensates	Parameter	Limit, Monitoring, Reporting, Recordkeeping	Applicable Requirements
I.2	HAPs: Remove at least 6.6 + 0.12 lb of total HAPs /ODTP	Pulping process condensates must be discharged below the liquid surface of a biological treatment system and must be biologically treated to remove 6.6 pounds of total HAPs or more per ton of unscreened oven-dried brownstock pulp. Treat an additional 0.12 lb of total HAPs/ODTP to demonstrate compliance with the CCA.	40 CFR 63.446(e)(2) and (4) 40 CFR 63.447(b) for Clean Condensate Alternative
I.3	HAPs: Monitoring and Testing	<p><i>Quarterly Performance Test</i></p> <p>Conduct a performance test as specified in §63.457(l) within 45 days after the beginning of each quarter and meet the applicable emission limit in 40 CFR 63.446(e)(2) and 40 CFR 63.447. The test conducted in the first quarter (annually) shall be performed for total HAPs as specified in §63.457(g) and meet the mass removal emission limit specified in Condition I.2.</p> <p>The remaining quarterly tests shall be performed in the same manner, except that the Permittee may use the applicable methanol procedure in 40 CFR 63.457(l)(2) and the value of r determined during the first quarter test instead of measuring the additional HAPs to determine a new value of r.</p> <p><i>Daily Parameter Monitoring [alternative to 40 CFR 63.453(j)(1)]</i></p> <p>Maintain aeration consisting of at least:</p> <ul style="list-style-type: none"> - Two blowers operating; or - One blower and at least eight surface aerators during periods of blower maintenance or failure. <p>Use mill computer tracking system continuously to monitor ASB blower operations. Monitoring parameters may be reestablished using the procedures in 40 CFR 63.453(n).</p>	40 CFR 63.453(j)(3) and 40 CFR 63.457(g) for quarterly testing requirement 40 CFR 63.457(l) for calculation 40 CFR 63.453(j)(2) and (n) for alternative daily monitoring 40 CFR 63.453(p) for monitoring parameter excursion requirements 40 CFR 63.455(h) for reporting

Condensates	Parameter	Limit, Monitoring, Reporting, Recordkeeping	Applicable Requirements
		<p><i>Monitoring Parameter Excursion</i></p> <p>A parameter excursion is not a violation of the applicable emission standard if the Permittee chooses to conduct a performance test to demonstrate compliance with the applicable emission limit and the results of a performance test conducted as specified in 40 CFR 63.453(p)(2) demonstrates compliance with the emission limit in Condition I.2. All sampling and measurements necessary for the performance test must be conducted before:</p> <ol style="list-style-type: none"> 1) Steps are taken to repair or adjust the operation of the process to end the parameter excursion period; and 2) Steps are taken to minimize total HAP emissions to the atmosphere during the parameter excursion period. <p><i>Reporting</i></p> <p>Report results of the performance test before the close of business on the 60th day following the completion of the performance test, unless approved otherwise in writing by Ecology.</p>	
I.4	HAPs: Condensate Collection	Pulping process condensates must be conveyed in a closed collection system that meets the individual drain system requirements specified in 40 CFR 63.960, 63.961, and 63.962, except for closed vent systems and control devices shall be designed and operated in accordance with 40 CFR 63.443(d) and 63.450, instead of in accordance with 40 CFR 63.693 as specified in 40 CFR 63.962(a)(3)(ii), (b)(3)(ii)(A), and (b)(5)(iii).	40 CFR 63.446(d)(1)
I.5	HAPs: Condensate Collection Tank (CCT)	The Condensate Collection Tank (CCT) shall be equipped so that the fixed roof and all openings are operated with no detectable leaks, as indicated by an instrument reading of less than 500 ppmdv above background as measured by 40 CFR Part 60, Appendix A, Method 21 in accordance with the procedures in 40 CFR 63.457(d).	40 CFR 63.446(d)(2) for CCT 40 CFR 63.962 (b)(2)(i)(A) per 40

Condensates	Parameter	Limit, Monitoring, Reporting, Recordkeeping	Applicable Requirements
		<p>Each opening will be maintained in a closed, sealed position at all times that the tank contains condensate, except when necessary to use the openings for sampling, removal, or for equipment inspection, maintenance or repair.</p> <p>The CCT shall be equipped with a water seal device on the overflow line.</p> <p>The CCT shall be vented to a closed vent system meeting the requirements in 40 CFR 63.450. CCT vent gases shall be incinerated in Lime Kiln and/or Power Boiler #10.</p>	<p>CFR 63.446(d)(1) for collection system requirements</p> <p>40 CFR 63.446(d)(2)(i) for venting to closed collection</p>
I.6	HAPs: Condensate Collection System Inspections	<p><i>Monthly Inspections</i></p> <p>The condensate closed collection system shall be visually inspected every 30 days. Follow the inspection requirements found in 40 CFR 63.964(a)(1)(i)(A), 63.964(a)(1)(v), and 63.964(b)(1) and (2) including:</p> <ul style="list-style-type: none"> (1) The unburied portion of the collection system piping shall be visually inspection to verify that there are no defects. (2) The inspection shall include verification that appropriate liquid level in the water seals in the CCT are being maintained and identify any other defects that could reduce water seal control effectiveness. <p>For this condition, 30 days shall be interpreted to mean: at least once per calendar month with no two consecutive inspections occurring within 14 days.</p> <p><i>Annual Inspections</i></p> <p>Condensate Collection Tank shall be inspected for detectable leaks initially and annually using the procedures in 40 CFR 63.457(d).</p> <p><i>Inspection Corrective Action</i></p> <p>If an inspection identifies visible defects in the closed collection system, or if an instrument reading of 500 ppm or greater above background is measured by 40</p>	<p>40 CFR 63.453(l), 40 CFR 63.964(a)(1)(iii), and 40 CFR 63.964(a)(1)(i)(A) for monthly inspection</p> <p>40 CFR 63.453(l)(2) for annual inspections</p> <p>40 CFR 63.453(l)(3) and 63.964(b)(1) and (2) for corrective actions</p>

Condensates	Parameter	Limit, Monitoring, Reporting, Recordkeeping	Applicable Requirements
		<p>CFR Part 60, Appendix A, Method 21 in accordance with the procedures in 40 CFR 63.457(d), then the Permittee must follow the corrective action requirements found in 40 CFR 63.964(a)(1)(i)(A), 63.964(a)(1)(v), and 63.964(b)(1) and (2) including:</p> <ol style="list-style-type: none"> (1) The first effort to repair a defect shall be no later than 5 calendar days after detection. (2) Repair shall be completed as soon as practicable but no later than 15 calendar days after detection unless the repair of the defect requires emptying or temporary removal from service of the collection system. (3) If repair of the defect requires emptying or temporary removal of the condensate collection system from service, the defect will be repaired the next time the process equipment generating the condensate stops operation. The repair of the defect will be completed before the process resumes operation. 	
I.7	HAPs: Inspection Recordkeeping	<p>For the condensate 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 and shall record the following information for each inspection:</p> <ol style="list-style-type: none"> (1) Date of inspection; (2) The equipment type and identification; (3) Results of leak detection tests; (4) The nature of the defect or leak and the method of detection (i.e., visual inspection or instrument detection); (5) The date the defect or leak was detected and the date of each attempt to repair the defect or leak; (6) Repair methods applied in each attempt to repair the defect or leak; (7) The reason for the delay if the defect or leak is not repaired within 15 days after discovery; 	40 CFR 63.453(l)(1)(i) and 40 CFR 63.454(b)

Condensates	Parameter	Limit, Monitoring, Reporting, Recordkeeping	Applicable Requirements
		(8) The expected date of successful repair of the defect or leak if the repair is not completed within 15 days; and (9) The date of successful repair of the defect or leak.	

J. PAPER MACHINE 2 (PM2)

PM2	Parameter	Monitoring & Reporting	Applicable Requirement
J.1	VOC	PM2 must be operated in a manner consistent with good pollution control practices, including minimizing usage rates and VOC contents of additive chemicals. Additives used in the papermaking process on these paper machines shall be "low-VOC." The Permittee shall annually submit a list of additive used in the paper-making process on PM2 and indentify those that are not "low-VOC."	Order 10453, Condition 3
J.2	Operations and Maintenance	An operation and maintenance manual for PM2 must be updated, maintained, and followed. A copy of the manual must be available to Ecology upon request.	Order 10453, Condition 4
J.3	Operations Consistent with Application	Any activity or operation which is undertaken by the Permittee or others, in a manner which is inconsistent with the Notice of Construction application dated December 3, 2013 and Order 10453 shall be subject to Ecology enforcement.	Order 10453, Condition 5

K. OLD CORRUGATED CONTAINER (OCC) PLANT

OCC	Parameter	Monitoring & Reporting	Applicable Requirement
K.1	Acetaldehyde, chloroform, formaldehyde	<p>Within one year of startup or within alternative Ecology approved timeline, PTPC must conduct a representative source test at the OCC pulper to quantify emissions of acetaldehyde, chloroform, and formaldehyde.</p> <p>NCASI/Weston Heated SUMMA Canister Method, NCASI Method IM/CAN/WP-99.01, or other Ecology approved method must be used.</p> <p>PTPC must notify Ecology in writing of its intention to conduct the source test and provide a source test plan for approval at least 60 calendar days before the source test is initially scheduled to begin.</p> <p>Source test report and results must be submitted to Ecology within 90 days of completion of the test. Any analytical results in addition to the specified TAPs must be included in the submitted report.</p>	NOC Order 16293, Condition 1
K.2	OCC Production	PTPC shall report to Ecology on a monthly basis, maximum daily OCC pulp production in oven-dried tons per day.	NOC Order 16293, Condition 2
K.3	Operations and Maintenance	<p>The OCC pulper must be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times. An operation and maintenance manual for the OCC pulper must be prepared to ensure emissions are minimized. The operation and maintenance manual must be followed. A copy of the manual must be available to Ecology during inspections and upon request.</p>	NOC Order 16293, Condition 3
K.4	Project Completion Notification	PTPC shall notify Ecology in writing within thirty days of completion of the OCC Pulper Upgrade project.	NOC Order 16293, Condition 4

L. RECIPROCATING INTERNAL COMBUSTION ENGINES (RICE)

EXISTING EMERGENCY COMPRESSION IGNITION RICE (≤500 HP)

The facility has three existing emergency compression ignition (CI) RICE: Main Pump Station and Clarifier Bypass Pump #2. The conditions below apply to **existing emergency compression ignition RICE (≤ 500 hp)** which are subject to the requirements of 40 CFR Part 63, Subpart ZZZZ.

Emergency RICE	Monitoring, Recordkeeping, Reporting	Applicable Requirement
L.1	<p>Change the oil and filter every 500 hours of operation or annually, whichever comes first. An oil analysis program may be used to extend the specified oil change requirement in accordance with 40 CFR 63.6625(i) or (j), as applicable.</p> <p>Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.</p> <p>Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.</p>	40 CFR Part 63, Subpart ZZZZ, Table 2c
L.2	<p>Minimize the engine's time spent at idle, and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.</p>	40 CFR 63.6625(h)
L.3	<p>There is no time limit on the use of emergency stationary RICE in emergency situations.</p> <p>Emergency RICE may operate for up to 100 hours per year for maintenance checks and readiness testing or other periods defined in 40 CFR 63.6640(f).</p> <p>Emergency RICE may operate for up to 50 hours per year in non-emergency situations not mentioned above. This time will count toward the 100 hours per year previously mentioned.</p>	40 CFR 63.6640(f)

Emergency RICE	Monitoring, Recordkeeping, Reporting	Applicable Requirement
L.4	<p>Records of the hours of operation of the engine that is recorded through the nonresettable hour meter must be maintained. Records must include how many hours are spent for emergency operation, including what classified the operation as an emergency, and how many hours are spent for nonemergency operation. If the engines are used for demand response operation, maintain records of the notification of the emergency situation and the time the engine was operated as part of demand response. Records must be kept and readily available for five (5) years following the date of each occurrence, measurement, maintenance, corrective action report, or record.</p>	<p>40 CFR 63.6655 for recordkeeping 40 CFR 63.6660 for records retention</p>
L.5	<p>The stationary RICE must be operated and maintained according to the manufacturer's emission-related operation and maintenance instructions; or</p> <p>A maintenance plan must be developed and followed which provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.</p> <p>Records must be retained of the operation and maintenance of the engines according to the manufacturer's emission-related instructions or according to the developed maintenance plan consistent with good air pollution control practice for minimizing emissions. Records must be kept and readily available for five (5) years following the date of each occurrence, measurement, maintenance, corrective action report, or record.</p>	<p>40 CFR Part 63 Subpart ZZZZ, Table 6 40 CFR 63.6655 for recordkeeping 40 CFR 63.6660 for records retention</p>
L.6	<p>Beginning January 1, 2015, existing emergency compression ignition (CI) stationary RICE with a site rating of more than 100 brake hp and a displacement of less than 30 liters per cylinder that uses diesel fuel, and operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(ii) and (iii), or that operates for the purpose specified in §63.6640(f)(4)(ii), must use diesel fuel that meets the requirements in 40 CFR 80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to January 1, 2015, may be used until depleted.</p>	<p>40 CFR 63.6604(b)</p>

EXISTING NON-EMERGENCY COMPRESSION IGNITION RICE (100 ≤ HP ≤ 500)

The facility has one existing non-emergency compression ignition RICE (100 ≤ hp ≤ 500): Diesel Fire Pump. The conditions below apply to **existing non-emergency compression ignition RICE (100 ≤ hp ≤ 500)** which are subject to the requirements of 40 CFR Part 63, Subpart ZZZZ.

Non-Emergency RICE	Parameter	Limit (shall not exceed)	Monitoring, Recordkeeping, Reporting	Applicable Requirement
L.7	CO	230 ppm _{dv} @ 15% O ₂	<p><i>Performance Testing:</i> Initial compliance performance test completed on 12/13/2018.</p> <p><i>Recordkeeping:</i> Maintain records in accordance with 40 CFR 63.6655.</p> <p><i>Reporting:</i> Submit a semi-annual compliance report in accordance with 40 CFR 63.6650, delivered or postmarked by July 31 or January 31 following the end of the respective calendar half.</p>	<p>40 CFR 63.6602 and Table 2c for limit</p> <p>40 CFR 63.6650 for reporting</p>
L.8	Recordkeeping	N/A	Maintain records in accordance with 40 CFR 63.6655.	40 CFR 63.6655 for recordkeeping
L.9	Emissions Minimization	N/A	Minimize the engine's time spent at idle, and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.	40 CFR 63.6625(h)
L.10	Good air pollution	N/A	At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air	40 CFR 63.6605(b)

Non-Emergency RICE	Parameter	Limit (shall not exceed)	Monitoring, Recordkeeping, Reporting	Applicable Requirement
	control practices		pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.	

RICE NEW SOURCE PERFORMANCE STANDARDS

The facility has three emergency compression ignition RICE for which new source performance standards in 40 CFR Part 60, Subpart IIII apply: Clarifier Bypass Pump #3, Lime Kiln Auxiliary Drive and Mud Storage Agitator Backup Generator.

RICE	Parameter	Monitoring, Reporting, Recordkeeping	Applicable Requirements
L.11	Emission Standards	The Permittee must comply with the emission standards for new nonroad CI engines in 40 CFR 60.4202, for all pollutants, for the same model year and maximum engine power for their 2007 model year and later emergency stationary CI ICE. Compliance must be demonstrated by keeping records of engine manufacturer data indicating compliance with the applicable emission standards.	40 CFR 60.4205(b), 40 CFR 89.112 and 89.113
L.12	Operations	In order for the engines to be considered an emergency stationary ICE under this 40 CFR Part 60, Subpart IIII, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-	40 CFR 60.4211(f)

RICE	Parameter	Monitoring, Reporting, Recordkeeping	Applicable Requirements
		<p>emergency situations for 50 hours per year, as described in paragraphs (1) through (3) of this condition, is prohibited. If you do not operate the engine according to the requirements in paragraphs (1) through (3) of this condition, the engine will not be considered an emergency engine and must meet all requirements for non-emergency engines.</p> <p>(1) There is no time limit on the use of emergency stationary ICE in emergency situations.</p> <p>(2) You may operate your emergency stationary ICE for any combination of the purposes specified in paragraphs (i) through (iii) of this condition for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (3) of this condition counts as part of the 100 hours per calendar year allowed by this paragraph (2).</p> <p>(i) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.</p> <p>(ii) Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §60.17), or other authorized entity as</p>	

RICE	Parameter	Monitoring, Reporting, Recordkeeping	Applicable Requirements
		<p>determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.</p> <p>(iii) Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.</p> <p>(3) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of 60.4211. Except as provided in paragraph (f)(3)(i) of 60.4211, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.</p>	
L.13	Operations and Maintenance	The Permittee must: operate and maintain the stationary CI internal combustion engines and control devices according to the manufacturer's emission-related written instructions; change only those emission-related settings that are permitted by the manufacturer; and meet the requirements of 40 CFR Parts 89, 94 and/or 1068, as applicable.	40 CFR 60.4211(a)
L.14	Fuel Requirements	The Permittee must use diesel fuel that has a maximum sulfur content of 15 ppm and a minimum cetane index of 40 or a maximum aromatic content of 35 percent by volume.	40 CFR 60.4207(b) for fuel requirements

M. MILLWIDE EMISSION LIMITS AND REQUIREMENTS

Millwide limits, except for TRS limits, apply to aggregate emissions from the Recovery Furnace, Smelt Dissolver Tank, Lime Kiln, and Power Boiler #10. Millwide TRS emission limits apply to the aggregate emissions from the Recovery Furnace, Smelt Dissolver Tank, Lime Kiln, Power Boiler #10, evaporators, and washers.

Millwide	Parameter	Limit (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirement
M.1	Particulate	729 tons/yr	Monitoring and reporting method 1.	Order 2892-05AQ, Modification 2
M.2	Particulate	1007 tons/yr	Monitoring and reporting method 1.	PSD-I
M.3	Particulate	5590 lbs/d	Monitoring and reporting method 3.	PSD-I
M.4	NOx	645 tons/yr	Monitoring and reporting method 1.	PSD-I
M.5	NOx	3580 lbs/d	Monitoring and reporting method 2.	PSD-I
M.6	CO	6204 tons/yr	Monitoring and reporting method 1.	PSD-I
M.7	CO	34500 lbs/d	Monitoring and reporting method 3.	PSD-I
M.8	VOC	182 tons/yr	Monitoring and reporting method 1.	PSD-I
M.9	VOC	1010 lbs/d	Monitoring and reporting method 3.	PSD-I
M.10	TRS	31.7 tons/yr	Monitoring and reporting method 1.	PSD-I
M.11	TRS	176 lbs/d	Monitoring and reporting method 2.	PSD-I
M.12	SO2	1300 tons/yr	Monitoring and reporting method 1.	Order 2892-05AQ, Modification 2
M.13	Pulp Production	N/A	Report average daily production of air dried unbleached pulp from chips and from the OCC process.	Order 2892-05AQ, Modification 2
M.14	Wind Speed and Direction	N/A	Wind speed and direction shall be continuously measured and recorded. Any change in location of the sensory equipment shall be approved by Ecology. Monitoring records shall be maintained at the mill.	Order 2892-05AQ, Modification 2

Monitoring and reporting methods:

1. Compliance determined by adding calendar year emission from all applicable units. Emissions from a unit for which the pollutant is measured shall be calculated using the average of test results collected during the year. Emissions from a unit for

which the pollutant is not measured shall be calculated using emission factors and production data or fuel consumption. Report annually within 30 days of the end of the calendar year.

2. Compliance determined by adding daily emissions from all applicable units. Emissions from a unit for which the pollutant is measured through source testing or continuous emission monitoring shall be calculated using the most recent test results adjusted for production/hours of operation. Emissions from a unit for which the parameter is not directly measured shall be calculated using emission factors and daily production or fuel consumption data. Report monthly.
3. Compliance determined by complying with the annual limit. If annual emissions are greater than 60% of the annual limit, during the following year, compliance shall be demonstrated by monitoring and reporting according to monitoring and reporting method 2.

N. GREENHOUSE GAS (GHG) REPORTING

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

1. Reporting Schedule. The Permittee must submit the report required under Chapter 173-441 WAC to Ecology no later than March 31 of each calendar year for GHG emissions in the previous calendar year. Unless otherwise stated, if March 31 falls on a weekend or state holiday, the report must be submitted by the next business day.

Reporting requirements begin for Calendar Year 2012 and each subsequent calendar year.

The report and certificate or representation must be submitted electronically in accordance with the requirements of WAC 173-441-050 and 173-441-060 and in a format specified by Ecology.

The Permittee must submit a revised annual GHG report within 45 days of discovering that an annual GHG report previously submitted contains one or more substantive errors.

[WAC 173-441-050(2), WAC 173-441-070, WAC 173-441-050(7)]

2. Report Content. Each annual GHG report shall contain the content specified in WAC 173-441-050(3).

Each GHG emission report and any other submission under Chapter 173-441 WAC shall be certified, signed, and submitted by the designated representative or any alternate designated representative.

Each such submission shall include the following certification statement signed by the designated representative or any alternate designated representative: "*I am authorized to make this submission on behalf of the owners and operators of the facility or supplier, 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.*"

All requests, notifications, and communications to Ecology pursuant to Chapter 173-441 WAC, other than submittal of the annual GHG report, shall be submitted to the following address:

Greenhouse Gas Report
Air Quality Program
Department of Ecology

P.O. Box 47600
Olympia, WA 98504-7600

[WAC 173-441-050(3), WAC 173-441-060(5), WAC 173-441-100]

3. Emissions Calculations. Use the calculation methodologies specified in the relevant sections of Chapter 173-441 WAC. Use the same calculation methodology throughout a reporting period unless you provide a written explanation of why a change in methodology was required.

Calibration and accuracy requirements: The Permittee must meet the applicable flow meter calibration and accuracy requirements of WAC 173-441-050(8). The accuracy specifications in this subsection do not apply where either the use of company records (as defined in WAC 173-441-020(3)) or the use of “best available information” is specified in an applicable subsection of Chapter 173-441 WAC to quantify fuel usage and/or other parameters. Further, the provisions of this subsection do not apply to stationary fuel combustion units that use the methodologies in 40 CFR Part 75 to calculate CO₂ mass emissions.

[WAC 173-441-050(4), WAC 173-441-050(8)]

4. Recordkeeping. Keep records as specified in WAC 173-441-050(6). Retain all records for at least three years. The records shall be kept in an electronic or hard copy format (as appropriate), and recorded in a form that is suitable for expeditious inspection and review. Upon request by Ecology, the records required under this section must be made available to Ecology. Records may be retained offsite if the records are readily available for expeditious inspection and review. For records that are electronically generated or maintained, the equipment or software necessary to read the records shall be made available, or, if requested by Ecology, electronic records shall be converted to paper documents.

[WAC 173-441-050(6)]

O. COMPLIANCE ASSURANCE MONITORING (CAM)

The Permittee is required to submit a CAM Plan per 40 CFR Part 64. PTPC submitted a CAM Plan with the AOP renewal permit application and an additional updated CAM plan in December 2020. A final CAM plan was submitted to Ecology by PTPC on DATE and is included in the permit’s Statement of Basis.

CAM is applicable to the Recovery Furnace (PM), Smelt Dissolver Tank (PM and opacity), Lime Kiln (PM, opacity), Power Boiler 20 (PM, opacity).

General CAM requirements:

- O.1 Obligation to monitor and data availability requirement.

Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. [40 CFR 64.7(c)]

O.2 Excursions.

The Permittee shall report excursions as defined in the unit specific monitoring requirements. An excursion does not necessarily indicate an exceedance of the applicable particulate emission standards referenced above, nor does evidence of an excursion preclude the Permittee from certifying continuous compliance as provided in Facility Wide Condition 40 of this permit if the Permittee has other data on which to base a determination of compliance during the reporting period in which the excursion occurred. (40 CFR 64.6(c)(2)(10/22/97); 40 CFR 70.6(c)(iii)(C) (6/27/03)

O.3 Response to an excursion.

Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. [40 CFR 64.7(d)]

O.4 Quality Improvement Plan (QIP).

If Ecology or U.S. EPA Region 10 determines, based on the frequency of excursions reported, review of operation and maintenance procedures and records, and reports on corrective action taken in response to an excursion, that the Permittee's corrective action procedures are not consistent with good air pollution control practice for minimizing

emissions, Ecology or U.S. EPA Region 10 may require the Permittee to develop and implement a Quality Improvement Plan. (40 CFR 64.8 and 64.6(c)(3) (10/22/97))

O.5 Reporting.

A monitoring report required by this section shall be submitted at a minimum semiannually and shall include:

(a) Summary information on the number, duration and cause (including unknown cause, if applicable) of each excursion and the corrective action taken;

(b) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and; and

(c) A description of the actions taken to implement a QIP during the reporting period, if required. Upon completion of a QIP, the Permittee shall include in the next monthly report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions occurring. [40 CFR 64.9(a)]

O.6 Recordkeeping.

The recordkeeping required by this section shall include records of the monitoring data described in this section, corrective actions taken pursuant to this section, any QIP prepared under Condition O.4, and any activities taken to implement a QIP. Instead of paper records, the Permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review. (40 CFR 64.9(b) and 64.6(c)(3) (10/22/97))

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 concentration of that pollutant, except as directed according to air pollution episode regulations. [WAC 173-400-205]
2. Emissions Detrimental to Persons or Property. The Permittee shall not cause or permit emission of any 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 install or use any means that conceal or mask an emission of an air contaminant that 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 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. Fallout. The following condition is **state only** and is not federally enforceable under the Clean Air Act: No deposit of particulate matter beyond property line so as to interfere unreasonably with 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 use and enjoyment of property must use recognized good practice and procedures to reduce odors to a reasonable minimum. [WAC 173-400-040(5)]
8. Opacity. The Permittee may not cause or allow the emission of a plume, from any emissions unit other than a Kraft recovery furnace, smelt dissolver tank, or lime kiln, which has an average opacity greater than twenty percent for more than six

consecutive minutes in any sixty minute period. The emissions unit shall comply with the alternative visible emission standard for:

- a. Soot blowing or grate cleaning in WAC 173-400-040(2)(a);
- b. Hog fuel or wood fired boiler in operation before January 24, 2018, in WAC 173-400-040(2)(e); and/or
- c. Furnace refractory in WAC 173-400-040(2)(f).

These provisions shall not apply when the presence of uncombined water is the only reason for the opacity in the plume to exceed the applicable maximum. [WAC 173-405-040(6)]

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 is taken in response to the complaint. [WAC 173-401-630]

The Permittee shall include a basic log of all complaints received during the month with each monthly report. The log must include the date and time the cause of the complaint was noted, the date and time the complaint was made, and the nature of the complaint. [WAC 173-401-615] This paragraph specifies state-only requirements which are not federally enforceable under the federal Clean Air Act. For odor complaints: PTPC shall continue to track odor complaints from members of the community specifically identifying the date, time, and nature of the complaint. The information collected will include: address where the odor occurred, time the odor was first detected, duration of the odor, description of the odor. PTPC shall investigate each complaint and determine the wind direction, speed, and ambient temperature at the time of the incident, and operating conditions in the mill at the time of the incident (e.g. equipment start-ups, shut downs, or malfunctions – time and duration of noncondensable gas (NCG) venting 3 hours before the incident). PTPC shall log actions to investigate the complaint, the status of the plant operations and emissions during the complaint period, and the corrective actions taken. Complaint logs shall be kept for a minimum of five year after the complaint occurred. [Agreed Order 5771]

10. Credible Evidence. For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of the applicable requirements cited in this requirement, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with

applicable requirements if the appropriate performance or compliance test or procedure had been performed. [40 CFR 51.212; 40 CFR 52.12; 40 CFR 52.33; 40 CFR 60.11; 40 CFR 61.12]

11. Sulfur Dioxide Emissions. The emission of sulfur dioxide from any emission unit other than a recovery furnace or lime kiln shall not exceed 1,000 parts per million for an hourly average, corrected to 7% oxygen for combustion units. [WAC 173-405-040(9)]
12. Operation and Maintenance. 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. 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 173-405-040(8)]
13. Chemical Accidental Release Program. The Permittee does not meet the applicability standards for Accidental Release Prevention Provisions under 40 CFR 68. The Permittee has a general duty to: identify hazards which may result from accidental releases using appropriate hazard assessment techniques; to design and maintain a safe facility taking such steps as are necessary to prevent releases; and to minimize the consequences of accidental releases that do occur. [40 CFR Part 68]
14. Ozone Protection.
 - a. The Permittee shall comply with the applicable standards for recycling and emissions reductions 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 Section 82.156.
 - ii. Equipment used during the maintenance, service, repair, or disposal must comply with standards for recycling and recovery equipment pursuant to Section 82.158.
 - iii. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to Section 82.161.
 - iv. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to Section 82.166. ("MVAC-like appliance" is defined at Section 82.152.)

- v. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to Section 82.156.
 - vi. Owners/operators of appliances normally containing 50 or more pounds, or refrigerant purchased and added to such appliances must do so in compliance with Section 82.166.
- b. Permittee may switch from any ozone-depleting substance to any alternative approved pursuant to the Significant New Alternatives Program (SNAP), 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 refrigerant that would otherwise be released into the atmosphere. [RCW 70A.15.6410(2), 6410(4)]
 - e. Compliance with this term and condition will be demonstrated by using a certified contractor or employee.
15. Insignificant Emission Units. The generally applicable requirements that apply to IEUs are WAC 173-405-040(5), WAC 173-400-040, WAC 173-400-050(1) & (3), and WAC 173-400-060. [WAC 173-401-530(2)(b)]
16. Used Oil Burning. The following condition is **state-only** and is not federally enforceable under the Clean Air Act: The Permittee can burn used oil if it meets the standards prescribed in RCW 70A.15.4510(1). This condition shall not apply to used oil burned in space heaters if the space heater has a maximum heat output of not greater than 0.5 million BTUs per hour or used oil burned in facilities permitted by Ecology. [RCW 70A.15.4510]
17. Asbestos. The Permittee shall comply with the applicable requirements of 40 CFR Part 61, Subpart M and WAC 173-400-075 when conducting any renovation or demolition at the facility. [40 CFR Part 61 Subpart M, WAC 173-400-075]
18. New Source Review. The Permittee shall not construct new sources or make modifications required to be reviewed under WAC 173-400-110, WAC 173-400-560, WAC 173-400-720, WAC 173-400-820, or WAC 173-460-040 before the Permittee obtains written final approval from Ecology in accordance with those regulations, pays the appropriate fees required by WAC 173-455-120, and pays the cost of public notice described in WAC 173-400-171. [WAC 173-400-110, WAC 173-400-171, WAC 173-400-560, WAC 173-400-720, WAC 173-400-820, 173-460-040]

19. Replacement or Substantial Alteration of Emission Control Technology. The following condition is **state-only** and is not federally enforceable under the Clean Air Act: Prior to replacing or substantially altering emission control technology subject to review under WAC 173-400-114, the permittee shall file for and obtain approval from Ecology according to that regulation. The permittee shall pay the appropriate fees required by WAC 173-455-100(4) prior to commencing construction. [WAC 173-400-114]
20. Nonroad Engines. The following condition is **state-only** and is not federally enforceable under the Clean Air Act: Prior to installation or operation of a nonroad engine, as defined in WAC 173-400-030, the permittee shall meet the requirements of WAC 173-400-035. If the nonroad engine(s) has a cumulative maximum rated brake horsepower greater than 500, a notification of intent to operate will be submitted to Ecology. If the nonroad engine(s) has a cumulative maximum rated break horsepower greater than 2,000, the permittee will not operate the engine(s) unless Ecology issues written approval to operate. [WAC 173-400-035]

Monitoring Requirements [WAC 173-401-630(5)(b)]

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. [WAC 173-405-072].
22. Representative Conditions. The Permittee must conduct stack tests during representative operating conditions unless required operating conditions during testing is otherwise specified. [40 CFR 60.8(c), 40 CFR 63.7(e), WAC 173-401-630(1), 40 CFR 70.6(c)(1)]
23. Unavoidable Excess Emissions. This condition applies, where applicable, to excess emissions that are claimed to be unavoidable pursuant to WAC 173400-107. 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]

After the effective date of 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]

24. 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 that 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.
25. Insignificant Emission Units. The Permittee is not subject to any testing, monitoring, reporting, or recordkeeping requirements for insignificant units or activities listed. [WAC 173-401-530(2)(c)]
26. Continuous Emission Monitoring System Operating Requirements (for CEMS required by an Order, PSD Permit, or Ecology regulation). Continuous emission monitoring systems (CEMS) required under an order, PSD permit, or regulation issued by Ecology and not subject to CEMS performance specifications and data recovery requirements imposed by 40 CFR Parts 60, 61, 62, 63, or 75 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.
- b. The Permittee shall install a continuous emission monitoring system that meets the performance specification in 40 CFR Part 60, Appendix B in effect at the time of its installation, and shall operate this monitoring system in accordance with the quality assurance procedures in Appendix F of 40 CFR Part 60 in effect on May 1, 2012, and the U.S. EPA's "Recommended Quality Assurance Procedures for Opacity Continuous Monitoring Systems" (EPA) 340/ 1-86-010.
- c. Monitoring data commencing on the clock hour and containing at least forty-five minutes of monitoring data must be reduced to one hour averages. Monitoring data for opacity is to be reduced to six minute block averages unless otherwise specified in the order of approval or permit. 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.
- d. 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.
 - i. Continuous monitoring systems for measuring opacity shall complete a minimum of one cycle of sampling and analyzing for each successive ten second period and one cycle of data recording for each successive six minute period.
 - ii. Continuous monitoring systems for measuring emissions other than opacity 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 (or other frequency as directed by terms of an order, air operating permit or regulation) to the permitting authority within thirty days after the end of the month (or

other specified reporting period) 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.

[WAC 173-400-105(7)]

27. NSPS CMS Data Recovery. Except for system breakdowns, repairs, calibration checks, and zero and span adjustments required under 40 CFR 60.13(d), all continuous monitoring systems shall be in continuous operation. All CEMS and COMS shall meet the following minimum frequency of operation requirements:

- a. All COMS shall complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one cycle of data recording for each successive 6-minute period.
- b. All CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period.

[40 CFR 60.13(e)]

The Permittee shall make every effort to acquire, maintain, and recover valid monitoring data. CMS downtime and resulting monitoring data loss due to malfunctions shall be less than 10% of the monthly unit operating time. Report CMS downtime in excess of 10% as a percentage of unit operating time in the monthly report. An explanation for the loss of monitoring data must be provided in the monthly report. Periods when CMS data is not recovered due to daily calibration, zero and span checks are not considered nor reported as CMS downtime in the monthly report. Records of daily calibration, zero and span checks shall be kept for a period of five years and made available upon request to Ecology.

[40 CFR 70.6(c)(1)]

28. MACT CMS Data Recovery. Except for system breakdowns, out-of-control periods, repairs, maintenance periods, calibration checks, and zero (low-level) and high calibration drift adjustments, all CMS (including CEMS and COMS) shall be in continuous operation. All CEMS and COMS shall meet the following minimum frequency of operation requirements:

- a. All COMS shall complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one cycle of data recording for each successive 6-minute period.
- b. All CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period.

[40 CFR 63.8(c)(4)]

The Permittee shall make every effort to acquire, maintain, and recover valid monitoring data. CMS downtime and resulting monitoring data loss due to malfunctions shall be less than 10% of the monthly unit operating time. Report CMS downtime in excess of 10% as a percentage of unit operating time in the monthly report. An explanation for the loss of monitoring data must be provided in the monthly report. Periods when CMS data is not recovered due to daily calibration, zero and span checks are not considered nor reported as CMS downtime in the monthly report. Records of daily calibration, zero and span checks shall be kept for a period of five years and made available upon request to Ecology.

[40 CFR 70.6(c)(1)]

29. Calibration of Continuous Parameter Monitoring Systems (CPMS). Unless otherwise specified, any CPMS used to show compliance with a permit condition shall be calibrated once per calendar year or as recommended by the manufacturer. Records of calibration must be kept for 5 years.

[40 CFR 70.6(c)(1)]

30. Source Test Methods. Minor modifications to a source test method may be used with the advanced approval of Ecology. In addition, the Permittee may use an equivalent alternative method with written approval from Ecology. Failure to obtain prior written approval for any test changes may invalidate the use of the test result(s) for Title V Air Operating Permit compliance purposes. [40 CFR Part 60 Subpart A and 40 CFR Part 63 Subpart A]

Recordkeeping Requirements

31. 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;
 - f. The operating conditions existing at the time of sampling or measurement. [WAC 173-401-615(2)(a); WAC 173-400-105]
32. 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 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)]
33. 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)]
34. 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 original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [WAC 173-401-615(2)(c)]
35. 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)]

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

36. Unit Reporting Requirements. In addition to any emission unit specific reporting requirements identified below, emission unit specific reporting requirements are identified in specific unit conditions of this permit.
37. Production reporting. Report within 15 days of the end of each month average daily production of air-dried unbleached pulp. [WAC 173-405-072(4)]
38. Monthly Reporting. Monthly monitoring reports required by this permit must be submitted to Ecology within 15 days of the end of each calendar month. [WAC 173-405-072].

All reports must clearly identify all instances of deviations from permit requirements and the corrective actions taken to address those deviations. [WAC 173-401-615(3)(a)]

39. Notification of Planned Source Test. The Permittee must notify Ecology of all source tests at least 30 days prior to the planned date of the test, unless otherwise specified in applicable regulations or approved by Ecology.

Notification must include the unit to be tested, parameter(s) to be tested, date(s) of testing, and test methods to be used during the testing, at a minimum. The Permittee must provide a copy of the source test plan for review upon Ecology request. [WAC 173-400-105(4), WAC 173-401-630(1), 40 CFR 70.6(c)(1)]

40. Source Testing Reports. Source test reports must be submitted to Ecology within 60 days of completion of each source test. [WAC 173-405-072]

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.

The following minimum information must be included in the source test report:

- a. Date, place, and time of sampling or measurements.
- b. General identification information for the facility, including a mailing address, the physical address, and the owner or operator or responsible official (where applicable) and their email address.
- c. Purpose of the test including the applicable regulation(s) and permit condition(s) requiring the test, the pollutant(s) and other parameters being measured, the applicable emission standard and any associated process parameter component, and a brief process description.
- d. Description of the emission unit tested including fuel burned, control devices, and vent characteristics; the appropriate source classification code (SCC; the permitted maximum process rate (where applicable); and the sampling location.

- e. Description of sampling and analysis procedures used and any modifications to standard procedures, quality assurance procedures and results, record of process operating conditions that demonstrate the applicable test conditions are met, and values for any operating parameters for which limits were being set during the test.
 - f. Date(s) analyses were performed and company or entity that performed the analyses.
 - g. Where a test method requires recording or reporting, the following shall be included: Record of preparation of standards, records of calibrations, raw data sheets for field sampling, raw data sheets for field and laboratory analyses, chain-of-custody documentation, and example calculations for reported results.
 - h. Identification of the company conducting the performance test including the primary office address, telephone number, and the contact for the test program including their email address.
 - i. Results of sampling and analyses.
 - j. Operating conditions existing at the time of sampling or measurement.
41. Providing Additional Data. For Ecology to evaluate a facility's emissions or emission control program, the Permittee shall furnish other data requested by Ecology. [WAC 173-405-072(5)]
42. Emission Inventory. Submit an inventory of emissions from the source each year no later than 105 days after the end of the calendar year; maintain records of information necessary to substantiate any reported emissions. [WAC 173-400-105(1)]
43. CEMS and COMS Data Assessment Report. For CEMS and COMS subject to the requirements of 40 CFR Part 60, submit a Data Assessment Report (DAR) quarterly (postmarked by April 15th, July 15th, October 15th, and January 15th) with the Monthly Air Monitoring Report. Include data for the previous three calendar months. The report must contain:
- a. Source owner or operator.
 - b. Identification and location of monitors in the CEMS or COMS.
 - c. Manufacturer and model number of each monitor in the CEMS or COMS.
 - d. Assessment of CEMS data accuracy and date of assessment as determined by the RATA, RAA, or CGA. The assessment must include:
 - i. The RA for the RATA or the A for the RAA or CGA;
 - ii. The RM results;
 - iii. The cylinder gas certified values;

- iv. The CEMS responses; and
- v. Calculations.

If results show the CEMS to be out-of-control, report both the audit results showing the CEMS to be out-of-control and the results of the audit following corrective action.

- e. Assessment of COMS data accuracy as determined by the quarterly performance audit or annual zero alignment, COMS responses, and calculations. If results show the COMS to be out-of-control, report both the audit results showing the COMS to be out-of-control and the results of the audit following corrective action.
- f. A summary of CEMS out-of-control periods as determined by CDs.
- g. A summary of COMS out-of-control periods as determined by the daily zero drift and upscale drift checks.
- h. A summary of all corrective actions taken when a CEMS or COMS was determined to be out-of-control.

[40 CFR Part 60 Appendix F]

44. Permit Deviations and Excess Emissions. The Permittee shall promptly submit a report of any deviations from permit conditions. [WAC 173-401-615(3)(b)]
- a. For purposes of this permit, submitting a report "promptly" means the following: (a) 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; (b) for other deviations, "promptly" means that the deviations are identified in the respective monthly report.
 - b. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. [WAC 173-401-615(3)]. The Permittee may include in its reports demonstrations that excess emissions were unavoidable, consistent with the requirements of WAC 173-400-107, or WAC 173-400-108 and WAC 173-400-109, as applicable.
45. Certification of truth, accuracy, and completeness. Any application form, report, or compliance certification required to be submitted by this permit or by Chapter 173-401 WAC shall contain certification by a responsible official of truth, accuracy, and completeness. [WAC 173-401-520]
46. Report Address. All reports and renewal applications required by this permit shall be submitted to:

Department of Ecology
Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600

47. Annual Compliance Certification. The Permittee shall submit an annual report to the Department of Ecology and to EPA Region 10 by April 15 each year, certifying compliance with the terms and conditions contained in this permit for the year the certification covers. The certification shall describe the following for all terms and conditions in this permit:

- a. The permit term or condition that is the basis of the certification;
- b. the compliance status;
- c. whether compliance was continuous or intermittent; and
- d. the methods used for determining compliance.

[WAC 173-401-630(5)]

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. [WAC 173-401-530(2)(d)]

STANDARD TERMS & CONDITIONS

1. Duty to Comply. The Permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of Chapter 70A.15 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)]
2. 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)]
3. 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)]
4. Reopening for Cause. This permit shall be reopened and revised under any of the following circumstances:
 - a. Additional applicable requirements become applicable to a major Chapter 401 source with a remaining permit term of three or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j);
 - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit;
 - c. The permitting authority or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
 - d. The administrator or the permitting authority 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]

5. Property Rights. This permit does not convey any property rights of any sort, or any exclusive privilege. [WAC 173-401-620(2)(d)]
6. 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 70A.15.2510. [WAC 173-401-620(2)(e)]
7. Permit Fees. The Permittee shall pay fees as a condition of this permit in accordance with the permitting authority's fee schedule. Failure to pay fees in a timely fashion shall subject the Permittee to civil and criminal penalties as prescribed in RCW 70A.15.2510. [WAC 173-401-620(2)(f)]
8. 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)]
9. Severability. If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable. [WAC 173-401-620(2)(h)]
10. Permit Appeals. This permit or any conditions in it may be appealed only by filing an appeal with the Pollution Control Hearings Board and serving it on the permitting authority within 30 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)]
11. Permit Continuation. This permit is issued for a 5-year term; however, 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)]
12. 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) and (2)]

The Permittee shall submit, with the permit application form, a compliance plan with a statement that:

- a. The Permittee will continue to comply with applicable requirements with which the Permittee is in compliance. [WAC 173-401-510(2)(h)(ii)(A)]
- b. The Permittee will meet applicable requirements which become effective during the permit period on a timely basis. [WAC 173-401-510(2)(h)(ii)(B)]

13. Inspection and Entry. Upon consent of the Permittee or upon presentation of credentials and other documents as may be required by law, the Department of Ecology or an authorized representative shall be allowed to:
 - a. Enter the source;
 - b. Have access to and copy at reasonable times any records that must be kept under this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by WAC 173-400-105 and the FCAA, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements. [WAC 173-400-105(3); WAC 173-401-630(2)]
14. 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]
15. 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 40 CFR 70.11(a)]
16. Transfer of Ownership or Operational Control. The Permittee must notify Ecology of any changes in ownership or operational control. The notification must include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee. [WAC 173-401-720]

PERMIT SHIELD

Pursuant to WAC 173-401-640(1), compliance with the terms and conditions of this permit is deemed to constitute compliance with applicable requirements as contained in this permit on which the term or condition is based, as of the date the permit is issued. This permit shield does not exempt the Permittee from requirements, determined to be applicable, 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)]

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

Appendix A – Permit Shield and Inapplicable Requirements

CITE	BRIEF DESCRIPTION	REASON
40 CFR 64 Compliance Assurance Monitoring	CAM requirements do not apply to the following pollutant specific emission units: Recovery Boiler SO ₂ and TRS, Lime Kiln SO ₂ and TRS, Power Boiler #10 SO ₂ and NO _x , Package Boiler PM, SO ₂ , NO _x , CO and VOC, Digester TRS	CAM applies to emission units that use a control device to achieve compliance with an applicable emission limitation or standard. 40 CFR 64.2(a)(2). The listed units do not rely on a control device to meet the listed applicable requirements.
40 CFR 64 Compliance Assurance Monitoring	CAM requirements do not apply to the following pollutant specific emission units: Recovery Boiler PM surrogate HAP limit, smelt tank PM surrogate HAP limit, lime kiln surrogate HAP limit, Digester HAP limitations	CAM exempts emission limits or standards proposed by EPA after November 15, 1990. 40 CFR 64.2(b)(1)(i). This category includes all requirements imposed through 40 CFR Part 63, Subpart MM.
40 CFR 64 Compliance Assurance Monitoring	CAM requirements do not apply to the millwide tonnage limits listed in Section H of the permit.	CAM applies to individual emission units, per 40 CFR 64.2(a). A plant-wide tonnage limit is not a “pollutant specific emission unit” as that term is defined in 40 CFR 64.1.
WAC 173-400-040	Meet most restrictive standard where 2 or more units are connected to a common stack, and unit-specific emissions data is not provided.	Facility does not have any emission units with different emission limits connected to a common stack.
WAC 173-400-040(1)	No visible emissions over 20% opacity for 3 minutes in any one hour, with 4 exceptions.	Opacity standards in the Kraft Pulping Mill regulations (Chapter 173-405 WAC) take precedence over the general emission standards of Chapter 173-400 WAC. WAC 173-405-040.
WAC 173-400-040 (3)(b)	Any emissions unit identified as a significant contributor to nonattainment must use reasonable and available control methods to control emissions of contaminants for which area is designated nonattainment.	No emissions units at the facility have been identified as a significant contributor to nonattainment.

CITE	BRIEF DESCRIPTION	REASON
WAC 173-400-040(6)	General limit of 1,000 ppm _{dv} SO ₂	SO ₂ standards for emissions units at kraft pulping mills in the Kraft Pulping Mill regulations. (Chapter 173-405 WAC) take precedence over the general emission standards of WAC 173-400. WAC 173-405-040.
WAC 173-400-040 (8)(b)	Sources of fugitive dust identified as significant contributors to a PM-10 nonattainment area must use RACT to control fugitive dust emissions.	Facility not located near a PM-10 nonattainment area.
WAC 173-400-050(1)	No particulate emissions in excess of 0.1 grain/dscf from combustion units, except no particulate emissions in excess of 0.2 grain/dscf from units combusting wood derived fuels for production of steam.	Particulate standards for combustion sources in the Kraft Pulping Mill regulations (Chapter 173-405 WAC) take precedence over the general emission standards of WAC 173-400. WAC 173-405-040.
WAC 173-400-070 (2)(a)	Hog fuel boilers must meet requirements of WAC 173-400-040 and -050(1), with exceptions.	Specific emission standards for combustion sources in the Kraft Pulping Mill regulations (Chapter 173-405 WAC) take precedence over the general emission standards of Chapter 173-400 WAC. WAC 173-405-040.
WAC 173-400-100 Registration	Registration required for listed sources, excluding sources subject to the operating permit program, after EPA grants interim or final approval to the state program.	Facility is subject to the operating permit program; EPA has granted interim approval for the state program.

CITE	BRIEF DESCRIPTION	REASON
WAC 173-400-105 (5)(a)	Continuous opacity & SO ₂ monitoring & recording required for fossil fuel-fired steam generators that are not subject to an NSPS, except where capacity is <250 million BTU/hr heat input or where there is an annual avg. capacity factor of ≥30%.	#10 Power Boiler is subject to an NSPS review.
WAC 173-400-105 (5)(d)	Continuous opacity monitoring & recording required for wood residue fuel-fired steam generators w/ capacity of ≥100 million BTU/hr heat input that are not subject to an NSPS.	#10 Power Boiler is subject to an NSPS review.
WAC 173-400-105(6)	Applies to sources that are not subject to operating permit program.	Facility is subject to the operating permit program.
WAC 173-400-151 Retrofit requirements for visibility protection	BART required for sources to which significant visibility impairment of a Class 1 area is reasonably attributable.	Facility has not been identified as a source impacting a Class I area.
WAC 173-405-040(7) <i>[STATE ONLY, NOT FEDERALLY ENFORCEABLE]</i>	Continuously employ best practicable operation and maintenance procedures for recovery furnaces or lime kilns with an alternative opacity limit.	Facility does not have any alternative opacity limits for recovery furnace or lime kiln.
WAC 173-405-077	Provisions of WAC 173-400-105(5) (Report of startup, shutdown, etc.) apply.	Old WAC 173-400-105(5) has been deleted from state regulations and the SIP.
Chapter 173-410 WAC; Sulfite Pulping Mills		Facility is not a sulfite pulping mill.
Chapter 173-433 WAC; Solid Fuel Burning Devices	Applies to wood stoves and fireplaces.	Facility does not operate such devices.

CITE	BRIEF DESCRIPTION	REASON
WAC 173-435-040(1)	Major source, when requested in writing by Ecology must prepare a Source Emission Reduction Plan (SERP) for reducing emissions during ambient air pollution episodes.	Facility has not been requested by Ecology to prepare a SERP.
WAC 173-435-060(5)	Cannot refuse entry or access to appropriate enforcement personnel determining compliance with a SERP.	Facility is not required to have a SERP.
Chapters 173-470, 474, 475, 480, 481 WAC; Ambient Air Quality Standards		WAC 173-401-200(4)(xii) states that AAQS apply to only temporary sources.
Chapter 173-490 WAC; Emission Standards and Controls for Sources of VOCs		Applies only to facility types specified in the regulation; pulp and paper mills are not specified.
40 CFR Part 52.21 (j)	PSD Best Available Control Technology Review for GHGs	Applies only to facilities that have a modification to an existing major source after July 1, 2011.
40 CFR Part 60 Subpart D	NSPS for fossil fuel fired steam generators constructed after August 17, 1971.	Recovery furnace constructed in 1968. Since then, there was no occurrence of a physical change or change in method of operation which increased pollutants to which a standard applied.
40 CFR Part 60 Subpart Db	NSPS for steam generators constructed after June 19, 1984 with a heat input rating >100 mmBtu/hr.	Recovery furnace constructed in 1968. Power boiler #10 constructed in 1977. Since then, there was no occurrence of a physical change or change in method of operation which increased pollutants to which a standard applied.

CITE	BRIEF DESCRIPTION	REASON
40 CFR Part 60 Subpart Dc	NSPS for steam generators constructed after June 9, 1989, with design heat input rating of >10 mmBtu/hr and <100 mmBtu/hr.	Recovery furnace constructed in 1968. Power boiler #10 constructed in 1977. Since then, there was no occurrence of a physical change or change in method of operation which increased pollutants to which a standard applied.
40 CFR Part 60 Subpart BB and BBa	NSPS for Kraft Pulp Mill recovery furnaces constructed or modified after 9/24/76.	Recovery furnace was installed in 1968 and not modified after 9/24/76.
40 CFR Part 60 Subpart BB and BBa	NSPS for Kraft Pulp Mill smelt dissolver tanks constructed or modified after 9/24/76.	Smelt dissolver tank was installed in 1968 and not modified after 9/24/76.
40 CFR Part 60 Subpart BB and BBa	NSPS for Kraft Pulp Mill lime kilns constructed or modified after 9/24/76.	Lime kiln was installed in 1975 and not modified after 9/24/76
40 CFR Part 60 Subpart BB and BBa	NSPS for Kraft Pulp Mill including gases from digester systems, brown stock washer systems, or multiple-effect evaporator systems constructed or modified after 9/24/76.	Digesters 1-9 were installed prior to and not modified after 9/24/76. All MEE's, except E-set, and all washers, except C-washers, were installed prior to and not modified after 9/24/76.
Order No. DE93-AQI057	Concerning electrostatic precipitator replacement.	Rescinded by Ecology, 7/6/93.
40 CFR 60.4214(c)	Concerning stationary CI internal combustion engine equipped with a diesel particulate filter.	Facility does not have CI internal combustion engines equipped with diesel particulate filters.
40CFR 60.42b(b)	Subpart Db SO ₂ emission limits.	Package boiler does not combust coal.
40 CFR 60.42b(c)	Subpart Db SO ₂ emission limits.	Package boiler does not use emerging technology.
40 CFR 60.42b(d)	Subpart Db SO ₂ emission limits.	Package boiler does not combust oil other than very low sulfur oil.
40 CFR 60.42b(f)	Subpart Db SO ₂ emission limits average basis.	Package boiler is not limited to annual capacity factor of 10% or less.
40 CFR 60.43b(c)	Subpart Db PM emission limits.	Package boiler does not combust wood.

CITE	BRIEF DESCRIPTION	REASON
40 CFR 60.43b(d)	Subpart Db PM emission limits.	Package boiler does not combust solid waste.
40 CFR 60.44b(a)(2)(i)	Subpart Db NOx emission limits.	Package boiler does not combust oil with a low heat release rate.
40 CFR 60.44b(a)(4)	Subpart Db NOx emission limits.	Package boiler does not use duct burner in a combined cycle system.
40 CFR 60.44b(b) and(c) and (d) and (e)	Subpart Db NOx emission limits.	Package boiler does not simultaneously combust mixtures of coal, oil, natural gas, solid waste, or by-product/waste.
40 CFR 60.44b(j)	Subpart Db NOx emission limit average basis.	Package boiler is not limited to annual capacity factor of 10% or less.
40 CFR 60 Subpart K	NSPS for petroleum storage vessels constructed or modified after 6/11/73 and prior to 5/19/78.	Fuel oil storage tank constructed in 1932 and not since modified.
40 CFR 60 Subpart Ka	NSPS for petroleum storage vessels constructed or modified after 5/18/78 and prior to 7/23/84.	Fuel oil storage tank constructed in 1932 and not since modified.
40 CFR 60 Subpart Kb	NSPS for petroleum storage vessels constructed or modified after 7/23/84.	Fuel oil storage tank constructed in 1932 and not since modified.
40 CFR 60 Subpart Kb	NSPS for petroleum storage vessels constructed or modified after 7/23/84.	Two oil storage tanks installed in 2014 have maximum true vapor pressure \leq 12 kPa.
40 CFR 63.450(d)(1) 40 CFR 63.454(e)	MACT 1 LVHC Non-condensable Gas Source Group: Requirement to install a flow indicator on computer controlled bypass line valves and record flow every 15 minutes	PTPC does not have any computer controlled bypass line valves.
Order DE 93-AWI063	Concerning limiting emissions from the recovery furnace corresponding with issuance of a Certificate of Emission Reduction Credit	Superseded and repealed by Order 2892-05AQ.

CITE	BRIEF DESCRIPTION	REASON
Order DE 88-195	NOC Order requiring installation of a Waterloo scrubber at Power Boiler #10 and setting appropriate conditions.	Superseded and repealed by Order 2892-05AQ.
Order DE 87-107	Order requiring demonstration of backup boiler start up in compliance with opacity limits.	Superseded and repealed by Order 2892-05AQ.
Order DE 85-209	Order requiring monthly particulate source testing at Power Boiler #10.	Superseded and repealed by Order 2892-05AQ.
Order DE 84-390 (not including Appendix A, PSD I)	Order and NOC limiting mill emissions and emissions associated with a mill expansion to produce approximately 650 tons per day of unbleached Kraft pulp and paper. Appendix A of the Order is PSD-I which addresses PSD issues associated with the mill expansion. PSD-I was not modified and is included as Appendix A to Order 2892-05AQ dated March 16, 2000.	Superseded and repealed by Order 2892-05AQ. Note: This Order contains PSD-I in its Appendix A.
Order DE 82-291	Concerning noncondensable gas (NCG) venting.	Superseded and repealed by Order 2892-05AQ.
All Orders issued prior to 1984	Order issued prior to 1984 were superseded and repealed.	Superseded and repealed by Order 2892-05AQ.
40 CFR 63.443(a)(1)(v)	Control HAP emissions from oxygen delignification systems by April 17, 2006.	PTPC does not have an oxygen delignification system.
40 CFR 63.443(c), as applied to B-side washers	Pulp washing system to be enclosed, vented to a closed-vent system and routed to control device. (Note: B-side washers were the only HLVC source requiring collection - other sources were less than the emission threshold).	PTPC elected to implement clean condensate alternative as provided in 40 CFR 63.447.

CITE	BRIEF DESCRIPTION	REASON
40 CFR 63.443(d)(1), (2), and (3)	Control devices used to reduce LVHC HAP emissions.	PTPC has implemented 40 CFR 63.443(d)(4) as the method of choice to reduce HAP emissions.
40 CFR 63.446(c) (1), and (2)	HAP-containing pulping process condensates from equipment systems.	PTPC has implemented 40 CFR 63.446(c)(3) as the method of choice.
40 CFR 63.453 (b),(c),(d),(e),(f),(g), and (h)	40 CFR Part 63 Subpart S monitoring requirements.	PTPC does not operate a thermal oxidizer, gas scrubber, bleaching system, or steam stripper.
40 CFR 63.457(a) and 63.7(g) for reporting deadline	Conduct Initial Performance Test of kraft pulping condensate control system and clean condensate alternative control system and report results within 60 days.	IPT performed and test report submitted 12/1/06.
40 CFR 63.6600	Emissions and operating limitations for stationary RICE greater than 500 BHP.	PTPC does not operate stationary RICE with BHP greater than 500.
40 CFR 63.6655(a)(5)	Document actions taken during periods of malfunction to minimize emissions and the corrective actions to restore malfunctioning processes.	Facility does not operate emergency engines with an emission limit. Therefore, this requirement, which applies to "malfunctions" is not applicable.
40 CFR 63.9(e)	Notify Ecology at least 60 days in advance of intent to perform Part 63 Initial Performance Test.	Notice provided 6/13/06 of performance test of kraft pulping condensate control system and clean condensate alternative control system.
Order No. 2892-05AQ, Table 1, E.1 & E.2.	Power Boiler #2 limits.	Power Boiler #2 has been decommissioned.
WAC 173-400-050(4)	Standards for Commercial and Industrial Solid Waste Incineration (CISWI) units	Power Boiler #10 does not qualify as a CISWI unit because it employs energy recovery (in the form of steam generation) when combusting any fuel type and does not combust fuels classified as solid waste.

CITE	BRIEF DESCRIPTION	REASON
WAC 173-434	Standards for Solid Waste Incinerator facilities	The OCC rejects and urban wood burned in Power Boiler #10 is usable fuel rather than solid waste and satisfies the wood waste exemption included in the definition of solid waste referenced within WAC 173-434-030.
40 CFR 60 Subpart CCCC	Standards of performance for commercial and industrial solid waste incinerator units constructed after November 30, 1999 or Modified or Reconstructed after June 1, 2001	Power Boiler #10 does not burn solid waste as defined in EPA's Non-Hazardous Secondary Material rule in 40 CFR Part 241, and therefore is not subject to the standards for commercial and industrial solid waste incinerator units.
40 CFR 60 Subpart DDDD	Standards of performance for commercial and industrial solid waste incinerator units constructed before November 30, 1999	Power Boiler #10 does not burn solid waste as defined in EPA's Non-Hazardous Secondary Material rule in 40 CFR Part 241, and therefore is not subject to the standards for commercial and industrial solid waste incinerator units.

Appendix B – Formulas for Emission Calculations

Permit Conditions E.1c and M.1 through M.12

$\text{lb/day} = \text{concentration} \times \text{air flow rate} \times \text{unit conversion factor} \times \text{time adjustment}$

Concentration is measured using a reference method or continuous monitor. Particulate concentrations are in gr/dscf and chemical concentrations are in ppm.

Air Flow Rate must be representative of operation. Air flow measured during the test or a “f” factor from the federal register times heat input may be used.

Unit Conversion Factor is case specific. For particulate conversions 1 lb = 7,000 grains. For ppm measurements, molar mass and molar volume for the chemical being measured are used. PM10 as a fraction of PM is based on either historical test data or AP-42 factors.

Time Adjustment is case specific and is dependent on the flow rate time unit. The measured unit is multiplied by the conversion factor to attain the desired time unit.

$\text{Tons/year} = \sum \text{lbs/day for the calendar year} \times \text{unit conversion factor}$

Unit conversion factor is 1 ton = 2,000 pounds

Appendix C – Applicable Permits and Orders

Compliance Order 18124

NOC Order 16293 (OCC Pulper Upgrade Project)

NOC Order 11025 (Boiler MACT)

NOC Order 10453 (Paper Machine No. 12 Refiner Project)

NOC Order No. DE 97AQ-I030, Second Revision

PSD-96-01A, Amendment 1

Order No. 2892-05AQ, First Modification

PSD-I

Appendix D – Definitions of Abbreviations

Abbreviation	Definition
Btu	British thermal units
BACT	Best Available Control Technology
CAA	Clean Air Act [42 U.S.C. section 7401 et seq.]
CAM	Compliance assurance monitoring
CEMS	Continuous emission monitoring system
CFR	Code of Federal Regulations
CMS	Continuous monitoring system
CO	Carbon Monoxide
COMS	Continuous opacity monitoring system
CO ₂	Carbon dioxide
CPMS	Continuous parametric monitoring system
dscf	Dry standard cubic foot
Ecology	Washington State Department of Ecology
EPA	United States Environmental Protection Agency
EU	Emission Unit
gr/dscf	Grains/dry standard cubic foot (7,000 grains = 1 pound)
gpm	Gallons per minute
HAP	Hazardous air pollutant
hr	Hour
IEU	Insignificant emission unit
lb	Pound
MACT	Maximum Achievable Control Technology
mm	One million
NESHAP	National Emission Standards for Hazardous Air Pollutants (40 CFR 61 and 63)
NOC	Notice of Construction
NO _x	Oxides of nitrogen
NSPS	New source performance standards
O ₂	Oxygen
PM	Particulate matter
PM ₁₀	Particulate matter with an aerodynamic diameter ≤ 10 microns
ppmdv	Parts per million, on a dry volume basis
PSD	Preventions of Significant Deterioration
PTE	Potential to emit
RM	Reference Method
SCR	Selective catalytic reduction
SO ₂	Sulfur dioxide
SO _x	Oxides of sulfur
tpy	Tons per year
TBLS	Tons of black liquor solids
tBACT	Toxics Best Available Control Technology
VOC	Volatile organic compounds
WAC	Washington Administrative Code

Appendix E – Footnote Key

1. Monitoring is required only when the emission unit is operating.
2. RESERVED
3. Source Test Frequency (M/Q/S/A):

Quarterly (Q): Quarterly testing must be conducted each calendar quarter between 45 and 105 days following the previous test, or as otherwise approved by Ecology. Calendar quarters are the respective periods of three consecutive calendar months starting on January 1, April 1, July 1, and October 1.

If the permittee is testing on a quarterly cycle and any single source test result exceeds the emissions limitation, the source test frequency shall increase to monthly**. Monthly source testing shall commence within 60 days of the source test which exceeded the emissions limitation.

If quarterly source test results are less than or equal to 50% of the emissions limitation for four consecutive quarters, source testing may be performed on a semiannual basis.

Semiannual (S): Semiannual source testing must be conducted each calendar half between 4 and 8 months following the previous test, or as otherwise approved by Ecology. Calendar halves are the two respective periods of six consecutive calendar months beginning January 1st and July 1st.

If the permittee is testing on a semiannual cycle and any single source test result exceeds the emissions limitation, the source test frequency shall increase to monthly**. Monthly source testing shall commence within 60 days of the source test which exceeded the emissions limitation.

If the permittee is testing on a semiannual cycle and any single source test exceeds 50% of the emissions limitation, source test frequency shall revert to quarterly**. Quarterly source testing must commence the calendar quarter following the source test which exceeded 50% of the emission limit.

If semiannual source test results are less than or equal to 25% of the emissions limitation for four consecutive calendar halves, source testing may be performed on an annual basis. Previous consecutive quarterly testing below 25% of the emissions limitation may be counted towards the “four consecutive calendar halves.”

Annual (A): Annual source testing must be conducted each calendar year between 8 and 14 months following the previous test, or as otherwise approved by Ecology.

If the permittee is testing on an annual cycle and any single source test result exceeds the emissions limitation, the source test frequency shall increase to monthly**. Monthly source testing shall commence within 60 days of the source test which exceeded the emissions limitation.

If the permittee is testing on an annual cycle and any single source test exceeds 50% of the emissions limitation, source test frequency shall revert to quarterly**. Quarterly

source testing must commence the calendar quarter following the source test which exceeded 50% of the emission limit.

If the permittee is testing on an annual cycle and any single source test exceeds 25% of the emissions limitation, source test frequency shall revert to semi-annually**. Semi-annual source testing must commence the calendar half following the source test which exceeded 25% of the emission limit.

Monthly (M): A source test must be performed in any month that the emission unit was operated more than 216 hours. If an emission unit is not operated for more than 216 hours in a month, a source test must be performed prior to the emissions unit having been operated a total of 720 hours since the end of the month of the last source test.

If monthly source test results are lower than the emissions limitation for 3 consecutive months, source testing may be performed on a quarterly basis. To qualify for quarterly source testing following an exceedance of an emissions limitation, the first of the three monthly tests with measured emissions less than the emissions limitation must not occur in the same calendar month as an emissions exceedance.

*If an emissions unit is not in operation for 180 consecutive days, the emission unit must perform a stack test within 30 days of start-up, unless otherwise approved by Ecology. Testing must begin at a quarterly frequency, unless otherwise approved by Ecology.

4. Once every five years/annually/monthly means source test is to be performed once every five years. If any single source test exceeds 75% of the limitation, source testing shall be performed annually until three consecutive year's tests are below 75% of the limitation, after which source testing may return to once every five years. If any single source test exceeds the limitation, source testing shall be performed monthly until six consecutive month tests are below the limit, after which source testing may return to once per year.