

United States Environmental Protection Agency
Region 10, Office of Air, Waste and Toxics, AWT-150
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

Permit Number: R10TNSR00200
Issued: April 19, 2016
Effective: April 19, 2016
AFS Plant I.D. Number: 53-077-00043

Minor New Source Review Permit

In accordance with the provisions of 40 CFR Part 49, Subpart C, Federal Minor New Source Review Program in Indian Country,

Neucor, Incorporated

is authorized to construct and operate the air pollution emission source described in its application and this permit in accordance with the conditions listed in this permit in the following location:

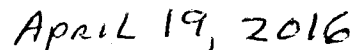
Location: Yakama Reservation
3592 Wesley Road
White Swan, Washington 98952

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Date

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1. Source Information and Emission Units

The Neucor facility is made up of two identical production lines that can operate independent of each other and produce medium density fiberboard panels. The plant will be reactivated in three stages. In Stage 1, only line 1 will operate, the line 1 dryer will be uncontrolled and the wood-fired boiler (BLR1) will not operate. In Stages 2 and 3, all emission units will operate and the dryers will be controlled by baghouses. The emission units are listed in Table 1-1. Material handling, sawing and sanding activities are separated into emission units based on their shared control devices.

SIC Code: 2493

Latitude: 46°22'56"

Longitude: 120°45'19"

Table 1-1: Emission Units and Control Devices

EU ID	Emission Unit Description	Control Device¹
BLR1 - Wood-Fired Boiler #1	Wellons brand, 47.3 MMBtu/hr, wood waste fuel; installed 1984	Wellons brand multiclone and electrostatic precipitator
BLR2 - Fuel Oil-Fired Boiler #2	Donlee brand, 37.8 MMBtu/hr, No. 2 diesel; installed 1997	None
BLR3 - Fuel Oil-Fired Boiler #3	Cleaver Brooks brand, 8.4 MMBtu/hr, No. 2 diesel fuel; installed 2005	None
D1 & D2 - Dryers #1 and #2	Refiners and indirectly steam heated Westec brand dryers on lines 1 and 2; 70 ODT/day each	None for stage 1; baghouses D1 and D2 for stages 2 and 3.
LF1 & LF2 - Blenders/Formers #1 and #2	Blenders and COE brand vacuum line formers on lines 1 and 2	Carter Day brand, model 156 RF10 baghouses F1 and F2, respectively
P1 & P2 - Presses #1 and #2	Washington Iron Works brand board presses for lines 1 and 2; 53.3 msf/day 3/4" basis each	None
C1 & C2 - Board Coolers #1 and #2	Board coolers for lines 1 and 2	None
MHS - Material Handling & Sawing	Material handling to the raw material silos, truck bin cyclone, fines cyclone, plug feeder cyclones (lines 1 & 2) and from the two-pass saw	Carter Day brand, model 375 RF10 baghouse BHS
MR1 - Material Recycling Line 1	Material handling to chip bin cyclone (line 1) and recycle cyclone (line 1)	Clarks brand, model 57-20 baghouse BH1
MR2S - Material Recycling Line 2 and Sanding	Material handling to recycle cyclone (line 2) and from the sander; when only line 1 is operating only the sander in this unit operates	Clarks brand, model 57-20 baghouse BH2
MNFA - Miscellaneous Non-Fugitive Activities	Miscellaneous non-fugitive activities generate emissions inside buildings and are not specifically described in other emission units	Inside buildings and partial buildings; the three-walled truck dump has a panel filter to collect and control dust

EU ID	Emission Unit Description	Control Device¹
MFA - Miscellaneous Fugitive Activities	Miscellaneous fugitive activities generate emissions outside buildings and are not specifically described in other emission units.	None
DT - Diesel Tank	No. 2 diesel fuel storage; 10,000 gallons	None
FP - Fire Pump Engine	Detroit Diesel brand, model 6061A (671); 188 horsepower at 1750 rpm; 11.5 gallons/hour diesel fuel; 1.495 mmBtu/hr	None
PT - Plant Traffic	Plant traffic by vehicles on paved and unpaved roads generate fugitive dust emissions.	None

¹ Listed control devices are required.

2. General Requirements

- 2.1 The provisions of this permit are severable, and in the event of any challenge to any portion of this permit or if any portion is held invalid, the remaining permit conditions shall remain valid and in force.
- 2.2 The permittee shall comply with all conditions of this permit including emission limitations that apply to the affected emissions units. Noncompliance with any permit term or condition is a violation of the permit and may constitute a violation of the Clean Air Act and is grounds for enforcement action and for a permit termination or revocation.
- 2.3 The permitted source must not cause or contribute to a NAAQS violation or in an attainment area, must not cause or contribute to a PSD increment violation.
- 2.4 It is not a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- 2.5 The permit may be revised, reopened, revoked and reissued or terminated for cause. The filing of a request by the permittee for a permit revision, revocation and re-issuance or termination or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- 2.6 The permit does not convey any property rights of any sort or any exclusive privilege.
- 2.7 The permittee shall furnish to the reviewing authority, within a reasonable time, any information that the reviewing authority may request in writing to determine whether cause exists for revising, revoking and reissuing or terminating the permit or to determine compliance with the permit. For any such information claimed to be confidential, the permittee must also submit a claim of confidentiality in accordance with 40 CFR Part 2, Subpart B.

- 2.8 Upon presentation of proper credentials, the permittee must allow a representative of the reviewing authority to:
- 2.8.1 Enter upon the premises where the source is located or emissions-related activity is conducted or where records are required to be kept under the conditions of the permit;
 - 2.8.2 Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
 - 2.8.3 Inspect, during normal business hours or while the source is in operation, any facilities, equipment (including monitoring and air pollution control equipment), practices or operations regulated or required under the permit;
 - 2.8.4 Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and
 - 2.8.5 Record any inspection by use of written, electronic, magnetic and photographic media.
- 2.9 This permit becomes invalid if construction is not commenced within 18 months after the effective date of this permit, if construction is discontinued for 18 months or more, or if construction is not completed within a reasonable time. The EPA may extend the 18-month period upon a satisfactory showing that an extension is justified. This provision does not apply to the time period between the approved phases of a phased construction project; you must commence construction of each such phase within 18 months of the projected and approved commencement date.
- 2.10 This permit does not relieve the permittee of the responsibility to comply fully with applicable provisions of any EPA-approved implementation plan, federal implementation plan or tribal implementation plan and any other requirements under applicable law.
- 2.11 If you do not construct or operate your source or modification in accordance with the terms of your minor NSR permit, you will be subject to appropriate enforcement action.

3. Emission Limits and Work Practice Requirements

- 3.1 The permittee shall not operate production line 2 unless the exhaust from line 1 dryer cyclone and line 2 dryer cyclone are controlled by baghouses designed to meet the emission limits in Table 3-3.
- 3.2 The permittee shall not operate the boiler BLR1 unless the following have occurred:
- 3.2.1 The exhaust from any operating dryer cyclone is controlled by a baghouse designed to meet the emission limits in Table 3-3; and

3.2.2 Either:

3.2.2.1 The permittee has provided written notice to Region 10 that the PM2.5 emissions from boiler BLR1 will thereafter be limited to 0.026 lb/mmBtu (in which case, this limit replaces the limit in Table 3-3); or

3.2.2.2 The permittee has performed an air quality impact analysis and received approval of the demonstration as follows:

3.2.2.2.1 The permittee shall submit to Region 10 a modeling protocol for conducting a PM2.5 24-hour air quality impact analysis using the dispersion models and procedures of 40 CFR Part 51, Appendix W;

3.2.2.2.2 After receiving approval from Region 10 for the protocol in 3.2.2.1, the permittee shall conduct an air quality impact analysis consistent with the approved protocol;

3.2.2.2.3 The permittee shall submit to Region 10 results from the air quality impact analysis in Condition 3.2.2.2.2 that demonstrate ambient air impacts will not cause or contribute to a 24-hour PM2.5 NAAQS violation; and

3.2.2.2.4 Region 10 provides written notice to the permittee that Region 10 concurs with the permittee's demonstration in Condition 3.2.2.2.3.

3.3 Emissions of all HAPs from this facility summed shall not exceed 24 tons per year as determined on a rolling 12-month basis by calculating the emissions (tons) for each month and adding the emissions (tons) for the previous eleven months. Monthly emissions (tons) shall be determined for each emission unit by multiplying the recorded monthly process rates (quantity/month) by the corresponding HAP emission factors (lb/quantity) presented in Table 3-1 of this permit, summing, and dividing by 2000 lb/ton. After the first sample required in Condition 4.6, hydrogen chloride emission factors shall be based on an average of the most recent four fuel sampling results. Until four samples have been taken, all samples taken shall be included in the average.

Table 3-1 – HAP Emission Factors¹

Emission Unit	Units	Process Rate	HAP	Form	Meth	HCl
BLR1	lb/mmBtu	mmBtu heat input	0.0402	0.0044	0.0015	0.0190
BLR2 and BLR3	lb/Mgal	Mgal oil burned	0.0411	0.0330		
D1 & D2	lb/ODT	ODT processed	0.2990	0.0200	0.2790	
LF1 & LF2	lb/ODT	ODT processed	0.1034	0.0420	0.0614	
P1 & P2	lb/Msf (3/4")	Msf board pressed	0.3000	0.3000		
C1 & C2	lb/Msf (3/4")	Msf board cooled	0.0680	0.0420	0.0250	
MHS	lb/ODT	ODT processed	0.2095		0.0135	
MR1	lb/ODT	ODT processed	0.7613	0.1036	0.4617	
MR2S (Sanding)	lb/ODT	ODT processed	0.0304	0.0110	0.0194	
MR2S	lb/ODT	ODT processed	0.8319	0.1602	0.4757	

Emission Unit	Units	Process Rate	HAP	Form	Meth	HCl
FP	lb/mmBtu	mmBtu heat input	0.0039	0.0012		

¹ Form = formaldehyde; Meth = methanol; HCl = hydrogen chloride

- 3.4 Emissions of any single HAP from this facility shall not exceed 9 tons per year as determined on a rolling 12-month basis by calculating the emissions (tons) for each month and adding the emissions (tons) for the previous eleven months. Monthly emissions (tons) shall be determined for each emission unit by multiplying the recorded monthly process rates (quantity/month) by the corresponding HAP emission factors (lb/quantity) presented in Table 3-1 of this permit, summing, and dividing by 2000 lb/ton. After the first sample required in Condition 4.6, hydrogen chloride emission factors shall be based on an average of the most recent four fuel sampling results. Until four samples have been taken, all samples taken shall be included in the average.
- 3.5 The permittee shall not sell, distribute, use, or make available for use any liquid fuel that contains more than 0.05 percent sulfur by weight. Compliance with the sulfur limit is determined using ASTM methods D2880-03, D4294-03, and D6021-96 (Reapproved 2001).
- 3.6 At all times, emissions shall not exceed the limits in Tables 3-2 and 3-3. Unless otherwise required in this permit or approved by Region 10, compliance with these limits is determined using the EPA Reference Methods in Table 3-4.

Table 3-2 - Stage 1 Emission Limits

Emission Unit	Units	CO	NO _x	PM	PM10	PM2.5	SO ₂	VOC
BLR2	lb/Mgal	5	20	2	3.3	3.3	7.1	0.2
BLR3	lb/Mgal	5	20	2	3.3	3.3	7.1	0.2
D1	lb/ODT	0.1		3.6	3.4	2.1		2.1
F1	lb/ODT			0.003	0.003	0.003		0.1
P1	lb/msf*	0.03	0.03	0.2	0.4	0.4		0.3
C1	lb/msf*			0.05	0.004	0.004		0.2
MHS (line 1)	lb/ODT			0.02	0.02	0.02		0.5
MR1	lb/ODT			0.00002	0.00002	0.00002		0.5
MR2S Line 1)	lb/ODT			0.1	0.1	0.1		0.03
FP	lb/mBtu	1.0	4.4	0.2	0.2	0.2	0.5	0.4

* Board quantity is based on ¾" basis.

Table 3-3 - Stages 2 & 3 Emission Limits

Emission Unit	Units	CO	NO _x	PM	PM10	PM2.5	SO ₂	VOC
BLR1	lb/mBtu	0.6	0.4	0.04	0.06	0.06	0.03	0.02
BLR2	lb/Mgal	5	20	2	3.3	3.3	7.1	0.2
BLR3	lb/Mgal	5	20	2	3.3	3.3	7.1	0.2
D1	lb/ODT	0.1		0.04	0.04	0.04		2.1
D2	lb/ODT	0.1		0.04	0.04	0.04		2.1
F1	lb/ODT			0.003	0.003	0.003		0.1
F2	lb/ODT			0.003	0.003	0.003		0.1
P1	lb/msf*	0.03	0.03	0.2	0.4	0.4		0.3
P2	lb/msf*	0.03	0.03	0.2	0.4	0.4		0.3

Emission Unit	Units	CO	NO_x	PM	PM10	PM2.5	SO2	VOC
C1	lb/msf*			0.05	0.004	0.004		0.2
C2	lb/msf*			0.05	0.004	0.004		0.2
MHS (line 1)	lb/ODT			0.02	0.02	0.02		0.5
MHS (line 2)	lb/ODT			0.02	0.02	0.02		0.5
MR1	lb/ODT			0.00002	0.00002	0.00002		0.5
MR2S Line 1)	lb/ODT			0.1	0.1	0.1		0.7
MR2S	lb/ODT			0.1	0.1	0.1		0.7
FP	lb/mBtu	1.0	4.4	0.2	0.2	0.2	0.5	0.4

* Board quantity is based on ¾” basis.

Table 3-4 – Required EPA Reference Methods for Testing

Pollutant/Parameter	Test Methods	Reference
CO	Method 10	40 CFR Part 60, Appendix A
NO _x	Method 7E	40 CFR Part 60, Appendix A
PM	Method 5	40 CFR Part 60, Appendix A
PM10	Method 202 plus 201 or 201A	40 CFR Part 51, Appendix M
PM2.5	Method 202 and 201A	40 CFR Part 51, Appendix M
SO2	Method 6, 6C, 8	40 CFR Part 60, Appendix A
VOC	Method 25A plus formaldehyde & methanol (see below)	40 CFR Part 60, Appendix A
Port location/traverse	Method 1, 1A	40 CFR Part 60, Appendix A
Velocity/Flow	Method 2, 2A, 2C, 2D, 2F, 2G	40 CFR Part 60, Appendix A
Gas Molecular Weight	Method 3, 3A, 3B	40 CFR Part 60, Appendix A
Gas Moisture	Method 4	40 CFR Part 60, Appendix A
Total HAP as THC	Method 25A & 18 (optional)	40 CFR part 63, Subpart DDDD
Total HAP	See Table 4, item 6	40 CFR part 63, Subpart DDDD
Methanol	See Table 4, item 7	40 CFR part 63, Subpart DDDD
Formaldehyde	See Table 4, item 8	40 CFR part 63, Subpart DDDD
Enclosure/capture	See Table 4, items 9 & 10	40 CFR part 63, Subpart DDDD

3.7 At all times after the air quality impact analysis required in 3.2.2 is performed and approved by Region 10, emissions shall not exceed the limits in Table 3-5. Unless otherwise required in this permit or approved by Region 10, compliance with these limits is determined using the EPA Reference Methods in Table 3-5.

Table 3-5 – Stage 2 & 3 PM2.5 Emission Limits, pounds per hour

Emission Unit	Emission Limit
BLR1	2.65
BLR2	0.87
BLR3	0.20
D1	0.12
D2	0.12
F1	0.01
F2	0.01
P1	0.78
P2	0.78
C1	0.01
C2	0.01

Emission Unit	Emission Limit
MHS (line 1)	0.05
MHS (line 2)	0.05
MR1	0.000004
MR2S (line 1)	0.01
MR2S	0.03
FP	0.003

3.8 Emissions shall not exceed the annual emission limits in Tables 3-6 and 3-7. Unless otherwise required in this permit, compliance with annual emission limits in Tables 3-6 and 3-7 is determined by multiplying each emission limit in Tables 3-2 or 3-3 (pounds/operation), respectively, by the actual production or fuel consumption rate for each emission unit and dividing by 2000 lb/ton.

Table 3-6 - Stage 1 Annual Emission Limits, tons per year

Emission Unit	CO	NO_x	PM	PM10	PM2.5	SO₂	VOC
BLR2	5.8	23.2	2.3	3.8	3.8	8.2	0.2
BLR3	1.3	5.3	0.5	0.9	0.9	1.9	0.1
D1	1.4		46.5	43.1	26.8		26.6
F1			0.04	0.04	0.04		1.3
P1	0.3	0.3	1.8	3.4	3.4		2.9
C1			0.5	0.04	0.04		1.5
MHS (line 1)			0.2	0.2	0.2		7.8
MR1			0.00002	0.00002	0.00002		0.4
MR2S (line 1)			0.03	0.03	0.03		0.01
FP	0.1	0.3	0.01	0.01	0.01	0.03	0.02
Total	8.9	29.1	51.9	51.5	35.3	10.1	40.9

Table 3-7 - Stages 2 & 3 Annual Emission Limits, tons per year

Emission Unit	CO	NO_x	PM	PM10	PM2.5	SO₂	VOC
BLR1	124.0	72.5	8.1	11.6	11.6	5.2	3.5
BLR2	5.8	23.2	2.3	3.8	3.8	8.2	0.2
BLR3	1.3	5.3	0.5	0.9	0.9	1.9	0.1
D1	1.4		0.5	0.5	0.5		26.6
D2	1.4		0.5	0.5	0.5		26.6
F1			0.04	0.04	0.04		1.3
F2			0.04	0.04	0.04		1.3
P1	0.3	0.3	1.8	3.4	3.4		2.9
P2	0.3	0.3	1.8	3.4	3.4		2.9
C1			0.5	0.04	0.04		1.5
C2			0.5	0.04	0.04		1.5
MHS (line 1)			0.2	0.2	0.2		7.8
MHS (line 2)			0.2	0.2	0.2		7.8
MR1			0.00002	0.00002	0.00002		0.4
MR2S (line 1)			0.03	0.03	0.03		0.01
MR2S			0.1	0.1	0.1		1.1
FP	0.1	0.3	0.01	0.01	0.01	0.03	0.02
Total	135.0	101.9	17.2	24.9	24.9	15.3	85.6

- 3.9 At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate each emission unit at the facility including associated air pollution control equipment in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the EPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
- 3.10 The permittee is prohibited from combusting any fuel other than wood in boiler BLR1.
- 3.11 The permittee shall not operate the fire pump engine more than 100 hours per year.
- 3.12 At all times, the permittee shall limit HAP and VOC emissions using the following methods:
- 3.12.1 At least 60% of the purchased furnish (raw material) shall contain no more than 15% moisture content;
- 3.12.2 Only “formaldehyde-free” resins shall be used;
- 3.12.3 Furnish shall not exceed 392 °F (three-hour block average) at any point in the process;
- 3.12.4 Furnish shall not be dried to a moisture content below 10% (by weight, oven-dried basis); and
- 3.12.5 Dryer inlet temperatures shall not exceed 260 °F.
- 3.13 Visible emissions from any air pollution source that emits, or could emit, particulate matter or other visible air pollutants shall not exceed 20% opacity, averaged over any consecutive six-minute period. Compliance with this emission limit is determined using EPA Reference Method 9 found in Appendix A of 40 CFR Part 60 or using a continuous opacity monitoring system that complies with Performance Specification 1 found in Appendix B of 40 CFR Part 60.

Fugitive Particulate Matter Requirements

- 3.14 The permittee shall take all reasonable precautions to prevent fugitive particulate matter emissions and shall maintain and operate all pollutant-emitting activities to minimize fugitive particulate matter emissions. Reasonable precautions include, but are not limited to the following:
- 3.14.1. Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, grading of roads, or clearing of land;

- 3.14.2. Application of asphalt, oil (but not used oil), water, or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces that can create airborne dust;
- 3.14.3. Full or partial enclosure of materials stockpiles in cases where application of oil, water, or chemicals is not sufficient or appropriate to prevent particulate matter from becoming airborne;
- 3.14.4. Implementation of good housekeeping practices to avoid or minimize the accumulation of dusty materials that have the potential to become airborne, and the prompt cleanup of spilled or accumulated materials;
- 3.14.5. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- 3.14.6. Adequate containment during sandblasting or other similar operations;
- 3.14.7. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne; and
- 3.14.8. The prompt removal from paved streets of earth or other material that does or may become airborne.

4. Monitoring and Recordkeeping Requirements

- 4.1 The permittee shall install, calibrate, operate and maintain, in accordance with manufacturer specifications, equipment or measurement procedures necessary to measure and record:
 - 4.1.1 Total fuel (mmBtu) combusted by boiler BLR1 and fire pump engine FP;
 - 4.1.2 Total fuel combusted (gallons) by boilers BLR2 and BLR3;
 - 4.1.3 Total furnish (oven dried tons) dried in tube dryers D1 and D2, measured at the weigh scale that discharges to the blender;
 - 4.1.4 Total furnish (oven dried tons) processed by blenders/line formers LF1 and LF2, measured at the weigh scale that discharges to the blender;
 - 4.1.5 Total board volume (msf/yr converted to ¾" basis¹) produced by presses P1 and P2 and cooled by coolers C1 and C2, measured at the gross press production after the cooler;

¹ To convert from one thickness to another use the equation in 40 CFR 63.2262(j).

- 4.1.6 Total amount of material handled² (oven dried tons) by each pneumatic system listed in the emission inventory (Appendix A in the Permit Analysis) for process units MHS, MR1 and MR2S;
 - 4.1.7 Total amount of furnish (oven dried tons) purchased each month and percentage of purchased furnish less than 15% moisture (% by weight oven-dried basis);
 - 4.1.8 Furnish moisture content (% by weight oven-dried basis) of the purchased furnish exiting the truck dump and of the dried furnish exiting the dryers;
 - 4.1.9 Furnish temperature (°F) in the steaming tube preheaters, at the inlet and outlet of the tube dryers and at the press platens; and
 - 4.1.10 For boiler BLR1, steam production (lb/hr); steam pressure (psig); boiler excess oxygen downstream of the combustion chamber (%); pressure drop across the multiclone (inches of water); and primary and secondary voltage (volts and kilovolts, respectively), primary and secondary current (amps and milliamps, respectively) and sparking rate for each field of the ESP.
- 4.2 Each month, the permittee shall calculate and record facility-wide monthly and rolling 12-month emissions for all emission units and all HAP-emitting activities at the facility using the emission factors in Table 3-1 and the actual operation and production amounts required to be monitored in Permit Condition 4.1.
- 4.3 The permittee shall record the following information, as appropriate:
- 4.3.1 The location, date and time of sampling or measurements;
 - 4.3.2 The date(s) analyses were performed;
 - 4.3.3 The company or entity that performed the analyses;
 - 4.3.4 The analytical techniques or methods used;
 - 4.3.5 The results of such analyses; and
 - 4.3.6 The operating conditions existing at the time of sampling or measurement.
- 4.4 The permittee shall maintain files of all testing, monitoring and recordkeeping information (including all reports and notifications) and supporting information required by this permit in a form suitable and readily available for expeditious inspection and review. Support information may include all calibration and maintenance records, all original strip-chart recordings or digital records for continuous monitoring

² The amount of material handled by each pneumatic system can be calculated based on material flow ratios developed and other measured operating rates.

instrumentation and copies of all reports required by the permit. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

- 4.5 The permittee shall obtain, record, and keep records of the percent sulfur by weight from the vendor for each purchase of fuel oil (diesel). If the vendor is unable to provide this information, then the permittee shall obtain a representative grab sample for each purchase and test the sample using the reference method.
- 4.6 Once during each quarter that boiler BLR1 operates and continuing for 18 months after the startup of boiler BLR1, the permittee shall sample and analyze the wood fuel for chloride content. Sampling and analysis procedures to determine chloride content in the wood fuel shall follow the procedures specified in 40 CFR § 63.7521. The results of the analyses shall be used to determine a hydrogen chloride emission factor (lb/mmBtu) for boiler BLR1 as specified in 40 CFR § 63.7521.
- 4.7 Once each month, the permittee shall monitor furnish moisture content (% by weight oven-dried basis) of the purchased furnish and the furnish exiting the truck dump by analyzing representative samples of the furnish.
- 4.8 Once each hour, the permittee shall monitor and record the moisture content (% by weight oven-dried basis) of the furnish exiting the dryers.
- 4.9 The permittee shall continuously monitor and record the furnish temperature (°F) in the steaming tube preheaters, at the inlet and outlet of the tube dryers and at the press platens.
- 4.10 Within 180 days of beginning operation of production line 1, the permittee shall measure particulate matter (PM_{2.5}) emissions from press P1 using the test methods specified in Table 3-4.
 - 4.10.1 During each PM_{2.5} source test run, the permittee shall measure the visible emissions from the press vent for at least 18 minutes of each run using EPA Reference Method 9 (40 CFR 60, Appendix A).
 - 4.10.2 During each source test run, the permittee shall record the values (and time recorded) of the press and dryer operating parameters specified in Conditions 4.1.5, 4.1.7, 4.1.8, 4.1.9, 4.8 and 4.9, the moisture content (% by weight oven-dried basis) of the furnish entering the dryer and species of wood (% of total furnish) of the furnish being dried. For monitoring devices that do not have continuous recording devices, the recorded values must consist of no fewer than three values recorded per test run.
- 4.11 Within 180 days of beginning the operation of each production line, the permittee shall measure HAP emissions from the dryers and presses using the test methods specified in

Table 3-4 and consistent with the applicable requirements in 40 CFR 63.2262 and Table 4 of 40 CFR Part 63 Subpart DDDD.

- 4.11.1 During each PM_{2.5} source test run, the permittee shall measure the visible emissions from the press vent for at least 18 minutes of each run using EPA Reference Method 9 (40 CFR 60, Appendix A).
- 4.11.2 During each source test run, the permittee shall record the values (and time recorded) of the press and dryer operating parameters specified in Conditions 4.1.3, 4.1.5, 4.1.7, 4.1.8, 4.1.9, 4.7, 4.8 and 4.9, the moisture content (% by weight oven-dried basis) of the furnish entering the dryer and species of wood (% of total furnish) of the furnish being dried and pressed. For monitoring devices that do not have continuous recording devices, the recorded values must consist of no fewer than three values recorded per test run.
- 4.12 Within 180 days of beginning operation, the permittee shall measure HAP emissions from former F1 using the test methods specified in Table 3-4.
 - 4.12.1 During each source test run, the permittee shall record the values (and time recorded) of the parameters specified in Conditions 4.1.4, 4.1.8, 4.1.9, 4.7, 4.8 and 4.9. For monitoring devices that do not have continuous recording devices, the recorded values must consist of no fewer than three values recorded per test run.
- 4.13 Within 180 days of boiler BLR1 beginning operation, the permittee shall measure particulate matter (PM_{2.5}) emissions from boiler BLR1 using the test methods specified in Table 3-4.
 - 4.13.1 During each source test run, the permittee shall measure the visible emissions from press vent for at least 18 minutes of each run using EPA Reference Method 9 (40 CFR 60, Appendix A).
 - 4.13.2 During each source test run, the permittee shall record the values (and time recorded) of the parameters specified in Condition 4.1.1 and 4.1.10. For monitoring devices that do not have continuous recording devices, the recorded values must consist of no fewer than three values recorded per test run.
 - 4.13.3 During each source test run, the permittee shall collect composite fuel samples. The permittee shall estimate and record the percentages of bark, species of wood and material less than 1/8 inch in each composite fuel sample.
 - 4.13.4 If boiler BLR1 is tested before the requirements in Conditions 3.2.1 and 3.2.2 have been completed, boiler pre-test operation and testing must occur during the second calendar quarter of the year, PM_{2.5} emissions from boiler BLR1 are limited to 1.63 pounds per hour (this limit replaces the limit in Table 3-3 for the duration of the boiler pre-test operation and testing), and the boiler cannot operate for more than a total of 10 days.

4.14 Unless otherwise required in this permit, for any emission testing required by this permit, the permittee shall meet the following requirements:

4.14.1 The permittee shall submit to EPA a source test plan 30 days prior to any required testing. The source test plan shall include and address the following elements:

- 4.14.1.1 Purpose and scope of testing;
- 4.14.1.2 Source description, including a description of the operating scenarios and mode of operation during testing and including fuel sampling and analysis procedures;
- 4.14.1.3 Schedule/dates of testing;
- 4.14.1.4 Process data to be collected during the test and reported with the results, including source-specific data identified in the emission unit sections of this permit;
- 4.14.1.5 Sampling and analysis procedures, specifically requesting approval for any proposed alternatives to the reference test methods, and addressing minimum test length (e.g., one hour, 8 hours, 24 hours, etc.) and minimum sample volume;
- 4.14.1.6 Sampling location description and compliance with the reference test methods;
- 4.14.1.7 Analysis procedures and laboratory identification;
- 4.14.1.8 Quality assurance plan;
- 4.14.1.9 Calibration procedures and frequency;
- 4.14.1.10 Sample recovery and field documentation;
- 4.14.1.11 Chain of custody procedures;
- 4.14.1.12 Quality assurance/quality control project flow chart;
- 4.14.1.13 Data processing and reporting;
- 4.14.1.14 Description of data handling and quality control procedures; and
- 4.14.1.15 Report content and timing.

4.14.2 Facilities for performing and observing the emission testing shall be provided that meet the requirements of 40 CFR 60.8(e) and Reference Method 1 (40 CFR Part 60, Appendix A).

4.14.3 Unless EPA determines in writing that other operating conditions are representative of normal operations or unless specified in the emission unit sections of this permit, the source shall be operated at a capacity of at least 90% but no more than 100% of maximum during all tests.

4.14.4 Only regular operating staff may adjust the processes or emission control devices during or within 2 hours prior to the start of a source test. Any operating adjustments made during a source test, that are a result of consultation during the tests with source testing personnel, equipment vendors, or consultants, may render the source test invalid.

4.14.5 Each source test shall follow the reference test methods specified by this permit and consist of at least three (3) valid test runs. Source test emission data shall be reported as the arithmetic average of all valid test runs and in the terms of any applicable emission limit, unless otherwise specified in the emission unit sections of this permit.

Visible and Fugitive Emission Monitoring and Recordkeeping

4.15 Once each quarter, the permittee shall visually survey each emission unit and any other pollutant emitting activity for the presence of visible emissions or fugitive emissions of particulate matter.

4.15.1 The observer conducting the visual survey must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting and wind, and the presence of uncombined water on the visibility of emissions (see 40 CFR part 60, Appendix A, Method 22).

4.15.2 For the surveys, the observer shall select a position that enables a clear view of the emission point to be surveyed that is at least 15 feet from the emission point and where the sunlight is not shining directly in the observer's eyes.

4.15.3 The observer shall observe emissions from each potential emission point for at least 15 seconds.

4.15.4 Any visible emissions or fugitive emissions of particulate matter other than uncombined water shall be recorded as a positive reading associated with the emission unit or pollutant emitting activity.

4.15.5 Surveys shall be conducted while the facility is operating, and during daylight hours.

4.16 If the observation conducted under Condition 4.15 identifies any visible emissions or fugitive emissions of particulate matter, the permittee shall:

4.16.1 Immediately upon conclusion of the visual observation in Condition 4.15, investigate the source and reason for the presence of visible emissions or fugitive emissions; and

4.16.2 As soon as practicable, take appropriate corrective action.

4.17 If the corrective actions undertaken pursuant to Condition 4.16.2 do not eliminate the visible or fugitive emissions, the permittee shall within 24 hours of the initial survey conduct a visible emissions observation of the emission point in question, for thirty minutes, using the procedures specified in Condition 3.13.

- 4.18 If any of the visible emissions observations required in Condition 4.17 or 4.19 indicate visible emissions greater than 20% opacity, the permittee shall conduct daily visible emissions observations, for thirty minutes, of the emission point in question until two consecutive daily observations indicate visible emissions of 20% opacity or less.
- 4.19 If the Method 9 visible emissions observation required in Condition 4.17, or if two consecutive daily observations required by Condition 4.18 indicate visible emissions of 20% opacity or less, the permittee shall conduct weekly visible emissions observations of the emission point for three additional weeks.
- 4.20 The permittee shall maintain records of the following:
- 4.20.1 Details of each visual survey or visible emissions observation, including date, time, observer and results for each emission unit and any other pollutant emitting activity;
 - 4.20.2 Date, time and type of any investigation conducted pursuant to Condition 4.16.1;
 - 4.20.3 Findings of the investigation, including the reasons for the presence of visible emissions or fugitive emissions of particulate matter;
 - 4.20.4 Date, time and type of corrective actions taken pursuant to Condition 4.16.2;
 - 4.20.5 Results of any Method 9 visible emissions observations conducted on the source of visible or fugitive emissions, and pursuant to Conditions 4.17 through 4.19.
- 4.21 Any observation of visible emissions in excess of Condition 3.13 is a deviation and subject to the provisions of Conditions 5.2 and 5.3.

Fugitive Dust Monitoring and Recordkeeping

- 4.22 Once each calendar year, during typical operating conditions and meteorological conditions conducive to producing fugitive dust, the permittee shall survey the facility to determine the sources of fugitive particulate matter emissions. For new sources or new operations, a survey shall be conducted within 30 days after commencing operation.
- 4.22.1 The permittee shall record the results of the survey, including the date and time of the survey and identification of any sources of fugitive particulate matter emissions found; and
 - 4.22.2 If sources of fugitive particulate matter emissions are present, the permittee shall determine the reasonable precautions that will be taken to prevent or minimize fugitive particulate matter emissions.
- 4.23 The permittee shall prepare, and update as necessary following each survey, a written plan that specifies the reasonable precautions that will be taken and the procedures to be

followed to prevent fugitive particulate matter emissions, including appropriate monitoring and recordkeeping.

- 4.23.1 For construction or demolition activities, a written plan shall be prepared prior to commencing construction or demolition.
- 4.24 The permittee shall implement the written plan, and maintain and operate all sources to minimize fugitive particulate matter emissions.
- 4.25 Efforts to comply with this section cannot be used as a reason for not complying with other applicable laws and ordinances.
- 4.26 The requirements of Conditions 4.22 through 4.25 do not apply to open burning, agricultural activities, forestry and silvicultural activities, sweat houses or lodges, non-commercial smoke houses, or activities associated with single-family residences or residential buildings with four or fewer dwelling units.

5. Reporting Requirements

- 5.1 The permittee shall report when the installation of the each baghouse controlling emissions from each dryer cyclone exhaust is completed.
- 5.2 Each year, the permittee shall submit a report containing the twelve monthly rolling 12-month HAP emissions calculations for the previous calendar year along with a summary of all deviations occurring during the previous calendar year. The report shall be submitted no later than February 15 following the reported calendar year or no later than the deadline for the annual registration report required by 40 CFR § 49.138 or the actual emission report required in 40 CFR § 71.9(h)(1) whichever is later. The report shall contain a description of all emissions estimating methods used, including emission factors and their sources, assumptions made and production data.
- 5.3 The permittee shall promptly report to the EPA by telephone (206-553-1331) deviations from permit conditions, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. Reports should also include the company name, permit number and permit condition number.
 - 5.3.1 For the purposes of Conditions 5.3, deviation means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or record keeping required by this permit. For a situation lasting more than 24 hours, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:

- 5.3.1.1 A situation where emissions exceed an emission limitation;
 - 5.3.1.2 A situation where process or emissions control device parameter values indicate that an emission limitation or work practice requirement has not been met;
 - 5.3.1.3 A situation in which observations or data collected demonstrate noncompliance with an emission limitation or work practice requirement required by the permit (including indicators of compliance revealed through parameter monitoring);
 - 5.3.1.4 A situation in which any testing, monitoring, recordkeeping or reporting required by this permit is not performed or not performed as required; and
 - 5.3.1.5 Failure to comply with a permit term that requires submittal of a report.
- 5.4 Emission test reports shall be submitted to EPA within 60 days of completing any emission test required by this permit along with items required to be recorded during the test.
- 5.5 Unless otherwise specified in this permit, any documents required to be submitted under this permit, including notifications, reports, test data, monitoring data and permit modifications shall be submitted to the Region 10 address below. A copy of each document submitted to Region 10 that does not contain confidential business information shall be sent to the Tribal address below:

Original documents go to the EPA at:

Minor NSR Air Quality Permits
 U.S. EPA - Region 10, AWT-150
 1200 Sixth Avenue, Suite 900
 Seattle, Washington 98101-3140

Copies go to Tribe at:

Air Program Manager
 The Yakama Nation
 P.O. Box 151
 Toppenish, Washington 98948

6. Abbreviations and Acronyms

§	Section
bf	Board feet
Btu	British thermal units
CAA	Clean Air Act [42 U.S.C. section 7401 et seq.]
CFR	Code of Federal Regulations
CO	Carbon monoxide
EPA	United States Environmental Protection Agency (also U.S. EPA)
ESP	Electrostatic Precipitator
gal	Gallon(s)
HAP	Hazardous air pollutant
hr	Hour
lb	Pound (lbs = pounds)
m	Thousand
MDI	Methylene diphenyl diisocyanate (resin)
mm	Million
NAAQS	National Ambient Air Quality Standard
NO _x	Nitrogen oxides
ODT	Oven dried ton

PM	Particulate matter
PM ₁₀	Particulate matter less than or equal to 10 microns in aerodynamic diameter
PM _{2.5}	Particulate matter less than or equal to 2.5 microns in aerodynamic diameter
PSD	Prevention of significant deterioration
psig	Pounds per square inch gauge
Region 10	U.S. EPA, Region 10
sf	Square feet
SIC	Standard Industrial Code
SO ₂	Sulfur dioxide
tpy	Tons per year
VOC	Volatile organic compound