

October 9, 2017

Mr. Craig Gronka, Safety & Environmental Director  
Hardel Mutual Plywood Corporation  
PO Box 540  
Chehalis, WA 98532

Subject: Final Air Discharge Permit for Installation of a Film Press

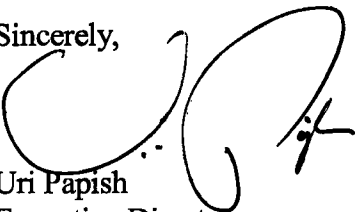
Dear Mr. Gronka:

The public comment period for the preliminary determination to issue Air Discharge Permit 17-3243 (ADP 17-3243) in response to ADP Application L-688 concluded on September 25, 2017. The Southwest Clean Air Agency (SWCAA) did not receive any adverse comments from the public relative to the preliminary determination. Therefore, a final determination to issue ADP 17-3243 has been made pursuant to Section 400-110(4) of SWCAA's General Regulations for Air Pollution Sources. Electronic copies of ADP 17-3243 and the associated Technical Support Document are available for public review in the permit section of SWCAA's internet home page (<http://www.swcleanair.org/permits/adpfinal.asp>). Original copies are enclosed for your files.

This Air Discharge Permit may be appealed directly to the Pollution Control Hearings Board (PCHB) at P.O. Box 40903, Olympia, Washington 98504-0903 within 30 days of receipt as provided in RCW 43.21B.

If you have any comments, or desire additional information, please contact Wess Safford at (360) 574-3058, extension 126.

Sincerely,



Uri Papish  
Executive Director

UP:wls  
Attachment

Cc: Air Permit Section AWT-150  
US EPA Region X  
1200 6th Avenue, AT-150  
Seattle, WA 98101



**SOUTHWEST CLEAN AIR AGENCY**

**AIR DISCHARGE PERMIT  
17-3243**

**Final Date: October 9, 2017**

Facility Name: Hardel Mutual Plywood Corporation  
Physical Location: 143 Maurin Road  
Chehalis, WA 98532

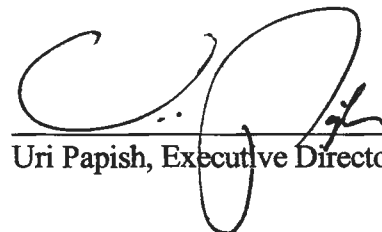
SWCAA ID: 2026

REVIEWED BY:

  
Paul T. Mairose, Chief Engineer



APPROVED BY:

  
Uri Papish, Executive Director

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**1. Equipment/Activity Identification**

<b>ID No.</b>	<b>Generating Equipment/Activity</b>	<b># of Units</b>	<b>Control Measure/Equipment</b>	<b># of Units</b>
1	Wood Fired Fluid Heater (Wellons / RC2C7.0)	1	Electrostatic Precipitator (PPC Industries / 11R-1228-2712S)	1
2	Natural Gas Fired Fluid Heater (American Heating Co. / AHE-1200)	1	Low NO <sub>x</sub> Burner (Ponder Burner / LNVG-147)	1
3	Veneer Dryers #2 & #3 (Coe Manufacturing)	2	Regenerative Catalytic Oxidizer #1 (Geoenergy / 27-2-KT)	1
4	Veneer Dryer #1 (Coe Manufacturing)	1	Regenerative Catalytic Oxidizer #2 (Western Pneumatics / 7X13R)	1
5	Hot Press #1 (Spar Tek / 4' x 8' x 40)	1	Draft Curtain	1
6	Hot Press #2 (Coe Manufacturing / 4' x 10' x 40)	1	Draft Curtain	1
7	Hot Press #3 (Williams White / 5' x 10' x 30)	1	Draft Curtain	1
8	Hot Press #4 (Williams White / 5' x 10' x 30)	1	Draft Curtain	1
9	Saw Line #1 Material Collection System	1	Baghouse #1 (Torit / 324 RFW-10)	1
10	Saw Line #1 Material Collection System	1	Baghouse #2 (Carothers & Son / 330TR12HEI)	1
11	Saw Line #2 Material Collection System	1	Baghouse #3 (Carothers & Son / 330TR12HEI)	1
12	Saw Line #2 Material Collection System	1	Baghouse #4 (Torit / 232 RFW-10)	1
13	Sander Material Collection System	1	Baghouse #5 (Carothers & Sons / 450TR12HEI)	1
14	Fuel Bin and Yard Hog Material Collection System	1	Baghouse #6 (Torit / 324 RFW-10)	1
15	Northside Saws and Hog Material Collection System	1	Baghouse #7 (Torit-Donaldson / 324 RFW-10)	1
16	Truck Load-out Bin	1	Vent Filter (Carothers & Son / CSL 16-8)	1
17	Film Press #1	1	Low Emission Resin Formulation	N/A

**2. Approval Conditions**

The following tables detail the specific requirements of this permit. In addition to the requirements listed below, equipment at this facility may be subject to other federal, state, and local regulations. The permit requirement number is identified in the left hand column. The text of the permit requirement is contained in the middle column. The emission unit, equipment, or activity to which the permit requirement applies is listed in the right hand column.

This Permit supersedes Air Discharge Permit 13-3043R1 in its entirety.

**2.1 Emission Limits**

No.	Emission Limits	Equipment/ Activity												
1.	<p>Emissions from the Wellons fluid heater/ESP shall not exceed the following:</p> <table border="0"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>NO<sub>x</sub></td> <td>80.00 tpy, 148 ppmvd @ 7% O<sub>2</sub> (1-hr avg)</td> </tr> <tr> <td>CO</td> <td>66.10 tpy, 202 ppmvd @ 7% O<sub>2</sub> (1-hr avg)</td> </tr> <tr> <td>PM (filterable)</td> <td>10.16 tpy, 0.012 gr/dscf @ 7% O<sub>2</sub></td> </tr> <tr> <td>NMHC</td> <td>34.80 tpy, 0.1 lb/MMBtu</td> </tr> <tr> <td>SO<sub>2</sub></td> <td>13.60 tpy, 18 ppmvd @ 7% O<sub>2</sub></td> </tr> </tbody> </table> <p>Annual emissions shall be calculated based on calculated heat input, actual hours of operation, and the most recent emission test data and factors consistent with the methodology in Section 6 of the Technical Support Document for this Permit. Compliance with the annual emission limits for NO<sub>x</sub> and CO shall be determined for each 12 consecutive month period rolled monthly.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO <sub>x</sub>	80.00 tpy, 148 ppmvd @ 7% O <sub>2</sub> (1-hr avg)	CO	66.10 tpy, 202 ppmvd @ 7% O <sub>2</sub> (1-hr avg)	PM (filterable)	10.16 tpy, 0.012 gr/dscf @ 7% O <sub>2</sub>	NMHC	34.80 tpy, 0.1 lb/MMBtu	SO <sub>2</sub>	13.60 tpy, 18 ppmvd @ 7% O <sub>2</sub>	1
<u>Pollutant</u>	<u>Emission Limit</u>													
NO <sub>x</sub>	80.00 tpy, 148 ppmvd @ 7% O <sub>2</sub> (1-hr avg)													
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NMHC	34.80 tpy, 0.1 lb/MMBtu													
SO <sub>2</sub>	13.60 tpy, 18 ppmvd @ 7% O <sub>2</sub>													
2.	<p>Visible emissions shall not exceed 5% opacity for more than 3 minutes in any one hour period as determined by a Certified Observer in accordance with SWCAA Method 9. This limit does not apply during periods of cold start-up or soot blowing/grate cleaning.</p> <p>Routine cold start-up periods shall not last longer than 8 hours from the time fire commences. Cold start-ups subsequent to refractory repair may be extended as necessary to properly cure the refractory.</p>	1												
3.	<p>Emissions from the American Heating Company fluid heater shall not exceed the following:</p> <table border="0"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>NO<sub>x</sub></td> <td>2.34 tpy, 30 ppmvd @ 3% O<sub>2</sub> (1-hr avg)</td> </tr> <tr> <td>CO</td> <td>3.09 tpy, 65 ppmvd @ 3% O<sub>2</sub> (1-hr avg)</td> </tr> </tbody> </table> <p>Annual emissions shall be calculated based on actual fuel consumption and the most recent emission test data and factors consistent with the methodology in Section 6 of the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO <sub>x</sub>	2.34 tpy, 30 ppmvd @ 3% O <sub>2</sub> (1-hr avg)	CO	3.09 tpy, 65 ppmvd @ 3% O <sub>2</sub> (1-hr avg)	2						
<u>Pollutant</u>	<u>Emission Limit</u>													
NO <sub>x</sub>	2.34 tpy, 30 ppmvd @ 3% O <sub>2</sub> (1-hr avg)													
CO	3.09 tpy, 65 ppmvd @ 3% O <sub>2</sub> (1-hr avg)													
4.	<p>Emissions from veneer dryer oxidizer #1 shall not exceed the following:</p> <table border="0"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>NO<sub>x</sub></td> <td>2.00 tpy, 0.45 lb/hr</td> </tr> <tr> <td>CO</td> <td>11.65 tpy, 2.66 lb/hr</td> </tr> <tr> <td>PM<sub>10</sub> (total)</td> <td>15.33 tpy, 0.02 gr/dscf</td> </tr> <tr> <td>VOC</td> <td>5.70 tpy, 1.3 lb/hr</td> </tr> </tbody> </table> <p>Annual emissions shall be calculated based on actual veneer throughput and the most recent emission test data and factors consistent with the methodology in Section 6 of the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO <sub>x</sub>	2.00 tpy, 0.45 lb/hr	CO	11.65 tpy, 2.66 lb/hr	PM <sub>10</sub> (total)	15.33 tpy, 0.02 gr/dscf	VOC	5.70 tpy, 1.3 lb/hr	3		
<u>Pollutant</u>	<u>Emission Limit</u>													
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CO	11.65 tpy, 2.66 lb/hr													
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VOC	5.70 tpy, 1.3 lb/hr													

No.	Emission Limits	Equipment/ Activity												
5.	<p>Emissions from the veneer dryer oxidizer #2 shall not exceed the following:</p> <table border="0"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>NO<sub>x</sub></td> <td>0.88 tpy, 0.20 lb/hr</td> </tr> <tr> <td>CO</td> <td>5.21 tpy, 1.19 lb/hr</td> </tr> <tr> <td>PM<sub>10</sub> (total)</td> <td>6.83 tpy, 0.02 gr/dscf</td> </tr> <tr> <td>VOC</td> <td>2.76 tpy, 0.63 lb/hr</td> </tr> </tbody> </table> <p>Annual emissions shall be calculated based on actual veneer throughput and the most recent emission test data and factors consistent with the methodology in Section 6 of the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO <sub>x</sub>	0.88 tpy, 0.20 lb/hr	CO	5.21 tpy, 1.19 lb/hr	PM <sub>10</sub> (total)	6.83 tpy, 0.02 gr/dscf	VOC	2.76 tpy, 0.63 lb/hr	4		
<u>Pollutant</u>	<u>Emission Limit</u>													
NO <sub>x</sub>	0.88 tpy, 0.20 lb/hr													
CO	5.21 tpy, 1.19 lb/hr													
PM <sub>10</sub> (total)	6.83 tpy, 0.02 gr/dscf													
VOC	2.76 tpy, 0.63 lb/hr													
6.	<p>Combined emissions from hot press operations shall not exceed the following:</p> <table border="0"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>PM<sub>10</sub> (total)</td> <td>22.50 tpy</td> </tr> <tr> <td>VOC</td> <td>12.66 tpy</td> </tr> <tr> <td>Formaldehyde</td> <td>364 lb/yr</td> </tr> <tr> <td>Methanol</td> <td>8.43 tpy</td> </tr> <tr> <td>Phenol</td> <td>4.02 tpy</td> </tr> </tbody> </table> <p>Annual emissions shall be calculated based on actual press throughput and resin consumption consistent with the methodology in Section 6 of the Technical Support Document for this Permit. Compliance with the annual emission limit for methanol shall be determined for each 12 consecutive month period rolled monthly.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM <sub>10</sub> (total)	22.50 tpy	VOC	12.66 tpy	Formaldehyde	364 lb/yr	Methanol	8.43 tpy	Phenol	4.02 tpy	5-8
<u>Pollutant</u>	<u>Emission Limit</u>													
PM <sub>10</sub> (total)	22.50 tpy													
VOC	12.66 tpy													
Formaldehyde	364 lb/yr													
Methanol	8.43 tpy													
Phenol	4.02 tpy													
7.	<p>Emissions from the material collection system baghouses shall not exceed the following:</p> <table border="0"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>PM (filterable)</td> <td>0.005 gr/dscf</td> </tr> <tr> <td>PM<sub>10</sub> (filterable)</td> <td>37.19 tpy (all units combined)</td> </tr> </tbody> </table> <p>Annual emissions shall be calculated based on actual hours of operation, the rated airflow of each baghouse, and the most recent emission test data consistent with the methodology in Section 6 of the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM (filterable)	0.005 gr/dscf	PM <sub>10</sub> (filterable)	37.19 tpy (all units combined)	9-16						
<u>Pollutant</u>	<u>Emission Limit</u>													
PM (filterable)	0.005 gr/dscf													
PM <sub>10</sub> (filterable)	37.19 tpy (all units combined)													
8.	<p>Emissions from film operation shall not exceed the following:</p> <table border="0"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>VOC</td> <td>0.19 tpy</td> </tr> <tr> <td>Formaldehyde</td> <td>19.7 lb/yr</td> </tr> <tr> <td>Methanol</td> <td>0.18 tpy</td> </tr> <tr> <td>Phenol</td> <td>3.9 lb/yr</td> </tr> </tbody> </table> <p>Annual emissions shall be calculated based on actual press throughput and overlay paper consumption consistent with the methodology in Section 6 of the Technical Support Document for this Permit. Compliance with the annual emission limit for methanol shall be determined for each 12 consecutive month period rolled monthly.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	VOC	0.19 tpy	Formaldehyde	19.7 lb/yr	Methanol	0.18 tpy	Phenol	3.9 lb/yr	17		
<u>Pollutant</u>	<u>Emission Limit</u>													
VOC	0.19 tpy													
Formaldehyde	19.7 lb/yr													
Methanol	0.18 tpy													
Phenol	3.9 lb/yr													
9.	<p>Visible emissions from approved equipment shall not exceed 0% opacity for more than 3 minutes in any one hour period as determined by a Certified Observer in accordance with SWCAA Method 9.</p>	2-17												

**2.2 Operating Limits and Requirements**

No.	Operating Limits and Requirements	Equipment/ Activity
10.	Reasonable precautions shall be taken at all times to prevent and minimize fugitive emissions from plant operations.	Plantwide
11.	The permittee shall use recognized good practice and procedures to reduce odors to a reasonable minimum.	Plantwide
12.	Each pollution control device shall be operated whenever the processing equipment served by that control device is in operation. Control devices shall be operated and maintained in accordance with the manufacturer's specifications. Furthermore, control devices shall be operated in a manner that minimizes emissions.	1-17
13.	Emission units identified in this Permit shall be maintained and operated in total and continuous conformity with the conditions identified in this Permit. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this Permit, including directing the facility to cease operations until corrective action can be completed.	1-17
14.	The Wellons fluid heater/ESP shall be equipped with the following: (a) A continuous opacity monitor system (COMS) calibrated, maintained, and operated in accordance with the applicable procedures under Performance Specification 1 (40 CFR 60, Appendix B); and (b) An oxygen meter capable of continuously monitoring oxygen levels in the exhaust gas.	1
15.	The Wellons fluid heater/ESP shall only be fired on wood waste containing no appreciable quantity of dirt, debris or bark.	1
16.	The American Heating Company fluid heater shall be fired on natural gas only.	2
17.	Corrective action shall be taken within 7 days if emission monitoring results from the American Heating Company fluid heater indicate emission concentrations in excess of 30 ppmv NO <sub>x</sub> or 65 ppmv CO, corrected to 3% O <sub>2</sub> . Corrective action includes, but is not limited to, maintenance activity or retesting for each pollutant of concern using a reference test method. Corrective action shall be pursued until observed emission concentrations no longer exceed 30 ppmv NO <sub>x</sub> or 65 ppmv CO.	2
18.	The combustion chamber temperature of the veneer dryer oxidizers shall be maintained at 800°F or greater.	3-4
19.	All exhaust gases from drying sections in the veneer dryers shall be treated in the veneer dryer oxidizers prior to ambient discharge.	3-4
20.	Corrective action shall be taken within 7 days if emission monitoring results from the veneer dryer oxidizers indicate emission concentrations in excess of 3 ppmv NO <sub>x</sub> or 30 ppmv CO. Corrective action includes, but is not limited to, maintenance activity or retesting for each pollutant of concern using a reference test method. Corrective action shall be pursued until observed emission concentrations no longer exceed 3 ppmv NO <sub>x</sub> or 30 ppmv CO.	3-4
21.	Combined resin consumption in hot press operations shall not exceed 20,100,000 lb/yr.	5-8

No.	Operating Limits and Requirements	Equipment/ Activity																				
22.	Overlay paper consumption in film press operations shall not exceed 1,965,275 lb/yr.	17																				
23.	Baghouse #5 shall not operate more than 6,000 hr/yr.	13																				
24.	Baghouses #1 and #4 shall only operate during maintenance activities and periods in which Baghouses #2 and #3 (respectively) experience an operational failure.	9, 12																				
25.	Baghouses #2, #3, #6 and #7 shall be equipped with differential pressure gauges capable of continuously measuring the pressure drop across filtration media in the baghouse.	10-11, 14-15																				
26.	<p>Exhaust gases from approved emission units shall be discharged vertically at the minimum height listed below for each unit. Rain caps or other devices that inhibit vertical discharge are prohibited.</p> <table border="0" data-bbox="240 625 1203 993"> <thead> <tr> <th data-bbox="240 625 423 657"><u>Emission Unit</u></th> <th data-bbox="850 625 1203 657"><u>Minimum Discharge Height</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="240 657 570 688">Wellons Fluid Heater/ESP</td> <td data-bbox="850 657 1133 688">75' above ground level</td> </tr> <tr> <td data-bbox="240 688 764 720">American Heating Company Fluid Heater</td> <td data-bbox="850 688 1133 720">52' above ground level</td> </tr> <tr> <td data-bbox="240 720 565 751">Veneer Dryer Oxidizer #1</td> <td data-bbox="850 720 1133 751">37' above ground level</td> </tr> <tr> <td data-bbox="240 751 565 783">Veneer Dryer Oxidizer #2</td> <td data-bbox="850 751 1133 783">40' above ground level</td> </tr> <tr> <td data-bbox="240 783 391 814">Hot Presses</td> <td data-bbox="850 783 1133 814">36' above ground level</td> </tr> <tr> <td data-bbox="240 814 375 846">Film Press</td> <td data-bbox="850 814 1133 846">43' above ground level</td> </tr> <tr> <td data-bbox="240 846 483 877">Baghouses #2 &amp; #3</td> <td data-bbox="850 846 1133 877">43' above ground level</td> </tr> <tr> <td data-bbox="240 877 402 909">Baghouse #6</td> <td data-bbox="850 877 1133 909">28' above ground level</td> </tr> <tr> <td data-bbox="240 909 402 940">Baghouse #7</td> <td data-bbox="850 909 1133 940">32' above ground level</td> </tr> </tbody> </table>	<u>Emission Unit</u>	<u>Minimum Discharge Height</u>	Wellons Fluid Heater/ESP	75' above ground level	American Heating Company Fluid Heater	52' above ground level	Veneer Dryer Oxidizer #1	37' above ground level	Veneer Dryer Oxidizer #2	40' above ground level	Hot Presses	36' above ground level	Film Press	43' above ground level	Baghouses #2 & #3	43' above ground level	Baghouse #6	28' above ground level	Baghouse #7	32' above ground level	1-8, 10-11, 14-15, 17
<u>Emission Unit</u>	<u>Minimum Discharge Height</u>																					
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Film Press	43' above ground level																					
Baghouses #2 & #3	43' above ground level																					
Baghouse #6	28' above ground level																					
Baghouse #7	32' above ground level																					

### 2.3 Monitoring and Recordkeeping Requirements

No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity
27.	With the exception of data logged by a computerized data acquisition system, each record required by this Permit shall include the date and the name of the person making the record entry. If a control device or process is not operating during a specific time period, a record shall be made to that effect.	1-17
28.	All records required by this Permit shall be kept for a minimum period of no less than five years and shall be maintained in a form readily available for inspection by SWCAA representatives.	1-17
29.	Excess emissions and upset conditions shall be recorded for each occurrence.	1-17





**2.4 Emission Monitoring and Testing Requirements**

No.	Emission Monitoring and Testing Requirements	Equipment/ Activity
36.	The Wellons fluid heater/ESP shall be emission tested no later than December, 2009. Subsequent emission testing shall be conducted on a rolling five year cycle, no later than the end of December of the year in which testing is due. All emission testing shall be conducted in accordance with Appendix A of this Permit and 40 CFR 60.45c.	1
37.	The American Heating Company fluid heater shall be emission tested no later than the end of November 2013. Subsequent emission testing shall be conducted on a rolling five year cycle, no later than the end of November of the year in which testing is due. All emission testing shall be conducted in accordance with Appendix B of this Permit.	2
38.	The American Heating Company fluid heater shall be emission monitored annually no later than the end of November of each year. All emission monitoring shall be conducted in accordance with Appendix G of this Permit. Emission monitoring is not required in any year that formal emission testing is conducted pursuant to Requirement #34 of this Permit.	2
39.	The veneer dryer oxidizers shall be emission tested no later than September, 2010. Subsequent emission monitoring shall be conducted on a rolling five year cycle, no later than the end of September of the year in which testing is due. All emission testing shall be conducted in accordance with Appendix C of this Permit.	3-4
40.	The veneer dryer oxidizers shall be emission monitored no later than September, 2006. Subsequent emission monitoring shall be conducted on a 12 month cycle, no later than the end of September. All emission monitoring shall be conducted in accordance with Appendix D of this Permit.	3-4
41.	Baghouses #2 and #3 shall be emission tested no later than September, 2016. Subsequent emission testing shall be conducted on rolling ten year cycle, no later than the end of September of the year in which testing is due. All emission testing shall be conducted in accordance with Appendix E of this Permit.	10-11
42.	Baghouse #5 shall be emission tested no later than December, 2014. Subsequent emission testing shall be conducted on rolling ten year cycle, no later than the end of December of the year in which testing is due. All emission testing shall be conducted in accordance with Appendix E of this Permit.	13
43.	Baghouse #7 shall be emission tested no later than September, 2018. Subsequent emission testing shall be conducted on rolling ten year cycle, no later than the end of the month in which the original testing was performed. All emission testing shall be conducted in accordance with Appendix E of this Permit.	15

**2.5 Reporting Requirements**

No.	Reporting Requirements	Equipment/ Activity
44.	All air quality related complaints received by the permittee shall be reported to SWCAA within three days of receipt.	Facilitywide

No.	Reporting Requirements	Equipment/ Activity
45.	An annual emissions inventory report shall be submitted in accordance with SWCAA 400-105(1). In addition to the emissions information required under SWCAA 400-105(1), each annual report shall include an estimate of annual emission quantities for each TAP compound listed in the Technical Support Document for this Permit.	1-17
46.	<p>Excess emissions shall be reported to SWCAA as follows:</p> <ul style="list-style-type: none"> <li>• As soon as possible, but no later than 12 hours after discovery for emissions that represent a potential threat to human health or safety;</li> <li>• As soon as possible, but no later than 48 hours after discovery for emissions which the permittee wishes to claim as unavoidable pursuant to SWCAA 400-107(1); and</li> <li>• No later than 30 days after the end of the month of discovery for all other excess emissions.</li> </ul>	1-17
47.	Deviations from permit conditions shall be reported no later than 30 days after the end of the month during which the deviation is discovered.	1-17
48.	<p>SWCAA shall be notified at least seven days in advance of the use of any new material, which will result in emissions of toxic or hazardous air pollutants not listed in this Order. The written notice shall include the following:</p> <ol style="list-style-type: none"> <li>(a) A description of the proposed change(s) in materials with an MSDS for each new material,</li> <li>(b) The date the change(s) is (are) to be made,</li> <li>(c) The change(s) in emissions of VOCs, HAPs and TAPs occurring as a result of the change, and</li> <li>(d) A summary of any applicable requirement(s) that would apply as a result of the change(s).</li> </ol> <p>If the proposed emission rate of a new TAP exceeds one or more SQERs and/or the VOC limits established by this Order or otherwise circumvents an applicable requirement including those established by this Order, New Source Review shall be required prior to making the proposed change.</p>	1-17
49.	<p>The following operational information for the Wellons fluid heater/ESP shall be reported to SWCAA in writing no later than 30 days after the end of each calendar quarter:</p> <ol style="list-style-type: none"> <li>(a) Opacity exceedance reports,</li> <li>(b) Fuel consumption,</li> <li>(c) Hours of operation,</li> <li>(d) Monthly Btu/hr input calculations, and</li> <li>(e) Air emissions.</li> </ol>	1
50.	Cold start-up periods for the Wellons fluid heater/ESP shall be reported to SWCAA for each occurrence.	1
51.	<p>The following operational information for the American Heating Company fluid heater shall be reported to SWCAA in writing no later than 30 days after the end of each calendar quarter:</p> <ol style="list-style-type: none"> <li>(a) Fuel consumption,</li> <li>(b) Hours of operation, and</li> <li>(c) Air emissions.</li> </ol>	2

No.	Reporting Requirements	Equipment/ Activity
52.	The following operational information for the veneer dryers/oxidizers shall be reported to SWCAA in writing no later than 30 days after the end of each calendar quarter: (a) Combined production through dryers, (b) Hours of operation for each dryer in "abort" mode, and (c) Air emissions.	3-4
53.	The following operational information for the hot presses shall be reported to SWCAA in writing no later than 30 days after the end of each calendar quarter: (a) Production through each press, (b) Resin consumption, and (c) Air emissions.	5-8
54.	The following operational information for the material collection and handling systems shall be reported to SWCAA in writing no later than 30 days after the end of each calendar quarter: (a) Hours of operation for each baghouse, and (b) Air emissions.	9-16
55.	The following operational information for the film press shall be reported to SWCAA in writing no later than 30 days after the end of each calendar quarter: (a) Laminated plywood production, (b) Overlay paper consumption, and (c) Air emissions.	17
56.	Emission test results shall be reported to SWCAA in writing within 45 days of test completion.	1-4, 10-11, 13, 15
57.	Emission monitoring results shall be reported to SWCAA in writing within 15 days of completion.	2-4

### 3. General Provisions

No.	General Provisions
A.	For the purpose of ensuring compliance with this Permit, duly authorized representatives of the Southwest Clean Air Agency must be permitted access to the permittee's premises and the facilities being constructed, owned, operated and/or maintained by the permittee for the purpose of inspecting said facilities. These inspections are required to determine the status of compliance with this Permit and applicable regulations and to perform or require such tests as may be deemed necessary.
B.	The provisions, terms and conditions of this Permit bind the permittee, its officers, directors, agents, servants, employees, successors and assigns, and all persons, firms, and corporations acting under or for the permittee.
C.	The requirements of this Permit survive any transfer of ownership of the source or any portion thereof.
D.	This Permit must be posted conspicuously at or be readily available near the source.
E.	This Permit will be invalid if construction has not commenced within eighteen (18) months from date of issuance, if construction is discontinued for a period of eighteen (18) months or more, or if construction is not completed within a reasonable time.

No.	General Provisions
F.	This Permit does not supersede requirements of other Agencies with jurisdiction and further, this Permit does not relieve the permittee of any requirements of any other governmental Agency. In addition to this Permit, the permittee may be required to obtain permits or approvals from other agencies with jurisdiction.
G.	Compliance with the terms of this Permit does not relieve the permittee from the responsibility of compliance with SWCAA General Regulations for Air Pollution Sources, previously issued Regulatory Orders, RCW 70.94, Title 173 WAC or any other applicable emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply.
H.	If any provision of this Permit is held to be invalid, all unaffected provisions of the Permit will remain in effect and be enforceable.
I.	No change in this Permit will be made or be effective except as may be specifically set forth by written order of the Southwest Clean Air Agency upon written application by the permittee for the relief sought.
J.	The Southwest Clean Air Agency may, in accordance with RCW 70.94 impose such conditions as are reasonably necessary to assure the maintenance of compliance with the terms of this Permit, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act.

**Air Discharge Permit 17-3243 - Appendix A**  
**Emission Testing Requirements**  
**Wellons Fluid Heater / ESP**

**1. Introduction:**

- a. The purpose of this testing is to quantify emissions from the Wellons fluid heater/ESP, and to demonstrate compliance with the requirements of this Permit.
- b. Emission testing shall be conducted for this unit no later than December, 2009. Subsequent emission testing shall be performed a minimum of every five years thereafter, no later than the end of December of the year in which testing is due.
- c. Emission testing shall include, but is not necessarily limited to, the constituents identified in Section 2.a below. A minimum of three test runs, each at least 60 minutes in length, shall be performed for each identified pollutant except for PM. PM test runs shall each be a minimum of 120 minutes in length.
- d. A comprehensive test plan shall be submitted to SWCAA for review and approval ten days prior to each test.
- e. SWCAA personnel shall be informed at least five days prior to testing so that they may be present during testing.

**2. Testing Requirements:**

- |  |                                 |
|--|---------------------------------|
| a. Constituents to be measured:  | Test Methods or Equivalent:     |
| (1) Volumetric flow rate, gas velocity, temperature  | EPA Methods 1 & 2               |
| (2) Oxygen (O <sub>2</sub> ), carbon dioxide (CO <sub>2</sub> ),<br>excess air, dry molecular weight | EPA Method 3                    |
| (3) Particulate matter (PM)  | EPA Method 5, 5B or 17, ODEQ 17 |
| (4) Sulfur dioxide (SO <sub>2</sub> )  | EPA Method 6C                   |
| (5) Oxides of nitrogen (NO <sub>x</sub> )  | EPA Method 7E                   |
| (6) Carbon monoxide (CO)   | EPA Method 10                   |
| (7) Volatile organic compounds (VOCs)  | EPA Method 18 or 25A            |
| (8) Opacity  | EPA Method 9 / SWCAA Method 9   |
- b. Process points to be tested:
- (1) Outlet of the ESP for all constituents.

**Air Discharge Permit 17-3243 - Appendix A**  
**Emission Testing Requirements**  
**Wellons Fluid Heater / ESP**

**3. Source Operation:**

- a. A complete record of production related parameters including process startups, shutdowns, and adjustments shall be kept during emissions testing to correlate operations with emissions, and shall be included with the final test report.
- b. Source operations during the emissions test must be representative of the maximum level of normal operation.

**4. Reporting Requirements:**

- a. All test results shall be corrected to 7% oxygen.
- b. A final emission test report shall be prepared and submitted to SWCAA within 45 calendar days of test completion. Test reports shall be provided in hard copy (paper) and an electronic format acceptable to SWCAA. Each test report shall include, at a minimum, the following information:
  - (1) Description of the source including manufacturer, model number and design capacity of the equipment, and the location of the sample ports or test locations,
  - (2) Time and date of the test and identification and qualifications of the personnel involved,
  - (3) Summary of results, reported in units and averaging periods consistent with the application emissions standard or unit,
  - (4) Summary of control system or equipment operating conditions,
  - (5) Summary of production related parameters,
  - (6) A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation,
  - (7) A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation,
  - (8) Copies of field data and example calculations,
  - (9) Chain of custody information,
  - (10) Calibration documentation,
  - (11) Discussion of any abnormalities associated with the results, and
  - (12) A statement signed by the senior management official of the testing firm certifying the validity of the source test report.

**Air Discharge Permit 17-3243 - Appendix B**  
**Emission Testing Requirements**  
**American Heating Company Fluid Heater**

**1. Introduction:**

- a. The purpose of this testing is to quantify emissions from the American Heating Company fluid heater, and to demonstrate compliance with the requirements of this Permit.
- b. Emission testing shall be conducted for this unit no later than the end of November 2013. Subsequent emission testing shall be performed a minimum of every five years thereafter, no later than the end of November of the year in which testing is due. An alternative schedule may be approved by SWCAA if the permittee makes a written request in advance of the proposed test date. Initial testing for this unit was conducted in November 1998.
- c. Emission testing shall include, but is not necessarily limited to, the constituents identified in Section 2.a below. A minimum of three test runs, each at least 60 minutes in length, shall be performed for each identified pollutant.
- d. A comprehensive test plan shall be submitted to SWCAA for review and approval 10 days prior to each test.
- e. SWCAA personnel shall be informed at least five days prior to testing so that they may be present during testing.

**2. Testing Requirements:**

- |  |                             |
|--|-----------------------------|
| a. Constituents to be measured:                                    | Test Methods or Equivalent: |
| (1) Volumetric flow rate, gas velocity, and temperature            | EPA Methods 1 & 2           |
| (2) Oxygen (O <sub>2</sub> ) and carbon dioxide (CO <sub>2</sub> ) | EPA Method 3A               |
| (3) Exhaust gas moisture content                                   | EPA Method 4                |
| (4) Oxides of nitrogen (NO <sub>x</sub> )                          | EPA Method 7E               |
| (5) Carbon monoxide (CO)   | EPA Method 10               |
| (6) Volatile organic compounds (initial test only)                 | EPA Method 18 or 25A        |
| (7) Opacity  | SWCAA Method 9              |
- b. All constituents shall be tested at the outlet of the fluid heater exhaust stack.

**3. Source Operation:**

- a. A complete record of production related parameters including process startups, shutdowns, and adjustments shall be kept during emissions testing to correlate operations with emissions, and shall be included with the final test report.
- b. Source operations during the emissions test must be representative of the maximum level of normal operation.



**Air Discharge Permit 17-3243 - Appendix B**  
**Emission Testing Requirements**  
**American Heating Company Fluid Heater**

**4. Reporting Requirements:**

- a. All test results shall be corrected to 3% oxygen.
  
- b. A final emission test report shall be prepared and submitted to SWCAA within 45 calendar days of test completion. Test reports shall be provided in hard copy (paper) and an electronic format acceptable to SWCAA. Each test report shall include, at a minimum, the following information:
  - (1) Description of the source including manufacturer, model number and design capacity of the equipment, and the location of the sample ports or test locations,
  - (2) Time and date of the test and identification and qualifications of the personnel involved,
  - (3) Summary of results, reported in units and averaging periods consistent with the application emissions standard or unit,
  - (4) Summary of control system or equipment operating conditions,
  - (5) Summary of production related parameters,
  - (6) A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation,
  - (7) A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation,
  - (8) Copies of field data and example calculations,
  - (9) Chain of custody information,
  - (10) Calibration documentation,
  - (11) Discussion of any abnormalities associated with the results, and
  - (12) A statement signed by the senior management official of the testing firm certifying the validity of the source test report.

**Air Discharge Permit 17-3243 - Appendix C**  
**Emission Testing Requirements**  
**Veneer Dryer Oxidizers**

**1. Introduction:**

The purpose of this testing is to quantify emissions from the veneer dryer oxidizers, and demonstrate compliance with the requirements of this Permit and applicable air quality regulations.

**2. Testing Requirements:**

- a. **Test plan.** A comprehensive test plan shall be submitted to SWCAA for review and approval at least 10 business days prior to each test. SWCAA personnel shall be informed at least five business days prior to testing so that a representative may be present during testing.
- b. **Testing schedule.** The veneer dryer oxidizers shall be emission tested no later than September, 2010. Subsequent emission testing shall be conducted every five (5) years by the end of September of the year in which testing is due.
- c. **Test runs/Reference test methods.** A minimum of three (3) test runs shall be performed for each constituent listed below to ensure the data are representative. Compliance shall be demonstrated by averaging the results of the individual sampling runs. The sampling methods identified below shall be used unless alternate methods are approved in writing by SWCAA in advance of the emission testing.

<u>Constituent</u>	<u>Reference Test Method</u>	<u>Minimum Test Run Duration</u>
Flow rate, temperature	EPA Methods 1 and 2	N/A
O <sub>2</sub> , CO <sub>2</sub> content	EPA Method 3A	60 minutes
Moisture content	EPA Method 4	60 minutes
PM <sub>(total)</sub>	EPA Method 5/202	60 minutes
NO <sub>x</sub>	EPA Method 7E	60 minutes
Opacity	SWCAA Method 9	6 minutes*
CO	EPA Method 10	60 minutes
VOC	EPA Method 25A	60 minutes

- d. **Process points to be tested.** Emission testing shall be conducted at the following emission points:
  - (1) Outlet of each oxidizer for all constituents; and
  - (2) Inlet of each oxidizer for VOC.

**3. Source Operation:**

- a. **Source operations.** Source operations during the emissions test must be representative of maximum intended operating conditions.
- b. **Record of production parameters.** Production related parameters and equipment operating conditions shall be recorded during emissions testing to correlate operating conditions with emissions. Recorded parameters shall, at a minimum, include veneer production, process startups and shutdowns, and plant adjustments. All recorded production parameters shall be documented in the test results report.

**Air Discharge Permit 17-3243 - Appendix C**  
**Emission Testing Requirements**  
**Veneer Dryer Oxidizers**

**4. Reporting Requirements:**

- a. A final emission test report shall be prepared and submitted to SWCAA within 45 calendar days of test completion. Test reports shall be provided in hard copy (paper) and an electronic format acceptable to SWCAA. Each test report shall include, at a minimum, the following information:
- (1) Description of the source including manufacturer, model number and design capacity of the equipment, and the location of the sample ports or test locations,
  - (2) Time and date of the test and identification and qualifications of the personnel involved,
  - (3) Summary of results, reported in units and averaging periods consistent with the application emissions standard or unit,
  - (4) Summary of control system or equipment operating conditions,
  - (5) Summary of production related parameters,
  - (6) A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation,
  - (7) A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation,
  - (8) Copies of field data and example calculations,
  - (9) Chain of custody information,
  - (10) Calibration documentation,
  - (11) Discussion of any abnormalities associated with the results, and
  - (12) A statement signed by the senior management official of the testing firm certifying the validity of the source test report.

**Air Discharge Permit 17-3243 - Appendix D**  
**Emission Monitoring Requirements**  
**Veneer Dryer Oxidizers**

**1. Introduction:**

- a. The purpose of this monitoring is to quantify emissions from the veneer dryer oxidizers is to demonstrate compliance with the requirements of this Permit.

**2. Monitoring Procedure:**

- a. Emission monitoring shall be conducted no later than September, 2006. Subsequent emission monitoring shall be conducted on a 12 month cycle, no later than the end of September of each year. No monitoring is required in years during which emission testing is conducted for the affected unit pursuant to Appendix C of this permit.
- b. Emission monitoring shall be conducted with colormetric sampling tubes. A minimum of 2 samples shall be taken at the exhaust of each oxidizer to determine the emission concentrations of the constituents listed below.

Constituents to be Measured

Carbon Monoxide (CO)

Nitrogen Oxides (NO<sub>x</sub>)

Oxygen (O<sub>2</sub>)

- c. Source operation during monitoring must be representative of maximum intended operating conditions during that year.
- d. Alternative monitoring methodologies may be proposed by the permittee, but such proposals must be approved by SWCAA prior to monitoring.

**3. Minimum Quality Assurance/Quality Control Measures:**

- a. The upper measuring range of the colormetric tubes used for CO and NO<sub>x</sub> monitoring shall be no more than 60 ppmv and 20 ppmv, respectively.
- b. Each sampling shall be separated by a minimum of 15 minutes.
- c. If the monitoring results from any monitoring event indicate that emission concentrations exceed 3 ppmv of NO<sub>x</sub> and/or 30 ppmv of CO, the permittee shall initiate corrective action within 7 days. Corrective action includes tuning, maintenance by service personnel, or any other action taken to maintain compliance with permitted limits. Corrective action shall be pursued until emission concentrations no longer exceed 3 ppmv of NO<sub>x</sub> and/or 30 ppmv of CO. Initiation of corrective action does not shield the permittee from enforcement action.

**Air Discharge Permit 17-3243 - Appendix D**  
**Emission Monitoring Requirements**  
**Veneer Dryer Oxidizers**

**4. Reporting:**

- a. All monitoring results shall be recorded at the facility and reported to SWCAA in writing within 15 calendar days of completion. The following information shall be included in the report:
  - (1) Time and date of the performance monitoring;
  - (2) Identification of the personnel involved;
  - (3) A summary of results, reported in units consistent with the applicable emission standard or limit;
  - (4) A summary of equipment operating conditions;
  - (5) A description of the evaluation methods or procedures used including all field data, quality assurance/quality control procedures and documentation; and
  - (6) Analyzer response check documentation.

**Air Discharge Permit 17-3243 - Appendix E**  
**Emission Testing Requirements**  
**Material Collection Baghouses**

**1. Introduction:**

- a. The purpose of this testing is to quantify emissions from the primary material collection baghouses at this facility, and to demonstrate compliance with the requirements of this Permit.
- b. Emission testing shall be conducted no later than the date listed in the schedule below. Subsequent emission testing for each unit shall be performed on a continuing ten year cycle, no later than the end of the month listed below.

<u>Baghouse</u>	<u>Emission Test Due</u>	<u>Test Month</u>
Baghouse #2	September, 2016	September
Baghouse #3	September, 2016	September
Baghouse #5	December, 2014	December
Baghouse #7	September, 2018	September

- c. Emission testing shall include, but is not necessarily limited to, the constituents identified in Section 2.a below. A minimum of three test runs for at maximum operating conditions for a minimum of one hour shall be performed to establish representativeness of the data.
- d. A comprehensive test plan shall be submitted to SWCAA for review and approval 10 days prior to each test.
- e. SWCAA personnel shall be informed at least five days prior to testing so that they may be present during testing.

**2. Testing Requirements:**

- a. Constituents to be measured: Test Methods or Equivalent:
  - (1) Volumetric flow rate, gas velocity, and temperature EPA Methods 1 & 2
  - (2) Exhaust gas moisture content EPA Method 4
  - (3) Particulate matter (PM) EPA Method 5, 17 or ODEQ 17
  - (4) Opacity SWCAA Method 9
- b. Process points to be tested:
  - (1) Outlet of baghouse for all constituents.

**Air Discharge Permit 17-3243 - Appendix E**  
**Emission Testing Requirements**  
**Material Collection Baghouses**

**3. Source Operation:**

- a. A complete record of production related parameters including process startups, shutdowns, and adjustments shall be kept during emissions testing to correlate operations with emissions, and shall be included with the test results final report.
- b. Source operations during the emissions test must be representative of normal intended operating conditions.

**4. Reporting Requirements:**

- a. A final emission test report shall be prepared and submitted to SWCAA within 45 calendar days of test completion. Test reports shall be provided in hard copy (paper) and an electronic format acceptable to SWCAA. Each test report shall include, at a minimum, the following information:
  - (1) Description of the source including manufacturer, model number and design capacity of the equipment, and the location of the sample ports or test locations,
  - (2) Time and date of the test and identification and qualifications of the personnel involved,
  - (3) Summary of results, reported in units and averaging periods consistent with the application emissions standard or unit,
  - (4) Summary of control system or equipment operating conditions,
  - (5) Summary of production related parameters,
  - (6) A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation,
  - (7) A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation,
  - (8) Copies of field data and example calculations,
  - (9) Chain of custody information,
  - (10) Calibration documentation,
  - (11) Discussion of any abnormalities associated with the results, and
  - (12) A statement signed by the senior management official of the testing firm certifying the validity of the source test report.

**Air Discharge Permit 17-3243 - Appendix F  
Alternative Monitoring Schedule  
American Heating Company Fluid Heater**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

OCT 16 1997

Reply To  
Attn Of: OAQ-107

Ms. Jennifer E. Brown  
Southwest Air Pollution Control Authority  
1308 NE 134th Street  
Olympia, WA 98685-2747

Re: Variance Request for Daily Logging of Fuel for Natural Gas Boiler

Dear Ms. Brown:

This letter responds to your June 23, 1997, request for an alternative fuel monitoring schedule for the Hardel Mutual Plywood Corporation facility in Chehalis, Washington and applies to the 14.7 MM Btu/hr American Heating Company thermal fluid heater. Paragraph (g) of 40 CFR 60.48c (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) requires the amount of fuel combusted each day to be recorded.

Authorization has been delegated to the Environmental Protection Agency (EPA) regional offices to approve alternative recording frequencies for New Source Performance Standards (NSPS) Subpart Dc on a case-by-case basis. EPA Region 10 hereby approves the customized fuel monitoring for the boiler listed above according to the attached requirements.

The attached custom fuel monitoring schedule for natural gas combustion does not alter any of the other requirements of NSPS Subparts A and Dc which may apply to the facility. All reports should be addressed to this office. If you have any questions regarding this alternate monitoring schedule, please call Kory Tonouchi of my staff at (206) 553-6908.

Sincerely,

A handwritten signature in black ink, appearing to read "Bonnie Thie".

Bonnie Thie, Manager  
Alaska-Washington Air Unit  
Office of Air Quality

Enclosure

cc. Mr. Warren Krug  
Environmental and Safety Manager  
Hardel Mutual Plywood Corporation  
1515 West Bay Drive  
Olympia, Washington 98504

RECEIVED  
OCT 20 1997

SOUTHWEST AIR POLLUTION  
CONTROL AUTHORITY



**Air Discharge Permit 17-3243 - Appendix F  
Alternative Monitoring Schedule  
American Heating Company Fluid Heater**

**U.S. Environmental Protection Agency Region 10  
Alternative Monitoring Plan Requirements**

Applicability

This alternative monitoring schedule applies to the Small Industrial-Commercial-Institutional Steam Generating Unit operated by Hardel Mutual Plywood Corporation in Chehalis, Washington.

This alternative monitoring plan applies to the above noted facilities only during use of pipeline quality natural gas and does not alter any of the other requirements of NSPS Subparts A and Dc which may apply to the facility.

Monitoring Frequency

Hardel Mutual Plywood Corporation shall monitor the amount of the natural gas usage monthly.

Record keeping

Hardel Mutual Plywood Corporation shall maintain records of all monitoring data.

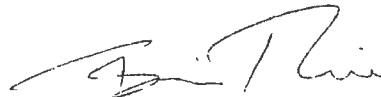
Hardel Mutual Plywood Corporation shall maintain a record of all periods of operation on fuels other than pipeline quality natural gas.

All records shall be maintained on-site for a period of 5 years from the generation of such record.

Reporting

Hardel Mutual Plywood Corporation shall report use of any fuel other than pipeline quality natural gas within 60 days of such use.

Approved this 15<sup>th</sup> day of Oct, 1997.



Bonnie Thie, Manager  
Alaska-Washington Air Unit  
Office of Air Quality

**Air Discharge Permit 17-3243 - Appendix G**  
**Emission Monitoring Requirements**  
**American Heating Company Fluid Heater**

**1. Introduction:**

- a. The purpose of periodically monitoring performance of the American Heating Company fluid heater is to minimize emissions and provide a reasonable assurance that the fluid heater is operating properly.
- b. Periodic monitoring may be conducted with an electrochemical cell combustion analyzer, analyzers used for reference method testing, or other analyzers pre-approved by SWCAA.

**2. Monitoring Procedure:**

- a. Monitoring of fluid heater exhaust gases to determine emission concentrations of the constituents listed below shall be conducted annually, no later than the end of November of each year. Monitoring is not required in any year that formal emission testing is conducted pursuant to Appendix B of this permit. All emission monitoring shall be conducted in accordance with Appendix G of this permit. An alternate monitoring schedule may be implemented if approved in writing by SWCAA.

Constituents to be Measured

Carbon Monoxide (CO)

Nitrogen Oxides (NO<sub>x</sub>)

Oxygen (O<sub>2</sub>)

- b. Source operation during monitoring must be representative of maximum intended operating conditions during that year.
- c. Alternative testing methodologies must be pre-approved by SWCAA.

**3. Minimum Quality Assurance/Quality Control Measures:**

- a. The analyzer(s) response to span gas of a known concentration shall be determined before and after testing. No more than 12 hours may elapse between span gas response checks. The results of the analyzer response shall not be valid if the difference between the pre and post response check results vary by more than 10% of the initial span gas value.
- b. The CO and NO<sub>x</sub> span gas concentrations shall be no less than 50% and no more than 200% of the emission concentration corresponding to the permitted emission limit. A lower concentration span gas may be used if it is more representative of measured concentrations. Ambient air may be used to zero the CO and NO<sub>x</sub> cells/analyzer(s) and span the oxygen cell/analyzer.
- c. Sampling shall consist of at least 1 test consisting of at least 5 minutes of data collection. Data shall not be collected until after analyzer readings have stabilized (less than 5% per minute change in emission concentration). Emission concentrations shall be recorded at least once every 30 seconds during the data collection phase for a minimum of 10 readings. All test data collected following the ramp-up phase(s) shall be reported to SWCAA in the designated format.

**Air Discharge Permit 17-3243 - Appendix G**  
**Emission Monitoring Requirements**  
**American Heating Company Fluid Heater**

**3. Minimum Quality Assurance/Quality Control Measures (continued):**

- d. If the monitoring results from any monitoring event indicate that emission concentrations exceed applicable permit limits (Requirement #3), the permittee shall either perform 60 minutes of additional monitoring to more accurately quantify CO and NO<sub>x</sub> emissions, or initiate corrective action. Additional monitoring or corrective action shall be initiated as soon as practical but no later than three days after the exceedance is identified. Corrective action includes tuning, maintenance by service personnel, limitation of unit load, or other action taken to maintain compliance with permitted limits. Monitoring of unit emissions must be conducted within three days following completion of any corrective action to confirm that the corrective action has been effective.

**4. Reporting:**

- a. All monitoring results shall be recorded at the facility and reported to SWCAA in writing using a format designated by the Agency. Results shall be reported within 15 calendar days of monitoring completion. At a minimum, the following information shall be included in the report:
  - (1) Time and date of the performance monitoring;
  - (2) Identification of the personnel involved;
  - (3) Identification of the affected unit;
  - (4) A summary of results (NO<sub>x</sub>, CO, O<sub>2</sub>, etc), reported in units consistent with the applicable emission standard or limit;
  - (5) A summary of equipment operating conditions (e.g., firing rate, fuel flow, stack temperature, etc);
  - (6) A description of the evaluation methods or procedures used including all field data, quality assurance/quality control procedures and documentation; and
  - (7) Analyzer response check documentation.
- b. Individual monitoring results shall be reported as read. Final average monitoring results shall be reported corrected to 3% O<sub>2</sub> and adjusted to reflect analyzer response to the zero and span gases (bias/drift adjustment).