

Hampton Lumber Mills, Washington Inc.

Randle Facility

FINAL Title V Basis Statement

Southwest Clean Air Agency
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PERMIT #: SW97-4-R2

FINAL ISSUED: December 15, 2010

PREPARED FOR: Hampton Lumber Mills, Washington Inc.
Randle Facility
10166 US Hwy 12
Randle, WA 98377

PLANT SITE: Randle Facility
10166 US Hwy 12
Randle, WA 98377

PERMIT ENGINEER: Vannessa McClelland, Air Quality Engineer

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I. GENERAL INFORMATION AND CERTIFICATION

1. Company Name: Hampton Lumber Mills, Washington Inc.
2. Facility Name: Hampton Lumber Mills, Washington Inc.
– Randle Facility
3. Responsible Official: Ken Rankin, Randle Mill Manager
4. Facility Contact Person: Dale Scheirbeck / Ken Rankin
5. Unified Business Identification Number: 219-001-738
6. SIC Code/NAICS Number: 2421/321113

7. Basis for Title V Applicability:

Hampton Lumber Mills, Washington Inc. - Randle facility (Hampton Lumber Randle) has actual emissions in excess of 100 tpy of nitrogen oxides, carbon monoxide and volatile organic compounds which are regulated criteria pollutants under the Federal Clean Air Act. The facility also emits more than 10 tons per year of acetaldehyde and methanol, and over 25 tons per year of all hazardous air pollutants combined.

The maximum facilitywide potential to emit (PTE) of these air pollutants has been determined below:

Pollutant	PTE (tpy)
NO _x	108.70
CO	181.32
VOC	161.20
SO ₂	18.06
PM	77.63
PM ₁₀	55.37
PM _{2.5}	30.80
Acetaldehyde	15.12
Methanol	15.70
All HAPs	47.68

8. Current Permitting Action:

This is a renewal Title V Permit.

9. Attainment Area:

Hampton Lumber Randle is located in an area which is in attainment for all criteria pollutants.

10. Facility Description:

Hampton Lumber Randle is a manufacturer of finished dimensional lumber products primarily for the construction industry.

Hampton Lumber Randle has a sawmill located at 10166 US Highway 12 in Randle, Lewis County, Washington. The products manufactured by Hampton Lumber Randle are primarily used in the construction industry. Dimensional lumber produced at the Randle facility is shipped both kiln dried and green. The green lumber is treated with anti-stain. The equipment includes a Wellons hog fuel boiler, bunkers, dry kilns, pneumatic conveyors, plant vehicle traffic, and debarking and saw equipment. Hampton Lumber Randle's equipment is divided into five emission units designated as EU-1 through EU-5. All emission units are either directly or indirectly involved in lumber production.

Hampton Lumber Mills typically operates two shifts per day at the sawmill and planer mill. Occasionally this schedule is extended to a third shift when demand is exceptionally high. Days of operation range from five to six days per week, depending on seasonal demand and delivery schedules. The process boiler and dry kilns operate twenty-four hours per day, seven days per week.

11. SWCAA Air Discharge Permits:

The following table lists each Air Discharge Permit issued for this facility. Permits in bold contain no active requirements. The requirements may have been superseded, may have been of limited duration, or the equipment may have been removed.

Permit	Permit Application	Date Issued	Description
77-204	L-89	October 26, 1977	Approved installation of a baghouse filtration system in the sawmill. This Permit was superseded by SWCAA 02-2414.
78-338	L-94	May 4, 1978	Approved installation of a wet scrubber for the boiler. This Permit was superseded by SWCAA 97-2033.
78-380 and 78-381		August 29, 1978	Order of Consent to discontinue the use of the wood waste incinerator. Closed.
88-1033	L-180	January 16, 1989	Approved installation of a new planer and baghouse for the sawmill. This Permit was superseded by SWCAA 96-1962.
90-1209	L-223	May 21, 1990	Approved installation of a small log processing system and other lumber production equipment for the sawmill. This Permit was superseded by SWCAA 96-1962.
91-1342	L-254	June 24, 1991	Approved a new chipper, bucksaw and associated equipment for the sawmill. This Permit was superseded by SWCAA 06-2691.
93-1495	L-291	July 12, 1993	Approved installation of a new fingerjointer and baghouse for Remanufacturing Plant #1. This Permit was superseded by SWCAA 94-1608.

94-1608	L-251, L-293, L-304	May 16, 1994	Approved expansion of Remanufacturing Plant #1 and installation of Remanufacturing Plant #2. New control equipment includes a Carter-Day baghouse in Remanufacturing Plant #1 and a new H&R Mechanical Systems baghouse in Remanufacturing Plant #2. This Permit was superseded by SWCAA 96-1962 with the exception of the VOC limit. This Permit was entirely superseded by SWCAA 01-2399.
95-1835	L-290	December 13, 1995	Approved installation of new knock-out boxes for the filing room. This Permit was superseded by SWCAA 96-1962.
96-1953	L-371	December 2, 1996	Approved the installation of one new dry kiln and four new vent changers. This Permit was superseded by SWCAA 02-2414.
96-1962	L-340	January 1, 1992	Approved modification of existing PM emissions limits for the baghouses, sawdust cyclones, and knock-out boxes. This Permit superseded SWCAA 88-1033, 90-1209, 93-1495, 94-1608, and 95-1835. This Permit was superseded by SWCAA 01-2399.
97-2033	L-385	September 5, 1997	Approved modifications of existing emissions limits for the wood fired boiler. This Permit superseded SWCAA 78-338. This Permit was superseded by SWCAA 02-2414.
00-2263	L-456	April 19, 2000	Approved installation of a new Spray Technologies sap stain spray system. This Permit was superseded by SWCAA 06-2691.
01-2399	L-487	December 17, 2001	Removed requirements for equipment that is no longer at the facility. This Permit superseded SWCAA 94-1608 and 96-1962. This Permit was superseded by SWCAA 06-2691.
02-2414	L-440	June 17, 2002	Modification of existing requirements and scrubber flow. This Permit superseded SWCAA 77-204, 96-1953, and 97-2033. This Permit was superseded by SWCAA 06-2691.
06-2691	L-577	October 8, 2006	Replacement of the hog fuel boiler and wet scrubber with a new hog fuel boiler, ESP and SNCR and the installation of four new dry kilns. This Permit superseded SWCAA 91-1342, 00-2263, 01-2399, and 02-2414. This permit was superseded by 06-2691R1.
08-2801		August 12, 2008	Consent Order for spiking CO emissions. Closed.
06-2691R1	L-607	July 20, 2010	Modification of existing requirements to the boiler operation temperature, gaseous emissions averaging times, bin unloading throughput calculations, and dry kiln emission factors.

II. EMISSION UNIT IDENTIFICATION

ID #	Generating Equipment/Activity	Emission Control
EU-1	Log Yard	Wet suppression/water truck/street sweeper
EU-2	Sawmill - Planer, Bunkers, Filing Room	Total enclosure, cyclone (Sutorbilt), baghouse (Clarke's Sheet Metal, Inc), partial enclosure/wind screens/wet suppression, knock-out boxes
EU-3	Wellons Hog Fuel Boiler	One multiclone followed by a two-field ESP and SNCR
EU-4	Dry Kilns	Process temperature limit
EU-5	Anti-Stain Treatment	Mist eliminator

EU-1 Log Yard

The log yard consists of all outdoor areas on the south side of the facility used for the handling and storage of raw logs. Raw logs are received by trucks, and stacked until needed for the sawmill. Access roads to the log yard from US Highway 12 are completely paved, but the yard area itself is packed earth. Haul road and fugitive dust emissions are controlled by water suppression and a street sweeper as necessary to minimize emissions.

The following individual pieces of equipment are associated with EU-1:

Equipment

- One water truck
- One sweeper truck
- Various log trucks
- Various log loaders and transports

EU-2 Saw and Planer Mills

The sawmill consists of an enclosed building and associated equipment used to produce green dimensional lumber. The sawmill is arranged in a linear configuration. Raw logs are debarked and sent through the merchandizer. Associated equipment is outside but equipped with sawdust guards to reduce fugitive emissions. The remaining equipment for the sawmill is enclosed within a building. Processed logs are then cut down to standard dimensional lumber sizes through various stages of trimming, edging, and resawing. Green sawdust from sawing operations is collected by drag chains, and pneumatically conveyed to exterior storage bins by the Sutorbilt sawdust cyclone.

In the planer mill the boards are trimmed prior to the planer and the trim blocks are sent to the chipper. Selected pieces of equipment, such as the planers and the fractionator, are connected to the Clarke's Sheet Metal, Inc. "Pneu-Aire" baghouse and cyclone in series.

Emissions consist of fugitive particulate matter emissions from process operations as well as non-fugitive particulate matter emissions from the Clarke's Sheet Metal cyclone and baghouse. Particulate matter collected in the Clarke's Sheet Metal cyclone and baghouse is reduced in size by the fractionating system and eventually conveyed to storage bins. Bark and other streams of byproduct material are conveyed to a hogger unit and stored in an exterior bin. Other streams of unusable wood are mechanically conveyed to multiple chippers. Wood chips are mechanically conveyed to exterior storage bins prior to shipment off site.

The filing room consists of an enclosed building and associated equipment used to sharpen and maintain saw blades and other cutting equipment used at the facility. Metal shavings from grinding and sharpening operations are controlled with two knock-out boxes which exhaust to the ambient atmosphere. Collected metal shavings are stored in barrels prior to disposal.

The following individual pieces of equipment are associated with EU-2:

Equipment

- Two bucksaws
- One debarker
- One Stenner saw
- One fuel hog
- Three chippers
- Various conveyors
- Various chop saws, trim saws
- Various edgers
- Five chip bins
- One shavings bin
- One sawdust bin
- One hog fuel bin
- One planer
- One fractionator
- One Western Pneumatics 7' cyclone rated at 10,000 cfm (Fractionator Cyclone)
- One Sutorbilt green sawdust cyclone rated at 1,630 acfm (Sawdust Cyclone)
- One Clarke's Sheet Metal "Pneu-Aire" cyclone/baghouse combination (Baghouse #1) rated at 42,200 acfm, model 100-20-G2
- Various grinders
- Various files
- Two knock-out boxes with a combined airflow of 3,960 dscfm

EU-3 Hog Fuel Boiler

The Wellons Inc. hog fuel boiler was manufactured in 2006. The boiler is used to generate steam for the lumber dry kilns on-site and is fired solely on wood byproducts from facility operations with the potential to buy additional hog fuel from other facilities on an as-needed basis. Most of the boiler's fuel is hog fuel from the sawmill. However,

chips, planer shavings, sawdust, and scrap wood are all fired in the boiler depending on required fuel characteristics. Exhaust from the boiler's furnace passes through a selective noncatalytic reduction (SNCR) system to reduce oxides of nitrogen (NO_x) concentrations and then through a multiclone followed by a two-field ESP to remove particulate matter (PM).

The Wellons hog fuel boiler is subject to the NSPS standard 40 CFR 60.40b *et seq.* (Subpart Db) "Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units" for units greater than 100 MMBtu/hr.

Opacity, NO_x and CO emissions are continuously monitored using continuous emission/opacity monitors.

The following individual pieces of equipment are associated with EU-3:

Equipment

- Wellons hog fuel boiler, model 2D2C9.0A, serial #2606-0501, rated at 120,000 pounds of saturated steam per hour and 164.9 MMBtu with an airflow of 78,090 acfm (approximately 44,000 dscfm). The unit has water cooled grates, where the water from the grates pre-heats the incoming water to the boiler and a heat exchange to pre-heat incoming boiler combustion air. The exhaust stack is 80 feet 5 13/16 inches tall with a diameter of 7 feet 1/8 inches.
- One SNCR system to reduce post combustion NO_x concentrations using urea. The unit can achieve a control efficiency of approximately 50%. The system includes a urea tank, approximately 6,100 gallons in capacity, with redundant urea and water pumps rated at 18 gpm.
- One multiclone and one two-field ESP model number 2W-092-2922, serial number B2606-2425 in series to reduce PM emissions.

Wellons has a guaranteed emission level of 90 ppm for NO_x, 225 ppm for CO, 0.01 gr/dscf for PM, and 25 ppm for urea corrected to 7% O₂.

EU-4 Dry Kilns

Eight dry kilns are used to dry green lumber from the sawmill. The kilns are powered exclusively with steam from the facility's hog fuel boiler. Rough sawn lumber, almost exclusively Douglas fir and hemlock, but also minor amounts of pine, spruce and other woods, is stacked on carts and rolled into the kilns. After drying, lumber is removed from the kilns and sent to the planer.

The following individual pieces of equipment are associated with EU-4:

Equipment

- Four American Wood Dryers, Inc. model 1156 steam heated dry kilns with added heat exchangers.
- Four Wellons, Inc. steam heated dry kilns, 104 foot double track kilns. These kilns hold approximately 50 MMBF/yr each, totaling 200 MMBF/yr.

EU-5 Anti-Stain System

Spray Technologies anti-stain/sap stain spray system, including a Spray Technologies Linear SS 100 spray booth with an airflow of 500 acfm and a Spray Technologies model CT-12012 mist eliminator. Emissions from the spray enclosure are collected and vented to the mist eliminator. The mist eliminator consists of internal baffles that collect the anti-stain droplets and route them back into circulation. The mist eliminator is estimated to eliminate 98% of all spray particles 12 microns or larger. The current anti-stain is Kop-Coat Bazooka®.

The following individual pieces of equipment are associated with EU-5:

Equipment

Spray Technologies sap stain spray system, including a Spray Technologies Linear SS 100 spray booth with an airflow of 500 acfm and a Spray Technologies model CT-12012 mist eliminator.

III. EXPLANATION OF INSIGNIFICANT EMISSION UNIT DETERMINATIONS

Each emission unit listed as insignificant in the permit application has been reviewed by SWCAA to confirm its status. Emission units determined to be insignificant by SWCAA are described as follows:

IEU-1 Welding WAC 173-401-532(12)

The permittee performs a variety of maintenance and repair activities on-site that involve metal fabrication and welding. These activities consume far less than one ton of welding rod per day, and are deemed insignificant in accordance with WAC 173-401-532(12).

IEU-2 Debarker and Hog WAC 173-401-532(112 and 113)

The permittee performs chipping and debarking activities on raw timber. These activities are deemed insignificant in accordance with WAC 173-401-532(112 and 113).

IV. EXPLANATION OF SELECTED PERMIT PROVISIONS AND GENERAL TERMS AND CONDITIONS**P12. Excess Emissions**

[SWCAA 400-107, WAC 173-400-107]

WAC 173-400-107 and SWCAA 400-107 establish criteria and procedures for determining when excess emissions are considered unavoidable. Emissions that meet the requirements to be classified as unavoidable are still considered excess emissions and are reportable but are excused and not subject to penalty. Notification of excess emissions is required as soon as possible and shall occur by the next business day following the excess emissions event. Excess emissions due to start up or shutdown conditions are considered

unavoidable if the permittee adequately demonstrates the excess emissions could not have been prevented through careful planning and design. Upset excess emissions are considered unavoidable if the permittee adequately demonstrates the upset event was not caused by poor or inadequate design, operation, maintenance, or other reasonably preventable condition, and the permittee takes appropriate corrective action that minimizes emissions during the event, taking into account the total emissions impact of that corrective action.

In accordance with SWCAA 400-070(2), visible emissions from the hog fuel boiler may exceed the operational opacity limit of 10% and the general standard of 20% during periods of soot blowing and/or grate cleaning. These periods are limited to not more than 15 minutes once in any 8 consecutive hours. A grate cleaning schedule is required to be submitted to SWCAA annually.

SWCAA 400-040(1)(a) approves the soot blowing and grate cleaning as necessary to the proper and efficient operation of the boiler facilities. This practice, except for testing and trouble shooting, is to be scheduled for the same approximate times each day and the Agency shall be advised of the schedule.

G10. Portable Sources

[SWCAA 400-110(6), WAC 173-400-110(9)]

WAC 173-400-110(5) in the SIP (replaced in the State only rules by WAC 173-400-035) and SWCAA 400-110(6) establish procedures for approving the operation of portable sources of air emissions that locate temporarily at project sites. These requirements are general statewide standards, and apply to all portable sources of air contaminants. Common equipment subject to these conditions include emergency generators, engine-powered pumps, rock crushers, concrete batch plants, and hot mix asphalt plants that operate for a short time period at a site to fulfill the needs of a specific contract. Portable sources exempt from registration under SWCAA 400-101 are exempt from SWCAA 400-110 and not subject to the portable sources requirements. Among those categories listed in SWCAA 400-101 that are exempt, are operations with potential to emit less than 1 ton/yr of all criteria pollutants plus volatile organic compounds, combined.

V. EXPLANATION OF OPERATING TERMS AND CONDITIONS

Reqs. 1-8 General Standards for Maximum Emissions

[WAC 173-400-040, SWCAA 400-040]

WAC 173-400-040 and SWCAA 400-040 establish maximum emission standards for various air contaminants. These requirements apply to all emission units at the source, both EU and IEU. Pursuant to WAC 401-530(2)(c), the permit does not contain any testing, monitoring, recordkeeping, or reporting requirements for IEUs except those specifically identified by the underlying requirements.

Req. 7 prohibits any concealment or masking. At present, the permittee does not operate any equipment capable of masking emissions, therefore monitoring is limited to the semi-annual compliance certification.

Req. 9 Emission Standards for Combustion and Incineration Units

[WAC 173-400-050, SWCAA 400-050]

WAC 173-400-050 and SWCAA 400-050 establish maximum emission standards for selected emissions from combustion and incineration units. These requirements apply to all combustion and incineration units at the source, both EUs and IEUs. Pursuant to WAC 401-530(2)(c), the permit does not contain any testing, monitoring, recordkeeping, or reporting requirements for IEUs except those specifically identified by the underlying requirements.

Req. 10 Emission Standards for General Process Units

[WAC 173-400-060, SWCAA 400-060]

WAC 173-400-060 and SWCAA 400-060 establish maximum particulate matter emission standards for general process units. These requirements apply to all general process units at the source, both EUs and IEUs. Pursuant to WAC 401-530(2)(c), the permit does not contain any testing, monitoring, recordkeeping, or reporting requirements for IEUs except those specifically identified by the underlying requirements.

Req. 11-30 Air Discharge Permit for Correction of Erroneously Established Permit Limit

[SWCAA 06-2691R1]

Air Discharge Permit 06-2691R1, issued for Permit application L-607 on July 20, 2010, modified the boiler temperature monitoring requirements, modified the gaseous emissions averaging times, updated the dry kiln emission factors, and updated the bin unloading throughput. This is the only valid Air Discharge Permit for the facility.

Req-11 limits emissions from the Wellons hog fuel boiler to the following:

NO _x	108.70 tpy, 90 ppmvd (24-hr avg)
CO	181.32 tpy, 225 ppmvd (24-hr avg)
PM/PM ₁₀	14.45 tpy, 0.01 gr/dscf (1-hr avg) (filterable only)
Ammonia	15.00 tpy, 25 ppm (24-hr avg)
Acetaldehyde	0.12 tpy
Acrolein	0.02 tpy
Formaldehyde	1.24 tpy

The limits are established based on manufacturer's guarantees.

Req-12 limits emissions from the lumber drying operations to the following:

VOC	135.00 tpy
PM/PM ₁₀	6.80 tpy
Acetaldehyde	15.00 tpy
Acrolein	0.25 tpy
Formaldehyde	0.35 tpy
Methanol	15.70 tpy

The limits are established based on actual type and quantity of lumber dried and emission factors.

Req-13 limits emissions from Baghouse #1 to the following:

PM/PM ₁₀ /PM _{2.5}	7.92 tpy, 0.005 gr/dscf (1-hr avg)
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Req-14 limits emissions from the Sawdust Cyclone to the following:

PM/PM ₁₀	1.84 tpy, 0.030 gr/dscf (1-hr avg)
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Req-15 limits emissions from the knock-out boxes to the following:

PM/PM ₁₀	1.86 tpy, 0.010 gr/dscf (1-hr avg)
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Req-16 limits emissions from the bin unloading operations to the following:

PM	30.43 tpy
PM ₁₀	18.09 tpy
PM _{2.5}	7.00 tpy

Req-17 limits emissions from anti-stain to the following:

VOC	4.74 tpy
Dipropylene glycol methyl ether	1.73 tpy

Req-18 limits opacity from the Wellons hog fuel boiler to ten percent. This limit was set as part of the BACT evaluation of this source. Data from the boiler source tests has shown that while under proper operation the opacity can be maintained at 10% or below (not to be exceeded for more than 3 minutes in any one hour).

Req-19 limits opacity from dry kilns to five percent. This limit was set as part of the BACT evaluation of this source. The dry kilns have indicated that while under proper operation the opacity can be maintained at 5% or below (not to be exceeded for more than 3 minutes in any one hour).

Req-20 limits opacity from sawmill operations to zero percent. This limit was set as part of the BACT evaluation of this source. In SWCAA's experience, enclosed sawmill operations of green lumber can easily meet the 0% opacity limit (not to be exceeded for more than 3 minutes in any one hour).

Req-21 requires operations that cause or contribute to a nuisance odor to use recognized good practice and procedures to reduce these odors to a reasonable minimum.

Req-22 requires each pollution control device shall be operated whenever the processing equipment served by that control device is in operation with the exception of the ESP and SNCR during hog fuel boiler start ups.

Req-23 requires exhaust gasses to discharge vertically without any device to obstruct vertical dispersion.

Req-24 requires the Wellons hog fuel boiler to only be fired on wood products. The Permittee shall employ work practices to assure only clean fuel is combusted in the hog fuel boiler, because experience shows rocks, dirt and other detritus within the fuel can cause clinker production.

Req-25 requires the Wellons hog fuel boiler to be equipped with a flow meter capable of monitoring the urea usage of the SNCR system.

Req-26 requires that Baghouse #1 be equipped with a differential pressure gauge to indicate the pressure differential across the filtering media. The pressure drop across filtration media can be used to gauge baghouse performance and determine the baghouse bag cleaning/replacement schedule. SWCAA uses this data to assess system performance during inspections.

Req-27 limits the lumber approved for drying in the kilns to Douglas fir, western hemlock, Sitka spruce, Engelmann spruce, lodgepole pine, alpine fir, grand fir, silver fir and noble fir. Lumber made of other wood species may be dried provided that the following information is furnished to SWCAA for review prior to the start of drying operations:

- (a) Identification of the wood species to be dried;
- (b) Emission factors for the specified wood species; and
- (c) Expected quantity of lumber of that species to be dried.

Req-28 limits the maximum set point temperature of lumber drying to 200 °F. Studies have shown a significant increase in VOC and some HAP emissions when lumber drying exceeds 200 °F. SWCAA acknowledges that at times the actual temperature will exceed the set point temperature and that this is natural for the nature of the equipment.

Req-29 requires the dry kiln doors to be kept closed at all times during active drying operations.

Req-30 requires wet suppression on the shavings transfer bunkers to be operated at all times during active transfer operations to reduce fugitive particulate emissions.

Req-31 requires all VOC containing materials to be collected in an enclosed container and not allowed to evaporate.

Req-32 and 33 requires a street sweeper to be used weekly on paved roads when significant rainfall has not occurred for 15 days or more and a watering truck to be used daily on unpaved roads daily when significant rainfall has not occurred for 15 days or more to minimize fugitive dust.

Req-34 requires periods of start up and shutdown to be limited to a six-hour period. During start up and shutdown, emissions of NO_x, CO and PM₁₀ may exceed the short-term emission limit.

Req-35 requires periods of start up and shutdown following refractory work to be limited to a 36-hour period. Following refractory work, the start up period is extended to include curing of the refractory.

VI. EXPLANATION OF OBSOLETE AND FUTURE REQUIREMENTS

1. Obsolete Air Discharge Permits

SWCAA has issued a total of seventeen Air Discharge Permits (Orders of Approval) for Hampton Lumber Randle. As identified in Section V, only one of these Permits is still active. The approval conditions in the remaining Permits have been superseded or have become obsolete as described below.

ADP SWCAA 77-204 was issued October 26, 1977 for ADP application L-89. SWCAA 77-204 approved installation of a baghouse filtration system in the Sawmill (EU-2). A visible emission limit of 0% opacity was established for approved operations. SWCAA 77-204 was superseded by SWCAA 02-2414.

ADP SWCAA 78-338 was issued May 4, 1978 for ADP application L-94. SWCAA 78-338 approved installation of a wet scrubber for control of particulate matter emissions from the Power House (EU-3). SWCAA 78-338 was superseded by SWCAA 97-2033.

ADP SWCAA 78-380 was issued August 29, 1978. SWCAA 78-380 required the Permittee to discontinue use of the wood waste incinerator at the Randle facility by June 30, 1979. The permittee complied with the requirements of this ADP in a timely fashion. SWCAA's inspection on April 27, 1983 confirmed that the wood waste incinerator had been dismantled and removed from the facility.

ADP SWCAA 88-1033 was issued January 16, 1989 for ADP application L-180. SWCAA 88-1033 approved installation of a new planer and baghouse for the Sawmill (EU-2). SWCAA 88-1033 was superseded by SWCAA 96-1962.

ADP SWCAA 90-1209 was issued May 21, 1990 for ADP application L-223. SWCAA 90-1209 approved installation of a small log processing system and other lumber production equipment for the Sawmill (EU-2). SWCAA 90-1209 was superseded by SWCAA 96-1962.

ADP SWCAA 93-1495 was issued July 12, 1993 for ADP application L-291. SWCAA 93-1495 approved installation of a new fingerjointer and baghouse for Remanufacturing Plant #1. SWCAA 93-1495 was superseded by SWCAA 94-1608.

ADP SWCAA 94-1608 was issued May 16, 1994 for ADP applications L-251, L-293, and L-304. SWCAA 94-1608 approved expansion of Remanufacturing Plant #1 and installation of Remanufacturing Plant #2. SWCAA 94-1608 established emission limits for both particulate matter and VOC emissions. SWCAA 94-1608 was superseded by SWCAA 96-1962 with the exception of the VOC limit. SWCAA 94-1608 was entirely superseded by SWCAA 01-2399.

ADP SWCAA 95-1835 was issued December 13, 1995 for ADP application L-290. SWCAA 95-1835 approved installation of new knock-out boxes for the filing room (EU-2). SWCAA 95-1835 was superseded by SWCAA 96-1962.

ADP SWCAA 96-1953 was issued December 2, 1996 for ADP application L-371. SWCAA 96-1953 approved installation of one new dry kiln and four new vent heat exchangers at the Randle facility (EU-4). SWCAA 96-1953 established emission limits for both particulate matter and VOC emissions from dry kilns. SWCAA 96-1953 was superseded by SWCAA 02-2414.

ADP SWCAA 96-1962 was issued January 2, 1996 for ADP application L-340. SWCAA 96-1962 approved modification of existing particulate matter emission limits for the baghouses, sawdust cyclone, and knock-out boxes (EU-2). Prior to the issuance of SWCAA 96-1962, approval conditions for particulate matter control equipment at the Randle facility were drawn from five different ADPs. Each ADP had a different schedule for emission testing, and in some cases a different exhaust concentration limit. The permittee requested that all of the particulate matter control equipment be given a consistent set of approval conditions and a facilitywide testing schedule. SWCAA 96-1962 standardized emissions testing requirements for all baghouses, cyclones, and knock-out boxes at the Randle facility and established other requirements. SWCAA 96-1962 was superseded by SWCAA 01-2339.

ADP SWCAA 97-2033 was issued September 5, 1997 for ADP application L-385. SWCAA 97-2033 approved modification of existing emission limits for the hog fuel boiler at the Randle facility (EU-3). SWCAA 97-2033 established requirements for the boiler and control equipment. SWCAA 97-2033 was superseded by SWCAA 02-2414.

ADP SWCAA 00-2263 was issued April 19, 2000 for ADP application L-456. SWCAA 00-2263 approved the installation of a new Spray Technologies sap stain spray system (EU-5). SWCAA 00-2263 was superseded by SWCAA 06-2691.

ADP SWCAA 01-2399 was issued December 17, 2001 for ADP application L-487. SWCAA 01-2399 removed the requirements for equipment that was no longer at the facility. SWCAA 01-2399 was superseded by SWCAA 06-2691.

ADP SWCAA 02-2414 was issued June 17, 2002 for ADP application L-440. SWCAA 02-2414 modified existing requirements and the scrubber flow. SWCAA 02-2414 was superseded by SWCAA 06-2691.

ADP SWCAA 06-2691 was issued October 8, 2006 for ADP application L-577. SWCAA 06-2691 approved the replacement of the hog fuel boiler and wet scrubber with a new hog fuel boiler, ESP and SNCR and the installation of four new dry kilns. SWCAA 06-2691 was superseded by SWCAA 06-2691R1.

Consent Order 08-2801 was issued August 12, 2008. SWCAA 97-2033 addressed spiking CO issues within the hog fuel boiler.

ADP SWCAA 06-2691R1 was issued July 20, 2010 for ADP application L-607. SWCAA 06-2691R1 approved modification of the averaging times for gaseous emissions, modified boiler temperature monitoring requirements, updated dry kiln emission factors, and updated bin unloading throughputs.

2. Non-Applicable Requirements

Under the authority of section 112(r) of the Clean Air Act, the Chemical Accident Prevention Provisions require facilities that produce, handle, process, distribute, or store certain chemicals to develop a Risk Management Program, prepare a Risk Management Plan (RMP), and submit the RMP to EPA. Covered facilities were initially required to comply with the rule in 1999, and the rule has been amended on several occasions since then, most recently in 2004. The facility does not produce, handle, process, distribute, or store the chemicals listed in 40 CFR 68.130.

3. Future Requirements

Title 40 CFR 63 Subpart DDDDD: National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters. On July 30, 2007, the United States Court of Appeals for the District of Columbia Circuit issued a mandate vacating and remanding the NESHAP for Industrial Boilers and Process Heaters. The Subpart is not currently in effect.

In 2009 SWCAA compiled test data on emissions from lumber drying from various sources within and outside SWCAA jurisdiction. HAP emissions from the dry kiln operations were recalculated with this updated information for the maximum throughput of Hampton Lumber Randle. Based on this updated emissions data the facility is major for HAP emissions and therefore Subpart DDDDD applies. The lumber drying and hog fuel boiler operations combined emit 12.97 tpy of acetaldehyde and 13.00 tpy of methanol.

Title 40 CFR Part 63.4680et seq. Subpart QQQQ: National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products. This Subpart applies to each facility that applies coatings using, for example, roll coaters or curtain coaters in the finishing or laminating of any wood building product that contains more than 50 percent by weight wood or wood fiber excluding the weight of any glass components, and is used in the construction, either interior or exterior, of a residential, commercial, or institutional building. An applicability determination request has been submitted to the Environmental Protection Agency to determine if this Subpart applies to the application of anti-stain/antifungal coatings on finished lumber

VII. EXPLANATION OF MONITORING TERMS AND CONDITIONS

M1. Visible Emissions Monitoring

The applicable requirements cited in this monitoring section are general requirements drawn from WAC 173-400, SWCAA 400, and SWCAA 06-2691R1. These requirements do not directly establish any specific regime of monitoring or recordkeeping. Consequently, SWCAA has implemented monitoring and recordkeeping requirements under the "gap filling" provisions of WAC 173-401-615.

M1 is designed to assure compliance through periodic facility inspections and prompt corrective action. M1 requires a Plantwide survey to identify potential visible emissions. If emissions are not apparent during the initial survey, it is highly unlikely that the source is in violation with particulate matter or opacity standards and it is unnecessary to perform a formal Method 9 opacity observation. Demonstration of compliance is required in some cases via visible emissions evaluation.

M2. Particulate Matter Emission Monitoring

The applicable requirements cited in this monitoring section are general requirements drawn from WAC 173-400, SWCAA 400, and SWCAA 06-2691R1. A particulate matter exhaust standard of 0.1 gr/dscf applies to both combustion and non-combustion emission units. These requirements do not directly establish any specific regime of monitoring or recordkeeping for all particulate matter emission sources. Consequently, SWCAA has implemented monitoring and recordkeeping requirements under the "gap filling" provisions of WAC 173-401-615. The site inspection and visual observation are surrogate methods for assessing the relative emissions from emission units that have demonstrated emissions well below the general standards.

M2 is designed to assure compliance through periodic facility inspections and prompt corrective action. M2 requires a Plantwide survey to identify potential excess particulate matter emissions.

M3. Fugitive Emissions Monitoring

The applicable requirements cited in this monitoring section are requirements drawn from WAC 173-400, SWCAA 400, and SWCAA 06-2691R1. SWCAA 06-2691R1 requires that reasonable precautions shall be taken to prevent and minimize fugitive emissions. These precautions include utilizing equipment such as street sweepers and watering trucks on facility roads, keeping dry kiln doors closed during operation, and venting dry kilns through elevated stacks. The use of the street sweepers and watering trucks shall be recorded when utilized.

M3 requires the permittee to perform monthly inspections of the facility during daylight hours to identify any excess fugitive emissions, including fugitive dust.

M4. Complaint Monitoring

The applicable requirements cited in this monitoring section are general requirements drawn from WAC 173-400, SWCAA 400, SWCAA 06-2691R1. SWCAA 06-2691R1 requires that operations that cause or contribute to a nuisance odor shall use recognized good practice and procedures to reduce these odors to a reasonable minimum. These requirements do not directly establish any specific regime of monitoring or recordkeeping. Consequently, SWCAA has implemented monitoring and recordkeeping requirements under the "gap filling" provisions of WAC 173-401-615.

M4 is designed to ensure compliance through prompt complaint response and corrective action.

M5. Compliance Certification

The applicable requirements cited in this monitoring section are drawn from 40 CFR 64, WAC 173-400-040(7) and SWCAA 400-040(7), SWCAA 06-2691R1. WAC 173-400-040(7) and SWCAA 400-040(7) are general requirements which do not directly establish any specific regime of monitoring or recordkeeping. Consequently, SWCAA has implemented monitoring and recordkeeping requirements under the "gap filling" provisions of WAC 173-401-615.

WAC 173-400-040(7) and SWCAA 400-040(7) prohibit the concealment or masking of emissions which would otherwise violate a general standard. The permittee does not operate any equipment capable of masking emissions so semi-annual certification is deemed sufficient to assure compliance.

SWCAA 06-2691R1 requires the permittee to install specific equipment, and the boiler to be fired on clean hog fuel only. SWCAA has required semi-annual certification that the monitoring equipment is installed and maintained, and the boiler is operated on only clean hog fuel.

M6. SO₂ Emission Standard

The applicable requirements cited in this monitoring section are drawn from WAC 173-400-040(6), SWCAA 400-040(6), and SWCAA 06-2691R1. WAC 173-400-040(6) and SWCAA 400-040(6) limit the emission of sulfur dioxide from combustion sources to a maximum of 1000 ppm_v corrected to a specified oxygen percentage. The boiler at this source is only fired with hog fuel and other wood byproducts from facility operations. These fuels have extremely low fuel sulfur contents relative to other petroleum-based fuels. Based on stoichiometric analysis, it is not physically possible for the combustion sources in question to exceed the limit of 1000 ppm_v sulfur dioxide while firing on these fuels. Monitoring has therefore been limited to certification of fuel type.

M7. Hog Fuel Boiler Operations Monitoring

The applicable requirements cited in this monitoring requirement are drawn from 40 CFR 64 and SWCAA 06-2691R1. Proper maintenance of the boiler assures clean and efficient operations.

M7 is designed to ensure maximum performance from the boiler, EU-3.

M8. Monitoring and Emissions from Lumber Drying

The applicable requirements cited in this monitoring requirement are drawn from SWCAA 06-2691R1. Compliance with the specified emission limits are calculated based on lumber throughput and SWCAA Default February 2009 emission factors. A maximum set point temperature is specified for the lumber dry kilns that has been

determined to produce lower emissions and/or minimize smoke from partial combustion of exhaust gases.

M8 is designed to collect and retain process data which will then be used to calculate emissions for EU-4.

M9. Material Handling Operations Monitoring

The applicable requirements cited in this monitoring requirement are drawn from SWCAA 06-2691R1. These requirements specify monitoring parameters for the proper operation of the facility's baghouse and bin unloading operations. Compliance with the specified emission limits are calculated based on actual bone dry tons unloaded and annual hours of operation.

M9 is designed to collect and retain process data which will then be used to calculate emissions for EU-2.

M10. Anti-Stain Monitoring

The applicable requirement cited in this monitoring requirement are drawn from SWCAA 06-2691R1. Compliance with the specified emission limits are calculated based on actual anti-stain usage and MSDS information. Prior approval of use of a new material is required to assure applicable ASILs, as defined in WAC 173-460 [effective 8/98], are not exceeded.

M10 is designed to collect and retain process data which will then be used to calculate emissions for EU-5.

M11. Particulate Matter Emissions Testing

The applicable requirements cited in this monitoring section are drawn from SWCAA 06-2691R1. A schedule of emission testing to confirm compliance with the requirements is provided. Testing is to be conducted in accordance with SWCAA 06-2691R1, Appendix D which prescribes sampling points, testing protocols, data reduction, and reporting formats. M11 is designed to provide periodic demonstration of compliance with particulate matter emission limits.

M11 is designed to determine equipment operation and to assure compliance with emission limits for EU-2.

M12. Lumber Drying Emission Testing

The applicable requirement cited in this monitoring section is drawn from SWCAA 06-2691R1. SWCAA 06-2691R1 establishes a schedule of emission testing to gather data to set the emission factors for future permitting actions. The results are not used for compliance determinations. Testing is to be conducted in accordance with SWCAA 06-2691R1, Appendix C. The method prescribes sampling points, testing protocols, data reduction, and reporting formats. It is important to note that the specified test method does not directly test the kilns. Testing is performed on wood samples in a laboratory environment. Lumber drying emissions are calculated based on lumber throughput and an emission factor established in the Air Discharge Permit.

An alternative test method or testing schedule may be requested in writing from SWCAA's Executive Director in advance of the source test's scheduled deadline depending on facility operations and circumstances.

Emission testing had been delayed due to the unavailability of an emission testing company.

M12 is designed to provide new data to establish future emission factors for this type of process.

M13. Boiler Emission Testing

The applicable requirements cited in this monitoring section are drawn from SWCAA 06-2691R1. SWCAA 06-2691R1 establishes a schedule of emission testing to confirm compliance with the requirements. Testing is to be conducted in accordance with SWCAA 06-2691R1, Appendix A which prescribes sampling points, testing protocols, data reduction, and reporting formats.

An alternative test method or testing schedule may be requested in writing from SWCAA's Executive Director in advance of the source test's scheduled deadline depending on facility operations and circumstances.

M13 is designed to demonstrate compliance through periodic testing for EU-3.

M14. Boiler Continuous Emission Monitoring

The applicable requirement cited in this monitoring section is drawn from SWCAA 06-2691R1.

A CEMS for NO_x, CO, and O₂ monitors exhaust concentrations and mass emission rates of these pollutants from the hog fuel boiler. A COMS for measuring the opacity of emissions is also maintained on the boiler exhaust stack.

M14 is designed to demonstrate compliance with the specific pollutant emissions limits and standards for EU-3.

VIII. EXPLANATION OF RECORDKEEPING TERMS AND CONDITIONS**K1. General Recordkeeping**

This recordkeeping section is taken directly from SWCAA 06-2691R1 and WAC 173-401-615(2). Recordkeeping requirements were separated into Sections (a) through (d) to organize the requirements.

K1(d) "Sampling and Emission Testing" applies to source testing reports. SWCAA expects that the only source testing to be performed will be the performance testing of EU-2, EU-3 and EU-4 during the performance demonstration detailed in M11, M12 and M13.

K2. Continuous Emission Data Recordkeeping

This recordkeeping section is taken directly from SWCAA 06-2691R1 and WAC 173-401-615(2).

IX. EXPLANATION OF REPORTING TERMS AND CONDITIONS**R1. Deviations from Permit Conditions**

The permittee is required to report all permit deviations. This reporting section is taken directly from WAC 173-401-615(3) and SWCAA 400-107. The permittee is required to report all permit deviations no later than 30 days following the end of the month during which the deviation is discovered. Permit deviations due to excess emissions shall be reported to SWCAA as soon as possible. SWCAA may request a full report of any deviation if determined necessary. These deviations are also reported in each semi-annual report.

R2. Complaint Reports

The permittee is required to report all complaints to SWCAA within three business days of receipt to ensure prompt complaint response. This reporting section is based on WAC 173-401-615(3).

R3. Semi-Annual Reports

The permittee is required to provide a report on the status of all monitoring records and provide a certification of all reports on a semi-annual basis. Semi-annual reporting and certification of monitoring records is required by WAC 173-401-615(3). A Responsible Official must certify all reports required by the Title V permit.

The semi-annual report provides information on the status of all required monitoring. The actual results (e.g. measured pressure drops, opacity readings, etc.) do not need to be submitted unless specifically required by the permit.

R4. Annual Reports

Annual Compliance Certification: The permittee is required to report and certify compliance with all permit terms and conditions on an annual basis. Annual compliance certification is required by SWCAA 401-630(5). Any deviations from permit conditions or certifications of intermittent compliance need to be accompanied by an explanation.

Annual Report: The contents of the annual report are specified. The requirement includes the submission of a boiler grate cleaning schedule. The report is designed to establish a regular schedule for grate cleaning operations.

R5. Emission Inventory Reports

The permittee is required to report an inventory of emissions from the source, and certify compliance with all permit terms and conditions on an annual basis. The annual emissions inventory must be submitted to SWCAA by March 15th for the previous calendar year as provided in SWCAA 400-105. A complete emissions inventory includes quantifiable emissions from all EUs described in Section II and the IEUs described in Section III.

R6. Source Test and RATA Reports

This reporting section is taken from SWCAA 400-106(1)(g), SWCAA 06-2691R1 and Appendices A, B, C, D. The permittee is required to report test results within 45 days of test completion to allow timely review by SWCAA.

R7. MACT Reports

In 2009 SWCAA compiled test data on emissions from lumber drying from various sources within and outside SWCAA jurisdiction. HAP emissions from the dry kiln operations were recalculated with this updated information for the maximum throughput of Hampton Lumber Randle; based on this updated emissions data the facility is major for HAP emissions. The lumber drying and hog fuel boiler operations combined emit 10.56 tpy of acetaldehyde.

Subpart DDDD

Subpart DDDD (Plywood and Composite Wood Products MACT) applies to various wood products facility processes, including dry kilns, located at facilities that emit more than 10 tons per year of a single HAP or 25 tons per year combined HAPs.

The facility is required to comply with the initial notification requirement for Subpart DDDD and that initial notification was submitted July 15, 2009.

Subpart DDDDD

Subpart DDDDD (Industrial, Commercial, and Institutional Boilers and Process Heaters MACT) applies to boilers located at facilities that emit more than 10 tons per year of a single HAP or 25 tons per year combined HAPs.

Subpart DDDDD was vacated on June 8, 2007.

X. COMPLIANCE HISTORY**Hampton Lumber Mills, Inc. – Randle Facility**

<u>Date</u>	<u>FNOV/C Number</u>	<u>Violation</u>
3/10/10	3322	Submitted Title V renewal application late.
11/9/09	3321	Exceeded bin unloading particulate matter emission limits.
3/9/06	3303	Exceeded opacity and emission limits.

XI. COMMENTS

Comment 1. *We discussed the issue of drying temp at Morton and wanted to make sure it was consistent with the Randle Title V and a daily average.*

Response: SWCAA agrees that we discussed the dry kiln drying temperature and want to be consistent with the Morton Facility Title V. As indicated in the current draft permit language, the monitoring requirement M8 is based on a daily averaging period. No language change is necessary.

Comment 2.

We are a bit concerned about the Subpart QQQQ NESHAP language on page 14 of the Basis Statement. To have it stated as a "maybe" puts us in and awkward position as we neither have a mandate to comply nor do we have an inapplicability determination that provides us with a permit shield. We would prefer that SWCAA identify it as inapplicable pending a determination by EPA that the standard is applicable. Given that such a determination could take years, that allows us to proceed in the meantime. If EPA issues a determination that QQQQ is applicable, then SWCAA can reopen the permit and we will immediately file the required paperwork. As we understand it, all we are talking about is paperwork as we are compliant with the HAP content limits.

Response: EPA has not yet issued a determination on Subpart QQQQ and therefore the applicability to the facility's process is still undetermined. SWCAA did agree to change the language from "It is indeterminate whether the application of anti-stain/antifungal coatings on finished lumber is covered by this Subpart and an applicability determination has been submitted to the Environmental Protection Agency" to "An applicability determination request has been submitted to the Environmental Protection Agency to determine if this Subpart applies to the application of anti-stain/antifungal coatings on finished lumber."

XII. PERMIT ACTIONSInitial Permitting Actions

- | | | |
|----|---------------------------------------|--------------------|
| 1. | Initial Permit Application: | June 7, 1995 |
| | Additional Information Submitted: | November 25, 1995 |
| 2. | Application Complete: | December 7, 1995 |
| 3. | Application Sent to EPA: | September 19, 1997 |
| 4. | Draft Permit Issued: | September 19, 1997 |
| 5. | Proposed Permit Issued: | November 24, 1997 |
| 6. | Final Permit Issued: | December 15, 1997 |
| 7. | Administrative Revised Permit Issued: | October 15, 2001 |

First Renewal Permitting Actions

- | | | |
|----|---|-------------------|
| 1. | Notice to Submit Application for Permit Renewal | May 1, 2001 |
| 2. | Initial Permit Renewal Application: | December 15, 2001 |
| 3. | Renewal Application Complete: | February 14, 2002 |
| 4. | Draft Permit Issued: | April 15, 2004 |
| 5. | Proposed Permit Issued: | November 23, 2004 |
| 6. | Final Permit Issued: | January 10, 2005 |

Second Renewal Permitting Actions

- | | | |
|----|-------------------------------|-------------------|
| 1. | Permit Renewal Application: | March 10, 2010 |
| 2. | Renewal Application Complete: | April 19, 2010 |
| 3. | Draft Permit Issued: | September 7, 2010 |
| 4. | Proposed Permit Issued: | October 21, 2010 |
| 5. | Final Permit Issued: | December 15, 2010 |