



Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency
Region 10 – Seattle, WA

Clean Air Act Full Compliance Evaluation Inspection Report

Yakama Forest Products

**Yakama Reservation
White Swan, Washington**

Inspection Date: June 21, 2023

Report Author Signature

Date

Jon Klemesrud
Enforcement & Compliance Assurance Division
EPA Region 10

Peer Review Signature

Date

Sara Conley
Enforcement & Compliance Assurance Division
EPA Region 10

Branch Chief Signature

Date

Morgan Jencius
Chief, Air & Land Enforcement Branch
Enforcement & Compliance Assurance Division
EPA Region 10

Table of Contents

1. Facility Information	3
2. Inspection Information	3
3. Facility Background	4
4. Compliance History	6
5. Inspection Chronology	6
6. Opening Conference	6
7. Facility Walk-Through	7
8. Records Review	9
9. Potential Compliance Concerns.....	12
10. Closing Conference	13

Attachments

Attachment 1	Aerial Image (Google Earth)
Attachment 2	Title V Air Quality Operating Permit #R10T5120101
Attachment 3	Facility Diagram
Attachment 4	Photograph Log
Attachment 5	2022 Fee Calculation Worksheet
Attachment 6	Startup, Shutdown, and Malfunction Records

1. Facility Information

Facility: Yakama Forest Products

Facility Owner: Yakama Nation

Facility Address: 3191 Wesley Road (Log/Small Sawmill Office)
White Swan, Washington

251 Wesley Road (Large Sawmill Office)
White Swan, Washington

Facility Mailing Address: P.O. Box 489
251 Wesley Road
White Swan, Washington

AFS/FRS Number: 53-077-00072/110002033763

SIC: 2421 (Sawmills and Planing Mills, General)

NAICS: 321113 (Sawmills)

EPA Air Permit Number: R10T5120101 (Renewal #1 Modification #1)

Facility Contacts: Ty Young, Plant Manager
Yakama Forest Products
tyy@nwinfo.net

Robert Ripley, Boiler & Kiln Supervisor
Yakama Forest Products
robert@yakama-forest.com

JD Mann, Chief Financial Officer
Yakama Forest Products

Steve Rigdon, General Manager
Yakama Forest Products
steve@yakama-forest.com

2. Inspection Information

Date of Inspection: June 21, 2023

Inspection Start/End Times: 9:05 AM – 12:30 PM

U.S. EPA Inspector: Jon Klemesrud
Field, Data, & Drinking Water Enforcement Section (FDDWES)
Enforcement and Compliance Assurance Division (ECAD)
U.S. EPA Region 10

Other Attendees: Katie Swan, Air Quality Specialist
Yakama Nation Environmental Management Program

Terry Ganuelas, Air Quality Technician
Yakama Nation Environmental Management Program

Inspection Notice: This was an unannounced inspection.

Disclaimer:

Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. Ty Young, Mr. Robert Ripley or from observations made during the inspection and/or file review. This inspection report is a summary of observations and information gathered; it does not constitute a final decision regarding compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

This was a full compliance evaluation by the U.S. Environmental Protection Agency Region 10 (EPA R10). EPA R10 led the inspection and was escorted by representatives of Yakama Forest Products and the Yakama Nation Environmental Management Program. The primary purpose of the inspection was to identify if the facility is in compliance with the EPA issued Title V Air Quality Operating Permit #R10T5120101 and associated Federal Clean Air Act (CAA) regulations, including but not limited to:

- 40 CFR Part 60 New Source Performance Standards (NSPS)
 - Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
- 40 CFR Part 63 National Emission Standards for Hazardous Air Pollutants (NESHAP):
 - Subpart DDDD – Plywood and Composite Wood Products
 - Subpart DDDDD –Industrial, Commercial, and Institutional Boilers and Process Heaters.
- 40 CFR Part 49 Federal Air Rule for Reservations (FARR)
 - Subpart M – Implementation Plan for the Confederated Tribes and Bands of the Yakama Nation, Washington

3. Facility Background

Yakama Forest Products (hereinafter referred to as the “YFP” or “Facility”) is located in White Swan, Washington and includes two sawmills, producing common boards, industrial shop lumber, and dimensional lumber from timber harvested from tribal lands. The Facility is wholly

owned by the Confederated Tribes and Bands of the Yakama Nation and is operated by YFP. The two mills at YFP are separated by a public road (Wesley Road). The Small Log Mill (SLM) is located on the east side of Wesley Road, and the Large Log Mill (LLM) is located on the west side of Wesley Road. For a general footprint and location, an aerial image from Google Maps™ is attached to this report as (**Attachment 1**).

The primary air emission activities at the Facility include fuel burning, lumber drying, lumber production and material handling. At the time of inspection, this included two propane fueled boilers that produce steam for lumber drying within seven kilns. Byproducts at the Facility include sawdust (SD), green wood chips (GC), dry wood chips (DC), planer shavings (SH) and hog fuel (HF). These byproducts are stored on-site either in bins or piles until sold and transferred off-site.

The Facility has operated under the Title V Air Quality Operating Permit #R10T5120101 (**Attachment 2**) since September 29, 2015. The first renewal permit was issued and made effective on September 21, 2020. In August of 2022, the permit was modified to remove a decommissioned boiler (Boiler #1) and drying kilns (Kilns #1-4), all of which were located at the SLM location. The permit action reduced the Facility's potential emissions from 277 to 161 tons per year and reduced the potential emissions to less than the Prevention of Significant Deterioration (PSD) major source threshold. The current permit will expire on September 21, 2025.

Emission Units (EUs) currently included in the Title V Permit are the SLM Boiler (Boiler #2), LLM Boilers (Boiler #3 and Boiler #4), LLM Kilns (Kilns #5-11), SLM Cyclone (Cyclone C-1), SLM Bins (Bins HF-1, SD-1, GC-1, DC-1), LLM Cyclones (Cyclone C-2, C-3, C-4), LLM Bins (HF-2, SD-2, DC-2), propane tanks, miscellaneous fugitive and non-fugitive activities, and Facility traffic.

The SLM initially began operation in 1998, with one boiler (Boiler #1) and three single-track lumber drying kiln (Kilns #1-3). A second boiler (Boiler #2) and fourth (double-track) lumber drying kiln (Kiln #4) were added to the SLM in 2001. The Facility then expanded and the LLM began operating in 2002, with two boilers (Boiler #3 & Boiler #4) and five, single-track lumber drying kilns (Kiln #5-9). Two double-track lumber drying kilns (Kiln #10-11) were added to the LLM in 2005/2006. SLM boilers (Boiler #1 & Boiler #2) and kilns (Kilns #1-4) have been shut down since March of 2011.

The Facility initially had four boilers designed to burn oil, in August of 2013, Boiler #3 and Boiler #4 were converted to propane. Boilers previously used at the SLM (Boiler #1 and Boiler #2) have not operated since 2011. Boiler #1 was decommissioned and removed off-site in 2022, and Boiler #2 was moved from the SLM to the LLM in 2023, where it currently sits inoperable.

According to the Facility, Boiler #2 will eventually be restored, the burner will be converted to propane prior to use. Associated oil tanks were removed in 2016. Interior components of Kilns #1-4 at the SLM were removed in early 2023.

4. Compliance History

Based upon my review of YFP's compliance history, EPA last conducted an on-site, full compliance evaluation at the Facility on September 12, 2019. According to the Title V Permit's Statement of Basis (September 21, 2020), the Facility was considered to be in compliance. An off-site, partial compliance evaluation was conducted by EPA on August 23, 2022. According to EPA's Enforcement and Compliance History Online (ECHO) (www.echo.epa.gov), no enforcement actions have occurred within the past 5-years.

5. Inspection Chronology

This inspection was unannounced. Katie Swan (Yakama Nation), Terry Ganuelas (Yakama Nation), and I arrived at the Facility and met with Mr. Ty Young, Plant Manager of YFP to begin the unannounced inspection. The inspection included an opening conference, a facility walk-through, a records review, and a closing conference. For the walk-through, we observed the general operational footprint of both the SLM and LLM locations. The walk-through was generally focused on observing the permitted emission units (EUs). Mr. Young accompanied us throughout the inspection, I was allowed to inspect all areas requested.

An on-site records review occurred at various times during the walk-through. Portions of the records review also occurred pre- and post-inspection, as discussed in Section 8 of this inspection report.

6. Opening Conference

The opening conference was held shortly after our arrival, inside the main conference room at the SLM. After our initial introductions, I provided Mr. Young with my business card and presented my inspector credentials. I discussed the purpose and expectations of the inspection and provided Mr. Young with a copy of EPA's Small Business Resource Information handout, as well as EPA's Confidential Business Information (CBI) Notice Forms. We briefly discussed the handouts and also discussed that photographs would be taken as part of this inspection. Mr. Young had no concerns with photographs and had no claims regarding CBI.

At this time, Mr. Young provided a general background of the Facility's operation, history, and updates to the emission units since EPA's last compliance review (August 2022). Mr. Young discussed that production was currently operating at approximately 30% capacity; however, kilns are running 24/7. Operating hours at the mill are generally 8-hour days 5/days a week. There are currently 230 employees.

The Facility typically processes 60% pine and 40% fir logs, species based upon the harvested timber area and/or customer. The Facility's SLM receives/handles smaller logs at 12–14-inch diameter, larger logs are received handled at the LLM. By-products at both locations are currently hauled to Longview, Washington.

We briefly discussed a few elements of the permit, including open burning and source testing. Mr. Young discussed that the facility does not practice or had any open burning events. No performance testing has occurred since EPA's last compliance review (August 2022). The Facility's two operating boilers (Boiler #1 and Boiler #2) received their last tune-up on August 16, 2022. The most recent Opacity Reading/Test last occurred on March 7, 2023. Mr. Young provided a copy of the propane/fuel combustion records for the current operating year.

7. Facility Walk-Through

Following the opening conference, we began the walk-through at approximately 9:45 AM. Upon leaving the office area near the SLM, we met with Mr. Robert Ripley, Boiler & Kiln Supervisor at YFP. We discussed the EPA inspection with Mr. Ripley and arranged to meet him later on during our walk-through at the LLM boiler and kiln area.

To assist in our walk-through, a Facility Diagram (**Attachment 3**) showing the locations of the SLM and LLM emission sources was used for reference. Photographs taken during the inspection and a complete photo log are attached to this report as (**Attachment 4**).

Location: Small Lumber Mill (SLM)

Observation #: OB-01

We first toured the SLM, located north of the main office and parking area. We started near the dry kiln location along the southwest perimeter (**Photo 1**). The dry kilns (Kilns #1-4) have not operated in approximately 15 years. According to Mr. Young, in the spring of 2023 the kiln structures were gutted and are now being used as a covered mechanical shop for light duty repairs or general storage for large trailers. We observed a truck/trailer inside of Kiln #2 and the remaining kilns were generally empty or used for covered storage.

We then observed the building/structure the previously housed Boiler #2 (**Photo 2**). According to Mr. Young, Boiler #2 was removed in the spring of 2023 and hauled to the boiler room at the LLM. Mr. Young discussed that Boiler #2 will eventually be restored, and its burner will be retrofitted for the burning of propane prior to use at LLM. Restoration was likely a few years out.

Within this southern area of the SLM, we also observed the building/structure that previously housed Boiler #1 (**Photo 3**). Boiler #1 had been decommissioned for some time and was recently removed off-site in 2022. We viewed the area previously used to store the oil tanks used to serve Boiler's #1-2. The oil tanks have also been decommissioned and removed off-site in 2016.

We then toured the cyclone and bin areas (**Photo 4 & Photo 5**) adjacent to the Hew Saw and Planer Buildings. According to Mr. Young, the hew saw has been shut down for approximately two weeks. We also viewed the Facility's firewood processing area. According to Mr. Young, as of April of 2023, the majority of the byproducts are now trucked to Longview, Washington

where they are recycled.

Areas were generally free of material/debris; however, spilled woodchips/shavings/sawdust were observed around the exterior of the loading/drop areas of the bins. Mr. Young discussed that clean-up of material occurs by hand using brooms and shovels. Frequency of clean-up is as needed. I did not observe any visible/fugitive emissions while touring the SLM. We then departed to the LLM.

Location: Large Lumber Mill

Observation #: OB-02

Following our time at the SLM, we traveled to the Facility's LLM. We entered the LLM south of the log yard and log scale and observed the hog fuel (HF) bin and conveyor (**Photo 6**), located in the northeast corner of the LLM area. We continued south and observed the dry chip (DC) and shavings bins (SH) and conveyors (**Photo 7**). We also observed the saw dust (SD) and green chip bins (GC) and conveyors (**Photo 8**).

Areas were generally free of material/debris; however, spilled woodchips/shavings/sawdust were observed around the exterior of the loading/drop areas of the bins. Similar to the SLM, areas around the bins are swept by hand, as needed. We also observed a water truck operating within the log yard to mitigate any fugitive dust associated with vehicle travel.

We continued the facility tour to the boiler room, we first observed Boiler #2 which was moved from the SLM earlier in the year (**Photo 9**). As discussed earlier in this report, Boiler #2 was inoperable and due for repair and retrofitting. We also observed Boiler #4 (**Photo 10**) and Boiler #3 (**Photo 11**).

At the time of inspection, only Boiler #3 was in operation and heating the kilns. Boiler #4 last operated approximately one week prior. According to Mr. Ripley, the O₂ sensor on Boiler #4 has been inoperable for a few weeks. The Facility contracts Yakima Mechanical, a local contractor/consultant business for maintenance and operating parameters for the boiler system. Mr. Ripley stated that a new O₂ was ordered and would hopefully be installed by Yakima Mechanical in the coming weeks.

Mr. Ripley discussed that the most recent tune-up of Boiler #3 and Boiler #4 occurred August 16, 2022, by Yakima Mechanical. Mr. Ripley provided me with copy of the Combustion and Efficiency Report from the August 16, 2022 tune-up. While touring the boiler room, I also observed the operating display/parameters for Boiler #3 (**Photo 12**). According to Facility records, in 2022 Boiler #3 operated 5,958 hours and Boiler #4 operated 6,802 hours.

Mr. Ripley discussed that the Facility maintains start-up/shut-down records associated with the boilers. Mr. Ripley displayed a spreadsheet on a computer within the boiler/kiln office area noting the start-up/shut-down records. Mr. Ripley also stated that some start-up/shut down records are also hand-written by the operators, and the spreadsheet is updated periodically to include those hand-written records. Mr. Ripley also provided me with a copy of the Facility's

most recent (2022) Fugitive Particulate Emissions Prevention Implementation Plan, as well as 2022 Annual Survey.

We also observed the two propane tanks that currently fuel Boiler #3 and Boiler #4 (**Photo 13**). According to Mr. Young, propane is delivered by White Swan Farm Supply on a daily basis. Just south of the propane tanks we observed the boiler blow down evaporation tank (**Photo 14**). According to Mr. Ripley, the evaporation tank is used to mitigate wastewater from the boiler system.

We then observed the kilns at the LLM (**Photo 15**). Kilns #2-5 were currently operating, Kiln #1 was offline undergoing track repair, Kiln #7 was offline due to maintenance on the steam coil piping. We climbed a staircase within the boiler/kiln building and observed the kiln vents from the roof (**Photo 16**). We also observed areas of the LLM from the higher vantage point (**Photo 17**).

We traveled back to the boiler room and observed the stacks associated Boiler #3 and Boiler #4, including the O₂ sensors (**Photo 18 & Photo 19**). Mr. Young was able to provide a view of the fault history on the Boiler #4 display panel to show the O₂ sensor fail (**Photo 20**). We also observed the boilers manufacturing information from the nameplates (**Photo 21 & Photo 22**).

The walkthrough concluded and we traveled back to the Facility's main office to continue with remaining portions of the records review and have a closing conference.

8. Records Review

The following documents were requested/reviewed as part of this inspection:

Record: Annual Fugitive Dust Survey

Ref #: RR-01 - Permit Condition 3.13

At the time of inspection, I requested Annual Fugitive Dust Survey(s) since EPA's last compliance review (August 2022). The Facility provided a copy of their 2022 Annual Fugitive Dust Survey, conducted by Mr. Young and Mr. Rigdon on November 15, 2022. The survey was reviewed post-inspection and was comprehensive of the Facility and well documented. The survey highlighted that attention was needed to the un-hogged fuel piles and the Bark Hog loading station (for clean-up). Minimal sawdust and fines were documented as being observed at both the SLM and LLM.

Record: Fugitive Dust Plan

Ref #: RR-02 – Permit Condition 3.14

At the time of inspection, I requested the Facility's current Fugitive Dust Plan. The Facility provided a copy of their 2022 Fugitive Particulate Emissions Prevention Implementation Plan. The plan was developed as a follow-up to the most recent November 15, 2022 survey. The Plan was reviewed post-inspection and was complete and well documented.

Record: Open Burning Documentation**Ref #:** RR-03 – Permit Condition 3.33

At the time of inspection, I requested records relating to any open burning events since EPA’s last compliance review (August 2022). According to Mr. Young, the Facility has not had any events and open burning is not conducted at the Facility.

Record: Part 71 Annual Emission/Fee Report**Ref #:** RR-04 - Permit Condition 3.41 & 3.42

At the time of inspection, I requested the Facility’s 2022 Annual Emission Report. It was discussed that the report was previously submitted to EPA Region 10 and that a copy would be emailed post-inspection. On July 20, 2023, I received a copy via email from Mr. JD Mann, CFO of YFP. The Annual Emission Report was documented using EPA’s Fee Calculation Worksheet (OMB No. 2060-0336) and was completed on February 28, 2023. The report was reviewed post-inspection. See (**Attachment 5**), 2022 Fee Calculation Worksheet.

Record: Annual Registration Report**Ref #:** RR-05 – Permit Condition 3.46

At the time of inspection, I requested the Facility’s 2023 Annual Registration Report. It was discussed that the report was previously submitted to EPA Region 10 and that a copy would be emailed post-inspection. On July 20, 2023, I received a copy via email from Mr. JD Mann, CFO of YFP. The Annual Registration Report was documented using EPA’s Initial/Annual Source Registration (OMB No 2060-0558) and was completed on February 28, 2023.

Record: Semi-Annual Monitoring Report**Ref #:** RR-06 – Permit Condition 3.47

At the time of inspection, I requested the Facility’s 2022/2023 Semi-Annual Registration Report(s). The Facility was unable to provide documentation that the Semi-Annual Monitoring Report(s) had been completed for 2022/2023.

Record: Annual Compliance Certification**Ref #:** RR-07 – Permit Condition 3.49 & 5.10

At the time of inspection, I requested the Facility’s 2022 Annual Compliance Certification. It was discussed that the report was previously submitted to EPA Region 10. Post-inspection I reviewed the Facility’s 2022 Annual “NSPS Compliance Report” submitted to EPA Region 10. The certification was received February 28, 2023. According to the document, “there were no deviations from the requirements of work practice standards in Table 3 to Subpart DDDDD that apply to us.”

Record: Fuel Certification**Ref #:** RR-08 – Permit Condition 4.3

At the time of inspection, I requested documentation showing the total sulfur content of the fuel. The Mr. Ripley provided me with a liquified petroleum gas specification document received from their distributor.

Record: Visible and Fugitive Emission Monitoring and Recordkeeping**Ref #:** RR-09 - Permit Condition 4.9

At the time of inspection, I requested visible emission surveys since EPA's last compliance review (August 2022). Post-inspection via email, Mr. Ripley provided me with a copy of the March 7, 2023 quarterly opacity test report/survey. Opacity tests were last performed on March 7, 2023, by Mr. Terry Ganuelas, Mr. Tony Yocash and Mr. Robert Ripley. All of the surveys reported 0% opacity.

Record: Boiler Startup, Shutdown, and Malfunction Records**Ref #:** RR-10 – Permit Condition 4.16 & 5.8

At the time of inspection, I requested to review the boiler startup, shutdown, and malfunction records since EPA's last compliance review (August 2022). As discussed earlier in this report, at the time of inspection Mr. Ripley displayed a spreadsheet on a computer within the boiler/kiln office area noting the start-up/shut-down records. Mr. Ripley also stated that some start-up/shut down records are also hand-written by the operators, and the spreadsheet is updated periodically to include those hand-written records. On June 29, 2023, Mr. Ripley provided the startup, shutdown, and malfunction records via email. The document was reviewed post-inspection, it contained records from August 2018 – present (**Attachment 6**).

Record: Boiler Maintenance/Tune-Up Records**Ref #:** RR-04 - Permit Condition 4.17 & 5.7

At the time of inspection, I requested the most recent boiler tune-up/maintenance records for the boilers. Mr. Ripley provided me with a copy of the Combustion and Efficiency Report from the August 16, 2022 maintenance record performed by Yakima Mechanical.

Mr. Young provided me with boiler fuel quantities delivered for each calendar month in 2023:

Month:	Total Gallons Used:
January	170,010
February	210,057
March	269,507
April	213,500
May	160,304
June	77,724

9. Potential Compliance Concerns

Observations during the on-site inspection and records review identified the following potential compliance concerns. Potential compliance concerns may not be in sequential order:

1. Boiler Startup/Shut Down & Tune-Up Documentation

Section 4.16. of the permit states: NSPS Records of Startup, Shutdown, and Malfunction. The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility [40 CFR 60.7(b)]

As discussed earlier in this report, at the time of inspection Mr. Ripley displayed a spreadsheet on a computer within the boiler/kiln office area noting the start-up/shut-down records. Mr. Ripley also stated that some start-up/shut down records are also hand-written by the operators and the spreadsheet is updated periodically to include those hand-written records. On June 29, 2023, Mr. Ripley provided the combined startup, shutdown, and malfunction records via email (**Attachment 6**).

The concern is that reviewed startup, shutdown and malfunction records were often incomplete. Many entries indicated shutdown occurrences without indicating the duration and corresponding start-up.

2. Boiler #4 Operation Without Working O₂ Sensor

As discussed earlier in this report, at the time of inspection it was discussed that Boiler #4 last operated approximately one week prior. According to Mr. Ripley, the O₂ sensor on Boiler #4 has been inoperable for a few weeks. Mr. Ripley stated that a new O₂ was ordered and would hopefully be installed by Yakima Mechanical in the coming weeks.

The concern is the prior operation of Boiler #4 without a working O₂ sensor to ensure proper combustion.

3. Annual & Semi-Annual Compliance Certification Reporting

Section 3.47. and 3.49. of the permit discusses the annual and semi-annual reporting requirements and required contents.

The concern is that the Facility was unable to provide documentation of a completed/submitted annual and semi-annual reports since EPA's last compliance review (August 2022). The facility submitted a timely NESHAP Subpart DDDDD Annual Compliance Report (Section 5.10. of the permit). In discussions with the Facility, there was some confusion between the two annual documents/requirements.

4. Excess/Spilled Material/Byproduct at SLM & LLM Bins

Section 3.12. and 3.12.4. states: “The permittee shall take all reasonable precautions to prevent fugitive particulate matter emissions and shall maintain and operate all pollutant-emitting activities to minimize fugitive particulate matter emissions. Reasonable precautions include but are not limited to the following:” “Implementation of good housekeeping practices to avoid or minimize the accumulation of dusty materials that have the potential to become airborne, and the prompt cleanup of spilled or accumulated materials.

As discussed earlier in this report, while touring the SML and LLM, areas were generally free of material/debris; however, spilled woodchips/shavings/sawdust were observed around the exterior of the loading/drop areas of the bins (**Photo 4**, **Photo 5**, **Photo 7**, and **Photo 8**). I recommended to Mr. Young that Facility ensures accumulated material is cleaned up to avoid/minimize fugitive particulate matter.

10. Closing Conference

Following the walk-through and on-site records review, a closing conference was held with Mr. Young inside of the SLM conference room. I discussed my general observations, potential compliance concerns and follow-up items. In response to the potential compliance concerns, Mr. Young discussed that the Facility could benefit from a more detailed review of the permit. I then thanked him for his time and assistance during the inspection and departed the Facility.

Attachment 1

Aerial Image (Google Earth)



Attachment 2

Title V Air Quality Operating Permit

#R10T5120101

United States Environmental Protection Agency
Region 10, Air & Radiation Division
1200 Sixth Avenue, Suite 155
Seattle, Washington 98101

Permit Number: R10T5120101
Issued: August 15, 2022
Effective: August 15, 2022
Expiration: 9/21/2025
Replaces: R10T5120000
AFS Plant I.D. Number: 53-077-00072

Title V Air Quality Operating Permit Permit Renewal #1 Modification #1

In accordance with the provisions of Title V of the Clean Air Act (42 U.S.C. 7401 *et seq.*), 40 CFR Part 71 and other applicable rules and regulations,

Yakama Forest Products

is authorized to operate air emission units and to conduct other air pollutant emitting activities in accordance with the conditions listed in this permit. This source is authorized to operate in the following location:

Location: Yakama Reservation
251 Medicine Valley Road
White Swan, Washington
Latitude: 46° 23' 12" N
Longitude: 120° 45' 13" W

Responsible Official: Steve Rigdon, General Manager
Yakama Forest Products
3191 Wesley Road
P.O. Box 489
White Swan, Washington 98952
Phone: 509-874-2901 Ext 101, Fax: 509-874-8884
Email: steve@yakama-forest.com

Company Contact: Robert Ripley, Safety Manager
Yakama Forest Products
3191 Wesley Road
P.O. Box 489
White Swan, Washington 98952
Phone: 509-874-3019 Fax: 509-874-8884
Email: Safety@yakama-forest.com

The United States Environmental Protection Agency (EPA) has also developed a statement of basis that describes the bases for conditions contained in this permit.

Geoffrey Glass, Acting Chief
Air Permits and Toxics Branch
Air and Radiation Division
U.S. EPA, Region 10

August 15, 2022
Date

Table of Contents

Abbreviations and Acronyms	4
1. Source Information and Emission Units	5
2. Standard Terms and Conditions.....	6
Permit Shield.....	7
Other Credible Evidence.....	7
Permit Actions	7
Permit Expiration and Renewal	7
Off-Permit Changes	8
Emissions Trading and Operational Flexibility	8
Severability	9
Property Rights	9
3. General Requirements	9
General Compliance Schedule.....	9
Inspection and Entry	9
Open Burning Restrictions.....	9
Visible Emissions Limits	11
Fugitive Particulate Matter Requirements and Recordkeeping	11
Other Work Practice Requirements and Recordkeeping	12
General Testing and Associated Recordkeeping and Reporting.....	13
General Recordkeeping.....	15
General Reporting.....	16
Part 71 Emission and Fee Reporting.....	17
Annual Registration	18
Periodic and Deviation Reporting.....	19
Annual Compliance Certification	20
Document Certification.....	21
Permit Renewal	21
4. Facility-Specific Requirements.....	21
Fees and Emission Reports Due Date	21
Fuel Sulfur Limits	21
Fuel Sulfur Monitoring and Recordkeeping	21
Visible and Fugitive Emission Monitoring and Recordkeeping	22
NSPS Work Practice Requirements (for Boilers #2-4).....	24
NSPS Recordkeeping Requirements (for Boilers #2-4).....	24

Table of Contents

NSPS Reporting Requirements (for Boilers #2-4).....	24
NESHAP Work Practice Requirements	25
NESHAP Recordkeeping Requirements.....	25
NESHAP Notification and Reporting Requirements.....	25
5. Unit-Specific Requirements – Boilers #2-4.....	26
Boilers #2-4 Emission Limits and Work Practice Requirements.....	26
Boilers #2-4 Monitoring and Recordkeeping Requirements	28
Boilers #2-4 Notification and Reporting Requirements.....	29
6. Unit-Specific Requirements – Lumber Kilns #5-11.....	31
Lumber Kilns #5-11 Emission Limits and Work Practice Requirements.....	31
Lumber Kilns #5-11 Monitoring and Recordkeeping Requirements.....	Error! Bookmark not defined.
7. Unit-Specific Requirements – Cyclones.....	31
Cyclones Emission Limits and Work Practice Requirements.....	31
8. Unit-Specific Requirements – Bins	31
Bins Emission Limits and Work Practice Requirements	31
9. Unit-Specific Requirements – MNFA (Miscellaneous Non-Fugitive Activities)	32
MNFA Emission Limits and Work Practice Requirements.....	32

Abbreviations and Acronyms

Btu	British thermal units
CAA	Clean Air Act [42 U.S.C. section 7401 et seq.]
CAM	Compliance assurance monitoring
CFR	Code of Federal Regulations
CO	Carbon monoxide
COMS	Continuous opacity monitoring system
DC	Dry chips
dscf	Dry standard cubic feet
EPA	United States Environmental Protection Agency (also U.S. EPA)
EU	Emission Unit
FARR	Federal Air Rules for Reservations
FR	Federal Register
gal	gallon(s)
GC	Green chips
gr	grains (7,000 grains = 1 pound)
HAP	Hazardous air pollutant
HF	Hog fuel (aka hogged fuel or wood waste)
hr	Hour
lb	Pound (lbs = pounds)
lbm	Pound-mole
LLM	Large log mill
MACT	Maximum Achievable Control Technology
m	thousand
mm	million
bf	board feet
NESHAP	National Emission Standards for Hazardous Air Pollutants (40 CFR Parts 61 and 63)
NO _x	Nitrogen oxides
NSPS	New Source Performance Standards (40 CFR Part 60)
PM	Particulate matter
PM ₁₀	Particulate matter less than or equal to 10 microns in aerodynamic diameter
PM _{2.5}	Particulate matter less than or equal to 2.5 microns in aerodynamic diameter
ppmdv	Parts per million on a dry, volume basis
PSD	Prevention of significant deterioration
PTE	Potential to emit
S	Sulfur
SD	Sander dust
SH	Shavings
SLM	Small log mill
SO ₂	Sulfur dioxide
tpy	Tons per year
VOC	Volatile organic compound

Also see 40 CFR 60.2, 60.41c, 63.2, 63.2292, 63.7575 and 71.2.

1. Source Information and Emission Units

The Yakama Forest Products facility is made up of two sawmills (large log mill and small log mill) that produce dry dimensional lumber from logs. The emission units are listed in Table 1.

Table 1: Emission Units & Control Devices

EU ID	Emission Unit Description	Control Device
SLM Boiler	In the small log mill, a propane fired boiler supplies steam to the small log mill: Superior Model No. 7-4-2500, Serial No. 14159. Boiler 2 was installed in 2001. Heat input capacity is 24.92 million Btu/hr and maximum steam production is 21,562 lb/hr. It will be converted from oil-firing to propane-firing prior to restarting.	None
LLM Boilers	In the large log mill, two propane fired boilers supply steam to the large log mill kilns: Superior Model No. 6-5-5000 and Serial Nos. 14921 and 14922. Both were installed in 2002. Both were converted from oil to propane firing in 2014. Since converting, they each now have a heat input capacity rating of 33 million Btu/hr and a maximum steam production rate of 26,400 lb/hr.	None
LLM Kilns	In the large log mill, seven indirectly heated Coe brand kilns dry lumber. Kilns #5-9 are 100-foot long single-track kilns installed in 2002; kilns #10-11 are 100-foot long double track kilns installed in 2005. Approximate total annual capacity per wood species for all large log mill kilns is 116.5 mmbf (Grand Fir), 116.4 mmbf (Douglas Fir) and 77.2 mmbf (pine).	None
SLM Cyclone	In the small log mill, Cyclone C-1 separates shavings from a pneumatic handling system into Bin SH-1.	None
LLM Cyclones	In the large log mill, Cyclones C-2, C-3 and C-4 separate sawdust, green chips and shavings, respectively, from pneumatic handling systems onto the hogged fuel conveyor, into Bin GC-2 and into Bin SH-2, respectively. Approximately 2% of the sawdust produced in the large log mill is moved pneumatically.	None
SLM Bins	In the small log mill, Bins HF-1, SD-1, GC-1, DC-1 store hog fuel, sawdust, green chips and dry chips, respectively, received from conveyor belts; Bin SH-1 stores shavings received from Cyclone C-1. All five bins unload to trucks.	None
LLM Bins	In the large log mill, Bins HF-2, SD-2 and DC-2 store hog fuel and sawdust, only sawdust, and dry chips, respectively, received from conveyors belts; Bins GC-2 and SH-2 store green chips and shavings, respectively, received from Cyclones C-3 and C-4. Bin HF-2 receives approximately 2% of the sawdust produced in the large log mill while Bin SD-2 receives approximately 98%. All five bins unload to trucks.	None

EU ID	Emission Unit Description	Control Device
Propane Tanks	In the large log mill, two storage tanks store propane fuel. Capacity is 30,000 gallons each. Both were installed in 2014.	None
MNFA	In both mills, <u>miscellaneous non-fugitive activities</u> generate emission inside buildings and are not described in other emission units.	Generated inside buildings
MFA	In both mills, <u>miscellaneous fugitive activities</u> generate emissions outside buildings and are not described in other emission units.	None
PT	In both mills, <u>plant traffic</u> by vehicles on paved and unpaved roads generate fugitive dust emissions.	Watering
PCMF*	In each mill, <u>pneumatically conveyed metal filings</u> are sent into 55-gallon drums.	None
Gas Tank*	At the small log mill, a 500-gallon storage tank stores gasoline fuel.	None
TD Tank*	At the small log mill, a 12,000-gallon storage tank stores truck diesel fuel.	None
FL Tank*	At the small log mill, a 1,000-gallon storage tank stores forklift diesel fuel.	None
Kerosene Tank*	At the small log mill, a 200-gallon storage tank stores kerosene.	None
HO Tank*	At the small log mill, a heating oil storage tank currently storing waste oil totaling 1,000 gallons of fuel.	None
LLMD Tanks*	At the large log mill, two diesel oil storage tanks. One totaling 10,000 gallons and the second totaling 6,000 gallons of diesel.	None

* Insignificant Emission Units (IEU).

2. Standard Terms and Conditions

- 2.1. Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations. The language of the cited regulation takes precedence over paraphrasing except the text of terms specified pursuant to any of the following sections is directly enforceable: section 304(f)(4) of the Federal Clean Air Act (CAA), 40 CFR 71.6(a)(3)(i)(B) and (C), 71.6(a)(3)(ii), 71.6(b), and 71.6(c)(1), or any other term specifically identified as directly enforceable.

Compliance with the Permit

- 2.2. The permittee must comply with all conditions of this Part 71 permit. All terms and conditions of this permit are enforceable by the EPA and citizens under the Clean Air Act. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [40 CFR 71.6(a)(6)(i); 71.6(b)]

- 2.3. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [40 CFR 71.6(a)(6)(ii)]

Permit Shield

- 2.4. Compliance with the terms and conditions of this permit shall be deemed compliance with the applicable requirements specifically listed in this permit as of the date of permit issuance. [40 CFR 71.6(f)(1)]
- 2.5. Nothing in this permit shall alter or affect the following:
- 2.5.1. The provisions of section 303 of the Clean Air Act (emergency orders), including the authority of the EPA under that section;
 - 2.5.2. The liability of a permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - 2.5.3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Clean Air Act; or
 - 2.5.4. The ability of the EPA to obtain information under section 114 of the Clean Air Act. [40 CFR 71.6(f)(3)]

Other Credible Evidence

- 2.6. For the purpose of submitting compliance certifications in accordance with Condition 3.49 of this permit, or establishing whether or not the permittee has violated or is in violation of any requirement of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether the permittee would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.
[Section 113(a) and 113(e)(1) of the CAA, 40 CFR 49.123(d), 51.212, 52.12, 52.33, 60.11(g) and 61.12(e)]

Permit Actions

- 2.7. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 71.6(a)(6)(iii)]
- 2.8. The permit may be reopened by the EPA and the permit revised prior to expiration under any of the circumstances described in 40 CFR 71.7(f). [40 CFR 71.7(f)]

Permit Expiration and Renewal

- 2.9. This permit shall expire on the expiration date on page one of this permit or on an earlier date if the source is issued a Part 70 or Part 71 permit by a permitting authority under an EPA approved or delegated permit program. [40 CFR 71.6(a)(11)]
- 2.10. Expiration of this permit terminates the permittee's right to operate unless a timely and complete permit renewal application has been submitted at least six months, but not more than 18 months, prior to the date of expiration of this permit. [40 CFR 71.5(a)(1)(iii), 71.7(b) and 71.7(c)(1)(ii)]
- 2.11. If the permittee submits a timely and complete permit application for renewal, consistent with 40 CFR 71.5(a)(2), but the EPA has failed to issue or deny the renewal permit, then all the terms and conditions of the permit, including any permit shield granted pursuant to 40 CFR 71.6(f) shall

remain in effect until the renewal permit has been issued or denied. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the EPA any additional information identified as being needed to process the application. [40 CFR 71.7(c)(3) and 71.7(b)]

Off-Permit Changes

- 2.12. The permittee is allowed to make certain changes without a permit revision, provided that the following requirements are met:
- 2.12.1. Each change is not addressed or prohibited by this permit;
 - 2.12.2. Each change meets all applicable requirements and does not violate any existing permit term or condition;
 - 2.12.3. The changes are not changes subject to any requirement of 40 CFR Parts 72 through 78 or modifications under any provision of Title I of the Clean Air Act;
 - 2.12.4. The permittee provides contemporaneous written notice to the EPA of each change, except for changes that qualify as insignificant activities under 40 CFR 71.5(c)(11), that describes each change, the date of the change, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change;
 - 2.12.5. The changes are not covered by a permit shield provided under 40 CFR 71.6(f) and Conditions 2.4 and 2.5 of this permit; and
 - 2.12.6. The permittee keeps a record describing all changes that result in emissions of any regulated air pollutant subject to any applicable requirement not otherwise regulated under this permit, and the emissions resulting from those changes.

[40 CFR 71.6(a)(12)]

Emissions Trading and Operational Flexibility

- 2.13. The permittee is allowed to make a limited class of changes under section 502(b)(10) of the Clean Air Act within this permitted facility that contravene the specific terms of this permit without applying for a permit revision, provided:
- 2.13.1. The changes do not exceed the emissions allowable under this permit (whether expressed therein as a rate of emissions or in terms of total emissions);
 - 2.13.2. The changes are not modifications under any provision of Title I of the Clean Air Act;
 - 2.13.3. The changes do not violate applicable requirements;
 - 2.13.4. The changes do not contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
 - 2.13.5. The permittee sends a notice to the EPA, at least seven days in advance of any change made under this provision, that describes the change, when it will occur and any change in emissions and identifies any permit terms or conditions made inapplicable as a result of the change and the permittee attaches each notice to its copy of this permit; and
 - 2.13.6. The changes are not covered by a permit shield provided under 40 CFR 71.6(f) and Conditions 2.4 and 2.5 of this permit.

[40 CFR 71.6(a)(13)(i) and 71.6(c)(1)]

- 2.14. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. [40 CFR 71.6(a)(8)]

Severability

- 2.15. The provisions of this permit are severable, and in the event of any challenge to any portion of this permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force. [40 CFR 71.6(a)(5)]

Property Rights

- 2.16. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 71.6(a)(6)(iv)]

3. General Requirements

General Compliance Schedule

- 3.1. For applicable requirements with which the source is in compliance, the permittee will continue to comply with such requirements. [40 CFR 71.6(c)(3) and 71.5(c)(8)(iii)(A)]
- 3.2. For applicable requirements that will become effective during the permit term, the permittee shall meet such requirements on a timely basis. [40 CFR 71.6(c)(3) and 71.5(c)(8)(iii)(B)]

Inspection and Entry

- 3.3. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the EPA or an authorized representative to perform the following:
- 3.3.1. Enter upon the permittee's premises where a Part 71 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
 - 3.3.2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
 - 3.3.3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 - 3.3.4. As authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
- [40 CFR 71.6(c)(2)]

Open Burning Restrictions

- 3.4. Except as exempted in 40 CFR 49.131(c), the permittee shall not openly burn, or allow the open burning of, the following materials:
- 3.4.1. Garbage;
 - 3.4.2. Dead animals or parts of dead animals;
 - 3.4.3. Junked motor vehicles or any materials resulting from a salvage operation;
 - 3.4.4. Tires or rubber materials or products;
 - 3.4.5. Plastics, plastic products, or styrofoam;

- 3.4.6. Asphalt or composition roofing, or any other asphaltic material or product;
- 3.4.7. Tar, tarpaper, petroleum products, or paints;
- 3.4.8. Paper, paper products, or cardboard other than what is necessary to start a fire or that is generated at single-family residences or residential buildings with four or fewer dwelling units and is burned at the residential site;
- 3.4.9. Lumber or timbers treated with preservatives;
- 3.4.10. Construction debris or demolition waste;
- 3.4.11. Pesticides, herbicides, fertilizers, or other chemicals;
- 3.4.12. Insulated wire;
- 3.4.13. Batteries;
- 3.4.14. Light bulbs;
- 3.4.15. Materials containing mercury (e.g., thermometers);
- 3.4.16. Asbestos or asbestos-containing materials;
- 3.4.17. Pathogenic wastes;
- 3.4.18. Hazardous wastes; or
- 3.4.19. Any material other than natural vegetation that normally emits dense smoke or noxious fumes when burned.

[40 CFR 49.131(c) and (d)(1)]

3.5. Open burning shall be conducted as follows:

- 3.5.1. All materials to be openly burned shall be kept as dry as possible through the use of a cover or dry storage;
- 3.5.2. Before igniting a burn, noncombustibles shall be separated from the materials to be openly burned to the greatest extent practicable;
- 3.5.3. Natural or artificially induced draft shall be present, including the use of blowers or air curtain incinerators where practicable;
- 3.5.4. To the greatest extent practicable, materials to be openly burned shall be separated from the grass or peat layer; and
- 3.5.5. A fire shall not be allowed to smolder.

[40 CFR 49.131(e)(1)]

3.6. Except for exempted fires set for cultural or traditional purposes, a person shall not initiate any open burning when:

- 3.6.1. The Regional Administrator has declared a burn ban; or
- 3.6.2. An air stagnation advisory has been issued or an air pollution alert, warning or emergency has been declared by the Regional Administrator.

[40 CFR 49.131(d)(2), (d)(3) and (e)(2), and 49.137(c)(4)(i)]

3.7. Except for exempted fires set for cultural or traditional purposes, any person conducting open burning when such an advisory is issued or declaration is made shall either immediately extinguish the fire, or immediately withhold additional material such that the fire burns down.

[40 CFR 49.131(e)(3) and 49.137(c)(4)(ii)]

- 3.8. Nothing in this section exempts or excuses any person from complying with applicable laws and ordinances of local fire departments and other governmental jurisdictions.

[40 CFR 49.131(d)(4)]

Visible Emissions Limits

- 3.9. Except as provided for in Conditions 3.10 and 3.11, the visible emissions from any air pollution source that emits, or could emit, particulate matter or other visible air pollutants shall not exceed 20% opacity, averaged over any consecutive six-minute period. Compliance with this emission limit is determined as follows:

- 3.9.1. Using EPA Reference Method 9 found in Appendix A of 40 CFR Part 60; or
- 3.9.2. Alternatively, using a continuous opacity monitoring system that complies with Performance Specification 1 found in Appendix B of 40 CFR Part 60.

[40 CFR 49.124(d)(1) and (e)]

- 3.10. The requirements of Condition 3.9 do not apply to open burning, agricultural activities, forestry and silvicultural activities, non-commercial smoke houses, sweat houses or lodges, smudge pots, furnaces and boilers used exclusively to heat residential buildings with four or fewer dwelling units, or emissions from fuel combustion in mobile sources.

[40 CFR 49.124(c)]

- 3.11. Exception to the visible emission limit in Condition 3.9 includes:

- 3.11.1. The visible emissions from an air pollution source may exceed the 20% opacity limit if the owner or operator of the air pollution source demonstrates to the Regional Administrator's satisfaction that the presence of uncombined water, such as steam, is the only reason for the failure of an air pollution source to meet the 20% opacity limit.

[40 CFR 49.124(d)(2)]

Fugitive Particulate Matter Requirements and Recordkeeping

- 3.12. Except as provided for in Condition 3.17, the permittee shall take all reasonable precautions to prevent fugitive particulate matter emissions and shall maintain and operate all pollutant-emitting activities to minimize fugitive particulate matter emissions. Reasonable precautions include, but are not limited to the following:

- 3.12.1. Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, grading of roads, or clearing of land;
- 3.12.2. Application of asphalt, oil (but not used oil), water, or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces that can create airborne dust;
- 3.12.3. Full or partial enclosure of materials stockpiles in cases where application of oil, water, or chemicals is not sufficient or appropriate to prevent particulate matter from becoming airborne;
- 3.12.4. Implementation of good housekeeping practices to avoid or minimize the accumulation of dusty materials that have the potential to become airborne, and the prompt cleanup of spilled or accumulated materials;
- 3.12.5. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- 3.12.6. Adequate containment during sandblasting or other similar operations;

- 3.12.7. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne; and
- 3.12.8. The prompt removal from paved streets of earth or other material that does or may become airborne.

[40 CFR 49.126(d)(1) and (2)]

- 3.13. Once each calendar year, during typical operating conditions and meteorological conditions conducive to producing fugitive dust, the permittee shall survey the facility to determine the sources of fugitive particulate matter emissions. For new sources or new operations, a survey shall be conducted within 30 days after commencing operation.

- 3.13.1. The permittee shall record the results of the survey, including the date and time of the survey and identification of any sources of fugitive particulate matter emissions found; and

- 3.13.2. If sources of fugitive particulate matter emissions are present, the permittee shall determine the reasonable precautions that will be taken to prevent fugitive particulate matter emissions.

[40 CFR 49.126(e)(1)(i) and (ii)]

- 3.14. The permittee shall prepare, and update as necessary following each survey, a written plan that specifies the reasonable precautions that will be taken and the procedures to be followed to prevent fugitive particulate matter emissions, including appropriate monitoring and recordkeeping.

- 3.14.1. For construction or demolition activities, a written plan shall be prepared prior to commencing construction or demolition.

[40 CFR 49.126(e)(1)(iii)]

- 3.15. The permittee shall implement the written plan and maintain and operate all sources to minimize fugitive particulate matter emissions.

[40 CFR 49.126(e)(1)(iv)]

- 3.16. Efforts to comply with this section cannot be used as a reason for not complying with other applicable laws and ordinances.

[40 CFR 49.126(e)(3)]

- 3.17. The requirements of Conditions 3.12 through 3.16 do not apply to open burning, agricultural activities, forestry and silvicultural activities, sweat houses or lodges, non-commercial smoke houses, or activities associated with single-family residences or residential buildings with four or fewer dwelling units.

[40 CFR 49.126(c)]

Other Work Practice Requirements and Recordkeeping

- 3.18. The permittee shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR Part 68 no later than the latest of the following dates:

- 3.18.1. Three years after the date on which a regulated substance, present above the threshold quantity in a process, is first listed under 40 CFR 68.130; or

- 3.18.2. The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10 and 68.215(a)(1)]

- 3.19. Except as provided for motor vehicle air conditioners (MVACs) in 40 CFR Part 82, Subpart B, the permittee shall comply with the stratospheric ozone and climate protection standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.

- 3.19.1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- 3.19.2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- 3.19.3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
- 3.19.4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" is defined at 40 CFR 82.152.)
- 3.19.5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156.
- 3.19.6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

[40 CFR Part 82, Subpart F]

- 3.20. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the MVAC, the permittee must comply with all the applicable requirements for stratospheric ozone and climate protection as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

[40 CFR Part 82, Subpart B]

- 3.21. The permittee shall comply with 40 CFR Part 61, Subpart M for asbestos removal and disposal when conducting any renovation or demolition at the facility. [40 CFR Part 61, Subpart M]

General Testing and Associated Recordkeeping and Reporting

- 3.22. In addition to the specific testing requirements contained in the facility and emission unit-specific sections of this permit, the permittee shall comply with the generally applicable testing requirements in Conditions 3.23 through 3.30 whenever conducting a performance test required by this permit unless specifically stated otherwise in this permit.

[40 CFR 71.6(a)(3) and 71.6(c)(1)]

- 3.23. Test Notification. The permittee shall provide the EPA at least 30 days prior notice of any performance test, except as otherwise specified in this permit, to afford the EPA the opportunity to have an observer present. If after 30-day notice for an initially scheduled performance test, there is a delay in conducting the scheduled performance test, the permittee shall notify the EPA as soon as possible of any delay in the original test date, either by providing at least seven days prior notice of the rescheduled date of the performance test, or by arranging a rescheduled date with the EPA by mutual agreement.

[40 CFR 71.6(a)(3) and 71.6(c)(1)]

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

- 3.24.1. Purpose and scope of testing;
- 3.24.2. Source description, including a description of the operating scenarios and mode of operation during testing and including fuel sampling and analysis procedures;
- 3.24.3. Schedule/dates of testing;

- 3.24.4. Process data to be collected during the test and reported with the results, including source-specific data identified in the facility or emission unit-specific sections of this permit;
 - 3.24.5. Sampling and analysis procedures, specifically requesting approval for any proposed alternatives to the reference test methods, and addressing minimum test length (e.g., one hour, eight hours, 24 hours, etc.) and minimum sample volume;
 - 3.24.6. Sampling location description and compliance with the reference test methods;
 - 3.24.7. Analysis procedures and laboratory identification;
 - 3.24.8. Quality assurance plan;
 - 3.24.9. Calibration procedures and frequency;
 - 3.24.10. Sample recovery and field documentation;
 - 3.24.11. Chain of custody procedures;
 - 3.24.12. Quality assurance/quality control project flow chart;
 - 3.24.13. Data processing and reporting;
 - 3.24.14. Description of data handling and quality control procedures; and
 - 3.24.15. Report content and timing.
- [40 CFR 71.6(a)(3) and 71.6(c)(1)]
- 3.25. Facilities for performing and observing the emission testing shall be provided that meet the requirements of 40 CFR 60.8(e) and Reference Method 1 (40 CFR Part 60, Appendix A).
[40 CFR 71.6(a)(3) and 71.6(c)(1)]
 - 3.26. Unless the EPA determines in writing that other operating conditions are representative of normal operations or unless specified in the facility or emission unit-specific sections of this permit, the source shall be operated at a capacity of at least 90% but no more than 100% of maximum during all tests.
[40 CFR 71.6(a)(3) and 71.6(c)(1)]
 - 3.27. Only regular operating staff may adjust the processes or emission control devices during or within two hours prior to the start of a source test. Any operating adjustments made during a source test, that are a result of consultation during the tests with source testing personnel, equipment vendors, or consultants, may render the source test invalid.
[40 CFR 71.6(a)(3) and 71.6(c)(1)]
 - 3.28. Each source test shall follow the reference test methods specified by this permit and consist of at least three valid test runs.
 - 3.28.1. If the reference test method yields measured pollutant concentration values at an oxygen concentration other than specified in the emission standard, the permittee shall correct the measured pollutant concentration to the oxygen concentration specified in the emission standard by using the following equation:

$$PC_X = PC_M \times \frac{(20.9 - X)}{(20.9 - Y)}$$

Where: PC_X = Pollutant concentration at X percent;
 PC_M = Pollutant concentration as measured;
 X = Oxygen concentration specified in the standard; and

Y = Measured average volumetric oxygen concentration.

[40 CFR 71.6(a)(3)(i)(B) and 71.6(c)(1)]

- 3.28.2. Source test emission data shall be reported as the arithmetic average of all valid test runs and in the terms of any applicable emission limit, unless otherwise specified in the facility or emission unit-specific sections of this permit.

[40 CFR 71.6(a)(3) and 71.6(c)(1)]

- 3.29. Test Records. For the duration of each test run (unless otherwise specified), the permittee shall record the following information:

- 3.29.1. All data which is required to be monitored during the test in the facility or emission unit-specific sections of this permit; and
- 3.29.2. All continuous monitoring system data (CMS) which is required to be routinely monitored in the facility or emission unit-specific sections of this permit for the emission unit being tested.

[40 CFR 71.6(a)(3) and 71.6(c)(1)]

- 3.30. Test Reports. Unless the EPA approves in writing a different due date, emission test reports shall be submitted to the EPA within 60 days of completing any emission test required by this permit along with data required to be recorded in Condition 3.29 above.

[40 CFR 71.6(a)(3) and 71.6(c)(1)]

General Recordkeeping

- 3.31. Monitoring Records. In addition to specific recordkeeping requirements contained in the source-wide and emission unit-specific conditions of the permit, the permittee shall, where applicable, keep records of required monitoring information that include the following:

- 3.31.1. The date, place, and time of sampling or measurements;
- 3.31.2. The date(s) analyses were performed;
- 3.31.3. The company or entity that performed the analyses;
- 3.31.4. The analytical techniques or methods used;
- 3.31.5. The results of such analyses; and,
- 3.31.6. The operating conditions as existing at the time of sampling or measurement.

[40 CFR 71.6(a)(3)(ii)(A)]

- 3.32. Off-Permit Change Records. The permittee shall keep a record describing all off-permit changes allowed to be made under Condition 2.12 that result in emissions of any regulated air pollutant subject to any applicable requirement not otherwise regulated under this permit, and the emissions resulting from those changes.

[40 CFR 71.6(a)(12)(iv)]

- 3.33. Open Burning Records. For any open burning allowed under Conditions 3.4 through 3.8, the permittee shall document the following:

- 3.33.1. The date that burning was initiated;
- 3.33.2. The duration of the burn;
- 3.33.3. The measures taken to comply with each provision of Condition 3.5; and
- 3.33.4. The measures taken to ensure that materials prohibited in Condition 3.4 were not burned.

[40 CFR 71.6(a)(3)(i)(B) and 71.6(c)(1)]

- 3.34. Fee Records. The permittee shall retain in accordance with the provisions of Condition 3.35 of this permit, all work sheets and other materials used to determine fee payments. Records shall be retained for five years following the year in which the emissions data is submitted. [40 CFR 71.9(i)]
- 3.35. Records Maintenance and Retention. The permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by this permit recorded in a permanent form suitable for inspection. The permittee shall retain records of all required monitoring data and support information for a period of at least five years from the date of the monitoring sample, measurement, recording, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 71.6(a)(3), 71.6(c)(1), 49.126(e)(1)(v) and 49.130(f)(2)]

General Reporting

- 3.36. Additional Information. The permittee shall furnish to the EPA, within a reasonable time, any information that the EPA may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the EPA copies of records that are required to be kept pursuant to the terms of the permit, including information claimed to be confidential. Information claimed to be confidential must be accompanied by a claim of confidentiality according to the provisions of 40 CFR Part 2, Subpart B. [40 CFR 71.6(a)(6)(v) and 71.5(a)(3)]
- 3.37. Corrections. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. Supplementary facts and corrected information submitted pursuant to this permit condition shall be sent to EPA at the following address. A copy of each document submitted to EPA that does not contain CBI shall be sent to the Tribal address below:

Original documents go to the EPA at:

Part 71 Air Quality Permits
U.S. EPA - Region 10, 15-H13
1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3188

Copies go to Tribe at:

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

[40 CFR 71.5(b)]

- 3.38. Off-Permit Change Report. The permittee shall provide contemporaneous written notice to the EPA of each off-permit change allowed to be made under Condition 2.12, except for changes that qualify as insignificant activities under 40 CFR 71.5(c)(11). The written notice shall describe each change, the date of the change, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change. [40 CFR 71.6(a)(12)]
- 3.39. Section 502(b)(10) Change Report. The permittee is required to send a notice to the EPA at least 7 days in advance of any section 502(b)(10) change allowed to be made under Condition 2.13. The notice must describe the change, when it will occur and any change in emissions, and identify any permit terms or conditions made inapplicable as a result of the change. The permittee shall attach each notice to its copy of this permit. [40 CFR 71.6(a)(13)(i)(A) and 71.6(c)(1)]
- 3.40. Address. Unless otherwise specified in this permit, any documents required to be submitted under this permit, including reports, test data, monitoring data, notifications, compliance certifications,

and fee calculation worksheets shall be submitted to the EPA address below. A copy of each document submitted to the EPA that does not contain confidential business information shall be sent to the Tribal address below:

Original documents go to the EPA at:

Clean Air Act Compliance Manager
U.S. EPA - Region 10, 20-C04
1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3188

Copies go to Tribe at:

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

[40 CFR 71.5(d), 71.6(c)(1) and 71.9(h)(2)]

Part 71 Emission and Fee Reporting

- 3.41. Part 71 Annual Emission Report. No later than the date specified in Condition 4.1 of each year, the permittee shall submit to the EPA an annual report of actual emissions for the preceding calendar year. [40 CFR 71.9(h)(1)]

3.41.1. “Actual emissions” means the actual rate of emissions in tons per year of any “regulated pollutant (for fee calculation),” as defined in 40 CFR 71.2, emitted from a Part 71 source over the preceding calendar year. Actual emissions shall be calculated using each emissions unit’s actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted during the preceding calendar year. [40 CFR 71.9(c)(6)]

3.41.2. Actual emissions shall be computed using methods required by the permit for determining compliance. [40 CFR 71.9(h)(3)]

3.41.3. Actual emissions shall include fugitive emissions. [40 CFR 71.9(c)(1)]

- 3.42. Part 71 Fee Calculation Worksheet. Based on the annual emission report required in Condition 3.41 and no later than the date specified in Condition 4.1 of each year, the permittee shall submit to the EPA a fee calculation worksheet (blank forms provided by the EPA) and a photocopy of each fee payment check (or other confirmation of actual fee paid). [40 CFR 71.9(c)(1), 71.9(e)(1) and 71.9(h)(1)]

3.42.1. The annual emissions fee shall be calculated by multiplying the total tons of actual emissions of each “regulated pollutant (for fee calculation),” emitted from the source by the presumptive emission fee (in dollars/ton) in effect at the time of calculation. The presumptive emission fee is revised each calendar year and is available from the EPA prior to the start of each calendar year. [40 CFR 71.9(c)(1)]

3.42.2. The permittee shall exclude the following emissions from the calculation of fees:

3.42.2.1 The amount of actual emissions of each regulated pollutant (for fee calculation) that the source emits in excess of 4,000 tons per year;

3.42.2.2 Actual emissions of any regulated pollutant (for fee calculation) already included in the fee calculation; and

3.42.2.3 The insignificant quantities of actual emissions not required to be listed or calculated in a permit application pursuant to 40 CFR 71.5(c)(11).

[40 CFR 71.9(c)(5)]

- 3.43. Part 71 Annual Fee Payment. No later than the date specified in Condition 4.1 of each year, the permittee shall submit to the EPA full payment of the annual permit fee based on the fee calculation worksheet required in Condition 3.42. [40 CFR 71.9(a), 71.9(c)(1) and 71.9(h)(1)]

3.43.1. The fee payment and a completed fee filing form shall be sent to:

U.S.EPA
OCFO/OC/ACAD/FCB
Attn: Collections Team
1300 Pennsylvania Ave NW
Mail Code 2733R
Washington, DC 20004

[40 CFR 71.9(k)(2)]

3.43.2. The fee payment shall be in United States currency and shall be paid by money order, bank draft, certified check, corporate check, or electronic funds transfer payable to the order of the U.S. Environmental Protection Agency. [40 CFR 71.9(k)(1)]

3.43.3. The permittee, when notified by the EPA of additional amounts due, shall remit full payment within 30 days of receipt of an invoice from the EPA. [40 CFR 71.9(j)(2)]

3.43.4. If the permittee thinks an EPA assessed fee is in error and wishes to challenge such fee, the permittee shall provide a written explanation of the alleged error to the EPA along with full payment of the EPA assessed fee. [40 CFR 71.9(j)(3)]

3.43.5. Failure of the permittee to pay fees in a timely manner shall subject the permittee to assessment of penalties and interest in accordance with 40 CFR 71.9(l). [40 CFR 71.9(l)]

3.44. The annual emission report and fee calculation worksheet (and photocopy of each fee payment check), required in Conditions 3.41 and 3.42, shall be submitted to the EPA at the address listed in Condition 3.40 of this permit.¹ [40 CFR 71.9(k)(1)]

3.45. The annual emission report and fee calculation worksheet (and photocopy of each fee payment check), required in Conditions 3.41 and 3.42, shall be certified by a responsible official in accordance with Condition 3.50 of this permit. [40 CFR 71.9(h)(2)]

Annual Registration

3.46. The permittee shall submit an annual registration report that consists of estimates of the total actual emissions from the air pollution source for the following air pollutants: PM, PM₁₀, PM_{2.5}, SO_x, NO_x, CO, VOC, lead and lead compounds, ammonia, fluorides (gaseous and particulate), sulfuric acid mist, hydrogen sulfide, total reduced sulfur, and reduced sulfur compounds, including all calculations for the estimates. Emissions shall be calculated using the actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted during the preceding calendar year. [40 CFR 49.138(e)(3)(xii), (e)(4) and (f)]

3.46.1. The emission estimates required by Condition 3.46 shall be based upon actual test data or, in the absence of such data, upon procedures acceptable to the Regional Administrator. Any emission estimates submitted to the Regional Administrator shall be verifiable using currently accepted engineering criteria. The following procedures are generally acceptable for estimating emissions from air pollution sources:

3.46.1.1 Source-specific emission tests;

3.46.1.2 Mass balance calculations;

¹ The permittee should note that an annual emissions report, required at the same time as the fee calculation worksheet by 40 CFR 71.9(h), has been incorporated into the fee calculation worksheet.

- 3.46.1.3 Published, verifiable emission factors that are applicable to the source;
- 3.46.1.4 Other engineering calculations; or
- 3.46.1.5 Other procedures to estimate emissions specifically approved by the Regional Administrator.

[40 CFR 49.138(e)(4) and (f)]

- 3.46.2. The annual registration report shall be submitted with the annual emission report and fee calculation worksheet required by Conditions 3.41 and 3.42 of this permit. The permittee may submit a single combined report provided that the combined report clearly identifies which emissions are the basis for the annual registration report, the Part 71 annual emission report, and the Part 71 fee calculation worksheet. All registration information and reports shall be submitted on forms provided by the Regional Administrator.

[40 CFR 49.138(d) and (f)]

Periodic and Deviation Reporting

- 3.47. Semi-Annual Monitoring Report. The permittee shall submit to the EPA reports of any required monitoring for each six-month reporting period from July 1 to December 31 and from January 1 to June 30. All reports shall be submitted to the EPA and shall be postmarked by the 60th day following the end of the reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with Condition 3.50.

[40 CFR 71.6(a)(3)(iii)(A)]

- 3.48. Deviation Report. The permittee shall promptly report to the EPA, by telephone, deviations from permit conditions, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. The report shall be made using the following numbers (206) 553-1331.

[40 CFR 71.6(a)(3)(iii)(B)]

- 3.48.1. For the purposes of Conditions 3.47 and 3.48, deviation means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or record keeping required by this permit. For a situation lasting more than 24 hours, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:

- 3.48.1.1 A situation where emissions exceed an emission limitation or standard;
- 3.48.1.2 A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met;
- 3.48.1.3 A situation in which observations or data collected demonstrate noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit (including indicators of compliance revealed through parameter monitoring);
- 3.48.1.4 A situation in which any testing, monitoring, recordkeeping or reporting required by this permit is not performed or not performed as required;
- 3.48.1.5 A situation in which an exceedance or an excursion, as defined in 40 CFR Part 64, occurs; and
- 3.48.1.6 Failure to comply with a permit term that requires submittal of a report.

[40 CFR 71.6(a)(3)(iii)(C) and 71.6(c)(1)]

3.48.2. For the purpose of Condition 3.48 of the permit, prompt is defined as any definition of prompt or a specific time frame for reporting deviations provided in an underlying applicable requirement as identified in this permit. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:

3.48.2.1 For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence;

3.48.2.2 For emissions of any regulated pollutant excluding those listed in Condition 3.48.2.1 above, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours of the occurrence; or

3.48.2.3 For all other deviations from permit requirements, the report shall be submitted with the semi-annual monitoring report required in Condition 3.47.

[40 CFR 71.6(a)(3)(iii)(B)]

3.48.3. Within ten working days of the occurrence of a deviation as provided in Condition 3.48.2.1 or 3.48.2.2 above, the permittee shall also submit a written notice, which shall include a narrative description of the deviation and updated information as listed in Condition 3.48, to the EPA, certified consistent with Condition 3.50 of this permit.

[40 CFR 71.6(a)(3)(i)(B) and (iii)(B), 71.6(c)(1)]

Annual Compliance Certification

3.49. The permittee shall submit to the EPA a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, postmarked by February 28 of each year and covering the permit or permits in effect during the previous calendar year. The compliance certification shall be certified as to truth, accuracy, and completeness by a responsible official consistent with Condition 3.50 of this permit.

[40 CFR 71.6(c)(5)]

3.49.1. The annual compliance certification shall include the following:

3.49.1.1 The identification of each permit term or condition that is the basis of the certification;

3.49.1.2 The identification of the method(s) or other means used by the permittee for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required in this permit. If necessary, the permittee also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Clean Air Act, which prohibits knowingly making a false certification or omitting material information; and

3.49.1.3 The status of compliance with each term and condition of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred.

[40 CFR 71.6(c)(5)(iii) and 71.6(c)(1)]

Document Certification

- 3.50. Any document required to be submitted under this permit shall be certified by a responsible official as to truth, accuracy, and completeness. Such certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. [40 CFR 71.5(d), 71.6(c)(1) and 71.9(h)(2)]

Permit Renewal

- 3.51. The permittee shall submit a timely and complete application for permit renewal at least six months, but not more than 18 months, prior to the date of expiration of this permit. Applications for permit renewal shall be sent to the EPA at the following address. A copy of each document submitted to the EPA that does not contain CBI shall be sent to the Tribal address below:

Original documents go to the EPA at: Copies go to the Tribe at:

Part 71 Air Quality Permits
U.S. EPA – Region 10, 15-H13
1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3188

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

[40 CFR 71.5(a)(1)(iii), 71.7(b) and 71.7(c)(1)(ii)]

- 3.52. The application for renewal shall include the current permit number, a description of permit revisions and off-permit changes that occurred during the permit term and were not incorporated into the permit during the permit term, any applicable requirements that were promulgated and not incorporated into the permit during the permit term, and other information required by the application form. [40 CFR 71.5(a)(2) and 71.5(c)(5)]

4. Facility-Specific Requirements**Fees and Emission Reports Due Date**

- 4.1. Unless otherwise specified, fees and emission reports required by this permit are due annually on April 1. [40 CFR 71.9(a) and 71.9(h)]

Fuel Sulfur Limits

- 4.2. The permittee shall not sell, distribute, use, or make available for use any gaseous fuel that contains more than 1.1 grams of sulfur per dry standard cubic meter of gaseous fuel.

[40 CFR 49.130(d)(8)]

- 4.2.1. Compliance with the sulfur limit is determined using ASTM methods D1072-90 (Reapproved 1999), D3246-96, D4084-94 (Reapproved 1999), D5504-01, D4468-85 (Reapproved 2000), D2622-03, and D6228-98 (Reapproved 2003) (incorporated by reference, see 49.123(e)). [40 CFR 49.130(e)(4)]

Fuel Sulfur Monitoring and Recordkeeping

- 4.3. The permittee shall either obtain, record, and keep records of the sulfur content from the vendor, or continuously monitor the sulfur content of the fuel gas line using a method that meets the requirements of Performance Specification 5, 7, 9, or 15 (as applicable for the sulfur compounds in the gaseous fuel) of appendix B and appendix F of 40 CFR Part 60. If only purchased natural gas is

used, then keep records showing that the gaseous fuel meets the definition of natural gas in 40 CFR 72.2. [40 CFR 49.130(f)(1)(ii)]

Visible and Fugitive Emission Monitoring and Recordkeeping

- 4.4. Once each calendar quarter, the permittee shall visually survey each emission unit and any other pollutant emitting activity for the presence of visible emissions or fugitive emissions of particulate matter.
 - 4.4.1. The observer conducting the visual survey must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting and wind, and the presence of uncombined water on the visibility of emissions (see 40 CFR Part 60, Appendix A, Method 22).
 - 4.4.2. For the surveys, the observer shall select a position that enables a clear view of the emission point to be surveyed, that is at least 15 feet, but not more than 0.25 miles, from the emission point, and where the sunlight is not shining directly in the observer's eyes.
 - 4.4.3. The observer shall continuously watch for visible emissions from each potential emission point for at least 15 seconds.
 - 4.4.4. Any observed visible emissions or fugitive emissions of particulate matter (other than uncombined water) shall be recorded as a positive reading associated with the emission unit or pollutant emitting activity.
 - 4.4.5. Surveys shall be conducted while the emission unit or pollutant emitting activity is operating, and during daylight hours.

[40 CFR 71.6(a)(3)(i)(B)]
- 4.5. If the survey conducted pursuant to Condition 4.4 identifies any visible emissions or fugitive emissions of particulate matter, the permittee shall:
 - 4.5.1. Immediately upon conclusion of the visual survey in Condition 4.4, investigate the source and reason for the presence of visible emissions or fugitive emissions; and
 - 4.5.2. As soon as practicable, take appropriate corrective action.

[40 CFR 71.6(a)(3)(i)(B)]
- 4.6. If the corrective actions undertaken pursuant to Condition 4.5.2 do not eliminate the visible or fugitive emissions, the permittee shall within 24 hours of the visual survey in Condition 4.4 determine the opacity of the emissions in question, for a 30-minute duration, using the procedures specified in Condition 3.9.1.

[40 CFR 71.6(a)(3)(i)(B)]
- 4.7. If any 6-minute average opacity determined pursuant to Condition 4.6 or 4.8 is greater than 20%, the permittee shall determine the opacity of the emissions in question daily, for a 30-minute duration each day, using the procedures specified in Condition 3.9.1 until no 6-minute average opacity is greater than 20% for two consecutive days.

[40 CFR 71.6(a)(3)(i)(B)]
- 4.8. If the opacity determination required in Condition 4.6, or if two consecutive daily opacity determinations required by Condition 4.7, indicate no 6-minute average opacity greater than 20%, the permittee shall determine opacity of the emissions in question weekly, for a 30-minute duration each week, for three additional weeks using the procedures specified in Condition 3.9.1.

[40 CFR 71.6(a)(3)(i)(B)]
- 4.9. The permittee shall maintain records of the following:

- 4.9.1. Details of each visual survey, including date, time, observer and results for each emission unit and any other pollutant emitting activity;
- 4.9.2. Date, time and type of any investigation conducted pursuant to Condition 4.5.1;
- 4.9.3. Findings of the investigation, including the reasons for the presence of visible emissions or fugitive emissions of particulate matter;
- 4.9.4. Date, time and type of corrective actions taken pursuant to Condition 4.5.2;
- 4.9.5. Field, observation and data reduction records for any EPA Reference Method 9 determination conducted on the source of visible or fugitive emissions pursuant to Conditions 4.6 through 4.8.

[40 CFR 71.6(a)(3)(i)(B)]

- 4.10. Any 6-minute average opacity determined to be in excess of 20% is a deviation and subject to the provisions of Conditions 3.47 and 3.48.

[40 CFR 71.6(a)(3)(i)(B)]

Monitoring for Modifications to the Facility not Undergoing PSD Review

- 4.11. Where there is a reasonable possibility (as defined in 40 CFR 52.21(r)(6)(vi)) that a project (other than projects at a source with a plantwide applicability limitation) that is not a part of a major modification may result in a significant emissions increase of any regulated NSR pollutant and the permittee elects to use the method specified in 40 CFR 52.21(b)(41)(ii)(a) through (c) for calculating projected actual emissions, the permittee shall perform the following:
 - 4.11.1. Before beginning actual construction of the project, document and maintain a record of the following information.
 - 4.11.1.1 A description of the project.
 - 4.11.1.2 Identification of the emissions unit(s) whose emissions of a regulated NSR pollutant could be affected by the project.
 - 4.11.1.3 A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions, the projected actual emissions, the amount of emissions excluded under 40 CFR 52.21(b)(41)(ii)(c) and an explanation for why such amount was excluded, and any netting calculations, if applicable.
 - 4.11.2. Monitor the emission of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any emissions unit identified in Condition 4.11.1.2; and calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five years following resumption of regular operations after the change, or for a period of ten years following resumption of regular operations after the change if the project increases the design capacity or potential to emit of that regulated NSR pollutant at such emissions unit.

[40 CFR 52.21(r)(6)]

Reporting for Modifications to the Facility not Undergoing PSD Review

- 4.12. If monitoring and recordkeeping is required in Condition 4.11.2, the permittee shall report to the EPA when the annual emissions, in tons per year, from the project identified in Condition 4.11.1.1 exceed the baseline actual emissions as documented and maintained pursuant to Condition 4.11.1.3

by a significant amount (as defined in 40 CFR 52.21(b)(23)) for that regulated NSR pollutant, and when such emissions differ from the preconstruction projection as documented and maintained pursuant to Condition 4.11.1.3. Such report shall be submitted to the EPA within 60 days after the end of such year. The report shall contain the following.

- 4.12.1. The name, address and telephone number of the major stationary source.
- 4.12.2. The annual emissions as calculated pursuant to Condition 4.11.2.
- 4.12.3. Any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).

[40 CFR 52.21(r)(6)]

NSPS Work Practice Requirements (for Boilers #2-4)

- 4.13. NSPS Good Air Pollution Control Practices. At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the EPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [40 CFR 60.11(d)]
- 4.14. NSPS Credible Evidence. For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in Part 60, nothing in Part 60 shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. [40 CFR 60.11(g)]
- 4.15. NSPS Circumvention. The permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable NSPS standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged to the atmosphere. [40 CFR 60.12]

NSPS Recordkeeping Requirements (for Boilers #2-4)

- 4.16. NSPS Records of Startup, Shutdown and Malfunction. The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility. [40 CFR 60.7(b)]
- 4.17. NSPS Records Maintenance. The permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by the applicable NSPS recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records. [40 CFR 60.7(f)]

NSPS Reporting Requirements (for Boilers #2-4)

- 4.18. NSPS Notification and Reporting Time Periods. For the purposes of the applicable NSPS, time periods specified in days shall be measured in calendar days, even if the word “calendar” is absent, unless otherwise specified in an applicable requirement. [40 CFR 60.19(a)]

- 4.19. NSPS Notification and Reporting Postmarks. For the purposes of the applicable NSPS, if an explicit postmark deadline is not specified in an applicable requirement for the submittal of a notification, application, report, or other written communication to the Administrator, the permittee shall postmark the submittal on or before the number of days specified in the applicable requirement. For example, if a notification must be submitted 15 days before a particular event is scheduled to take place, the notification shall be postmarked on or before 15 days preceding the event; likewise, if a notification must be submitted 15 days after a particular event takes place, the notification shall be delivered or postmarked on or before 15 days following the end of the event. The use of reliable non-Government mail carriers that provide indications of verifiable delivery of information required to be submitted to the Administrator, similar to the postmark provided by the U.S. Postal Service, or alternative means of delivery, including the use of electronic media, agreed to by the permitting authority, is acceptable. [40 CFR 60.19(b)]
- 4.20. NSPS Notification of Modifications to the Facility. A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which an NSPS applies, unless that change is specifically exempted under an applicable NSPS or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional relevant information subsequent to this notice. [40 CFR 60.7(a)(4)]

NESHAP Work Practice Requirements

- 4.21. NESHAP Circumvention. The permittee shall not build, erect, install, or use any article, machine, equipment, or process to conceal an emission that would otherwise constitute noncompliance with a relevant NESHAP standard. Such concealment includes, but is not limited to, the use of diluents to achieve compliance with a relevant standard based on the concentration of a pollutant in the effluent discharged to the atmosphere and the use of gaseous diluents to achieve compliance with a relevant standard for visible emissions. [40 CFR 63.4(b)]

NESHAP Recordkeeping Requirements

- 4.22. NESHAP Malfunctions. The permittee shall maintain relevant records for the boilers of the occurrence and duration of each malfunction of operation (i.e., process equipment). [40 CFR 63.10(b)(2)(ii)]
- 4.23. NESHAP Records. The permittee shall maintain files of all information (including all reports and notifications) required a NESHAP Standard recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche. [40 CFR 63.10(b)(1)]
- 4.24. NESHAP Records. The permittee shall maintain relevant records for such source of all documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9 (see Condition 4.25). [40 CFR 63.10(b)(2)(xiv)]

NESHAP Notification and Reporting Requirements

- 4.25. Notification of Compliance Status. The permittee shall submit a notification of compliance status, signed by the responsible official who shall certify its accuracy, attesting to whether the source has complied, before the close of business on the 60th day following the completion of the relevant

compliance demonstration activity specified in Subpart DDDDD. Notifications may be combined as long as the due date requirement for each notification is met. The notification shall include:

[40 CFR 63.9(h)(2)(i) and (ii) and 63.9(h)(3)]

- 4.25.1. The methods that were used to determine compliance; [40 CFR 63.9(h)(2)(i)(A)]
 - 4.25.2. The results of any methods that were conducted including the oxygen concentration measured during each tune-up required in Condition 5.4 and used for the purpose of Condition 5.4.6; [40 CFR 63.9(h)(2)(i)(B), 71.6(c)(1)]
 - 4.25.3. The methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements; and [40 CFR 63.9(h)(2)(i)(C)]
 - 4.25.4. A statement by the permittee as to whether the source has complied with the relevant requirements. [40 CFR 63.9(h)(2)(i)(G)]
- 4.26. NESHAP Change in Information Already Provided. Any change in the information already provided under a NESHAP standard shall be provided to the Administrator in writing within 15 calendar days after the change. [40 CFR 63.9(j)]

5. Unit-Specific Requirements – Boilers #2-4

Boilers #2-4 Emission Limits and Work Practice Requirements

- 5.1. The permittee is prohibited from combusting any fuel other than propane in the boilers. [Section 304(f)(4) of the Federal Clean Air Act and 40 CFR 71.6(b)]
- 5.2. FARR SO₂ Emission Limit. Sulfur dioxide emissions from each boiler stack shall not exceed an average of 500 parts per million by volume, on a dry basis and corrected to seven percent oxygen, during any three-hour period.
 - 5.2.1. Compliance with the SO₂ limit is determined using EPA Reference Methods 6, 6A, 6B, and 6C as specified in the applicability section of each method (see 40 CFR Part 60, appendix A) or, alternatively, a continuous emission monitoring system (CEMS) that complies with Performance Specification 2 found in Appendix B of 40 CFR Part 60. [40 CFR 49.129(d)(1) and (e)]
- 5.3. FARR PM Emission Limit. Particulate matter emissions from each boiler stack shall not exceed an average of 0.23 grams per dry standard cubic meter (0.1 grains per dry standard cubic foot), corrected to seven percent oxygen, during any three-hour period.
 - 5.3.1. Compliance with the PM limit is determined using EPA Reference Method 5 (see 40 CFR Part 60, Appendix A). [40 CFR 49.125(d)(1) and (e)]
- 5.4. NESHAP Subpart DDDDD Tune-ups. The permittee shall tune up the boilers as specified in Conditions 5.4.1 through 5.4.7. [40 CFR 63.7495(b) and 7500(a)(1)]
 - 5.4.1. For the SLM boiler, the permittee shall complete an initial tune-up by following the procedures described in Condition 5.4.7 no later than 30 days after the re-start of the affected source. [63.7510(e) and 63.7510(j)]

- 5.4.2. For the LLM and the SLM boilers, the permittee shall conduct subsequent tune-ups of each boiler by following the procedures described in Condition 5.4.7 every five years to demonstrate continuous compliance.

[63.7540(a)(12)]

- 5.4.3. Each five-year tune-up shall be conducted no more than 61 months after the previous tune-up.

[63.7515(d)]

- 5.4.4. If the unit is not operating on the required date for a tune-up, the tune-up shall be conducted within 30 calendar days of startup.

[63.7515(g) and 63.7540(a)(13)]

- 5.4.5. The permittee may delay the burner inspection specified in Condition 5.4.7.1 until the next scheduled or unscheduled unit shutdown, but the permittee shall inspect each burner at least once every 72 months.

[63.7540(a)(12)]

- 5.4.6. The permittee shall set the oxygen level no lower than the oxygen concentration measured during the most recent tune-up.

[63.7540(a)(12)]

- 5.4.7. Tune-ups shall be conducted as follows:

- 5.4.7.1 As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;
- 5.4.7.2 Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
- 5.4.7.3 Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown);
- 5.4.7.4 Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications; and
- 5.4.7.5 Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.

[40 CFR 63.7540(a)(10)(i) to (v)]

- 5.5. NESHAP Subpart DDDDD Energy Assessment. The permittee shall complete the one-time energy assessment specified in Item 4 in Table 3 of 40 CFR Part 63 Subpart DDDDD, no later than January 31, 2016.

[40 CFR 63.7495(b), 63.7500(a)(1), 63.7510(e) and 63.7510(j)]

5.5.1. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in Conditions 5.5.1.1 to 5.5.1.8, satisfies the energy assessment requirement. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. The energy assessment must include the following with extent of the evaluation for Conditions 5.5.1.1 to 5.5.1.5 appropriate for the on-site technical hours listed in Condition 5.5.2:

- 5.5.1.1 A visual inspection of the boiler or process heater system.
- 5.5.1.2 An evaluation of operating characteristics of the boiler or process heater systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints.
- 5.5.1.3 An inventory of major energy use systems consuming energy from affected boilers and process heaters and which are under the control of the boiler/process heater owner/operator.
- 5.5.1.4 A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage.
- 5.5.1.5 A review of the facility's energy management practices and provide recommendations for improvements consistent with the definition of energy management practices, if identified.
- 5.5.1.6 A list of cost-effective energy conservation measures that are within the facility's control.
- 5.5.1.7 A list of the energy savings potential of the energy conservation measures identified.
- 5.5.1.8 A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

[40 CFR 63.7500(a)(1) and Item 4 in Table 3 to Subpart DDDDD]

5.5.2. The energy assessment will be 8 on-site technical labor hours in length maximum but may be longer at the discretion of the owner or operator of the affected source. Each boiler system(s) and any on-site energy use system(s) accounting for at least 50 percent of the affected boiler(s) energy (e.g., steam, hot water, process heat, or electricity) production, as applicable, will be evaluated to identify energy savings opportunities, within the limit of performing an 8-hour on-site energy assessment. [40 CFR 63.7575]

5.6. NESHAP Subpart DDDDD Good Air Pollution Control Practices. At all times, the permittee shall operate and maintain the boilers, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.7500(a)(3)]

Boilers #2-4 Monitoring and Recordkeeping Requirements

5.7. NSPS Subpart Dc Recordkeeping Requirements. Except as provided in Condition 5.7.1 and 5.7.2, the permittee shall record and maintain records of the amount of each fuel combusted during each operating day. [40 CFR 60.48c(g)(1)]

- 5.7.1. As an alternative, the permittee may elect to record and maintain records of the amount of each fuel combusted during each calendar month. [40 CFR 60.48c(g)(2)]
- 5.7.2. As an alternative, the permittee may elect to record and maintain records of the total amount of each fuel delivered to that property during each calendar month. [40 CFR 60.48c(g)(3)]
- 5.7.3. All records required under 40 CFR 60.48c (see Condition 5.7) shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record. [40 CFR 60.48c(i)]
- 5.8. **NESHAP Subpart DDDDD Records.** The permittee shall keep and maintain records as follows:
 - 5.8.1. A copy of each notification and report submitted to comply with NESHAP Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted according to the requirements in 40 CFR 63.10(b)(2)(xiv) (see Condition 4.24). [40 CFR 63.7555(a)(1)]
 - 5.8.2. Records of the calendar date, time, occurrence and duration of each startup and shutdown. [40 CFR 63.7555(i)]
 - 5.8.3. Records of the type(s) and amount(s) of fuels used during each startup and shutdown. [40 CFR 63.7555(j)]
 - 5.8.4. The permittee shall record the oxygen concentration measured during each tune-up required in Condition 5.4 and used for the purpose of Condition 5.4.6. [40 CFR 71.6(c)(1)]
 - 5.8.5. On-site and submitted, if requested by the Administrator, an annual report containing the following:
 - 5.8.5.1 The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler; and
 - 5.8.5.2 A description of any corrective actions taken as a part of the tune-up. [40 CFR 63.7540(a)(10)(vi)]
 - 5.8.6. Each record must be in a form suitable and readily available for expeditious review. Each record shall be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Each record shall be kept on site, or they shall be accessible from onsite (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. You can keep the records off site for the remaining 3 years. [40 CFR 63.7560(a) to (c)]

Boilers #2-4 Notification and Reporting Requirements

- 5.9. **NESHAP Subpart DDDDD Notification of Compliance Status.** The permittee shall submit all of the notifications in 40 CFR 63.9(b) through (h) (see Condition 4.25) by the dates specified. [40 CFR 63.7495(d) and 63.7545(a)]
 - 5.9.1. The notification shall include a description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit and a description of the fuel(s) burned. [40 CFR 63.7545(e)(1)]

5.9.2. In addition to the information required in 40 CFR 63.9(h)(2) (see Condition 4.25), the notification shall include the following certification(s) of compliance, as applicable, and be signed by a responsible official:

5.9.2.1 “This facility complies with the required initial tune-up according to the procedures in 40 CFR 63.7540(a)(10)(i) through (vi) (see Condition 5.4).”

5.9.2.2 “This facility has had an energy assessment performed according to 63.7530(e) (see Condition 5.5).”

[40 CFR 63.7530(d) and (e) and 63.7545(e)(8)]

5.10. NESHAP Subpart DDDDD Annual Compliance Reports. The permittee shall submit annual compliance reports. [40 CFR 63.7550(a)]

5.10.1. The first compliance report shall cover the period beginning on January 31, 2016, and ending on January 31, 2017, and be postmarked and submitted no later than January 31, 2017. [40 CFR 63.7550(b)(1) and (2)]

5.10.2. Each subsequent compliance report shall cover the annual reporting period from January 1 to December 31 and be postmarked or submitted no later than January 31. [40 CFR 63.7550(b)(3) and (4)]

5.10.3. The compliance report shall include the following information: [40 CFR 63.7550(c)(1)]

5.10.3.1 Company and Facility name and address. [40 CFR 63.7550(c)(5)(i)]

5.10.3.2 Process unit information. [40 CFR 63.7550(c)(5)(ii)]

5.10.3.3 Date of report and beginning and ending dates of the reporting period. [40 CFR 63.7550(c)(5)(iii)]

5.10.3.4 The total operating time during the reporting period. [40 CFR 63.7550(c)(5)(iv)]

5.10.3.5 The date of the most recent tune-up for each unit subject to the requirement to conduct a tune-up according to 40 CFR 63.7540(a)(10) (see Condition 5.8.2), and the date of the most recent burner inspection. [40 CFR 63.7550(c)(5)(xiv)]

5.10.3.6 If there are no deviations from the requirements for work practice standards in Table 3 to Subpart DDDDD that apply to you, a statement that there were no deviations from the work practice standards during the reporting period. [Item 1.b in Table 9 to Subpart DDDDD]

5.10.3.7 If you have a deviation from a work practice standard during the reporting period, the report must contain a description of the deviation and information on the duration and cause of the deviation and corrective action taken. [Item 1.c in Table 9 to Subpart DDDDD and 40 CFR 63.7550(d)(1) and (2)]

5.10.3.8 A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [40 CFR 63.7550(c)(5)(xvii)]

5.10.4. All reports shall be submitted electronically using the Compliance and Emissions Data Reporting Interface that is accessed through the EPA’s Central Data Exchange (www.epa.gov/cdx). If the reporting form specific to this subpart is not available in

CEDRI at the time that the report is due, the report shall be submitted to the address listed in Condition 3.40. [40 CFR 63.7550(h)]

- 5.11. NESHAP Subpart DDDDD Notification of Fuel Switch or Physical Change. The permittee shall provide notice to the EPA within 30 days of the switch/change if the permittee has switched fuels or made a physical change to a boiler and the fuel switch or physical change resulted in the applicability of a different subcategory of NESHAP Subpart DDDDD. The notice shall identify:
- 5.11.1. The name of the owner or operator of the boiler, the location of the boiler, identification of the boiler that has switched fuels or was physically changed, and the date of the notice.
 - 5.11.2. The currently applicable subcategory under NESHAP Subpart DDDDD.
 - 5.11.3. The date upon which the fuel switch or physical change occurred.

[40 CFR 63.7545(h)]

6. Unit-Specific Requirements – Lumber Kilns #5-11

Lumber Kilns #5-11 Emission Limits and Work Practice Requirements

- 6.1. Particulate matter emissions from the stack(s) of these emission units shall not exceed an average of 0.23 grams per dry standard cubic meter (0.1 grains per dry standard cubic foot) during any three-hour period.
- 6.1.1. Compliance with the particulate matter limit is determined using EPA Reference Method 5 (see 40 CFR Part 60, appendix A).

[40 CFR 49.125(d)(3) and (e)]

7. Unit-Specific Requirements – Cyclones

Cyclones Emission Limits and Work Practice Requirements

- 7.1. Particulate matter emissions from the stack(s) of these emission units shall not exceed an average of 0.23 grams per dry standard cubic meter (0.1 grains per dry standard cubic foot) during any three-hour period.
- 7.1.1. Compliance with the particulate matter limit is determined using EPA Reference Method 5 (see 40 CFR Part 60, appendix A).

[40 CFR 49.125(d)(3) and (e)]

8. Unit-Specific Requirements – Bins

Bins Emission Limits and Work Practice Requirements

- 8.1. Particulate matter emissions from the stack(s) of these emission units shall not exceed an average of 0.23 grams per dry standard cubic meter (0.1 grains per dry standard cubic foot) during any three-hour period.
- 8.1.1. Compliance with the particulate matter limit is determined using EPA Reference Method 5 (see 40 CFR Part 60, appendix A).

[40 CFR 49.125(d)(3) and (e)]

9. Unit-Specific Requirements – MNFA (Miscellaneous Non-Fugitive Activities)

MNFA Emission Limits and Work Practice Requirements

- 9.1. Particulate matter emissions from the stack(s) of these emission units shall not exceed an average of 0.23 grams per dry standard cubic meter (0.1 grains per dry standard cubic foot) during any three-hour period.
 - 9.1.1. Compliance with the particulate matter limit is determined using EPA Reference Method 5 (see 40 CFR Part 60, appendix A).

[40 CFR 49.125(d)(3) and (e)]

Attachment 3

Facility Diagram

Figure 1.2 Small Log Mill Emission Source Locations.

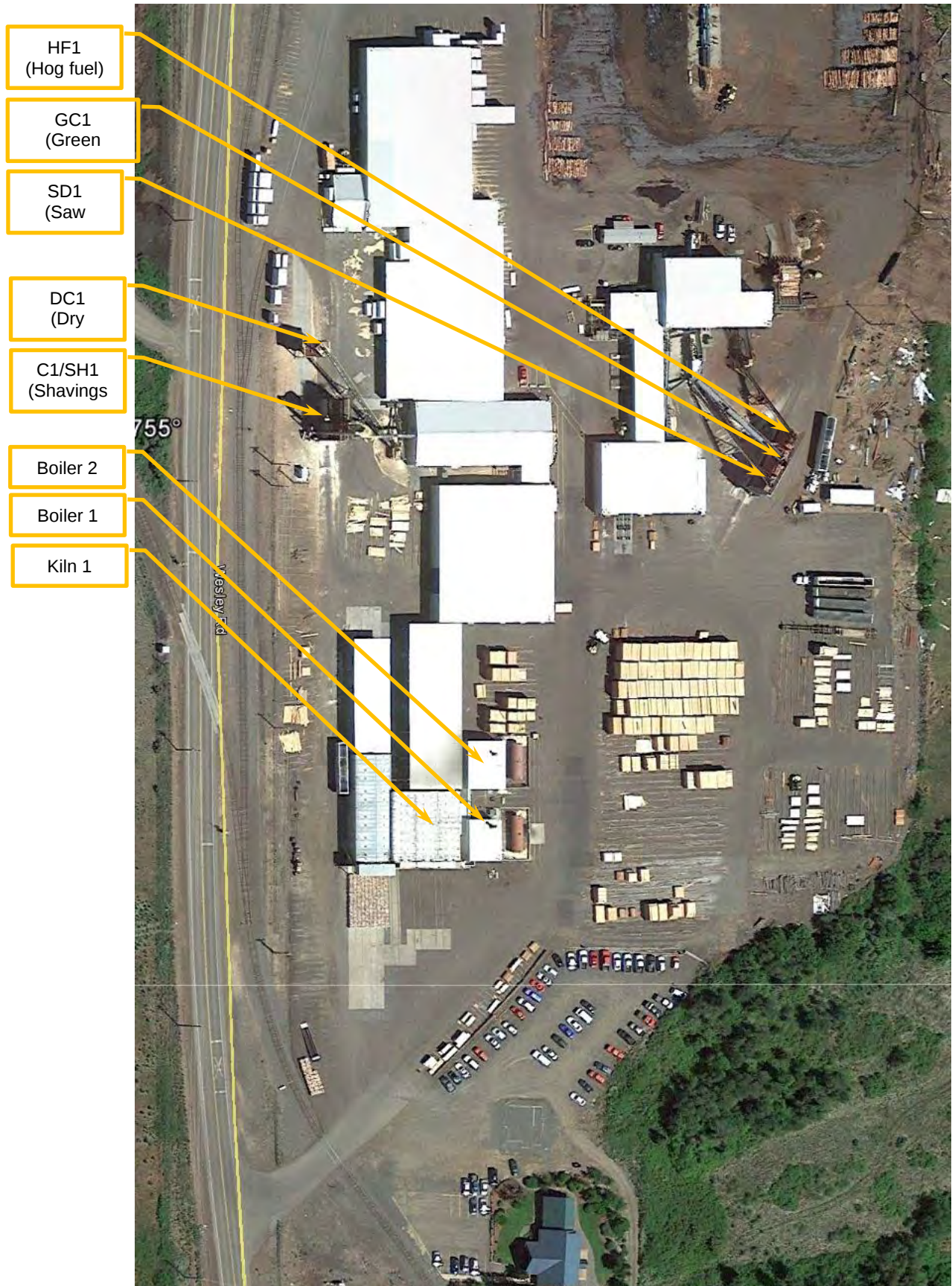
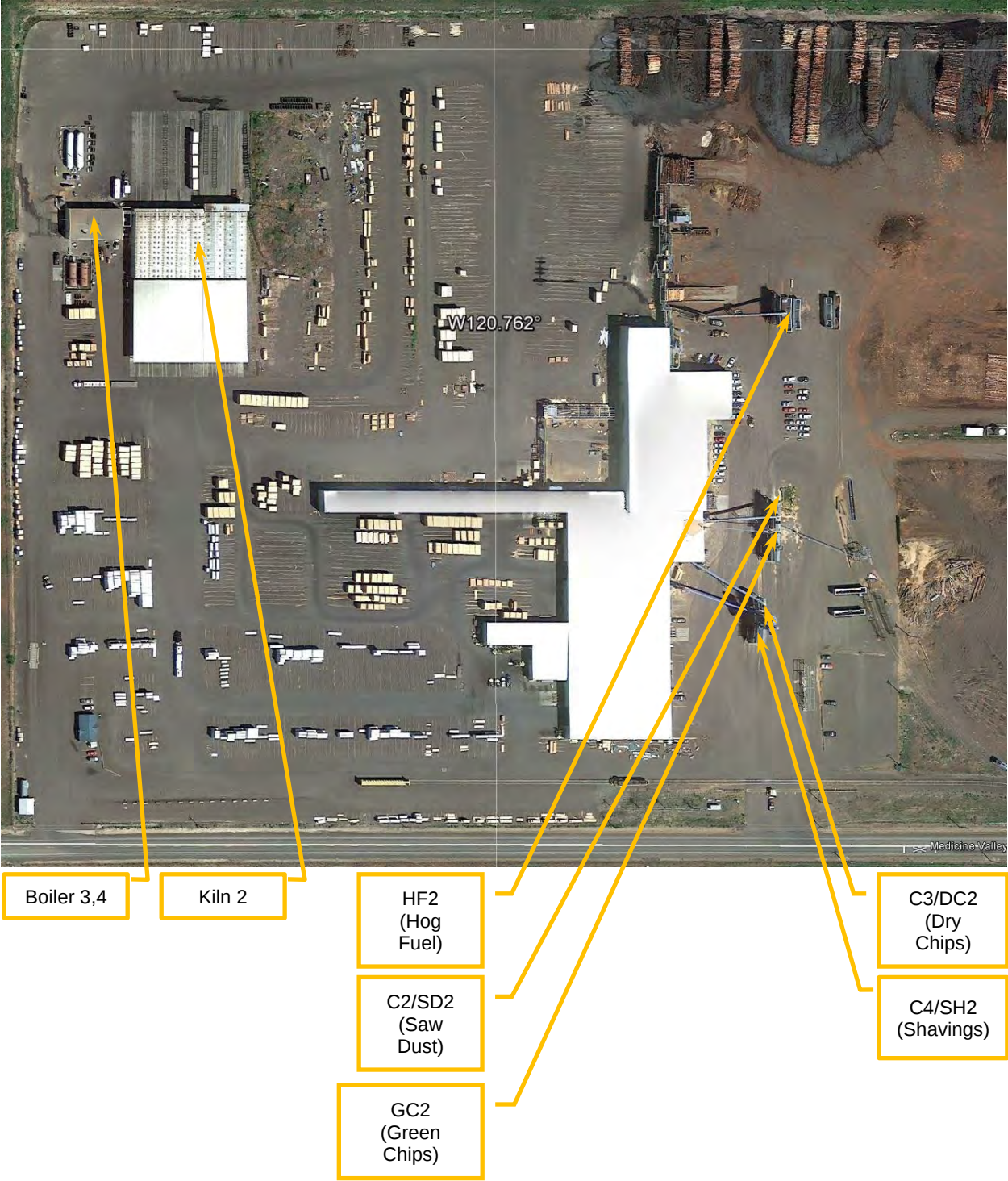


Figure 1.3 Large Log Mill Emission Source Locations.



Attachment 4

Photograph Log

All photographs taken by Jon Klemesrud on June 21, 2023

Nikon Coolpix AW100

Photograph Log – Yakama Forest Products



Photo #:01 (DSCN3290)

Description: Facing northeast at the “small log mill,” photo of the inoperable dry kilns. The dry kilns have not been operated in 15 years, in the spring of 2023 the kilns were gutted and the building structure is being used on occasion as large trailer mechanical shop.



Photo #:02 (DSCN3291)

Description: Facing northwest at the “small log mill,” photo of the building/structure that previously housed Boiler #2. Boiler #2 was removed and hauled to the adjacent “large log mill” in the spring of 2023. Boiler #2 is currently not operable and in need of repair and retrofit including burners to be modified for propane. Building/structure will be modified to be a smaller vehicle mechanical shop.



Photo #:03 (DSCN3292)

Description: Facing southwest from the “small log mill,” photo of the Boiler #1 building structure and location of the removed oil tanks. Boiler #1 was removed off-site in 2022.



Photo #:04 (DSCN3293)

Description: Facing north from the “small log mill,” photo of the hog fuel bin, green chip bin and sawdust bin. Material is received from the conveyors and loaded into trucks.

Photograph Log – Yakama Forest Products



Photo #:05 (DSCN3294)
Description: Facing north from the “small log mill,” photo of the dry chip and dry shaving bins and associated conveyors.



Photo #:06 (DSCN3295)
Description: Facing northwest from the “large log mill,” photo of the hog fuel bin and conveyor located in the northeast portion of the mill.



Photo #:07 (DSCN3296)
Description: Facing west from the “large log mill” photo of the dry chip and shavings bins and conveyors.



Photo #:08 (DSCN3297)
Description: Facing north from the “large log mill,” photo of the saw dust and green chip bin and conveyors.

Photograph Log – Yakama Forest Products



Photo #:09 (DSCN3298)

Description: Facing south from “large log mill,” photo of Boiler #2 that was moved from the “small log mill” in the spring of 2023. Boiler #2 not operating and won’t likely operate for a few years according to the Facility.



Photo #:10 (DSCN3299)

Description: Facing southwest from the “large log mill,” photo of Boiler #4. Boiler #4 was not operating at the time of inspection due to processing being down. Boiler #4 last operated the week prior.



Photo #:11 (DSCN3300)

Description: Facing southwest from the “large log mill,” photo of Boiler #3, currently operating at the time of inspection.



Photo #:12 (DSCN3301)

Description: Photo of Boiler #3 display and operating parameters.

Photograph Log – Yakama Forest Products



Photo #:13 (DSCN3303)
Description: Facing northwest from the “large log yard,” photo of the propane tanks that fuel the Boiler #3 and Boiler #4. Propane is delivered daily (approx), by White Swan Farm Supply.



Photo #:14 (DSCN3304)
Description: Facing west, photo of the boiler blowdown evaporation tank. Producing steam from evaporating the process water from the deaeration tank.



Photo #:15 (DSCN3305)
Description: Facing south from the “large log mill,” photo of the kilns (#2-6). Kilns #2, 3, 4, 5 were operating at the time inspection, Kiln #1 was offline to repair the track, Kiln #7 was offline due to maintenance on the steam coil piping.



Photo #:16 (DSCN3306)
Description: Facing south, photo from the roof of the kilns, viewing kiln #6.

Photograph Log – Yakama Forest Products



Photo #:17 Facing southeast from the “large log mill,” photo looking toward the mill and lumber storage area.



Photo #:18 (DSCN3308)
Description: Photo of the Boiler #3 O2 sensor.



Photo #:19 (DSCN3309)
Description: Facing north, photo of the two stacks from Boiler #3 (left) and Boiler #4 (right).



Photo #:20 (DSCN3310)
Description: Photo of the Boiler #4 display panel. Showing alarm code for the 02 sensor that has been out and being replaced by Yakima Mechanical.

Photograph Log – Yakama Forest Products



Photo #:21 (DSCN3311)
Description: Photo of the Boiler #3 placard.



Photo #:22 (DSCN3312)
Description: Photo of the Boiler #3 placard.

Attachment 5

2022 Fee Calculation Worksheet



OMB No. 2060-0336, Expires 11/30/2022

Federal Operating Permit Program (40 CFR Part 71)
FEE CALCULATION WORKSHEET (FEE)

Use this form initially, or thereafter on an annual basis, to calculate part 71 fees.

A. General Information

Type of fee (Check one): ☐ Initial ☒ Annual

Deadline for submitting fee calculation worksheet 4 / 1 / 2023

For initial fees, emissions are based on (Check one):

☒ Actual emissions for the preceding calendar year. (Required in most circumstances.)

☐ Estimates of actual emissions for the current calendar year. (Required when operations commenced during the preceding calendar year.)

Date commenced operations / /

☐ Estimates of actual emissions for the preceding calendar year. (Optional after a part 71 permit was issued to replace a part 70 permit, but only if initial fee payment is due between January 1 and March 31; otherwise use actual emissions for the preceding calendar year.)

For annual fee payment, you are required to use actual emissions for the preceding calendar year.

B. Source Information: Complete this section only if you are paying fees but not applying for a permit.

Source or facility name Yakama Forest Products

Mailing address: Street or P.O. Box PO Box 489

City White Swan State WA ZIP 98952 -

Contact person Mr. Steve Rigdon Title General Manager

Telephone (509) 874 - 2901 Ext 101 Part 71 permit no. R10T5120100

C. Certification of Truth, Accuracy and Completeness: Only needed if not submitting a separate form CTAC.

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in this submittal (form and attachments) are true, accurate and complete.

Name (signed) 

Name (typed) Mr. Steve Rigdon Date: 02 / 28 / 2023

FEE

2

D. Annual Emissions Report for Fee Calculation Purposes -- Non-HAP

You may use this to report actual emissions (tons per year) of regulated pollutants (for fee calculation) on a calendar-year basis for both initial and annual fee calculation purposes. Section E is designed to report HAP emissions. Quantify all actual emissions, including fugitives, but do not include insignificant emissions and certain regulated air pollutants that are not counted for fee purposes, such as CO and GHGs (see instructions). Sum the emissions in each column to calculate subtotals. Subtotals should be reported to the nearest tenth (0.1) of a ton at the bottom of the page. If any subtotal exceeds 4,000 tons, enter 4,000 for that column.

This data is for 2022 (year)

Emission Unit	Unit ID	NOx	VOC	SO2	PM10	Lead	Total
Boiler	Boiler 1						
Boiler	Boiler 2						
Boiler	Boiler 3	7.7	0.6	0.4	0.4	0.0	9.1
Boiler	Boiler 4	7.7	0.6	0.4	0.4	0.0	9.1
Drying Kiln	Kiln 1-4						
Drying Kiln	Kiln 5-11		49.8		1.4		51.2
Cyclone	C 1		0.5		0.6		1.2
Cyclone	C 2		2.3		2.4		4.7
Cyclone	C 3		4.4		5.2		9.7
Cyclone	C 4		1.7		1.7		3.5
Hog Fuel H&S	HF 1				0.0		0.0
Hog Fuel H&S	HF 2				0.0		0.0
Sawdust H&S	SD 1				0.0		0.0
Sawdust H&S	SD 2				0.0		0.0
Green Chip H&S	GC 1				0.0		0.0
Green Chip H&S	GC 2				0.0		0.0
Dry Chip H&S	DC 1				0.0		0.0
Dry Chip H&S	DC 2				0.0		0.0
Shavings H&S	SH 1				0.0		0.0
Shavings H&S	SH 2				0.0		0.0
MFA					3.0		3.0
MNFA					1.5		1.5
Unpaved Roads	FD 1				13.7		13.7
Paved Roads	FD 2				11.6		11.6
Subtotals		15.5	60.1	0.8	42.0	0.0	118.4
SUBTOTALS:							

FEE

3

E. Annual Emissions Report for Fee Calculation Purposes – HAP

HAP Identification. Identify individual HAP emitted at the facility, identify the CAS number, and assign a unique identifier for use in the second table in this section. Whenever assigning identifier codes, use "HAP1" for the first, "HAP2" for the second, and so on.

Name of HAP	CAS No	Identifier

HAP Emissions. Report the actual emissions of individual HAP identified above. Use the identifiers assigned in the table above. Include all emissions, including fugitives, and do not include insignificant emissions. Sum the emissions in each column to calculate subtotals. Report subtotals to the nearest tenth (0.1) of a ton at the bottom of the page. If any subtotal exceeds 4,000 tons, enter 4,000.

This data is for 2022 (year)

Name of HAP	CAS No.	Identifier	HAP Emission by Unit (t/y)				Subtotals	VOC Subtotal
			Kilns 1-4	Kilns 5-11	Mill			
Methanol	67561	HAP 1	Out of Service	1.68	0.38		2.052	2.0519
Formaldehyde	50000	HAP 2		0.06			0.062	0.0624
Acetaldehyde	75070	HAP 3		0.99			0.987	0.9873
Propionaldehyde	123386	HAP 4		0.02			0.020	0.0203
Acrolein	107028	HAP 5		0.05			0.050	0.0497
Total				2.7960	0.3755		3.172	3.172
SUBTOTALS:								

F. Fee Calculation Worksheet

This worksheet is used to calculate the total fee owed (including the emissions-based fee and the GHG fee adjustment) for both initial and annual fee payment purposes. Reconciliation is only for cases where you are paying the annual fee and you used any type of estimate of actual emissions when you calculated the initial fee. If you do not need to reconcile fees, complete line 1-5 (emissions summary) and then skip down to line 21 (emission calculation). See instructions for more detailed explanation.

EMISSIONS SUMMARY

1. Sum the subtotals from section D of this form (non-HAP) and enter the total, rounded to the nearest tenth (0.1) of a ton.	118.35
2. Sum the subtotals from section E of this form (HAP) and enter the total, rounded to the nearest tenth (0.1) of a ton.	3.17
3. Sum lines 1 and 2.	121.53
4. Enter the emissions that were counted twice. If none, enter "0."	3.17
5. Subtract line 4 from line 3, round to the nearest ton, and enter the result here. This is the total emissions that count for fees purposes.	118
RECONCILIATION (WHEN INITIAL FEES WERE BASED ON ESTIMATES FOR THE "CURRENT" CALENDAR YEAR) Only complete lines 6-10 if you are paying the first annual fee and initial fees were based on estimated actual emissions for the calendar year in which you paid initial fees; otherwise skip to line 11 or to line 21.	
6. Enter the total estimated actual emissions for the year the initial fee was paid (previously reported on line 5 of the initial fee form).	
7. If line 5 is greater than line 6, subtract line 6 from line 5, and enter the result. Otherwise enter "0."	
8. If line 6 is greater than line 5, subtract line 5 from line 6, and enter the result. Otherwise enter "0."	
9. If line 7 is greater than 0, multiply line 7 by last year's fee rate (\$/ton) and enter the result here. This is the underpayment. Go to line 21.	
10. If line 8 is greater than 0, multiply line 8 by last year's fee rate (\$/ton) and enter the result here. This is the overpayment. Go to line 21.	

FEE

5

**RECONCILIATION
(WHEN INITIAL FEES WERE BASED ON ESTIMATES
FOR THE "PRECEDING" CALENDAR YEAR)**

Only complete lines 11-20 if you are paying the first annual fee and initial fees were based on estimated actual emissions for the calendar year preceding initial fee payment; otherwise skip to line 21. If completing this section, you will also need to complete sections D and E to report actual emissions for the calendar year preceding initial fee payment.

11. Sum the actual emissions from section D (non-HAP) for the calendar year preceding initial fee payment and enter the result here.	
12. Sum the actual emissions from section E (HAP) for the calendar year preceding initial fee payment and enter the result here.	
13. Add lines 11 and 12 and enter the total here. These are total actual emissions for the calendar year preceding initial fee payment.	
14. Enter double counted emission from line 13 here. If none, enter "0."	
15. Subtract line 14 from line 13, round to the nearest ton, and enter the result here.	
16. Enter the total estimated actual emissions previously reported on line 5 of the initial fee form. These are estimated actual emissions for the calendar year preceding initial fee payment.	
17. If line 15 is greater than line 16, subtract line 16 from line 15, and enter the result here. Otherwise enter "0."	
18. If line 16 is greater than line 15, subtract line 15 from line 16, and enter the result here. Otherwise enter "0."	
19. If line 17 is greater than 0, multiply line 17 by last year's fee rate (\$/ton) and enter the result here. This is the underpayment.	
20. If line 18 is greater than 0, multiply line 18 by last year's fee rate (\$/ton) and enter the result on this line. This is the overpayment.	
EMISSION FEE CALCULATION	
21. Multiply line 5 (tons) by the current fee rate (\$/ton) and enter the result here. This is the unadjusted emissions fee. Continue on to line 23.	\$6,635.14
GHG FEE ADJUSTMENT	
22. If you are submitting an initial permit application and this is the first time you are paying fees, enter \$2,236, otherwise enter "0". [Note that any updates to the initial application are covered under this one-time charge.]	
23. Enter the number of permit modifications (or related permit actions) you have submitted to the permitting authority since you last paid fees. If none, skip to line 25.	
24. Multiply the number in line 23 by \$365 and enter the result.	

FEE

6

25. If you have submitted a permit renewal application since the last time you paid fees enter \$520, otherwise enter "0"	
26. Sum line 22, 24, and 25 and enter the result. This is the GHG fee adjustment	
OTHER ADJUSTMENTS	
27. Add the total on line 21 and the total on line 26 and enter the result.	
28. Enter any underpayment from line 9 or 19 here. Otherwise enter "0."	
29. Enter any overpayment from line 10 or 20 here. Otherwise enter "0."	
30. If line 28 is greater than "0," add it to line 27 and enter the result here. If line 29 is greater than "0," subtract this from line 27 and enter the result here. Otherwise enter the amount on line 27 here. This is the fee adjusted for over/underpayment.	
31. Enter any credit for fee assessment error here. Otherwise, enter "0."	
32. Subtract line 31 from line 30 and enter the result here. Stop here. This is the TOTAL FEE (AFTER ADJUSTMENTS) that you must remit to EPA.	\$6,635.14

INSTRUCTIONS FOR FEE FEE CALCULATION WORKSHEET

Information Collection Burden Estimates

The public reporting and recordkeeping burden for this collection of information is estimated to average 247 hours per respondent per year. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

DETAILED INSTRUCTIONS

Use this form to initially or annually calculate fees. This form is for paying fees to EPA or a delegate agency (such as a State or tribe) under a part 71 operating permit program. The requirements for paying fees under part 71 programs, as well as the forms and instructions contained herein, are based on the requirements of 40 CFR 71.9

There may be cases, under a part 71 program, when you are not required to complete this form or pay the EPA fee rate (where the part 71 program has been delegated and EPA's fee has been suspended because EPA incurs no administrative costs). In such cases, the delegate agency will instruct you on how to calculate fees and how to pay them. If in doubt, contact your permitting authority.

General Rules for Fee Calculation under Part 71:

- Use the fee rate in effect at the time you pay the fee regardless of the time period that the emissions data represents. For example, if the annual fee for the current year is due July 1, you would use the fee rate in effect for the current year and the actual emissions for the previous calendar year.
- Do not prorate initial or annual fees. Pay full fees for the entire calendar year regardless of how many days you operated or were subject to the program during the previous or current year.
- Do not hesitate to contact the permitting authority if you have any doubt about how to calculate fees, especially if you have an unusual set of circumstances not addressed specifically by these forms or whenever the permit requirements appear to conflict with these forms (however, always assume the permit requirements take precedence in such cases).

Section A. General Information

The deadline for submitting the fee form and paying the fee for initial fee payment purposes for most sources is the same deadline as for submitting all other forms required for the initial permit application. Other deadlines apply for initial fee payment in certain limited circumstances:

- When a source is subject to part 71 because of an unresolved EPA objection to a part 70 permit, fees are not due with the part 71 application, but are due 3 months following the date of the issuance of the part 71 permit.
- When EPA withdraws approval of a part 70 program and implements a part 71 programs, fees are submitted according to a schedule based on the source's SIC code (within 6 to 9 months of the effective date of the part 71 program).

The deadline for submitting the fee form and paying the fee for annual fee payment purposes is the anniversary date of initial fee payment. This is required whether or not a permit has been issued. If you were required to pay initial fees between January 1 and March 31, the regulations allow for submittal of annual fees no later than April 1.

Whether you are paying initial or annual fees see the instructions for sections D and E for more information on which calendar-year emission data to use (preceding or current year) and how to quantify such emissions (actual emissions or estimates of actual emissions).

Section B. Source Information

Complete this section only if you are preparing this form for submittal at a different time than for the other portions of an initial application or for annual fee purposes.

Section C. Certification of Truth, Accuracy and Completeness

This form and any other document required by a permit must be signed by a responsible official certifying truth, accuracy and completeness of the information. If you are submitting a separate **CTAC** form, there is no need to complete this section of the form. If you complete this section, there is no need to submit form **CTAC** separately.

Section D. Annual Emissions Report for Fee Calculation Purposes – Non-HAP

Calculate actual emissions of regulated pollutants (for fee calculation), except for HAP, on a calendar-year basis for the facility in this section. Section E is provided to report actual emissions of HAP. Note the phrase “regulated pollutant (for fee calculation)” is any “regulated air pollutant” except carbon monoxide (CO), and pollutants regulated solely because they are: 1) subject to regulation under section 112(r) of the Act, or 2) a class I or II substance under title VI of the Act. **Note that GHG emissions are not counted for fee purposes.**

If more than one year of data is being submitted with the fee calculation worksheet, copy this page and complete a separate table for each year. If you are submitting an initial application, you may use emissions data already reported on form **EMISS**, provided this is the same data you would otherwise report in sections D and E of this form. If using **EMISS** in this manner, please note this on the fee calculation form. Also, sources must submit attachments to this form to show (at a minimum) examples of the calculations used to determine these values.

Show actual emissions for each listed air pollutant for each emission unit. Values should be reported to the nearest tenth (0.1) of a ton.

The column for "other" is for other regulated pollutants (for fee calculation) not already listed on the form. Write in the name of the pollutant in the proximity of the "other" column. If more than one such pollutant, show the pollutants, and the totals on an attachment.

Actual emissions must be calculated using actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted over the preceding calendar year. Sources that have been issued title V permits are required to compute actual emissions using compliance methods required by the permits, such as monitoring or source testing data. If this is not possible, actual emissions should be determined using other federally recognized procedures.

For initial fee calculation purposes, most sources are required to use actual emissions for the preceding calendar year. However, there are certain exceptions where estimates of actual emissions are either required or allowed in place of actual emissions for the preceding calendar year (see table below):

Exception	Emission Data
When the source commenced operation during the preceding calendar year.	Estimates of actual emissions for the "current" calendar year are required
When EPA withdraws approval of a part 70 program and implements a part 71 program, and the source pays initial part 71 fees between January 1 and March	Either estimates of actual emissions for the "preceding" calendar year or actual emissions for the preceding calendar year may be used.
When a part 71 permit was issued following an unresolved objection to a part 70 permit, and the source is required to pay initial part 71 fees between January 1 and March 31.	Either estimates of actual emissions for the "preceding" calendar year or actual emissions for the preceding calendar year may be used.

For annual fee purposes, fee calculation should be based on actual emissions for the preceding calendar year in all cases.

In most cases you will only need to report one set of emission data using sections D and E of this form (the data that is the basis of the initial or annual fee being paid as explained above). This data is subsequently carried over to lines 1 and 2 of section F (Fee Calculation Worksheet) of the form.

However, there is one exception where you would be required to report two different sets of emissions data using sections D and E – when paying the first annual fee and reconciliation is required because the initial fee was based on estimated actual emissions for the "preceding" calendar year (the year preceding initial fee payment). In this case, the two data sets would be:

- actual emissions for the year initial fees paid (for annual fee purposes in lines 1-5 of section F of the form), and
- actual emissions for the year preceding initial fee payment (for reconciliation in lines 11-20 of the form)

Whenever reconciliation is required as part of annual fee payment, you will also need a copy of the fee forms you previously submitted with initial fee payment in order to obtain the value of estimated actual emissions.

Include all fugitive emissions in the calculation of actual emissions, including those that do not count for applicability. Do not include any insignificant emissions identified on form **IE**.

The subtotal line in section D of the form is provided at the bottom of each column to enter total emissions for each pollutant reported above. Each subtotal should be reported to the nearest tenth (0.1) of a ton. If any subtotal exceeds 4,000 tons, enter 4,000 tons for that column.

Any necessary adjustments for double counting of emissions will be performed later in section F.

Section E. Annual Emissions Report for Fee Calculation Purposes -- HAP

List the actual emissions of individual HAP from each emission unit. If you are initially applying for a permit, you may use the emissions of HAP reported on form **EMISS**, instead of completing this section of this form, provided these emissions are the same as you would otherwise report using this section of the form. If you are doing this, please note it on the form.

This section is composed of two tables. The first table is to identify individual HAP emitted at each emission unit. Assign a unique identifier for use in the second table. Please use "HAP1" for the first

one, "HAP2" for the second one, and so on. The second table is to calculate the actual emission of individual HAP at each emission unit. Use the identifiers assigned in the first table to label the column headers for the second table. You may round and report these emissions to the nearest tenth (0.1) of a ton. Sum the values in each column and enter the subtotals at the bottom of the table. If any subtotal exceeds 4,000 tons, enter 4,000 for that column.

See instructions for section D for more information on reporting emissions data.

Section F. Fee Calculation Worksheet

This worksheet is used to sum the total tons of actual emissions subject to fees, adjust for double counting of emissions, perform certain reconciliations for underpayment and overpayment of fees and adjust for fee assessment errors, if needed, and ultimately to determine the total fee to be paid.

A detailed explanation of Section F follows (separated into six parts):

Emissions Summary

The subtotals for each pollutant listed in Sections D and E (or from form **EMISS**) are added together to calculate the total emissions (in tons per year) for the facility.

The emissions that are reported here will vary for initial fee payment purposes, depending on the specific circumstances, but will always be actual emissions for the preceding calendar year for annual fee purposes. See the instructions for section D for more on the emissions data you should use in the part of the form.

The total emissions are adjusted for double counting and are rounded to the nearest ton. For example, double counting may occur where a pollutant is defined as HAP and VOC. If you adjust for double counting, attach an explanation for this.

Reconciliation (When Initial Emission Fees Were Based on Estimates for the Current Calendar Year)

This section is only used by sources paying their first annual fee when their initial fee was based on estimates of calendar-year emissions for the "current" year (the same year that initial fees were paid). This reconciliation is done by comparing the actual emissions for the "current" year provided in sections D and E of this submittal with the estimate of those emissions previously provided with initial fee payment. There may have been overpayment or underpayment of the initial fee. The fee you are paying now will be adjusted for this difference later.

Reconciliation (When Initial Emission Fees Were Based on Estimates for the Preceding Calendar Year)

This section is only used by sources paying their first annual fee when their initial fee was based on estimates of calendar-year emissions for the year preceding initial fee payment, provided the source was required to pay its initial fee between January 1 and March 31, and EPA issued the Part 71 permit to replace a Part 70 permit. This reconciliation is done by comparing the actual emissions for the "preceding" year provided in sections D and E of this submittal with the estimate of those emissions provided with initial fee payment. There may have been overpayment or underpayment of the initial fee. The fee you are paying now will be adjusted for this difference later.

Emission Fee Calculation

Calculate the emission-based fee using the emissions from line 5 (tons) multiplied by the fee rate (\$/ton) in effect at the time the fee is paid.

GHG Fee Adjustment

The part 71 rule was amended in 2015 to require the fees to be increased by a GHG fee adjustment. The GHG adjustment must be calculated by each source that is required to pay fees. The adjustment is based on the burden for the permitting authority to conduct certain GHG evaluations or reviews related to the source, rather than on emissions. Set fees are charged for certain activities that have occurred at the source since the last time fees were paid. For an initial application, the set fee is a one-time charge that includes the costs of processing application updates. The term "permit modification" refers to any significant and minor modifications, but not to administrative amendments. The number of permit modifications must be multiplied by the set fee for modifications to determine the total GHG adjustment for modifications. The set fee for a permit renewal also includes any permit modifications that may be processed at the same time as the renewal. Note that you may need to check with the permitting authority to determine if they are holding any permit modification requests you have submitted for processing with an upcoming permit renewal.

Other Adjustments

The purpose of this section is to adjust the emissions-based to determine the total fee (after adjustments) that is due to the EPA. The emissions fee determined on line 21 is adjusted by the GHG fee adjustment, any amounts of overpayment or underpayment related to a previous fee submittal, and to correct for any fee assessment errors.

Fee assessment errors occur when the permitting authority determines that the source has calculated the fee incorrectly. If this occurs, you will be notified of the error. Any overpayment will be credited against the next fee owed. In the case of underpayment, you will be billed for the corrected fee and you will have 30 days to remit the amount. If you think the assessed fee is in error, you may submit a written explanation of the alleged error, but you must pay the fee. The permitting authority will provide a determination in 90 days. If the assessment of underpayment is in error, your account will be credited.

Fee Payment

See form FF (the Fee Filing form) for instructions on how to make fee payment to the EPA.

Penalties and Interest

The permitting authority will bill sources for appropriate penalties and interest for late payment or excessive underpayment of fees. Interest will be assessed on payments received later than the due date. Penalties shall be assessed if payment is not paid within 30 days of the due date. For sources issued with issued permits, penalties and interest shall be assessed for excessive underpayment of the annual fee amount.

END

Table 1
Yakama Forest Products
Annual Emission Estimate
Input Data

Unit Fee per ton

Calender year

Operating Condition	Units	Actual Annual Value	SLM	LLM	SLM (bf)	LLM (bf)
Species Cut						
Grand Fir	mbf/yr	6,950	3,563	3,387	3,562,841	3,387,217
Douglas Fir	mbf/yr	16,182	6,044	10,138	6,043,755	10,138,386
Pine	mbf/yr	33,747	5,869	27,878	5,868,751	27,877,884
Total	mbf/yr	56,879	15,475	41,403	15,475,347	41,403,487

By Products

Shavings	bdt/yr	11,145
Hog Fuel	bdt/yr	7,709
Green (Kraft) Chips	bdt/yr	33,717
Dry Chips	bdt/yr	0
Sawdust	bdt/yr	15,460

Small Log Mill

Boiler Operating Hours	hrs/yr/boiler	Out of Service
Boiler Fuel	gal/yr	Out of Service

Large Log Mill

Boiler Operating Hours (#3)	hrs/yr/boiler	5,958
Boiler Operating Hours (#4)	hrs/yr/boiler	6,802
Boiler Fuel (LPG)	gal/yr	2,382,957

Table 2
Yakama Forest Products
Annual Emission Estimate
Section D Form

Calendar year		2022					
Emission Unit	Unit ID	NOx	VOC	SO2	PM10	Lead	Total
Boiler	Boiler 1			Out of Service			
Boiler	Boiler 2			Out of Service			
Boiler	Boiler 3	7.7	0.6	0.4	0.4	0.0	9.1
Boiler	Boiler 4	7.7	0.6	0.4	0.4	0.0	9.1
Drying Kiln	Kiln 1-4			Out of Service			
Drying Kiln	Kiln 5-11		49.8		1.4		51.2
Cyclone	C 1		0.5		0.6		1.2
Cyclone	C 2		2.3		2.4		4.7
Cyclone	C 3		4.4		5.2		9.7
Cyclone	C 4		1.7		1.7		3.5
Hog Fuel H&S	HF 1				0.0		0.0
Hog Fuel H&S	HF 2				0.0		0.0
Sawdust H&S	SD 1				0.0		0.0
Sawdust H&S	SD 2				0.0		0.0
Green Chip H&S	GC 1				0.0		0.0
Green Chip H&S	GC 2				0.0		0.0
Dry Chip H&S	DC 1				0.0		0.0
Dry Chip H&S	DC 2				0.0		0.0
Shavings H&S	SH 1				0.0		0.0
Shavings H&S	SH 2				0.0		0.0
MFA					3.0		3.0
MNFA					1.5		1.5
Unpaved Roads	FD 1				13.7		13.7
Paved Roads	FD 2				11.6		11.6
Subtotals		15.5	60.1	0.8	42.0	0.0	118.4

Table 3
Yakama Forest Products
Annual Emission Estimate
Section E Form

Calendar year		2022		HAP Emission by Unit (t/y)				VOC Subtotal
Name of HAP	CAS No.	Identifier	Kilns 1-4	Kilns 5-11	Mill	Subtotals		
Methanol	67561	HAP 1	1.68	0.38		2.052	2.0519	
Formaldehyde	50000	HAP 2	0.06			0.062	0.0624	
Acetaldehyde	75070	HAP 3	0.99			0.987	0.9873	
Propionaldehyde	123386	HAP 4	0.02			0.020	0.0203	
Acrolein	107028	HAP 5	0.05			0.050	0.0497	
Total			2.7960	0.3755		3.172	3.172	

Table 4
Yakama Forest Products
Annual Emission Estimate
Section F Form

Total Criteria Pollutants		118.35
Total HAPS		3.17
	Subtotal	121.53
VOC HAPS		3.17
Total Emissions		118.35
	(Rounded)	118
Unit Cost		\$56.23
Total Fee		\$6,635.14

Table 5
Yakama Forest Products
Emissions Summary

Emissions Source	Pollutants (tpy)								Data Source
	SOx	NOx	CO	VOC	TP	PM10	PM25	HAP	
Actual Emissions									
Boiler	0.8	15.5	8.9	1.2	0.8	0.8	0.8	0.0	All emission factors from Title V Permit 2.8 unless otherwise noted on detail 0.38 worksheets.
Kiln				49.8	1.4	1.4		2.8	
Mill				9.0	11.8	10.0	5.9		
Misc. Non-fugitive Activities					2.9	3.0	1.52		
Misc. Fugitive Activities					3.0	1.5	0.75		
Fugitive Dust					25.3	25.3			
Total	0.77	15.5	8.9	60.1	45.2	42.0	9.0	3.2	
Total Point Source	0.77	15.5	8.9	60.1	16.9	15.3	8.2	3.2	

Notes:

1. Boldface values are point sources.

Table 6
Yakama Forest Products
Boiler Emissions Calculations - Actual

LPG
ASTM D 1835 Special Duty (HD-5)

Boiler Input Data**Data for Actual Emissions Calculation**

Paramter	Units	SLM Boiler 1	SLM Boiler 2	Total 1 & 2	LLM Boiler 3	LLM Boiler 4	Total 3 & 4
Use Factor					41%	47%	
Size	MMBTU/hr				30	30	
Fuel					LPG	LPG	
	Sulfur (ppmw)				123	123	
	Sulfur (gr/100 ft3)				6.5	6.5	
	#/gallon				4.240	4.240	
	gph				186.8	186.8	
	BTU/#				21,580	21,580	
	gal/yr				1,112,669	1,270,288	2,382,957
Fuel Heat Value	Mbtu/gal				91.5	91.5	
Annual Heat Load	Mmbtu/yr				101,809	116,231	218,041
Annual Op	hrs/yr				5,958.0	6,802.0	

Actual Emissions**Pollutants**

Large Boilers (Boilers 3 and 4 combined)							
Calc'd Factors	0.1						
(#/1000 gallons)	0.65	13	7.5	1	0.7	0.7	0.7
Emissions							
(#/yr)	1,539	30,978	17,872	2,383	1,668	1,668	1,668
(ton/yr)	0.77	15.5	8.9	1.2	0.8	0.8	0.8
Value Used (tpy)	0.77	15.5	8.9	1.2	0.8	0.8	0.8
Total Emissions	0.77	15.49	8.94	1.19	0.83	0.83	0.83

Notes:

1. No HAPS listed as actual emissions because of no propane HAP emission factors.

Table 7
Yakama Forest Products
Kiln Emissions Calculations - Actual Emissions

		Actual Production								
Log Species	Small Log mbf/yr	Large Log mbf/yr	Total mbf/yr							
Grand Fir	Out of Service	6,950	6,950							
Douglas Fir		16,182	16,182							
Total Fir		23,132	23,132							
Pine		33,747	33,747							
Component				Pollutant						
	Criteria			HAPS						
	PM	PM10	VOC	Total	Methanol	Formaldehyde	Acetaldehyde	Propionaldehyde	Acrolein	
Equation Parameters (aT-b = EF)										
Grand Fir	a		0.00817		0.00465	0.00016				
	b		1.02133		0.7336	0.02764				
Douglas Fir	a		0.0146		0.00114	0.000028				
	b		1.7713		0.1609	0.0038				
Ponderosa Pine	a		0.02083		0.00137	0.000074				
	b		1.30029		0.18979	0.010457				
Emission Factor (#/MBF)										
	Temp oF									
Grand Fir	180	0.05	0.05	0.44927	0.16036	0.1034	0.00116	0.055	0.0003	0.0005
Douglas Fir	180	0.05	0.05	0.8567	0.07384	0.0443	0.00124	0.0275	0.0003	0.0005
Ponderosa Pine	180	0.05	0.05	2.44911	0.097273	0.05681	0.002863	0.034	0.001	0.0026
Actual Emissions (ton/yr)										
Kilns 1- 4					Out of Service					
Kilns 5 - 11		1.42	1.42	49.8	2.8	1.7	0.062	1.0	0.020	0.050
Total Kiln		1.42	1.42	49.8	2.8	1.7	0.062	1.0	0.020	0.050

Notes:

1. Emission factors (PM) from OREGON DEQ AQ-EF02
2. Emission factors (VOC & HAP) from USEPA Region X (Nov 2019).

Species	WPP1 VOC ^{1,2} (lb/mbf)	Methanol ² (lb/mbf)	Formaldehyde ² (lb/mbf)	Acetaldehyde (lb/mbf)	Propionaldehyde (lb/mbf)	Acrolein (lb/mbf)
Non-Resinous Softwood Species						
Western True Fir ³	0.00817x - 1.02133	0.00465x - 0.73360	0.00016x - 0.02764	0.0550	no data	no data
Western Hemlock	0.00369x - 0.39197	0.00249x - 0.39750	0.000048x - 0.007622	0.0677	0.0004	0.0012
Western Red Cedar	0.00817x - 1.02133	0.00465x - 0.73360	0.00016x - 0.02764	0.0677	0.0004	0.0012
Resinous Softwood Species (Non-Pine Family)						
Douglas Fir	0.01460x - 1.77130	0.00114x - 0.16090	0.000028x - 0.003800	0.0275	0.0003	0.0005
Engelmann Spruce	0.1768	0.00088x - 0.13528	0.000042x - 0.006529	0.0201	0.0002	0.0005
Larch	0.01460x - 1.77130	0.00114x - 0.16090	0.000028x - 0.003800	0.0275	0.0003	0.0005
Resinous Softwood Species (Pine Family)						
Lodgepole Pine	1.1352	0.0550	0.0030	no data	no data	no data
Ponderosa Pine	0.02083x - 1.30029	0.00137x - 0.18978	0.000074x - 0.010457	0.0340	0.0010	0.0026
Western White Pine	0.02083x - 1.30029	0.00137x - 0.18978	0.000074x - 0.010457	0.0340	0.0010	0.0026

Table 8
Yakama Forest Products
Mill Emissions Calculations - Summary

Loadings Summary

Component	Units	Small Log Mill			Large Log Mill			Total
		Grand Fir	Douglas Fir	Pine	Grand Fir	Douglas Fir	Pine	
Total BF	MMBF/yr	3,563	6,044	5,869	3,387	10,138	27,878	56,879
Hog Fuel	bdtpy	483	819	795	459	1,374	3,778	7,709
Green Chips	bdtpy	2,112	3,583	3,479	2,008	6,010	16,526	33,717
Dry Chips	bdtpy	0	0	0	0	0	0	0
Sawdust	bdtpy	968	1,643	1,595	921	2,756	7,577	15,460
Shavings	bdtpy	698	1,184	1,150	664	1,987	5,462	11,145

Emissions Summary

Parameter	Units	Cyclones				Bins										Mill Total
		C-1 SLM Shavings	C-2 LLM Sawdust	C-3 LLM Green Chips	C-4 LLM Shavings	HF1 SLM Hog Fuel	HF2 LLM Hog Fuel	SD1 SLM Sawdust	SD2 LLM Sawdust	GC1 SLM Green Chips	GC2 LLM Green Chips	DC1 SLM Dry Chips	DC2 LLM Dry Chips	SH1 SLM Shavings	SH2 LLM Shavings	
PM	tpy	0.76	2.81	6.14	2.03	0.0016	0.0042	0.0023	0.0042	0.0069	0.0092	0.0000	0.0000	0.0023	0.0061	11.77
PM10	tpy	0.64	2.39	5.22	1.72	0.0007	0.0020	0.0011	0.0020	0.0032	0.0043	0.0000	0.0000	0.0011	0.0028	9.99
PM25	tpy	0.38	1.41	3.07	1.01	0.0001	0.0003	0.0002	0.0003	0.0005	0.0006	0.0000	0.0000	0.0002	0.0004	5.87
VOC	tpy	0.54	2.34	4.44	1.73											9.05
Methanol	tpy	0.02	0.09	0.20	0.06											0.38

Table 9
Yakama Forest Products
Cyclone Emissions

Parameter	Units	Cyclones			
Source ID		C-1	C-2	C-3	C-4
Location		SLM	LLM	LLM	LLM
Material		Shavings	Sawdust	Green Chips	Shavings

Loadings

Grand Fir	bdtpy	698	921	2,008	664
Douglas Fir	bdtpy	1,184	2,756	6,010	1,987
Pine	bdtpy	1,150	7,577	16,526	5,462
Total	bdtpy	3,032	11,254	24,544	8,113

Emission Factors

PM	#/bdt	0.50	0.50	0.50	0.50
PM10	#/bdt	0.43	0.43	0.43	0.43
PM25	#/bdt	0.25	0.25	0.25	0.25

VOC

Grand Fir	#/bdt	0.2692	0.2386	0.0734	0.2692
Douglas Fir	#/bdt	0.2692	0.2386	0.0734	0.2692
Pine	#/bdt	0.5017	0.5017	0.5017	0.5017

Methanol	#/bdt	0.016	0.016	0.016	0.016
----------	-------	-------	-------	-------	-------

Emissions

PM	t/yr	0.8	2.8	6.1	2.0
PM10	t/yr	0.6	2.4	5.2	1.7
PM25	t/yr	0.4	1.4	3.1	1.0
VOC	t/yr	0.5	2.3	4.4	1.7

Table 10
Yakama Forest Products
Bin Emissions

Parameter	Units	Bins									
Source ID		HF1	HF2	SD1	SD2	GC1	GC2	DC1	DC2	SH1	SH2
Location		SLM	LLM	SLM	LLM	SLM	LLM	SLM	LLM	SLM	LLM
Material		Hog Fuel		Sawdust		Green Chips		Dry Chips		Shavings	
Loadings	bdtpy	2,097	5,611	3,032	11,254	9,174	24,544	0	0	3,032	8,113
Emission Factors											
Filling											
PM	#/bdt	0.00075	0.00075	0.00075	Cyclone C-2	0.00075	Cyclone C-3	0.0015	0.0015	Cyclone C-1	Cyclone C-4
PM10	#/bdt	0.00035	0.00035	0.00035		0.00035		0.0007	0.0007		
PM25	#/bdt	0.00005	0.00005	0.00005		0.00005		0.0001	0.0001		
Truck Loading											
PM	#/bdt	0.00075	0.00075	0.00075	0.00075	0.00075	0.00075	0.0015	0.0015	0.0015	0.0015
PM10	#/bdt	0.00035	0.00035	0.00035	0.00035	0.00035	0.00035	0.0007	0.0007	0.0007	0.0007
PM25	#/bdt	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.0001	0.0001	0.0001	0.0001
Emissions											
Filling											
PM	tpy	0.0008	0.0021	0.0011	Cyclone C-2	0.0034	Cyclone C-3	0.0000	0.0000	Cyclone C-1	Cyclone C-4
PM10	tpy	0.0004	0.0010	0.0005		0.0016		0.0000	0.0000		
PM25	tpy	0.0001	0.0001	0.0001		0.0002		0.0000	0.0000		
Truck Loading											
PM	tpy	0.0008	0.0021	0.0011	0.0042	0.0034	0.0092	0.0000	0.0000	0.0023	0.0061
PM10	tpy	0.0004	0.0010	0.0005	0.0020	0.0016	0.0043	0.0000	0.0000	0.0011	0.0028
PM25	tpy	0.0001	0.0001	0.0001	0.0003	0.0002	0.0006	0.0000	0.0000	0.0002	0.0004
Total											
PM	tpy	0.0016	0.0042	0.0023	0.0042	0.0069	0.0092	0.0000	0.0000	0.0023	0.0061
PM10	tpy	0.0007	0.0020	0.0011	0.0020	0.0032	0.0043	0.0000	0.0000	0.0011	0.0028
PM25	tpy	0.0001	0.0003	0.0002	0.0003	0.0005	0.0006	0.0000	0.0000	0.0002	0.0004

Note:

1. All emissions factors from Title V Permit

Table 11
Yakama Forest Products
Miscellaneous Non-fugitive Activities

Parameter	Units	Sawing Inside Buildings		Total
Location		SLM	LLM	
Loadings	tpy Logs	22,559	60,355	82,914
Emission Factors				
PM	#/tpy logs	0.35	0.35	
PM10	#/tpy logs	0.175	0.175	
PM25	#/tpy logs	0.0875	0.0875	
Control Efficiency		80%	80%	
Emissions				
PM	t/yr	0.8	2.1	2.9
PM10	t/yr	2.0	1.1	3.0
PM25	t/yr	1.0	0.5	1.5

Note:

1. All emissions factors from Title V Permit

Table 12

17	7
----	---

1. All emissions factors from Title V Permit

2. Wind erosion area is only for unpave area.

Table 13
Yakama Forest Products
Fugitive Dust Emissions Calculations

Paved EF Values		Unpaved EF Values	
Particle Size (PM10)	0.016 #/VMT	Particle Size	2.6 #/VMT
Silt Loading	7.4 gm/m2	Silt Content	8.4 %
		Surface Moisture	0.2 %
		Precip Days	200 Days

(Site is watered down 130 days per year)

Employee Vehicles and Product Pickup/Delivery (All paved roads)

Vehicle	Weight (pounds)	veh/t Days/yr	Trips/yr	Dis/RT (ft)	VMT/yr	EF (#/VMT)	PM10 (ton/yr)
Employee Vehicles	5,000	60	340	20,400	1,200	4,636	0.0285
Product Loadout	60,000	48	340	16,320	1,200	3,709	1.1843
						Total PM10	2.26

Yard Equipment Inventory

		0.75			0.5		0.5		0.5								
Vehicle	Location	Maximum	Maximum	Average	Maximum	Average	Gross	Vehicle	Average	%	%	Annual	VMT	VMT	Hours		
		Hours Per	Hours Per	Hours per	Vehicle	Vehicle	Vehicle	Empty	Gross	Paved	Unpaved						
		Day	Year	Year	Speed	Speed	Weight	Weight	Weight			VMT	Paved	Unpaved	Unpaved		
					(mph)	(mph)	(pounds)	(pounds)	(pounds)								
Forklifts																	
H-360 HD	SM-3	18	4,320	3,240	4	2	41,200	20,600	30,900	100%	0%	6480	6480	0	0		
H-360 HD	PM-3	12	2,880	2,160	4	2	41,200	20,600	30,900	100%	0%	4320	4320	0	0		
H-360 HD	PM/KILN-3	16	3,840	2,880	4	2	41,200	20,600	30,900	100%	0%	5760	5760	0	0		
H-360 HD	KILN-	16	3,840	2,880	4	2	41,200	20,600	30,900	100%	0%	5760	5760	0	0		
H-280	SM-2	9	2,160	1,620	4	2	34,800	17,400	26,100	100%	0%	3240	3240	0	0		
H-280	PM-2	9	2,160	1,620	4	2	34,800	17,400	26,100	100%	0%	3240	3240	0	0		
H-190 HD	SHIPPING-3	12	2,880	2,160	4	2	26,300	13,150	19,725	100%	0%	4320	4320	0	0		
H-190 HD	SHIPPING-3	12	2,880	2,160	4	2	26,300	13,150	19,725	100%	0%	4320	4320	0	0		
H-190 HD	SHIPPING-3	12	2,880	2,160	4	2	26,300	13,150	19,725	100%	0%	4320	4320	0	0		
H-190 HD	PM-3	11	2,640	1,980	4	2	26,300	13,150	19,725	100%	0%	3960	3960	0	0		
H-190 HD	PM-3	11	2,640	1,980	4	2	26,300	13,150	19,725	100%	0%	3960	3960	0	0		
H-190	PM-2	9	2,160	1,620	3	2	26,300	13,150	19,725	100%	0%	2430	2430	0	0		
H-190	PM/SHIP-2	10	2,400	1,800	3	2	26,300	13,150	19,725	100%	0%	2700	2700	0	0		
H-190	SHIPPING-2	11	2,640	1,980	3	2	26,300	13,150	19,725	100%	0%	2970	2970	0	0		
H-155	SM-2	2	480	360	2	1	13,500	6,750	10,125	100%	0%	360	360	0	0		
LULL	SM-2	1	240	180	2	1	9,000	4,500	6,750	90%	10%	180	162	18	18		
TRACTOR	SM-2	3	720	540	1	1	7,500	3,750	5,625	90%	10%	270	243	27	54		
Yard Equipment																	
CAT 950	MERCH	9	2,160	1,620	6	3	42,520	21,260	31,890	99%	1%	4860	4,811	49	16.2		
CAT 950	MERCH	9	2,160	1,620	6	3	42,520	21,260	31,890	99%	1%	4860	4,811	49	16.2		
CAT 950	MERCH	9	2,160	1,620	6	3	42,520	21,260	31,890	99%	1%	4860	4,811	49	16.2		
JD-200	MERCH	9	2,160	1,620	1	1	50,000	25,000	37,500	99%	1%	810	802	8	16.2		
LETRO	P-2	9	2,160	1,620	3	2	90,000	45,000	67,500	1%	99%	2430	24	2,406	1603.8		
LETRO	P-2	9	2,160	1,620	3	2	90,000	45,000	67,500	15%	85%	2430	365	2,066	1377		
LETRO	P-3	18	4,320	3,240	5	3	140,000	70,000	105,000	99%	1%	8100	8,019	81	32.4		
LETRO	P-3	9	1,800	1,350	5	3	140,000	70,000	105,000	99%	1%	3375	3,341	34	13.5		
JD-744	P-2	9	1,800	1,350	3	2	51,920	25,960	38,940	1%	99%	2025	20	2,005	1336.5		
JD-744	P-2	9	1,800	1,350	3	2	51,920	25,960	38,940	1%	99%	2025	20	2,005	1336.5		
CAT 966	P-2	9	1,800	1,350	3	2	51,980	25,990	38,985	1%	99%	2025	20	2,005	1336.5		
CAT 966	P-3	9	1,800	1,350	7	4	52,720	26,360	39,540	99%	1%	4725	4,678	47	13.5		
CAT 966	P-3	9	1,800	1,350	7	4	52,720	26,360	39,540	99%	1%	4725	4,678	47	13.5		
HITACHI	P-2	9	1,800	1,350	1	1	81,000	40,500	60,750	99%	1%	675	668	7	13.5		
HITACHI	P-2	9	1,800	1,350	1	1	81,000	40,500	60,750	99%	1%	675	7	668	1336.5		
MADILL	P-3	9	1,800	1,350	1	1	99,800	49,900	74,850	99%	1%	675	668	7	13.5		
MADILL	P-3	9	1,800	1,350	1	1	99,800	49,900	74,850	99%	1%	675	7	668	1336.5		
WATER 1	P-2&3	8	1,040	780	10	5	49,860	24,930	37,395	50%	50%	3900	1,950	1,950	390		
WATER 2	P-2&3	8	1,040	780	10	5	52,180	26,090	39,135	50%	50%	3900	1,950	1,950	390		
WATER 3	P-2&3	8	1,040	780	10	5	51,920	25,960	38,940	50%	50%	3900	1,950	1,950	390		
Averages							51,059	25,529	38,294	Totals		120,240	102,146	18,094	11,070		
Average Vehicle Weight -->							31,912			Average Unpaved Speed -->						1.63	

Notes:

1. Emission Factors from AP-42 Section 13.2

$$EF_{Paved} = k \left(\frac{SL}{2} \right)^{0.65} \left(\frac{W}{3} \right)^{1.5}$$

$$EF_{Unpaved} = k \left(\frac{SL}{12} \right)^{0.5} \left(\frac{W}{3} \right)^{0.4} \left(\frac{M}{0.2} \right)^{0.4} \left(\frac{S}{365 - P} \right)$$

where k = PM10 multiplier (#/yr), SL = Paved road silt loading (gm/m2),
W = vehicle weight (tons), s = surface material silt content (%), M = soil moisture (%),
S = speed (mph), and P = number of days of measurable precipitation.

Yard Emission Factor Calculation			
Variable	Units	Paved	Unpaved
k	#/VMT	0.016	2.6
SL	gm/m2	7.4	
W	tons	15.96	15.96
s	%	8.4	
S	mph	1.63	
M	%	0.2	
P	Days	200	
EF	#/VMT	0.46	0.64
Total miles	miles	120,240	102,146
Emissions	pounds	55,233	65,542

Total Fugitive Dust Emissions	
Yard Paved	55,233 Pounds
Yard Unpaved	65,542 Pounds
Employees	0.07 Pounds
Trucks	2.20 Pounds
Total	120,777 Pounds
	60.39 tons

Total Fugitive Dust Emissions	
Paved	55,236 Pounds
Unpaved	27.62 Tons
Total	65,542 Pounds
	32.77 Tons
Total	120,777 Pounds
	60.39 Tons

Lumber Production (mbf/yr)		Baseline		ProRate Value	
		135,988	11.55		
		Actual	56,879	13.71	Paved
		ProRate	42%	25.26 Tons	Unpaved
					Total

Attachment 6

Startup, Shutdown, and Malfunction Records

YFP DRY KILNS INVENTORY

**PLUGGED WITH CHEMICAL SULFITES AND FIXED SHUT OFF VALVE
PUMP#2 -DOWN 1.5 HOURS.**

08-10-18 boiler shut down at 18:45, steam header also-----DOWNTIME 1.5 HOURS

12/10/18 -----SHUT BOILER DOWN TO BRUSH OUT TUBES IN THE AM AT 18:35

**3/21/19----B-4 DOWN TO HOOK UP CHEMICAL TO REMOVE SCALE INSIDE
AND FIX CITY WATER LEAK. DOWNTIME 3.0 HRS.**

**05-20-19 shut down 8:30am start up 9:30 am one hour shut down time change out
sight glass**

**05-29-19 shut down 05-24-19 at noon. start up 06-17-19 hour start time 1400. sight
glass leak.**

06-22-19 shut down 06-22-19 at 1500. start up hour shut down time. sight glass leak.

7/8/19---- b-4 started at 7:50 am =377 hrs downtime

7/17/19----shut down b-4 7:00 am. only need one boiler for now.

09/11/19----shut down b-4 2215. only need one boiler for now.

11-4-19 shut down 1930 to 11-6-19 1200 .

11/12/19----external boiler inspection.

1/15/20 23:00 both boilers down on 1/16/20 0700 b-4 going in low fire

4/6/2020-----downtime 4 hours repair da regulator - called in yakima mechanics

4-09-2020 0100 boiler turnedoff

04-10-2020 begin draining boiler

**6/10/2020----- restarted boiler 4 to changeout sight glass in boiler 3=1,440 hours
downtime, due to coronavirus 19**

6-15-2020 -- shut down boiler nowood.0515

10-30-2020---- started boiler 4 7:30

10-22-2021 -- shut down boiler nowood. 7:30 power outage

07-27-2022 shut down boiler four @noon

01-30-2023 boiler shut down 0330 / started at 1030

04/19/2023 boilers down due to air compressor issues.

04/23/2023 boilers down at 0200 due to air compressor issues back online at 0800.

04/25/2023 boilers down for air compressor repairs.

04/26/2023 at 2015 boilers down due to air compressor issues back online at 2130.

**04/28/2023at 1415 boilers down switching to back up compressor, boilers back online at
1445.**

05/8/2023 boilers down for anual maintenance stopped at 0700.

05/14/2023 boilers backonline at 0800.

05/14/2023 boilers down at 0900 due to air dryer issues.

05/16/2023 boilers back online.

**06/5/2023 boiler down due to low usuage, not enough kilns running for boiler to be
needed.**

YFP DRY KILNS INVENTORY

07-24-18 boiler went down no water at 20:00 restart at 22:00 - 2.0 hours down .
 7/31/2018---BOILER #3 DOWN -LOW WATER -CLEANED DA Y-STRAINERS,
 PLUGGED WITH CHEMICAL SULFITES AND FIXED SHUT OFF VALVE PUMP
 #2----1.5 HRS
 08-08 -18 fisher valve changed- down 25 minutes
 08-10-18 boiler shut down at 18:45 steam header also --DOWNTIME 1.5 HOURS
 09-30-18 boiler is going low water, alarming and shuts down. gasket on front doors are
 blown out again.
 10-05-18 Mike from Yakima Mechanical out worked on boiler made adjustments up top

 10/24/2018 at 11: 00 am---- B-3 fd blower motor caught fire during blow down.
 changed motor, then tubes in boilers were leaking, had to clear tubes and have yakima
 mechanics roll the tubes ---- Back on line 10/31/2018 168 hrs.

 downtime.
 12/14/2018 at 11:15 am----Boiler shut down to cool down for retubing on monday the
 17th. Yakima mechanics here 12/17 to start cutting tubes out. b-3 started back up at
 3:30 AM ON 12/29/18----352 HOURS DOWNTIME
 01/27/2019 at 18:15 ----Boiler shut down going high water and hammering. Yakima
 mechanics need to be called in for repairs.
 3/21/19----b-3 down for 3 hrs to put chemical into boiler 4 and fix city water leak.
 downtime 3.0 hrs.
 05-20-19 Shut down 8:30 am start up 9:30am one hour shut down time. change out
 sight glass. back on line 6/17 at 1400.
 6/24/19 B-3 SHUT DOWN AT 1900 HOURS.
 7/8/19----b-3 started at 7:50 am =325 hrs downtime
 07-25-19 Boiler shut down at 8:45 ----started back up at 12:15 downtime 3.5 hours.
 07-25-19 boiler 3 shutdown 1530
 09-11-19 boiler 3 start 2120
 11-4-19 1930 to 1200 11-6-19 shut down and start up times. Added glycol too.
 11/12/19 external boiler inspection
 4/6/2020-----downtime 4 hours for da regulator repair - called in yakima mechanics
 04-10-2020 boiler shut down 1445
 06/01/2020 startup boiler 0830 down time 1241
 06-08-2020 shutdown for air compressor schange fluid and filters 1200 to 1;00'
 10/06/2021startup boiler 0730 down time ?
 10-22-2021 boiler shut down 7:30 power outage
 07-302022 boiler shut down for maintenance
 08-05-2022 boilerthree started at 9:00

YFP DRY KILNS INVENTORY

09-07-2022 boiler blew up due to liquid overflow approximately 2:30am

10-04-2022 boiler started alarmed, left off will not restart

10-05-2022 boiler got started, Mike from Yakima Mechanical

01-30-2023 boiler shut down 0330 start at 1430

04/19/2023 boiler down at 1015 due to air compressor issues, boiler back online at 1045

04/23/2023 boilers down for air compressor issues at 0200 back online at 0800.

04/25/2023 boilers down for air compressor repairs.

04/26/2023 at 2015 boilers down due to air compressor issues back online at 2130.

*04/28/2023 boilers down at 1415 due to air compressor switching to back up compressor
boilers back online at 1445.*

*05/8/2023 boilers down for annual shut down maintenance back online 05/14/2023 at
0800.*

*05/14/2023 boilers down at 0900 due to air dryer problems going to be down for a few
days in order to find a rental.*

05/16/2023 boilers back online at 0830 rental air dryer has arrived.