

# Public Comment

January 25, 2024

RCEA Board  
of Directors  
Regular Meeting

**From:** [Benjamin Scurfield](#)  
**To:** [Public Comment](#)  
**Subject:** solar in Humboldt  
**Date:** Wednesday, January 24, 2024 2:14:04 PM

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Some people who received this message don't often get email from [REDACTED]. [Learn why this is important](#)

Dear Redwood Energy Board,

I am writing to express my concerns over the NEM 3 solar policies.

What has been 60+ percent of my business has essentially vanished. In the 20 years we have been in business this is unprecedented.

As we struggle to shift our offerings I contemplate if I will need to start laying off staff.

My question to the board is are you able to offer some local rebates to help offset the cost of the battery installation?

Best regards,

Ben Scurfield

**From:** [Matty](#)  
**To:** [Public Comment](#)  
**Subject:** Urgent help needed for local solar industry as a result of recent CPUC rule changes  
**Date:** Thursday, January 25, 2024 2:34:03 PM

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To: Board of Directors.  
From Matty Tittmann, Greenwired Renewable Energy  
Re: NEM changes have resulted in unprecedented and catastrophic downturn in inquiry/  
sales for Grid connected solar

Dear Members of the RCEA board,

Greetings! My name is Matty Tittmann and I co owner of Greenwired Renewable Energy, a local solar/ storage and now hvac company.

For almost 20 years, Greenwired has grown from a few friends to one of the larger solar/ storage/ home energy services companies in the region. Our company began an off grid installation and retail sales company servicing the do it yourself homesteaders and cannabis industry based in the southern part of the county, selling fans, pumps, solar and batteries. We have now diversified into a full service, licensed electrical and solar contractor serving all the north coast with a 2nd office in Eureka.

Greenwired has installed hundreds of solar/storage systems; residential, commercial, and institutional, and have worked with homeowners, businesses, farms, ranches schools and local tribes to reduce their carbon footprint and become more energy independent, while providing stable employment for our local growing workforce. We recently added licensed HVAC to our suite of offerings.

The CPUC decision last December to transition new solar customers from Nem 2.0 to 3.0 has significantly negatively impacted our business.

We estimate a 75% reduction in sales inquiries after the rules changes went into effect last April, with number of contracts signed also significantly drastically reduced post April 15th. In addition to this huge drop off in sales, Nem 3.0 projects has forced our sales team to include battery in almost all sales and a sophisticated BMS (inverter) capable of peak load shifting to deliver stored solar power to the grid during high use times.

Additionally the VNEM and NEMA program sunsets on February 15, 2024 will also drastically reduce the viability for solar for many multi family/ commercial projects.

While the CPUC NEM 3.0 rule change decision provided a temporary boost in sales for Greenwired due to customer awareness of the transition and ability to lock into previous rate structure, if application was submitted before the deadline, our competent and efficient install crews are now working through our backlog of projects. We are hoping to avoid layoffs and keep our workers schedules full, continuing to deploy solar/ storage and HVAC on the north coast. Our conversations with other local installers convey a similar drastic downturn industry wide.

As an early community choice advocate on the North Coast and former member of RCEAs Community Advisory Committee for many years, I understand that RCEA has a complex array of priorities to navigate and fundamentally is trying to keep rates as low as possible for customers. I believe part of RCEA mandate is to support, whenever possible, local solar integration. We need more local solar integration to help meet CAs zero emission targets, yet these rule changes tragically incentivize the opposite.

I encourage the RCEA board to pass a resolution to direct staff to urgently define and

deploy cost saving incentives for local solar deployment that would help alleviate this terrible crisis and allow for some continued deployment of residential and solar and storage moving forward on the north coast

Some examples of this could be

- 1) generation adders or further incentives to encourage residential and commercial solar/ storage beyond what is currently offered through SGIP.
- 2) ensure staff are continued to be fully engaged in community/ installer outreach to ensure accessibility to federal/ state rebates for energy efficiency upgrades, including solar storage HVAC, and home efficiency

We wanted to make the board aware of this urgent matter. We would be happy to work with staff to help define some of these ideas further. Alternatively, we would be available to make a presentation or participate at a roundtable a future meeting or RCEA event.

As board members for RCEA, we thank you all for your dedication to our local energy future!

respectfully,

Matty Tittmann  
Greenwired



#### 4 Oral Communications

According to the North Coast Unified Air Quality Management District, the biomass plant in Scotia has been operating without a permit for two years. This indifference to the law fits a pattern of neglect that has resulted in numerous Clean Air Act violations after a failed smokestack test. Its neglect of periodic opacity monitor testing for six years casts doubt on its compliance with emissions standards during that time. Humboldt Sawmill Company was also served with a recent notice of Clean-Up and Abatement from the Regional Water Quality Board for polluting the Eel River.

Because burning wood to make electricity is an inherently dirty process, the state has set a low bar for the industry on the grounds that wood is renewable. The electricity it produces comes at the cost of higher CO2 emissions and more particulate and toxic air pollution than for any other electricity source. Its record of not testing its equipment or bothering to file the documentation for its permit distinguishes it from other electricity producers, including other biomass plants.

In 2019 RCEA signed a pledge, sponsored by 350 Humboldt, to supply Humboldt county with clean, renewable energy by 2025. Biomass electricity in general does not qualify. Biomass electricity from Scotia fails even more miserably to inspire community trust. RCEA extending its contract with HSC to 2031 confounds all of us who support RCEA's stated mission.

As the emergency of climate change intensifies, we must throw our support to real solutions. That includes solutions for how to dispose of woody waste. HSC apparently has no incentive to move towards alternatives other than incineration as long as RCEA buys its product. Please keep your pledge. and honor your commitment to help Humboldt county clean up its energy supply. You have ample grounds for ending your contract with Humboldt Sawmill Company.

Martha Walden  
member of 350 Humboldt

**From:** [Louis Rodriguez](#)  
**To:** [Lori Taketa](#)  
**Subject:** FW: Comment for 1/24 board meeting  
**Date:** Wednesday, January 24, 2024 9:56:24 AM

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Wanted to make sure you have this one also. I didn't say from Public Comment.

**Louis Rodriguez**

Customer Service Associate | Redwood Coast Energy Authority  
Office (707) 269-1700 x 306 | [REDACTED] | [www.RedwoodEnergy.org](http://www.RedwoodEnergy.org)  
Email: [lrodriguez@redwoodenergy.org](mailto:lrodriguez@redwoodenergy.org)  
Pronouns: he/him

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**From:** Lynda McDevitt [REDACTED]  
**Sent:** Wednesday, January 24, 2024 9:25 AM  
**To:** Redwood Coast Energy Authority <[info@redwoodenergy.org](mailto:info@redwoodenergy.org)>  
**Subject:** Comment for 1/24 board meeting

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To RCEA Board,

I was shocked to hear that the Scotia Biomass Plant has been operating for 2 years without a permit from the NC Air Quality Management Board. This has allowed the Biomass plant to commit numerous violations which should null and void the contract it has with RCEA.

Cancel the contract immediately.

Sincerely,

Lynda McDevitt

January 24, 2024

Dear RCEA Board Members,

As a RCEA ratepayer for the cleanest greenest option offered, I urge you to keep your promise to provide all ratepayers electricity from 100% clean, renewable sources by 2025. Humboldt Sawmill Company's (HSC) biomass plant does not provide clean electricity.

Biomass burning is dirty and pollutes our air. HSC's biomass plant emits toxic pollutants and 2.5 micron particulates which are a major health hazard. HSC's biomass plant emissions are a significant proportion of our county's annual GHG emissions, almost 300,000 metric tons of carbon dioxide per year. HSC's rebuttal to this statement is a quote from CARB Technical Support Document from California's 2000-2015 GHG Emission Inventory (2016 edition): "The GHG inventory includes only the CH<sub>4</sub> and N<sub>2</sub>O emissions resulting from the combustion of biomass fuels since the CO<sub>2</sub> emissions would have occurred eventually as the biomass decayed. These CO<sub>2</sub> emissions labeled 'from biogenic materials' are estimated and tracked, but are not included in California's GHG inventory total."

Compare the key phrase, "eventually as the biomass decayed" to the rate of CO<sub>2</sub> emissions from burning biomass 24/7. When the rate of CO<sub>2</sub> emission exceeds the rate of CO<sub>2</sub> sequestration, atmospheric CO<sub>2</sub> increases and global warming increases. From NOAA data printed on the front page of the Times-Standard, January 20, 2024, the Daily Average CO<sub>2</sub> for the week beginning on January 7, 2024 is 3.95 ppm higher than it was for the same week a year ago, and 25.23 ppm higher than it was for the same time 10 years ago. This shows us that CO<sub>2</sub> emissions are increasing at an increasing rate.

Thanks to Dr. Wendy Ring's research, we have evidence of HSC's many violations of the Clean Air and Clean Water acts, including water

violations for polluting the Eel River. HSC's continuous air quality violations while under contract with RCEA, documented by NCUAQ Management District (Notice of violation No. 14038 on dates 1/14/23, 1/19/23, 1/22/23) show us the company is violating conditions of the contract, and puts profit over the health and safety of our community. I strongly urge RCEA to implement the option of canceling the existing contract with HSC that applies into 2031. I prefer to have my ratepayer dollars go toward solar, wind, energy storage, geothermal, small hydro and wave energy conversion instead of welfare for the wealthy owners of HSC.

The HSC Scotia plant has ample area for utility scale solar, iron flow energy storage and microgrid installation to provide energy to assist running the mill and drying the wood and reduce the need for diesel used in black starts. I urge you to investigate options to help subsidize HSC to get them to move in this direction because ending the biomass contract alone will not reduce the current GHG emissions and toxic pollutants.

Thank you for having the courage to stand up to private for-profit corporations in order to serve the ratepayers in our County.

Diane Ryerson



Arcata, CA 95521

**From:** [Walter Paniak](#)  
**To:** [Public Comment](#)  
**Subject:** Scotia Power permit to operate  
**Date:** Wednesday, January 24, 2024 12:43:44 PM  
**Attachments:** [HRC NCU 060-12 1-31-17.pdf](#)

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The revelation that HRC does not have a current approved EPA Permit to Operate shows negligence and the board has a **duty of care** both in the fiduciary sense and your responsibility to rate payers to insure compliance or end the contract.

A copy of Permit to Operate is attached to this email.

The time line for compliance is clear. I would suggest a 3 to 5 year audit review of all the pollution items listed in the permit.

Each of the 3 boilers is allowed to use up to 1.47 million gallons of diesel fuel per year . How can you call this carbon free to meet the 2025 goal?

Walt Paniak  
Arcata resident

# PERMIT TO OPERATE

**NCU 060-12**

**HUMBOLDT REDWOOD COMPANY, LLC  
SCOTIA, CA**

**JULY 20, 1998**

**rev. 1 AUGUST 10, 1999**

**rev. 2 JULY 18, 2000**

**rev. 3 JANUARY 22, 2003**

**rev. 4 MAY 28, 2003**

**rev. 5 JANUARY 29, 2015**

**rev. 6 JANUARY 5, 2016**

**rev. 7 JANUARY 31, 2017**

**NORTH COAST UNIFIED  
AIR QUALITY  
MANAGEMENT DISTRICT**

**707 L STREET  
EUREKA, CALIFORNIA 95501**

**PHONE (707) 443-3093  
FAX (707) 443-3099**

NORTH COAST UNIFIED AIR QUALITY MANAGEMENT DISTRICT

# PERMIT TO OPERATE

NCU 060-12

HUMBOLDT REDWOOD COMPANY, LLC

**LEGAL OWNER OR OPERATOR:**

Humboldt Redwood Company, LLC  
PO Box 37  
169 Main Street  
Scotia, CA 95565

Responsible Official and Plant Contact:  
Michael Richardson, Mill Operations Manager  
(707) 764-5141

**BUSINESS ACTIVITY:** A power production plant.

**EQUIPMENT LOCATED AT:** The plant is located in the northwestern portion of California within the County of Humboldt and is about 25 miles to the south of Eureka, the County seat and is located at the town of Scotia, a Pacific Lumber Company owned town. Scotia is located adjacent to highway 101 and in an Eel River drainage canyon.

Whereas a timely application for a Permit to Operate has been made by Humboldt Redwood Company, LLC (hereinafter called the Permittee) pursuant to Regulation 5 (implementation of federal Title V operating permits) of the Rules and Regulations of the North Coast Unified Air Quality Management District (hereinafter called the District), and said application has been reviewed and found complete by the Air Pollution Control Officer of said District (hereinafter referred to as the Control Officer or NCUAQMD).

Unless otherwise noted, all requirements in this PERMIT are federally enforceable.

This is your Permit to Operate (hereinafter called PERMIT) subject to the following terms and conditions:

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## LIST OF ABBREVIATIONS

Administrator	Administrator of the Environmental Protection Agency
Act	Clean Air Act
CARB	California Air Resources Board
CEMS	continuous emissions monitoring system
CFR	Code of federal regulations
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
dscf	dry standard cubic foot
deg. F	degrees Fahrenheit
DEQ	Department of Environmental Quality
District	North Coast Unified Air Quality Management District
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
gr/acf	grains per actual cubic foot
gr/dscf	grains per dry standard cubic foot
lbs/hr	pounds per hour
MMBtu	million British thermal units
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
O <sub>2</sub>	oxygen
pH	hydrogen ion concentration in a solution
ppmv	parts per million by volume
PSD	Prevention of Significant Deterioration
tpy	tons per year
unit	single emissions unit

## PERMIT UNITS

### A. Combustion Processes

(1) Permit Number - **NS-074 (Steam Generator)**

Name - Boiler A

**I. BASIC EQUIPMENT** - The permittee operates a 150,000 pounds steam per hour (235 million Btu/hr heat input) boiler manufactured by Riley Stoker Company. A 90 million Btu/hr diesel oil burner is used to supply heat for startups.

**II. CONTROL EQUIPMENT** - Particulate matter is controlled with multiple cyclones followed by an electrostatic precipitator manufactured by General Electric Co. The unit has three separate transformer/rectifier fields and a collection plate area of 42,120 sq.ft. Two of the fields are rated at 50 KVA and one at 35 KVA. A forced overfire air system is utilized to help control gaseous emissions.

### III EMISSIONS LIMITATIONS

#### A. Particulate Matter

**1. Particulate loading** - The permittee shall not discharge particulate matter into the atmosphere in excess of 0.04 pounds per million Btu of heat input [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91].

**2. Visible emissions** - The permittee shall not cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. The opacity standard applies at all times except during periods of startup, shutdown, or malfunction [40 CFR 60.43b(f) [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91].

**B. Carbon Monoxide** - The permittee shall not discharge carbon monoxide into the atmosphere on a 24 hour average basis in excess of the following allowances:

Limits, lbs/mmbtu, 24 hr. avg.

TierCO

1	1.2	Base limit
2	>1.2 – 2.0	
3	>2.0 – 3.0	

Tier 1 - Base limit, 24 hour average which is the lower limit, needs to be attained for the highest percentage of time.

The total 24 hourly averages per month of Tier 2, and Tier 3, which are greater than the Base limit may not exceed eight. In no case shall the total 24 hourly averages per month exceed 3 for Tier 3.

**C. Nitrogen Oxides** - The permittee shall not discharge nitrogen oxides (as NO<sub>2</sub>) into the atmosphere on a 24 hour average basis in excess of the following allowances:

Limits, lbs/mmbtu, 24 hr. avg.

TierNOx

1	0.20	Base limit
2	0.21 – 0.22	
3	0.23 – 0.26	

Tier 1 - Base limit, 24 hour average which is the lower limit, needs to be attained for the highest percentage of time.

The total 24 hourly averages per month of Tier 2 and Tier 3 which are greater than the Base limit may not exceed eight. In no case shall the total 24 hourly averages per month exceed 3 for Tier 3.

### IV. COMPLIANCE MONITORING

**A.** The following methods shall be used for determining compliance with the above emissions limitations:

**1. Particulate Matter** - CARB Method 5 or other EPA approved method.

The permittee shall be required to have particulate matter from the boiler tested once per calendar year. If the compliance test result is less than one-half the permitted limit, then the next year compliance test may be waived by the District [Regulation 1, Rule 240(d)].

**2. Visible Emissions** - The permittee shall operate at all times a continuous opacity monitoring system (COMS) [40 CFR 60.48b(a)].

- a. 40 CFR 60, Appendix B, Performance Specification 1 shall be the basis for the operation of the COMS [40 CFR 60.49b(b)].
3. **Carbon Monoxide and Nitrogen Oxides** - The permittee shall operate at all times and maintain a continuous emissions monitoring system (CEMS) for the determination of carbon monoxide, nitrogen oxides and oxygen from the boiler [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91]. The CEMS shall be operated in conformance with 40 CFR, Part 60, Appendix B, Performance Specifications, and Appendix F, Quality Assurance Procedures [Regulation 1, Rule 240(d)]. Monitoring shall be conducted in accordance with 40 CFR Part 60.13 unless a more restrictive requirement is contained in the permit.
4. **Annual Relative Accuracy Test Audit (RATA)** - In order to verify compliance with emissions limits, the CEMS shall undergo an annual Relative Accuracy Test Audit (RATA) for Nitrogen Oxides and Carbon Monoxide.

**V. REPORTING AND RECORDKEEPING** - see General Provisions, section F.

- A. The permittee shall maintain data on the operation of the boiler which shall include the temperature, pressure and flow of steam production [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91].
- B. The permittee shall maintain records of opacity 6-minute averages [40 CFR 60.49b(f)].
- C. The permittee shall report all occurrences of excess emissions to the District in accordance with the timing requirements of Regulation 1, Rule 540, Equipment Breakdown [Regulation 1, Rule 240(d)].
- D. A monthly report of the daily and monthly averages of carbon monoxide, nitrogen oxides, and oxygen emissions shall be submitted to the District with the monthly monitoring report required in General Provisions section F.6.[Regulation 1, Rule 240(d)].
- E. The permittee shall maintain records of the hourly, daily and monthly averages for carbon monoxide, nitrogen oxides, and oxygen [Regulation 1, Rule 240(d)].
- F. The permittee shall maintain diesel oil fuel usage information in order to calculate the annual capacity factor [40 CFR 60.49b(d)].
- G. The permittee shall maintain a log of the nitrogen content of the diesel oil received as fuel for the boiler. Nitrogen content shall be measured using the most current ASTM method, by methods approved by the District, or as certified by the supplier [40 CFR 60.44b(k)].
- H. The permittee shall maintain a log of the amount, type of paper, date and time of any paper wastes burned in the boiler.

**VI. OPERATING CONDITIONS** - see General Provisions, section C.

- A. The boiler shall be fired only with wood wastes, diesel oil and paper wastes. Wood waste means sawmill or lumber wastes, or vegetation which are not treated with any chemicals. Painted wood is allowable provided that the paint is tested for lead. Lumber painted with lead based paints shall not be burned in the boiler. Paper wastes means newspaper, cardboard and any other paper excluding mixed paper from magazines or junk mail, or glossy paper waste. Paper waste use may not exceed 1 ton per day and must be less than 10% of the volume of the wastes burned in the boiler in a hour [Regulation 1, Rule 240(d)].
- B. The steam production from the boiler shall not exceed 150,000 pounds per hour, or in excess of 407,000 pounds per hour total for Boiler A, Boiler B and Boiler C on a monthly average basis [Regulation 1, Rule 220(b) Authority to Construct dated 1/14/87 and reissued on 4/26/89 and 9/24/91].
- C. The permittee shall continuously operate and maintain an electrostatic precipitator on the exhaust of the boiler [Regulation 1, Rule 220(b) Authority to Construct dated 1/14/87 and reissued on 4/26/89 and 9/24/91].
- D. The permittee shall not combust diesel oil with a nitrogen content greater than 0.30% by weight [40CFR 60.44b(k)].
- E. The annual capacity factor for diesel oil shall not exceed 10% for a calendar year [40 CFR 60.44b(k)]. This equates to a limitation of 1.47 million gallons of diesel oil per calendar year. The annual capacity factor for diesel oil is determined by dividing the actual heat input to the steam generating unit during the calendar year from the combustion of diesel oil, by the potential heat input to the steam generating unit if the steam generating unit had been operated for 8,760 hours at the maximum design heat input capacity [40 CFR 60.43b(e)].

(2) Permit Number - **NS-074 (Steam Generator)**

Name - Boiler B

**I. BASIC EQUIPMENT** - The permittee operates a 150,000 pounds steam per hour (235 million Btu/hr heat input) boiler manufactured by Riley Stoker Company. A 90 million Btu/hr diesel oil burner is used to supply heat for startups.

**II. CONTROL EQUIPMENT** - Particulate matter is controlled with multiple cyclones followed by an electrostatic precipitator manufactured by General Electric Co. The unit has three separate transformer/rectifier fields and a collection plate area of 42,120 sq.ft. Two of the fields are rated at 50 KVA and one at 35 KVA. A forced overfire air system is utilized to help control gaseous emissions.

**III EMISSIONS LIMITATIONS**

**A. Particulate Matter**

**1. Particulate loading** - The permittee shall not discharge particulate matter into the atmosphere in excess of 0.04 pounds per million Btu of heat input [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91].

**2. Visible emissions** - The permittee shall not cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. The opacity standard applies at all times except during periods of startup, shutdown, or malfunction [40 CFR 60.43b(f) [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91].

**B. Carbon Monoxide** - The permittee shall not discharge carbon monoxide into the atmosphere on a 24 hour average basis in excess of the following allowances:

Limits, lbs/mmbtu, 24 hr. avg.

- |   |            |            |
|---|------------|------------|
| 1 | 1.2        | Base limit |
| 2 | >1.2 – 2.0 |            |
| 3 | >2.0 – 3.0 |            |

Tier 1 - Base limit, 24 hour average which is the lower limit, needs to be attained for the highest percentage of time.

The total 24 hourly averages per month of Tier 2, and Tier 3, which are greater than the Base limit may not exceed eight. In no case shall the total 24 hourly averages per month exceed 3 for Tier 3.

**C. Nitrogen Oxides** - The permittee shall not discharge nitrogen oxides (as NO<sub>2</sub>) into the atmosphere on a 24 hour average basis in excess of the following allowances:

Limits, lbs/mmbtu, 24 hr. avg.

- |         |             |            |
|---------|-------------|------------|
| TierNOx |             |            |
| 1       | 0.20        | Base limit |
| 2       | 0.21 – 0.22 |            |
| 3       | 0.23 – 0.26 |            |

Tier 1 - Base limit, 24 hour average which is the lower limit, needs to be attained for the highest percentage of time.

The total 24 hourly averages per month of Tier 2 and Tier 3 which are greater than the Base limit may not exceed eight. In no case shall the total 24 hourly averages per month exceed 3 for Tier 3.

**IV. COMPLIANCE MONITORING**

**A.** The following methods shall be used for determining compliance with the above emissions limitations:

**1. Particulate Matter** - CARB Method 5 or other EPA approved method.

The permittee shall be required to have particulate matter from the boiler tested once per calendar year. If the compliance test result is less than one-half the permitted limit, then the next year compliance test may be waived by the District [Regulation 1, Rule 240(d)].

**2. Visible Emissions** - The permittee shall operate at all times a continuous opacity monitoring system (COMS) [40 CFR 60.48b(a)].

a. 40 CFR 60, Appendix B, Performance Specification 1 shall be the basis for the operation of the COMS [40 CFR 60.49b(b)].

5. **Carbon Monoxide and Nitrogen Oxides** - The permittee shall operate at all times and maintain a continuous emissions monitoring system (CEMS) for the determination of carbon monoxide, nitrogen oxides and oxygen from the boiler [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91]. The CEMS shall be operated in conformance with 40 CFR, Part 60, Appendix B, Performance Specifications, and Appendix F, Quality Assurance Procedures [Regulation 1, Rule 240(d)]. Monitoring shall be conducted in accordance with 40 CFR Part 60.13 unless a more restrictive requirement is contained in the permit.
6. **Annual Relative Accuracy Test Audit (RATA)** - In order to verify compliance with emissions limits, the CEMS shall undergo an annual Relative Accuracy Test Audit (RATA) for Nitrogen Oxides and Carbon Monoxide.

**V. REPORTING AND RECORDKEEPING** - see General Provisions, section F.

- A. The permittee shall maintain data on the operation of the boiler which shall include the temperature, pressure and flow of steam production [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91].
- B. The permittee shall maintain records of opacity 6-minute averages [40 CFR 60.49b(f)].
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- E. The permittee shall maintain records of the hourly, daily and monthly averages for carbon monoxide, nitrogen oxides, and oxygen [Regulation 1, Rule 240(d)].
- F. The permittee shall maintain diesel oil fuel usage information in order to calculate the annual capacity factor [40 CFR 60.49b(d)].
- G. The permittee shall maintain a log of the nitrogen content of the diesel oil received as fuel for the boiler. Nitrogen content shall be measured using the most current ASTM method, by methods approved by the District, or as certified by the supplier [40 CFR 60.44b(k)].
- H. The permittee shall maintain a log of the amount, type of paper, date and time of any paper wastes burned in the boiler.

**VI. OPERATING CONDITIONS** - see General Provisions, section C.

- A. The boiler shall be fired only with wood wastes, diesel oil and paper wastes. Wood waste means sawmill or lumber wastes, or vegetation which are not treated with any chemicals. Painted wood is allowable provided that the paint is tested for lead. Lumber painted with lead based paints shall not be burned in the boiler. Paper wastes means newspaper, cardboard and any other paper excluding mixed paper from magazines or junk mail, or glossy paper waste. Paper waste use may not exceed 1 ton per day and must be less than 10% of the volume of the wastes burned in the boiler in a hour [Regulation 1, Rule 240(d)].
- B. The steam production from the boiler shall not exceed 150,000 pounds per hour, or in excess of 407,000 pounds per hour total for Boiler A, Boiler B and Boiler C on a monthly average basis [Regulation 1, Rule 220(b) Authority to Construct dated 1/14/87 and reissued on 4/26/89 and 9/24/91].
- C. The permittee shall continuously operate and maintain an electrostatic precipitator on the exhaust of the boiler [Regulation 1, Rule 220(b) Authority to Construct dated 1/14/87 and reissued on 4/26/89 and 9/24/91].
- D. The permittee shall not combust diesel oil with a nitrogen content greater than 0.30% by weight [40CFR 60.44b(k)].
- E. The annual capacity factor for diesel oil shall not exceed 10% for a calendar year [40 CFR 60.44b(k)]. This equates to a limitation of 1.47 million gallons of diesel oil per calendar year. The annual capacity factor for diesel oil is determined by dividing the actual heat input to the steam generating unit during the calendar year from the combustion of diesel oil, by the potential heat input to the steam generating unit if the steam generating unit had been operated for 8,760 hours at the maximum design heat input capacity [40 CFR 60.43b(e)].

**(3) Permit Number - NS-076 (Steam Generator)**  
**Name - Boiler C**

**I. BASIC EQUIPMENT** - The permittee operates a 150,000 pounds steam per hour (235 million Btu/hr heat input) boiler manufactured by Riley Stoker Company. A 90 million Btu/hr diesel oil burner is used to supply heat for startups.

**II. CONTROL EQUIPMENT** - Particulate matter is controlled with multiple cyclones followed by an electrostatic precipitator manufactured by General Electric Co. The unit has three separate transformer/rectifier fields and a collection plate area of 42,120 sq.ft. Two of the fields are rated at 50 KVA and one at 35 KVA. A forced overfire air system is utilized to help control gaseous emissions.

**III EMISSIONS LIMITATIONS**

**A. Particulate Matter**

**1. Particulate loading** - The permittee shall not discharge particulate matter into the atmosphere in excess of 0.04 pounds per million Btu of heat input [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91].

**2. Visible emissions** - The permittee shall not cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. The opacity standard applies at all times except during periods of startup, shutdown, or malfunction [40 CFR 60.43b(f) [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91].

**B. Carbon Monoxide** - The permittee shall not discharge carbon monoxide into the atmosphere on a 24 hour average basis in excess of the following allowances:

Limits, lbs/mmbtu, 24 hr. avg.

- |   |            |            |
|---|------------|------------|
| 1 | 0.8        | Base limit |
| 2 | >0.8 – 1.0 |            |
| 3 | >1.0 – 1.5 |            |

Tier 1 - Base limit, 24 hour average which is the lower limit, needs to be attained for the highest percentage of time.

The total 24 hourly averages per month of Tier 2, and Tier 3, which are greater than the Base limit may not exceed eight. In no case shall the total 24 hourly averages per month exceed 3 for Tier 3.

**C. Nitrogen Oxides** - The permittee shall not discharge nitrogen oxides (as NO<sub>2</sub>) into the atmosphere on a 24 hour average basis in excess of the following allowances:

Limits, lbs/mmbtu, 24 hr. avg.

- |         |             |            |
|---------|-------------|------------|
| TierNOx |             |            |
| 1       | 0.22        | Base limit |
| 2       | 0.23 – 0.25 |            |
| 3       | 0.26 – 0.30 |            |

Tier 1 - Base limit, 24 hour average which is the lower limit, needs to be attained for the highest percentage of time.

The total 24 hourly averages per month of Tier 2 and Tier 3 which are greater than the Base limit may not exceed eight. In no case shall the total 24 hourly averages per month exceed 3 for Tier 3.

**IV. COMPLIANCE MONITORING**

**A.** The following methods shall be used for determining compliance with the above emissions limitations:

**1. Particulate Matter** - CARB Method 5 or other EPA approved method.

The permittee shall be required to have particulate matter from the boiler tested once per calendar year. If the compliance test result is less than one-half the permitted limit, then the next year compliance test may be waived by the District [Regulation 1, Rule 240(d)].

**2. Visible Emissions** - The permittee shall operate at all times a continuous opacity monitoring system (COMS) [40 CFR 60.48b(a)].

a. 40 CFR 60, Appendix B, Performance Specification 1 shall be the basis for the operation of the COMS [40 CFR 60.49b(b)].

7. **Carbon Monoxide and Nitrogen Oxides** - The permittee shall operate at all times and maintain a continuous emissions monitoring system (CEMS) for the determination of carbon monoxide, nitrogen oxides and oxygen from the boiler [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91]. The CEMS shall be operated in conformance with 40 CFR, Part 60, Appendix B, Performance Specifications, and Appendix F, Quality Assurance Procedures [Regulation 1, Rule 240(d)]. Monitoring shall be conducted in accordance with 40 CFR Part 60.13 unless a more restrictive requirement is contained in the permit.
8. **Annual Relative Accuracy Test Audit (RATA)** - In order to verify compliance with emissions limits, the CEMS shall undergo an annual Relative Accuracy Test Audit (RATA) for Nitrogen Oxides and Carbon Monoxide.

**V. REPORTING AND RECORDKEEPING** - see General Provisions, section F.

- A. The permittee shall maintain data on the operation of the boiler which shall include the temperature, pressure and flow of steam production [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91].
- B. The permittee shall maintain records of opacity 6-minute averages [40 CFR 60.49b(f)].
- C. The permittee shall report all occurrences of excess emissions to the District in accordance with the timing requirements of Regulation 1, Rule 540, Equipment Breakdown [Regulation 1, Rule 240(d)].
- D. A monthly report of the daily and monthly averages of carbon monoxide, nitrogen oxides, and oxygen emissions shall be submitted to the District with the monthly monitoring report required in General Provisions section F.6.[Regulation 1, Rule 240(d)].
- E. The permittee shall maintain records of the hourly, daily and monthly averages for carbon monoxide, nitrogen oxides, and oxygen [Regulation 1, Rule 240(d)].
- F. The permittee shall maintain diesel oil fuel usage information in order to calculate the annual capacity factor [40 CFR 60.49b(d)].
- G. The permittee shall maintain a log of the nitrogen content of the diesel oil received as fuel for the boiler. Nitrogen content shall be measured using the most current ASTM method, by methods approved by the District, or as certified by the supplier [40 CFR 60.44b(k)].
- H. The permittee shall maintain a log of the amount, type of paper, date and time of any paper wastes burned in the boiler.

**VI. OPERATING CONDITIONS** - see General Provisions, section C.

- A. The boiler shall be fired only with wood wastes, diesel oil and paper wastes. Wood waste means sawmill or lumber wastes, or vegetation which are not treated with any chemicals. Painted wood is allowable provided that the paint is tested for lead. Lumber painted with lead based paints shall not be burned in the boiler. Paper wastes means newspaper, cardboard and any other paper excluding mixed paper from magazines or junk mail, or glossy paper waste. Paper waste use may not exceed 1 ton per day and must be less than 10% of the volume of the wastes burned in the boiler in a hour [Regulation 1, Rule 240(d)].
- B. The steam production from the boiler shall not exceed 150,000 pounds per hour, or in excess of 407,000 pounds per hour total for Boiler A, Boiler B and Boiler C on a monthly average basis [Regulation 1, Rule 220(b) Authority to Construct dated 1/14/87 and reissued on 4/26/89 and 9/24/91].
- C. The permittee shall continuously operate and maintain an electrostatic precipitator on the exhaust of the boiler [Regulation 1, Rule 220(b) Authority to Construct dated 1/14/87 and reissued on 4/26/89 and 9/24/91].
- D. The permittee shall not combust diesel oil with a nitrogen content greater than 0.30% by weight [40CFR 60.44b(k)].
- E. The annual capacity factor for diesel oil shall not exceed 10% for a calendar year [40 CFR 60.44b(k)]. This equates to a limitation of 1.47 million gallons of diesel oil per calendar year. The annual capacity factor for diesel oil is determined by dividing the actual heat input to the steam generating unit during the calendar year from the combustion of diesel oil, by the potential heat input to the steam generating unit if the steam generating unit had been operated for 8,760 hours at the maximum design heat input capacity [40 CFR 60.43b(e)].

(4) Permit Number: #000936-2 rev. 2

Name: Dry Lumber Kilns #1-9

## AUTHORIZED EQUIPMENT

1. This permit authorizes the installation and operation of the following equipment:

**Table 1.0 - Authorized Process Equipment**

Device S-4	Dry Lumber Kilns #1-9
SCC	30700898
Description	Nine identically-sized and designed dry lumber kilns (Kilns #1-4 situated on south side of planer building. Kilns #5-9 situated farther south).
Application	Steam-heated enclosures used to dry lumber
Maximum Exhaust Air Temperature	190° Fahrenheit
Release Point	Fugitive

2. The Permittee shall install, utilize, and maintain temperature gauges to adequately measure the operating air temperature in each kiln that comprises S-4 (Dry Lumber Kilns). [NCUAQMD Rule 102(E)]

## OPERATIONAL CONDITIONS

3. The Permittee shall only process the type of lumber listed in Table 2.0 below in S-4 (Dry Lumber Kilns). [NCUAQMD Rule 102(E)]
4. The Permittee shall not operate S-4 (Dry Lumber Kilns) in such a manner so as to exceed the production limitations listed in Table 2.0 below:

**Table 2.0 - Production Limits (Dry Lumber Kilns)**

SPECIES	ANNUAL LIMIT (MMbf)
Redwood	119.7
Douglas Fir	40.1
White Fir	1.4
Pine	1.4
TOTAL (all species)	162.6

5. The Permittee shall not allow the operating air temperature of any kiln that comprises S-4 (Dry Lumber Kilns) to exceed 190 degrees Fahrenheit, as an hourly average. [NCUAQMD Rule 102(E)]



6. The Permittee shall keep the doors to S-4 (Dry Lumber Kilns) closed during active drying operations. [NCUAQMD Rule 102(E)]
7. The Permittee shall maintain all ducting, housings, fans, chambers, and exhaust stacks in a leak-free state during all times of operation. Emissions of exhaust gases visible to the unaided human eye shall not occur at any point upstream of the final release point. [NCUAQMD Rule 102(E)]
8. The Permittee shall develop, implement, and maintain a written *Device Operational Plan* that contains specific procedures for operating the authorized equipment and measuring devices. The plan shall be consistent with the requirements of this permit, and all local, state and federal laws, rules, and regulations. The plan shall include, but not be limited to, a program for recording operational parameters, and system integrity inspections. The plan shall be submitted to the APCO within 180 days of the issue date of this permit. Modifications to the plan are subject to APCO approval and the Permittee shall not operate the authorized equipment unless an APCO-approved *Device Operational Plan* is in effect. [NCUAQMD Rule 102(E)]
9. The Permittee shall take immediate corrective action to restore compliant operation upon detection of a malfunction or breakdown condition that causes or may cause a violation of any emissions limitation, as established in this permit or in District rules. [NCUAQMD Rule 102(E)]

## RECORDKEEPING & REPORTING

10. The Permittee shall record S-4 (Dry Lumber Kilns) operational parameters as listed in Table 3.0 below. [NCUAQMD Rule 102(E)]

**Table 3.0 Recordkeeping – S-4 (Dry Lumber Kilns)**

Frequency	Information to be recorded
Upon Occurrence	A. Maintenance or repairs performed B. Equipment breakdown or malfunction C. Date, start time, and end time of each excess emission event D. Date, start time, and end time of any hourly average operating temperature reading of 190 or greater (degrees Fahrenheit)
Hourly	E. Average operating temperature of each kiln (degrees Fahrenheit)
Monthly	F. Quantity (MMbf) of Redwood lumber processed G. Quantity (MMbf) of Douglas fir lumber processed H. Quantity (MMbf) of White fir lumber processed I. Quantity (MMbf) of Pine lumber processed J. Total quantity (MMbf) of lumber processed
Annually	K. Quantity (MMbf) of Redwood lumber processed L. Quantity (MMbf) of Douglas fir lumber processed M. Quantity (MMbf) of White fir lumber processed N. Quantity (MMbf) of Pine lumber processed O. Total quantity (MMbf) of lumber processed

11. The Permittee shall continuously record the operating air temperature, in degrees Fahrenheit, of each kiln comprising S-4 (Dry Lumber Kilns). [NCUAQMD Rule 102(E)]
12. The Permittee shall continuously maintain the records required in this section for the most recent five-year period. Records shall be retained on-site, either at a central location or at the equipment's location, and shall be made immediately available to the District staff upon request. [NCUAQMD Rule 102(E)]

**(5) Permit Number: #000937-2**

**Name: Knife Planer and Gang Trimmer**

## **AUTHORIZED EQUIPMENT**

1. This permit authorizes the installation and operation of the following equipment:

**Table 1.0 - Authorized Process Equipment**

<b>Device S-5</b>	Knife Planer
Application	Wood planing
SCC	30700805
Model	#3482 Knife Planer
Board Feet Rating	100,000 BF/hr
Control Device	Cyclone 1A & 1B (C-10), Cyclone 2 (C-11)
Release Point	E-4 and E-5
<b>Device S-6</b>	Gang Trimmer
Application	Wood trimming
SCC	30700805
Model	#728 24' RH High Speed Trimmer
Board Feet Rating	100,000 BF/hr
Control Device	Cyclone 1A & 1B (C-10), Cyclone 2 (C-11)
Release Point	E-4 and E-5

2. This permit authorizes the operation of the following control equipment:

**Table 2.0 - Authorized Control Equipment**

<b>Device C-10</b>	Cyclone 1A & 1B
Stack Release Height	70 ft.
Stack Diameter	7 ft. (inner)
Stack Exhaust Temp.	Ambient
Stack Flow Rate	51,500 acfm
Stack ID	E-2
Stack Location	10 T 406.620 km E 4480.876 km N (UTM NAD83)
<b>Device C-11</b>	Cyclone 2
Stack Release Height	75 ft.
Stack Diameter	7 ft. (inner)
Stack Exhaust Temp.	Ambient
Stack Flow Rate	7,100 acfm
Stack ID	E-3
Stack Location	10 T 406.564 km E 4481.038 km N (UTM NAD83)

3. The Permittee shall maintain ducting and air movers as necessary to convey the exhaust gases from the emission devices listed in the Authorized Equipment section of this Permit to their respective control devices. [NCUAQMD Rule 102(E)]

4. The wood/chip storage bin used to store the waste material collected by C-10 and C-11 shall have skirting, or similar device installed to facilitate the clean and direct transfer of collected material to a transport vehicle. [NCUAQMD Rule 102(E)]

### OPERATIONAL CONDITIONS

5. The Permittee shall not operate the Authorized Equipment subject to this permit in such a manner so as to exceed the production limits listed in Table 3.0 below:

**Table 3.0 - Production Limits**

DEVICE	UNITS	ANNUAL LIMIT
S-5 (Knife Planer)	Hours	4,160
S-6 (Gang Trimmer)	Hours	4,160

6. The Permittee shall maintain all ducting, housings, fans, chambers, exhaust stacks, and waste transfer and collection points in a leak-free state during all times of operation. Emissions of exhaust gases visible to the unaided human eye shall not occur at any point upstream of the final release point (stack). [NCUAQMD Rule 102(E)]
7. The Permittee shall operate the Authorized Equipment and Control Devices such that:
- All leaks of exhaust gas upstream of the final discharge point shall be repaired immediately.
  - Wood particles deposited on the roof of any building, on the ground, or elsewhere, shall be removed or controlled immediately, in accordance with an APCO-approved *Facility Dust Mitigation and Housekeeping Plan*.
8. The Permittee shall take immediate corrective action to restore compliant operation upon detection of a malfunction or breakdown condition that causes or may cause a violation of any emissions limitation, as established in this permit or in District rules. [NCUAQMD Rule 102(E)]

## EMISSION LIMITATIONS

9. The Permittee shall not discharge pollutants into the atmosphere from Cyclone 1A & 1B (E-4) in excess of the following limits in Table 4.0 below. [NCUAQMD Rule 102(E)]

**Table 4.0 – E-4 (Cyclone 1A & 1B) Emission Limits**

Pollutant	Emission Rate	
	lbs/hr	tons/yr
PM <sub>10</sub>	6.6	13.8
PM <sub>2.5</sub>	6.6	13.8

10. The Permittee shall not discharge pollutants into the atmosphere from Cyclone 2 (E-5) in excess of the following limits in Table 4.1 below. [NCUAQMD Rule 102(E)]

**Table 4.1 - E-5 (Cyclone 2) Emission Limits**

Pollutant	Emission Rate	
	lbs/hr	tons/yr
PM <sub>10</sub>	0.9	1.9
PM <sub>2.5</sub>	0.9	1.9

11. The Permittee shall not operate the Authorized Process Equipment S-5 and S-6 such that the exhaust gas discharged from E-2 or E-3 is in excess of 20% opacity, or as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, calculated as a six-minute average. [NCUAQMD Rule 104(B)(3)]
12. The Permittee shall not operate the Authorized Process Equipment S-5 and S-6 such that particulate matter is discharged from E-2 or E-3 is in excess of 0.015 grains per actual cubic foot of exhaust gas. [NCUAQMD Rule 102(E)]

## COMPLIANCE TESTING & MONITORING

13. The Permittee shall demonstrate compliance with the emission limits identified in this permit using the following methods, no less than once every three years after the initial performance test (June 19, 2012). If reported values for a pollutant are less than 50% of the permitted limits, the APCO may waive further compliance testing requirements for that pollutant. The Permittee shall cause an independent party which is CARB certified to conduct the source tests. All compliance tests shall be conducted at an operating capacity of 95% or greater of the permitted production capacity as stated in this permit, or under conditions determined by the APCO to most challenge the emission control equipment. Alternative testing procedures may be used if advance approval is obtained from the APCO.
- Particulate Matter - Oregon DEQ Method 8, and
  - Visible Emissions – EPA Reference Method 9. Permittee shall perform a “Visible Emission Evaluation” (VEE) concurrent with particulate matter testing.

14. The Permittee shall provide written notification to the District identifying the date the Authorized Equipment is to undergo testing for purposes of satisfying provisions of this Permit. Notification shall be made no later than 60 days prior to testing and shall include a compliance testing plan. The plan shall be subject to APCO review and approval. Testing conducted without an APCO-approved plan may be considered invalid or inadequate for compliance purposes. [NCUAQMD Rule 102(E)]
15. Source test results shall be summarized in a written report and submitted to the District directly from the independent source testing firm on the same day, the same time, and in the same manner as submitted to Permittee, no later than 60 days after the testing is completed. [NCUAQMD Rule 102(E)]

## **RECORDKEEPING & REPORTING**

16. The Permittee shall record the operational parameters for the Authorized Equipment as listed in Table 5.0 below.

**Table 5.0 – Recordkeeping (Knife Planer and Gang Trimmer)**

Frequency	Information to be recorded for each unit
Upon Occurrence	A. Maintenance or repairs performed B. Equipment breakdown or malfunction C. Excessive emission events
Weekly	D. Equipment condition
Monthly	E. Hours of operation
Annually	F. Hours of operation

17. The Permittee shall conduct weekly inspections of the Authorized Process Equipment, Authorized Control Equipment, ducting, and air movers, and shall record the condition of each, as indicated in Table 5.0 Recordkeeping. Inspections shall be conducted if the Authorized Process Equipment is in operation for any amount of time during the reporting period. [NCUAQMD Rule 102(E)]
18. The Permittee shall continuously maintain the records required in this section for the most recent five-year period. Records shall be retained on-site, either at a central location or at the equipment's location, and shall be made immediately available to the District staff upon request. [NCUAQMD Rule 102(E)]

**(6) Permit Number: #000938-2**

**Name: Emergency Compression Ignition Engine**

### **AUTHORIZED EQUIPMENT**

1. This permit authorizes the installation and operation of the following equipment:

**Table 1.0 - Authorized Process Equipment**

<b>Device S-7</b>	Emergency Standby Diesel CI Engine
<b>Application</b>	Standby Generator
<b>SCC</b>	20200102
<b>Generator Model</b>	Baldor UCI274F
<b>Engine Model</b>	John Deere 6068HF150
<b>Engine Family</b>	2JDXL06.8012 (Tier 1)
<b>Size</b>	251 Hp (187 kW) Standby @ 1800 rpm
<b>Year</b>	2002
<b>Serial Number</b>	PE6068H311023 (engine) / 0164876/15 (generator)
<b>Heat Input Rate</b>	1.7 MMBtu/hr (12.0 gal/hr)
<b>Release Point</b>	E-6
<b>Stack Location</b>	10 T 406.438 km E 4481.975 km N (UTM NAD83)

2. The Permittee shall utilize and maintain a non-resettable hour meter with a minimum display capability of 9,999 hours upon S-7 (Emergency Standby Diesel CI Engine). [17 CCR §93115.10(d) effective May 19, 2011]

### **OPERATIONAL CONDITIONS**

3. The Permittee shall only operate S-7 (Emergency Standby Diesel CI Engine) using one of the following fuels:
- CARB Diesel Fuel, or
  - An alternative diesel fuel that meets the requirements of the Verification Procedure (as codified in CCR Title 13 Sections 2700-2710), or
  - CARB Diesel Fuel used with fuel additives that meets the requirements of the Verification Procedure (as codified in CCR Title 13 Sections 2700-2710), or
  - Any combination of a) through c) above.

4. S-7 (Emergency Standby Diesel CI Engine) is authorized the following maximum allowable annual hours of operation as listed in Table 2.0 below: [17 CCR §93115 effective May 19, 2011]

**Table 2.0 - Hours of Operation for S-7 (Emergency CI Engine)**

Emergency Use	Non-Emergency Use	
	Emission Testing to show compliance	Maintenance & Testing
Not Limited by the ATCM	Not Limited by the ATCM	30 hours/year

5. The Permittee shall only operate S-7 (Emergency Standby Diesel CI Engine) in accordance with the most recent amendment of Title 17, California Code of Regulations section 93115.6(a)(3)(A), ATCM for Stationary CI Engines.
6. The Permittee shall maintain all ducting, housings, fans, chambers, and exhaust stacks in a leak-free state during all times of operation. Emissions of exhaust gases visible to the unaided human eye shall not occur at any point upstream of the final release point (stack).
7. The Permittee shall take immediate corrective action to restore compliant operation upon detection of a malfunction or breakdown condition that causes or may cause a violation of any emissions limitation, as established in this permit or in District rules. [NCUAQMD Rule 102(E)]

## EMISSION LIMITATIONS

8. The Permittee shall not discharge pollutants into the atmosphere from S-7 (Emergency Standby Diesel CI Engine) at rates in excess of the performance standards as listed in Table 3.0 below. [17 CCR §93115.10(d) effective May 19, 2011]

**Table 3.0 - S-7 (Emergency CI Engine) Performance Standards**

Pollutant	Performance Standards
	g/bhp-hr
PM	0.40
CO	8.5
NOx	6.9
HC	1.0



9. The Permittee shall not discharge pollutants into the atmosphere from release point E-6 (Diesel CI Engine Stack) in excess of the following limits in Table 4.0 below. Emissions generated during an emergency event or during emission testing for compliance purposes shall not contribute towards the hourly or annual emission limits. [NCUAQMD Rule 102(E)]

**Table 4.0 – E-6 (Diesel CI Engine Stack) Emission Limits**

Pollutant	Emission Rate	
	lb/hr	tons/year
PM <sub>10</sub>	0.22	3.32E-03
PM <sub>2.5</sub>	0.22	3.32E-03
NO <sub>x</sub>	3.82	5.73E-02
VOC	0.55	8.30E-03
CO	4.70	7.06E-02
SO <sub>x</sub>	0.0013	1.90E-05
CO <sub>2</sub> E	-	4.1

10. The Permittee shall not operate S-7 (Emergency Standby Diesel CI Engine) such that any air contaminant is discharged in excess of 20% opacity, or as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, calculated as a six-minute average. [NCUAQMD Rule 104(B)(3)]
11. The Permittee shall not discharge particulate matter into the atmosphere from release point E-6 (Diesel CI Engine Stack) in excess of 0.20 grains per cubic foot of dry gas calculated to 12% CO<sub>2</sub> at standard conditions. [NCUAQMD Rule 104(C)(1)]

## **COMPLIANCE TESTING & MONITORING**

12. The Permittee shall have the visible emissions from the Emergency Diesel CI Engine determined using EPA Reference Method 9 (Visible Emissions Evaluation) for opacity of exhaust gases within thirty (30) days after being directed by the APCO. [NCUAQMD Rule 102(E)]
13. The Permittee shall determine emission rates from S-7 (Emergency Standby Diesel CI Engine) using the test methods listed in 17 CCR §93115.14(a) within 30 days after being directed by the APCO. [NCUAQMD Rule 102(E)]

## RECORDKEEPING & REPORTING

16. The Permittee shall record S-7 (Emergency Standby Diesel CI Engine) operational parameters as listed in Table 5.0 below. [17 CCR §93115.10(g) effective May 19, 2011]

**Table 5.0 Recordkeeping – S-7 (Emergency CI Engine)**

Frequency	Information to be recorded
Upon Occurrence	A. Maintenance or repairs performed B. Equipment breakdown or malfunction C. Excessive emission events
Monthly	D. Emergency hours of operation E. Maintenance and testing hours of operation F. Emission testing hours of operation G. Quantity (gallons) of CARB Diesel combusted
Annually	H. Emergency hours of operation I. Maintenance and testing hours of operation J. Emission testing hours of operation K. Quantity (gallons) of CARB Diesel combusted

17. The permittee shall document the use of CARB Diesel through the retention of fuel purchase records indicating that the only fuel purchased for supply to S-7 (Emergency Standby Diesel CI Engine) was CARB Diesel. [NCUAQMD Rule 102(E)]
18. The Permittee shall retain records required by this section for a minimum of 36 months. Records shall be retained on-site, either at a central location or at the engine's location, and shall be made immediately available to the District staff upon request. [NCUAQMD Rule 102(E)]

**(7) Permit Number: #000973-2**

**Name: Natural Gas Boiler**

## **AUTHORIZED EQUIPMENT**

1. This permit authorizes the installation and operation of the following equipment:

**Table 1.0 - Authorized Process Equipment**

<b>Device S-8</b>	<b>External Combustion Boiler – Steam Generation</b>
<b>SCC</b>	10200602
<b>Application</b>	Generation of low-pressure steam to dry lumber in S-4 (Dry Lumber Kilns)
<b>Boiler Manufacturer</b>	Superior Boiler Works X6-S200-3000
<b>Burner Model</b>	Johnson NM-600-A
<b>Input Rating</b>	25.2 MMBtu/hr
<b>Output Rating</b>	20.7 KPPH Steam
<b>Fuel Type</b>	Natural Gas
<b>Release Point</b>	E-7 (Natural Gas Boiler Stack)

2. The Permittee shall vent Release Point E-7 vertically upward, which shall not be impeded by a rain cap or any other similar device that would impede vertical exhaust flow. [NCUAQMD Rule 102(E)]
3. The Permittee shall utilize and properly maintain a non-resettable totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted by S-8 (Natural Gas Boiler). [NCUAQMD Rule 102(E)]

## **OPERATIONAL CONDITIONS**

4. The Permittee shall only combust pipeline quality Natural Gas in S-8 (Natural Gas Boiler).
5. The Permittee shall not operate S-8 (Natural Gas Boiler) in such a manner so as to exceed the lesser of the following:
- The maximum capacity, rating, or design specification of the unit as identified in the Authorized Equipment Section of this permit;
  - The operational limitations specified in Table 2.0; or
  - One hundred and ten percent (110%) of the production rate at which the Authorized Equipment was operated during the most recent performance test in which compliance with all the conditions of this permit was demonstrated.

**Table 2.0 Operational Limits**

<b>Units</b>	<b>HOURLY LIMIT</b>
MMBtu	16.8 (monthly average)

6. The Permittee shall minimize S-8 (Natural Gas Boiler) startup and shutdown periods and conduct startups and shutdowns according to the manufacturer's recommended procedures. [NCUAQMD Rule 102(E)]
7. The Permittee shall maintain all ducting, housings, fans, chambers, exhaust stacks, and waste transfer and collection points in a leak-free state during all times of operation. Emissions of exhaust gases visible to the unaided human eye shall not occur at any point upstream of the final release point (stack).
8. The Permittee shall take immediate corrective action to restore compliant operation upon detection of a malfunction or breakdown condition that causes or may cause a violation of any emissions limitation, as established in this permit or in District rules. [NCUAQMD Rule 102(E)]

### EMISSION LIMITATIONS

9. The Permittee shall not discharge pollutants into the atmosphere from release point E-7 (Natural Gas Boiler Stack) in excess of the following limits in Table 3.0 below.

**Table 3.0 – Release Point E-7 (Main Stack) Emission Limits**

Pollutant	Emission Rate	
	lb/hr	tons/year
PM <sub>10</sub>	0.19	0.82
PM <sub>2.5</sub>	0.19	0.82
NO <sub>x</sub>	1.23	5.38
VOC	0.14	0.59
CO	2.06	9.04
SO <sub>x</sub>	0.01	0.06
CO <sub>2</sub> E	-	12,597

10. The Permittee shall not discharge particulate matter into the atmosphere from release point E-7 (Natural Gas Boiler Stack) in excess of 0.1 grains per standard cubic foot of exhaust gas, calculated to 12% carbon dioxide. [NCUAQMD Rule 104(C)(2)]
11. The Permittee shall not operate S-8 (Natural Gas Boiler) such that any air contaminant is discharged in excess of 20% opacity, or as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, calculated as a six-minute average. [NCUAQMD Rule 104(B)(3)]

## COMPLIANCE TESTING & MONITORING

12. The Permittee shall demonstrate compliance with the S-8 (Natural Gas Boiler) emission limits identified in this permit using the following methods, in the manner directed by the APCO, within 60 days after being so directed. [NCUAQMD Rule 102(E)]
  - a. NO<sub>x</sub>, CO – CARB Method 100
13. All compliance tests shall be conducted at 90% or greater of the maximum capacity, rating, or design specification of the unit as identified in the Authorized Equipment Section of this permit, or under conditions determined by the APCO to most challenge the emission control equipment. The Permittee may request that the equipment be tested under alternate parameters (e.g. different flow rate, production rate, feed rate). Any such request shall be submitted in writing and shall be fully described within the source testing protocol submitted pursuant to this permit. Testing using alternate parameters may result in modifications to operational limits as determined by the APCO.
14. The Permittee shall provide written notification to the District identifying the date the Authorized Equipment is to undergo testing for purposes of satisfying provisions of this Permit. Notification shall be made no later than 30 days prior to testing and shall include a compliance testing plan. The plan shall be subject to APCO review and approval. Testing conducted without an APCO-approved plan may be considered invalid or inadequate for compliance purposes. [NCUAQMD Rule 102(E)]
15. Source test results shall be summarized in a written report and submitted to the District directly from the independent source testing firm on the same day, the same time, and in the same manner as submitted to Permittee, no later than 60 days after the testing is completed. [NCUAQMD Rule 102(E)]
16. The Permittee shall conduct a tune-up of S-8 (Natural Gas Boiler), in a manner equivalent to 40 CFR §63.11223(b)(1)-(6), no later than June 21, 2017, and every two years thereafter. Each 2-year tune-up must be conducted no more than 25 months after the previous tune-up. [NCUAQMD Rule 102(E)]

## RECORDKEEPING & REPORTING

17. The Permittee shall record S-8 (Natural Gas Boiler) operational parameters as listed in Table 4.0 below. [NCUAQMD Rule 102(E)]

**Table 4.0 Recordkeeping (Natural Gas Boiler)**

Frequency	Information to be recorded
Upon Occurrence	A. Maintenance, repairs, or tune-ups performed B. Equipment breakdown or malfunction C. Excessive emission events D. Incident and duration of S-8 (Natural Gas Boiler) startup and shutdown events (hrs/event)
Monthly	E. Hours of operation F. Quantity of Natural Gas (MMCF) combusted in S-8 (Natural Gas Boiler) G. Average Natural Gas combustion rate (MMCF/hr)
Annually	H. Hours of operation I. Quantity of Natural Gas (MMCF) combusted in S-8 (Natural Gas Boiler)

14. The Permittee shall report to the NCUAQMD any malfunction or breakdown condition as soon as reasonably possible, but no later than one hour after its detection during normal office hours (9:00 a.m. to 4:00 p.m.), or one hour after the start of the next regular business day, whichever is sooner. [NCUAQMD Rule 105 §5.2.1.1]
15. The Permittee shall report to the NCUAQMD any deviations from the requirements of this permit, including those attributable to malfunction or breakdown conditions, the probable cause of the deviations, and any corrective actions or preventive measures taken. Within 10 days after occurrence, the Permittee shall submit a written report to the NCUAQMD which includes the following information regarding the event: [NCUAQMD Rule 105 §5.0]
- Duration of excessive emissions,
  - Estimation of the quantity of emissions,
  - Statement of the cause of the occurrence, and
  - Corrective measures taken to prevent recurrences.
16. The Permittee shall keep records to document the date of each tune-up performed pursuant to this permit, the procedures followed for tune-up, and the manufacturer's specifications to which S-8 (Natural Gas Boiler) was tuned. [NCUAQMD Rule 102(E)]
17. The Permittee shall continuously maintain the records required in this section for the most recent five-year period. Records shall be retained on-site, either at a central location or at the equipment's location, and shall be made immediately available to the District staff upon request. [NCUAQMD Rule 102(E)]

**(8) Permit Number: #000974-2**

**Name: Hot Mix Asphalt Plant**

## AUTHORIZED EQUIPMENT

1. This permit authorizes the installation and operation of the following equipment:

**Table 1.0 - Authorized Process Equipment**

<b>Device S-9</b> SCC Description Application Release Point	<b>Cold Aggregate Feed Bins</b> 30500216 Four 8' x 8' cold aggregate feed bins and associated gathering conveyor. Storage and transfer of aggregate materials to S-10 Fugitive
<b>Device S-10</b> SCC Description Application Release Point	<b>Cold Aggregate Feed Conveyor</b> 30500217 18" wide x 50' long inclined feed conveyor. Screening and transfer of aggregate materials to S-11A Fugitive
<b>Device S-11A</b> SCC Description Application Capacity Release Point	<b>Single-Deck Screen and Pug Mill</b> 305800231 2.5' x 5' single-deck scalping screen and single-shaft pug mill rated at 150 tons/hr Screening of cold aggregate and mixing 150 tons/hr Fugitive
<b>Device S-11B</b> SCC Description Application Capacity Aggregate Dryer Make/Model Burner Rating Primary Fuel Type Control Device Release Point	<b>Drum Mix Plant: Rotary Drum Dryer / Mixer, Oil-Fired, Parallel Flow</b> 30500259 Rotary drum aggregate dryer / mixer (parallel flow) with drag flight conveyor rated at 150 tons/hr Drying of aggregate, mixing of aggregate with liquid asphalt, and transfer of hot mix asphalt to S-3C 100 tons/hr finished hot mix asphalt Astec PFM-305  41.0 MMBtu/hr Diesel Oil C-12 (Baghouse) E-8

<b>Device S-11C</b>	<b>Storage Silo</b>
SCC	30500213
Description	30 ton hot mix asphalt surge bin with discharge gate
Application	Storage, transfer of finished hot mix asphalt to S-5C
Capacity	200 tons hot mix asphalt
Release Point	Fugitive
<b>Device S-11D</b>	<b>Truck Load-Out</b>
SCC	30500214
Application	Discharge of hot mix asphalt to transit truck
Release Point	Fugitive
<b>Device S-12</b>	<b>Heated Asphalt Storage Tank: Drum Mix</b>
SCC	30500212
Description	Asphalt storage tank
Application	Storage of liquid asphalt
Capacity	12,000 gallons
Burner Rating	0.5 MMBtu/hr
Release Point	E-9
<b>Device S-13</b>	<b>Heated Asphalt Storage Tank: Drum Mix</b>
SCC	30500212
Description	Asphalt storage tank; additional capacity for S-12
Application	Storage of liquid asphalt
Capacity	20,000 gallons (two 10,000 gallon compartments)
Burner Rating	n/a
Release Point	E-10

**Table 2.0 - Authorized Control Equipment**

<b>Device C-12</b>	<b>Baghouse</b>
Make/Model	Astec PPJ-20AC
Exhaust Flow Rate	20,000 cfm
Filter Type	Bag (acid-resistant Aramid felt, or equivalent)
Filter Dimensions	Diameter: 4 5/8" / Length: 8'
Cloth Filter Area	3,408 sq. ft. @ 5.9:1 air/cloth ratio
Method of Cleaning	Pulse jet
Pressure Drop	To be determined
Pollutants Controlled	PM
Emissions Device	S-11B (Rotary Drum Dryer/Mixer)
Controlled	
<b>Release Point</b>	<b>E-8</b>
Stack Location	To be determined

- The Permittee shall vent Release Point E-8 vertically upward, which shall not be impeded by a rain cap or any other similar device that would impede vertical exhaust flow. [NCUAQMD Rule 102(E)]



3. The Permittee shall equip C-12 (Baghouse) with a pressure differential gauge to indicate the pressure drop across the control device. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [NCUAQMD Rule 102(E)]
4. The Permittee shall install, utilize, and properly maintain a non-resettable totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted by S-11B (Rotary Drum Dryer/Mixer). [NCUAQMD Rule 102(E)]
5. The Permittee shall install, utilize, and properly maintain a non-resettable totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted by S-12 (Heated Asphalt Storage Tank). [NCUAQMD Rule 102(E)]
6. The Permittee shall install, utilize, and properly maintain a temperature gauge on the outlet of S-11B (Rotary Drum Dryer/Mixer) to measure the temperature of the finished hot mix asphalt. [NCUAQMD Rule 102(E)]

## OPERATIONAL CONDITIONS

7. The Permittee shall not operate the Authorized Equipment subject to this Permit in such a manner so as to exceed the lesser of the following:
  - a. The maximum capacity, rating, or design specification of the unit as identified in the Authorized Equipment Section of this permit;
  - b. The operational limitations specified in Table 3.0; or
  - c. One hundred and ten percent (110%) of the production rate at which the plant was operated during the most recent performance test where the plant demonstrated compliance with all the conditions of this permit.

**Table 3.0 Operational Limits**

UNITS	LIMIT		
	Hour	Day	Year
Tons Hot Mix Asphalt Produced	150	1,200	54,000

8. The Permittee shall only fire the Authorized Equipment subject to this Permit using one of the following fuels:
  - a. CARB Diesel Fuel, or
  - b. An alternative diesel fuel that meets the requirements of the Verification Procedure (as codified in CCR Title 13 Sections 2700-2710), or
  - c. CARB Diesel Fuel used with fuel additives that meet the requirements of the Verification Procedure (as codified in CCR Title 13 Sections 2700-2710), or
  - d. Any combination of a) through d) above. [NCUAQMD Rule 102(E)]
9. The Permittee shall not allow the finished asphalt hot mix temperature to exceed 325 degrees Fahrenheit at the outlet of S-11B (Rotary Drum Dryer/Mixer). [NCUAQMD Rule 102(E)]

10. Prior to being discharged into the atmosphere, the Permittee shall direct the exhaust gases created from operation of the Authorized Process Equipment through the Authorized Control Equipment identified in Tables 1.0 and 2.0 of this permit.
11. The Permittee shall operate C-1 (Baghouse) such that while S-11B (Rotary Drum Dryer/Mixer) is in operation, including startup and shutdown events, the differential pressure drop across C-1 shall be no greater than 11.0 inches WC and no less than 2.0 inches WC. [NCUAQMD Rule 102(E)]
12. The Permittee shall remove and dispose of material from C-12 (Baghouse) in a manner preventing entrainment into the atmosphere. [NCUAQMD Rule 102(E)]
13. The Permittee shall adjust the cleaning frequency and duration of C-12 (Baghouse) to optimize control efficiency. [NCUAQMD Rule 102(E)]
14. The Permittee shall minimize S-11B (Rotary Drum Dryer/Mixer) startup and shutdown periods and conduct startups and shutdowns according to the manufacturer's recommended procedures. [NCUAQMD Rule 102(E)]
15. The Permittee shall maintain all ducting, housings, fans, chambers, exhaust stacks, and waste transfer and collection points in a leak-free state during all times of operation. Emissions of exhaust gases visible to the unaided human eye shall not occur at any point upstream of the final release point (stack).
16. The Permittee shall exercise best management practices in the control of fugitive dust and accordingly shall implement the following conditions: [NCUAQMD Rule 104(D)]
  - a. Prior to any loading of materials, the material loaded shall be adequately wetted.
  - b. Exposed areas, inactive stockpiles, or quarried materials that are prone to mechanical or wind disturbances shall be adequately wetted, or controlled using 1) dust palliatives or suppressants, 2) paving, 3) wind berms or breaks; or 4) covered with tarps or other material.
  - c. All unpaved areas including access and haul roads, parking lots, and staging areas, or access roads shall be stabilized using one or more of the following measures: 1) dust palliatives or suppressants, 2) paving, 3) wind berms or breaks; or 4) covered with tarps or other material.
  - d. The speed of any vehicles at the plant site and on access and haul roads shall not exceed fifteen (15) miles per hour. This speed shall be posted on all access and haul roads. For the purposes of this permit, "plant site" means the area that includes all emission units and activities which may produce air contaminants, all stockpiles, staging areas, parking lots and all access and haul roads.
17. The Permittee shall minimize track-out onto paved public roadways by cleaning any visible track-out, using high powered water wash, wet sweeping, or a HEPA filter equipped vacuum device, as needed to prevent a public nuisance. [NCUAQMD Rule 102(E)]
18. The Permittee shall take immediate corrective action to restore compliant operation upon detection of a malfunction or breakdown condition that causes or may cause a violation of any emissions limitation, as established in this permit or in District rules. [NCUAQMD Rule 102(E)]

19. The Permittee shall implement, and maintain a written Startup, Shutdown, and Malfunction Plan as described in 40 CFR Part 63.6(e)(3), that contains specific procedures for maintaining the authorized equipment, associated control devices, sensors, measuring devices, during periods of startup, shutdown, and malfunction. The plan must clearly describe the startup and shutdown sequence procedure for each unit. The plan shall also include a specific program of corrective actions to be implemented in the event of a malfunction in either the process or control systems. The plan shall be submitted to the APCO at least 60 days prior to initial startup. Modifications to the plan are subject to APCO approval and the Permittee shall not operate the authorized equipment and their associated control devices unless an APCO-approved Startup, Shutdown, and Malfunction Plan is in effect.
20. The Permittee shall implement, and maintain a written Device Operational Plan that contains specific procedures for operating the authorized equipment, associated control devices, sensors, and measuring devices. The plan shall be consistent with the requirements of this permit, and all local, state and federal laws, rules, and regulations. The plan shall include, but not be limited to, daily system integrity inspections and the recording of operational parameters. The plan shall be submitted to the APCO at least 60 days prior to initial startup. Modifications to the plan are subject to APCO approval and the Permittee shall not operate the authorized equipment and their associated control devices unless an APCO-approved Device Operational Plan is in effect.
21. The Permittee shall implement, and maintain a written Device Maintenance & Replacement Plan that contains specific procedures for equipment maintenance and identifies replacement intervals for components of the authorized equipment, associated control devices, sensors, and measuring devices. The plan shall be submitted to the APCO at least 60 days prior to initial startup. The plan is subject to APCO approval. Modifications to the plan are subject to APCO approval and the Permittee shall not operate the authorized equipment and their associated control devices unless an APCO-approved Device Maintenance & Replacement Plan is in effect.

## **EMISSION LIMITATIONS**

22. The Permittee shall not discharge pollutants into the atmosphere from release point E-8 in excess of the following limits in Table 4.0 below.

**Table 4.0 – Release Point E-8 Emission Limits**

Pollutant	Emission Rate		
	lbs/hr	lbs/day	tons/year
PM10	6.9	79.9	0.4
PM2.5	6.9	49.9	0.4
NOx	8.3	49.9	1.5
VOC	4.8	49.9	0.9
CO	19.5	499.9	3.5
SOx	2.1	79.9	0.4

23. The Permittee shall not discharge PM into the atmosphere from release point E-8 in excess of 0.04 grain/dscf. [40 CFR §60.92(a)(1)]
24. The Permittee shall not discharge NO<sub>x</sub> (oxides of nitrogen) into the atmosphere from release point E-1 (Main Stack) in excess of 0.041 lbs/ ton of asphalt mix produced.
25. The Permittee shall not operate the Authorized Emission Devices such that visible emissions from the exhaust stacks of the Authorized Control Devices exceed 20% opacity for a period or periods aggregating more than three minutes in any one hour. [NCUAQMD Rule 104(B)(3) and 40 CFR §60.92(a)(2)]

## **COMPLIANCE TESTING & MONITORING**

26. The Permittee shall conduct source testing to demonstrate compliance with the particulate matter (PM) emissions concentration limit (grains/dscf), PM emission rate limit (lb/hr), and the visible emission (% opacity) limits of this Permit. Testing shall be conducted at intervals of at least once every three (3) years beginning on the day after the last source test was completed. The APCO may extend the testing date deadline up to an additional sixty (60) days for good cause. [NCUAQMD Rule 102(E)]
27. The Permittee shall demonstrate compliance with the E-1 (Main Stack) emission limits identified in this permit using the following methods. The Permittee shall cause an independent party that is CARB certified to conduct the source tests. Alternative testing procedures may be used if advance approval is obtained from the APCO. [NCUAQMD Rule 102(E)]
- a. PM – CARB Method 5 or equivalent EPA method.
  - b. Visible Emissions – EPA Method 9. Permittee shall perform a “Visible Emission Evaluation” (VEE) concurrent with particulate matter testing.
28. All compliance tests shall be conducted at 90% or greater of the maximum capacity, rating, or design specification of the unit as identified in the Authorized Equipment Section of this permit, or under conditions determined by the APCO to most challenge the emission control equipment. The Permittee may request that the equipment be tested under alternate parameters (e.g. different flow rate, production rate, feed rate). Any such request shall be submitted in writing and shall be fully described within the source testing protocol submitted pursuant to this permit. Testing using alternate parameters may result in modifications to operational limits as determined by the APCO.
29. The Permittee shall provide written notification to the District identifying the date the Authorized Equipment is to undergo testing for purposes of satisfying provisions of this Permit. Notification shall be made no later than 30 days prior to testing and shall include a compliance testing plan. The plan shall be subject to APCO review and approval. Testing conducted without an APCO-approved plan may be considered invalid or inadequate for compliance purposes. [NCUAQMD Rule 102(E)]
30. Source test results shall be summarized in a written report and submitted to the District directly from the independent source testing firm on the same day, the same time, and in the same

manner as submitted to Permittee, no later than 60 days after the testing is completed. [NCUAQMD Rule 102(E)]

31. The Permittee shall conduct a tune-up of S-11B (Rotary Drum Dryer/Mixer), in a manner equivalent to CFR §63.11223(b)(1)-(6) no later than August 21, 2018, and every two (2) years thereafter. Each 2-year tune-up must be conducted no more than 25 months after the previous tune-up.

## RECORDKEEPING & REPORTING

32. The Permittee shall record operational parameters as listed in Table 5.0 below. [NCUAQMD Rule 102(E)]

**Table 5.0 Recordkeeping**

Frequency	Information to be recorded
Upon Occurrence	A. Maintenance or repairs performed B. Equipment breakdown or malfunction C. Excessive emission events D. Testing & Tuning of the Rotary Drum Dryer Burner
Hourly	E. Weight (tons) of asphalt produced F. Pressure drop (inches WC) across baghouse
Daily	G. Weight (tons) of asphalt produced H. Quantity (gallons) of CARB Diesel combusted – consumption of each unit reported separately I. Hours of operation
Monthly	J. Weight (tons) of asphalt produced K. Quantity (gallons) of CARB Diesel combusted L. Hours of operation
Annually	L. Weight (tons) of asphalt produced M. Quantity (gallons) of CARB Diesel combusted N. Hours of operation

33. The Permittee shall continuously record the temperature, in degrees Fahrenheit, of the finished asphalt hot mix temperature at the outlet of S-11B (Rotary Drum Dryer/Mixer).
34. The Permittee shall report to the NCUAQMD any malfunction or breakdown condition as soon as reasonably possible, but no later than one hour after its detection during normal office hours (9:00 a.m. to 4:00 p.m.), or one hour after the start of the next regular business day, whichever is sooner. [NCUAQMD Rule 105(D)(2)(a)(i)]
35. The Permittee shall report to the NCUAQMD any deviations from the requirements of this permit, including those attributable to malfunction or breakdown conditions, the probable cause

of the deviations, and any corrective actions or preventive measures taken. Within 10 days after occurrence, the Permittee shall submit a written report to the NCUAQMD which includes the following information regarding the event: [NCUAQMD Rule 105(D)]

- a. Duration of excessive emissions,
- b. Estimation of the quantity of emissions,
- c. Statement of the cause of the occurrence, and
- d. Corrective measures taken to prevent recurrences.

36. The Permittee shall continuously maintain the records required in this section for the most recent five-year period. Records shall be retained on-site, either at a central location or at the equipment's location, and shall be made immediately available to the District staff upon request. [NCUAQMD Rule 102(E)]

## **B. Exempt Equipment**

Equipment and operations not specifically identified in this permit are not subject to specific federally-enforceable operating conditions or emission limitations. Such equipment and operations are subject to applicable General Provisions of this permit.

## GENERAL PROVISIONS

These general provisions apply to all facilities or sources owned or operated by the permittee as detailed in this permit.

- A. Fee Payment** - The Permittee shall pay an annual permit fee and other fees as required in accordance with Regulation 1, Rule 300 of the District. Failure to pay these fees will result in forfeiture of this Permit to Operate. Operation without a permit subjects the source to potential enforcement action by the District and the US EPA pursuant to section 502(a) of the Clean Air Act as amended in 1990[40 CFR 70.6(a)(7); Regulation 5, Rule 670].
- B. Inspection and Entry** - Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the District, CARB, EPA or an authorized representative to perform the following:
1. Enter upon the permittee's premises where a regulated facility or emissions-related activity is located or conducted, or where records must be kept under the conditions of this permit.
  2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
  3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the conditions of this permit. [40 CFR 70.6(c)(2); Regulation 5, Rule 610(e)]
- C. Facilities Operation**
1. Operation under this permit must be conducted in compliance with all data and specifications included in the application which attest to the operator's ability to comply with District Rules and Regulations [Regulation 1, Rule 240(d)].
  2. All nonexempt equipment of this permit shall at all times be maintained in good working order and be operated as efficiently as possible to assure compliance with all applicable emission limits [Regulation 1, Rule 240(d)].
  3. Operational Limit - This permit is valid for a maximum of 365 days per year at 24 hours per day [Regulation 1, Rule 240(d)].
- D. Compliance**
1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Clean Air Act and is grounds for enforcement action(including monetary civil penalties); for permit termination, revocation and reissuance, or modification; or for denial of an application for reissuance of the permit[40 CFR 70.6(a)(6); Regulation 5, Rule 610(g)].
  2. The need to halt or reduce activity is not a defense. It shall not be a defense for a permittee in an enforcement action that it would be necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [40 CFR 70.6(a)(6); Regulation 5, Rule 610(g)].
  3. A pending permit action or notification of anticipated noncompliance does not stay any permit condition[Regulation 5, Rule 610(g)(5)].
  4. The permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by this permit[40 CFR 70.6(a)(6)].



5. The permittee shall provide to the District on an annual basis a completed "Compliance Certification" form which certifies the compliance status of the facility, and on a semi-annual basis a monitoring certification form which provides certification of the monthly monitoring reports. The compliance certification and monitoring certification forms must be signed by a responsible company official and contain a statement that the information contained in the report is true, accurate, and complete. A semi-annual compliance certification report shall be submitted to document the compliance schedule of any source out of compliance[40 CFR 70.6(c); Regulation 5, Rules 460 and 610(g)].

6. Emergency events which occur at the permittee's plant which affect compliance with the terms of this permit must be reported to the District in accordance with Regulation 1, Rule 540. Emergency events are normally outside influences over which the permittee has no control[Regulation 5, Rule 460].

**E. Severability** - If any term or condition of this permit shall for any reason be adjudged by a court of competent jurisdiction to be invalid, such judgment shall not affect or invalidate the remainder of this permit[40 CFR 70.6(a)(5); Regulation 5, Rule 610(h)].

#### **F. Recordkeeping and Reporting**

1. The permittee shall retain records of all required monitoring data and support information including the date, place, time and results of any sampling or analysis, the operating conditions at the time of sampling for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and copies of all reports required by this permit[40 CFR 70.6(a)(3)(ii)(B); Regulation 5, Rule 455].

2. The permittee shall report to the District any deviations from these permit requirements, including those attributable to breakdown conditions, the probable cause of the deviations, and any corrective actions or preventive measures taken. Procedures of Regulation 1, Rule 540 shall be followed in the reporting of such deviations. A breakdown log shall be maintained for recordkeeping purposes[40 CFR 70.6(a)(3)(iii)(B); Regulation 5, Rule 460; Regulation 1, Rule 540].

3. The permittee shall report to the District calendar year plant operating information which includes the number of operating days, the amount of steam produced and the amount of diesel oil burned for each boiler[Regulation 1, Rule 240(d)].

4. The permittee shall maintain records of any startup or shutdown, any periods of malfunction of the air pollution control equipment, and any periods during which the CEMS or COMS are inoperative[40 CFR 60.7(b)].

5. The permittee shall submit by February 28<sup>th</sup> of each year, a combined report to comply with the General Provisions sections D.5 and F.3[Regulation 1, Rule 240(d)].

6. A monthly monitoring report shall be submitted to the District which identifies any deviation from these permit requirements including a summary of those deviations attributable to breakdowns, emergency events, CEMS or COMS malfunctions, emissions exceedances, and reporting or recordkeeping deviations required by this permit[Regulation 1 Rule 240(d)].

**G. Transfer of Ownership** -In the event of any changes in control or ownership of these facilities, this permit together with its terms and conditions shall be binding on all subsequent owners and operators. The permittee shall notify the succeeding owner and operator of the existence of this permit and its conditions by letter, a copy of which shall be forwarded to the District. Such permit transfer shall occur by application through the District[Regulation 1, Rule 240(j)].

#### **H. Reopening for Cause**

1. This permit may be modified, revoked, reopened, reissued, or terminated for the following reasons:
  - a. Additional requirements under the federal Clean Air Act become applicable to the facility for which three or more years remain on the original term of the permit. Such a reopening shall be completed

not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is to expire.

b. The District or EPA determines that the permit contains a material mistake made in establishing the emissions standards or limitations, or other requirements of the permit.

c. The District or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements. [40 CFR 70.7(f); Regulation 5, Rule 570]

2. The reopening of this permit for a change to be implemented for a specific permit unit will be allowed without the need to reopen the entire permit and all permit units. Should a general condition be changed, all the associated permit units affected would be reopened [Regulation 1, Rule 240(d)].

3. 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 70.6(a)(6)].

**I. Property Rights** - This permit does not convey any property rights of any sort, or any exclusive privilege [40 CFR 70.6(a)(6)].

**J. Permit Renewal and Expiration** - This permit is effective on the date of issuance and will expire in five years and must be renewed every five years thereafter. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted. For renewal of a permit, the designated representative shall submit a complete District application no earlier than 18 months and no later than 6 months before the expiration date of the current permit [40 CFR 70.5(a); Regulation 5, Rule 405(b)].

**K. Permit Modification** - The permittee shall submit an application for a minor or significant permit modification in accordance with District Regulation 5 [40 CFR 70.5(a); Regulation 5, Rule 405].

**L. Prohibitions** - These limitations apply to all emissions sources at the permittee's facility unless more specific and limiting requirements are listed for a individual permitted emissions unit in this permit.

1. **Public Nuisance** - The permittee shall not discharge such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public or which cause or have an natural tendency to cause injury or damage to business or property [H&S 41700].

2. **Visible Emissions** - The permittee shall not discharge into the atmosphere from any source whatsoever any air contaminant for a period or periods aggregating more than three (3) minutes in any one hour which is as dark or darker in shade as that designated as No. 2 on the Ringlemann Chart, as published by the United States Bureau of Mines; or of such opacity as to obscure an observer's view to a degree equal to or greater than Ringlemann 2 or forty (40) percent opacity [Regulation 1, Rule 410(a)].

3. **Fugitive Dust Emissions** - The handling, transporting, or open storage of material in such a manner which allow unnecessary amounts of particulate matter to become airborne, shall not be permitted. Reasonable precautions shall be taken to prevent particulate matter from becoming airborne [Regulation 1, Rule 430].

4. **Sulfur Oxide Emissions** - The permittee shall not discharge into the atmosphere from any single source of emissions whatsoever sulfur oxides, calculated as sulfur dioxide (SO<sub>2</sub>) in excess of 1,000 ppm [Regulation 1, Rule 440].

5. **Circumvention** - The permittee shall not construct, erect, modify, operate, or use any equipment which conceals an air contaminant emission, which would otherwise constitute a violation of the limitations of this permit, unless the operation or use of said equipment results in a significant reduction in the total emission of air contaminants [Regulation 1, Rule 400(b)].

6. **Regulation 2, Open Burning Procedures** - The permittee shall not ignite or cause to be ignited or suffer, allow or maintain any open outdoor fire for the disposal of rubber, petroleum or plastic wastes, demolition debris, tires, tar paper, wood waste, asphalt shingles, linoleum, cloth, household garbage or other combustible

refuse; or for metal salvage or burning of motor vehicle bodies except as provided in Rule 2-102, Exemptions[Regulation 2].

**7. Title VI, Stratospheric Ozone Protection** - The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, and 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

**8. National Emission Standard for Asbestos** - The permittee shall comply with the standards of 40 CFR Part 61 Subpart M which regulates demolition and renovation activities at the power plant as pertaining to asbestos materials.

This permit does not authorize the emission of air contaminants in excess of those allowed by the Health and Safety Code of the State of California or the Rules and Regulations of the North Coast Unified Air Quality Management District as stated in this permit. Any regulation or rule not cited in this permit which may be applicable to a particular emission unit will not be enforceable. This permit cannot be considered as permission to violate existing laws, ordinances, regulation or statutes of other governmental agencies. The violation of any of these terms and conditions shall be grounds for revocation of this permit, and shall be a violation of District Rules and Regulations.

**NORTH COAST UNIFIED  
AIR QUALITY  
MANAGEMENT DISTRICT**

707 L STREET  
EUREKA, CALIFORNIA 95501

PHONE (707) 443-3093  
FAX (707) 443-3099

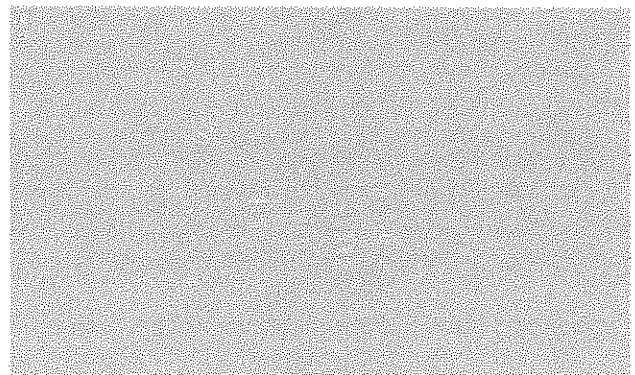
DATE:

1/31/17

BY:

Brian M. Wilson

BRIAN M. WILSON  
AIR POLLUTION CONTROL OFFICER



Permit Seal

**From:** [Patty Harvey](#)  
**To:** [Public Comment](#)  
**Subject:** Comment for Thurs."s Mtg  
**Date:** Wednesday, January 24, 2024 1:06:21 PM

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Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

I moved to Hum. Co. for it's beauty and clear water and air. Now we hear that daily our air is being compromised; to wit:

Biomass power plants emit more greenhouse gas and air pollution than power plants fueled by fossil gas or coal. Forty percent of the Redwood Coast Energy Authority's (RCEA) renewable energy comes from a biomass plant emitting over 300,000 tons of carbon dioxide equivalent a year.

Please stop this outrage, especially given that the Scotia plant has been operating for two years illegally. Thank you,

Patty Harvey  
Willow Creek

**From:** [Wendy Ring](#)  
**To:** [Public Comment](#)  
**Subject:** Public comment for 1-25-23 Board Meeting  
**Date:** Wednesday, January 24, 2024 1:49:04 PM  
**Attachments:** [HRC, Title V permit 1-31-17.pdf](#)  
[email from NCUAQMD with date of HSC's permit renewal application.eml.msg](#)

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Hi Lori. I could not figure out how to turn the attached email from the air district into a pdf. Maybe you can advise if the current format is not acceptable.

This comment is submitted on behalf of the Humboldt Coalition for Clean Energy, a group of 16 local green, faith, health, political, and community organizations and 2 statewide groups of doctors and nurses calling on RCEA to drop biomass from its renewable portfolio. You have received reports over the past 2 years about air and water violations at Humboldt Sawmill's biomass plant and lackadaisical enforcement by our local air district. Today we have even more disturbing news. For the past 2 years, the biomass plant has been operating without a Title V permit.

Title V permits are required by the federal Clean Air Act for every facility classified as a Major Source based on the tons of criteria pollutants it emits. These permits must be renewed every five years. The last permit, issued on 1/31/2017 expired on 1/31/2022. The air district's Air Pollution Control Officer Brian Wilson told me that the plant could keep operating legally under an application shield because it submitted a complete renewal application, but documents obtained under the CA Public Records Act and subsequent communications from Brian Wilson show that plant does not qualify for a shield because it submitted its renewal application in May of 2023, 2 years after the application deadline and a year and a half after the permit's expiration date. This is a blatant violation of the federal regulations and the air district's own Rule 502, with maximum civil and criminal penalties of over \$7 million and 5 years in jail, although the air district's long history of leniency toward the plant and the lack of violations or shut down orders for lacking a permit over the past two years make it unlikely such stiff penalties will be imposed.

A clause in the biomass PPA, which is celebrated on your website and in reports to the CPUC as an example of RCEA's sensitivity to environmental justice and community concerns, allows RCEA to terminate the contract early in the event of environmental violations. You have a physician and public health expert bringing you data on emissions, public health impacts, and regulatory failures; a county health officer testifying that the biomass plant sends 7-8 people a month to the emergency room, and a county medical society asking you to stop contracting for biomass energy, but so far you've chosen to do nothing because Matthew Marshall says biomass is

a good deal and reports that the air district tells him the biomass plant's environmental compliance is OK.

Things are clearly not OK. Biomass is dirty energy. Its full cost is not reflected on RCEA's balance sheets because most of it is externalized to the public, where it falls disproportionately on the most vulnerable members of society. Like any seller of a product, RCEA is morally responsible for the maintaining integrity of its supply chain, especially if the regulatory system intended to oversee it is broken. If RCEA lacks the staff, resources, or willingness to provide oversight of biomass energy's considerable environmental impacts, you should take this opportunity to remove it from your renewable portfolio. This might create a shortfall in meeting the RPS, but we doubt the CPUC would fine you for refusing to do business with a criminal, and it would only be temporary since RCEA has over 100 MW of new clean energy coming online next year and there is a glut of solar plus storage projects in CAISO's interconnection queue that will come online long before the biomass contract expires in 2031.

We have been unable to get on your board agenda to provide you with information that would better equip you to make decisions about biomass, but will soon be providing online "Biomass 101" trainings for the community covering the effectiveness of the Humboldt Sawmill Company biomass plant's pollution control and monitoring systems, relevant state and federal regulations and the air district's performance enforcing them, and the plant's reported emissions and their health and climate consequences. If you are interested in attending one of these training sessions, please email me and I will send you information on how to register. Alternatively, you could instruct RCEA staff to put a 45 minute presentation from our coalition (not a substitute or panel stacked with timber interests) on your own agenda. Below you will find links to documentation of the Title V permit regulations. The expired permit is attached, along with an email from Brian Wilson stating the date when HSC's renewal application was submitted.

350 Humboldt  
Humboldt Unitarian Climate Action Campaign  
EPIC  
Northcoast Environmental Center  
Women's Intl League for Peace and Freedom-Humboldt  
Humboldt Health Care for All  
Buddhist Peace Fellowship  
HOPE Coalition  
Redwood Alliance  
Lost Coast League  
Sierra Club Redwoods North Group  
Friends of the Eel River  
Humboldt Green Party  
Humboldt Democratic Central Committee

Humboldt Progressive Democrats

Climate Health Now

CA Alliance for Retired Americans-North State

CA Nurses for Environmental Health and Justice

[Code of Federal Regulations Permit issuance, renewals, openings, and revisions](#)

[NCUAQMD Rule 502 Application and permit requirements](#)

[Criminal Provisions of the Clean Air Act](#)



# PERMIT TO OPERATE

**NCU 060-12**

**HUMBOLDT REDWOOD COMPANY, LLC  
SCOTIA, CA**

**JULY 20, 1998**

**rev. 1 AUGUST 10, 1999**

**rev. 2 JULY 18, 2000**

**rev. 3 JANUARY 22, 2003**

**rev. 4 MAY 28, 2003**

**rev. 5 JANUARY 29, 2015**

**rev. 6 JANUARY 5, 2016**

**rev. 7 JANUARY 31, 2017**

**NORTH COAST UNIFIED  
AIR QUALITY  
MANAGEMENT DISTRICT**

**707 L STREET  
EUREKA, CALIFORNIA 95501**

**PHONE (707) 443-3093  
FAX (707) 443-3099**

NORTH COAST UNIFIED AIR QUALITY MANAGEMENT DISTRICT

# PERMIT TO OPERATE

NCU 060-12

HUMBOLDT REDWOOD COMPANY, LLC

**LEGAL OWNER OR OPERATOR:**

Humboldt Redwood Company, LLC  
PO Box 37  
169 Main Street  
Scotia, CA 95565

Responsible Official and Plant Contact:  
Michael Richardson, Mill Operations Manager  
(707) 764-5141

**BUSINESS ACTIVITY:** A power production plant.

**EQUIPMENT LOCATED AT:** The plant is located in the northwestern portion of California within the County of Humboldt and is about 25 miles to the south of Eureka, the County seat and is located at the town of Scotia, a Pacific Lumber Company owned town. Scotia is located adjacent to highway 101 and in an Eel River drainage canyon.

Whereas a timely application for a Permit to Operate has been made by Humboldt Redwood Company, LLC (hereinafter called the Permittee) pursuant to Regulation 5 (implementation of federal Title V operating permits) of the Rules and Regulations of the North Coast Unified Air Quality Management District (hereinafter called the District), and said application has been reviewed and found complete by the Air Pollution Control Officer of said District (hereinafter referred to as the Control Officer or NCUAQMD).

Unless otherwise noted, all requirements in this PERMIT are federally enforceable.

This is your Permit to Operate (hereinafter called PERMIT) subject to the following terms and conditions:

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## LIST OF ABBREVIATIONS

Administrator	Administrator of the Environmental Protection Agency
Act	Clean Air Act
CARB	California Air Resources Board
CEMS	continuous emissions monitoring system
CFR	Code of federal regulations
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
dscf	dry standard cubic foot
deg. F	degrees Fahrenheit
DEQ	Department of Environmental Quality
District	North Coast Unified Air Quality Management District
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
gr/acf	grains per actual cubic foot
gr/dscf	grains per dry standard cubic foot
lbs/hr	pounds per hour
MMBtu	million British thermal units
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
O <sub>2</sub>	oxygen
pH	hydrogen ion concentration in a solution
ppmv	parts per million by volume
PSD	Prevention of Significant Deterioration
tpy	tons per year
unit	single emissions unit

## PERMIT UNITS

### A. Combustion Processes

(1) Permit Number - **NS-074 (Steam Generator)**

Name - Boiler A

**I. BASIC EQUIPMENT** - The permittee operates a 150,000 pounds steam per hour (235 million Btu/hr heat input) boiler manufactured by Riley Stoker Company. A 90 million Btu/hr diesel oil burner is used to supply heat for startups.

**II. CONTROL EQUIPMENT** - Particulate matter is controlled with multiple cyclones followed by an electrostatic precipitator manufactured by General Electric Co. The unit has three separate transformer/rectifier fields and a collection plate area of 42,120 sq.ft. Two of the fields are rated at 50 KVA and one at 35 KVA. A forced overfire air system is utilized to help control gaseous emissions.

### III EMISSIONS LIMITATIONS

#### A. Particulate Matter

**1. Particulate loading** - The permittee shall not discharge particulate matter into the atmosphere in excess of 0.04 pounds per million Btu of heat input [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91].

**2. Visible emissions** - The permittee shall not cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. The opacity standard applies at all times except during periods of startup, shutdown, or malfunction [40 CFR 60.43b(f) [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91].

**B. Carbon Monoxide** - The permittee shall not discharge carbon monoxide into the atmosphere on a 24 hour average basis in excess of the following allowances:

Limits, lbs/mmbtu, 24 hr. avg.

TierCO

1	1.2	Base limit
2	>1.2 – 2.0	
3	>2.0 – 3.0	

Tier 1 - Base limit, 24 hour average which is the lower limit, needs to be attained for the highest percentage of time.

The total 24 hourly averages per month of Tier 2, and Tier 3, which are greater than the Base limit may not exceed eight. In no case shall the total 24 hourly averages per month exceed 3 for Tier 3.

**C. Nitrogen Oxides** - The permittee shall not discharge nitrogen oxides (as NO<sub>2</sub>) into the atmosphere on a 24 hour average basis in excess of the following allowances:

Limits, lbs/mmbtu, 24 hr. avg.

TierNOx

1	0.20	Base limit
2	0.21 – 0.22	
3	0.23 – 0.26	

Tier 1 - Base limit, 24 hour average which is the lower limit, needs to be attained for the highest percentage of time.

The total 24 hourly averages per month of Tier 2 and Tier 3 which are greater than the Base limit may not exceed eight. In no case shall the total 24 hourly averages per month exceed 3 for Tier 3.

### IV. COMPLIANCE MONITORING

**A.** The following methods shall be used for determining compliance with the above emissions limitations:

**1. Particulate Matter** - CARB Method 5 or other EPA approved method.

The permittee shall be required to have particulate matter from the boiler tested once per calendar year. If the compliance test result is less than one-half the permitted limit, then the next year compliance test may be waived by the District [Regulation 1, Rule 240(d)].

**2. Visible Emissions** - The permittee shall operate at all times a continuous opacity monitoring system (COMS) [40 CFR 60.48b(a)].

- a. 40 CFR 60, Appendix B, Performance Specification 1 shall be the basis for the operation of the COMS [40 CFR 60.49b(b)].
3. **Carbon Monoxide and Nitrogen Oxides** - The permittee shall operate at all times and maintain a continuous emissions monitoring system (CEMS) for the determination of carbon monoxide, nitrogen oxides and oxygen from the boiler [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91]. The CEMS shall be operated in conformance with 40 CFR, Part 60, Appendix B, Performance Specifications, and Appendix F, Quality Assurance Procedures [Regulation 1, Rule 240(d)]. Monitoring shall be conducted in accordance with 40 CFR Part 60.13 unless a more restrictive requirement is contained in the permit.
4. **Annual Relative Accuracy Test Audit (RATA)** - In order to verify compliance with emissions limits, the CEMS shall undergo an annual Relative Accuracy Test Audit (RATA) for Nitrogen Oxides and Carbon Monoxide.

**V. REPORTING AND RECORDKEEPING** - see General Provisions, section F.

- A. The permittee shall maintain data on the operation of the boiler which shall include the temperature, pressure and flow of steam production [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91].
- B. The permittee shall maintain records of opacity 6-minute averages [40 CFR 60.49b(f)].
- C. The permittee shall report all occurrences of excess emissions to the District in accordance with the timing requirements of Regulation 1, Rule 540, Equipment Breakdown [Regulation 1, Rule 240(d)].
- D. A monthly report of the daily and monthly averages of carbon monoxide, nitrogen oxides, and oxygen emissions shall be submitted to the District with the monthly monitoring report required in General Provisions section F.6.[Regulation 1, Rule 240(d)].
- E. The permittee shall maintain records of the hourly, daily and monthly averages for carbon monoxide, nitrogen oxides, and oxygen [Regulation 1, Rule 240(d)].
- F. The permittee shall maintain diesel oil fuel usage information in order to calculate the annual capacity factor [40 CFR 60.49b(d)].
- G. The permittee shall maintain a log of the nitrogen content of the diesel oil received as fuel for the boiler. Nitrogen content shall be measured using the most current ASTM method, by methods approved by the District, or as certified by the supplier [40 CFR 60.44b(k)].
- H. The permittee shall maintain a log of the amount, type of paper, date and time of any paper wastes burned in the boiler.

**VI. OPERATING CONDITIONS** - see General Provisions, section C.

- A. The boiler shall be fired only with wood wastes, diesel oil and paper wastes. Wood waste means sawmill or lumber wastes, or vegetation which are not treated with any chemicals. Painted wood is allowable provided that the paint is tested for lead. Lumber painted with lead based paints shall not be burned in the boiler. Paper wastes means newspaper, cardboard and any other paper excluding mixed paper from magazines or junk mail, or glossy paper waste. Paper waste use may not exceed 1 ton per day and must be less than 10% of the volume of the wastes burned in the boiler in a hour [Regulation 1, Rule 240(d)].
- B. The steam production from the boiler shall not exceed 150,000 pounds per hour, or in excess of 407,000 pounds per hour total for Boiler A, Boiler B and Boiler C on a monthly average basis [Regulation 1, Rule 220(b) Authority to Construct dated 1/14/87 and reissued on 4/26/89 and 9/24/91].
- C. The permittee shall continuously operate and maintain an electrostatic precipitator on the exhaust of the boiler [Regulation 1, Rule 220(b) Authority to Construct dated 1/14/87 and reissued on 4/26/89 and 9/24/91].
- D. The permittee shall not combust diesel oil with a nitrogen content greater than 0.30% by weight [40CFR 60.44b(k)].
- E. The annual capacity factor for diesel oil shall not exceed 10% for a calendar year [40 CFR 60.44b(k)]. This equates to a limitation of 1.47 million gallons of diesel oil per calendar year. The annual capacity factor for diesel oil is determined by dividing the actual heat input to the steam generating unit during the calendar year from the combustion of diesel oil, by the potential heat input to the steam generating unit if the steam generating unit had been operated for 8,760 hours at the maximum design heat input capacity [40 CFR 60.43b(e)].

(2) Permit Number - **NS-074 (Steam Generator)**  
Name - Boiler B

**I. BASIC EQUIPMENT** - The permittee operates a 150,000 pounds steam per hour (235 million Btu/hr heat input) boiler manufactured by Riley Stoker Company. A 90 million Btu/hr diesel oil burner is used to supply heat for startups.

**II. CONTROL EQUIPMENT** - Particulate matter is controlled with multiple cyclones followed by an electrostatic precipitator manufactured by General Electric Co. The unit has three separate transformer/rectifier fields and a collection plate area of 42,120 sq.ft. Two of the fields are rated at 50 KVA and one at 35 KVA. A forced overfire air system is utilized to help control gaseous emissions.

**III EMISSIONS LIMITATIONS**

**A. Particulate Matter**

**1. Particulate loading** - The permittee shall not discharge particulate matter into the atmosphere in excess of 0.04 pounds per million Btu of heat input [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91].

**2. Visible emissions** - The permittee shall not cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. The opacity standard applies at all times except during periods of startup, shutdown, or malfunction [40 CFR 60.43b(f) [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91].

**B. Carbon Monoxide** - The permittee shall not discharge carbon monoxide into the atmosphere on a 24 hour average basis in excess of the following allowances:

Limits, lbs/mmbtu, 24 hr. avg.

- |   |            |            |
|---|------------|------------|
| 1 | 1.2        | Base limit |
| 2 | >1.2 – 2.0 |            |
| 3 | >2.0 – 3.0 |            |

Tier 1 - Base limit, 24 hour average which is the lower limit, needs to be attained for the highest percentage of time.

The total 24 hourly averages per month of Tier 2, and Tier 3, which are greater than the Base limit may not exceed eight. In no case shall the total 24 hourly averages per month exceed 3 for Tier 3.

**C. Nitrogen Oxides** - The permittee shall not discharge nitrogen oxides (as NO<sub>2</sub>) into the atmosphere on a 24 hour average basis in excess of the following allowances:

Limits, lbs/mmbtu, 24 hr. avg.

- |         |             |            |
|---------|-------------|------------|
| TierNOx |             |            |
| 1       | 0.20        | Base limit |
| 2       | 0.21 – 0.22 |            |
| 3       | 0.23 – 0.26 |            |

Tier 1 - Base limit, 24 hour average which is the lower limit, needs to be attained for the highest percentage of time.

The total 24 hourly averages per month of Tier 2 and Tier 3 which are greater than the Base limit may not exceed eight. In no case shall the total 24 hourly averages per month exceed 3 for Tier 3.

**IV. COMPLIANCE MONITORING**

**A.** The following methods shall be used for determining compliance with the above emissions limitations:

**1. Particulate Matter** - CARB Method 5 or other EPA approved method.

The permittee shall be required to have particulate matter from the boiler tested once per calendar year. If the compliance test result is less than one-half the permitted limit, then the next year compliance test may be waived by the District [Regulation 1, Rule 240(d)].

**2. Visible Emissions** - The permittee shall operate at all times a continuous opacity monitoring system (COMS) [40 CFR 60.48b(a)].

a. 40 CFR 60, Appendix B, Performance Specification 1 shall be the basis for the operation of the COMS [40 CFR 60.49b(b)].

5. **Carbon Monoxide and Nitrogen Oxides** - The permittee shall operate at all times and maintain a continuous emissions monitoring system (CEMS) for the determination of carbon monoxide, nitrogen oxides and oxygen from the boiler [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91]. The CEMS shall be operated in conformance with 40 CFR, Part 60, Appendix B, Performance Specifications, and Appendix F, Quality Assurance Procedures [Regulation 1, Rule 240(d)]. Monitoring shall be conducted in accordance with 40 CFR Part 60.13 unless a more restrictive requirement is contained in the permit.
6. **Annual Relative Accuracy Test Audit (RATA)** - In order to verify compliance with emissions limits, the CEMS shall undergo an annual Relative Accuracy Test Audit (RATA) for Nitrogen Oxides and Carbon Monoxide.

**V. REPORTING AND RECORDKEEPING** - see General Provisions, section F.

- A. The permittee shall maintain data on the operation of the boiler which shall include the temperature, pressure and flow of steam production [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91].
- B. The permittee shall maintain records of opacity 6-minute averages [40 CFR 60.49b(f)].
- C. The permittee shall report all occurrences of excess emissions to the District in accordance with the timing requirements of Regulation 1, Rule 540, Equipment Breakdown [Regulation 1, Rule 240(d)].
- D. A monthly report of the daily and monthly averages of carbon monoxide, nitrogen oxides, and oxygen emissions shall be submitted to the District with the monthly monitoring report required in General Provisions section F.6.[Regulation 1, Rule 240(d)].
- E. The permittee shall maintain records of the hourly, daily and monthly averages for carbon monoxide, nitrogen oxides, and oxygen [Regulation 1, Rule 240(d)].
- F. The permittee shall maintain diesel oil fuel usage information in order to calculate the annual capacity factor [40 CFR 60.49b(d)].
- G. The permittee shall maintain a log of the nitrogen content of the diesel oil received as fuel for the boiler. Nitrogen content shall be measured using the most current ASTM method, by methods approved by the District, or as certified by the supplier [40 CFR 60.44b(k)].
- H. The permittee shall maintain a log of the amount, type of paper, date and time of any paper wastes burned in the boiler.

**VI. OPERATING CONDITIONS** - see General Provisions, section C.

- A. The boiler shall be fired only with wood wastes, diesel oil and paper wastes. Wood waste means sawmill or lumber wastes, or vegetation which are not treated with any chemicals. Painted wood is allowable provided that the paint is tested for lead. Lumber painted with lead based paints shall not be burned in the boiler. Paper wastes means newspaper, cardboard and any other paper excluding mixed paper from magazines or junk mail, or glossy paper waste. Paper waste use may not exceed 1 ton per day and must be less than 10% of the volume of the wastes burned in the boiler in a hour [Regulation 1, Rule 240(d)].
- B. The steam production from the boiler shall not exceed 150,000 pounds per hour, or in excess of 407,000 pounds per hour total for Boiler A, Boiler B and Boiler C on a monthly average basis [Regulation 1, Rule 220(b) Authority to Construct dated 1/14/87 and reissued on 4/26/89 and 9/24/91].
- C. The permittee shall continuously operate and maintain an electrostatic precipitator on the exhaust of the boiler [Regulation 1, Rule 220(b) Authority to Construct dated 1/14/87 and reissued on 4/26/89 and 9/24/91].
- D. The permittee shall not combust diesel oil with a nitrogen content greater than 0.30% by weight [40CFR 60.44b(k)].
- E. The annual capacity factor for diesel oil shall not exceed 10% for a calendar year [40 CFR 60.44b(k)]. This equates to a limitation of 1.47 million gallons of diesel oil per calendar year. The annual capacity factor for diesel oil is determined by dividing the actual heat input to the steam generating unit during the calendar year from the combustion of diesel oil, by the potential heat input to the steam generating unit if the steam generating unit had been operated for 8,760 hours at the maximum design heat input capacity [40 CFR 60.43b(e)].



**(3) Permit Number - NS-076 (Steam Generator)**  
**Name - Boiler C**

**I. BASIC EQUIPMENT** - The permittee operates a 150,000 pounds steam per hour (235 million Btu/hr heat input) boiler manufactured by Riley Stoker Company. A 90 million Btu/hr diesel oil burner is used to supply heat for startups.

**II. CONTROL EQUIPMENT** - Particulate matter is controlled with multiple cyclones followed by an electrostatic precipitator manufactured by General Electric Co. The unit has three separate transformer/rectifier fields and a collection plate area of 42,120 sq.ft. Two of the fields are rated at 50 KVA and one at 35 KVA. A forced overfire air system is utilized to help control gaseous emissions.

**III EMISSIONS LIMITATIONS**

**A. Particulate Matter**

**1. Particulate loading** - The permittee shall not discharge particulate matter into the atmosphere in excess of 0.04 pounds per million Btu of heat input [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91].

**2. Visible emissions** - The permittee shall not cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. The opacity standard applies at all times except during periods of startup, shutdown, or malfunction [40 CFR 60.43b(f) [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91].

**B. Carbon Monoxide** - The permittee shall not discharge carbon monoxide into the atmosphere on a 24 hour average basis in excess of the following allowances:

Limits, lbs/mmbtu, 24 hr. avg.

- |   |            |            |
|---|------------|------------|
| 1 | 0.8        | Base limit |
| 2 | >0.8 – 1.0 |            |
| 3 | >1.0 – 1.5 |            |

Tier 1 - Base limit, 24 hour average which is the lower limit, needs to be attained for the highest percentage of time.

The total 24 hourly averages per month of Tier 2, and Tier 3, which are greater than the Base limit may not exceed eight. In no case shall the total 24 hourly averages per month exceed 3 for Tier 3.

**C. Nitrogen Oxides** - The permittee shall not discharge nitrogen oxides (as NO<sub>2</sub>) into the atmosphere on a 24 hour average basis in excess of the following allowances:

Limits, lbs/mmbtu, 24 hr. avg.

- |         |             |            |
|---------|-------------|------------|
| TierNOx |             |            |
| 1       | 0.22        | Base limit |
| 2       | 0.23 – 0.25 |            |
| 3       | 0.26 – 0.30 |            |

Tier 1 - Base limit, 24 hour average which is the lower limit, needs to be attained for the highest percentage of time.

The total 24 hourly averages per month of Tier 2 and Tier 3 which are greater than the Base limit may not exceed eight. In no case shall the total 24 hourly averages per month exceed 3 for Tier 3.

**IV. COMPLIANCE MONITORING**

**A.** The following methods shall be used for determining compliance with the above emissions limitations:

**1. Particulate Matter** - CARB Method 5 or other EPA approved method.

The permittee shall be required to have particulate matter from the boiler tested once per calendar year. If the compliance test result is less than one-half the permitted limit, then the next year compliance test may be waived by the District [Regulation 1, Rule 240(d)].

**2. Visible Emissions** - The permittee shall operate at all times a continuous opacity monitoring system (COMS) [40 CFR 60.48b(a)].

a. 40 CFR 60, Appendix B, Performance Specification 1 shall be the basis for the operation of the COMS [40 CFR 60.49b(b)].

7. **Carbon Monoxide and Nitrogen Oxides** - The permittee shall operate at all times and maintain a continuous emissions monitoring system (CEMS) for the determination of carbon monoxide, nitrogen oxides and oxygen from the boiler [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91]. The CEMS shall be operated in conformance with 40 CFR, Part 60, Appendix B, Performance Specifications, and Appendix F, Quality Assurance Procedures [Regulation 1, Rule 240(d)]. Monitoring shall be conducted in accordance with 40 CFR Part 60.13 unless a more restrictive requirement is contained in the permit.
8. **Annual Relative Accuracy Test Audit (RATA)** - In order to verify compliance with emissions limits, the CEMS shall undergo an annual Relative Accuracy Test Audit (RATA) for Nitrogen Oxides and Carbon Monoxide.

**V. REPORTING AND RECORDKEEPING** - see General Provisions, section F.

- A. The permittee shall maintain data on the operation of the boiler which shall include the temperature, pressure and flow of steam production [Regulation 1, Rule 220(b) Authority to Construct dated 12/2/86 and reissued on 5/30/90 and 9/24/91].
- B. The permittee shall maintain records of opacity 6-minute averages [40 CFR 60.49b(f)].
- C. The permittee shall report all occurrences of excess emissions to the District in accordance with the timing requirements of Regulation 1, Rule 540, Equipment Breakdown [Regulation 1, Rule 240(d)].
- D. A monthly report of the daily and monthly averages of carbon monoxide, nitrogen oxides, and oxygen emissions shall be submitted to the District with the monthly monitoring report required in General Provisions section F.6.[Regulation 1, Rule 240(d)].
- E. The permittee shall maintain records of the hourly, daily and monthly averages for carbon monoxide, nitrogen oxides, and oxygen [Regulation 1, Rule 240(d)].
- F. The permittee shall maintain diesel oil fuel usage information in order to calculate the annual capacity factor [40 CFR 60.49b(d)].
- G. The permittee shall maintain a log of the nitrogen content of the diesel oil received as fuel for the boiler. Nitrogen content shall be measured using the most current ASTM method, by methods approved by the District, or as certified by the supplier [40 CFR 60.44b(k)].
- H. The permittee shall maintain a log of the amount, type of paper, date and time of any paper wastes burned in the boiler.

**VI. OPERATING CONDITIONS** - see General Provisions, section C.

- A. The boiler shall be fired only with wood wastes, diesel oil and paper wastes. Wood waste means sawmill or lumber wastes, or vegetation which are not treated with any chemicals. Painted wood is allowable provided that the paint is tested for lead. Lumber painted with lead based paints shall not be burned in the boiler. Paper wastes means newspaper, cardboard and any other paper excluding mixed paper from magazines or junk mail, or glossy paper waste. Paper waste use may not exceed 1 ton per day and must be less than 10% of the volume of the wastes burned in the boiler in a hour [Regulation 1, Rule 240(d)].
- B. The steam production from the boiler shall not exceed 150,000 pounds per hour, or in excess of 407,000 pounds per hour total for Boiler A, Boiler B and Boiler C on a monthly average basis [Regulation 1, Rule 220(b) Authority to Construct dated 1/14/87 and reissued on 4/26/89 and 9/24/91].
- C. The permittee shall continuously operate and maintain an electrostatic precipitator on the exhaust of the boiler [Regulation 1, Rule 220(b) Authority to Construct dated 1/14/87 and reissued on 4/26/89 and 9/24/91].
- D. The permittee shall not combust diesel oil with a nitrogen content greater than 0.30% by weight [40CFR 60.44b(k)].
- E. The annual capacity factor for diesel oil shall not exceed 10% for a calendar year [40 CFR 60.44b(k)]. This equates to a limitation of 1.47 million gallons of diesel oil per calendar year. The annual capacity factor for diesel oil is determined by dividing the actual heat input to the steam generating unit during the calendar year from the combustion of diesel oil, by the potential heat input to the steam generating unit if the steam generating unit had been operated for 8,760 hours at the maximum design heat input capacity [40 CFR 60.43b(e)].

(4) Permit Number: #000936-2 rev. 2

Name: Dry Lumber Kilns #1-9

## AUTHORIZED EQUIPMENT

1. This permit authorizes the installation and operation of the following equipment:

**Table 1.0 - Authorized Process Equipment**

Device S-4	Dry Lumber Kilns #1-9
SCC	30700898
Description	Nine identically-sized and designed dry lumber kilns (Kilns #1-4 situated on south side of planer building. Kilns #5-9 situated farther south).
Application	Steam-heated enclosures used to dry lumber
Maximum Exhaust Air Temperature	190° Fahrenheit
Release Point	Fugitive

2. The Permittee shall install, utilize, and maintain temperature gauges to adequately measure the operating air temperature in each kiln that comprises S-4 (Dry Lumber Kilns). [NCUAQMD Rule 102(E)]

## OPERATIONAL CONDITIONS

3. The Permittee shall only process the type of lumber listed in Table 2.0 below in S-4 (Dry Lumber Kilns). [NCUAQMD Rule 102(E)]
4. The Permittee shall not operate S-4 (Dry Lumber Kilns) in such a manner so as to exceed the production limitations listed in Table 2.0 below:

**Table 2.0 - Production Limits (Dry Lumber Kilns)**

SPECIES	ANNUAL LIMIT (MMbf)
Redwood	119.7
Douglas Fir	40.1
White Fir	1.4
Pine	1.4
TOTAL (all species)	162.6

5. The Permittee shall not allow the operating air temperature of any kiln that comprises S-4 (Dry Lumber Kilns) to exceed 190 degrees Fahrenheit, as an hourly average. [NCUAQMD Rule 102(E)]

6. The Permittee shall keep the doors to S-4 (Dry Lumber Kilns) closed during active drying operations. [NCUAQMD Rule 102(E)]
7. The Permittee shall maintain all ducting, housings, fans, chambers, and exhaust stacks in a leak-free state during all times of operation. Emissions of exhaust gases visible to the unaided human eye shall not occur at any point upstream of the final release point. [NCUAQMD Rule 102(E)]
8. The Permittee shall develop, implement, and maintain a written *Device Operational Plan* that contains specific procedures for operating the authorized equipment and measuring devices. The plan shall be consistent with the requirements of this permit, and all local, state and federal laws, rules, and regulations. The plan shall include, but not be limited to, a program for recording operational parameters, and system integrity inspections. The plan shall be submitted to the APCO within 180 days of the issue date of this permit. Modifications to the plan are subject to APCO approval and the Permittee shall not operate the authorized equipment unless an APCO-approved *Device Operational Plan* is in effect. [NCUAQMD Rule 102(E)]
9. The Permittee shall take immediate corrective action to restore compliant operation upon detection of a malfunction or breakdown condition that causes or may cause a violation of any emissions limitation, as established in this permit or in District rules. [NCUAQMD Rule 102(E)]

## RECORDKEEPING & REPORTING

10. The Permittee shall record S-4 (Dry Lumber Kilns) operational parameters as listed in Table 3.0 below. [NCUAQMD Rule 102(E)]

**Table 3.0 Recordkeeping – S-4 (Dry Lumber Kilns)**

Frequency	Information to be recorded
Upon Occurrence	A. Maintenance or repairs performed B. Equipment breakdown or malfunction C. Date, start time, and end time of each excess emission event D. Date, start time, and end time of any hourly average operating temperature reading of 190 or greater (degrees Fahrenheit)
Hourly	E. Average operating temperature of each kiln (degrees Fahrenheit)
Monthly	F. Quantity (MMbf) of Redwood lumber processed G. Quantity (MMbf) of Douglas fir lumber processed H. Quantity (MMbf) of White fir lumber processed I. Quantity (MMbf) of Pine lumber processed J. Total quantity (MMbf) of lumber processed
Annually	K. Quantity (MMbf) of Redwood lumber processed L. Quantity (MMbf) of Douglas fir lumber processed M. Quantity (MMbf) of White fir lumber processed N. Quantity (MMbf) of Pine lumber processed O. Total quantity (MMbf) of lumber processed

11. The Permittee shall continuously record the operating air temperature, in degrees Fahrenheit, of each kiln comprising S-4 (Dry Lumber Kilns). [NCUAQMD Rule 102(E)]
12. The Permittee shall continuously maintain the records required in this section for the most recent five-year period. Records shall be retained on-site, either at a central location or at the equipment's location, and shall be made immediately available to the District staff upon request. [NCUAQMD Rule 102(E)]

**(5) Permit Number: #000937-2**

**Name: Knife Planer and Gang Trimmer**

## **AUTHORIZED EQUIPMENT**

1. This permit authorizes the installation and operation of the following equipment:

**Table 1.0 - Authorized Process Equipment**

<b>Device S-5</b>	Knife Planer
Application	Wood planing
SCC	30700805
Model	#3482 Knife Planer
Board Feet Rating	100,000 BF/hr
Control Device	Cyclone 1A & 1B (C-10), Cyclone 2 (C-11)
Release Point	E-4 and E-5
<b>Device S-6</b>	Gang Trimmer
Application	Wood trimming
SCC	30700805
Model	#728 24' RH High Speed Trimmer
Board Feet Rating	100,000 BF/hr
Control Device	Cyclone 1A & 1B (C-10), Cyclone 2 (C-11)
Release Point	E-4 and E-5

2. This permit authorizes the operation of the following control equipment:

**Table 2.0 - Authorized Control Equipment**

<b>Device C-10</b>	Cyclone 1A & 1B
Stack Release Height	70 ft.
Stack Diameter	7 ft. (inner)
Stack Exhaust Temp.	Ambient
Stack Flow Rate	51,500 acfm
Stack ID	E-2
Stack Location	10 T 406.620 km E 4480.876 km N (UTM NAD83)
<b>Device C-11</b>	Cyclone 2
Stack Release Height	75 ft.
Stack Diameter	7 ft. (inner)
Stack Exhaust Temp.	Ambient
Stack Flow Rate	7,100 acfm
Stack ID	E-3
Stack Location	10 T 406.564 km E 4481.038 km N (UTM NAD83)

3. The Permittee shall maintain ducting and air movers as necessary to convey the exhaust gases from the emission devices listed in the Authorized Equipment section of this Permit to their respective control devices. [NCUAQMD Rule 102(E)]

4. The wood/chip storage bin used to store the waste material collected by C-10 and C-11 shall have skirting, or similar device installed to facilitate the clean and direct transfer of collected material to a transport vehicle. [NCUAQMD Rule 102(E)]

### OPERATIONAL CONDITIONS

5. The Permittee shall not operate the Authorized Equipment subject to this permit in such a manner so as to exceed the production limits listed in Table 3.0 below:

**Table 3.0 - Production Limits**

DEVICE	UNITS	ANNUAL LIMIT
S-5 (Knife Planer)	Hours	4,160
S-6 (Gang Trimmer)	Hours	4,160

6. The Permittee shall maintain all ducting, housings, fans, chambers, exhaust stacks, and waste transfer and collection points in a leak-free state during all times of operation. Emissions of exhaust gases visible to the unaided human eye shall not occur at any point upstream of the final release point (stack). [NCUAQMD Rule 102(E)]
7. The Permittee shall operate the Authorized Equipment and Control Devices such that:
- All leaks of exhaust gas upstream of the final discharge point shall be repaired immediately.
  - Wood particles deposited on the roof of any building, on the ground, or elsewhere, shall be removed or controlled immediately, in accordance with an APCO-approved *Facility Dust Mitigation and Housekeeping Plan*.
8. The Permittee shall take immediate corrective action to restore compliant operation upon detection of a malfunction or breakdown condition that causes or may cause a violation of any emissions limitation, as established in this permit or in District rules. [NCUAQMD Rule 102(E)]

## EMISSION LIMITATIONS

9. The Permittee shall not discharge pollutants into the atmosphere from Cyclone 1A & 1B (E-4) in excess of the following limits in Table 4.0 below. [NCUAQMD Rule 102(E)]

**Table 4.0 – E-4 (Cyclone 1A & 1B) Emission Limits**

Pollutant	Emission Rate	
	lbs/hr	tons/yr
PM <sub>10</sub>	6.6	13.8
PM <sub>2.5</sub>	6.6	13.8

10. The Permittee shall not discharge pollutants into the atmosphere from Cyclone 2 (E-5) in excess of the following limits in Table 4.1 below. [NCUAQMD Rule 102(E)]

**Table 4.1 - E-5 (Cyclone 2) Emission Limits**

Pollutant	Emission Rate	
	lbs/hr	tons/yr
PM <sub>10</sub>	0.9	1.9
PM <sub>2.5</sub>	0.9	1.9

11. The Permittee shall not operate the Authorized Process Equipment S-5 and S-6 such that the exhaust gas discharged from E-2 or E-3 is in excess of 20% opacity, or as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, calculated as a six-minute average. [NCUAQMD Rule 104(B)(3)]
12. The Permittee shall not operate the Authorized Process Equipment S-5 and S-6 such that particulate matter is discharged from E-2 or E-3 is in excess of 0.015 grains per actual cubic foot of exhaust gas. [NCUAQMD Rule 102(E)]

## COMPLIANCE TESTING & MONITORING

13. The Permittee shall demonstrate compliance with the emission limits identified in this permit using the following methods, no less than once every three years after the initial performance test (June 19, 2012). If reported values for a pollutant are less than 50% of the permitted limits, the APCO may waive further compliance testing requirements for that pollutant. The Permittee shall cause an independent party which is CARB certified to conduct the source tests. All compliance tests shall be conducted at an operating capacity of 95% or greater of the permitted production capacity as stated in this permit, or under conditions determined by the APCO to most challenge the emission control equipment. Alternative testing procedures may be used if advance approval is obtained from the APCO.
- Particulate Matter - Oregon DEQ Method 8, and
  - Visible Emissions – EPA Reference Method 9. Permittee shall perform a “Visible Emission Evaluation” (VEE) concurrent with particulate matter testing.



14. The Permittee shall provide written notification to the District identifying the date the Authorized Equipment is to undergo testing for purposes of satisfying provisions of this Permit. Notification shall be made no later than 60 days prior to testing and shall include a compliance testing plan. The plan shall be subject to APCO review and approval. Testing conducted without an APCO-approved plan may be considered invalid or inadequate for compliance purposes. *[NCUAQMD Rule 102(E)]*
15. Source test results shall be summarized in a written report and submitted to the District directly from the independent source testing firm on the same day, the same time, and in the same manner as submitted to Permittee, no later than 60 days after the testing is completed. *[NCUAQMD Rule 102(E)]*

## **RECORDKEEPING & REPORTING**

16. The Permittee shall record the operational parameters for the Authorized Equipment as listed in Table 5.0 below.

**Table 5.0 – Recordkeeping (Knife Planer and Gang Trimmer)**

Frequency	Information to be recorded for each unit
Upon Occurrence	A. Maintenance or repairs performed B. Equipment breakdown or malfunction C. Excessive emission events
Weekly	D. Equipment condition
Monthly	E. Hours of operation
Annually	F. Hours of operation

17. The Permittee shall conduct weekly inspections of the Authorized Process Equipment, Authorized Control Equipment, ducting, and air movers, and shall record the condition of each, as indicated in Table 5.0 Recordkeeping. Inspections shall be conducted if the Authorized Process Equipment is in operation for any amount of time during the reporting period. *[NCUAQMD Rule 102(E)]*
18. The Permittee shall continuously maintain the records required in this section for the most recent five-year period. Records shall be retained on-site, either at a central location or at the equipment's location, and shall be made immediately available to the District staff upon request. *[NCUAQMD Rule 102(E)]*

**(6) Permit Number: #000938-2**

**Name: Emergency Compression Ignition Engine**

### **AUTHORIZED EQUIPMENT**

1. This permit authorizes the installation and operation of the following equipment:

**Table 1.0 - Authorized Process Equipment**

<b>Device S-7</b>	Emergency Standby Diesel CI Engine
<b>Application</b>	Standby Generator
<b>SCC</b>	20200102
<b>Generator Model</b>	Baldor UCI274F
<b>Engine Model</b>	John Deere 6068HF150
<b>Engine Family</b>	2JDXL06.8012 (Tier 1)
<b>Size</b>	251 Hp (187 kW) Standby @ 1800 rpm
<b>Year</b>	2002
<b>Serial Number</b>	PE6068H311023 (engine) / 0164876/15 (generator)
<b>Heat Input Rate</b>	1.7 MMBtu/hr (12.0 gal/hr)
<b>Release Point</b>	E-6
<b>Stack Location</b>	10 T 406.438 km E 4481.975 km N (UTM NAD83)

2. The Permittee shall utilize and maintain a non-resettable hour meter with a minimum display capability of 9,999 hours upon S-7 (Emergency Standby Diesel CI Engine). [17 CCR §93115.10(d) effective May 19, 2011]

### **OPERATIONAL CONDITIONS**

3. The Permittee shall only operate S-7 (Emergency Standby Diesel CI Engine) using one of the following fuels:
- CARB Diesel Fuel, or
  - An alternative diesel fuel that meets the requirements of the Verification Procedure (as codified in CCR Title 13 Sections 2700-2710), or
  - CARB Diesel Fuel used with fuel additives that meets the requirements of the Verification Procedure (as codified in CCR Title 13 Sections 2700-2710), or
  - Any combination of a) through c) above.

4. S-7 (Emergency Standby Diesel CI Engine) is authorized the following maximum allowable annual hours of operation as listed in Table 2.0 below: [17 CCR §93115 effective May 19, 2011]

**Table 2.0 - Hours of Operation for S-7 (Emergency CI Engine)**

Emergency Use	Non-Emergency Use	
	Emission Testing to show compliance	Maintenance & Testing
Not Limited by the ATCM	Not Limited by the ATCM	30 hours/year

5. The Permittee shall only operate S-7 (Emergency Standby Diesel CI Engine) in accordance with the most recent amendment of Title 17, California Code of Regulations section 93115.6(a)(3)(A), ATCM for Stationary CI Engines.
6. The Permittee shall maintain all ducting, housings, fans, chambers, and exhaust stacks in a leak-free state during all times of operation. Emissions of exhaust gases visible to the unaided human eye shall not occur at any point upstream of the final release point (stack).
7. The Permittee shall take immediate corrective action to restore compliant operation upon detection of a malfunction or breakdown condition that causes or may cause a violation of any emissions limitation, as established in this permit or in District rules. [NCUAQMD Rule 102(E)]

## EMISSION LIMITATIONS

8. The Permittee shall not discharge pollutants into the atmosphere from S-7 (Emergency Standby Diesel CI Engine) at rates in excess of the performance standards as listed in Table 3.0 below. [17 CCR §93115.10(d) effective May 19, 2011]

**Table 3.0 - S-7 (Emergency CI Engine) Performance Standards**

Pollutant	Performance Standards
	g/bhp-hr
PM	0.40
CO	8.5
NOx	6.9
HC	1.0

9. The Permittee shall not discharge pollutants into the atmosphere from release point E-6 (Diesel CI Engine Stack) in excess of the following limits in Table 4.0 below. Emissions generated during an emergency event or during emission testing for compliance purposes shall not contribute towards the hourly or annual emission limits. [NCUAQMD Rule 102(E)]

**Table 4.0 – E-6 (Diesel CI Engine Stack) Emission Limits**

Pollutant	Emission Rate	
	lb/hr	tons/year
PM <sub>10</sub>	0.22	3.32E-03
PM <sub>2.5</sub>	0.22	3.32E-03
NO <sub>x</sub>	3.82	5.73E-02
VOC	0.55	8.30E-03
CO	4.70	7.06E-02
SO <sub>x</sub>	0.0013	1.90E-05
CO <sub>2</sub> E	-	4.1

10. The Permittee shall not operate S-7 (Emergency Standby Diesel CI Engine) such that any air contaminant is discharged in excess of 20% opacity, or as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, calculated as a six-minute average. [NCUAQMD Rule 104(B)(3)]
11. The Permittee shall not discharge particulate matter into the atmosphere from release point E-6 (Diesel CI Engine Stack) in excess of 0.20 grains per cubic foot of dry gas calculated to 12% CO<sub>2</sub> at standard conditions. [NCUAQMD Rule 104(C)(1)]

## **COMPLIANCE TESTING & MONITORING**

12. The Permittee shall have the visible emissions from the Emergency Diesel CI Engine determined using EPA Reference Method 9 (Visible Emissions Evaluation) for opacity of exhaust gases within thirty (30) days after being directed by the APCO. [NCUAQMD Rule 102(E)]
13. The Permittee shall determine emission rates from S-7 (Emergency Standby Diesel CI Engine) using the test methods listed in 17 CCR §93115.14(a) within 30 days after being directed by the APCO. [NCUAQMD Rule 102(E)]

## RECORDKEEPING & REPORTING

16. The Permittee shall record S-7 (Emergency Standby Diesel CI Engine) operational parameters as listed in Table 5.0 below. [17 CCR §93115.10(g) effective May 19, 2011]

**Table 5.0 Recordkeeping – S-7 (Emergency CI Engine)**

Frequency	Information to be recorded
Upon Occurrence	A. Maintenance or repairs performed B. Equipment breakdown or malfunction C. Excessive emission events
Monthly	D. Emergency hours of operation E. Maintenance and testing hours of operation F. Emission testing hours of operation G. Quantity (gallons) of CARB Diesel combusted
Annually	H. Emergency hours of operation I. Maintenance and testing hours of operation J. Emission testing hours of operation K. Quantity (gallons) of CARB Diesel combusted

17. The permittee shall document the use of CARB Diesel through the retention of fuel purchase records indicating that the only fuel purchased for supply to S-7 (Emergency Standby Diesel CI Engine) was CARB Diesel. [NCUAQMD Rule 102(E)]
18. The Permittee shall retain records required by this section for a minimum of 36 months. Records shall be retained on-site, either at a central location or at the engine's location, and shall be made immediately available to the District staff upon request. [NCUAQMD Rule 102(E)]

**(7) Permit Number: #000973-2**

**Name: Natural Gas Boiler**

## **AUTHORIZED EQUIPMENT**

1. This permit authorizes the installation and operation of the following equipment:

**Table 1.0 - Authorized Process Equipment**

<b>Device S-8</b>	<b>External Combustion Boiler – Steam Generation</b>
<b>SCC</b>	10200602
<b>Application</b>	Generation of low-pressure steam to dry lumber in S-4 (Dry Lumber Kilns)
<b>Boiler Manufacturer</b>	Superior Boiler Works X6-S200-3000
<b>Burner Model</b>	Johnson NM-600-A
<b>Input Rating</b>	25.2 MMBtu/hr
<b>Output Rating</b>	20.7 KPPH Steam
<b>Fuel Type</b>	Natural Gas
<b>Release Point</b>	E-7 (Natural Gas Boiler Stack)

2. The Permittee shall vent Release Point E-7 vertically upward, which shall not be impeded by a rain cap or any other similar device that would impede vertical exhaust flow. [NCUAQMD Rule 102(E)]
3. The Permittee shall utilize and properly maintain a non-resettable totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted by S-8 (Natural Gas Boiler). [NCUAQMD Rule 102(E)]

## **OPERATIONAL CONDITIONS**

4. The Permittee shall only combust pipeline quality Natural Gas in S-8 (Natural Gas Boiler).
5. The Permittee shall not operate S-8 (Natural Gas Boiler) in such a manner so as to exceed the lesser of the following:
- The maximum capacity, rating, or design specification of the unit as identified in the Authorized Equipment Section of this permit;
  - The operational limitations specified in Table 2.0; or
  - One hundred and ten percent (110%) of the production rate at which the Authorized Equipment was operated during the most recent performance test in which compliance with all the conditions of this permit was demonstrated.

**Table 2.0 Operational Limits**

<b>Units</b>	<b>HOURLY LIMIT</b>
MMBtu	16.8 (monthly average)

6. The Permittee shall minimize S-8 (Natural Gas Boiler) startup and shutdown periods and conduct startups and shutdowns according to the manufacturer's recommended procedures. [NCUAQMD Rule 102(E)]
7. The Permittee shall maintain all ducting, housings, fans, chambers, exhaust stacks, and waste transfer and collection points in a leak-free state during all times of operation. Emissions of exhaust gases visible to the unaided human eye shall not occur at any point upstream of the final release point (stack).
8. The Permittee shall take immediate corrective action to restore compliant operation upon detection of a malfunction or breakdown condition that causes or may cause a violation of any emissions limitation, as established in this permit or in District rules. [NCUAQMD Rule 102(E)]

### EMISSION LIMITATIONS

9. The Permittee shall not discharge pollutants into the atmosphere from release point E-7 (Natural Gas Boiler Stack) in excess of the following limits in Table 3.0 below.

**Table 3.0 – Release Point E-7 (Main Stack) Emission Limits**

Pollutant	Emission Rate	
	lb/hr	tons/year
PM <sub>10</sub>	0.19	0.82
PM <sub>2.5</sub>	0.19	0.82
NO <sub>x</sub>	1.23	5.38
VOC	0.14	0.59
CO	2.06	9.04
SO <sub>x</sub>	0.01	0.06
CO <sub>2</sub> E	-	12,597

10. The Permittee shall not discharge particulate matter into the atmosphere from release point E-7 (Natural Gas Boiler Stack) in excess of 0.1 grains per standard cubic foot of exhaust gas, calculated to 12% carbon dioxide. [NCUAQMD Rule 104(C)(2)]
11. The Permittee shall not operate S-8 (Natural Gas Boiler) such that any air contaminant is discharged in excess of 20% opacity, or as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, calculated as a six-minute average. [NCUAQMD Rule 104(B)(3)]

## COMPLIANCE TESTING & MONITORING

12. The Permittee shall demonstrate compliance with the S-8 (Natural Gas Boiler) emission limits identified in this permit using the following methods, in the manner directed by the APCO, within 60 days after being so directed. [NCUAQMD Rule 102(E)]
  - a. NO<sub>x</sub>, CO – CARB Method 100
13. All compliance tests shall be conducted at 90% or greater of the maximum capacity, rating, or design specification of the unit as identified in the Authorized Equipment Section of this permit, or under conditions determined by the APCO to most challenge the emission control equipment. The Permittee may request that the equipment be tested under alternate parameters (e.g. different flow rate, production rate, feed rate). Any such request shall be submitted in writing and shall be fully described within the source testing protocol submitted pursuant to this permit. Testing using alternate parameters may result in modifications to operational limits as determined by the APCO.
14. The Permittee shall provide written notification to the District identifying the date the Authorized Equipment is to undergo testing for purposes of satisfying provisions of this Permit. Notification shall be made no later than 30 days prior to testing and shall include a compliance testing plan. The plan shall be subject to APCO review and approval. Testing conducted without an APCO-approved plan may be considered invalid or inadequate for compliance purposes. [NCUAQMD Rule 102(E)]
15. Source test results shall be summarized in a written report and submitted to the District directly from the independent source testing firm on the same day, the same time, and in the same manner as submitted to Permittee, no later than 60 days after the testing is completed. [NCUAQMD Rule 102(E)]
16. The Permittee shall conduct a tune-up of S-8 (Natural Gas Boiler), in a manner equivalent to 40 CFR §63.11223(b)(1)-(6), no later than June 21, 2017, and every two years thereafter. Each 2-year tune-up must be conducted no more than 25 months after the previous tune-up. [NCUAQMD Rule 102(E)]



## RECORDKEEPING & REPORTING

17. The Permittee shall record S-8 (Natural Gas Boiler) operational parameters as listed in Table 4.0 below. [NCUAQMD Rule 102(E)]

**Table 4.0 Recordkeeping (Natural Gas Boiler)**

Frequency	Information to be recorded
Upon Occurrence	A. Maintenance, repairs, or tune-ups performed B. Equipment breakdown or malfunction C. Excessive emission events D. Incident and duration of S-8 (Natural Gas Boiler) startup and shutdown events (hrs/event)
Monthly	E. Hours of operation F. Quantity of Natural Gas (MMCF) combusted in S-8 (Natural Gas Boiler) G. Average Natural Gas combustion rate (MMCF/hr)
Annually	H. Hours of operation I. Quantity of Natural Gas (MMCF) combusted in S-8 (Natural Gas Boiler)

14. The Permittee shall report to the NCUAQMD any malfunction or breakdown condition as soon as reasonably possible, but no later than one hour after its detection during normal office hours (9:00 a.m. to 4:00 p.m.), or one hour after the start of the next regular business day, whichever is sooner. [NCUAQMD Rule 105 §5.2.1.1]
15. The Permittee shall report to the NCUAQMD any deviations from the requirements of this permit, including those attributable to malfunction or breakdown conditions, the probable cause of the deviations, and any corrective actions or preventive measures taken. Within 10 days after occurrence, the Permittee shall submit a written report to the NCUAQMD which includes the following information regarding the event: [NCUAQMD Rule 105 §5.0]
- Duration of excessive emissions,
  - Estimation of the quantity of emissions,
  - Statement of the cause of the occurrence, and
  - Corrective measures taken to prevent recurrences.
16. The Permittee shall keep records to document the date of each tune-up performed pursuant to this permit, the procedures followed for tune-up, and the manufacturer's specifications to which S-8 (Natural Gas Boiler) was tuned. [NCUAQMD Rule 102(E)]
17. The Permittee shall continuously maintain the records required in this section for the most recent five-year period. Records shall be retained on-site, either at a central location or at the equipment's location, and shall be made immediately available to the District staff upon request. [NCUAQMD Rule 102(E)]

**(8) Permit Number: #000974-2**

**Name: Hot Mix Asphalt Plant**

## AUTHORIZED EQUIPMENT

1. This permit authorizes the installation and operation of the following equipment:

**Table 1.0 - Authorized Process Equipment**

<b>Device S-9</b> SCC Description Application Release Point	<b>Cold Aggregate Feed Bins</b> 30500216 Four 8' x 8' cold aggregate feed bins and associated gathering conveyor. Storage and transfer of aggregate materials to S-10 Fugitive
<b>Device S-10</b> SCC Description Application Release Point	<b>Cold Aggregate Feed Conveyor</b> 30500217 18" wide x 50' long inclined feed conveyor. Screening and transfer of aggregate materials to S-11A Fugitive
<b>Device S-11A</b> SCC Description Application Capacity Release Point	<b>Single-Deck Screen and Pug Mill</b> 305800231 2.5' x 5' single-deck scalping screen and single-shaft pug mill rated at 150 tons/hr Screening of cold aggregate and mixing 150 tons/hr Fugitive
<b>Device S-11B</b> SCC Description Application Capacity Aggregate Dryer Make/Model Burner Rating Primary Fuel Type Control Device Release Point	<b>Drum Mix Plant: Rotary Drum Dryer / Mixer, Oil-Fired, Parallel Flow</b> 30500259 Rotary drum aggregate dryer / mixer (parallel flow) with drag flight conveyor rated at 150 tons/hr Drying of aggregate, mixing of aggregate with liquid asphalt, and transfer of hot mix asphalt to S-3C 100 tons/hr finished hot mix asphalt Astec PFM-305  41.0 MMBtu/hr Diesel Oil C-12 (Baghouse) E-8

<b>Device S-11C</b>	<b>Storage Silo</b>
SCC	30500213
Description	30 ton hot mix asphalt surge bin with discharge gate
Application	Storage, transfer of finished hot mix asphalt to S-5C
Capacity	200 tons hot mix asphalt
Release Point	Fugitive
<b>Device S-11D</b>	<b>Truck Load-Out</b>
SCC	30500214
Application	Discharge of hot mix asphalt to transit truck
Release Point	Fugitive
<b>Device S-12</b>	<b>Heated Asphalt Storage Tank: Drum Mix</b>
SCC	30500212
Description	Asphalt storage tank
Application	Storage of liquid asphalt
Capacity	12,000 gallons
Burner Rating	0.5 MMBtu/hr
Release Point	E-9
<b>Device S-13</b>	<b>Heated Asphalt Storage Tank: Drum Mix</b>
SCC	30500212
Description	Asphalt storage tank; additional capacity for S-12
Application	Storage of liquid asphalt
Capacity	20,000 gallons (two 10,000 gallon compartments)
Burner Rating	n/a
Release Point	E-10

**Table 2.0 - Authorized Control Equipment**

<b>Device C-12</b>	<b>Baghouse</b>
Make/Model	Astec PPJ-20AC
Exhaust Flow Rate	20,000 cfm
Filter Type	Bag (acid-resistant Aramid felt, or equivalent)
Filter Dimensions	Diameter: 4 5/8" / Length: 8'
Cloth Filter Area	3,408 sq. ft. @ 5.9:1 air/cloth ratio
Method of Cleaning	Pulse jet
Pressure Drop	To be determined
Pollutants Controlled	PM
Emissions Device	S-11B (Rotary Drum Dryer/Mixer)
Controlled	
<b>Release Point</b>	<b>E-8</b>
Stack Location	To be determined

- The Permittee shall vent Release Point E-8 vertically upward, which shall not be impeded by a rain cap or any other similar device that would impede vertical exhaust flow. [NCUAQMD Rule 102(E)]

3. The Permittee shall equip C-12 (Baghouse) with a pressure differential gauge to indicate the pressure drop across the control device. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [NCUAQMD Rule 102(E)]
4. The Permittee shall install, utilize, and properly maintain a non-resettable totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted by S-11B (Rotary Drum Dryer/Mixer). [NCUAQMD Rule 102(E)]
5. The Permittee shall install, utilize, and properly maintain a non-resettable totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted by S-12 (Heated Asphalt Storage Tank). [NCUAQMD Rule 102(E)]
6. The Permittee shall install, utilize, and properly maintain a temperature gauge on the outlet of S-11B (Rotary Drum Dryer/Mixer) to measure the temperature of the finished hot mix asphalt. [NCUAQMD Rule 102(E)]

## OPERATIONAL CONDITIONS

7. The Permittee shall not operate the Authorized Equipment subject to this Permit in such a manner so as to exceed the lesser of the following:
  - a. The maximum capacity, rating, or design specification of the unit as identified in the Authorized Equipment Section of this permit;
  - b. The operational limitations specified in Table 3.0; or
  - c. One hundred and ten percent (110%) of the production rate at which the plant was operated during the most recent performance test where the plant demonstrated compliance with all the conditions of this permit.

**Table 3.0 Operational Limits**

UNITS	LIMIT		
	Hour	Day	Year
Tons Hot Mix Asphalt Produced	150	1,200	54,000

8. The Permittee shall only fire the Authorized Equipment subject to this Permit using one of the following fuels:
  - a. CARB Diesel Fuel, or
  - b. An alternative diesel fuel that meets the requirements of the Verification Procedure (as codified in CCR Title 13 Sections 2700-2710), or
  - c. CARB Diesel Fuel used with fuel additives that meet the requirements of the Verification Procedure (as codified in CCR Title 13 Sections 2700-2710), or
  - d. Any combination of a) through d) above. [NCUAQMD Rule 102(E)]
9. The Permittee shall not allow the finished asphalt hot mix temperature to exceed 325 degrees Fahrenheit at the outlet of S-11B (Rotary Drum Dryer/Mixer). [NCUAQMD Rule 102(E)]

10. Prior to being discharged into the atmosphere, the Permittee shall direct the exhaust gases created from operation of the Authorized Process Equipment through the Authorized Control Equipment identified in Tables 1.0 and 2.0 of this permit.
11. The Permittee shall operate C-1 (Baghouse) such that while S-11B (Rotary Drum Dryer/Mixer) is in operation, including startup and shutdown events, the differential pressure drop across C-1 shall be no greater than 11.0 inches WC and no less than 2.0 inches WC. [NCUAQMD Rule 102(E)]
12. The Permittee shall remove and dispose of material from C-12 (Baghouse) in a manner preventing entrainment into the atmosphere. [NCUAQMD Rule 102(E)]
13. The Permittee shall adjust the cleaning frequency and duration of C-12 (Baghouse) to optimize control efficiency. [NCUAQMD Rule 102(E)]
14. The Permittee shall minimize S-11B (Rotary Drum Dryer/Mixer) startup and shutdown periods and conduct startups and shutdowns according to the manufacturer's recommended procedures. [NCUAQMD Rule 102(E)]
15. The Permittee shall maintain all ducting, housings, fans, chambers, exhaust stacks, and waste transfer and collection points in a leak-free state during all times of operation. Emissions of exhaust gases visible to the unaided human eye shall not occur at any point upstream of the final release point (stack).
16. The Permittee shall exercise best management practices in the control of fugitive dust and accordingly shall implement the following conditions: [NCUAQMD Rule 104(D)]
  - a. Prior to any loading of materials, the material loaded shall be adequately wetted.
  - b. Exposed areas, inactive stockpiles, or quarried materials that are prone to mechanical or wind disturbances shall be adequately wetted, or controlled using 1) dust palliatives or suppressants, 2) paving, 3) wind berms or breaks; or 4) covered with tarps or other material.
  - c. All unpaved areas including access and haul roads, parking lots, and staging areas, or access roads shall be stabilized using one or more of the following measures: 1) dust palliatives or suppressants, 2) paving, 3) wind berms or breaks; or 4) covered with tarps or other material.
  - d. The speed of any vehicles at the plant site and on access and haul roads shall not exceed fifteen (15) miles per hour. This speed shall be posted on all access and haul roads. For the purposes of this permit, "plant site" means the area that includes all emission units and activities which may produce air contaminants, all stockpiles, staging areas, parking lots and all access and haul roads.
17. The Permittee shall minimize track-out onto paved public roadways by cleaning any visible track-out, using high powered water wash, wet sweeping, or a HEPA filter equipped vacuum device, as needed to prevent a public nuisance. [NCUAQMD Rule 102(E)]
18. The Permittee shall take immediate corrective action to restore compliant operation upon detection of a malfunction or breakdown condition that causes or may cause a violation of any emissions limitation, as established in this permit or in District rules. [NCUAQMD Rule 102(E)]

19. The Permittee shall implement, and maintain a written Startup, Shutdown, and Malfunction Plan as described in 40 CFR Part 63.6(e)(3), that contains specific procedures for maintaining the authorized equipment, associated control devices, sensors, measuring devices, during periods of startup, shutdown, and malfunction. The plan must clearly describe the startup and shutdown sequence procedure for each unit. The plan shall also include a specific program of corrective actions to be implemented in the event of a malfunction in either the process or control systems. The plan shall be submitted to the APCO at least 60 days prior to initial startup. Modifications to the plan are subject to APCO approval and the Permittee shall not operate the authorized equipment and their associated control devices unless an APCO-approved Startup, Shutdown, and Malfunction Plan is in effect.
20. The Permittee shall implement, and maintain a written Device Operational Plan that contains specific procedures for operating the authorized equipment, associated control devices, sensors, and measuring devices. The plan shall be consistent with the requirements of this permit, and all local, state and federal laws, rules, and regulations. The plan shall include, but not be limited to, daily system integrity inspections and the recording of operational parameters. The plan shall be submitted to the APCO at least 60 days prior to initial startup. Modifications to the plan are subject to APCO approval and the Permittee shall not operate the authorized equipment and their associated control devices unless an APCO-approved Device Operational Plan is in effect.
21. The Permittee shall implement, and maintain a written Device Maintenance & Replacement Plan that contains specific procedures for equipment maintenance and identifies replacement intervals for components of the authorized equipment, associated control devices, sensors, and measuring devices. The plan shall be submitted to the APCO at least 60 days prior to initial startup. The plan is subject to APCO approval. Modifications to the plan are subject to APCO approval and the Permittee shall not operate the authorized equipment and their associated control devices unless an APCO-approved Device Maintenance & Replacement Plan is in effect.

## **EMISSION LIMITATIONS**

22. The Permittee shall not discharge pollutants into the atmosphere from release point E-8 in excess of the following limits in Table 4.0 below.

**Table 4.0 – Release Point E-8 Emission Limits**

Pollutant	Emission Rate		
	lbs/hr	lbs/day	tons/year
PM10	6.9	79.9	0.4
PM2.5	6.9	49.9	0.4
NOx	8.3	49.9	1.5
VOC	4.8	49.9	0.9
CO	19.5	499.9	3.5
SOx	2.1	79.9	0.4

23. The Permittee shall not discharge PM into the atmosphere from release point E-8 in excess of 0.04 grain/dscf. [40 CFR §60.92(a)(1)]
24. The Permittee shall not discharge NO<sub>x</sub> (oxides of nitrogen) into the atmosphere from release point E-1 (Main Stack) in excess of 0.041 lbs/ ton of asphalt mix produced.
25. The Permittee shall not operate the Authorized Emission Devices such that visible emissions from the exhaust stacks of the Authorized Control Devices exceed 20% opacity for a period or periods aggregating more than three minutes in any one hour. [NCUAQMD Rule 104(B)(3) and 40 CFR §60.92(a)(2)]

## **COMPLIANCE TESTING & MONITORING**

26. The Permittee shall conduct source testing to demonstrate compliance with the particulate matter (PM) emissions concentration limit (grains/dscf), PM emission rate limit (lb/hr), and the visible emission (% opacity) limits of this Permit. Testing shall be conducted at intervals of at least once every three (3) years beginning on the day after the last source test was completed. The APCO may extend the testing date deadline up to an additional sixty (60) days for good cause. [NCUAQMD Rule 102(E)]
27. The Permittee shall demonstrate compliance with the E-1 (Main Stack) emission limits identified in this permit using the following methods. The Permittee shall cause an independent party that is CARB certified to conduct the source tests. Alternative testing procedures may be used if advance approval is obtained from the APCO. [NCUAQMD Rule 102(E)]
- a. PM – CARB Method 5 or equivalent EPA method.
  - b. Visible Emissions – EPA Method 9. Permittee shall perform a “Visible Emission Evaluation” (VEE) concurrent with particulate matter testing.
28. All compliance tests shall be conducted at 90% or greater of the maximum capacity, rating, or design specification of the unit as identified in the Authorized Equipment Section of this permit, or under conditions determined by the APCO to most challenge the emission control equipment. The Permittee may request that the equipment be tested under alternate parameters (e.g. different flow rate, production rate, feed rate). Any such request shall be submitted in writing and shall be fully described within the source testing protocol submitted pursuant to this permit. Testing using alternate parameters may result in modifications to operational limits as determined by the APCO.
29. The Permittee shall provide written notification to the District identifying the date the Authorized Equipment is to undergo testing for purposes of satisfying provisions of this Permit. Notification shall be made no later than 30 days prior to testing and shall include a compliance testing plan. The plan shall be subject to APCO review and approval. Testing conducted without an APCO-approved plan may be considered invalid or inadequate for compliance purposes. [NCUAQMD Rule 102(E)]
30. Source test results shall be summarized in a written report and submitted to the District directly from the independent source testing firm on the same day, the same time, and in the same



manner as submitted to Permittee, no later than 60 days after the testing is completed. [NCUAQMD Rule 102(E)]

31. The Permittee shall conduct a tune-up of S-11B (Rotary Drum Dryer/Mixer), in a manner equivalent to CFR §63.11223(b)(1)-(6) no later than August 21, 2018, and every two (2) years thereafter. Each 2-year tune-up must be conducted no more than 25 months after the previous tune-up.

## RECORDKEEPING & REPORTING

32. The Permittee shall record operational parameters as listed in Table 5.0 below. [NCUAQMD Rule 102(E)]

**Table 5.0 Recordkeeping**

Frequency	Information to be recorded
Upon Occurrence	A. Maintenance or repairs performed B. Equipment breakdown or malfunction C. Excessive emission events D. Testing & Tuning of the Rotary Drum Dryer Burner
Hourly	E. Weight (tons) of asphalt produced F. Pressure drop (inches WC) across baghouse
Daily	G. Weight (tons) of asphalt produced H. Quantity (gallons) of CARB Diesel combusted – consumption of each unit reported separately I. Hours of operation
Monthly	J. Weight (tons) of asphalt produced K. Quantity (gallons) of CARB Diesel combusted L. Hours of operation
Annually	L. Weight (tons) of asphalt produced M. Quantity (gallons) of CARB Diesel combusted N. Hours of operation

33. The Permittee shall continuously record the temperature, in degrees Fahrenheit, of the finished asphalt hot mix temperature at the outlet of S-11B (Rotary Drum Dryer/Mixer).
34. The Permittee shall report to the NCUAQMD any malfunction or breakdown condition as soon as reasonably possible, but no later than one hour after its detection during normal office hours (9:00 a.m. to 4:00 p.m.), or one hour after the start of the next regular business day, whichever is sooner. [NCUAQMD Rule 105(D)(2)(a)(i)]
35. The Permittee shall report to the NCUAQMD any deviations from the requirements of this permit, including those attributable to malfunction or breakdown conditions, the probable cause



of the deviations, and any corrective actions or preventive measures taken. Within 10 days after occurrence, the Permittee shall submit a written report to the NCUAQMD which includes the following information regarding the event: [NCUAQMD Rule 105(D)]

- a. Duration of excessive emissions,
- b. Estimation of the quantity of emissions,
- c. Statement of the cause of the occurrence, and
- d. Corrective measures taken to prevent recurrences.

36. The Permittee shall continuously maintain the records required in this section for the most recent five-year period. Records shall be retained on-site, either at a central location or at the equipment's location, and shall be made immediately available to the District staff upon request. [NCUAQMD Rule 102(E)]

## **B. Exempt Equipment**

Equipment and operations not specifically identified in this permit are not subject to specific federally-enforceable operating conditions or emission limitations. Such equipment and operations are subject to applicable General Provisions of this permit.

## GENERAL PROVISIONS

These general provisions apply to all facilities or sources owned or operated by the permittee as detailed in this permit.

- A. Fee Payment** - The Permittee shall pay an annual permit fee and other fees as required in accordance with Regulation 1, Rule 300 of the District. Failure to pay these fees will result in forfeiture of this Permit to Operate. Operation without a permit subjects the source to potential enforcement action by the District and the US EPA pursuant to section 502(a) of the Clean Air Act as amended in 1990[40 CFR 70.6(a)(7); Regulation 5, Rule 670].
- B. Inspection and Entry** - Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the District, CARB, EPA or an authorized representative to perform the following:
1. Enter upon the permittee's premises where a regulated facility or emissions-related activity is located or conducted, or where records must be kept under the conditions of this permit.
  2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
  3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the conditions of this permit. [40 CFR 70.6(c)(2); Regulation 5, Rule 610(e)]
- C. Facilities Operation**
1. Operation under this permit must be conducted in compliance with all data and specifications included in the application which attest to the operator's ability to comply with District Rules and Regulations [Regulation 1, Rule 240(d)].
  2. All nonexempt equipment of this permit shall at all times be maintained in good working order and be operated as efficiently as possible to assure compliance with all applicable emission limits [Regulation 1, Rule 240(d)].
  3. Operational Limit - This permit is valid for a maximum of 365 days per year at 24 hours per day [Regulation 1, Rule 240(d)].
- D. Compliance**
1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Clean Air Act and is grounds for enforcement action(including monetary civil penalties); for permit termination, revocation and reissuance, or modification; or for denial of an application for reissuance of the permit[40 CFR 70.6(a)(6); Regulation 5, Rule 610(g)].
  2. The need to halt or reduce activity is not a defense. It shall not be a defense for a permittee in an enforcement action that it would be necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [40 CFR 70.6(a)(6); Regulation 5, Rule 610(g)].
  3. A pending permit action or notification of anticipated noncompliance does not stay any permit condition[Regulation 5, Rule 610(g)(5)].
  4. The permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by this permit[40 CFR 70.6(a)(6)].

5. The permittee shall provide to the District on an annual basis a completed "Compliance Certification" form which certifies the compliance status of the facility, and on a semi-annual basis a monitoring certification form which provides certification of the monthly monitoring reports. The compliance certification and monitoring certification forms must be signed by a responsible company official and contain a statement that the information contained in the report is true, accurate, and complete. A semi-annual compliance certification report shall be submitted to document the compliance schedule of any source out of compliance[40 CFR 70.6(c); Regulation 5, Rules 460 and 610(g)].

6. Emergency events which occur at the permittee's plant which affect compliance with the terms of this permit must be reported to the District in accordance with Regulation 1, Rule 540. Emergency events are normally outside influences over which the permittee has no control[Regulation 5, Rule 460].

**E. Severability** - If any term or condition of this permit shall for any reason be adjudged by a court of competent jurisdiction to be invalid, such judgment shall not affect or invalidate the remainder of this permit[40 CFR 70.6(a)(5); Regulation 5, Rule 610(h)].

#### **F. Recordkeeping and Reporting**

1. The permittee shall retain records of all required monitoring data and support information including the date, place, time and results of any sampling or analysis, the operating conditions at the time of sampling for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and copies of all reports required by this permit[40 CFR 70.6(a)(3)(ii)(B); Regulation 5, Rule 455].

2. The permittee shall report to the District any deviations from these permit requirements, including those attributable to breakdown conditions, the probable cause of the deviations, and any corrective actions or preventive measures taken. Procedures of Regulation 1, Rule 540 shall be followed in the reporting of such deviations. A breakdown log shall be maintained for recordkeeping purposes[40 CFR 70.6(a)(3)(iii)(B); Regulation 5, Rule 460; Regulation 1, Rule 540].

3. The permittee shall report to the District calendar year plant operating information which includes the number of operating days, the amount of steam produced and the amount of diesel oil burned for each boiler[Regulation 1, Rule 240(d)].

4. The permittee shall maintain records of any startup or shutdown, any periods of malfunction of the air pollution control equipment, and any periods during which the CEMS or COMS are inoperative[40 CFR 60.7(b)].

5. The permittee shall submit by February 28<sup>th</sup> of each year, a combined report to comply with the General Provisions sections D.5 and F.3[Regulation 1, Rule 240(d)].

6. A monthly monitoring report shall be submitted to the District which identifies any deviation from these permit requirements including a summary of those deviations attributable to breakdowns, emergency events, CEMS or COMS malfunctions, emissions exceedances, and reporting or recordkeeping deviations required by this permit[Regulation 1 Rule 240(d)].

**G. Transfer of Ownership** -In the event of any changes in control or ownership of these facilities, this permit together with its terms and conditions shall be binding on all subsequent owners and operators. The permittee shall notify the succeeding owner and operator of the existence of this permit and its conditions by letter, a copy of which shall be forwarded to the District. Such permit transfer shall occur by application through the District[Regulation 1, Rule 240(j)].

#### **H. Reopening for Cause**

1. This permit may be modified, revoked, reopened, reissued, or terminated for the following reasons:
  - a. Additional requirements under the federal Clean Air Act become applicable to the facility for which three or more years remain on the original term of the permit. Such a reopening shall be completed

not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is to expire.

b. The District or EPA determines that the permit contains a material mistake made in establishing the emissions standards or limitations, or other requirements of the permit.

c. The District or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements. [40 CFR 70.7(f); Regulation 5, Rule 570]

2. The reopening of this permit for a change to be implemented for a specific permit unit will be allowed without the need to reopen the entire permit and all permit units. Should a general condition be changed, all the associated permit units affected would be reopened [Regulation 1, Rule 240(d)].

3. 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 70.6(a)(6)].

**I. Property Rights** - This permit does not convey any property rights of any sort, or any exclusive privilege [40 CFR 70.6(a)(6)].

**J. Permit Renewal and Expiration** - This permit is effective on the date of issuance and will expire in five years and must be renewed every five years thereafter. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted. For renewal of a permit, the designated representative shall submit a complete District application no earlier than 18 months and no later than 6 months before the expiration date of the current permit [40 CFR 70.5(a); Regulation 5, Rule 405(b)].

**K. Permit Modification** - The permittee shall submit an application for a minor or significant permit modification in accordance with District Regulation 5 [40 CFR 70.5(a); Regulation 5, Rule 405].

**L. Prohibitions** - These limitations apply to all emissions sources at the permittee's facility unless more specific and limiting requirements are listed for a individual permitted emissions unit in this permit.

1. **Public Nuisance** - The permittee shall not discharge such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public or which cause or have an natural tendency to cause injury or damage to business or property [H&S 41700].

2. **Visible Emissions** - The permittee shall not discharge into the atmosphere from any source whatsoever any air contaminant for a period or periods aggregating more than three (3) minutes in any one hour which is as dark or darker in shade as that designated as No. 2 on the Ringlemann Chart, as published by the United States Bureau of Mines; or of such opacity as to obscure an observer's view to a degree equal to or greater than Ringlemann 2 or forty (40) percent opacity [Regulation 1, Rule 410(a)].

3. **Fugitive Dust Emissions** - The handling, transporting, or open storage of material in such a manner which allow unnecessary amounts of particulate matter to become airborne, shall not be permitted. Reasonable precautions shall be taken to prevent particulate matter from becoming airborne [Regulation 1, Rule 430].

4. **Sulfur Oxide Emissions** - The permittee shall not discharge into the atmosphere from any single source of emissions whatsoever sulfur oxides, calculated as sulfur dioxide (SO<sub>2</sub>) in excess of 1,000 ppm [Regulation 1, Rule 440].

5. **Circumvention** - The permittee shall not construct, erect, modify, operate, or use any equipment which conceals an air contaminant emission, which would otherwise constitute a violation of the limitations of this permit, unless the operation or use of said equipment results in a significant reduction in the total emission of air contaminants [Regulation 1, Rule 400(b)].

6. **Regulation 2, Open Burning Procedures** - The permittee shall not ignite or cause to be ignited or suffer, allow or maintain any open outdoor fire for the disposal of rubber, petroleum or plastic wastes, demolition debris, tires, tar paper, wood waste, asphalt shingles, linoleum, cloth, household garbage or other combustible

refuse; or for metal salvage or burning of motor vehicle bodies except as provided in Rule 2-102, Exemptions[Regulation 2].

**7. Title VI, Stratospheric Ozone Protection** - The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, and 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

**8. National Emission Standard for Asbestos** - The permittee shall comply with the standards of 40 CFR Part 61 Subpart M which regulates demolition and renovation activities at the power plant as pertaining to asbestos materials.

This permit does not authorize the emission of air contaminants in excess of those allowed by the Health and Safety Code of the State of California or the Rules and Regulations of the North Coast Unified Air Quality Management District as stated in this permit. Any regulation or rule not cited in this permit which may be applicable to a particular emission unit will not be enforceable. This permit cannot be considered as permission to violate existing laws, ordinances, regulation or statutes of other governmental agencies. The violation of any of these terms and conditions shall be grounds for revocation of this permit, and shall be a violation of District Rules and Regulations.

**NORTH COAST UNIFIED  
AIR QUALITY  
MANAGEMENT DISTRICT**

707 L STREET  
EUREKA, CALIFORNIA 95501

PHONE (707) 443-3093  
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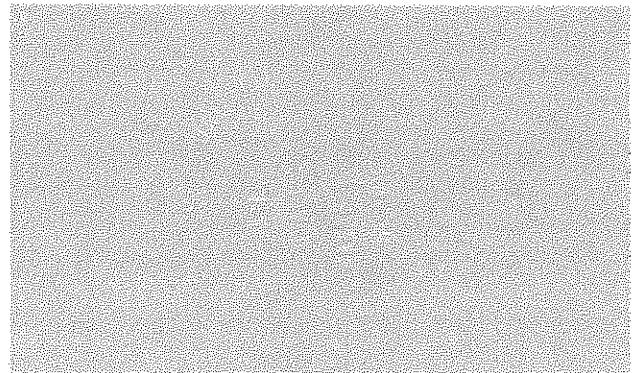
DATE:

1/31/17

BY:

Brian M. Wilson

BRIAN M. WILSON  
AIR POLLUTION CONTROL OFFICER



Permit Seal

**From:** [Jon Reisdorf](#)  
**To:** [Public Comment](#)  
**Subject:** Biomass code violations - Do what is right  
**Date:** Thursday, January 25, 2024 10:16:39 AM

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Some people who received this message don't often get email from [REDACTED]. [Learn why this is important](#)

We Very recently learned that the Scotia Biomass Plant has operated for 2 years without a permit NC Air Quality Management Board. This is unacceptable. We have lived in Humboldt County since 2004, moving because of its reputation for responsible stewardship of the environment. Allowing a Biomass plant Carte Blanche to commit violations should null and void the contract it has with RCEA.

Jon and Kathy Reisdorf



**From:** [Sue Y. Lee](#)  
**To:** [Public Comment](#)  
**Subject:** request RCEA to remove biomass energy from renewable portfolio  
**Date:** Thursday, January 25, 2024 1:16:40 PM

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Some people who received this message don't often get email from [REDACTED]. [Learn why this is important](#)

Dear Members of the Board of Directors for RCEA,

The Humboldt Sawmill Co (HSC) biomass plant has been operating for 2 years without a permit as required by the federal Clean Air Act and in violation of provisions of the North Coast Unified Air Quality Management District. That HSC has filed a renewal permit application in May, 2023 over a year after the permit to operate expired, instead of 6 months prior to expiration, does not mean that HSC can keep operating according to State, Federal and local air district regulations. Given this violation by HSC, and under this circumstance, a provision in RCEA's contract with HSC would allow RCEA to withdraw its contract with HSC for biomass energy.

HSC has also been found to have committed numerous air quality infractions, and are emitting nearly three hundred thousand metric tons of global warming carbon dioxide annually, a quantity equivalent to 80% of emissions from all Humboldt's passenger vehicles. As a consequence, the HSC biomass plant is endangering our planet's life support systems and the health of our collective children and future generations, and that is a moral issue.

Given the health and climate impacts of biomass energy production by HSC, please do what's morally right and protect the health of our planet and our children. Please pass a resolution to recommend that RCEA also do the morally right thing, and end its contract with HSC immediately and remove biomass electricity from its RePower renewable portfolio.

Thank you.

Sincerely,

sue y. lee mossman

RCEA Community Choice Energy customer

**From:** [Wendy Ring](#)  
**To:** [Lori Taketa](#)  
**Subject:** Please share with staff and board members. The air district is misquoting its own rules  
**Date:** Thursday, January 25, 2024 5:42:19 PM

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Federal regulations and NCUAQMD Rule 502 (which restates the federal law) spell out clearly what is required for a facility to keep operating without a license after its permit expires. The permit renewal application must be submitted "timely" which federal regulations define as no less than 6 months prior to permit expiration. If the renewal application is submitted less than 6 months prior to expiration, there is no "application shield" and the plant has to shut down when the permit expires. Humboldt Sawmill submitted their permit renewal application late, 2 months before expiration. Since their submission was not "timely", the plant is not eligible to keep operating without a permit. I have excerpted the relevant parts of the CFR and NCUAQMD rule below. I was wrong about how long the permit has been expired because I asked NCUAQMD for the current permit, they sent me one dated 2017, but there is no question that the permit expired 6 months ago and the plant has been operating illegally ever since. This is just one example of the air district not enforcing EPA regulations. There are more which are even more serious in terms of potential harm to the public.

The exact language is provided below:

CFR [Title 40](#) [Chapter I](#) [Subchapter C](#) [Part 70](#) § 70.5

§ 70.5 Permit applications.

(a) (1) **Timely application.** (iii) For purposes of permit renewal, a timely application is one that is submitted at least 6 months prior to the date of permit expiration, or such other longer time as may be approved by the Administrator that ensures that the term of the permit will not expire before the permit is renewed. In no event shall this time be greater than 18 months

[Title 40](#) [Chapter I](#) [Subchapter C](#) [Part 70](#) § 70.7

(c) **Permit renewal and expiration.** "Permit expiration terminates the source's right to operate unless a **timely and complete renewal application** has been submitted consistent with [paragraph \(b\)](#) of this section and [§ 70.5\(a\)\(1\)\(iii\) of this part.](#)"

NCUAQMD Rule 502

A 2. Application Shield: If a responsible official submits, pursuant to Regulation V, a **timely and complete** application for a permit, a source shall not be deemed in violation of the requirement to have a permit to operate until the APCO takes final action on the application. [Reference: 40 CFR 70.7(b) and (e)(2)(v)]

B 2. Permit Renewal: For renewal of a permit, a responsible official shall submit a complete standard application **no earlier than 18 months and no later than 6 months before the expiration date** of the current permit to operate. A responsible official shall submit applications for renewal of permits to operate for all emissions units at a stationary source for simultaneous review. [Reference: 40 CFR 70.5(a)(1)(iii)]

Here are links to the sources cited above.

[Code of Federal Regulations Permit issuance, renewals, openings, and revisions](#)  
<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-70/section-70.5>  
[NCUAQMD Rule 502 Application and permit requirements](#)  
[Criminal Provisions of the Clean Air Act](#)

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**North Coast Unified  
Air Quality Management District**  
707 L Street, Eureka, CA 95501  
(707) 443-3093  
[www.ncuaqmd.org](http://www.ncuaqmd.org)



**Press Release from the  
North Coast Unified Air Quality Management District**

FOR IMMEDIATE RELEASE: January 25, 2024

A recent press release from the Coalition for Clean Energy contains incorrect information regarding the status of the Title V Operating Permit for the Humboldt Sawmill Company facility located in Scotia, California.

Federal operating permits are issued for a term of five years and are subject to renewal. District rules require that an application be submitted before the expiration of the permit term. To allow sufficient time for the permitting authority to evaluate the application, application materials are to be submitted a minimum of 6 months in advance of the permit expiration date. Failure to do so may result in enforcement action.

The fifth term of Humboldt Sawmill Company's Title V permit ended on July 19, 2023. A renewal application was received by the District on May 12, 2023. The District deemed the application to be complete. Pursuant to District Rules, because the application was submitted before the permit expired, a permit shall remain in effect until such time as the permitting authority issues a final decision on the application. At any time throughout the application review process, the District may request additional information.

The application processing timeframe established in District Rules is 18 months from the date the application is received. Staff anticipates a final decision within the established regulatory time constraints. As mentioned above, the District did receive a complete application before the expiration date of the current permit to operate. However, the receipt of an application outside the timing requirements of District Rule 502(B)(2), is potentially a procedural violation. Similar to other air districts in California, the District is investigating the incident and may issue a violation notice pending the outcome of the investigation. A procedural violation is not considered a *high-priority violation* per EPA criteria.