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<http://www.co.yakima.wa.us/cleanair>

WEYERHAEUSER COMPANY  
600 W. AHTANUM RD.  
PO BOX 1322  
YAKIMA, WASHINGTON 98907

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REGULATORY ORDER  
NO. SM-WC-01-2005

## 1.0 LEGAL AUTHORITY:

This Order is issued pursuant to the authority of the Yakima Regional Clean Air Authority (YRCAA) Regulation 1, Revised Code of Washington (RCW) 70.94.141, RCW 43.21C, Washington Administrative Code (WAC) 173-400-091 and the State Environmental Policy Act (SEPA) Rules, WAC 197-11 and SEPA Procedures, WAC 173-802.

## 2.0 FINDINGS OF FACT:

The Yakima Regional Clean Air Authority (YRCAA) makes the following Findings of Fact:

2.1 WAC 173-401-330(7), Federally Enforceable Limits, states in part:

"Any Source which is defined as a chapter 401 source solely because its potential to emit exceeds the annual tonnage thresholds defined in WAC 173-401-200(17) shall be exempt from the requirements to obtain an operating permit when federally enforceable conditions which limit that source's potential to emit to levels below the relevant tonnage thresholds have been established for that source.

"In applying for an exemption under this subsection, the owner or operator of the source shall demonstrate to the permitting authority that the source's potential to emit, taking into account any federally enforceable restrictions assumed by the source, does not exceed the tonnage thresholds defined in WAC 173-401-200(17). Such demonstrations shall be in accordance with WAC 173-401-520 and shall contain emissions measurement and monitoring data, location of monitoring records, and other information necessary to support the source's emission calculations.

2.2 WAC 173-400-091(1) states:

"Upon request by the owner or operator of a source, ecology or the authority with jurisdiction over the source shall issue a regulatory order that limits the source's potential to emit any air contaminant or contaminants to a level agreed to by the owner or operator and ecology or the authority with jurisdiction over the source."

- 2.3 By limiting the potential to emit to levels below the tonnage thresholds defined in WAC 173-401-200(17) by following the provisions of this Order, Weyerhaeuser Company, known hereafter as WC or the permittee will not be required to obtain an Operating Permit in accordance with WAC 173-401, Operating Permit Regulation.
- 2.4 The permittee is the owner and the operator of a Containerboard Packaging Plant which manufactures a corrugated shipping boxes at the above address. The facility is an air pollution source under the jurisdiction of the Yakima Regional Clean Air Authority. The permittee uses Flexographic printing for the produced corrugated containers. The facility emits Volatile Organic Compounds (VOCs), some of which are Hazardous Air Pollutants (HAPs) in accordance with the Federal Clean Air Act (FCAA). The Potential to Emit (PTE) from this facility can exceeds the threshold level required to operate under the FCAA Title V air operating permit program and Washington Administrative Code (WAC) chapter 173-401, Operating Permit Regulation.
- 2.5 The permittee is subject to 40 CFR Part 63 Subpart KK (National Emission Standards for the Printing and Publishing Industry) based on the PTE. The permittee voluntary requested a plant-wide HAP emissions limits.
- 2.6 The current maximum PTE of pollutants generated in the facility are based on the maximum equipment capacity and year round operation. The facility-wide limitation on HAPs emissions establishes a federally enforceable maximum limit and a baseline for any future permitting process. The facility-wide limitation on HAPs emissions makes the facility a synthetic minor source or area source for HAP and not subject to all provisions of the 40 CFR, Part 63 Subpart KK except provisions of §63.829(d) and §63.830(b)(1).
- 2.7 The voluntary emission limitation should decrease the maximum emission of the facility-wide HAP emissions. Implementation of this Regulatory Order with good record keeping and the existing pollution prevention requirements should mitigate environmental impacts and potentially result in environmental benefits.

### 3.0 APPROVAL CONDITIONS ORDER:

THEREFORE, IT IS ORDERED BY the Yakima Regional Clean Air Authority in relation to the above that the permittee be subject to the limitations and conditions of this regulatory order as follows:

- 3.1 The maximum actual allowable facility-wide combined VOC emissions shall not be more than 20 tons in any rolling 12-month arithmetic mean average. The printing operation including the Flexographic printing operations shall include ink thinning, actual printing and the use of volatile organic solvent during any cleaning associated with all printing operations in the facility.
- 3.2 The maximum actual allowable facility-wide emission of any single HAP from the facility including the flexographic printing operations shall not be more than 9.0 tons on a rolling 12-month arithmetic mean average. The printing operations shall include ink thinning, actual printing and the use of volatile organic solvent during any cleaning associated with all printing operations in the facility.
- 3.3 The maximum actual allowable facility-wide combined HAP emissions from the facility including all flexographic printing operations shall not be more than 20.0 tons on a rolling 12-month arithmetic mean average. The printing operations shall include ink thinning, actual printing and the use of volatile organic solvent during any cleaning associated with all facility printing operations.
- 3.4 The maximum allowable requested emissions limit for the rest of the pollutants for the facility-wide are as follows for any 12 month rolling average:

Pollutants Tons per Year	Particulate Matter (PM)	Small Particulate Matter (PM <sub>10</sub> )	Oxides of Sulfur (SO <sub>x</sub> )	Oxides of Nitrogen (NO <sub>x</sub> )	Carbon Monoxide (CO)
Plant- Wide Emissions	12.50	7.50	20.00	20.00	25.00

- 3.5 The consumption of each ink and solvent/thinner used in the printing, flexographic operation and facility wide shall be tallied monthly. Records of such data shall be maintained at the facility for at least the past five (5) years from any present year. The monthly record must be completed not later than 10 days from the beginning of every month.
- 3.6 The Material Safety Data Sheets (MSDS) of each of the specific ink and solvent/thinner used in the printing operations shall be maintained in the facility

and readily available upon request by YRCAA or EPA administrator or during an inspection.

- 3.7 Actual emission of any pollutant from a flexographic printing operation shall be determined by multiplying the pollutant content in the ink and/or solvent/thinner with the quantity of the ink and/or solvent/thinner used and considering any emissions control when applicable.
- 3.8 The actual facility-wide combined VOC emissions from printing operations shall be determined each month. Such VOC emissions shall be determined using the data generated in Section 3.5 above. The total facility-wide combined VOC emissions is the sum of all VOC emissions from the whole facility including the flexographic printing units.
- 3.9 The total actual individual HAP emissions from each ink and/or solvent/thinner used in each flexographic printing operation shall be determined each month. Such HAP emissions shall be determined using the data generated in Section 3.5 for the quantity of ink and solvent/thinner; in Section 3.5 for the HAP content of the ink and solvent/thinner. The total actual individual HAP emissions is the sum of individual HAP emissions from the flexographic printing units and the facility wide usage.
- 3.10 Records of all data shall be maintained in a readily retrievable manner for a period of five years and be made available at the plant site to authorized YRCAA representative or the EPA administrator upon request.
- 3.11 The above records including all emissions shall be submitted to YRCAA annually with the registration program. The permittee shall register the source with YRCAA annually.
- 3.12 Legible copies of this Order shall be on-site in a location known by and available to employees in direct operation of the described equipment and available to YRCAA or the EPA administrator upon request.
- 3.13 Access to the source by the United States Environmental Protection Agency or the YRCAA shall be permitted upon request for the purposes of compliance assurance inspections. Failure to allow access is grounds for revocation of this Order.
- 3.14 Nothing in this Order shall be construed so as to relieve the permittee of its obligations under any state, local, or federal laws or regulations.
- 3.15 It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Order.

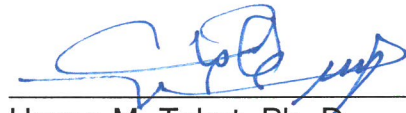
- 3.16 This Order is valid only after payment of appropriate fee(s) required pursuant to WAC 173-400-104.
- 3.17 If the permittee determines they no longer want to limit emissions below the annual above threshold, they must submit an operating permit application in accordance with WAC 173-401. Until an operating permit is issued, the company will continue to be bound by this Order.
- 3.18 Any application from, report, or compliance certification, including the annual consumption report, submitted pursuant to this Order shall contain certification by a responsible official of truth, accuracy, and completeness. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- 3.19 All plans, specifications, other information and any further authorizations or approvals or denials in relation to this project, shall be incorporated herein and made a part of YRCAA file and this order.
- 3.20 Nothing in this approval shall be construed as obviating compliance with any requirement(s) of law including those imposed pursuant to the Clean Air Washington Act, and rules and regulations thereunder except that the permittee's application for, receipt of, and compliance with this order exempts the permittee from the requirement to obtain an Air Operating Permit.
- 3.21 Any violation of such rules and regulations or of the terms of this approval, including, but not limited to, exceedances of emission limits demonstrated by source testing or emissions calculations, shall be subject to the sanctions provided in RCW, Chapter 70.94.430 and YRCAA Regulation 1, Article 5, Penalties.
- 3.22 Authorization may be modified, suspended or revoked in whole or part for cause including, but not limited to, the following:
- 3.22.1 Violation of any terms or conditions of this authorization; or,
- 3.22.2 Obtaining this authorization by misrepresentation or failure to disclose fully all relevant facts.
- 3.23 The provisions of this authorization are severable and, if any provision of this authorization, or application of any provisions of this authorization to any circumstance, is held invalid, the application of such provision to their

circumstances, and the remainder of this authorization, shall not be affected thereby.

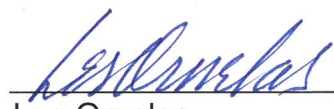
- 3.24 Any person feeling aggrieved by this order permit may obtain review thereof by application, within thirty (30) days of receipt of this order as specified in RCW 43.21B to the Pollution Control Hearings Board, P.O. Box 4903, Olympia, WA. 98504-4903. Concurrently, a copy of the application must be sent to the Yakima Regional Clean Air Authority, 6 So. 2nd St., Larson Building, Room 1016. Yakima, WA. 98901. These procedures are consistent with the provisions of Chapter 43.12B RCW and the rules and regulations adopted thereunder.

DATED at Yakima, Washington this 16th day of August, 2005.

PREPARED BY:

  
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Supervisor Air Quality Engineer  
Yakima Regional Clean Air Authority

APPROVED BY:

  
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Les Ornelas  
Director - APCO  
Yakima Regional Clean Air Authority