

**ORDER OF APPROVAL**  
**NOTICE OF CONSTRUCTION 23NOC1606**  
ISSUED to Pacific Northwest Renewable Energy, LLC on

**MAY 14 2024**

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This Order of Approval (“Order”) is issued in accordance with Olympic Region Clean Air Agency (“ORCAA”) Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6.

Conditional approval to establish a wood pellet manufacturing facility located at 411 Moon Island Road, in Hoquiam (“Approved Location”), for operation solely as described in the associated Notice of Construction (“NOC”) application 23NOC1606, is hereby GRANTED to Pacific Northwest Renewable Energy, LLC (“Applicant”), subject to the Conditions of Approval listed below.

This Order and the Conditions of Approval herein remain in effect for the life of the Approved Equipment as used at the Approved Location and shall be binding on Applicant, current owners and operators of the equipment, and Applicant’s heirs, successors and assigns unless amended or superseded by a subsequent Order issued by ORCAA or unless the equipment is permanently shut down. The Applicant must notify any subsequent owner, operator, heirs, successor or assigns of this Order and the Conditions of Approval herein.

Conditions of Approval established in this Order shall be enforceable in addition to any applicable state, local and federal regulations, or standards in existence now or in the future. Compliance with the conditions of this Order do not relieve the Applicant or any owner or operator from compliance with ORCAA Regulations, chapter 70A.15 of the Revised Code of Washington, or any other emissions control requirements, nor from any penalties for failure to comply with the same. Applicant may appeal this Order to the Pollution Control Hearings Board (“PCHB”) by filing a written appeal with the PCHB and serving a copy upon ORCAA within thirty (30) days of receipt of this Order.

This Order is GRANTED, subject to the following Conditions of Approval:

1. **Approved Equipment.** The new wood pellet manufacturing facility as described in Notice of Construction application No. 23NOC1606, application addendums, and the associated Final Determination is approved for construction and operation subject to conditions in this Order of Approval.  
[Regulatory Basis: ORCAA Rule 6.1(a); ORCAA Rule 6.1.2(l); 40 CFR Part 52.2470(c), Table 6]
2. **Preapproval Required.** Prior approval by ORCAA may be required for the following as specified in ORCAA Rule 6.1:
  - a) Construction, installation, or establishment of any stationary source;

- b) Modification to any existing stationary source;
- c) Replacement or substantial alteration of emission control technology installed on an existing stationary source; or,
- d) Deviations from the approved plans, drawings, data, and specifications of the stationary sources listed in the following table:

Source ID	Approved Stationary Sources	Approved Control Technologies and Measures
TD-01	Truck Dumper – White Wood (75' Back-On Truck Dump Platform)	Dust control plan
TD-02	Truck Dumper – Chips (75' Back-On Truck Dump Platform)	Dust control plan
TD-03	Truck Dumper – Hog Fuel (75' Back-On Truck Dump Platform)	Dust control plan
SP-01	Storage Pile – White Wood	Dust control plan
SP-02	Storage Pile – Chips	Dust control plan
SP-03	Storage Pile – Hog Fuel	Dust control plan
VEH-01	Vehicle Traffic – Trucks	Dust control plan
VEH-02	Vehicle Traffic – Front End Loaders	Dust control plan
EP-01.1	Chip Cleaning Line	Cyclo-filter
EP-01.2	White Wood Disc Screening	None
EP-01.3	Hog Fuel Feed	None
EP-02	Drying Line Emissions Units (EU):  EU 02.1 – Furnace: <ul style="list-style-type: none"> <li>• Fuel – Biomass</li> <li>• Start-up Fuel – Biomass + Diesel</li> <li>• 4 reciprocating grate zones</li> <li>• Heat rate 165 MMBtu/hr total</li> <li>• Under-fire and overfire air + secondary combustion zone</li> </ul> EU 02.2 – Drum dryer: <ul style="list-style-type: none"> <li>• Ø 20' by 90' long</li> <li>• Feedstock input – 85.5 ton/h @ 45% mc)</li> <li>• Operating temperature around 750°F</li> <li>• Operating airflow around 124,031 ACFM</li> </ul>	Cyclones (2 units in parallel)  Wet Electrostatic Precipitator: <ul style="list-style-type: none"> <li>• Output Rating: 70 kilovolt, 1500 milliamp.</li> <li>• Input: 105 KVA, 460 V / 3-phase / 60 Hz.</li> <li>• 3 Fields and 621 Ø10" tubes</li> </ul> Regenerative Thermal Oxidizer: <ul style="list-style-type: none"> <li>• 4 chambers</li> <li>• 20.2 MMBtu/hr gas consumption</li> </ul>
EP-03	Dry Product Intermediate Storage Silo 1: <ul style="list-style-type: none"> <li>• Volume (gross) 45,732 ft<sup>3</sup></li> </ul>	Silo vent filters
EP-04	Dry Product Intermediate Storage Silo 2: <ul style="list-style-type: none"> <li>• Volume (gross) 45,732 ft<sup>3</sup></li> </ul>	Silo vent filters
EP-05	Wet Hammer Mill 1	Baghouses or Cyclo-filters (4 units, one for each DHM):
EP-06	Wet Hammer Mill 2	
EP-07	Dry Hammer Mills (DHM, 4 units): <ul style="list-style-type: none"> <li>• 15.5 ton/h design capacity each</li> <li>• 900 HP each</li> </ul>	<ul style="list-style-type: none"> <li>• Each exhausting to RCO</li> </ul> Baghouses or Cyclo-filters (2 units, one per each pellet cooler): <ul style="list-style-type: none"> <li>• Each exhausting to RCO</li> </ul>
EP-08	Pellet Mill Emissions Units (EU)  EU 08.1 – Pelletizers (12 units): <ul style="list-style-type: none"> <li>• 500 HP each</li> <li>• 5.5 ton/h</li> </ul> EU 08.2 – Pellet Coolers (2 units)	 Baghouses or Cyclo-filters (2 units, one per each wet hammer mill): <ul style="list-style-type: none"> <li>• Each exhausting to RCO</li> </ul> Regenerative Catalytic Oxidizer (RCO): <ul style="list-style-type: none"> <li>• Controls exhaust from DHMs, Pelletizers, Pellet Coolers, and wet hammer mills</li> </ul>

Source ID	Approved Stationary Sources	Approved Control Technologies and Measures
		<ul style="list-style-type: none"> <li>Design Airflow = 29,500 ACFM from DHM + 76,000 ACFM from pelleting line + 20,440 ACFM from wet hammer mills</li> <li>5.8 MMBtu/hr design natural gas consumption</li> </ul>
EP-09	Milled Dry Product Intermediate Storage Silo <ul style="list-style-type: none"> <li>Volume (gross) 45,732 ft<sup>3</sup></li> </ul>	Silo vent filters
EP-10	Pellet Storage Silo #1	Silo vent filters
EP-11	Pellet Storage Silo #2	
EP-12	Pellet Storage Silo #3	
EP-13	Pellet Storage Silo #4	
EP-14	Pellet Storage Silo #5	
EP-15	Truck Loadout	Silo Filter and shrouded dump chute

[Regulatory Basis: ORCAA Rule 6.1(a); ORCAA Rule 6.1.2(l); WAC 173-400-110(2); WAC 173-400-111(10)]

3. **Cyclo-filters and Baghouses.** In addition to applicable general emissions limits and standards, the following limits and standards apply to all cyclo-filters and baghouses emitting directly to the ambient air:

- a) Cyclo-filters and baghouses must be operating whenever the pellet plant is operating.
- b) All cyclo-filters and baghouses must be equipped with a working manometer to read pressure drop across the filters.
- c) Visible emissions must not exceed 0% opacity as measured in accordance with EPA 40 CFR Part 60 Appendix A Method 9.
- d) Total filterable emissions must not exceed 0.004 grains per standard cubic feet, 1-hour average, measured in accordance with EPA Method 5 in Appendix A to 40 CFR Part 60, or an alternative method approved by ORCAA.
- e) Baghouses and Cyclo-filters must exhaust through a vertical stack that provides suitable conditions for stack testing per Method 5.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2); WAC 173-460-040(3)]

4. **Silo Vents.** In addition to applicable general emissions limits and standards, the following limits and standards apply to all silo vents:

- a) Silo vents must be equipped with suitable filters capable of at least 98% filtration efficiency for the size range of particles emitted.
- b) Filter efficiency must be confirmed and documented by appropriate certification and/or guarantees provided by the filter manufacturer.
- c) Visible emissions from any silo vent must not exceed 0% opacity as measured in accordance with EPA 40 CFR Part 60 Appendix A Method 9.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2); WAC 173-460-040(3)]

5. **Drying Line.** In addition to applicable general emissions limits and standards, the following limits and standards apply to emissions from the drying line (furnace and drum dryer):

- a) Emissions from the RTO stack must not exceed the following limits:



Pollutant	Limit	Reference Test Methods
PM <sub>10</sub> (filterable + condensable)	12.7 lbs/hr, 1-hr ave	EPA Methods 1-4, 5, 201, or 201A, plus EPA Reference Method 202 from 40 CFR Part 60 Appendix A-1, or equivalent methods agreed to in advance by ORCAA. Use of EPA Reference Method 5 assumes all filterable particulate is PM <sub>10</sub> .
NO <sub>x</sub>	53 lbs/hr, 1-hr ave	EPA Methods 1-4, and 20 from 40 CFR Part 60 Appendix A, or an equivalent method agreed to in advance by ORCAA.
CO	42 lbs/hr, 1-hr ave	EPA Methods 1-4, and 10 from 40 CFR Part 60 Appendix, or an equivalent method agreed to in advance by ORCAA.
VOC (Per EPA's Wood Products Protocol 1)	8.92 lbs/hr, 1-hr ave	EPA Method 1-4, and 25A from 40 CFR Part 60 Appendix A, or equivalent method agreed to in advance by ORCAA. Concurrent testing for both methanol and formaldehyde. VOC must be determined using EPA Method OTM-26 (see condition 8). Formaldehyde and methanol testing methods (or equivalent methods agreed to in advance by ORCAA): <ul style="list-style-type: none"> <li>• Methanol: EPA Method 308 or 320 from 40 CFR Part 63 Appendix A or NCASI method CI/WP-98.01</li> <li>• Formaldehyde: EPA Method 316 or 320 from 40 CFR Part 63 Appendix A or NCASI Method CI/WP-98.01</li> </ul>
HCl	0.028 lbs/hr, 1-hr ave	EPA Methods 1-4, and 26 or 26A (M26 or M26A) from 40 CFR part 60, appendix A-8.
Hg	0.0006 lbs/hr, 1-hr ave	EPA Methods 1-4, and 29, 30A, or 30B from 40 CFR Part 60, appendix A-8. For Method 29, collect a minimum of 4 dscm per run; for Method 30A or Method 30B, collect a minimum sample as specified in the method; for ASTM D6784 collect a minimum of 4 dscm.
Opacity	5%, 6-minute average	EPA Method 9 from 40 CFR Part 60 Appendix A.

- b) At all times, except during startup as allowed by condition 9, emissions from the furnace and dryer must exhaust through the air pollution control system consisting of the pair of cyclones, Wet Electrostatic Precipitator (WESP) and Regenerative Thermal Oxidizer (RTO).
- c) The WESP must be equipped with a means to continuously monitor and record VDC and mADC of each WESP field.
- d) The cake produced by the WESP decanter centrifuge must be properly disposed of and must not be recycled back into the furnace fuel feed system or in the pellet feedstock.
- e) All combustion chambers of the RTO must be equipped with thermocouples to continuously measure and record combustion chamber temperature.
- f) Except as provided by conditions 9 and 10, emissions exhausting through either the furnace or dryer bypass stacks are presumed to be in violation of the limits and standards of this condition.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2); WAC 173-460-040(3)]

6. **Wet Hammer Mill and Pellet Mill.** In addition to applicable general emissions limits and standards, the following limits and standards apply to emissions from the wet hammer mills, dry hammer mills, pelletizers and pellet coolers:
  - a) At all times, exhaust from the wet and dry hammer mills must exhaust through their respective baghouses and the Regenerative Catalytic Oxidizer (RCO).
  - b) At all times, emissions from the pellet coolers must exhaust through their respective baghouses and the RCO.
  - c) All baghouses must be equipped with a working manometer to read pressure drop across the filters.

- d) All combustion chambers of the RCO must be equipped with thermocouples to continuously measure and record combustion chamber temperature directly after the catalyst bed.
- e) Emissions from the RCO stack must not exceed the following limits:

Pollutant	Limit	Reference Test Methods
PM <sub>10</sub> (filterable + condensable)	3.0 lbs/hr, 1-hr ave	EPA Methods 1-4, 5, 201, or 201A, plus EPA Reference Method 202 from 40 CFR Part 60 Appendix A-1, or equivalent methods agreed to in advance by ORCAA. Use of EPA Reference Method 5 assumes all filterable particulate is PM <sub>10</sub> .
VOC (Per EPA's Wood Products Protocol 1)	9.0 lbs/hr, 1-hr ave	EPA Method 1-4, and 25A from 40 CFR Part 60 Appendix A, or equivalent method agreed to in advance by ORCAA. Concurrent testing for both methanol and formaldehyde. VOC must be determined using EPA Method OTM-26 (see condition 8). Formaldehyde and methanol testing methods (or equivalent methods agreed to in advance by ORCAA): <ul style="list-style-type: none"> <li>Methanol: EPA Method 308 or 320 from 40 CFR Part 63 Appendix A or NCASI method CI/WP-98.01</li> <li>Formaldehyde: EPA Method 316 or 320 from 40 CFR Part 63 Appendix A or NCASI Method CI/WP-98.01</li> </ul>
Opacity	5%, 6-minute average	EPA Method 9 from 40 CFR Part 60 Appendix A.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2); WAC 173-460-040(3)]

7. **Facility-wide Annual Emissions Limits.** Facility-wide annual emissions must not exceed the following limits in terms of tons per consecutive 12-month period:

Pollutant	Facility-Wide Limit	Compliance Determination Methods
PM <sub>10</sub> (filterable + condensable)	98 tons/12-month period	Compliance determined by calculating tons of each pollutant based on ORCAA-approved emissions factors and the actual fuels combusted, tons of pellets produced, and operating schedule over the previous 12-month period according to condition 8.
NO <sub>x</sub>	230 tons/12-month period	
CO	186 tons/12-month period	
VOC (Per EPA's Wood Products Protocol 1)	68 tons/12-month period	

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2); WAC 173-460-040(3)]

8. **Monitoring Facility-Wide Emissions.** Compliance with facility-wide annual emissions must be determined monthly by calculating facility-wide total tons of each pollutant for the previous 12-consecutive month period as follows:

- a) For the drying line (furnace and dryer):
- i) PM<sub>10</sub> and VOC emissions must be calculated based on emission factors in terms of pounds per oven dried ton of pellets (lb/ODT) determined through source testing, times the actual tons of pellets produced, or an alternative method of calculation approved by ORCAA. Emissions factors must be updated with each required source test.
  - ii) VOC emissions must be determined using EPA's Interim VOC Measurement Protocol for the Wood Products Industry – July 2007 (otherwise known as Other Test Method 26 or

OTM-26) and must include quantification of the individual contributions of methanol and formaldehyde based on the most recent source test results. VOC emissions calculated using this method are referred to as "WPP1 VOC".

- iii) NO<sub>x</sub> and CO emissions must be determined using data from the NO<sub>x</sub> and CO continuous emission rate monitoring systems (CERMS) required by condition 11.
  - iv) Emissions from the dryer line during any period when pellets are not produced such as, but not limited to, startup, shutdown, and idle mode, must be included in the facility-wide total emissions.
- b) For the RCO exhaust (pellet mill and wet hammer mills):
- i) Emissions of NO<sub>x</sub>, CO, PM<sub>10</sub>, and VOC must be calculated based on emission factors in terms of pounds per oven dried ton of pellets produced (lb/ODT) determined through source testing, times the actual tons of pellets produced, or an alternative method of calculation approved by ORCAA. Emissions factors must be updated with each required source test.
  - ii) VOC emissions must be determined using EPA's Interim VOC Measurement Protocol for the Wood Products Industry – July 2007 (otherwise known as Other Test Method 26 or OTM-26) and must include quantification of the individual contributions of methanol and formaldehyde based on the most recent source test results. VOC emissions calculated using this method are referred to as "WPP1 VOC".
  - iii) Emissions from the dryer line and pellet mill during any periods when pellets are not produced such as, but not limited to, startup, shutdown, and idle mode, must be included in the facility-wide total emissions.
- c) PM<sub>10</sub> emissions from process units (baghouses, cyclo-filters, silo vents) must be calculated based on 0.004 grains per standard cubic feet, and each unit's exhaust rate and the hours they operated, or an alternative method of calculation approved by ORCAA.
- d) PM<sub>10</sub> emissions from road dust created by traffic (front end loaders and trucks) must be calculated based on equations from AP-42 Section 13.2.2 and vehicle miles traveled at the facility by front end loaders and haul truck, or an alternative method of calculation approved by ORCAA.
- e) PM<sub>10</sub> emissions from process fugitive sources (truck dumpers, storage piles, chip screening) must be calculated based on equations from Particulate Matter Potential to Emit Emissions Factors for Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest Indian Country (EPA Region 10, May 8, 2014) and actual production over the 12-month period, or an alternative method of calculation approved by ORCAA.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2); WAC 173-460-040(3)]

9. **Furnace/Dryer Startups.** In addition to applicable general emissions limits and standards, the following requirements apply to operation of the furnace and drum dryer during startups:
- a) Cold startup must be initiated using clean, dry fuels including dry wood and ultra-low sulfur diesel.
  - b) Furnace exhaust during a startup may bypass the drying line air pollution control system through the furnace bypass stack provided:
    - i) Bypass of the air pollution control system (cyclones, WESP, RTO) does not exceed 30 minutes during any single startup;

- ii) The number of startups that bypass the air pollution control systems and exhaust through the furnace bypass stack does not exceed 10 startups per each 12-month period;
  - iii) Operation of the air pollution control system including the WESP and RTO are initiated so that these units are fully functional and ready to accept emissions from the furnace and dryer as soon as possible after a startup is initiated;
  - iv) Exhausting through the air pollution control system is initiated as soon as possible after a startup is initiated.
- c) A sufficient amount of clean dry fuel must be maintained at all times to minimize emissions during startups.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2); WAC 173-400-081; WAC 173-460-040(3)]

**10. Furnace/Dryer Planned Shutdowns.** In addition to applicable general emissions limits and standards, the following requirements apply to operation of the furnace and drum dryer during planned shutdowns:

- a) The air pollution control system must be fully functioning during a planned shutdown;
- b) Exhaust of hot gases through the furnace bypass stack during a planned shutdown may commence once there is no combustion occurring on the furnace grates;
- c) Exhaust of hot gases through the dryer bypass stack during a planned shutdown may commence once there is no combustion on the furnace grates and no material remaining in the drum dryer.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2); WAC 173-460-040(3)]

**11. Dryer Line Emissions Monitoring.** Ongoing compliance with the drying line NO<sub>x</sub> and CO limits in condition 5a must be continuously monitored using continuous emission rate monitoring systems (CERMS) for measuring NO<sub>x</sub> and CO pollutant mass rates in lb/hr.

- a) The NO<sub>x</sub> and CO CERMS must meet applicable requirements from 40 CFR Part 60, Appendix B.
- b) The NO<sub>x</sub> and CO CERMS must meet applicable procedures and requirements from 40 CFR Part 60, Appendix F, including requirements and schedules for Relative Accuracy Test Audits (RATA).

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2)]

**12. Performance Testing.** The following requirements apply to all performance testing. For purposes of this condition, performance testing includes the RATA of the NO<sub>x</sub> and CO CERMS.

a) **Performance Testing Schedule.**

- i) The following performance tests must be completed within 180-days of commencing operation of the facility to demonstrate compliance with emissions limits and determine emissions factors:
  - (1) Emissions from the RTO stack must be tested for each pollutant in Condition 5a.
  - (2) Emissions from the RCO stack must be tested for each pollutant in Condition 6e.



- (3) Acetaldehyde, acrolein, propionaldehyde and phenol emissions from the RTO stack and the RCO stack must be tested according to EPA Method 320 from 40 CFR Part 63 Appendix A, or an alternative method approved by ORCAA.
- ii) Following the initial performance tests required in (i), the following performance tests must be completed every five years or whenever required by ORCAA:
  - (1) Emissions from the RTO stack must be tested for each pollutant in Condition 5a.
  - (2) Emissions from the RCO stack must be tested for each pollutant in Condition 6e.
- b) Performance Testing Requirements.**
  - i) Performance testing must be conducted during operating conditions with highest emissions unless otherwise approved by ORCAA.
  - ii) Compliance with each emissions limit must be determined from the average of three separate 1-hour test runs unless otherwise approved by ORCAA.
  - iii) RATA of the NO<sub>x</sub> and CO CERMS must be conducted:
    - (1) According to the requirements from 40 CFR Part 60, Appendix F; and
    - (2) Concurrently with RTO performance testing.
  - iv) Testing for formaldehyde and methanol must be conducted concurrently with VOC testing.
  - v) Testing for NO<sub>x</sub> and CO must be conducted concurrently.
- c) Notifications, Plans, and Reports.**
  - i) Performance testing must be conducted consistent with an ORCAA approved test plan.
  - ii) A test plan must be submitted to ORCAA for approval at least 45 days prior to conducting a required performance test.
  - iii) The test plan must describe:
    - (1) Air emissions test methods;
    - (2) Target operating conditions for testing;
    - (3) Performance indicators that will be monitored during the testing; and,
    - (4) Methods for calculating emissions factors.
  - iv) A test report must be submitted to ORCAA within 45 days of conducting any performance test.
  - v) The test report must include for each test run:
    - (1) The concentrations and pollutant mass rates in pounds per hour for each pollutant measured;
    - (2) Emissions factors in terms of pounds of pollutant per oven dry ton of pellets produced;
    - (3) The rate of pellet production;
    - (4) Key operating indicators of the source and pollution control technology.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-40-113(2); WAC 173-460-040(3)(a); ORCAA Rule 6.1.2(l); WAC 173-400-111(10)]

**13. Operation and Maintenance Plan.** The owner or operator must devise and implement an operation and maintenance plan (O&M Plan) to minimize emissions from all sources and modes of operation at the facility. The O&M Plan must be submitted to ORCAA for approval within the first six months from commencement of operation of the facility. The O&M Plan must include, but is not limited to, the following elements:



- a) Dust prevention plan describing company policies to prevent fugitive dust emissions including, at a minimum, vehicle speed limits, application of dust suppressants to haul roads, minimizing material drop heights, surveying the facility for fugitive dust; procedures for minimizing for fugitives during truck loading; and minimizing visible dust during feedstock and fuel dumps;
- b) Cyclo-filter maintenance plan that describes how acceptable operating pressure drop ranges will be determined and applied, how and when cyclo-filters will be inspected, and how filters will be maintained;
- c) WESP maintenance plan that describes how acceptable performance indicators will be determined, how quality of flush water will be maintained, how centrifuge cake will be disposed of, and detailed startup and shutdown procedures;
- d) RTO maintenance plan that describes how RTO performance will be monitored, when thermocouples will be changed out, and detailed startup and shutdown procedures;
- e) RCO maintenance plan that describes how RCO performance will be monitored, how performance of the catalyst will be monitored and maintained, and detailed startup and shutdown procedures;
- f) Detailed startup and shutdown procedures for the furnace and dryer;
- g) How proper combustion in the furnace will be monitored and maintained;
- h) Plan describing the means and methods for monitoring time emissions bypass air pollution control systems for both the dryer line and pellet mill.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2)]

14. **Emissions Inventory.** On an annual basis, the owner or operator must complete and submit to ORCAA an annual emissions inventory (inventory) of all regulated pollutants from all emissions units. Actual emissions must be based on actual operating data and ORCAA approved emission factors. The inventory must be accompanied by all associated calculations and data and must be certified by a Responsible Official as defined under WAC 173-401-200(27) as being true and accurate.

[Regulatory Basis: ORCAA Rule 8.11]

15. **Required Records.** The following records must be kept and made available when requested:

- a) The O&M plan required by condition 13;
- b) Manufacturer specifications for all cyclo-filters and baghouses as built identifying design air flow rates, pressure drops, and filtering efficiencies;
- c) Manufacturer specified or certified filtering efficiency for all silo vent filters;
- d) The number of truck dumps per day;
- e) Tons of pellets produced per day;
- f) Combustion chamber temperatures of the RTO and RCO;
- g) WESP KVA and MA of each of the three WESP fields;
- h) Number of occurrences, duration for each occurrence, and reason for emitting through either the furnace or drum dryer bypass stacks;
- i) The amount of diesel and clean, dry wood used during each cold startup;
- j) Daily record of the operating pressure drop across each baghouse and cyclo-filter;

- k) Monthly record of emissions calculations to demonstrate compliance with the emissions limits in condition 7; and,
  - l) NO<sub>x</sub> and CO CERMS certification and quality assurance records.
- [Regulatory Basis: ORCAA Rule 8.11]

- 16. Required Notifications, Reports and Applications.** The following notifications, reports, and applications must be submitted to ORCAA by the deadline specified:
- a) Any updates or revisions to the O&M plan required by condition 13 must be submitted to ORCAA for approval prior to implementing them;
  - b) Notification by phone or email message of any complaint as soon as possible but in no case later than 24 hours of receiving the complaint;
  - c) Title V Air Operating Permit (AOP) application within 12 months from commencing operation of the facility;
  - d) Notification by phone or email of any emissions through the furnace or drum dryer bypass stacks as soon as possible but in no case later than 24 hours from initiation of the event;
  - e) Notification of any excess emissions determined through the NO<sub>x</sub> or CO CERMS as soon as possible but in no case later than 24 hours from the beginning of each event; and,
  - f) Notification of any exceedances with respect to all facility-wide emission limits as soon as possible, but no later than 30 days after the end of the month during which the exceedance was discovered.

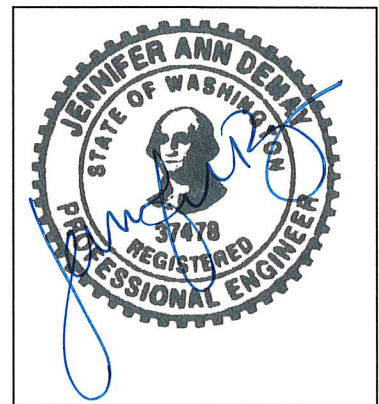
[Regulatory Basis: WAC 173-401-500; ORCAA Rule 8.11; ORCAA Rule 8.7; ORCAA Rule 5.1]

*Lauren Whybrew* 5/7/2024

PREPARED BY: Lauren Whybrew, Engineer II Date

*Jennifer DeMay* 5/9/2024

REVIEWED BY: Jennifer DeMay, PE Date



# OLYMPIC REGION CLEAN AIR AGENCY

2940 Limited Lane NW - Olympia, Washington 98502 - 360-539-7610 – Fax 360-491-6308

## FORM 1- NOTICE OF CONSTRUCTION

TO CONSTRUCT - INSTALL - ESTABLISH OR MODIFY AN AIR CONTAMINANT SOURCE

**Form 1 Instructions:**

1. Please complete all the fields below. **This NOC application is considered incomplete until signed.**
2. If the application contains any confidential business information, please complete a Request of Confidentiality of Records ([www.orcaa.org](http://www.orcaa.org)).
3. Duty to Correction Application: An applicant has the duty to supplement or correct an application. Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application must, upon becoming aware of such failure or incorrect submittal, promptly submit supplementary factors or corrected information.

Business Name: <b>Pacific Northwest Renewable Energy</b>	<b>For ORCAA use only</b> File No: <u>432</u> County No: <u>27</u> Source No: <u>926</u> Application No: <u>23 NOC 1606</u>
Mailing Address: P.O. Box 391, Sth Egrement, MA 01258	Date Received:  <div style="text-align: center; color: red; font-weight: bold;">                     Received                      JUL 20 2023                      ORCAA                 </div>
Physical Address of Project or New Source: 411 Moon Island Road, Hoquiam, WA 98550	
Billing Address: P.O. Box 391, Sth Egrement, MA 01258	
Project or Equipment to be installed/established:  Wood pellet manufacturing facility	
Anticipated startup date: <u>02</u> / <u>01</u> / <u>2025</u> Is facility currently registered with ORCAA? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
This project must meet the requirements of the State Environmental Policy Act (SEPA) before ORCAA can issue final approval. Indicate the SEPA compliance option: <input type="checkbox"/> SEPA was satisfied by _____ (government agency) on ___/___/___ (date) - Include a copy of the SEPA determination <input checked="" type="checkbox"/> SEPA threshold determination by <u>City of Hoquiam</u> (government agency) is pending - Include a copy of the environmental checklist <input type="checkbox"/> ORCAA is the only government agency requiring a permit - Include ORCAA Environmental Checklist <input type="checkbox"/> This project is exempt from SEPA per _____ (WAC citation).	
<b>Name of Owner of Business:</b> Farnese Partners, LTD  Title: <u>Owner</u>  Email: <u>pheasman@pnwrenewable.com</u> Phone: _____	<b>Agency Use Only</b>  <div style="text-align: center; font-weight: bold;">                     CONDITIONALLY APPROVED                      FOR CONSTRUCTION ONLY                      IN ACCORDANCE WITH                      RCW 70A.15, WAC 173-400                      ORCAA REGULATIONS                      (SEE ATTACHED ADDENDUM FOR                      CONDITIONS OF APPROVAL)  <u>5-14-2024</u>                      DATE  <u>Mike Schultz for</u>                      ORCAA  <u>Jeff Johnston</u> </div>
<b>Authorized Representative for Application</b> (if different than owner): Mark Boivin  Title: <u>CEO</u>  Email: <u>mboivin@pnwrenewable.com</u> Phone: <u>(413) 244-7360</u>	
I hereby certify that the information contained in this application is, to the best of my knowledge, complete and correct. <b>Signature of Owner or Authorized Representative:</b> (sign in Blue Ink)  <div style="display: flex; justify-content: space-between;"> <div style="font-family: cursive; font-size: 1.5em; color: blue;">                         MD Boivin                     </div> <div style="text-align: right;">                         Date: <u>7/20/23</u> </div> </div>	
<b>IMPORTANT:</b> Do not send via email or other electronic means. ORCAA must receive Original, hardcopy, signed application and payment prior to processing application.	