

1 BEFORE THE DEPARTMENT OF ENVIRONMENTAL QUALITY
2 OF THE STATE OF OREGON
3

4 IN THE MATTER OF) STIPULATED AGREEMENT AND
BIOMASS ONE, L.P.) FINAL ORDER
5)
6 Permittee.) ORDER NO. 15-0159

7 Permittee, Biomass One, L.P., and the Department of Environmental Quality (DEQ)
8 hereby agree that:

9 WHEREAS:

10 1. Permittee operates a biomass power plant located at 2350 Ave G in White City,
11 Oregon (the Facility).

12 2. On February 28, 1996, DEQ issued Title V Operating Permit No. 15-0159-TV-01
13 (the Permit) to Permittee.

14 3. On May 12, 2020, DEQ renewed the Permit.

15 4. The Permit authorizes Permittee to discharge air contaminants associated with its
16 operation of the Facility in conformance with the requirements, limitations, and conditions set forth
17 in the Permit.

18 5. As of December 31, 2017, the Permit had the following plant site emissions limit
19 (PSEL) for sulfur dioxide (SO₂), particulate matter of ten microns or less (PM₁₀), and nitrogen
20 oxides (NO_x), which constitute round II regional haze pollutants, *see* OAR 340-223-0020(2), at the
21 Facility: 469 tons per year for NO_x, 31 tons per year for PM₁₀ and 39 tons per year for SO₂.

22 6. The Facility is located 56.4 kilometers from Mountain Lakes Wilderness, which is
23 the nearest Class I Area, *see* OAR 340-200-0020(25), measured in a straight line from the Facility
24 to the Class I Area.

25 7. Based on the definitions and the formula in OAR 340-223-0100(2) the Facility's Q
26 value is 539; d value is 56.4, and ratio of Q divided by d is 9.6.
27

1 review of the SAFO.

2 10. In the event EPA does not accept DEQ's Round II Regional Haze State
3 Implementation Plan (SIP) in any manner that impacts the final order, implementation of the Final
4 Order shall be stayed until DEQ and the Permittee modify the Final Order in such a manner as to
5 ensure compliance with the Round II Regional Haze SIP.

6 11. This SAFO shall be binding on Permittee and its respective successors, agents, and
7 assigns. The undersigned representative of Permittee certifies that he, she, or they are fully
8 authorized to execute and bind Permittee to this SAFO. No change in ownership, corporate, or
9 partnership status of Permittee, or change in the ownership of the properties or businesses affected
10 by this SAFO shall in any way alter Permittee's obligation under this SAFO, unless otherwise
11 approved in writing by DEQ through an amendment to this SAFO.

12 12. If any event occurs that is beyond Permittee's reasonable control and that causes or
13 may cause a delay or deviation in performance of the requirements of this SAFO, Permittee must
14 immediately notify DEQ verbally of the cause of delay or deviation and its anticipated duration, the
15 measures that Permittee has or will take to prevent or minimize the delay or deviation, and the
16 timetable by which Permittee proposes to carry out such measures. Permittee shall confirm in
17 writing this information within five (5) business days of the onset of the event. It is Permittee's
18 responsibility in the written notification to demonstrate to DEQ's satisfaction that the delay or
19 deviation has been or will be caused by circumstances beyond the control and despite due diligence
20 of Permittee. If Permittee so demonstrates, DEQ may extend times of performance of related
21 activities under this SAFO as appropriate. Circumstances or events beyond Permittee's control
22 include, but are not limited to, extreme and unforeseen acts of nature, unforeseen strikes, work
23 stoppages, fires, explosion, riot, sabotage, or war. Increased cost of performance or a consultant's
24 failure to provide timely reports are not considered circumstances beyond Permittee's control.

25 13. Facsimile or scanned signatures on this SAFO shall be treated the same as original
26 signatures.

27 II. FINAL ORDER

1 The DEQ hereby enters a final order requiring Permittee to comply with the following
2 schedule and conditions:

- 3 1. By July 31, 2022, Permittee shall install CEMS to measure the emissions of NOx
4 from North Boiler and South Boiler. Permittee shall install the CEMS according to
5 the following installation, quality control, and quality assurance requirements:
- 6 a. By September 31, 2022, Permittee shall demonstrate proper installation of the
7 CEMS following EPA Procedure 1 (see 40 CFR 60, Appendix F, Procedure 1),
8 Performance Specification 2 (see 40 CFR 60, Appendix F, Performance
9 Specification 2), and DEQ Continuous Monitoring Manual, Rev. 2015.
 - 10 b. By December 31, 2022, Permittee shall submit data collected during
11 demonstrations required under Section II.1.a to DEQ for review and certification
12 of the CEMS.
 - 13 c. Upon DEQ's approval of the CEMS certification, Permittee shall use data
14 collected from the CEMS to minimize NOx operations to the extent practicable.
 - 15 d. Permittee shall collect and record all data from the NOx CEMS and make that
16 data available to DEQ upon request.
- 17 2. Within 180 days after installation of the NOx CEMS in Section II.1, Permittee shall
18 submit to DEQ a NOx optimization plan that describes Permittee's plan to use the
19 CEMS data to operate in a way that minimizes NOx emissions. Permittee will
20 implement the NOx optimization plan at all times after submitting it to DEQ.
- 21 3. If Permittee is able to finalize a new power purchase agreement (PPA), Permittee
22 shall notify DEQ in writing within 14 calendar days. Or, if no new PPA is signed,
23 Permittee shall cease operation by January 1, 2027 and request cancellation of their
24 Title V operating permit.
- 25 4. If a new PPA is signed, then no later than 180 days after notifying DEQ of the new
26 PPA, the Permittee shall submit a complete application for installation of NOx
27 reduction technology that includes selective catalytic reduction (SCR) on the North

Boiler and South Boiler or demonstrates SCR is technically infeasible or presents other unacceptable energy or non-air quality impacts. If SCR is technically infeasible or presents such other unacceptable impacts, the Permittee will propose the best available, technically feasible, and achievable NOx reduction option for DEQ's review and approval. DEQ will notify Permittee and provide Permittee with a reasonable opportunity to comment before approving a NOx reduction option in response to Permittee's application under this Section II.4.

5. Permittee shall complete installation of the controls approved by DEQ in Section II.4 within 18 months after receiving the necessary approvals from DEQ. After installation of the identified controls, Permittee will operate using those controls at all times.

BIOMASS ONE, L.P. (PERMITTEE)

8/9/2021
Date


Signature

Gregory R Blair
Name (print)

President, National Public Energy,
Inc., its Managing General Partner
Title (print)

DEPARTMENT OF ENVIRONMENTAL QUALITY and
ENVIRONMENTAL QUALITY COMMISSION

8/9/2021
Date



Ali Mirzakhali, Administrator
Air Quality Division
on behalf of DEQ pursuant to OAR 340-223-0110(2)

1 8. Because the Facility has a Title V operating permit and because the Facility has a
2 Q/d value greater than 5.00, the Facility is subject to the requirements of round II of regional haze.
3 See OAR 340-223-0100(1).

4 9. Rather than complying with OAR 340-223-0110(1), the Facility would like to enter
5 into a Stipulated Agreement with DEQ for alternative compliance with round II of regional haze
6 and would like to accept federally enforceable reductions of combined plant site emission limits of
7 round II regional haze pollutants to bring the Facility's Q/d below 5.00 which DEQ shall
8 incorporate into a Final Order. See OAR 340-223-0110(2)(b)(A).

9 I. AGREEMENT

10 1. DEQ issues this Stipulated Agreement and Final Order (SAFO) pursuant to OAR
11 340-223-0110(2)(b)(A), and it shall be effective upon the date fully executed.

12 2. The Facility is subject to round II of regional haze, according to OAR 340-223-
13 0100(1).

14 3. The Permittee agrees to and will ensure compliance with the PSEL (PM10 + NOx
15 + SO2) reductions schedule in Section II of this SAFO.

16 4. The PSEL reductions required by this SAFO shall not be banked, credited, or
17 otherwise accessed by Permittee for use in future permitting actions except Permittee may retain
18 unassigned emissions not subject to reduction pursuant to OAR 340-222-0055(3)(c).

19 5. PSELs for this Facility shall not be increased above those established in this SAFO
20 except as approved in accordance with applicable state and federal permitting regulations.

21 6. The Permittee shall calculate compliance with the PSELs in Section II of this SAFO
22 according to the requirements of the Permit.

23 7. DEQ shall incorporate this SAFO and the conditions in Section II below into the
24 Permit pursuant to OAR 340-218-0200(1)(a)(A), as applicable, or upon permit renewal.

25 8. DEQ may submit this SAFO to the Environmental Protection Agency as part of the
26 State Implementation Plan under the federal Clean Air Act.

27 9. Permittee waives any and all rights and objections Permittee may have to the form,

1 content, manner of service, and timeliness of this SAFO and to a contested case hearing and judicial
2 review of the SAFO.

3 10. In the event EPA does not accept DEQ's Round II Regional Haze State
4 Implementation Plan (SIP) in any manner that impacts the final order, implementation of the Final
5 Order shall be stayed until DEQ and the Permittee modify the Final Order in such a manner as to
6 ensure compliance with the Round II Regional Haze SIP.

7 11. This SAFO shall be binding on Permittee and its respective successors, agents, and
8 assigns. The undersigned representative of Permittee certifies that he, she, or they are fully
9 authorized to execute and bind Permittee to this SAFO. No change in ownership, corporate, or
10 partnership status of Permittee, or change in the ownership of the properties or businesses affected
11 by this SAFO shall in any way alter Permittee's obligation under this SAFO, unless otherwise
12 approved in writing by DEQ through an amendment to this SAFO.

13 12. If any event occurs that is beyond Permittee's reasonable control and that causes or
14 may cause a delay or deviation in performance of the requirements of this SAFO, Permittee must
15 immediately notify DEQ verbally of the cause of delay or deviation and its anticipated duration, the
16 measures that Permittee has or will take to prevent or minimize the delay or deviation, and the
17 timetable by which Permittee proposes to carry out such measures. Permittee shall confirm in
18 writing this information within five (5) business days of the onset of the event. It is Permittee's
19 responsibility in the written notification to demonstrate to DEQ's satisfaction that the delay or
20 deviation has been or will be caused by circumstances beyond the control and despite due diligence
21 of Permittee. If Permittee so demonstrates, DEQ may extend times of performance of related
22 activities under this SAFO as appropriate. Circumstances or events beyond Permittee's control
23 include, but are not limited to, extreme and unforeseen acts of nature, unforeseen strikes, work
24 stoppages, work interference caused by pandemic, fires, explosion, riot, sabotage, or war. Increased
25 cost of performance or a consultant's failure to provide timely reports are not considered
26 circumstances beyond Permittee's control.

27 13. Facsimile or scanned signatures on this SAFO shall be treated the same as original

1 signatures.

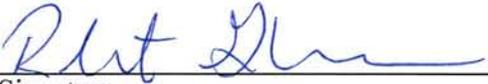
2 II. FINAL ORDER

3 The DEQ hereby enters a final order requiring Permittee to comply with the following
4 schedule and conditions:

- 5 1. The Permittee shall comply with the PSELs according to the following schedule:
- 6 a. From August 1, 2021, to July 31, 2023, the Permittee's PSELs for the following
7 pollutants are:
- 8 i. 396 tons for PM10 + NOx + SO2.(Q/d = 6.53).
- 9 b. From August 1, 2023, to July 31, 2024, the Permittee's PSELs for the following
10 pollutants are:
- 11 i. 381 tons for PM10 + NOx + SO2 (Q/d = 6.29).
- 12 c. From On August 1, 2024, to July 31, 2025 the Permittee's PSELs for the
13 following pollutants are:
- 14 i. 365 tons for PM10 + NOx + SO2 (Q/d = 6.03) .
- 15 d. From August 1, 2025, to July 31, 2026 the Permittee's PSELs for the following
16 pollutants are:
- 17 i. 347 tons for PM10 + NOx + SO2 (Q/d = 5.73).
- 18 e. On August 1, 2026, the Permittee's PSELs for the following pollutants are:
19 i. 302 tons for PM10 + NOx + SO2 (Q/d = 4.99).

20 BOISE CASCADE WOOD PRODUCTS, LLC.
21 (PERMITTEE)

22 August 9, 2021
23 Date

22 
23 Signature

23 Robert Glover
24 Name (print)

24 Region Manager - Boise Cascade
25 Title (print)

26
27 DEPARTMENT OF ENVIRONMENTAL QUALITY and
ENVIRONMENTAL QUALITY COMMISSION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

8/9/2021

Date



Ali Mirzakhali, Administrator
Air Quality Division
on behalf of DEQ pursuant to OAR 340-223-0110(2)

1 BEFORE THE DEPARTMENT OF ENVIRONMENTAL QUALITY
2 OF THE STATE OF OREGON
3

4 IN THE MATTER OF) STIPULATED AGREEMENT AND
Cascade Tissue Group – Oregon, a division) FINAL ORDER
5 of Cascades Holding US Inc.)
6 Permittee.) ORDER NO. 05-1849
7

8 Permittee, Cascade Tissue Group – Oregon, a division of Cascades Holding US Inc.,
9 and the Department of Environmental Quality (DEQ) hereby agree that:

10 WHEREAS:

- 11 1. Permittee operates a paper mill located at 1300 Kaster Road, Saint Helens, Oregon
(the Facility).
12
13 2. On July 1, 1996, DEQ issued Title V Operating Permit No. 05-1849-TV-02 (the
Permit) to Permittee.
14
15 3. On April 6, 2018, DEQ renewed the Permit.
16
17 4. The Permit authorizes Permittee to discharge air contaminants associated with its
operation of the Facility in conformance with the requirements, limitations, and conditions set forth
18 in the Permit.
19
20 5. As of December 31, 2017, the Permit had the following plant site emissions limit
(PSEL) for sulfur dioxide (SO₂), particulate matter of ten microns or less (PM₁₀), and nitrogen
21 oxides (NO_x), which constitute round II regional haze pollutants, *see* OAR 340-223-0020(2) at the
Facility: 3400 tons per year for SO₂, 738 tons per year for PM₁₀ and 1449 tons per year for NO_x.
22
23 6. Upon renewal, issued April 6, 2018, the Permit was modified to reduce the PSELs to
39 tons per year for SO₂, 14 tons per year for PM₁₀ and 103 tons per year for NO_x, and the Permit
24 included condition 23, which documented the following unassigned emissions: 3322 tons for SO₂,
25 739 tons for PM 10, and 1386 tons for NO_x.
26
27

1 7. DEQ shall incorporate this SAFO and the conditions in Section II below into the
2 Permit pursuant to OAR 340-218-0200(1)(a)(A), if applicable, or upon permit renewal.

3 8. DEQ may submit this SAFO to the Environmental Protection Agency as part of the
4 State Implementation Plan under the federal Clean Air Act.

5 9. Permittee waives any and all rights and objections Permittee may have to the form,
6 content, manner of service, and timeliness of this SAFO and to a contested case hearing and judicial
7 review of the SAFO.

8 10. In the event EPA does not accept DEQ's Round II Regional Haze State
9 Implementation Plan (SIP) in any manner that impacts the final order, implementation of the Final
10 Order shall be stayed until DEQ and the Permittee modify the Final Order in such a manner as to
11 ensure compliance with the Round II Regional Haze SIP.

12 11. This SAFO shall be binding on Permittee and its respective successors, agents, and
13 assigns. The undersigned representative of Permittee certifies that he, she, or they are fully
14 authorized to execute and bind Permittee to this SAFO. No change in ownership, corporate, or
15 partnership status of Permittee, or change in the ownership of the properties or businesses affected
16 by this SAFO shall in any way alter Permittee's obligation under this SAFO, unless otherwise
17 approved in writing by DEQ through an amendment to this SAFO.

18 12. If any unforeseen event occurs that is beyond Permittee's reasonable control and that
19 causes or may cause a delay or deviation in performance of the requirements of this SAFO,
20 Permittee must immediately notify DEQ verbally of the cause of delay or deviation and its
21 anticipated duration, the measures that Permittee has or will take to prevent or minimize the delay or
22 deviation, and the timetable by which Permittee proposes to carry out such measures. Permittee
23 shall confirm in writing this information within five (5) business days of the onset of the event. It is
24 Permittee's responsibility in the written notification to demonstrate to DEQ's satisfaction that the
25 delay or deviation has been or will be caused by circumstances beyond the control and despite due
26 diligence of Permittee. If Permittee so demonstrates, DEQ may extend times of performance of
27 related activities under this SAFO as appropriate. Circumstances or events beyond Permittee's

1 control include, but are not limited to, extreme and unforeseen acts of nature, unforeseen strikes,
2 work stoppages, fires, explosion, riot, sabotage, or war. Increased cost of performance or a
3 consultant's failure to provide timely reports are not considered circumstances beyond Permittee's
4 control.

5 13. Facsimile or scanned signatures on this SAFO shall be treated the same as original
6 signatures.

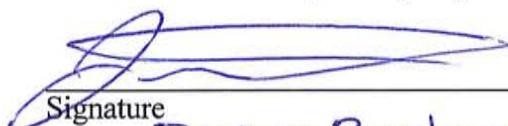
7 II. FINAL ORDER

8 The DEQ hereby enters a final order requiring Permittee to comply with the following
9 schedule and conditions:

- 10 1. The Permittee shall comply with the PSELs according to the following schedule:
11 a. On August 1, 2022, the Permittee's PSELs for the following pollutants are:
12 i. 39 tons per year for SO₂, 14 tons per year for PM₁₀ and 103 tons per
13 year for NO_x.
14 2. Unassigned emissions for SO₂, PM₁₀, and NO_x will be set to 0.

15 Cascade Tissue Group - Oregon (PERMITTEE)

16
17 8/18/2021
18 Date

19 
20 Signature
21 Jonathan Bouchard
22 Name (print)
23 Plant Manager
24 Title (print)

25 DEPARTMENT OF ENVIRONMENTAL QUALITY and
26 ENVIRONMENTAL QUALITY COMMISSION

27 8/18/2021
Date


Ali Mirzakhali, Administrator
Air Quality Division
on behalf of DEQ pursuant to OAR 340-223-0110(2)

1 9. Permittee waives any and all rights and objections Permittee may have to the form,
2 content, manner of service, and timeliness of this SAFO and to a contested case hearing and judicial
3 review of the SAFO.

4 10. In the event EPA does not accept DEQ's Round II Regional Haze State
5 Implementation Plan (SIP) in any manner that impacts the final order, implementation of the Final
6 Order shall be stayed until DEQ and the Permittee modify the Final Order in such a manner as to
7 ensure compliance with the Round II Regional Haze SIP.

8 11. This SAFO shall be binding on Permittee and its respective successors, agents, and
9 assigns. The undersigned representative of Permittee certifies that he, she, or they are fully
10 authorized to execute and bind Permittee to this SAFO. No change in ownership, corporate or
11 partnership status of Permittee, or change in the ownership of the properties or businesses affected
12 by this SAFO shall in any way alter Permittee's obligation under this SAFO, unless otherwise
13 approved in writing by DEQ through an amendment to this SAFO.

14 12. If any unforeseen event occurs that is beyond Permittee's reasonable control and that
15 causes or may cause a delay or deviation in performance of the requirements of this SAFO,
16 Permittee must immediately notify DEQ verbally of the cause of delay or deviation and its
17 anticipated duration, the measures that Permittee has or will take to prevent or minimize the delay or
18 deviation, and the timetable by which Permittee proposes to carry out such measures. Permittee
19 shall confirm in writing this information within five (5) business days of the onset of the event. It is
20 Permittee's responsibility in the written notification to demonstrate to DEQ's satisfaction that the
21 delay or deviation has been or will be caused by circumstances beyond the control, unforeseen, and
22 despite due diligence of Permittee. If Permittee so demonstrates, DEQ may extend times of
23 performance of related activities under this SAFO as appropriate. Circumstances or events beyond
24 Permittee's control include, but are not limited to, extreme and unforeseen acts of nature, unforeseen
25 strikes, work stoppages, fires, explosion, riot, sabotage, or war. Increased cost of performance or a
26 consultant's failure to provide timely reports are not considered circumstances beyond Permittee's
27 control.

1 13. Facsimile or scanned signatures on this SAFO shall be treated the same as original
2 signatures.

3 II. FINAL ORDER

4 DEQ hereby enters a final order requiring Permittee to comply with the following schedule
5 and conditions:

- 6 1. By December 31, 2024, Permittee shall, at a minimum, install low NOx burners on
7 the pre-heat portions of EU-10 Reheat Furnace with a designed NOx emission factor
8 of 170 pounds per million cubic feet of natural gas.
- 9 2. During 2025, the Permittee shall conduct an initial NOx source testing campaign on
10 EU-10 Reheat Furnace to verify the designed NOx emission factor.
 - 11 a. The initial NOx source testing campaign shall consist of quarterly source testing
12 on EU-10 Reheat Furnace to verify the designed NOx emission factor. Each
13 quarterly source test shall consist of a minimum of three (3) test runs, using EPA
14 Reference Method 7E.
- 15 3. Within 90 days of completing the initial NOx source testing campaign, the Permittee
16 shall submit a report to DEQ that includes the source testing results, and proposes a
17 new NOx emission factor for EU-10 Reheat Furnace.
 - 18 a. DEQ will review Permittee's report provided under this section and determine
19 the appropriate NOx emissions factor for the EU-10 Reheat Furnace. DEQ will
20 notify the Permittee and provide opportunity to discuss the emissions factor.
 - 21 b. After consultation with the Permittee, DEQ will calculate the new potential to
22 emit (PTE) from EU-10 Reheat Furnace using the new NOx emission factor
23 determined under this section. DEQ will adjust Permittee's NOx PSEL in its
24 permit to account for the revised PTE, either pursuant to OAR 340-218-
25 0200(1)(a)(A), as applicable, or upon permit renewal.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

EVRAZ Inc. NA (PERMITTEE)

8-9-2021
Date


Signature
DON HUNTER
Name (print)
SR. VICE PRESIDENT - PORTLAND B.U.
Title (print)

DEPARTMENT OF ENVIRONMENTAL QUALITY and
ENVIRONMENTAL QUALITY COMMISSION

8/9/2021
Date


Ali Mirzakhali, Administrator
Air Quality Division
on behalf of DEQ pursuant to OAR 340-223-0110(2)

BEFORE THE DEPARTMENT OF ENVIRONMENTAL QUALITY
OF THE STATE OF OREGON

IN THE MATTER OF) STIPULATED AGREEMENT AND
Gas Transmission Northwest LLC) FINAL ORDER
Compressor Station #12)
Permittee.) ORDER NO. 09-0084

Permittee, Gas Transmission Northwest LLC, and the Department of Environmental
Quality (DEQ) hereby agree that:

WHEREAS:

1. Permittee operates a natural gas compressor station located at US Highway 97, 19 miles south of Bend in Bend, Oregon (the Facility).
2. On July 9, 1996, DEQ issued Title V Operating Permit No. 09-0084-TV-01 (the Permit) to Permittee.
3. On August 10, 2017, DEQ renewed the Permit.
4. The Permit authorizes Permittee to discharge air contaminants associated with its operation of the Facility in conformance with the requirements, limitations, and conditions set forth in the Permit.
5. As of December 31, 2017, the Permit had the following plant site emissions limit (PSEL) for sulfur dioxide (SO2), particulate matter of ten microns or less (PM10), and nitrogen oxides (NOx), which constitute round II regional haze pollutants, *see* OAR 340-223-0020(2) at the Facility: 39 tons per year for SO2, 14 tons per year for PM 10, and 377 tons per year for NOx.
6. The Facility is located 30.4 kilometers from the Three Sisters Wilderness Area, which is the nearest Class I Area, *see* OAR 340-200-0020(25), measured in a straight line from the Facility to the Class I Area.
7. Based on the definitions and the formula in OAR 340-223-0100(2) the Facility's Q value is 430; d value is 30.4, and ratio of Q divided by d is 14.1.

1 8. Because the Facility has a Title V operating permit and because the Facility has a
2 Q/d value of greater than 5.00, the Facility is subject to the requirements of round II of regional
3 haze. *See* OAR 340-223-0100(1).

4 9. Rather than complying with OAR 340-223-0110(1), the Facility would like to enter
5 into a Stipulated Agreement with DEQ for alternative compliance with round II of regional haze
6 and would like to accept federally enforceable reductions of combined plant site emission limits of
7 round II regional haze pollutants to bring the Facility's Q/d below 5.00 which DEQ shall
8 incorporate into a Final Order. *See* OAR 340-223-0110(2)(b)(A).

9 I. AGREEMENT

10 1. DEQ issues this Stipulated Agreement and Final Order (SAFO) pursuant to OAR
11 340-223-0110(2)(b)(A), and it shall be effective upon the date fully executed.

12 2. The Facility is subject to round II of regional haze, according to OAR 340-223-
13 0100(1).

14 3. The Permittee agrees to and will ensure compliance with the PSEL reductions
15 schedule in Section II of this SAFO.

16 4. The PSEL reductions required by this SAFO shall not be banked, credited, or
17 otherwise accessed by Permittee for use in future permitting actions.

18 5. PSELs for this Facility shall not exceed the limits established in this SAFO except
19 as approved in accordance with applicable state and federal permitting regulations.

20 6. The Permittee shall calculate compliance with the PSELs in Section II of this SAFO
21 according to the requirements of the Permit.

22 7. DEQ shall incorporate this SAFO and the conditions in Section II below into the
23 Permit pursuant to 340-218-0200(1)(a)(A), if applicable, or upon permit renewal.

24 8. DEQ may submit this SAFO to the Environmental Protection Agency as part of the
25 State Implementation Plan under the federal Clean Air Act.

26 9. Permittee waives any and all rights and objections Permittee may have to the form,
27 content, manner of service, and timeliness of this SAFO and to a contested case hearing and judicial

1 review of the SAFO.

2 10. In the event EPA does not accept DEQ's Round II Regional Haze State
3 Implementation Plan (SIP) in any manner that impacts the final order, implementation of the Final
4 Order shall be stayed until DEQ and the Permittee shall negotiate modifications to the Final Order
5 in such a manner as to ensure compliance with the Round II Regional Haze SIP.

6 11. This SAFO shall be binding on Permittee and its respective successors, agents, and
7 assigns. The undersigned representative of Permittee certifies that he, she, or they are fully
8 authorized to execute and bind Permittee to this SAFO. No change in ownership, corporate, or
9 partnership status of Permittee, or change in the ownership of the properties or businesses affected
10 by this SAFO shall in any way alter Permittee's obligation under this SAFO, unless otherwise
11 approved in writing by DEQ through an amendment to this SAFO.

12 12. If any event occurs that is beyond Permittee's reasonable control and that causes a
13 deviation in performance of the requirements of this SAFO, Permittee must notify DEQ as soon as
14 possible via email and follow up with a phone call providing verbally the cause of delay or
15 deviation and its anticipated duration, the measures that Permittee has or will take to prevent or
16 minimize the delay or deviation, and the timetable by which Permittee proposes to carry out such
17 measures. Permittee shall confirm in writing this information within five (5) business days of the
18 onset of the event. It is Permittee's responsibility in the written notification to demonstrate that the
19 delay or deviation has been caused by circumstances beyond the control and despite due diligence
20 of Permittee. If Permittee so demonstrates, DEQ may extend times of performance of related
21 activities under this SAFO as appropriate. Circumstances or events beyond Permittee's control
22 include, but are not limited to, extreme and unforeseen acts of nature, unforeseen strikes, work
23 stoppages, fires, explosion, riot, sabotage, or war. Increased cost of performance or a consultant's
24 failure to provide timely reports are not considered circumstances beyond Permittee's control.

25 13. Facsimile or scanned signatures on this SAFO shall be treated the same as original
26 signatures.

27

II. FINAL ORDER

The DEQ hereby enters a final order requiring Permittee to comply with the following schedule and conditions:

1. The Permittee shall comply with the PSELS according to the following schedule:

a. On August 1, 2022, the Permittee’s PSELS for the following pollutants are:

i. 12.7 tons per year for PM10; 317.1 tons per year for NOx; and 30.4 tons per year for SO2.

b. On August 1, 2023, the Permittee’s PSELS for the following pollutants are:

i. 11.4 tons per year for PM10; 257.2 tons per year for NOx; and 21.7 tons per year for SO2.

c. On August 1, 2024, the Permittee’s PSELS for the following pollutants are:

i. 10.2 tons per year for PM10; 197.3 tons per year for NOx; and 13.1 tons per year for SO2.

d. On August 1, 2025, the Permittee’s PSELS for the following pollutants are:

i. 8.9 tons per year for PM10; 137.4 tons per year for NOx; and 4.4 tons per year for SO2.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

GAS TRANSMISSION NORTHWEST LLC
(PERMITTEE)

August 9, 2021

Date

By: DocuSigned by:
John McWilliams
05C9C56BD05546D...

John J. McWilliams, Vice-President

DS
JH

By: DocuSigned by:
Emily Strait
7BE179CD86FB4C0

Emily L. Strait, Assistant Secretary

DEPARTMENT OF ENVIRONMENTAL QUALITY and
ENVIRONMENTAL QUALITY COMMISSION

August 9, 2021

Date

DocuSigned by:
Ali Mirzakhali
7895034861B1468

Ali Mirzakhali, Administrator
Air Quality Division
on behalf of DEQ pursuant to OAR 340-223-0110(2)

1 BEFORE THE DEPARTMENT OF ENVIRONMENTAL QUALITY
2 OF THE STATE OF OREGON

3)
4 IN THE MATTER OF) STIPULATED AGREEMENT AND
Georgia-Pacific Toledo LLC) FINAL ORDER
5 Toledo)
6 Permittee.) ORDER NO. 21-0005

7 Permittee, Georgia-Pacific Toledo LLC, and the Department of Environmental Quality
8 (DEQ) hereby agree that:

9 WHEREAS:

10 1. Permittee operates a pulp and paper mill located at 1400 SE Butler Bridge Road in
11 Toledo, Oregon (the Facility).

12 2. On July 1, 1997, DEQ issued Title V Operating Permit No. 21-0005-TV-01 (the
13 Permit) to Permittee.

14 3. On September 9, 2016, DEQ issued the most recent renewal Permit.

15 4. The Permit authorizes Permittee to discharge air contaminants associated with its
16 operation of the Facility in conformance with the requirements, limitations, and conditions set forth
17 in the Permit.

18 5. As of December 31, 2017, the Permit had the following plant site emissions limit
19 (PSEL) for sulfur dioxide (SO₂), particulate matter of ten microns or less (PM₁₀), and nitrogen
20 oxides (NO_x), which constitute round II regional haze pollutants, see OAR 340-223-0020(2): 437
21 tons per year for SO₂, 311 tons per year for PM₁₀, and 1343 tons per year for NO_x.

22 6. The Facility is located 147.0 kilometers from Three Sisters Wilderness, which is the
23 nearest Class I Area, *see* OAR 340-200-0020 (25), measured in a straight line from the Facility to
24 the Class I Area.

25 7. Based on the definitions and the formula in OAR 340-223-0100(2), the Facility's Q
26 value is 2091; d value is 147.0, and ratio of Q divided by d is 14.2.

1 8. DEQ may submit this SAFO to the Environmental Protection Agency (EPA) as part
2 of the State Implementation Plan.

3 9. Permittee waives any and all rights and objections Permittee may have to the form,
4 content, manner of service, and timeliness of this SAFO and to a contested case hearing and judicial
5 review of the SAFO.

6 10. In the event EPA does not accept DEQ's Round II Regional Haze State
7 Implementation Plan (SIP) in any manner that impacts the final order, implementation of the Final
8 Order shall be stayed until DEQ and the Permittee modify the Final Order in such a manner as to
9 ensure compliance with the Round II Regional Haze SIP. In the event that EPA has disapproved
10 DEQ's Round II Regional Haze SIP and promulgates a Round II Regional Haze federal
11 implementation plan, this agreement will be void.

12 11. Permittee releases and waives any and all claims of any kind, known or unknown,
13 past or future, against the State of Oregon or its agencies, instrumentalities, employees, officers, or
14 agents, arising out of the matters and events relating to the matter set out in this SAFO. Any and all
15 claims includes but is not limited to any claim under 42 USC § 1983 et seq., any claim under federal
16 or state law for damages, declaratory, or equitable relief, and any claim for attorneys fees or costs.

17 12. This SAFO shall be binding on Permittee and its respective successors, agents, and
18 assigns. The undersigned representative of Permittee certifies that he, she, or they are fully
19 authorized to execute and bind Permittee to this SAFO. No change in ownership, corporate or
20 partnership status of Permittee, or change in the ownership of the properties or businesses affected
21 by this SAFO shall in any way alter Permittee's obligation under this SAFO, unless otherwise
22 approved in writing by DEQ through an amendment to this SAFO.

23 13. If any unforeseeable event occurs that is beyond Permittee's reasonable control and
24 that causes or may cause a delay or deviation in performance of the requirements of this SAFO,
25 Permittee must immediately notify DEQ verbally of the cause of delay or deviation and its
26 anticipated duration, the measures that Permittee has or will take to prevent or minimize the delay or
27 deviation, and the timetable by which Permittee proposes to carry out such measures. Permittee

1 shall confirm in writing this information within five working days of the onset of the event. It is
2 Permittee's responsibility in the written notification to demonstrate to DEQ's satisfaction that the
3 delay or deviation has been or will be caused by circumstances beyond the control, unforeseen, and
4 despite due diligence of Permittee. If Permittee so demonstrates, DEQ may extend times of
5 performance of related activities under this SAFO as appropriate. Circumstances or events beyond
6 Permittee's control include, but are not limited to, extreme and unforeseen acts of nature, unforeseen
7 strikes, work stoppages, fires, explosion, riot, sabotage, unforeseen delays in issuance of any
8 required permits by DEQ that are beyond the Permittee's control, or war. Increased cost of
9 performance or a consultant's failure to provide timely reports are not considered circumstances
10 beyond Permittee's control.

11 14. Facsimile or scanned signatures on this SAFO shall be treated the same as original
12 signatures.

13 15. The obligations and requirements in this SAFO may be revised at Permittee's
14 request, e.g., to authorize different but equivalent emission reductions or controls, if DEQ approves
15 such proposed revisions in writing through an amendment to this SAFO.

16 II. FINAL ORDER

17 DEQ hereby enters a final order requiring Permittee to comply with the following schedule
18 and conditions:

- 19 1. For the EU-11 No. 4 Boiler, EU-13 No. 1 Boiler, and EU-18 No. 3 Boiler:
- 20 a. Permittee shall either complete a NOx reduction project that includes the
21 installation of low NOx burners, flue gas recirculation and continuous emissions
22 monitoring system (CEMS) on the three Boilers, EU-11, EU-13, and EU-18, or
23 replace the boilers with one or more new boilers.
- 24 i. Permittee shall determine whether to complete the NOx reduction project
25 or replace the boilers by July 31, 2022 and shall meet with DEQ by
26 December 31, 2022 to discuss the technical details of the selected project
27 to determine what permitting Permittee shall need prior to construction.

1 Permittee and DEQ shall agree to a timeline for permitting of
2 construction project in the meeting, including required deadlines for
3 submittal of a complete approvable permit application.

4 ii. If Permittee chooses to complete a NOx reduction project:

- 5 1. By July 31, 2026, Permittee shall install low NOx burners and
6 flue gas recirculation on EU-11, EU-13, and EU-18 in order to
7 achieve an emissions rate no greater than 0.09 lb/MMBtu on a
8 seven day rolling basis. This deadline shall be extended if, in
9 response to a complete application submitted by Permittee in
10 accordance with the timeline established under Section II.2.a.i,
11 DEQ does not provide construction approval on a timely basis.
- 12 2. As expeditiously as practicable, but not later than July 31, 2026,
13 Permittee shall install a CEMS to measure the emissions of NOx
14 from EU-11, EU-13, and EU-18. Permittee shall install the
15 CEMS according to the installation, quality control, and quality
16 assurance requirements detailed in the following:
- 17 3. Permittee shall demonstrate proper installation of the CEMS
18 following EPA Procedure 1 (see 40 CFR 60, Appendix F,
19 Procedure 1), Performance Specification 2 (see 40 CFR 60,
20 Appendix B, Performance Specification 2), and DEQ Source
21 Sampling Manual, Rev. 2018.
- 22 4. Permittee shall submit data collected during demonstrations to
23 DEQ for review and to determine if the CEMS was installed
24 correctly and meets the identified quality assurance criteria.
- 25 5. Upon DEQ's approval of the CEMS certification, Permittee shall
26 use data collected from the CEMS to demonstrate compliance
27

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

with the applicable NOx PSEL listed in Section II, paragraph 1 above.

6. Permittee shall collect and record all data from the NOx CEMS and make that data available to DEQ upon request.

iii. If Permittee chooses to replace EU-11, EU-13, and EU-18:

1. PSELS for round II regional haze pollutants incorporated in the Permit for the replacement shall be no more than the potential to emit of the replacement, or a Q of 889 tons per year of NOx, 437 tons per year of SO2, and 311 tons per year of PM10, whichever is lower.

2. Permittee shall complete the replacement of the EU-11, EU-13, and EU-18 with new technology no later than July 31, 2031. This deadline shall be extended if, in response to a complete approvable application submitted by Permittee in accordance with the timeline established under Section II.1.a.i, DEQ does not provide construction approval on a timely basis.

3. The Permittee shall not operate EU-11, EU-13, and EU-18 after July 31, 2031.

Georgia-Pacific Toledo LLC (PERMITTEE)

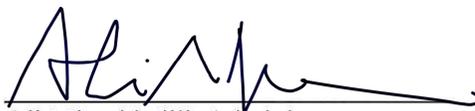
8/9/21
Date

Jeremy Ness
Signature
Jeremy Ness
Name (print)
VP Mill Manager
Title (print)

DEPARTMENT OF ENVIRONMENTAL QUALITY and
ENVIRONMENTAL QUALITY COMMISSION

8/9/2021

Date



Ali Mirzakhali, Administrator

Air Quality Division

on behalf of DEQ pursuant to OAR 340-223-0110(2)

1 BEFORE THE DEPARTMENT OF ENVIRONMENTAL QUALITY

2 OF THE STATE OF OREGON

3)
4 IN THE MATTER OF) STIPULATED AGREEMENT AND
Georgia-Pacific Consumer Operations LLC) FINAL ORDER
5 Wauna Mill,)
6 Permittee.) ORDER NO. 04-0004

7 Permittee, Georgia-Pacific Consumer Operations LLC, and the Department of
8 Environmental Quality (DEQ) hereby agree that:

9 WHEREAS:

10 1. Permittee operates a pulp and paper mill located at 92326 Taylorville Road in
11 Clatskanie, Oregon (the Facility).

12 2. On January 2, 1996, DEQ issued Title V Operating Permit No. 04-0004-TV-01 (the
13 Permit) to Permittee.

14 3. On June 18, 2009, DEQ renewed the Permit, and on December 2, 2010, DEQ issued
15 the current permit.

16 4. The Permit authorizes Permittee to discharge air contaminants associated with its
17 operation of the Facility in conformance with the requirements, limitations, and conditions set forth
18 in the Permit.

19 5. As of December 31, 2017, the Permit had the following plant site emissions limit
20 (PSEL) for sulfur dioxide (SO₂), particulate matter of ten microns or less (PM₁₀), and nitrogen
21 oxides (NO_x), which constitute round II regional haze pollutants, *see* OAR 340-223-0020(2): 913
22 tons per year for SO₂, 1,077 tons per year for PM₁₀, and 2,139 tons per year for NO_x.

23 6. The Facility is located 131.17 kilometers from Mount Rainer National Park, which
24 is the nearest Class I Area, *see* OAR 340-200-0020 (25), measured in a straight line from the
25 Facility to the Class I Area.

26 7. Based on the definitions and the formula in OAR 340-223-0100(2), the Facility's Q
27 value is 4129; d value is 131.17, and ratio of Q divided by d is 31.48.

1 8. Because the Facility has a Title V operating permit and because the Facility has a
2 Q/d value of greater than 5.00, the Facility is subject to the requirements of round II of regional
3 haze. *See* OAR 340-223-0100(1).

4 9. In accordance with OAR 340-223-0110(1), the Facility submitted a four factor
5 analysis demonstrating that many identified emission unit/control combinations are not cost
6 effective. Rather than agreeing to install all emission unit/control combinations determined to be
7 cost effective by DEQ, the Facility would like to enter into a Stipulated Agreement with DEQ for
8 alternative compliance with round II of regional haze and would like to accept a federally
9 enforceable requirement to install controls and associated monitoring equipment, and to accept
10 emission limitations to reduce round II regional haze pollutants from the Facility which DEQ shall
11 incorporate into a Final Order. *See* OAR 340-223-0110(2).

12 I. AGREEMENT

13 1. DEQ issues this Stipulated Agreement and Final Order (SAFO) pursuant to OAR
14 340-223-0110(2), and it shall be effective upon the date fully executed.

15 2. The Facility is subject to round II of regional haze, according to OAR 340-223-
16 0100(1).

17 3. The Permittee agrees to and will ensure compliance with the PSEL reductions,
18 emission limits, controls, monitoring requirements, schedules, and conditions in Section II of this
19 SAFO.

20 4. The reductions in PSELs required by this SAFO shall not be banked, credited, or
21 otherwise accessed by Permittee for use in future permitting actions.

22 5. PSELs for this Facility shall not be increased above those established in this SAFO
23 except as approved in accordance with applicable state and federal permitting regulations.

24 6. The Permittee shall calculate compliance with the PSELs in Section II of this SAFO
25 according to the requirements of the Permit.

26 7. DEQ shall incorporate this SAFO and the conditions in Section II below into the
27 Permit pursuant to OAR 340-218-0200(1)(a)(A) or upon permit renewal, whichever is sooner.

1 8. DEQ may submit this SAFO to the Environmental Protection Agency (EPA) as part
2 of the State Implementation Plan.

3 9. Permittee waives any and all rights and objections Permittee may have to the form,
4 content, manner of service, and timeliness of this SAFO and to a contested case hearing and judicial
5 review of the SAFO.

6 10. In the event EPA does not accept DEQ's Round II Regional Haze State
7 Implementation Plan (SIP) in any manner that impacts the final order, implementation of the Final
8 Order shall be stayed until DEQ and the Permittee modify the Final Order in such a manner as to
9 ensure compliance with the Round II Regional Haze SIP. In the event that EPA has disapproved
10 DEQ's Round II Regional Haze SIP and promulgates a Round II Regional Haze federal
11 implementation plan, this agreement will be void.

12 11. This SAFO shall be binding on Permittee and its respective successors, agents, and
13 assigns. The undersigned representative of Permittee certifies that he, she, or they are fully
14 authorized to execute and bind Permittee to this SAFO. No change in ownership, corporate or
15 partnership status of Permittee, or change in the ownership of the properties or businesses affected
16 by this SAFO shall in any way alter Permittee's obligation under this SAFO, unless otherwise
17 approved in writing by DEQ through an amendment to this SAFO.

18 12. If any unforeseeable event occurs that is beyond Permittee's reasonable control and
19 that causes or may cause a delay or deviation in performance of the requirements of this SAFO,
20 Permittee must immediately notify DEQ verbally of the cause of delay or deviation and its
21 anticipated duration, the measures that Permittee has or will take to prevent or minimize the delay or
22 deviation, and the timetable by which Permittee proposes to carry out such measures. Permittee
23 shall confirm in writing this information within five working days of the onset of the event. It is
24 Permittee's responsibility in the written notification to demonstrate to DEQ's satisfaction that the
25 delay or deviation has been or will be caused by circumstances beyond the control, unforeseen, and
26 despite due diligence of Permittee. If Permittee so demonstrates, DEQ may extend times of
27 performance of related activities under this SAFO as appropriate. Circumstances or events beyond

1 Permittee's control include, but are not limited to, extreme and unforeseen acts of nature, unforeseen
2 strikes, work stoppages, fires, explosion, riot, sabotage, unforeseen delays in issuance of any
3 required permits by DEQ that are beyond the Permittee's control, or war. Increased cost of
4 performance or a consultant's failure to provide timely reports are not considered circumstances
5 beyond Permittee's control.

6 13. Facsimile or scanned signatures on this SAFO shall be treated the same as original
7 signatures.

8 14. The obligations and requirements in this SAFO may be revised at Permittee's
9 request, e.g., to authorize different but equivalent emission reductions or controls, if DEQ approves
10 such proposed revisions in writing through an amendment to this SAFO.

11 II. FINAL ORDER

12 DEQ hereby enters a final order requiring Permittee to comply with the following schedule
13 and conditions:

- 14 1. Permittee shall comply with the PSELs according to the following schedule :
- 15 a. On August 1, 2022, Permittee's PSELs shall incorporate the changes listed in
16 II.3. and, for the following pollutants, are:
- 17 i. For PM10, the PSEL shall be 1,077 tons;
18 ii. For NOx, the PSEL shall be 2,019 tons; and
19 iii. For SO2, the PSEL shall be 913 tons.
- 20 b. On December 31, 2024, the Permittee's PSELs shall incorporate the changes
21 listed in II.2 and II.3. and, for the following pollutants, are:
- 22 i. For PM10, the PSEL shall be 1,077 tons;
23 ii. For NOx, the PSEL shall be 1,999 tons; and
24 iii. For SO2, the PSEL shall be 913 tons.
- 25 c. On July 31, 2026, the Permittee's PSELs shall incorporate the changes listed in
26 II.2., II.3., and II.4. and, for the following pollutants, are:
- 27 i. For PM10, the PSEL shall be 1,077 tons;

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

- ii. For NO_x, the PSEL shall be 1,413 tons; and
- iii. For SO₂, the PSEL shall be 913 tons.
- 2. For Paper Machine 5: Yankee Burner:
 - a. By December 31, 2024, Permittee shall replace the existing Yankee burner with a low NO_x burner to achieve an emissions rate no greater than 0.03 lb/MMBtu and shall use this emission rate for calculating compliance with PSELs.
 - b. Permittee shall demonstrate compliance with the PSEL through performance testing following EPA Test Method 7E (see 40 CFR Part 60, Appendix A-4), or an alternate test method approved by DEQ, and shall comply with DEQ Source Sampling Manual, Rev. 2018.
 - c. Permittee shall demonstrate compliance through performance testing within one calendar year after the project is fully executed.
- 3. For Paper Machine 6: TAD1 Burner and TAD2 Burner, Paper Machine 7: TAD1 Burner and TAD 2 Burner:
 - a. Permittee shall have a NO_x emissions rate no greater than 0.06 lb/MMBtu for each emissions point and shall use this emission rate for calculating compliance with PSELs.
 - b. Permittee shall demonstrate compliance with PSEL through performance testing following EPA Test Method 7E (see 40 CFR Part 60, Appendix A-4), or an alternate test method approved by DEQ, and shall comply with DEQ Source Sampling Manual, Rev. 2018.
 - c. Permittee shall demonstrate compliance through performance testing within one calendar year after this agreement is fully executed.
- 4. For the Power Boiler – 33:
 - a. By December 31, 2022, Permittee shall meet with DEQ to discuss the technical details of the low NO_x burner, flue gas recirculation, and continuous emissions monitoring system (CEMS) installation project to determine what permitting

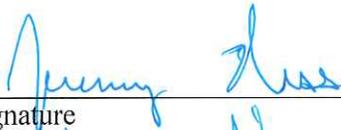
1 Permittee shall need prior to construction. Permittee and DEQ shall agree to a
2 timeline for permitting of construction project in the meeting, including required
3 deadlines for submittal of a complete approvable permit application.

- 4 b. As expeditiously as practicable, but not later than July 31, 2026, Permittee shall
5 install low NOx burners and flue gas recirculation in order to achieve an
6 emissions rate no greater than 0.09 lb/MMBtu on a seven day rolling basis. If
7 the project results in the Power Boiler - 33 becoming an affected facility under
8 40 CFR 60.40b, demonstration of compliance shall be on a 30-day rolling basis
9 rather than a seven-day rolling basis in accordance with 40 CFR 60.44b(i).
- 10 c. Within one year of completing the Power Boiler project in Section II.4.b, but no
11 later than July 31, 2026, Permittee shall install a CEMS to measure the
12 emissions of NOx from Power Boiler - 33. Permittee shall install the CEMS
13 according to the installation, quality control, and quality assurance requirements
14 detailed in the following:
- 15 i. Permittee shall demonstrate proper installation of the CEMS following
16 EPA Procedure 1 (see 40 CFR 60, Appendix F, Procedure 1),,
17 Performance Specification 2 (see 40 CFR 60, Appendix B, Performance
18 Specification 2), and DEQ Source Sampling Manual, Rev. 2018.
 - 19 ii. Permittee shall submit data collected during testing identified in Section
20 II.4.c.i of this Final Order to DEQ for review and to determine if the
21 CEMS was installed correctly and meets the identified quality assurance
22 criteria.
- 23 d. Upon DEQ's approval of the CEMS certification, Permittee shall use data
24 collected from the CEMS to demonstrate compliance with the applicable NOx
25 PSEL listed in Section II, paragraph 1 above.
- 26
27

1 e. Permittee shall collect and record all data from the NOx CEMS and make that
2 data available to DEQ upon request.
3
4

5 Georgia-Pacific Consumer Operations LLC (PERMITTEE)

6
7
8 8/9/21
9 Date

Signature 
Name (print) Jeremy Ness
Title (print) VP Mill Manager

10
11
12 DEPARTMENT OF ENVIRONMENTAL QUALITY and
13 ENVIRONMENTAL QUALITY COMMISSION

14
15 8/9/2021
16 Date


Ali Mirzakhali, Administrator
Air Quality Division
on behalf of DEQ pursuant to OAR 340-223-0110(2)

1 8. DEQ may submit this SAFO to the Environmental Protection Agency as part of the
2 State Implementation Plan under the federal Clean Air Act.

3 9. Permittee waives any and all rights and objections Permittee may have to the form,
4 content, manner of service, and timeliness of this SAFO and to a contested case hearing and judicial
5 review of the SAFO.

6 10. In the event EPA does not accept DEQ's Round II Regional Haze State
7 Implementation Plan (SIP) in any manner that impacts the final order, implementation of the Final
8 Order shall be stayed until DEQ and the Permittee modify the Final Order in such a manner as to
9 ensure compliance with the Round II Regional Haze SIP.

10 11. This SAFO shall be binding on Permittee and its respective successors, agents, and
11 assigns. The undersigned representative of Permittee certifies that he, she, or they are fully
12 authorized to execute and bind Permittee to this SAFO. No change in ownership, corporate, or
13 partnership status of Permittee, or change in the ownership of the properties or businesses affected
14 by this SAFO shall in any way alter Permittee's obligation under this SAFO, unless otherwise
15 approved in writing by DEQ through an amendment to this SAFO.

16 12. If any event occurs that is beyond Permittee's reasonable control and that causes or
17 may cause a delay or deviation in performance of the requirements of this SAFO, Permittee must
18 immediately notify DEQ verbally of the cause of delay or deviation and its anticipated duration, the
19 measures that Permittee has or will take to prevent or minimize the delay or deviation, and the
20 timetable by which Permittee proposes to carry out such measures. Permittee shall confirm in
21 writing this information within five (5) business days of the onset of the event. It is Permittee's
22 responsibility in the written notification to demonstrate to DEQ's satisfaction that the delay or
23 deviation has been or will be caused by circumstances beyond the control and despite due diligence
24 of Permittee. If Permittee so demonstrates, DEQ may extend times of performance of related
25 activities under this SAFO as appropriate. Circumstances or events beyond Permittee's control
26 include, but are not limited to, extreme and unforeseen acts of nature, unforeseen strikes, work
27 stoppages, fires, explosion, riot, sabotage, or war. Increased cost of performance or a consultant's

1 failure to provide timely reports are not considered circumstances beyond Permittee's control.

2 13. Facsimile or scanned signatures on this SAFO shall be treated the same as original
3 signatures.

4 II. FINAL ORDER

5 The DEQ hereby enters a final order requiring Permittee to comply with the following
6 schedule and conditions:

- 7 1. On and after July 31, 2022, the Permittee's combined assigned PSELs for the Power
8 Boiler, Package Boiler, Lime Kilns and Recovery Furnace for the following
9 pollutants are:
 - 10 a. 237 tons per year for SO₂, as a 12-month rolling average.
 - 11 b. 962 tons per year for NO_x, as a 12-month rolling average.
 - 12 c. 177 tons per year for PM₁₀, as a 12-month rolling average.
- 13 2. Permittee agrees that the only fuel that it may combust in the Power Boiler and
14 Package Boiler at the facility is natural gas, except that it may operate the Power
15 Boiler and Package Boiler on ultra-low sulfur diesel for no more than 48 hours per
16 year and when needed for natural gas curtailments.
- 17 3. Permittee agrees that the only fuels that it may combust in the Recovery Furnace are
18 Black Liquor Solids (BLS) and natural gas, except that it may operate the Recovery
19 Furnace on ultra-low sulfur diesel no more than 48 hours per year and when needed
20 for natural gas curtailment.
- 21 4. Permittee agrees that the only fuels that it may combust in the Lime Kilns are natural
22 gas, product turpentine and product methanol, except that it may operate the Lime
23 Kilns on ultra-low sulfur diesel no more than 48 hours per year and when needed for
24 natural gas curtailment.
- 25 5. By December 31, 2022, Permittee shall install CEMS and measure the emissions of
26 NO_x from the Power Boiler. Permittee shall install the CEMS according to the
27

1 installation, quality control, and quality assurance requirements detailed in the
2 following:

- 3 a. Permittee shall demonstrate proper installation of the CEMS following EPA
4 Procedure 1 (see 40 CFR 60, Appendix F, Procedure 1), Performance
5 Specification 2 (see 40 CFR 60, Appendix B, Performance Specification 2), and
6 DEQ Source Sampling Manual, Rev. 2018, no later than March 31, 2023.
- 7 b. Permittee shall submit data collected during testing identified in Section II.5 to
8 DEQ and LRAPA for review.
- 9 c. Upon DEQ's and LRAPA's approval of the CEMS certification, Permittee shall
10 use data collected from the CEMS to demonstrate compliance with the NOx
11 emissions rates in Section II.6 & 7.
- 12 d. Permittee shall ensure that the CEMS are certified by DEQ and LRAPA no later
13 than May 31, 2023.
- 14 e. Permittee shall use the CEMS to document Power Boiler emissions, replacing
15 the equation in Condition 186.g in the LRAPA permit that requires monitoring
16 of the Power Boiler NOx, no later than May 31, 2023.
- 17 f. Permittee shall collect and record all data from the NOx CEMS and make that
18 data available to DEQ and/or LRAPA upon request.

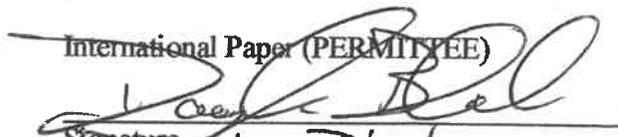
19 6. On and after January 31, 2025, Permittee shall meet the following emission limit:

- 20 a. 0.25 lb NOx/MMBtu on a 7-day rolling average from the Power Boiler

21 7. On and after December 31, 2025, the Permittee's assigned PSEL for the following
22 pollutants and Emission Unit is:

- 23 a. 179 tons per year for NOx, as a 12-month rolling average for the Power Boiler.

24
25 8/9/2021
26 Date

27
International Paper (PERMITTEE)

Signature
Douglas Black
Name (print)
Mill Manager - Springfield Mill
Title (print)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

LANE REGIONAL AIR PROTECTION AGENCY

8-9-21
Date

Steven A. Dietrich
Steven A. Dietrich, Director

DEPARTMENT OF ENVIRONMENTAL QUALITY and
ENVIRONMENTAL QUALITY COMMISSION

8/9/2021
Date

Ali Mirzakhali
Ali Mirzakhali, Administrator
Air Quality Division
on behalf of DEQ pursuant to OAR 340-223-0110(2)

1 BEFORE THE DEPARTMENT OF ENVIRONMENTAL QUALITY
2 OF THE STATE OF OREGON

3 STIPULATED AGREEMENT AND
4 IN THE MATTER OF) FINAL ORDER
Owens-Brockway Glass Container Inc.)
5) ORDER NO. 26-1876
6 Permittee.)

7
8 Permittee, Owens-Brockway Glass Container Inc., and the Department of
9 Environmental Quality (DEQ) hereby agree that:

10 WHEREAS:

- 11 1. Permittee operates a glass manufacturing facility located at 9710 NE Glass Plant
12 Road in Portland, Oregon (the Facility).
- 13 2. On November 1, 1997, DEQ issued Title V Operating Permit No. 26-1876-TV-01
14 (the Permit) to Permittee.
- 15 3. On December 10, 2019, DEQ renewed the Permit.
- 16 4. The Permit authorizes Permittee to discharge air contaminants associated with its
17 operation of the Facility in conformance with the requirements, limitations, and conditions set forth
18 in the Permit.
- 19 5. As of December 31, 2017, the Permit had the following plant site emissions limit
20 (PSEL) for sulfur dioxide (SO₂), particulate matter of ten microns or less (PM₁₀), and nitrogen
21 oxides (NO_x), which constitute round II regional haze pollutants, *see* OAR 340-223-0020(2) at the
22 Facility: 313 tons per year SO₂, 132 tons per year PM₁₀ and 711 tons per year NO_x.
- 23 6. The Facility is located 55.1 kilometers from Mount Hood Wilderness Area, which is
24 the nearest Class I Area, *see* OAR 340-200-0020(25), measured in a straight line from the Facility
25 to the Class I Area.
- 26 7. Based on the definitions and the formula in OAR 340-223-0100(2) the Facility's Q
27 value is 1156; d value is 55.1, and ratio of Q divided by d is 21.0.

1 8. Because the Facility has a Title V operating permit and because the Facility has a
2 Q/d value of greater than 5.00, the Facility is subject to the requirements of round II of regional
3 haze. *See* OAR 340-223-0100(1).

4 9. Rather than complying with OAR 340-223-0110(1), the Facility would like to enter
5 into a Stipulated Agreement with DEQ for alternative compliance with round II of regional haze
6 and would like to accept federally enforceable reductions of combined plant site emission limits of
7 round II regional haze pollutants to bring the Facility's Q/d below 5.00 which DEQ shall
8 incorporate into a Final Order. *See* OAR 340-223-0110(2)(b)(A).

9 I. AGREEMENT

10 1. DEQ issues this Stipulated Agreement and Final Order (SAFO) pursuant to OAR
11 340-223-0110(2)(b)(A), and it shall be effective upon the date fully executed.

12 2. The Facility is subject to round II of regional haze, according to OAR 340-223-
13 0100(1).

14 3. The Permittee agrees to and will ensure compliance with the PSEL reductions
15 schedule in Section II of this SAFO.

16 4. The Permittee has previously ceased operations of Furnace B and Furnace C and
17 agrees that it will not operate Furnace B or Furnace C in the future.

18 5. The PSEL reductions required by this SAFO shall not be banked, credited, or
19 otherwise accessed by Permittee for use in future permitting actions.

20 6. PSELs for this Facility shall not be increased above those established in this SAFO
21 except as approved in accordance with applicable state and federal permitting regulations.

22 7. The Permittee shall calculate compliance with the PSELs in Section II of this SAFO
23 according to the requirements of the Permit.

24 8. DEQ shall incorporate this SAFO and the conditions in Section II below into the
25 Permit pursuant to OAR 340-218-200(1)(a)(A), or upon permit renewal.

26 9. DEQ may submit this SAFO to the Environmental Protection Agency as part of the
27 State Implementation Plan under the federal Clean Air Act.

1 10. Permittee waives any and all rights and objections Permittee may have to the form,
2 content, manner of service, and timeliness of this SAFO and to a contested case hearing and judicial
3 review of the SAFO.

4 11. In the event EPA does not accept DEQ's Round II Regional Haze State
5 Implementation Plan (SIP) in any manner that impacts the final order, implementation of the Final
6 Order shall be stayed until DEQ and the Permittee modify the Final Order in such a manner as to
7 ensure compliance with the Round II Regional Haze SIP.

8 12. This SAFO shall be binding on Permittee and its respective successors, agents, and
9 assigns. The undersigned representative of Permittee certifies that he, she, or they are fully
10 authorized to execute and bind Permittee to this SAFO. No change in ownership, corporate, or
11 partnership status of Permittee, or change in the ownership of the properties or businesses affected
12 by this SAFO shall in any way alter Permittee's obligation under this SAFO, unless otherwise
13 approved in writing by DEQ through an amendment to this SAFO.

14 13. If any unforeseen event occurs that is beyond Permittee's reasonable control and that
15 causes or may cause a delay or deviation in performance of the requirements of this SAFO,
16 Permittee must immediately notify DEQ verbally of the cause of delay or deviation and its
17 anticipated duration, the measures that Permittee has or will take to prevent or minimize the delay or
18 deviation, and the timetable by which Permittee proposes to carry out such measures. Permittee
19 shall confirm in writing this information within five (5) business days of the onset of the event. It is
20 Permittee's responsibility in the written notification to demonstrate to DEQ's satisfaction that the
21 delay or deviation has been or will be caused by circumstances beyond the control and despite due
22 diligence of Permittee. If Permittee so demonstrates, DEQ may extend times of performance of
23 related activities under this SAFO as appropriate. Circumstances or events beyond Permittee's
24 control include, but are not limited to, extreme and unforeseen acts of nature, unforeseen strikes,
25 work stoppages, fires, explosion, riot, sabotage, or war. Increased cost of performance or a
26 consultant's failure to provide timely reports are not considered circumstances beyond Permittee's
27 control.

1 14. Facsimile or scanned signatures on this SAFO shall be treated the same as original
2 signatures.

3 II. FINAL ORDER

4 The DEQ hereby enters a final order requiring Permittee to comply with the following
5 schedule and conditions:

- 6 1. On and after the execution of this Final Order:
7 a. Permittee shall not operate Furnace A.
8 2. On and after January 1, 2022, the Permittee shall comply with the following PSELS,
9 which apply to each 12 consecutive calendar month period after that date:
10 i. 55 tons per year for PM10; 137 tons per year for NOx; and 108 tons per
11 year for SO2.
12 b. Unassigned emissions shall be set to 0.
13 c. The netting basis for Furnace A, Furnace B, and Furnace C shall be removed
14 from the total netting basis of the Facility.
15 3. On July 31, 2025, the Permittee's PSELS for the following pollutants are:
16 i. 274.95 tons per year for PM10 + NOx + SO2 (Q/d = 4.99).

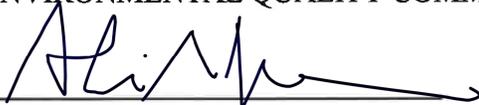
17 Owens Brockway Glass Container (PERMITTEE)

18
19 8-8-21
20 Date

21 
22 Signature
23 William D Mann
24 Name (print)
25 VP Operations, NA.
26 Title (print)

27 DEPARTMENT OF ENVIRONMENTAL QUALITY and
ENVIRONMENTAL QUALITY COMMISSION

8/9/2021
Date


Ali Mirzakhali, Administrator
Air Quality Division
on behalf of DEQ pursuant to OAR 340-223-0110(2)

1 BEFORE THE DEPARTMENT OF ENVIRONMENTAL QUALITY
2 OF THE STATE OF OREGON
3

4 IN THE MATTER OF) STIPULATED AGREEMENT AND
Roseburg Forest Products Co.) FINAL ORDER
5)
6 Permittee.) ORDER NO. 10-0025

7 Permittee, Roseburg Forest Products Co., and the Department of Environmental Quality
8 (DEQ) hereby agree that:

9 WHEREAS:

10 1. Permittee operates a wood products facility located at Old Highway 99S in Dillard,
11 Oregon (the Facility).

12 2. On October 20, 1997, DEQ issued Title V Operating Permit No. 10-0025-TV-01
13 (the Permit) to Permittee.

14 3. On April 13, 2021, DEQ renewed the Permit.

15 4. The Permit authorizes Permittee to discharge air contaminants associated with its
16 operation of the Facility in conformance with the requirements, limitations, and conditions set forth
17 in the Permit.

18 5. As of December 31, 2017, the Permit had the following plant site emissions limit
19 (PSEL) for sulfur dioxide (SO₂), particulate matter of ten microns or less (PM₁₀), and nitrogen
20 oxides (NO_x), which constitute round II regional haze pollutants, *see* OAR 340-223-0020(2): 113
21 tons per year for SO₂, 683 tons per year for PM₁₀, and 1655 tons per year for NO_x.

22 6. The Facility is located 81.8 kilometers from Kalmiopsis Wilderness Area, which is
23 the nearest Class I Area, *see* OAR 340-200-0020 (25), measured in a straight line from the Facility
24 to the Class I Area.

25 7. Based on the definitions and the formula in OAR 340-223-0100(2), the Facility's Q
26 value is 2451; d value is 81.8, and ratio of Q divided by d is 29.97.

1 8. Because the Facility has a Title V operating permit and because the Facility has a
2 Q/d value of greater than 5.00, the Facility is subject to the requirements of round II of regional
3 haze. *See* OAR 340-223-0100(1).

4 9. Rather than complying with OAR 340-223-0110(1), the Facility would like to enter
5 into a Stipulated Agreement with DEQ for alternative compliance with round II of regional haze
6 and would like to accept a federally enforceable requirement to install and continually operate
7 control devices, pollution prevention equipment, monitoring equipment and accept emission
8 limitations to reduce round II regional haze pollutants from the Facility which DEQ shall
9 incorporate into a Final Order. *See* OAR 340-223-0110(2).

10 I. AGREEMENT

11 1. DEQ issues this Stipulated Agreement and Final Order (SAFO) pursuant to OAR
12 340-223-0110(2), and it shall be effective upon the date fully executed.

13 2. The Facility is subject to round II of regional haze, according to OAR 340-223-
14 0100(1).

15 3. The Permittee agrees to and will ensure compliance with the PSEL reductions,
16 emission limits, and controls and CEMS installation schedules and conditions in Section II of
17 this SAFO.

18 4. The reductions to PSELs required by this SAFO shall not be banked, credited, or
19 otherwise accessed by Permittee for use in future permitting actions.

20 5. PSELs for this Facility shall not be increased above those established in this SAFO
21 except as approved in accordance with applicable state and federal permitting regulations.

22 6. The Permittee shall calculate compliance with the PSELs in Section II of this SAFO
23 according to the requirements of the Permit.

24 7. DEQ shall incorporate this SAFO and the conditions in Section II below into the
25 Permit pursuant to OAR 340-218-0200(1)(a)(A), if applicable, or upon permit renewal.

26 8. DEQ may submit this SAFO to the Environmental Protection Agency as part of the
27 Clean Air Act State Implementation Plan.

1 9. Permittee waives any and all rights and objections Permittee may have to the form,
2 content, manner of service, and timeliness of this SAFO and to a contested case hearing and judicial
3 review of the SAFO.

4 10. In the event EPA does not accept DEQ's Round II Regional Haze State
5 Implementation Plan (SIP) in any manner that impacts the final order, implementation of the Final
6 Order shall be stayed until DEQ and the Permittee modify the Final Order in such a manner as to
7 ensure compliance with the Round II Regional Haze SIP.

8 11. This SAFO shall be binding on Permittee and its respective successors, agents, and
9 assigns. The undersigned representative of Permittee certifies that he, she, or they are fully
10 authorized to execute and bind Permittee to this SAFO. No change in ownership, corporate or
11 partnership status of Permittee, or change in the ownership of the properties or businesses affected
12 by this SAFO shall in any way alter Permittee's obligation under this SAFO, unless otherwise
13 approved in writing by DEQ through an amendment to this SAFO.

14 12. If any unforeseen event occurs that is beyond Permittee's reasonable control and that
15 causes or may cause a delay or deviation in performance of the requirements of this SAFO,
16 Permittee must immediately notify DEQ verbally of the cause of delay or deviation and its
17 anticipated duration, the measures that Permittee has or will take to prevent or minimize the delay or
18 deviation, and the timetable by which Permittee proposes to carry out such measures. Permittee
19 shall confirm in writing this information within five (5) working days of the onset of the event. It is
20 Permittee's responsibility in the written notification to demonstrate to DEQ's satisfaction that the
21 delay or deviation has been or will be caused by circumstances beyond the control, unforeseen, and
22 despite due diligence of Permittee. If Permittee so demonstrates, DEQ may extend times of
23 performance of related activities under this SAFO as appropriate. Circumstances or events beyond
24 Permittee's control include, but are not limited to, extreme and unforeseen acts of nature, unforeseen
25 strikes, work stoppages, fires, explosion, riot, sabotage, or war. Increased cost of performance or a
26 consultant's failure to provide timely reports are not considered circumstances beyond Permittee's
27 control.

1 13. Facsimile or scanned signatures on this SAFO shall be treated the same as original
2 signatures.

3 II. FINAL ORDER

4 DEQ hereby enters a final order requiring Permittee to comply with the following schedule
5 and conditions:

- 6
- 7 1. By July 31, 2022, Permittee shall install CEMS to measure the emissions of NOx
8 from Boiler 1, Boiler 2 and Boiler 6. Permittee shall install the CEMS according to
9 the following installation, quality control, and quality assurance requirements:
- 10 a. By September 31, 2022, Permittee shall demonstrate proper installation of the
11 CEMS following EPA Procedure 1 (see 40 CFR 60, Appendix F, Procedure 1),
12 Performance Specification 2 (see 40 CFR 60, Appendix B, Performance
13 Specification 2), and DEQ Source Continuous Monitoring Manual, Rev. 2015.
- 14 b. By December 31, 2022, Permittee shall submit data collected during
15 demonstrations required under Section II.1.a to DEQ for review and approval of
16 the CEMS.
- 17 c. Upon DEQ's approval of the CEMS certification, Permittee shall use data
18 collected from the CEMS to demonstrate compliance with the applicable NOx
19 emission limits listed in Section II.2 and II.4.
- 20 d. Permittee shall collect and record all data from the NOx CEMS and make those
21 data available to DEQ upon request.
- 22 2. From January 31, 2023 until June 30, 2025, Permittee shall meet the following
23 emission limits:
- 24 a. 0.30 lb NOx/MMBtu on a 7-day rolling average at Boiler 1;
25 b. 0.30 lb NOx/MMBtu on a 7-day rolling average at Boiler 2;
26 c. 0.28 lb NOx/MMBtu on a 7-day rolling average at Boiler 6; Or
27

- 1 d. Average of emissions from Boiler 1, Boiler 2, and Boiler 6 of 0.28 lb
 2 NOx/MMBtu (7-day rolling average).
- 3 3. By January 31, 2024, the Permittee shall notify DEQ in writing whether the
 4 Permittee will comply with the emission limits in Section II.4 using boiler
 5 optimization or through the installation of Selective Non-Catalytic Reduction
 6 controls (SNCR).
- 7 a. If the Permittee determines that the installation of SNCR controls are required to
 8 meet the emission limits in Section II.4, SNCR shall be installed, permitted, and
 9 operational by June 30, 2025.
- 10 b. Permittee shall submit a complete permit application for construction and
 11 operation of the SNCR by June 30, 2024.
- 12 4. On and after June 30, 2025, Permittee shall meet the following emission limits:
- 13 a. 0.27 lb NOx/MMBtu on a 7-day rolling average at Boiler 1;
 14 b. 0.26 lb NOx/MMBtu on a 7-day rolling average at Boiler 2;
 15 c. 0.26 lb NOx/MMBtu on a 7-day rolling average at Boiler 6; Or
 16 d. Average of emissions from Boiler 1, Boiler 2, and Boiler 6 of 0.25 lb
 17 NOx/MMBtu (7-day rolling average).

18 Roseburg Forest Products Co. (PERMITTEE)

19 8/9/2021
 20 Date

20 Stuart W. Gray
 Signature
 21 Stuart W. Gray
 Name (print)
 22 SVP, General Counsel & Secretary
 Title (print)

23 DEPARTMENT OF ENVIRONMENTAL QUALITY and
 24 ENVIRONMENTAL QUALITY COMMISSION

25 8/9/2021
 26 Date

25 Ali Mirzakhali
 26 Ali Mirzakhali, Administrator
 Air Quality Division
 27 on behalf of DEQ pursuant to OAR 340-223-0110(2)

1 8. Because the Facility has a Title V operating permit and because the Facility has a
2 Q/d value of greater than 5.00, the Facility is subject to the requirements of round II of regional
3 haze. See OAR 340-223-0100(1).

4 9. Rather than complying with OAR 340-223-0110(1), the Facility would like to enter
5 into a Stipulated Agreement with DEQ for alternative compliance with round II of regional haze
6 and would like to accept federally enforceable reductions of combined PSEL of round II regional
7 haze pollutants to bring the Facility's Q/d below 5.00 and remove #6 fuel oil as a permitted fuel
8 source from their Title V operating permit, which DEQ shall incorporate into a Final Order. See
9 OAR 340-223-0110(2)(b).

10 I. AGREEMENT

11 1. DEQ issues this Stipulated Agreement and Final Order (SAFO) pursuant to OAR
12 340-223-0110(2)(b)(A), and it shall be effective upon the date fully executed.

13 2. The Facility is subject to round II of regional haze, according to OAR 340-223-
14 0100(1).

15 3. The Permittee agrees to and will ensure compliance with the PSEL reductions
16 schedule in Section II of this SAFO.

17 4. The PSEL reductions required by this SAFO shall not be banked, credited, or
18 otherwise accessed by Permittee for use in future permitting actions.

19 5. PSELs for this Facility shall not be increased above those established in this SAFO
20 except as approved in accordance with applicable state and federal permitting regulations.

21 6. Permittee shall calculate compliance with the PSELs in Section II of this SAFO
22 according to the requirements of the Permit.

23 7. DEQ shall incorporate this SAFO and the conditions in Section II below into the
24 Permit pursuant to OAR 340-218-200(1)(a)(A), as applicable, or upon permit renewal.

25 8. DEQ may submit this SAFO to the Environmental Protection Agency as part of the
26 State Implementation Plan under the federal Clean Air Act.

27 9. Permittee waives any and all rights and objections Permittee may have to the form,

1 content, manner of service, and timeliness of this SAFO and to a contested case hearing and judicial
2 review of the SAFO.

3 10. In the event EPA does not accept DEQ's Round II Regional Haze State
4 Implementation Plan (SIP) in any manner that impacts the final order, implementation of the Final
5 Order shall be stayed until DEQ and the Permittee modify the Final Order in such a manner as to
6 ensure compliance with the Round II Regional Haze SIP.

7 11. This SAFO shall be binding on Permittee and its respective successors, agents, and
8 assigns. The undersigned representative of Permittee certifies that he, she, or they are fully
9 authorized to execute and bind Permittee to this SAFO. No change in ownership, corporate, or
10 partnership status of Permittee, or change in the ownership of the properties or businesses affected
11 by this SAFO shall in any way alter Permittee's obligation under this SAFO, unless otherwise
12 approved in writing by DEQ through an amendment to this SAFO.

13 12. If any unforeseeable event occurs that is beyond Permittee's reasonable control and
14 that causes or may cause a delay or deviation in performance of the requirements of this SAFO,
15 Permittee must immediately notify DEQ verbally of the cause of delay or deviation and its
16 anticipated duration, the measures that Permittee has or will take to prevent or minimize the delay or
17 deviation, and the timetable by which Permittee proposes to carry out such measures. Permittee
18 shall confirm in writing this information within five business days of the onset of the event. It is
19 Permittee's responsibility in the written notification to demonstrate to DEQ's satisfaction that the
20 delay or deviation has been or will be caused by circumstances beyond the control and despite due
21 diligence of Permittee. If Permittee so demonstrates, DEQ may extend times of performance of
22 related activities under this SAFO as appropriate. Circumstances or events beyond Permittee's
23 control include, but are not limited to, extreme and unforeseen acts of nature, unforeseen strikes,
24 work stoppages, fires, explosion, riot, sabotage, or war. Increased cost of performance or a
25 consultant's failure to provide timely reports are not considered circumstances beyond Permittee's
26 control.

27 13. Facsimile or scanned signatures on this SAFO shall be treated the same as original

1 signatures.

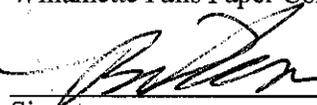
2 II. FINAL ORDER

3 The DEQ hereby enters a final order requiring Permittee to comply with the following
4 schedule and conditions:

- 5 1. Permittee shall comply with the PSELs according to the following schedule:
- 6 a. On August 1, 2022, the Permittee's PSELs for the following pollutants are:
- 7 i. 20 tons per year for PM10, 240 tons per year for NOx, and 5 tons per
8 year for SO2.
- 9 2. Permittee agrees that the only fuel that it may combust in the Boiler 1, Boiler 2 and
10 Boiler 3 at the facility is natural gas, except that it may operate the Boiler 1, Boiler 2,
11 and Boiler 3 on ultra-low sulfur diesel for no more than 48 hours per year.

12 Willamette Falls Paper Company, Inc. (PERMITTEE)

13 8/9/2021
14 Date

13 
14 Signature

15 BRIAN KOWEN
16 Name (print)

17 PRESIDENT
18 Title (print)

19 DEPARTMENT OF ENVIRONMENTAL QUALITY and
20 ENVIRONMENTAL QUALITY COMMISSION

21 8/9/2021
22 Date

20 

21 Ali Mirzakhali, Administrator
22 Air Quality Division
23 on behalf of DEQ pursuant to OAR 340-223-0110(2)

1 Based upon the foregoing FINDINGS OF FACT AND CONCLUSIONS OF LAW, and
2 pursuant to OAR 340-223-0130(1), Respondent is hereby ORDERED TO:

3 1. By July 31, 2023, Respondent shall submit to DEQ a complete and approvable permit
4 application to incorporate appropriate and required permit conditions for the installation and operation
5 of Selective Catalytic Reduction (SCR) and Continuous Emissions Monitoring System (CEMS) on
6 Turbines 13C and 13D.

7 2. By July 31, 2024, install a CEMS on Turbines 13C and 13D to measure the emissions of
8 NOx.

9 a. Respondent shall demonstrate proper installation of the CEMS following EPA
10 Procedure 1 (see 40 CFR 60, Appendix F, Procedure 1), Performance Specification
11 2 (see 40 CFR 60, Appendix B, Performance Specification 2), and DEQ Continuous
12 Monitoring Manual, Rev. 2015; and

13 b. Respondent shall submit data collected during testing identified in Section IV.1.a of
14 this Final Order to DEQ for review and to determine if the CEMS was installed
15 correctly and meets the identified quality assurance criteria.

16 3. By July 31, 2026, install, maintain, and continuously operate SCR on Turbines 13C and
17 13D with a minimum control efficiency of 90%.

18 4. Respondent shall not operate Turbines 13C and 13D after August 1, 2026, unless the
19 SCR is properly operating.

20 V. NOTICE OF RIGHT TO REQUEST A CONTESTED CASE HEARING

21 You have a right to a contested case hearing on this Order, if you request one in writing. DEQ
22 must receive your request for hearing **within 10 calendar days** from the date you receive this Order. If
23 you have any affirmative defenses or wish to dispute any allegations of fact in this Order, you must do
24 so in your request for hearing, as factual matters not denied will be considered admitted, and failure to
25 raise a defense will be a waiver of the defense. (See OAR 340-011-0530 for further information about
26 requests for hearing.) You must send your request to: **DEQ, Office of Compliance and Enforcement,**
27 **700 NE Multnomah Street, Suite 600, Portland, Oregon 97232**, fax it to **503-229-6762** or email it to

DEQappeals@deq.state.or.us. An administrative law judge employed by the Office of Administrative

1 Hearings will conduct the hearing, according to ORS Chapter 183, OAR Chapter 340, Division 011 and
2 OAR 137-003-0501 to 0700. You have a right to be represented by an attorney at the hearing, however
3 you are not required to be. If you are an individual, you may represent yourself. If you are a
4 corporation, partnership, limited liability company, unincorporated association, trust or government
5 body, you must be represented by an attorney or a duly authorized representative, as set forth in OAR
6 137-003-0555.

7 Active duty Service members have a right to stay proceedings under the federal Service
8 Members Civil Relief Act. For more information contact the Oregon State Bar at 1-800-
9 452-8260, the Oregon Military Department at 503-584-3571, or the nearest United States Armed
10 Forces Legal Assistance Office through <http://legalassistance.law.af.mil>. The Oregon Military
11 Department does not have a toll free telephone number.

12 If you fail to file a timely request for hearing, the Order will become a final order by default
13 without further action by DEQ, as per OAR 340-011-0535(1). If you do request a hearing but later
14 withdraw your request, fail to attend the hearing or notify DEQ that you will not be attending the
15 hearing, DEQ will issue a final order by default pursuant to OAR 340-011-0535(3). DEQ designates
16 the relevant portions of its files, including information submitted by you, as the record for purposes of
17 proving a prima facie case.

18
19
20 8/9/2021

21 Date


22 Ali Mirzakhali, Air Quality Administrator
23 Oregon Department of Environmental Quality
24
25
26
27

Notice of Approval Application

FOR DEQ USE ONLY	
Permit Number:	Regional Office: ER - AQ Permit Coordinator
Application No:	Check Number:
Date Received:	Amount (\$):
Approved (date):	Staff Initials:

1. Source Number: 18-0005-TV-01	
2. Company	3. Facility Location
Legal Name: Gilchrist Forest Products LLC	Name: Gilchrist Facility
Ownership type: Corporate	Plant start date: 03/28/1994
Mailing Address: P.O. Box 218	Street Address: #1 Sawmill Road
City, State, Zip Code: Hulett, WY 82720	City, County, Zip Code: Gilchrist, OR 977 Klamath
4. Number of Employees (corporate): 150	Number of Employees (plant site): 150

5. Contact Person	6. Industrial Classification Code(s)
Name: Mike Zojonc	SIC: 2421, 4961
Title: Plant Manager	NAICS: 321113, 221330
Phone number: (541) 815-9245	7. Type of construction/change*: Adding ESP device to existing boiler to control PM10 emissions
Fax number:	
Email address: mike.zojonc@gilchristfp.com	

8. Signature	
Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.	
Mike Zojonc	Plant Manager
_____ Name of Responsible Official	_____ Title of Responsible Official
 _____ Signature of Responsible Official	June 8, 2021 _____ Date

*Note: This form requires a \$720 fee (OAR 340-216-8020 Table 2) for Type 2 Construction. For a description of Construction Types 1 through 4, see [OAR 340-210-0225](#).

Construction information

9.	<p>Will the construction or project establish a new or relocated emissions unit or point at the facility or location?</p> <p>If yes include or attach a plot plan, map, or other map-related image that clearly shows at least the following:</p> <ul style="list-style-type: none"> • The physical location of the site and proposed construction or change; • The height of the proposed constructed or modified source and emissions point(s) and stack exit points; • A table or scale for distance; • The location of the nearest zoned residential property; and • The location of the nearest zoned commercial property. 	<p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p>
10.	<p>Will the construction allow for an increase in production or capacity of the facility?</p> <p>If yes, by how much (include appropriate units or appropriate clarifying details; attach additional pages as necessary):</p>	<p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p>
11.	<p>Will the construction result in:</p> <ul style="list-style-type: none"> • An increase or decrease any regulated pollutant emissions; or • Cause any new regulated pollutants to be emitted that were not emitted previously? <p>If yes, use the pre and post-construction 'Emissions Data' table below for each regulated pollutant change (increase or decrease) and each new pollutant. See OAR 340-200-0020(134) for a description of regulated pollutants [For the purposes of this form, regulated air pollutant does not include Toxic Air Contaminants]</p>	<p>Yes <input checked="" type="checkbox"/></p> <p>No <input type="checkbox"/></p>
12.	<p>Are there any requirements applicable to the new construction or modification?</p> <p>If yes, list them by rule citation (attach additional pages as necessary):</p> <p>OAR 340-218-0190 OAR 340-0210-0240</p>	<p>Yes <input checked="" type="checkbox"/></p> <p>No <input type="checkbox"/></p>

Fill out one of the following (13a or 13b) as appropriate:

13.a **New and unpermitted facilities:** Describe any existing facility or operations on site and the proposed construction.
N/A

13.b **Existing permitted facilities:** Describe the proposed construction or modification and describe the changes to existing processes or activities. N/A

New construction to add an electrostatic precipitator (ESP) air pollution control device to existing boiler to control PM10 emissions. No changes to throughput. The addition of the ESP to the existing boilers system at Gilchrist Forest Products should not have any impact on the normal boiler operation or boiler operational parameters. There will be several ESP operational recommendations to help optimize ESP performance, such as during boiler start-ups waiting until an appropriate boiler exhaust gas temperature is established before energizing the ESP, but the ESP addition itself should not have any impact on boiler operation or performance.

14. Provide a brief description of the production process **and** attach or include a detailed process flow chart or diagram clearly showing new/existing emissions units and any changes to the process flow expected after the construction or modification: N/A

15.	If the construction/project increases the size (i.e., physical footprint) of the facility/operations, a <u>LUCS</u> specific to the change(s) is required (unless the construction is exclusively for the installation of pollution control equipment). All new facilities or additional properties being used require an approved LUCS. If this change requires land use approval, have you attached or included an approved LUCS?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
16.	If the construction involves any new emission unit(s) or changes to existing emission unit(s), series DV200 and EU500 forms are required. Have you attached or included all necessary DV200 and EU500 forms?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
17.	If the construction includes pollution control equipment, series CD300 form(s), manufacturer information, and/or equipment specifications are required. Have you attached or included all necessary CD300 forms and relevant supplemental material?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Will the construction or project result in any increase or new fuels being used on site? If yes, list the types and approximate quantities expected to be used:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
19.	Will the construction or project result in any new or additional refuse generation? If yes: What are the approximate types and amounts? What will be the method of disposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If the proposed construction or project has any association with underground storage tanks (or the associated piping), it is the applicant's responsibility to contact the UST program to determine any additional applicable requirements. UST Email: tanks.info@deq.state.or.us UST Phone: 503-229-6652 or 800-742-7878		

Timing of construction:

20.	Date on which contracts are signed, equipment is ordered, or the facility/entity has or will otherwise 'commit' to initiating construction activities	(mm/dd/yyyy) 11/04/2020
21.	Anticipated date of the beginning of physical construction (e.g. breaking ground)	06/21/2021
22.	Anticipated date of construction completion	09/15/2021

23. Include or otherwise attach any information on pollution prevention measures or cross-media impacts you want DEQ to consider in determining applicable control requirements and evaluating compliance methods.



Facility name: Gilchrist Facility Permit Number: 18-0005-TV-01

1.	Device name and ID number or label	Wood-fired boilers, B-1 & B-2
2.	Date installation/construction commenced	1939
3.	Date installed	1939
4.	Special control requirements? [if yes, describe]	
5.	Manufacturer	Wickes
6.	Description of boiler, including type of boiler and firing method: The steam plant sources include emission units B-1 and B-2, which are sources of NOx, SO2, VOC and PM10 emissions. Emission units B-1 and B-2 are Dutch oven boilers that were manufactured by Wickes in 1939. Each of these boilers has a steam production capacity of approximately 50,000 pounds per hour (lb/hr) steam. Steam from the two boilers is measured by a single steam flow monitor. B-1 and B-2 are each equipped with a multicclone to control PM emissions and both boilers exhaust through a common stack. A multicclone is type of mechanical separator that contains an array of cyclones used to clean the boiler exhaust.	
7.	Rated design capacity (heat input, Btu/hr)	79,500,000
8.	Maximum steam production rate (lbs/hr)	50,000
9.	Maximum steam pressure (psi)	230
10.	Maximum steam temperature (°F)	520

11. Fuel usage: [for EACH fuel, enter]:

Fuel	Maximum hourly firing rate (specify units)
Hog Fuel	4.5 tons hog fuel/hr

**FORM EU501
Answer Sheet**

Emissions Unit Summary

Facility name: Gilchrist Facility Permit Number: 18-0005-TV-01

1.	Emissions Unit name and ID number or label	B-1, B-2
2.	Emissions Unit description	Wood/bark fired boilers
3.	Operating Scenario ID number	PTE

4. Emission devices, processes, and control devices:

Device/process ID(s) from DV2XX	Control Device ID(s) from CD3XX
Wood-fired boilers, B-1 & B-2	ESP

5. Pollutants/Emissions:

Pollutant	PSEL Component from ED605
PM	81.0
PM10	60.0
PM2.5	52.5

Table 6: Applicable Requirements (next page)



Facility name: Gilchrist Facility Permit Number: _____

1.	Name				
2.	ID number or label	TBD			
3.	Date installed	2021			
4.	Manufacturer				
5.	Model number	2W-091-2422			
6.	Type (wet or dry)	dry <input checked="" type="radio"/>			
7.	Rated efficiency (%)	82.22			
8.	Inlet gas pre-treatment?	<small>Multiclone dust collector on each boiler</small>			
9.	Number of fields	2 electrical fields			
10.	Design primary voltage	480 volts			
11.	Design secondary voltage	70,000 volts			
12.	Design primary current	70 amps	94 amps		
13.	Design secondary current	800 MA	1000 MA		
14.	Design inlet gas flow rate (acfm)	150,000 ACFM			

Requested annual plant site emission limits

Form ED605A

Emissions Unit Summary:

EU ID	Pollutant	Annual Emissions (tons/yr)
B1-B2	PM	81.0
B1-B2	PM10	80.0
B1-B2	PM2.5	52.5

Facility Summary:

Pollutant	Annual Emissions (tons/yr)
PM	121
PM10	81
PM2.5	65
SO2	39
NOx	104
CO	721
VOC	209
GHG	132,300

Summary of requested changes to PSELS

Pollutant	Facility-wide	B1 & B2 Annual Emissions, Tons			Facility-wide
	Current PSEL	Current PTE	New PTE	Difference	Post-Construction PSEL
*PM	243	203.9	81.0	122.9	121
**PM ₁₀	208	187.2	60.0	127.2	81
***PM _{2.5}	126	114.2	52.5	61.7	65
SO ₂	39	5.3	5.3	0	39
NO _x	104	97.2	97.2	0	104
CO	721	715.9	715.9	0	721
VOC	209	14.3	14.3	0	209

*PM calculated assuming PM₁₀ is 74.1% of total PM

AP-42 Section 1.6 9/03, Table 1.6-1, Electrostatic Precipitator Wellons, Inc. 2021

**Emission rate guarantee from manufacturer after installation of ESP

***PM_{2.5} assumed to be 87.5% of PM₁₀

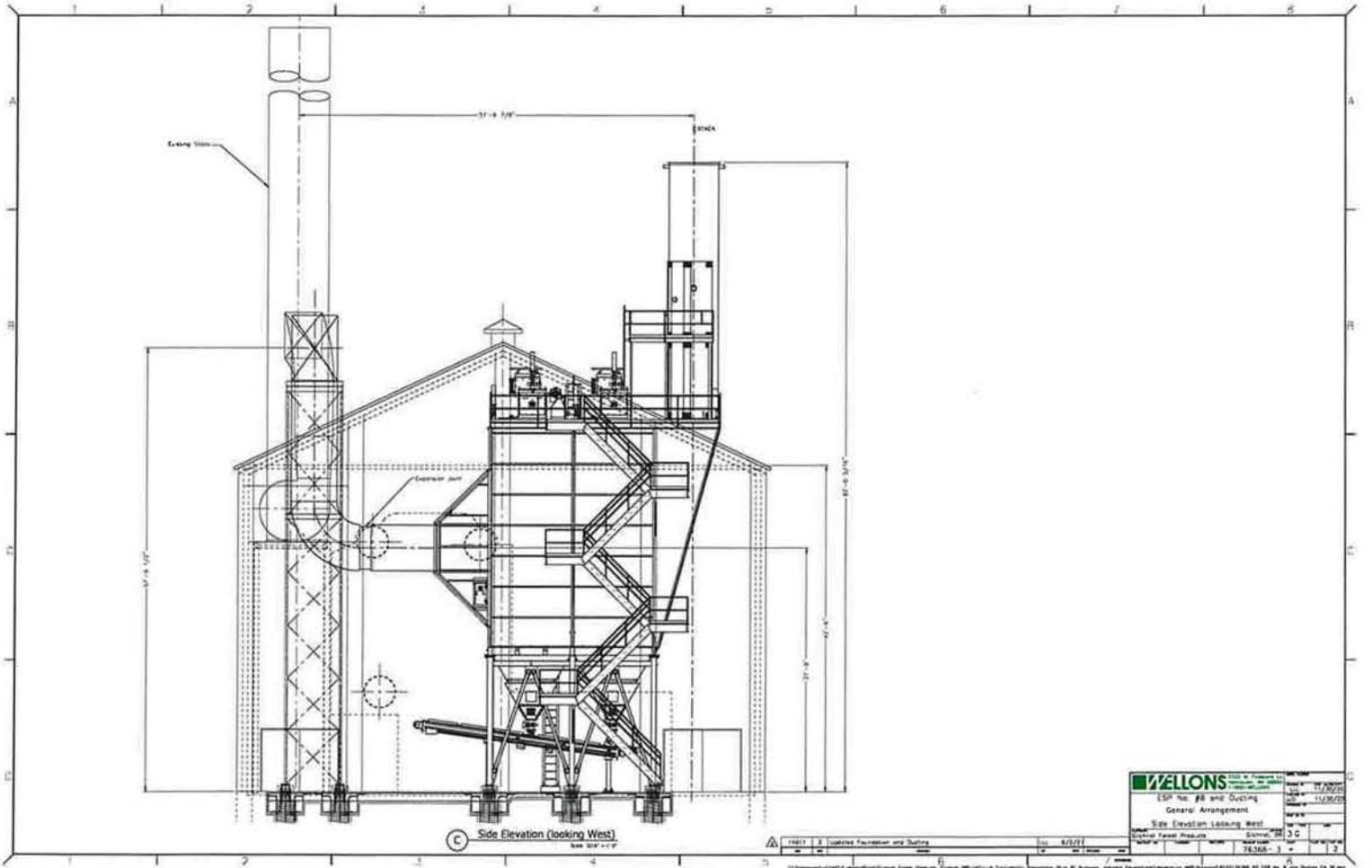
AP-42 Section 1.6 9/03, Table 1.6-1, Electrostatic Precipitator

6. Applicable Requirements:

Applicable Requirement Citation	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Current Monitoring Method	Proposed Monitoring Method
340-208-0110 (1)	Visible Air Contaminant Limitations	20% Opacity	Yes	PVEM	PVEM
340-208-0210(2)	Fugitive Emissions	Minimize	Yes	PVEM; REC	PVEM; REC
340-228-0210(1) (a)	Grain Loading Standards	0.2 gr/dscf @ 12% CO2	Yes	CMS; ST; O&M	CMS; ST; O&M; MMP
340-212-0200 - 340-212-0280	residual O2	6% - 13%	Yes	REC	REC
340-212-0200 - 340-212-0280	pressure drop	1" H2O - 4" H2O	Yes	REC	REC
340-220-0120, 340-220-0180	PM10, SO2, NOx, VOC	Approved EFs; production recs	Yes	REC	REC
340-222-0041	PM, SO2, NOx, VOC	PTE	Yes	REC; ST	REC; ST
340-222-0046	PM, PM2.5, PM10, SO2, NOx, CO, VOC, GHG	max production, verified EFs	Yes	REC; ST	REC; ST
340-222-0048	PM, PM10, SO2, NOx, CO, VOC	actual 1977 emissions	Yes	REC; ST	REC; ST
340-222-0048	GHG	actual 2004 emissions	Yes	REC	REC
340-222-0051	PM, SO2, NOx, CO, VOC, GHG	production data, verified EFs	Yes	REC; ST	REC; ST
340-222-0055	PM, SO2, NOx, CO, VOC, GHG	netting basis - PTE	Yes	REC; ST	REC; ST



NAD83 UTM Zone 11
 June 4, 2021



(C) Side Elevation (looking West)
Scale 1/8" = 1'-0"

148817	X	Updated Foundation and Ducting	04/2/21
148817	X	Updated Foundation and Ducting	04/2/21

WELLS		11/11/2021
ESP No. #8 and Ducting		11/11/2021
General Arrangement		11/11/2021
Side Elevation Looking West		
Project No.	76368-3	3 C
Scale	1/8" = 1'-0"	1/2

BEFORE THE DEPARTMENT OF ENVIRONMENTAL QUALITY
OF THE STATE OF OREGON

IN THE MATTER OF) AMENDMENT TO STIPULATED
Northwest Pipeline LLC) AGREEMENT AND FINAL ORDER
Permittee.) ORDER NO. 01-0038
AMENDMENT NO. 01-0038-A1

Permittee, Northwest Pipeline LLC, and the Department of Environmental Quality (DEQ) hereby agree that:

WHEREAS:

1. Permittee, Northwest Pipeline LLC, operates a natural gas pipeline compressor station located at 18193 Chandler Lane in Baker City, Oregon (the Facility).
2. On May 30, 1997, DEQ issued Title V Operating Permit No. 01-0038-TV-01 (the Permit) to Permittee.
3. On January 12, 2017, DEQ renewed the Permit.
4. The Permit authorizes Permittee to discharge air contaminants associated with its operation of the Facility in conformance with the requirements, limitations and conditions set forth in the Permit.
5. As of December 31, 2017, the Permit had the following plant site emissions limit (PSEL) for sulfur dioxide (SO2), particulate matter of ten microns or less (PM10), and nitrogen oxides (NOx), which constitute round II regional haze pollutants, see OAR 340-223-0020(2): 39 tons per year for SO2, 14 tons per year for PM10, and 542 tons per year for NOx. Specifically, the Permit includes authorization of discharges from the following emissions units, as defined in OAR 340-223-0020(1): _three Cooper GMWA-6 Natural Gas Reciprocating Engines (EU 1 devices C1, C2 and C3), a Cooper GMVH-8 Natural Gas Reciprocating Engine (EU2), a Sellers Natural Gas Boiler (EU4), and a Waukesha Emergency Generator (AUX-1) at the Facility.

1 3. The Permittee agrees to and will ensure compliance with the PSEL reductions
2 schedule or emissions unit replacement schedule and requirements in Section II of this SAFO.

3 4. The PSEL reductions required by this SAFO shall not be banked, credited, or
4 otherwise accessed by Permittee for use in future permitting actions. If Permittee elects
5 replacement as described in Section II, this provision does not apply.

6 5. PSELS for this Facility shall not be increased above those established in this SAFO
7 except as approved in accordance with applicable state and federal permitting regulations.

8 6. The Permittee shall calculate compliance with the PSELS in Section II of this SAFO
9 according to the requirements of the Permit unless an alternative compliance calculation method is
10 required by this SAFO.

11 7. DEQ shall incorporate this SAFO and the conditions in Section II below into the
12 Permit pursuant to OAR 340-218-0200(1)(a)(A) or upon permit renewal, whichever is sooner.

13 8. DEQ may submit this SAFO to the Environmental Protection Agency as part of the
14 State Implementation Plan.

15 9. Permittee waives any and all rights and objections Permittee may have to the form,
16 content, manner of service and timeliness of this SAFO and to a contested case hearing and judicial
17 review of the SAFO, except as stated in Paragraph I.12 of this SAFO.

18 10. In the event EPA does not accept DEQ's Round II Regional Haze State
19 Implementation Plan (SIP) in any manner that impacts the final order, implementation of the Final
20 Order shall be stayed until DEQ and the Permittee modify the Final Order in such a manner as to
21 ensure compliance with the Round II Regional Haze SIP.

22 11. This SAFO shall be binding on Permittee and DEQ (collectively, the Parties) and the
23 Parties respective successors, agents, and assigns. The undersigned representative of the Parties
24 certifies that he, she, or they are fully authorized to execute and bind the Party to this SAFO. No
25 change in ownership, corporate or partnership status of Permittee, or change in the ownership of the
26 properties or businesses affected by this SAFO shall in any way alter Permittee's obligation under
27 this SAFO, unless otherwise approved in writing by DEQ through an amendment to this SAFO.

1 c. From On August 1, 2024, to July 31, 2025 the Permittee’s PSELs for the
2 following pollutants are:

3 i. 5 tons for PM10; 335 tons for NOx; and 2 tons for SO2.

4 d. From August 1, 2025, to July 31, 2026 the Permittee’s PSELs for the following
5 pollutants are:

6 i. 5 tons for PM10; 266 tons for NOx; and 2 tons for SO2.

7 e. On August 1, 2026, the Permittee’s PSELs for the following pollutants are:

8 i. 5 tons for PM10; 193 tons for NOx; and 2 tons for SO2.

9 2. At any point during the phase-out of PSEL, but no later than July 31, 2026,
10 Permittee may request in writing to instead commit to replace EU1 and EU2 at the
11 Facility with new technology to reduce round II regional haze pollutants.

12 a. Permittee agrees to continue to meet PSELs established in this SAFO that are in
13 effect on July 31, 2021, until the proposed replacement project is completed.

14 b. DEQ and Permittee shall meet no later than January 1, 2026, to discuss the
15 project and determine what permitting is needed to approve the proposed
16 replacement.

17 i. The technology proposed by Permittee for replacement shall meet the
18 emission limits and requirements of the most recent New Source
19 Performance Standard in place at the time of the Permittee submitting a
20 permit application for the project.

21 ii. PSELs for round II regional haze pollutants incorporated in the permit
22 modification for the proposed replacement shall be no more than the
23 potential to emit of the proposed replacement, or a Q of 201 tons per
24 year.

25 iii. Permittee shall meet all permitting deadlines and provide a complete
26 permit application to DEQ, including any required permitting fees. Both
27

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

parties will agree to a schedule for permitting of the construction project during this meeting.

- c. Permittee shall submit an application for a construction for replacement project in accordance with Section II.2.b.
- d. Upon completion of the replacement described in Section II.2.b, Permittee shall not operate EU1 and EU2.
- e. Permittee shall complete the replacement described in Section II.2.b no later than July 31, 2031.

Northwest Pipeline LLC (PERMITTEE)

DocuSigned by:

Camilo Amezcua

DABE55A3AC5F45D...

2/1/2022 | 6:52 AM CST

Date

Signature

Camilo Amezcua

Name (print)

VP GM Northwest Pipeline

Title (print)

DEPARTMENT OF ENVIRONMENTAL QUALITY and ENVIRONMENTAL QUALITY COMMISSION

DocuSigned by:

Ali Mirzakhali

5509ABB82903472...

1/31/2022 | 11:32 PM CST

Date

Ali Mirzakhali, Administrator

Air Quality Division

on behalf of DEQ pursuant to OAR 340-223-0110(2)

BEFORE THE DEPARTMENT OF ENVIRONMENTAL QUALITY
OF THE STATE OF OREGON

IN THE MATTER OF) AMENDMENT TO STIPULATED
Northwest Pipeline LLC) AGREEMENT AND FINAL ORDER
Permittee.) ORDER NO. 03-2729
AMENDMENT NO. 03-2729-A1

Permittee, Northwest Pipeline LLC, and the Department of Environmental Quality (DEQ) hereby agree that:

WHEREAS:

1. Permittee operates a natural gas pipeline compressor station located at 15124 S Springwater Road in Oregon City, Oregon (the Facility).
2. On July 1, 1996, DEQ issued Title V Operating Permit No. 03-2729-TV-01 (the Permit) to Permittee.
3. On February 19, 2013, DEQ renewed the Permit.
4. The Permit authorizes Permittee to discharge air contaminants associated with its operation of the Facility in conformance with the requirements, limitations, and conditions set forth in the Permit.
5. As of December 31, 2017, the Permit had the following plant site emissions limit (PSEL) for sulfur dioxide (SO2), particulate matter of ten microns or less (PM10), and nitrogen oxides (NOx), which constitute round II regional haze pollutants, *see* OAR 340-223-0020(2): 39 tons per year for SO2, 14 tons per year for PM10, and 344 tons per year for NOx. Specifically, the Permit authorized these discharges from the following emissions units, as defined in OAR 340-223-0020(1): two Ingersoll Rand Reciprocating Internal Combustion Engines (RICE) (EU1), one Solar skid-mounted Turbine (EU6), and one small boiler (EU5), at the Facility.
6. The Facility is located 43.8 kilometers from Mount Hood Wilderness Area, which is the nearest Class I Area, *see* OAR 340-200-0020 (25), measured in a straight line from the Facility to the Class I Area.

1 7. Based on the definitions and the formula in OAR 340-223-0100(2) the Facility's Q
2 value is 397, d value is 43.8, and ratio of Q divided by d is 9.06.

3 8. Because the Facility has a Title V operating permit and because the Facility has a
4 Q/d value of greater than 5.00, the Facility is subject to the requirements of round II of regional
5 haze. *See* OAR 340-223-0100(1).

6 9. Pursuant to OAR 340-223-0110(2), the Facility would like to enter into a Stipulated
7 Agreement with DEQ for alternative compliance with round II of regional haze and would like to
8 accept a federally enforceable requirement to replace the two RICE that comprise EU1 to reduce
9 round II regional haze pollutants from the Facility which DEQ shall incorporate into a Final Order.
10 *See* OAR 340-223-0110(2)(E).

11 10. DEQ received comments from the U.S. Environmental Protection Agency on the
12 Regional Haze State Implementation Plan, requiring amendments to the SAFO. Additional
13 language is represented in underlined text. Deleted language is represented in strikethrough text.

14 11. DEQ and Permittee agree to the Amended Stipulated Agreement and Final Order
15 Number 03-2729-A1 (the SAFO Amendment), as indicated by the parties' signatures, below.

16 I. AGREEMENT

17 1. DEQ issues this Stipulated Agreement and Final Order (SAFO) pursuant to OAR
18 340-223-0110(2), and it shall be effective upon the date fully executed.

19 2. The Permittee is subject to round II of regional haze, according to OAR 340-223-
20 0100(1).

21 3. The Permittee agrees to and will ensure compliance with the PSEL reductions
22 schedule or emissions unit replacement schedule and requirements in Section II of this SAFO.

23 4. DEQ shall incorporate this SAFO and the conditions in Section II below into the
24 Permit pursuant to OAR 340-218-0200(1)(a)(A) or upon permit renewal, whichever is sooner.

25 5. DEQ may submit this SAFO to the Environmental Protection Agency as part of the
26 State Implementation Plan.

27 6. Permittee waives any and all rights and objections Permittee may have to the form,

1 content, manner of service, and timeliness of this SAFO and to a contested case hearing and judicial
2 review of the SAFO, except as stated in Paragraph I.9 of this SAFO.

3 7. In the event EPA does not accept DEQ's Round II Regional Haze State
4 Implementation Plan (SIP) in any manner that impacts the final order, implementation of the Final
5 Order shall be stayed until DEQ and the Permittee modify the Final Order in such a manner as to
6 ensure compliance with the Round II Regional Haze SIP.

7 8. This SAFO shall be binding on Permittee and DEQ (collectively, the Parties) and the
8 Parties respective successors, agents, and assigns. The undersigned representative of the Parties
9 certifies that he, she, or they are fully authorized to execute and bind the Party to this SAFO. No
10 change in ownership, corporate or partnership status of Permittee, or change in the ownership of the
11 properties or businesses affected by this SAFO shall in any way alter Permittee's obligation under
12 this SAFO, unless otherwise approved in writing by DEQ through an amendment to this SAFO.

13 9. If any unforeseen event occurs that is beyond Permittee's reasonable control and that
14 causes or may cause a delay or deviation in performance of the requirements of this SAFO,
15 Permittee must, within 48 hours of the onset of the event or Permittee's discovery of an event,
16 notify DEQ verbally of the cause of delay or deviation and its anticipated duration, the measures
17 that Permittee has or will take to prevent or minimize the delay or deviation, and the timetable by
18 which Permittee proposes to carry out such measures. Permittee shall confirm in writing this
19 information within five (5) working days of the onset of the event. It is Permittee's responsibility in
20 the written notification to demonstrate to DEQ's satisfaction that the delay or deviation has been or
21 will be caused by unforeseen circumstances beyond the control and despite due diligence of
22 Permittee. If Permittee so demonstrates, DEQ may extend times of performance of related activities
23 under this SAFO as appropriate. Circumstances or events beyond Permittee's control include, but
24 are not limited to, extreme and unforeseen acts of nature, unforeseen strikes, work stoppages, fires,
25 explosion, riot, sabotage, or war. Increased cost of performance or a consultant's failure to provide
26 timely reports are not considered circumstances beyond Permittee's control.

27 10. Facsimile or scanned signatures on this SAFO shall be treated the same as original

1 | signatures.

2 | II. FINAL ORDER

3 | DEQ hereby enters a final order requiring Permittee to comply with the following schedule
4 | and conditions:

5 | 1. The Permittee shall replace two RICE that comprise EU1 at the Facility with new
6 | emissions units to reduce PSELS of round II regional haze pollutants.

7 | a. DEQ and Permittee shall meet no later than July 1, 2026, to discuss the project
8 | and determine what permitting Permittee needs for the replacement.

9 | i. The technology for replacement shall meet the PSELS and requirements
10 | of the most recent New Source Performance Standard (NSPS) in place at
11 | the time of the Permittee submitting a permit application for the
12 | replacement.

13 | ii. PSELS for round II regional haze pollutants incorporated in the Permit
14 | for the replacement shall be no more than the potential to emit of the
15 | replacement, or a Q of 219, whichever is lower.

16 | iii. Permittee shall meet all permitting deadlines and provide a complete
17 | permit application to DEQ, including any required permitting fees. Both
18 | parties will agree to a schedule for permitting of the construction project
19 | during this meeting.

20 | b. Permittee shall submit an application for a construction for replacement project
21 | in accordance with Section II.1.a.

22 | c. Upon completion of the replacement described in Section II.1.~~ba~~, Permittee shall
23 | not operate EU1.

24 | d. Permittee shall complete the replacement of described in Section II.1.a no later
25 | than July 31, 2031.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

2/1/2022 | 6:51 AM CST

Date

DocuSigned by:
Camilo Amezcua
Northwest Pipeline LLC (PERMITTEE)
DABE55A3AC5F45D...

Signature
Camilo Amezcua
Name (print)
VP GM Northwest Pipeline
Title (print)

1/31/2022 | 11:27 PM CST

Date

DocuSigned by:
Ali Mirzakhali
DEPARTMENT OF ENVIRONMENTAL QUALITY and
ENVIRONMENTAL QUALITY COMMISSION
5509ABB82903472...

Ali Mirzakhali, Administrator
Air Quality Division
on behalf of DEQ pursuant to OAR

1 BEFORE THE DEPARTMENT OF ENVIRONMENTAL QUALITY
2 OF THE STATE OF OREGON
3

4 IN THE MATTER OF) STIPULATED AGREEMENT AND
Cascade Pacific Pulp, LLC) FINAL ORDER
5 Halsey Pulp Mill)
6) ORDER NO. 22-3501
Permittee.) AMENDMENT NO. 22-3501-A1

7 Permittee, Cascade Pacific Pulp, LLC, and the Department of Environmental
8 Quality (DEQ) hereby agree that:
9

10 WHEREAS:

- 11 1. Permittee, Cascade Pacific Pulp, LLC, operates a pulp mill located at 30480
American Drive in Halsey, Oregon (the Facility).
12
13 2. On March 2, 1998, DEQ issued Title V Operating Permit No. 22-3501-TV-01 (the
Permit) to Permittee.
14
15 3. On June 30, 2020, DEQ renewed the Permit.
16
17 4. The Permit authorizes Permittee to discharge air contaminants associated with its
operation of the Facility in conformance with the requirements, limitations, and conditions set forth
18 in the Permit.
19
20 5. As of December 31, 2017, the Permit had the following plant site emissions limit
(PSEL) for sulfur dioxide (SO₂), particulate matter of ten microns or less (PM₁₀), and nitrogen
21 oxides (NO_x), which constitute round II regional haze pollutants, *see* OAR 340-223-0020(2) at the
Facility: 851 tons per year for SO₂, 366 tons per year for PM₁₀ and 687 tons per year for NO_x.
22
23 6. The Facility is located 80.4 kilometers from Three Sisters Wilderness, which is the
nearest Class I Area, *see* OAR 340-200-0020(25), measured in a straight line from the Facility to
24 the Class I Area.
25
26 7. Based on the definitions and the formula in OAR 340-223-0100(2) the Facility's Q
value is 1,904; d value is 80.4, and ratio of Q divided by d is 23.7.
27

PR

1 8. Because the Facility has a Title V operating permit and because the Facility has a
2 Q/d value greater than 5.00, the Facility is subject to the requirements of round II of regional haze.
3 See OAR 340-223-0100(1).

4 9. Rather than complying with OAR 340-223-0110(1), the Facility would like to enter
5 into a Stipulated Agreement with DEQ for alternative compliance with round II of regional haze
6 and would like to accept federally enforceable reductions of combined plant site emission limits of
7 round II regional haze pollutants, remove fuel oil #6 as a fuel for Power Boiler #1 (PB1EU), either
8 ~~and~~ install a low NOx burner or commit to replace PB1EU, which DEQ shall incorporate into a
9 Final Order. See OAR 340-223-0110(2)(b)(C).

10 10. DEQ received comments from the U.S. Environmental Protection Agency on the
11 Regional Haze State Implementation Plan, requiring amendments to the SAFO. Additional
12 language is represented in underlined text. Deleted language is represented in strikethrough text.

13 11. DEQ and Permittee agree to the Amended Stipulated Agreement and Final Order
14 Number 22-3501-A1 (the SAFO Amendment), as indicated by the parties' signatures, below.

15 I. AGREEMENT

16 1. DEQ issues this Stipulated Agreement and Final Order (SAFO) pursuant to OAR
17 340-223-0110(2)(b)(C), and it shall be effective upon the date fully executed.

18 2. The Facility is subject to round II of regional haze, according to OAR 340-223-
19 0100(1).

20 3. The Permittee agrees to and will ensure compliance with the PSEL reductions,
21 control install, and fuel limitations in Section II of this SAFO.

22 4. The PSEL reductions required by this SAFO shall not be banked, credited, or
23 otherwise accessed by Permittee for use in future permitting actions, except Permittee may retain
24 unassigned emissions not subject to reduction pursuant to OAR 340-222-0055(3)(c).

25 5. PSELs for this Facility shall not be increased above those established in this SAFO
26 except as approved in accordance with applicable state and federal permitting regulations.

27 *PR*

1 6. The Permittee shall calculate compliance with the PSEs in Section II of this SAFO
2 according to the requirements of the Permit.

3 7. DEQ shall incorporate this SAFO and the conditions in Section II below into the
4 Permit pursuant to 340-218-0200(1)(a)(A), if applicable, or upon permit renewal.

5 8. DEQ may submit this SAFO to the Environmental Protection Agency as part of the
6 State Implementation Plan under the federal Clean Air Act.

7 9. Permittee waives any and all rights and objections Permittee may have to the form,
8 content, manner of service, and timeliness of this SAFO and to a contested case hearing and judicial
9 review of the SAFO.

10 10. In the event EPA does not accept DEQ's Round II Regional Haze State
11 Implementation Plan (SIP) in any manner that impacts the final order, implementation of the Final
12 Order shall be stayed until DEQ and the Permittee modify the Final Order in such a manner as to
13 ensure compliance with the Round II Regional Haze SIP.

14 11. This SAFO shall be binding on Permittee and its respective successors, agents, and
15 assigns. The undersigned representative of Permittee certifies that he, she, or they are fully
16 authorized to execute and bind Permittee to this SAFO. No change in ownership, corporate, or
17 partnership status of Permittee, or change in the ownership of the properties or businesses affected
18 by this SAFO shall in any way alter Permittee's obligation under this SAFO, unless otherwise
19 approved in writing by DEQ through an amendment to this SAFO.

20 12. If any event occurs that is beyond Permittee's reasonable control and that causes or
21 may cause a delay or deviation in performance of the requirements of this SAFO, Permittee must
22 immediately notify DEQ verbally of the cause of delay or deviation and its anticipated duration, the
23 measures that Permittee has or will take to prevent or minimize the delay or deviation, and the
24 timetable by which Permittee proposes to carry out such measures. Permittee shall confirm in
25 writing this information within five (5) business days of the onset of the event. It is Permittee's
26 responsibility in the written notification to demonstrate to DEQ's satisfaction that the delay or
27 deviation has been or will be caused by circumstances beyond the control and despite due diligence

PR

1 of Permittee. If Permittee so demonstrates, DEQ may extend times of performance of related
2 activities under this SAFO as appropriate. Circumstances or events beyond Permittee's control
3 include, but are not limited to, extreme and unforeseen acts of nature, unforeseen strikes, work
4 stoppages, work interference caused by pandemic, fires, explosion, riot, sabotage, or war. Increased
5 cost of performance or a consultant's failure to provide timely reports are not considered
6 circumstances beyond Permittee's control.

7 13. Facsimile or scanned signatures on this SAFO shall be treated the same as original
8 signatures.

9 II. FINAL ORDER

10 The DEQ hereby enters a final order requiring Permittee to comply with the following
11 schedule and conditions:

- 12 1. Permittee agrees to not combust fuel oil #6 at any emission unit in the facility by
13 June 30, 2024.
- 14 2. By January 31, 2022, Permittee shall conduct source testing for NOx at Power
15 Boiler #1 (PB1EU).
 - 16 a. The source test shall be conducted with a steam loading of 80% to 90% designed
17 steam load and the nominal steam load.
 - 18 b. Source testing shall adhere to DEQ Source Sampling Manual, Rev. 2018.
- 19 3. By ~~March 31, 2024~~December 31, 2022, the Permittee shall finalize the design of the
20 low NOx burner to be installed on Power Boiler # 1 (PB1EU).
 - 21 a. Permittee shall design the low NOx burner with an objective of achieving a 33%
22 reduction in NOx emissions from Power Boiler #1 (PB1EU). ~~The overall~~
23 ~~emission reduction with a low NOx burner and the elimination of burning #6~~
24 ~~Fuel Oil is anticipated to be up to or greater than 39%, which will be determined~~
25 ~~by source testing as described in paragraph H.5 and H.6.~~
 - 26 b. By ~~March 31, 2025~~December 31, 2023, Permittee shall construct and install the
27 low NOx Burner in Power Boiler #1 (PB1EU). Beginning on April 1, 2025,

1 Permittee's emissions of NOx from PB1EU shall be at least 20% less than the
2 current emission factor of 282 lb NOx per MM ft3 natural gas and shall be
3 demonstrated to meet this emission reduction through source testing conducted
4 as described in Section II.3.c.

5 c. By June 30, 2025, Permittee shall conduct source testing for NOx at Power
6 Boiler #1 (PB1EU).

7 i. The source test shall be conducted with a steam loading of 80% to 90%
8 designed steam load and the nominal steam load.

9 ii. Source testing shall adhere to DEQ Source Sampling Manual, Rev. 2018.

10 d. By September 30, 2025, Permittee shall submit to DEQ a report that analyzes the
11 data and information collected in source testing from Section II.3.c of this
12 agreement. The report shall include a proposal from Permittee on a revised
13 emission limit in lb NOx per MM ft3 natural gas for PB1EU. If DEQ
14 determines the testing followed the DEQ Source Sampling Manual, Rev. 2018
15 requirements, DEQ will use the proposal to establish final emission limit for
16 incorporation into the Permit pursuant to 340-218-0200(1)(a)(A), if applicable,
17 or upon permit renewal.

18 4. By March 31, 2023, in lieu of complying with the requirements in Section II.3,
19 Permittee may request in writing to instead commit to replace PB1EU at the Facility
20 with new technology to reduce round II regional haze pollutants. If Permittee makes
21 such request to DEQ then:

22 a. DEQ and Permittee shall meet no later than January 1, 2025, to discuss the
23 project and determine what permitting is needed to approve the proposed
24 replacement and a permit application schedule.

25 i. The technology proposed by Permittee for replacement shall meet the
26 emission limits and requirements of the most recent New Source
27

PR

1 Performance Standard in place at the time of the Permittee submitting a
2 permit application for the project.

3 ii. NOx emissions from the proposed replacement meets the emission limits
4 and requirements of the most recent applicable standard in place at the
5 time of the permitting of the new emissions unit pursuant to 340-223-
6 0110(2)(b)(E).

7 iii. Permittee shall meet all permitting deadlines and provide a complete
8 permit application to DEQ, including any required permitting fees. Both
9 parties will agree to a schedule for permitting of the construction project
10 during this meeting.

11 b. Permittee shall submit an application for a construction for replacement project
12 in accordance with, and by the deadline established under, Section II.4.a.

13 c. Upon completion of the replacement, Permittee shall not operate PB1EU.

14 d. Permittee shall complete the replacement no later than July 31, 2031.

15 4. ~~By December 31, 2023, Permittee shall construct and install the low NOx Burner in~~
16 ~~Power Boiler #1 (PB1EU):~~

17 5. ~~By March 31, 2024, Permittee shall conduct source testing for NOx at Power Boiler~~
18 ~~#1 (PB1EU):~~

19 a. ~~The source test shall be conducted with a steam loading of 80% to 90% designed~~
20 ~~steam load and the nominal steam load.~~

21 b. ~~Source testing shall adhere to DEQ Source Sampling Manual, Rev. 2018:~~

22 6. ~~By June 30, 2024, Permittee shall submit to DEQ a report that analyzes the data and~~
23 ~~information collected in source testing from Section II.5 of this agreement. The~~
24 ~~report shall include a proposal from Permittee on revised PSEs. Results from the~~
25 ~~post installation source test will be used to develop the Plant Site Emission Limit for~~
26 ~~#1 Power Boiler, which DEQ shall incorporate into the Permit pursuant to 340-218-~~
27 ~~0200(1)(a)(A), if applicable, or upon permit renewal.~~

PR

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

Cascade Pacific Pulp, LLC (PERMITTEE)

1st day of Feb., 2022
Date

Patrick R Rank
Signature
Patrick R. Rank
Name (print)
VP and GM
Title (print)

DEPARTMENT OF ENVIRONMENTAL QUALITY and
ENVIRONMENTAL QUALITY COMMISSION

2/1/2022
Date

Ali Mirzakhali
Ali Mirzakhali, Administrator
Air Quality Division
on behalf of DEQ pursuant to OAR 340-223-0110(2)