

November 12, 2020

Mr. Brian Hickey
Bio Recycling
2109 Foron Road
Centralia, WA 98531

Subject: Final Approval for Replacement of Wet Scrubbing System for Odor Control, and Installation of Carbon Bed Odor Control System at Septage Receiving Station

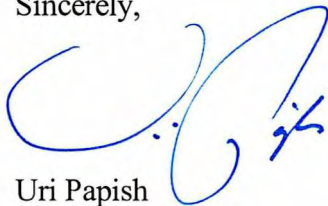
Dear Mr. Hickey:

A final determination to issue Air Discharge Permit 20-3440 has been completed for Air Discharge Permit Application L-713 pursuant to Section 400-110(4) of the General Regulations for Air Pollution Sources of the Southwest Clean Air Agency (SWCAA). Public notice for Air Discharge Permit Application L-713 was published on SWCAA's internet website on July 23, 2020. SWCAA did not receive a request for a public comment period in response to the public notice and has concluded that significant public interest does not exist for this determination. Therefore, a public comment period will not be provided for this permitting action. Electronic copies of Air Discharge Permit 20-3440 and the associated Technical Support Document are available for public review in the permit section of SWCAA's internet website (<http://www.swcleanair.org/permits/adpfinal.asp>). Original copies are enclosed for your files.

This Air Discharge Permit may be appealed directly to the Pollution Control Hearings Board (PCHB) at P.O. Box 40903, Olympia, Washington 98504-0903 within 30 days of receipt as provided in RCW 43.21B.

If you have any comments, or desire additional information, please contact me or Clint Lamoreaux at (360) 574-3058, extension 131.

Sincerely,



Uri Papish
Executive Director

UP: cl

Enclosures: Air Discharge Permit 20-3440 and Technical Support Document



SOUTHWEST CLEAN AIR AGENCY

**AIR DISCHARGE PERMIT
SWCAA 20-3440**

Issued: November 12, 2020

Facility Name: Bio Recycling Corporation – DBA Northwest Fertilizer Company
Physical Location: 2109 Foron Road
Centralia, Washington

SWCAA ID: 2167

REVIEWED BY: *Paul T. Mairose*
Paul T. Mairose, Chief Engineer



APPROVED BY: *Uri Papish*
Uri Papish, Executive Director

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1. Equipment/Activity Identification

ID No.	Generating Equipment/Activity	# of Units	Control Measure/Equipment	# of Units
1	Burnham Boiler	1	Low-NO _x Burner – Induced FGR	1
2	Lime Storage Silo	1	Fabric Filter Dust Collector	1
3	Class A Biosolids Manufacturing Equipment	1	Packed Bed Wet Scrubber	1
4	Septage Receiving	1	Carbon Bed	1

2. Permit Terms and Conditions

The following tables detail the specific terms and conditions of this permit. In addition to the requirements listed below, equipment at this facility may be subject to additional federal, state, and local regulations. The permit term or requirement number is identified in the left-hand column. The permit term or requirement is contained in the middle column. The emission unit, equipment, or activity to which the permit term or condition applies is listed in the right-hand column.

Air Discharge Permit 08-2805 is superseded in its entirety by this Air Discharge Permit.

Emission Limits

No.	Emission Limits	Equipment/Activity
1.	Emissions of nitrogen oxides from the Burnham Boiler must not exceed either of the following: (a) 30 ppmvd @ 3% O ₂ (1-hour average); and (b) 1.67 tons per year.	1
2.	Emissions of carbon monoxide from the Burnham Boiler must not exceed either of the following: (a) 50 ppmvd @ 3% O ₂ (1-hour average); and (b) 1.69 tons per year.	1
3.	Compliance with the short-term emission limits for the Burnham Boiler must be determined using the average results of the most recent source emissions test conducted in accordance with Appendix A. Short-term emission rates of specific pollutants must be calculated using the emission factors presented in the Technical Support Document for this Permit when source emissions test data for the specific pollutant has not been collected. The annual emission rates must be calculated using the results of the most recent source emissions test in units of lb/10 ⁶ scf of natural gas consumed multiplied by the total quantity of fuel consumed. Annual emission rates of specific pollutants must be calculated using the emission factors presented in Section 6 of the Technical Support Document for this Permit when source emissions test data for the specific pollutant has not been collected.	1

No.	Emission Limits	Equipment/ Activity
4.	Visible emissions from the Burnham Boiler must not exceed zero percent opacity for more than 3 minutes in any one hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).	1
5.	Emissions of PM ₁₀ from the Lime Storage Silo must not exceed 0.005 grains per dry standard cubic foot (1-hour average) as measured by EPA Methods 5 or 17. Annual emissions must be calculated using the methodology identified in Section 6 of the Technical Support Document for this Air Discharge Permit.	2
6.	Opacity of emissions from the Lime Storage Silo must not exceed zero percent for more than three minutes in any one hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).	2
7.	Emissions of ammonia from the Class A Biosolids Manufacturing Equipment must not exceed either of the following: (a) 0.016 pounds per hour (1-hour average); and (b) 3.0 parts per million, dry volume basis (1-hour average).	3

Operating Limits and Requirements

No.	Operating Limits and Requirements	Equipment/ Activity
8.	Odors from the facility must not unreasonably interfere with any other property owner's use and enjoyment of their property. Recognized good practice and procedures must be used to reduce odors to a reasonable minimum.	Facilitywide
9.	The Burnham Boiler may only be fired on natural gas.	1
10.	Exhaust from the Burnham Boiler, the Class A Biosolids Manufacturing Equipment Scrubber, and the Septage Receiving Station Carbon Bed must be discharged vertically above the roof level of the building or enclosure in which that particular equipment is housed or immediately adjacent to. Any device that obstructs or prevents vertical discharge is prohibited.	1, 3, 4
11.	The Class A Biosolids Manufacturing Equipment must be enclosed such that all emissions from the process are vented to the Class A Biosolids Manufacturing Equipment Scrubber.	3
12.	The pH of the scrubbing liquor for the Class A Biosolids Manufacturing Equipment Scrubber must not exceed 3.8.	3
13.	The scrubber liquor recirculation rate for the Class A Biosolids Manufacturing Equipment Scrubber must be at least 20 gallons per minute during operation.	3
14.	The scrubbing liquor blowdown rate for the Class A Biosolids Manufacturing Equipment Scrubber must be at least 1.2 gallon per hour and must not exceed 3.9 gallons per hour.	3

No.	Operating Limits and Requirements	Equipment/ Activity
15.	Upset conditions must be reported to SWCAA as soon as possible after discovery. A pH excursion lasting less than 10 minutes in duration in any 60 minute period and with a maximum deviation of less than ½ of a pH point outside the permitted pH limit is not considered an upset condition and is not required to be reported unless an excess emission is associated with the excursion. A flow excursion lasting less than 10 minutes in duration in any 60 minute period with a maximum deviation of less than 10% outside the flow limit must not be considered an upset condition and is not required to be reported unless an excess emission is associated with the excursion.	3
16.	The equipment specified in ADP Application L-713 and this Permit must be maintained and operated in total and continuous conformity with the conditions identified in this Permit. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this Permit, including directing the facility to cease operations until corrective action can be completed.	Facilitywide
17.	The Class A Biosolids Manufacturing Equipment Scrubber and the Septage Receiving Station Carbon Bed must be operated properly and maintained in working order. All equipment malfunctions or improper operations of the above equipment must be corrected promptly after identification.	3, 4
18.	The Class A Biosolids Manufacturing Equipment Scrubber and the Septage Receiving Station Carbon Bed must be inspected weekly for signs of equipment malfunctions or improper operation. The differential pressure across each system must be recorded during each inspection. For the purposes of this requirement, improper operation or equipment malfunction is presumed if the unit is emitting excessive odor. All equipment malfunctions or improper operations must be corrected promptly.	3, 4
19.	Each pollution control device must be operated whenever the processing equipment served by that control device is in operation. Control devices must be operated and maintained in accordance with the manufacturer's specifications. Furthermore, control devices must be operated in a manner that minimizes emissions. During startup of the Class A Biosolids Manufacturing Equipment Scrubber, this may mean operating at a lower pH initially.	3, 4
20.	<p>If the hydrogen sulfide concentration at the exhaust of a Septage Receiving Station Carbon Bed exceeds 0.5 ppmvd, then the media must be replaced or other corrective action taken to reduce the exhaust concentration to no more than 0.5 ppmvd as soon as practical but no longer than 30 days after discovery.</p> <p>If a single hydrogen sulfide measurement indicates an exhaust concentration over 0.5 ppmvd, the permittee may choose to re-sample the carbon bed exhaust prior to commencing appropriate corrective action or media replacement. Re-sampling must be conducted no later than the next operating day. The need for corrective action or media replacement is confirmed if two consecutive samples exceed 0.5 ppmvd hydrogen sulfide.</p>	4
21.	The adsorption media in the Septage Receiving Station Carbon Bed must be replaced at least once every 10 years unless a longer time period can be justified by analysis of the remaining media.	4

No.	Operating Limits and Requirements	Equipment/ Activity
22.	Emission units identified in this Permit must be maintained and operated in total and continuous conformity with the conditions identified in this Permit. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this Permit, including directing the facility to cease operations until corrective action can be completed.	Facilitywide

Monitoring and Recordkeeping Requirements

No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity
23.	The permittee must perform monthly inspections of the Lime Storage Silo, the Class A Biosolids Biosolids Manufacturing Equipment and scrubber, and the Septage Receiving Station and carbon bed during daylight hours to identify and prevent excessive odors or emissions violations. Whenever operational problems are observed during the monthly inspection or any other time, the permittee must investigate to determine the cause of the problem. The permittee must initiate corrective action within 2 hours of observing the problem. Within one working day of initial discovery, the permittee must resolve the operational problem, or notify SWCAA by the next working day of progress made in resolving the operational problem. The results of all monthly inspections and corrective actions must be recorded and maintained accessible for inspection.	2, 3, 4

No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity
24.	<p>The following information must be collected, recorded at the intervals specified below, and readily available on-site for inspection:</p> <ul style="list-style-type: none"> (a) The total number of hours that the Lime Storage Silo is actively vented (venting is expected to only occur during loading) must be determined and recorded for each calendar year; (b) The amount of natural gas consumed by the Burnham Boiler must be recorded at least once per month; (c) The pH of the scrubbing liquor in the Class A Biosolids Manufacturing Equipment Scrubber must be monitored continuously and recorded at least once per day of operation. In the event that the Class A Biosolids Manufacturing Equipment does not operate in a given day, that fact must be noted in the log instead of the pH; (d) The scrubber recirculation rate and the blowdown rate for the Class A Biosolids Manufacturing Equipment Scrubber must monitored continuously and recorded daily. In the event that the Class A Biosolids Manufacturing Equipment does not operate in a given day, that fact must be noted in the log instead of the scrubber recirculation rate and blowdown rate; (e) The number of hours the Class A Biosolids Manufacturing Equipment is operated must be recorded for each calendar year; (f) The differential pressure gauge reading for the Lime Storage Silo Dust Collector must be confirmed to be operational and the reading must be recorded once per month during loading. If no loading is conducted during a calendar month, that fact must be noted in the log instead of a pressure reading; (g) Upset conditions that cause excess emissions must be recorded for each occurrence; and (h) All air quality related complaints, including odor complaints, received by the permittee and the results of any subsequent investigation or corrective must be recorded for each occurrence. 	Facilitywide
25.	With the exception of data logged by a computerized data acquisition system, each record required by this Permit must include the date and the name of the person making the record entry.	Facilitywide
26.	All records required by this Permit must be kept on site for a minimum period of no less than three years and must be readily available for inspection by SWCAA representatives.	Facilitywide

Emission Monitoring and Testing Requirements

No.	Emission Monitoring and Testing Requirements	Equipment/ Activity
27.	Source emissions testing of the Burnham Boiler must be conducted no later than the end of July 2021 and no later than the end of July every 5 years thereafter unless an alternative schedule has been approved by SWCAA. Tests conducted more than three months before the required due date will not satisfy the periodic source emission testing requirement without prior approval from SWCAA. All required testing must be conducted in accordance with Appendix A of this Permit.	1

No.	Emission Monitoring and Testing Requirements	Equipment/ Activity
28.	Performance monitoring of the Burnham Boiler must be conducted as described in Appendix B of this Permit at least once each year, no later than the end of July unless an alternative test schedule has been approved by SWCAA. Performance monitoring is not required in any month during which the boiler is not utilized or during any calendar year during which source emissions testing is conducted.	1
29.	Ammonia concentrations in the packed bed scrubber exhaust must be determined at least once per calendar month except during calendar months during which the Class A Biosolids Manufacturing Equipment is not utilized. During the first year of operation, the inlet ammonia concentration must be measured with each outlet concentration measurement. A colorimetric detector tube with a maximum range of 30 ppm may be used to measure the outlet ammonia concentrations. Other measurement methods may be used with pre-approval from SWCAA. The scrubber exhaust flow rate must be measured concurrently with each required source emissions test of the Burnham Boiler in accordance with Appendix C of this Permit.	3
30.	The hydrogen sulfide content of the Septage Receiving Station Carbon Bed must be measured each calendar month using a colorimetric detector tube or other method pre-approved by SWCAA.	4

Reporting Requirements

No.	Reporting Requirements	Equipment/ Activity
31.	The permittee must notify SWCAA in writing within ten (10) days after completing initial installation of the new equipment. This will allow proper inspections and observations to be conducted for the new equipment.	3, 4
32.	<p>Excess emissions must be reported to SWCAA as follows:</p> <ul style="list-style-type: none"> (a) As soon as possible, but no later than 12 hours after discovery for emissions that represent a potential threat to human health or safety; (b) As soon as possible, but no later than 48 hours after discovery for emissions which the permittee wishes to claim as unavoidable pursuant to SWCAA 400-107; and (c) No later than 30 days after the end of the month of discovery for all other excess emissions. 	Facilitywide
33.	Deviations from permit conditions must be reported no later than 30 days after the end of the month during which the deviation is discovered.	Facilitywide
34.	The results of source emissions and flow testing conducted in accordance with Appendices A and C must be reported to SWCAA within 45 days of test completion.	1, 3
35.	The results of performance monitoring conducted in accordance with Appendix B must be reported to SWCAA within 15 days of test completion	1
36.	All air quality related complaints received by the Permittee regarding activities controlled by the Permittee must be reported to SWCAA within three days of receipt.	Facilitywide

No.	Reporting Requirements	Equipment/ Activity
37.	<p>The following emission-related information must be reported to SWCAA by March 15th for the previous calendar year:</p> <ul style="list-style-type: none"> (a) The total amount of natural gas consumed by the Burnham Boiler; (b) The total number of hours the Lime Storage Silo was actively vented; (c) The results of all ammonia monitoring of the Class A Biosolids Manufacturing Equipment Scrubber; (d) The results of all hydrogen sulfide monitoring of the Septage Receiving Station Carbon Bed; (e) The total number of hours the Class A Biosolids Manufacturing Equipment operated; and (f) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs). 	Facilitywide

3. General Provisions

No.	General Provisions
A.	The equipment specified in this Permit must be maintained and operated in total and continuous conformity with the conditions identified in this Permit. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this Permit, including directing the facility to cease operations until corrective action can be completed.
B.	For the purpose of ensuring compliance with this Permit, duly authorized representatives of the Southwest Clean Air Agency must be permitted access to the permittee's premises and the facilities being constructed, owned, operated and/or maintained by the permittee for the purpose of inspecting said facilities. These inspections are required to determine the status of compliance with this Permit and applicable regulations and to perform or require such tests as may be deemed necessary.
C.	The provisions, terms and conditions of this Permit shall be deemed to bind the permittee, its officers, directors, agents, servants, employees, successors and assigns, and all persons, firms, and corporations acting under or for the permittee.
D.	The requirements of this Permit shall survive any transfer of ownership of the source or any portion thereof.
E.	This Permit must be posted conspicuously at or be readily available near the source.
F.	Approval to construct, install, or modify specific pollution generating or control equipment becomes invalid if construction or installation is not commenced within eighteen months after the date of issuance of this Permit, if construction or installation is discontinued for a period of eighteen months or more, or if construction or installation is not completed within a reasonable time.
G.	This Permit does not supersede requirements of other Agencies with jurisdiction and further, this Permit does not relieve the permittee of any requirements of any other governmental Agency. In addition to this Permit, the permittee may be required to obtain permits or approvals from other agencies with jurisdiction.

No.	General Provisions
H.	Compliance with the terms of this Permit does not relieve the permittee from the responsibility of compliance with SWCAA General Regulations for Air Pollution Sources, previously issued Regulatory Orders, RCW 70.94, Title 173 WAC or any other applicable emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply.
I.	If any provision of this Permit is held to be invalid, all unaffected provisions of the Permit shall remain in effect and be enforceable.
J.	No change in this Permit shall be made or be effective except as may be specifically set forth by written order of the Southwest Clean Air Agency upon written application by the permittee for the relief sought.
K.	The Southwest Clean Air Agency may, in accordance with RCW 70.94 impose such conditions as are reasonably necessary to assure the maintenance of compliance with the terms of this Permit, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act.

Burnham Boiler Emission Testing Requirements

1. Introduction

- a. The purpose of this testing is to quantify emissions from the Burnham Boiler and to provide an adequate assurance of compliance with the terms and conditions of this Air Discharge Permit.

2. Testing Requirements

- a. Source emissions testing of the Burnham Boiler must be conducted no later than the end of July 2021 and no later than the end of July every 5 years thereafter unless an alternative schedule has been approved by SWCAA. Tests conducted more than three months before the required due date will not satisfy the periodic source emission testing requirement without prior approval from SWCAA. Unless otherwise directed or approved by SWCAA, testing for each constituent must consist of a minimum of three sampling runs of the duration specified below.

Constituent / Parameter	Test Method or Equivalent ¹	Minimum Test Run Duration
Stack gas velocity, flow rate	EPA Methods 1 and 2	N/A
O ₂ and CO ₂ concentrations	EPA Methods 3 or 3A	60 minutes
Stack gas moisture content	EPA Method 4	60 minutes
Nitrogen oxides	EPA Method 7E	60 minutes
Carbon monoxide	EPA Method 10	60 minutes

¹ The use of an alternate or equivalent test method must be pre-approved in writing by SWCAA.

- b. A comprehensive test plan must be submitted to SWCAA for review and approval at least 10 business days prior to each test.
- c. SWCAA personnel must be notified at least 5 days prior to each testing campaign so that they may be present during testing.

3. Source Operation

- a. A complete record of operational parameters applicable to the testing, including but not limited to, boiler load, startups and shutdowns must be kept during emissions testing to correlate operations with emissions and must be recorded in the final report of the test results.
- b. Source operations during emissions testing must be representative of maximum intended operating conditions.

Appendix A
Burnham Boiler Emission Testing Requirements

4. Reporting

The results of all required testing must be submitted to SWCAA within 45 days of test completion. Unless otherwise directed by SWCAA, a single hard copy of each report and an electronic copy (e.g. portable document format) of each report must be submitted. Each report must include:

- a. A description of the source including manufacturer, model number and design capacity of the equipment, and the location of the sample ports or test locations.
- b. Time and date of the test and identification and qualifications of the personnel involved.
- c. A summary of results, reported in units and averaging periods consistent with the applicable emission standard or limit (CO and NO_x concentrations corrected to 3% O₂).
- d. A summary of control system or equipment operating conditions including boiler firing rate or fuel consumption rate.
- e. A summary of production related parameters, including biosolids processing rate.
- f. A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation.
- g. A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation.
- h. Copies of field data and example calculations.
- i. Chain of custody information.
- j. Calibration documentation.
- k. Discussion of any abnormalities associated with the results.
- l. A statement signed by the senior management official of the testing firm certifying the validity of the source test report.

5. Changes to Testing Requirements

The emission test must be conducted as specified in the sections above. The Permittee may submit a written request to SWCAA for approval of minor modifications to the requirements above or to the testing schedule. Upon review of the request and in accordance with EPA delegation, SWCAA will inform the Permittee in writing of any approved modifications

Appendix B
Burnham Boiler Performance Monitoring Requirements

1. Introduction

- a. The purpose of periodically monitoring the exhaust of the boiler is to minimize emissions and provide a reasonable assurance that the unit is operating properly.
- b. Periodic monitoring may be conducted with an electrochemical cell combustion analyzer, analyzers used for reference method testing, or other analyzers pre-approved by SWCAA.

2. Monitoring Requirements

- a. Performance monitoring to determine emission concentrations of the following constituents must be conducted for the Burnham Boiler no later than the end of July during each calendar year unless an alternative test schedule has been approved by SWCAA. Performance monitoring conducted more than three months before the required due date will not satisfy the periodic performance monitoring requirement without prior approval from SWCAA. Performance monitoring is not required in any month during which that boiler is not utilized or during any calendar year during which source emissions testing is conducted.

Constituents to be Measured

Carbon Monoxide (CO)

Nitrogen Oxides (NO_x)

Oxygen (O₂)

- b. Source operation during monitoring must be representative of maximum intended operating conditions during that year.

3. Minimum Quality Assurance/Quality Control Measures

- a. The analyzer(s) response to span (calibration) gas of a known concentration (reference) must be determined before and after testing. No more than 12 hours may elapse between response checks. The test results are invalid if the analyzer zero or span drift exceeds 10% of the span value. The test may not be started until the calibration error (the difference between the reference concentration and the analyzer response) is no more than 10% of the span value.
- b. The CO and NO_x span gas concentrations must be no less than 50% and no more than 200% of the emission concentration corresponding to the permitted emission limit. A lower concentration span gas may be used if it is more representative of measured concentrations. Ambient air may be used to zero the CO and NO_x cells/analyzer(s) and span the oxygen cell/analyzer.
- c. Sampling of each unit must consist of at least 1 test consisting of at least 5 minutes of data collection following a "ramp-up phase." The ramp-up phase ends when analyzer readings have stabilized (less than 5%/minute change in emission concentration). Emission concentrations must be recorded at least once every 30 seconds during testing. All test data collected following the ramp-up phase(s) must be reported to SWCAA. Alternative testing methods may be utilized provided pre-approval is obtained from SWCAA.

Burnham Boiler Performance Monitoring Requirements

3. Minimum Quality Assurance/Quality Control Measures (continued)

If the test results from any performance monitoring event indicate that emission concentrations may exceed the relevant concentrations identified below, the permittee must either perform 60 minutes of additional monitoring to more accurately quantify CO and NO_x emissions or initiate corrective action. Additional testing or corrective action must be initiated as soon as practical but no later than three days after the potential exceedance is identified. Corrective action includes tuning, maintenance by service personnel, limitation of unit load, or other action taken to maintain compliance with permitted limits. Monitoring of unit emissions must be conducted within three days following completion of any corrective action to confirm that the corrective action has been effective. Corrective action must be pursued until observed emission concentrations no longer exceed the relevant concentrations indicated below on a 1-hour average basis. Initiation of corrective action does not shield the permittee from enforcement actions by SWCAA.

Unit	NO _x (ppmvd @ 3% O ₂ , 1-hour average)	CO (ppmvd @ 3% O ₂ , 1-hour average)
Burnham Boiler	30	50

4. Reporting

- a. All monitoring results must be recorded at the facility and reported to SWCAA in writing using a format designated by the Agency. Results must be reported within 15 calendar days of completion. The following information must be included in the report:
- (1) Time and date of the emissions evaluation;
 - (2) Identification of the personnel involved;
 - (3) Identification of the affected unit;
 - (4) A summary of results (NO_x, CO, O₂, etc.), reported in units consistent with the applicable emission standard(s) or limit(s);
 - (5) A summary of equipment operating conditions (e.g., firing rate, fuel flow, stack temperature, etc.);
 - (6) A description of the evaluation methods or procedures used, including all field data, quality assurance/quality control procedures and documentation; and
 - (7) Analyzer response check and calibration error documentation.
- b. Individual data points must be reported as read. Final average monitoring results must be corrected to 3% O₂ in the exhaust gas and adjusted to reflect analyzer response to zero and span gases.

5. Changes to Testing Requirements

The emission test must be conducted as specified in the sections above. The Permittee may submit a written request to SWCAA for approval of minor modifications to the requirements above or to the testing schedule. Upon review of the request and in accordance with EPA delegation, SWCAA will inform the Permittee in writing of any approved modifications

Stack Flow Measurement Requirements Class A Biosolids Manufacturing Equipment Scrubber

1. Introduction

- a. The purpose of this testing is to quantify the flow rate from the Class A Biosolids Manufacturing Equipment Scrubber.

2. Testing Requirements

- a. The flow measurements must be conducted concurrently with each required source emissions test of the Burnham Boiler. Unless otherwise specified, testing for each constituent must consist of a minimum of three sampling runs of the duration specified below.

Constituent / Parameter	Test Method or Equivalent¹	Minimum Test Run Duration
Stack gas velocity, flow rate	EPA Methods 1 and 2	N/A
O ₂ and CO ₂ concentrations	EPA Methods 3 or 3A (ambient levels of O ₂ /CO ₂ may be assumed)	60 minutes
Stack gas moisture content	EPA Method 4 or may assume saturation at the measured temperature	60 minutes

¹ The use of an alternate or equivalent test method must be pre-approved in writing by SWCAA.

3. Source Operation

- a. A complete record of operational parameters applicable to the testing, including but not limited to, scrubbing liquor flow, scrubber differential pressure, startups and shutdowns must be kept during emissions testing to correlate operations with emissions and must be recorded in the final report of the test results.
- b. Source operations during emissions testing must be representative of maximum intended operating conditions.

**Stack Flow Measurement Requirements
Class A Biosolids Manufacturing Equipment Scrubber**

4. Reporting

The results of all required testing must be submitted to SWCAA within 45 days of test completion. Unless otherwise directed by SWCAA, a single hard copy of each report and an electronic copy (e.g. portable document format) of each report must be submitted. This report may be combined with the report for the Burnham Boiler. Each report must include:

- a. A description of the source including manufacturer, model number and design capacity of the equipment, and the location of the sample ports or test locations.
- b. Time and date of the test and identification and qualifications of the personnel involved.
- c. A summary of results.
- d. A summary of control system or equipment operating conditions including scrubbing liquor flow, scrubber differential pressure.
- e. A summary of production related parameters.
- f. A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation.
- g. A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation.
- h. Copies of field data and example calculations.
- i. Chain of custody information.
- j. Calibration documentation.
- k. Discussion of any abnormalities associated with the results.
- l. A statement signed by the senior management official of the testing firm certifying the validity of the source test report.

State Environmental Policy Act

DETERMINATION OF SEPA EXEMPT - SWCAA 20-040

Description of proposal:

ADP Application L-713: The proponent has applied for a permit to replace a wet scrubber that is currently used to control odorous emissions from the Class A Biosolids Manufacturing Equipment and the Septage Receiving Station. A new scrubber will control odorous emissions from the Class A Biosolids Manufacturing Equipment and a new carbon bed will control odorous emissions from the Septage Receiving Station. No increase in emissions is associated with this project. This permitting action is not expected to have any impact on any other element of the environment including traffic, noise, glare, housing, or recreation opportunities.

Proponent:

Bio Recycling Corporation

Location of proposal, including street address if any:

2109 Foron Road, Centralia, Lewis County, Washington 98531

Lead agency: Southwest Clean Air Agency

The lead agency for this proposal has determined that the proposed project is exempt from SEPA under WAC 197-11-800(3) as follows: "The repair, remodeling, maintenance, or minor alteration of existing private or public structures, facilities or equipment, including utilities, recreation, and transportation facilities involving no material expansions or changes in use beyond that previously existing; ...". The proposed project is identified as maintenance of existing equipment and as such it does not have a probable significant impact on the environment. Neither an environmental checklist nor an environmental impact statement (EIS) is required under RCW 43.21C.030(2)(c). This decision was made by the lead agency after review of the proponent's proposal and the information on file with the lead agency. This information is available to the public on request.



This project/permitting action by SWCAA is SEPA exempt.

Responsible official: Paul T. Mairose, P.E.

Position/title: Chief Engineer

Address: Southwest Clean Air Agency

11815 NE 99th St, Suite 1294

Vancouver, WA 98682-2322

Phone: (360) 574-3058 ext. 130

Signature: Paul T. Mairose

Date: 11/12/2020

