

November 12, 2020

Mr. Justin Serface
City of Vancouver – Facilities Management
PO Box 1995
Vancouver, WA 98668

Subject: Final Approval for Operation of Existing Facilities Equipment

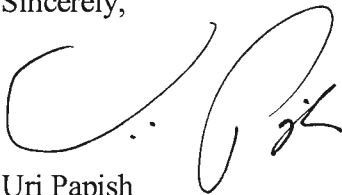
Dear Mr. Serface:

A final determination to issue Air Discharge Permit 20-3441 has been completed for Air Discharge Permit Application CL-3059 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 CL-3059 was published on SWCAA's internet website on October 12, 2018. 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 20-3441 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 Vanessa McClelland at (360) 574-3058, extension 129.

Sincerely,



Uri Papish
Executive Director

UP: vm

Enclosures ADP 20-3441 and Technical Support Document



SOUTHWEST CLEAN AIR AGENCY

**AIR DISCHARGE PERMIT
SWCAA 20-3441**

Issued: November 12, 2020

Facility Name: City of Vancouver – Facilities Management
Physical Location: 415 W 6th Street
Vancouver, WA 98668

SWCAA ID: 2331

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.	Equipment/Activity	Control Equipment / Measure
1	City Hall – 1 Boiler (2.0 MMBtu/hr), 1 Heater (0.125 MMBtu/hr)	Low Sulfur Fuel (natural gas)
2	City Hall – Emergency Generator Engine (Cat 375 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
3	City Hall – Emergency Generator Engine (Cat 800 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Low Sulfur Fuel (natural gas), Limited Operation
4	Firstenburg Community Center – 4 Boilers (1.0 MMBtu/hr each)	Low Sulfur Fuel (natural gas)
5	Firstenburg Community Center – Emergency Generator Engine (Perkins 40.5 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
6	Firstenburg Community Center – Fire Pump Engine (John Deere 51 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
7	Marshall Community Center – 2 Boilers (2.0 MMBtu/hr, 1.999 MMBtu/hr), 1 Heater (0.25 MMBtu/hr)	Low Sulfur Fuel (natural gas)
8	Marshall Community Center – Emergency Generator Engine (Cat 480 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Low Sulfur Fuel (natural gas), Limited Operation
9	Luepke Senior Center – 1 Heater (0.199 MMBtu/hr), 2 Furnaces (0.132 MMBtu/hr, 0.066 MMBtu/hr)	Low Sulfur Fuel (natural gas)
10	Luepke Senior Center – Emergency Generator Engine (Cat 250 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Low Sulfur Fuel (natural gas), Limited Operation
11	Fire Station 10 – Emergency Generator Engine (Cummins 320 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
12	Fire Station 9 – Emergency Generator Engine (Cummins 277 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
13	Fire Station 8 – Emergency Generator Engine (Cummins 155 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
14	Fire Station 7 – Emergency Generator Engine (Perkins 168 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
15	Fire Station 6 – Emergency Generator Engine (Cummins 105 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
16	Fire Station 5 – 1 Boiler (0.6 MMBtu/hr), 1 Heater (0.199 MMBtu/hr)	Low Sulfur Fuel (natural gas)
17	Fire Station 5 – Emergency Generator Engine (AC 335 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation

ID No.	Equipment/Activity	Control Equipment / Measure
18	Fire Station 4 – Emergency Generator Engine (Cummins 277 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
19	Fire Station 3 – Emergency Generator Engine (Onan 20 bhp)	Low Sulfur Fuel (propane), Limited Operation
20	Fire Station 2 – Emergency Generator Engine (Cummins 176 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
21	Fire Station 1 – Emergency Generator Engine (Cummins 176 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
22	Police – West Precinct – Emergency Generator Engine (John Deere 335 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
23	Police – East Precinct – Emergency Generator Engine (Cat 335 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
24	Police – Headquarters – Emergency Generator Engine (John Deere 40 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
25	Police – Evidence Storage – Emergency Generator Engine (John Deere 53 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation

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.

The permit requirements for the equipment permitted at 415 West 6th Street in Air Discharge Permit (ADP) 07-2729 are superseded in their entirety by this ADP. The remainder of ADP 07-2729 will remain in effect. Equipment proposed under Small Unit Notifications (SUN) SUN-137, SUN-138, SUN-139 and SUN-140 for the Firstenberg Community Center are incorporated into this ADP.

Emission Limits

Req.	Emission Limits	Equipment/Activity ID															
1.	<p>Emissions from the City Hall Aerco Boiler must not exceed:</p> <table border="0"> <tr> <td></td> <td style="text-align: center;">Emission Limit</td> <td></td> </tr> <tr> <td></td> <td style="text-align: center;">ppmvd @ 3% O₂</td> <td style="text-align: center;">Emission Limit</td> </tr> <tr> <td><u>Pollutant</u></td> <td style="text-align: center;"><u>(1-hour average)</u></td> <td style="text-align: center;"><u>tons (Annual)</u></td> </tr> <tr> <td>NO_x</td> <td style="text-align: center;">30</td> <td style="text-align: center;">0.32</td> </tr> <tr> <td>CO</td> <td style="text-align: center;">50</td> <td style="text-align: center;">0.32</td> </tr> </table> <p>Annual emissions must be calculated using the emission factors presented in the Technical Support Document for this Air Discharge Permit unless more recent source test data has been collected.</p>		Emission Limit			ppmvd @ 3% O ₂	Emission Limit	<u>Pollutant</u>	<u>(1-hour average)</u>	<u>tons (Annual)</u>	NO _x	30	0.32	CO	50	0.32	1
	Emission Limit																
	ppmvd @ 3% O ₂	Emission Limit															
<u>Pollutant</u>	<u>(1-hour average)</u>	<u>tons (Annual)</u>															
NO _x	30	0.32															
CO	50	0.32															

Req.	Emission Limits	Equipment/ Activity ID												
2.	<p>Emissions from the Firstenburg Community Center Aerco Boiler 1 must not exceed:</p> <table data-bbox="196 306 878 485"> <thead> <tr> <th></th> <th>Emission Limit ppmvd @ 3% O₂</th> <th>Emission Limit tons (Annual)</th> </tr> </thead> <tbody> <tr> <td><u>Pollutant</u></td> <td><u>(1-hour average)</u></td> <td><u>(1-hour average)</u></td> </tr> <tr> <td>NO_x</td> <td>30</td> <td>0.16</td> </tr> <tr> <td>CO</td> <td>50</td> <td>0.16</td> </tr> </tbody> </table> <p>Annual emissions must be calculated using the emission factors presented in the Technical Support Document for this Air Discharge Permit unless more recent source test data has been collected.</p>		Emission Limit ppmvd @ 3% O ₂	Emission Limit tons (Annual)	<u>Pollutant</u>	<u>(1-hour average)</u>	<u>(1-hour average)</u>	NO _x	30	0.16	CO	50	0.16	4
	Emission Limit ppmvd @ 3% O ₂	Emission Limit tons (Annual)												
<u>Pollutant</u>	<u>(1-hour average)</u>	<u>(1-hour average)</u>												
NO _x	30	0.16												
CO	50	0.16												
3.	<p>Emissions from the Firstenburg Community Center Aerco Boiler 2 must not exceed:</p> <table data-bbox="196 726 878 905"> <thead> <tr> <th></th> <th>Emission Limit ppmvd @ 3% O₂</th> <th>Emission Limit tons (Annual)</th> </tr> </thead> <tbody> <tr> <td><u>Pollutant</u></td> <td><u>(1-hour average)</u></td> <td><u>(1-hour average)</u></td> </tr> <tr> <td>NO_x</td> <td>30</td> <td>0.16</td> </tr> <tr> <td>CO</td> <td>50</td> <td>0.16</td> </tr> </tbody> </table> <p>Annual emissions must be calculated using the emission factors presented in the Technical Support Document for this Air Discharge Permit unless more recent source test data has been collected.</p>		Emission Limit ppmvd @ 3% O ₂	Emission Limit tons (Annual)	<u>Pollutant</u>	<u>(1-hour average)</u>	<u>(1-hour average)</u>	NO _x	30	0.16	CO	50	0.16	4
	Emission Limit ppmvd @ 3% O ₂	Emission Limit tons (Annual)												
<u>Pollutant</u>	<u>(1-hour average)</u>	<u>(1-hour average)</u>												
NO _x	30	0.16												
CO	50	0.16												
4.	<p>Emissions from the Firstenburg Community Center Aerco Boiler 3 must not exceed:</p> <table data-bbox="196 1146 878 1325"> <thead> <tr> <th></th> <th>Emission Limit ppmvd @ 3% O₂</th> <th>Emission Limit tons (Annual)</th> </tr> </thead> <tbody> <tr> <td><u>Pollutant</u></td> <td><u>(1-hour average)</u></td> <td><u>(1-hour average)</u></td> </tr> <tr> <td>NO_x</td> <td>30</td> <td>0.16</td> </tr> <tr> <td>CO</td> <td>50</td> <td>0.16</td> </tr> </tbody> </table> <p>Annual emissions must be calculated using the emission factors presented in the Technical Support Document for this Air Discharge Permit unless more recent source test data has been collected.</p>		Emission Limit ppmvd @ 3% O ₂	Emission Limit tons (Annual)	<u>Pollutant</u>	<u>(1-hour average)</u>	<u>(1-hour average)</u>	NO _x	30	0.16	CO	50	0.16	4
	Emission Limit ppmvd @ 3% O ₂	Emission Limit tons (Annual)												
<u>Pollutant</u>	<u>(1-hour average)</u>	<u>(1-hour average)</u>												
NO _x	30	0.16												
CO	50	0.16												
5.	<p>Emissions from the Firstenburg Community Center Aerco Boiler 4 must not exceed:</p> <table data-bbox="196 1566 878 1745"> <thead> <tr> <th></th> <th>Emission Limit ppmvd @ 3% O₂</th> <th>Emission Limit tons (Annual)</th> </tr> </thead> <tbody> <tr> <td><u>Pollutant</u></td> <td><u>(1-hour average)</u></td> <td><u>(1-hour average)</u></td> </tr> <tr> <td>NO_x</td> <td>30</td> <td>0.16</td> </tr> <tr> <td>CO</td> <td>50</td> <td>0.16</td> </tr> </tbody> </table> <p>Annual emissions must be calculated using the emission factors presented in the Technical Support Document for this Air Discharge Permit unless more recent source test data has been collected.</p>		Emission Limit ppmvd @ 3% O ₂	Emission Limit tons (Annual)	<u>Pollutant</u>	<u>(1-hour average)</u>	<u>(1-hour average)</u>	NO _x	30	0.16	CO	50	0.16	4
	Emission Limit ppmvd @ 3% O ₂	Emission Limit tons (Annual)												
<u>Pollutant</u>	<u>(1-hour average)</u>	<u>(1-hour average)</u>												
NO _x	30	0.16												
CO	50	0.16												

Req.	Emission Limits	Equipment/ Activity ID												
6.	<p>Emissions from the Marshall Community Center Boiler 1 must not exceed:</p> <table border="0" data-bbox="203 304 876 493"> <thead> <tr> <th></th> <th style="text-align: center;">Emission Limit ppmvd @ 3% O₂</th> <th style="text-align: center;">Emission Limit</th> </tr> <tr> <th><u>Pollutant</u></th> <th><u>(1-hour average)</u></th> <th><u>tons (Annual)</u></th> </tr> </thead> <tbody> <tr> <td>NO_x</td> <td style="text-align: center;">30</td> <td style="text-align: center;">0.32</td> </tr> <tr> <td>CO</td> <td style="text-align: center;">50</td> <td style="text-align: center;">0.32</td> </tr> </tbody> </table> <p>Annual emissions must be calculated using the emission factors presented in the Technical Support Document for this Air Discharge Permit unless more recent source test data has been collected.</p>		Emission Limit ppmvd @ 3% O ₂	Emission Limit	<u>Pollutant</u>	<u>(1-hour average)</u>	<u>tons (Annual)</u>	NO _x	30	0.32	CO	50	0.32	7
	Emission Limit ppmvd @ 3% O ₂	Emission Limit												
<u>Pollutant</u>	<u>(1-hour average)</u>	<u>tons (Annual)</u>												
NO _x	30	0.32												
CO	50	0.32												
7.	<p>Emissions from the Marshall Community Center Aerco Boiler 2 must not exceed:</p> <table border="0" data-bbox="203 724 876 913"> <thead> <tr> <th></th> <th style="text-align: center;">Emission Limit ppmvd @ 3% O₂</th> <th style="text-align: center;">Emission Limit</th> </tr> <tr> <th><u>Pollutant</u></th> <th><u>(1-hour average)</u></th> <th><u>tons (Annual)</u></th> </tr> </thead> <tbody> <tr> <td>NO_x</td> <td style="text-align: center;">30</td> <td style="text-align: center;">0.32</td> </tr> <tr> <td>CO</td> <td style="text-align: center;">50</td> <td style="text-align: center;">0.32</td> </tr> </tbody> </table> <p>Annual emissions must be calculated using the emission factors presented in the Technical Support Document for this Air Discharge Permit unless more recent source test data has been collected.</p>		Emission Limit ppmvd @ 3% O ₂	Emission Limit	<u>Pollutant</u>	<u>(1-hour average)</u>	<u>tons (Annual)</u>	NO _x	30	0.32	CO	50	0.32	7
	Emission Limit ppmvd @ 3% O ₂	Emission Limit												
<u>Pollutant</u>	<u>(1-hour average)</u>	<u>tons (Annual)</u>												
NO _x	30	0.32												
CO	50	0.32												
8.	<p>Emissions from the Fire Station 5 HydrothermBoiler must not exceed:</p> <table border="0" data-bbox="203 1144 876 1333"> <thead> <tr> <th></th> <th style="text-align: center;">Emission Limit ppmvd @ 3% O₂</th> <th style="text-align: center;">Emission Limit</th> </tr> <tr> <th><u>Pollutant</u></th> <th><u>(1-hour average)</u></th> <th><u>tons (Annual)</u></th> </tr> </thead> <tbody> <tr> <td>NO_x</td> <td style="text-align: center;">30</td> <td style="text-align: center;">0.10</td> </tr> <tr> <td>CO</td> <td style="text-align: center;">50</td> <td style="text-align: center;">0.10</td> </tr> </tbody> </table> <p>Annual emissions must be calculated using the emission factors presented in the Technical Support Document for this Air Discharge Permit unless more recent source test data has been collected.</p>		Emission Limit ppmvd @ 3% O ₂	Emission Limit	<u>Pollutant</u>	<u>(1-hour average)</u>	<u>tons (Annual)</u>	NO _x	30	0.10	CO	50	0.10	16
	Emission Limit ppmvd @ 3% O ₂	Emission Limit												
<u>Pollutant</u>	<u>(1-hour average)</u>	<u>tons (Annual)</u>												
NO _x	30	0.10												
CO	50	0.10												
9.	<p>Emissions from Hot Water Heaters must meet the following specifications:</p> <ol style="list-style-type: none"> (1) On or after January 1, 2010, no person shall offer for sale, or install, a water heater that emits NO_x at levels in excess of 55 ppmv at 3% O₂, dry (0.067 lb per million Btu of heat input). (2) On or after January 1, 2013, no person shall offer for sale, or install, a water heater that emits NO_x at levels in excess of 20 ppmv at 3% O₂, dry (0.024 lb per million Btu of heat input). <p>Annual emissions must be calculated using the above emission guarantee. Factors are presented in Section 6 of the Technical Support Document for this Air Discharge Permit. Any replacement units not subject to permitting must also meet the specifications of SWCAA 400-070 (13).</p>	1, 7, 9, 16												

Req.	Emission Limits	Equipment/ Activity ID												
10.	Emissions from the Luepke Senior Center Carrier Furnace 1 must not exceed: <table border="0"> <thead> <tr> <th></th> <th>Emission Limit</th> <th>Emission Limit</th> </tr> <tr> <th><u>Pollutant</u></th> <th><u>lb/hr (1-hr average)</u></th> <th><u>tons (Annual)</u></th> </tr> </thead> <tbody> <tr> <td>NO_x</td> <td>0.012</td> <td>0.05</td> </tr> <tr> <td>CO</td> <td>0.005</td> <td>0.02</td> </tr> </tbody> </table> <p>Annual emissions must be calculated using the emission factors presented in the Technical Support Document for this Air Discharge Permit unless more recent source test data has been collected.</p>		Emission Limit	Emission Limit	<u>Pollutant</u>	<u>lb/hr (1-hr average)</u>	<u>tons (Annual)</u>	NO _x	0.012	0.05	CO	0.005	0.02	9
	Emission Limit	Emission Limit												
<u>Pollutant</u>	<u>lb/hr (1-hr average)</u>	<u>tons (Annual)</u>												
NO _x	0.012	0.05												
CO	0.005	0.02												
11.	Emissions from the Luepke Senior Center Carrier Furnace 2 must not exceed: <table border="0"> <thead> <tr> <th></th> <th>Emission Limit</th> <th>Emission Limit</th> </tr> <tr> <th><u>Pollutant</u></th> <th><u>lb/hr (1-hr average)</u></th> <th><u>tons (Annual)</u></th> </tr> </thead> <tbody> <tr> <td>NO_x</td> <td>0.006</td> <td>0.03</td> </tr> <tr> <td>CO</td> <td>0.003</td> <td>0.01</td> </tr> </tbody> </table> <p>Annual emissions must be calculated using the emission factors presented in the Technical Support Document for this Air Discharge Permit unless more recent source test data has been collected.</p>		Emission Limit	Emission Limit	<u>Pollutant</u>	<u>lb/hr (1-hr average)</u>	<u>tons (Annual)</u>	NO _x	0.006	0.03	CO	0.003	0.01	9
	Emission Limit	Emission Limit												
<u>Pollutant</u>	<u>lb/hr (1-hr average)</u>	<u>tons (Annual)</u>												
NO _x	0.006	0.03												
CO	0.003	0.01												
12.	Visible emissions from the natural gas-fired equipment 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, 4, 7, 9, 16												
13.	Visible emissions from the propane-fired emergency generator engine 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).	19												
14.	Visible emissions from the diesel-fired emergency generator engines must not exceed five 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) except during startup. For the purposes of this requirement, the startup period ends when the earlier of the following operating events occurs: (a) The engine has reached normal operating temperature; or (b) The engine has been operating for 15 minutes.	2, 3, 5, 6, 8, 10-15, 17, 18, 20-25												

Operating Limits and Requirements

Req.	Operating Limits and Requirements	Equipment/ Activity ID
15.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
16.	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.	Facility-wide

Req.	Operating Limits and Requirements	Equipment/ Activity ID
17.	Emission units and activities identified in this ADP must be maintained and operated in total and continuous conformity with the conditions specified in this ADP. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this ADP, including directing the facility to cease operations until corrective action can be completed.	Facility-wide
18.	If the test results from any emission monitoring event for the boilers (City Hall, Firstenburg Community Center, Marshall Community Center, Fire Station 5) indicates that emission concentrations may exceed 30 ppmvd NO _x @ 3% O ₂ or 50 ppmvd CO @ 3% O ₂ , 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 boiler 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 30 ppmvd NO _x @ 3% O ₂ or 50 ppmvd CO @ 3% O ₂ .	1, 4, 7, 16
19.	Boilers and hot water heaters must only be fired on natural gas while operating under normal conditions.	1, 4, 7, 9, 16
20.	The diesel-fired emergency generator engines must only be fired on #2 diesel or better. The sulfur content of the diesel fuel fired in the diesel-fired emergency generator engines must not exceed 0.0015% by weight. A diesel fuel certification from the fuel supplier may be used to demonstrate compliance with this requirement.	2, 3, 5, 6, 8, 10-15, 17, 18, 20-25
21.	The Fire Station 3 propane-fired emergency generator engine must only be fired on propane.	19
22.	Operation of the diesel- and propane-fired emergency generator engines for maintenance checks and readiness testing must not exceed 100 hours per year. Emergency operation of each emergency generator engine is not limited. A nonresettable time totalizer must be installed and used to measure the number of hours each engine operates.	2, 3, 5, 6, 8, 10-15, 17-25
23.	Operation of the diesel- and propane-fired emergency generator engines must be limited to maintenance checks, readiness testing, and as necessary to provide emergency power.	2, 3, 5, 6, 8, 10-15, 17-25
24.	Exhaust from the diesel- and propane-fired emergency generator engines must be discharged vertically above the roof level of the building or enclosure in which the engine is housed (if applicable). Any device that obstructs or prevents vertical discharge is prohibited.	2, 3, 5, 6, 8, 10-15, 17-25

Monitoring and Recordkeeping Requirements

Req.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID
25.	With the exception of data logged by a computerized data acquisition system, each record required by this Air Discharge Permit must include the date and the name of the person making the record entry.	Facility-wide
26.	All records required by this Air Discharge Permit must be readily available on-site for a minimum period of no less than three (3) years and must be available for inspection by SWCAA representatives	Facility-wide
27.	Excess emissions and upset conditions must be recorded for each occurrence.	Facility-wide
28.	<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 amount of natural gas consumed per facility must be recorded for each calendar year. Billing records may serve this purpose; (b) The fuel sulfur content of the diesel burned by the diesel-fired emergency generator engines and fire pump engines must be determined and recorded for each fuel delivery. A fuel supplier certification may be used in lieu of actual fuel testing; (c) The total number of hours each emergency generator engine and fire pump is operated must be recorded for each calendar year; (d) Maintenance activities that may affect emissions must be logged for each occurrence; (e) Excess emissions, and upset conditions that cause excess emissions, must be recorded for each occurrence; and (f) All air quality related complaints, including odor complaints, received by the permittee and the results of any subsequent investigation or corrective action must be recorded for each occurrence. 	Facility-wide

Emission Monitoring and Testing Requirements

Req.	Emission Monitoring and Testing Requirements	Equipment/ Activity ID
29.	Emission monitoring of the boilers (City Hall, Firstenberg Community Center, Marshall Community Center, Fire Station 5) must be conducted at least annually as described in Appendix A of this Permit.	1, 4, 7, 16

Reporting Requirements

Req.	Reporting Requirements	Equipment/ Activity ID
30.	Upset conditions must be reported to SWCAA within five business days after discovery. The permittee may provide notification to SWCAA via telephone. A message may be left on the answering machine for upset conditions that occur outside of normal business hours.	Facility-wide
31.	Excess emissions must be reported to SWCAA as follows: (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(1); and (c) No later than 30 days after the end of the month of discovery for all other excess emissions.	Facility-wide
32.	Deviations from permit conditions must be reported no later than 30 days after the end of the month during which the deviation is discovered.	Facility-wide
33.	The results of all emission monitoring conducted in accordance with Appendix A must be reported to SWCAA within 15 days of test completion.	1, 4, 7, 16
34.	The following emissions related records must be reported to SWCAA by March 15 th for the previous calendar year: (a) The total amount of natural gas consumed per facility; (b) The total number of hours each emergency generator engine or fire pump engine was operated; and (c) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs).	Facility-wide

3. General Provisions

Req.	General Provisions
A.	For the purpose of ensuring compliance with this ADP, 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 ADP and applicable regulations and to perform or require such tests as may be deemed necessary.
B.	The provisions, terms, and conditions of this ADP bind the Permittee, its officers, directors, agents, servants, employees, successors and assigns, and all persons, firms, and corporations acting under or for the Permittee.
C.	The requirements of this ADP survive any transfer of ownership of the source or any portion thereof.
D.	This ADP must be posted conspicuously at or be readily available near the source.

Req.	General Provisions
E.	Approval and associated ADP requirements for any new or modified equipment will be invalid if installation or modification of the affected equipment has not commenced within eighteen (18) months from date of issuance, is discontinued for a period of eighteen (18) months or more, or is not completed within a reasonable time.
F.	This ADP does not supersede requirements of other Agencies with jurisdiction and further, this ADP does not relieve the Permittee of any requirements of any other governmental Agency. In addition to this ADP, the Permittee may be required to obtain permits or approvals from other agencies with jurisdiction.
G.	Compliance with the terms of this ADP 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.
H.	If any provision of this ADP is held to be invalid, all unaffected provisions of the ADP will remain in effect and be enforceable.
I.	No change in this ADP will 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.
J.	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 ADP, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act.

Emission Monitoring Requirements

City Hall, Firstenburg Community Center, Marshall Community Center, Fire Station 5 Boilers

1. Introduction:

- a. The purpose of periodically monitoring the exhaust of the City Hall, Firstenburg Community Center, Marshall Community Center, Fire Station 5 boilers is to minimize emissions and provide a reasonable assurance that the units are 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. Emission monitoring to determine emission concentrations of the following constituents must be conducted for the City Hall, Firstenburg Community Center, Marshall Community Center, Fire Station 5 boilers no later than the end of November during each calendar year unless an alternative monitoring schedule has been approved by SWCAA. Emission monitoring conducted more than three months before the required due date will not satisfy the periodic emission monitoring requirement without prior approval from SWCAA.

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.

Emission Monitoring Requirements

**City Hall, Firstenburg Community Center, Marshall Community Center, Fire Station 5
Boilers**

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

- 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.

If the test results from any emission 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.

NO _x (ppmvd @ 3% O ₂)	CO (ppmvd @ 3% O ₂)
30	50

Emission Monitoring Requirements

City Hall, Firstenburg Community Center, Marshall Community Center, Fire Station 5 Boilers

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, calibration gas certificates, 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 Monitoring Requirements

The monitoring 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 the monitoring schedule. Upon review of the request and in accordance with EPA delegation, SWCAA will inform the Permittee in writing of any approved modifications

State Environmental Policy Act

DETERMINATION OF SEPA EXEMPT - SWCAA 20-041

Description of proposal:

City of Vancouver – Facilities Management submitted Air Discharge Permit (ADP) Application CL-3059 to the Southwest Clean Air Agency to approve several existing hot water heaters, boilers, and emergency generator engines at various locations under management of the City of Vancouver. This project is exempt from SEPA requirements pursuant to WAC 197-11-800(3) since it only involves repair, remodeling, maintenance, or minor alteration of existing structures, equipment or facilities, and does not involve material expansions or changes in use. Also, the existing equipment permitted under this ADP are all located at existing facilities owned and/or operated by the City of Vancouver; therefore, SEPA has been initially performed by the City of Vancouver as the lead agency as appropriate for the individual facility.

Proponent: Justin Serface – Facilities Supervisor

Location of proposal, including street address if any: Multiple

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 facility 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

