

March 4, 2021

Mr. Frank Dick
City of Vancouver – Public Works
PO Box 1995
Vancouver, WA 98668

Subject: Final Approval for Existing Public Works Sewer Emergency Engines

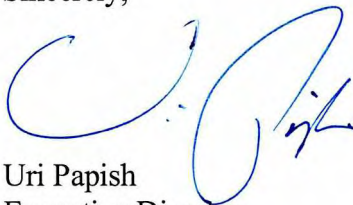
Dear Mr. Dick:

A final determination to issue Air Discharge Permit 21-3456 has been completed for Air Discharge Permit application CL-3108 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-3108 was published on SWCAA's internet website on December 16, 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 21-3456 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 21-3456 and Technical Support Document



SOUTHWEST CLEAN AIR AGENCY

**AIR DISCHARGE PERMIT
SWCAA 21-3456**

Issued: March 4, 2021

Facility Name: City of Vancouver – Public Works
Physical Location: 4500 SE Columbia Way
Vancouver, WA 98668

SWCAA ID: 2679

REVIEWED BY:


Paul T. Mairose, Chief Engineer



APPROVED BY:

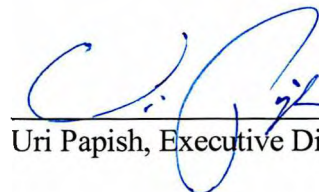

Uri Papish, Executive Director

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1. Equipment/Activity Identification

ID No.	Equipment/Activity	Control Equipment / Measure
1	BBC – Emergency Generator Engine (Detroit Diesel 643 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
2	Orchards – Emergency Generator Engine (Caterpillar 587 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
3	Andresen – Emergency Generator Engine (Caterpillar 1,518 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
4	Centennial – Emergency Generator Engine (John Deere 80 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
5	Columbia Palisades – Emergency Generator Engine (Cummins 149 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
6	Columbia Tech – Emergency Generator Engine (John Deere 200 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
7	Fishers Grove – Emergency Generator Engine (Cummins 118 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
8	Grand Central – Emergency Generator Engine (Cummins 69 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
9	Lacamas – Emergency Generator Engine (Cummins 279 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
10	Maple Crest – Emergency Generator Engine (Cummins 81 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
11	Pinebrook – Emergency Generator Engine (Cummins 99 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
12	Rosewood – Emergency Generator Engine (Cummins 132 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
13	Stein Estates – Emergency Generator Engine (Cummins 81 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
14	Waterfront – Emergency Generator Engine (Cummins 125 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation
15	West Ridge – Emergency Generator Engine (John Deere 120 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation

2. Permit Terms and Conditions

The following tables detail the specific requirements of this Air Discharge Permit (ADP). In addition to the requirements listed below, equipment at this facility may be subject to other federal, state, and local regulations. The requirement number is identified in the left-hand column. The text of the ADP requirement is contained in the middle column. The emission unit, equipment, or activity to which the permit requirement applies is listed in the right-hand column.

Emission Limits

Req.	Emission Limits	Equipment/ Activity ID
1.	Visible emissions from the diesel-fired emergency generator engines must not exceed ten 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.	1 – 15

Operating Limits and Requirements

Req.	Operating Limits and Requirements	Equipment/ Activity ID
2.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
3.	Odors from the facilities must not unreasonably interfere with any other property owner's use and enjoyment of the property. Recognized good practice and procedures must be used to reduce odors to a reasonable minimum.	Facility-wide
4.	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
5.	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.	1 – 15
6.	Operation of the diesel-fired emergency generator engines for maintenance checks and readiness testing must not exceed 100 hours per year. Emergency operation of the emergency generator engine is not limited. A non-resettable time totalizer must be installed and used to measure the number of hours the engine operates.	1 – 15
7.	Operation of the diesel-fired emergency generator engines must be limited to maintenance checks, readiness testing, and as necessary to provide emergency power.	1 – 15
8.	Exhaust from the diesel-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.	1 – 15

Monitoring and Recordkeeping Requirements

Req.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID
9.	With the exception of data logged by a computerized data acquisition system, each record required by this ADP must include the date and the name of the person making the record entry.	Facility-wide
10.	All records required by this ADP 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
11.	Excess emissions and upset conditions must be recorded for each occurrence.	Facility-wide
12.	The following information must be collected, recorded at the intervals specified below, and readily available on-site for inspection: <ul style="list-style-type: none"> (a) The fuel sulfur content of the diesel burned by the diesel-fired emergency generator engines must be determined and recorded for each fuel delivery. A fuel supplier certification may be used in lieu of actual fuel testing; (b) The total number of hours each emergency generator engine is operated must be recorded for each calendar year; (c) Maintenance activities that may affect emissions must be logged for each occurrence; (d) Excess emissions and upset conditions that cause excess emissions must be recorded for each occurrence; and (e) 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

None

Reporting Requirements

Req.	Reporting Requirements	Equipment/ Activity ID
13.	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
14.	Excess emissions must be reported to SWCAA as follows: <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(1); and (c) No later than 30 days after the end of the month of discovery for all other excess emissions. 	Facility-wide

Req.	Reporting Requirements	Equipment/ Activity ID
15	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
16.	<p>The following emissions-related records must be reported to SWCAA by March 15th for the previous calendar year:</p> <ul style="list-style-type: none"> (a) The total number of hours each emergency generator engine was operated; and (b) 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.	
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.	

State Environmental Policy Act

DETERMINATION OF SEPA EXEMPT - SWCAA 21-006

Description of proposal:

City of Vancouver – Public Works submitted Air Discharge Permit (ADP) Application CL-3108 to the Southwest Clean Air Agency to approve several existing emergency engines at various locations under management of the City of Vancouver. SEPA was completed at the time of the original land development and pump station installation by individual parties at these locations throughout Vancouver. Individual SEPA determinations are not listed here. SWCAA considers the equipment exempt from SEPA under this permitting action.

Proponent: Frank Dick – Wastewater Engineering 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: 3/4/2021

