



SWCAA
Southwest Clean Air Agency

TECHNICAL SUPPORT DOCUMENT

**Air Discharge Permit ADP 21-3478
ADP Application CL-3169**

Issued: August 11, 2021

**Vancouver Clinic Lab
SWCAA ID - 2731**

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Abbreviations

ADP	Air Discharge Permit
AP-42	<u>Compilation of Emission Factors, AP-42, Fifth Edition, Volume 1, Stationary Point and Area Sources</u> – published by the US Environmental Protection Agency
BACT	Best available control technology
Btu	British thermal unit
CAS #	Chemical Abstracts Service registry number
cfm	Cubic feet per minute
CPM	Condensable particulate matter
CFR	Code of Federal Regulations
CO	Carbon monoxide
CO ₂	Carbon dioxide
CO ₂ e	Carbon dioxide equivalent as defined in 40 CFR 98
EPA	U.S. Environmental Protection Agency
g/hp-hr	Grams per horsepower hour
gr/dscf	Grains per dry standard cubic foot (68 °F, 1 atmosphere)
HAP	Hazardous air pollutant listed pursuant to Section 112 of the Federal Clean Air Act
lb/hp-hr	Pounds per horsepower hour
lb/hr	Pounds per hour
lb/MMBtu	Pounds per million British thermal units
lb/ton	Pounds per ton
lb/yr	Pounds per year
MMBtu/hr	Millions of British thermal units per hour
MSDS	Material Safety Data Sheet
NO _x	Nitrogen oxides
NOV	Notice of Violation
oz/yd ²	Once per square yard
PM	Total particulate matter (includes both filterable and condensable particulate matter as measured by EPA Methods 5 and 202)
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to 10 micrometers (includes both filterable and condensable particulate matter as measured by EPA Methods 5 and 202)
PM _{2.5}	Particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers (includes both filterable and condensable particulate matter as measured by EPA Methods 5 and 202)
ppm	Parts per million
ppmv	Parts per million by volume
ppmvd	Parts per million by volume, dry
PSD	Prevention of Significant Deterioration
psig	Pounds per square inch, gauge
RACT	Reasonably Available Control Technology
RCW	Revised Code of Washington
SQER	Small Quantity Emission Rate listed in WAC 173-460
SO ₂	Sulfur dioxide
SWCAA	Southwest Clean Air Agency
TAP	Toxic air pollutant pursuant to Chapter 173-460 WAC
T-BACT	Best Available Control Technology for toxic air pollutants
tpy	Tons per year
TWA	Time weighted average
VOC	Volatile organic compound
WAC	Washington Administrative Code

1. FACILITY IDENTIFICATION

Applicant Name: Vancouver Clinic
Applicant Address: 700 NE 87th Avenue, Vancouver, WA 98664

Facility Name: Vancouver Clinic Lab
Facility Address: 12019 NE 99th Street, Vancouver, WA 98682

Contact person: Jon Wilson, Administrator Clinical/Pathology Lab
SWCAA Identification: 2731

Primary Process: Medical Laboratories
SIC/NAICS Code: 8071 / 621511
Facility Classification: Minor

2. FACILITY DESCRIPTION

Vancouver Clinic operates eleven multi-specialty medical clinics in Clark County. The proposed facility is a new clinical/pathology laboratory that will support existing clinic operations.

3. CURRENT PERMITTING ACTION

This permitting action is in response to Air Discharge Permit application number CL-3169 (ADP Application CL-3169) dated June 30, 2021. Vancouver Clinic submitted ADP Application CL-3169 requesting approval of the following:

- Installation of two new space heating boilers (LAARS NTH 1200);
- Installation of a new water heater (Hamilton HWDG 199-119 CWIS); and
- Installation of a new diesel fired emergency generator (Kohler 150REOZJF).

4. PROCESS DESCRIPTION

- 4.a Space Heating (new). Two package boilers will be used to provide hot water to a hydronic system for the purposes of space heating. The boilers will typically operate less than one half of the year. ADP Application CL-3169 specifies average operation as approximately 4380 hours per year.
- 4.b Domestic Hot Water (new). One natural gas fired hot water heater will be used to provide domestic hot water at the facility.
- 4.c Emergency Power Generation (new). One diesel fired emergency generator will be used to generate emergency electrical power at the facility.

5. EQUIPMENT/ACTIVITY IDENTIFICATION

- 5.a Space Heating Boiler 1 (new). This unit operates in support of a hydronic space heating system at the facility. Boiler 1 is described as follows:

Make / Model: LAARS / NeoTherm LC NTH 1200
Rated Heat Input: 1.2 MMBtu/hr
Fuel: Natural gas
Installed: 2021
Exhaust: 6 in dia vertical stack at ~10 ft above ground level.

- 5.b Space Heating Boiler 2 (new). This unit operates in support of a hydronic space heating system at the facility. Boiler 2 is described as follows:

Make / Model: LAARS / NeoTherm LC NTH 1200
Rated Heat Input: 1.2 MMBtu/hr
Fuel: Natural gas
Installed: 2021
Exhaust: 6 in dia vertical stack at ~10 ft above ground level.

- 5.c Emergency Engine (new). This unit provides power to an emergency generator at the facility. Equipment details are listed below.

Make / Model: John Deere / 6068HF285K
Power Rating: 237 bhp
Fuel Type: Diesel
Fuel Consumption: 11.7 gal/hr
Model Year: 2020
EPA Certification: Tier 3
NSPS/MACT Applicable: IIII / ZZZZ
Exhaust: 3.86 in dia vertical stack at ~9 ft above ground level
Generator Make / Model: Kohler / 150REOZJF
Generator Power Rating: 150 ekW

- 5.d Insignificant Emission Units. The following pieces of facility equipment have been determined to have insignificant emissions, and are not registered as emission units:

Hot Water Heater (new). This unit provides domestic hot water to the facility. This unit complies with SCAQMD Rule 1146.2 for low NOx requirements for the year manufactured. Equipment details are listed below.

Make / Model: Hamilton EVO / HWDG 199-119 CWIS
Heat Input Rating: 0.2 MMBtu/hr
Fuel: Natural gas
Installed: 2021

Fume Hood Exhausts (new). The facility operates three small fume hoods. Each hood has a dedicated exhaust vent. The exhaust rate of the hoods is 515 acfm, 340 acfm, and 340 acfm, respectively. Small quantities of xylene, ethanol, and isopropyl are used in support of laboratory operations.

- 5.e Equipment/Activity Summary.

ID No.	Generating Equipment/Activity	# of Units	Control Measure/Equipment	# of Units
1	Space Heating Boiler 1 (LAARS – 1.2 MMBtu/hr)	1	Low Emission Burner, Low Sulfur Fuel (Nat Gas)	N/A
2	Space Heating Boiler 2 (LAARS – 1.2 MMBtu/hr)	1	Low Emission Burner, Low Sulfur Fuel (Nat Gas)	N/A
3	Emergency Engine (John Deere – 237 bhp)	1	EPA Tier Certified Ultra-low sulfur diesel ($\leq 0.0015\%$ by wt)	N/A

6. EMISSIONS DETERMINATION

Emissions to the ambient atmosphere from the equipment proposed in ADP Application CL-3169 consist of nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), particulate matter (PM) sulfur dioxide (SO₂), toxic air pollutants (TAPs), and hazardous air pollutants (HAPs).

- 6.a Space Heating Boiler 1 (new). Potential emissions from boiler operation are calculated from a rated heat input of 1.2 MMBtu/hr, 8,760 hr/yr, and applicable emission factors. Emission factors for NO_x and CO correspond to 30 ppmv and 50 ppmv at 3% O₂, respectively. All other emission factors are taken from EPA AP-42 §1.4 "Natural Gas Combustion" (3/98). All PM is assumed to be PM_{2.5}.

Annual emissions will be calculated based on actual fuel consumption using the same methodology.

Heat Input Rating =	1.200	MMBtu/hr		
Gas Heat Content =	1,020	Btu/scf		
Fuel Consumption =	10,512	MMBtu/yr		
	Emission Factor		Emissions	
Pollutant	(lb/MMBtu)	(lb/hr)	(lb/yr)	(tpy)
NO _x	0.0364	0.044	383	0.19
CO	0.0369	0.044	388	0.19
VOC	0.0054	0.006	57	0.03
SO _x as SO ₂	0.0006	0.0007	6	0.003
PM (total)	0.0075	0.0089	78	0.04
PM ₁₀	0.0075	0.0089	78	0.04
PM _{2.5}	0.0075	0.0089	78	0.04
Benzene	2.06E-06	2.5E-06	2.2E-02	1.1E-05
Formaldehyde	7.35E-05	8.8E-05	7.7E-01	3.9E-04
CO ₂ e	117.1	140.5	1,230,955	615.5

- 6.b Space Heating Boiler 2 (new). Potential emissions from boiler operation are calculated from a rated heat input of 1.2 MMBtu/hr, 8,760 hr/yr, and applicable emission factors. Emission factors for NO_x and CO correspond to 30 ppmv and 50 ppmv at 3% O₂, respectively. All other emission factors are taken from EPA AP-42 §1.4 "Natural Gas Combustion" (3/98). All PM is assumed to be PM_{2.5}.

Annual emissions will be calculated based on actual fuel consumption using the same methodology.

Heat Input Rating =	1.200	MMBtu/hr		
Gas Heat Content =	1,020	Btu/scf		
Fuel Consumption =	10,512	MMBtu/yr		
	Emission Factor		Emissions	
Pollutant	(lb/MMBtu)	(lb/hr)	(lb/yr)	(tpy)
NO _x	0.0364	0.044	383	0.19
CO	0.0369	0.044	388	0.19
VOC	0.0054	0.006	57	0.03
SO _x as SO ₂	0.0006	0.0007	6	0.003
PM (total)	0.0075	0.0089	78	0.04
PM ₁₀	0.0075	0.0089	78	0.04
PM _{2.5}	0.0075	0.0089	78	0.04
Benzene	2.06E-06	2.5E-06	2.2E-02	1.1E-05
Formaldehyde	7.35E-05	8.8E-05	7.7E-01	3.9E-04
CO ₂ e	117.1	140.5	1,230,955	615.5

- 6.c Hot Water Heater (new). Potential emissions from hot water heater operation are calculated from a rated heat input of 0.2 MMBtu/hr, 8,760 hr/yr, and applicable emission factors. The emission factor for NO_x corresponds to 20 ppmv at 3% O₂. All other emission factors are taken from EPA AP-42 §1.4 "Natural Gas Combustion" (3/98). All PM is assumed to be PM_{2.5}.

Annual emissions will be calculated based on actual fuel consumption using the same methodology.

Heat Input Rating =	0.200	MMBtu/hr		
Gas Heat Content =	1,020	Btu/scf		
Fuel Consumption =	1,752	MMBtu/yr		
	Emission Factor		Emissions	
Pollutant	(lb/MMBtu)	(lb/hr)	(lb/yr)	(tpy)
NO _x	0.0243	0.005	43	0.02
CO	0.0824	0.016	144	0.07
VOC	0.0054	0.001	9	0.00
SO _x as SO ₂	0.0006	0.0001	1	0.001
PM (total)	0.0075	0.0015	13	0.01
PM ₁₀	0.0075	0.0015	13	0.01
PM _{2.5}	0.0075	0.0015	13	0.01
Benzene	2.06E-06	4.1E-07	3.6E-03	1.8E-06
Formaldehyde	7.35E-05	1.5E-05	1.3E-01	6.4E-05
CO ₂ e	117.1	23.4	205,158	102.6

- 6.d Emergency Generator Diesel Engine – John Deere (new). Potential emissions from engine operation are calculated based on 200 hours of operation, use of ultra-low sulfur diesel (<0.0015% sulfur by weight), and a maximum engine rating of 237 bhp.

Annual emissions will be calculated from actual hours of operation using the emission factors identified below.

Hours of Operation =	200	hours
Power Output =	237	horsepower
Fuel Sulfur Content =	0.0015	% by weight
Fuel Consumption Rate =	11.70	gal/hr
Fuel Heat Content =	0.138	MMBtu/gal (40 CFR 98)

<u>Pollutant</u>	<u>EF</u>	<u>Emissions</u>	
	<u>lb/hr</u>	<u>tpy</u>	<u>EF Source</u>
NO _x	1.47	0.15	EPA Certification
CO	0.47	0.05	EPA Certification
VOC	0.047	0.005	EPA Certification
SO _x as SO ₂	0.003	0.0003	Mass Balance
PM/PM ₁₀	0.047	0.005	EPA Certification
PM _{2.5}	0.047	0.005	EPA Certification

<u>Greenhouse Gases</u>	<u>kg/MMBtu</u>	<u>GWP</u>	<u>CO₂e</u>		<u>CO₂e</u>	
			<u>lb/MMBtu</u>	<u>lb/gallon</u>	<u>tpy, CO₂e</u>	
CO ₂	73.96	1	163.054	22.501	26.327	40 CFR 98
CH ₄	0.003	25	0.165	0.023	0.027	40 CFR 98
N ₂ O	0.0006	298	0.394	0.054	0.064	40 CFR 98
Total GHG - CO ₂ e			163.613	22.579	26.417	

- 6.e Emissions Summary/Facility-wide Potential to Emit. Facility-wide potential to emit as calculated in the sections above is summarized below.

<u>Pollutant</u>	<u>Potential Emissions (tpy)</u>	<u>Project Increase (tpy)</u>
NO _x	0.55	0.55
CO	0.51	0.51
VOC	0.07	0.07
SO ₂	0.007	0.007
Lead	0.0	0.0
PM	0.09	0.09
PM ₁₀	0.09	0.09
PM _{2.5}	0.09	0.09
TAP	0.001	0.001
HAP	0.001	0.001
CO ₂ e	1,360	1,360

Pollutant	CAS Number	Category	Facility-wide Emissions (lb/yr)	Project Increase (lb/yr)	WAC 173-460 SQER (lb/yr)
Benzene	71-43-2	HAP/TAP A	0.05	0.05	20
Formaldehyde	50-00-0	HAP/TAP A	1.7	1.7	20

7. REGULATIONS AND EMISSION STANDARDS

Regulations that have been used to evaluate the acceptability of the proposed facility and establish emission limits and control requirements include, but are not limited to, the regulations, codes, or requirements listed below.

- 7.a 40 CFR 60 Subpart IIII "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines" applies to each compression ignition (CI) internal combustion engine (ICE) that commences construction after July 11, 2005 and is manufactured after April 1, 2006, or that is modified or reconstructed after July 11, 2005. This regulation is applicable to the emergency diesel engine at this facility.
- 7.b 40 CFR 63 Subpart ZZZZ "National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines" establishes national emission limitations and operating limitations for HAP emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This regulation is applicable to the emergency diesel engine at this facility. The unit complies with this regulation by complying with 40 CFR 60 Subpart IIII.
- 7.c Revised Code of Washington (RCW) 70A.15.2040 empowers any activated air pollution control authority to prepare and develop a comprehensive plan or plans for the prevention, abatement and control of air pollution within its jurisdiction. An air pollution control authority may issue such orders as may be necessary to effectuate the purposes of the Washington Clean Air Act and enforce the same by all appropriate administrative and judicial proceedings subject to the rights of appeal as provided in Chapter 62, Laws of 1970 ex. sess.
- 7.d RCW 70A.15.2210 provides for the inclusion of conditions of operation as are reasonably necessary to assure the maintenance of compliance with the applicable ordinances, resolutions, rules and regulations when issuing an Air Discharge Permit for installation and establishment of an air contaminant source.
- 7.e Washington Administrative Code (WAC) 173-460 "Controls for New Sources of Toxic Air Pollutants" requires Best Available Control Technology for toxic air pollutants (T-BACT), identification and quantification of emissions of toxic air pollutants and demonstration of protection of human health and safety. SWCAA implements WAC 173-460 as in effect on August 21, 1998.
- 7.f WAC 173-476 "Ambient Air Quality Standards" establishes ambient air quality standards for PM₁₀, PM_{2.5}, lead, sulfur dioxide, nitrogen dioxide, ozone, and carbon monoxide in the ambient air, which shall not be exceeded.
- 7.g SWCAA 400-040 "General Standards for Maximum Emissions" requires all new and existing sources and emission units to meet certain performance standards with respect to Reasonably Available Control Technology (RACT), visible emissions, fallout, fugitive emissions, odors, emissions detrimental to persons or property, sulfur dioxide, concealment and masking, and fugitive dust.
- 7.h SWCAA 400-050 "Emission Standards for Combustion and Incineration Units" requires that all provisions of SWCAA 400-040 be met and that no person shall cause or permit the emission of particulate matter from any combustion or incineration unit in excess of 0.23 grams per dry cubic meter (0.1 grains per dry standard cubic foot) of exhaust gas at standard conditions.
- 7.i SWCAA 400-060 "Emission Standards for General Process Units" prohibits particulate matter emissions from all new and existing process units in excess of 0.1 grains per dry standard cubic foot of exhaust gas.

- 7.j SWCAA 400-070(13) "General Requirements for Certain Source Categories: Natural Gas-Fired Water Heaters."
- (a) Applicability. The requirements of this section apply to all natural gas-fired water heaters with a rated heat input less than 400,000 Btu/hr. For the purposes of this subsection, the term "water heater" means a closed vessel in which water is heated by combustion of gaseous fuel and is withdrawn for use external to the vessel at pressures not exceeding 160 psig, including the apparatus by which heat is generated and all controls and devices necessary to prevent water temperatures from exceeding 210°F.
 - (b) Requirements.
 - (i) 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).
 - (ii) 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).
- 7.k SWCAA 400-109 "Air Discharge Permit Applications" requires that an Air Discharge Permit application be submitted for all new installations, modifications, changes, or alterations to process and emission control equipment consistent with the definition of "new source". Sources wishing to modify existing permit terms may submit an Air Discharge Permit application to request such changes. An Air Discharge Permit must be issued, or written confirmation of exempt status must be received, before beginning any actual construction, or implementing any other modification, change, or alteration of existing equipment, processes, or permits.
- 7.l SWCAA 400-110 "New Source Review" requires that SWCAA issue an Air Discharge Permit in response to an Air Discharge Permit application prior to establishment of the new source, emission unit, or modification.
- 7.m SWCAA 400-111 "Requirements for Sources in a Maintenance Plan Area" requires that no approval to construct or alter an air contaminant source shall be granted unless it is evidenced that:
- (1) The equipment or technology is designed and will be installed to operate without causing a violation of the applicable emission standards;
 - (2) Emissions will be minimized to the extent that the new source will not exceed emission levels or other requirements provided in the maintenance plan;
 - (3) Best Available Control Technology will be employed for all air contaminants to be emitted by the proposed equipment;
 - (4) The proposed equipment will not cause any ambient air quality standard to be exceeded; and
 - (5) If the proposed equipment or facility will emit any toxic air pollutant regulated under WAC 173-460, the proposed equipment and control measures will meet all the requirements of that Chapter.

8. RACT/BACT/BART/LAER/PSD/CAM DETERMINATIONS

The proposed equipment and control systems incorporate Best Available Control Technology (BACT) for the types and amounts of air contaminants emitted by the processes as described below:

- 8.a BACT Determination – Hot Water Boilers. The proposed use of low sulfur fuel (natural gas), annual emission monitoring, and low emission burner technology (≤ 30 ppmv - NO_x, ≤ 50 ppmv CO) has been determined to meet the requirements of BACT for new hot water boilers at this facility.
- 8.b BACT Determination – Hot Water Heater. The proposed use of low sulfur fuel (natural gas), low emission burner technology, and proper combustion controls has been determined to meet the requirements of BACT for new hot water heaters at this facility.
- 8.c BACT Determination – Emergency Generator Diesel Engine. The proposed use of modern diesel engine design, limited hours of operation (testing, maintenance, and emergency use only), and ultra-low sulfur distillate fuel (less than 0.0015% sulfur by weight) has been determined to meet the requirements of BACT for the new emergency generator diesel engine at this facility.

Other Determinations

- 8.d Prevention of Significant Deterioration (PSD) Applicability Determination: The potential to emit of this facility is less than applicable PSD applicability thresholds. Likewise, this permitting action will not result in a potential increase in emissions equal to or greater than the PSD thresholds. Therefore, PSD review is not applicable to this action.
- 8.e Compliance Assurance Monitoring (CAM) Applicability Determination. CAM is not applicable to any emission unit at this facility because it is not a major source and is not required to obtain a Part 70 permit.

9. AMBIENT IMPACT ANALYSIS

- 9.a TAP Small Quantity Review. The incremental increases in TAP emissions associated with this permitting action are quantified in Section 6 of this Technical Support Document. All incremental increases in individual TAP emissions are less than the applicable small quantity emission rate (SQER) identified in WAC 173-460 (effective 8/21/98).

Conclusions

- 9.b Installation of the equipment proposed in ADP Application CL-3169 will not cause the ambient air quality requirements of Title 40 Code of Federal Regulations (CFR) Part 50 "National Primary and Secondary Ambient Air Quality Standards" to be violated.
- 9.c Installation of the equipment proposed in ADP Application CL-3169 will not cause the requirements of WAC 173-460 "Controls for New Sources of Toxic Air Pollutants" (as in effect 8/21/98) or WAC 173-476 "Ambient Air Quality Standards" to be violated.
- 9.d Installation of the equipment proposed in ADP Application CL-3169 will not cause a violation of emission standards for sources as established under SWCAA General Regulations Sections 400-040 "General Standards for Maximum Emissions," 400-050 "Emission Standards for Combustion and Incineration Units," and 400-060 "Emission Standards for General Process Units."

10. DISCUSSION OF APPROVAL CONDITIONS

SWCAA has made a determination to issue ADP 21-3478 in response to ADP Application CL-3169. ADP 21-3478 contains approval requirements deemed necessary to assure compliance with applicable regulations and emission standards as discussed below.

- 10.a General Basis. Permit requirements for equipment affected by this permitting action incorporate the operating schemes proposed by the applicant in ADP Application CL-3169. Permit requirements established by this action are intended to implement BACT, minimize emissions, and assure compliance with applicable requirements on a continuous basis. Emission limits for approved equipment are based on the maximum potential emissions calculated in Section 6 of this Technical Support Document.
- 10.b Monitoring and Recordkeeping Requirements. ADP 21-3478 establishes monitoring and recordkeeping requirements sufficient to document compliance with applicable emission limits, ensure proper operation of approved equipment and provide for compliance with generally applicable requirements. Specific monitoring requirements are established for fuel consumption and hours of operation.
- 10.c Reporting Requirements. ADP 21-3478 establishes general reporting requirements for annual air emissions, upset conditions and excess emissions. Specific reporting requirements are established for fuel consumption and hours of operation. Reports are to be submitted on an annual basis.

- 10.d Emergency Generator Diesel Engine. Permit requirements for the proposed emergency generator diesel engine are based on limited service (testing, maintenance, and emergency use only). Visible emission limits have been established consistent with proper operation and maintenance of the engine. Review of the emergency engine assumes the unit is fired on ultra-low sulfur diesel fuel ($\leq 0.0015\%$ by wt). Permit requirements allow the use of No. 2 diesel or better. In this case, "or better" includes road-grade diesel fuel with a lower sulfur content, biodiesel, and mixtures of biodiesel and road-grade diesel.

11. START-UP AND SHUTDOWN/ALTERNATIVE OPERATING SCENARIOS/POLLUTION PREVENTION

- 11.a Start-up and Shutdown Provisions. Pursuant to SWCAA 400-081 "Start-up and Shutdown", technology based emission standards and control technology determinations shall take into consideration the physical and operational ability of a source to comply with the applicable standards during start-up or shutdown. Where it is determined that a source is not capable of achieving continuous compliance with an emission standard during start-up or shutdown, SWCAA shall include appropriate emission limitations, operating parameters, or other criteria to regulate performance of the source during start-up or shutdown.

Emergency Generator Diesel Engine. Diesel engines may exhibit higher than normal opacity during startup. Accordingly, the visual emissions limit for the diesel engine power unit is not applicable during the startup period defined in the permit. General opacity standards continue to apply.

- 11.b Alternate Operating Scenarios. SWCAA conducted a review of alternate operating scenarios applicable to equipment affected by this permitting action. The permittee did not propose or identify any applicable alternate operating scenarios. Therefore, none were included in the permit requirements.
- 11.c Pollution Prevention Measures. SWCAA conducted a review of possible pollution prevention measures for the facility. No pollution prevention measures were identified by either the permittee or SWCAA separate or in addition to those measures required under BACT considerations. Therefore, none were included in the permit requirements.

12. EMISSION MONITORING AND TESTING

- 12.a Emission Monitoring – Space Heating Boilers. Emission monitoring of the Space Heating Boilers is required on a continuing 12-month cycle. All emission monitoring shall be conducted in accordance with ADP 21-3478, Appendix A.

13. FACILITY HISTORY

- 13.a Previous Permitting Actions. SWCAA has not previously issued any Permits for this facility.
- 13.b Compliance Status. A search of source records on file at SWCAA did not identify any outstanding compliance issues at this facility.

14. PUBLIC INVOLVEMENT OPPORTUNITY

- 14.a Public Notice for ADP Application CL-3169. Public notice for ADP Application CL-3169 was published on the SWCAA internet website for a minimum of (15) days beginning on July 13, 2021.

- 14.b Public/Applicant Comment for ADP Application CL-3169. SWCAA did not receive specific comments, a comment period request or any other inquiry from the public regarding this ADP application. Therefore, no public comment period was provided for this permitting action.
- 14.c State Environmental Policy Act. A complete SEPA checklist was submitted by Vancouver Clinic Lab in conjunction with ADP Application CL-3169. After reviewing the checklist, SWCAA has made a Determination of Nonsignificance (DNS 21-025) concurrent with issuance of ADP 21-3478.