



August 31, 2021

Mr. Ed Banaga  
NW Equity Holdings, LLC, dba Block 56 LLC  
1220 Main Street, Ste 500  
Vancouver, WA 98660

Subject: Final Approval for Existing Boiler and Emergency Generator Diesel Engine

Dear Mr. Banaga:

A final determination to issue Air Discharge Permit 21-3479 has been completed for Air Discharge Permit application CL-3156 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-3156 was published on SWCAA's internet website on March 30, 2021. 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 21-3479 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



**SOUTHWEST CLEAN AIR AGENCY**

**AIR DISCHARGE PERMIT  
SWCAA 21-3479**

**Issued: August 31, 2021**

Facility Name: Block 56 LLC  
Physical Location: 210 East 13<sup>th</sup> Street  
Vancouver, WA 98660

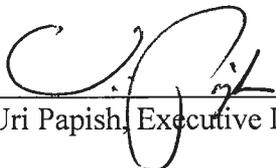
SWCAA ID: 2405

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	Weil McLain Boiler (0.937 MMBtu/hr)	Low Sulfur Fuel (natural gas)
2	Emergency Generator Diesel Engine (Cummins 538 bhp)	Ultra-Low Sulfur Diesel ( $\leq 0.0015\%$ S), Limited Operation

## 2. Permit Requirements

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.	<p>Emissions from the boiler must not exceed:</p> <table border="0"> <thead> <tr> <th></th> <th>Emission Limit ppmvd @ 3% O<sub>2</sub> (1-hour average)</th> <th>Emission Limit (tons per year)</th> </tr> </thead> <tbody> <tr> <td><u>Pollutant</u></td> <td></td> <td></td> </tr> <tr> <td>NO<sub>x</sub></td> <td>70</td> <td>0.35</td> </tr> <tr> <td>CO</td> <td>50</td> <td>0.15</td> </tr> </tbody> </table> <p>Emissions must be calculated consistent with the methodology and emission factors presented in Section 6 of the TSD for this ADP.</p>		Emission Limit ppmvd @ 3% O <sub>2</sub> (1-hour average)	Emission Limit (tons per year)	<u>Pollutant</u>			NO <sub>x</sub>	70	0.35	CO	50	0.15	1
	Emission Limit ppmvd @ 3% O <sub>2</sub> (1-hour average)	Emission Limit (tons per year)												
<u>Pollutant</u>														
NO <sub>x</sub>	70	0.35												
CO	50	0.15												
2.	Visible emissions from the boiler must not exceed zero percent (0%) opacity for more than three (3) minutes in any 1-hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).	1												
3.	<p>Visible emissions from the emergency generator diesel engine must not exceed the following for more than three (3) minutes in any 1-hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400):</p> <ul style="list-style-type: none"> <li>(a) Twenty percent (20%) during startup or shutdown; and</li> <li>(b) Ten percent (10%) at all other times.</li> </ul> <p>The startup period is defined as the first twenty (20) minutes of operation from a cold start, and shutdown is defined as when fuel flow to the engine has stopped.</p>	2												

**Operating Limits and Requirements**

<b>Req.</b>	<b>Operating Limits and Requirements</b>	<b>Equipment/ Activity ID</b>
4.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
5.	Odors from the facility 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
6.	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
7.	The boiler must only be fired on natural gas while under normal operating conditions.	1
8.	If the results from any emission monitoring event for the boiler indicates that emission concentrations may exceed 70 ppmvd NO <sub>x</sub> @ 3% O <sub>2</sub> or 50 ppmvd CO @ 3% O <sub>2</sub> , the permittee must either perform 60 minutes of additional monitoring to more accurately quantify CO and NO <sub>x</sub> 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 70 ppmvd NO <sub>x</sub> @ 3% O <sub>2</sub> or 50 ppmvd CO @ 3% O <sub>2</sub> .	1
9.	The emergency generator diesel engine must only be fired on No. 2 diesel or better. The sulfur content of the diesel fuel fired in the emergency generator diesel engine 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
10.	Operation of the emergency generator diesel engine for maintenance checks and readiness testing must not exceed 100 hours per year. Emergency operation of the emergency generator diesel engine is not limited. A nonresettable time totalizer must be installed and used to measure the number of hours the engine operates.	2
11.	Operation of the emergency generator diesel engine must be limited to maintenance checks, readiness testing, and as necessary to provide emergency power.	2
12.	Exhaust from the emergency generator diesel engine 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

**Monitoring and Recordkeeping Requirements**

Req.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID
13.	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
14.	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
15.	Excess emissions and upset conditions must be recorded for each occurrence.	Facility-wide
16.	<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"> <li>(a) The total amount of natural gas consumed must be recorded for each calendar year. Billing records may serve this purpose;</li> <li>(b) The fuel sulfur content of the diesel burned by the emergency generator diesel engine must be determined and recorded for each fuel delivery. A fuel supplier certification may be used in lieu of actual fuel testing;</li> <li>(c) The total number of hours the emergency generator diesel engine is operated must be recorded for each calendar year;</li> <li>(d) Maintenance activities that may affect emissions must be logged for each occurrence;</li> <li>(e) Excess emissions, and upset conditions that cause excess emissions, must be recorded for each occurrence; and</li> <li>(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.</li> </ul>	Facility-wide

**Emission Monitoring and Testing Requirements**

Req.	Emission Monitoring and Testing Requirements	Equipment/ Activity ID
17.	Emission monitoring of the boiler must be conducted at least annually, as described in Appendix A of this Permit.	1

**Reporting Requirements**

Req.	Reporting Requirements	Equipment/ Activity ID
18.	Upset conditions must be reported to SWCAA within five (5) 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
19.	Excess emissions must be reported to SWCAA as follows: (a) As soon as possible, but no later than twelve (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 forty-eight (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 thirty (30) calendar days after the end of the month of discovery for all other excess emissions.	Facility-wide
20.	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
21.	An annual emissions inventory report must be submitted to SWCAA by March 15 <sup>th</sup> for emissions from the previous calendar year in accordance with SWCAA 400-105(1). Each report must contain, at a minimum, the following information: (a) The total amount of natural gas consumed; (b) The total number of hours the emergency generator diesel engine operated; and (c) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs).	Facility-wide
22.	The results of all emission monitoring required by this ADP must be reported to SWCAA in writing within fifteen (15) calendar days of completion.	1

**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 70A.15, 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 70A.15 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.

**Appendix A**  
**Emission Monitoring Requirements**  
**Weil McLain Natural Gas Boiler**

**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. Emission monitoring to determine emission concentrations of the following constituents must be conducted for the boiler no later than the end of April 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<sub>x</sub>)

Oxygen (O<sub>2</sub>)

- b. Boiler 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<sub>x</sub> 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<sub>x</sub> cells/analyzer(s) and span the oxygen cell/analyzer.

**Appendix A**  
**Emission Monitoring Requirements**  
**Weil McLain Natural Gas Boiler**

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

- c. Sampling of the boiler 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 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<sub>x</sub> 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 <sub>x</sub> (ppmvd @ 3% O <sub>2</sub> )	CO (ppmvd @ 3% O <sub>2</sub> )
70	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<sub>x</sub>, CO, O<sub>2</sub>, 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, including calibration gas certificates.

**Appendix A**  
**Emission Monitoring Requirements**  
**Weil McLain Natural Gas Boiler**

Page 3 of 3

**4. Reporting (continued):**

- b. Individual data points must be reported as read. Final average monitoring results must be corrected to 3% O<sub>2</sub> 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 NONSIGNIFICANCE (DNS) – SWCAA 21-027**

**Description of proposal:**

ADP Application CL-3156: The proponent has applied for a permit to approve an existing natural gas-fired boiler and emergency generator diesel engine. The equipment will produce emissions of nitrogen oxides, carbon monoxide, sulfur dioxide, volatile organic compounds, and toxic air pollutants. At the emission levels proposed, this equipment will not have a significant adverse impact on ambient air quality. There are no physical changes proposed to existing equipment. This permitting action is not expected to have any effect on traffic, noise, glare, housing, or recreation opportunities.

**Proponent:**

Block 56 LLC - Old City Hall – (Ed Banaga)

**Location of proposal, including street address if any:**

210 East 13th Street  
Vancouver, WA 98660

**Lead agency:** Southwest Clean Air Agency

The lead agency for this proposal has determined that it does not have a probable significant impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.

- There is no comment period for this DNS.
- This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 15 days from the date below. Comments must be submitted by \_\_\_\_\_.

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

**Position/title:** Chief Engineer

**Address:** Southwest Clean Air Agency  
11815 NE 99<sup>th</sup> Street, STE 1294  
Vancouver, WA 98682-2454

**Phone:** (360) 574-3058 ext. 130

**Signature:** Paul T. Mairose

**Date:** 8/31/2021

