TECHNICAL SUPPORT DOCUMENT

Air Discharge Permit SWCAA 21-3479
Air Discharge Permit Application CL-3156

BLOCK 56 LLC - OLD CITY HALL
SWCAA ID: 2405

August 31, 2021

Prepared By: Vannessa McClelland
Air Quality Engineer
Southwest Clean Air Agency

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Abbreviations

ADP	Air Discharge Permit (a.k.a. Order of Approval)
AP-42	Compilation of Emission Factors, AP-42, Fifth Edition, Volume 1, Stationary Point and Area Sources – published by the US Environmental Protection Agency
ASIL	Acceptable Source Impact Level from WAC 173-460
BACT	Best Available Control Technology
BART	Best Available Retrofit Technology
CAM	Compliance Assurance Monitoring (40 CFR 64)
CFR	Code of Federal Regulations
CO	Carbon monoxide
EPA	U.S. Environmental Protection Agency
HAP	Hazardous Air Pollutant listed pursuant to Section 112 of the Federal Clean Air Act
LAER	Lowest Achievable Emission Rate
g/hp-hr	Grams per horsepower per hour
lb/hr	Pounds per hour
lb/MMscf	Pounds per million standard cubic feet
lb/yr	Pounds per year
MMBtu/hr	Millions of British thermal units per hour
NO_X	Nitrogen oxides
PM	Particulate matter with an aerodynamic diameter less than or equal to 100 micrometers (includes both filterable particulate matter measured by EPA Method 5 that is less than 100 micrometers and condensable particulate matter measured by EPA Method 202)
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to 10 micrometers (includes both filterable particulate matter measured by EPA Method 201 or 201A and condensable particulate matter measured by EPA Method 202)
$PM_{2.5}$	Particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers (includes both filterable particulate matter measured by EPA Method 201 or 201A and condensable particulate matter measured by EPA Method 202)
ppm	Parts per million
ppmvd @ X	Parts per million, dry volume basis correct to X
PSD	Prevention of Significant Deterioration
RACT	Reasonably Available Control Technology
RCW	Revised Code of Washington
SQER	Small Quantity Emission Rate listed in WAC 173-460
SO_2	Sulfur dioxide
SO_X	Sulfur oxides
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
VOC	Volatile Organic Compound
WAC	Washington Administrative Code

1. FACILITY IDENTIFICATION

Applicant Name: NW Equity Holdings, LLC, dba Block 56 LLC
Applicant Address: 1220 Main Street, Ste 500, Vancouver, WA 98660

Facility Name: Block 56 LLC (Old City Hall)
Facility Address: 210 East 13th Street, Vancouver, WA 98660
SWCAA Identification: 2405
Contact Person: Ed Banaga

Primary Process: Collection Agencies
SIC / NAICS: 7322/561440
Facility Classifications: BACT / Minor Source

2. FACILITY DESCRIPTION

Block 56 LLC (Block 56) operates a natural gas-fired boiler to heat the building and water and an emergency generator diesel engine for emergency use.

3. CURRENT PERMITTING ACTION

Block 56 submitted Air Discharge Permit application (ADP application) number CL-3156 on March 25, 2021, for approval of an existing natural gas-fired boiler and emergency generator diesel engine. The existing equipment includes:

1. One Weil McLain 78 boiler
2. One Cummins emergency generator diesel engine

4. PROCESS DESCRIPTION

The natural gas-fired boiler is used to heat the building and domestic water and the emergency generator diesel engine is used to power the building in the event of an electrical power interruption.

5. EQUIPMENT/ACTIVITY IDENTIFICATION

5.a Boiler. This boiler is used to provide building heat and to heat domestic water. Equipment details are provided below:

Make/Model:	Weil McLain 78 Boiler / 778
Serial Number:	CP4367047
Heat Input Rating:	0.937 MMBtu/hr
Burner Make / Model:	Gordon Piatt / R6.3-G-05
Burner Serial Number:	AP142921
Year Built:	2002
Fuel Type:	Natural gas
Stack Description:	~12" diameter, 10' above ground level

5.b Emergency Generator Diesel Engine. Equipment details are provided below:

Generator Make/Model:	Cummins / 350D34
Generator Serial Number:	38892
Generator Rating:	350 kW
Engine Make/Model:	Cummins / VT12-600 / 680FOC40EA
Engine Serial Number:	602309

Engine Rating:	538 bhp @ 1800 rpm (standby)
Year Built:	Unknown
Fuel Type:	Diesel (~28.0 gallons per hour at maximum load)
Certification:	uncertified

5.c Equipment/Activity Summary.

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

6. EMISSIONS DETERMINATION

Emissions to the ambient atmosphere from the equipment proposed in ADP application CL-3156 consist of carbon monoxide (CO), oxides of nitrogen (NO_X), volatile organic compounds (VOC), sulfur dioxide (SO_2), particulate matter (PM), toxic air pollutants (TAPs), and hazardous air pollutants (HAPs).

6.a Boiler. Potential emissions from the combustion of natural gas by this boiler were calculated with the assumption that the boiler could operate at full rated capacity for 8,760 hours per year.

Boiler - Weil-McLain 778

Heat Rate =	0.937 MMBtu/hr
Fuel Type =	Natural Gas
Natural Gas Heat Value =	1,020 Btu/scf for AP-42 emission factors
Natural Gas Heat Value =	1,026 Btu/scf for 40 CFR 98 GHG emission factors
Fuel Consumption =	8.047 MMscf/yr

Pollutant	ppmvd @ 3% O_2	Emission Factor lb/MMBtu	Emission Factor lb/MMscf	lb/hr	tpy	Emission Factor Source
NO_X	70	0.0850	86.7	0.080	0.35	SWCAA
CO	50	0.0370	37.7	0.035	0.15	BACT
VOC		0.0054	5.5	0.0051	0.022	AP-42 Sec. 1.4 (7/98)
SO_X as SO_2		0.00059	0.6	0.00055	0.0024	AP-42 Sec. 1.4 (7/98)
PM		0.0075	7.6	0.007	0.031	AP-42 Sec. 1.4 (7/98)
PM_{10}		0.0075	7.6	0.007	0.031	AP-42 Sec. 1.4 (7/98)
$PM_{2.5}$		0.0075	7.6	0.007	0.031	AP-42 Sec. 1.4 (7/98)
Benzene		2.06E-06	0.0021	1.9E-06	8.4E-06	AP-42 Sec. 1.4 (7/98)
Formaldehyde		7.35E-05	0.075	6.9E-05	3.0E-04	AP-42 Sec. 1.4 (7/98)

Greenhouse Gases	kg/MMBtu	GWP	CO_2e lb/MMBtu	CO_2e lb/MMscf	tpy, CO_2e	Emission Factor Source
CO_2	53.06	1	116.98	120,019	480.1	40 CFR 98
CH_4	0.001	25	0.055	56.55	0.2	40 CFR 98
N_2O	0.0001	298	0.066	67.41	0.3	40 CFR 98
Total GHG - CO_2e			117.098	120,143	480.6	

Emissions must be calculated using the emission factors identified above unless new emission factors are provided by the manufacturer or developed through source testing and are approved by SWCAA.

6.b Emergency Generator Diesel Engine. Potential emissions from the combustion of ultra-low sulfur diesel (<0.0015% sulfur by weight) by the emergency generator diesel engine were calculated with the assumption that the equipment will operate at full rated capacity for 200 hours per year.

Emergency Generator Diesel Engine - Cummins / VT12-600

Hours of Operation =	200	hours per year
Power Output =	538	horsepower
Fuel Type =		Ultra-low Sulfur Diesel
Diesel Density =	7.206	pounds per gallon
Fuel Sulfur Content =	0.0015	% by weight
Fuel Consumption Rate =	27.29	gallons per hour (estimate)
Fuel Heat Content =	0.138	MMBtu/gal (for use with GHG factors from 40 CFR 98)
Fuel Consumption =	5,458	gallons per year

Pollutant	Emission Factor lb/hp-hr	Emission Factor lb/hr	Emissions tpy	Emission Factor Source
NO_X	0.0310	16.68	1.67	AP-42 Table 3.3-1 (10/96)
CO	0.0067	3.59	0.36	AP-42 Table 3.3-1 (10/96)
VOC	0.00247	1.33	0.13	AP-42 Table 3.3-1 (10/96)
SO_X as SO_2	0.000011	0.0059	0.00059	Mass Balance
PM	0.00220	1.18	0.12	AP-42 Table 3.3-1 (10/96)
PM_{10}	0.00220	1.18	0.12	AP-42 Table 3.3-1 (10/96)
$PM_{2.5}$	0.00220	1.18	0.12	AP-42 Table 3.3-1 (10/96)

Greenhouse Gases	kg/MMBtu	GWP	CO_2e lb/MMBtu	CO_2e lb/gallon	tpy, CO_2e	
CO_2	73.96	1	163.054	22.501	61.406	40 CFR 98
CH_4	0.003	25	0.165	0.023	0.062	40 CFR 98
N_2O	0.0006	298	0.394	0.054	0.148	40 CFR 98
Total GHG - CO_2e			163.613	22.579	61.617	

6.c Facility-wide Potential Emissions Summary.

Pollutant	Potential Annual Emissions (tpy)
Nitrogen oxides	2.02
Carbon monoxide	0.51
Volatile organic compounds	0.16
Sulfur oxides as sulfur dioxide	0.00
Particulate matter	0.15
PM_{10}	0.15
$PM_{2.5}$	0.15
Toxic Air Pollutants	0.00
Hazardous Air Pollutants	0.00

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 Title 40 Code of Federal Regulations (40 CFR) 60.7 "Notification and Recordkeeping" requires that notification shall be submitted to SWCAA, the delegated authority, for date construction commenced, anticipated initial startup, and initial startup.

7.b 40 CFR Part 60.8 "Performance Tests" requires that emission tests be conducted according to test methods approved in advance by the permitting authority and a copy of the results be submitted to the permitting authority.

7.c 40 CFR Part 60.4200 et seq. "Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines" requires that new diesel engines meet specific emission standards at the point of manufacture and during operation. In addition, maximum fuel sulfur contents are specified and minimum maintenance standards are established. The emergency generator diesel engine is not an affected source because it was manufactured before the relevant applicability date (April 1, 2006).

7.d 40 CFR Part 63.7 "Performance Testing Requirements" requires that emission tests be conducted according to test methods approved in advance by the permitting authority and a copy of the results be submitted to the permitting authority.

7.e 40 CFR Part 63.6580 et seq. "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. Diesel engines installed at area sources before June 12, 2006, are "existing" for the purposes of this rule. Emergency stationary RICE for existing residential, commercial, or institutional locations with limited usage at area sources are not subject to this subpart. New diesel engines at residential, commercial, or institutional sources are subject to this subpart. A "new" stationary RICE at an area source must comply with Subpart ZZZZ by meeting the requirements of 40 CFR 60 Subpart IIII for compression ignition engines or 40 CFR 60 Subpart JJJJ for spark ignition engines. The emergency generator diesel engine is not subject to this regulation. SWCAA currently has delegation for this regulation for major sources only and has chosen not to independently implement the associated requirements. This facility is not a major source.

7.f 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 [RCW 70A.15] 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.g 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 ADP for installation and establishment of an air contaminant source.

7.h Washington Administrative Code (WAC) 173-460 "Controls for New Sources of Toxic Air Pollutants" (as in effect August 21, 1998) 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.

7.i WAC 173-476 "Ambient Air Quality Standards" establishes ambient air quality standards for PM_{10}, $PM_{2.5}$, lead, sulfur dioxide, nitrogen dioxide, ozone, and carbon monoxide in the ambient air, which shall not be exceeded.

7.j 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.k SWCAA 400-040(1) "Visible Emissions" requires that no emission of an air contaminant from any emissions unit shall exceed twenty percent opacity for more than three minutes in any one hour at the emission point, or within a reasonable distance of the emission point.

7.l SWCAA 400-040(4) "Odors" requires that any person who shall cause or allow the generation of any odor from any source, which may unreasonably interfere with any other property owner's use and enjoyment of the property, must use recognized good practices and procedures to reduce these odors to a reasonable minimum.

7.m SWCAA 400-040(6) "Sulfur Dioxide" requires that no person shall emit a gas containing in excess of 1,000 ppmd of SO_2, corrected to 7% O_2 or 12% CO_2 as required by the applicable emission standard for combustion sources.

7.n 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.o SWCAA 400-060 "Emission Standards for General Process Units" requires that all new and existing sources not emit particulate matter in excess of 0.1 grains per dry standard cubic foot of exhaust gas.

7.p SWCAA 400-109 "Air Discharge Permit Applications" requires that an ADP 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 ADP application to request such changes. An ADP 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.q SWCAA 400-110 "New Source Review" requires that an ADP be issued by SWCAA prior to establishment of the new source, emission unit, or modification.

7.r 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) BACT 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.

This facility has equipment located in the Portland/Vancouver Maintenance Plan Area; therefore, this regulation is applicable to this facility.

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

The proposed equipment and control systems have been evaluated to determine if they meet the requirements of Best Available Control Technology (BACT) and Best Available Control Technology for toxics (T-BACT) for the types and amounts of air contaminants emitted by the processes and equipment as described below:

8.a BACT Determination – Natural Gas-fired Boiler. The boiler is an existing unit. Similar units of the same make and model in SWCAA's jurisdiction have been permitted at 70 ppmvd NO_X @ 3% O_2 and 50 ppmvd CO @ 3% O_2. These levels meet the requirements of BACT for this age and style of equipment. In order to assure that the boiler remains within emission levels that meet the requirements for BACT, the permit will require corrective action when the average NO_X and CO emissions exceed 70 ppmvd or 50 ppmvd respectively when corrected to 3% O_2.

8.b BACT Determination – Emergency Generator Diesel Engine. Available control measures for diesel engines include low sulfur fuel and add-on control equipment such as selective catalytic reduction units. The use of add-on control equipment is not economically or technically feasible because the engine will be operated only for short periods of time for testing, maintenance, and to provide emergency electricity. Because the engine will normally be operated only for short periods of time, the stable operating temperature required for operation of add-on control equipment will not be achieved.

The use of modern diesel-fired internal combustion engine design, ultra-low sulfur diesel fuel ($\leq$ 0.0015% sulfur by weight), limitation of visible emissions to 10% opacity or less, and limitation of engine operation to maintenance checks, readiness testing, and emergency use ($\leq$200 hours per year) has been determined to meet the requirements of BACT for the types and quantities of air contaminants emitted from this engine.

8.c Prevention of Significant Deterioration (PSD) Applicability Determination. This permitting action will not result in a potential emissions increase equal to or greater than applicable PSD thresholds. Therefore, requirements of the PSD program are not applicable to this action.

8.d Compliance Assurance Monitoring (CAM). CAM is not applicable to any emission unit at this facility because this facility is not a major source required to obtain a Part 70 or 71 permit.

9. AMBIENT IMPACT ANALYSIS

9.a Criteria Air Pollutant Review. Emissions of NO_X, CO, PM, VOC (as a precursor to O_3), and SO_2 are emitted at levels where no adverse ambient air quality impact is anticipated.

9.b TAP Small Quantity Review. The TAP emissions associated with this facility 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.c Operation of the existing boiler and emergency generator diesel engine, as proposed in ADP application CL-3156, will not cause a violation of the ambient air quality standards established by 40 CFR 50 "National Primary and Secondary Ambient Air Quality Standards."

9.d The existing boiler and emergency generator diesel engine, as proposed in ADP application CL-3156, will not cause a violation of the requirements of WAC 173-460 "Controls for New Sources of Toxic Air Pollutants" (in effect August 21, 1998) or WAC 173-476 "Ambient Air Quality Standards."

9.e Operation of the existing boiler and emergency generator diesel engine, as proposed in ADP application CL-3156, 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 21-3479 in response to ADP application CL-3156. ADP 21-3479 contains approval requirements deemed necessary to assure compliance with applicable regulations and emission standards, as discussed below.

10.a General Basis. Approval conditions for equipment affected by this permitting action incorporate the operating schemes proposed by the permittee in the ADP application and previous applications for the facility.

10.b Facility-wide Emission Limits. Emissions from the emergency generator diesel engine were estimated at the quantity generated from operation of the engine for 200 hours per year for emergency use, maintenance checks, and readiness testing using the emission factors supplied in Section 6. The engine can operate for unlimited hours per year for actual emergency conditions. Visible emissions from the emergency generator diesel engine were limited to 10% opacity.

Emissions for the boiler were limited to the quantity of emissions anticipated from operation of the emissions unit for 8,760 hours per year at full rated load using the emission factors supplied in Section 6. Visible emissions from the natural gas-fired boiler were limited to 0% opacity.

10.c Operating Limits and Requirements. Only ultra-low sulfur (15 ppm or less) fuel may be used for the emergency generator diesel engine. This is consistent with BACT and the requirements of 40 CFR 60 Subpart IIII.

Consistent with 40 CFR 60 Subpart IIII, except for emergency operation, the emergency generator diesel engine may only operate 100 hours or fewer per year for maintenance and readiness testing. This limitation also assures that emissions from the engine will be below a threshold where additional control equipment would be necessary to meet the requirements of BACT.

If the results of performance monitoring of the boiler indicate emissions in excess of the level of emissions indicating proper operation and BACT (70 ppmvd NO_X @ 3% O_2 and 50 ppmvd CO @ 3% O_2), corrective action must be taken to restore proper operation. This is consistent with good air pollution practice to minimize emissions.

10.d Monitoring and Recordkeeping. The hours of operation of the emergency generator diesel engine and the amount of natural gas consumed by the boiler must be recorded once per year to calculate annual emissions.

Fuel certificates for the emergency generator diesel engine fuel purchases must be kept to demonstrate that ultra-low sulfur fuel is being purchased for the emergency generator diesel engine.

The permittee is required to record each occurrence of maintenance and repairs to applicable equipment so that SWCAA and the permittee can assure that the equipment is being maintained properly and evaluate whether emission factors remain valid.

10.e Emission Monitoring and Testing Requirements. See Section 12.

10.f Reporting. Specific reporting deadlines were established for each reporting requirement. The submittal date refers to the earlier of the date the report is delivered to SWCAA or the postmarked date if sent through the US Post Office.

The permit requires reporting of the annual air emissions inventory. Upset conditions with the potential to cause excess emissions must be reported immediately in order to qualify for relief from penalty in accordance with SWCAA 400-107 for unavoidable exceedances. In addition, prompt reporting allows for prompt and accurate investigation into the cause of the event and the prevention of similar future incidents.

11. STARTUP AND SHUTDOWN/ALTERNATIVE OPERATING SCENARIOS/POLLUTION PREVENTION

11.a Startup and Shutdown Provisions. Pursuant to SWCAA 400-081 "Startup 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 startup or shutdown. Where it is determined that a source is not capable of achieving continuous compliance with an emission standard during startup or shutdown, SWCAA shall include appropriate emission limitations, operating parameters, or other criteria to regulate performance of the source during startup or shutdown.

The emergency generator diesel engine may exhibit excess opacity upon startup. Accordingly, the opacity limit for the engine is not applicable during the startup period defined in the permit.

11.b Alternate Operating Scenarios. SWCAA conducted a review of alternate operating scenarios applicable to equipment affected by this permitting action. The applicant did not propose or identify any applicable alternate operating scenarios. Because neither SWCAA nor the applicant identified any alternate operating scenarios, none were accommodated in the approval conditions.

11.c Pollution Prevention Measures. SWCAA conducted a review of possible pollution prevention measures for the facility. No pollution prevention measures other than the control measures identified in the permit were identified by either the permittee or SWCAA separate or in addition to those measures required under BACT considerations. Therefore, no additional measures were included in the approval conditions.

12. EMISSION MONITORING AND TESTING

Due to the nature and quantity of air pollutant emissions from the emergency generator diesel engine and the fact that post-combustion controls are not utilized, performance monitoring and/or testing requirements were not established in the Permit for the emergency generator diesel engine.

Performance monitoring of the boiler with a combustion analyzer or equivalent is required at least annually. In SWCAA's experience, this monitoring is relatively inexpensive compared to the quantity of emissions that can be prevented by this procedure. It is unlikely that boiler emissions will degrade rapidly enough that more frequent monitoring is necessary to maintain proper operation.

13. HISTORY

The Old City Hall building was previously owned by the Vancouver School District and has since been sold to Block 56 LLC. The Vancouver School District leased the property to the city until approximately December 2011, when the city constructed a new City Hall building and vacated.

13.a Previous Approvals/Permits/Orders. There have been no previous ADPs issued for this facility.

14. PUBLIC INVOLVEMENT

14.a Public Notice for Air Discharge Permit Application CL-3156. Public notice for ADP application CL-3156 was published on the SWCAA internet website on March 30, 2021.

14.b Public/Applicant Comment for Air Discharge Permit Application CL-3156. SWCAA did not receive formal comments, a comment period request, or any other inquiry from the public or the applicant regarding this ADP application. Therefore, no public comment period was provided for this permitting action.

14.c State Environmental Policy Act. A Determination of Non-Significance (SWCAA 21-027) was issued for this permitting action by SWCAA on August 31, 2021.