



May 25, 2022

Mr. Nick Massie
Rotschy Inc.
7408 NE 133th Circle
Vancouver, WA 98662

RE: Final Air Discharge Permit for Two New Rock Crushers Powered by Associated Nonroad Diesel Engines

Dear Mr. Massie:

A final determination to issue Air Discharge Permit (ADP / Nonroad Engine Permit 22-3512 has been completed for ADP / Nonroad Engine Permit Application CL-3188 pursuant to Section 400-110(4) of the General Regulations for Air Pollution Sources of the Southwest Clean Air Agency (SWCAA). Public notice for ADP / Nonroad Engine Application CL-3188 was published in the permit section of SWCAA's website on April 27, 2022. 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 ADP 22-3512 and the associated Technical Support Document are available for public review in the "Recent Air Discharge Permits" section under the "Air Permits" link on SWCAA's website (<http://www.swcleanair.gov>). Original copies are enclosed for your files.

ADP 22-3512 may be appealed directly to the Pollution Control Hearings Board (PCHB) at P.O. Box 40903, Olympia, Washington 98504-0903 within thirty (30) days of receipt as provided in Revised Code of Washington (RCW) 43.21B.

If you have any questions or comments, or desire additional information, please contact me or Danny Phipps at (360) 574-3058, extension 124.

Sincerely,

Uri Papish for Uri Papish

Uri Papish
Executive Director

UP:edp

Enclosure: Technical Support Document and Air Discharge Permit 22-3512





**AIR DISCHARGE PERMIT / NONROAD ENGINE PERMIT
22-3512**

Issued: May 25, 2022

Rotschy Inc.
913 NE 172nd Avenue
Vancouver, WA 98665

SWCAA ID – 2435

REVIEWED BY: _____

Clinton H. Lamoreaux
Clinton Lamoreaux, 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	Parker Jaw Crusher	High pressure wet suppression at crusher entrance
2	Metso Cone Crusher #30-19	High pressure wet suppression at crusher entrance
3	Nordtrack J127 Jaw Crusher #30-20	High pressure wet suppression at crusher entrance
4	KPI Impact Crusher #30-17	High pressure wet suppression at crusher entrance
5	McCloskey Screen #30-10	High pressure wet suppression at screen deck
6	McCloskey Screen #30-12	High pressure wet suppression at screen deck
7	McCloskey Screen #30-13	High pressure wet suppression at screen deck
8	MGL Stacking Conveyor #30-15	Wet suppression
9	Haul Roads and Conveyors	Wet suppression
10	Engine - Whisperwatt Generator (stationary) (John Deere - 150 hp)	Ultra-low sulfur diesel, EPA Tier 2 Certification
11	Engine - Parker Jaw Crusher (nonroad) (Caterpillar - 362 hp)	Ultra-low sulfur diesel, EPA Tier 1 Certification
12	Engine - Metso Crusher (nonroad) (Komatsu - 540 hp)	Ultra-low sulfur diesel, EPA Tier 3 Certification
13	Engine - Nordtrack Crusher #30-20 (nonroad) (Caterpillar – 350 hp)	Ultra-low sulfur diesel, EPA Tier 4 Certification
14	Engine - KPI Impact Crusher #30-17 (nonroad) (Caterpillar - 440 hp)	Ultra-low sulfur diesel, EPA Tier 4 Certification
15	Engine - McCloskey Screen #30-10 (nonroad) (Caterpillar - 127 hp)	Ultra-low sulfur diesel, EPA Tier 4 Certification
16	Engine - McCloskey Screen #30-12 (nonroad) (Caterpillar - 129 hp)	Ultra-low sulfur diesel, EPA Tier 3 Certification
17	Engine - McCloskey Screen #30-13 (nonroad) (Caterpillar - 129 hp)	Ultra-low sulfur diesel, EPA Tier 3 Certification
18	Engine - MGL Stacking Conveyor (nonroad) (Caterpillar - 73 hp)	Ultra-low sulfur diesel, EPA Tier 4 Certification

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 requirement is contained in the

middle column. The emission unit, equipment, or activity to which the requirement applies is listed in the right-hand column.

ADP 22-3512 supersedes ADP 20-3414 in its entirety.

Emission Limits

Req. No.	Emission Limits	Equipment/ Activity ID No.								
1.	<p>Emissions from crushing and screening operations (blasting, crushing, screening, and haul roads) must not exceed:</p> <table><thead><tr><th>Pollutant</th><th>Emission Limit</th></tr></thead><tbody><tr><td>Particulate Matter, PM₁₀, total</td><td>1.18 tpy</td></tr><tr><td>Particulate Matter, PM_{2.5}, total</td><td>0.18 tpy</td></tr></tbody></table> <p>The long-term emission limits are 12-month rolling sums calculated consistent with Section 6 of the TSD for this ADP.</p>	Pollutant	Emission Limit	Particulate Matter, PM ₁₀ , total	1.18 tpy	Particulate Matter, PM _{2.5} , total	0.18 tpy	1-9		
Pollutant	Emission Limit									
Particulate Matter, PM ₁₀ , total	1.18 tpy									
Particulate Matter, PM _{2.5} , total	0.18 tpy									
2.	<p>Emissions from the Whisperwatt Generator Engine must not exceed any of the following:</p> <table><thead><tr><th>Pollutant</th><th>Emission Limit</th></tr></thead><tbody><tr><td>Nitrogen Oxides</td><td>1.55 tpy</td></tr><tr><td>Carbon Monoxide</td><td>0.27 tpy</td></tr><tr><td>Particulate Matter, PM₁₀, total</td><td>0.06 tpy</td></tr></tbody></table> <p>The long-term emission limits are 12-month rolling sums calculated consistent with Section 6 of the TSD for this ADP.</p>	Pollutant	Emission Limit	Nitrogen Oxides	1.55 tpy	Carbon Monoxide	0.27 tpy	Particulate Matter, PM ₁₀ , total	0.06 tpy	10
Pollutant	Emission Limit									
Nitrogen Oxides	1.55 tpy									
Carbon Monoxide	0.27 tpy									
Particulate Matter, PM ₁₀ , total	0.06 tpy									
3.	<p>Visible emissions from crushing, screening, and conveying equipment must not exceed 0% 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).</p>	1-9								
4.	<p>Visible emissions from on-road vehicles on haul roads must not exceed 10% 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). This does not include in-pit activities by non-road equipment.</p>	9								
5.	<p>Visible emissions from diesel engines operating in support of crushing and screening operations must not exceed 5% opacity for more than 3 minutes in any one hour period as determined in accordance with SWCAA Method 9, except during periods of startup.</p> <p>For the purposes of this requirement, a startup period ends when the earlier of the following operating events occurs:</p> <ul style="list-style-type: none">a) The engine has reached normal operating temperature; orb) The engine has been operating for 15 minutes.	10-18								

Operating Limits and Requirements

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
6.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
7.	Operations that cause or contribute to a nuisance odor must use recognized good practice and procedures to reduce these odors to a reasonable minimum.	Facility-wide
8.	Emission units and activities identified in this ADP must be maintained and operated in total and continuous conformity with the conditions identified 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
9.	Each pollution control device must be operated whenever the processing equipment served by that air pollution control device is in operation. Control devices must be operated and maintained in accordance with the manufacturer's specifications. Furthermore, air pollution control devices must be operated in a manner that minimizes emissions.	1-7
10.	Material handling points including, but not limited to, conveyor transfer points, aggregate storage piles, and haul roads must be watered as necessary to control fugitive dust emissions.	Facility-wide
11.	Diesel Engines must only be fired on fuel oil with a maximum sulfur content of 15 ppmw. Any fuel other than ultra-low sulfur fuel oil must be approved by SWCAA in writing prior to use.	10-18
12.	All engines must be equipped with a non-resettable hour meter to record hours of operation.	10-18
13.	The permittee must notify SWCAA at least 10 business days in advance of relocating approved equipment and must submit operational information (production quantities, hours of operation, location of nearest neighbor, etc.) sufficient to demonstrate that the proposed operation will comply with the emission standards for a new source, and will not cause a violation of applicable ambient air quality standards, and if in a nonattainment area, will not interfere with scheduled attainment of ambient standards.	1-18
14.	Each crusher and screen must be equipped with a high-pressure water spray system or other wet suppression system reviewed and approved in advance by SWCAA to provide equivalent or superior control of particulate matter emissions. Each high-pressure spray system must be capable of maintaining an operating pressure of 80 psig or greater and must maintain 80 psig or greater during operation. A functional pressure gauge must be maintained onsite and a connection point provided for the purpose of demonstrating compliance with the minimum pressure requirement for high pressure spray systems.	1-7
15.	Spray/fog nozzles in the water spray systems for each rock crusher and aggregate screen must be visually inspected once per week when in operation to ensure proper function. Clogged or defective nozzles must be replaced or repaired prior to subsequent operation.	1-7

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
16.	Operation of the Whisperwatt Generator Engine must not exceed 2,000 hours per year.	10

Monitoring and Recordkeeping Requirements

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
17.	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, at minimum. If a control device or process is not operating, a record must be made to that effect.	Facility-wide
18.	All records required by this ADP must be kept for a minimum period of no less than three (3) years and must be maintained in a form readily available for inspection by SWCAA representatives.	Facility-wide
19.	Excess emissions and upset conditions must be recorded for each occurrence.	Facility-wide
20.	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) Visual inspection and maintenance of spray/fog nozzles must be recorded for each occurrence; b) Maintenance of spray/fog nozzles must be recorded for each occurrence; c) Quantity and size of material throughput must be recorded monthly for each site; d) Air quality related complaints must be recorded for each occurrence; e) The number of hours each engine is operated must be recorded for each site and each calendar year; f) The fuel sulfur content of the diesel burned in each engine must be determined and recorded for each fuel delivery. A fuel certification from the fuel supplier or test results using an appropriate method listed in 40 CFR 60.17 may be used to comply with this requirement; and g) Each time equipment identified in this permit is relocated; the date of the relocation and the new location must be recorded. 	Facility-wide

Emission Monitoring and Testing Requirements

Req. No.	Emission Monitoring and Testing Requirements	Equipment/ Activity ID No.
21.	An initial emissions test must be conducted for all rock crushing and screening equipment subject to 40 CFR 60 Subpart OOO that has not previously been tested. Testing must be completed no later than 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup. For the purposes of this requirement, the 60 and 180 day clocks begin the day this permit is issued. All emission testing must be conducted in accordance with Appendix A of this Permit and the requirements of 40 CFR 60, Subpart OOO "Standards of Performance for Nonmetallic Mineral Processing Plants."	2-3

Reporting Requirements

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
22.	Excess emissions must be reported to SWCAA as follows: <ul style="list-style-type: none"> 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
23.	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
24.	All air quality related complaints received by the Permittee must be reported to SWCAA within three (3) calendar days of receipt. Complaint reports must include the date and time of the complaint, the name and contact information (if available) for the complainant, the nature of the complaint, and any actions taken by the Permittee to address the complaint.	Facility-wide
25.	The following emission-related information must be reported to SWCAA by March 15 th for the previous calendar year: <ul style="list-style-type: none"> a) The quantity of rock blasted at each location; b) The quantity and size of material crushed at each location; c) The quantity of each type of material screened at each location; d) The average length of unpaved haul road controlled by the permittee at each location; e) The number of hours each engine operated; and f) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs). 	Facility-wide
26.	The results of all emission testing required by this ADP must be reported to SWCAA in writing within forty-five (45) calendar days of test completion.	Facility-wide

3. General Provisions

Req. No.	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.	This ADP will be invalidated, in whole or in part, if construction or installation of any new or modified equipment has not commenced within eighteen (18) months from date of issuance, if construction is discontinued for a period of eighteen (18) months or more without prior SWCAA approval, or if construction 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 Testing Requirements
Rock Crushing / Screening Equipment

1. Background

- a. The purpose of this emission testing requirement is to demonstrate compliance with the visual emissions limitations of this Permit and 40 CFR 60, Subpart 000 "Standards of Performance for Nonmetallic Mineral Processing Plants."
- b. Emission testing must be performed within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after permit issuance for each applicable rock crusher and associated screen and conveyor which has not previously conducted an initial emissions test consistent with the requirements of 40 CFR 60.8 and 60.675. For the purposes of this requirement, the 60 and 180 day clocks begin the day this permit is issued. If the unit is not in SWCAA's jurisdiction within this time frame or leaves SWCAA's jurisdiction within this time frame, the emission testing must be conducted within 60 days of coming into, or returning to, SWCAA's jurisdiction.
- c. SWCAA personnel must be informed of the proposed test date and location at least five business days prior to testing so that a representative may be present during testing.
- d. A minimum of 30 minutes of observations must be conducted as required by 40 CFR 60.675(c)(3).
- e. Testing must include all constituents identified below. The sampling methods identified in Section 2 below must be used unless alternate methods are approved by SWCAA in advance of the emission testing.

2. Test Constituents and Test Methods

- a.

<u>Constituents to be measured:</u>	<u>Test Method:</u>
(1) Opacity of visible emissions	EPA Method 9
- b. Process Points to Be Tested:
 - (1) Affected rock crushers and aggregate screens; and
 - (2) Each conveyor transfer point associated with affected emission units.

3. Source Operation

- a. A complete record of production related parameters including production rate, size of product being processed, startups, shutdowns, and adjustments must be kept during emissions testing to correlate operations with emissions and must be recorded in the test results report.
- b. Source operations during the emissions test must be representative of maximum intended operating conditions.

Appendix A
Emission Testing Requirements
Rock Crushing / Screening Equipment

4. Test Plan and Notification

A comprehensive test plan must be submitted to SWCAA for review and approval a minimum of ten (10) business days prior to the proposed test date. SWCAA must be notified a minimum of three (3) business days prior to the proposed test date so that a SWCAA representative may be present during testing.

5. Reporting Requirements

- a. Opacity observation data must be reduced and analyzed using the protocols in EPA Method 9 and SWCAA Method 9.
- b. Compliance must be determined by comparing the reduced opacity data with the visible emission limits contained in this Permit and the New Source Performance Standard for Nonmetallic Mineral Processing Plants (40 CFR 60.670 et seq. (Subpart OOO)).
- c. A final emission test report must be prepared and submitted to SWCAA within 45 calendar days of test completion. Unless otherwise directed by SWCAA, each report must be provided in an electronic format acceptable to SWCAA (e.g. portable document format), and as a hard (paper) copy. Each report must include:
 - (1) A description of the source including manufacturer, model number, serial number, and design capacity of the equipment, and the location of the sample ports or test locations;
 - (2) Time and date of the test and identification and qualifications of the personnel involved, including identification of any SWCAA staff on-site during testing (if any);
 - (3) A summary of results, reported in units and averaging periods consistent with the applicable emission standard or limit;
 - (4) A summary of control system or equipment operating conditions;
 - (5) A summary of production related parameters (tons per hour and size of product);
 - (6) A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation;
 - (7) A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation;
 - (8) Copies of field data and example calculations;
 - (9) Chain of custody information;
 - (10) Discussion of any abnormalities associated with the results; and
 - (11) A statement signed by the senior management official of the testing firm certifying the validity of the source test report.

6. Changes to Testing Requirements

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