



March 30, 2023

Mr. Jonathan James, Operations Manager
City Bark and Recycling, LLC
2419 NE Andresen Road
Vancouver, WA 98661

Subject: Final Air Discharge Permit for Operation of an Aggregate Crushing Plant

Dear Mr. James:

A final determination to issue Air Discharge Permit 23-3571 (ADP 23-3571) has been completed for Air Discharge Permit (ADP) Application CO-1063 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 Application CO-1063 was published in the permit section of SWCAA's internet website on January 6, 2023. 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 23-3571 and the associated Technical Support Document are available for public review in the permit section of SWCAA's internet website (<http://www.swcleanair.gov/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 Wess Safford at (360) 574-3058, extension 126.

Sincerely,

Uri Papish
Executive Director

UP:wls

Enclosure – Air Discharge Permit 23-3571 and Technical Support Document





SWCAA
Southwest Clean Air Agency


**AIR DISCHARGE PERMIT / NONROAD ENGINE PERMIT
23-3571**

Issued: March 30, 2023

City Bark
850 Caples Road, Woodland, WA 98674

SWCAA ID - 2770

REVIEWED BY:


Clinton Lamoreaux, Chief Engineer



APPROVED BY:


Uri Papish, Executive Director

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Aggregate Crushing Equipment	

1. Equipment/Activity Identification

ID No.	Equipment/Activity	Control Measure/Equipment
1	Rock Crusher (Tesab - Impact)	High Pressure Spray System
2	Aggregate Screen (CEC – Two deck)	High Pressure Spray System
3	Haul Roads and Conveyors	Wet Suppression
4	Diesel Engine (Caterpillar – 455 bhp)	Ultra-low Sulfur Diesel ($\leq 0.0015\%$ by wt)
5	Diesel Engine (Deutz – 104 bhp)	Ultra-low Sulfur Diesel ($\leq 0.0015\%$ by wt)

2. Approval Conditions

The following tables detail the specific requirements of this permit. In addition to the requirements listed below, equipment at this facility may be subject to other federal, state, and local regulations. The permit requirement number is identified in the left-hand column. The text of the permit 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. No.	Emission Limits	Equipment/ Activity ID No.						
1.	<p>Combined emissions from aggregate crushing operations (crushing, material handling, and haul roads) must not exceed:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>PM₁₀</td><td>0.99 tpy</td></tr><tr><td>PM_{2.5}</td><td>0.15 tpy</td></tr></table> <p>Annual emissions must be calculated from actual material throughput consistent with the methodology in Section 6 of the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM ₁₀	0.99 tpy	PM _{2.5}	0.15 tpy	1-3
<u>Pollutant</u>	<u>Emission Limit</u>							
PM ₁₀	0.99 tpy							
PM _{2.5}	0.15 tpy							
2.	Visible emissions from crushing 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).	1-2						
3.	Visible emissions from 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).	3						
4.	<p>Visible emissions from the nonroad diesel engines must not exceed 5% percent opacity for more than 3 minutes in any one hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400) except during startup. For the purposes of this requirement, the startup period ends when the earlier of the following operating events occurs:</p> <ul style="list-style-type: none">(a) The engine has reached normal operating temperature; or(b) The engine has been operating for 15 minutes.	4-5						

Operating Limits and Requirements

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
5.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
6.	The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facility-wide
7.	Material handling points including, but not limited to, conveyor transfer points, aggregate storage piles, and haul roads must be watered as necessary to minimize fugitive dust emissions.	Facility-wide
8.	Each pollution control device (e.g., water spray or fog systems) must be operated whenever the processing equipment served by that control device is in operation. Control devices must be operated and maintained in accordance with the manufacturer's specifications. Furthermore, control devices must be operated in a manner that minimizes emissions.	1-3
9.	Emission units identified in this Permit must be maintained and operated in total and continuous conformity with the conditions identified in this Permit. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this Permit, including directing the facility to cease operations until corrective action can be completed.	1-5
10.	The rock crusher and aggregate screen must be equipped with a high pressure water spray system or other wet suppression system approved by SWCAA to provide equivalent or superior control of particulate matter emissions. The wet suppression system must control dust at the inlet to the crusher and screen. 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.	1-2
11.	Spray/fog nozzles in high pressure water spray systems 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.	1-2
12.	Nonroad engines must only be fired on #2 diesel or better. The sulfur content of the fuel fired in the diesel engines must not exceed 0.0015% by weight (15 ppmw). A fuel certification from the fuel supplier or test results using an appropriate method listed in 40 CFR 60.17 may be used to demonstrate compliance with this requirement.	4-5
13.	A nonresettable time totalizer must be installed and used to measure the number of hours each nonroad engine operates.	4-5

Monitoring and Recordkeeping Requirements

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.														
14.	All air quality related complaints, including odor complaints, received by the permittee and the results of any subsequent investigation or corrective action must be recorded for each occurrence.	Facility-wide														
15.	With the exception of data logged by a computerized data acquisition system, each record required by this Permit must include the date and the name of the person making the record entry. If a control device or process is not operating during a specific time period, a record must be made to that effect.	1-5														
16.	All records required by this Permit must be kept for a minimum period of no less than three years and must be maintained in a form readily available for inspection by SWCAA representatives.	1-5														
17.	Excess emissions must be recorded for each occurrence.	1-5														
18.	<div>The following information must be collected, recorded at the intervals specified below, and readily available on-site for inspection:</div> <table><tr><td>(a) Quantity and size of material crushed</td><td>Recorded monthly for each site</td></tr><tr><td>(b) Hours of nonroad diesel engine operation</td><td>Recorded for each site and each calendar year</td></tr><tr><td>(c) Average length of unpaved haul road controlled by the permittee</td><td>Recorded for each site</td></tr><tr><td>(d) Visual inspection of spray/fog nozzles</td><td>Recorded for each occurrence</td></tr><tr><td>(e) Maintenance of spray/fog nozzles</td><td>Recorded for each occurrence</td></tr><tr><td>(f) Fuel sulfur content of diesel fired in the nonroad diesel engine</td><td>Recorded for each fuel delivery</td></tr><tr><td>(g) Relocation of approved equipment</td><td>Recorded for each occurrence</td></tr></table>	(a) Quantity and size of material crushed	Recorded monthly for each site	(b) Hours of nonroad diesel engine operation	Recorded for each site and each calendar year	(c) Average length of unpaved haul road controlled by the permittee	Recorded for each site	(d) Visual inspection of spray/fog nozzles	Recorded for each occurrence	(e) Maintenance of spray/fog nozzles	Recorded for each occurrence	(f) Fuel sulfur content of diesel fired in the nonroad diesel engine	Recorded for each fuel delivery	(g) Relocation of approved equipment	Recorded for each occurrence	1-5
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(g) Relocation of approved equipment	Recorded for each occurrence															

Emission Monitoring and Testing Requirements

Req. No.	Emission Monitoring and Testing Requirements	Equipment/ Activity ID No.
19.	An initial emission test must be conducted for all rock crushing equipment listed in this Permit subject to 40 CFR 60, Subpart OOO that has not been previously tested. Emission testing must be conducted no later than 60 days after achieving the maximum production rate and no later than 180 days after permit issuance. All emission testing must be conducted in accordance with Appendix A of this Permit and the requirements of 40 CFR 60, Subpart OOO. If an emission test meeting the requirements of 40 CFR 60 Subpart OOO has already been performed for a specific unit, submittal of the test report to SWCAA within the timeline described above satisfies this testing requirement.	1-3

Reporting Requirements

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
20.	All air quality related complaints received by the permittee must be reported to SWCAA within three days of receipt. Complaint reports must include the following information: (a) Date and time of the complaint; (b) Name of the complainant; (c) Nature of the complaint; and (d) Description of corrective action taken in response to complaint (if any).	Facility-wide
21.	Excess emissions must be reported to SWCAA as follows: (a) As soon as possible, but no later than 12 hours after discovery for emissions that represent a potential threat to human health or safety; (b) As soon as possible, but no later than 48 hours after discovery for emissions which the permittee wishes to claim as unavoidable pursuant to SWCAA 400-107(1); and (c) No later than 30 days after the end of the month of discovery for all other excess emissions.	1-5
22.	The following emission-related information must be reported to SWCAA by March 15 th for the previous calendar year: (a) Quantity and size of material crushed at each site; (b) Hours of nonroad engine operation at each site; (c) Average length of unpaved haul road controlled by the permittee at each site; and (d) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs) for each site.	1-5
23.	The permittee must notify SWCAA at least 10 business days in advance of relocating approved equipment to, from, or within SWCAA's jurisdiction. The permittee must submit operational information (production quantities, hours of operation, etc.) sufficient to demonstrate that proposed operation will comply with the emission standards for a new source, and will not cause a violation of applicable ambient air quality standards.	1-5
24.	Emission test results must be reported to SWCAA in writing within 45 days of test completion.	1-3

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.

Req. No.	General Provisions
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 Aggregate Crushing Equipment

1. Introduction:

The purpose of this performance testing requirement is to demonstrate compliance with the visual emissions limitations of this Permit and 40 CFR 60, Subpart OOO.

2. Testing Requirements:

- a. **Testing Schedule.** Emission testing must be performed within 60 days of achieving maximum production rate, but not later than 180 days after permit issuance for each affected facility that has not previously been tested consistent with the requirements of 40 CFR 60.8 and 60.675. If an affected facility is not in SWCAA's jurisdiction within this time frame or leaves SWCAA's jurisdiction within this time frame, emission testing must be conducted within 60 days of coming into, or returning to, SWCAA's jurisdiction.
- b. **Test Plan.** A comprehensive test plan must be submitted to SWCAA for review and approval at least 10 business days prior to each test. SWCAA personnel must be informed of the proposed test date and location at least 5 business days prior to testing so that a representative may be present during testing.
- c. **Test Location.** Visual observations must be made at each affected rock crusher, aggregate screen and conveyor transfer point associated with affected crushers and screens.
- d. **Test Runs / Reference Methods.** A minimum of 30 minutes of observations must be conducted as required by 40 CFR 60.675(c)(3) using the sampling method identified below.

<u>Constituent</u>	<u>Reference Test Method</u>
Opacity	EPA Method 9

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

Aggregate Crushing Equipment

4. 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 40 CFR 60, Subpart OOO.
- c. Unless otherwise directed by SWCAA, a final test report must be prepared and submitted (hard copy and electronic) to SWCAA within 45 calendar days of test completion and, at a minimum, must contain the following information:
 - (1) A description of the source including manufacturer, model 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;
 - (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 cited in Section 3;
 - (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.

5. Changes to Testing Requirements:

The emission 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 to 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.