

March 30, 2023

Tom Howard, Manager  
Sound Placement Services, LLC  
PO Box 1649  
Castle Rock, WA 98611

RE: Final Air Discharge Permit for Replacement Propane Boiler

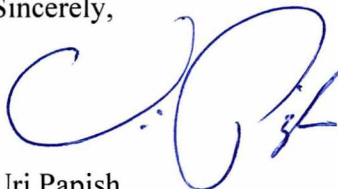
Dear Mr. Howard:

A final determination to issue Air Discharge Permit (ADP) 23-3572 has been completed for ADP Application CO-1065 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-1065 was published in the permit section of SWCAA's website on March 1, 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 23-3572 and the associated Technical Support Document (TSD) 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 23-3572 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  
Executive Director

UP:edp

Enclosure: Technical Support Document and Air Discharge Permit 23-3572





**AIR DISCHARGE PERMIT  
23-3572**

**Issued: March 30, 2023**

**Sound Placement Services**  
4562 Westside Highway  
Castle Rock, WA 98611

**SWCAA ID – 2323**



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**

<b>ID No.</b>	<b>Equipment/Activity</b>	<b>Control Equipment/Measure</b>
1	Concrete Batch Plant (Material Loadout/Handling)	Loading Chute Enclosure, Wet Suppression
2	Cement Silo (McNeilus – 36 ton)	Process Enclosure, Vent Filter
3	Cement Silo (Hagan – 350 barrel)	Process Enclosure, Vent Filter
4	Boiler (1.020 MMBtu/hr)	Low-ash Fuel (Propane)
5	Haul Roads	Low-Pressure Wet Suppression

**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 23-3572 supersedes ADP 20-3415 in its entirety.

**Emission Limits**

<b>Req. No.</b>	<b>Emission Limits</b>	<b>Equipment/Activity ID No.</b>										
1.	<p>Emissions from concrete batch plant operations and haul roads must not exceed any of the following:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th><b>Pollutant</b></th> <th><b>Emission Limit</b></th> </tr> </thead> <tbody> <tr> <td>Nitrogen Oxides</td> <td>0.04 tpy</td> </tr> <tr> <td>Carbon Monoxide</td> <td>0.02 tpy</td> </tr> <tr> <td>Particulate Matter, PM<sub>10</sub>, total</td> <td>0.20 tpy</td> </tr> <tr> <td>Particulate Matter, PM<sub>2.5</sub>, total</td> <td>0.13 tpy</td> </tr> </tbody> </table> <p>The long-term emission limits are 12-month rolling sums calculated consistent with Section 6 of the Technical Support Document (TSD) for this ADP.</p>	<b>Pollutant</b>	<b>Emission Limit</b>	Nitrogen Oxides	0.04 tpy	Carbon Monoxide	0.02 tpy	Particulate Matter, PM <sub>10</sub> , total	0.20 tpy	Particulate Matter, PM <sub>2.5</sub> , total	0.13 tpy	Facility-wide
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Particulate Matter, PM <sub>10</sub> , total	0.20 tpy											
Particulate Matter, PM <sub>2.5</sub> , total	0.13 tpy											
2.	Visible emissions from approved equipment must not exceed zero percent (0%) opacity for more than three (3) minutes in any one-hour period as determined by a certified observer in accordance with SWCAA Method 9.	1-4										
3.	Visible emissions from haul roads must not exceed ten percent (10%) opacity for more than 3 minutes in any one-hour period as determined in accordance with SWCAA Method 9.	5										

**Operating Limits and Requirements**

<b>Req. No.</b>	<b>Operating Limits and Requirements</b>	<b>Equipment/ Activity ID No.</b>
4.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
5.	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
6.	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
7.	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.	Facility-wide
8.	All deliveries of Portland cement must be made via enclosed pneumatic transfer.	2-3
9.	All material storage piles and haul roads must be watered as necessary to minimize fugitive dust emissions.	1,5
10.	Additional water suppression systems must be employed, as necessary, to control fugitive dust from material handling and storage operations in the event that processes or weather patterns change resulting in insufficient water spray application to control fugitive dust.	1-3,5
11.	Propane consumption by the boiler must not exceed 6,000 gallons per year. For the purposes of this requirement, purchase records may be used in lieu of direct fuel consumption monitoring.	4

**Monitoring and Recordkeeping Requirements**

<b>Req. No.</b>	<b>Monitoring and Recordkeeping Requirements</b>	<b>Equipment/ Activity ID No.</b>
12.	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
13.	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
14.	Excess emissions and upset conditions must be recorded for each occurrence.	Facility-wide

<b>Req. No.</b>	<b>Monitoring and Recordkeeping Requirements</b>	<b>Equipment/ Activity ID No.</b>
15.	The following information must be collected, recorded at the intervals specified below, and maintained readily available for on-site inspection: <ul style="list-style-type: none"> <li>(a) The quantity of concrete produced (cubic yards) must be recorded for each calendar year;</li> <li>(b) The quantity of propane (gallons) burned in the boiler must be recorded for each calendar year;</li> <li>(c) The total amount miles driven on the haul roads must be recorded for each calendar year as well as the type of haul road;</li> <li>(d) Maintenance and repair activities that may affect the emissions of air pollutants, must be recorded for each occurrence; and</li> <li>(e) Air quality related complaints received by the permittee and the resulting corrective action must be recorded for each occurrence.</li> </ul>	Facility-wide

### **Emission Monitoring and Testing Requirements**

There are no emission monitoring or testing requirements for the approved equipment cited in this ADP.

### **Reporting Requirements**

<b>Req. No.</b>	<b>Reporting Requirements</b>	<b>Equipment/ Activity ID No.</b>
16.	Excess emissions must be reported to SWCAA as follows: <ul style="list-style-type: none"> <li>(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;</li> <li>(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</li> <li>(c) No later than thirty (30) calendar days after the end of the month of discovery for all other excess emissions.</li> </ul>	Facility-wide
17.	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
18.	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
19.	Upset conditions must be reported to SWCAA as soon as possible after discovery. Outside of normal business hours, upset conditions may be reported by email, fax, or leaving a telephone message with SWCAA.	Facility-wide

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
20.	<p>An annual emissions inventory report must be submitted to SWCAA by March 15 for emissions from the previous calendar year in accordance with SWCAA 400-105(1). Each report must contain, at a minimum, the following information:</p> <ul style="list-style-type: none"> <li>(a) The annual sum of emissions of NO<sub>x</sub>, CO, VOC, PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, TAPs, and HAPs;</li> <li>(b) The quantity of concrete produced (cubic yards);</li> <li>(c) The quantity of propane burned in the boiler; and</li> <li>(d) The total miles driven on plant haul roads by type of haul road (paved or unpaved).</li> </ul>	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.

<b>Req. No.</b>	<b>General Provisions</b>
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.