

April 5, 2023

Mr. Jason Fender  
TFT Construction, Inc.  
53990 West Lane Road  
Scappoose, OR 97056

RE: Final Air Discharge Permit / Nonroad Engine Permit for New Rock Crushing Equipment

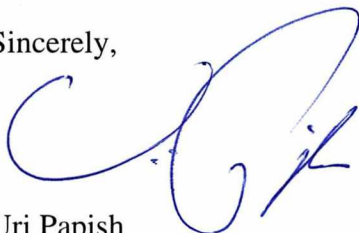
Dear Mr. Fender:

A final determination to issue Air Discharge Permit / Nonroad Engine Permit (ADP/NEP) 23-3575 has been completed for ADP/NEP Application CL-3225 pursuant to Sections 400-046(4) and 400-110(4) of the General Regulations for Air Pollution Sources of the Southwest Clean Air Agency (SWCAA). Public notice for ADP/NEP Application CL-3225 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 23-3575 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 23-3575 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 comments, or desire additional information, please contact me or Vanessa McClelland at (360) 574-3058, extension 129.

Sincerely,



Uri Papish  
Executive Director

UP:vm

Enclosure: Technical Support Document and Air Discharge Permit 23-3575






**AIR DISCHARGE PERMIT / NONROAD ENGINE PERMIT  
23-3575**


**Issued: April 5, 2023**

**TFT Construction, Inc.  
Portable**

**SWCAA ID – 2376**



REVIEWED BY:   
Clinton Lamoreaux, Chief Engineer

APPROVED BY:   
Uri Papish, Executive Director

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Appendix A – Emission Testing Requirements

**1. Equipment/Activity Identification**

<b>ID No.</b>	<b>Equipment/Activity</b>	<b>Control Equipment/Measure</b>
1	KPI-JCI FT4250CC Impact Crusher	High pressure wet suppression at crusher entrance
2	KPI-JCI FT4250CC Impact Crusher Engine (Caterpillar C13, 440 hp, nonroad engine)	Ultra-low sulfur diesel, EPA Tier 4 Certification
3	Haul Roads	Wet suppression as necessary

**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.

This ADP/NEP supersedes ADP/NEP 11-2969 in its entirety.

**Emission Limits**

<b>Req. No.</b>	<b>Emission Limits</b>	<b>Equipment/ Activity ID No.</b>								
1.	<p>Emissions from crushing and screening operations (blasting, crushing, screening, and haul roads) must not exceed:</p> <table border="0" style="margin-left: 40px;"> <tr> <td><u>Pollutant</u></td> <td><u>Emission Limit</u></td> </tr> <tr> <td>PM</td> <td>4.04 tons per year</td> </tr> <tr> <td>PM<sub>10</sub></td> <td>1.10 tons per year</td> </tr> <tr> <td>PM<sub>2.5</sub></td> <td>0.17 tons per year</td> </tr> </table> <p>Annual emissions must be calculated from actual material throughput and handling consistent with the methodology in Section 6 of the Technical Support Document (TSD) for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM	4.04 tons per year	PM <sub>10</sub>	1.10 tons per year	PM <sub>2.5</sub>	0.17 tons per year	1, 3
<u>Pollutant</u>	<u>Emission Limit</u>									
PM	4.04 tons per year									
PM <sub>10</sub>	1.10 tons per year									
PM <sub>2.5</sub>	0.17 tons per year									
2.	<p>Visible emissions from crushing, screening, and conveying equipment must not exceed zero percent (0%) opacity for more than three (3) minutes in any one-hour period, as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).</p>	1								

<b>Req. No.</b>	<b>Emission Limits</b>	<b>Equipment/ Activity ID No.</b>
3.	<p>Visible emissions from the diesel engine operating in support of crushing and handling operations must not exceed five percent (5%) opacity for more than three (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"> <li>(a) The engine has reached normal operating temperature; or</li> <li>(b) The engine has been operating for 15 minutes.</li> </ul>	2
4.	Visible emissions from haul roads must not exceed ten percent (10%) opacity for more than three (3) minutes in any one-hour period, as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).	3

### **Operating Limits and Requirements**

<b>Req. No.</b>	<b>Operating Limits and Requirements</b>	<b>Equipment/ Activity ID No.</b>
5.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
6.	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
7.	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.	Facility-wide
8.	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, 3
9.	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.	1, 3
10.	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, 2

<b>Req. No.</b>	<b>Operating Limits and Requirements</b>	<b>Equipment/ Activity ID No.</b>
11.	The rock crusher must be equipped with a high-pressure water spray system or other wet suppression system reviewed and approved 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
12.	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
13.	Spray/fog nozzles in the water spray systems for the crusher 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. Inspections are not required in any week the crusher is not operated.	1
14.	Additional wet suppression must be provided as necessary to control fugitive dust from haul roads, crushing, and material handling equipment in the event that process changes or weather patterns result in insufficient water application to control fugitive dust from plant operations.	1, 3
15.	The diesel engine must only be fired on #2 diesel or better. The sulfur content of the fuel fired in engine must not exceed 0.0015% by weight (15 ppm). 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.	2
16.	A nonresettable time totalizer must be installed on the crusher engine and used to measure the number of hours the engine operates.	2

### **Monitoring and Recordkeeping Requirements**

<b>Req. No.</b>	<b>Monitoring and Recordkeeping Requirements</b>	<b>Equipment/ Activity ID No.</b>
17.	With the exception of data logged by a computerized data acquisition system, each record required by this Air Discharge Permit shall include the date and the name of the person making the record entry.	Facility-wide
18.	All records required by this Air Discharge Permit 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
19.	Excess emissions and upset conditions must be recorded for each occurrence.	Facility-wide

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
20.	<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) Quantity and size of material throughput</li> <li>(b) Hours of engine operation</li> <li>(c) Visual inspection of spray/fog nozzles</li> <li>(d) Maintenance of spray/fog nozzles</li> <li>(e) Date and location of equipment relocation</li> <li>(f) Air quality related complaints</li> <li>(g) Fuel sulfur content of diesel engine fuel</li> </ul>	1-3

#### Emission Monitoring and Testing Requirements

Req. No.	Emission Monitoring and Testing Requirements	Equipment/ Activity ID No.
21.	<p>The Permittee must conduct initial emission testing of all rock crushing equipment listed in this ADP subject to Subpart OOO that has not been previously tested. Emissions testing must be conducted within 60 days after permit issuance pursuant to Appendix A of this ADP and the requirements of 40 CFR 60, Subpart OOO "Standards of Performance for Nonmetallic Mineral Processing Plants."</p>	1

#### Reporting Requirements

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
22.	<p>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.</p>	Facility-wide
23.	<p>Excess emissions must be reported to SWCAA as follows:</p> <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

<b>Req. No.</b>	<b>Reporting Requirements</b>	<b>Equipment/ Activity ID No.</b>
24.	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
25.	All air quality related complaints received by the Permittee regarding activities controlled by the Permittee must be reported to SWCAA within three 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
26.	The following emission-related information must be reported to SWCAA by March 15 <sup>th</sup> for the previous calendar year: <ul style="list-style-type: none"> <li>(a) Quantity and size of material crushed at each worksite;</li> <li>(b) Average length of unpaved haul road controlled by the Permittee at each worksite;</li> <li>(c) Hours of engine operation for the diesel engine used in support of crushing operations at each worksite; and</li> <li>(d) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs).</li> </ul>	1 - 3
27.	The results of source emissions testing conducted in accordance with Appendix A must be reported to SWCAA within 45 days of test completion.	1

### 3. General Provisions

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



<b>Req. No.</b>	<b>General Provisions</b>
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 Crushers / Aggregate Screens**

#### **1. Introduction:**

- (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 OOO "Standards of Performance for Nonmetallic Mineral Processing Plants."
- (b) An initial emissions test must be conducted for all rock crushing equipment listed in this permit subject to Subpart OOO that has not been previously tested pursuant to 40 CFR 60.8 and 60.675. 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 conveyor which has not previously been tested 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) A comprehensive test plan must be submitted to SWCAA for review and approval a minimum of ten business days prior to testing.
- (d) 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.
- (e) A minimum of 30 minutes of observations must be conducted as required by 40 CFR 60.675(c)(3).
- (f) 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. Testing Requirements:**

- |   |                     |
|---|---------------------|
| (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 Crushers / Aggregate Screens**

**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 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 observer and the equipment being tested;
  - (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. Average opacity must be reported in accordance with EPA Method 9, as well as the number of readings in excess of the permit limit in accordance with SWCAA Method 9.
  - (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.

**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.