



TECHNICAL SUPPORT DOCUMENT

**Air Discharge Permit ADP 24-3632
Air Discharge Permit Application CO-1089**

Issued: February 14, 2024

Longview School District - RA Long High School

SWCAA ID - 632

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TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
1. Facility Identification	1
2. Facility Description	1
3. Current Permitting Action	1
4. Process Description	1
5. Equipment/Activity Identification	2
6. Emissions Determination	3
7. Regulations and Emission Standards	5
8. RACT/BACT/BART/LAER/PSD/CAM Determinations	6
9. Ambient Impact Analysis	7
10. Discussion of Approval Conditions	7
11. Start-up and Shutdown Provisions/Alternative Operating Scenarios/Pollution Prevention	8
12. Emission Monitoring and Testing	8
13. Facility History	9
14. Public Involvement Opportunity	9

ABBREVIATIONS*List of Acronyms*

ADP	Air Discharge Permit	NOV	Notice of Violation/
AP-42	Compilation of Emission Factors, AP-42, 5th Edition, Volume 1, Stationary Point and Area Sources – published by EPA	PSD	Prevention of Significant Deterioration
ASIL	Acceptable Source Impact Level	RCW	Revised Code of Washington
BACT	Best available control technology	SCC	Source Classification Code
CAM	Compliance Assurance Monitoring	SDS	Safety Data Sheet
CAS#	Chemical Abstracts Service registry number	SQER	Small Quantity Emission Rate listed in WAC 173-460
CFR	Code of Federal Regulations	Standard	Standard conditions at a temperature of 68°F (20°C) and a pressure of 29.92 in Hg (760 mm Hg)
EPA	U.S. Environmental Protection Agency	SWCAA	Southwest Clean Air Agency
EU	Emission Unit	T-BACT	Best Available Control Technology for toxic air pollutants
mfr	Manufacturer	WAC	Washington Administrative Code

List of Units and Measures

acfm	Actual cubic foot per minute	ppmv	Parts per million by volume
dscfm	Dry Standard cubic foot per minute	ppmvd	Parts per million by volume, dry
gr/dscf	Grain per dry standard cubic foot	ppmw	Parts per million by weight
MMBtu	Million British thermal unit	scfm	Standard cubic foot per minute
MMcf	Million cubic feet	tpy	Tons per year
ppm	Parts per million		

List of Chemical Symbols, Formulas, and Pollutants

CO	Carbon monoxide	PM ₁₀	PM with an aerodynamic diameter 10 µm or less
CO ₂	Carbon dioxide	PM _{2.5}	PM with an aerodynamic diameter 2.5 µm or less
CO _{2e}	Carbon dioxide equivalent	SO ₂	Sulfur dioxide
HAP	Hazardous air pollutant listed pursuant to Section 112 of the Federal Clean Air Act	SO _x	Sulfur oxides
NO _x	Nitrogen oxides	TAP	Toxic air pollutant pursuant to Chapter 173-460 WAC
O ₂	Oxygen	VOC	Volatile organic compound
O ₃	Ozone		
PM	Particulate Matter with an aerodynamic diameter 100 µm or less		

Terms not otherwise defined have the meaning assigned to them in the referenced regulations or the dictionary definition, as appropriate.

1. FACILITY IDENTIFICATION

Applicant Name: Longview School District #122
 Applicant Address: 2080 38th Avenue, Longview, Washington 98632

Facility Name: R.A. Long High School
 Facility Address: 2715 Hudson Street, Longview, Washington 98632

SWCAA Identification: 632

Contact Person: Scott Palmer, Project Manager (*APEX Mechancial*)
 Jason Reetz, Facilities Manager (*Longview School District*)

Primary Process: Elementary and Secondary Schools
 SIC/NAICS Code: 8211 / Elementary and Secondary Schools
 61111 / Elementary and Secondary Schools

Facility Classification: Natural Minor

2. FACILITY DESCRIPTION

Longview School District #122 (LSD) is the public primary education provider for Longview, Washington. LSD operates sixteen (16) separate facilities. This permitting action affects the R.A. Long High School campus.

3. CURRENT PERMITTING ACTION

This permitting action is in response to Air Discharge Permit application number CO-1089 (ADP Application CO-1089) dated December 20, 2023. LSD submitted ADP Application CO-1089 requesting approval of the following:

- Replacement of an existing Burnham model E30 steam boiler with a new Smith model G19HE-S-8 steam boiler.

The current permitting action provides approval for installation of a replacement space heating boiler as proposed in ADP Application CO-1089.

ADP 24-3632 will supersede ADP 84-732, SUN 074, and SUN 075 in their entirety.

4. PROCESS DESCRIPTION

4.a. Space Heating. Multiple package boilers are used to provide hot water to hydronic space heating systems at the school campus. The boilers will typically operate less than one quarter of the year.

4.b. Domestic Hot Water. Multiple water heaters are used to provide domestic hot water at the school campus.

5. EQUIPMENT/ACTIVITY IDENTIFICATION

- 5.a. Water Heaters/Boilers (existing). Multiple natural gas fired water heaters and boilers used to supply domestic hot water at various locations on the school campus. Individual units are described as follows:

<u>Make / Model</u>	<u>Rated Heat Input</u>
AO Smith BTR 197 (s/n MC011019503)	0.199 MMBtu/hr
AO Smith BTH 400 (s/n 1506M001838)	0.399 MMBtu/hr
AO Smith BTH 400 (s/n 1507M000971)	0.399 MMBtu/hr
AO Smith BTR 197 (s/n D06M001230)	0.199 MMBtu/hr
AO Smith BC-670-690 (s/n B740088)	0.67 MMBtu/hr
AO Smith BC-670-690 (s/n F740037)	0.67 MMBtu/hr

- 5.b. Space Heating Boilers - Aerco (existing). Two hot water boilers used as needed to supply hot water for a hydronic space heating system. Each boiler is described as follows:

Boiler Make / Model:	Aerco / BMK2000 (s/n G-14-1690, s/n G-14-1692)
Year of Manufacture:	2014
Heat Input Rating:	2.0 MMBtu/hr (each)
Fuel:	Natural Gas
Emissions:	30 ppmv NO _x / 50 ppmv CO – corrected to 3% O ₂
Exhaust Stack:	8" diameter at 25' above ground level
Location:	46°08'25.86"N 122°57'23.56"W (G-14-1690) 46°08'25.85"N 122°57'23.41"W (G-14-1692)

- 5.c. Steam Boiler – Smith (new). One hot water boiler used as needed to supply steam to the central kitchen. The boiler is described as follows:

Boiler Make / Model:	Smith / G19HE-S-8 (s/n 222730)
Burner Make/Model:	Powerflame / JR50A-15HBS-8 (s/n 042289238)
Emissions Guarantee:	75 ppmv NO _x / 50 ppmv CO, @ 3% O ₂
Year of Manufacture:	2023
Heat Input Rating:	1.342 MMBtu/hr
Fuel:	Natural Gas
Exhaust Stack:	10" diameter vertical at 18' above ground level
Location:	46°08'24.07"N 122°57'27.04"W

- 5.d. Equipment/Activity Summary.

ID No.	Equipment/Activity	Control Equipment/Measure
1	Water Heaters (7.878 MMBtu/hr, combined)	Low Sulfur Fuel (Nat Gas)
2	Space Heating Boilers (Aerco - 4.0 MMBtu/hr, combined)	Low NO _x Burner, Low Sulfur Fuel (Nat Gas)
3	Steam Boiler (Smith - 1.342 MMBtu/hr)	Low Sulfur Fuel (Nat Gas)

6. EMISSIONS DETERMINATION

Emissions to the ambient atmosphere from the equipment proposed in ADP Application CO-1089 consist of nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), particulate matter (PM), sulfur dioxide (SO₂), toxic air pollutants (TAPs), and hazardous air pollutants (HAPs).

Unless otherwise specified by SWCAA, actual emissions must be determined using the specified input parameter listed for each emission unit and the following hierarchy of methodologies:

- (a) Continuous emissions monitoring system (CEMS) data;
 - (b) Source emissions test data (EPA reference method). When source emissions test data conflicts with CEMS data for the time period of a source test, source test data must be used;
 - (c) Source emissions test data (other test method); and
 - (d) Emission factors or methodology provided in this TSD.
- 6.a. Water Heaters (existing). Potential emissions from water heater operation are calculated from a combined heat input of 2,536 MMBtu/hr, 8,760 hr/yr, and emission factors from EPA AP-42 §1.4 "Natural Gas Combustion" (7/98). All PM is assumed to be PM_{2.5}. Annual emissions will be calculated based on actual fuel consumption using the same methodology.

Heat Input Rating =	2,536	MMBtu/hr		
Gas Heat Content =	1,020	Btu/scf		
Fuel Consumption =	22,215	MMBtu/yr		
	Emission Factor		Emissions	
Pollutant	(lb/MMBtu)	(lb/hr)	(lb/yr)	(tpy)
NO _x	0.0980	0.249	2,177	1.089
CO	0.0824	0.209	1,831	0.915
VOC	0.0054	0.014	120	0.060
SO _x as SO ₂	5.88E-04	1.5E-03	13	0.0065
PM (total)	0.0075	0.019	166	0.083
PM ₁₀	0.0075	0.019	166	0.083
PM _{2.5}	0.0075	0.019	166	0.083
Benzene	2.06E-06	5.2E-06	4.6E-02	2.3E-05
Formaldehyde	7.35E-05	1.9E-04	1.6E+00	8.2E-04
CO ₂ e	117.01	296.7	2,599,419	1299.7

- 6.b. Space Heating Boilers - Aerco (existing). Potential emissions from boiler operation are calculated from a combined heat input of 4.0 MMBtu/hr, 8,760 hr/yr, and applicable emission factors. Emission factors for NO_x and CO correspond to 30 ppmv and 50 ppmv at 3% O₂, respectively. All other emission factors are taken from EPA AP-42 §1.4 "Natural Gas Combustion" (7/98). All PM is assumed to be PM_{2.5}. Annual emissions will be calculated based on actual fuel consumption using the same methodology.

Heat Input Rating =	4.000	MMBtu/hr		
Gas Heat Content =	1,020	Btu/scf		
Fuel Consumption =	35,040	MMBtu/yr		
	Emission Factor		Emissions	
Pollutant	(lb/MMBtu)	(lb/hr)	(lb/yr)	(tpy)
NO _x	0.0360	0.144	1,261	0.631
CO	0.0370	0.148	1,296	0.648
VOC	0.0054	0.022	189	0.094
SO _x as SO ₂	5.88E-04	2.4E-03	21	0.010
PM (total)	0.0075	0.030	261	0.131
PM ₁₀	0.0075	0.030	261	0.131
PM _{2.5}	0.0075	0.030	261	0.131
Benzene	2.06E-06	8.2E-06	7.2E-02	3.6E-05
Formaldehyde	7.35E-05	2.9E-04	2.6E+00	1.3E-03
CO ₂ e	117.01	468.0	4,100,030	2050.0

- 6.c. Steam Boiler - Smith (replacement). Potential emissions from boiler operation are calculated from a rated heat input of 1.342 MMBtu/hr, 8,760 hr/yr, and applicable emission factors. Emission factors for NO_x and CO correspond to 75 ppmv and 50 ppmv at 3% O₂, respectively. All other emission factors are taken from EPA AP-42 §1.4 "Natural Gas Combustion" (7/98). All PM is assumed to be PM_{2.5}. Annual emissions will be calculated based on actual fuel consumption using the same methodology.

Heat Input Rating =	1.342	MMBtu/hr		
Gas Heat Content =	1,020	Btu/scf		
Fuel Consumption =	11,756	MMBtu/yr		
	Emission Factor		Emissions	
Pollutant	(lb/MMBtu)	(lb/hr)	(lb/yr)	(tpy)
NO _x	0.0911	0.122	1,071	0.5355
CO	0.0369	0.050	434	0.2169
VOC	0.0054	0.0072	63	0.0317
SO _x as SO ₂	5.88E-04	7.9E-04	7	0.0035
PM (total)	0.0075	0.010	88	0.0438
PM ₁₀	0.0075	0.010	88	0.0438
PM _{2.5}	0.0075	0.010	88	0.0438
Benzene	2.06E-06	2.8E-06	2.4E-02	1.2E-05
Formaldehyde	7.35E-05	9.9E-05	8.6E-01	4.3E-04
CO ₂ e	117.01	157.0	1,375,560	687.8

ADP Application CO-1089. LSD proposes to replace an existing Burnham E30 natural gas fired hot water boiler at the school's central kitchen with a new Smith G19HE boiler of similar capacity and configuration. No other changes will be made to facility equipment.

- 6.d. Emissions Summary/Facility-wide Potential to Emit. Facility-wide potential to emit from emission units at the R.A. Long High School campus as calculated in the sections above is summarized below.

<u>Pollutant</u>	<u>Potential Emissions (tpy)</u>	<u>Project Increase (tpy)</u>
NO _x	2.255	2.255
CO	1.778	1.778
VOC	0.186	0.186
SO ₂	0.020	0.020
Lead	0.00	0.00
PM	0.26	0.26
PM ₁₀	0.26	0.26
PM _{2.5}	0.26	0.26
TAP	0.0026	0.0026
HAP	0.0026	0.0026
CO _{2e}	4,038	4,038

<u>Pollutant</u>	<u>CAS Number</u>	<u>Category</u>	<u>Facility-wide Emissions</u>	<u>Project Increase</u>	<u>WAC 173-460 SQER</u>
			<u>lb/yr</u>	<u>lb/yr</u>	<u>lb/yr</u>
Benzene	71-43-2	HAP/TAP	0.14	0.024	20
Formaldehyde	50-00-0	HAP/TAP	5.07	0.864	20

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. 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 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.b. 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 Air Discharge Permit for installation and establishment of an air contaminant source.
- 7.c. WAC 173-460 "Controls for New Sources of Toxic Air Pollutants" 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.d. WAC 173-476 "Ambient Air Quality Standards" establishes ambient air quality standards for PM₁₀, PM_{2.5}, lead, sulfur dioxide, nitrogen dioxide, ozone, and carbon monoxide in the ambient air, which shall not be exceeded.
- 7.e. 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.f. 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.g. SWCAA 400-060 "Emission Standards for General Process Units" prohibits particulate matter emissions from all new and existing process units in excess of 0.1 grains per dry standard cubic foot of exhaust gas.
- 7.h. SWCAA 400-070(13) " General Requirements for Certain Source Categories: Natural Gas-Fired Water Heaters."
- (a) Applicability. The requirements of this section apply to all natural gas-fired water heaters with a rated heat input less than 400,000 Btu/hr. For the purposes of this subsection, the term "water heater" means a closed vessel in which water is heated by combustion of gaseous fuel and is withdrawn for use external to the vessel at pressures not exceeding 160 psig, including the apparatus by which heat is generated and all controls and devices necessary to prevent water temperatures from exceeding 210°F.
 - (b) Requirements.
 - (i) On or after January 1, 2010, no person shall offer for sale, or install, a water heater that emits NO_x at levels in excess of 55 ppmv at 3% O₂, dry (0.067 lb per million Btu of heat input).
 - (ii) On or after January 1, 2013, no person shall offer for sale, or install, a water heater that emits NO_x at levels in excess of 20 ppmv at 3% O₂, dry (0.024 lb per million Btu of heat input).
- 7.i. SWCAA 400-109 "Air Discharge Permit Applications" requires that an Air Discharge Permit 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 Air Discharge Permit application to request such changes. An Air Discharge Permit 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.j. SWCAA 400-110 "New Source Review" requires that SWCAA issue an Air Discharge Permit in response to an Air Discharge Permit application prior to establishment of the new source, emission unit, or modification.
- 7.k. SWCAA 400-113 "Requirements for New Sources in Attainment or Nonclassifiable Areas" 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) Best Available Control Technology will be employed for all air contaminants to be emitted by the proposed equipment;
 - (3) The proposed equipment will not cause any ambient air quality standard to be exceeded; and
 - (4) 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.

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

The proposed equipment and control systems incorporate Best Available Control Technology (BACT) for the types and amounts of air contaminants emitted by the processes as described below:

New BACT Determinations

- 8.a. BACT Determination – Steam Boiler. The proposed use of low sulfur fuel (natural gas), annual emission monitoring, and proper combustion controls has been determined to meet the requirements of BACT for the new steam boiler at this facility.

Other Determinations

- 8.b. Prevention of Significant Deterioration (PSD) Applicability Determination. The potential to emit of this facility is less than applicable PSD applicability thresholds. Likewise, this permitting action will not result in a potential increase in emissions equal to or greater than the PSD thresholds. Therefore, PSD review is not applicable to this action.
- 8.c. Compliance Assurance Monitoring (CAM) Applicability Determination. CAM is not applicable to any emission unit at this facility because it is not a major source and is not required to obtain a Part 70 permit.

9. AMBIENT IMPACT ANALYSIS

- 9.a. TAP Small Quantity Review. The incremental increases in TAP emissions associated with this permitting action 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.

Conclusions

- 9.b. Installation of a replacement space heating boiler, as proposed in ADP Application CO-1089, will not cause the ambient air quality requirements of Title 40 Code of Federal Regulations (CFR) Part 50 "National Primary and Secondary Ambient Air Quality Standards" to be violated.
- 9.c. Installation of a replacement space heating boiler, as proposed in ADP Application CO-1089, will not cause the requirements of WAC 173-460 "Controls for New Sources of Toxic Air Pollutants" or WAC 173-476 "Ambient Air Quality Standards" to be violated.
- 9.d. Installation of a replacement space heating boiler, as proposed in ADP Application CO-1089, 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 24-3632 in response to ADP Application CO-1089. ADP 24-3632 contains approval requirements deemed necessary to assure compliance with applicable regulations and emission standards as discussed below.

- 10.a. Supersession of Previous Permits. ADP 24-3632 supersedes ADP 84-732, SUN 074, and SUN 075 in their entirety.
- 10.b. General Basis. Permit requirements for equipment affected by this permitting action incorporate the operating schemes proposed by the applicant in ADP Application CO-1089. Permit requirements established by this action are intended to implement BACT, minimize emissions, and assure compliance with applicable requirements on a continuous basis. Emission limits for approved equipment are based on the maximum potential emissions calculated in Section 6 of this Technical Support Document.
- 10.c. Monitoring and Recordkeeping Requirements. ADP 24-3632 establishes monitoring and recordkeeping requirements sufficient to document compliance with applicable emission limits, ensure proper operation of approved equipment and provide for compliance with generally applicable requirements. Specific monitoring requirements are established for fuel consumption.

- 10.d. Reporting Requirements. ADP 24-3632 establishes general reporting requirements for annual air emissions, upset conditions and excess emissions. Specific reporting requirements are established for fuel consumption. Reports are to be submitted on an annual basis.
- 10.e. Space Heating Boilers. Permit requirements for the Aerco space heating boilers listed in this application incorporate expected operational performance and the operating schemes proposed by the permit applicant at the time of installation. The boilers are low emission models. Emission concentrations of NO_x and CO have been limited to those levels guaranteed by the manufacturer. Visible emissions from the boilers are limited to 0% opacity consistent with proper operation. Annual emission monitoring requirements have been established to assure proper operation on an ongoing basis. Although the space heating boilers will only operate in specific heating load conditions, annual hours of operation have not been restricted.
- 10.f. Steam Boiler - Smith. Permit requirements for the steam boiler listed in this application incorporate expected operational performance and the operating schemes proposed by the permit applicant at the time of installation. The steam boiler is equipped with a standard burner design, and emission concentrations of NO_x and CO have been limited to those levels guaranteed by the manufacturer. A standard burner was accepted as BACT because normal use of the steam boiler is limited and intermittent. Visible emissions from the steam boiler are limited to 0% opacity consistent with proper operation. Annual emission monitoring requirements have been established to assure proper operation on an ongoing basis.
- 10.g. Requirements for Unmodified Emission Units. Permit requirements for existing emission units not affected by ADP Application CO-1089 are carried forward unchanged from ADP 84-732.

11. START-UP AND SHUTDOWN/ALTERNATIVE OPERATING SCENARIOS/POLLUTION PREVENTION

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

The applicant did not identify any start-up and shutdown periods during which affected equipment is not capable of achieving continuous compliance with applicable technology determinations or approval conditions. To SWCAA's knowledge, this facility can comply with all applicable standards during startup and shutdown.

- 11.b. Alternate Operating Scenarios. SWCAA conducted a review of alternate operating scenarios applicable to equipment affected by this permitting action. The permittee did not propose or identify any applicable alternate operating scenarios. Therefore, none were included in the permit requirements.
- 11.c. Pollution Prevention Measures. SWCAA conducted a review of possible pollution prevention measures for the facility. No pollution prevention measures were identified by either the permittee or SWCAA separate or in addition to those measures required under BACT considerations. Therefore, none were included in the permit requirements.

12. EMISSION MONITORING AND TESTING

- 12.a. Emission Monitoring – Space Heating Boilers. Emission monitoring of each space heating boiler is required on a continuing 12-month cycle. All emission monitoring shall be conducted in accordance with ADP 24-3632, Appendix A.

13. FACILITY HISTORY

13.a. Previous Permitting Actions. SWCAA has previously issued the following Permits for this facility:

<u>Permit Number</u>	<u>Application Number</u>	<u>Date</u>	<u>Purpose</u>
SUN 075	--	1/9/2015	Installation of a replacement natural gas fired boiler at RA Long High School. AERCO BMK 2000, S/N G-14-1692, 2.0 MMBtu/hr.
SUN 074	--	1/9/2015	Installation of a replacement natural gas fired boiler at RA Long High School. AERCO BMK 2000, S/N G-14-1690, 2.0 MMBtu/hr.
84-732	CO-293	3/15/1984	Installation of three space heating boilers, a spray booth, and a sawdust collection system as part of a campus modernization project.

13.b. Compliance History. A search of source records on file at SWCAA identified the following compliance issues at this facility.

<u>Date</u>	<u>NOV Number</u>	<u>Violation</u>
1/17/2024	11064	Installation and operation of a regulated emission unit without first obtaining a permit and/or approval from SWCAA.

14. PUBLIC INVOLVEMENT OPPORTUNITY

14.a. Public Notice for ADP Application CO-1089. Public notice for ADP Application CO-1089 was published on the SWCAA internet website for a minimum of (15) days beginning on January 12, 2024.

14.b. Public/Applicant Comment for ADP Application CO-1089. SWCAA did not receive specific comments, a comment period request or any other inquiry from the public regarding this ADP application. Therefore no public comment period was provided for this permitting action.

14.c. State Environmental Policy Act. This project is exempt from SEPA requirements pursuant to WAC 197-11-800(3) since it only involves repair and/or maintenance of existing structures, equipment or facilities, and will not involve material expansions or changes in use. SWCAA issued a Determination of SEPA Exempt (SWCAA 24-009) concurrent with issuance of ADP 24-3632.