



November 4, 2024

Bryan Wigginton, Sr. Environmental Manager
Glacier Northwest, Inc.
1100 Third Street
Longview WA 98632

RE: Final Air Discharge Permit for Replacement of Bin Vent Filters

Dear Mr. Wigginton:

A final determination to issue Air Discharge Permit (ADP) 24-3668 has been completed for ADP application CO-1105 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-1105 was published in the permit section of SWCAA's website on September 25, 2024. 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 24-3668 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 24-3668 may be appealed directly to the Pollution Control Hearings Board (PCHB) 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 Vannessa McClelland at (360) 574-3058, extension 129.

Sincerely,

Uri Papish
Executive Director

UP:VM

Enclosures: Technical Support Document and Air Discharge Permit 24-3668





**AIR DISCHARGE PERMIT
24-3668**

Issued: November 4, 2024

Glacier Northwest, Inc. – Longview Ready Mix
1100 Third Street, Longview WA 98632

SWCAA ID – 348

REVIEWED BY:

Clinton Lamoreaux, Chief Engineer



APPROVED BY:

Uri Papish, Executive Director

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1. Equipment/Activity Identification

| ID No. | Equipment/Activity | Control Equipment/Measure |
|---------------|--|------------------------------------|
| 1 | Concrete Batch Plant | Dust Collector – C&W Mfg and Sales |
| 2 | Cement Storage Silo – 110 tons | Dust Collector – C&W Mfg and Sales |
| 3 | Cement Storage Silo – 200 tons | Dust Collector – C&W Mfg and Sales |
| 4 | Slag Storage Silo – 75 tons | Dust Collector – C&W Mfg and Sales |
| 5 | Cement/Fly Ash/Slag Weigh Hopper | Dust Collector – C&W Mfg and Sales |
| 6 | Storage Piles and Haul Roads | Low-Pressure Wet Suppression |
| 7 | Rockmills Steel Corp. Hot Water Heater | Ultra Low-Sulfur Diesel |

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 24-3668 supersedes ADP 20-3402 in its entirety.

Emission Limits

| Req. No. | Emission Limits | Equipment/Activity ID No. | | | | | | | | |
|-------------------|--|----------------------------------|-----------------------|----|----------|------------------|----------|-------------------|----------|-----|
| 1. | <p>Emissions from concrete batch plant and haul road operations must not exceed:</p> <table border="1"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>PM</td> <td>4.75 tpy</td> </tr> <tr> <td>PM₁₀</td> <td>1.43 tpy</td> </tr> <tr> <td>PM_{2.5}</td> <td>1.04 tpy</td> </tr> </tbody> </table> <p>Emissions must be determined consistent with Section 6 of the Technical Support Document (TSD) for this ADP.</p> | <u>Pollutant</u> | <u>Emission Limit</u> | PM | 4.75 tpy | PM ₁₀ | 1.43 tpy | PM _{2.5} | 1.04 tpy | 1–6 |
| <u>Pollutant</u> | <u>Emission Limit</u> | | | | | | | | | |
| PM | 4.75 tpy | | | | | | | | | |
| PM ₁₀ | 1.43 tpy | | | | | | | | | |
| PM _{2.5} | 1.04 tpy | | | | | | | | | |
| 2. | Emissions of particulate matter from each of the dust collectors must not exceed 0.005 gr/dscf (1-hour average). | 1–5 | | | | | | | | |

| Req. No. | Emission Limits | Equipment/ Activity ID No. | | | | | | |
|------------------|---|-----------------------------------|-----------------------|-----------------|--|----|--|---|
| 3. | <p>Emissions from the operation of the hot water heater must not exceed:</p> <table border="0"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>NO_x</td> <td>2.17 tpy; 70 ppm at 7% O₂, 1-hr avg</td> </tr> <tr> <td>CO</td> <td>0.47 tpy; 25 ppm at 7% O₂, 1-hr avg</td> </tr> </tbody> </table> <p>Emissions shall be determined consistent with Appendix A of this ADP and Section 6 of the TSD for this ADP.</p> | <u>Pollutant</u> | <u>Emission Limit</u> | NO _x | 2.17 tpy; 70 ppm at 7% O ₂ , 1-hr avg | CO | 0.47 tpy; 25 ppm at 7% O ₂ , 1-hr avg | 7 |
| <u>Pollutant</u> | <u>Emission Limit</u> | | | | | | | |
| NO _x | 2.17 tpy; 70 ppm at 7% O ₂ , 1-hr avg | | | | | | | |
| CO | 0.47 tpy; 25 ppm at 7% O ₂ , 1-hr avg | | | | | | | |
| 4. | Visible emissions from the concrete batch plant, storage piles, and haul roads must not exceed zero (0) percent opacity for more than three minutes in any one-hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400). | 1-6 | | | | | | |
| 5. | Visible emissions from the diesel-fired hot water heater must not exceed five (5) percent opacity for more than three minutes in any one-hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400). | 7 | | | | | | |

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. | 1-7 |
| 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. | 1-7 |
| 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. | Concrete production must not exceed 120,000 yd ³ /yr. | 1-5 |
| 11. | All material storage piles and haul roads shall be watered as necessary to minimize fugitive dust emissions. | Facility-wide |

| Req. No. | Operating Limits and Requirements | Equipment/ Activity ID No. |
|-----------------|--|-----------------------------------|
| 12. | Water suppression systems shall 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. | Facility-wide |
| 13. | A pressure gauge capable of continuously monitoring pressure must be installed and maintained for the C&W Manufacturing and Sales Co dust collector on the concrete batch plant. | 1 |
| 14. | A sufficient quantity of replacement filters, filter bags, or cartridges, as applicable, must be kept on site and readily available. Replacements of filters, filter bags, and cartridges must be performed at the manufacturer's specified intervals or more frequent, as necessary. | 1-5 |
| 15. | All deliveries of Portland cement and other powdered bulk materials (fly ash) must be made via enclosed pneumatic transfer. | 2-5 |
| 16. | The hot water heater must only be fired on #2 diesel or better. The sulfur content of the fuel fired in the hot water heater must not exceed 0.0015% by weight (15 ppm). A fuel certificate from the fuel supplier may be used to demonstrate compliance with this requirement. | 7 |
| 17. | If the test results from any performance monitoring event for the hot water heater indicate that emission concentrations may exceed 70 ppmvd NO _x @ 7% O ₂ or 25 ppmvd CO @ 7% O ₂ , the permittee must either perform 60 minutes of additional monitoring to more accurately quantify CO and NO _x emissions or initiate corrective action. Additional testing or corrective action must be initiated as soon as practical but no later than three days after the potential exceedance is identified. Corrective action includes tuning, maintenance by service personnel, limitation of heater load, or other action taken to maintain compliance with permitted limits. Monitoring of unit emissions must be conducted within three days following completion of any corrective action to confirm that the corrective action has been effective. Corrective action must be pursued until observed emission concentrations no longer exceed 70 ppmvd NO _x @ 7% O ₂ or 25 ppmvd CO @ 7% O ₂ . | 7 |
| 18. | The Permittee must notify SWCAA at least ten (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 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. | 1-7 |

| Req. No. | Operating Limits and Requirements | Equipment/ Activity ID No. |
|-----------------|--|-----------------------------------|
| 19. | The Permittee must notify all property owners immediately adjacent to a new job site a minimum of ten (10) business days in advance of the intended relocation. Such written notification must include a complete description of the proposed operation, the emissions control provisions and equipment, the total estimated project emissions, the name, address and phone number of the person in charge of the operation, and contact information for SWCAA. Responses from adjacent landowners must be directed to SWCAA. Authorized operations are dependent on the receipt of public response regarding the proposed relocation. | 1-7 |

Monitoring and Recordkeeping Requirements

| Req. No. | Monitoring and Recordkeeping Requirements | Equipment/ Activity ID No. |
|-----------------|---|-----------------------------------|
| 20. | Except for 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 |
| 21. | 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 |
| 22. | Excess emissions and upset conditions must be recorded for each occurrence. | Facility-wide |
| 23. | Operational data for the concrete batch plant must be recorded as follows: <ul style="list-style-type: none"> a. Concrete production must be recorded monthly; b. Miles of haul roads driven on which type of road (paved/unpaved) must be recorded annually; c. The differential pressure across filter media for the batch plant's C&W Manufacturing and Sales Co. dust collector (model CP 2250-3078) must be recorded weekly; d. Filter bag and cartridge replacement for each baghouse must be recorded for each occurrence; and e. Maintenance and repair activities must be recorded for each occurrence. | 1-6 |
| 24. | Operational data for the hot water heater must be recorded as follows: <ul style="list-style-type: none"> a. Fuel consumption must be recorded monthly; b. The fuel sulfur content of the diesel burned in the hot water heater must be determined and recorded for each fuel delivery. A fuel supplier certification may be used in lieu of actual fuel testing; c. Emission monitoring results recorded for each occurrence; and d. Maintenance and repair activities must be recorded for each occurrence. | 7 |

Emission Monitoring and Testing Requirements

| No. | Emission Monitoring and Testing Requirements | Equipment/ Activity ID No. |
|------------|--|---------------------------------------|
| 25. | The hot water heater must be emission monitored annually, no later than the end of September, in accordance with Appendix A. | 7 |

Reporting Requirements

| Req. No. | Reporting Requirements | Equipment/ Activity ID No. |
|---------------------|---|---------------------------------------|
| 26. | Upset conditions must be reported to SWCAA as soon as possible after discovery by phone call or phone message, email, or fax. It is the Permittee's responsibility to verify that the upset conditions information was received. | Facility-wide |
| 27. | Excess emissions must be reported to SWCAA as follows: 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 |
| 28. | Deviations from permit conditions must be reported as soon as possible but no later than 30 days after the end of the month during which the deviation is discovered. | Facility-wide |
| 29. | 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 |
| 30. | An annual emissions inventory report must be submitted to SWCAA by March 15th of each year for the previous calendar year in accordance with SWCAA 400-105(1). Each report must contain, at a minimum, the following information: a. The annual sum of emissions of criteria pollutants; b. The annual total concrete production (yd ³); c. The annual number of haul road miles driven and type of road; and d. The annual fuel consumed by the hot water heater. | 1-7 |
| 31. | Emission monitoring results must be reported to SWCAA in writing within fifteen (15) calendar days of completion. | 7 |

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. |
| K. | For the purposes of establishing if a condition of this ADP has been violated or is being violated, nothing in this ADP precludes the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test procedures or methods had been performed. |

Appendix A
Emission Monitoring Requirements
Rockmills Steel Corp. Hot Water Heater

1. Background

The purpose of emission monitoring ("tuning") is to quantify emissions from the hot water heater, provide a basis for adjust the hot water heater as necessary to minimize emissions, and to provide a reasonable assurance that the hot water heater is operating properly.

2. Test Constituents and Test Methods

- (a) Oxygen (O₂) using a calibrated portable combustion analyzer or EPA Methods 3 or 3A;
- (b) Nitrogen oxides (NO_x) using a calibrated portable combustion analyzer or EPA Method 7E; and
- (c) Carbon monoxide (CO) using a calibrated portable combustion analyzer or EPA Method 10.

Combustion analyzers include electrochemical cell combustion analyzers, analyzers used for reference method testing, or other analyzers pre-approved by SWCAA.

3. Monitoring Requirements

- (a) Dates. Emission monitoring must be conducted at least once within every twelve (12) month period no later than September 30, while firing on diesel, unless the unit is not in use during that year, or a reference method source testing was conducted on that unit during that year.
- (b) Source Operation. Unit operation during the emissions test must be representative of current intended operating conditions.
- (c) Data Collection.
 - (1) Sampling must consist of at least one (1) test consisting of at least five (5) minutes of data collection following a "ramp-up phase." The ramp-up phase ends when analyzer readings have stabilized (less than 5% per minute change in emission concentration). Emission concentrations must be recorded at least once every thirty (30) seconds during the data collection phase. All test data collected following the ramp-up phase must be reported to SWCAA.
 - (2) The analyzer(s) response to span gas of a known concentration must be determined before and after testing. No more than twelve (12) hours may elapse between span gas response checks. The results of the analyzer response will not be valid if the pre and post response check results vary by more than 10% of the known span gas value.
 - (3) The CO and NO_x span gas concentrations must be no less than 50% and no more than 200% of the emission concentration corresponding to the permitted emission limits. A lower concentration span gas may be used if it is more representative of measured concentrations. Ambient air may be used to zero the CO and NO_x cells/analyzer(s) and span the oxygen cell/analyzer.
 - (4) If the monitoring results from any monitoring event indicate that emission concentrations exceed the permitted emission limits for the unit, the Permittee must either perform sixty (60) minutes of additional monitoring to more accurately quantify CO and NO_x emissions or initiate corrective action. Additional

Appendix A
Emission Monitoring Requirements
Rockmills Steel Corp. Hot Water Heater

monitoring or corrective action must be initiated as soon as practical but no later than three (3) calendar days after the exceedance is identified. Corrective action includes tuning, maintenance by service personnel, limitation of unit load, or other action taken to maintain compliance with permitted limits. Monitoring of unit emissions must be conducted within three (3) calendar days following completion of any corrective action to confirm that the corrective action has been effective. Initiation of corrective action does not shield the Permittee from enforcement.

| NO _x (ppmvd @ 7% O ₂) | CO (ppmvd @ 7% O ₂) |
|---|------------------------------------|
| 70 | 25 |

4. Reporting Requirements

Monitoring results must be reported to SWCAA within fifteen (15) calendar days of monitoring completion. The average of the results of each run is evaluated against the requirements of ADP 24-3668. Results must be submitted on forms provided by SWCAA or in an alternative format previously approved by SWCAA. The report must include the following information:

- (a) A description of the emission unit, including manufacturer, model number and facility designation;
- (b) Time and date of the emissions evaluation;
- (c) Identification of the personnel involved;
- (d) Test "tapes" or other direct information generated by the monitoring equipment;
- (e) All collected data, calculations, and final results, reported in units consistent with the applicable emission standard or limit;
- (f) Final test result concentrations will be corrected to 3% O₂;
- (g) A summary of control system or equipment operating conditions;
- (h) A description of the evaluation methods or procedures used, including all field data, quality assurance/quality control procedures and documentation; and
- (i) Calibration error checks documentation.

5. Changes to Requirements

Emission monitoring 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 monitoring schedule. Upon review of the request and in accordance with EPA delegation, SWCAA will inform the Permittee in writing of any approved modifications.