



April 9, 2025

Randy Goecke  
3 Kings Environmental Inc.  
PO Box 280  
Battle Ground, WA 98604

RE: Final Air Discharge Permit / Nonroad Engine Permit for Rock Crushers and Associated Nonroad Combustion Equipment

Dear Randy Goecke:

A final determination to issue Air Discharge Permit (ADP) / Nonroad Engine Permit (NEP) 25-3698 has been completed for ADP/NEP Application CL-3266 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/NEP Application CL-3266 was published in the permit section of SWCAA's website on March 27, 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/NEP 25-3698 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/NEP 25-3698 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 Abraham Apfel at (360) 574-3058, extension 124.

Sincerely,

Uri Papish  
Executive Director

UP:AA

Enclosure: Technical Support Document and ADP/NEP 25-3698





**AIR DISCHARGE PERMIT  
25-3698**

**Issued: April 9, 2025**

**3 Kings Environmental Inc.**  
15001 NE 10<sup>th</sup> Ave Vancouver, WA 98685

**SWCAA ID – 2264**

REVIEWED BY:

Clinton Lamoreaux, Chief Engineer



APPROVED BY:

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	Terex-Pegson jaw crusher, Model XA400S, s/n: 400146EAXA	High Pressure Wet Suppression
2	Chieftain Powerscreen, Model 1400, s/n: 6620764	High Pressure Wet Suppression
3	Trakpactor Powerscreen, Model 320SR, s/n: PID320SRCOMN68905	High Pressure Wet Suppression
4	Nonroad Caterpillar Engine, C-9 ACERT, s/n: MBD02719	Ultra-low Sulfur Diesel EPA Tier 3 Certification
5	Nonroad Deutz Engine, BF4M 2012, s/n: 10225137	Ultra-low Sulfur Diesel EPA Tier 2 Certification
6	Nonroad Scania Engine, DC09 085A, s/n: 7359951	Ultra-low Sulfur Diesel EPA Tier 4 Certification
7	Haul Roads	Wet suppression

**2. Permit Requirements**

The following tables detail the specific requirements of this Air Discharge Permit (ADP) / Nonroad Engine Permit (NEP). 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/NEP 25-3698 supersedes ADP/NEP 08-2814 in its entirety.

**Emission Limits**

Emission Limits

Req. No.	Emission Limits	Equipment/ Activity ID No.								
1.	<p>Emissions from crushing and screening operations (blasting, crushing, screening, and haul roads) must not exceed:</p> <table><tr><th>Pollutant</th><th>Emission Limit</th></tr><tr><td>Particulate Matter, PM</td><td>4.07 tpy</td></tr><tr><td>Particulate Matter, PM<sub>10</sub></td><td>1.11 tpy</td></tr><tr><td>Particulate Matter, PM<sub>2.5</sub></td><td>0.17 tpy</td></tr></table> <p>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>	Pollutant	Emission Limit	Particulate Matter, PM	4.07 tpy	Particulate Matter, PM <sub>10</sub>	1.11 tpy	Particulate Matter, PM <sub>2.5</sub>	0.17 tpy	1-3, and 7
Pollutant	Emission Limit									
Particulate Matter, PM	4.07 tpy									
Particulate Matter, PM <sub>10</sub>	1.11 tpy									
Particulate Matter, PM <sub>2.5</sub>	0.17 tpy									

<b>Req. No.</b>	<b>Emission Limits</b>	<b>Equipment/ Activity ID No.</b>
2.	Visible emissions from the crushing and conveying equipment must not exceed zero percent (0%) opacity for more than three (3) minutes in any 1-hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).	1-3
3.	Visible emissions from haul roads must not exceed ten percent (10%) opacity for more than three (3) minutes in any 1-hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).	7
4.	<p>Visible emissions from the diesel engines operating in support of the crushing and handling operations must not exceed five percent (5%) opacity for more than three (3) minutes in any 1-hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400) except during start-up.</p> <p>For the purposes of this requirement, the start-up period ends when the earlier of the following operating events occurs:</p> <p>(a) The engine has reached normal operating temperature; or</p> <p>(b) The engine has been operating for 15 minutes.</p>	4-6

#### 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 ADP/NEP 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.	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.	Facility-wide
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, and 7

<b>Req. No.</b>	<b>Operating Limits and Requirements</b>	<b>Equipment/ Activity ID No.</b>
10.	The rock crushers and screens 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.	1-3
11.	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
12.	Spray/fog nozzles in the water spray systems for the crushers and screens 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 crushers or screens are not operated.	1-3, and 7
13.	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, and 7
14.	Each diesel engine's exhaust must be discharged vertically. Any device that obstructs or prevents vertical discharge is prohibited.	4-6
15.	A nonresettable time totalizer must be installed on the diesel engines and used to measure the number of hours of operation for each engine.	4-6
16.	The diesel engines 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. For Nonroad Scania Engine DC09 085A must use diesel exhaust fuel to achieve EPA Tier 4 status.	4-6
17.	Nonroad Scania Engine DC09 085A must use diesel exhaust fluid to achieve EPA Tier 4 status.	6

**Monitoring and Recordkeeping Requirements**

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.																																				
18.	With the exception of data logged by a computerized data acquisition system, each record required by this ADP/NEP 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																																				
19.	All records required by this ADP/NEP 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																																				
20.	Excess emissions and upset conditions must be recorded for each occurrence.	Facility-wide																																				
21.	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																																				
22.	<p>The following information must be collected, recorded at the intervals specified below, and maintained readily available on-site for inspection:</p> <table><tr><td>(a)</td><td>Hours of operation for each engine</td><td>Monthly</td></tr><tr><td>(b)</td><td>Quantity and size of material crushed</td><td>Monthly</td></tr><tr><td>(c)</td><td>Quantity of material screened</td><td>Monthly</td></tr><tr><td>(d)</td><td>Type and length of haul roads</td><td>Recorded for each location</td></tr><tr><td>(e)</td><td>Quantity of vehicle miles travelled</td><td>Recorded for each location</td></tr><tr><td>(f)</td><td>Visual inspection of spray/fog nozzles</td><td>Each occurrence</td></tr><tr><td>(g)</td><td>Maintenance of spray/fog nozzles</td><td>Each occurrence</td></tr><tr><td>(h)</td><td>Equipment relocation (unit, time, place)</td><td>Each occurrence</td></tr><tr><td>(i)</td><td>Air quality and odor complaints</td><td>Each occurrence</td></tr><tr><td>(j)</td><td>Sulfur content of fuel fired in diesel engines</td><td>Each delivery</td></tr><tr><td>(j)</td><td>Deisel exhaust fluid purchase</td><td>Each delivery</td></tr><tr><td>(j)</td><td>Calculated air emissions</td><td>Annually</td></tr></table>	(a)	Hours of operation for each engine	Monthly	(b)	Quantity and size of material crushed	Monthly	(c)	Quantity of material screened	Monthly	(d)	Type and length of haul roads	Recorded for each location	(e)	Quantity of vehicle miles travelled	Recorded for each location	(f)	Visual inspection of spray/fog nozzles	Each occurrence	(g)	Maintenance of spray/fog nozzles	Each occurrence	(h)	Equipment relocation (unit, time, place)	Each occurrence	(i)	Air quality and odor complaints	Each occurrence	(j)	Sulfur content of fuel fired in diesel engines	Each delivery	(j)	Deisel exhaust fluid purchase	Each delivery	(j)	Calculated air emissions	Annually	Facility-wide
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**Emission Monitoring and Testing Requirements**

<b>Req. No.</b>	<b>Emission Monitoring and Testing Requirements</b>	<b>Equipment/ Activity ID No.</b>
23.	An initial emission test must be conducted for all rock crushing equipment listed in this ADP/NEP 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.	3

**Reporting Requirements**

<b>Req. No.</b>	<b>Reporting Requirements</b>	<b>Equipment/ Activity ID No.</b>
24.	Upset conditions must be reported to SWCAA as soon as possible after discovery by phone call or phone message, or email. It is the permittee's responsibility to verify that the upset conditions information was received.	Facility-wide
25.	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
26.	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
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.	The following emission-related information must be reported to SWCAA by March 15 <sup>th</sup> for the previous calendar year: (a) Hours of operation for each engine; (b) Quantity and size of material crushed; (c) Quantity of material screened; (d) Quantity of vehicle miles travelled; and (e) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs).	Facility-wide



<b>Req. No.</b>	<b>Reporting Requirements</b>	<b>Equipment/ Activity ID No.</b>
29.	Emission test results must be reported to SWCAA in writing within 45 days of test completion.	1-3

### 3. General Provisions

<b>Req. No.</b>	<b>General Provisions</b>
A.	For the purpose of ensuring compliance with this ADP/NEP, 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/NEP and applicable regulations and to perform or require such tests as may be deemed necessary.
B.	The provisions, terms, and conditions of this ADP/NEP 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/NEP survive any transfer of ownership of the source or any portion thereof.
D.	This ADP/NEP must be posted conspicuously at or be readily available near the source.
E.	This ADP/NEP 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/NEP does not supersede requirements of other agencies with jurisdiction and further, this ADP/NEP does not relieve the Permittee of any requirements of any other governmental agency. In addition to this ADP/NEP, the Permittee may be required to obtain permits or approvals from other agencies with jurisdiction.
G.	Compliance with the terms of this ADP/NEP 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/NEP is held to be invalid, all unaffected provisions of the ADP/NEP will remain in effect and be enforceable.
I.	No change in this ADP/NEP 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/NEP, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act.

<b>Req. No.</b>	<b>General Provisions</b>
K.	For the purposes of establishing if a condition of this ADP/NEP has been violated or is being violated, nothing in this ADP/NEP 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 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.

#### 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 in an approved electronic format 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.