



May 5, 2025

Dustin Harris
Clark Regional Wastewater District
8000 NE 52nd Court
Vancouver, WA 98668

RE: Final Air Discharge Permit for Four New Emergency Generator Engines

Dear Dustin Harris:

A final determination to issue Air Discharge Permit (ADP) 25-3707 has been completed for ADP application CL-3293 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 CL-3293 was published in the permit section of SWCAA's website on March 20, 2025. 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 25-3707 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 25-3707 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 Abraham Apfel at (360) 574-3058, extension 124.

Sincerely,

Uri Papish
Executive Director

UP:AA

Enclosure: Technical Support Document and Air Discharge Permit 25-3707





AIR DISCHARGE PERMIT
25-3707

Issued: May 5, 2025

Clark Regional Wastewater District
8000 NE 52nd Court, Vancouver, Washington 98668

SWCAA ID – 1808

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	Waters Edge Emergency Generator Engine N-53, Ford WSG1068, 04US29203	Low sulfur fuel (natural gas)
2	Osprey Pointe Emergency Generator Engine R-65, General Motors 8.1 L, 4-Cycle, naturally aspirated, s/n: 116009-1005	Low sulfur fuel (natural gas)
3	Cassini View Emergency Generator Engine R-59, Ford WSG-1068, 04PS36824	Low sulfur fuel (natural gas)
4	Heron Ridge Emergency Generator Engine R-62, General Motors 5.7L, 4 cycle, LM378863	Low sulfur fuel (natural gas)
5	Taverner Ridge Emergency Generator Engine R-67, General Motors 8.1L, 4 cycle, 106298-1204	Low sulfur fuel (natural gas)
6	Portable Emergency Generator Engine One PG-1, Hercules DT-2300, JZ3473577 DT2300X004	Ultra-low sulfur diesel
7	Portable Emergency Generator Engine Two PG-2, Hercules DT-2300, KA3473619 D2300X004	Ultra-low sulfur diesel
8	Portable Emergency Generator Engine Three PG-3, Perkins T4.236, U719497A on tag (serial number portion is "719497")	Ultra-low sulfur diesel
9	Portable Emergency Generator Engine Four PG-4, Hercules D-2000, KA3473623 D2000 X130	Ultra-low sulfur diesel
10	Portable Emergency Generator Engine Five PG-5, John Deere 4219DF 01, 316289T	Ultra-low sulfur diesel
11	Portable Emergency Generator Engine Six PG-6, Caterpillar 3054, K2K04363	Ultra-low sulfur diesel
12	District Office Admin Emergency Generator Engine DOG-1, John Deere 6068TF275F, PE6068T569903	Ultra-low sulfur diesel
13	Schuller Estates Emergency Generator Engine E-42, Perkins 1004.4T, AH51042*U575819K on tag (serial number portion is "575819")	Ultra-low sulfur diesel
14	Glenwood Emergency Generator Engine E-44, Caterpillar 3412, 81Z20126	Ultra-low sulfur diesel
15	Green Meadows Emergency Generator Engine E-32, Caterpillar 3054, 4ZK03188	Ultra-low sulfur diesel
16	Bowyers Marketplace Emergency Generator Engine E-54, Cummins 4BT3.3-G6NR, 68090831	Ultra-low sulfur diesel
17	Whipple Creek Place Emergency Generator Engine N-12, John Deere 4045TF150, PE4045T167402	Ultra-low sulfur diesel

ID No.	Equipment/Activity	Control Equipment/Measure
18	NW 149 th Street Emergency Generator Engine N-13, Perkins T4.236, LJ50418*U913237G on tag (serial number portion is "913237")	Ultra-low sulfur diesel
19	NE 16 th Ave. Emergency Generator Engine N-55, Cummins QSB5-G3 NR3, 73225621	Ultra-low sulfur diesel
20	Legacy Emergency Generator Engine N-52, John Deere 6081AF001, RG6081A169834	Ultra-low sulfur diesel
21	Wishing Wells Estates Emergency Generator Engine R-68, Perkins 4.236, LD33626*U507407W*	Ultra-low sulfur diesel
22	Teal Crest Emergency Generator Engine R-91, Cummins QSB5-G3, 21814604	Ultra-low sulfur diesel
23	Pioneer Canyon Emergency Generator Engine R-66, Caterpillar C6.6, E6M00069	Ultra-low sulfur diesel
24	Dunning Meadows Emergency Generator Engine E-70, Cummins 4BT3.3G5, 72011086	Ultra-low sulfur diesel
25	Marina Emergency Generator Engine R-73, John Deere 4024TF281D, PE4024R144865	Ultra-low sulfur diesel
26	Fieldstone Emergency Generator Engine E-75, Cummins 4BT3.3-G5, 72014992	Ultra-low sulfur diesel
27	Payne Emergency Generator Engine E-76, John Deere 4045HF285, PE4045L270027	Ultra-low sulfur diesel
28	Neil Kimsey Emergency Generator Engine N-78, Cummins QSX15-G9, 79838479	Ultra-low sulfur diesel
29	Hawks Landing Emergency Generator Engine R-80, Cummins 4BT3.3-G5, 72020125	Ultra-low sulfur diesel
30	Jessie Hollow Emergency Generator Engine E-79, Cummins 4BT3.3-G5, 72019972	Ultra-low sulfur diesel
31	Pioneer Place Emergency Generator Engine R-81, Cummins QSB5-G3 NR3, 74065514	Ultra-low sulfur diesel
32	Frasier Downs Emergency Generator Engine E-82, Cummins 4BT3.3-G5, 72021374	Ultra-low sulfur diesel
33	72 nd Avenue Emergency Generator Engine E-84, Cummins 4BTAA3.3-G7, 72030791	Ultra-low sulfur diesel
34	Royle Road Emergency Generator Engine R-83, Cummins QSB7-G5 NR, 74061730	Ultra-low sulfur diesel
35	Taverner Ridge Emergency Generator Engine R-85, Cummins QSB5-G5 NR3, 74149699	Ultra-low sulfur diesel
36	St. Johns Woods Emergency Generator Engine E-94, Cummins 4BT3.3-G5, 72041035	Ultra-low sulfur diesel

ID No.	Equipment/Activity	Control Equipment/Measure
37	Kennedy Farm Emergency Generator Engine R-86, Cummins QSB5, 74292709	Ultra-low sulfur diesel
38	10 th Avenue Emergency Generator Engine R-87, Cummins QSB5-G13, 74373904	Ultra-low sulfur diesel
39	Curtin Creek Emergency Generator Engine E-88, Cummins QSB5-G5, 74384382	Ultra-low sulfur diesel
40	UNFI Emergency Generator Engine R-90, Cummins 4BT3.3-G5, 72045822	Ultra-low sulfur diesel
41	North Junction Emergency Generator Engine R-92, John Deere 4045HF285H, PE4045N022101	Ultra-low sulfur diesel
42	Union Road Emergency Generator Engine N-25, John Deere 4045HF285H, PE4045N023910	Ultra-low sulfur diesel
43	Pleasant Valley North Emergency Generator Engine E-89, Cummins QSB5-G13, KCEXL0275AAK	Ultra-low sulfur diesel
44	District Office Ops Emergency Generator DOG-2, John Deere 6090HFG85A, PE6068N016526	Ultra-low sulfur diesel
45	Ridgefield Heights Emergency Generator Engine, R-94, Cummins 4BT3.3-G5, 72061037	Ultra-low sulfur diesel
46	North Haven Emergency Generator Engine N-88, John Deere 4045HF285H, PE4045N030211	Ultra-low sulfur diesel
47	Seton Emergency Generator Engine R-96, Cummins QSB5-G6, 74614224	Ultra-low sulfur diesel
48	Woodbrook Emergency Generator Engine E-97, John Deere 4045HF285K, PE4045N039169	Ultra-low sulfur diesel
49	Whipple Creek North Emergency Generator Engine E-101, John Deere 4045HF285K, PE4045N044294	Ultra-low sulfur diesel
50	Whipple Creek West Emergency Generator Engine N-98, Cummins QSB5-G6, 22679699	Ultra-low sulfur diesel
51	Portable Emergency Generator Engine Eight PG-8, Cummins QSB7-G5, 73630321	Ultra-low sulfur diesel
52	Whipple Creek East Station F Emergency Generator Engine E-103, Cummins QSB7-G5, TBD	Ultra-low sulfur diesel
53	McCormick Creek Emergency Generator Engine R-102, Cummins QSB7-G5, 22701231	Ultra-low sulfur diesel
54	Silver Star Emergency Generator Engine E-41, Kohler KDI3404TM, S127202060	Ultra-low sulfur diesel
55	Six Odor Control Stations	5 biofilters, 1 carbon canister

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 25-3707 will supersede ADP 19-3321, SUN-213, SUN-214, SUN-215, SUN-253, SUN-261, SUN-270, SUN-276, SUN-277, SUN-302, and SUN-313 in their entirety.

Emission Limits

Req. No.	Emission Limits	Equipment/ Activity ID No.
1.	Visible emissions from the natural gas-fired engines must not exceed zero percent (0%) opacity for more than three (3) minutes in any one-hour period as determined in accordance with EPA Method 9 (See Appendix A of SWCAA 400).	1-5
2.	Visible emissions from the emergency generator diesel engines 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 (See Appendix A of SWCAA 400) except during startup. For the purposes of this requirement, the startup period ends when the earlier of the following operating events occurs: (a) The engine has reached normal operating temperature; or (b) The engine has been operating for 15 minutes.	6-54

Operating Limits and Requirements

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
3.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
4.	Operations that cause or contribute to a nuisance odor must use recognized good practice and procedures to reduce these odors to a reasonable minimum.	Facility-wide
5.	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
6.	Operation of the emergency generator engines are limited to maintenance checks, readiness testing, and as necessary to provide emergency power.	1-54
7.	All exhausts must be discharged vertically into the ambient air above the level of the building roof. Any device that obstructs or prevents vertical discharge is prohibited.	1-54

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
8.	Each emergency generator engine must be equipped with a non-resettable hour meter to record hours of operation.	1-54
9.	Operation of the emergency generator engines for maintenance checks and readiness testing must not exceed 100 hr/yr, each. Emergency operation of the emergency engines is not limited.	1-5, 12-51, 53-55
10.	The diesel-fired emergency generator engines must only be fired on diesel fuel with a maximum sulfur content of 15 ppmw. Any fuel other than ultra-low sulfur diesel fuel must be approved by SWCAA in writing prior to use.	6-54
11.	All odor control stations must be operated properly and maintained in working order. All equipment malfunctions or improper operations of the above equipment must be corrected promptly after identification.	55
12.	Odor control devices addressed by this permit must be operated when necessary to prevent nuisance odors from escaping the controlled space.	55
13.	Biofilter media must be maintained moist at all times. If necessary, water must be added to the air stream entering a specific biofilter and/or through the use of an above ground sprinkling system.	55
14.	The growth of large plants in open biofilters must be controlled to prevent channeling caused by plant roots.	55

Monitoring and Recordkeeping Requirements

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
15.	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
16.	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

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
17.	<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"> (a) The number of hours each engine identified in this Permit is operated must be recorded for each calendar year; (b) Maintenance activities that may affect emissions from the emergency generator engines and odor control stations must be logged for each occurrence; (c) The sulfur content of the diesel fuel burned in the diesel-fired emergency generator engines must be determined and recorded for each fuel delivery. A fuel supplier certification may be used in lieu of actual fuel testing; (d) The results of odor control station inspections must be recorded for each occurrence; (e) Excess emissions must be recorded for each occurrence; and (f) 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
18.	All active odor control stations must be inspected monthly to determine if the equipment is operating properly and if nuisance level odors are present.	55

Emission Monitoring and Testing Requirements

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

Reporting Requirements

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
19.	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
20.	<p>Excess emissions must be reported to SWCAA as follows:</p> <ul style="list-style-type: none"> (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
21.	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

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
22.	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
23.	An annual emissions inventory report must be submitted to SWCAA by March 15 for emissions from the previous calendar year in accordance with SWCAA 400-105(1). Each report must contain, at a minimum, the following information: (a) The total number of hours each emergency generator engine was operated; and (b) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs).	Facility-wide

3. General Provisions

Req. No.	General Provisions
A.	For the purpose of ensuring compliance with this ADP, duly authorized representatives of the Southwest Clean Air Agency must be permitted access to the Permittee's premises and the facilities being constructed, owned, operated and/or maintained by the Permittee for the purpose of inspecting said facilities. These inspections are required to determine the status of compliance with this ADP and applicable regulations and to perform or require such tests as may be deemed necessary.
B.	The provisions, terms, and conditions of this ADP bind the Permittee, its officers, directors, agents, servants, employees, successors and assigns, and all persons, firms, and corporations acting under or for the Permittee.
C.	The requirements of this ADP survive any transfer of ownership of the source or any portion thereof.
D.	This ADP must be posted conspicuously at or be readily available near the source.
E.	This ADP will be invalidated, in whole or in part, if construction or installation of any new or modified equipment has not commenced within eighteen (18) months from date of issuance, if construction is discontinued for a period of eighteen (18) months or more without prior SWCAA approval, or if construction is not completed within a reasonable time.
F.	This ADP does not supersede requirements of other agencies with jurisdiction and further, this ADP does not relieve the Permittee of any requirements of any other governmental agency. In addition to this ADP, the Permittee may be required to obtain permits or approvals from other agencies with jurisdiction.
G.	Compliance with the terms of this ADP does not relieve the Permittee from the responsibility of compliance with SWCAA General Regulations for Air Pollution Sources, previously issued Regulatory Orders, RCW 70A.15, Title 173 WAC or any other applicable emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply.

Req. No.	General Provisions
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 ensure 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.