



July 9, 2025

Ms. Suzanne Douglas, General Manager  
Swanson Bark & Wood Products, Inc.  
240 Tennant Way  
Longview, WA 98632

Subject: Final Air Discharge Permit / Nonroad Engine Permit for Replacement Nonroad Diesel Engine

Dear Ms. Douglas:

A final determination to issue Air Discharge Permit / Nonroad Engine Permit 25-3716 (ADP/NEP 25-3716) has been completed for ADP/NEP Application CO-1119 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 CO-1119 was published in the permit section of SWCAA's internet website on June 6, 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 was not provided for this permitting action. Electronic copies of ADP/NEP 25-3716 and the associated Technical Support Document are available for public review in the permit section of SWCAA's internet website (<http://www.swcleanair.gov/permits/adpfinal.asp>). Original copies are enclosed for your files.

This Air Discharge Permit / Nonroad Engine Permit may be appealed directly to the Pollution Control Hearings Board (PCHB) within 30 days of receipt as provided in RCW 43.21B.

If you have any comments, or desire additional information, please contact me or Wess Safford at (360) 574-3058, extension 126.

Sincerely,

Uri Papish  
Executive Director

UP:wls

Enclosure – ADP/NEP 25-3716 and Technical Support Document





**SWCAA**  
Southwest Clean Air Agency


**AIR DISCHARGE PERMIT / NONROAD ENGINE PERMIT  
25-3716**

**Issued: July 9, 2025**

**Swanson Bark & Wood Products  
240 Tennant Way, Longview, WA 98632**

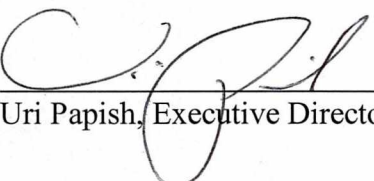
**SWCAA ID - 2513**

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 Measure/Equipment
1	Fugitive Dust Sources	Wet Suppression
2	Horizontal Grinder R-3 (Peterson 4710B)	Wet Suppression
3	Horizontal Grinder R-74 (CBI Magnum Force 6800 CT)	Wet Suppression
4	Bagging Operation Dust Collector (MikroPul 64STR 10-20)	Process Enclosure, High Efficiency Filtration
5	Diesel Engine – Horizontal Grinder R-3 (Caterpillar – 765 bhp <i>nonroad</i> )	Ultra-low Sulfur Diesel, EPA Tier 2 Certification
6	Diesel Engine – Horizontal Grinder R-74 (Caterpillar – 1,050 bhp <i>nonroad</i> )	Ultra-low Sulfur Diesel, EPA Tier 4 Certification

## 2. Approval Conditions

The following tables detail the specific requirements of this permit. In addition to the requirements listed below, equipment at this facility may be subject to other federal, state, and local regulations. The permit requirement number is identified in the left-hand column. The text of the permit requirement is contained in the middle column. The emission unit, equipment, or activity to which the permit requirement applies is listed in the right-hand column.

ADP/NEP 25-3716 supersedes ADP/NEP 23-3609 in its entirety.

### Emission Limits

Req. No.	Emission Limits	Equipment/ Activity ID No.				
1.	Visible emissions from approved operations must not exceed 0% opacity for more than 3 minutes in any one-hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).	1-4				
2.	Emissions from the Bagging Operations Dust Collector must not exceed the following: <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>PM/PM<sub>10</sub></td><td>1.13 tpy, 0.005 gr/dscf (1-hour average)</td></tr></table> Annual emissions must be calculated from actual hours of operation consistent with the methodology in Section 6 of the Technical Support Document for this Permit.	<u>Pollutant</u>	<u>Emission Limit</u>	PM/PM <sub>10</sub>	1.13 tpy, 0.005 gr/dscf (1-hour average)	4
<u>Pollutant</u>	<u>Emission Limit</u>					
PM/PM <sub>10</sub>	1.13 tpy, 0.005 gr/dscf (1-hour average)					
3.	Visible emissions from nonroad diesel-fired engines must not exceed 5% opacity for more than 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.	5-6				

**Operating Limits and Requirements**

<b>Req. No.</b>	<b>Operating Limits and Requirements</b>	<b>Equipment/ Activity ID No.</b>
4.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
5.	The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facility-wide
6.	Reasonable precautions must be used to prevent fugitive dust from becoming airborne. Reasonable precautions include the use of adequate wet suppression or enclosure of the operations responsible for creating fugitive dust.	Facility-wide
7.	Wet suppression must be provided as necessary to control fugitive dust from material handling equipment, wood grinding, wood chipping, screening activities, storage piles, and processing areas in the event that process changes, dry weather, or other conditions result in insufficient water application to control fugitive dust. Wet suppression may include wetting materials prior to handling, grinding, chipping, and screening activities to prevent dust generation, or the use of high-pressure (i.e., $\geq 80$ psig) or sonic fogging nozzles at the point of dust generation.	Facility-wide
8.	Use of emission units not identified in this Permit (e.g., engine powered grinders and screens) is not allowed without prior written approval from SWCAA.	Facility-wide
9.	If nuisance odors are identified from the Permittee's facility, the Permittee must implement a Progressive Odor Management Plan in accordance with Appendix A of this Permit. SWCAA may require additional measures consistent with SWCAA 400-040(4) in the event that the Progressive Odor Management Plan fails to adequately address odor impacts. Implementation of the corrective actions identified in the Progressive Odor Management Plan does not shield the Permittee from enforcement actions by SWCAA.	Facility-wide
10.	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.	1-6
11.	Exhaust from the Bagging Operations Dust Collector must be discharged vertically. Any rain cap that interferes with vertical dispersion is prohibited.	4
12.	A nonresettable time totalizer must be maintained on each nonroad engine and used to measure hours of operation.	5-6
13.	Nonroad diesel engines must only be fired on #2 diesel or better. The sulfur content of fuel fired in the diesel engines must not exceed 0.0015% by weight (15 ppm). A fuel certification from the fuel supplier may be used to demonstrate compliance with this requirement.	5-6

**Monitoring and Recordkeeping Requirements**

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.								
14.	With the exception of data logged by a computerized data acquisition system, each record required by this Permit must include the date and the name of the person making the record entry. If a control device or process is not operating during a specific time period, a record must be made to that effect.	Facility-wide								
15.	All records required by this Permit must be kept for a minimum period of no less than three years and must be maintained in a form readily available for inspection by SWCAA representatives.	Facility-wide								
16.	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								
17.	Excess emissions and upset conditions must be recorded for each occurrence.	1-6								
18.	<div>The Permittee must monitor and record the following information:<table><tr><td>(a) Hours of operation for each nonroad engine</td><td>Recorded monthly</td></tr><tr><td>(b) Hours of operation for each dust collector</td><td>Recorded monthly</td></tr><tr><td>(c) Fuel sulfur content of nonroad engine fuel</td><td>Recorded for each fuel delivery</td></tr><tr><td>(d) Maintenance and repair activities that might affect air emissions</td><td>Recorded for each occurrence</td></tr></table></div>	(a) Hours of operation for each nonroad engine	Recorded monthly	(b) Hours of operation for each dust collector	Recorded monthly	(c) Fuel sulfur content of nonroad engine fuel	Recorded for each fuel delivery	(d) Maintenance and repair activities that might affect air emissions	Recorded for each occurrence	1-6
(a) Hours of operation for each nonroad engine	Recorded monthly									
(b) Hours of operation for each dust collector	Recorded monthly									
(c) Fuel sulfur content of nonroad engine fuel	Recorded for each fuel delivery									
(d) Maintenance and repair activities that might affect air emissions	Recorded for each occurrence									

**Emission Monitoring and Testing Requirements**

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

**Reporting Requirements**

<b>Req. No.</b>	<b>Reporting Requirements</b>	<b>Equipment/ Activity ID No.</b>
19.	<p>All air quality related complaints received by the Permittee must be reported to SWCAA within three days of receipt. Complaint reports must include the following information:</p> <ul style="list-style-type: none"> <li>(a) Date and time of the complaint;</li> <li>(b) Name of the complainant;</li> <li>(c) Nature of the complaint; and</li> <li>(d) Description of corrective action taken in response to complaint (if any).</li> </ul>	Facility-wide
20.	<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 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 48 hours after discovery for emissions which the Permittee wishes to claim as unavoidable pursuant to SWCAA 400-107; and</li> <li>(c) No later than 30 days after the end of the month of discovery for all other excess emissions.</li> </ul>	1-6

<b>Req. No.</b>	<b>Reporting Requirements</b>	<b>Equipment/ Activity ID No.</b>
21.	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 nonroad engine; (b) Hours of operation for each dust collector; and (c) Estimated air emissions.	1-6

### 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.

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

### **Progressive Odor Management Plan**

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

The purpose of the Progressive Odor Management Plan (POMP) is to address odor impacts of the Permittee's facility on neighboring properties. The POMP consists of four levels of corrective action and response to odor nuisances. The POMP does not supersede the requirements in SWCAA 400-040(4) regarding odor, but rather provides a separate regulatory mechanism to assure that odor nuisances are addressed in a timely manner.

#### **2. Identification of Nuisance Odor Problems:**

Nuisance odors can be identified by the Permittee or SWCAA. To be considered a nuisance, odor complaints from neighboring property owners must be verified by the Permittee or SWCAA.

#### **3. Response to Nuisance Odor Problems:**

The Permittee will take the following actions to address odor impacts until nuisance odors are reduced to a reasonable minimum as determined by SWCAA:

##### **Level One**

Each of the operational aspects that impact odor generation and control will be evaluated by operating personnel as to their contribution to the offensive odor. The primary odor generating operating condition will be corrected or adjusted using existing process management tools to minimize odor generation. The adjustments will be made as quickly as functionally possible. Corrective action must be initiated immediately but no later than 24 hours after the problem is identified. Level One corrective action must take precedence over other facility operations. If corrective actions require that parts or materials be ordered, the parts or material orders must be expedited if expediting the order will speed resolution of the odor nuisance.

##### **Level Two**

If the odor nuisance persists after the operators state that all conditions have been checked and are working appropriately, the Permittee must evaluate the odors and the operational factors affecting odor generation and propose new procedures or handling methods with existing process management tools. The proposal must be submitted in writing to SWCAA within five working days after completion of Level One activities and identification of a continuing odor nuisance by the Permittee or SWCAA. If SWCAA does not disapprove of the plan within five working days of receipt, the Permittee must immediately begin implementation of the proposed new procedures or handling methods at the end of the five working day review period. If SWCAA disapproves of the proposed new procedures or handling methods, SWCAA may require that the plan be modified, or a new plan be submitted. Level Two corrective action must take precedence over other facility operations.

##### **Level Three**

If the odor nuisance persists after the completion of Level Two corrective action, and is attributed to specific materials, those materials must no longer be handled at the facility except for incidental amounts for experimentation. Future acceptance of these materials will be subject to New Source Review and approval by SWCAA.

### **3. Response to Nuisance Odor Problems (continued):**

#### **Level Four**

If the odor nuisance persists after all Level One through Level Three options have been exhausted, the Permittee must:

- (a) Commission a third-party to observe operations, document and propose process modification options, as well as perform air sampling and evaluation. The evaluation can be done through air odorant chemical sampling, professional odor panels or a local four-part odor panel. The panel would be used to characterize and quantify the odors. If necessary, odor dispersion modeling will be used to project the effectiveness of proposed facility or technology changes.
- (b) Submit the third-party's report to SWCAA within 60 days of initiating Level Four corrective action.
- (c) If persistent nuisance odors are attributed to the lack of, or adequacy of, structures, equipment, or air treatment methods, physical changes must be made to the Permittee's facility. Depending on the changes required, New Source Review or other pre-construction permitting may be required prior to making the proposed change. A schedule for implementing these changes must be developed with SWCAA, allowing for normal permitting and construction timelines. The construction must progress as quickly as reasonably possible. Once changes are fully implemented, the Permittee must evaluate the effectiveness of the changes and summarize the results of the evaluation in a report to SWCAA.

### **4. Progress Reports:**

In addition to the third-party evaluation report required with a Level Four corrective action, the Permittee must submit the following reports to SWCAA:

- (a) A report on the progress of any on-going Level One through Level Four corrective actions at least once every five working days until the corrective action is completed.
- (b) A report on the actions taken and an evaluation of the effectiveness of those actions at the completion of any Level One through Level Four corrective action.