



TECHNICAL SUPPORT DOCUMENT

**Air Discharge Permit / Nonroad Engine Permit 25-3716
Air Discharge Permit / Nonroad Engine Permit Application CO-1119**

Issued: July 9, 2025

Swanson Bark & Wood Products

SWCAA ID - 2513

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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	NSPS	New Source Performance Standard
ASIL	Acceptable Source Impact Level	PSD	Prevention of Significant Deterioration
BACT	Best available control technology	RCW	Revised Code of Washington
CAM	Compliance Assurance Monitoring	SCC	Source Classification Code
CAS#	Chemical Abstracts Service registry number	SDS	Safety Data Sheet
CFR	Code of Federal Regulations	SQER	Small Quantity Emission Rate listed in WAC 173-460
EPA	U.S. Environmental Protection Agency	Standard	Standard conditions at a temperature of 68°F (20°C) and a pressure of 29.92 in Hg (760 mm Hg)
EU	Emission Unit	SWCAA	Southwest Clean Air Agency
mfr	Manufacturer	WAC	Washington Administrative Code
NEP	Nonroad engine permit		

List of Units and Measures

acfm	Actual cubic foot per minute	ppm	Parts per million
bhp	Brake horsepower	ppmv	Parts per million by volume
gpm	Gallon per minute	ppmvd	Parts per million by volume, dry
gr/dscf	Grain per dry standard cubic foot	ppmw	Parts per million by weight
hp	Horsepower	rpm	Revolution per minute
hp-hr	Horsepower-hour	scfm	Standard cubic foot per minute
kW	Kilowatt	tpy	Tons per year
MMBtu	Million British thermal unit		

List of Chemical Symbols, Formulas, and Pollutants

C ₃ H ₈	Propane	PM	Particulate Matter with an aerodynamic diameter 100 µm or less
CH ₄	Methane		
CO	Carbon monoxide		
CO ₂	Carbon dioxide	PM ₁₀	PM with an aerodynamic diameter 10 µm or less
CO _{2e}	Carbon dioxide equivalent		
H ₂ S	Hydrogen sulfide	PM _{2.5}	PM with an aerodynamic diameter 2.5 µm or less
HAP	Hazardous air pollutant listed pursuant to Section 112 of the Federal Clean Air Act	SO ₂	Sulfur dioxide
		SO _x	Sulfur oxides
NO _x	Nitrogen oxides	TAP	Toxic air pollutant pursuant to Chapter 173-460 WAC
O ₂	Oxygen		
O ₃	Ozone	VOC	Volatile organic compound

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:	Swanson Bark & Wood Products
Applicant Address:	240 Tennant Way, Longview, Washington 98632
Facility Name:	Swanson Bark & Wood Products
Facility Address:	240 Tennant Way, Longview, Washington 98632
SWCAA Identification:	2513
Contact Person:	Suzanne Douglas, General Manager
Primary Process:	Bark Products
SIC/NAICS Code:	2411 / Logging Contractors 113310 / Logging
Facility Latitude and Longitude	46°06'44.09"N 122°54'09.71"W
Facility Classification:	Natural Minor / Nonroad Engine

2. FACILITY DESCRIPTION

Swanson Bark & Wood Products (Swanson) receives, grinds, blends, and screens wood, brush, and soil-based materials. The facility sells and ships bark, soil blends, mulch, hogged fuel, and rock products.

3. CURRENT PERMITTING ACTION

This permitting action is in response to Air Discharge Permit/Nonroad Engine Permit application number CO-1119 (ADP/NEP Application CO-1119) dated June 3, 2025. Swanson submitted ADP/NEP Application CO-1119 requesting approval of the following:

- Replacement of the nonroad diesel engine associated with Horizontal Grinder R3.

The current permitting action provides approval for the equipment changes proposed in ADP/NEP Application CO-1119. ADP/NEP 25-3716 will supersede ADP/NEP 23-3609 in its entirety.

4. PROCESS DESCRIPTION

- 4.a. Material Handling (existing). The proposed facility receives wood, brush, and soil-based materials in bulk. Received materials are sorted, ground, screened, and blended to produce saleable mixtures. Final product is sold both retail and wholesale for use in the agricultural and landscape markets. A portion of the material handled at the site is resold as industrial boiler fuel. Rock and gravel material are screened and/or washed at the facility, but no rock crushing takes place onsite. Material storage piles, haul roads, and other dust sources are watered as necessary to control fugitive dust emissions.

- 4.b. Nonroad Diesel Engines (existing). Selected pieces of portable equipment at this facility are powered by diesel engines. These engines are classified as nonroad engines.

5. EQUIPMENT/ACTIVITY IDENTIFICATION

- 5.a. Fugitive Dust Sources (existing). Fugitive dust from facility material handling activities is controlled with wet suppression, as necessary. Fugitive dust sources include but are not necessarily limited to:

- (1) Nugget processing equipment;
- (2) Bark Processing equipment;
- (3) Fiber and urban wood shaker;
- (4) Boiler fuel screen plant;
- (5) Vehicle haul roads; and
- (6) Storage pile wind erosion.

Location: 46°06'45.21"N 122°54'13.09"W

- 5.b. Horizontal Grinder R-3 (existing). This unit is a track mounted, horizontal grinder powered by an integral diesel engine. Fugitive dust from grinder operation is controlled with wet suppression, as necessary.

Make / Model: Peterson Pacific Corp / 4710B (s/n 29B-89-1527)
 Manufactured: 2008
 Size / Capacity: 360 yd³ / 95 tons per hour (green waste)
 Location: 46°06'43.37"N 122°54'12.12"W

ADP/NEP Application CO-1119. Swanson proposes to replace the existing diesel engine power unit for Horizontal Grinder R-3. Swanson is not proposing to modify the grinder itself.

- 5.c. Horizontal Grinder R-74 (existing). This unit is a track mounted, horizontal grinder powered by an integral diesel engine. Fugitive dust from grinder operation is controlled with wet suppression, as necessary.

Make / Model: CBI Magnum Force / 6800 CT (s/n 011186)
 Manufactured: Feb 2020
 Size / Capacity: 200 yd³ per hour (green waste)
 Location: 46°06'43.37"N 122°54'12.12"W

- 5.d. Bagging Operation Dust Collector (existing). This unit is a dust collector that serves a central vacuum system associated with product bagging operations at the facility.

Make / Model: MikroPul / 64STR10-20
 Rated Airflow: 6,000 acfm (est.)
 Filter Bags: 64 bags, polypropylene fabric
 Filtration Area/Media: 603 ft²
 Exhaust Configuration: 13" x 15" exhaust, vertical at ~10' above grade.
 Location: 46°06'45.13"N 122°54'05.94"W

- 5.e. Diesel Engine - Horizontal Grinder R-3 (removed). This unit is a diesel engine integral to Horizontal Grinder R-3. The engine powers the grinder and the tracks on which it is mounted. This unit is classified as a nonroad engine.

Engine Make / Model: Caterpillar / C-18 (s/n WRH05916)
 Engine Power Rating: 765 bhp (full load)
 Engine Fuel Consumption: 37.6 gal/hr (diesel - full load)
 Engine Mfg Date: 2006
 Engine Certification: EPA Tier 2
 NSPS/MACT Applicable: No
 Stack Description: 6" diameter vertical discharge at ~8' above grade
 Location: 46°06'43.37"N 122°54'12.12"W

ADP/NEP Application CO-1119. Swanson proposes to replace this diesel engine with the diesel engine listed below. Once replaced, the engine will be removed from the facility.

- 5.f. Diesel Engine - Horizontal Grinder R-3 (new). This unit is a diesel engine integral to Horizontal Grinder R-3. The engine powers the grinder and the tracks on which it is mounted. This unit is classified as a nonroad engine.

Engine Make / Model: Caterpillar / C-18 (s/n WRH14881)
 Engine Power Rating: 765 bhp (full load)
 Engine Fuel Consumption: 37.1 gal/hr (diesel - full load)
 Engine Mfg Date: 2023
 Engine Certification: EPA Tier 2
 NSPS/MACT Applicable: No
 Stack Description: 6" diameter vertical discharge at ~8' above grade
 Location: 46°06'43.37"N 122°54'12.12"W

ADP/NEP Application CO-1119. Swanson proposes to install this diesel engine as a replacement for the existing diesel engine in Horizontal Grinder R-3. No other changes will be made to the grinder.

- 5.g. Diesel Engine - Horizontal Grinder R-74 (existing). This unit is a diesel engine integral to Horizontal Grinder R-74. The engine powers all systems on the grinder. This unit is classified as a nonroad engine.

Engine Make / Model: Caterpillar / C27 (s/n AT400496)
 Engine Power Rating: 1,050 bhp (full load)
 Engine Fuel Consumption: 47.1 gal/hr (diesel)
 Engine Mfg Date: 2018
 Engine Certification: EPA Tier 4
 NSPS/MACT Applicable: No
 Stack Description: 5" diameter horizontal discharge at ~8' above grade
 Location: 46°06'43.37"N 122°54'12.12"W

- 5.h. Other Equipment

Gravel Washing. Various rock products are washed onsite in preparation for sale to the public.

5.i. Equipment/Activity Summary.

ID No.	Equipment/Activity	Control Equipment/Measure
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

6. EMISSIONS DETERMINATION

Emissions to the ambient atmosphere from the equipment and activities proposed in ADP/NEP Application CO-1119 consist of nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), particulate matter (PM), and sulfur dioxide (SO₂).

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. Fugitive Dust Sources (*existing*). Potential emissions from fugitive dust sources, including wood grinding/screening, can be significant if such sources are not managed properly. Wet suppression is required as necessary to prevent the generation of fugitive dust. With proper management, emissions from these sources are expected to be negligible.
- 6.b. Bagging Operations Dust Collector (*existing*). Potential emissions from baghouse operation are calculated based on the estimated discharge rate, a maximum emission concentration of 0.005 gr/dscf and 8,760 hr/yr of operation. All PM emissions are assumed to be PM₁₀. PM_{2.5} emissions are assumed to be 53% of PM₁₀ emissions (EPA PM Calculator Ver 2.0 / SCC-30703099).

Dust Collector	Pollutant	Discharge	Emission	Emissions	
		Rate (cfm)	Concentration (gr/dscf)	(lb/hr)	(tpy)
Bagging Operations	PM/PM ₁₀	6,000	0.005	0.26	1.13
	PM _{2.5}		53% PM	0.14	0.60

- 6.c. Diesel Engine - Horizontal Grinder R-3 (new). Potential emissions from the diesel engine power unit are calculated based on 4,420 hr/yr of operation, use of ultra-low sulfur diesel (<0.0015% sulfur by weight), and a maximum engine rating of 765 hp. Annual emissions will be calculated from actual hours of operation using the emission factors identified below.

Hours of Operation =	4,420	hours
Power Output =	765	horsepower
Diesel Density =	7.206	pounds per gallon
Fuel Sulfur Content =	0.0015	% by weight
Fuel Consumption Rate =	37.10	gallons per hour (estimated)
Fuel Heat Content =	0.138	MMBtu/gal (for use with GHG factors from 40 CFR 98)

<u>Pollutant</u>	EF		<u>EF Source</u>
	<u>lb/hr</u>	<u>tpy</u>	
NO _x	10.07	22.25	Caterpillar
CO	0.74	1.64	Caterpillar
VOC	0.090	0.20	Caterpillar
SO _x as SO ₂	0.0080	0.018	Mass Balance
PM/PM ₁₀	0.14	0.31	Caterpillar
PM _{2.5}	0.14	0.31	Caterpillar

<u>Greenhouse Gases</u>	<u>kg/MMBtu</u>	<u>GWP</u>	CO ₂ e		<u>tpy, CO₂e</u>	
			<u>lb/MMBtu</u>	<u>lb/gallon</u>		
CO ₂	73.96	1	163.05	23	1,845	40 CFR 98
CH ₄	0.003	25	0.165	0.023	1.87	40 CFR 98
N ₂ O	0.0006	298	0.394	0.054	4.46	40 CFR 98
Total GHG - CO ₂ e	73.9636		163.613	23	1,851	

- 6.d. Diesel Engine - Horizontal Grinder R-74 (existing). Potential emissions from the diesel engine power unit are calculated based on 2,080 hr/yr of operation, use of ultra-low sulfur diesel (<0.0015% sulfur by weight), and a maximum engine rating of 1,050 hp. Annual emissions will be calculated from actual hours of operation using the emission factors identified below.

Hours of Operation =	2,080	hours
Power Output =	1,050	horsepower
Diesel Density =	7.206	pounds per gallon
Fuel Sulfur Content =	0.0015	% by weight
Fuel Consumption Rate =	47.10	gallons per hour (estimated)
Fuel Heat Content =	0.138	MMBtu/gal (for use with GHG factors from 40 CFR 98)

<u>Pollutant</u>	<u>EF Emissions</u>		<u>EF Source</u>
	<u>lb/hr</u>	<u>tpy</u>	
NO _x	5.35	5.57	Caterpillar
CO	0.17	0.18	Caterpillar
VOC	0.069	0.072	Caterpillar
SO _x as SO ₂	0.010	0.011	Mass Balance
PM/PM ₁₀	0.069	0.072	Caterpillar
PM _{2.5}	0.069	0.072	Caterpillar

<u>Greenhouse Gases</u>	<u>kg/MMBtu</u>	<u>GWP</u>	<u>CO₂e</u>		<u>tpy, CO₂e</u>	
			<u>lb/MMBtu</u>	<u>lb/gallon</u>		
CO ₂	73.96	1	163.05	23	1,102	40 CFR 98
CH ₄	0.003	25	0.165	0.023	1.12	40 CFR 98
N ₂ O	0.0006	298	0.394	0.054	2.66	40 CFR 98
Total GHG - CO ₂ e	73.9636		163.613	23	1,106	

- 6.e. Emissions Summary/Facility-wide Potential to Emit. Facility-wide potential to emit as calculated in the sections above is summarized below.

<u>Pollutant</u>	<u>Nonroad Engine Emissions (tpy)</u>	<u>Stationary Source Emissions (tpy)</u>
NO _x	27.82	0.0
CO	1.81	0.0
VOC	0.27	0.0
SO ₂	0.03	0.0
Lead	0.0	0.0
PM/PM ₁₀	0.38	1.13
PM _{2.5}	0.38	0.60
TAP	0.0	0.0
HAP	0.0	0.0
CO ₂ e	2,957	0.0

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. Title 40 Code of Federal Regulations Part 60 (40 CFR 60) Subpart IIII "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines" requires that new diesel engines meet specific emission standards at the point of manufacture and during operation. In addition, maximum fuel sulfur contents are specified, and minimum maintenance standards are established. There are no stationary engines at this facility; therefore, this regulation does not apply to this facility.
- 7.b. 40 CFR 63 Subpart ZZZZ "National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines" establishes national emission limitations and operating limitations for HAP emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. There are no stationary engines at this facility; therefore, this regulation does not apply to this facility.
- 7.c. 40 CFR 1039 "Control of Emissions from New and In-use Nonroad Compression Ignition Engines" establishes standards for new non-road engines beginning with the 2008 model year for certain categories. The applicable year varies by engine category. In accordance with the relevant subpart, nonroad engines must meet the appropriate EPA Tier certification standards based on engine size and year of manufacture. Emission standards formerly codified in 40 CFR 89 have been moved to 40 CFR 1039 Appendix I. This subpart is applicable to the nonroad engines at this facility.

The definition of "nonroad engine" for this subpart is found in 40 CFR 1068.30 and includes any internal combustion engine that (1)(iii) "That, by itself or in or on a piece of equipment, is portable or transportable, meaning designed to be and capable of being carried or moved from one location to another..." "An internal combustion engine is not a nonroad engine if:... (iii) the engine otherwise included in Paragraph 1(iii) of this definition remains or will remain at a location for more than 12 consecutive months or a shorter period of time for an engine located at a seasonal source...A location is any single site at a building, structure, facility or installation."

States are precluded from requiring retrofitting of nonroad engines except that states are permitted to adopt and enforce any such retrofitting requirements identical to California requirements which have been authorized by EPA under section 209 of the Clean Air Act. States may enforce limitations on hours of usage, daily mass emission limits, and sulfur limits on fuel as necessary.

- 7.d. 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.e. 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.f. 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.g. 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.h. SWCAA 400-045 "Permit Applications for Nonroad Engines" requires, with a few exceptions, submittal of a permit application for installation of nonroad engines as defined in 40 CFR 1039. This regulation is applicable to the nonroad engines proposed for use by the permittee.
- 7.i. SWCAA 400-046 "Application Review Process for Nonroad Engines" requires that a nonroad engine permit be issued by the agency prior to the installation, replacement or alteration of any nonroad engine subject to the requirements of SWCAA 400-045. Each application must demonstrate that the installation will not cause an exceedance of any national or state ambient air quality standard.
- 7.j. 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.k. 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.l. 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.m. 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.n. 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:

- 8.a. Nonroad Engine Tier Certification. The nonroad diesel engine proposed in this permitting action complies with applicable EPA certification requirements, but is not subject to BACT.

New BACT Determinations

None.

Previous BACT Determinations

- 8.b. BACT Determination – Material Handling and Bagging (ADP/NEP 19-3334). The proposed use of process enclosure and fabric filtration has been determined to meet the requirements of BACT for PM emissions from material handling and bagging operations at this facility.

Other Determinations

- 8.c. 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.d. 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. Criteria Air Pollutant Review. Criteria pollutant emissions from approved operations are not expected to cause an adverse impact on ambient air quality.

Conclusions

- 9.b. Replacement of a diesel engine power unit, as proposed in ADP/NEP Application CO-1119, 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. Replacement of a diesel engine power unit, as proposed in ADP/NEP Application CO-1119, 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. Replacement of a diesel engine power unit, as proposed in ADP/NEP Application CO-1119, 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/NEP 25-3716 in response to ADP/NEP Application CO-1119. ADP/NEP 25-3716 contains approval requirements deemed necessary to assure compliance with applicable regulations and emission standards as discussed below.

- 10.a. Supersession of Previous Permits. ADP/NEP 25-3716 supersedes ADP/NEP 23-3609 in its entirety.
- 10.b. General Basis. Permit requirements for equipment affected by this permitting action incorporate the operating schemes proposed by the applicant in ADP/NEP Application CO-1119. Permit requirements established by this action are intended to minimize emissions and assure compliance with applicable requirements on a continuous basis.
- 10.c. Monitoring and Recordkeeping Requirements. ADP/NEP 25-3716 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 requirements are established for hours of operation.
- 10.d. Reporting Requirements. ADP/NEP 25-3716 establishes general reporting requirements for annual air emissions, upset conditions and excess emissions. Specific reporting requirements are established for hours of operation. Reports are to be submitted on an annual basis.
- 10.e. Nonroad Engines – Visible Emission Limits. Visible emissions from nonroad engines are limited to 5% opacity. Visible emissions should not exceed this level if the engines are operating properly. For nonroad engines, SWCAA uses this as a surrogate indicator that the engines are in good repair (rather than a tailpipe emission standard otherwise precluded by 40 CFR 1039). This restriction is appropriate because if the engine is not maintained in good repair, emissions are likely to greatly exceed expected emission levels and could cause an exceedance of a state or federal ambient air quality standard.
- 10.f. Nonroad Engines – Fuel Limitation. Only road-grade diesel fuel was evaluated for use in the nonroad engines, therefore operation on other, potentially dirtier, fuels is prohibited. The use of ultra-low-sulfur diesel ($\leq 0.0015\%$ by weight) is a reasonable control measure that reduces SO_x and PM emissions relative to fuels with a higher sulfur content. The permit allows the use of "#2 diesel or better." In this case, "or better" includes road-grade diesel fuel with a lower sulfur content, biodiesel, and mixtures of biodiesel and road-grade diesel that meet the definition of "diesel" and contain no more than 0.0015% sulfur by weight.
- 10.g. Requirements for Unmodified Emission Units. Permit requirements for existing emission units not affected by ADP/NEP Application CO-1119 are carried forward unchanged from ADP/NEP 23-3609.

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.

Diesel Engines. Visible emissions from the diesel engine power units are limited to 5% opacity or less during normal operation. The diesel engines may exhibit excess opacity upon startup. Therefore, visible emission limits do not apply to engine exhaust during start-up periods.

- 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 from those measures required under BACT considerations. Therefore, none were included in the permit requirements.

12. EMISSION MONITORING AND TESTING

There are no formal emission monitoring or testing requirements for this facility.

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>
23-3609	CO-1082	10/18/2023	Approval for a new mobile horizontal grinder powered by a nonroad diesel engine.
19-3334	CO-1011	4/25/2019	Approval for an existing bark bagging operation.
18-3267	CO-985	2/15/2018	Approval for existing bark handling, screening, grinding and sorting operations including associated nonroad engines.

- 13.b. Compliance History. A search of source records on file at SWCAA identified the following compliance issues during the past five (5) years. With issuance of ADP/NEP 25-3716 there are no outstanding compliance issues.

<u>Date</u>	<u>NOV Number</u>	<u>Violation</u>
11/21/2024	11387	Replacement of diesel engine power unit for Horizontal Grinder R-3 without prior approval.
8/24/2023	10940	Installation and operation of a new portable grinder (CBI Magnum Force 6800 CT) without prior approval.

14. PUBLIC INVOLVEMENT OPPORTUNITY

- 14.a. Public Notice for ADP/NEP Application CO-1119. Public notice for ADP/NEP Application CO-1119 was published on the SWCAA internet website for a minimum of (15) days beginning on June 6, 2025.
- 14.b. Public/Applicant Comment for ADP/NEP Application CO-1119. SWCAA did not receive specific comments, a comment period request or any other inquiry from the public regarding this ADP/NEP 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 replacement of existing equipment and does not involve material expansions or changes in use. SWCAA issued a Determination of SEPA Exempt (SWCAA 25-030) concurrent with issuance of ADP/NEP 25-3716.