



Southwest Clean Air Agency

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September 9, 2014

Mr. David Klemetsrud
Battle Ground School District
PO Box 200
Battle Ground, WA 98605-0200

Subject: Notification of Boiler Installation at the Prairie High School – (SUN-061)

Dear Mr. Klemetsrud:

The Southwest Clean Air Agency (SWCAA) received your Small Unit Notification (SUN) on July 28, 2014 for installation and operation of a new boiler at Prairie High School. The new boiler was one of two boilers that together replaced a Teledyne Laars boiler (serial number C94H07956). For administrative and tracking purposes SWCAA has assigned tracking number SUN-061 to this notification. This notification was filed in accordance with SWCAA 400-072 and applies to the installation of one boiler. The new boiler was identified as:

- (1) Hydrotherm model KN-20, natural gas fired condensing boiler with a rated heat input capacity of 1.999 MMBtu/hr. The boiler will be identified as "Main Boiler #1".

SWCAA has completed a review of your notification and the associated support information and has determined that the notification meets the requirements of SWCAA 400-072(2). Once installed, affected equipment must maintain compliance with the requirements of SWCAA 400-072(4)(b) "**Small gas fired boilers/heaters**". A copy of the relevant SWCAA 400-072 section is attached for your information. SWCAA 400-072(4)(b)(v) requires that emissions from the unit be tested within 60 days of initial operation and annually thereafter. Because you also have other boilers at your facility that require testing, SWCAA hereby approves the utilization of your currently approved testing schedule (no later than March of each year) for all subsequent testing of the new boiler unless a new schedule is approved by SWCAA.

Be advised that emission units installed pursuant to SWCAA 400-072 are subject to source registration and periodic inspection. Registration fees for this equipment will be invoiced consistent with SWCAA 400-100.

If you need further assistance or have any questions regarding these matters, please contact me at (360) 574-3058 extension 130.

Sincerely,

Paul T. Mairose
Chief Engineer

SWCAA 400-072 Emission Standards for Selected Small Source Categories

[Statutory Authority: Chapter 70.94.141 RCW. Original adoption 09-21-056 filed 10/15/09, effective 11/15/09.]

(4) Source categories.

(b) Small gas fired boilers/heaters.

- (i) **Applicability.** The provisions of this section apply to gas fired (natural gas/propane/LPG) boilers and heaters with individual rated heat inputs equal to or greater than 0.4 MMBtu/hr and equal to or less than 2.0 MMBtu/hr. For the purposes of this subsection, the term "boiler" means any combustion equipment designed to produce steam or to heat water that is not used exclusively to produce electricity for sale.
- (ii) **Emission limits and standards.**
 - (A) Visible emissions from the boiler exhaust stack shall not exceed zero percent opacity for more than 3 minutes in any one hour period as determined in accordance with SWCAA Method 9. (SWCAA 400, Appendix A).
 - (B) Each boiler/heater shall be equipped with combustion technology capable of maintaining NO_x and CO emissions at, or below, 30 ppmv and 50 ppmv, respectively (corrected to 3% O₂, dry).
- (iii) **General requirements.**
 - (A) Each boiler/heater shall only be fired on natural gas, propane, or LPG.
 - (B) Boiler/heater exhaust shall be discharged vertically above the roof peak of the building in which the emission unit is housed, and at a point higher than surrounding buildings. Any device that obstructs or prevents vertical discharge is prohibited.
- (iv) **Monitoring and recordkeeping requirements.** The information listed below shall be recorded at the specified intervals, and maintained in a readily accessible form for a minimum of 3 years. With the exception of data logged by a computerized data acquisition system, each required record shall include the date and the name of the person making the record entry.
 - (A) Quantity of fuel consumed by the boiler/heater shall be recorded for each calendar month;
 - (B) Maintenance activities for the boiler/heater shall be logged for each occurrence;
 - (C) Upset conditions that cause excess emissions shall be recorded for each occurrence; and
 - (D) All air quality related complaints received by the permittee and the results of any subsequent investigation or corrective action shall be recorded for each occurrence.
- (v) **Testing requirements.**
 - (A) Each boiler/heater shall undergo emission monitoring no later than 60 calendar days after commencing initial operation. Subsequent monitoring shall be conducted annually thereafter no later the end of the month in which the original monitoring was conducted. An alternate monitoring schedule may be implemented, but must be approved by the Agency prior to use. All emission monitoring shall be conducted in accordance with the requirements of SWCAA 400-106(2).
 - (B) If emission monitoring results for a boiler/heater indicate that emission concentrations may exceed 30 ppmvd NO_x or 50 ppmvd

CO, corrected to 3% O₂, the owner or operator shall either perform 60 minutes of additional monitoring to more accurately quantify CO and NO_x emissions, or initiate corrective action. Corrective action shall be initiated as soon as practical but no later than 3 business days after the potential exceedance is identified. Corrective action includes burner tuning, maintenance by service personnel, limitation of unit load, or other action taken to lower emission concentrations. Corrective action shall be pursued until observed emission concentrations no longer exceed 30 ppmvd NO_x or 50 ppmvd CO, corrected to 3% O₂.

(vi) **Reporting requirements.**

- (A) All air quality related complaints received by the owner or operator shall be reported to the Agency within 3 business days of receipt.
- (B) Emission monitoring results for each boiler/heater shall be reported to the Agency within 15 calendar days of completion on forms provided by the Agency.
- (C) The owner or operator of an affected boiler/heater shall report the following information to the Agency no later than March 15th for the preceding calendar year:
 - (I) Quantity of fuel consumed; and
 - (II) Air emissions of criteria air pollutants, VOCs, and toxic air pollutants (TAPs).

Summary Information (by SWCAA) for SUN-061

Battle Ground School District – Prairie High School

Two Hydrotherm KN-20 condensing boilers have been installed in the Boiler Room to replace one Teledyne Laars boiler (serial number C94H07956) used for hydronic heating.

New Boiler Information

Boiler Identification: Main Boiler #1
 Location: Prairie High School Boiler Room - Southwest portion of campus at 11311 NE 119th Street, Vancouver, WA 98662
 Make / Model: Hydrotherm / KN-20
 Serial Number: Identified as 05142405
 Built: Installed new in 2014
 Installed: August / September 2014
 Heat Input Rating: 1.999 MMBtu/hr with 5:1 turndown
 Fuel: Natural gas
 Stack Description: Exhausts above building ~20' above grade and 4' above the building roof

Hydrotherm KN-20 (each)						
Heat Rate				1.999 MMBtu/hr		
Natural Gas Heat Value =				1,020 Btu/scf for AP-42 emission factors		
Natural Gas Heat Value =				1,028 Btu/scf for 40 CFR 98 GHG emission factors		
Fuel Consumption =				17.168 MMscf/yr		
	ppmvd	Emission Factor				
Pollutant	@ 3% O ₂	lb/MMBtu	lb/MMscf	lb/hr	tpy	Emission Factor Source
NO _x	30	0.0364	37.1	7.3E-02	0.32	BACT
CO	50	0.0370	37.7	7.4E-02	0.32	BACT
VOC		0.0054	5.5	1.1E-02	0.047	AP-42 Sec. 1.4 (7/98)
SO _x as SO ₂		0.0006	0.6	1.2E-03	0.005	AP-42 Sec. 1.4 (7/98)
PM		0.0075	7.6	1.5E-02	0.065	AP-42 Sec. 1.4 (7/98)
PM ₁₀		0.0075	7.6	1.5E-02	0.065	AP-42 Sec. 1.4 (7/98)
PM _{2.5}		0.0075	7.6	1.5E-02	0.065	AP-42 Sec. 1.4 (7/98)
Benzene		2.06E-06	0.0021	4.1E-06	1.8E-05	AP-42 Sec. 1.4 (7/98)
Formaldehyde		7.35E-05	0.075	1.5E-04	6.4E-04	AP-42 Sec. 1.4 (7/98)
			CO _{2e}	CO _{2e}		
Greenhouse Gases	kg/MMBtu	GWP	lb/MMBtu	lb/MMscf	tpy, CO _{2e}	
CO ₂	53.02	1	116.89	120,162	1,023	40 CFR 98
CH ₄	0.001	21	0.046	47.59	0.4	40 CFR 98
N ₂ O	0.0001	310	0.068	70.26	0.6	40 CFR 98
Total GHG - CO _{2e}	53.0211		117.004	120,280	1,024	