



July 13, 2017

Mr. David Klemetsrud  
Battle Ground School District  
PO Box 200  
Battle Ground, WA 98604-0200

Subject: Notification of Boiler Installation at Battle Ground High School (SUN – 120)

Dear Mr. Klemetsrud:

The Southwest Clean Air Agency (SWCAA) received your Small Unit Notification (SUN) on August 18, 2016 for installation and operation of a new boiler at the Battle Ground High School, 300 West Main Street, Battle Ground, Washington. Performance monitoring submitted June 29, 2017 indicates this boiler can meet the emission limits in SWCAA 400-072(5)(b). The new boiler replaced a boiler used for domestic hot water production. For administrative and tracking purposes SWCAA has assigned tracking number SUN-120 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) Lochinvar model CFN-0992, natural gas fired boiler with a rated heat input capacity of 0.990 MMBtu/hr.

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(5)(b) "**Small gas fired boilers/heaters**". A copy of the relevant SWCAA 400-072 section is attached for your information. SWCAA 400-072(5)(b)(v) requires that emissions from the unit be tested within 60 days of initial operation and annually thereafter. Because you have other boilers at your facility that require testing, SWCAA hereby approves the utilization of the currently approved testing schedule for Battle Ground School District for all subsequent testing of the new boiler. The currently approved schedule for the Battle Ground School District requires that boiler testing be conducted by the end of March each year.

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, 16-19-009 filed 9/8/16, effective 10/9/16]

### **(5) 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<sub>x</sub> and CO emissions at, or below, 30 ppmv and 50 ppmv, respectively (corrected to 3% O<sub>2</sub>, dry, 1-hr avg). EPA test methods from 40 CFR 60, as in effect on July 1, 2015, shall be used to determine compliance.
  - (iii) **General requirements.**
    - (A) Each boiler/heater shall only be fired on natural gas, propane, or LPG.
  - (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 promptly after 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 than the end of the month in which the original monitoring was conducted. 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<sub>x</sub> or 50 ppmvd CO, corrected to 3% O<sub>2</sub>, the owner or operator shall either perform 60 minutes of additional monitoring to more accurately quantify CO and NO<sub>x</sub> 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<sub>x</sub> or 50 ppmvd CO, corrected to 3% O<sub>2</sub>.

(vi) **Reporting requirements.**

- (A) The owner or operator of an affected emission unit shall provide written notification of initial operation to SWCAA within 10 days of occurrence.
- (B) All air quality related complaints received by the owner or operator shall be reported to the Agency within 3 business days of receipt.
- (C) 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.
- (D) The owner or operator of an affected boiler/heater shall report the following information to the Agency no later than March 15<sup>th</sup> 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-120**

### **Battle Ground School District – Battle Ground High School**

One Lochinvar water heater has been installed in the gym for domestic hot water production. The boiler replaced an A. O. Smith model # DB-1080-S100S Duramax, serial # 95-S-A0042, rated at 1,080,000 Btu, natural gas-fired unit, WA State ID No 40651-99W. Note that there is one other unit in the gym identified in SWCAA's files ("AO Smith – m/n TJV-500A, s/n SH95-58062-Y3, no Btu rating, natural gas-fired, hot water storage"). Mr. David Klemetsrud of Battle Ground School District indicated that this unit is not fired but rather is simply a storage tank for hot water.

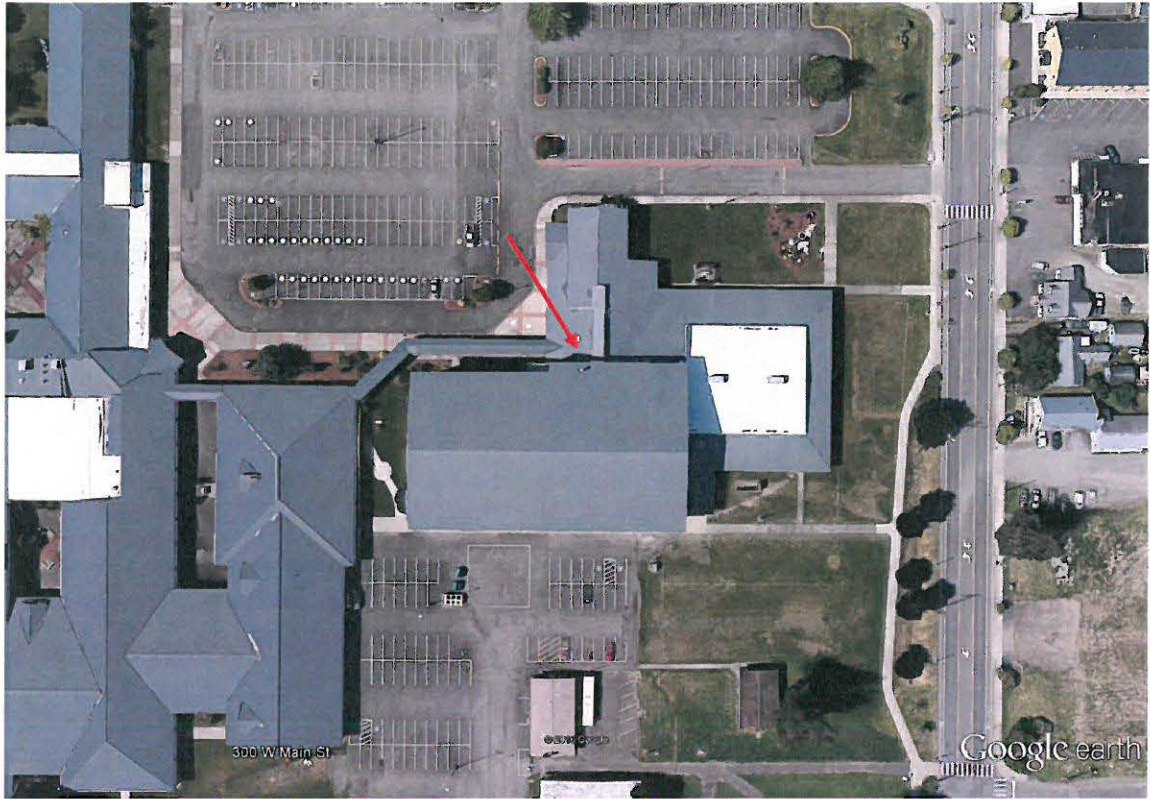
### **New Boiler Information**

Boiler Identification: BGHS Gym Water Heater  
Location: 300 West Main Street, Battle Ground, WA  
Northern portion of the gym building  
Boiler Make/Model: Lochinvar / CFN-0992 (Copper Fin II, 0.990 MMBtu/hr)  
Serial Number: 1627103183307  
Built: Not provided  
Installed: August 2016  
Burner Make/Model: Lochinvar / not specified  
Heat Input Rating: 0.990 MMBtu/hr with 4:1 turndown using proportional firing.  
Fuel: Natural gas  
Stack Description: Discharges vertically above the gym roof, 10" diameter, discharging 50' above grade and 5' above the roof at ~180°F.  
45°46'57.19"N, 122°32'18.75"W

## Potential Emissions

Battle Ground School District - High School Gym Boiler (Lochinvar CFN-0992)						
Heat Rate =		0.990 MMBtu/hr				
Natural Gas Heat Value =		1,020 Btu/scf for AP-42 emission factors				
Natural Gas Heat Value =		1,026 Btu/scf for 40 CFR 98 GHG emission factors				
Fuel Consumption =		8.502 MMscf/yr				
Pollutant	ppmvd @ 3% O <sub>2</sub>	Emission Factor		lb/hr	tpy	Emission Factor Source
NO <sub>x</sub>	30	0.0364	37.1	3.6E-02	0.16	BACT / SUN Limit
CO	50	0.0370	37.7	3.7E-02	0.16	BACT / SUN Limit
VOC		0.0054	5.5	5.3E-03	0.023	AP-42 Sec. 1.4 (7/98)
SO <sub>x</sub> as SO <sub>2</sub>		0.0006	0.6	5.8E-04	0.003	AP-42 Sec. 1.4 (7/98)
PM		0.0075	7.6	7.4E-03	0.032	AP-42 Sec. 1.4 (7/98)
PM <sub>10</sub>		0.0075	7.6	7.4E-03	0.032	AP-42 Sec. 1.4 (7/98)
PM <sub>2.5</sub>		0.0075	7.6	7.4E-03	0.032	AP-42 Sec. 1.4 (7/98)
Benzene		2.06E-06	0.0021	2.0E-06	8.9E-06	AP-42 Sec. 1.4 (7/98)
Formaldehyde		7.35E-05	0.075	7.3E-05	3.2E-04	AP-42 Sec. 1.4 (7/98)
Greenhouse			CO <sub>2</sub> e	CO <sub>2</sub> e		
Gases	kg/MMBtu	GWP	lb/MMBtu	lb/MMscf	tpy, CO <sub>2</sub> e	Emission Factor Source
CO <sub>2</sub>	53.06	1	116.98	120,019	507	40 CFR 98
CH <sub>4</sub>	0.001	25	0.055	56.55	0.2	40 CFR 98
N <sub>2</sub> O	0.0001	298	0.066	67.41	0.3	40 CFR 98
Total GHG	53.0611		117.098	120,143	508	





**Google Earth Image – April 17, 2015**



**Copper-Fin II (Photo from Lochinvar's Website – August 31, 2016)**