

July 19, 2018

Steve Marshall
Camas School District No. 117
841 NE 22nd Ave.
Camas, WA 98607

Subject: Notification of Boiler Installation at Lacamas Lake Elementary School (SUN – 168)

Dear Mr. Marshall:

The Southwest Clean Air Agency (SWCAA) received your Small Unit Notification (SUN) on April 10, 2018 for installation and operation of a boiler at the new Lacamas Lake Elementary School. For administrative and tracking purposes SWCAA has assigned tracking number SUN-168 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) Advanced Thermal Hydronics model KN-16, natural gas fired condensing boiler with a rated heat input capacity of 1.600 MMBtu/hr. The boiler will be identified as "Boiler 1" at Lacamas Lake Elementary School.

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 in your district that require testing, SWCAA hereby approves the utilization of the currently approved testing schedule for the Dorothy Fox and Woodburn elementary schools in Camas School District No. 117 for all subsequent testing of the new boiler. The currently approved schedule for these schools requires that boiler testing be conducted by the end of November 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

cc: Russ Kaufman
Todd Construction
PO Box 949
Tualatin, OR 97062



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; 17-11-078 filed 5/18/17, effective 6/18/17]

(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_x and CO emissions at, or below, 30 ppmv and 50 ppmv, respectively (corrected to 3% O₂, 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_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) 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 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-168, SUN-169

Camas School District – Lacamas Lake Elementary School

This will be a new 73,000 square foot elementary school. The school is scheduled to open in September 2018. The primary emission units will be two boilers used solely for hydronic heating and an emergency generator engine. In addition, three domestic hot water heaters will be installed to provide potable hot water.

New Boiler Information – SUN-168, SUN-169

Boiler Identification: Boiler 1 (B-1) and Boiler 2 (B-2)
Location: Lacamas Lake Elementary School
4825 North Shore Blvd., Camas, WA 98607
(Previous residence on this site with address 1111 NE 232nd Ave.)
Clark County parcel #175724000
Mechanical Room on southwest side of building
Boiler Make/Model: Advance Thermal Hydronics / KN-16
Serial Number: 11847060 (Boiler 1), 11847059 (Boiler 2)
Built: To be determined
Installed: 2018
Burner: Pre-mix metal fiber burner
Heat Input Rating: 1.600 MMBtu/hr with 5:1 turndown
Fuel: Natural gas
Stack Description: Each boiler will discharge through a separate 6" diameter flue that penetrates the roof of the Mechanical Room and exhausts 17' above ground level and 3' above the roof level.

Domestic Hot Water Heaters

Heater Identification: WH-1, WH-2, WH-3
Location: Lacamas Lake Elementary School
4825 North Shore Blvd., Camas, WA 98607
Mechanical Room on southwest side of building
Boiler Make/Model: Bradford White / EF-100T-150E-3N(A)
Serial Number: To be determined
Built: To be determined
Installed: 2018
Burner: Pre-mix down-fired burner
Heat Input Rating: 0.15 MMBtu/hr each
Fuel: Natural gas
Stack Description: Not provided

Potential Emissions

Lacamas Lake Elementary School - SUNs-168, 169 (Boilers 1 and 2) - each boiler						
Heat Rate =				1.600	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 =				13.741	MMscf/yr	
Pollutant	ppmvd	Emission Factor		lb/hr	tpy	Emission Factor Source
	@ 3% O ₂	lb/MMBtu	lb/MMscf			
NO _x	30	0.0364	37.1	5.8E-02	0.26	SWCAA 400-072
CO	50	0.0370	37.7	5.9E-02	0.26	SWCAA 400-072
VOC		0.0054	5.5	8.6E-03	0.038	AP-42 Sec. 1.4 (7/98)
SO _x as SO ₂		0.0006	0.6	9.4E-04	0.004	AP-42 Sec. 1.4 (7/98)
PM		0.0075	7.6	1.2E-02	0.052	AP-42 Sec. 1.4 (7/98)
PM ₁₀		0.0075	7.6	1.2E-02	0.052	AP-42 Sec. 1.4 (7/98)
PM _{2.5}		0.0075	7.6	1.2E-02	0.052	AP-42 Sec. 1.4 (7/98)
Benzene		2.06E-06	0.0021	3.3E-06	1.4E-05	AP-42 Sec. 1.4 (7/98)
Formaldehyde		7.35E-05	0.075	1.2E-04	5.2E-04	AP-42 Sec. 1.4 (7/98)
Greenhouse			CO ₂ e	CO ₂ e		
Gases	kg/MMBtu	GWP	lb/MMBtu	lb/MMscf	tpy, CO ₂ e	Emission Factor Source
CO ₂	53.06	1	116.98	120,019	820	40 CFR 98
CH ₄	0.001	25	0.055	56.55	0.4	40 CFR 98
N ₂ O	0.0001	298	0.066	67.41	0.5	40 CFR 98
Total GHG	53.0611		117.098	120,143	821	