



July 26, 2019

Mike Black
Sonoco Products
1620 Downriver Drive
Woodland, WA 98674

Subject: Notification of Boiler Installation (SUN-207)

Dear Mr. Black:

The Southwest Clean Air Agency (SWCAA) received your Small Unit Notification (SUN) on July 5, 2019 for installation and operation of a new boiler at Sonoco Products' Woodland, Washington facility. For administrative and tracking purposes SWCAA has assigned tracking number SUN-207 to this notification. This notification was filed in accordance with SWCAA 400-072 and applies to the installation of a new boiler to replace the existing Cleaver-Brooks boiler. The new boiler was identified as:

- (1) Hurst model S3-G-30-150, natural gas fired boiler with a heat input capacity of 1.260 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.

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; 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).

Sonoco Products
Summary Information (by SWCAA) for SUN-207

Sonoco Products has proposed to install a natural-gas fired boiler to replace their existing 1.25 MMBtu/hr Cleaver-Brooks model CFV-700-30 that has failed. The boiler will be used to provide heat for "glue cooking".

New Boiler Information

Boiler Identification: Not provided – this is the only boiler at the facility
Location: South end of the building
1620 Downriver Drive
Woodland, WA 98674
Boiler Make/Model: Hurst / S3-G-30-150
Boiler Description: Forced-draft, 3-pass, dry back, firetube boiler
Burner Make / Model: Webster / JBX1-G-05
Burner Description: Forced draft burner with FGR designed to achieve 30 ppm NO_x @ 3% O₂
and 50 ppmvd CO @ 3% O₂.
Serial Number: To be determined
Built: To be determined – will be new
Heat Input Rating: 1.260 MMBtu/hr (boiler). Burner rating is 1.680 MMBtu/hr with FGR.
Fuel: Natural gas
Stack Description: ~10" diameter vertical capped stack, exhausting through the roof ~24'
above ground level, 4' above roof level

Potential Emissions

Sonoco Products						
Heat Rate =	1.260 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 =	10.821 MMscf/yr					
Pollutant	ppmvd @ 3% O ₂	Emission Factor		lb/hr	tpy	Emission Factor Source
		lb/MMBtu	lb/MMscf			
NO _x	30	0.0364	37.1	0.046	0.20	SWCAA 400-072
CO	50	0.0370	37.7	0.047	0.20	SWCAA 400-072
VOC		0.0054	5.5	0.0068	0.030	AP-42 Sec. 1.4 (7/98)
SO _x as SO ₂		0.00059	0.6	0.00074	0.0032	AP-42 Sec. 1.4 (7/98)
PM		0.0075	7.6	0.0094	0.041	AP-42 Sec. 1.4 (7/98)
PM ₁₀		0.0075	7.6	0.0094	0.041	AP-42 Sec. 1.4 (7/98)
PM _{2.5}		0.0075	7.6	0.0094	0.041	AP-42 Sec. 1.4 (7/98)
Benzene		2.06E-06	0.0021	2.6E-06	1.1E-05	AP-42 Sec. 1.4 (7/98)
Formaldehyde		7.35E-05	0.075	9.3E-05	4.1E-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	645.6	40 CFR 98
CH ₄	0.001	25	0.055	56.55	0.3	40 CFR 98
N ₂ O	0.0001	298	0.066	67.41	0.4	40 CFR 98
Total GHG	53.0611		117.098	120,143	646.2	