

July 21, 2020

Mr. Juan Del Moral
Church and Dwight
6350 NE Campus Drive
Ridgefield, WA 98661

Subject: Notification of Boiler Installation at Church and Dwight – Ridgefield – SUN - 241

Dear Mr. Del Moral:

The Southwest Clean Air Agency (SWCAA) received your Small Unit Notification (SUN) on July 14, 2020 for installation and operation of a new boiler at Church and Dwight's Ridgefield facility. For administrative and tracking purposes SWCAA has assigned tracking number SUN-241 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) Columbia Boiler model CT-50, natural gas fired boiler with a rated heat input capacity of 1.68 MMBtu/hr at a gas manifold differential pressure of 2.2 inches water column. The boiler will be identified as "RF Boiler-02".

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 there is another boiler at this facility that requires testing, SWCAA hereby approves the utilization of the currently approved testing schedule for the other boiler for all subsequent testing of the new boiler. The currently approved testing schedule for the other boiler requires that boiler testing be conducted by the end of May each year. **During testing and regular operation the gas manifold differential pressure should not exceed 2.2 inches water column to assure the heat input rating is not exceeded.**

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; 20-06-003 filed 2/19/20, effective 3/21/20]

(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 the date cited in SWCAA 400-025) 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-241
Church and Dwight - Ridgefield
July 21, 2020**

A second Columbia boiler, model CT-50, will be installed to provide steam for shrink wrapping plastic around bottles containing product.

New Boiler Information

Boiler Identification: RF Boiler-02
Boiler Location: Along the south side of the main building
Boiler Make/Model: Columbia Boiler / CT-50
Serial Number: 165327
Installed: July 2020
Built: 2020
Burner Make/Model: ST Johnson / NMV-4F
Burner Description: Surface combustion burner with 5:1 turndown. This burner is advertised capable of <9 ppm NO_x @ 3% O₂.
Heat Input Rating: 1.68 MMBtu/hr. This heat input rating is based on a burner gas manifold differential pressure of 2.2 inches water column (simply referred to as "gas manifold pressure" in literature and the Engineering Data Sheet). Higher pressures would result in higher firing rates. The burner itself can achieve 2.5 MMBtu/hr at a gas manifold differential pressure of 5.0 inches water column. A table of gas manifold differential pressures vs. firing rate can be found on Page 3-6 of the Installation and Operation Manual.
Fuel: Natural gas
Stack Description: Discharging vertically through the roof with 12" diameter stack, ~3' above roof, ~14' above ground level.

Potential Emissions

Church and Dwight - Columbia Steam Boiler 2						
Heat Rate =	1.680 MMBtu/hr at gas manifold dP of 2.2" w.c.					
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 =	14.428 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	0.061	0.27	SWCAA 400-072
CO	50	0.0370	37.7	0.062	0.27	SWCAA 400-072
VOC		0.0054	5.5	0.0091	0.040	AP-42 Sec. 1.4 (7/98)
SO _x as SO ₂		0.00059	0.6	0.00099	0.0043	AP-42 Sec. 1.4 (7/98)
PM		0.0075	7.6	0.0125	0.055	AP-42 Sec. 1.4 (7/98)
PM ₁₀		0.0075	7.6	0.0125	0.055	AP-42 Sec. 1.4 (7/98)
PM _{2.5}		0.0075	7.6	0.0125	0.055	AP-42 Sec. 1.4 (7/98)
Benzene		2.06E-06	0.0021	3.5E-06	1.5E-05	AP-42 Sec. 1.4 (7/98)
Formaldehyde		7.35E-05	0.075	1.2E-04	5.4E-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	860.8	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 - CO ₂ e			117.098	120,143	861.7	