



January 30, 2018

Mr. Sven Larsson, Project Engineer  
Rotschy, Inc.  
9210 NE 62<sup>nd</sup> Ave  
Vancouver, WA 98665

Subject: Final Air Discharge Permit / Nonroad Engine Permit for New Crusher and Screens

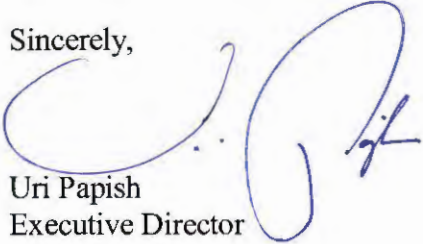
Dear Mr. Larsson:

A final determination to issue Air Discharge Permit / Nonroad Engine Permit 18-3263 (ADP/NEP 18-3263) has been completed for ADP/NEP Application CL-3034 pursuant to Section 400-110(4) of the General Regulations for Air Pollution Sources of the Southwest Clean Air Agency (SWCAA). Public notice for ADP Application CL-3034 was published in the permit section of SWCAA's internet website on January 10, 2018. SWCAA did not receive a request for a public comment period in response to the public notice, and has concluded that significant public interest does not exist for this determination. Therefore, a public comment period will not be provided for this permitting action. Electronic copies of ADP 18-3263 and the associated Technical Support Document are available for public review in the permit section of SWCAA's internet website (<http://www.swcleanair.org/permits/adpfinal.asp>). Original copies are enclosed for your files.

This Air Discharge Permit may be appealed directly to the Pollution Control Hearings Board (PCHB) at P.O. Box 40903, Olympia, Washington 98504-0903 within 30 days of receipt as provided in RCW 43.21B.

If you have any comments, or desire additional information, please contact me or Wess Safford at (360) 574-3058, extension 126.

Sincerely,

  
Uri Papish  
Executive Director

UP:wls  
Attachment



**SOUTHWEST CLEAN AIR AGENCY**

**AIR DISCHARGE PERMIT / NONROAD ENGINE PERMIT  
18-3263**

**Final Date: January 30, 2018**

Facility Name: Rotschy, Inc.  
Physical Location: 913 NE 172<sup>nd</sup> Avenue  
Vancouver, WA 98665

SWCAA ID: 2435

REVIEWED BY:

  
Paul T. Mairose, Chief Engineer



APPROVED BY:

  
Uri Papish, Executive Director

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**1. Equipment/Activity Identification**

<b>ID No.</b>	<b>Generating Equipment/Activity</b>	<b># of Units</b>	<b>Control Measure/Equipment</b>	<b># of Units</b>
1	Parker Jaw Crusher	1	High pressure wet suppression at crusher entrance	N/A
2	Komatsu Impact Crusher #30-16	1	High pressure wet suppression at crusher entrance	N/A
3	McCloskey Screen #30-10	1	High pressure wet suppression at screen deck	N/A
4	McCloskey Screen #30-12	1	High pressure wet suppression at screen deck	N/A
5	McCloskey Screen #30-13	1	High pressure wet suppression at screen deck	N/A
6	MGL Stacking Conveyor #30-15	1	Wet suppression	N/A
7	Haul Roads and Conveyors	1	Wet suppression	N/A
8	Engine - Whisperwatt Generator (stationary) (John Deere - 150 hp)	1	Ultra-low sulfur diesel, EPA Tier 2 Certification	N/A
9	Engine - Parker Jaw Crusher (nonroad) (Caterpillar - 362 hp)	1	Ultra-low sulfur diesel, EPA Tier 1 Certification	N/A
10	Engine - Komatsu Impact Crusher (nonroad) (Komatsu - 322 hp)	1	Ultra-low sulfur diesel, EPA Tier 2 Certification	N/A
11	Engine - McCloskey Screen #30-10 (nonroad) (Caterpillar - 127 hp)	1	Ultra-low sulfur diesel, EPA Tier 4 Certification	N/A
12	Engine - McCloskey Screen #30-12 (nonroad) (Caterpillar - 129 hp)	1	Ultra-low sulfur diesel, EPA Tier 3 Certification	N/A
13	Engine - McCloskey Screen #30-13 (nonroad) (Caterpillar - 129 hp)	1	Ultra-low sulfur diesel, EPA Tier 3 Certification	N/A
14	Engine - MGL Stacking Conveyor (nonroad) (Caterpillar - 73 hp)	1	Ultra-low sulfur diesel, EPA Tier 4 Certification	N/A

**2. Approval Conditions**

The following tables detail the specific requirements of this permit. In addition to the requirements listed below, equipment at this facility may be subject to other federal, state, and local regulations. The permit requirement number is identified in the left hand column. The text of the permit requirement is contained in the middle column. The emission unit, equipment, or activity to which the permit requirement applies is listed in the right hand column.

This Permit supersedes ADP/NEP 16-3183 in its entirety.

**2.1 Emission Limits**

No.	Emission Limits	Equipment/ Activity								
1.	<p>Emissions from crushing and screening operations (crushing, screening and haul roads) shall not exceed:</p> <table border="0" data-bbox="256 346 727 493"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>PM</td> <td>4.04 tpy</td> </tr> <tr> <td>PM<sub>10</sub></td> <td>1.10 tpy</td> </tr> <tr> <td>PM<sub>2.5</sub></td> <td>0.17 tpy</td> </tr> </tbody> </table> <p>Annual emissions shall be calculated from actual material throughput and handling consistent with the methodology in Section 6 of the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM	4.04 tpy	PM <sub>10</sub>	1.10 tpy	PM <sub>2.5</sub>	0.17 tpy	1-7
<u>Pollutant</u>	<u>Emission Limit</u>									
PM	4.04 tpy									
PM <sub>10</sub>	1.10 tpy									
PM <sub>2.5</sub>	0.17 tpy									
2.	Visible emissions from crushing, screening, and conveying equipment shall not exceed 0% opacity for more than 3 minutes in any one hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).	1-6								
3.	Visible emissions from haul roads shall not exceed 20% opacity for more than 3 minutes in any one hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).	7								
4.	<p>Emissions from the Whisperwatt Generator Engine shall not exceed:</p> <table border="0" data-bbox="196 982 748 1129"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>NO<sub>x</sub></td> <td>1.55 tpy</td> </tr> <tr> <td>CO</td> <td>0.27 tpy</td> </tr> <tr> <td>PM<sub>10</sub></td> <td>0.06 tpy</td> </tr> </tbody> </table> <p>Annual emissions shall be calculated from actual operation consistent with the methodology in Section 6 of the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO <sub>x</sub>	1.55 tpy	CO	0.27 tpy	PM <sub>10</sub>	0.06 tpy	8
<u>Pollutant</u>	<u>Emission Limit</u>									
NO <sub>x</sub>	1.55 tpy									
CO	0.27 tpy									
PM <sub>10</sub>	0.06 tpy									
5.	<p>Visible emissions from diesel engines operating in support of crushing and screening operations shall not exceed 5% opacity for more than 3 minutes in any one hour period as determined in accordance with SWCAA Method 9, except during periods of startup.</p> <p>For the purposes of this requirement, a startup period ends when the earlier of the following operating events occurs:</p> <ul style="list-style-type: none"> <li>(a) The engine has reached normal operating temperature; or</li> <li>(b) The engine has been operating for 15 minutes.</li> </ul>	8-14								

**2.2 Operating Limits and Requirements**

No.	Operating Limits and Requirements	Equipment/ Activity
6.	Reasonable precautions shall be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facilitywide
7.	The permittee shall use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facilitywide

No.	Operating Limits and Requirements	Equipment/ Activity
8.	Material handling points including, but not limited to, conveyor transfer points, aggregate storage piles, and haul roads shall be watered as necessary to control fugitive dust emissions.	Facilitywide
9.	Emission units identified in this Permit shall be maintained and operated in total and continuous conformity with the conditions identified in this Permit. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this Permit, including directing the facility to cease operations until corrective action can be completed.	1-14
10.	The permittee shall notify SWCAA at least 10 business days in advance of relocating approved equipment and shall submit operational information (production quantities, hours of operation, location of nearest neighbor, etc.) sufficient to demonstrate that the proposed operation will comply with the emission standards for a new source, and will not cause a violation of applicable ambient air quality standards, and if in a nonattainment area, will not interfere with scheduled attainment of ambient standards.	1-14
11.	Each rock crusher and aggregate screen shall be equipped with a high pressure water spray system or other wet suppression system reviewed and approved by SWCAA to provide equivalent or superior control of particulate matter emissions. Each high pressure spray system shall be capable of maintaining an operating pressure of 80 psig or greater and shall maintain 80 psig or greater during operation. A functional pressure gauge shall be maintained onsite and a connection point provided for the purpose of demonstrating compliance with the minimum pressure requirement for high pressure spray systems.	1-5
12.	Each pollution control device (e.g. water spray or fog systems) shall be operated whenever the processing equipment served by that control device is in operation. Control devices shall be operated and maintained in accordance with the manufacturer's specifications. Furthermore, control devices shall be operated in a manner that minimizes emissions.	1-5
13.	Spray/fog nozzles in the water spray systems for each rock crusher and aggregate screen shall be visually inspected once per week when in operation to ensure proper function. Clogged or defective nozzles shall be replaced or repaired prior to subsequent operation.	1-5
14.	Additional wet suppression shall be provided as necessary to control fugitive dust from haul roads, crushing, screening, and material handling equipment in the event that process changes or weather patterns result in insufficient water application to control fugitive dust from plant operations.	1-7
15.	Operation of the Whisperwatt Generator Engine shall not exceed 2,000 hours per year.	8
16.	Diesel engines operating in support of crushing and screening operations shall only be fired on #2 diesel or better. The sulfur content of the fuel fired in the diesel engines shall not exceed 0.0015% by weight (15 ppm). A fuel certification from the fuel supplier or test results using an appropriate method listed in 40 CFR 60.17 may be used to comply with this requirement.	8-14
17.	Each diesel engine operating in support of crushing and screening operations shall be equipped with a nonresettable time totalizer to measure the number of hours each engine operates.	8-14

**2.3 Monitoring and Recordkeeping Requirements**

No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity
18.	All records required by this Permit shall be kept for a minimum period of no less than three years and shall be maintained in a form readily available for inspection by SWCAA representatives.	1-14
19.	With the exception of data logged by a computerized data acquisition system, each record required by this Air Discharge Permit shall include the date and the name of the person making the record entry.	1-14
20.	Excess emissions and upset conditions shall be recorded for each occurrence.	1-14
21.	<p>Crushing and screening operations shall be monitored and recorded as follows:</p> <p>(a) Quantity and size of material throughput      Recorded monthly for each worksite;</p> <p>(b) Hours of engine operation                              Recorded annually for each diesel engine;</p> <p>(c) Visual inspection of spray/fog nozzles              Recorded for each occurrence;</p> <p>(d) Maintenance of spray/fog nozzles                      Recorded for each occurrence;</p> <p>(e) Date and location of equipment relocation              Recorded for each occurrence.</p> <p>(f) Air quality related complaints                              Recorded for each occurrence; and</p> <p>(g) Fuel sulfur content of diesel engine fuel              Recorded for each fuel delivery. Fuel certification from the fuel supplier may be used to demonstrate compliance.</p>	1-14

**2.4 Emission Monitoring and Testing Requirements**

No.	Emission Monitoring and Testing Requirements	Equipment/ Activity
22.	An initial emissions test shall be conducted for all rock crushing equipment listed in this Permit subject to Subpart OOO that has not been previously tested. Emissions testing shall be conducted within 60 days after permit issuance pursuant to Appendix A of this Permit and the requirements of 40 CFR 60, Subpart OOO "Standards of Performance for Nonmetallic Mineral Processing Plants."	1-6

**2.5 Reporting Requirements**

No.	Reporting Requirements	Equipment/ Activity
23.	All air quality related complaints, including dust complaints, received by the permittee shall be reported to SWCAA within three days of receipt.	Facilitywide

No.	Reporting Requirements	Equipment/ Activity
24.	<p>Excess emissions shall be reported to SWCAA as follows:</p> <ul style="list-style-type: none"> <li>• As soon as possible, but no later than 12 hours after discovery for emissions that represent a potential threat to human health or safety;</li> <li>• As soon as possible, but no later than 48 hours after discovery for emissions which the permittee wishes to claim as unavoidable pursuant to SWCAA 400-107(1); and</li> <li>• No later than 30 days after the end of the month of discovery for all other excess emissions.</li> </ul>	Facilitywide
25.	<p>An annual emissions inventory report shall be submitted in accordance with SWCAA 400-105(1). In addition to the emissions information required under SWCAA 400-105(1), each annual report shall include an estimate of annual emission quantities for each TAP compound listed in the Technical Support Document for this Permit.</p>	1-14
26.	<p>The following emission-related information shall be reported to SWCAA by March 15<sup>th</sup> for the previous calendar year:</p> <ol style="list-style-type: none"> <li>(a) Quantity and size of material crushed at each location;</li> <li>(b) Quantity and type of material screened at each location;</li> <li>(c) Average length of unpaved haul road controlled by the permittee at each location;</li> <li>(d) Hours of engine operation for each diesel engine used in support of crushing and screening operations; and</li> <li>(e) Quantity of air pollutant emissions from approved operations.</li> </ol>	1-14
27.	<p>Emission test results shall be reported to SWCAA in writing within 45 days of test completion.</p>	1-6

### 3. General Provisions

No.	General Provisions
A.	<p>For the purpose of ensuring compliance with this Permit, duly authorized representatives of the Southwest Clean Air Agency must be permitted access to the permittee's premises and the facilities being constructed, owned, operated and/or maintained by the permittee for the purpose of inspecting said facilities. These inspections are required to determine the status of compliance with this Permit and applicable regulations and to perform or require such tests as may be deemed necessary.</p>
B.	<p>The provisions, terms and conditions of this Permit bind the permittee, its officers, directors, agents, servants, employees, successors and assigns, and all persons, firms, and corporations acting under or for the permittee.</p>
C.	<p>The requirements of this Permit survive any transfer of ownership of the source or any portion thereof.</p>
D.	<p>This Permit must be posted conspicuously at or be readily available near the source.</p>
E.	<p>This Permit will be invalid if construction has not commenced within eighteen (18) months from date of issuance, if construction is discontinued for a period of eighteen (18) months or more, or if construction is not completed within a reasonable time.</p>
F.	<p>This Permit does not supersede requirements of other Agencies with jurisdiction and further, this Permit does not relieve the permittee of any requirements of any other governmental Agency. In addition to this Permit, the permittee may be required to obtain permits or approvals from other agencies with jurisdiction.</p>



No.	General Provisions
G.	Compliance with the terms of this Permit does not relieve the permittee from the responsibility of compliance with SWCAA General Regulations for Air Pollution Sources, previously issued Regulatory Orders, RCW 70.94, Title 173 WAC or any other applicable emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply.
H.	If any provision of this Permit is held to be invalid, all unaffected provisions of the Permit will remain in effect and be enforceable.
I.	No change in this Permit will be made or be effective except as may be specifically set forth by written order of the Southwest Clean Air Agency upon written application by the permittee for the relief sought.
J.	The Southwest Clean Air Agency may, in accordance with RCW 70.94 impose such conditions as are reasonably necessary to assure the maintenance of compliance with the terms of this Permit, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act.

**ADP/NEP 18-3263 - Appendix A**  
**Emission Testing Requirements**  
**Rock Crushers / Aggregate Screens**

**1. Introduction:**

- a. The purpose of this emission testing requirement is to demonstrate compliance with the visual emissions limitations of this Permit and 40 CFR 60, Subpart OOO "Standards of Performance for Nonmetallic Mineral Processing Plants."

**2. Testing Requirements:**

- a. An initial emissions test shall be conducted for all rock crushing equipment listed in this Permit subject to Subpart OOO that has not been previously tested pursuant to 40 CFR 60.8 and 60.675. Emissions testing shall be conducted within 60 days after permit issuance. If an affected unit is not in SWCAA's jurisdiction within this time frame or leaves SWCAA's jurisdiction within this time frame, the emission testing shall be conducted within 60 days of coming into, or returning to, SWCAA's jurisdiction.
- b. A comprehensive test plan shall be submitted to SWCAA for review and approval a minimum of 10 business days prior to testing.
- c. SWCAA personnel shall be informed of the proposed test date and location at least 5 business days prior to testing so that a representative may be present during testing.
- d. Testing shall include all constituents identified below. The identified sampling methods shall be used unless alternate methods are approved by SWCAA in advance of the emission testing. A minimum of 30 minutes of observations shall be conducted as required by 40 CFR 60.675(c)(3).

Constituents to be measured:

- (1) Opacity of visible emissions

Test Methods or Equivalent:

EPA Method 9

e. Process Points to Be Tested:

- (1) Affected rock crushers and aggregate screens; and
- (2) Each conveyor transfer point associated with affected emission units.

- f. Opacity observation data shall be reduced and analyzed using the protocols in EPA Method 9 and SWCAA Method 9. Compliance shall be determined by comparing the reduced opacity data with the visible emission limits contained in this Permit and the New Source Performance Standard for Nonmetallic Mineral Processing Plants (40 CFR 60.670 et seq. (Subpart OOO)).

**3. Source Operation:**

- a. A complete record of production related parameters including production rate, size of product being processed, startups, shutdowns, and adjustments shall be kept during emissions testing to correlate operations with emissions and shall be recorded in the test results report.
- b. Source operations during the emissions test must be representative of maximum intended operating conditions.

**ADP/NEP 18-3263 - Appendix A**  
**Emission Testing Requirements**  
**Rock Crushers / Aggregate Screens**

**4. Reporting Requirements:**

- a. A final emission test report shall be prepared and submitted to SWCAA within 45 calendar days of test completion. Unless otherwise directed by SWCAA, a single hard copy of the report and an electronic copy (e.g. Adobe format) of the report shall be submitted to each agency. Each report shall include:
  - (1) A description of the source including manufacturer, model number and design capacity of the equipment, and the location of the sample ports or test locations;
  - (2) Time and date of the test and identification and qualifications of the personnel involved;
  - (3) A summary of results, reported in units and averaging periods consistent with the applicable emission standard or limit;
  - (4) A summary of control system or equipment operating conditions;
  - (5) A summary of production related parameters;
  - (6) A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation;
  - (7) A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation;
  - (8) Copies of field data and example calculations;
  - (9) Chain of custody information;
  - (10) Discussion of any abnormalities associated with the results; and
  - (11) A statement signed by the senior management official of the testing firm certifying the validity of the source test report.



**State Environmental Policy Act**

**DETERMINATION OF NONSIGNIFICANCE (DNS) – SWCAA 18-005**

**Description of proposal:**

ADP Application CL-3034: Proponent proposes to add four pieces of portable, diesel engine powered equipment (crusher, screens, stacking conveyor) to an existing aggregate processing facility. Overall facility throughput will remain the same. Addition of the new equipment will not change the nature of existing operations, and is consistent with existing land zoning. Impact on all media other than air is expected to be the same as existing operations. Impact on air will be minimized through the use of best management practices and wet suppression systems. Facility operations are being conducted in accordance with a Surface Mining Reclamation Permit issued by the Washington Department of Natural Resources (Permit No. 70-010403).

**Proponent:** Rotschy, Inc. (Sven Larsson, Project Engineer)

**Location of proposal, including street address if any:**

913 NE 172<sup>nd</sup> Avenue in Vancouver, Washington 98665

**Lead agency:** Southwest Clean Air Agency

The lead agency for this proposal has determined that it does not have a probable significant impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.

- There is no comment period for this DNS.
- This DNS is issued after using the optional DNS process in WAC 197-11-355. There is no further comment period in the DNS.
- This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 15 days from the date below. Comments must be submitted by \_\_\_\_\_.

**Responsible official:** Paul T. Mairose, P.E.

**Position/title:** Chief Engineer

**Address:** Southwest Clean Air Agency  
11815 NE 99<sup>th</sup> St, Suite 1294  
Vancouver, WA 98682-2322

**Phone:** (360) 574-3058, ext 130

Signature: Paul T. Mairose

Date: 1/30/18

