

March 27, 2024

Mr. Randy Barnes, Operations Supervisor
Camas School District #117
841 NE 22nd Avenue
Camas, WA 98607

Subject: Final Air Discharge Permit for Riello Replacement Boilers

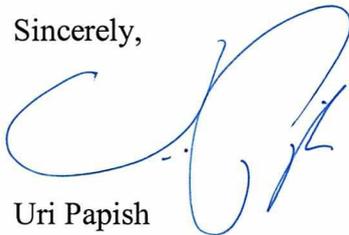
Dear Mr. Barnes:

A final determination to issue Air Discharge Permit 24-3637 (ADP 24-3637) has been completed for Air Discharge Permit (ADP) Application CL-3260 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-3260 was published in the permit section of SWCAA's internet website on February 14, 2024. 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 24-3637 and the associated Technical Support Document are available for public review in the permit section of SWCAA's internet website (<http://www.swcleanair.gov/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) 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

Enclosure – Air Discharge Permit 24-3637 and Technical Support Document





SWCAA
Southwest Clean Air Agency

**AIR DISCHARGE PERMIT
24-3637**

Issued: March 27, 2024

Camas School District – Skyridge Middle School
5220 NW Parker Street, Camas, WA 98607

SWCAA ID - 242

REVIEWED BY:


Clinton Lamoreaux, Chief Engineer



APPROVED BY:

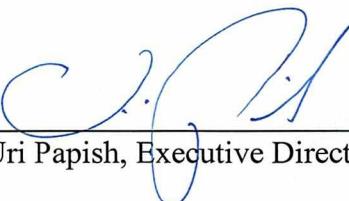

Uri Papish, Executive Director

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1. Equipment/Activity Identification

ID No.	Equipment/Activity	Control Measure/Equipment
1	Water Heaters (0.57 MMBtu/hr, combined)	Low Sulfur Fuel (Nat Gas)
2	Boiler #1 (Riello - 3.0 MMBtu/hr)	Low NO _x Burner, Low Sulfur Fuel (Nat Gas)
3	Boiler #2 (Riello - 3.0 MMBtu/hr)	Low NO _x Burner, Low Sulfur Fuel (Nat Gas)

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.

Emission Limits

Req. No.	Emission Limits	Equipment/Activity ID No.								
1.	<p>Combined emissions from the Riello boilers must not exceed the following:</p> <table border="0"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>NO_x</td> <td>0.95 tpy, 30 ppmvd @ 3% O₂ (1-hr avg)</td> </tr> <tr> <td>CO</td> <td>0.97 tpy, 50 ppmvd @ 3% O₂ (1-hr avg)</td> </tr> <tr> <td>PM₁₀</td> <td>0.20 tpy</td> </tr> </tbody> </table> <p>Annual emissions must be calculated from actual fuel consumption consistent with the methodology in Section 6 of the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO _x	0.95 tpy, 30 ppmvd @ 3% O ₂ (1-hr avg)	CO	0.97 tpy, 50 ppmvd @ 3% O ₂ (1-hr avg)	PM ₁₀	0.20 tpy	2-3
<u>Pollutant</u>	<u>Emission Limit</u>									
NO _x	0.95 tpy, 30 ppmvd @ 3% O ₂ (1-hr avg)									
CO	0.97 tpy, 50 ppmvd @ 3% O ₂ (1-hr avg)									
PM ₁₀	0.20 tpy									
2.	Visible emissions from approved equipment must not exceed 0% opacity for more than 3 minutes in any one hour period as determined by a Certified Observer certified in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).	1-3								

Operating Limits and Requirements

Req. No.	Operating Limits and Requirements	Equipment/Activity ID No.
3.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
4.	The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facility-wide

Emission Monitoring and Testing Requirements

Req. No.	Emission Monitoring and Testing Requirements	Equipment/ Activity ID No.
14.	The permittee must conduct initial and periodic emission monitoring of the Riello boilers as described in Appendix A of this Permit.	2-3

Reporting Requirements

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
15.	All air quality related complaints received by the permittee must be reported to SWCAA within three days of receipt. Complaint reports must include the following information: (a) Date and time of the complaint; (b) Name of the complainant; (c) Nature of the complaint; and (d) Description of corrective action taken in response to complaint (if any).	Facility-wide
16.	Excess emissions must be reported to SWCAA as follows: (a) As soon as possible, but no later than 12 hours after discovery for emissions that represent a potential threat to human health or safety; (b) 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; and (c) No later than 30 days after the end of the month of discovery for all other excess emissions.	1-3
17.	The following emission-related information must be reported to SWCAA by March 15 th for the previous calendar year: (a) Fuel consumption; and (b) Quantity of air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs).	1-3
18.	Emission monitoring results must be reported to SWCAA in writing within 15 days of completion.	2-3
19.	Initial start-up of the Riello boilers must be reported to SWCAA in writing within 10 days of occurrence.	2-3

3. General Provisions

Req. No.	General Provisions
A.	For the purpose of ensuring compliance with this ADP, 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 ADP and applicable regulations and to perform or require such tests as may be deemed necessary.

Req. No.	General Provisions
B.	The provisions, terms, and conditions of this ADP bind the Permittee, its officers, directors, agents, servants, employees, successors and assigns, and all persons, firms, and corporations acting under or for the Permittee.
C.	The requirements of this ADP survive any transfer of ownership of the source or any portion thereof.
D.	This ADP must be posted conspicuously at or be readily available near the source.
E.	This ADP will be invalidated, in whole or in part, if construction or installation of any new or modified equipment has not commenced within eighteen (18) months from date of issuance, if construction is discontinued for a period of eighteen (18) months or more without prior SWCAA approval, or if construction is not completed within a reasonable time.
F.	This ADP does not supersede requirements of other Agencies with jurisdiction and further, this ADP does not relieve the Permittee of any requirements of any other governmental Agency. In addition to this ADP, the Permittee may be required to obtain permits or approvals from other agencies with jurisdiction.
G.	Compliance with the terms of this ADP does not relieve the Permittee from the responsibility of compliance with SWCAA General Regulations for Air Pollution Sources, previously issued Regulatory Orders, RCW 70A.15, 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 ADP is held to be invalid, all unaffected provisions of the ADP will remain in effect and be enforceable.
I.	No change in this ADP 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 70A.15, impose such conditions as are reasonably necessary to assure the maintenance of compliance with the terms of this ADP, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act.

Appendix A

Emission Monitoring Requirements

Riello Boilers

1. Introduction:

The purpose of periodically monitoring boiler exhaust is to minimize emissions and provide a reasonable assurance of proper operation. Periodic monitoring may be conducted with an electrochemical cell combustion analyzer, analyzers used for reference method testing, or other analyzers pre-approved by SWCAA.

2. Monitoring Procedure:

- a. Monitoring of exhaust gases to determine emission concentrations of the constituents listed below must be conducted within 90 days of commencing operation. Subsequent emission monitoring must be conducted on a continuing 12 month cycle, no later than the end of February each year. If a unit is not operated in a month during which performance monitoring is due, performance monitoring of that unit must be conducted no later than the end of the calendar month in which it is next operated.

Constituents to be Measured:

Nitrogen Oxides (NO_x)

Carbon Monoxide (CO)

Oxygen (O₂)

Stack temperature

- b. Source operation during testing must be representative of maximum intended operating conditions.
- c. Alternative testing methodologies must be pre-approved by SWCAA.

3. Minimum Quality Assurance/Quality Control Measures:

- a. The analyzer(s) response to span gas of a known concentration must be determined before and after testing. No more than 12 hours may elapse between span gas response checks. The results of the analyzer response must not be valid if the difference between the pre and post response check results vary by more than 10% of the initial span gas value.
- b. Span gas concentrations must be no less than 50% and no more than 200% of the emission concentration of the corresponding permitted emission limit. A lower concentration span gas may be used if it is more representative of actual measured concentrations. Ambient air may be used to zero the CO and NO_x cells/analyzer(s) and span the oxygen cell/analyzer.
- c. Sampling must consist of at least 1 test consisting of at least 5 minutes of data collection. Data must not be collected until after analyzer readings have stabilized (less than 5% per minute change in emission concentration). Emission concentrations must be recorded at least once every 30 seconds during the data collection phase for a minimum of 10 readings. All test data collected following the ramp-up phase(s) must be reported to SWCAA in the designated format.

4. Reporting:

- a. All monitoring results must be recorded at the facility and reported to SWCAA in writing in a format designated by the Agency. Results must be reported within 15 calendar days of monitoring completion. At a minimum, the following information must be included in the report:
- (1) Time and date of the performance monitoring;
 - (2) Identification of the personnel involved;
 - (3) Identification of the affected unit;
 - (4) A summary of results (NO_x, CO, O₂, etc), reported in units consistent with the applicable emission standard or limit;
 - (5) A summary of equipment operating conditions (e.g., firing rate, fuel flow, stack temperature, etc);
 - (6) A description of the evaluation methods or procedures used including all field data, quality assurance/quality control procedures and documentation;
 - (7) Copies of span gas documentation; and
 - (8) Analyzer response check documentation.
- b. Individual monitoring results must be reported as read. Final average monitoring results must be reported corrected to 3% O₂ and adjusted to reflect analyzer response to the zero and span gases (bias/drift adjustment).

5. Changes to Monitoring Requirements:

Emission monitoring must be conducted as specified in the sections above. The Permittee may submit a written request to SWCAA for approval of minor modifications to the requirements above or the monitoring schedule. Upon review of the request and in accordance with EPA delegation, SWCAA will inform the Permittee in writing of any approved modifications.