



TECHNICAL SUPPORT DOCUMENT

**Air Discharge Permit ADP 24-3637
Air Discharge Permit Application CL-3260**

Issued: March 27, 2024

Camas School District - Skyridge Middle School

SWCAA ID - 242

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ABBREVIATIONS

List of Acronyms

ADP	Air Discharge Permit	NOV	Notice of Violation/
AP-42	Compilation of Emission Factors, AP-42, 5th Edition, Volume 1, Stationary Point and Area Sources – published by EPA	PSD	Prevention of Significant Deterioration
ASIL	Acceptable Source Impact Level	RCW	Revised Code of Washington
BACT	Best available control technology	SCC	Source Classification Code
CAM	Compliance Assurance Monitoring	SDS	Safety Data Sheet
CAS#	Chemical Abstracts Service registry number	SQER	Small Quantity Emission Rate listed in WAC 173-460
CFR	Code of Federal Regulations	Standard	Standard conditions at a temperature of 68°F (20°C) and a pressure of 29.92 in Hg (760 mm Hg)
EPA	U.S. Environmental Protection Agency	SWCAA	Southwest Clean Air Agency
EU	Emission Unit	T-BACT	Best Available Control Technology for toxic air pollutants
mfr	Manufacturer	WAC	Washington Administrative Code

List of Units and Measures

acfm	Actual cubic foot per minute	ppmv	Parts per million by volume
dscfm	Dry Standard cubic foot per minute	ppmvd	Parts per million by volume, dry
gr/dscf	Grain per dry standard cubic foot	ppmw	Parts per million by weight
MMBtu	Million British thermal unit	scfm	Standard cubic foot per minute
MMcf	Million cubic feet	tpy	Tons per year
ppm	Parts per million		

List of Chemical Symbols, Formulas, and Pollutants

CO	Carbon monoxide	PM	Particulate Matter with an aerodynamic diameter 100 µm or less
CO ₂	Carbon dioxide	PM ₁₀	PM with an aerodynamic diameter 10 µm or less
CO _{2e}	Carbon dioxide equivalent	PM _{2.5}	PM with an aerodynamic diameter 2.5 µm or less
H ₂ S	Hydrogen sulfide	SO ₂	Sulfur dioxide
HAP	Hazardous air pollutant listed pursuant to Section 112 of the Federal Clean Air Act	TAP	Toxic air pollutant pursuant to Chapter 173-460 WAC
NO _x	Nitrogen oxides	VOC	Volatile organic compound
O ₂	Oxygen		
O ₃	Ozone		

Terms not otherwise defined have the meaning assigned to them in the referenced regulations or the dictionary definition, as appropriate.

1. FACILITY IDENTIFICATION

Applicant Name: Camas School District #117
 Applicant Address: 841 NE 22nd Avenue, Camas, Washington 98607

Facility Name: Skyridge Middle School
 Facility Address: 5220 NW Parker Street, Camas, Washington 98607

SWCAA Identification: 242

Contact Person: Randy Barnes, Operations Supervisor

Primary Process: Elementary and Secondary Schools
 SIC/NAICS Code: 8211 / Elementary and Secondary Schools
 61111 / Elementary and Secondary Schools

Facility Classification: Natural Minor

2. FACILITY DESCRIPTION

Camas School District #117 (Camas SD) is the public primary education provider for Camas, Washington. This permitting action affects the Skyridge Middle School campus.

3. CURRENT PERMITTING ACTION

This permitting action is in response to Air Discharge Permit application number CL-3260 (ADP Application CL-3260) dated January 31, 2024. Camas SD submitted ADP Application CL-3260 requesting approval of the following:

- Installation of two new Riello AR 3000 hot water boilers.
- Removal of two existing Bryan RV500-W-DG hot water boilers.

The current permitting action provides approval for boiler replacement as proposed in ADP Application CL-3260. This is the initial permitting action for this facility.

4. PROCESS DESCRIPTION

- 4.a. Space Heating. Multiple package boilers are used to provide hot water to hydronic space heating systems at the school campus. The boilers will typically operate less than one quarter of the year.
- 4.b. Domestic Hot Water. Multiple water heaters are used to provide domestic hot water at the school campus.

5. EQUIPMENT/ACTIVITY IDENTIFICATION

- 5.a. Water Heaters (existing). Multiple natural gas fired water heaters are used to supply domestic hot water at various locations on the school campus. Individual units are described as follows:

<u>Make / Model</u>	<u>Rated Heat Input</u>	<u>Mfg Date</u>
Lochinvar Shield/SNA-286-125 (s/n 1743107928296)	0.285 MMBtu/hr	2017
Lochinvar Shield/SNA-286-125 (s/n 1743107928295)	0.285 MMBtu/hr	2017

- 5.b. Boiler #1 (new). One natural gas fired hot water boiler operated in support of a hydronic heating system. The boiler is described as follows:

Boiler Make / Model: Riello / AR 3000 (s/n PR19S001396)
 Heat Input Rating: 3.0 MMBtu/hr
 Emissions: 30 ppmv NO_x / 50 ppmv CO (corrected to 3% O₂)
 Fuel: Natural gas
 Year of Manufacture: 2023
 Exhaust Stack: 10" diameter vertical at ~19' above grade.
 Location: 45°36'58.25"N 122°26'49.44"W

- 5.c. Boiler #2 (new). One natural gas fired hot water boiler operated in support of a hydronic heating system. The boiler is described as follows:

Boiler Make / Model: Riello / AR 3000 (s/n PR12S001265)
 Heat Input Rating: 3.0 MMBtu/hr
 Emissions: 30 ppmv NO_x / 50 ppmv CO (corrected to 3% O₂)
 Fuel: Natural gas
 Year of Manufacture: 2023
 Exhaust Stack: 10" diameter vertical at ~19' above grade.
 Location: 45°36'58.25"N 122°26'49.44"W

- 5.d. Boiler #1 (removed). One natural gas fired hot water boiler operated in support of a hydronic heating system. The boiler is described as follows:

Boiler Make / Model: Bryan / RV500-W-FDG (s/n 78530)
 Burner Make/Model: Gordon-Piatt R10.2-GO-50
 Heat Input Rating: 5.0 MMBtu/hr
 Fuel: Natural gas
 Year of Manufacture: 1996
 Exhaust Stack: 16" diameter vertical at 20' above grade.

- 5.e. Boiler #2 (removed). One natural gas fired hot water boiler operated in support of a hydronic heating system. The boiler is described as follows:

Boiler Make / Model: Bryan / RV500-W-FDG (s/n 78362)
 Burner Make/Model: Gordon-Piatt R10.2-GO-50
 Heat Input Rating: 5.0 MMBtu/hr
 Fuel: Natural gas
 Year of Manufacture: 1996
 Exhaust Stack: 16" diameter vertical at 20' above grade.

- 5.f. Equipment/Activity Summary.

ID No.	Equipment/Activity	Control Equipment/Measure
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)

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

6. EMISSIONS DETERMINATION

Emissions to the ambient atmosphere from the equipment proposed in ADP Application CL-3260 consist of nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), particulate matter (PM), sulfur dioxide (SO₂), toxic air pollutants (TAPs), and hazardous air pollutants (HAPs).

Unless otherwise specified by SWCAA, actual emissions must be determined using the specified input parameter listed for each emission unit and the following hierarchy of methodologies:

- (a) Continuous emissions monitoring system (CEMS) data;
 - (b) Source emissions test data (EPA reference method). When source emissions test data conflicts with CEMS data for the time period of a source test, source test data must be used;
 - (c) Source emissions test data (other test method); and
 - (d) Emission factors or methodology provided in this TSD.
- 6.a. Water Heaters (existing). Emissions from water heater operation are calculated from a combined rated heat input of 0.57 MMBtu/hr, 8,760 hr/yr of operation, and applicable emission factors. The emission factor for NO_x corresponds to the category emission limit established in SWCAA 400-070(13). All other emission factors are taken from EPA AP-42 §1.4 "Natural Gas Combustion" (3/98). All PM is assumed to be PM_{2.5}. Annual emissions will be calculated based on actual fuel consumption using the same methodology.

Heat Input Rating =	0.570	MMBtu/hr		
Gas Heat Content =	1,020	Btu/scf		
Fuel Consumption =	4,993	MMBtu/yr		
	Emission Factor		Emissions	
Pollutant	(lb/MMBtu)	(lb/hr)	(lb/yr)	(tpy)
NO _x	0.0240	0.014	120	0.06
CO	0.0824	0.047	411	0.21
VOC	0.0054	0.003	27	0.013
SO _x as SO ₂	5.88E-04	3.4E-04	3	0.0015
PM (total)	0.0075	0.004	37	0.019
PM ₁₀	0.0075	0.004	37	0.019
PM _{2.5}	0.0075	0.004	37	0.019
Benzene	2.06E-06	1.2E-06	1.0E-02	5.1E-06
Formaldehyde	7.35E-05	4.2E-05	3.7E-01	1.8E-04
CO ₂ e	117	66.7	584,204	292

- 6.b. Boiler #1 (new). Emissions from boiler operation are calculated from a rated heat input of 3.0 MMBtu/hr, 8,760 hr/yr of operation, and applicable emission factors. Emission factors for NO_x and CO correspond to 30 ppmv and 50 ppmv at 3% O₂, respectively. All other emission factors are taken from EPA AP-42 §1.4 "Natural Gas Combustion" (3/98). All PM is assumed to be PM_{2.5}. Annual emissions will be calculated based on actual fuel consumption using the same methodology.

Heat Input Rating =	3.000	MMBtu/hr		
Gas Heat Content =	1,020	Btu/scf		
Fuel Consumption =	26,280	MMBtu/yr		
	Emission Factor		Emissions	
Pollutant	(lb/MMBtu)	(lb/hr)	(lb/yr)	(tpy)
NO _x	0.0360	0.11	946	0.47
CO	0.0369	0.11	970	0.48
VOC	0.0054	0.02	142	0.071
SO _x as SO ₂	5.88E-04	1.8E-03	15	0.0077
PM (total)	0.0075	0.02	196	0.10
PM ₁₀	0.0075	0.02	196	0.10
PM _{2.5}	0.0075	0.02	196	0.10
Benzene	2.06E-06	6.2E-06	5.4E-02	2.7E-05
Formaldehyde	7.35E-05	2.2E-04	1.9E+00	9.7E-04
CO ₂ e	117	351.0	3,074,760	1537

- 6.c. Boiler #2 (new). Emissions from boiler operation are calculated from a rated heat input of 3.0 MMBtu/hr, 8,760 hr/yr of operation, and applicable emission factors. Emission factors for NO_x and CO correspond to 30 ppmv and 50 ppmv at 3% O₂, respectively. All other emission factors are taken from EPA AP-42 §1.4 "Natural Gas Combustion" (3/98). All PM is assumed to be PM_{2.5}. Annual emissions will be calculated based on actual fuel consumption using the same methodology.

Heat Input Rating =	3.000	MMBtu/hr		
Gas Heat Content =	1,020	Btu/scf		
Fuel Consumption =	26,280	MMBtu/yr		
	Emission Factor		Emissions	
Pollutant	(lb/MMBtu)	(lb/hr)	(lb/yr)	(tpy)
NO _x	0.0360	0.11	946	0.47
CO	0.0369	0.11	970	0.48
VOC	0.0054	0.02	142	0.071
SO _x as SO ₂	5.88E-04	1.8E-03	15	0.0077
PM (total)	0.0075	0.02	196	0.10
PM ₁₀	0.0075	0.02	196	0.10
PM _{2.5}	0.0075	0.02	196	0.10
Benzene	2.06E-06	6.2E-06	5.4E-02	2.7E-05
Formaldehyde	7.35E-05	2.2E-04	1.9E+00	9.7E-04
CO ₂ e	117	351.0	3,074,760	1537

- 6.d. Emissions Summary/Facility-wide Potential to Emit. Facility-wide potential to emit as calculated in the sections above is summarized below.

<u>Pollutant</u>	<u>Potential Emissions (tpy)</u>
NO _x	1.01
CO	1.18
VOC	0.16
SO ₂	0.017
Lead	0.00
PM	0.21
PM ₁₀	0.21
PM _{2.5}	0.21
TAP	0.0022
HAP	0.0022
CO _{2e}	3,367

<u>Pollutant</u>	<u>CAS Number</u>	<u>Category</u>	<u>Facility-wide Emissions</u>	<u>Project Increase</u>	<u>WAC 173-460 SQER</u>
			<u>lb/yr</u>	<u>lb/yr</u>	<u>lb/yr</u>
Benzene	71-43-2	HAP/TAP	0.12	0.0	20
Formaldehyde	50-00-0	HAP/TAP	4.2	0.0	20

7. REGULATIONS AND EMISSION STANDARDS

Regulations that have been used to evaluate the acceptability of the proposed facility and establish emission limits and control requirements include, but are not limited to, the regulations, codes, or requirements listed below.

- 7.a. Chapter 40 Code of Federal Regulations (40 CFR) 63 Subpart JJJJJ "National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources" establishes performance standards and requirements for industrial, commercial and institutional boilers operating at an area source of hazardous air pollutants. The units at this facility are "gas-fired boilers" and not subject to Subpart JJJJJ.
- 7.b. Revised Code of Washington (RCW) 70A.15.2040 empowers any activated air pollution control authority to prepare and develop a comprehensive plan or plans for the prevention, abatement and control of air pollution within its jurisdiction. An air pollution control authority may issue such orders as may be necessary to effectuate the purposes of the Washington Clean Air Act and enforce the same by all appropriate administrative and judicial proceedings subject to the rights of appeal as provided in Chapter 62, Laws of 1970 ex. sess.
- 7.c. RCW 70A.15.2210 provides for the inclusion of conditions of operation as are reasonably necessary to assure the maintenance of compliance with the applicable ordinances, resolutions, rules and regulations when issuing an Air Discharge Permit for installation and establishment of an air contaminant source.
- 7.d. WAC 173-460 "Controls for New Sources of Toxic Air Pollutants" requires Best Available Control Technology for toxic air pollutants (T-BACT), identification and quantification of emissions of toxic air pollutants and demonstration of protection of human health and safety.
- 7.e. WAC 173-476 "Ambient Air Quality Standards" establishes ambient air quality standards for PM₁₀, PM_{2.5}, lead, sulfur dioxide, nitrogen dioxide, ozone, and carbon monoxide in the ambient air, which shall not be exceeded.

- 7.f. SWCAA 400-040 "General Standards for Maximum Emissions" requires all new and existing sources and emission units to meet certain performance standards with respect to Reasonably Available Control Technology (RACT), visible emissions, fallout, fugitive emissions, odors, emissions detrimental to persons or property, sulfur dioxide, concealment and masking, and fugitive dust.
- 7.g. SWCAA 400-050 "Emission Standards for Combustion and Incineration Units" requires that all provisions of SWCAA 400-040 be met and that no person shall cause or permit the emission of particulate matter from any combustion or incineration unit in excess of 0.23 grams per dry cubic meter (0.1 grains per dry standard cubic foot) of exhaust gas at standard conditions.
- 7.h. SWCAA 400-060 "Emission Standards for General Process Units" prohibits particulate matter emissions from all new and existing process units in excess of 0.1 grains per dry standard cubic foot of exhaust gas.
- 7.i. SWCAA 400-070(13) "General Requirements for Certain Source Categories: Natural Gas-Fired Water Heaters."
- (a) Applicability. The requirements of this section apply to all natural gas-fired water heaters with a rated heat input less than 400,000 Btu/hr. For the purposes of this subsection, the term "water heater" means a closed vessel in which water is heated by combustion of gaseous fuel and is withdrawn for use external to the vessel at pressures not exceeding 160 psig, including the apparatus by which heat is generated and all controls and devices necessary to prevent water temperatures from exceeding 210°F.
 - (b) Requirements.
 - (i) On or after January 1, 2010, no person shall offer for sale, or install, a water heater that emits NO_x at levels in excess of 55 ppmv at 3% O₂, dry (0.067 lb per million Btu of heat input).
 - (ii) On or after January 1, 2013, no person shall offer for sale, or install, a water heater that emits NO_x at levels in excess of 20 ppmv at 3% O₂, dry (0.024 lb per million Btu of heat input).
- 7.j. SWCAA 400-109 "Air Discharge Permit Applications" requires that an Air Discharge Permit application be submitted for all new installations, modifications, changes, or alterations to process and emission control equipment consistent with the definition of "new source". Sources wishing to modify existing permit terms may submit an Air Discharge Permit application to request such changes. An Air Discharge Permit must be issued, or written confirmation of exempt status must be received, before beginning any actual construction, or implementing any other modification, change, or alteration of existing equipment, processes, or permits.
- 7.k. SWCAA 400-110 "New Source Review" requires that SWCAA issue an Air Discharge Permit in response to an Air Discharge Permit application prior to establishment of the new source, emission unit, or modification.
- 7.l. SWCAA 400-111 "Requirements for Sources in a Maintenance Plan Area" requires that no approval to construct or alter an air contaminant source shall be granted unless it is evidenced that:
- (1) The equipment or technology is designed and will be installed to operate without causing a violation of the applicable emission standards;
 - (2) Emissions will be minimized to the extent that the new source will not exceed emission levels or other requirements provided in the maintenance plan;
 - (3) Best Available Control Technology will be employed for all air contaminants to be emitted by the proposed equipment;
 - (4) The proposed equipment will not cause any ambient air quality standard to be exceeded; and
 - (5) If the proposed equipment or facility will emit any toxic air pollutant regulated under WAC 173-460, the proposed equipment and control measures will meet all the requirements of that Chapter.

8. RACT/BACT/BART/LAER/PSD/CAM DETERMINATIONS

The proposed equipment and control systems incorporate Best Available Control Technology (BACT) for the types and amounts of air contaminants emitted by the processes as described below:

New BACT Determinations

- 8.a. BACT Determination – Hot Water Boilers. The proposed use of low sulfur fuel (natural gas), annual emission monitoring, and low emission burner technology (≤ 30 ppmv – NO_x, ≤ 50 ppmv CO) has been determined to meet the requirements of BACT for new hot water boilers at this facility.

Other Determinations

- 8.b. Prevention of Significant Deterioration (PSD) Applicability Determination. The potential to emit of this facility is less than applicable PSD applicability thresholds. Likewise, this permitting action will not result in a potential increase in emissions equal to or greater than the PSD thresholds. Therefore, PSD review is not applicable to this action.
- 8.c. Compliance Assurance Monitoring (CAM) Applicability Determination. CAM is not applicable to any emission unit at this facility because it is not a major source and is not required to obtain a Part 70 permit.

9. AMBIENT IMPACT ANALYSIS

- 9.a. TAP Small Quantity Review. The new equipment and modifications proposed in ADP Application CL-3260 will not change the type or increase the quantity of TAP emissions from this facility.

Conclusions

- 9.b. Installation of replacement hot water boilers, as proposed in ADP Application CL-3260, will not cause the ambient air quality requirements of Title 40 Code of Federal Regulations (CFR) Part 50 "National Primary and Secondary Ambient Air Quality Standards" to be violated.
- 9.c. Installation of replacement hot water boilers, as proposed in ADP Application CL-3260, will not cause the requirements of WAC 173-460 "Controls for New Sources of Toxic Air Pollutants" or WAC 173-476 "Ambient Air Quality Standards" to be violated.
- 9.d. Installation of replacement hot water boilers, as proposed in ADP Application CL-3260, will not cause a violation of emission standards for sources as established under SWCAA General Regulations Sections 400-040 "General Standards for Maximum Emissions," 400-050 "Emission Standards for Combustion and Incineration Units," and 400-060 "Emission Standards for General Process Units."

10. DISCUSSION OF APPROVAL CONDITIONS

SWCAA has made a determination to issue ADP 24-3637 in response to ADP Application CL-3260. ADP 24-3637 contains approval requirements deemed necessary to assure compliance with applicable regulations and emission standards as discussed below.

- 10.a. General Basis. Permit requirements for equipment affected by this permitting action incorporate the operating schemes proposed by the applicant in ADP Application CL-3260. Permit requirements established by this action are intended to implement BACT, minimize emissions, and assure compliance with applicable requirements on a continuous basis. Emission limits for approved equipment are based on the maximum potential emissions calculated in Section 6 of this Technical Support Document.

- 10.b. Monitoring and Recordkeeping Requirements. ADP 24-3637 establishes monitoring and recordkeeping requirements sufficient to document compliance with applicable emission limits, ensure proper operation of approved equipment and provide for compliance with generally applicable requirements. Specific monitoring requirements are established for fuel consumption.
- 10.c. Reporting Requirements. ADP 24-3637 establishes general reporting requirements for annual air emissions, upset conditions and excess emissions. Specific reporting requirements are established for fuel consumption. Reports are to be submitted on an annual basis.
- 10.d. Space Heating Boilers - Riello. Permit requirements for the Riello space heating boilers listed in this application incorporate expected operational performance and the operating schemes proposed by the permit applicant at the time of installation. The boilers are low emission models. Emission concentrations of NO_x and CO have been limited to levels that reflect proper maintenance and operation. Visible emissions from the boilers are limited to 0% opacity. Annual emission monitoring requirements have been established to assure proper operation on an ongoing basis. Although the space heating boilers will only operate in specific heating load conditions, annual hours of operation have not been restricted.

11. START-UP AND SHUTDOWN/ALTERNATIVE OPERATING SCENARIOS/POLLUTION PREVENTION

- 11.a. Start-up and Shutdown Provisions. Pursuant to SWCAA 400-081 "Start-up and Shutdown", technology based emission standards and control technology determinations shall take into consideration the physical and operational ability of a source to comply with the applicable standards during start-up or shutdown. Where it is determined that a source is not capable of achieving continuous compliance with an emission standard during start-up or shutdown, SWCAA shall include appropriate emission limitations, operating parameters, or other criteria to regulate performance of the source during start-up or shutdown.

The applicant did not identify any start-up and shutdown periods during which affected equipment is not capable of achieving continuous compliance with applicable technology determinations or approval conditions. To SWCAA's knowledge, this facility can comply with all applicable standards during startup and shutdown.

- 11.b. Alternate Operating Scenarios. SWCAA conducted a review of alternate operating scenarios applicable to equipment affected by this permitting action. The permittee did not propose or identify any applicable alternate operating scenarios. Therefore, none were included in the permit requirements.
- 11.c. Pollution Prevention Measures. SWCAA conducted a review of possible pollution prevention measures for the facility. No pollution prevention measures were identified by either the permittee or SWCAA separate or in addition to those measures required under BACT considerations. Therefore, none were included in the permit requirements.

12. EMISSION MONITORING AND TESTING

- 12.a. Emission Monitoring – Space Heating Boilers. Emission monitoring of each space heating boiler is required on a continuing 12-month cycle. All emission monitoring shall be conducted in accordance with ADP 24-3637, Appendix A.

13. FACILITY HISTORY

- 13.a. Previous Permitting Actions. SWCAA has not previously issued any Permits for this facility.

- 13.b. Compliance History. A search of source records on file at SWCAA did not identify any outstanding compliance issues at this facility.

14. PUBLIC INVOLVEMENT OPPORTUNITY

- 14.a. Public Notice for ADP Application CL-3260. Public notice for ADP Application CL-3260 was published on the SWCAA internet website for a minimum of (15) days beginning on February 14, 2024.
- 14.b. Public/Applicant Comment for ADP Application CL-3260. SWCAA did not receive specific comments, a comment period request or any other inquiry from the public regarding this ADP application. Therefore no public comment period was provided for this permitting action.
- 14.c. State Environmental Policy Act. This project is exempt from SEPA requirements pursuant to WAC 197-11-800(3) since it only involves replacement of existing equipment with no material expansions or changes in use. SWCAA issued a Determination of SEPA Exempt (SWCAA 24-014) concurrent with issuance of ADP 24-3637.