



June 5, 2024

Ms. Karen Deal, Sustainability Officer  
Lakeside Industries, Inc.  
500 Tennant Way  
Longview, WA 98623

Subject: Final Air Discharge Permit for Asphalt Cement Pellet Manufacturing Plant

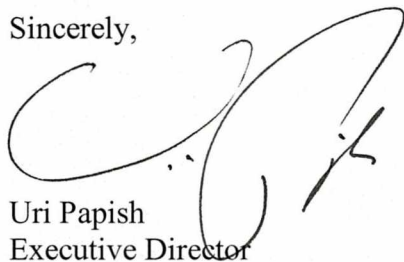
Dear Ms. Deal:

A final determination to issue Air Discharge Permit 24-3647 (ADP 24-3647) has been completed for Air Discharge Permit (ADP) Application CO-1096 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 CO-1096 was published in the permit section of SWCAA's internet website on May 3, 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 24-3647 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 24-3647 and Technical Support Document





**AIR DISCHARGE PERMIT  
24-3647**

**Issued: June 5, 2024**

Lakeside Industries – Pelletizing Plant  
500 Tennant Way, Longview, WA 98623

SWCAA ID - 2803



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      | Dry Additive Storage Silo                   | Process Enclosure, High Efficiency Filtration                      |
| 2      | Asphalt Cement Pelletizers and Coating Drum | Process Enclosure, Liquid Binding Agent High Efficiency Filtration |
| 3      | Material Handling and Storage               | Process Enclosure, Wet Suppression                                 |

## 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>Emissions from the Dry Additive Storage Silo must not exceed the following:</p> <table> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>PM<sub>10</sub></td> <td>0.23 tpy, 0.005 gr/dscf (1-hour average)</td> </tr> <tr> <td>Calcium Hydroxide</td> <td>405.5 lb/yr</td> </tr> </tbody> </table> <p>Annual emissions must be calculated based on actual hours of operation consistent with the methodology in Section 6 of the Technical Support Document for this Permit.</p> | <u>Pollutant</u>          | <u>Emission Limit</u> | PM <sub>10</sub>                     | 0.23 tpy, 0.005 gr/dscf (1-hour average) | Calcium Hydroxide            | 405.5 lb/yr | 1   |
| <u>Pollutant</u>                     | <u>Emission Limit</u>  |                           |                       |                                      |  |                              |             |     |
| PM <sub>10</sub>                     | 0.23 tpy, 0.005 gr/dscf (1-hour average)   |                           |                       |                                      |  |                              |             |     |
| Calcium Hydroxide                    | 405.5 lb/yr  |                           |                       |                                      |  |                              |             |     |
| 2.                                   | <p>Emissions from the Central Dust Collector must not exceed the following:</p> <table> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>PM<sub>10</sub></td> <td>2.25 tpy, 0.005 gr/dscf (1-hour average)</td> </tr> <tr> <td>Calcium Hydroxide</td> <td>689.3 lb/yr</td> </tr> </tbody> </table> <p>Annual emissions must be calculated based on actual hours of operation consistent with the methodology in Section 6 of the Technical Support Document for this Permit.</p>    | <u>Pollutant</u>          | <u>Emission Limit</u> | PM <sub>10</sub>                     | 2.25 tpy, 0.005 gr/dscf (1-hour average) | Calcium Hydroxide            | 689.3 lb/yr | 2   |
| <u>Pollutant</u>                     | <u>Emission Limit</u>  |                           |                       |                                      |  |                              |             |     |
| PM <sub>10</sub>                     | 2.25 tpy, 0.005 gr/dscf (1-hour average)   |                           |                       |                                      |  |                              |             |     |
| Calcium Hydroxide                    | 689.3 lb/yr  |                           |                       |                                      |  |                              |             |     |
| 3.                                   | <p>Visible emissions from approved equipment must not exceed the following 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).</p> <table> <thead> <tr> <th><u>Equipment</u></th> <th><u>Opacity Limit</u></th> </tr> </thead> <tbody> <tr> <td>Dust Collector / Vent Filter Exhaust</td> <td>0%</td> </tr> <tr> <td>Material Handling Operations</td> <td>5%</td> </tr> </tbody> </table>                                   | <u>Equipment</u>          | <u>Opacity Limit</u>  | Dust Collector / Vent Filter Exhaust | 0%                                       | Material Handling Operations | 5%          | 1-3 |
| <u>Equipment</u>                     | <u>Opacity Limit</u>   |                           |                       |                                      |  |                              |             |     |
| Dust Collector / Vent Filter Exhaust | 0%   |                           |                       |                                      |  |                              |             |     |
| Material Handling Operations         | 5%   |                           |                       |                                      |  |                              |             |     |

**Operating Limits and Requirements**

| <b>Req. No.</b> | <b>Operating Limits and Requirements</b>   | <b>Equipment/ Activity ID No.</b> |
|-----------------|--|-----------------------------------|
| 4.              | Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.  | Facility-wide                     |
| 5.              | The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.  | Facility-wide                     |
| 6.              | Wet suppression must be provided as necessary to control fugitive dust from haul roads and material storage piles.   | Facility-wide                     |
| 7.              | Each pollution control device/measure must be in use whenever the associated production equipment is in operation. Control devices must be operated and maintained in accordance with the manufacturer's specifications and operated in a manner that minimizes emissions.   | 1-3                               |
| 8.              | Emission units identified in this Permit must 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. | 1-3                               |
| 9.              | All deliveries of dry additive must be made via enclosed pneumatic transfer.   | 1                                 |
| 10.             | The Dry Additive Storage Silo must be completely closed and vented to the associated vent filter at all times during active material transfer.   | 1                                 |
| 11.             | Asphalt cement pellet production must not exceed 30 tons per hour.   | 2                                 |
| 12.             | The pelletizers and coating drum must be vented to the central dust control system at all times during active operation.   | 2                                 |
| 13.             | Shingle grindings used in the pelletizing process must be asbestos free.   | 2-3                               |

**Monitoring and Recordkeeping Requirements**

| <b>Req. No.</b> | <b>Monitoring and Recordkeeping Requirements</b>  | <b>Equipment/ Activity ID No.</b> |
|-----------------|---|-----------------------------------|
| 14.             | All air quality related complaints, including odor complaints, received by the permittee and the results of any subsequent investigation or corrective action must be recorded for each occurrence.   | Facility-wide                     |
| 15.             | For each product used or produced at the facility that contains VOC, HAP, or TAP, the Permittee must maintain purchase receipts for quantities, Safety Data Sheet information, and Technical Data Sheets in a readily accessible form.  | Facility-wide                     |
| 16.             | With the exception of data logged by a computerized data acquisition system, each record required by this Permit must include the date and the name of the person making the record entry. If a control device or process is not operating during a specific time period, a record must be made to that effect. | 1-3                               |
| 17.             | All records required by this Permit must be kept for a minimum period of no less than three years and must be maintained in a form readily available for inspection by SWCAA representatives.   | 1-3                               |

| <b>Req. No.</b> | <b>Monitoring and Recordkeeping Requirements</b>   | <b>Equipment/ Activity ID No.</b> |
|-----------------|--|-----------------------------------|
| 18.             | Excess emissions and upset conditions must be recorded for each occurrence.  | 1-3                               |
| 19.             | The following information must be collected, recorded at the intervals specified below, and maintained readily available on-site for inspection:<br>(a) Dry additive throughput and type (tons) Recorded monthly<br>(b) Asphalt cement pellet production (tons) Recorded monthly<br>(c) Dust collector / vent filter operation (hrs) Recorded monthly<br>(d) Dust collector / vent filter survey results Recorded for each survey<br>(e) Replacement of filter media Recorded for each occurrence<br>(f) Maintenance activities that may affect emissions from approved equipment Recorded for each occurrence<br>(g) Calculated air emissions Recorded annually | 1-3                               |

### Emission Monitoring and Testing Requirements

| <b>Req. No.</b> | <b>Emission Monitoring and Testing Requirements</b>   | <b>Equipment/ Activity ID No.</b> |
|-----------------|---|-----------------------------------|
| 20.             | The permittee must conduct a monthly visual survey of the Dry Additive Storage Silo vent filter and the Central Dust Collector while in use to confirm proper operation.  | 1-2                               |
| 21.             | The permittee must conduct initial and periodic emission testing of the Central Dust Collector as described in Appendix A of this Permit. The permittee must provide adequate and safe access to sampling ports meeting the criteria of EPA Method 1 (40 CFR 60, Appendix A). | 2                                 |

### Reporting Requirements

| <b>Req. No.</b> | <b>Reporting Requirements</b>  | <b>Equipment/ Activity ID No.</b> |
|-----------------|--|-----------------------------------|
| 22.             | 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:<br>(a) Date and time of the complaint;<br>(b) Name of the complainant;<br>(c) Nature of the complaint; and<br>(d) Description of corrective action taken in response to complaint (if any). | Facility-wide                     |

| Req. No. | Reporting Requirements  | Equipment/ Activity ID No. |
|----------|---|----------------------------|
| 23.      | <p>A written report must be submitted to SWCAA at least 7 calendar days prior to the use of any new product that contains VOCs, TAPs, or HAPs. The report must contain the following:</p> <ul style="list-style-type: none"> <li>(a) A description of the product, Safety Data Sheet information, and the location where the product will be used;</li> <li>(b) The date by which the Permittee intends to begin use of the product;</li> <li>(c) The amount of product expected to be used;</li> <li>(d) A quantification of the change in VOC, HAP and TAP emissions from use of the product; and</li> <li>(e) A summary of any applicable requirement that would apply as a result of using the product.</li> </ul> <p>If use of the new product would cause any emission limit or SQER to be exceeded, the Permittee must submit an ADP application to SWCAA to request a revision to this ADP. The Permittee must not begin using the new product until a revised ADP is issued.</p> | Facility-wide              |
| 24.      | <p>Excess emissions must be reported to SWCAA as follows:</p> <ul style="list-style-type: none"> <li>(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;</li> <li>(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</li> <li>(c) No later than 30 days after the end of the month of discovery for all other excess emissions.</li> </ul>  | 1-3                        |
| 25.      | <p>The following emission-related information must be reported to SWCAA by March 15<sup>th</sup> for the previous calendar year:</p> <ul style="list-style-type: none"> <li>(a) Dry additive throughput and type;</li> <li>(b) Asphalt cement pellet production;</li> <li>(c) Dust collector / vent filter operation; and</li> <li>(d) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs).</li> </ul>   | 1-3                        |
| 26.      | Emission test results must be reported to SWCAA in writing within 45 days of test completion.   | 2                          |
| 27.      | Initial start-up of SWCAA approved emission units must be reported to SWCAA in writing within 10 days of commencing regular operation.  | 1-3                        |

### 3. General Provisions

| Req. No. | General Provisions   |
|----------|--|
| A.       | <p>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.</p> |

| <b>Req. No.</b> | <b>General Provisions</b>   |
|-----------------|---|
| 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.  |
| K.              | For the purposes of establishing if a condition of this ADP has been violated or is being violated, nothing in this ADP precludes the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test procedures or methods had been performed. |



## Appendix A

### Emission Testing Requirements Central Dust Collector

#### 1. Introduction:

The purpose of this testing is to quantify emissions from the Central Dust Collector, and demonstrate compliance with the requirements of this Permit and applicable air quality regulations.

#### 2. Testing Requirements:

- a. **Testing Schedule.** Initial emission testing of the Central Dust Collector must be conducted no later than 90 days after commencing regular operation. Subsequent emission testing must be conducted on a continuing 7 year cycle, no later than the end of the calendar month in which the initial emission test was performed. Emission testing may be conducted up to three calendar months prior to the month in which testing is due. Emission testing conducted earlier requires prior approval by SWCAA. Testing before or after the scheduled due date does not modify or reset the test schedule.
- b. **Test Plan.** A comprehensive test plan must be submitted to SWCAA for review and approval at least 10 business days prior to the proposed test date. SWCAA personnel must be informed at least 5 business days prior to testing so that a representative may be present during testing.
- c. **Test Location.** Sampling must be conducted at the dust collector exhaust stack.
- d. **Test Runs/Reference Test Methods.** A minimum of 3 test runs must be performed for each constituent listed below to ensure the data are representative. Compliance must be demonstrated by averaging the results of the individual sampling runs.

| <u>Constituent</u>     | <u>Reference Test Method</u> | <u>Minimum Test Run Duration</u> |
|------------------------|------------------------------|----------------------------------|
| Flow rate, temperature | EPA Methods 1 and 2          | N/A                              |
| Moisture content       | EPA Method 4                 | 60 minutes                       |
| PM                     | EPA Method 5, 17, or ODEQ 17 | 60 minutes                       |
| Opacity                | SWCAA Method 9               | 6 minutes**                      |

\* Ambient concentrations of O<sub>2</sub> and CO<sub>2</sub> can be assumed instead of using Method 3.

\*\* If visible emissions are observed during any 6 minute test run, the affected test run must be extended to a length of 60 minutes.

#### 3. Source Operation:

- a. **Source Operations.** Source operations during the emissions test must be representative of maximum intended operating conditions.
- b. **Record of Production Parameters.** Production related parameters and equipment operating conditions must be recorded during emissions testing to correlate operating conditions with emissions. All recorded production parameters must be documented in the test results report. At a minimum, the following parameters must be recorded:
  - (1) Startup and shutdown of process and control equipment;
  - (2) Process adjustments made during testing;
  - (3) Pellet production rate during testing; and
  - (4) Dry additive feed rate during testing.

**4. Reporting Requirements:**

- a. **Test Report.** Unless otherwise directed by SWCAA, a final test report must be prepared and submitted to SWCAA in an approved form within 45 calendar days of test completion and, at a minimum, must contain the following information:
- (1) 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) A brief description of the purpose of the test, for example, an initial test, a periodic test required by an ADP, a test required by a federal, state, or local rule or regulation, or a test required to determine compliance with a Notice to Correct;
  - (3) Time and date of the test and identification and qualifications of the personnel involved, including SWCAA personnel who observed the testing;
  - (4) The location and description of the discharge point (stack, port, etc.), including the dimensions (diameter, length and width, or other) and height above ground level. A photo of the discharge point is highly recommended;
  - (5) The location of the sample ports or test location and a description of how the sampling location relates to the discharge point. For example, the sampling location may be in a square duct some distance away from the discharge point, which is a round stack. A photo of the sample ports or test location is highly recommended;
  - (6) Summary of results, reported in units and averaging periods consistent with the applicable emissions standard or unit;
  - (7) Summary of control system or equipment operating conditions;
  - (8) Summary of production related parameters, including those cited in Section 3;
  - (9) A description of the test methods or procedures used, including all field data, quality assurance/quality control procedures and documentation;
  - (10) A description of the analytical procedures used, including all laboratory data, quality assurance/quality control procedures and documentation;
  - (11) Copies of field data and example calculations;
  - (12) Chain of custody information;
  - (13) Calibration documentation;
  - (14) Discussion of any abnormalities associated with the results; and
  - (15) A statement signed by the senior management official of the testing firm certifying the validity of the source test report. Test reports with material mistakes or misinformation may be rejected by SWCAA.
- b. **Test Results.** Test results must be reported in units of gr/dscf and lb/hr.

**5. Changes to Testing Requirements:**

Emission testing 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 testing schedule. Upon review of the request and in accordance with EPA delegation, SWCAA will inform the Permittee in writing of any approved modifications.