



January 22, 2025

Dan McFarlane
8606 NE 117th Ave.
Vancouver, WA 98662

Subject: Final Approval for Green and Woody Waste Handling and Grinding Activities

Dear Dan McFarlane:

A final determination to issue Air Discharge Permit (ADP) / Nonroad Engine Permit (NEP) 25-3683 has been completed for ADP/NEP application CL-3284 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/NEP application CL-3284 was published in the permit section of SWCAA's website on December 27, 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/NEP 25-3683 and the associated Technical Support Document are available for public review in the "Recent Air Discharge Permits" section under the "Air Permits" link on SWCAA's website (<http://www.swcleanair.gov>). Original copies are enclosed for your files.

ADP/NEP 25-3683 may be appealed directly to the Pollution Control Hearings Board (PCHB) within thirty (30) days of receipt as provided in Revised Code of Washington (RCW) 43.21B.

If you have any questions or comments, or desire additional information, please contact me or Clint Lamoreaux at (360) 574-3058, extension 131.

Sincerely,

Uri Papish
Executive Director

UP:cl

Enclosure: Technical Support Document and ADP/NEP 25-3683





**AIR DISCHARGE PERMIT / NONROAD ENGINE PERMIT
25-3683**

Issued: January 22, 2025

McFARLANE'S BARK, INC.
8806 NE 117th Avenue, Vancouver, WA

SWCAA ID – 2532



REVIEWED BY:

Clinton Lamoreaux
Clinton Lamoreaux, Chief Engineer

APPROVED BY:

Uri Papish
Uri Papish, Executive Director

TABLE OF CONTENTS

1. Equipment/Activity Identification 1

2. Permit Requirements..... 1

 Emission Limits 1

 Operating Limits and Requirements 2

 Monitoring and Recordkeeping Requirements 4

 Emission Monitoring and Testing Requirements 4

 Reporting Requirements 4

3. General Provisions 5

Appendix A Progressive Odor Management Plan

1. Equipment/Activity Identification

ID No.	Equipment/Activity	Control Equipment/Measure
1	Green and Woody Waste Handling	Wet suppression, stockpiling limitations
2	Horizontal Grinder – Plant 1 (Morbark 6600)	Wet suppression as necessary
3	Horizontal Grinder – Plant 2 (Morbark 6600)	Wet suppression as necessary
4	Nonroad Diesel Engine – Plant 1 (Caterpillar – 1,000 hp)	Ultra-low sulfur diesel, EPA Tier 1 certification
5	Nonroad Diesel Engine – Plant 2 (Caterpillar – 1,000 hp)	Ultra-low sulfur diesel, EPA Tier 1 certification

2. Permit Requirements

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

Air Discharge Permits 19-3362 and 19-3376 are superseded in their entirety by this Air Discharge Permit.

Emission Limits

Req. No.	Emission Limits	Equipment/Activity ID No.
1.	Visible emissions from fugitive dust sources and the horizontal grinders must not exceed zero percent 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 - 3
2.	Visible emissions from the nonroad diesel engines must not exceed five percent 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) except during startup. For the purposes of this requirement, the startup period ends when the earlier of the following operating events occurs: (a) The engine has reached normal operating temperature; or (b) The engine has been operating for 15 minutes.	4 - 5

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.	Wet suppression must be provided as necessary to control fugitive dust from material handling equipment, wood grinding, wood chipping, storage piles, and processing areas in the event that process changes, dry weather, or other conditions result in insufficient water application to control fugitive dust. Wet suppression may include wetting materials prior to handling, grinding, chipping, and screening activities to prevent dust generation, or the use of high-pressure (i.e. ≥ 80 psig) or sonic fogging nozzles at the point of dust generation.	Facility-wide
5.	Reasonable precautions must be used to prevent fugitive dust from becoming airborne. Reasonable precautions include the use of adequate wet suppression or enclosure of the operations responsible for creating fugitive dust.	Facility-wide
6.	Use of emission units not identified in this Permit (e.g., engine powered grinder and conveyor) is not allowed without prior written approval from SWCAA.	Facility-wide
7.	The Permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facility-wide
8.	If nuisance odors are identified from the Permittee's facility, the Permittee must implement a Progressive Odor Management Plan in accordance with Appendix A of this Permit. SWCAA may require additional measures consistent with SWCAA 400-040(4) in the event that the Progressive Odor Management Plan fails to adequately address odor impacts. Implementation of the corrective actions identified in the Progressive Odor Management Plan does not shield the Permittee from enforcement actions by SWCAA.	Facility-wide
9.	A nonresettable time totalizer must be maintained on each nonroad engine and used to measure the number of hours each unit operates.	4 - 5
10.	The nonroad diesel engines must only be fired on #2 diesel or better. The sulfur content of the fuel fired in the engines must not exceed 0.0015% by weight (15 ppm). A fuel certification from the fuel supplier, a purchase receipt indicating the fuel sulfur content, or test results using an appropriate method listed in 40 CFR 60.17 may be used to demonstrate compliance with this requirement.	4 - 5
11.	The Permittee must not conduct composting activities on-site. Compost brought to the site for sale must be beyond the active composting phase. For the purposes of this requirement, the active composting phase ends when the carbon dioxide evolution rate is: <ul style="list-style-type: none"> (a) No more than 7 mg CO₂-C / g organic matter / day; (b) No more than 8 mg CO₂-C / g organic carbon / day; or (c) A minimum Solvita maturity index of 5. 	Facility-wide

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
12.	<p>Putrescible materials must not be stored or stockpiled on site. For the purposes of this requirement, composted materials and wood waste (including tree stumps) are not putrescible materials. Green waste other than wood waste, and uncomposted manure are examples of feedstocks that may not be stored or stockpiled on site.</p> <p>With the exception of wood waste, (e.g., bare tree limbs and stumps) or fallen leaves, green waste must be removed from the site on the following schedule:</p> <ul style="list-style-type: none"> (a) Sunday through Friday: No later than the end of the calendar day after which it was received unless circumstances beyond the control of the Permittee (such as an equipment breakdown or truck schedule delay) cause a delay. (b) Saturday: No later than the following Monday unless circumstances beyond the control of the Permittee (such as an equipment breakdown or truck schedule delay) cause a delay. (c) Green waste received by dedicated waste hauling trucks must be removed from the site the same day it is received unless circumstances beyond the control of the Permittee (such as an equipment breakdown or truck schedule delay) cause a delay. <p>If a delay occurs then the Permittee must:</p> <ul style="list-style-type: none"> (d) Mix or cover the green waste pile thoroughly with compost with a Solvita index greater than five, four inch minus screened overs, four inch minus ground woody material or bark, or sawdust the same day it is received; and (e) Remove the green waste from the site by the end of the next day. 	1
13.	<p>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.</p>	Facility-wide

Monitoring and Recordkeeping Requirements

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
14.	The following information must be collected, recorded at the intervals specified below, and readily available on-site for inspection: <ul style="list-style-type: none"> (a) The amount of green waste received and shipped off-site must be recorded for each day of operation; (b) The total amount of green waste not shipped off-site in accordance with Requirements 12(a) – 12(c) must be recorded for each delayed shipping event; (c) The total number of hours each nonroad engine is operated must be recorded for each operation location for each calendar year; (d) The fuel sulfur content of the diesel burned in the diesel engines must be determined and recorded for each fuel delivery. 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; (e) Relocation of equipment identified in this permit must be recorded for each occurrence; (f) Upset conditions and excess emissions must be recorded for each occurrence; (g) Maintenance activities that may affect emissions from the nonroad diesel engines must be logged for each occurrence; and (h) 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.	With the exception of data logged electronically, each record required by this Air Discharge Permit must include the date and the name of the person making the record entry.	Facility-wide
16.	All records required by this Air Discharge Permit must be available on site for a minimum period of no less than three years and must be available for inspection by SWCAA representatives.	Facility-wide

Emission Monitoring and Testing Requirements

Req. No.	Emission Monitoring and Testing Requirements	Equipment/ Activity ID No.
	None	

Reporting Requirements

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
17.	All air quality related complaints, including odor complaints, received by the Permittee must be reported to SWCAA within three days of receipt.	Facility-wide

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
18.	Excess emissions must be reported to SWCAA as follows: <ul style="list-style-type: none"> (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. 	Facility-wide
19.	Deviations from permit conditions must be reported no later than 30 days after the end of the month during which the deviation is discovered.	Facility-wide
20.	The following emission-related information must be reported to SWCAA by March 15 th for the previous calendar year: <ul style="list-style-type: none"> (a) The total number of hours each of the nonroad engines operated at each location; (b) The total amount of green waste not shipped off-site in accordance with Requirements 12(a) – 12(c) must be recorded for each delayed shipping event; and (c) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs). 	Facility-wide

3. General Provisions

Req. No.	General Provisions
A.	For the purpose of ensuring compliance with this ADP/NEP, 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.
B.	The provisions, terms, and conditions of this ADP/NEP 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/NEP survive any transfer of ownership of the source or any portion thereof.
D.	This ADP/NEP must be posted conspicuously at or be readily available near the source.
E.	This ADP/NEP 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.

Req. No.	General Provisions
F.	This ADP/NEP 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/NEP 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/NEP is held to be invalid, all unaffected provisions of the ADP will remain in effect and be enforceable.
I.	No change in this ADP/NEP 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 ensure 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/NEP has been violated or is being violated, nothing in this ADP/NEP 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

Progressive Odor Management Plan

1. Introduction: The purpose of the Progressive Odor Management Plan (POMP) is to address odor impacts of the permittee's facility on neighboring properties. The POMP consists of four levels of corrective action and response to odor nuisances. The POMP does not supersede the requirements in SWCAA 400-040(4) regarding odor, but rather provides a separate regulatory mechanism to assure that odor nuisances are addressed in a timely manner.

2. Identification of Nuisance Odor Problems: Nuisance odors can be identified by the permittee or SWCAA. To be considered a nuisance, odor complaints from neighboring property owners must be verified by the permittee or SWCAA.

3. Response to Nuisance Odor Problems: The permittee will take the following actions to address odor impacts until nuisance odors are reduced to a reasonable minimum as determined by SWCAA:

Level One

Each of the operational aspects that impact odor generation and control will be evaluated by operating personnel as to their contribution to the offensive odor. The primary odor generating operating condition will be corrected or adjusted using existing process management tools to minimize odor generation. The adjustments will be made as quickly as functionally possible. Corrective action must be initiated immediately but no later than 24 hours after the problem is identified. Level One corrective action shall take precedence over other facility operations. If corrective actions require that parts or materials be ordered, the parts or material orders must be expedited if expediting the order will speed resolution of the odor nuisance.

Level Two

If the odor nuisance persists after the operators state that all conditions have been checked and are working appropriately, the permittee must evaluate the odors and the operational factors affecting odor generation and propose new procedures or handling methods with existing process management tools. The proposal must be submitted in writing to SWCAA within five working days after completion of Level One activities and identification of a continuing odor nuisance by the permittee or SWCAA. If SWCAA does not disapprove of the plan within five working days of receipt, the permittee must immediately begin implementation of the proposed new procedures or handling methods at the end of the five working day review period. If SWCAA disapproves of the proposed new procedures or handling methods, SWCAA may require that the plan be modified, or a new plan be submitted. Level Two corrective action must take precedence over other facility operations.

Level Three

If the odor nuisance persists after the completion of Level Two corrective action, and is attributed to specific materials, those materials must no longer be handled at the facility except for incidental amounts for experimentation. Future acceptance of these materials will be subject to New Source Review and approval by SWCAA.

Appendix A

Progressive Odor Management Plan

3. Response to Nuisance Odor Problems (continued):

Level Four

If the odor nuisance persists after all Level One through Level Three options have been exhausted, the permittee must:

- (a) Commission a third-party to observe operations, document and propose process modification options, as well as perform air sampling and evaluation. The evaluation can be done through air odorant chemical sampling, professional odor panels or a local four-part odor panel. The panel would be used to characterize and quantify the odors. If necessary, odor dispersion modeling will be used to project the effectiveness of proposed facility or technology changes.
- (b) Submit the third-party's report to SWCAA within 60 days of initiating Level Four corrective action.
- (c) If persistent nuisance odors are attributed to the lack of, or adequacy of, structures, equipment, or air treatment methods, physical changes must be made to the permittee's facility. Depending on the changes required, New Source Review or other pre-construction permitting may be required prior to making the proposed change. A schedule for implementing these changes must be developed with SWCAA, allowing for normal permitting and construction timelines. The construction must progress as quickly as reasonably possible. Once changes are fully implemented, the permittee must evaluate the effectiveness of the changes and summarize the results of the evaluation in a report to SWCAA.

4. Progress Reports: In addition to the third-party evaluation report required with a Level Four corrective action, the permittee must submit the following reports to SWCAA:

- (a) A report on the progress of any on-going Level One through Level Four corrective actions at least once every five working days until the corrective action is completed.
- (b) A report on the actions taken and an evaluation of the effectiveness of those actions at the completion of any Level One through Level Four corrective action.