

**STATEMENT OF BASIS FOR CITY OF SPOKANE - SPOKANE REGIONAL SOLID WASTE
SYSTEM
CHAPTER 401 AIR OPERATING PERMIT
AOP-3 Renewal #1**

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LIST OF ABBREVIATIONS

BACT	Best available control technology
CEM	Continuous emission monitor
CEMS	Continuous emission monitoring system
CFR	Code of Federal Regulations
CO	Carbon monoxide
COM	Continuous opacity monitor
COMS	Continuous opacity monitoring system
dba	Doing business as
dscf	Dry standard cubic foot
ECOLOGY	Washington State Department of Ecology
EPA	United States Environmental Protection Agency
FCAA	Federal Clean Air Act
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous air pollutant as designated under Title III of FCAA
mg/dscm	Milligrams per dry standard cubic meter
MMBTU	Millions of British thermal units
MRRR	Monitoring, recordkeeping, & reporting requirements
MWC	Municipal waste combustor, also referred to a municipal waste combustor unit
NAA	Nonattainment area
NOC	Notice of Construction
NOx	Oxides of nitrogen
O ₂	Oxygen
O&M	Operation & maintenance
Pb	Lead
PM	Particulate matter
PM ₁₀	Particulate matter, 10 microns or less in size
PSD	Prevention of Significant Deterioration
RACT	Reasonably available control technology
RCW	Revised Code of Washington
RM	EPA reference method from 40 CFR Part 60, Appendix A
SCAPCA	Spokane County Air Pollution Control Authority
scf	Standard cubic foot
SO ₂	Sulfur dioxide
SO _x	Oxides of sulfur
VOC	Volatile organic compounds
WAC	Washington Administrative Code

DEFINITIONS OF WORDS AND PHRASES

Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations.

Administrator	The administrator of the United States Environmental Protection Agency or her/his designee [WAC 173-401-200(12), 9/16/02]
Chapter 401 Permit	Any permit or group of permits covering a source, subject to the permitting requirements of Chapter 173-401 WAC, that is issued, renewed, amended, or revised pursuant to Chapter 173-401 WAC [WAC 173-401-200(5), 9/16/02]
Emission Limitation	A requirement established under the FCAA or Chapter 70.94 RCW which limits the quantity, rate or concentration of emissions of air contaminants on a continuous basis, including any requirement relating to the operation or maintenance of a source to assure continuous emission reduction and any design, equipment work practice, or operational standard promulgated under the FCAA or Chapter 70.94 RCW [WAC 173-400-030(22), 1/10/05]
Emissions Unit	Any part of a stationary source or source which emits or would have the potential to emit any pollutant subject to regulation under the Federal Clean Air Act, Chapter 70.94 RCW, or 70.98 RCW [WAC 173-400-030(23), 1/10/05]
Federal Clean Air Act	Federal Clean Air Act. also known as Public Law 88-206, 77 Stat. 392. December 17, 1963, 42 U.S.C. 7401 et seq., as last amended by the Clean Air Act Amendments of 1990, P.L. 101-549, November 15, 1990 [WAC 173-401-200(13), 9/16/02]
Opacity	the degree to which an object seen through a plume is obscured, stated as a percentage [WAC 173-400-030(51), 1/10/05]
PM Standard	an emission limitation on the amount of particulate matter an emissions unit may emit, generally expressed in terms of grains per dry standard cubic foot, pounds per hour, or some other concentration or emission rate.
Visible Emissions Standard	an emission limitation on visible emissions expressed in percent opacity

**STATEMENT OF BASIS FOR CITY OF SPOKANE
SPOKANE REGIONAL SOLID WASTE SYSTEM WASTE-TO-ENERGY FACILITY
CHAPTER 401 AIR OPERATING PERMIT
AOP-3 RENEWAL #1**

City of Spokane - Spokane Regional Solid Waste System (SRSWS) owns a "Waste-to-Energy" (WTE) municipal waste combustor (MWC) facility that is used to burn the majority of municipal solid waste generated in Spokane County. The facility is classified as a major source, as defined in Chapter 173-401 WAC, due to potential emissions of oxides of nitrogen, sulfur dioxide, carbon monoxide, non-methane hydrocarbons, and hazardous air pollutants. As a major source, SRSWS is required to apply for an operating permit under SCAPCA's Title V air operating permit program as established in Chapter 173-401 WAC. WAC 173-401-700(8) requires that at the time a draft permit is issued under the Title V program, a statement be provided setting forth the legal and factual basis for permit conditions including reference to the applicable statutory or regulatory provisions for the conditions. This document provides the basis for the draft permit for SRSWS.

The permit is organized into sections. The first section contains standard terms and conditions. This section is basically the same for all permits issued by SCAPCA. For this permit, some new conditions have been added to this section. These conditions are noted as such with a footnote¹. The second section contains applicable requirements that apply to the facility, along with monitoring, recordkeeping, and reporting requirements sufficient to assure compliance with each applicable requirement. This section is divided into subsections to address different emission units or classes of emission units. The third section is unique to this permit, containing streamlined permit conditions. The fourth and final section of the permit addresses requirements that have been deemed inapplicable to the source or to emission units located at the source, i.e., the permit shield per WAC 173-401-640(2).

After a brief summary of operations at the facility, the format of this Statement of Basis will follow that of the permit with the standard terms and conditions discussed first, followed by the applicable requirements, streamlined conditions, and finally, the permit shield.

FACILITY SUMMARY

SRSWS's facility burns up to about 950 tons per day of municipal solid waste. The NOC and PSD applications identified the facility as having a nominal capacity to burn 800 tons per day of municipal solid waste, based on a heat value of 5,500 BTU/lb of waste, which is equivalent to 8.8e9 BTU/day. The average heat value of the waste burned at the SRSWS is 4,500-4,800 BTU/lb. With the lower heat value, SRSWS is able to burn more than 800 tons of municipal solid waste per day and remain within the nominal capacity of the facility, in terms of BTU equivalency (i.e., stay below 8.8e9 BTU/day). Natural gas is used as supplemental fuel during start up, shut downs, and other periods when additional heat input is needed to maintain proper combustion. The process involves:

- the receipt of municipal solid waste;
- some sorting of waste. There are special areas on the tipping floor for yard and garden waste, sheetrock, and large appliances. There is a separate area where recyclables and household hazardous wastes are collected;
- municipal solid waste is burned in the two combustors (the yard and garden waste is generally

¹ This requirement has been added to the standard terms and conditions of the SRSWS's permit. It has not been in other permits issued by SCAPCA to date because it applies to this facility only. This requirement comes from either the approved NOC for the facility, the PSD permit, or the state municipal solid waste incinerator rule, Chapter 173-434 WAC.

transported to the regional compost facility for composting, the sheetrock is landfilled, appliances and other recyclables are recycled, and household hazardous waste is disposed of appropriately);

- heat from the burning of waste is used to generate electricity which is sold; and
- ash is transported to a landfill.

Emissions from the facility include combustion emissions from the burning of municipal solid waste, and fugitive emissions from handling municipal solid waste and ash and from traffic on roadways.

The facility’s significant emission units are listed in Table 1.

Table 1 – Significant Emission Units

PROCESS NUMBER (as listed in the permit application)	DESCRIPTION	AIR POLLUTION CONTROL
1A	Babcock and Wilcox boiler with Von Roll grates, rated at 183.33 MMBTU/hr (NOC #170) (PSD #88-1B)	Combustion Control, Ammonia Injection (NOC #1241), Spray Dry Absorber, Baghouse, Carbon Injection System (NOC #1057)
1B	Babcock and Wilcox boiler with Von Roll grates, rated at 183.33 MMBTU/hr (NOC #170) (PSD #88-1B)	Combustion Control, Ammonia Injection (NOC #1241), Spray Dry Absorber, Baghouse, Carbon Injection System (NOC #1057)
	Lime Silo	Baghouse
	Ash Handling System	Scrubber (NOC #934)

The facility began operation in 1991. Both a Notice of Construction (NOC #170) and a Prevention of Significant Deterioration permit (PSD #88-1B) were approved for the facility prior to start-up. After the facility commenced operation, SCAPCA approved NOC #934 for the installation of a scrubber on the ash handling system, NOC #1057 for a carbon injection system, and NOC #1241 for a system that converts urea to ammonia used in the ammonia injection system. In addition, the facility is subject to the requirements given in Chapter 173-434 WAC, “Solid Waste Incinerator Facilities” and the requirements from 40 CFR 60, Subpart Cb, which are incorporated into SCAPCA Regulation I, Section 6.17, “Standards for Municipal Solid Waste Combustors.”

Insignificant Emission Units

Insignificant emission units (IEUs) include any activity or emission unit located at a major source which qualifies as insignificant under the criteria listed in WAC 173-401-530. A list of the IEUs, identified in the permit application, is presented below in Table 2. In order to remain an IEU, emissions from units designated insignificant based solely on WAC 173-401-530(1)(a) must remain below threshold levels.

Insignificant emission units are subject to the generally applicable requirements (i.e., facility-wide emission limitations). According to WAC 173-401-530, testing, monitoring, recordkeeping, and reporting are not

required for insignificant emission units unless determined by the permitting authority to be necessary to assure compliance or unless it is otherwise required by a generally applicable requirements in the State Implementation Plan (SIP). SCAPCA has determined that testing, monitoring, recordkeeping, and reporting are not necessary for the insignificant emission units presented in Table 2 to assure compliance with the generally applicable requirements. SCAPCA's determination was based on the following:

- SCAPCA has not documented a violation of any of the generally applicable requirements in the past from the list of IEUs in Table 2 (i.e., the IEUs have had a consistent compliance history); and
- Most of the IEUs are tanks that emit small quantities of pollutants; and
- The majority of the IEUs are emission units or activities that are not directly vented (i.e., do not have an exhaust stack).

Table 2

Emission Unit Description	Process #	Basis / Justification for IEU Designation
Bulk Waste Oil Tank	2A	WAC 173-401-530(2)(b)
Diesel Fuel Storage Tank	2B	WAC 173-401-530(2)(b)
Lube Oil Vapor Extraction Vents	2C	WAC 173-401-530(4)(d)
Bearing Drain Enlargement Vents	2C	WAC 173-401-530(4)(d)
Parts Cleaner/Degreaser	2D	WAC 173-401-530(4)(d)
Muriatic Acid Tank	2F	WAC 173-401-530(4)(p)
Balanced Polymer Tank	2F	WAC 173-401-533(2)(c)
Phosphoric Acid Tank	2F	WAC 173-401-533(2)(s)
Caustic Tank	2F	WAC 173-401-533(2)(s)

Note: The application also designated the plant roads as being insignificant on the basis of threshold limits. However, because the plant roads have applicable requirements, (see Section II.C of the permit), the roads are not considered insignificant.

STANDARD TERMS AND CONDITIONS

This section of SRSWS's permit contains the standard terms and conditions that apply to all sources in SCAPCA's Title V program. These include all terms required in Chapter 173-401 WAC as well as requirements from other air quality laws and regulations. For this facility, a few new terms have been added to this section. These additional terms are footnoted in this document to facilitate their identification. This section is organized in seven subsections including:

- PERMIT ADMINISTRATION;
- INSPECTION & ENTRY;
- EMERGENCY PROVISIONS;
- GENERAL MONITORING, RECORDKEEPING, & REPORTING;
- COMPLIANCE CERTIFICATION;
- TRUTH AND ACCURACY OF STATEMENTS AND DOCUMENTS AND TREATMENT OF

DOCUMENTS; and
APPLICABLE WHEN TRIGGERED REQUIREMENTS.

A discussion of each subsection follows. The requirements in each section are briefly discussed, along with the citations for each requirement. Using the same methodology as the permit, requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are not enforceable by EPA or citizens. Although, in and of itself, Chapter 173-401 WAC is not federally enforceable, the requirements of this regulation are based on federal requirements for the operating permit program. Upon issuance of the original permit for the facility, the terms based on Chapter 173-401 WAC became federally enforceable for the source. These terms will be replaced with the updated terms given in this renewal permit.

NOTE: The filing date for each state and local requirement is also given. The filing date may be important if an earlier version of the requirement is in the State Implementation Plan (SIP). In many instances, a revision may have occurred within a section that does not affect the requirement being cited. If this is the case, the most recent filing date is given, along with the SIP version date in parentheses, and the requirement is federally enforceable. If a change was made in the requirement, both the earlier, SIP approved, requirement and the most recent requirement would go in the permit. The version in the SIP would be federally enforceable, and the more recent version would be enforceable at the state or local level.

If a new rule or a newer version of a rule has been submitted to EPA for inclusion in the SIP and EPA has proposed, but not issued, approval, the permit will be drafted so that when EPA approval does occur, the requirement will become federally enforceable.

Permit Administration

Below are standard terms included in the subsection, Permit Administration. Generally the language tracks the rule language closely with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirement.

1. Federal Enforceability. All permit conditions are federally enforceable unless specified in the permit as a state or local only requirement. State or local only requirements are not enforceable by EPA or by citizens. [WAC 173-401-625, 10/4/93]
2. Duty to Comply. The permittee must comply with the terms and conditions of the permit. [WAC 173-401-620(2)(a), 10/4/93]
3. Schedule of Compliance. The permittee must continue to comply with all applicable requirements and must comply with new requirements on a timely basis. [WAC 173-401-630(3), 10/4/93]
4. Need to Halt or Reduce Activity Not a Defense. The permittee cannot use the fact that it would have been necessary to halt or reduce an activity as a defense in an enforcement action. [WAC 173-401-620(2)(b), 10/4/93]
5. Permit Actions. This term discusses modification, revocation, reopening, and/or reissuance of the permit for cause. If SRSWS files a request to modify, revoke, reissue, or terminate the permit, the request does not stay any permit condition, nor does notification of planned changes or anticipated noncompliance. [WAC 173-401-620(2)(c), 10/4/93]
6. Reopening for Cause. This term lists instances when the permit must be reopened and revised, including times when additional requirements become applicable, when the permit contains

mistakes, or when revision or revocation is necessary to assure compliance with applicable requirements. [WAC 173-401-730, 10/4/93]

7. Emissions Trading. No permit revision will be required, under any approved, economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit. [WAC 173-401-620(2)(g), 10/4/93]

8. Property Rights. The permit does not convey any property rights of any sort, or any exclusive privilege. [WAC 173-401-620(2)(d), 10/4/93]

9. Duty to Provide Information. The permittee must furnish, within a reasonable time to SCAPCA, any information, including records required in the permit, that is requested in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. [WAC 173-401-620(2)(e), 10/4/93]

10. Duty to Supplement or Correct Application. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, must promptly submit such supplementary facts or corrected information. The permittee must also provide information as necessary to address any new requirements that become applicable after the date a complete application has been filed but prior to the release of a draft permit. [WAC 173-401-500(6), 10/4/93]

11. Permit Fees. The permittee must pay fees as a condition of this permit in accordance with SCAPCA's fee schedule. [WAC 173-401-620(2)(f), 10/4/93]

12. Severability. If any provision of the permit is held to be invalid, all unaffected provisions of the permit will remain in effect and enforceable. [WAC 173-401-620(2)(h), 10/4/93]

13. Permit Appeals. The permit or any conditions in it may be appealed only by filing an appeal with the pollution control hearings board and serving it on SCAPCA within thirty days of receipt pursuant to RCW 43.21B.310. This provision for appeal is separate from and additional to any federal rights to petition and review under §505(b) of the FCAA, including petitions filed pursuant to 40 CFR 70.8(c) and 70.8(d). [WAC 173-401-620(2)(i)] [WAC 173-401-735(1), 10/4/93]

14. Permit Renewal and Expiration. The permit is in effect for five years. The permittee's right to operate this source terminates with the expiration of the permit unless a timely and complete application for renewal is submitted. Chapter 173-401-710(1) allows SCAPCA to set, in the permit, the due date for the renewal as long as it is no more than 18 months and no less than six months prior to expiration of the permit. SCAPCA specifies in the permit that the renewal must be submitted no more than 18 months and no less than 12 months prior to the permit expiration. The facility may continue to operate subject to final action by SCAPCA on the application, as long as a timely and complete application has been filed and all requested additional information necessary to process the permit is submitted by the deadline specified in writing by SCAPCA. [WAC 173-401-610, 10/4/93] [WAC 173-401-705, 10/4/93] [WAC 173-401-710(1) & 3, 9/16/02]

15. Permit Continuation. The permit will not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. [WAC 173-401-620(2)(j), 10/4/93]

16. Permit Shield. Compliance with a permit condition is deemed compliance with the applicable requirements identified in the permit upon which that condition is based, as of the date of permit

issuance except that this shield will not affect the following:

- a. The provisions of Section 303 of the FCAA (emergency orders), including the authority of the Administrator under that section;
- b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The ability of EPA to obtain information from the permittee pursuant to Section 114 of the FCAA;
- d. The ability of SCAPCA to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in Chapter 252, Laws of 1993.

[WAC 173-401-640(1) & (4), 10/4/93]

(See PERMIT SHIELD Section for requirements that have been deemed inapplicable to this facility.)

Inspection and Entry

This subsection of the permit contains requirements for allowing authorized access to a facility for purposes of assuring/determining compliance with air quality requirements. Generally the language tracks the rule language closely with only minor changes for clarity and conciseness. There is no intent to alter the effect of the requirements.

17. Inspection and Entry. No person shall obstruct, hamper, or interfere with any authorized representative of SCAPCA who requests entry for the purpose of inspection, and who presents appropriate credential; nor shall any person obstruct, hamper or interfere with any such inspection. Unannounced inspections by local, state, and federal air pollution control agencies may occur, whereby, no more than 10 minutes are allowed for the permittee to provide an escort. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow SCAPCA, or an authorized representative, to perform the following:

- a. Enter upon the permittee's premises where a chapter 401 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), or operations regulated or required under this permit;
- d. Enter the facility premises at reasonable times to inspect equipment and/or records specific to the control, recovery, or release of contaminants into the atmosphere, in accordance with SCAPCA Regulation I, Article II and RCW 70.94.200; and
- e. As authorized by WAC 173-400-105 and the FCAA, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements.

[WAC 173-401-630(2), 10/4/93] [RCW 70.94.200, 1998 - STATE/LOCAL ONLY] [SCAPCA Regulation I, Section 2.02.E, 3/4/04 – STATE/LOCAL ONLY] [NOC #170, Condition G.7, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06] [NOC #1241, Condition 6, 10/8/04 – STATE / LOCAL ONLY]

Nothing in this condition shall limit the ability of EPA to inspect or enter the premises of the permittee under Section 114 of the FCAA. [WAC 173-401-640(4)(d), 10/4/93]

Failure to allow access to the facility is grounds for revocation of PSD approval #PSD-88-1B [PSD-88-1B, Condition 33, 9/1/89 as revised on 2/9/96]

Emergency Provisions

Below are standard terms that are included in the subsection, Emergency Provisions. This subsection of the permit contains provisions, governing emergencies and the treatment of periods of emissions in excess of applicable standards, when such emissions stem from unforeseeable events or arise from start-up, shutdown or maintenance, where design or operational practices could not preclude such emissions. Generally, the language tracks the rule language closely, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements.

Because SRSWS has emergency provisions that are in addition to those that apply to other SCAPCA air operating permit sources, there are conditions in the section that do not appear in other source's permits. These conditions are identified by a footnote explaining this.

18. Emergency Plan¹. The permittee must meet the following:

a. The permittee must develop a solid waste emergency plan, containing, at a minimum, the elements listed in SCAPCA Order #98-01, Condition 1. The plan may be an appendix to a more comprehensive plan addressing issues beyond operation of the waste-to energy plant during an emergency or may be a stand-alone document. Similarly, the plan may be developed as a stand-alone document and later incorporated into a more comprehensive plan; [SCAPCA Order #98-01, Condition 1, 4/22/98]

b. Once approved, the plan must be followed. Any changes to the plan must be submitted to SCAPCA prior to implementing the change(s). If SCAPCA does not object to the changes within 3 working days of receipt or if SCAPCA approves the changes within less than 7 working days (whichever comes first), the changes may be implemented; [SCAPCA Order #98-01, Condition 2, 4/22/98]

c. The official in charge of a regional emergency (i.e., the person in charge of all areas of the emergency) can override any part of the emergency plan required under this order, if deemed necessary to effectively respond to an emergency. Notification of such a decision must be made consistent with SCAPCA Order #98-01, Condition 1.b, i.e., if the decision results in contravention of applicable air quality requirements under the Federal Clean Air Act, as defined in Chapter 173-400 WAC (9/13/96), or Chapter 70.94 RCW (1997); and [SCAPCA Order #98-01, Condition 3, 4/22/98]

d. During a declared emergency, SCAPCA will identify and make available an agency individual with authority to act for SCAPCA. [SCAPCA Order #98-01, Condition 4, 4/22/98]

19. Emergencies. An emergency, as defined in WAC 173-401-645(1), constitutes an affirmative defense to an enforcement action for non-compliance with a technology-based emission limitation if all the conditions of WAC 173-401-645(3) and (4) are met and the permittee submits notification of the emergency to SCAPCA in accordance with Condition 32-Prompt Reporting of Deviations and submits a report in accordance with Condition 25-Emergency, Excess Emissions, Upset Conditions and/or Breakdown Reports below.

This provision is in addition to the affirmative defense for unavoidable excess emissions found in Condition 20-Excess Emissions and Condition 21-Report of Breakdown below. [WAC 173-401-645, 10/4/93] [WAC 173-401-615(3)(b), 9/16/02]

20. Excess Emissions. If excess emissions due to startup or shutdown conditions, scheduled maintenance, or upsets are determined to be unavoidable under the procedures and criteria in WAC 173-400-107, such emissions shall be excused and not subject to penalty. The permittee shall submit a notification of the excess emissions in accordance with Condition 32-Prompt Reporting of Deviations below, and upon request by SCAPCA, submits a report in accordance with Condition 25-Emergency, Excess Emissions, Upset Conditions and/or Breakdown Reports below. [WAC 173-400-107, 8/20/93] [WAC 173-401-615(3)(b), 9/16/02]

If upon reviewing the available information, SCAPCA determines that continued operation of any emissions unit is likely to cause a significant risk to the public, it may order an immediate shutdown of the emissions unit. [WAC 173-434-190(2), 12/22/03] [PSD-88-1B, Condition 28, 9/1/89 as revised on 2/9/96]

21. Report of Breakdown for State/Local Only Requirements in SCAPCA Regulation I. If pollutants are emitted in excess of the limits established by SCAPCA Regulation I as a direct result of unavoidable upset conditions or unavoidable and unforeseeable breakdown of equipment or control apparatus, SCAPCA may excuse the permittee from penalties if the permittee submits a notification of the breakdown is reported in accordance with Condition 32 below and upon request by SCAPCA's control officer, submits a report in accordance with Condition 25-Emergency, Excess Emissions, Upset Conditions and/or Breakdown Reports.

The control officer, upon receipt of a report from the permittee describing a breakdown, may:

- a. Allow operation exempt from penalties, but only for a limited time period, after which the permittee will be required to comply with SCAPCA Regulation I or be subject to the penalties in SCAPCA Regulation I, Section 2.11. Such an exemption may be withdrawn if the exempt operation becomes a cause of complaints; or
- b. Require that the permittee curtail or cease operations until repairs are completed if the quantity of pollutants or the nature of the pollutants could cause damage.

Note: This provision does not provide relief against federally enforceable applicable requirements. [SCAPCA Regulation I, Section 6.08, 3/4/04- STATE/LOCAL ONLY]

22. Response to Breakdown or Upset Condition¹. During any breakdown or upset condition, the permittee must promptly reduce plant emissions by whatever means necessary to assure that the emission limitations are not exceeded. [NOC #170, Condition D.6, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06]

23. Monitoring System Malfunctions. The permittee may be temporarily exempted from monitoring and reporting requirements, required under the provisions of Chapter 173-400 WAC during periods of monitoring system malfunctions, provided the permittee can demonstrate that the malfunction was unavoidable and repaired as expeditiously as practicable.

Each condition in Section II.F – MONITORING, RECORDKEEPING, & REPORTING REQUIREMENTS to which this condition applies shall clearly indicate that this monitoring system malfunction provision applies. [WAC 173-400-105(5)(h), 8/25/02(8/20/93)* - see note on page 5]

It should be noted that the original AOP for the facility, issued by SCAPCA on July 23, 2001, contained a provision in the Standard Terms and Conditions (Condition 39 in original permit) which contained minimum data recovery requirements for monitoring data required to be collected under the permit. However, this standard term has been removed from the renewed permit because EPA informed SCAPCA that a broad data recovery requirement should not be placed on all monitoring terms in the permit, which could potentially reduce the stringency of a federal requirement in the permit. EPA's position is that SCAPCA does not have the authority to alter any federal requirement to collect and/or recover monitoring data. EPA recommended that SCAPCA either place specific data recovery requirements into each specific non-federal monitoring requirement or specify which specific non-federal requirements would be covered by a general data recovery condition. SCAPCA has elected to alter the data recovery requirements to excuse the permittee from specific non-federal monitoring and reporting requirements during periods of monitoring system malfunctions. The specific conditions to which this condition applies clearly indicate that this monitoring system malfunction provision applies.

24. Corrective Actions for Excess Emissions¹. In the event that monitoring or test data show that the emissions from the facility exceed any emission limitation of the approval of NOC #170, the permittee must take immediate corrective action to bring the plant's emissions within that limitation. Emissions in excess of those allowed will be cause for SCAPCA to order an immediate reduction in fuel feed rate or to take other appropriate abatement action. Excess emissions indicated by the continuous emission monitoring system will be construed as a basis for a violation unless the continuous emission monitoring system is found to be producing erroneous data. [NOC #170, Condition G.1, 3/3/88 as modified on 8/31/89, 11/19/97, 4/23/98, & 8/8/06]

25. Emergency, Excess Emissions, Upset Conditions and/or Breakdown Reports¹. In the event of emergencies, excess emissions, upset conditions, and/or breakdowns (see Conditions 19, 20, & 21 above), if requested by SCAPCA, or if required under an applicable requirement, the permittee must submit a full written report including:

- a. A description of the event, including the known causes;
- b. Steps taken to mitigate emissions;
- c. Steps taken to repair the breakdown, if applicable, including a schedule to complete the repairs; and
- d. Corrective actions taken, including preventative measures to be taken to minimize or eliminate the chance of recurrence

[WAC 173-615(3)(b), 10/4/93; 9/16/02] [WAC 173-400-107(3), 8/20/93] [SCAPCA Regulation I, Section 6.08.A.2, 3/4/04 – STATE/LOCAL ONLY] [PSD-88-1B, Condition 28, 9/1/89 as revised on

General Monitoring, Recordkeeping, & Reporting

Below are standard terms included in the subsection, General Monitoring, Recordkeeping, & Reporting. This subsection contains general requirements for monitoring, recordkeeping, and reporting. Monitoring, recordkeeping, & reporting requirements (MRRR) that apply to specific emission standards or specific emission activities are located in the second section of the permit. Generally, the language tracks the rule language closely, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements. However, in the terms, Monitoring Reports and Data Recovery, attempts have been made to clarify SCAPCA's expectation of how the requirements will be met. The discussions below provide more detail on these efforts and the regulatory authority relied upon to establish the terms.

Because SRSWS has some general monitoring, recordkeeping, and reporting provisions that are in addition to those that apply to other SCAPCA air operating permit sources, there are conditions in the section that do not appear in other source's permits. These conditions are identified by a footnote explaining this.

26. Records of Required Monitoring Information. This term details what records must be kept relating to monitoring. [WAC 173-401-615(2)(a), 9/16/02]

27. Permanent Shutdown of an Emission Unit. If an emission unit is permanently shut down, thereby rendering existing permit terms and conditions irrelevant, the permittee is not required, after the shutdown, to meet any monitoring, recordkeeping, and reporting requirements, no longer applicable for that emission unit, once any residual requirements have been met. All records, relating to the shut down emission unit, generated while the emission unit was in operation, must be kept in accordance with Conditions 26-Records of Required Monitoring Information and 29-Retention of Records.

Contemporaneous with the shutdown of the emission unit, the permittee must record the date that operation of the emission unit ceased, using a log or file on site. The shutdown date must be reported to SCAPCA on the monitoring report, required under Condition 30-Monitoring Reports, covering the period during which the shutdown occurred. [WAC 173-401-725(4)(a), 10/4/93] [WAC 173-401-650(1)(a), 10/4/93]

28. Records of Changes. The permittee must keep records of changes made at the source that result in emissions of a regulated air pollutant, subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from such a change. [WAC 173-401-615(2)(b), 9/16/02]

29. Retention of Records. The permittee must keep monitoring data and support information for a period of five years. [WAC 173-401-615(2)(c), 9/16/02]

30. Monitoring Reports. Unless a shorter time period is specified by this permit, reports of any required monitoring shall be submitted to SCAPCA as follows:

- Monitoring report covering the period from January 1 – June 30 each year shall be submitted to SCAPCA and postmarked no later than July 30 of the same calendar year; and
- Monitoring report covering the period from July 1 – December 31 each year shall be submitted to SCAPCA and postmarked no later than April 15 of the following calendar year.

The reports must be certified as required in Condition 36-Report Submittals. Except that where this permit requires reporting more frequently than once every six months, the responsible official's certification need only be submitted once every six months, covering all required reporting since the date of the last certification. The report must include the following information for the reporting period:

- a. A summary of monitoring results;
- b. Clear identification of all instances of deviations from permit requirements;
- c. Information required to be reported under Conditions 11M and 12M of this permit;
- d. A summary of the non-typical wastes received in accordance with Condition 13M of this permit; and
- e. Any permanent emission unit shutdowns and 26-Permanent Shutdown of an Emission Unit, respectively.

[WAC 173-401-615(3)(a), 9/16/02], [SCAPCA Regulation I, Section 6.17.I, 1/13/99] [WAC 173-401-615(1) & (2), 9/16/02]

31. Reporting of Planned Startups, Shutdowns, Etc¹. For a planned condition, such as a startup or shutdown, the condition must be reported to SCAPCA not less than 24 hours in advance of its occurrence. [WAC 173-434-190(1), 12/22/03] [PSD-88-1B, Condition 28, 9/1/89 as revised on 2/9/96]

32. Prompt Reporting of Deviations. The permittee must promptly report deviations from permit requirements, including those attributable to upset conditions as defined in this permit and excess emissions due to emergencies, breakdowns, startups, shutdowns, malfunctions, and scheduled maintenance. Reports of deviations must include the probable cause of such deviations, and any corrective actions or preventative measure taken. Prompt means reporting according to the shortest time period, which applies to the situation, as listed below:

- a. In the case where the deviation represents a potential threat to human health or safety, the deviation shall be reported by phone or facsimile as soon as possible, but no later than 12 hours after the deviation is discovered;
- b. In the case where an affirmative defense is sought under Condition 19-Emergencies, Condition 20-Excess Emissions and/or Condition 21-Report of Breakdown for State/Local Only Requirements in SCAPCA Regulation I, the deviation shall be reported by phone or facsimile as soon as possible but no later than the end of the next working day; and
- c. For all other deviations, as part of the monthly monitoring report, required under Condition 10M, covering the month in which the deviation is discovered.

The permittee shall maintain a contemporaneous record of all deviations.

[Streamlined condition for the notification requirements in: WAC 173-401-615(3)(b), 9/16/02; WAC 173-401-645(3)(d), 10/4/93; WAC 173-400-107(3), 8/20/93; SCAPCA Regulation I, Section 6.08.A.1, 3/4/04 – STATE/LOCAL ONLY; NOC #170, Condition D.6, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06; WAC 173-434-190(1)(b), 12/22/03; and PSD-88-1B, Condition 28, 9/1/89 as revised on 2/9/96]

33. Emission Inventory. The permittee must submit an inventory of emissions from the source each year and must maintain records sufficient to document reported emissions. [WAC 173-400-105(1), 9/13/96 (8/20/93)] [WAC 173-434-200, 9/17/90] [PSD-88-1B, Condition 28, 9/1/89 as modified on 2/9/96]

34. Notification of Reports¹. Reports of any independent facility source testing, ambient air quality monitoring and/or studies relating to air quality other than those specified in the approval of NOC #170 must be reported to SCAPCA, and if requested in writing by SCAPCA, submitted within 30 days. This requirement includes capacity, energy recovery and putrescible matter and unburned carbon test required by the operation and maintenance contract. [NOC #170, Condition E.4, 3/3/88 as modified on 8/31/89, 11/19/97, 4/23/98, & 8/8/06]

35. WAC 173-401-530(1)(a) Insignificant Emission Units. Emissions from units designated insignificant based solely on WAC 173-401-530(1)(a) must remain below threshold levels. A table listing these units and activities is presented below. Upon request from SCAPCA, the permittee must demonstrate that the actual emissions from such a unit or activity are below the applicable emission thresholds. [WAC 173-401-530(6), 9/16/02]

Emission Units Designated Insignificant Solely on Basis of Emission Thresholds (WAC 173-401-530(1)(a))
<ul style="list-style-type: none">• Lube Oil Vapor Extraction Vents• Bearing Drain Enlargement Vents• Parts Cleaner/Degreaser• Muriatic Acid Tank

36. Report Submittals. This term provides the address to which reports must be sent and requires all reports to be certified by a responsible official. [WAC 173-401-520, 10/4/93]

37. SCAPCA Regulation I, Section 6.17 Minimum Data Requirements¹. For compliance with MWC limits in this permit for SO₂, NO_x, CO, municipal waste combustor unit baghouse inlet temperature, and municipal solid waste combustor unit load level, data from the monitoring system(s) must meet the following:

- a. valid hourly averages for SO₂, NO_x, CO, municipal waste combustor unit baghouse inlet and municipal solid waste combustor unit load level must be obtained for at least 75% of the operating hours per day for 90% of the operating days per calendar quarter that each unit is combusting municipal solid waste;
- b. at least two data points per hour must be used to calculate the one-hour arithmetic averages for SO₂, NO_x, CO, municipal waste combustor unit baghouse inlet and municipal solid waste combustor unit load level;
- c. all valid continuous emission monitoring system data must be used in calculating average emissions concentrations and % reductions (if applicable) even if the minimum continuous emission monitoring system data requirements of a. above are not met;

d. when SO₂, NO_x, or CO emissions data are not obtained because of continuous emissions monitoring system breakdown, repairs, calibration checks, and zero and span adjustments, emissions data must be obtained by using other monitoring systems as approved by EPA or SCAPCA or by RM 19 (for SO₂ or NO_x) or RM 10 (for CO) to provide, as necessary, valid emissions data for a minimum of 75% of the hours per day for 90% of the days per calendar quarter that the unit is operated and combusting municipal solid waste.

[SCAPCA Regulation I, Section 6.17.H, 1/13/99]

38. Rendering Device or Method Inaccurate. SRSWS may not render inaccurate any monitoring device or method required under Chapter 70.94 or 70.120 RCW, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto. [WAC 173-400-105(8), 9/20/93] [WAC 173-400-105(8), 1/10/05 – STATE/LOCAL ONLY]

Compliance Certification

As part of SCAPCA's Title V program, sources are required to submit annual compliance certifications. (SCAPCA may require more frequent certifications if the source is out of compliance or if an underlying requirement specifies more frequent submittals.) This subsection of the permit addresses the details of these compliance certification submittals, including how often submittals must occur, what the submittals must contain and to whom the certifications must be sent. Generally, the language tracks the rule language closely, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements.

39. Compliance Certification Submittals. This term covers the frequency for submitting compliance certifications. [WAC 173-401-630(5)(a), 10/4/93]

40. Compliance Certification Contents. This term describes what must be included in each compliance certification. [WAC 173-401-630(5)(c), 10/4/93] [WAC 173-401-530(c), 9/16/02]

41. Submittal to EPA. This term requires that certifications be sent to EPA as well as SCAPCA. [WAC 173-401-630(5)(d), 10/4/93]

Truth and Accuracy of Statements and Documents and Treatment of Documents

Below are standard terms contained in the subsection, Truth and Accuracy of Statements and Documents and Treatment of Documents. Generally, the language tracks the rule language closely, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements.

42. False Information. SRSWS may not make any false statement, representation, or certification in any form, notice, or report required under Chapter 70.94 or 70.120 RCW or any ordinance, resolution, regulation, permit, or order in force pursuant thereto. In addition, this term prohibits willfully making false statements to SCAPCA in any matter within SCAPCA's jurisdiction. [WAC 173-400-105(7), (8/20/93)] [WAC 173-400-105(7), (1/10/05) – STATE/LOCAL ONLY] [SCAPCA Regulation I, 2.08.A & E, 3/4/04 - STATE/LOCAL ONLY]

43. Alteration of Documents. This term prohibits the reproduction or alteration of any document issued by SCAPCA, if the purpose of such is to evade or violate any requirement. [SCAPCA Regulation I, 2.08.B, 3/4/04 - STATE/LOCAL ONLY]

44. Availability of Documents. Any order required to be obtained by SCAPCA Regulation I or II must

be available on the premises designated on the order. [SCAPCA Regulation I, 2.08.C, 3/4/04 - STATE/LOCAL ONLY]

45. Posting of Notices. Notices which SCAPCA requires to be displayed shall be posted. The permittee may not mutilate, obstruct, or remove any notice unless authorized to do so by the SCAPCA. [SCAPCA Regulation I, 2.08.D, 3/4/04 - STATE/LOCAL ONLY]

Applicable When Triggered Requirements

The subsection, Applicable When Triggered Requirements, contains requirements that do not apply to the facility unless certain activities at the site trigger the requirement. SCAPCA has included these requirements in the permit, either because they are often triggered at sources or are important enough that their inclusion in the permit is warranted. Generally the language tracks the rule language closely with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements. However, in the term, Source Testing, language has been added to clarify what an approved test method is, as the rule does not elaborate on what "approved" means. The discussion below provides more detail in regards to this.

Because SRSWS has some provisions that are in addition to those that apply to other SCAPCA air operating permit sources, there are conditions in the section that do not appear in other source's permits. These conditions are identified by a footnote explaining this.

46. New Source Review. Prior to the establishment of a new source, including modifications, the permittee may be required to file and obtain approval under SCAPCA's Notice of Construction program. [WAC 173-400-110, -112, -113, 8/15/01 – STATE/LOCAL ONLY] [WAC 173-400-110, -112, -113, 8/20/93] [Chapter 173-460 WAC, 7/21/98 - STATE/LOCAL ONLY] [SCAPCA Regulation I, Article V, 3/4/04 – STATE/LOCAL ONLY] [NOC #170, Condition G.9, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06]

47. Replacement or Substantial Alteration of Existing Control Equipment. Prior to replacing or substantially altering existing control equipment, the permittee shall file and obtain approval under SCAPCA's Notice of Construction program. [WAC 173-400-114, 8/15/01 - STATE/LOCAL ONLY] [SCAPCA Regulation I, Article V, 3/4/04 - STATE/LOCAL ONLY]

48. Demolition and Renovation (Asbestos). The permittee must comply with applicable local, state, and federal requirements regarding demolition and renovation. [40 CFR Part 61 Subpart M, 2001] [WAC 173-400-075, 7/11/02] [SCAPCA Regulation I, Article IX, 2/5/98 - STATE/LOCAL ONLY]

49. Reasonable Precautions During Construction. The permittee must take reasonable precautions to prevent particulate matter from becoming airborne during construction, alteration, repair or demolition of any building, its appurtenances or a road. Examples of reasonable precautions are provided in Condition 1M.b.i of the permit. [SCAPCA Regulation I, Section 6.05.C, 3/4/04(11/12/93)* - see note on page 5)]

50. Engine Idling During Construction¹. During construction, engine idling is not allowed when vehicles are not directly in use. [NOC #170, Condition C.11, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06]

51. Source Testing. To demonstrate compliance Ecology or SCAPCA may conduct or require that a test be conducted using approved methods per WAC 173-400-050, -060, & -105(4). Chapter 173-

400 WAC does not elaborate on what "approved" means. Language has been added to this condition to clarify what SCAPCA considers "approved". The condition requires that in order for a method to be approved it must be submitted to SCAPCA at least 30 days prior to the test date, or a shorter period of time if indicated in writing by SCAPCA, and SCAPCA must approve the method in writing. Changes must also be approved by SCAPCA in writing. [WAC 173-400-105(4), 8/20/93] [WAC 173-400-105(4), 1/10/05 - STATE/LOCAL ONLY] [WAC 173-401-615(1), 9/16/02]

52. Source Testing for Chapter 173-434 WAC¹. To demonstrate compliance with Chapter 173-434 WAC, the methods and procedures in WAC 173-400-105 shall be used. [WAC 173-434-130(6), 12/22/03] [PSD-88-1B, Condition 28, 9/1/89 as modified on 2/9/96]

53. Special Studies¹. Ecology or SCAPCA may require such additional special studies relevant to process emissions and establish completion dates as it determines necessary. These special studies may include the requirement to conduct studies of dioxin emissions and control measures. [WAC 173-434-210, 9/17/90] [PSD-88-1B, Condition 28, 9/1/89 as modified on 2/9/96]

54. Health Risk & Literature Search¹. SCAPCA may require the permittee to reevaluate the health risk, if there is a significant change in conditions as projected in the health risk assessment or new health data becomes available. SCAPCA may periodically request that the permittee conduct a literature search as such new data becomes available. [NOC #170, Condition G.5, 3/3/88 as modified on 8/31/89, 11/19/97, 4/23/98, & 8/8/06]

55. Health Effects Studies.¹ If the emission rate of any element or compound listed in Condition B.1 of NOC #170 is greater than specified in the application documents listed in Part I of NOC #170, the SCAPCA Director may require that the permittee conduct health effects studies based upon the most current emission data available. [NOC #170, Condition B.1, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06]

56. Providing Additional Emissions Data.¹ The permittee must furnish, upon request by Ecology or SCAPCA, data required to evaluate the incinerators' emissions or emissions control program. [WAC 173-434-170(4), 12/22/03] [PSD-88-1B, Condition 28, 9/1/89 as revised on 2/9/96]

EMISSION LIMITATIONS & MONITORING, RECORDKEEPING & REPORTING

This section contains emission limitations and emission related requirements, including general requirements for the facility. The section is divided into several subsections. The first subsection lists limitations that apply facility-wide. Subsequent subsections focus on individual emission units or classes of similar emission units. As in all other sections of the permit, requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation and are not enforceable by EPA or citizens.

This section of the permit is formatted differently from the STANDARD TERMS AND CONDITIONS section. Requirements are presented in tables. The actual requirement is given in the third column of the emission limitation tables. The regulatory basis for the applicable requirement is listed in the second column of the tables. The averaging time and reference test method, used to determine compliance with the requirements, are listed in the fourth and fifth columns, if applicable. The monitoring, recordkeeping, and reporting requirements (MRRR) used to determine compliance with the requirement are listed in the last column of the emission limitation tables.

The MRRR are enforceable and are given in the last subsection of the permit. It should be noted that while

a violation of a MRRR is a violation of the permit, it is not necessarily a violation of the underlying emission limitation.

For SRSWS, this section contains six subsections:

FACILITY-WIDE EMISSION LIMITATIONS; and
MUNICIPAL WASTE COMBUSTORS EMISSION LIMITATIONS;
MISCELLANEOUS UNITS EMISSION LIMITATIONS
FUGITIVE EMISSION LIMITATIONS
DESIGN PARAMETER REQUIREMENTS; and
MONITORING, RECORDKEEPING, & REPORTING REQUIREMENTS.

If an applicable requirement does not include sufficient monitoring, recordkeeping, and reporting to satisfy WAC 173-401-615(1) & (2), the permit will establish adequate monitoring, recordkeeping and reporting. This is known as gapfilling. Applicable requirements for which gapfilling is proposed can be identified by the note, following the MRRR citation, indicating that at least a portion of the MRRR is from gapfilling.

If the permit condition is a streamlined condition, as found in the third section of the permit, III. STREAMLINED REQUIREMENTS, a reference to the streamlined condition is made (e.g., Condition 1S, 2S, etc...). In this document, the streamlined conditions will be discussed in the next section. The discussion will include information on how the streamlined condition is at least as stringent as all of the underlying requirements, in accordance with EPA's guidance on streamlining².

Facility-wide Emission Limitations

This subsection contains applicable emission limitations which apply facility-wide. These emission limitations are applicable to all significant and insignificant emission units at the facility. However, monitoring, recordkeeping, and reporting requirements are not required for the insignificant emission units because SCAPCA has determined that they are not necessary to assure compliance with facility-wide emission limitations. SRSWS is required to certify compliance with the facility-side emission limitations for insignificant emission units.

The following requirements are included in this section.

Condition 57: The permittee shall meet the operation and maintenance requirements given in Condition 1S of this permit. [Condition 1S of this permit, see Section III. STREAMLINED REQUIREMENTS]

MRRR: SRSWS is required to keep records showing the names of persons who have completed a review of the operating manuals as required in Condition 1S of this permit including the date of the initial review and subsequent annual reviews. [NOC #170, Conditions D.12, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06]

Condition 58: All emission units are required to use reasonably available control technology, in accordance with WAC 173-400-040 – STATE/LOCAL ONLY [WAC 173-400-040, 8/20/93] [WAC 173-400-040, 8/15/01 – STATE/LOCAL ONLY]

² USEPA Guidance, titled "White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program", from Lydia N. Wegman, Deputy Director of the Office of Air Quality Planning and Standards, dated March 5, 1996.

MRRR: No monitoring is required. As with all permit terms, SRSWS must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition 59: Visible emissions from any emission unit, except for the MWCs, shall not exceed 20% for an aggregate of more than three minutes, in any one hour, except as otherwise allowed in WAC 173-400-040(1), as determined using ECOLOGY Method 9A (July 12, 1990). In addition, except for the MWCs, visible emissions from any emission unit shall not be greater than 0% for more than six minutes in any one-hour period, as determined using RM 22. [Condition 3S of this permit, see Section III. STREAMLINED REQUIREMENTS]

MRRR: Except for the municipal waste combustor units covered under Section II.B, and the ash handling system scrubber covered under Section II.C, all emission units to which this requirement applies are insignificant emission units. SCAPCA has determined that no MRRR is required for the insignificant emission units. The MRRR included with this condition applies only to the ash handling system scrubber. See Condition 79 in Section II.B for the streamlined opacity requirements that apply to the MWCs.

Particulate emissions from the ash handling system should be low because NOC #170 requires that the ash be wetted sufficiently to prevent fugitive emissions during handling. In addition, the facility has never had a problem meeting the opacity limit in the past. Therefore, if the ash handling system scrubber is kept in proper working order, the facility should be able to meet the opacity limit.

To ensure that the scrubber is kept in proper working order, SRSWS is required to develop and implement an operation and maintenance plan within 30 days of start-up of the scrubber system. The plan shall include a schedule for maintaining the blower bearings, drive, and motor; periodic checks of the irrigation system and piping; daily checks of the pressure drop across the scrubber section to ensure that they are within the normal operating range of 6-10" w.c.; and periodic checks of the mist eliminator to make sure there is no pluggage. The periodic checks shall be done at least as frequently as recommended by the manufacturer. Maintenance records shall be kept for the previous 5 years of operation. [NOC #934, Condition 5, 10/27/00 – STATE/LOCAL ONLY]

Condition 60: Visible Emissions shall not equal or exceed 20%, as specified in SCAPCA Regulation I, 6.02 - STATE/LOCAL ONLY [SCAPCA Regulation I, 6.02, 3/4/04- STATE/LOCAL ONLY]

MRRR: Except for the municipal waste combustor units covered under Section II.B, and the ash handling system scrubber covered under Section II.C, all emission units to which this requirement applies are insignificant emission units. SCAPCA has determined that no MRRR is required for the insignificant emission units. The MRRR included with this condition applies only to the ash handling system scrubber. See Condition 79 in Section II.B for the streamlined opacity requirements that apply to the MWCs.

Particulate emissions from the ash handling system should be low because NOC #170 requires that the ash be wetted sufficiently to prevent fugitive emissions during handling. In addition, the facility has never had a problem meeting the opacity limit in the past. Therefore, if the ash handling system scrubber is kept in proper working order, the facility should be able to meet the opacity limit.

To ensure that the scrubber is kept in proper working order, SRSWS is required to develop and implement an operation and maintenance plan within 30 days of start-up of the scrubber system. The plan shall include a schedule for maintaining the blower bearings, drive, and motor; periodic checks of the irrigation system and piping; daily checks of the pressure drop across the scrubber section to ensure that they are within the normal operating range of 6-10" w.c.; and periodic checks of the mist eliminator to make sure there is no pluggage. The periodic checks shall be done at least as frequently as recommended by the manufacturer. Maintenance records shall be kept for the previous 5 years of operation. [NOC #934, Condition 5, 10/27/00 – STATE/LOCAL ONLY]

Condition 61: There shall be no visible emissions from any location other than the baghouse stacks, ash conditioner baghouse stack or lime storage bin at any time. [NOC #170, Condition C.8, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06]

MRRR: All emission units to which this requirement applies are insignificant emission units. SCAPCA has determined that no MRRR is required for insignificant emission units.

Condition 62: No person shall cause or permit the emission of particulate matter from any source to be deposited beyond the property under direct control of the owner or operator of the source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited or to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited. [WAC 173-400-040(2), 1/10/05 - STATE/LOCAL ONLY] [SCAPCA Regulation I, 6.05.A, 3/4/04(11/12/93)]

MRRR: The permittee is required to investigate any complaints that it may receive regarding particulate matter fallout. If problems are found corrective action must be taken. Records of each complaint received, along with the results of the subsequent investigation, must be kept. [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

Condition 63: Reasonable precautions must be taken to:

- a. Prevent PM from becoming airborne when constructing, altering, repairing, or demolishing buildings, appurtenances, and roads;
- b. Prevent tracking of PM onto paved roadways open to the public;
- c. Prevent the release of air contaminants, as specific in WAC 173-400-040(3)(a), if located in an attainment area and not impacting a NAA;
- d. Prevent PM from becoming airborne when handling, transporting, and /or storing PM; and
- e. Prevent fugitive dust from becoming airborne and source must be maintained and operated to minimize emissions.

Examples of reasonable precautions are provided in Condition 1M.

[SCAPCA Regulation I, 6.05.C, 3/4/04(11/12/93)] [SCAPCA Regulation I, 6.05.D, 3/4/04(11/12/93)] [WAC 173-400-040(3)(a), 1/10/05(11/12/93)] [SCAPCA Regulation I, 6.05.B, 3/4/04(11/12/93)] [WAC 173-400-040(8)(a), 1/10/05(8/20/93)]

MRRR: The permittee is required to investigate any complaints that it may receive regarding

particulate matter emissions. If problems are found corrective action must be taken. Records of each complaint received, along with the results of the subsequent investigation, must be kept. [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

While not a part of the required MRRR for this requirement, the operation and maintenance plan (see Condition 57 above) will also add assurance that this requirement will be met, as it addresses several potential sources of particulate matter fallout and fugitive emissions and it requires a section on how the facility will keep roadways free of visible dust.

Condition 64: Recognized good practices and procedures must be used to reduce odors to a reasonable minimum, in accordance with WAC 173-400-040(4) – STATE / LOCAL ONLY [WAC 173-400-040(4), 1/10/05 – STATE / LOCAL ONLY]

MRRR: The permittee is required to investigate any complaints that it may receive regarding odors. If problems are found corrective action must be taken. Records of each complaint received, along with the results of the subsequent investigation, must be kept. [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

While not a part of the required MRRR for this requirement, the operation and maintenance plan (see Condition 57 above) will also add assurance that this requirement will be met, as it addresses several potential sources of odors. In addition, the facility must meet operational requirements that will minimize the possibility of odors, including drawing combustion air for the MWC from the tipping floor (Condition 123), keeping doors closed when possible (Condition 117), and not storing solid waste outside (Condition 66).

Condition 65: Effective control apparatus and measures must be used to reduce odor-bearing gases and particulate matter to a reasonable minimum. – STATE / LOCAL ONLY [SCAPCA Regulation I, 6.04, 3/4/04- STATE/LOCAL ONLY]

MRRR: The monitoring is the same as for Condition 64 which also pertains to odors. [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

Condition 66: Solid waste shall not be stored outside. [NOC #170, Condition C.12, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06]

MRRR: No monitoring is required. As with all permit terms, SRSWS must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition 67: No person shall cause or permit the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business- STATE/LOCAL ONLY [WAC 173-400-040(5), 1/10/05(8/20/93)] [SCAPCA Regulation I, 6.06.A, 3/4/04- STATE/LOCAL ONLY]

MRRR: Because of the numerous emission limits placed on this facility, no ongoing monitoring is required. As with all permit terms, SRSWS must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition 68: No person shall cause or permit the installation or use of any means which conceals or masks an emission of an air contaminant which would otherwise violate any provisions of Chapter 173-400 WAC - STATE/LOCAL ONLY [WAC 173-400-040(7), 8/15/01(8/20/93)] [SCAPCA Regulation I, 6.07.A, 3/4/04- STATE/LOCAL ONLY]

MRRR: No monitoring is required. As with all permit terms, SRSWS must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition 69: The permittee shall not build, erect, install, or use any article, machine, equipment, or process which conceals an emission which would otherwise violate an applicable standard under 40 CFR Part 60. [40 CFR § 60.12, 2006] [PSD-88-1B, Condition 28, 9/1/89 as revised on 2/9/96] [WAC 173-400-115, 1/10/05]

MRRR: No monitoring is required. As with all permit terms, SRSWS must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition 70: Particulate matter emissions from combustion and incineration units shall not exceed 0.1 gr/dscf, corrected to 7% oxygen, as specified in WAC 173-400-050(1) & WAC 173-400-050(3). NOTE: The exception in WAC 173-400-050(3) is STATE/LOCAL ONLY. This exception allows for an alternate correction to measured concentrations (other than 7% oxygen) if determined by SCAPCA to be representative of normal operations. [WAC 173-400-050(1) & WAC 173-400-050(3), 8/15/01 (2/19/91)]

MRRR: Except for the emission units covered under Section II.B of the permit, all emission units to which this requirement applies are insignificant emission units. SCAPCA had determined that no MRRR is required for insignificant emission units. Section II.B contains MRRR for the significant emission units to which this requirement applies. (See Condition 78.)

Condition 71: Particulate matter emissions from general process units shall not exceed 0.1 gr/dscf, as specified in WAC 173-400-060 [WAC 173-400-060, 2/19/91] [WAC 173-400-060, 1/10/05 – STATE/LOCAL ONLY]

MRRR: Except for the ash handling system scrubber covered under Section II.C, all emission units to which this requirement applies are insignificant emission units. SCAPCA has determined that no MRRR is required for the insignificant emission units. The MRRR included with this condition applies only to the ash handling system scrubber.

Particulate emissions from the ash handling system should be low because NOC #170 requires that the ash be wetted sufficiently to prevent fugitive emissions during handling. Therefore, if the ash handling system scrubber is kept in proper working order, the facility should be able to meet the grain loading limit.

The monitoring for the ash handling system scrubber is the same as for Condition 59 (visible emission standard that applies to the ash handling system scrubber) which requires the permittee to develop and implement and operation and maintenance plan for the scrubber. [NOC #934, Condition 5, 10/27/00 – STATE/LOCAL ONLY]

Condition 72: SO₂ emissions from each unit shall not exceed 1000 ppm on a dry basis, corrected to 7% oxygen, as specified in WAC 173-400-040(6). NOTE: The second paragraph of WAC 173-400-040(6) is STATE/LOCAL ONLY [WAC 173-400-040(6), 1/10/05(8/20/93)]

MRRR: Except for the municipal combustor units covered under Section II.B of the permit, all emission units to which this requirement applies are insignificant emission units. SCAPCA has determined that MRRR is not required for insignificant emission units. Section II.B contains MRRR for the significant emission units to which this requirement applies. (See Condition 80.)

Condition 73: Handling and use of ozone-depleting substances must be in accord with 40 CFR Part 82. [40 CFR Part 82, 2006]

MRRR: No monitoring is required. As with all permit terms, SRSWS must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition 74: Fines content of traction sanding materials shall not equal or exceed 3% fines and 25% durability index. [SCAPCA Regulation I, 6.14.D.1, 10/7/04(1/7/99)]

MRRR: The MRRR for this condition are outlined in the SCAPCA Regulation I, Section 6.14. The permittee must maintain on file reports received under SCAPCA Regulation I, 6.14.F.1 for a period of five years. No later than June 30 of each year, the permittee is required to submit a report to SCAPCA containing the total amount of sanding material (both new and recycled) and salt and other deicing chemicals used at the facility during the preceding season (a season begins November 1 and continues to April 30 of the following year). [SCAPCA Regulation I, 6.14.F.2.d & 6.14.F.2.b, 10/7/04(1/7/99)]

In addition, if the permittee uses recycled materials,

a. The permittee, or its contractors, shall have at least one test performed by an approved laboratory, as defined in SCAPCA Regulation I, 6.14.B.2, to determine the percent fines and durability index on all recycled materials at least once for the first 250 tons of recycled materials used each season and at least once for every 500 tons of recycled materials used thereafter during the same season; and [SCAPCA Regulation I, 6.14.E.2, 10/7/04(1/7/99)]

b. The permittee shall submit to SCAPCA copies of the results of testing conducted according to a. above, no later than 30 days after the tests are conducted. [SCAPCA Regulation I, 6.14.F.2.a, 10/7/04(1/7/99)]

Condition 75: No contract for traction sanding materials shall be executed unless it includes the standards set forth in Condition 74. [SCAPCA Regulation I, 6.14.D.2, 10/7/04(1/7/99)]

MRRR: The MRRR for this condition are outlined in the SCAPCA Regulation I, Section 6.14. Within 7 days of awarding a contract for the purchase of sanding materials to a supplier, the permittee must notify SCAPCA of the supplier's name and location of the aggregate source from which the materials will be supplied. [SCAPCA Regulation I, 6.14.F.2.c., 10/7/04(1/7/99)]

Condition 76: No outdoor burning, except as allowed under Chapter 173-425 WAC and/or SCAPCA

Regulation I, 6.01 [Chapter 173-425 WAC, 3/13/00(10/18/90)] [SCAPCA Regulation I, 6.01, 3/4/04 - STATE/LOCAL ONLY]

MRRR: No monitoring is required. As with all permit terms, SRSWS must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition 77: The permittee shall comply with the requirements of 40 CFR Part 68, Chemical Accident Prevention Provisions. [40 CFR Part 68, 2006]

MRRR: No monitoring is required. As with all permit terms, SRSWS must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

There are several air quality requirements (e.g., in the NOC, PSD, 40 CFR Part 60, etc...) that are either one-time facility-wide requirements that have been fulfilled, that were included for informational purposes only, or for some other reason no longer apply. These conditions are listed below and are not included in SRSWS's operating permit.

Citation	Description	Reason not included in the permit
PSD-88-1B, Condition 29, 9/1/89 as revised on 2/9/96 NOC #170, Condition E.6, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06	These conditions require the permittee to conduct an ambient monitoring program.	This is a one-time condition that has been met.
PSD-88-1B, Condition 30, 9/1/89 as revised on 2/9/96	This condition voids the PSD approval if construction is not begun within a certain timeframe.	Construction was begun within the allowed timeframe. This requirement no longer applies.
PSD-88-1B, Condition 32, 9/1/89 as revised on 2/9/96	Notification of startup	This is a one-time condition that has been met.
NOC #170, Condition D.10, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06	This requirement applies to a cooling water tower(s) that was never installed.	The requirement does not apply since it is for equipment that was not installed.
NOC #170, Condition D.11, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06	This requirement applies to a cooling water tower(s) that was never installed.	The requirement does not apply since it is for equipment that was not installed.
NOC #170, Condition G.3, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06	This condition states that SCAPCA reserves the authority to modify, reissue, or rescind the permit for cause.	This requirement is for informational purposes only.
NOC #170, Condition G.4, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06	This condition states that it is the responsibility of the permittee to make all design changes made after 12/18/1987.	This requirement applied during the construction phase of the facility and no longer is applicable. (Future design changes may require SCAPCA notification and a NOC in accordance with Conditions 46 & 47 of the permit.
NOC #170, Condition G.6, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06	This condition states that the conditions of the NOC are severable.	This condition is for informational purposes only.
NOC #170, Condition G.8, 3/3/88 as revised on 8/31/89,	This condition states that the most stringent of all applicable	This condition is for informational purposes only.

Citation	Description	Reason not included in the permit
11/19/97, 4/23/98, & 8/8/06	requirements will apply.	
NOC #170, Condition G.10, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06	This condition prohibits open burning during the construction of the facility.	This requirement applied during construction of the facility. Since construction is complete, this requirement no longer applies.

Municipal Waste Combustors Emission Limitations

This subsection of the permit contains applicable emission limitations applying to the two municipal waste combustors (MWCs). The following requirements are included in this subsection.

Condition 78: Particulate emissions from each MWC shall not exceed:

- 34 tons per year total particulate matter, including front and back halves, but excluding sulfates, chlorides, and ammonium salts;
- 27 mg/dscm, corrected to 7% oxygen for total particulate matter, including the front half only; and
- 0.020 gr/dscf, corrected to 7% oxygen for total PM, including front and back halves, but excluding sulfates, chlorides, and ammonium salts.

[Condition 4S of this permit, see Section III. STREAMLINED REQUIREMENTS]

MRRR:

Both of the MWC emission units at the WTE facility have emission limits that are subject to 40 CFR Part 64 – Compliance Assurance Monitoring (CAM). Per 64.2, the requirements of 40 CFR Part 64 apply to a pollutant-specific emissions units (PSEU) at a major source that is required to obtain a Part 70 permit if the unit satisfies all of the following criteria:

1. The PSEU must have pre-controlled emissions of the applicable pollutant which exceeds the major source thresholds established in WAC 173-401-200(17). In the case of the MWC emission units, SRSWS has estimated the pre-controlled PTE of particulate matter to be 2,239 tpy per MWC. This exceeds the major source threshold of 100 tpy, established in WAC 173-401-200(17).
2. The PSEU must utilize air pollution control equipment to reduce emissions of the applicable pollutant to a level that meets the established emission limit(s). In the case of the MWCs, the particulate emissions of the PSEU are controlled by a pulse-jet baghouse. It is not possible for the MWC to by-pass the baghouse. Therefore, CAM does not need to address the potential for bypass.
3. The PSEU must be subject to an emission limit for the applicable pollutant. In the case of the MWCs, the PSEU is subject to the following particulate emission limits:
 - 0.020 gr/dscf, corrected to 7% O₂ for PM and 0.015 gr/dscf, corrected to 7% O₂ for PM₁₀, given in PSD 88-1B, Conditions 1 & 2;
 - 0.020 gr/dscf, corrected to 7% O₂ for PM and 0.015 gr/dscf, corrected to 7% O₂ for PM₁₀, given in NOC #170, Condition A.1;
 - 0.10 lb particulate / MMBtu, given in 40 CFR 60.43b(d)(1);
 - 0.18 gr/dscm (0.08 gr/dscf) particulate, corrected to 12% CO₂, given in 40 CFR 60.52(a);
 - 0.020 gr/dscf particulate, corrected to 7% O₂, given in WAC 173-434-130(1)(a);

- gr/dscf, corrected to 7% O₂, given in WAC 173-400-050(1) & (3);
- 27 mg/dscm, corrected to 7% O₂, given in SCAPCA Regulation I, Section 6.17.D.1 (which incorporates the requirements from 40 CFR 60, Subpart Cb)

The particulate limits listed above have been streamlined to the limits given in Condition 78 and listed below to simplify the permit (see Condition 4S of Section III. STREAMLINED REQUIREMENTS for discussion of streamlining of particulate emission standards):

Streamlined Particulate Emission Limit for MWCs:

- 34 tons per year total particulate matter, including front and back halves, but excluding sulfates, chlorides, and ammonium salts;
- 27 mg/dscm, corrected to 7% oxygen for total particulate matter, including the front half only*; and
- 0.020 gr/dscf, corrected to 7% oxygen for total PM, including front and back halves, but excluding sulfates, chlorides, and ammonium salts.

* The 27 mg/dscm, corrected to 7% O₂ oxygen for total particulate matter, emission limit is considered exempt from CAM, per 64.2(b)(1)(i), because 40 CFR 60, Subpart Cb (as implemented in SCAPCA Regulation I, Section 6.17) was proposed after November 15, 1990 pursuant to Section 111 and 112 of the Clean Air Act. Therefore, Subpart Cb emission limits have sufficient monitoring and are not subject to CAM.

For emission units subject to CAM, if the post-controlled particulate PTE is estimated to be more than 100 tons per year, the unit is considered a large emissions unit. For large emissions units, data collection frequency must be at least 4 times per hour. The post-controlled PTE of particulate matter from each MWC is 34 tons per year, based on the annual PM limit contained in the PSD permit for SRSWS. Therefore, each MWC is not considered to be a large emissions unit, since post-controlled particulate PTE are less than 100 tons per year. Per 40 CFR 64.3(b)(iii), the frequency of data collection may be less frequent than 4 times per hour, but must include some data collection at least once per 24-hour period.

SRSWS has proposed to use the monitoring contained in 40 CFR 60, Subpart Cb (as implemented in SCAPCA Regulation I, Section 6.17) to meet the CAM requirements for the streamlined particulate standards that apply to the MWCs.

In a letter dated July 7, 1999, EPA responded to an inquiry posed by a facility as to whether using the monitoring contained in 40 CFR 60, Subparts Eb and Cb could be used to satisfy title V periodic monitoring (40 CFR Part 70) or compliance assurance monitoring (40 CFR Part 64) requirements for other applicable requirements under existing air pollution regulations, such as State implementation plans (SIPs). Per the July 7, 1999 letter from Steven Hitte of EPA to Ms. Maria Zannes of Integrated Waste Services Association, “the monitoring requirements in subpart Eb are rigorous and specify use of continuous monitoring systems for opacity, for emissions of acid gases, organic gases, and nitrogen oxides, and for operational parameters that serve as surrogates for monitoring compliance with particulate matter, dioxins and furans, and metals emissions limits.” The monitoring requirements given in 40 CFR 60, Subpart Eb, referenced in EPA’s letter, are virtually identical to the monitoring requirements given in 40 CFR 60, Subpart Cb, which is applicable to the WTE facility. Per EPA’s letter, “we expect that in most cases monitoring that complies with the requirements in

subpart Eb will also provide the assurance of compliance required by part 70 or part 64 for other emissions limitations or standards for the same or similar pollutants.” EPA’s letter states further, “whether the monitoring in subpart Eb alone is sufficient to satisfy part 70 or part 64 monitoring requirements for emissions limitations not addressed in subpart Eb must be evaluated on a case-by-case basis by the permitting authority in the title V permit application review and approval process. Where possible, as determined through the permitting authority on a case-by-case basis, we fully support simplifying monitoring requirements for permits, including through the application of one monitoring approach for multiple emissions limitations of the same pollutant or dissimilar pollutants.”

The Subpart Cb particulate emission limit, 27 mg/dscm corrected to 7% O₂, is presumed to have sufficient monitoring in Subpart Cb (because it is a post 1990 standard pursuant to Section 111 and 112 of the FCAA) and therefore is not subject to CAM. The monitoring related to the particulate matter emission limit in Subpart Cb consists of an annual performance testing using EPA Method 5. In addition, 40 CFR 60, Subpart Cb contains opacity monitoring requirements under 40 CFR 60.58b and 40 CFR 60.38b, which are used as an indicator of particulate control device performance to provide assurance that PM emissions are minimized and a surrogate for continuous particulate emission monitoring. SRSWS has proposed to use the Subpart Cb monitoring (i.e., annual particulate performance test and continuous opacity monitoring) to meet the CAM requirements for the other streamlined particulate emission limits (i.e., 34 ton per year total particulate matter emission limit and 0.020 gr/dscf, corrected to 7% O₂ for total PM, including front and back halves, but excluding sulfates, chlorides, and ammonium salts).

SRSWS has performed an annual particulate performance test on the baghouse outlet for the past 10+ years. The annual particulate performance tests have not shown any instances where the PSD particulate emission limits (i.e., 34 ton per year total particulate matter emission limit and 0.020 gr/dscf, corrected to 7% O₂ for total PM, including front and back halves, but excluding sulfates, chlorides, and ammonium salts), were exceeded. The highest particulate matter emissions measured during the annual performance test on the MWCs since 1991 is < 0.01 gr/dscf. Therefore, the Subpart Cb monitoring, consisting of an annual particulate test and continuous opacity monitoring, should be acceptable for the particulate emission standards subject to CAM. Per the EPA letter referenced above, in most cases monitoring that complies with the requirements in subpart Eb will also provide the assurance of compliance required by part 64 for other emissions limitations or standards for the same pollutants. Therefore, since there is no reason to believe that the monitoring established for particulate under Subpart Cb would not be sufficient for the other particulate emission standards, given in the PSD permit, the Subpart Cb monitoring will be applied as CAM for all of the applicable MWC particulate emission limits.

The monitoring contained in 40 CFR 60, Subpart Cb (as implemented in SCAPCA Regulation I, Section 6.17), which will be used as CAM for all of the applicable MWC particulate emissions limits, requires that the permittee test particulate matter emissions from each MWC annually. The permittee must maintain records, for a period of 5 years, of each test done. Twice a year the permittee must report to SCAPCA, the results of the two most recent performance tests, including any results documenting a violation of the particulate emission limit given in Cb.

In addition, since opacity is a surrogate and indicator of particulate and PM₁₀ emissions, the opacity monitoring required under 40 CFR 60.58b and 40 CFR 60.38b will be used as an

indicator of baghouse performance. Under the required opacity monitoring, the permittee is required to continuously monitor opacity from each baghouse outlet, maintain records for the monitored opacity data, including all 6-minute average opacity levels, and submit a monthly summary of the monitoring data. Since the required opacity monitoring is required to generate 6-minute average opacity levels, this meets the CAM requirement given in 40 CFR 64.3(b)(iii), to have some data collection at least once per 24-hour period.

[WAC 173-434-170, 12/22/03] [PSD-88-1B, Condition 12, 27, & 28, 9/1/89 as revised on 2/9/96] [NOC #170, Conditions B.1, B.2, B.3, B.4, E.1, E.2, F.1, F.2, F.3, F.4, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06] [SCAPCA Regulation I, Sections 6.17.H & I, 1/13/99] [WAC 173-400-115(1), 1/10/05] [40 CFR § 60.7(b) & (f), 1996] [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

While not a part of CAM for the particulate emission limits, the operation and maintenance plan (see Condition 57 above) will also add assurance that the particulate emission limits will be met, as it addresses proper operation and maintenance of the control equipment. In addition, the facility must meet operational requirements that will add assurance that this requirement is met, including:

- keeping spare bags on site to minimize replacement time if a faulty bag is found in the baghouse (see Condition 99 of the permit);
- maintaining the MWC baghouse inlet temperatures below a specified limit, thereby minimizing the amount of condensable PM that will pass through the baghouses (see Condition 101 of the permit); and
- monitoring the MWC baghouse pressure drop to minimize the likelihood that a problem with the baghouse could go unnoticed (see Condition 6M.i of the permit).

Condition 79: Opacity from each MWC shall:

- a. Be less than or equal to 10%, six-minute average, as measured using a continuous opacity monitor, meeting the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1, and operated according to 40 CFR § 60.11;
- b. Be less than or equal to 5%, based on either a six-minute average or a six-minute aggregate, whichever is more stringent, as determined using RM 9 for the six-minute average, and Ecology Method 9B for the six-minute aggregate; and
- c. Be less than 20%, based on a three-minute aggregate, as determined using Ecology Method 9A.

[Condition 5S of this permit, see Section III. STREAMLINED REQUIREMENTS]

MRRR: The permittee is required to perform an annual opacity test using EPA Method 9. The permittee must maintain records, for a period of 5 years, of each test done. Twice a year the permittee must report to SCAPCA, the results of the two most recent performance tests, including any results documenting a violation of the emission limit.

In addition, the permittee must continuously monitor opacity from the baghouse outlets, maintain records for the monitored opacity data, including all 6-minute average opacity levels, and submit a monthly summary of the monitoring data.

[WAC 173-434-170, 12/22/03] [PSD-88-1B, Condition 12, 27, & 28, 9/1/89 as revised on

2/9/96] [NOC #170, Conditions B.1, B.2, B.3, B.4, E.1, E.2, F.1, F.2, F.3, F.4, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06] [SCAPCA Regulation I, Sections 6.17.H & I, 1/13/99] [WAC 173-400-115(1), 1/10/05] [40 CFR § 60.7(b) & (f), 1996] [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

While not a part of required monitoring for the streamlined opacity limits, the operation and maintenance plan (see Condition 57 above) will also add assurance that the particulate emission limits will be met, as it addresses proper operation and maintenance of the control equipment. In addition, the facility must meet operational requirements that will add assurance that this requirement is met, including:

- keeping spare bags on site to minimize replacement time if a faulty bag is found in the baghouse (see Condition 99 of the permit);
- maintaining the MWC baghouse inlet temperatures below a specified limit, thereby minimizing the amount of condensable PM that will pass through the baghouses (see Condition 101 of the permit); and
- monitoring the MWC baghouse pressure drop to minimize the likelihood that a problem with the baghouse could go unnoticed (see Condition 6M.i of the permit).

Condition 80: Except during periods of startup or shutdown, based on a 24-hour geometric mean determined using RM 19, Section 4.3 and 5.4:

- During 95% of the operating time per month, controlled sulfur dioxide emissions from each MWC shall not exceed 25 ppm, corrected to 7% oxygen, or uncontrolled sulfur dioxide emissions from each MWC shall be reduced by at least 85% by weight, whichever is less stringent; and
- At all times, controlled sulfur dioxide emissions from each MWC shall not exceed 29 ppm, corrected to 7% oxygen, or uncontrolled sulfur dioxide emissions from each MWC shall be reduced by at least 80% by weight, whichever is less stringent.

Periods of startup and shutdown are limited to 3 hours per occurrence.

SO₂ emissions shall be measured, using a continuous emissions monitor system designed, installed, and operated to meet the requirements in 40 CFR Part 60, Appendix B (Performance Specification 2) and Appendix F and in SCAPCA Regulation I, Section 6.17.H. The 24-hour daily geometric means shall be determined, using RM 19, Section 4.3 and 5.4.

[Condition 6S of this permit, see Section III. STREAMLINED REQUIREMENTS]

MRRR: The permittee is required to continuously monitor SO₂ emissions at the inlet to the spray dry absorber and at the baghouse outlets. The monitors must meet EPA performance specifications and go through audits to verify acceptable accuracy. Records of the monitoring data must be kept and a summary of the data must be reported to SCAPCA monthly and semi-annually, including identification of periods of deviations from the standard.

[WAC 173-434-170, 12/22/03] [PSD-88-1B, Condition 12, 27 & 28, 9/1/89 as revised on 2/9/96] [NOC #170, Condition E.1, E.2, F.1, F.2, F.3, & F.4, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06] [SCAPCA Regulation I, Section 6.17.H & 6.17.I, 1/13/99] [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

It should be noted that the SO₂ emission limits are not subject to 40 CFR Part 64 –

Compliance Assurance Monitoring (CAM). Although the three CAM applicability criteria apply (i.e., 1) the pollutant specific emissions unit (PSEU) has pre-controlled SO₂ emissions over 100 tons (each MWC has an uncontrolled PTE of 309 tons SO₂ per year), 2) the PSEU utilizes air pollution control equipment (a spray dry absorber) to reduce SO₂ emissions, and 2) the PSEU is subject to several SO₂ emission limits), per 64.2(b), “the requirements of this part shall not apply to any of the following emission limitations are standards: (vi), emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method, as defined in 64.1.” Since the continuous SO₂ emission monitor (CEM) is required in this part 70 permit and qualifies as a continuous compliance determination method, the requirements of CAM are not applicable to the MWC SO₂ emission limits.

Condition 81: Hydrogen chloride (HCl) emissions from each MWC shall not exceed 29 ppm, corrected to 7% oxygen, or uncontrolled emissions shall be reduced by at least 95% by weight, whichever is less stringent, as measured by RM 26 or 26A.

[Condition 7S of this permit, see Section III. STREAMLINED REQUIREMENTS]

MRRR: Both of the MWC emission units at the WTE facility have emission limits that are subject to 40 CFR Part 64 – Compliance Assurance Monitoring (CAM). Per 64.2, the requirements of 40 CFR Part 64 apply to a pollutant-specific emissions units (PSEU) at a major source that is required to obtain a Part 70 permit if the unit satisfies all of the following criteria:

1. The PSEU must have pre-controlled emissions of the applicable pollutant which exceeds the major source thresholds established in WAC 173-401-200(17). In the case of the MWC emission units, SRSWS has estimated the pre-controlled PTE of HCl to be 571 tpy per MWC. This exceeds the major source threshold of 10 tpy, established in WAC 173-401-200(17).
2. The PSEU must utilize air pollution control equipment to reduce emissions of the applicable pollutant to a level that meets the established emission limit(s). In the case of the MWCs, the HCl emissions of the PSEU are controlled by a spray dry absorber. It is not possible for the MWC to by-pass the spray dry absorber. Therefore, CAM does not need to address the potential for bypass.
3. The PSEU must be subject to an emission limit for the applicable pollutant. In the case of the MWCs, the PSEU is subject to the following HCl emission limits:
 - 50 ppm HCl, corrected to 7% O₂ or 80% reduction of uncontrolled HCl emissions, given in Condition 4 of PSD-88-1B;
 - 50 ppm HCl, corrected to 7% O₂, or 90% reduction of uncontrolled HCl emissions, given in Condition A.1 of NOC #170;
 - 50 ppm HCl, corrected to 7% O₂, or 80% reduction of uncontrolled HCl emissions, given in WAC 173-434-130(2);
 - 29 ppm HCl, corrected to 7% O₂, or 95% reduction of uncontrolled HCl emissions, whichever is less stringent, given in SCAPCA Regulation I, Section 6.17.D.1 (which incorporates the requirements from 40 CFR 60, Subpart Cb)

The HCl limits listed above have been streamlined to the limits given in Condition 81 and listed below to simplify the permit (see Condition 7S of Section III. STREAMLINED

REQUIREMENTS for discussion of streamlining of HCl emission standards):

Streamlined HCl Emission Limit for MWCs:

- Hydrogen chloride (HCl) emissions from each MWC shall not exceed 29 ppm, corrected to 7% oxygen, or 95% reduction, whichever is less stringent, as measured by RM 26 or 26A.

For emission units subject to CAM, if the post-controlled PTE for HCl is estimated to be more than 10 tons per year, the unit is considered a large emissions unit. For large emissions units, data collection frequency must be at least 4 times per hour. The post-controlled HCl PTE from each MWC is 28.6 tons per year, based on the 95% reduction requirement given in the streamlined emission limit. Therefore, each MWC is considered to be a large emissions unit, since post-controlled emissions are more than 10 tons per year, and data collection frequency must be at least 4 times per hour.

SRSWS has proposed to use the monitoring contained in 40 CFR 60, Subpart Cb (as implemented in SCAPCA Regulation I, Section 6.17) to meet the CAM requirements for the streamlined HCl standards that apply to the MWCs.

In a letter dated July 7, 1999, EPA responded to an inquiry posed by a facility as to whether using the monitoring contained in 40 CFR 60, Subparts Eb and Cb could be used to satisfy title V periodic monitoring (40 CFR Part 70) or compliance assurance monitoring (40 CFR Part 64) requirements for other applicable requirements under existing air pollution regulations, such as State implementation plans (SIPs). Per the July 7, 1999 letter from Steven Hitte of EPA to Ms. Maria Zannes of Integrated Waste Services Association, "the monitoring requirements in subpart Eb are rigorous and specify use of continuous monitoring systems for opacity, for emissions of acid gases, organic gases, and nitrogen oxides, and for operational parameters that serve as surrogates for monitoring compliance with particulate matter, dioxins and furans, and metals emissions limits." The monitoring requirements given in 40 CFR 60, Subpart Eb, referenced in EPA's letter, are virtually identical to the monitoring requirements given in 40 CFR 60, Subpart Cb, which is applicable to the WTE facility. Per EPA's letter, "we expect that in most cases monitoring that complies with the requirements in subpart Eb will also provide the assurance of compliance required by part 70 or part 64 for other emissions limitations or standards for the same or similar pollutants." EPA's letter states further, "whether the monitoring in subpart Eb alone is sufficient to satisfy part 70 or part 64 monitoring requirements for emissions limitations not addressed in subpart Eb must be evaluated on a case-by-case basis by the permitting authority in the title V permit application review and approval process. Where possible, as determined through the permitting authority on a case-by-case basis, we fully support simplifying monitoring requirements for permits, including through the application of one monitoring approach for multiple emissions limitations of the same pollutant or dissimilar pollutants."

The Subpart Cb HCl emission limit, 29 ppm corrected to 7% O₂ or 95% reduction, is presumed to have sufficient monitoring in Subpart Cb (because it is a post 1990 standard pursuant to Section 111 and 112 of the FCAA) and therefore is not subject to CAM. The monitoring related to the HCl emission limit in Subpart Cb consists of an annual performance testing using EPA Method 26 or 26A. In addition, 40 CFR 60, Subpart Cb contains continuous SO₂ monitoring requirements which are used as an indicator of acid gas removal device performance to provide assurance that HCl emissions are minimized and a surrogate for continuous HCl emission monitoring. EPA recognized in the 40 CFR Part 60, Subpart Eb and Cb standards that monitoring of SO₂ to verify acid gas removal device performance

ensures that HCl emissions are minimized. Because SO₂ is less reactive than HCl in the combustion gas stream, HCl removal primarily occurs first with SO₂ removal secondary to HCl removal. Therefore, if the SO₂ emissions are minimized, HCl emissions will be minimized as well.

SRSWS has proposed to use the Subpart Cb monitoring (i.e., annual HCl performance test and continuous SO₂ monitoring) for the HCl emission limits that are subject to CAM requirements (i.e., the PSD, NOC, and Chapter 173-434 HCl emission limits). Using the Subpart Cb monitoring should be adequate for the other HCl emission limits because the Subpart Cb HCl emission limit is the most stringent HCl limit that the MWC is required to meet. Per the EPA letter referenced above, in most cases monitoring that complies with the requirements in subpart Eb will also provide the assurance of compliance required by part 64 for other emissions limitations or standards for the same pollutants. Therefore, since there is no reason to believe that the monitoring established for HCl under Subpart Cb would not be sufficient for the other HCl emission standards, given in the PSD permit, the Subpart Cb monitoring will be applied as CAM for all of the applicable MWC HCl emission limits.

The SO₂ monitors are required to meet the requirements of 40 CFR § 60.13, which requires that all continuous monitoring systems for measuring emissions, except opacity, shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. As discussed above, each MWC is considered to be a large emissions unit under CAM since post-controlled emissions are more than 10 tons per year. Therefore, the data collection frequency must at least 4 times per hour. Since the SO₂ emission monitors are required to complete a minimum cycle of operation every 15 minutes, the CAM data collection frequency requirement will be met.

SRSWS has performed an annual HCl performance test on the baghouse outlet for the past 10+ years. The annual HCl performance tests have not shown any instances where any of the HCl emission limits were exceeded. The highest HCl emissions measured during the annual performance test on the MWCs since 1991 is 23.6 ppm at 7% O₂. For the past five years, the measured HCl has been < 5 ppm at 7% O₂.

The monitoring contained in 40 CFR 60, Subpart Cb (as implemented in SCAPCA Regulation I, Section 6.17), which will be used as CAM for all of the applicable MWC HCl emissions limits, requires that the permittee test HCl emissions from each MWC annually. The permittee must maintain records, for a period of 5 years, of each test done. Twice a year the permittee must report to SCAPCA, the results of the two most recent performance tests, including any results documenting a violation of the HCl emission limit given in Cb.

In addition, since SO₂ is an indicator of proper operation of the acid gas control device, the SO₂ monitoring required under Subpart Cb will be used as an indicator of HCl removal. Under the required SO₂ monitoring, the permittee is required to continuously monitor SO₂ emissions from the inlets to the spray dry absorber and baghouse outlets, maintain records for the monitored SO₂ data, including all 15-minute average SO₂ levels, and submit a monthly summary of the monitoring data.

Per the PSD permit, if EPA adopts a Performance Specification for hydrogen chloride monitors, the permittee will be required to install, maintain, and operate hydrogen chloride monitors on the MWC exhausts.

WAC 173-434-170, 12/22/03] [PSD-88-1B, Condition 4 & 28, 9/1/89 as revised on 2/9/96] [NOC #170, Conditions B.1, B.2, B.3, B.4 E.1, E.2 & F.3, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06] [SCAPCA Regulation I, Section 6.17.H & 6.17.I, 1/13/99] [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

While not a part of the CAM requirements for the HCl emission limits, the operation and maintenance plan (see Condition 57 above) will also add assurance that this requirement will be met, as it addresses proper operation and maintenance of the control equipment. In addition, the facility must meet operational requirements that will add assurance that this requirement is met, including:

- maintaining a minimum number of spare spray nozzles, thereby minimizing the amount of time it would take to replace a defective nozzle (see Condition 100 of the permit); and
- monitoring the lime slurry flow to the spray dry absorber to minimize the likelihood that a problem with the slurry flow could go unnoticed (see Condition 6M.I of the permit).

Condition 82: Except during periods of startup and shutdown, oxides of nitrogen (NO_x) emissions from each MWC shall not exceed:

- a. 165 ppm, corrected to 7% oxygen, 8-hour rolling average, as measured using a continuous emissions monitor system designed, installed, and operated to meet the requirements in 40 CFR Part 60, Appendix B (Performance Specification 2) and Appendix F and in SCAPCA Regulation I, Section 6.17.H;
- b. 225 ppm, corrected to 7% oxygen, 3-hour rolling average, as measured using a continuous emissions monitor system designed, installed, and operated to meet the requirements in 40 CFR Part 60, Appendix B (Performance Specification 2) and Appendix F and in SCAPCA Regulation I, Section 6.17.H; and
- c. 184 tons per year.

Periods of startup and shutdown are limited to 3 hours per occurrence.

[Condition 8S of this permit, see Section III. STREAMLINED REQUIREMENTS]

MRRR: The permittee is required to continuously monitor NO_x emissions. The monitors must meet EPA performance specifications and go through audits to verify acceptable accuracy. Records of the monitoring data must be kept and a summary of the data must be reported to SCAPCA monthly and semi-annually, including identification of periods of deviations from the standard.

[PSD-88-1B, Condition 12 & 27, 9/1/89 as revised on 2/9/96] [NOC #170, Condition E.1, E.2, F.1, F.2, F.3, & F.4, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06] [SCAPCA Regulation I, Section 6.17.H & 6.17.I, 1/13/99] [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

It should be noted that the NO_x emission limits are not subject to 40 CFR Part 64 – Compliance Assurance Monitoring (CAM). Although the three CAM applicability criteria apply (i.e., 1) the pollutant specific emissions unit (PSEU) has pre-controlled NO_x emissions over 100 tons (each MWC has an uncontrolled PTE of 460 tons NO_x per year), 2) the PSEU

utilizes air pollution control equipment (non selective catalytic reduction) to reduce NOx emissions, and 2) the PSEU is subject to several SO2 emission limits), per 64.2(b), “the requirements of this part shall not apply to any of the following emission limitations are standards: (vi), emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method, as defined in 64.1.” Since the continuous NOx emission monitor (CEM) is required in this part 70 permit and qualifies as a continuous compliance determination method, the requirements of CAM are not applicable to the MWC NOx emission limits.

Condition 83: Except during periods of startup and shutdown, carbon monoxide (CO) emissions from each MWC shall not exceed:

- a. 100 ppm, corrected to 7% oxygen, 8-hour rolling average, as measured using a continuous emissions monitor system designed, installed, and operated to meet the requirements in 40 CFR Part 60, Appendix B (Performance Specification 4) and Appendix F and in SCAPCA Regulation I, Section 6.17.H; and
- b. 100 ppm, corrected to 7% oxygen, 4-hour block average, as measured using a continuous emissions monitor system designed, installed and operated to meet the requirements in 40 CFR Part 60, Appendix B (Performance Specification 4) and Appendix F and in SCAPCA Regulation I, Section 6.17.H.

Periods of startup and shutdown are limited to 3 hours per occurrence.

[Condition 9S of this permit, see Section III. STREAMLINED REQUIREMENTS]

MRRR: The permittee is required to continuously monitor CO emissions. The monitors must meet EPA performance specifications and go through audits to verify acceptable accuracy. Records of the monitoring data must be kept and a summary of the data must be reported to SCAPCA monthly and semi-annually, including identification of periods of deviations from the standard.

[WAC 173-434-170, 12/22/03] [PSD-88-1B, Condition 12, 27, & 28, 9/1/89 as revised on 2/9/96] [NOC #170, Condition E.1, E.2, F.1, F.2, F.3, & F.4, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06] [SCAPCA Regulation I, Section 6.17.H & 6.17.I, 1/13/99] [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

It should be noted that the CO emission limits are not subject to 40 CFR Part 64 – Compliance Assurance Monitoring (CAM) because the uncontrolled CO PTE from each MWC is only 92 tons per year, which is less than the major source threshold of 100 tons per year. If the uncontrolled PTE is below the major source threshold, CAM is not triggered.

Condition 84: Gaseous non-methane hydrocarbon emissions from each stack shall not exceed 17.9 ppm (dry basis), corrected to 7% oxygen. [PSD-88-1B, Condition 7, 9/1/89 as revised on 2/9/96]

MRRR: The permittee is required to test non-methane hydrocarbon emissions annually. The permittee must maintain records, for a period of 5 years, of each test done.

SRSWS has performed an annual NMHC performance test on the baghouse outlet for the

past 10+ years. The annual HCl performance tests have not shown any instances where the NMHC emission limit was exceeded. The highest NMHC emissions measured during the annual performance test on the MWCs since 1991 is 7.8 ppm (dry) at 7% O₂. For the past five years, the measured NMHC has been < 1 ppm (dry) at 7% O₂. Since the measured NMHC emissions have been well below the required limit in the past, an annual performance test should be adequate monitoring to assure compliance with the NMHC emission limit. [NOC #170, Conditions B.1, B.2, B.3, & B.4, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06] [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

While not a part of the required MRRR for this requirement, the operation and maintenance plan (see Condition 57 above) will also add assurance that this requirement will be met, as it addresses proper operation and maintenance of the MWCs. In addition, the facility must meet other operational requirements that will add assurance that this requirement is met, including:

- maintaining the municipal waste combustor unit load level below 110% of the level during the most recent dioxins/furans test to ensure that the MWC is not overloaded, which could decrease destruction of organic compounds in the MWC (see Condition 102); and
- compliance with the CO emission limits, which ensure that optimum combustion conditions are maintained and that maximum destruction of organic compounds is achieved (see Condition 83).

Condition 85: With the exception of particulate, PM₁₀, SO₂, CO, lead, non-methane hydrocarbons, NO_x, beryllium, mercury, fluoride, and sulfuric acid mist, emissions shall be less than the significant levels in 40 CFR § 52.21(b)(23)(i) (1988). [PSD-88-1B, Condition 11, 9/1/89 as revised on 2/9/96]

MRRR: No monitoring is required. As with all permit terms, SRSWS must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition 86: Fluoride emissions shall not exceed 5.4 ppm (dry basis), corrected to 7% oxygen. [NOC #170, Condition A.1, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06]

MRRR: The permittee is required to test fluoride emissions annually. The permittee must maintain records, for a period of 5 years, of each test done.

SRSWS has performed an annual fluoride performance test on the baghouse outlet for the past 10+ years. The annual fluoride performance tests have not shown any instances where the fluoride emission limit was exceeded. The highest fluoride emissions measured during the annual performance test on the MWCs since 1991 is < 1 ppm (dry) at 7% O₂. Since the measured fluoride emissions have been well below the required limit in the past, an annual performance test should be adequate monitoring to assure compliance with the fluoride emission limit.

[NOC #170, Conditions B.1, B.2, B.3, & B.4, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06] [WAC 173-401-615(1) & (2), 10/4/93] Note: At least a portion of this MRRR is gapfilling.

Condition 87: Dioxins and furans emissions shall not exceed 0.50 nanogram per dry standard cubic meter expressed as toxic equivalency (TEQ), corrected to 7% oxygen, as provided in SCAPCA Order #95-10. [NOC #170, Condition A.1, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06 and SCAPCA Order #95-10, 8/15/95]

MRRR: The permittee is required to test dioxins/furans emissions annually. The permittee must maintain records, for a period of 5 years, of each test done.

SRSWS has performed an annual dioxins/furans performance test on the baghouse outlet for the past 10+ years. The annual D/F performance tests have not shown any instances where the D/F emission limit was exceeded. The highest D/F emissions measured during the annual performance test on the MWCs since 1991 is 0.13 ng/dscm (TEQ) at 7% O₂. Since the measured D/F emissions have been well below the required limit in the past, an annual performance test should be adequate monitoring to assure compliance with the D/F emission limit.

[NOC #170, Conditions B.1, B.2, B.3, & B.4, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06] [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

While not a part of the required MRRR for this requirement, the operation and maintenance plan (see Condition 57 above) will also add assurance that this requirement will be met, as it addresses proper operation and maintenance of the MWCs. In addition, the facility must meet other operational requirements that will add assurance that this requirement is met, including:

- maintaining the municipal waste combustor unit load level below 110% of the level during the most recent dioxins/furans test to ensure that the MWC is not overloaded, which could decrease destruction of organic compounds in the MWC (see Condition 102);
- maintaining the carbon injection level, if used during the most recent dioxin/furan test, at that present during the test (see Condition 103); and
- compliance with the CO emission limits, which ensure that optimum combustion conditions are maintained and that maximum destruction of organic compounds is achieved (see Condition 83).

Condition 88: Dioxins/furans emissions shall not exceed 30 nanograms per dry standard cubic meter (total mass), corrected to 7% oxygen. This standard shall apply at all times except during periods of startup, shutdown, or malfunction. Duration of startup, shutdown, and malfunction periods are limited to 3 hours per occurrence.

[SCAPCA Regulation I, Section 6.17.D.8 & 6.17.H, 1/13/99]

MRRR: The permittee is required to test dioxins/furans emissions annually. The permittee must maintain records, for a period of 5 years, of each test done. Twice a year the permittee must report to SCAPCA, the results of the two most recent performance tests, including any results documenting a violation of the emission limit.

SRSWS has performed an annual dioxins/furans performance test on the baghouse outlet for the past 10+ years. The annual D/F performance tests have not shown any instances where

the D/F emission limit was exceeded. The highest D/F emissions measured during the annual performance test on the MWCs since 1991 is 10 Ng/dscm (total mass) at 7% O₂. Since the measured D/F emissions have been well below the required limit in the past, an annual performance test should be adequate monitoring to assure compliance with the D/F emission limit.

[SCAPCA Regulation I, Section 6.17.H & 6.17.I, 1/13/99] [WAC 173-401-615(1) & (2), 9/16/02]

While not a part of the required MRRR for this requirement, the operation and maintenance plan (see Condition 57 above) will also add assurance that this requirement will be met, as it addresses proper operation and maintenance of the MWCs. In addition, the facility must meet other operational requirements that will add assurance that this requirement is met, including:

- maintaining the municipal waste combustor unit load level below 110% of the level during the most recent dioxins/furans test to ensure that the MWC is not overloaded, which could decrease destruction of organic compounds in the MWC (see Condition 102);
- if carbon injection is used during the most recent dioxin/furan test, maintaining the carbon injection level at that present during the test (see Condition 103); and
- compliance with the CO emission limits, which ensure that optimum combustion conditions are maintained and that maximum destruction of organic compounds is achieved (see Condition 83).

Condition 89: Lead emissions from each MWC shall not exceed 0.44 mg/dscm, corrected to 7% oxygen. This standard shall apply at all times except during periods of startup, shutdown, or malfunction. Duration of startup, shutdown, and malfunction periods are limited to 3 hours per occurrence.

[Condition 10S of this permit, see Section III. STREAMLINED REQUIREMENTS]

MRRR: Both of the MWC emission units at the WTE facility have emission limits that are subject to 40 CFR Part 64 – Compliance Assurance Monitoring (CAM). Per 64.2, the requirements of 40 CFR Part 64 apply to a pollutant-specific emissions units (PSEU) at a major source that is required to obtain a Part 70 permit if the unit satisfies all of the following criteria:

1. The PSEU must have pre-controlled emissions of the applicable pollutant which exceeds the major source thresholds established in WAC 173-401-200(17). In the case of the MWC emission units, SRSWS has estimated the pre-controlled PTE of lead to be 19 tpy per MWC. This exceeds the major source threshold of 10 tpy, established in WAC 173-401-200(17).
2. The PSEU must utilize air pollution control equipment to reduce emissions of the applicable pollutant to a level that meets the established emission limit(s). In the case of the MWCs, the lead emissions of the PSEU are controlled by a pulse-jet baghouse. It is not possible for the MWC to by-pass the baghouse. Therefore, CAM does not need to address the potential for bypass.
3. The PSEU must be subject to an emission limit for the applicable pollutant. In the case

of the MWCs, the PSEU is subject to the following lead emission limits:

- 0.001 gr/dscf at 7% O₂, given in Condition A.1 of NOC #170; and
- 0.44 mg/dscm, corrected to 7% O₂, given in SCAPCA Regulation I, Section 6.17.D.4 (which incorporates the requirements from 40 CFR 60, Subpart Cb)

The lead limits listed above have been streamlined to the limits given in Condition 89 and listed below to simplify the permit (see Condition 10S of Section III. STREAMLINED REQUIREMENTS for discussion of streamlining of lead emission standards):

Streamlined Lead Emission Limit for MWCs:

Lead emissions from each MWC shall not exceed 0.44 mg/dscm, corrected to 7% oxygen, as measured by RM 29. This standard shall apply at all times except during periods of startup, shutdown, or malfunction. Duration of startup, shutdown, and malfunction periods are limited to 3 hours per occurrence.

For emission units subject to CAM, if the post-controlled lead PTE is estimated to be more than 10 tons per year, the unit is considered a large emissions unit. For large emissions units, data collection frequency must be at least 4 times per hour. The post-controlled PTE of lead from each MWC is 0.35 tons per year, based on the lead emission limit contained in SCAPCA Regulation I, Section 6.17.D.4 and the airflow during the 2004 stack test. Therefore, each MWC is not considered to be a large emissions unit, since post-controlled lead PTE is less than 10 tons per year. Per 40 CFR 64.3(b)(iii), the frequency of data collection may be less frequent than 4 times per hour, but must include some data collection at least once per 24-hour period.

SRSWS has proposed to use the monitoring contained in 40 CFR 60, Subpart Cb (as implemented in SCAPCA Regulation I, Section 6.17) to meet the CAM requirements for the streamlined lead standard that applies to the MWCs.

In a letter dated July 7, 1999, EPA responded to an inquiry posed by a facility as to whether using the monitoring contained in 40 CFR 60, Subparts Eb and Cb could be used to satisfy title V periodic monitoring (40 CFR Part 70) or compliance assurance monitoring (40 CFR Part 64) requirements for other applicable requirements under existing air pollution regulations, such as State implementation plans (SIPs). Per the July 7, 1999 letter from Steven Hitte of EPA to Ms. Maria Zannes of Integrated Waste Services Association, "the monitoring requirements in subpart Eb are rigorous and specify use of continuous monitoring systems for opacity, for emissions of acid gases, organic gases, and nitrogen oxides, and for operational parameters that serve as surrogates for monitoring compliance with particulate matter, dioxins and furans, and metals emissions limits." The monitoring requirements given in 40 CFR 60, Subpart Eb, referenced in EPA's letter, are virtually identical to the monitoring requirements given in 40 CFR 60, Subpart Cb, which is applicable to the WTE facility. Per EPA's letter, "we expect that in most cases monitoring that complies with the requirements in subpart Eb will also provide the assurance of compliance required by part 70 or part 64 for other emissions limitations or standards for the same or similar pollutants." EPA's letter states further, "whether the monitoring in subpart Eb alone is sufficient to satisfy part 70 or part 64 monitoring requirements for emissions limitations not addressed in subpart Eb must be evaluated on a case-by-case basis by the permitting authority in the title V permit application review and approval process. Where possible, as determined through the permitting authority on a case-by-case basis, we fully support simplifying monitoring

requirements for permits, including through the application of one monitoring approach for multiple emissions limitations of the same pollutant or dissimilar pollutants.”

The Subpart Cb lead emission limit, 0.44 mg/dscm corrected to 7% O₂, is presumed to have sufficient monitoring in Subpart Cb (because it is a post 1990 standard pursuant to Section 111 and 112 of the FCAA) and therefore is not subject to CAM. The monitoring related to the lead emission limit in Subpart Cb consists of an annual performance testing using EPA Method 29. In addition, 40 CFR 60, Subpart Cb contains opacity monitoring requirements under 40 CFR 60.58b and 40 CFR 60.38b, which are used as an indicator of particulate control device performance to provide assurance that PM emissions are minimized and a surrogate for continuous lead emission monitoring.

SRSWS has proposed to use the Subpart Cb monitoring (i.e., annual lead performance test and continuous opacity monitoring) for the lead emission limits that are subject to CAM requirements (i.e., NOC #170 lead emission limit). Using the Subpart Cb monitoring should be adequate for the other lead emission limit because the Subpart Cb lead emission limit is the most stringent lead limit that the MWC is required to meet. Per the EPA letter referenced above, in most cases monitoring that complies with the requirements in subpart Eb will also provide the assurance of compliance required by part 64 for other emissions limitations or standards for the same pollutants. Therefore, since there is no reason to believe that the monitoring established for lead under Subpart Cb would not be sufficient for the other lead emission standard given in NOC #170, the PSD permit, the Subpart Cb monitoring will be applied as CAM for the NOC #170 lead emission limit.

SRSWS has performed an annual lead performance test on the baghouse outlet for the past 10+ years. The annual lead performance tests have not shown any instances where the lead emission limits were exceeded. The highest lead emissions measured during the annual performance test on the MWCs since 1991 is < 0.05 mg/dscm. Therefore, the Subpart Cb monitoring, consisting of an annual lead test and continuous opacity monitoring, should be acceptable for the lead emission standards subject to CAM. Per the EPA letter referenced above, in most cases monitoring that complies with the requirements in subpart Eb will also provide the assurance of compliance required by part 64 for other emissions limitations or standards for the same pollutants. Therefore, since there is no reason to believe that the monitoring established for lead under Subpart Cb would not be sufficient for the other lead emission standard, given in NOC #170, the Subpart Cb monitoring will be applied as CAM for the lead emission limit.

The monitoring contained in 40 CFR 60, Subpart Cb (as implemented in SCAPCA Regulation I, Section 6.17), which will be used as CAM for the NOC #170 lead emission limit, requires that the permittee test lead emissions from each MWC annually. The permittee must maintain records, for a period of 5 years, of each test done. Twice a year the permittee must report to SCAPCA, the results of the two most recent performance tests, including any results documenting a violation of the lead emission limit given in Cb.

In addition, since opacity is a surrogate and indicator of particulate, which includes lead emissions, the opacity monitoring required under 40 CFR 58b and 40 CFR 60.38b will be used as an indicator of baghouse performance. Under the required opacity monitoring, the permittee is required to continuously monitor opacity from each baghouse outlet, maintain records for the monitored opacity data, including all 6-minute average opacity levels, and submit a monthly summary of the monitoring data. Since the required opacity monitoring is

required to generate 6-minute average opacity levels, this meets the CAM requirement given in 40 CFR 64.3(b)(iii), to have some data collection at least once per 24-hour period.

[NOC #170, Conditions B.1, B.2, B.3, B.4, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06] [SCAPCA Regulation I, Sections 6.17.H & I, 1/13/99] [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

While not a part of CAM for the lead emission limits, the operation and maintenance plan (see Condition 57 above) will also add assurance that the lead emission limit will be met, as it addresses proper operation and maintenance of the control equipment. In addition, the facility must meet operational requirements that will add assurance that this requirement is met, including:

- keeping spare bags on site to minimize replacement time if a faulty bag is found in the baghouse (see Condition 99 of the permit); and
- monitoring the MWC baghouse pressure drop to minimize the likelihood that a problem with the baghouse could go unnoticed (see Condition 6M.i of the permit).

Condition 90: Cadmium emissions shall not exceed 0.040 mg/dscm, corrected to 7% oxygen. This standard shall apply at all times except during periods of startup, shutdown, or malfunction. Duration of startup, shutdown, and malfunction periods are limited to 3 hours per occurrence. [SCAPCA Regulation I, Section 6.17.D.3 & 6.17.H, 1/13/99]

MRRR: The permittee is required to test cadmium emissions annually. The permittee must maintain records, for a period of 5 years, of each test done. Twice a year the permittee must report to SCAPCA, the results of the two most recent performance tests, including any results documenting a violation of the emission limit.

SRSWS has performed an annual cadmium performance test on the baghouse outlet for the past 10+ years. The annual D/F performance tests have not shown any instances where the cadmium emission limit was exceeded. The highest cadmium emissions measured during the annual performance test on the MWCs since 1991 is 0.002 mg/dscm at 7% O₂. Since the measured cadmium emissions have been well below the required limit in the past, an annual performance test should be adequate monitoring to assure compliance with the cadmium emission limit.

[NOC #170, Conditions B.1, B.2, B.3, & B.4, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06] [SCAPCA Regulation I, Section 6.17.H & 6.17.I, 1/13/99] [WAC 173-401-615(1) & (2), 9/16/02]

While not a part of the required MRRR for this requirement, the operation and maintenance plan (see Condition 57 above) will also add assurance that this requirement will be met, as it addresses proper operation and maintenance of the control equipment. In addition, the facility must meet other operational requirements that will add assurance that this requirement is met, including:

- keeping spare bags on site to minimize replacement time if a faulty bag is found in the baghouse (see Condition 99 of the permit);
- monitoring the MWC baghouse pressure drop to minimize the likelihood that a problem with the baghouse could go unnoticed (see Condition 6M.i of the permit); and

- continuous monitoring of opacity (since opacity correlates to PM emissions and PM contains cadmium) (see Condition 79 of the permit).

Condition 91: Mercury emissions shall not exceed 0.080 mg/dscm, corrected to 7% oxygen, or uncontrolled emissions shall be reduced by at least 85% by weight. This standard shall apply at all times except during periods of startup, shutdown, or malfunction. Duration of startup, shutdown, and malfunction periods are limited to 3 hours per occurrence. [SCAPCA Regulation I, Section 6.17.D.5 & 6.17.H, 1/13/99]

MRRR: The permittee is required to test mercury emissions annually. The permittee must maintain records, for a period of 5 years, of each test done. Twice a year the permittee must report to SCAPCA, the results of the two most recent performance tests, including any results documenting a violation of the emission limit.

SRSWS has performed an annual mercury performance test on the baghouse outlet for the past 10+ years. The annual mercury performance tests have not shown any instances where Subpart Cb mercury emission limit (which became effective in 1999) were exceeded.

[NOC #170, Conditions B.1, B.2, B.3, & B.4, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06] [SCAPCA Regulation I, Section 6.17.H & 6.17.I, 1/13/99] [WAC 173-401-615(1) & (2), 9/16/02]

While not a part of the required MRRR for this requirement, the operation and maintenance plan (see Condition 57 above) will also add assurance that this requirement will be met, as it addresses proper operation and maintenance of the control equipment. In addition, the facility must meet other operational requirements that will add assurance that this requirement is met, including:

- if carbon injection is used to comply with the mercury emission limit, maintaining the carbon injection level at that present during the most recent dioxins/furans test (see Condition 103);
- keeping spare bags on site to minimize replacement time if a faulty bag is found in the baghouse (see Condition 99 of the permit);
- maintaining the MWC baghouse inlet temperatures below a specified limit, thereby minimizing the amount of condensable PM, which could contain mercury, that will pass through the baghouses (see Condition 101 of the permit);
- monitoring the MWC baghouse pressure drop to minimize the likelihood that a problem with the baghouse could go unnoticed (see Condition 6M.i of the permit); and
- continuous monitoring of opacity (since opacity correlates to PM emissions and PM may contain mercury) (see Condition 79 of the permit).

Condition 92: Whenever solid waste is burned,

- a. A combustion gas retention time of at least one second shall be maintained in the combustion zone at a minimum temperature of 1800°F; and
- b. The final combustion zone temperature of the MWC shall not be below 1800°F for any 15-minute average, nor below 1600°F for any individual reading.

The superheater outlet temperature may be used as a surrogate measure of the final combustion zone temperature. In such case, except during periods of start-up, the superheater outlet temperature shall not be less than 900°F, based on a 15-minute average. Periods of startup are limited to 3 hours per occurrence.

An alternate temperature may be used as a surrogate measure of the final combustion temperature, provided that the following are met: the temperature is measured by a permanently installed thermocouple(s) or equivalent temperature sensing device; the method for determining the correlation between the proposed temperature and the final combustion temperature is approved by SCAPCA; a correlation with the final combustion temperature is established; and design specifications, showing the location of the sensing device, are submitted to and approved by SCAPCA prior to installation.

[Condition 11S of this permit, see Section III. STREAMLINED REQUIREMENTS]

MRRR: In a letter dated April 27, 1994, SCAPCA approved SRSWS's proposed procedures (contained in Wheelabrator memo, December 7, 1993) to use a correlated minimum value of 900° F, based on the temperature at the superheater outlet as a means to demonstrate compliance with the requirement to maintain a minimum temperature of 1800° F in the combustion zone. Therefore, the permittee is required to continuously monitor the superheater outlet temperature. Records of the monitoring data must be kept and summary data must be reported to SCAPCA monthly.

[WAC 173-434-170, 12/22/03] [PSD-88-1B, Condition 13 & 28, 9/1/89 as revised on 2/9/96] [NOC #170, Condition D.1, E.2, & F.3, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06] [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

Condition 93: During all startups, natural gas shall be used to preheat the combustion chamber to at least 1800°F prior to the ignition of solid waste. During shutdown natural gas shall be used to ensure that the required minimum temperature of 1800°F is met while solid waste is burning. [NOC #170, Condition D.2, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06]

MRRR: In a letter dated April 27, 1994, SCAPCA approved SRSWS's proposed procedures (contained in Wheelabrator memo, December 7, 1993) to use a correlated minimum value of 900° F, based on the temperature at the superheater outlet as a means to demonstrate compliance with the requirement to maintain a minimum temperature of 1800° F in the combustion zone. Therefore, the permittee is required to continuously monitor the superheater outlet temperature. Records of the monitoring data must be kept and summary data must be reported to SCAPCA monthly.

[WAC 173-434-170, 12/22/03] [PSD-88-1B, Condition 13 & 28, 9/1/89 as revised on 2/9/96] [NOC #170, Condition D.1, E.2, & F.3, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06] [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

Condition 94: The air distribution shall be fully controllable where pressurized air is introduced and the airflow shall be monitored and recorded. [WAC 173-434-160(1)(d), 12/22/03] [PSD-88-1B, Condition 28, 9/1/89 as revised on 2/9/96]

- MRRR:** The permittee must continuously monitor the combustion air distribution. Records of all 1-hour average airflow rates of pressurized combustion air introduced into each MWC must be kept.
- [WAC 173-434-160(5), 12/22/03] [PSD-88-1B, Condition 28, 9/1/89 as revised on 2/9/96]
[WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.
- Condition 95:** Only solid waste and natural gas shall be burned in the combustion chamber. Solid waste shall be determined consistent with the mediated agreements as detailed in Tony Grover's (Department of Ecology) memorandum dated March 2, 1998. [NOC #170, Condition D.2, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06]
- MRRR:** The permittee is required to keep records of the types and amounts of fuels burned daily. The daily amounts of natural gas and solid waste burned must be reported to SCAPCA in monthly reports. [NOC #170, Condition F.1 & F.2, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06] [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.
- Condition 96:** No more than 150 tons per month of out-of-county oil and fuel line filters and petroleum contaminated commercial wastes may be accepted by the facility [Mediated Agreement 3, detailed in Tony Grover's (Department of Ecology) memorandum dated 3/2/98, as clarified in letter from SCAPCA dated 8/6/98 - STATE/LOCAL ONLY]
- MRRR:** The permittee is required to keep monthly records of the amount of out-of-county oil and fuel line filters and petroleum contaminated commercial wastes accepted by the facility. A summary of the non-typical wastes received by the facility must be submitted to SCAPCA semi-annually. [Mediated Agreement 3, detailed in Tony Grover's (Department of Ecology) memorandum dated 3/2/98, as clarified in letter from SCAPCA dated 8/6/98] – STATE/LOCAL ONLY [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.
- Condition 97:** Petroleum contaminated commercial waste materials (adsorbent materials, etc...) from spills of 1000 gallons or more shall not be accepted by the facility [Mediated Agreement 3, detailed in Tony Grover's (Department of Ecology) memorandum dated 3/2/98, as clarified in letter from SCAPCA dated 8/6/98 - STATE/LOCAL ONLY]
- MRRR:** For petroleum contaminated commercial waste materials (adsorbent materials, etc.) received by the facility that are generated from spill clean up activities, the permittee is required to keep records of the total volume of the spill. A summary of the non-typical wastes received by the facility must be submitted to SCAPCA semi-annually. [Mediated Agreement 3, detailed in Tony Grover's (Department of Ecology) memorandum dated 3/2/98, as clarified in letter from SCAPCA dated 8/6/98] – STATE/LOCAL ONLY [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.
- Condition 98:** Only natural gas shall be used to fire the auxiliary burners. The annual capacity factor for use of natural gas, as determined by 40 CFR Part 60 Subpart Db shall be less than 10%. If the capacity factor is greater than 10%, then the facility shall be subject to 40 CFR 60.44b. [PSD-88-1B, Condition 26(b), 9/1/89 as revised on 2/9/96]

MRRR: The permittee must keep records of the amount of natural gas used and calculate the annual capacity factor (12-month rolling average) at the end of each month. Records must be kept of each calculated annual capacity factor. [WAC 173-434-110, 12/22/03] [PSD-88-1B, Condition 28, 9/1/89 as revised on 2/9/96] [WAC 173-400-115(1), 1/10/05] [40 CFR § 60.49b(d), 1996] [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

Condition 99: A spare set of bags (1/4 of the total number) shall be maintained on the premises at all times. [NOC #170, Condition D.9, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06] [PSD-88-1B, Condition 17, 9/1/89 as revised on 2/9/96]

MRRR: No monitoring is required. As with all permit terms, SRSWS must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition 100: Four usable spare dual-fluid nozzles for the spray dryer absorbers shall be kept readily available at the facility at all times. [NOC #170, Condition D.7, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06]

MRRR: No monitoring is required. As with all permit terms, SRSWS must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition 101: The inlet temperature to each MWC baghouse, based on a four-hour block average, shall not exceed the following:

- a. Except as otherwise allowed in SCAPCA Regulation I, Section 6.17.E, 17°C above the maximum demonstrated particulate matter control device temperature as determined by the procedures in SCAPCA Regulation I, Section 6.17.H; and
- b. 300°F, unless approved under Condition D.3 of NOC #170 and Condition 15 of PSD-88-1B.

[Condition 12S of this permit, see Section III. STREAMLINED REQUIREMENTS]

MRRR: The permittee must determine the maximum demonstrated particulate matter control device temperature during each annual performance test. The permittee must maintain records, for a period of 5 years, of each test done.

The permittee must continuously monitor the MWC baghouse inlet temperatures to determine whether the temperature is equal to or less than 17°C above the maximum demonstrated particulate matter control device temperature (never to exceed 300°F). Records of the monitoring data must be kept and summary data must be reported to SCAPCA monthly. Twice a year the permittee must submit a summary of monitored data and report any deviations from the requirement. [WAC 173-434-170, 12/22/03] [PSD-88-1B, Condition 28, 9/1/89 as revised on 2/9/96] [SCAPCA Regulation I, Section 6.17.H & 6.17.I, 1/13/99] [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

Condition 102: The maximum load level or allowable firing rate of each MWC, as measured by steam flow,

shall not exceed the following:

- 110% of the maximum demonstrated MWC unit load level, during the last dioxins/furans performance test, except as otherwise allowed in SCAPCA Regulation I, Section 6.17.E; and
- the highest level at which compliance has been demonstrated during any source test performed on the MWC.

[Condition 13S of this permit, see Section III. STREAMLINED REQUIREMENTS]

MRRR: The permittee must determine the maximum demonstrated MWC unit load level during each annual performance test. The permittee must maintain records, for a period of 5 years, of each test done.

The permittee must continuously monitor and keep records of the MWC load to determine whether the load is equal to or less than 110% above the maximum demonstrated MWC unit load during the last dioxins / furans performance test (never to exceed the maximum level at which compliance has been demonstrated during any source test performed on the MWC). Twice a year the permittee must submit a summary of monitored data and report any deviations from the requirement.

[SCAPCA Regulation I, Section 6.17.H & 6.17.I, 1/13/99] [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

Condition 103: If activated carbon injection is used to comply with the mercury and/or dioxins/furans emission limits, the carbon injection system operating parameter(s) that are the primary indicator(s) of the carbon mass feed rate must equal or exceed the level(s) documented during the last performance test. This standard shall apply at all times except during periods of startup, shutdown, or malfunction. Duration of startup, shutdown, and malfunction periods are limited to 3 hours per occurrence. [SCAPCA Regulation I, Section 6.17.H, 1/13/99] [NOC #1057, Condition 5.b., 2/14/01]

MRRR: If carbon injection is used to comply with the mercury and/or dioxins/furans emission limits, the permittee must determine the carbon injection rate during each annual performance test. The permittee must maintain records, for a period of 5 years, of each test done.

The permittee must monitor the carbon injection rate to determine whether the rate is equal to or greater than the level present during the most recent test. Twice a year the permittee must submit a report of any deviations from the requirement.

[SCAPCA Regulation I, Section 6.17.H & 6.17.I, 1/13/99] [NOC #1057, Condition 5.a.,c.,d, & e., 2/14/01] [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

Condition 104: Sampling ports meeting the requirements of 40 CFR Part 60, Appendix A, must be provided in the ducts following the combustor/boilers preceding the spray dry absorbers. [NOC #170, Condition B.5, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06]

MRRR: No monitoring is required. As with all permit terms, SRSWS must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this

requirement was met during the reporting period.

Condition 105: Sampling ports meeting the requirements of 40 CFR Part 60, Appendix A, must be provided in the ducts downstream of the baghouses. [PSD-88-1B, Condition 24, 9/1/89 as revised on 2/9/96] [NOC #170, Condition B.5, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06] [WAC 173-400-115(1), 10/23/98] [PSD-88-1B, Condition 28, 9/1/89 as revised on 2/9/96] [40 CFR § 60.8(e), 1996]

MRRR: No monitoring is required. As with all permit terms, SRSWS must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition 106: In the event of air pollution control equipment failure, the permittee shall immediately curtail any additional input of solid waste and shall maintain a minimum temperature of 1800°F in the combustion zone until all solid waste in the incinerators is incinerated. If the temperature falls below 1800°F, natural gas shall be used to maintain a minimum temperature of 1800°F. [NOC #170, Condition D.4, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06]

MRRR: The permittee must continuously monitor the combustion temperature or a parameter that correlates to combustion temperature (e.g., superheater outlet temperature) and keep records of the monitoring to ensure that the 1800° F combustion zone minimum temperature requirement is met. The permittee must report shutdowns in the monthly report.

[NOC #170, Condition D.1, E.2, F.2, & F.3, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06] [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

While not a part of the required MRRR for this requirement, the operation and maintenance plan (see Condition 57 above) will also add assurance that this requirement will be met, as the plan contains procedures that must be used during malfunctions and shutdowns.

Condition 107: The MWC units shall not be operated at any time unless one of the following persons is on duty and at the facility: a chief facility operator or shift supervisor who is fully certified either with the American Society of Mechanical Engineers or a State certification program deemed to be equivalent by EPA, or a chief facility operator or shift supervisor who has obtained a provisional operator certification from either the American Society of Mechanical Engineers or a State certification program deemed to be equivalent by EPA and is scheduled to take the full certification exam, unless otherwise allowed in SCAPCA Regulation I, Section 6.17.F. A provisionally certified control room operator may stand-in for a certified plant or shift supervisor when they are off-site for (1) periods of up to eight hours without notification of SCAPCA, (2) periods up to two weeks if SCAPCA is notified, and (3) periods longer than two weeks with SCAPCA approval.

MRRR: The permittee is required to keep records of training for employees.

It should be noted that the last sentence in Condition 107, which allows a provisionally certified control room operator to stand in for a certified plant or shift supervisor, is not specifically included in SCAPCA Regulation I, Section 6.17. However, this allowance is included in EPA guidance from John S. Seitz, Director of Office of Air Quality Planning &

Standards (see document dated May 14, 1998). This guidance was recently adopted in the promulgated revisions to 40 CFR 60, Subpart Cb, which will be incorporated into SCAPCA Regulation I, Section 6.17 in the future.

[SCAPCA Regulation I, Section 6.17.I, 1/13/99] [WAC 173-401-615(1) & (2), 9/16/02]

Condition 108: A copy of NOC #1057 shall be kept on site and made available to SCAPCA personnel upon request. [NOC #1057, Condition 3, 2/14/01 - STATE/LOCAL ONLY]

MRRR: No monitoring is required. As with all permit terms, SRSWS must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition 109: The carbon injection system shall be maintained in proper working condition. [NOC #1057, Condition 4, 2/14/01 – STATE/LOCAL ONLY]

MRRR: The permittee is required to perform periodic checks and maintenance on the carbon injection system at least as frequently as recommended in the manufacturer's operation and maintenance manual. If the carbon injection system is used during a performance test (i.e. to comply with the mercury and/or dioxins/furans emissions limits), the following records must be kept from the day the performance test is conducted until the day the next performance test is conducted: dates and results of all periodic checks performed on the carbon injection system; and dates and nature of all maintenance performed on the carbon injection system. [NOC #1057, Condition 4, 2/14/01 – STATE/LOCAL ONLY]

Condition 110: The U2A urea to ammonia reagent conversion equipment for the NOx control system shall be maintained in proper working condition. [NOC #1241, Condition 3, 10/8/04 – STATE / LOCAL ONLY]

MRRR: The permittee is required to develop and implement an operation and maintenance plan within 30 days of start-up of the U2A urea to ammonia reagent conversion equipment for the NOx control system. The plan shall include, at a minimum:

- a. A description and schedule for all manufacturer recommended operation and maintenance activities; and
- b. A description and schedule for periodic equipment inspections.

Maintenance records must be kept of the dates and nature of all manufacturer recommended operation and maintenance performed on the equipment, dates and results of all equipment inspections performed, and dates and nature of any other maintenance performed. [NOC #1241, Condition 3, 10/8/04 – STATE / LOCAL ONLY]

There are several air quality requirements (e.g., in the NOC, PSD, 40 CFR Part 60, etc...) that are either one-time MWC requirements that have been fulfilled, that were included for informational purposes only, or for some other reason no longer apply. These conditions are listed below and are not included in SRSWS's operating permit.

Citation	Description	Reason not included in the permit
PSD-88-1B, Condition 23,	These conditions require an initial	This is a one-time condition that has been met.

Citation	Description	Reason not included in the permit
9/1/89 as revised on 2/9/96 NOC #170, Condition A.1, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06	performance test.	
SCAPCA Regulation I, Section 6.17.H (initial performance testing and initial performance evaluations), 1/13/99	Portions of this section of SCAPCA's regulation requires an initial performance test for various pollutants and initial performance evaluations of the facility's continuous emission monitoring system (CEMS).	The initial performance test was completed in May of 2000. The performance evaluation of the CEMS was completed during the facility's first year of operation. Since that time the CEMS has passed all quarterly cylinder gas audits (CGAs) and all relative accuracy test audits (RATAs). Continued annual testing, CGAs, and RATAs are required under the operating permit.
SCAPCA Regulation I, Section 6.17.I (initial performance test report), 1/13/99	Portions of this section of SCAPCA's regulation require the permittee to submit an initial performance test report documenting the results from the initial performance test.	The initial performance test report was submitted to SCAPCA in September of 2000.
40 CFR § 60.8 & § 60.46b(b) & (d)	This is an initial performance test requirement.	The facility has performed the initial performance test.
40 CFR §60.8 & § 60.54	This is an initial performance test requirement.	The facility has performed the initial performance test.
NOC #1057, Condition 1, 2/14/01 – STATE/LOCAL ONLY	This is an initial start-up notification requirement	The facility has met the start-up notification requirement.
NOC #1057, Condition 2, 2/14/01 – STATE/LOCAL ONLY	This is a requirement to commence construction within 18 months of receipt of the approval	The facility has completed construction of the equipment covered under NOC #1057
NOC #1241, Condition 1, 10/8/04 – STATE/LOCAL ONLY	This is an initial start-up notification requirement	The facility has met the start-up notification requirement.
NOC #1241, Condition 2, 10/8/04 – STATE/LOCAL ONLY	This is a requirement to commence construction within 18 months of receipt of the approval	The facility has completed construction of the equipment covered under NOC #1241
SCAPCA Regulation I, Section 6.17.F, which adopts the requirements from 40 CFR 60.54b(a), (b), (d)	These are initial operator training and certification requirements that were required to be met by December 1, 1999	The initial training and certification requirements have been met.

Miscellaneous Units Emission Limitations

This section covers miscellaneous significant emission units located at the SRSWS facility. The two units that fall into this category are the lime silo and the ash handling system scrubber, located in the ash handling building.

It should be noted that emissions from the lime silo are controlled by a baghouse that exhausts inside a building. Normally, SCAPCA does not consider such sources to be emission points (although a vent located near such a source could be an emission point). However, in the PSD permit issued for the facility, there is a grainloading requirement for the lime silo baghouse. When SRSWS asked Ecology whether the requirement still applies, even though the unit exhausts inside, Ecology responded that the requirement applies. As such the requirement must be included in the air operating permit. However, in keeping with

SCAPCA's treatment of such unit at other facilities, the general requirements (e.g., 20% opacity, 0.1 gr/dscf, etc...) are not included in the permit.

The following requirement(s) are included in this subsection.

Condition 111: Particulate matter emissions from the lime storage silo shall not exceed 0.01 grains per actual cubic foot. [PSD-88-1B, Condition 10, 9/1/89 as revised on 2/9/96]

MRRR: Since the lime silo exhausts inside, it is not possible to do visual emission (i.e., opacity) readings, per EPA Method 9 or Ecology Method 9A. Therefore, the monitoring focuses on ensuring that the baghouse that controls particulate emissions from the lime silo is operating properly. The permittee is required to monitor the pressure drop across the baghouse and provide a read-out of the pressure drop in the control room. [PSD-88-1B, Condition 16, 9/1/89 as revised on 2/9/96]

Condition 112: A copy of NOC #934 shall be kept on site and made available to SCAPCA personnel upon request. [NOC #934, Condition 1, 10/27/00 as revised on 4/10/06 and 4/14/06 - STATE/LOCAL ONLY]

MRRR: No monitoring is required. As with all permit terms, SRSWS must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition 113: The scrubber system shall be maintained in proper working condition. [NOC #934, Condition 3, 10/27/00 as revised on 4/10/06 and 4/14/06- STATE/LOCAL ONLY]

MRRR: The permittee is required to develop and implement an operation and maintenance plan for the scrubber, which includes a schedule for maintaining the blower bearings, drive, and motor; periodic checks of the irrigation system and piping; daily checks of the pressure drop across the scrubber section to ensure it is within the normal operating range of 6-10 inches of water; and periodic checks of the mist eliminator to make sure there is no pluggage. Maintenance records shall be kept for the previous 5 years of operation.

In addition, the scrubber system is required to be equipped with a pressure drop sensor across the scrubber section. A read-out from the sensor shall be maintained in the control room in a location that can be readily observed by staff responsible for maintaining proper equipment operating parameters. When the pressure drop across the scrubber section falls outside the normal operating range of 6.0 to 10.0 inches of water, prompt action is required to bring the pressure drop back into the normal operating range. Action shall be initiated upon discovery and may include, but is not limited to, dispatching an employee to investigate, notifying maintenance and entering a work order into the plant's preventative maintenance program, shutting down the scrubber, etc.... If corrective action is anticipated to take longer than eight hours to complete (e.g., parts must be ordered, etc...), the scrubber must be shut down until repairs can be made.

[NOC #934, Condition 2 & 3, 10/27/00 as revised on 4/10/06 and 4/14/06- STATE/LOCAL ONLY]

Fugitive Emission Limitations

This subsection of the permit contains applicable emission limitations applying to fugitive emissions at the facility. The sources of fugitive emissions covered under this subsection include ash handling, roadways, and parking lots. The following requirements are included in this subsection.

Condition 114: Reasonable precautions shall be taken to prevent fugitive emissions which includes paving normally traveled roadways within the site and enclosing or hooding material transfer points. [PSD-88-1B, Condition 28, 9/1/89 as revised on 2/9/96] [WAC 173-434-130(5), 12/22/03]

MRRR: The permittee is required to investigate any complaints that it may receive regarding fugitive dust. If problems are found corrective action must be taken. Records of each complaint received, along with the results of the subsequent investigation, must be kept. [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

While not a part of the required MRRR for this requirement, the operation and maintenance plan (see Condition 57 above) will also add assurance that this requirement will be met, as it must contain a program for keeping traveled roadways free of visible dust.

Condition 115: All roads used on a daily basis shall be paved and be kept clean to avoid fugitive emissions. In addition, all parking areas used on a daily basis shall either be paved or graveled to prevent fugitive emissions. All graveled areas must be properly maintained, which may include re-application of the gravel and/or application of an appropriate dust palliative to minimize dust. [NOC #170, Condition C.1, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06]

MRRR: The permittee is required to investigate any complaints that it may receive regarding fugitive emissions from roads or parking lots. If problems are found corrective action must be taken. Records of each complaint received, along with the results of the subsequent investigation, must be kept. [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

While not a part of the required MRRR for this requirement, the operation and maintenance plan (see Condition 57 above) will also add assurance that this requirement will be met, as it must contain a program for keeping traveled roadways free of visible dust.

Condition 116: The truck access doors to the facility receiving area must remain closed except during normal working shifts when refuse is being received or transferred, or during short durations to allow vehicle passage. [NOC #170, Condition C.5, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06] [PSD-88-1B, Condition 21, 9/1/89 as revised on 2/9/96]

MRRR: The permittee is required to investigate any complaints that it may receive regarding odors from the tipping area. If problems are found corrective action must be taken. Records of each complaint received, along with the results of the subsequent investigation, must be kept. [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

While not a part of the required MRRR for this requirement, the operation and maintenance plan (see Condition 57 above) will also add assurance that this requirement will be met, as it must contain proper operating procedures for the facility.

Condition 117: The permittee shall meet the following ash handling and transport requirements:

- a. Residue from the grates, grate siftings, ash from the combustors, economizers, superheaters, flyash from the spray dry absorber, and fabric filter hoppers shall be thoroughly wetted or treated to prevent fugitive emissions, prior to further handling;
- b. Solid material shall not leave the quench tanks in a dry condition that creates dust;
- c. The ash/residue in the storage building must remain sufficiently moist to prevent dust during storage and handling operations;
- d. Ash and residue, transported from the ash residue storage building, shall be transported only in covered trucks or containers. The covers must be in place for the return trip to the facility. The exterior of the trucks and containers, used to transport the ash, must be inspected and, if necessary, cleaned before leaving the ash storage facility. Cleaning must be done by water spray or an alternative method, approved by Ecology;
- e. Excess water from the covered ash trucks shall be controlled, using a method submitted to and approved by Ecology, prior to leaving the site to prevent spillage of excess water onto the public right of way;
- f. The ash truck loading area shall be enclosed at all times, except when a person or vehicle is entering or leaving;
- g. All conveyors and chutes for dry fly ash and dry bottom ash shall be totally enclosed and dust-tight. Dry ash shall be stored inside buildings or other enclosures to prevent entrainment into the outside air; and
- h. Except as otherwise allowed in i. and ii. below, emissions of combustion ash from an ash conveying system (including conveyor transfer points) shall not be visible in excess of 5 percent of the observation period (e.g., 9 minutes per 3-hour period), as determined by RM 22 observations as specified in 5M.
 - i. This limit does not cover visible emissions discharged inside buildings or enclosures of ash conveying systems; however, the emissions limit specified does cover visible emissions discharged to the atmosphere from buildings or enclosures of ash conveying systems.
 - ii. This limit does not apply during maintenance and repair of ash conveying systems.

[Condition 2S of this permit, see Section III. STREAMLINED REQUIREMENTS]

MRRR: The permittee is required to investigate any complaints that it may receive regarding ash handling. If problems are found, corrective action must be taken. Records of each complaint received, along with the results of the subsequent investigation, must be kept.

In addition, the permittee is required to test fugitive ash emissions annually. The permittee must maintain records, for a period of 5 years, of each test done. Twice a year the permittee must report to SCAPCA, the results of the two most recent performance tests, including any results documenting a violation of the emission limit.

[SCAPCA Regulation I, Section 6.17.H & 6.17.I, 1/13/99] [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

While not a part of the required MRRR for this requirement, the operation and maintenance plan (see Condition 57 above) will also add assurance that this requirement will be met, as it must contain a program for keeping traveled roadways free of visible dust.

There are several air quality requirements (e.g., in the NOC, PSD, 40 CFR Part 60, etc...) that are either one-time fugitive emissions requirements that have been fulfilled, that were included for informational purposes only, or for some other reason no longer apply. These conditions are listed below and are not included in SRSWS's operating permit.

Citation	Description	Reason not included in the permit
SCAPCA Regulation I, Section 6.17.H (initial performance testing and initial performance evaluations), 1/13/99	Portions of this section of SCAPCA's regulation requires an initial performance test for various pollutants and initial performance evaluations of the facility's continuous emission monitoring system (CEMS).	The initial performance test was completed in May of 2000. The performance evaluation of the CEMS was completed during the facility's first year of operation. Since that time, the CEMS has passed all quarterly cylinder gas audits (CGAs) and all relative accuracy test audits (RATAs). Continued annual testing, CGAs, and RATAs are required under the operating permit.
SCAPCA Regulation I, Section 6.17.I (initial performance test report), 1/13/99	Portions of this section of SCAPCA's regulation require the permittee to submit an initial performance test report documenting the results from the initial performance test.	The initial performance test report was submitted to SCAPCA in September of 2000.

Design Parameter Requirements

This subsection of the permit contains applicable design parameter requirements that apply to the facility. The following requirements are included in this subsection.

Condition 118: No use of excess stack height or dispersion techniques to meet ambient air quality standards or PSD increments except as allowed under WAC 173-400-200. [WAC 173-400-200, 1/10/05(2/19/91)]

MRRR: No monitoring is required. As with all permit terms, SRSWS must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition 119: No varying of emissions according to atmospheric conditions or ambient concentrations except as allowed under WAC 173-400-205. [WAC 173-400-205, 2/19/91]

MRRR: No monitoring is required. As with all permit terms, SRSWS must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition 120: Refuse must be burned in an approved multi-chambered incinerator or equipment found to be equally effective by the Control Officer. (The two MWCs have been approved under NOC #170). [SCAPCA Regulation I, Section 6.03.B, 3/4/04 – STATE / LOCAL ONLY]

MRRR: No monitoring is required. As with all permit terms, SRSWS must certify compliance with this

condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition 121: Operation of an incinerator is allowed during daylight hours only unless otherwise approved by the Control Officer. (The two MWCs are approved for 24-hour per day operation). [SCAPCA Regulation I, Section 6.03.C & 6.03.D, 3/4/04 – STATE / LOCAL ONLY]

MRRR: No monitoring is required. As with all permit terms, SRSWS must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition 122: To minimize odor, fugitive emissions and to maintain a negative pressure in the tipping area, combustion air shall be withdrawn from the tipping area, or an equivalent means of odor and fugitive emissions control acceptable to SCAPCA shall be used. [WAC 173-434-160(4), 12/22/03] [PSD-88-1B, Condition 28 & 22, 9/1/89 as revised on 2/9/96] [NOC #170, Condition C.10, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06]

MRRR: The permittee is required to investigate any complaints that it may receive regarding odors. If problems are found corrective action must be taken. Records of each complaint received, along with the results of the subsequent investigation, must be kept. [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

While not a part of the required MRRR for this requirement, the operation and maintenance plan (see Condition 57 above) will also add assurance that this requirement will be met, as it contains proper operating procedures for the facility.

Condition 123: The tipping area shall be designed and maintained to prevent outflow from the area to ambient air. [PSD-88-1B, Condition 22, 9/1/89 as revised on 2/9/96]

MRRR: The permittee is required to investigate any complaints that it may receive regarding odors or emissions from the tipping floor. If problems are found corrective action must be taken. Records of each complaint received, along with the results of the subsequent investigation, must be kept. [WAC 173-401-615(1) & (2), 9/16/02] Note: At least a portion of this MRRR is gapfilling.

While not a part of the required MRRR for this requirement, the operation and maintenance plan (see Condition 57 above) will also add assurance that this requirement will be met, as it contains proper operating procedures for the facility.

Condition 124: The boiler baghouses shall have maximum effective air to cloth ratios of 4.0:1.0 (Net - one module off-line for maintenance) and shall be equipped with an automatic cleaning mechanism. [PSD-88-1B, Condition 17, 9/1/89 as revised on 2/9/96] [NOC #170, Condition D.8, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06]

MRRR: No monitoring is required. As with all permit terms, SRSWS must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

STREAMLINED REQUIREMENTS

SRSWS has asked that SCAPCA streamline a number of requirements that apply to the facility. Streamlining means a number of similar, applicable requirements (e.g., particulate matter emission limits that are in different units of measure or differ in other ways) are replaced by a single requirement that is at least as stringent as each of the underlying requirements. In some cases the streamlined condition will simply incorporate the most stringent of the underlying requirements. In other cases, the streamlined condition may be a hybrid of the underlying requirements to ensure that it is at least as stringent as all of these requirements. By streamlining, similar conditions can be condensed into a single condition, thereby reducing the complexity of the permit and improving its implementation. EPA has written guidance, "White Paper 2 for Improved Implementation of the Part 70 Operating Permits Program" [as distributed under memorandum from Lydia N. Wegman, March 5, 1996]. The guidance states that "In cases where compliance with a single set of requirements effectively assures compliance with all requirements, compliance with all elements of each of the overlapping requirements may be unnecessary and could needlessly consume resources."

All of the streamlined conditions in the SRSWS's draft permit are contained in Section III. **STREAMLINED REQUIREMENTS.** At the end of each condition, the underlying requirements for that condition are listed.

As stated in EPA's guidance, failure to meet the streamlined condition is a violation of the permit, but is not necessarily a violation of all of the underlying requirements. If a violation of a streamlined condition occurs, the underlying requirements must be reviewed to determine which, if any, have also been violated.

EPA's guidance requires that the following must be considered when making stringency determinations, regarding applicable requirements.

- emission limit formats (emission limits in different forms must be converted to a common format and/or units of measure, or a correlation established between the different formats, prior to comparisons);
- effective dates of compliance;
- transfer or collection efficiencies;
- averaging times (however, in no event may requirements which are specifically designed to address a particular health concern be subsumed into a requirement that is any less protective); and
- test methods prescribed in the applicable requirements.

In the case of SRSWS's facility, the issue of compliance dates need not be considered because there are no known requirements that have a future compliance date. In addition, the issue of collection efficiencies is not relevant to any of the streamlining that is being proposed. The following discussion will focus on the remaining considerations that must be taken into account when developing streamlined conditions (i.e., limit formats, averaging times, and test methods, as applicable). Copies of the underlying requirements are included in Appendix A of this document.

Streamlined condition 1S – Operation and Maintenance

This is a streamlined condition for underlying requirements addressing operation and maintenance at

the facility. The condition reads as follows:

1S. Operation and Maintenance. The permittee shall meet the following operation and maintenance requirements:

- a. The permittee shall follow the SCAPCA approved site-specific operation manual, dated October 2005, or a subsequent SCAPCA approved version. The operating manual shall include, at a minimum:
 - i. a summary of applicable requirements under this permit;
 - ii. a description of basic combustion theory applicable to a MWC;
 - iii. procedures for receiving, handling, and feeding municipal solid waste;
 - iv. procedures for MWC startup, shutdown, and malfunction, including procedures for responding to periodic upset or off-specification conditions. These procedures shall specify the conditions that will initiate MWC shutdown, the expected time for completion of the process and a step-by-step description of what will occur. The procedures shall be followed during all MWC operations;
 - v. procedures for maintaining proper combustion air supply levels;
 - vi. procedures for operating the MWC within the standards of this permit;
 - vii. procedures for minimizing particulate matter carryover;
 - viii. procedures for handling ash, including a summary of the requirements in Condition 2S below and procedures for ensuring that these requirements are met;
 - ix. procedures for monitoring MWC emissions;
 - x. a program for keeping normally traveled roadways free of visible dust;
 - xi. procedures for recording and investigating complaints received;
 - xii. procedures to ensure scheduling and completing of routine maintenance activities, required to keep air pollution control equipment, and other equipment that has the potential to affect emissions, in proper operating condition;
 - xiii. a description of recordkeeping procedures for maintenance activities; and
 - xiv. other reporting and recordkeeping procedures.
- b. The permittee shall establish a training program to review the operating manual, with each person who has responsibilities affecting the operation of the MWCs, including chief facility operators, shift supervisors, control room operators, ash handlers, maintenance personnel, and crane/load handlers, according to the following schedule:
 - i. initial review shall occur prior to the day when the person assumes responsibilities affecting MWC operation; and
 - ii. additional reviews shall occur annually.
- c. The operating manual shall be kept in a readily accessible location for all persons required to undergo training (see b. above). The operating manual and records shall be available for

inspection by SCAPCA upon request.

d. The operating manual shall be updated annually. The annual updates shall be submitted to SCAPCA for approval within 7 days of completion.

Emissions that result from failure to follow the requirements of the plan may be considered proof that the equipment was not being properly operated and maintained.

[Streamlined condition for the following requirements: 40 CFR § 60.54b(e), (f) & (g) as in effect on 9/1/98 as adopted by reference with minor changes in SCAPCA Regulation I, Section 6.17.F, 1/13/99; PSD-88-1B, Condition 18, 25, 26(a), & 31, 9/1/89 as revised on 2/9/96; NOC #170, Conditions D.5, D.12, & G.2, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06; WAC 173-434-090, 9/17/90; WAC 173-434-160(4)(the first sentence), 12/22/03; and 40 CFR § 60.11(d), 1996 as adopted by reference in WAC 173-400-115, 1/10/05]

The following is a discussion of the underlying requirements that are being streamlined and how compliance with the streamlined condition should assure compliance with the underlying requirement (i.e., that the streamlined condition is at least as stringent as the underlying requirement):

1. 40 CFR § 60.54b(e), (f) & (g) as adopted by reference with minor changes in SCAPCA Regulation I, Section 6.17.F, 1/13/99
 - All requirements are specifically included in the streamlined condition.
2. PSD-88-1B, Condition 18, 9/1/89 as revised on 2/9/96
 - This requirement is incorporated directly into the streamlined condition.
3. PSD-88-1B, Condition 25, 9/1/89 as revised on 2/9/96
 - The streamlined condition creates a hybrid requirement where the procedures, used to ensure that equipment affecting emissions is properly maintained, must be included in the operation and maintenance manual. Because the facility must also implement these procedures, it is at least as stringent as the underlying requirement.
4. PSD-88-1B, Condition 26(a), 9/1/89 as revised on 2/9/96
 - This requirement is not enforceable as a practical matter. In addition, it removes any kind of flexibility for the permittee to improve operations (or even make small, minor changes), if such improvements would be contrary to information that was contained in the PSD application, without first receiving approval from Ecology. The proposed streamlined condition is believed to be at least as stringent and more enforceable, as a practical matter, than the underlying condition. The streamlined condition assures that employees are aware of the requirements of the air operating permit and emphasizes those portions of the PSD application that were important enough to include as conditions of approval in the PSD permit.
5. PSD-88-1B, Condition 31, 9/1/89 as revised on 2/9/96
 - This requirement prohibits any activity that is inconsistent with the PSD application and approval. In and of itself, Condition 31 is not enforceable as a practical matter. If the facility is complying with the terms of the air operating permit, and specifically with its operation and

maintenance manual, it should be meeting this condition. The streamlined condition is enforceable as a practical matter and is therefore at least as stringent as Condition 31 of the PSD approval.

6. NOC #170, Condition D.5, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06;
 - This requirement is incorporated into the streamlined condition.
7. NOC #170, Condition D.12, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06;
 - This requirement is incorporated into the streamlined condition except that the same comments for PSD Condition 25 (4. above) apply to the portion that requires O&M manuals for equipment affecting emissions.
8. NOC #170, Condition G.2, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06;
 - This is a general duty requirement. By implementing the O&M manual and meeting the requirements of the operating permit, the permittee will be meeting the general duty obligation.
9. WAC 173-434-090, 9/17/90;
 - The streamlined condition incorporates the requirements of WAC 173-434-090. The streamlined condition is more stringent, in that it requires annual updates of the manual, versus the biennial updates required in WAC 173-434-090.
10. WAC 173-434-160(4) (the first sentence), 12/22/03
 - The streamlined condition is a practical method by which the general obligation to maintain and operate the facility properly is achieved. If the permittee complies with the streamlined O&M requirement, it should comply with this underlying requirement.
11. 40 CFR § 60.11(d), 1996 as adopted by reference in WAC 173-400-115, 1/10/05 and in WAC 173-434-110, 12/22/03
 - The streamlined condition is a practical method by which the general obligation to maintain and operate the facility properly can be achieved. If the permittee complies with the streamlined O&M requirement, it should comply with this underlying requirement.

Streamlined condition 2S – Ash Handling and Transport

This is a streamlined condition for underlying requirements, addressing ash handling and transport at the facility. The condition reads as follows:

2S. Ash Handling and Transport. The permittee shall meet the following ash handling and transport requirements:

- a. Residue from the grates, grate siftings, ash from the combustors, economizers, superheaters, flyash from the spray dry absorber, and fabric filter hoppers shall be thoroughly wetted or treated to prevent fugitive emissions, prior to further handling;
- b. Solid material shall not leave the quench tanks in a dry condition that creates dust;
- c. The ash/residue in the storage building must remain sufficiently moist to prevent dust during

storage and handling operations;

d. Ash and residue, transported from the ash residue storage building, shall be transported only in covered trucks or containers. The covers must be in place for the return trip to the facility. The exterior of the trucks and containers, used to transport the ash, must be inspected and, if necessary, cleaned before leaving the ash storage facility. Cleaning must be done by water spray or an alternative method, approved by Ecology;

e. Excess water from the covered ash trucks shall be controlled, using a method submitted to and approved by Ecology, prior to leaving the site to prevent spillage of excess water onto the public right of way;

f. The ash truck loading area shall be enclosed at all times, except when a person or vehicle is entering or leaving;

g. All conveyors and chutes for dry fly ash and dry bottom ash shall be totally enclosed and dust-tight. Dry ash shall be stored inside buildings or other enclosures to prevent entrainment into the outside air; and

h. Except as otherwise allowed in i. and ii. below, emissions of combustion ash from an ash conveying system (including conveyor transfer points) shall not be visible in excess of 5 percent of the observation period (e.g., 9 minutes per 3-hour period), as determined by RM 22 observations.

i. This limit does not cover visible emissions discharged inside buildings or enclosures of ash conveying systems; however, the emissions limit specified does cover visible emissions discharged to the atmosphere from buildings or enclosures of ash conveying systems.

ii. This limit does not apply during maintenance and repair of ash conveying systems.

[Streamlined condition for the following requirements: 40 CFR § 60.55b as adopted by reference in SCAPCA Regulation I, Section 6.17.G, 1/13/99; PSD-88-1B, Conditions 19, & 20, 9/1/89 as revised on 2/9/96; and NOC #170, Conditions C.2, C.3, C.4, C.6, C.7, & C.9, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06]

The following is a discussion of the underlying requirements that are being streamlined and how compliance with the streamlined condition should assure compliance with the underlying requirement (i.e., that the streamlined condition is at least as stringent as the underlying requirement):

1. PSD-88-1B, Conditions 19, 9/1/89 as revised on 2/9/96
 - This requirement is incorporated into the streamlined condition.
2. PSD-88-1B, Condition 20, 9/1/89 as revised on 2/9/96
 - This requirement is incorporated into the streamlined condition.

3. NOC #170, Condition C.2, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06
 - This requirement is incorporated into the streamlined condition.
4. NOC #170, Condition C.3, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06
 - This requirement is incorporated into the streamlined condition.
5. NOC #170, Condition C.4, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06
 - This requirement is incorporated into the streamlined condition.
6. NOC #170, Condition C.6, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06
 - This requirement is incorporated into the streamlined condition.
7. NOC #170, Condition C.7, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06
 - This requirement is incorporated into the streamlined condition.
8. NOC #170, Condition C.9, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06
 - This requirement is incorporated into the streamlined condition.
9. 40 CFR § 60.55b as adopted by reference in SCAPCA Regulation I, Section 6.17.G, 1/13/99
 - This requirement is incorporated into the streamlined condition.

Streamlined condition 3S – General Opacity Limit

This is a streamlined condition for underlying requirements, addressing opacity limits for those units other than the MWCs. The streamlined condition reads as follows:

3S. General Opacity Limit. Visible emissions from any emission unit, except for the MWCs, shall not exceed 20% for an aggregate of more than three minutes, in any one hour, except as otherwise allowed in WAC 173-400-040(1), as determined using ECOLOGY Method 9A (July 12, 1990). In addition, except for the MWCs, visible emissions from any emission unit shall not be greater than 0% for more than six minutes in any one-hour period, as determined using RM 22. (See Condition 5S for the opacity limit that applies to the MWCs.)

[Streamlined condition for the following requirements: WAC 173-400-040(1), 173-400-040(1)(a), & 173-400-040(1)(b), 1/10/05(8/20/93) and WAC 173-434-130(4)(c), 12/22/03]

The following is a discussion of the underlying requirements that are being streamlined and how compliance with the streamlined condition should assure compliance with the underlying requirement (i.e., that the streamlined condition is at least as stringent as the underlying requirement):

1. WAC 173-400-040(1), 173-400-040(1)(a), & 173-400-040(1)(b), 1/10/05(8/20/93)
 - This requirement is incorporated into the streamlined condition.
2. WAC 173-434-130(4)(c), 12/22/03
 - This requirement is very difficult to interpret and enforce. It reads, “The opacity as measured visually shall not exceed an average of zero percent from any emissions unit except

incinerator stacks for more than six consecutive minutes in any sixty minute period.” The best interpretation of this requirement seems to be that visible emissions are allowed, as long as the emissions do not persist for more than six consecutive minutes. The streamlined condition is more stringent, in that the total time in any one-hour period that visible emissions are observed cannot exceed six minutes. For example, if visible emissions are observed for 5 minutes, then no visible emissions for 2 minutes, and then visible emissions for another 4 minutes. This would not be a violation of WAC 173-434-130(4)(c). It would be a violation of the streamlined condition.

Streamlined condition 4S – MWC Particulate Matter Limit

This is a streamlined condition for underlying requirements, addressing particulate matter emission limits for the two MWCs. The streamlined condition reads as follows:

4S. MWC Particulate Matter Limit. Emissions from each MWC shall not exceed the following:

- a. Total particulate matter emissions, as measured using EPA Reference 5, including front and back half analysis, but excluding sulfates, chlorides, and ammonium salts, shall not exceed 34 tons per year;
- b. Total particulate matter emissions, as measured using RM 5, front half only, shall not exceed 27 mg/dscm, corrected to 7% oxygen; and
- c. Total particulate matter emissions, as measured using EPA Reference 5, including front and back half analysis, but excluding sulfates, chlorides, and ammonium salts, shall not exceed 0.020 gr/dscf, corrected to 7% oxygen.

[Streamlined condition for the MWCs for the following requirements as they apply to these units: SCAPCA Regulation I, Section 6.17.D.1, 1/13/99; PSD-88-1B, Condition 1 & 2, 9/1/89 as revised on 2/9/96; PM and PM10 emission limits in NOC #170, Condition A.1, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06; 40 CFR § 60.43b(d)(1) as adopted by reference in WAC 173-400-115, 10/23/98; 40 CFR § 60.52(a) as adopted by reference in WAC 173-400-115, 1/10/05; WAC 173-434-130(1)(a), 12/22/03; WAC 173-400-050(1) & (3), 1/10/05(3/22/91)* - see note on page 5 (exception in (3) is STATE/LOCAL ONLY]

The streamlined condition is a hybrid of the underlying requirements. The following is a discussion of how compliance with the streamlined condition should assure compliance with each underlying requirement (i.e., that the streamlined condition is at least as stringent as the underlying requirement):

1. SCAPCA Regulation I, Section 6.17.D.1, 1/13/99
 - This requirement, total particulate matter emissions, as measured using RM 5, front half only, shall not exceed 27 mg/dscm, corrected to 7% oxygen; is incorporated into the streamlined condition.
2. PSD-88-1B, Condition 1, 9/1/89 as revised on 2/9/96
 - This requirement, particulate emissions from each MWC shall not exceed 0.020 gr/dscf, corrected to 7% O₂ or 34 tons per year, as measured by EPA Method 5, is incorporated into

the streamlined condition.

3. PSD-88-1B, Condition 2, 9/1/89 as revised on 2/9/96

- PSD-88-1B, Condition 2 establishes a PM10 limit with PM10 measured using ECOLOGY Method 19. The standard consists of a concentration of 0.015 gr/dscf and an annual limit of 23 tons per year. State Method 19 measures front half emissions only (i.e., it does not measure condensibles). Because PM10 is a fraction of total PM and because, the total front half PM limit in 4S.b is more stringent than the 0.015 gr/dscf limit (0.015 gr/dscf corresponds to 34 mg/dscm), compliance with 4S.b will assure compliance with the PM10 grainloading standard as well. In addition, based on emissions of 27 mg/dscm, maximum annual PM10 emissions would be 21.2 tons, which is also more stringent than the annual PM10 limit of 23 tons.

4. NOC #170, Condition A.1, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06

- NOC #170, Condition A.1 contains a particulate limit of 0.020 gr/dscf, corrected to 7% O₂, as measured by EPA Method 5, including back half catch, excluding sulfates, chlorides, and ammonium salts. This particulate limit is incorporated into the streamlined condition.

Condition A.1 also contains a PM10 limit of 0.015 gr/dscf, corrected to 7% O₂, as measured by Ecology Method 19. As discussed in 3. above, because PM10 is a fraction of total PM and because the total front half PM limit in 4S.b is more stringent than the 0.015 gr/dscf limit (0.015 gr/dscf corresponds to 34 mg/dscm), compliance with 4S.b will assure compliance with the PM10 grain loading standard as well.

5. 40 CFR § 60.43b(d)(1) as adopted by reference in WAC 173-400-115, 10/23/98 and in WAC 173-434-110, 9/17/90

- This requirement, 0.1 pounds particulate per MMBTU, given in 40 CFR 60, Subpart Db, "Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units," uses the same test method as the particulate matter emission limit in 4S.c above. The 0.1 pounds particulate per MMBTU limit corresponds to 111 mg/dscm, corrected to 7% oxygen, so the emission limit of 27 mg/dscm in 4S.b is clearly more stringent.

6. 40 CFR § 60.52(a) as adopted by reference in WAC 173-400-115, 10/23/98 and in WAC 173-434-110, 9/17/90

- This requirement, 0.18 g/dscm (0.08 gr/dscf), corrected to 12% CO₂, given in 40 CFR 60, Subpart E, "Standards of Performance for Incinerators," uses the same test method as the particulate matter emission limit in 4S.c above. The 0.08 gr/dscf limit corresponds to 196 mg/dscm, corrected to 7% oxygen, so the emission limit of 27 mg/dscm in 4S.c is clearly more stringent.

7. WAC 173-434-130(1)(a), 9/17/90

- This requirement, 0.020 gr/dscf particulate, corrected to 7% O₂, is incorporated into the streamlined condition.

8. WAC 173-400-050(1) & (3), 2/19/91

- WAC 173-400-050(1) states that the test method is EPA Method 5 or an approved procedure

contained in the state of Washington test manual. The 0.1 gr/dscf limit corresponds to 229 mg/dscm, corrected to 7% oxygen. The emission limits of 27 mg/dscm in 4S.c and 0.020 gr/dscf in 4S.d are clearly more stringent.

Streamlined condition 5S – MWC Opacity Limit

This is a streamlined condition for underlying requirements addressing the opacity limit for the two MWCs. The streamlined condition reads as follows:

5S. MWC Opacity Limit. Opacity from each MWC shall:

- a. Be less than or equal to 10%, six-minute average, as measured using a continuous opacity monitor, meeting the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1, and operated according to 40 CFR § 60.11;
- b. Be less than or equal to 5%, based on either a six-minute average or a six-minute aggregate, whichever is more stringent, as determined using RM 9 for the six-minute average, and Ecology Method 9B for the six-minute aggregate; and
- c. Be less than 20%, based on a three-minute aggregate, as determined using Ecology Method 9A.

[Streamlined condition for MWCs for the following requirements as they apply to these units: PSD-88-1B, Conditions 8 & 9, 9/1/89 as revised on 2/9/96; opacity limit in NOC #170, Condition A.1, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06; SCAPCA Regulation I, Section 6.17.D.2, 1/13/99; WAC 173-400-040(1), 8/20/93; WAC 173-434-130(4), 12/22/03; and SCAPCA Regulation I, Section 6.02, 1/13/99 – STATE/LOCAL ONLY]

The streamlined condition is a hybrid of the underlying requirements. The table below lists each underlying requirement that is being streamlined so that all the limits can be compared.

Underlying Requirement Citation	Underlying Opacity Requirement	Comparable Streamlined Opacity Requirement
PSD-88-1B, Condition 8, 9/1/89 as revised on 2/9/96 and NOC #170, Condition A.1, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06	10% 6-minute average Continuous opacity monitor	10% 6-minute average Continuous opacity monitor
PSD-88-1B, Condition 9, 9/1/89 as revised on 2/9/96	5% 6-minute average RM 9	5% 6-minute average RM 9
NOC #170, Condition A.1, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06	5% 6 minute aggregate Ecology Method 9B	5% 6 minute aggregate Ecology Method 9B
SCAPCA Regulation I, Section 6.17.D.2, 1/13/99	10% 6-minute average Continuous Opacity Monitor or RM 9	10% 6-minute average Continuous opacity monitor and

Underlying Requirement Citation	Underlying Opacity Requirement	Comparable Streamlined Opacity Requirement
		5% 6-minute average RM 9
WAC 173-400-040(1), 8/20/93	20% 3 minute aggregate in any one hour Ecology Method 9A	<20% 3 minute aggregate Ecology Method 9A
WAC 173-434-130(4), 12/22/03	5% six consecutive minutes Ecology Method 9A	5% six-minute aggregate Ecology Method 9A
SCAPCA Regulation I, Section 6.02, 1/13/99 – STATE/LOCAL ONLY	<20% 3 minute aggregate Ecology Method 9A	<20% 3 minute aggregate Ecology Method 9A

As can be seen from the table above, the proposed streamlined condition, limiting opacity from the MWCs, is at least as stringent as all of the underlying opacity standards.

Streamlined condition 6S – MWC Sulfur Dioxide Limit

This is a streamlined condition for underlying requirements, addressing the MWC sulfur dioxide (SO₂) emissions. The streamlined condition reads as follows:

6S. MWC Sulfur Dioxide Limit. Except during periods of startup or shutdown, based on a 24-hour geometric mean determined using RM 19, Section 4.3 and 5.4:

- During 95% of the operating time per month, controlled sulfur dioxide emissions from each MWC shall not exceed 25 ppm, corrected to 7% oxygen, or uncontrolled sulfur dioxide emissions from each MWC shall be reduced by at least 85% by weight, whichever is less stringent; and
- At all times, controlled sulfur dioxide emissions from each MWC shall not exceed 29 ppm, corrected to 7% oxygen, or uncontrolled sulfur dioxide emissions from each MWC shall be reduced by at least 80% by weight, whichever is less stringent.

Periods of startup and shutdown are limited to 3 hours per occurrence.

SO₂ emissions shall be measured, using a continuous emissions monitor system designed, installed, and operated to meet the requirements in 40 CFR Part 60, Appendix B (Performance Specification 2) and Appendix F and in SCAPCA Regulation I, Section 6.17.H. The 24-hour daily geometric means shall be determined, using RM 19, Section 4.3 and 5.4.

[Streamlined condition for MWCs for the following requirements, as they apply to these units: PSD-88-1B, Condition 3, 9/1/89 as revised on 2/9/96; the sulfur dioxide emission limit in NOC #170, Condition A.1, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06; SCAPCA Order #93-06, 8/27/93; SCAPCA Regulation I, Section 6.17.D.6, 1/13/99; WAC 173-400-040(6), 1/10/05(8/20/93)* - see note on page 5; and WAC 173-434-130(3), 12/22/03]

The following is a discussion of the underlying requirements that are being streamlined and how

compliance with the streamlined condition should assure compliance with the underlying requirement (i.e., that the streamlined condition is at least as stringent as the underlying requirement):

1. PSD-88-1B, Condition 3, 9/1/89 as revised on 2/9/96

- The numerical limit in the sulfur dioxide streamlined condition (i.e., 29 ppm, corrected to 7% O₂) is more stringent than the limit in Condition 3 of the PSD permit. The PSD limit is 50 ppm, corrected to 7% oxygen, or 80% reduction. The PSD condition does not specify an averaging time when determining compliance using a continuous emission monitor. Historically, compliance with the limit has been determined on a 24-hour geometric mean, which is the same averaging time used in the streamlined condition.

2. The sulfur dioxide emission limit in NOC #170, Condition A.1, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06

- The numerical limit in the sulfur dioxide streamlined condition (i.e., 29 ppm, corrected to 7% O₂) is more stringent than the limit in Condition A.1 of the NOC approval. The NOC limit is 50 ppm, corrected to 7% oxygen, or 80% reduction. The NOC condition specifies a 1-hour average, which was meant to represent best available control technology (BACT). However, after the facility began operating, SCAPCA reviewed the BACT requirement and made a determination in SCAPCA Order #93-06. In this order, which went through the same public process as for a NOC approval, a new SO₂ BACT limit was set. The limit reduced the numerical limit, but increased the averaging time. The order's limit uses a 24-hour geometric limit, consistent with requirements under federal rules regulating MWCs. As a BACT determination, the limit in the order has been determined to be equivalent to the BACT limit in the NOC. As such, the proposed streamlined limit, which is more stringent than the limit in SCAPCA Order #93-06 (see the discussion in 3 below), should be at least as stringent as the SO₂ limit in NOC #170.

3. SCAPCA Order #93-06, 8/27/93

- Both the proposed streamlined condition for SO₂ and the SCAPCA Order limit are two-tiered (i.e., there is a limit that must be met at least 95% of the operating time in any month and a second limit that must never be exceeded). The limit that must be met for at least 95% of the operating time (i.e., 25 ppm or 85% reduction) is the same for both the streamlined condition and the order. The streamlined "never to exceed" limit is lower than the "never to exceed" limit in the order. The streamlined "never to exceed" limit is 29 ppm (or 80% reduction), and the order limit is 30 ppm (or 80% reduction), corrected to 7% oxygen, respectively. The streamlined condition is at least as stringent as the limits in the order.

4. SCAPCA Regulation I, Section 6.17.D.6, 1/13/99; WAC 173-400-040(6), 8/20/93

- The SO₂ limit in the streamlined condition and in SCAPCA Regulation I, Section 6.17.D.6 have the same averaging time. The "never to be exceeded" limit in the streamlined SO₂ condition is 29 ppm (or 80% reduction) while the limit in SCAPCA Regulation I, Section 6.17.D.6 is 29 ppm (or 75% reduction). The streamlined condition is at least as stringent as the limit in Section 6.17.D.6.

5. WAC 173-400-040(6), 8/20/93

- The emission limit in WAC 173-400-040(6) is 1000 ppm (1-hour average). While it can be

demonstrated, using theoretical information, that the 1000 ppm limit can be exceeded for one hour without exceeding the streamlined condition, even uncontrolled emissions from the MWC are less than the 1000 ppm limit. Compliance with the streamlined condition, in conjunction with compliance with 1S – Operation and Maintenance, which requires proper operation and maintenance of the air pollution control equipment, will be at least as stringent as the SO₂ emission limit in WAC 173-400-040(6).

6. WAC 173-434-130(3), 12/22/03

- The numerical limit in the sulfur dioxide streamlined condition is more stringent than the limit in WAC 173-434-130(3). The alternate reduction limits are the same, 80% removal. The WAC 173-434 numerical limit is 50 ppm corrected to 7% oxygen. WAC 173-434-130(3) specifies a 1-hour average for the concentration limit. No averaging time is specified for the reduction limit and the rule allows for approval of a method to determine the percent reduction. After the facility began operating, SCAPCA reviewed the BACT requirement and the percent reduction requirement and made a determination in SCAPCA Order #93-06. In this order, a new SO₂ limit was set. The new limit reduced the allowable concentration, but increased the averaging time. The order's limit uses a 24-hour geometric limit, consistent with requirements under federal rules regulating MWC. As a BACT determination, the limit in the order has been determined to be equivalent to the limit in WAC 173-434-130(3) (see introductory language in Order #93-06). As such, the proposed streamlined condition, which is more stringent than the limit in SCAPCA Order #93-06 (see the discussion in 3. above), is at least as stringent as the limit in WAC 173-434-130(3) as well.

Streamlined condition 7S – MWC Hydrogen Chloride Limit

This is a streamlined condition for underlying requirements, addressing the MWC hydrogen chloride (HCl) emissions. The streamlined condition reads as follows:

7S. MWC Hydrogen Chloride Limit. Hydrogen chloride (HCl) emissions from each MWC shall not exceed 29 ppm, corrected to 7% oxygen, or 95% reduction, whichever is less stringent, as measured by RM 26 or 26A.

[Streamlined condition for MWCs for the following requirements as they apply to these units: the hydrogen chloride emission limits (see Condition 6M for continuous emission monitoring requirement) in PSD-88-1B, Condition 4 (the first sentence), 9/1/89 as revised on 2/9/96; the hydrogen chloride emission limit in NOC #170, Condition A.1, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06; SCAPCA Regulation I, Section 6.17.D.7, 1/13/99; and WAC 173-434-130(2), 12/22/03]

The following is a discussion of the underlying requirements that are being streamlined and how compliance with the streamlined condition should assure compliance with the underlying requirement (i.e., that the streamlined condition is at least as stringent as the underlying requirement):

1. The hydrogen chloride emission limit in PSD-88-1B, Condition 4 (the first sentence), 9/1/89 as revised on 2/9/96

- The streamlined limit for HCl is clearly more stringent than the limit in Condition 4 of the PSD permit. The PSD limit is 50 ppm or 80% reduction, whereas the streamlined limit is 29 ppm or

95% reduction. The test method in the PSD is not established, but requires Ecology approval. Historically, testing for HCl has been done, using the same methods as specified in the streamlined condition (i.e., RM 26 or 26A).

2. The hydrogen chloride emission limit in NOC #170, Condition A.1, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06
 - The streamlined limit for HCl is clearly more stringent than the HCl limit in Condition A.1 of the NOC approval. The NOC limit is 50 ppm or 90% reduction, whereas the streamlined limit is 29 ppm or 95% reduction. The test method in the NOC is not established, but requires SCAPCA approval. Historically, testing for HCl has been done, using the same methods as specified in the streamlined condition (i.e., RM 26 or 26A).
3. SCAPCA Regulation I, Section 6.17.D.7, 1/13/99
 - The streamlined emission limit incorporates the emission limit found in SCAPCA Regulation I, Section 6.17.D.7.
4. WAC 173-434-130(2), 9/17/90
 - The streamlined limit for HCl is clearly more stringent than the limit in WAC 173-434-130(2). The 173-434 limit is 50 ppm or 80% reduction, whereas the streamlined limit is 29 ppm or 95% reduction. The test method in WAC 173-434-130(2) is the same as the streamlined condition (i.e., the test method(s) found in 40 CFR Part 60, Appendix A).

Streamlined condition 8S – MWC Oxides of Nitrogen Limit

This is a streamlined condition for underlying requirements, addressing the MWC oxides of nitrogen (NO_x) emissions. The streamlined condition reads as follows:

8S. MWC Oxides of Nitrogen Limit. Except during periods of startup and shutdown, oxides of nitrogen (NO_x) emissions from each MWC shall not exceed:

- a. 165 ppm, corrected to 7% oxygen, 8-hour rolling average, as measured using a continuous emissions monitor system designed, installed, and operated to meet the requirements in 40 CFR Part 60, Appendix B (Performance Specification 2) and Appendix F and in SCAPCA Regulation I, Section 6.17.H;
- c. 225 ppm, corrected to 7% oxygen, 3-hour rolling average, as measured using a continuous emissions monitor system designed, installed, and operated to meet the requirements in 40 CFR Part 60, Appendix B (Performance Specification 2) and Appendix F and in SCAPCA Regulation I, Section 6.17.H; and
- c. 184 tons per year.

Periods of startup and shutdown are limited to 3 hours per occurrence.

[Streamlined condition for MWCs for the following requirements as they apply to these units: PSD-88-1B, Condition 5, 9/1/89 as revised on 2/9/96; the oxides of nitrogen emission limit in NOC #170, Condition A.1, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06; and SCAPCA Regulation I,

Section 6.17.D.9, 1/13/99]

The following is a discussion of the underlying requirements that are being streamlined and how compliance with the streamlined condition should assure compliance with the underlying requirement (i.e., that the streamlined condition is at least as stringent as the underlying requirement):

1. PSD-88-1B, Condition 5, 9/1/89 as revised on 2/9/96
 - The streamlined emission limit incorporates the PSD emission limit. It should be noted that although Condition 5 of the PSD permit allows Ecology to set an alternate NOx limit, this has not been done, so the 165 ppm limit in Condition 5 is the applicable limit.
2. The oxides of nitrogen emission limit in NOC #170, Condition A.1, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06
 - The streamlined condition incorporates this limit.
3. SCAPCA Regulation I, Section 6.17.D.9, 1/13/99
 - The proposed streamlined limit is clearly more stringent than the limit in SCAPCA Regulation I, Section 6.17.D.9. The Section 6.17 limit is 205 ppm (24-hour daily arithmetic average), whereas the streamlined line is 165 ppm (8-hour rolling average). Both are corrected to 7% oxygen. In addition, the averaging time for the streamlined limit is shorter, 8-hour versus 24-hour, which also makes it more stringent.

Streamlined condition 9S – MWC Carbon Monoxide Limit

This is a streamlined condition for underlying requirements, addressing the MWC carbon monoxide emissions. The streamlined condition reads as follows:

9S. MWC Carbon Monoxide Limit. Except during periods of startup and shutdown, carbon monoxide (CO) emissions from each MWC shall not exceed:

- a. 100 ppm, corrected to 7% oxygen, 8-hour rolling average, as measured using a continuous emissions monitor system designed, installed, and operated to meet the requirements in 40 CFR Part 60, Appendix B (Performance Specification 4) and Appendix F and in SCAPCA Regulation I, Section 6.17.H; and
- b. 100 ppm, corrected to 7% oxygen, 4-hour block average, as measured using a continuous emissions monitor system designed, installed and operated to meet the requirements in 40 CFR Part 60, Appendix B (Performance Specification 4) and Appendix F and in SCAPCA Regulation I, Section 6.17.H.

Periods of startup and shutdown are limited to 3 hours per occurrence.

[Streamlined condition for MWCs for the following requirements as they apply to these units: the carbon monoxide emission limit (see Condition 6M for continuous emission monitoring requirement) in PSD-88-1B, Condition 6 (the first sentence), 9/1/89 as revised on 2/9/96; the carbon monoxide emission limit in NOC #170, Condition A.1, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06; SCAPCA Regulation I, Section 6.17.D.10, 1/13/99; WAC 173-400-050(2) (carbonyl emission standard

in the first sentence), 1/10/05(2/19/91)* - see note on page 5; and WAC 173-434-160(1)(c) (excess air requirement), 12/22/03]

The following is a discussion of the underlying requirements that are being streamlined and how compliance with the streamlined condition should assure compliance with the underlying requirement (i.e., that the streamlined condition is at least as stringent as the underlying requirement):

1. The carbon monoxide emission limit in PSD-88-1B, Condition 6 (the first sentence), 9/1/89 as revised on 2/9/96
 - The streamlined emission limit has the same numerical value as the PSD condition. However, the combination of averaging times in the streamlined condition (i.e., 4-hour block and 8-hour rolling) are more stringent than the PSD condition (i.e., 8-hour rolling average and a 24-hour average). The annual limit in the PSD condition (i.e., 86 tons/year CO) is not included in the streamlined condition because the annual potential emissions calculated using the limit of 100 ppm, maximum boiler firing rate of 183.3 MMBTU/hr, and 100% annual availability is less than 86 tons/year. Therefore, compliance with the annual limit can be demonstrated by complying with the 100 ppm limit.
2. The carbon monoxide emission limit in NOC #170, Condition A.1, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06
 - The streamlined emission limit incorporates the NOC emission limit.
3. SCAPCA Regulation I, Section 6.17.D.10, 1/13/99
 - The streamlined emission limit incorporates the emission limit found in SCAPCA Regulation I, Section 6.17.D.10.
4. The carbonyl emission standard in WAC 173-400-050(2) (the first sentence), 1/10/05 (2/19/91)
 - WAC 173-400-050 states "For any incinerator, no person shall cause or allow emissions in excess of one hundred ppm of total carbonyls as measured by Source Test Method 14 procedures contained in "*Source Test Manual - Procedures for Compliance Testing*," state of Washington, department of ecology, as of July 12, 1990, on file at ecology." The carbonyl standard is a relatively old standard that is in place as a measure of complete combustion in an incinerator. With the advent of continuous emission monitoring for carbon monoxide, which is a better method of determining whether complete combustion is occurring, the carbonyl standard is outdated. Continuous emission monitoring of carbon monoxide is a more stringent standard, especially when considering that emissions are being measured 24 hours per day, and not just once a year during a stack test.
5. WAC 173-434-160(1)(c) (excess air requirement), 12/22/03
 - WAC 173-434-160(1)(c) requires that the combustion gases leaving the final combustion zone must contain at least 3% oxygen, measured on a wet basis. The 3% oxygen, measured on a wet basis, corresponds to about 4%, measured on a dry basis. The facility operates at oxygen levels in the 9 to 11% range. At levels below this, the carbon monoxide emissions increase dramatically to levels above the CO emission standards. As such, the carbon monoxide streamlined condition is being proposed as a surrogate for the excess air requirement, as measured by the wet oxygen levels. The streamlined carbon monoxide emission limit is more

stringent in that the emissions would rise above this limit well before oxygen levels would fall below the 3% oxygen level.

Streamlined condition 10S – MWC Lead Limit

This is a streamlined condition for underlying requirements, addressing the MWC lead emissions. The streamlined condition reads as follows:

10S. MWC Lead Limit. Lead emissions from each MWC shall not exceed 0.44 mg/dscm, corrected to 7% oxygen, as measured by RM 29. This standard shall apply at all times except during periods of startup, shutdown, or malfunction. Duration of startup, shutdown, and malfunction periods are limited to 3 hours per occurrence.

[Streamlined condition for MWCs for the following requirements as they apply to these units: the lead emission limit in NOC #170, Condition A.1, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06 and SCAPCA Regulation I, Section 6.17.D.4, 1/13/99]

The following is a discussion of the underlying requirements that are being streamlined and how compliance with the streamlined condition should assure compliance with the underlying requirement (i.e., that the streamlined condition is at least as stringent as the underlying requirement):

1. The lead emission limit in NOC #170, Condition A.1, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98 & 8/8/06
 - The lead emission limit of 0.001 gr/dscf corresponds to 2.29 mg/dscm, both corrected to 7% oxygen. Considering that the two test methods, used for the streamlined condition and the NOC requirement, are similar (both use Method 5 sampling techniques, similar impinger contents, and similar analytical methods) and should yield similar results, the streamlined condition of 0.44 mg/dscm, corrected to 7% oxygen, is clearly more stringent.
2. SCAPCA Regulation I, Section 6.17.D.4, 1/13/99
 - This requirement is incorporated into the streamlined condition.

Streamlined condition 11S – MWC Combustion Temperature & Residence Time Limits

This is a streamlined condition for underlying requirements, addressing the MWC baghouse combustion temperature and residence time. The streamlined condition reads as follows:

- 11S. MWC Combustion Temperature & Residence Time Limits.** Whenever solid waste is burned,
- a. A combustion gas retention time of at least one second shall be maintained in the combustion zone at a minimum temperature of 1800°F; and
 - b. The final combustion zone temperature of the MWC shall not be below 1800°F for any 15-minute average, nor below 1600°F for any individual reading.

The superheater outlet temperature may be used as a surrogate measure of the final combustion zone temperature. In such case, the superheater outlet temperature shall not be less than 900°F, based on a 15-minute average.

An alternate temperature may be used as a surrogate measure of the final combustion temperature, provided that the following are met: the temperature is measured by a permanently installed thermocouple(s) or equivalent temperature sensing device; the method for determining the correlation between the proposed temperature and the final combustion temperature is approved by SCAPCA; a correlation with the final combustion temperature is established; and design specifications, showing the location of the sensing device, are submitted to and approved by SCAPCA prior to installation.

[Streamlined condition for MWCs for the following requirements as they apply to these units: NOC #170, Condition D.1, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06, per letter to P. Williams from SCAPCA, dated 4/27/94 and WAC 173-434-160(1)(a) & (b), 12/22/03]

The following is a discussion of the underlying requirements that are being streamlined and how compliance with the streamlined condition should assure compliance with the underlying requirement (i.e., that the streamlined condition is at least as stringent as the underlying requirement):

1. NOC #170, Condition D.1, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06
 - This requirement is incorporated into the streamlined condition. It should be noted that SCAPCA has approved the use of the superheater outlet temperature as a surrogate measure of the combustion temperature and established that at a superheater outlet temperature of 900°F, the minimum required combustion temperature of 1800°F is being met.
2. WAC 173-434-160(1) & (2), 12/22/03
 - This requirement is incorporated into the streamlined condition.

Streamlined condition 12S – MWC Baghouse Temperature Limit

This is a streamlined condition for underlying requirements, addressing the MWC baghouse inlet temperature. The streamlined condition reads as follows:

12S. MWC Baghouse Temperature Limit. The inlet temperature to each MWC baghouse shall not exceed the following:

- a. Except as otherwise allowed in SCAPCA Regulation I, Section 6.17.E, 17°C above the maximum demonstrated particulate matter control device temperature as determined by the procedures in SCAPCA Regulation I, Section 6.17.H, based on a 4-hour block average; and
- b. 300°F, based on a 1-hour block average, unless approved under Condition D.3 of NOC #170 and Condition 15 of PSD-88-1B.

[Streamlined condition for MWCs for the following requirements as they apply to these units: PSD-88-1B, Condition 15, 9/1/89 as revised on 2/9/96; NOC #170, Condition D.3, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06; 40 CFR § 60.53b(c) as adopted by reference in SCAPCA Regulation I, Section 6.17.E, 1/13/99; and WAC 173-434-160(3), 12/22/03]

The following is a discussion of the underlying requirements that are being streamlined and how compliance with the streamlined condition should assure compliance with the underlying requirement

(i.e., that the streamlined condition is at least as stringent as the underlying requirement):

1. PSD-88-1B, Condition 15, 9/1/89 as revised on 2/9/96
 - This requirement is incorporated into the streamlined condition.
2. NOC #170, Condition D.3, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06
 - This requirement is incorporated into the streamlined condition.
3. 40 CFR § 60.53b(c) as adopted by reference in SCAPCA Regulation I, Section 6.17.E, 1/13/99; and WAC 173-434-160(6), 12/22/03
 - This requirement is incorporated into the streamlined condition.

Streamlined condition 13S – MWC Firing Rate & Load Level Limit

This is a streamlined condition for underlying requirements, addressing the MWC firing rate and load level. The streamlined condition reads as follows:

13S. MWC Firing Rate & Load Limit. The maximum load level or allowable firing rate of each MWC, as measured by steam flow, using a 4-hour block arithmetic average, shall not exceed the following:

- a. Except as otherwise allowed in SCAPCA Regulation I, Section 6.17.E, 110% of the maximum demonstrated MWC unit load level, as determined using procedures in SCAPCA Regulation I, Section 6.17.H, during the last dioxins/furans performance test; and
- b. The highest level at which compliance has been demonstrated during any source test performed on the MWC.

[Streamlined condition for MWCs for the following requirements as they apply to these units: NOC #170, Condition B.4, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06 and 40 CFR § 60.53b(b) as adopted by reference in SCAPCA Regulation I, Section 6.17.E, 1/13/99]

The following is a discussion of the underlying requirements that are being streamlined and how compliance with the streamlined condition should assure compliance with the underlying requirement (i.e., that the streamlined condition is at least as stringent as the underlying requirement):

1. NOC #170, Condition B.4, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06
 - This requirement is incorporated into the streamlined condition. NOC Condition B.4 states “The maximum allowable firing rate of the equipment shall be the highest capacity at which compliance has been demonstrated by source testing.” It should be noted that SCAPCA added clarification to the streamlined condition that the maximum allowable firing rate shall not exceed the highest level at which compliance has been demonstrated *during any source test performed on the MWC* (emphasis added). Condition B.4 also does not contain an averaging time for the maximum firing rate. SCAPCA applied the steam flow averaging time consistent with the requirements under federal rules regulating MWCs (adopted in SCAPCA Regulation I, Section 6.17) to the NOC firing rate limit (i.e., 4 hour block average).
2. 40 CFR § 60.53b(b) as adopted by reference in SCAPCA Regulation I, Section 6.17.E, 1/13/99

- This requirement is incorporated into the streamlined condition.

PERMIT SHIELD FINDINGS

This final section of the permit lists regulations for which the facility has requested, and SCAPCA proposes to grant, a permit shield per WAC 173-401-640(2). The findings on which this shield is based are given below. These findings are summarized in the permit.

Requirements For Which a Shield Will Be Granted

1PS. Notice of Construction #170, Conditions D.10 & D.11. The facility uses air-cooled condensers instead of cooling towers, so these two requirements, regulating cooling towers, do not apply. [NOC #170, Conditions D.10 & D.11, 3/3/88 as revised on 8/31/89, 11/19/97, 4/23/98, & 8/8/06]

2PS. New Source Performance Standard Municipal Waste Combustors. Because 40 CFR Part 60, Subpart Ea applies to MWCs for which construction began after December 20, 1989 and before September 20, 1994, and construction for the two units designated in TABLE II.B-1 began before December 20, 1989, this standard does not apply to the two MWC units at the facility. [40 CFR Part 60, Subpart Ea, 1996]

Requirements For Which a Shield Will Not Be Granted

1. Lime Silo Baghouse Emission Standard, PSD-88-1B, Condition 10

Findings: Ecology has determined that the grain loading particulate standard included as Condition 10 applies, even through the unit exhausts inside. As such, the requirement must be included in the air operating permit and is contained in Condition 111. Therefore, SCAPCA cannot grant a permit shield for this requirement.

2. PSD Annual NOx Tonnage, PSD-88-1B, Condition 5

Findings: The annual NOx tonnage limit contained in the PSD permit is an applicable requirement, even if the annual NOx tonnage is inconsistent with the concentration limit. Ecology has not rescinded or revised the annual NOx tonnage limit of 184 tons per combustor, given in Condition 5 of PSD-88-1B. The annual NOx tonnage limit is included as part of the streamlined NOx emission limit, contained in Condition 87. Therefore, SCAPCA cannot grant a permit shield for this requirement.

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APPENDIX A
UNDERLYING APPLICABLE REQUIREMENTS