



# Air Operating Permit

Issued in accordance with:  
40 CFR Part 70, Chapter 70.94  
RCW, and Chapter 173-401 WAC

**3104 E. Augusta Ave., Spokane, WA 99207 (509) 477-4727**

PERMIT NO: AOP-7 – Renewal Permit #3

ISSUANCE DATE: SEPTEMBER 11, 2015

EXPIRATION DATE: SEPTEMBER 10, 2020

PERMITTEE: Mutual Materials Company  
P.O. Box 14705  
Spokane Valley, WA 99214

FACILITY LOCATION: Mica Brick Plant  
10627 South State Route 27  
Mica, WA 99023

FACILITY DESCRIPTION: Manufacturer of Bricks  
PRIMARY SIC: 3251  
AIRS AFS NO: WA-063-0122

RESPONSIBLE OFFICIAL WHO SUBMITTED APPLICATION: Joseph W. Bowen  
President

FACILITY CONTACT: Quinn Waterbly  
Mica Plant Manager  
(509) 924-2120

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Julie Oliver, Control Officer

## TABLE OF CONTENTS

TABLE OF CONTENTS .....	2
LIST OF ABBREVIATIONS.....	3
DEFINITIONS OF WORDS & PHRASES .....	4
<b>I. STANDARD TERMS &amp; CONDITIONS.....</b>	<b>5</b>
A. PERMIT ADMINISTRATION .....	5
B. INSPECTION & ENTRY .....	8
C. EMERGENCY PROVISIONS.....	8
D. GENERAL MONITORING, RECORDKEEPING, & REPORTING .....	10
E. COMPLIANCE CERTIFICATION .....	13
F. TRUTH AND ACCURACY OF STATEMENTS AND DOCUMENTS & TREATMENT OF DOCUMENTS .....	14
G. APPLICABLE WHEN TRIGGERED REQUIREMENTS.....	<del>14</del> 15
<b>II. EMISSION LIMITATIONS &amp; MONITORING AND REPORTING REQUIREMENTS .....</b>	<b><del>16</del> 16</b>
A. FACILITY-WIDE EMISSION LIMITATIONS.....	16
B. HAMMERMILL AND TWO CONVEYOR BELTS EMISSION LIMITATIONS.....	21
C. CRUSHER EMISSION LIMITATIONS.....	23
D. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS .....	<del>25</del> 25
<b>III. PERMIT SHIELD .....</b>	<b>31</b>
A. INAPPLICABLE REQUIREMENTS.....	31

## LIST OF ABBREVIATIONS

BACT	Best available control technology
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	Carbon monoxide
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
IEU	Insignificant Emission Units
MMBTU	Millions of British thermal units
MRRR	Monitoring, recordkeeping, & reporting requirements
NAA	Nonattainment area
NOC	Notice of Construction
NOx	Oxides of nitrogen
O <sub>2</sub>	Oxygen
O&M	Operation & maintenance
Pb	Lead
PM	Particulate matter
PM-10	Particulate matter, 10 microns or less in size
PM-2.5	Particulate matter, 2.5 microns or less in size
PSD	Prevention of Significant Deterioration
PSEU	Pollutant-Specific Emissions Unit
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 (on June 3, 2007, SCAPCA was renamed to SRCAA)
SRCAA	Spokane Regional Clean Air Agency (prior to June 3, 2007, agency was named SCAPCA)
scf	Standard cubic foot
SO <sub>2</sub>	Sulfur dioxide
SO <sub>x</sub>	Oxides of sulfur
VOC	Volatile organic compounds
WAC	Washington Administrative Code

## DEFINITIONS OF WORDS & 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(13), 8/10/11]
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), 8/10/11]
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(27), 11/28/12]
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(29), 11/28/12]
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(14), 8/10/11]
Opacity	The degree to which an object seen through a plume is obscured, stated as a percentage [WAC 173-400-030(58), 11/28/12]
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

The following note applies throughout this permit when indicated by the term “\* - see note on page 5.”

**NOTE:** For requirements which are federally enforceable because of inclusion in the State Implementation Plan (SIP), where the current filing date in the regulation is different from the filing date for SIP approved version, but the requirement itself has not changed, the most recent filing date is given, followed by the SIP version in parentheses.

Until this permit expires, is modified, or revoked, the permittee, Mutual Materials Company, is authorized to operate subject to the terms and conditions listed herein.

## I. STANDARD TERMS & CONDITIONS

### I.A. PERMIT ADMINISTRATION

**I.A.1. Federal Enforceability.** All terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the FCAA except those terms or conditions not required under the FCAA or under any of its applicable requirements and specifically so designated. All terms and conditions that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation. [WAC 173-401-625, 10/4/93]

**I.A.2. Duty to comply.** The permittee shall comply with all terms and conditions of this Chapter 401 permit. Any permit noncompliance shall constitute a violation of Chapter 70.94 RCW, and for federally enforceable provisions, a violation of the Federal Clean Air Act. Such violations are grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [WAC 173-401-620(2)(a), 10/4/93]

**I.A.3. Schedule of Compliance.** The permittee will continue to comply with all applicable requirements with which the source is in compliance. The permittee will meet, on a timely basis, any applicable requirements that become effective during the permit term. [WAC 173-401-630(3), 10/4/93]

**I.A.4. Need to Halt or Reduce Activity Not a Defense.** It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [WAC 173-401-620(2)(b), 10/4/93]

**I.A.5. Permit Actions.** This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [WAC 173-401-620(2)(c), 10/4/93]

**I.A.6. Reopening for Cause.** The permit shall be reopened and revised under any of the following circumstances:

- a. Additional requirements become applicable to the facility and the remaining permit term is three or more years. Such reopening shall be completed not later than eighteen

months after promulgation of the applicable requirement. Such reopening is not required if the effective date of the new requirement is later than the date on which this permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j). (See Condition I.A.15- Permit Continuation below);

b. SRCAA or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or

c. SRCAA or the Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

[WAC 173-401-730, 10/4/93]

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

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

**I.A.9. Duty to provide information.** The permittee shall furnish within a reasonable time to SRCAA, any information that SRCAA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to SRCAA copies of records required to be kept by the permit or, for information claimed confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. SRCAA shall maintain confidentiality of such information in accordance with RCW 70.94.205. [WAC 173-401-620(2)(e), 10/4/93]

**I.A.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, shall promptly submit such supplementary facts or corrected information. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit. [WAC 173-401-500(6), 9/16/02]

**I.A.11. Permit Fees.** The permittee shall pay fees as a condition of this permit in accordance with SRCAA's fee schedule. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in Chapter 70.94 RCW. [WAC 173-401-620(2)(f), 10/4/93]

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

**I.A.13. Permit Appeals.** This permit or any conditions in it may be appealed only by filing an appeal with the Pollution Control Hearings Board and serving it on SRCAA 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), 10/4/93] [WAC 173-401-

735(1), 4/2/97]

**I.A.14 Permit Renewal and Expiration.** This permit shall be in effect for five years from the date of issuance as indicated on the cover page. The permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete application for renewal is submitted to SRCAA at least 12 months, but no more than 18 months, prior to the date of permit expiration. Upon SRCAA's receipt of a timely and complete application, the facility may continue to operate subject to final action by SRCAA on the application. This protection shall cease to apply if, subsequent to a completeness determination, the applicant fails to submit, by the deadline specified in writing by SRCAA, any additional information identified as necessary to process the application. The application shall be sent to:

Director  
Spokane Regional Clean Air Agency  
3104 E. Augusta Ave.  
Spokane WA 99207

[WAC 173-401-610, 10/4/93] [WAC 173-401-705, 10/4/93] [WAC 173-401-710(1), 9/16/02]

**I.A.15. Permit Continuation.** This permit and all terms and conditions contained herein, including any permit shield provided under Condition I.A.16-Permit Shield and Section III. PERMIT SHIELD, shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect 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]

**I.A.16. Permit Shield.** Compliance with a permit condition is deemed compliance with the applicable requirements upon which that condition is based, as of the date of permit issuance.

This permit shield shall not alter or 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 SRCAA 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 III. PERMIT SHIELD for requirements that have been deemed inapplicable to this facility.)

## I.B. INSPECTION & ENTRY

**I.B.1. Inspection and Entry.** Upon presentation of credentials and other documents as may be required by law, the permittee shall allow SRCAA, 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), practices, or operations regulated or required under this permit; and
- d. 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] [SRCAA Regulation I, Article II, Section 2.02.E & F, 3/4/04 - STATE/LOCAL ONLY] [NOC #1495, Condition #10, 9/22/10] 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]

**I.B.2. Obstruction of Access.** No person shall obstruct, hamper, or interfere with any authorized representative of SRCAA 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. [RCW 70.94.200, 1998 - STATE/LOCAL ONLY] [SRCAA Regulation I, Article II, Section 2.02.E & F, 3/4/04 - STATE/LOCAL ONLY] [NOC #1495, Condition 10, 9/22/10]

## I.C. EMERGENCY PROVISIONS

**IC.1. 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 SRCAA in accordance with Condition I.D.7- Prompt Reporting of Deviations and submits a report in accordance with Condition I.C.4- 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 I.C.2-Excess Emissions and Condition I.C.3-Report of Breakdown below. [WAC 173-401-645, 10/4/93] [WAC 173-401-615(3)(b), 9/16/02]

**I.C.2. 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 (until the effective date of EPA's incorporation of WAC [173-400-](#)



[108](#) and [173-400-109](#) into the Washington state implementation plan) or WAC 173-400-108 and WAC 173-400-109 (on and after the effective date of EPA's incorporation of WAC [173-400-108](#) and [173-400-109](#) into the Washington state implementation plan), such emissions are violations of the applicable statute, regulation, permit, or regulatory order but are not subject to penalty. The permittee shall submit a notification of the excess emissions in accordance with I.D.7- Prompt Reporting of Deviations below, and upon request by SRCAA, submit a report in accordance with Condition I.C.4-Emergency, Excess Emissions, Upset Conditions and/or Breakdown Reports below. [WAC 173-400-107, 108, 109, 3/1/11] [WAC 173-401-615(3)(b), 9/16/02]

**I.C.3. Report of Breakdown for State/Local Only Requirements in SRCAA Regulation I.** If pollutants are emitted in excess of the limits established by SRCAA Regulation I as a direct result of unavoidable upset conditions or unavoidable and unforeseeable breakdown of equipment or control apparatus, SRCAA may excuse the permittee from penalties if the permittee submits a notification of the breakdown is reported in accordance with Condition I.D.7- Prompt Reporting of Deviations below and upon request by SRCAA's control officer, submits a report in accordance with Condition I.C.4-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 SRCAA Regulation I or be subject to the penalties in SRCAA 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. [SRCAA Regulation I, Section 6.08, 3/4/04- STATE/LOCAL ONLY] [NOC #1495, Condition 8, 9/22/10]

**I.C.4. Emergency, Excess Emissions, Upset Conditions and/or Breakdown Reports.** In the event of emergencies, excess emissions, upset conditions, and/or breakdowns (see Conditions I.C.1, I.C.2, & I.C.3 above), if requested by SRCAA, or if required under an applicable requirement, the permittee shall submit a full written report including:

- a. Date, time, and duration of the event,
- b. Known causes of the event;
- c. Records documenting the permittee's actions in response to the excess emissions event;
- d. Steps taken to repair the breakdown, if applicable, including a schedule to complete the repairs;
- e. Corrective actions taken, including preventative measures to be taken to minimize or eliminate the chance of recurrence;

- f. Information on whether emission monitoring and pollution control systems were operating at the time of the exceedance. If either or both systems were not operating, information on the cause and duration of the outage; and
- g. All additional information required under WAC 173-400-107 (until the effective date of EPA's incorporation of WAC [173-400-108](#) and [173-400-109](#) into the Washington state implementation plan) or WAC 173-400-109 (on and after the effective date of EPA's incorporation of WAC [173-400-108](#) and [173-400-109](#) into the Washington state implementation plan) supporting the claim that the excess emissions were unavoidable.

[WAC 173-401-615(3)(b), 9/16/02] [WAC 173-400-107, 108, 109, 3/1/11] [SRCAA Regulation I, Section 6.08, 3/4/04 – STATE/LOCAL ONLY]

## **I.D. GENERAL MONITORING, RECORDKEEPING, & REPORTING**

**I.D.1. Records of Required Monitoring Information.** The permittee shall keep records of monitoring information including:

- a. the date, place as defined in this permit, and time of sampling and measurements;
- b. the date(s) analyses were performed;
- c. the company or entity that performed the analyses;
- d. the analytical techniques or methods used;
- e. the results of such analyses; and
- f. the operating conditions existing at the time of sampling or measurement.

[WAC 173-401-615(2)(a), 9/16/02]

**I.D.2. Permanent Shutdown of an Emission Unit.** If an emission unit is permanently shut down, thereby rendering existing permit terms and conditions irrelevant, the permittee shall not be 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, shall be kept in accordance with Conditions I.D.1- Records of Required Monitoring Information and I.D.5 – Retention of Records.

Contemporaneous with the shutdown of the emission unit, the permittee shall record the date that operation of the emission unit ceased, using a log or file on site. The shutdown date shall be reported to SRCAA on the monitoring report, required under Condition I.D.6 – 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]

**I.D.3. Operational Flexibility.** In the event that an emission unit is not operated during a period equal to or greater than the monitoring period designated, no monitoring is required. Recordkeeping and reporting must note the reason why and length of time that the emission

unit was not operated. [WAC 173-401-650(1)(a), 10/4/93]

**I.D.4. Records of Changes.** The permittee shall 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 those changes. [WAC 173-401-615(2)(b), 9/16/02]

**I.D.5. Retention of Records.** The permittee shall keep records of all required monitoring data and support information for a period of five years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. [WAC 173-401-615(2)(c), 9/16/02]

**I.D.6. Monitoring Reports.** Unless a shorter time period is specified by this permit, reports of any required monitoring shall be submitted to SRCAA as follows:

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

The reports shall be certified as required in Condition I.D.11-Report Submittals. Provided, 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 shall 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; and
- c. Any permanent emission unit shutdowns as described in Condition I.D.2-Permanent Shutdown of an Emission Unit, respectively.

[WAC 173-401-615(3)(a), 9/16/02] [WAC 173-401-615(1) & (2), 9/16/02]

**I.D.7. Prompt Reporting of Deviations.** The permittee shall promptly report deviations from permit requirements, including:

- Deviations attributable to upset conditions, as defined in this permit;
- Excess emissions due to emergencies (see Condition I.C.1) and/or scheduled maintenance; and
- Any time a startup, shutdown, breakdown, or upset condition occurs which resulted in excess emissions or could result in an emissions violation or a violation of an ambient air quality standard.

Reports of deviations shall 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 I.C.1-Emergencies, Condition I.C.2-Excess Emissions and/or Condition I.C.3-Report of Breakdown, and in the case where an unplanned condition, such as a breakdown or upset occurs, which could result in an emissions violation or violation of an ambient air quality standard, 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, the deviation shall be reported as part of the next monitoring report, or no later than 30 days after the end of the month during which the deviation is discovered, whichever is sooner.

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), 3/1/11; SRCAA Regulation I, Section 6.08.A.1, 3/4/04 – STATE/LOCAL ONLY]

**I.D.8. Emission Inventory.** The permittee shall submit an inventory of emissions from the source each year. The inventory shall include stack and fugitive emissions of particulate matter, PM10, sulfur dioxide, carbon monoxide, total reduced sulfur compounds, fluorides, lead, volatile organic compounds, and other contaminants. The inventory shall be submitted no later than one hundred five days after the end of the calendar year. The permittee shall maintain records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards. [WAC 173-400-105(1), 8/20/93] [WAC 173-400-105(1), 11/28/12 – STATE/LOCAL ONLY]

**I.D.9. Reporting of Emissions of Greenhouse Gases.** The permittee shall comply with the applicable requirements given in Chapter 173-441 WAC related to the reporting of emissions of greenhouse gases. [12/1/10 – STATE/LOCAL ONLY]

**I.D.10. WAC 173-401-530(1)(a) Insignificant Emission Units.** Emission units or activities which qualify as insignificant solely on the basis of WAC 173-401-530(1)(a) shall not exceed the emissions thresholds specified in WAC 173-401-530(4) until this permit is modified pursuant to WAC 173-401-725. Upon request from SRCAA, the permittee shall demonstrate that the actual emissions of such a unit or activity are below the applicable emission thresholds. SRCAA shall include in its request a deadline by which the permittee shall submit the emissions data. [WAC 173-401-530(6), 9/16/02]

**I.D.11. Report Submittals.** All application forms, reports, and compliance certifications required in this permit shall be submitted to:

Director  
Spokane Regional Clean Air Agency  
3104 E. Augusta Ave.  
Spokane, WA 99207

All such application forms, reports, and compliance certifications must be certified by a responsible official. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information contained in the report are true, accurate and complete. [WAC 173-401-520, 10/4/93]

**I.D.12. Rendering Device or Method Inaccurate.** The permittee shall 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), 11/28/12 – STATE/LOCAL ONLY]

## **I.E. COMPLIANCE CERTIFICATION**

**I.E.1. Compliance Certification Submittals.** The permittee shall submit compliance certifications once per year to SRCAA in accordance with Condition I.D.11-Report Submittals. The compliance certification shall be submitted no later than one hundred and five days after the end of the calendar year for which certification is being made. For emission units not in compliance with terms and conditions of this permit, SRCAA may require more frequent submission of compliance certifications. Additionally, where specified in an applicable requirement, more frequent compliance certifications shall be submitted. [WAC 173-401-630(5)(a), 10/4/93]

**I.E.2. Compliance Certification Contents.** The compliance certification shall include:

- a. the identification of each term or condition of the permit that is the basis of the certification;
- b. the compliance status;
- c. whether compliance was continuous or intermittent;
- d. the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with WAC 173-401-615(3)(a) (see Condition I.D.6-Monitoring Reports above); and
- e. such other facts as SRCAA may, in writing, require from the permittee to determine the compliance status of the source.

Where the permit does not require testing, monitoring, recordkeeping, and reporting for insignificant emission units or activities, the permittee may certify continuous compliance if there were no observed, documented, or known instances of noncompliance during the reporting period. Where the permit requires testing, monitoring, recordkeeping, and reporting for insignificant emission units or activities, the permittee may certify continuous compliance when the testing, monitoring, recordkeeping required by the permit revealed no violations during the period, and there were no observed, documented, or known instances of noncompliance during the reporting period.

[WAC 173-401-630(5)(c), 10/4/93] [WAC 173-401-530(c), 9/16/02]

**I.E.3. Credible Evidence.** For the purpose of submitting compliance certifications or establishing violations, the permittee shall not preclude the use, including the exclusive use, of

any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. [40 CFR 60.11(g), 1/12/11] [WAC 173-400-115, 11/28/12]

**I.E.4 Submittal to EPA.** The permittee shall submit a copy of all compliance certifications to the Administrator, no later than one hundred and five days after the end of the calendar year for which certification is being made, at the following address:

Administrator  
USEPA  
MS OAQ-107  
1200 Sixth Avenue  
Seattle, WA 98101

[WAC 173-401-630(5)(d), 10/4/93]

## **I.F. TRUTH AND ACCURACY OF STATEMENTS AND DOCUMENTS & TREATMENT OF DOCUMENTS**

**I.F.1. False Information.** The permittee shall 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. [WAC 173-400-105(6), 8/20/93] [WAC 173-400-105(6), 11/28/12 – STATE/LOCAL ONLY]

In addition, the permittee shall not willfully make a false or misleading statement to the Board of Directors of SRCAA or their authorized representatives as to any matter within the jurisdiction of the Board. [SRCAA Regulation I, 2.08.A, 3/4/04 - STATE/LOCAL ONLY]

**I.F.2 Alteration of Documents.** The permittee shall not reproduce or alter or cause to be reproduced or altered any order or other paper issued by SRCAA if the purpose of such reproduction or alteration is to evade or violate any provision of SRCAA Regulation I or any other law. [SRCAA Regulation I, 2.08.B, 3/4/04 - STATE/LOCAL ONLY]

**I.F.3 Availability of Documents.** Any order required to be obtained by SRCAA Regulation I shall be available on the premises designated on the order. [SRCAA Regulation I, 2.08.C, 8/3/4 - STATE/LOCAL ONLY]

**I.F.4 Posting of Notices.** In the event SRCAA requires a notice to be displayed, it shall be posted. The permittee shall not mutilate, obstruct, or remove any notice unless authorized to do so by the SRCAA Board of Directors. [SRCAA Regulation I, 2.08.D, 3/4/04 - STATE/LOCAL ONLY]

## **I.G. APPLICABLE WHEN TRIGGERED REQUIREMENTS**

The following conditions summarize requirements that apply if the permittee undertakes the activities specified in the requirement or proposes changes to the source that trigger the

applicability of the requirement. The permit does not require monitoring for compliance with the requirements, but the compliance certification required by Condition I.E.1-Compliance Certification Submittals shall describe the permittee's compliance with these requirements.

**I.G.1 New Source Review.** Prior to the establishment of a new source, including modifications, the permittee may be required to file for and obtain approval under SRCAA's Notice of Construction program. [WAC 173-400-110, 9/20/93] [Chapter 173-400 WAC, 11/28/12 – STATE/LOCAL ONLY] [Chapter 173-460 WAC, 5/20/09 - STATE/LOCAL ONLY] [SRCAA Regulation I, Article V, 5/3/07 - STATE/LOCAL ONLY]

**I.G.2 Replacement or Substantial Alteration of Existing Control Equipment.** Prior to replacing or substantially altering existing control equipment, the permittee shall file for and obtain approval under SRCAA's Notice of Construction program. [WAC 173-400-114, 11/28/12 - STATE/LOCAL ONLY] [SRCAA Regulation I, Article V, 5/3/07 - STATE/LOCAL ONLY]

**I.G.3 Demolition and Renovation (Asbestos).** The permittee shall comply with applicable local, state, and federal requirements regarding demolition and renovation. [40 CFR 61 Subpart M, 2006] [WAC 173-400-075, 11/28/12] [SRCAA Regulation I, Article IX, 8/5/10 - STATE/LOCAL ONLY]

**I.G.4. Source Testing.** To demonstrate compliance Ecology or SRCAA may conduct or require that a test be conducted using approved EPA methods from 40 CFR Parts 51, 60, 61, and 63 which are adopted by reference or approved procedures contained in "Source Test Manual - Procedures for Compliance Testing," State of Washington, Department of Ecology, as of September 20, 2004, on file at Ecology. All testing shall be performed in accordance with SRCAA Regulation I, Section 2.09, "Source Tests." The permittee may be required to provide the necessary platform and sampling ports for Ecology personnel or others to perform a test of an emission unit. Ecology or SRCAA shall be allowed to obtain a sample from any emission unit. The permittee shall be given an opportunity to observe the sampling and to obtain a sample at the same time.

Methods or procedures shall be considered approved if the source submits a source test plan to SRCAA at least 30 days prior to the testing date, or a shorter time if designated in writing by SRCAA, and SRCAA approves the plan in writing. In order to maintain the approved status for the methods and/or procedures, any changes to the plan shall be approved by SRCAA in writing prior to implementation. [WAC 173-400-105(4), 8/20/93] [WAC 173-400-105(4), 11/28/12 - STATE/LOCAL ONLY] [WAC 173-401-615(1), 9/16/02] [SRCAA Regulation I, Section 2.09, 2/7/08]

**I.G.5 Fluoride Monitoring.** When requested by the Department of Ecology, the permittee shall conduct a monitoring program to determine whether the Forage Standards in WAC 173-481-100 and the Ambient Standards in WAC 173-481-110 are being met. The monitoring program shall be approved in writing by the Department of Ecology. Monitoring data shall be submitted to the Department of Ecology and SRCAA. [WAC 173-481-100, 173-481-110, 173-481-150, & 173-481-160, 9/23/05 – STATE/LOCAL ONLY]

## II. EMISSION LIMITATIONS & MONITORING AND REPORTING REQUIREMENTS

This section contains emission limitations and emission related requirements including general requirements that apply facility-wide and requirements specific to individual, or groups of, emission units. Applicable requirements are listed in the third column in emission limitation tables. The basis for the applicable requirements is listed in the second column of the emission limitation tables. The averaging time and reference test method, used to determine compliance with the requirement, 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 sixth column of the emission limitation tables. The MRRR are given at the end of this section.

Some facility-wide requirements may be repeated in emission limitation tables for individual emission units or groups of emission units if additional monitoring is required for that emission unit or group of emission units. Facility-wide requirements apply to all emission units regardless of whether they are listed in every emission limitations table unless otherwise exempted in SECTION III. PERMIT SHIELD.

### II.A. FACILITY-WIDE EMISSION LIMITATIONS

TABLE II.A-3 lists the applicable emission limitations that apply facility-wide. These facility-wide emission limitations apply to all significant and insignificant emissions units at Mutual Materials. 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 under the FCAA. The permittee is required to certify compliance with the facility-wide emission limitations for all significant and insignificant emission units (see Condition I.E.2 – Compliance Certification Contents).

SRCAA has determined that testing, monitoring, recordkeeping, and reporting are necessary for some of the insignificant emission units at Mutual Materials. Specifically, SRCAA has determined that testing, monitoring, recordkeeping, and reporting are necessary for the insignificant emission units presented in Table II.A-2 to assure compliance with the generally applicable requirements. Therefore, the requirements given in II.D. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS and in I.D. GENERAL MONITORING, RECORDKEEPING, & REPORTING are required for all significant emission units, listed in Table II.A-1 below, and for the insignificant emission units listed in Table II.A-2 below.

TABLE II.A-1 – Significant Emission Units

Emission Point #	Description	Air Pollution Control Equipment
1	Swindell Dressler Tunnel Kiln – natural gas fired (27.5 MMBtu/hr) (no NOC)	None
2	Two Periodic Kilns – natural gas fired (each 11 MMBtu/hr) (no NOC)	None



Emission Point #	Description	Air Pollution Control Equipment
4	Two Batch Dryers – natural gas fired (each 1.5 MMBtu/hr) (no NOC)	None
7	Kiln Car Cleaning System (no NOC)	Baghouse
N/A – Not included in original application (included in renewal #3 application as EP #3)	Hammermill & two conveyor belts, and associated grinding/screening (NOC #845)	Water applied to clay prior to hammermill
N/A – Not included in original application (included in renewal #3 application as EP #8)	Jaw crusher at palletized brick selection area (NOC #1495)	Water spray bars or equivalent dust suppression system

TABLE II.A-2 – Insignificant Emission Units that are Subject to Monitoring, Recordkeeping & Reporting Requirements given in II.D and I.D

Emission Unit Description	ID Number Used in Permit Application	Basis / Justification for IEU Designation
Raw Material Grinding – other than grinding done in hammermill (Hammermill is considered a Significant Emission Unit)	EP #3, Seg. #1	WAC 173-401-530(1)(d)
Raw Material Storage	EP #3, Seg. #2	WAC 173-401-530(1)(d)
Raw Material Screening	EP #3, Seg. #3	WAC 173-401-530(1)(d)
Mining, Stockpiling, and Hauling (On 04/11/75, an NOC was approved for the clay mining operation. However, no approval conditions were issued with the NOC approval, the emissions from these operations are fugitive, and only requirements are the generally applicable requirements)	N/A – No number used in permit application	WAC 173-401-530(1)(d)
Operation & Maintenance of Storage Yard	N/A – No number used in permit application	WAC 173-401-532(33) & (35)
Operation & Maintenance of Parking Lots	N/A – No number used in permit application	WAC 173-401-532(33) & (35)

TABLE II.A-3 - Facility-wide Emission Limitations

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
II.A.1	WAC 173-400-040, 8/20/93 WAC 173-400-040, 3/1/11 – STATE/LOCAL ONLY	All emission units are required to use reasonably available control technology, in accordance with WAC 173-400-040 – STATE/LOCAL ONLY			No MRRR Required
II.A.2	WAC 173-400-040(1), 173-400-040(1)(a), & 173-400-040(1)(b), 3/1/11 (8/20/93) – see note on page 5	Visible emissions shall not exceed 20%, as specified in WAC 173-400-040	ECOLOGY Method 9A (September 20, 2004,	3 minute aggregate in any 1 hour period	1M
II.A.3	SRCAA Regulation I, 6.02, 3/4/04 - STATE/LOCAL ONLY	Visible Emissions shall not equal or exceed 20%, as specified in SRCAA Regulation I, 6.02 - STATE/LOCAL ONLY	ECOLOGY Method 9A (September 20, 2004)	3 minute aggregate in any 1 hour period	1M
II.A.4	WAC 173-400-040(2), 3/1/11 - STATE/LOCAL ONLY  SRCAA Regulation I, 6.05.A, 3/4/04(11/12/93)* - see note on page 5	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			2M
II.A.5	SRCAA Regulation I, 6.05.C, 3/4/04(11/12/93)* - see note on page 5 SRCAA Regulation I, 6.05.D, 3/4/04(11/12/93)* - see note on page 5 WAC 173-400-040(4)(a), 3/1/11(11/12/93)* - see note on page 5 SRCAA Regulation I, Section 6.05.B, 3/4/04(11/12/93)* - see note on page 5 WAC 173-400-040(9)(a), 3/1/11(8/20/93)* - see note on page 5	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			2M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
		PM; and e. Prevent fugitive dust from becoming airborne and source must be maintained and operated to minimize emissions.			
II.A.6	WAC 173-400-040(5), 3/1/11- STATE/LOCAL ONLY	Recognized good practices and procedures must be used to reduce odors to a reasonable minimum, in accordance with WAC 173-400-040(5)			2M
II.A.7	SRCAA Regulation I, Section 6.04, 4/2/10 - STATE/LOCAL ONLY	It shall be unlawful for any person to cause or allow the emission of any air contaminant in sufficient quantities and of such characteristics and duration as is, or is likely to be:  a. Injurious to the health and safety of human, animal or plant life;  b. Injurious or cause damage to property; or  c. Which unreasonably interferes with enjoyment of life and property.  Compliance with this requirement shall be determined per the provisions given in SRCAA Regulation I, Section 6.04 (4/2/10)  STATE / LOCAL ONLY			2M
II.A.8	WAC 173-400-040(6), 3/1/11(8/20/93)* - see note on page 5  SRCAA Regulation I, 6.06.A, 3/4/04 - STATE/LOCAL ONLY	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			2M
II.A.9	WAC 173-400-040(8), 3/1/11(8/20/93)* - see note on page 5  SRCAA Regulation, 6.07, 3/4/04 - STATE/LOCAL ONLY	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			No MRRR Required
II.A.10	WAC 173-400-050(1) &	Particulate matter emissions	RM 5 (July)	average	1M, 3M, 4M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	WAC 173-400-050(3), 11/28/12(2/19/91)* - see note on page 5  NOTE: The exception in WAC 173-400-050(3) is STATE/LOCAL ONLY.	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 SRCAA to be representative of normal operations.	1, 1993) or procedures in WAC 173-400-050 approved per Condition I.G.4-Source Testing	of three one- hour tests	
II.A.11	WAC 173-400-060, 2/19/91 WAC 173-400-060, 1/10/05 – STATE/LOCAL ONLY	Particulate matter emissions from general process units shall not exceed 0.1 gr/dscf, as specified in WAC 173-400-060	RM 5 (July 1, 1993) or procedures in WAC 173-400-060 approved per Condition I.G.4-Source Testing	average of three one- hour tests	1M
II.A.12	WAC 173-400-040(7), 3/1/11(8/20/93)* - see note on page 5  NOTE: The second paragraph of WAC 173-400-040(7) is STATE/LOCAL ONLY	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(7)  NOTE: The second paragraph of WAC 173-400-040(7) is STATE/LOCAL ONLY	Procedures in WAC 173-400-105(4) approved per Condition I.G.4-Source Testing	any period of 60 consecutive minutes	3M
II.A.13	WAC 173-400-200, 1/10/05(2/19/91)* - see note on page 5	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.			No MRRR Required
II.A.14	WAC 173-400-205, 2/19/91	No varying of emissions according to atmospheric conditions or ambient concentrations is allowed, except as allowed under WAC 173-400-205			No MRRR Required
II.A.15	Chapter 173-425 WAC, 3/13/00(10/18/90)* - see note on page 5	No outdoor burning, except as allowed under Chapter 173-425 WAC and/or SRCAA			No MRRR Required

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
	SRCAA Regulation I, 6.01, 10/3/13 - STATE/LOCAL ONLY	Regulation I, 6.01			
II.A.16	40 CFR Part 82, 2006 (except those subparts for which a shield is granted in Section III below)	Handling and use of chlorofluorocarbons (CFCs) must be in accord with 40 CFR Part 82			No MRRR Required

## II.B. HAMMERMILL AND TWO CONVEYOR BELTS EMISSION LIMITATIONS

This section of the permit covers the hammermill and two associated conveyor belts which were installed at the site in 1997 and approved by SRCAA under NOC #845. Table II.B.1 provides the applicable requirements for this equipment. 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 under the FCAA.

Table II.B.1 - Hammermill and Two Conveyor Belts Emission Limitations

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
II.B.1	NOC #845, Condition 2, 9/10/97 as revised on 7/23/02	Sufficient water shall be added to the clay to control emissions from the hammermill and associated transfer points according to the approved operation plan for the hammermill, dated August 25, 2004.			5M
II.B.2	NOC #845, Condition 3, 9/10/97 as revised on 7/23/02	Opacity from the hammermill and transfer points on the two conveyor belts approved under NOC #845 shall not exceed 10%.	RM 9 (1995)	6-minute average	1M, 5M, 7M

II.B.3	40 CFR § 60.672(b), 4/28/09  40 CFR § 60.11(c), 2000 WAC 173-400-115, 11/28/12	Fugitive emissions from the two conveyor belts transfer points into the atmosphere shall not exceed 10% opacity. (Truck dumping of nonmetallic minerals into any screen, feed hopper, or crusher is exempt from this requirement.) The opacity standard shall apply at all times except during periods of startup, malfunction, and as otherwise provided for in 40 CFR 60, Subpart OOO.	RM 9 (1995)	6-minute average	1M, 5M, 7M
II.B.4	40 CFR § 60.672(c), 4/28/09  40 CFR § 60.11(c), 2000 WAC 173-400-115, 11/28/12	Fugitive emissions from the hammermill into the atmosphere shall not exceed 15% opacity. (Truck dumping of nonmetallic minerals into any screen, feed hopper, or crusher is exempt from this requirement.) The opacity standard shall apply at all times except during periods of startup, malfunction, and as otherwise provided for in 40 CFR 60, Subpart OOO.	RM 9 (1995)	6-minute average	1M, 5M, 7M
II.B.5	40 CFR § 60.12, 1974  WAC 173-400-115, 11/28/12	The permittee shall not conceal any emission which would otherwise constitute a violation of an applicable standard under 40 CFR Part 60 (e.g., addition of diluent gases).			No MRRR Required
II.B.6	40 CFR § 60.11(d), 2000 WAC 173-400-115, 11/28/12	At all times, including periods of startup, shutdown, and malfunction, to the extent possible, the hammermill and two conveyor belts, and associated air pollution control equipment shall be operated in a manner consistent with good air pollution control practices for minimizing emissions.			No MRRR Required
II.B.7	NOC #845, Condition 5, 9/10/97 as revised on 7/23/02	Mutual Materials is limited to an annual production rate of 84,000 tons of fired products in the tunnel kiln and 3,000 tons of fired products in the periodic kilns, based on a 12-month rolling total.			6M, 7M
II.B.8	NOC #845, Condition 5, 9/10/97 as revised on 7/23/02	Only clay and clay products, intended for use as raw materials in products fired in the tunnel kiln and periodic kilns, may be processed in the hammermill.			No MRRR Required

II.B.9	NOC #845, Condition 7.b, 9/10/97 as revised on 7/23/02  40 CFR § 60.7(a)(4), 1999  WAC 173-400-115, 11/28/12	Notification of any physical change which may increase PM emissions along with a description of the nature of the change shall be submitted to SRCAA at least 60 days, or as soon as practicable, prior to the change. NOTE: If applicable, the Notice of Construction provisions of Condition I.G.1- New Source Review must also be met prior to making the change.			No MRRR Required
II.B.10	NOC #845, Condition 9, 9/10/97 as revised on 7/23/02	A copy of NOC #845 along with the approval letter shall be kept on file at the facility and made available to SRCAA personnel upon request.			No MRRR Required

## II.C. CRUSHER EMISSION LIMITATIONS

This section of the permit covers the jaw crusher at the palletized brick selection area, which was approved by SRCAA under NOC #1495. Table II.C.1 provides the applicable requirements for this equipment. 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 under the FCAA.

Table II.C.1 - Crusher Emission Limitations

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
II.C.1	NOC #1495, Condition 2, 9/22/10	A copy of the Notice of Construction #1495 application and the conditions of approval shall be kept on site and made available to SRCAA personnel upon request.			No MRRR Required
II.C.2	NOC #1495, Condition 3, 9/22/10	Water spray bars with a sufficient number of fog nozzles, or equivalent dust suppression systems, shall be used as required when crushing is occurring to control fugitive dust emissions generated at transfer points, conveyor drop points, and other fugitive dust emission points.  The fog nozzles, or their equivalent, and their orifices shall be cleaned and adjusted periodically to ensure proper			8M, 9M

Condition Number	Basis for Requirement	Requirement	Reference Test Method, If Applicable	Averaging Time, If Applicable	MRRR Reference
		dust suppression.  During periods of cold weather when water spray bars cannot successfully be used, other dust control measures shall be used in lieu of water to control fugitive dust emissions, including bypassing the crusher, using tarps, etc.			
II.C.3	NOC #1495, Condition 4, 9/22/10	The crusher, conveyors, and dust suppression systems shall be maintained in good operating condition.			9M, 10M
II.C.4	NOC #1495, Condition 5, 9/22/10	Reasonable precautions must be taken to prevent particulate matter (PM) or fugitive dust from becoming airborne from storage piles, processing equipment, transfer points, traveled surfaces, staging areas, parking areas, and other sources of particulate matter (i.e., fugitive dust).			2M
II.C.5	NOC #1495, Condition 6, 9/22/10	The deposition of particulate matter onto the property of others or beyond the property line is prohibited.			2M
II.C.6	40 CFR § 60.672(b), 4/28/09  40 CFR § 60.11(c), 2000 WAC 173-400-115, 11/28/12  NOC #1495, Condition 7, 9/22/10	Fugitive emissions from the jaw crusher at the palletized brick selection area shall not exceed 15% opacity. The opacity standard shall apply at all times except during periods of startup, malfunction, and as otherwise provided for in 40 CFR 60, Subpart OOO.	RM 9 (1995)	6-minute average	1M, 8M, 9M
II.C.7	40 CFR § 60.672(b), 4/28/09  40 CFR § 60.11(c), 2000 WAC 173-400-115, 11/28/12  NOC #1495, Condition 7, 9/22/10	Fugitive emissions from any conveyor transfer point associated with the crusher at the palletized brick selection area shall not exceed 10% opacity. The opacity standard shall apply at all times except during periods of startup, malfunction, and as otherwise provided for in 40 CFR 60, Subpart OOO.	RM 9 (1995)	6-minute average	1M, 8M, 9M



## II.D. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

**1M.** The permittee shall meet the requirements given in a) and if triggered, the permittee shall meet the requirements given in b) and/or c).

a) The permittee shall perform weekly inspections during daylight hours while the facility is operating for the purpose of observing points of visible emissions and PM emissions from all from all significant emission units and insignificant emission units listed in Tables II.A-1 and II.A-2 of this permit. The weekly inspections shall be conducted as follows:

- 1) each inspection shall be conducted from a location(s) with a clear view of each emission source where the sun is not directly in the observer's eyes. The inspection location(s) shall be at least 15 feet but not more than 0.25 miles from the emission source;
- 2) the observer shall be educated in the general procedures for determining the presence of visible emissions (i.e., effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, and observer position relative to the source and sun);
- 3) each inspection shall consist of a minimum 15-second visual observation of each emission source to identify those emission sources which exhibit visible emissions; and
- 4) records shall be kept of each inspection, including the name of the observer, the date and time of the inspection, and the observations made during the inspection. Records shall be kept in accordance Condition I.D.5- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

If visible emissions are not observed from any emission source at the facility during the weekly inspection, no additional action is required. If visible emissions are observed from any emission source, the permittee shall take further action according to b).

b) If visible emissions are observed during an inspection or are otherwise observed by the permittee, the permittee shall verify and certify that:

- 1) the visible emissions or PM emissions are not the result of equipment malfunction, and the equipment, if any, from which the emissions are released, is performing its normal, designed function;
- 2) the air pollution control equipment, if any, is being operated properly in accordance with normal operating procedures; and
- 3) if the visible emissions are the result of fugitive emissions, reasonable precautions are being taken to minimize emissions.

If b) 1), b) 2), and/or b) 3) are not being met, corrective action must be taken as soon as possible, but no later than three days from discovery, to correct the problem. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations.

The permittee shall keep records of any verifications made regarding b) 1), b) 2), and/or b) 3) and a description of any corrective action taken. Records shall be kept in accordance

Condition I.D.5- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

If b) 1), b) 2), and b) 3), are being met, but visible emissions are still observed, the permittee shall take further action according to c).

- c) If visible emissions are still observed and b) 1), b) 2), and b) 3) are being met, the permittee shall perform testing according to c) 1) and, if a particulate matter standard applies, testing according to c) 2).
- 1) As a means of demonstrating compliance with the visible emissions standard(s), the permittee shall perform, or have performed, RM 9 (July 1, 1993) or Ecology Method 9A (September 20, 2004), whichever is applicable, on the source of the visible emissions. The test shall occur within a reasonable timeframe but no later than 24 hours after discovery of the emissions. If the visible emissions exceed the applicable standard, the permittee shall take timely and appropriate corrective action (as soon as possible, but within 24 hours) to address the problem. The results of the RM 9 or Ecology Method 9A test shall be submitted to SRCAA within two working days of the test.
  - 2) As a means of demonstrating compliance with PM emission limit(s), the permittee shall perform, or have performed, RM 5 (July 1, 1993) on the source of the emissions. The test shall occur within a reasonable timeframe but no later than 30 days after discovery of the emissions. The results of the RM 5 test shall be submitted to SRCAA as soon as possible but no later than 45 days after the testing. If measured emissions exceed the applicable standard, the permittee shall take appropriate and timely corrective action to address the problem.

Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the obligation to report any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations.

[WAC 173-401-615(1) & (2), 9/16/02] [WAC 173-400-050(1), 11/28/13 (2/19/91)] [WAC 173-400-060, (2/19/91)] [WAC 173-400-060, 1/10/05 – STATE/LOCAL ONLY] [WAC 173-400-105(4), 8/20/93] [WAC 173-400-105(4), 11/28/12 – STATE/LOCAL ONLY] NOTE: This is a gapfilling MRRR.

**2M.** The permittee shall meet the requirements given in a) and b), and if triggered, the permittee shall meet the requirements given in c).

- a) The permittee shall perform weekly inspections of the facility during daylight hours while the facility is in operation to verify that each requirement for which this MRRR is specified in the “MRRR Reference” column in the above tables is being met. For permit conditions that require that reasonable precautions be taken or that call for the use of recognized good practices or procedures or effective control apparatus and measures, see 2M.d) below. Records shall be kept of each inspection, including the name of the observer, the date and time of the inspection, and the observations made during the inspection. Records shall be kept in accordance Condition I.D.5- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.
- b) The permittee shall record and investigate complaints received regarding air quality problems. Complaints shall be investigated as soon as possible, but no later than 8 hours of

receipt or by the end of the first regular business day during which the complaint was received, whichever is later. Receipt of a complaint does not, in and of itself, establish a violation. For permit conditions that require that reasonable precautions be taken or that call for the use of recognized good practices or procedures or effective control apparatus and measures, see 2M.d) below. Records shall be kept of each complaint investigation, including the date and time that the complaint was received, the date and time of the complaint investigation, and observations made during the investigation. Records shall be kept in accordance Condition I.D.5- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.

- c) If potential violations of the requirement(s) are observed during the weekly inspections, as part of the complaint investigation, and/or at any other time, the permittee shall take timely and appropriate corrective action. Action shall be considered timely and appropriate if the problem is solved as soon as possible, but no later than 24 hours of first observing the problem. Taking corrective action does not relieve the permittee from complying with the underlying requirement, nor does it relieve the permittee from the requirement to report any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations. Records shall be kept of all correction action(s) taken by the permittee. Records shall be kept in accordance Condition I.D.5- Retention of Records, and, upon request, such records shall be made available for inspection by SRCAA staff or other authorized representatives.
- d) The following are considered to be reasonable precautions; recognized good practices and procedures; and effective control apparatus and measures. Depending on the air quality problem being addressed, it may be necessary to implement one, several, or all of the precautions, practices, and procedures.
  - i. Reasonable precautions to prevent PM or fugitive dust from becoming airborne include, but are not limited to:
    - A. Using water or chemical dust suppressants on PM containing materials prior to and during activities that may release PM into the air. Re-application may be required periodically to maintain effectiveness;
    - B. Minimizing activity during high winds, if the winds are likely to cause the release of PM into the air;
    - C. Using covered chutes, covered containers, and/or PM collection and control equipment when handling, transferring, and/or storing PM containing materials;
    - D. Minimizing the free fall distance, i.e., drop height, of PM containing materials at transfer points such as the end of conveyors, front end loader buckets, loading spouts, etc...
    - E. Maintaining adequate freeboard and/or covering loads when transporting PM containing material;
    - F. Minimizing exposed areas of PM containing materials such as storage piles, graded surfaces, etc... and/or using tarps, chemical dust suppressants, vegetation, etc.. to minimize releases to air;
    - G. Keeping paved surfaces clean to minimize re-entrainment of PM into the ambient air; and/or
    - H. Limit vehicle speed to less than 15 miles per hour on unpaved areas.

- ii. Reasonable precautions to prevent tracking of PM onto paved public roadways include, but are not limited to:
  - A. Paving unpaved traveled surfaces;
  - B. Gravelling unpaved traveled surfaces. Gravel may need to be reapplied periodically to maintain effectiveness;
  - C. Paving or installing quarry spalls<sup>1</sup> at exit aprons;
  - D. Cleaning vehicle tires and undercarriages before exiting to paved public roadways; and/or
  - E. Promptly cleaning material that has been tracked out onto paved public roadways.
- iii. Reasonable precautions to prevent release of air contaminants, other than PM, include, but are not limited to:
  - A. Using materials that decrease air contaminant emissions to the air, e.g., low-VOC materials and/or water based materials;
  - B. Using solvent containing materials with lower vapor pressures;
  - C. Keeping unused or partially used containers of organic solvent containing materials closed, except when in use;
  - D. Cleaning up all spills of organic solvent containing materials upon discovery and keeping the waste materials in closed containers; and/or
  - E. Keeping all disposable materials which contain organic solvents in closed containers.
- iv. Recognized good practices and procedures and effective control apparatus and measures to reduce odors include, but are not limited to:
  - A. Keeping odorous materials in closed containers or confined within a building;
  - B. Using ventilation systems which direct odor bearing gases away from neighboring residences and businesses;
  - C. Using scrubbers or other add-on control equipment to control odors;
  - D. Using materials which release less odorous compounds;
  - E. Disposing of odorous, or potentially odorous, materials promptly; and/or
  - F. Operating and maintaining equipment and processes in a manner that minimizes odors.

[WAC 173-401-615(1) & (2), 9/16/02] – NOTE: This is a gapfilling MRRR

**3M.** Certification that only natural gas and propane (LPG) were used as fuel in all fuel fired equipment during the reporting period, shall demonstrate compliance with this requirement.  
[WAC 173-401-615(1) & (2), 9/16/02]

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<sup>1</sup> A quarry spall, aka rock entrance, is a buffer area consisting of very large aggregate, usually 4 to 8 inch crushed rock, which jars material free from tires and undercarriages.

**4M.** The Swindell Dressler tunnel kiln shall be serviced on a regular basis to assure proper combustion is occurring and that the units are in proper operating condition. At a minimum, the service shall include daily inspections of burners, fans and controls, monthly cleaning of burners, monthly checks of gas to air ratios and monthly checks of gaskets and seals. If deterioration, sufficient to affect proper combustion is found, i.e., parameters or conditions are outside of normal ranges of operation, corrective action shall be taken by the end of the next working day. The permittee shall maintain records of each service check. At a minimum, the records shall include the dates of each service check, the unit being checked, a brief description of the findings, a description of any corrective action taken, and any other information required in Condition I.D.1- Records of Required Monitoring Information. The records shall be kept in accordance with Condition I.D.5-Retention of Records, and, upon request, shall be made available for inspection by SRCAA staff or other authorized representatives. [WAC 173-401-615(1) & (2), 9/16/02]

**5M.** The permittee shall follow the approved hammermill operation plan, as revised on August 25, 2004, or a subsequent SRCAA approved revised plan. All revisions to the plan shall be approved by SRCAA prior to implementation.

Per the approved operation plan, the monitoring given in a. and b. shall occur at least once per clay type (when two or more types of clay are processed through the hammermill in one day) and at least twice per day (when only one type of clay is processed through the hammermill in one day):

- a. Visible emission readings at the hammermill (including any transfer points on the two conveyor belts) shall be taken and recorded by observers using EPA Method 22. The permittee shall take the following corrective actions whenever visible emissions are observed:
  - i. Whenever any visible emissions are observed from the hammermill (including any transfer points on the two conveyor belts) using EPA Method 22, the permittee must immediately increase the amount of water added prior to the hammermill; and
  - ii. After the permittee increases the amount of water added prior to the hammermill, if visible emissions are still observed, using EPA Method 22, visible emission readings must be taken by a certified Method 9 observer. If visible emissions exceed the applicable opacity standard for the hammermill, the hammermill must be shut down immediately.
- b. Measurements or estimates of the moisture content of the clay being processed through the hammermill shall be recorded.

All records required in the plan shall be kept in accordance with Condition I.D.5-Retention of Records, and, upon request, shall be made available for inspection by SRCAA staff or other authorized representatives. [NOC #845, Condition 2, 9/10/97 as revised on 7/23/02] [WAC 173-401-615(1) & (2), 9/16/02]

**6M.** The proponent shall keep monthly records of the total tons of clay and clay products processed through the hammermill and report the total annually on the emission inventory forms submitted pursuant to Condition I.D.8-Emission Inventory. [NOC #845, Condition 5, 9/10/97 as revised on 7/23/02]

**7M.** In addition to any records required in Condition I.D.1-Records of Required Monitoring

Information, the following records shall be kept in accordance with Condition I.D.5-Retention of Records:

- a. The occurrence and duration of any startup, shutdown, or malfunction in the operation of the hammermill or two conveyor belts;
- b. Monthly records of the total tonnage of fired products in the tunnel kiln and periodic kilns. By the 15<sup>th</sup> after the end of each month, the tonnage of fired products in the tunnel kiln and periodic kilns shall be totaled for the past 12 months.
- c. Performance test measurements and results, all other information required in 40 CFR Part 60, and all records required in Condition 5M of this permit.

[NOC #845, Conditions 5 & 8, 9/10/97 as revised on 7/23/02] [40 CFR § 60.7(b) & (f),1996]  
[WAC 173-400-115, 11/28/12]

**8M.** A monthly inspection shall be performed to check that water is flowing to spray nozzles in the wet suppression systems associated with the crusher. If water is not flowing properly during an inspection, corrective action must be initiated within 24 hours and completed as expediently as practical. Records shall be kept of each inspection of the wet suppression system in a logbook, including the date of each inspection and any corrective actions taken. The logbook must be kept on-site in accordance with Condition I.D.5 and made available to SRCAA and EPA upon request.

[WAC 173-401-615(1) & (2), 9/16/02] – NOTE: This is a gapfilling MRRR

**9M.** An operation and maintenance (O&M) plan shall be developed for all crushing equipment, including all dust suppression systems. Once developed the O&M plan shall be followed. The most recently developed O&M plan is acceptable, provided the plan includes the information described in Conditions a – e below. The O&M plan shall include the following:

- a. Normal operating parameters for the crushing equipment (manufacturer O&M plans/manuals are generally acceptable.);
- b. The proper procedures to be used to ensure that particulate emissions to the air are minimized during any phase of the operation;
- c. A preventative maintenance schedule;
- d. Operating parameters that are monitored during equipment operation; and
- e. Drawings or a written description of the dust suppression system, including types, number, and locations of dust suppression equipment (i.e. fog nozzles).

A copy of the O&M plan shall be kept on site and made available to SRCAA staff upon request. Records shall be kept on all monitoring and maintenance activities performed on the crushing equipment, including the dates and nature of the monitoring and maintenance activities. The monitoring and maintenance records shall be retained on site in accordance with Condition I.D.5 and made available to SRCAA personnel upon request.

[NOC #1495, Condition 4, 9/22/10]

**10M.** Records shall be kept on-site of the total weight of brick crushed each calendar year.

Records shall be kept in accordance in Condition I.D.5 and made available to SRCAA personnel upon request.

[NOC #1495, Condition 9, 9/22/10]

### III. PERMIT SHIELD

#### A. INAPPLICABLE REQUIREMENTS

The requirements listed in this section do not apply to the source, or to the specific emission units specified below. The permit shield applies to all requirements so identified. Citations to requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation. [WAC 173-401-640(2), 10/4/93]

**1PS. Registration issuance.** WAC 173-400-101 requires certain air contaminant sources to register with the appropriate air pollution control authority. This section specifically exempts air operating permit sources from the requirement to register in WAC 173-400-101(7). Because the permittee is an air operating permit source, the rule does not apply. [WAC 173-400-101, 3/1/11 - STATE/LOCAL ONLY]

**2PS. Registration.** SRCAA Regulation I, Article IV requires that certain air contaminant sources register with SRCAA. The registration requirement is established pursuant to RCW 70.94.151. State law, RCW 70.94.161(17), exempts air operating permit sources from registration programs established pursuant to RCW 70.94.151. Because the permittee is an air operating permit source, the rule does not apply. [SRCAA Regulation I, Section 4.01 & 4.02, 2/1/07 - STATE/LOCAL ONLY]

**3PS. Standards for control of particulate matter on paved surfaces.** SRCAA Regulation I, Section 6.14 applies to any state, county, city, or local government that applies sanding materials to or mechanically sweeps or vacuums paved surfaces within the Spokane PM10 Nonattainment area. Because the permittee is not located in the Spokane PM10 Nonattainment area, the rule does not apply. [SRCAA Regulation I, Section 6.14, 5/3/07(2/13/99)\* - see note on page 5]

**4PS. Standards for control of particulate matter on unpaved roads.** SRCAA Regulation I, Section 6.15 applies to governmental entities responsible for the maintenance of unpaved roads within the Spokane PM10 Nonattainment area. Because the permittee is not a governmental entity, the rule does not apply. [SRCAA Regulation I, Section 6.15, 5/3/07(2/13/99)\* - see note on page 5]