

302 Pine Street, #207

Mount Vernon, Washington 98273

Area Code 206: Mount Vernon 428-1617

Scan 542-1617

December 7, 1990

Wayne Bratz, Bellingham Terminal Manager  
Tilbury Cement Co.  
P.O. Box 37  
Bellingham, WA 98225

ORDER OF APPROVAL TO CONSTRUCT

Dear Mr. Bratz:

We have evaluated your "Notice of Intent to Operate and Application for Approval" received at our office on November 28, 1990 to build and operate a clinker transfer facility. Your application was reviewed to determine if your proposal complies with Northwest Air Pollution Authority Regulation 300 and 173-403 WAC.

Authorization to proceed with construction for temporary use is granted subject to the following conditions:

1. The facility is constructed and operated in accordance with the information contained in the application.
2. Water mist dust control shall be installed and operated at clinker transfer points
3. A street sweeper shall be used on entry roads as necessary to prevent visible dust emissions from roadways.
4. A water wash or equivalent system shall be used to prevent trucks from tracking material onto public roads in sufficient quantities to cause visible dust emissions.
5. Visible dust emissions shall not be allowed from any point at the clinker loading facility.
6. Notice must be given to NWAPA at least 48 hours in advance each time the transfer facility is used.
7. Tilbury Cement shall comply with all requirements from other agencies having jurisdiction over the proposed project.
8. This authorization will expire on June 1, 1990. 1991. *Jfm* 12/11/90

Representing Island, Skagit and Whatcom Counties

BOARD OF DIRECTORS

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Whatcom County

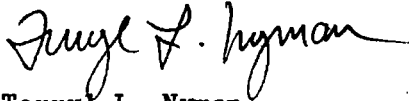
Delmon Anderson, Cities & Towns, Island County  
Kelley Moldstad, Cities & Towns, Skagit County

Richard Flickinger, Member at Large  
Terry L. Nyman, Air Pollution Control Officer

Wayne Bratz  
Tilbury Cement  
December 7, 1990  
Page 2

Please call me if you have any questions about the above requirements. I have enclosed a billing for \$250 filing and review fee as per Section 324.

Sincerely,

A handwritten signature in cursive script, appearing to read "Terry L. Nyman".

Terry L. Nyman  
Air Pollution Control Officer



1600 South Second Street  
Mount Vernon, WA 98273-5202  
ph 360.428.1617  
tel 800.622.4627  
fax 360.428.1620

Original Issuance: April 25, 1996

Revision a: December 8, 2011

**Northwest Clean Air Agency (NWCAA) hereby issues  
Order of Approval to Construct (OAC) #587a**

**Project Summary:** Construct and operate a 200,000 ton per year air separator, located at the exit of the finish mill.

**Approved Emission Units:**

- One (1) 200,000 ton per year air separator and fabric filtration system

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Lehigh Northwest Cement Company  
741 Marine Drive  
Bellingham, WA 98225  
NOC Contact: Wayne Bratz

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Lehigh Northwest Cement Company  
741 Marine Drive  
Bellingham, WA 98225

**FACILITY LOCATION:**

741 Marine Drive, Bellingham, WA 98225

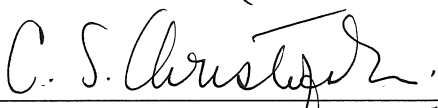
**Permit History**

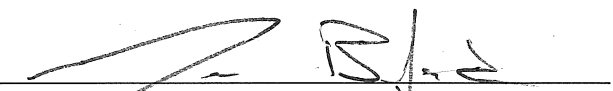
- As of the date of issuance, this Order supersedes NWCAA OAC#587 dated April 25, 1996.

**As authorized by Northwest Clean Air Agency Regulation Section 300, this order is issued subject to the following restrictions and conditions<sup>1</sup>:**

1. The project shall be constructed and operated in accordance with the information submitted in the Notice of Construction and Application for Approval.
2. Visible emissions from the air separator shall not exceed ten percent opacity for more than six aggregate minutes in any sixty minute period as determined by Washington State Department of Ecology Source Test Method 9B.
3. Total particulate emissions from the fabric filtration system shall not exceed 0.02 gr/acf.
4. Maintain and operate the air separator and fabric filter in accordance with operation and maintenance manuals that are kept on site and made available to NWCAA personnel upon request.

5. The finish mill shall not be operated unless it is vented to the air separator and fabric filtration system to control particulate emissions.
6. A mechanical gauge shall be installed and maintained to continuously monitor the static pressure differential across the fabric filtration system.
7. Dust collected by the fabric filter shall be discharged only into closed containers.

  
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Christos Christoforou, P.E.  
Engineer

  
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Mark Buford, P.E.  
Assistant Director

Revision a: OAC cleanup including removal of conditions 1, 2, and 8 and revising remaining conditions for clarity.

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<sup>i</sup> Nothing in this permit is intended to, or shall, alter or waive any applicable law [including but not limited to defenses, entitlements, challenges or clarifications related to the Credible Evidence Rule , 62. Fed. Reg. 8315 (Feb. 27, 1997)] concerning the use of data for any purpose under the Act, generated by the reference method specified herein or otherwise.



1600 South Second Street  
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 www.nwcleanair.org

Original Issuance: December 12, 2005

Revisions: none

**Northwest Clean Air Agency (NWCAA) hereby issues  
 Order of Approval to Construct (OAC) #931**

**Project Summary:** Two dust collectors that are in a state of disrepair are being replaced with new BHA, 2,900 cfm, single cell, pulse-jet, fabric filtration dust collectors. Dust Collector ID#0001 will be used to control particulate emissions when unloading flyash from railcars. Dust collector ID#0002 will control particulate emissions when loading trucks with flyash or cement from a new buff tank.

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Wayne Bratz, Plant Manager  
 Lehigh Northwest Cement Company  
 P.O. Box 37  
 Bellingham, WA 98227

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Lehigh Northwest Cement Company  
 P.O. Box 37  
 Bellingham, WA 98227

**FACILITY LOCATION:**

741 Marine Drive, Bellingham, Washington  
NWCAA Registration Number: 007-EM02-W


**Best Available Control Technology (BACT)** for the particulate matter associated with cement and flyash handling are dust collectors using fabric filtration achieving 99.99% control efficiency as demonstrated by the manufacturer's guarantee.


**As authorized by Northwest Clean Air Agency Regulation Section 300, this order is issued for operation of dust collectors #0001 and #0002 subject to the following restrictions and conditions:**


1. Particulate emissions generated during the unloading of flyash from railcars and when loading trucks from the buff tank shall be controlled by dust collectors #0001 and #0002, respectively.
2. Visible emissions;
  - a. From the dust collector stacks shall not exceed five-percent (5%) opacity for more than three minutes in any consecutive sixty-minute period as determined by Washington State Department of Ecology Method 9A.

- b. There shall be no visible fugitive emissions from the dust collectors or the processes controlled by the dust collectors, except during maintenance activities. During maintenance activities, all reasonable precautions shall be taken to prevent the release of fugitive particulate matter.
    - c. Weekly qualitative observations of the dust collectors shall be conducted to assure that there are no visible emissions from the dust collector stacks or any fugitive emissions from the processes served by the dust collectors.
    - d. All visual observations taken to comply with this condition shall be recorded in a written log that includes the results of the observation, the emission unit observed, the time and date of the observation, and the name of the person taking the observation.
    - e. There is no requirement to take visual emission observations on a dust collector that does not operate during a particular calendar week.
  3. Differential pressure drop across the dust collector;
    - a. A differential pressure gauge shall be installed on each dust collector that continuously measures the differential pressure drop across the collector's fabric filtration system.
    - b. An acceptable differential pressure drop range shall be established for each dust collector that is based on the manufacturer's recommendations and/or good engineering judgment, and posted next to the gauge.
    - c. Weekly readings of the differential pressure drop readings shall be taken on each dust collector to assure it is operating within the acceptable range.
    - d. All readings taken to comply with this condition shall be recorded in a written log that includes the differential pressure drop reading, the dust collector it was taken on, the time and date of the reading, and the name of the person taking the reading.
    - e. There is no requirement to take differential pressure drop readings on a dust collector that does not operate during a particular calendar week.
  4. Excess Emissions;
    - a. If, at any time, the differential pressure drop of a dust collector is found to be outside the acceptable range established under condition 3, or there are visual emissions observed, the affected emission unit shall be immediately shut down until the problem has been identified and corrected.
    - b. A written log shall be made for of any excess emissions event identified by this condition. This log shall describe the event, the date and time it occurred, and the name of the person taking the corrective action.
  5. A written operation and maintenance (O/M) manual for the dust collectors shall be developed and kept up-to-date. The O/M manual shall be consistent with the manufacture's recommendations and shall include a record of the acceptable pressure drop across the fabric filtration system established pursuant to condition 3.

6. The facility shall keep a written log of all maintenance and repair work performed on the dust collectors. The log shall include, at minimum, all external and internal inspections, any fan or fabric filtration failures, repairs or replacements, the time and date that each activity was performed, and the name of the person performing the work.
7. Records required by this OAC shall be maintained on site for a period of no less than three years and shall be readily available for inspection by the NWCAA.

  
Dan Mahar, PE  
Permitting Engineer

  
Lynn Billington, PE  
Reviewing Engineer

  
James Randles  
Director



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Original Issuance: September 6, 2016

**Northwest Clean Air Agency (NWCAA) hereby issues  
 Order of Approval to Construct (OAC) 1251**

**Project Summary:** Replace two existing baghouses with two new baghouses manufactured by Camfil, equipped with bags rated at 0.005 gr/dscf, and 7,500 cfm each.

**Approved Emission Units:**

- Loading/unloading of cement from two rows of five silos each. Emissions from the cement silos are controlled by the two Camfill baghouses.

Owner/Operator	Facility Name and Location
Lehigh Northwest Cement Company 741 Marine Drive Bellingham, WA 98225 Contact: David Parsons, Manager	Lehigh Northwest Cement Company 741 Marine Drive Bellingham, WA 98225

**Issuance of this Order is authorized by Northwest Clean Air Agency Regulation Section 300. The owner/operator must comply with the following restrictions and conditions<sup>1</sup>:**

- (1) Discharge the exhaust from the baghouses through unobstructed stacks at least 75 feet above grade.
- (2) At no time cause or allow the dust collection systems in the cement silos building to bypass the baghouses while loading or unloading of cement in the silos is taking place.
- (3) Do not cause or allow visual emissions from either baghouse stack to exceed 0% opacity for more than three aggregate minutes in any sixty-minute period as determined by the Washington State Department of Ecology Method 9A.
- (4) Do not cause or allow particulate emissions from either baghouse to exceed 0.005 grains per dry standard cubic foot (gr/dscf) of exhaust gas.
- (5) Demonstrate compliance with Conditions 3 and 4 of this Order by an initial source test on one of the two baghouses conducted no more than 90 days after startup. Conduct testing while the dust collection systems and baghouses are in operation. Conduct


<sup>1</sup> Nothing in this permit is intended to, or shall, alter or waive any applicable law [including but not limited to defenses, entitlements, challenges or clarifications related to the Credible Evidence Rule, 62 FR 8315 (Feb. 27, 1997)] concerning the use of data for any purpose under the Act, generated by the reference method specified herein or otherwise.

Pursuant to Section 300.10 of the NWCAA Regulation and chapter 43.21B RCW, this Order may be appealed to the Pollution Control Hearings Board (PCHB). To appeal to the PCHB, a written notice of appeal must be filed with the PCHB and a copy served upon the NWCAA within 30 days of the date the applicant receives this Order. Additional information regarding appeal procedures can be found at: <http://www.eluho.wa.gov/> under PCHB.



testing in accordance with 40 CFR 60 Appendix A, Method 5 or other test method approved in advance by the NWCAA, and in accordance with Section 367 and Appendix A of the NWCAA Regulation.

- (6) Equip the baghouses with filtration media capable of providing particulate emissions that do not exceed 0.005 grains per dry standard cubic foot (gr/dscf) of exhaust gas. Demonstrate compliance with this condition by maintaining a record of the type of filter media installed in each baghouse and documentation of its fractional control efficiency.
- (7) Install a pressure differential gauge on each baghouse that continuously measures the differential pressure across the filter media. Establish an acceptable differential pressure range for the baghouses that is based on the manufacturer's recommendations and/or good engineering judgment. Post the acceptable range on, or near each baghouse, and operate the baghouses within this range.
- (8) Once per operating week check and record the differential pressure of each baghouse. If either baghouse is operating outside the acceptable range, shut down that baghouse immediately and do not resume operation until you have identified and corrected the problem. Record a description of each corrective action taken to comply with this condition, including the date, time and person making the record.
- (9) Maintain and operate the baghouses in accordance with the manufacturer's specifications and associated operation and maintenance manuals. Keep a copy of the operation and maintenance manual for the baghouses on-site and readily available for review by the NWCAA. Record all maintenance activities performed on the baghouses in a maintenance log including a description of the maintenance activity, the date it was completed and person recording the activity.
- (10) Keep records required by this Order onsite for no less than three years from the date of generation, and make them readily available for review by the NWCAA.

  
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Christos Christoforou, P.E.  
Engineer

  
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Agata McIntyre, P.E.  
Engineering Manager