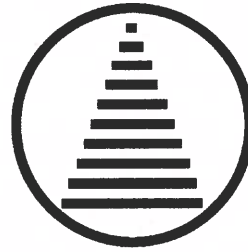


Traci \_\_\_\_\_ Michele \_\_\_\_\_ Scanned \_\_\_\_\_  
Christos \_\_\_\_\_ Crystal \_\_\_\_\_ Dan \_\_\_\_\_  
Jason \_\_\_\_\_ Lyn \_\_\_\_\_ Robyn \_\_\_\_\_  
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Mark \_\_\_\_\_ Agata \_\_\_\_\_ Toby \_\_\_\_\_  
Other: \_\_\_\_\_  
Rtn to: \_\_\_\_\_



**CHEMCO**

April 7, 2020

**RECEIVED**

Attention: Ms. Agata McIntyre  
Northwest Clean Air Agency  
1600 South Second Street  
Mount Vernon, WA 98273-5202

APR 11 2020

**NORTHWEST  
CLEAN AIR AGENCY**

**RE: Title V Operating Permit Renewal Application for Chemco, Inc. 4191  
Grandview Rd. Ferndale, WA**

Dear Ms. McIntyre,

As required by the NWCAA and the Washington Administrative Code 173-401-710(1), please find attached the Title V Operating Permit Renewal Application for Chemco, Inc. located in Ferndale, Washington.

Due to the outbreak of COVID-19 and CEO Fred Amundson health issues he must remain in quarantine in California and is unable to sign Chemco, Inc. AOP Renewal Application. A copy has been sent for his signature. As soon as it is returned it will be submitted to NWCAA.

If you have any questions regarding the Title V Operating Permit Renewal Application, please feel free to contact me at (360) 366-3500 or [ddalry@chemco.org](mailto:ddalry@chemco.org)

Sincerely,

Darin Dalry  
General Manager  
Chemco Inc.

# Chemco Inc. Title V Air Operating Permit Renewal Application

April 7, 2020

## Application Elements:

### Part 1: General Information

### Part 2: Process and Emissions Information

### Part 3: Applicable Requirements

Attachment A – Inapplicable Requirements

### Part 4: Compliance Plan and Certification

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## Part 1: General Information

### WAC 173-401-510(2)(a)

Company name and address [or plant name and address if different from the company name] :

**Chemco Inc.  
4191 Grandview Rd.  
Ferndale, WA 98248**

Responsible Official name and address:

**Fred Amundson  
CEO Blue Heron Properties  
4191 Grandview Road  
Ferndale, WA 98248**

Owner's name and agent:

**Blue Heron Properties  
4191 Grandview Rd.  
Ferndale, WA 98248**

Telephone number and name of plant site manager/contact:

**Darin Dalry  
General Manager  
(360) 366-3500**

Current AOP number and expiration date:

**020R1 April 19, 2021**

Were there any changes to the facility impacting air emissions since receiving the current Air Operating Permit? [if yes, please describe changes]

**Chemco, Inc. continues to operate the Fire-Retardant treatment facility and the Fire-Retardant resin manufacturing facility.**

**Cleaver Brooks CBLE-700-300-150ST 300hp natural gas fire boiler with flue gas recirculation (FGR) and low NOx burner with a maximum heat input capacity of 10 MMBtu/hour, OAC 1271 installed in 2017**

**New Wood hardening operation was issued under OAC 1295, July 2018. As of January 2020, the treating plant constructed to produce the hardened wood products has not operated. The company that Chemco partnered with to product the hardened wood has shelved the project indefinitely. If Chemco determines another use for the treating system Chemco will notify the NWCAA before any production commences.**

## Part 2: Process and Emissions Information

### WAC 173-401-510(2)(b)

- Will there be any changes to the operating scenario(s) identified in the current AOP?  
**None, unless the wood hardening operation under AOC 1295 comes on-line.**
- Description of process and products by Standard Industrial Classification (SIC) Code.

#### **Primary Business Activity**

**SIC Code: 2491 Wood Preserving NAICS: 321114 Wood Preservation-  
Application of fire retardant and hardening chemicals to milled wood products.**

**Note- Chemco manufactures fire retardant on-site. This activity is classified under SIC 2899  
Chemicals and Chemical Preparations, Not Elsewhere Classified and NAICS 325998 All Other  
Miscellaneous Chemical Product and Preparation Manufacturing.**

### WAC 173-401-510(2)(c)(i) through (iv)

- List of pollutants that would cause the facility to be classified as a "major source" as defined in WAC 173-401.

**Methanol (Hazardous Air Pollutant)– Potential to Emit greater than 10 tons per year.  
VOC (composed of methanol)- Potential to Emit greater than 100 tons per year.**

- Identification and description of all points of emissions at the facility except those that qualify as insignificant emission units or activities as defined in WAC 173-401-530. Are these emissions units correctly identified and defined in the current AOP? If not, please note the requested changes below.

**Yes**

- List and quantification of all emissions of regulated air pollutants from the emission points identified above (including supporting calculations). If the most recent annual emissions inventory accurately describes these emissions, it is not necessary to repeat the same information here. Please refer the NWAPA to the most recent annual emissions inventory.
- List of the fuels used and their respective usage rates at design capacity for the emission points.
- List of the raw materials used and their respective usage rates at design capacity.
- List the production rate at design capacity for the emission points.

**Please see Chemco, Inc. 2019 emissions inventory.**

- Identification of the facility operating schedule (anticipated operating hours per day, days per week, weeks per year)

**Normal operation: 8 hrs/day, 5 days/wk, 52 wks/yr**

### WAC 173-401-510(2)(c)(v) through (viii)

- Identify all air pollution control equipment at the facility.

#### **Batch Reactor:**

**Emissions from the Batch Chemical Reactor are vented to a wet scrubber.**

#### **Tanks – T101:**

**Emissions from Tank T-101 are vented to a wet scrubber**

- Identify and describe all compliance monitoring devices or activities at the facility.

**Chemco utilizes Leak Detection and Repair (LDAR) to comply with 40 CFR 63 Subpart FFFF (miscellaneous organic chemical MACT). Chemco uses periodic inspections to monitor compliance with other applicable requirements.**

- Identify any limitations on source operation that affect emissions of a regulated pollutant. Similarly, list any work practice standards that affect emissions of a regulated pollutant at this facility.

**Facility operations are limited by the capacity of the equipment and market conditions. Please reference the information above and the emissions inventory documents for additional information.**

### **Part 3: Applicable Requirements**

#### **WAC 173-401-510(2)(d)**

- Cite and describe all applicable requirements.

**See applicable requirements in current Chemco Air Operating permit dated April 19, 2016**

- List any applicable test method(s) for determining compliance with each applicable requirement listed in item 19 above.

**See current Chemco Air Operating permit NO. 020R1 dated April 19, 2016 and 2019 Annual Compliance Certification.**

#### **WAC 173-401-510(2)(f)-(g)**

- Does the applicant propose any exemptions from an otherwise applicable requirement? If so, please explain.

**No exemptions requested**

- Does the CAM rule (40 CFR Part 64) apply to any of the emissions units?

**No**

- Does the accidental release prevention regulation (40 CFR Part 68) apply to the facility?

**No**

- Do the federal Acid Rain rules (40 CFR parts 72-78) apply to any of the emissions units?

**No**

- Are there any requested changes to any condition in the current Air Operating Permit? [if yes, identify the condition, the requested change, and the reason]

**Remove and replace boiler information to reflect new boiler installed in 2017 with updated compliance conditions.**

#### **WAC 173-401-510(2)(k)**

- If the applicant would like to request that the permit shield be extended to cover certain requirements that the applicant believes are inapplicable, please list those requirements, below. Please include a brief narrative description of each requirement and the basis for the belief that each is inapplicable.

**Please refer to Attachment B, Section 5 – Inapplicable Requirements from original AOP application. Please extend the permit shield to these listed inapplicable requirements.**

## **Part 4: Compliance Plan and Certification**

### **WAC 173-401-510(2)(h) and (i)**

- Description of the compliance status of the facility with regard to all applicable requirements.

**Please see 2019 Annual Compliance Certification submitted to NWCAA**

- Provide the following:

For applicable requirements with which the source is in compliance, provide a statement that the source will continue to comply with such requirements.

**For applicable requirements with which Chemco Inc. complies, Chemco Inc. will continue to comply with such requirements**

- For applicable requirements that become effective during the permit term, provide a statement that the source will meet such requirements on a timely basis;

**For applicable requirements that will become effective during the permit term, Chemco Inc. will meet such requirements on a timely basis.**

- For applicable requirements with which the source is not in compliance at the time of permit issuance, provide a narrative description and provide a schedule of compliance. Such a schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the source will be in noncompliance at the time of permit issuance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. For sources required to have a schedule of compliance to remedy a violation, provide a schedule for submission of certified progress reports every six months or at a more frequent period if specified in an applicable requirement;

**Chemco will submit in a timely manner any additional information required to issue the facility air operating permit. Chemco will submit certified progress reports every six (6) months or at a more frequent period specified by NWCAA until the aforementioned compliance issues are remedied.**

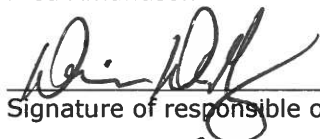
- Compliance Certification:

**During the permit term Chemco will submit required compliance certifications annually or more frequently if specified by the underlying applicable requirement.**

**Statement of Certification:** *Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.*

Fred Amundson

CEO



4/7/2020

Signature of responsible official

Date

SIGNED FOR FRED AMUNDSON