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# Notice of Construction Technical Worksheet

NOC No. 1381	Source: Westland Distillery Rackhouse 11281 Jensen Lane Burlington, WA 98223 NOC Contact: Melanie Gourley melaniegourley@westlanddistillery.com
Permit Engineer: Christos Christoforou	
NOC Received: 01/05/2022	NWCAA No.: 2270

## A. Project Description

Facility for storing/maturing spirits. 2 rackhouses already constructed, 1 in construction - each with capacity for approximately 4700 53-gallon barrels (barrel size varies).

According to SEPA, in the future the facility may be receiving grains for fermentation but that is more than 5 years in the future.

## B. New Source Review (NSR) Fees

NWCAA NSR fees have been assessed in accordance with the NWCAA fee schedule. The NSR fees assessed and amount paid are listed in the NSR Fee Worksheet posted on the OAC Whiteboard for this project. The total is \$2,011, and the invoice is dated 2/1/22. The fees were paid in full on March 22, 2022.

## C. Public Notice

In accordance with NWCAA Section 305.1, an internet notice that the NWCAA received this NOC application and/or OAC revision request was posted on the NWCAA website for a minimum of 15 consecutive days ending on 01/20/2022. No comments nor requests for further review received.

Formal public involvement and notification (i.e., comment period and/or hearing) **is** required for this project because the project review does meet one of the criteria set forth in NWCAA 305.2: more than 40 tpy of VOC.

## D. SEPA Review

State Environmental Policy Act (SEPA) review under NWCAA Section 155 is addressed as follows.

Skagit County Planning and Development Services is the SEPA lead agency for this project and issued the associated MDNS on 1/28/2020. A copy of this MDNS is included in the OAC file. This OAC is being issued after the date that the MDNS became final. This OAC relies on the MDNS issued by Skagit County.

### **GHG Disclosure and Mitigation**

There are no greenhouse gas (GHG) emissions as a result of this project.

### **E. Permit History**

This is the first permit for the facility.

### **F. Basis for New Source Review Applicability**

An emission factor for aging of distilled spirits is found on Table 9.12.3-1 of AP-42: 6.9 lb of ethanol per barrel per year. This factor is confirmed by the applicant, who stated that approximately 1 gallon per year is lost to evaporation from a 53-gallon barrel.

The PTE for the facility based on a maximum capacity of 14,100 barrels is 48.6 tons per year. Since ethanol is a VOC<sup>1</sup>, the facility is subject to permitting according to NWCAA 300.4(D)(5).

### **G. Criteria Air Pollutant Emissions and Impacts**

The permit will not have any limitation on the number of barrels that may be stored in the warehouse other than the 14,100 barrels that is designed for, so the as-permitted emissions of VOC will be 48.6 tons per year.

Since there is no ambient standard for VOC, no further analysis is carried out.

### **H. Toxic Air Pollutant Emissions and Impacts**

There are no TAP emissions associated with this project. Ethanol, the only pollutant emitted, is not a toxic air pollutant.

### **I. Prevention of Significant Deterioration (PSD) Program**

Emission increases associated with this project were reviewed for Prevention of Significant Deterioration (PSD) Program applicability.

The facility not an existing PSD major source and this project doesn't make the facility a PSD source. Hence, a PSD permit isn't needed.

### **J. Air Operating Permit (AOP) Program**

After consideration of emission increases associated with this project, the Title V Air Operating Permit (AOP) program applicability for the entire source has been reviewed.

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<sup>1</sup> See definition of VOC in 40 CFR Part 51.100(s)

The facility is not a Title V air operating permit source because post project PTE remains below Title V applicability thresholds and criteria. The source is considered a “**natural minor**”.

### **K. NWCAA Compliance Database (Stratus)**

The **NWCAA Stratus database has been updated** to include the emission unit(s) approved by this OAC.

### **L. Confidential Business Information (CBI)**

The NOC application does not contain any information deemed by the applicant to be CBI.

### **M. Applicable/Inapplicable Regulations**

Relevant sections of NWCAA, state and federal regulations as they relate to the approved emission units listed in the OAC.

#### **1. Northwest Clean Air Agency**

NWCAA 530 contains general requirements for nuisance.

NWCCA 535 contains general requirements for odor control.

#### **2. State**

WAC 173-400 contains requirements similar to those listed above.

#### **3. Federal**

None

### **N. Best Available Control Technology (BACT) Technology Review**

I have contacted John Fuss (Department of Environment and Conservation, TN) regarding possible controls for a facility such as this. His response is below.

*Hello, that is interesting timing as we were just examining a case recently. In EPA region IV, we have received the attached determination from 1994 and have been following the written Division guidance ever since. Maturation warehouses in Tennessee have not been required to install any capture and control configurations to this point. I'm also not aware of any cases in other states to require capture and control at similar sources.*



*John Fuss* | *Environmental Manager 3*  
[Division of Air Pollution Control](#)

Work practice standards (keep doors of the storeroom closed when not actively delivering or removing barrels of spirits) is deemed to be BACT for this facility.

**O. Basis for OAC conditions**

- (1) Nuisance Odor
- (2) Work practice standards (BACT)

**P. Timeline and Review**

<b>Timeline</b>		<b>Date</b>
NOC Received		1/5/2022
NOC Incompleteness Determined (due 30 days from receipt)		1/28/2022
NOC Completeness Determined		3/25/2022
Final Decision Due (due 60 days from complete)		
Final OAC issued		
<b>Review</b>		<b>Date</b>
NWCAA Engineering	Agata McIntyre	4/1/22
NWCAA Compliance		
Source		

**Q. Correspondence**

**1/1/10 Who and How (email, telcon, meeting)**

What