northwest Clean Air agency
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Regulatory Order Worksheet

RO No. **52**	**Source:** Post Point Wastewater Treatment Plant 200 McKenzie St Bellingham, WA 98225-7039
Permit Engineer: **Agata McIntyre**	
Application Received: **10/9/2024**	NWCAA No.: 1318

A. Project Description

RO-52 provides a voluntary limit requested by Post Point to limit Carbon Monoxide (CO) air emissions from the two sewage sludge incinerators (SSI) at the Post Point Wastewater Treatment Plant (Post Point or "the facility"). RO-52 includes conditions to uphold this limit, consistent with the requirements of NWCAA 121.7, NWCAA 104.1 and WAC 173-400-091. RO-52 does not approve any new air pollution emitting equipment.

After RO-52 is issued, it will serve as a federally enforceable limit to keep the facility out of the Prevention of Significant Deterioration (PSD) program. Emissions of CO will also be held below the level at which an Air Operating Permit (AOP) is normally needed. However, for this facility, an AOP will still be required because the facility operates municipal SSI. Federal rules require an AOP for municipal SSI regardless of facility emissions.

RO-52 is being processed subsequent to Post Point reporting in their 2023 emission inventory that the facility emitted 259.5 tons of CO from the two incinerators (36.0 tons from SSI #1 and 223.5 tons from SSI #2).

Post Point's incinerators are existing emission units installed in 1974 (SSI #1) and 1994 (SSI #2). Post Point has reported annual CO emissions to NWCAA for years. In all cases prior to 2023, facility-wide CO emissions were reported as well below 100 tpy. After reviewing the 2023 CO emission report, NWCAA began discussions with Post Point staff about how emissions are monitored and calculated. The 2023 emissions were based on CO stack tests conducted on the incinerators in 2023. The 2023 test results were significantly higher than the test results from past years. Subsequent discussions revealed that Post Point doesn't have continuous CO emission monitoring capabilities on the incinerators. Due to the magnitude and potential variability of CO emissions, NWCAA asked Post Point to install continuous CO monitoring and the facility agreed to do so. RO-52 memorializes this agreement by requiring the installation of continuous emission rate monitoring systems (CERMS) on both incinerators. The CERMS will include both concentration (ppm CO) and flow rate monitoring, so that the data can be used to calculate mass emissions of CO. The emission limit in RO-52 will be on a mass basis but the facility is also subject to concentration basis CO limits stemming from federal rules. The CERMS will provide data to show compliance with both concentration and mass CO limits.

In their application for RO-52, Post Point estimated the total potential-to-emit of all stationary equipment other than the incinerators (i.e., emergency generators, water boilers) as less than 10 tons/yr CO.

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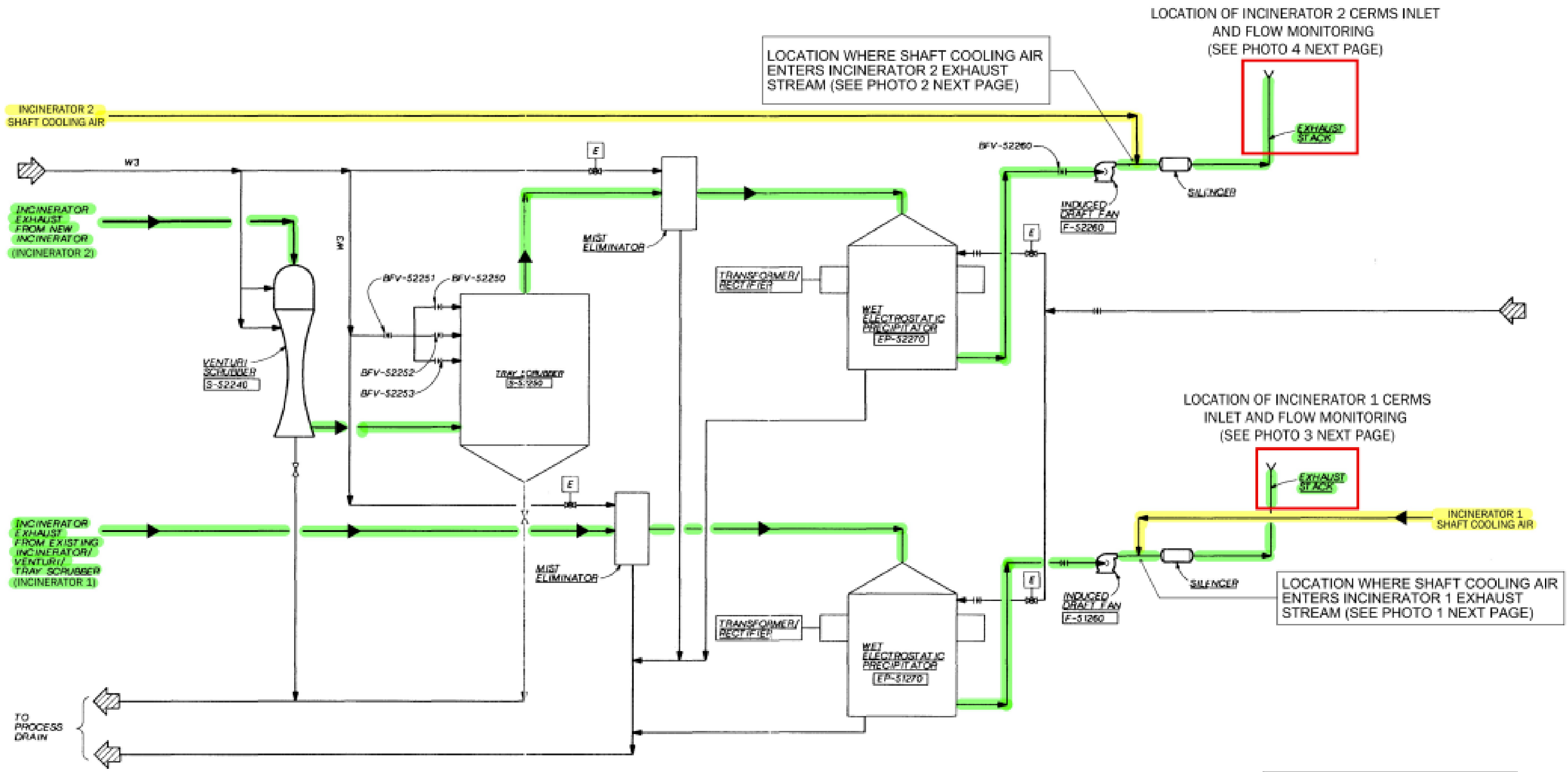
Diagram of proposed CERMS installation location from Steve Bradshaw's 11/12/24 email (email saved as part of permit file)



LEGEND

SHAFT COOLING AIR

INCINERATOR EXHAUST

FIGURE 45-03
SLUDGE INCINERATION EMISSION CONTROL SYSTEM
POST POINT PCP OPERATIONS MANUAL

Summary of CERMS Inlet Location

The Post Point carbon monoxide (CO) Continuous Emissions Reporting and Monitoring Systems (CERMS) inlet will be installed on the incinerator emissions stack approximately 40-feet downstream of the location where the shaft cooling air blends with the incinerator emission stream.

The shaft cooling air is introduced to the incinerator emission stream immediately downstream of the induced draft fan (see Photos 1 and 2 on PDF page 2 of 2). The blended emission stream and shaft cooling air is then conveyed from the lower portion of the stack (within the WESP room) to the upper stack, located on the roof of the WESP building. The upper stack is constructed with flanged ports where the CERMS inlet will be installed. These ports are shown in Photos 3 and 4 on PDF page 2 of 2.

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B. Regulatory Order (RO) Fees

NWCAA RO fees were assessed in accordance with the fee schedule effective January 1, 2024 and an invoice sent. 11/12/24 – payment received. All fees have been paid as of 11/12/24.

C. Public Notice

In accordance with NWCAA Section 305, NWCAA posted an internet notice on its website that the application was received. The notice that an application was received was posted for 15 consecutive days, starting October 10, 2024 on NWCAA's website. No requests for further review or comments were received from the public.

In accordance with NWCAA Section 305.2, certain actions require a mandatory 30-day public comment period before a permit can be issued. While RO-52 will be issued under NWCAA's own regulations, it qualifies for the mandatory public comment because it is also "an Order issued under WAC 173-400-091 that establishes limitations on a source's potential to emit". Therefore, NWCAA will post RO-52 for a 30-day public comment period and to the WA Ecology Permit Register.

Posted to NWCAA's website for 30-day public comment 4/25/25.

D. SEPA Review

NO SEPA NEEDED: Synthetic minor permits that limit facility-wide emissions, without approving any new or modified emitting equipment, are SEPA exempt based on a February 2015 opinion from attorney TC Richmond (excerpt below).

Any order that establishes limitations on a source's potential to emit (WAC 173-400-091; NWCAA Reg 104.1)	Exempt. The synthetic minor determination pertains to the issuance of an air operating permit and is thus also exempt under RCW 43.21C.0381. Applying for this determination is a decision by the source to "opt-out" of the AOP program. The order issued by NWCAA establishes the limitations and conditions for "opting-out" of the AOP program. The fact that the limits (which are to assure that the AOP permit threshold is not triggered) are set forth in a federally enforceable order, rule, or permit condition is not determinative for purposes of SEPA compliance.[6]

E. Permit History

Post Point is an AOP source because it operates SSI. The issuance of RO-52 will not change that.

The incinerators were both issued OACs (OAC 442c – SSI #1, and OAC 287c – SSI #2). These will remain in place, unaffected, by RO-52.

F. Basis for Regulatory Order

NWCAA's authority for this Order comes from NWCAA 121.7, NWCAA 104.1, and WAC 173-400-091.

G. Emissions

RO-52 does not permit the operation of any new emission units.

As noted in Section A, RO-52 will provide a cap on the amount of CO that's allowed to be emitted from the two existing SSI and require the operation of CERMS to measure mass CO emissions from the two existing SSI. RO-52 will also provide methodology for calculating CO emissions based on the data from new CO CERMS.

The two SSI are the only significant sources of CO at Post Point. The facility also has emergency generators and a small gas-fired boiler, but the PTE of all of this other equipment put together is less than 10 tpy. (See application for detailed information.)

Per discussion with Svend Brandt-Erichsen, NWCAA counsel, it's unnecessary to include all the "other" equipment, which together has a PTE of less than 10 tpy, in RO-52 as long as the CO cap for the two SSI combined is set at 90 tpy.

H. Air Operating Permit (AOP) Program

Due to federal regulations (40 CFR 62 Subpart LLL and 40 CFR 60 Subpart LLLL), Post Point is required to obtain an AOP because it operates SSI. This requirement applies regardless of the facility's PTE.

The existing RO-52, which limits facility wide CO emissions, does not change Post Point's AOP status. The AOP is still needed.

I. Prevention of Significant Deterioration (PSD)

In their 2023 emission inventory, Post Point reported emissions that exceeded the PSD major source threshold (250 tons/yr). As noted in section A, this level of reported emission was unprecedented as earlier actual and PTE estimates were well below 250 tons/yr.

Post Point staff indicated that the CO emissions reported in the 2023 EI were based on the previous annual stack test, which showed CO emissions that were significantly higher than in previous tests. Post Point further indicated that the incinerator operation during that test was not representative of normal, day-to-day, operation. This triggered a concern on NWCAA's part about the adequacy of relying on annual tests to monitor CO emissions from the SSI units.

Following the submission and review of the Post Point 2023 EI, NWCAA initiated conversations with Post Point staff about installing continuous monitoring for CO and the need for a synthetic minor limit to cap CO emissions. This resulted in RO-52.

RO-52 will provide a federally enforceable limit of 90.0 tpy for the two SSI, will require continuous monitoring, and will bring the facility-wide CO PTE back down below PSD-major levels.

J. Confidential Business Information (CBI)

The application for RO-52 does not contain any CBI.

K. Description of Permit Conditions

1: Facility-wide CO limit (WAC 173-400-091 & NWCAA 104.1)

2 & 3: Install, operate, calibrate CERMS on SSI 1 and SSI 2 to support compliance demonstration for limit in Condition 1.

4 & 5: Methodology for calculating CO emissions & reporting if exceed thresholds.

6: Recordkeeping in support of RO-52.

L. Correspondence

Permit was reviewed in-house by Toby Mahar, compliance manager, and Svend Brandt-Erichson, legal counsel.

The draft permit was reviewed by Post Point technical staff and their legal team. Final review concluded 4/8/25.

Copies of correspondence are saved with RO-52 review docs in Laserfiche.