Northwest Clean Air Agency (NWCAA) hereby issues

REGULATORY ORDER 52

Project Summary: This Order establishes a limit on the emissions of Carbon Monoxide (CO) from Sewage Sludge Incinerator 1 and Sewage Sludge Incinerator 2.

Owner/Operator	Facility Name and Location	
Post Point Wastewater Treatment Plant	Post Point Wastewater Treatment Plant	
200 McKenzie St	200 McKenzie St	
Bellingham, WA 98225-7039	Bellingham, WA 98225-7039	
	Contact: Steven Bradshaw	

As authorized by Northwest Clean Air Agency Regulation Section 121.7, this Order is issued subject to the following restrictions and conditions:

- 1. Limit air emissions of Carbon Monoxide (CO) from Sewage Sludge Incinerator (SSI) 1 and SSI 2 to less than 9.0×10^1 tons from SSI 1 and SSI 2 combined during any 12 consecutive rolling months.
- 2. On or before June 1, 2025 install a continuous emission rate monitoring systems (CERMS) to measure CO and gas flow from the exhaust stacks of Sewage Sludge Incinerator (SSI) 1 and SSI 2.
- 3. Calibrate, maintain, and continuously operate the CERMS identified in Condition 2 in accordance with 40 CFR 60 Appendix B Performance Specification 4B and 6, 40 CFR 60 Appendix F Procedure 1, Northwest Clean Air Agency (NWCAA) Appendix A Section III, and NWCAA Section 367.
- 4. Within 60 days after installing the CERMS (Condition 2), perform the initial calibration and certification in accordance with Condition 3.
- 5. Beginning on the date this Order is issued and until the CERMS are calibrated and certified (Condition 4):
 - (A) Use plant CO analyzers maintained, calibrated, and operated in accordance with the manufacturer's recommendations, to monitor CO concentrations for SSI 1 and SSI 2 at a location upstream of the manifold where the combustion gas stream and the shaft cooling air are combined.

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(B) Record the mass (pounds) of dry solids fed to SSI 1 and SSI 2 for each hour when dry solids are fed.

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- 6. Within 30 days after the end of each calendar month, calculate monthly CO mass emissions (pounds/month) for that month from SSI 1 and SSI 2. Keep records supporting how calculations were performed. Calculate CO emissions as follows or use alternate methods approved in writing by NWCAA:
 - (A) Before the CERMS are installed and calibrated (Condition 3), for each hour when SSI 1 or SSI 2 operated and sludge was fed:
 - i Calculate pounds of CO emitted per dry standard cubic foot gas (lb/dscf): multiply the hourly average CO concentration (parts per million by volume, dry basis (ppmvd)) from the CO analyzer in Condition 5(A) by 7.26×10⁻⁸.
 - ii Calculate the gas flow rate (dscf/hr): multiply the hourly dry sludge feed rate (Condition 5(B)) by a factor of 600 (dscf/dry pound sludge).
 - iii Calculate CO emissions (pounds/hr): multiply Condition (6)(A)(i) by (6)(A)(ii).
 - iv Calculate CO emission (pounds/month): multiply Condition (6)(A)(iii) by the number of hours the SSI operated while sludge was fed during the month.
 - (B) Before the CERMS are installed and calibrated, for each hour when SSI 1 or SSI 2 operated but no sludge was fed: record gas usage for the month and multiply by the emission factor in Section 1.4 of AP-42.
 - (C) For SSI 1 and SSI 2, after the CERMS are installed and calibrated: Use the CO concentrations and exhaust gas flow rate from the CERMS to calculate hourly CO mass emissions for each hour operated, including standby hours.
- 7. Within 30 days after the end of each calendar month, sum the monthly CO emissions from all stationary emission units (Condition 6) for the previous 12 consecutive rolling month period and compare the total to the limit in Condition 1.
- 8. If the CO emissions from Condition 7 exceed 90% of the limit in Condition 1, submit a written notification to the NWCAA within 30 days of the discovery.
- 9. If the CO emissions from Condition 7 exceed the limit in Condition 1, submit a written notification to the NWCAA within 7 days of the discovery.
- 10. Keep all records created in support of this Order on-site for at least five years and make records readily available to the NWCAA upon request.

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	Attest and Concurrence:		
		_	
POST POINT			Date

Mark Buford NWCAA Executive Director Date