

STATE OF WASHINGTON DEPARTMENT OF ECOLOGY
APPROVAL ORDER

IN THE MATTER OF APPROVING A NEW)
CONTAMINANT SOURCE FOR) **Approval Order No. DRAFT**
LANE MOUNTAIN COMPANY)

TO: Joe Scates
Lane Mountain Company
3119 Highway 231
Valley, Washington 99181

The Silica Production Facility contains the following equipment:

New Equipment:

24,000 acfm baghouse (Donaldson Torit 226RFWH8 AW), reclaimed material dryer hopper, and front-end loader.

Existing Equipment abated by the new Baghouse:

- Screens (DS1, DS2, DS3, DS5, DS6, DS7, DS8, DS9, DS10, DS11, DS12, DS13, DS14, and DS15)
- Transfer hopper
- Magnetic separator
- Storage tank #5
- Transfer point: Conveyor (DC3) to magnetic separator
- Rail loadout (with dustless spout)
- Transfer point: Screen (DS3) to bucket elevator (DE4)
- Truck loadout (with dustless spout)
- Sack loading (with dustless spout)
- Grinder DG1, DG2, DG3, DG4, and DG5
- Bucket elevators DE1, DE2, DE3, DE4, DE5, DE7, DE8, DE9, DE10, DE11, and DE12.

The new baghouse will replace the two existing wet scrubbers (Scrubber #2 and Scrubber #3) to control emissions of particulate matter from the existing equipment.

Other Existing Equipment:

- Grizzly
- Vibratory Feeder
- Jaw Crusher
- Crusher Conveyors (CC1, CC2, CC3, CC4)
- Crusher Screens (CS1, CS2)
- Crusher Elevator (CE1)
- Centrifugal Crusher
- Cone Crusher
- Crusher Hopper
- Crushed Ore Stockpile
- Additional Stockpiles (including Raw Stockpile, Bunker Sand Storage, Low Grade Pile, Cominco Rock Storage, and Jad-air Sand)
- Crushed Ore Front-end Loader
- Mill Conveyors (MC1, MC2, MC3)

- Mill Screen (MS1)
- Mill Elevators (ME1, ME2)
- Mill Hoppers (MH1, MH2)
- Mill Grinder
- Mill Vertical Shaft Impactor
- Attenuation Cells
- Mill Cyclones (#1, #2, #3)
- Ball Mill
- Mill Wet Screen
- Classification, Conditioning, and Flotation
- Sand Filter
- Wet Sand Storage Tank
- Dryer
- Dry Dust Collector
- Wet Scrubber #1
- Drying Elevator #6
- Drying Screen #4
- Drying Conveyors (DC1, DC2, DC3, DC4, DC5, DC6, DC8)
- Rail Loadout Conveyors (RLOC1, RLOC2, RLOC3, RLOC4)
- Truck Loadout Conveyor #1
- Loadout Elevator #1
- Sacking Loadout Conveyors (SLOC1, SLOC2, SLOC3, SLOC4)

The above list is not all-inclusive as some smaller equipment and older operations that have not been used in several years have not been included.

DETERMINATIONS

In relation to the above equipment and the evaluation outlined in the Technical Support Document associated with this Order, the Department of Ecology, State of Washington, pursuant to RCW 70.94.152, WAC 173-400-110, and WAC 173-460-040, makes the following determinations:

1. The proposed new source of air contaminants, if operated as herein required, will be in accordance with applicable rules and regulations, as set forth in Chapter 173-400 WAC and 173-460 WAC and the operation thereof, at the location proposed, will not result in ambient air quality standards being exceeded.
2. The proposed operation of this facility, if conducted as herein required, will provide all known, available, and reasonable methods of emission control.

THEREFORE, IT IS ORDERED that the project as described in the Notice of Construction application and more specifically detailed in plans, specifications, and other information submitted to Ecology is approved for construction and operation, provided the following are met:

APPROVAL CONDITIONS

1. Operating Capacity

- a. The maximum material throughput rate to the Grizzly shall not exceed 700,000 tons per 12-consecutive months.

2. Emission Standards and Work Practice Requirements

- a. The baghouse shall meet an outlet particulate matter (PM) concentration of less than or equal to 0.005 grains per dry standard cubic foot (gr/dscf).
- b. The fugitive emissions from the following emission points must not exceed 7 % opacity:
 - i. Transfer point from the reclaim material hopper to conveyor (DC1)
 - ii. Screens (DS1, DS2, DS3, DS5, DS6, DS7, DS8, DS9, DS10, DS11, DS12, DS13, and DS14)
 - iii. Transfer hopper
 - iv. Magnetic separator
 - v. Storage tank #5
 - vi. Transfer point: Conveyor (DC3) to magnetic separator
 - vii. Rail loadout (with dustless spout)
 - viii. Transfer point: Screen (DS3) to bucket elevator (DE4)
 - ix. Truck loadout (with dustless spout)
 - x. Sack loading (with dustless spout)
 - xi. Grinder DG1, DG2, DG3, DG4, and DG5
 - xii. Bucket elevators DE1, DE2, DE3, DE4, DE5, DE7, DE8, DE9, DE10, DE11, and DE12.

Alternatively, for the emission points that are located in a building, the owner or operator can comply by meeting 7% opacity limit from the building openings. Building means any frame structure with a roof.

- c. The owner or operator must take reasonable precautions to minimize fugitive dust emission from the reclaimed storage pile and the transferring of the reclaimed material. The precaution shall include but not limited to maintaining the entire surface of the reclaim material storage pile and the internal haul roads in a stabilized condition. Stabilized condition means the surface is resistant to wind driven fugitive dust. The owner or operator must apply dust suppression on the internal haul roads and the reclaim material storage pile when needed to maintain the surface in a stabilized condition.
- d. The owner or operator must maintain and operate the baghouse in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures.

3. Compliance Demonstration Requirements

- a. Compliance with the emission standards in Condition 2(a) and 2(b) of this approval shall be determined in accordance with the following test methods:
 - i. EPA Method 1-4, determination of traverse points, velocity and flow rate, gas analysis, and moisture content.
 - ii. EPA Method 5 for PM emissions.
 - iii. EPA Method 9 for opacity.
- b. The owner or operator shall maintain records of the manufacturer's guarantee to show compliance with the PM standards in Condition 2(a) of this approval. To demonstrate compliance, Ecology may conduct or require that a test be conducted of the source using approved test methods from 40 CFR parts 51, 60, 61, and 63 in accordance with WAC-173-400-105(4).
- c. Compliance test shall be conducted when the unit is operated at representative operating capacity.

- d. A test plan shall be submitted for approval by Ecology at least 30 days prior to the source testing.
- e. The test report shall be submitted to Ecology no later than 60 days after the tests were conducted.
- f. The owner or operator shall provide sampling ports, safe sampling platforms, safe access to sampling platforms, and utilities for sampling and testing.
- g. Ecology may require stack testing in accordance with WAC-173-400-105(4).

4. Monitoring Requirements

- a. The owner or operator must install, calibrate, maintain, and operate monitoring devices that measure the pressure drop across the baghouse filters. The owner or operator must maintain the pressure drop across the baghouse filter within the manufacturer's recommended operating range. The recommended pressure drop operating range must be clearly labeled at or close to the pressure drop monitoring device. The owner or operator must read and record the pressure drop on a daily basis (on the day of operation) during operation.
- b. The owner or operator must visually inspect the outlet of the baghouse on a daily basis (on the day of operation) during operation for evidence of any visible emissions.
- c. The owner or operator must initiate corrective actions within 1 hour of any visible emissions observed or the pressure drop across the baghouse filter is out of manufacturer's recommended operating range.

5. Recordkeeping Requirements

- a. All records, operations and maintenance manual, and procedures developed under this Order shall be organized in a readily accessible manner and cover a minimum of the most recent 60-month period. The records shall be made available to the Ecology upon request.
- b. The following records are required to be collected and maintained.
 - i. The monthly and 12-consecutive month records of material throughput rate to the Grizzly.
 - ii. The visual inspection for the outlet of the baghouse. The records must include the date of the inspection and if any visible emission observed.
 - iii. The pressure drop reading of the monitoring device.
 - iv. Corrective actions taken.
 - v. Maintenance records of the baghouse.

6. Operation and Maintenance Manuals

A site-specific O&M manual for above listed all equipment, monitoring equipment, monitoring procedures, and monitoring schedules for the all equipment shall be developed and followed. The manual shall be made available to Ecology representatives on request and shall be prepared within 180 days of the issuance of this approval order.

The manual shall be reviewed no less frequently than annually, and updated as necessary. Manufacturers' operating instructions and design specifications for the above listed all equipment shall be included in the manual.

The O&M manual shall be updated to reflect any modifications of the equipment or operating or maintenance or monitoring procedures. Emissions that result from failure to follow the operating procedures contained in the O&M manual or manufacturer's operating instructions may be considered proof that the equipment was not properly installed, operated, and/or maintained. The O&M manual shall at a minimum include:

- a. Normal equipment operating parameters and design specifications;
- b. Maintenance schedules;
- c. Monitoring procedures and schedules;
- d. The facility fugitive dust control plan;
- e. Actions to be taken in the event of any failure of the above listed equipment;
- f. Actions to be taken in the event of non-zero visible emission survey observations.

7. Notification, Reporting and Other Submittals

All notifications, reports, and other submittals shall be sent to:

Washington State Department of Ecology
Air Quality Program
4601 N. Monroe Street
Spokane, WA 99205-1295

emissions.inventory@ECY.WA.GOV

8. General Conditions

- a. **Visible Emissions** - No visible emissions shall be allowed beyond the property line, as determined by opacity readings.
- b. **Commencing/Discontinuing Construction and/or Operations** - The portion of this Approval Order regulating the proposed construction shall become invalid if construction of the equipment described in the NOC application is not commenced within eighteen (18) months after receipt of the Approval Order. If construction or operation of a portion or all of the equipment described in the NOC application is discontinued for a period of eighteen (18) months, the portion of the Approval Order regulating the inactive equipment shall become invalid. Ecology may extend the 18-month period upon a satisfactory showing that an extension is justified
- c. **Compliance Assurance Access** - Access to the source by EPA or Ecology shall be allowed for the purposes of compliance assurance inspections. Failure to allow access is grounds for revocation of the Approval Order for this project.
- d. **Availability of Approval Order and O&M Manual** - Legible copies of this Approval Order and the O&M manual(s) shall be available to employees in direct operation of the equipment described in the NOC application and shall be available for review upon request by Ecology.
- e. **Equipment Operation** - Operation of the equipment identified in this Approval Order shall be conducted in compliance with all data and specifications submitted as part of the NOC application.
- f. **Operation and Maintenance** - Operation and maintenance of the equipment identified in this Approval Order shall be conducted in accordance with the O&M manual. Emissions that result from failure to follow the requirements of the O&M manual or manufacturer's instructions may be considered proof that the equipment was not properly operated, maintained and tested. At any time that process equipment is operating, the associated pollution control equipment shall be operated as designed and in accordance with the O & M manual.
- g. **Modification to Facility or Operating Procedures** - Any modification to the equipment described in the NOC application or its operating procedures, contrary to information in the NOC application, shall be reported to Ecology at least 30 days before such modification. Such modification may require a new or amended Approval Order.

- h. **Activities Inconsistent with this Approval Order** - Any activity undertaken by the permittee or others, in a manner that is inconsistent with the NOC application and this Approval Order shall be subject to Ecology enforcement under applicable regulations.
- i. **Obligations under Other Laws or Regulations** - Nothing in the Approval Order based on this preliminary determination shall be construed to relieve the permittee of its obligations under any local, state or federal laws or regulations.

All plans, specifications, and other information submitted to the Department of Ecology relative to this project and further documents and any further authorizations or approvals or denials in relation thereto shall be kept at the Eastern Regional Office of the Department of Ecology in the "Air Quality Controlled Sources" files and by such action shall be incorporated herein and made a part hereof.

Nothing in this approval order shall be construed as obviating compliance with any requirement of law other than those imposed pursuant to the Washington Clean Air Act and rules and regulations thereunder.

A two (2) month testing and break-in period is allowed, after any part or portion of this project becomes operational, to make any changes or adjustments required to comply with applicable rules and regulations pertaining to air quality and conditions of operation imposed herein. Thereafter, any violation of such rules and regulations or of the terms of this approval shall be subject to the sanctions provided in Chapter 70.94 RCW.

Authorization may be modified, suspended, or revoked in whole or part for cause including, but not limited to, the following:

1. Violation of any terms or conditions of this authorization;
2. Obtaining this authorization by misrepresentation or failure to disclose fully all relevant facts.

The provisions of this approval order are severable and, if any provision of this authorization, or application of any provisions of this authorization to any circumstance, is held invalid, the application of such provision to their circumstances, and the remainder of this authorization, shall not be affected thereby.

YOUR RIGHT TO APPEAL

You have a right to appeal this Approval Order to the Pollution Control Hearing Board (PCHB) within 30 days of the date of receipt of this Approval Order. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal you must do the following within 30 days of the date of receipt of this Approval Order:

- File your appeal and a copy of this Approval Order with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this Approval Order on Ecology in paper form - by mail or in person. (See addresses below.) E-mail is not accepted.

You must also comply with other applicable requirements in Chapter 43.21B RCW and Chapter 371-08 WAC

ADDRESS AND LOCATION INFORMATION

Street Addresses	Mailing Addresses
<p>Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503</p> <p>Pollution Control Hearings Board 1111 Israel RD SW STE 301 Tumwater, WA 98501</p>	<p>Department of Ecology Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608</p> <p>Pollution Control Hearings Board PO Box 40903 Olympia, WA 98504-0903</p>

*For additional information visit the Environmental Hearings Office Website: <http://www.eho.wa.gov>
To find laws and agency rules visit the Washington State Legislature Website:
<http://www1.leg.wa.gov/CodeReviser>*

DATED at Spokane, Washington this **DAY** day of **MONTH**, 2018.

PREPARED BY:

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