State of Washington Department of Ecology
Technical Support Document (TSD)
Notice of Construction (NOC) Approval Order xxxxxxx

Applicant:	Lane Mountain Company
Source Location:	3119 Highway 231, Valley, WA 99181
County:	Steven
Reviewer:	MengChiu Lim

1. PROJECT DESCRIPTION

On April 6, 2018, Lane Mountain Company (LMC) submitted a Notice of Construction (NOC) application for a baghouse installation and a new reclaimed material dryer hopper.

1.1. Project Affected Unit (s)

Currently, two wet scrubbers (Scrubber #2 and Scrubber #3) control emissions of particulate matter from the finishing processes. For this project, LMC proposes to replace Scrubber #2 and Scrubber #3 with a single new baghouse. In addition, LMC proposes to install a reclaim material hopper to allow for stored material to be more readily re-incorporated into the process.

Control Description

Make	Donaldson Torit
Model	226RFWH8 AW
Air Flow	24,000 acfm
Bag Type	Pleated Filter Bags, 80” Spunbond
Number Bags	226
Bag Surface Area	7,887 ft2
Air to Cloth Ratio	3.04:1
Fan	NYB 36 SWSI Class 3 Fan (75 hp)
Pressure Drop Gauge	Magnehelic

The proposed baghouse will be used to control the captured particulate matter emission from:

- Transfer point from the reclaim material hopper to conveyor (DC1)
- Screens (DS1, DS2, DS3, DS5, DS6, DS7, DS8, DS9, DS10, DS11, DS12, DS13, and DS14)
- Transfer hopper
- Magnetic separator
- Storage tank #5
- Transfer point: Conveyor (DC3) to magnetic separator
- Rail loadout
- Transfer point: Screen (DS3) to bucket elevator (DE4)
- Truck loadout
- Sack loading
- Grinder DG1, DG2, DG3, DG4, and DG5
- Bucket elevators DE1, DE2, DE3, DE4, DE5, DE7, DE8, DE9, DE10, DE11, and DE12.

The new reclaimed material hopper allows the facility to load the reclaimed material onto conveyor DC1 before being loaded into dryer. The facility will use front end loader to collect the material from the storage pile, transport and load the material to the reclaimed material hopper.

1.2. Project Permitting

The documents listed below are the basis of this permit. They are specifically related to this permitting action.

Date	Description
4/6/18	Received a copy of the application on 3/20/2018. Received application fee on 4/6/2018.
4/25/18	Request for additional information.
6/18/18	Received additional information.
8/31/18	Preliminary Determination.

2. FACILITY DESCRIPTION

Lane Mountain Company owns and operates a silica production facility at 3119 Highway 231, Valley, WA 99181. The facility is located in an area that is currently designated as attainment or unclassifiable for all ambient air quality standards (NAQQS). See *Figure 1* for proximity location of the facility and *Figure 2* for the satellite image of the facility.

Figure 1 – Facility Location.

Figure 2 – Satellite Image.

The plant operations start with raw ore mined from Lane Mountain and transported to the silica production facility. The ore is crushed, screened, refined, dried, and stored at the production facility before being shipped offsite.

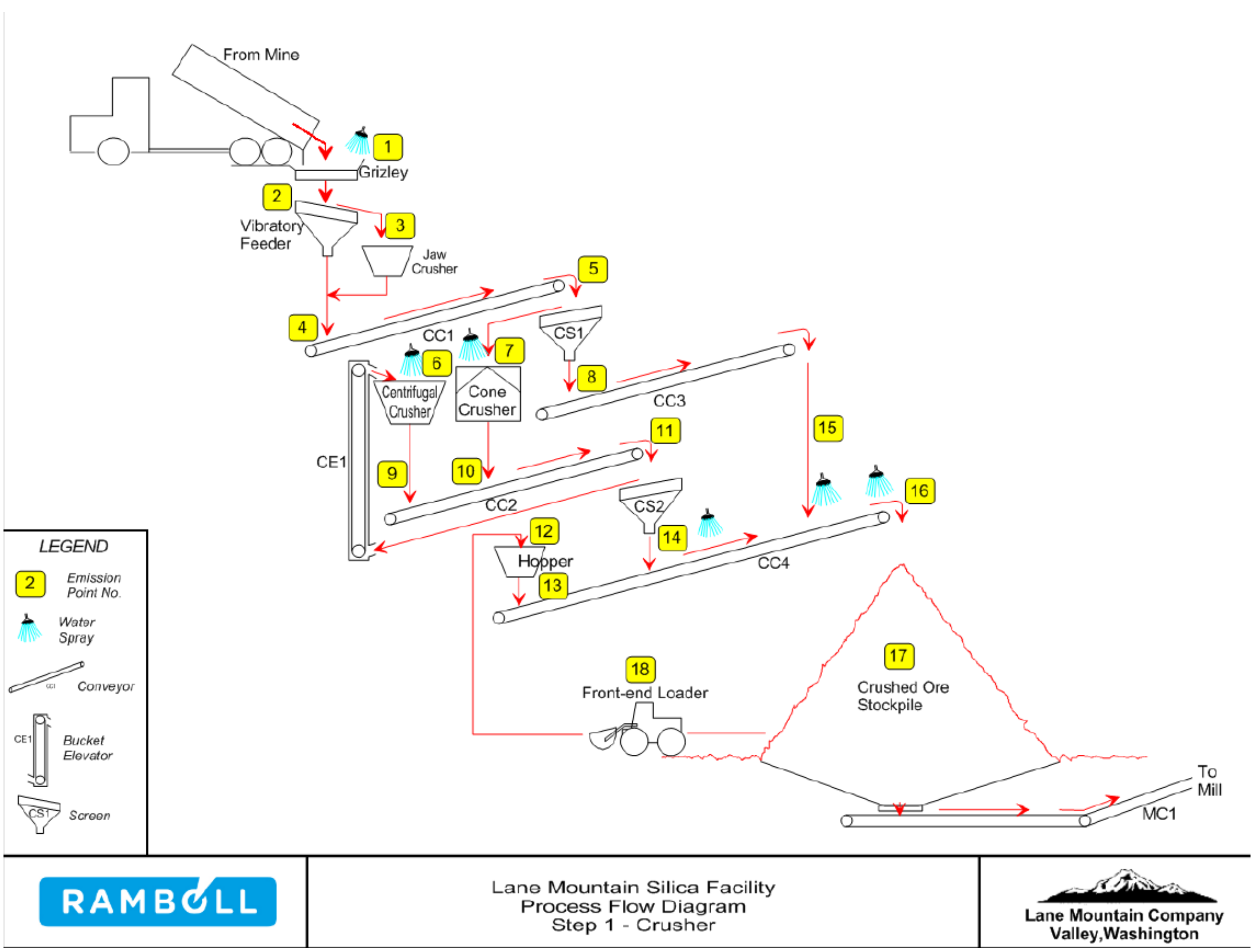
The main plant, finished storage silos, and truck and rail loadouts are located on the east side, most southern part of the plant. The east side of the facility is made up of the following: In the northern most part of the facility is the Bunker sand open storage area. Along State Highway 231 is an open storage area for Cominco Rock. The raw ore storage pile is located just south of the Cominco Rock storage pile. The last open storage pile is the Crushed ore stockpile.

Crushing Operation

The plant operations start with raw ore crushing, mined ore from Lane Mountain is trucked to the facility and dumped into a Grizzly. The Grizzly reduces the raw ore to a size acceptable to the Vibratory Feeder. Ore that is too large for the Vibratory Feeder is screened (screen located prior to feed end of the Vibratory Feeder) off and run through a Jaw Crusher until sized the same as the ore that passed through the Vibratory Feeder. The maximum hourly receiving capacity of the Grizzly and the vibrator feeder is 200 tons per hour. The jaw crusher has a design capacity of 125 tons per hour. The maximum material throughput rate to the Grizzly is limited to 700,000 tons per 12-consecutive months, as an enforceable operational limit in order to determine potential to emit.

Conveyor transfers the crushed ore to a screen. Crushed ore that passes through screen is conveyed to the main conveyor that feeds the crushed ore storage pile. Crushed ore that does not pass through screen is run through a Cone Crusher. Conveyor transfers the crushed ore to screen where ore that passes the screen is dropped to the main conveyor feeding the crushed ore storage pile. Crushed ore that does not pass screen is loaded into a small elevator and run through a Centrifugal Crusher.

Once the crushed ore is through the Centrifugal Crusher it is dumped onto the same conveyor used by Cone Crusher, transferred back by conveyor to screen and if necessary recycled back to the Centrifugal Crusher by elevator until the ore passes screen. Crushed ore dumps onto the main crushed ore conveyor which feeds the main crushed ore storage pile.

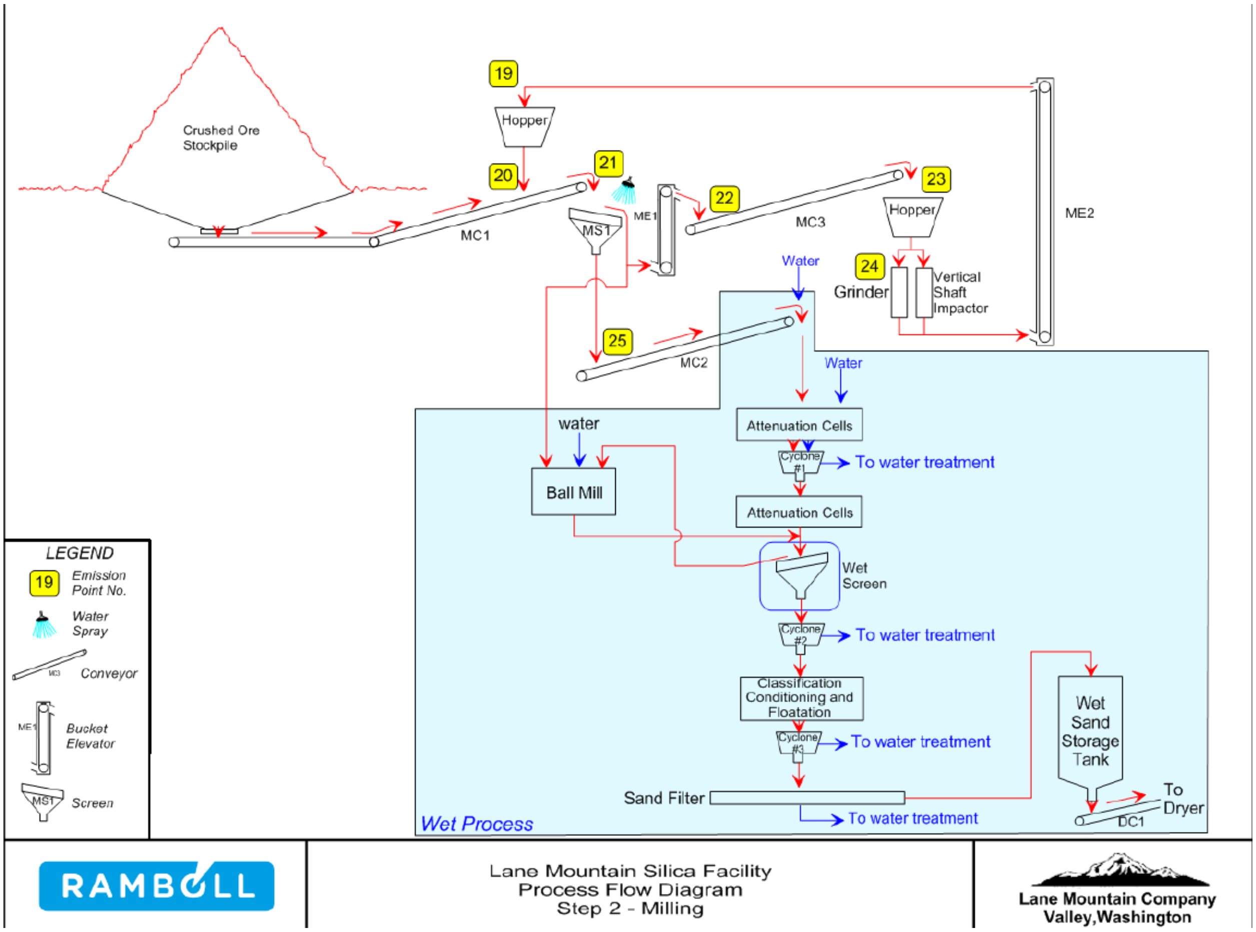


Milling Operation

Crushed ore from storage pile is conveyed to screen (MS1). Crushed ore too large to pass screen (MS1) is transferred to a Ball Mill. Crushed ore that passes screen (MS1) is dropped onto conveyor (MC2) which feeds the Attenuation Cells. Some of the crushed ore from conveyor (MC1) is transferred by elevator (ME1) and dropped to conveyor (MC3). Conveyor (MC3) transfers screened crushed ore to a hopper that feeds either a Grinder or a Vertical Shaft Impactor. Crushed ore run through the Grinder or the Vertical Shaft Impactor are emptied into an elevator (ME2) that drops the crushed ore back into feed
Hopper which dumps onto conveyer (MC1). This process is housed in the blue shed between the crushed ore storage pile and the wet process building.

The Ball Mill receives crushed ore from stockpile. Water is added to the Ball Mill to further process the crushed ore. Conveyer (MC2) feeds the first set of Attenuation Cells. Water and reagents are added to the Attenuation process. Water laden with contaminates are separated out by wet cyclone #1 and sent to water treatment (Jad-Air System). Partly processed ore is transferred to the second set of Attenuation Cells where additional fines are separated out. Ore from the Ball Mill and the set of Attenuation Cells is wet screened. Any processed ore not passing through the wet screen is recycled back through the Ball Mill.

Processed ore that passes through the wet screen is run through cyclone #2 where water laden fines are separated out and sent to water treatment (Jad-Air System). Process ore is now sent through a classification, conditioning, and floatation processes were further water laden contaminates are removed by cyclone #3. Cyclone #3 empties to water treatment (Jad-Air System). Processed ore is dumped onto a rotary sand filter to remove most of the water. Water from the Rotary Sand Filter is captured in a separation tank inside of the building prior to being sent to water treatment (Jad-Air System). The dewatered processed ore is dried when the sand passes over a section of the Rotary Sand Filter were air is drawn through the processed ore by a roots type blower. The blower exhausts into a Wemco silencer located outside of the building, it is unknown the effectiveness of this wet dropout tank in removing particulates prior to exhausting to the atmosphere (this process was not included in the Process Flow Diagrams and was added during review). Dried processed ore is stored in a storage tank. The wet ore in the storage tank is dropped onto conveyer (DC1) that feeds a newer dryer.

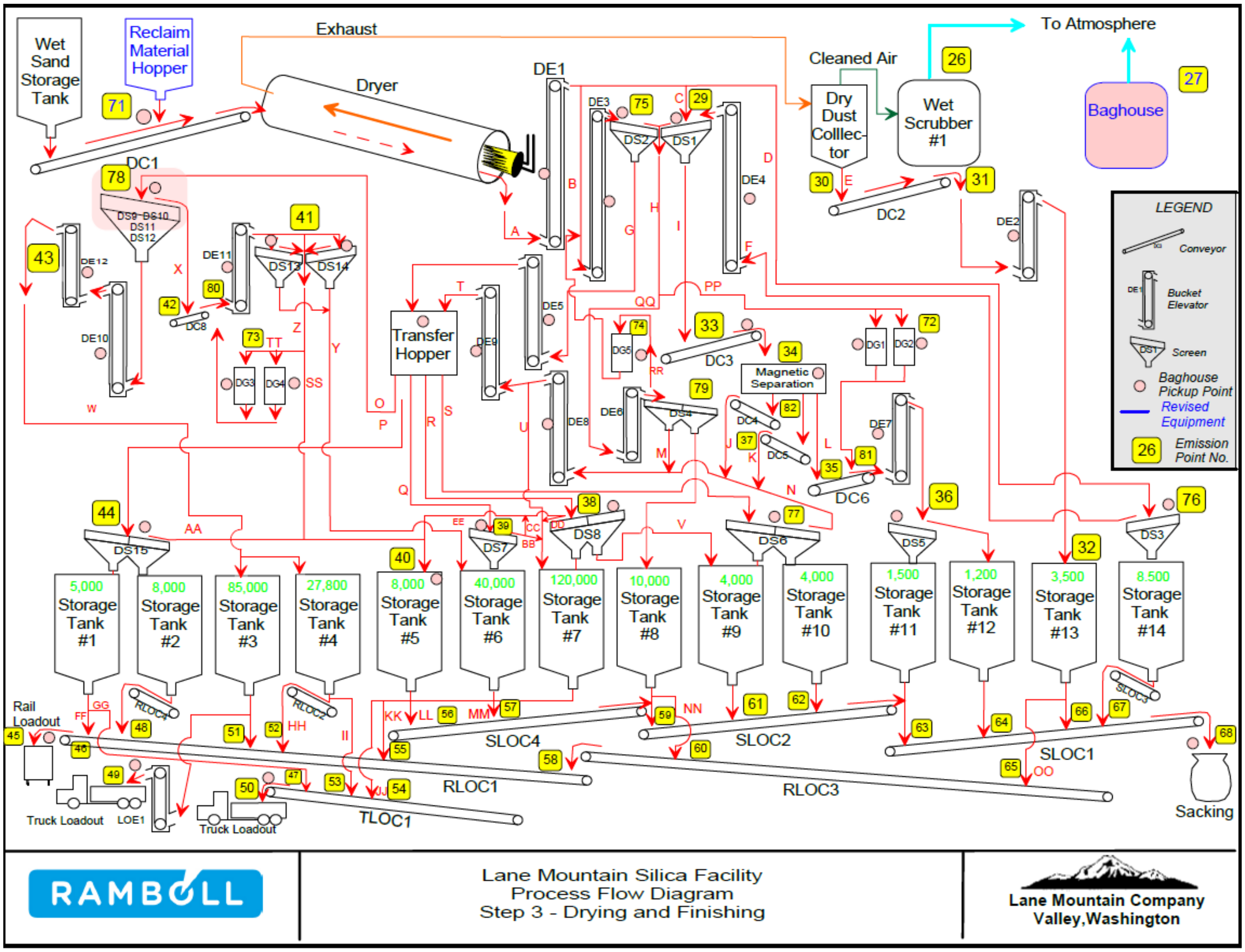


Drying and Finishing

The wet ore in the storage tank is dropped onto conveyer that feeds a newer dryer. The dryer is fueled by pipeline natural gas. Processed ore that may have been collected is emptied onto conveyer (DC2) which loads elevator (DE2). Elevator (DE2) empties into storage silo #13. Partially cleaned air from the Dry Dust Collector is sent to Wet Scrubber #1. Dried finished product is sorted by the following screening processes then transferred into one of six storage tanks (14 total storage tanks):

- Dried finished product is transferred by elevator (DE1) to either elevator (DE3), screen (DS1), or screen (DS3). If the finished product passes screen (DS3) it is stored in storage tank #14.
- If the finished product does not pass screen (DS3), it is transferred to elevator (DE4), rescreened at (DS1). Finished product that does not pass screen (DS1) is loaded into elevator (DE6) and dumped onto screens (DS4). Pending size, the finished product passes through one of two screens (DS4), the first screen of (DS4) loads elevator (DES) which loads elevator (DE9) to the Transfer Hopper or loads into storage tank #7. The second screen loads into storage tank #8.
- Customers that require a finished product free of metallic particles, this product then passes through screen (DS1) is dropped onto conveyor (DC3). Conveyor (DC3) transfers finished product into the Magnetic Separation process that removes metallic materials from the finished product. After the magnetic separation process the finished product dumps onto one of three conveyors. Conveyor (DC4) loads into elevator (DE8), conveyor (DC5) also loads into elevator (DE8), conveyor (DC6) loads into elevator (DE7). Elevator (DE7) dumps onto screen (DS5). Product that passes screen (DS5) fills storage tank #11, product that does not pass screen (DS5) is loaded into storage tank #12.

- Product from elevator (DE1) loads elevator (DE3) and drops onto screen (DS2). What does not pass through screen (DS2) is loaded into elevator (DE6). The path of DE6 was covered previously. Product that passes through screen (DS2) is loaded into elevator (DES) which drops into the Transfer Hopper. From the Transfer Hopper the product is sized by screening and placed into one of 10 storage tanks (total of 14 storage tanks).



3. EMISSION ESTIMATION

3.1. Project Emission

The applicant has estimated the project emission as shown below.

Particle Size Distribution					
PM10 fraction of PM		51%	AP42 Section B.2-2 Category 3 Aggregate and Unprocessed Ores		
PM2.5 fraction of PM		15%	AP42 Section B.2-2 Category 3 Aggregate and Unprocessed Ores		

Existing Emissions - PTE of Abatement Equipment

EP27	**Wet Scrubber No. 2**				
	Airflow Rate		15233	scfm	from Jan 2018 source test x 1.25
	Operations		8760	hr/y	
	Emission Factors:	PM	0.1	gr/scf	Regulatory limit (Jan 2018 source test results were 0.105 gr/dscf)
		PM10	0.051	gr/scf	AP42 Section B.2-2
		PM2.5	0.015	gr/scf	AP42 Section B.2-2
	Hourly Emissions:	PM	13.1	lb/hr	
		PM10	6.66	lb/hr	
		PM2.5	1.96	lb/hr	
	Annual Emissions:	PM	114378	lb/y	
		PM10	58333	lb/y	
		PM2.5	17157	lb/y	
EP28	**Wet Scrubber No. 3**				
	Airflow Rate		14499	scfm	from Jan 2018 source test x 1.25
	Operations		8760	hr/y	
	Emission Factors:	PM	0.01176	gr/scf	from Jan 2018 source test x 2
		PM10	0.005998	gr/scf	AP42 Section B.2-2
		PM2.5	0.001764	gr/scf	AP42 Section B.2-2
	Hourly Emissions:	PM	1.46	lb/hr	
		PM10	0.75	lb/hr	
		PM2.5	0.22	lb/hr	
	Annual Emissions:	PM	12803	lb/y	
		PM10	6529	lb/y	

Total Existing PTE				
	Hourly Emissions:	**PM**	**14.5**	**lb/hr**
		PM10	**7.4**	**lb/y**
		PM2.5	**2.2**	**lb/y**
	Annual Emissions:	**PM**	**63.6**	**tpy**
		PM10	**32.4**	**tpy**
		PM2.5	**9.5**	**tpy**

Project Emissions - PTE of Abatement Equipment and New Hopper System

EP27	**Replacement Baghouse**				
	Airflow Rate		24000	scfm	
	Operations		8760	hr/y	
	Emission Factors:	PM	0.005	gr/scf	Mfg guarantee
		PM10	0.005	gr/scf	Conservatively assume all PM is PM10
		PM2.5	0.005	gr/scf	Conservatively assume all PM is PM2.5
	Hourly Emissions:	PM	1.03	lb/hr	
		PM10	1.03	lb/hr	
		PM2.5	1.03	lb/hr	
	Annual Emissions:	PM	9010.3	lb/y	
		PM10	9010.3	lb/y	
		PM2.5	9010.3	lb/y	

EP70	**Front-end Loader Dump to Dryer Feed Hopper**					
	Material will be reclaimed from the pile by a front end loader and recycled through the drying and finishing processes via the DC1 conveyor during times when the mill is not active.					
	Material via Front-end loader		7,500	tons/yr		
			35	tons/hr		5 trips per hour per J. Scates
	Emission Factors:	PM	ND	(no data)		
		PM10	0.000016	lb/t	AP42 Table 11.19.2.2	
		PM2.5	ND	(no data)		
	Hourly Emissions:	PM	0.00112	lb/hr	(in absense of data use 2xPM10)	
		PM10	0.00056	lb/hr		
		PM2.5	0.00028	lb/hr	(in absense of data use 0.5xPM10)	
	Annual Emissions:	PM	0.24	lb/y	(in absense of data use 2xPM10)	
		PM10	0.12	lb/y		
		PM2.5	0.060	lb/y	(in absense of data use 0.5xPM10)	

EP71	**Transfer from Hopper to DC1 conveyor**								
	Quantity of material transferred			7,500	t/y				
				35	tons/hr		5 trips per hour per J. Scates		
	Emission Factors:		PM	0.00014	lb/t	AP42 Table 11.19.2.2			
			PM10	0.000046	lb/t	AP42 Table 11.19.2.2			
			PM2.5	0.000013	lb/t	AP42 Table 11.19.2.2			
	[Note: the above emission factors are for a "controlled" transfer point.								
	The transfer point acts like a controlled transfer point because the moisture								
	of the reclaimed product is high (stored outdoors). In the AP42 emission factor								
	studies, the controlled transfer points had a moisture content of 0.55% to 2.88%,								
	thus the use of theseemission factors likely overstate emissions.]								
	Hourly Emissions:		PM	0.0049	lb/hr				
			PM10	0.0016	lb/hr				
			PM2.5	0.0005	lb/hr				
	Annual Emissions:		PM	1.05	lb/y				
			PM10	0.35	lb/y				
			PM2.5	0.10	lb/y				

EP69	**Front-end Loader Fugitive Dust for Dryer Feed System**								
	The front end loader produces fugitive dust like a truck traveling on an unpaved								
	roadway. Emissions are based on the vehical miles traveled (VMT) of the loader.								
	Quantity transferred			7,500	t/y				
	Quantity per trip			7	t/trip				
	No. trips per year			1071.4	trip/y				
	No. trips per hour			5	trip/hr				
	Round-trip distance			0.227	mi				
	Miles traveled per year			243.5	VMT/y				
	Miles traveled per hour			1.14	VMT/hr				
	Control from watering			50%	control	due to watering and precipitation			
	Emission Factor								
		$E = k(s/12)^a(W/3)^b$		AP42 Section 13.2.2.2					
		where:	E =	emissionf factor lb/VMT					
			s =	Silt content of surface (assume			10 %)	AP42 Table 13.2.2-1 for stone processing plant road	
			W =	Vehicle weight (tons) (assume			25 tons)	conservative estimate of average of	
			k, a & b are size specific correction factors as follows:					full and empty weight.	
				PM	PM10	PM2.5			
			k	4.9	1.5	0.15			
			a	0.7	0.9	0.9			
			b	0.45	0.45	0.45			
		controlled							
			PM	5.60	lb/VMT				
			PM10	1.65	lb/VMT				
			PM2.5	0.165	lb/VMT				
	Hourly Emissions:		PM	6.36	lb/hr				
			PM10	1.88	lb/hr				
			PM2.5	0.188	lb/hr				
	Annual Emissions:		PM	1363.4	lb/y				
			PM10	402.4	lb/y				
			PM2.5	40.2	lb/y				

Change in PTE Due to Project

Parameter	Pollutant	Units	Project	Existing	Difference
Hourly Emissions:	PM	lb/hr	7.40	14.5	-7.12
	PM10	lb/hr	2.91	7.40	-4.50
	PM2.5	lb/hr	1.22	2.18	-0.96
Annual Emissions:	PM	tpy	5.19	63.6	-58.4
	PM10	tpy	4.71	32.4	-27.7
	PM2.5	tpy	4.53	9.54	-5.01

2.2 Facility Wide Emission

A summary of the facility wide potential emission provided by the applicant is as shown below. Detail calculations can be found in the attached excel spreadsheet.

Operations		PM		PM10		PM2.5		NOX		CO		SO2		VOC		CO2e	
		lb/y	t/y	lb/y	t/y	lb/y	t/y	lb/y	t/y	lb/y	t/y	lb/y	t/y	lb/y	t/y	lb/y	t/y
Sheet 1	Crusher	17,494	8.75	6,126	3.06	1,276	0.64										
Sheet 2	Milling	3,518	1.76	1,145	0.57	109	0.05										
Sheet 3	Dryer/Finishing - Material	115,438	57.72	62,315	31.16	24,426	12.21										
Sheet 5	Dryer - Combustion	1,661	0.83	1,661	0.83	1,661	0.83	21,858	10.93	18,360	9.18	131	0.07	1,202	0.60		13,043
	TOTALS	**138,111**	**69.06**	**71,248**	**35.62**	**27,472**	**13.74**	**21,858**	**10.93**	**18,360**	**9.18**	**131**	**0.07**	**1,202**	**0.60**		**13,043**

Copy of Lane Mountain PTE 2017 ·

4. REASONABLY AVAILABLE CONTROL TECHNOLOGY (RACT)

The applicant proposes to replace Scrubber #2 and Scrubber #3 with a single new baghouse. The baghouse will control the particulate matter emission from screens, material transfer points, and loading/unloading operation. WAC 173-400-114 (Requirements for replacement or substantial alteration of emission control technology at an existing stationary source) applies because the proposal is to replace the control at the existing facility and there is no emission increase due to the project.

WAC 173-400-114 requires that the owner or operator:

a. Employ RACT for the affected emission unit; and
b. Prescribe reasonable operation and maintenance conditions for the control equipment.

Lane Mountain Company owns and operates a silica production facility, which belongs to the Construction Sand and Gravel Mining (NAICS 212321) and/or Industrial Sand Mining (NAICS 212322) source categories regulated by New Source Performance Standards (NSPS) Subpart OOO for Nonmetallic Mineral Processing Plants.

NSPS Subpart OOO was originally promulgated during 1985 and amended during 1997 and 2009. As part of the NSPS Subpart OOO 2009 amendment, EPA reviewed 300 PM stack tests from 1990 and later for a variety of subpart OOO affected facilities and industries. EPA finds that 91 percent of the PM stack test results achieved 0.014 gr/dscf. The control technologies used for the affected facilities tested included primarily baghouses and wet scrubbers designed to meet subpart OOO.

The subpart OOO fugitive emission limits are most commonly met through use of wet suppression (as needed), water carryover, or with a partial enclosure. Wet dust suppression remains the method of choice for the vast majority of the sources. EPA reviewed over 700 fugitive emissions test data points and finds that 95 percent of the data points for Subpart OOO affected facilities (non-crusher) were at or below 7 percent opacity. Therefore, the reviewer finds that baghouse is "reasonable available" control technology for PM emission for the project.

EPA also reviewed the PM limits from 17 states and finds that more stringent PM limits range from 0.0004 to 0.0175 gr/dscf (for OOO source, other than crusher). A copy of EPA's memo "Summary of State Permit Requirements and Facility List for Non-Metallic Mineral Processing Plants Subject to NSPS" regarding this finding is on file for reference. From the memo, the reviewer observes that majority of the limits are less stringent than 0.014 gr/dscf. The more stringent PM limits generally are listed as BACT from the states. Therefore, the reviewer finds that RACT for the baghouse exhaust PM concentration is equal to or less than 0.014 gr/dscf, consistent with NSPS, Subpart OOO PM limit. The applicant proposes to establish PM limit of 0.005 gr/dscf, which meet RACT.

The proposed baghouse will be used to control the captured particulate matter emission from:

- Transfer point from the reclaim material hopper to conveyor (DC1)
- Screens (DS1, DS2, DS3, DS5, DS6, DS7, DS8, DS9, DS10, DS11, DS12, DS13, and DS14)
- Transfer hopper
- Magnetic separator
- Storage tank #5
- Transfer point: Conveyor (DC3) to magnetic separator
- Rail loadout
- Transfer point: Screen (DS3) to bucket elevator (DE4)
- Truck loadout
- Sack loading
- Grinder DG1, DG2, DG3, DG4, and DG5
- Bucket elevators DE1, DE2, DE3, DE4, DE5, DE7, DE8, DE9, DE10, DE11, and DE12.

The reviewer believes that 7 % opacity limit can be consistently achieved, reflecting a well-designed and operated capture system to minimize the emission from the emission points as described above.

For the emission points located within a building, rather than measuring the emissions from each point within a building (which is sometimes difficult due to close equipment spacing and lighting), alternatively the facility can comply by ensuring that the fugitive emissions from the building opening must not exceed 7 percent opacity. Building means any frame structure with a roof.

The installation of the reclaimed material hopper allows the facility to transfer the material from reclaimed material storage pile directly to the conveyor (DC1) before loaded into the dryer. The facility will transfer the material from storage pile to the reclaimed material hopper using front-end loaders. The applicant proposes to apply water and/or dust control agents to the unpaved ways to minimize fugitive emission, and requiring that the onsite speed limit of 10 and 20 miles per hour.

Generally to minimize fugitive dust emission, the best practice is to maintain the entire surface of the reclaim material storage pile and the internal haul roads in a stabilized condition. Stabilized condition means that the surface is resistant to wind driven fugitive dust. The owner or operator can apply dust suppression on the internal haul roads and the reclaim material storage pile when needed to maintain the surface in a stabilized condition. The reviewer believes that the facility shall take all the necessary precautions to minimize fugitive PM emission, and the approval condition will require the facility to apply dust suppression to the storage pile and the unpaved road transporting the material to the reclaimed hopper.

There are other dust control methods can be utilized if dust suppression did not achieve satisfactory result. See the examples below.

Wind Fence slows the wind speed and therefore reduce the wind erosion and dust transports.	
3-sided enclosure.	
Keep the surface covered. Limit the working face of the pile to the downwind side.	
Paving the road. Mechanically cleaning paved surfaces by vacuum sweeping, wet sweeping, or flushing.	

To ensure proper operation of the baghouse, the pressure drop through the baghouse shall be monitored. An increase in pressure drop can indicate that the cleaning cycle is not frequent enough, cleaning equipment is damaged, or the bags are becoming blinded. Decreases in pressure drop may indicate significant holes and tears or missing bags. The owner or operator must establish proper baghouse pressure drop operating range according to manufacturer's recommendation. The owner or operator must also visually inspect the baghouse exhaust for visible emission. Visible emission observed can be indicative of operational issue for the baghouse.

The owner or operator must conduct corrective action if the pressure drop is out of range or any visible emission observed. A corrective action may include an investigation of the reason for the excursion, evaluation of the situation and necessary follow-up action. To demonstrate proper maintenance of the baghouse, the owner or operator shall document all maintenance performed on the baghouse.

5. AIR QUALITY ANALYSIS

4.1 NAAQS

Modeling of the ambient air quality impacts from this facility is not required because there is no emission increase due to the project.

4.2 TAP Impact Level Analysis

Per WAC 173-460-070, this analysis is conducted to ensure that emission from the proposed unit are sufficiently low to protect human health and safety from potential carcinogenic and/or other toxic effects.

There is no toxic air pollutant (TAP) emission rate increase from the project. Therefore, TAP impact analysis is not required.

6. RULE APPLICABILITY

5.1 Source Classification

The facility is not a “Major Source” under WAC 173-401-200 (19) because:

- Does not have the potential to emit, in the aggregate, ten tons per year (tpy) or more of any hazardous air pollutant which has been listed pursuant to section 112(b) of the FCAA, or twenty-five tpy or more of any combination of such hazardous air pollutants.
- Does not have the potential to emit, one hundred tpy or more of any air pollutant subject to regulation.

5.2 Applicable Federal Standards

<u>New Source Performance Standard (NSPS)</u>

Subpart OOO—Standards of Performance for Nonmetallic Mineral Processing Plants.

Applicability Discussion:

- This is a stationary facility that processes sand and gravel, and is considered a fixed nonmetallic mineral processing plant as defined in 40 CFR 60.671.
- Any affected facility that commences construction, modification, or reconstruction after August 31, 1983 is subject to Subpart OOO.
- The facility cannot be exempted under 40 CFR 60.670 (c) because initial crusher (the jaw crusher) of the facility has design capacity more than 25 tons per hour.

The facility consists of affected facilities of NSPS, Subpart OOO. On April 28, 2018, Ecology issued a letter requesting information regarding these Subpart OOO’s affected facilities in order to obtain sufficient information to determine if these affected facilities subject to the requirements in NSPS, Subpart OOO. However, this applicability determination is beyond the scope of the project, therefore is not needed at this time for the purpose of this review. According to the respond received June 18, 2018, the applicant will provide the requested information separately in the future.

Subpart UUU—Standards of Performance for Calciners and Dryers in Mineral Industries.

Applicability Discussion:

- The dryer at the facility is an affected facility of NSPS, Subpart UUU.
- The dryer is subject to the requirements of NSPS, Subpart UUU if constructed, modified, or reconstructed after April 23, 1986,

On April 28, 2018, Ecology issued a letter requesting information about the dryer in order to make NSPS, Subpart UUU applicability determination. However, the applicability determination is beyond the scope of this project, therefore is not needed at this time for the purpose of this review. According to the respond received June 18, 2018, the applicant will provide the requested information separately in the future.

7. STATE ENVIRONMENTAL POLICY ACT (SEPA)

A copy of the environmental checklist was submitted along with the application. The reviewer provided the checklist to Steven County to check if the proposed project triggers SEPA criteria for the County. Based on the emails received from the County on April 17 and April 30, 2018, it does not appear that the project will trigger the County's SEPA review. Therefore, It is determined that Ecology will be the lead agency for the project.

After reviewing the submitted environmental checklist and the application, the reviewer finds that the proposal will not have significant adverse environmental impacts and propose to issue a determination of nonsignificance (DNS) for the project.

8. PUBLIC COMMENT

The application triggers mandatory 30-days public comment period per WAC 173-400-171(3) because it is an order that includes a reasonably available control technology (RACT) determination.

A newspaper public notice announcing the public comment period was published in the [insert newspaper name] on [insert date].

9. CONCLUSION

The reviewer has determined that the applicant, Lane Mountain Company, has satisfied all of the requirements of New Source Review. The operation of this unit shall be subject to the conditions of the attached proposed Approval Order No. xxxxx.