ORDER OF APPROVAL

NOTICE OF CONSTRUCTION 24NOC1648

ISSUED to Frontier Construction Supply LLC on

OCT 3 0 2024

This Order of Approval ("Order") is issued in accordance with Olympic Region Clean Air Agency ("ORCAA") Rule 6.1(a)(3) and Washington Administrative Code 173-400-114.

Conditional approval to after-the-fact approval of a baghouse installation located at 4101 E. State Route 3, in Shelton ("Approved Location"), for operation solely as described in the associated Notice of Construction ("NOC") application 24NOC1648, is hereby GRANTED to Frontier Construction Supply LLC ("Applicant"), subject to the Conditions of Approval listed below.

This Order and the Conditions of Approval herein remain in effect for the life of the Approved Equipment as used at the Approved Location and are binding on Applicant, current owners and operators of the equipment, and Applicant's heirs, successors and assigns unless amended or superseded by a subsequent Order issued by ORCAA or unless the equipment is permanently shut down. The Applicant must notify any subsequent owner, operator, heirs, successor or assigns of this Order and the Conditions of Approval herein.

Conditions of Approval established in this Order are enforceable in addition to any applicable state, local and federal regulations or standards in existence now or in the future. Compliance with the conditions of this Order do not relieve the Applicant or any owner or operator from compliance with ORCAA Regulations, chapter 70A.15 of the Revised Code of Washington, or any other emissions control requirements, nor from any penalties for failure to comply with the same. Applicant may appeal this Order to the Pollution Control Hearings Board ("PCHB") by filing a written appeal with the PCHB and serving a copy upon ORCAA within thirty (30) days of receipt of this Order.

This Order is GRANTED, subject to the following Conditions of Approval:

1. **Approved Equipment.** The after the fact approval of a baghouse installation as described in Notice of Construction application No. 24NOC1648, the associated

Final Determination and the following table is approved subject to conditions in this Order of Approval.

Table 1: Approved Air Pollution Control Technology

Control Technology	Specifications:
Baghouse	Baghouse Manufacturer: C&W Dust Tech Type: Pulse Jet Cartridge, recycle system with rotary vane feeder and timer Model#: CP5250-480-R Serial#: 66766-01-01 Design air flow of 5,250 acfm Filter rated at 99.99% overall particulate removal control efficiency

[Regulatory Basis: ORCAA 6.1.2(l); WAC 173-400-114(1)]]

2. **RACT Limits**
   a) Displaced air from transfer of cement to the cement silo must be controlled by an operable dust filter system.
   b) Opacity: Visible emissions from the baghouses must not exceed 0% (zero percent) opacity during any 6-minute average period in accordance with as determined by EPA Reference Method 9 of 40 CFR Part 60, Appendix A.
   c) Filter Efficiency: The filter efficiency of the bags must have an effective rating of 99% or better. Published filter efficiency data provided by the manufacturer or laboratories is sufficient for the purposes of demonstrating compliance with this requirement.

[Regulatory Basis: ORCAA Rule 6.1.10(b)(1); WAC 173-400-114(2)(a)]

3. **Operation and Maintenance Plan**

The owner or operator must devise, implement, and update, when necessary, an Operations and Maintenance (O&M) plan for assuring good operating condition and repair of air pollution control devices. At a minimum the plan must contain the following:

   a) Any manufacturer recommendations for operating and maintaining approved equipment. In absence of any manufacturer recommendations, specific O&M procedures shall be developed and included.
   b) Procedures for the inspection and prompt repair of the baghouses to ensure the baghouses are operating as intended.

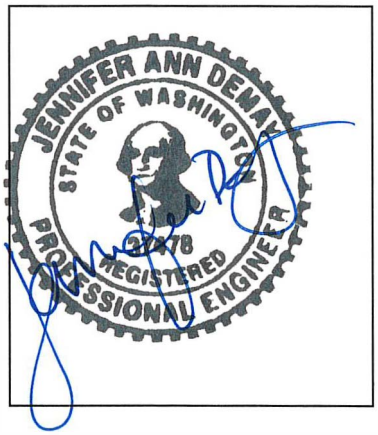
[Regulatory Basis: ORCAA Rule 6.1.10(b)(2); WAC 173-400-114(2)(b)]

4. **Required Records**

The following records must be maintained on-site for no less than two years from origination, and made available for inspection by ORCAA upon request:

a) The O&M plan required by condition #3. O&M plan shall be maintained on-site for the duration of the facility.
b) Manufacturer recommendations for operating and maintaining the baghouse;
c) Records of baghouse inspections conducted. For the purposes of demonstrating compliance, a checklist can be made;
d) Records of all baghouse maintenance.

[Regulatory Basis: ORCAA Rule 6.1.10(b)(2); WAC 173-400-114(2)(b)]



10/10/2024

PREPARED BY: Abi Roberts, Engineer I **Date**

10/10/2024

REVIEWED BY: Jennifer DeMay, PE **Date**

Olympic Region Clean Air Agency
2940 Limited Lane NW
Olympia, WA 98502

(360) 539-7610
Or 1-800-422-5623
Fax: (360) 491-6308
www.ORCAA.org

Executive Director
Jeff C. Johnston

Serving Clallam, Grays Harbor, Jefferson, Mason, Pacific, and Thurston counties.

FINAL DETERMINATION to APPROVE:

Baghouse Installation

Frontier Construction Supply LLC

24NOC1648

October 10, 2024

Table of Contents

1. Summary 1
2. Regulatory Background 1
3. Facility Background 2
4. Facility Description 3
5. Project Description 5
6. Emissions Evaluation 6
7. Administrative Requirements for NOC Applications 6
8. SEPA Review 6
9. Provisions for Approval 6
10. Requirements for Major Stationary Sources and Major Modifications to Major Stationary Sources 8
11. Title V Air Operating Permit (AOP) Implications 8
12. Environmental Justice Considerations 9
13. Conditions of Approval 10
14. Final Determination to Approve 12

NOTICE OF CONSTRUCTION

FINAL DETERMINATION TO APPROVE

Issued to:	**Frontier Construction Supply LLC**	**County:**	**45**
Location:	**4101 E. State Route 3** **Shelton, WA 98584**	**Source:** **RC:**	**28** **RC5**
Application #:	**24NOC1648**	**File:**	**1009**
Prepared on:	**October 10, 2024**		

1. Summary

Frontier Construction Supply LLC (Frontier) seeks approval from Olympic Region Clean Air Agency (ORCAA) for after the fact approval of a baghouse installation at their concrete batch plant located in 4101 E. State Route 3, Shelton, Washington. Baghouses are regulated as air pollution control devices. Replacing a control device requires prior approval by ORCAA through a Notice of Construction (NOC) application. ORCAA staff reviewed Frontier's proposal and concluded it may be conditionally approved. Recommended conditions of approval are detailed in Section 13 of this Final Determination report.

2. Regulatory Background

Pursuant to the Washington Clean Air Act under 70A.15.2220 of the Revised Code of Washington, ORCAA's Rule 6.1(a)(3) and Washington Administrative Code 173-400-114 (WAC 173-400-114) require review and approval through a Notice of Construction (NOC) application prior to replacing or substantially altering any air pollution control technology that does not qualify as routine maintenance, repair, or similar parts replacement. Per Rule 6.1.10, only projects that do not increase air pollution qualify for review under Rule 6.1(a)(3) and WAC 173-400-114. Projects involving replacement or substantial alteration of air pollution control technology that increase air pollution are considered either "New Sources" or "Modifications," and are subject to New Source Review (NSR). All other projects involving replacement or substantial alteration of air pollution control technology are subject to ORCAA's Rule 6.1.10 and WAC 173-400-114, which provide that ORCAA may:

1. Require the owner or operator employ "Reasonably Available Control Technology" RACT on the affected stationary source (on the emissions unit served by the subject control technology);
2. Prescribe reasonable operation and maintenance conditions for the control equipment; and,

3. Prescribe other requirements as authorized by chapter 70A.15 RCW.

Projects involving only routine maintenance, repair or similar parts replacement are not considered replacing or substantially altering air pollution control technology, provided the same level of air pollution control is achieved. Applicability of this exemption is determined on a case-by-case basis and may involve comparing the cost of the project with respect to the original cost of the control technology. Replacing or rebuilding the majority of critical parts of an air pollution control technology is not considered routine maintenance, repair or similar parts replacement.

Review and approval under ORCAA Rule 6.1(a)(3) is initiated by a project proponent submitting an NOC application[1]. The NOC application provides ORCAA information on the proposed project of sufficient detail to characterize air impacts, evaluate compliance with applicable air requirements and determine how to apply the provisions under ORCAA Rule 6.1.10 and WAC 173-400-114. NOC applications are posted on ORCAA's website and may undergo a public notice and comment period if requested by the public.

In this case Frontier has installed a baghouse, which controls air emissions from the existing cement plant including loading and truck charging operations and the cement silo. Air pollutant emissions rates are expected to be reduced as a result of this action. Also, ORCAA staff reviewed Frontier's NOC application and determined the project does not qualify as routine maintenance, repair or similar parts replacement. Therefore, review and approval of the project under ORCAA Rule 6.1.10 and WAC 173-400-114 is required.

3. Facility Background

Frontier was established in 1967 and moved to the current site of operations in 1985, it is currently a registered non-emission inventory source with ORCAA. Operations have been historically intermittent at the site, with very few complaints. The silo on the site has been used for cement only. The first interaction with ORCAA was a drive by March 25, 2005, when an inspector noticed a cloud of cement dust and decided to investigate the site. The facility had been using low pressure for loading combined with a hose attached to a water drum for controlling fugitive emissions. This NOC application is the first for the facility as the existing concrete batch plant was constructed before the NSR Effective Date for concrete batch plants. The 1.2 MMBTU/Hr propane boiler installed in 2023 was exempt from the requirement to obtain approval from ORCAA through a NOC due to its size (ORCAA Regulations 6.1(c)(26)(ii)).

[1] There are two categories of NOC applications: Notice of Construction (NOC) and Notice of Construction Revision (NOR). NOCs are required for new or modified sources, new control technology, replacing an existing stationary source or control technology, and substantially altering control technology. NORs are required when an owner or operator requests a revision to an existing air permit issued by ORCAA.

4. Facility Description

Located right next to state highway 3, Frontier Construction Supply LLC is a dry concrete batch plant that produces 'truck mixed' or 'transit mixed' ready mix for concrete products. It is comprised of a cement silo, a baghouse, an aggregate hopper with a conveyor, an office shed, a box container with a 1.2 MMBTU/Hr boiler, and a wheel washing area.

Process

There is an aggregate hopper that is filled with aggregate via loading by front loader. Material is conveyed via an uncovered conveyor belt from the hopper to the silo where it is mixed with cement and discharged into trucks for mixing and transport.

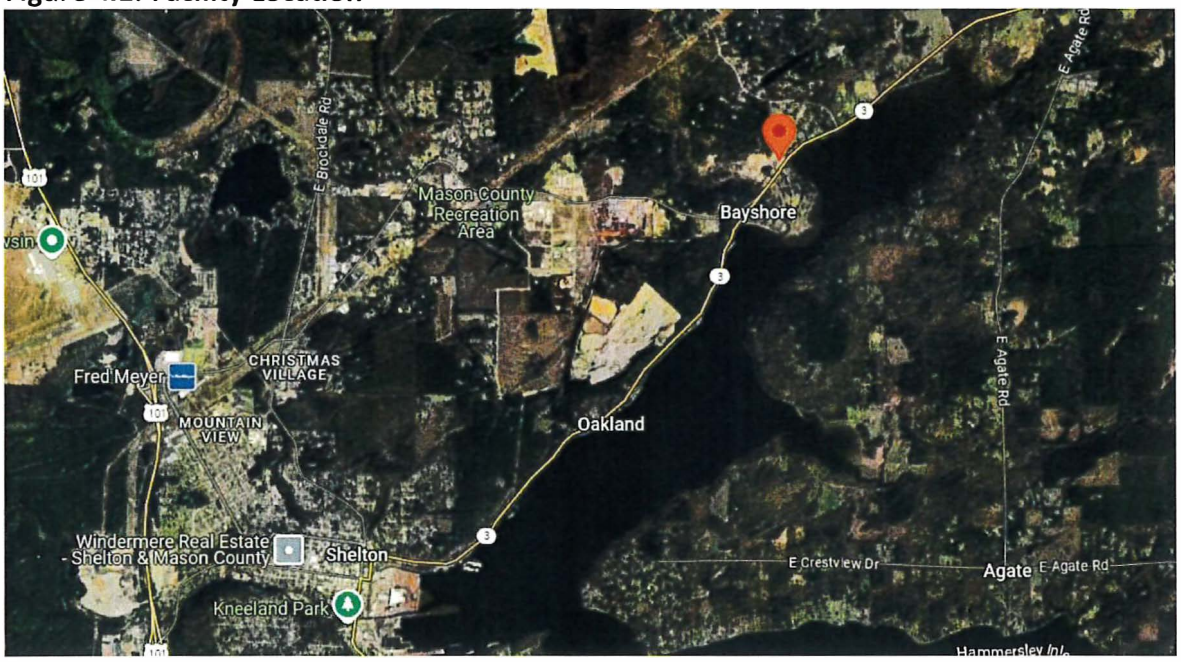
Controls

Previous to installation of the baghouse, dust emissions generated during the loading and truck charging operations were controlled by plywood enclosure. Previous inspections also reported that the driver would spray the truck drum down to reduce dust. During cement deliveries, dust was controlled by placing a tube out of the top of silo into a large bucket of water which acted as a "wet scrubber". Other dust control measures employed on the site include a wheel washing station for trucks. Project related equipment can be seen in Table 4.1.

Table 4.1: Existing Emission Units

Equipment	Air Pollution Control
Concrete batch plant	Plywood enclosure around chute
Cement Silo Unknown manufacturer	Venting emissions through tube into bucket of water during cement deliveries
Boiler (exempt per ORCAA Regulations 6.1(c)(26)(ii))	Manufacturer: Sioux Corporation Model #: WHC1.0PG Serial #: 2309031 Maximum heat input rate: 1.2 MMBTU/Hr Fuel: Propane

Figure 4.1: Facility Location



* Imagery ©2024 Airbus, CNES/Airbus, Landsat/Copernicus, Maxar Technologies, USDA/FPAC/GEO, Map data @2024 Google
** Annotated by ORCAA

Figure 4.2: Site Map

* Site map with annotations provided by Frontier Construction Supply LLC

Figure 4.3: Baghouse

* Photo taken during ORCAA inspection dated May 21, 2024

5. Project Description

Frontier replaced the control methods described in Section 4 with a baghouse. The baghouse controls emissions from the truck loading operations as well as the cement silo.

Table 5.1: Air Pollution Control Technology Specifications

Air Pollution Control Technology	Specifications
Baghouse	Manufacturer: C&W Dust Tech Type: Pulse Jet Cartridge, recycle system with rotary vane feeder and timer Model#: CP5250-480-R Serial#: 66766-01-01 Design air flow of 5,250 acfm Filter rated at 99.99% overall particulate removal control efficiency

6. Emissions Evaluation

Actual emission rates from the facility are not expected to increase as the new baghouse will be more efficient at controlling particulate emissions in comparison to the previous dust control measures. Therefore, a net decrease in particulate emissions is expected. Maximum potential to emit (PTE) from the baghouse was calculated using the design capacity rates for the baghouse in the NOC application and applying the maximum grain per dry standard cubic foot (gr/dscf) standard for particulate emissions.

7. Administrative Requirements for NOC Applications

All NOC applications are subject to filing fees according to ORCAA Rule 3.3(b) and may incur additional NOC processing fees at an hourly rate according to ORCAA Rule 3.3(c). Applicable NOC filing fees for Frontier's NOC application were paid prior to ORCAA commencing processing of the application. Additional NOC processing fees may apply and will be determined and assessed prior to issuing a Final Determination and the Approval Order (a.k.a.: Air Permit).

NOC applications are subject to a 15-day public notice and an opportunity to request a 30-day public comment period and opportunity for a public hearing. Public notice of Frontier's NOC application was posted on ORCAA's website on June 11, 2024, at 11:00 am The time period for filing comments on the application and requests for a public comment period expired on June 26, 2024, at 4:30 pm. No comments were received during the 15-day NOC application notice.

8. SEPA Review

The State Environmental Policy Act (SEPA) under Chapter 197-11 WAC is intended to provide information to agencies, applicants, and the public to encourage the development of environmentally sound proposals. The goal of SEPA is to assure that significant impacts are mitigated.

The proposed baghouse replaces previous dust control measures. As there is no material expansion or change in use beyond that previously existing, the project qualifies for a SEPA exemption under WAC 197-11-800(3).

9. Provisions for Approval

For projects triggering review and approval solely as replacements or substantial alterations of air pollution control technology, RCW 70A.15.2220 provides ORCAA authority to:

a) Require the owner or operator employ "Reasonably Available Control Technology" (RACT) on the affected stationary source (on the emissions unit served by the subject control technology); and,
b) Prescribe reasonable operation and maintenance conditions for the control equipment.
c) Prescribe other requirements as authorized by Chapter 70A.15 RCW.

These provisions are administered under ORCAA's Rule 6.1.10 and WAC 173-400-114.

The following sections provide more detail on each of the above three stated provisions.

Reasonably Available Control Technology (RACT):

RACT is defined in ORCAA's Rule 1.4 as:

The lowest emission limit that a particular stationary source or stationary source category is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility. RACT is determined on a case-by-case basis for an individual stationary source or stationary source category taking into account the impact of the stationary source upon air quality, the availability of additional controls, the emission reduction to be achieved by additional controls, the impact of additional controls on air quality, and the capital and operating costs of the additional controls. RACT requirements for any stationary source or stationary source category shall be adopted only after notice and opportunity for comment are afforded.

ORCAA staff's conclusion is that the installation of a baghouse with 99.99% control efficiency proposed by Frontier meets the standard of RACT for this case. Additionally, ORCAA will require an opacity RACT standard of 0% (zero percent) on the baghouse.

Reasonable Operation and Maintenance Conditions:

Staff requires that the owner or operator continue to maintain and implement an Operation and Maintenance Plan (O&M plan) to ensure good operating condition and repair of air pollution control devices. At a minimum, the plan shall include any manufacturer recommendations for operating and maintaining approved equipment. In absence of any manufacturer recommendations, specific O&M procedures shall be developed and included.

Requirements as Authorized by Chapter 70A.15 RCW:

Requirements "*authorized by chapter 70A.15 RCW*" refers to performance standards that apply to specific categories of equipment such as boilers, engines incinerators, etc. RCW 70A.15.3050 requires every activated authority operating an air pollution control program to promulgate or adopt requirements for the control of emissions from stationary sources, which are no less stringent than those adopted by the Washington Department of Ecology (Ecology), for the geographic area in which such air pollution control program is located. Requirements less stringent than Ecology's requirements may be adopted only if approved by Ecology, and only after a public process. More stringent control requirements are allowed without Ecology's approval. ORCAA's program is comprised of ORCAA-specific, State and federal performance standards, which are at least as stringent the standards adopted by Ecology.

ORCAA staff surveyed all relevant performance standards that may apply to either the subject baghouse or the concrete batch plant. For each relevant standard, applicability was evaluated and is summarized in the following tables. The performance standards in Table 9.1 were determined applicable to either the subject baghouse or the cement silo it serves.

A comprehensive list of applicable performance standards that apply to all stationary sources of air pollution located at the facility, as well as general air regulations and standards that apply, are included in the Appendix.

Table 9.1: Applicable Performance Standards specific to the proposed baghouse

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	Applies to
Particulate Standards for Process Units WAC 173-400-060 ORCAA Rule 8.3	Prohibits emissions of particulate material from any general process operation in excess of 0.23 grams per dry cubic meter at standard conditions (0.1 grain/dscf) of exhaust gas.	Concrete Batch Plant
General Standards for Maximum Visual Emissions WAC 173-400-040(2) ORCAA Rule 8.2(a)	Prohibits emissions with opacity of greater than 20% for more than three (3) minutes in any one hour.	
Fallout Prohibition *WAC 173-400-040(3) & ORCAA 8.3(e)*	Prohibits particulate emissions from any source to be deposited, beyond the property under direct control of the owner or operator of the source, in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material was deposited.	All emissions units and fugitive sources
Control Equipment Maintenance and Repair	ORCAA Rule 8.8 requires that all air contaminant sources keep any process and/or air pollution control equipment in good operating condition and repair.	All air pollution control technology

Note: This table provides applicability determinations with respect to the subject baghouse and cement silo only.

10. Requirements for Major Stationary Sources and Major Modifications to Major Stationary Sources

Projects that are major stationary sources and major modifications to major stationary sources may be subject to permitting requirements under WAC 173-400-700 through 173-400-860.

Frontier Construction Supply LLC is not a "Major Stationary Source" under the permitting program required by WAC 173-400-700 through WAC 173-400-860. Therefore, these permitting requirements do not apply.

11. Title V Air Operating Permit (AOP) Implications

The State of Washington program pursuant to Title V of the federal Clean Air Act is governed under Chapter 173-401 WAC, the Washington Air Operating Permit Program. Chapter 173-401 WAC requires existing major stationary sources to operate in compliance with an approved Air Operating Permit (AOP). Major stationary sources are those stationary sources with a potential to emit which is greater than 100 tons per year of any criteria pollutant, greater than 10 tons

per year of any hazardous air pollutants (HAP), or greater than 25 tons per year of any combination of HAP.

Frontier Construction Supply LLC is not a "Major Source" under the Title V program and is not subject to the requirement to operate under an AOP.

12. Environmental Justice Considerations

EPA defines Environmental Justice (EJ) as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. The purpose of an EJ review in conjunction with an air permitting action is to ensure no group of people bear a disproportionate share of the negative environmental consequences as the result of the permitting action. Further, ORCAA strives to engage the affected community effectively and meaningfully regarding the permitting action, and to ensure compliance with obligations pursuant to Title VI of the Civil Rights Act. With respect to factoring EJ into air permitting decisions, EPA Region 10 expects air agencies to:

· Identify overburdened communities;

· Engage with communities;

· Evaluate cumulative impacts; and,

· Use available authority to minimize emissions.

However, EPA Region 10 does not expect air agencies to use the Clean Air Act's authorities to address existing disproportional impacts to communities when implementing New Source Review in areas that are "attainment/unclassifiable" with respect to meeting the NAAQS.

The following subsections describe how these expectations from EPA Region 10 were met.

12.1 Identify Overburdened Communities

The initial step in an EJ review is to identify any affected populations or communities of concern and to identify whether they are disproportionally impacted. ORCAA used EPA's environmental justice screening and mapping tool, EJScreen, to answer this first part of this question. An EJScreen Community Report was generated for Mason County. The Community Report estimates a minority population of 22%, with approximately 6% of the total population speaking Spanish and 2% speaking another Non-English language at home. All demographic indicators were below the 80th percentile for the nation. Likewise, the Community Report indicates that Mason County is below the 80th percentile for all environmental indicators. Environmental indicators above the 80th percentile are an indication that a community is already disproportionately impacted. Therefore, ORCAA staff's conclusion is that the project impact area does not include any preexisting, overburdened communities. A copy of the

Community Report with more detailed information will be filed as part of the supporting documentation for the project.

Preexisting air quality impacts were evaluated based on ambient air quality monitoring data and designation of the area with respect to maintaining compliance with the NAAQS. If air quality in a geographic area meets or is cleaner than a national standard based on ambient air monitoring data, it is called an attainment area and designated "attainment/unclassifiable." Areas may also be presumed "attainment/unclassifiable" based on population density and air pollutant emissions being below certain thresholds. For this case, the project impact area and Mason County as a whole is designated "attainment/unclassifiable." Therefore, there are no preexisting nonattainment issues identified within the County. The project's criteria emissions will not cause or contribute to a violation of an AAQS. Therefore, ORCAA staff's conclusion is that there are no indications of any existing disproportional impacts to communities of concern within the project impact area.

12.2 Engage with Communities

Based on the size and scope of the project, and that there are no overburdened communities near the project, ORCAA staff determined the public noticing procedures outlined in Section 7 above are sufficient notifications.

12.3 Evaluate Cumulative Impacts

The air permitting action for this case did not trigger a cumulative impacts analysis under either the Clean Air Act or the Washington Clean Air Act. Installation of a baghouse will result in emissions either remaining the same or decreasing.

12.4 Use Available Authority to Minimize Emissions

As described elsewhere in this report, ORCAA applied existing New Source Review authorities provided under the Clean Air Act and the Washington Clean Air Act to minimize emissions from the after-the-fact approval of a baghouse installation project. Principally among these authorities is the requirement to use RACT for controlling emissions. The RACT requirement was applied and corresponding RACT emissions limits are included in the air permit.

13. Conditions of Approval

The following conditions of approval were determined necessary for assuring compliance with applicable air regulations and standards and protecting air quality. Recommended conditions of approval will become effective with once the Approval Order is issued:

1. **Approved Equipment**

The after-the-fact approval of a baghouse installation as described in Notice of Construction application No. 24NOC1648, the associated Final Determination and the following table is approved subject to conditions in this Order of Approval.

Table 1: Approved Air Pollution Control Technology

Control Technology	Specifications:
Baghouse	Manufacturer: C&W Dust Tech Type: Pulse Jet Cartridge, recycle system with rotary vane feeder and timer Model#: CP5250-480-R Serial#: 66766-01-01 Design air flow of 5,250 acfm Filter rated at 99.99% overall particulate removal control efficiency

[Regulatory Basis: ORCAA 6.1.2(l); WAC 173-400-114(1)]]

2. RACT Limits

a) The cement weigh hopper, the loading chute, and displaced air from transfer of cement to the cement silo must be controlled by an operable dust filter system.
b) Opacity: Visible emissions from the baghouse must not exceed 0% (zero percent) opacity during any 6-minute average period in accordance with as determined by EPA Reference Method 9 of 40 CFR Part 60, Appendix A.
c) Filter Efficiency: The filter efficiency of the bags must have an effective rating of 99% or better. Published filter efficiency data provided by the manufacturer or laboratories is sufficient for the purposes of demonstrating compliance with this requirement.

[Regulatory Basis: ORCAA Rule 6.1.10(b)(1); WAC 173-400-114(2)(a)]

3. Operation and Maintenance Plan

The owner or operator must devise, implement, and update, when necessary, an Operations and Maintenance (O&M) plan for assuring good operating condition and repair of the baghouse. At a minimum the plan must contain the following:

a) Any manufacturer recommendations for operating and maintaining the baghouse. In absence of any manufacturer recommendations, specific O&M procedures shall be developed and included.
b) Procedures for the inspection and prompt repair of the baghouse to ensure the baghouses are operating as intended.

[Regulatory Basis: ORCAA Rule 6.1.10(b)(2); WAC 173-400-114(2)(b)]

4. Required Records

The following records must be maintained on-site for no less than two years from origination, and made available for inspection by ORCAA upon request:

a) The O&M plan required by condition #3. O&M plan shall be maintained on-site for the duration of the facility.
b) Manufacturer recommendations for operating and maintaining the baghouse;
c) Records of baghouse inspections conducted. For the purposes of demonstrating compliance, a checklist can be made;

d) Records of all baghouse maintenance.

[Regulatory Basis: ORCAA Rule 6.1.10(b)(2); WAC 173-400-114(2)(b)]

14. Final Determination to Approve

This Final Determination report documents ORCAA staff's determinations with respect to the applicable criteria of approval in ORCAA Rule 6.1.10 and WAC 173-400-114. ORCAA staff recommends approval of Frontier's proposed after the fact approval of a baghouse installation, provided the conditions identified in Section 13 of this Final Determination are implemented through an enforceable Order of Approval (AKA: Air Permit). Information supporting this Final Determination is attached and includes:

~ end of section ~

10/10/2024

PREPARED BY: Abi Roberts, Engineer I **Date**

10/10/2024

REVIEWED BY: Jennifer DeMay, PE **Date**

Attachments

Applicable Performance Standards that apply to Frontier Construction Supply LLC

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	Applies to
Registration ORCAA Regulation 4	Requires facilities that are minor sources of emissions to register annually with ORCAA and pay annual registration fees.	Frontier will continue to be a minor source requiring registration.
Annual Registration Fees ORCAA Rule 3.1	Requires payment of annual registration fees to ORCAA based in part on air pollutants emitted during the previous year.	Frontier is required to register and pay annual registration fees.
Initial Notification ORCAA Rule 4.3(a)&(b); 4.3(f)	Requires facilities subject to registration to register by submitting an initial notification with the information in ORCAA Rule 4.3(b) within 30 days from: 1) Commencement of operation of any new or recommissioned stationary source; 2) Change in ownership of existing registered stationary source. The notification must be signed by the owner or operator or by the agent appointed by the owner.	
Administrative Change Notification ORCAA Rule 4.3(e); 4.3(f)	Requires facilities to notify ORCAA of any changes to administrative information within 30 days from the change taking place including, but not limited to, contact names, address, phone numbers, and permanent shut down or decommissioning of a stationary source. The notification must be signed by the owner or operator or by the agent appointed by the owner.	
Annual and/or Periodic Reports ORCAA Rule 4.3(c)&(d); 4.3(f)	Requires stationary sources to submit reports with information directly related to the registration program when requested by the Agency within 30 days of receipt of the request. The submittal must be signed by the owner or operator or by the agent appointed by the owner.	
Interference or Obstruction ORCAA Rule 7.1	Prohibits willfully interfering with or obstructing the Executive Director or any Agency employee in performing any lawful duty.	Applies generally to all air pollution sources
False or Misleading Statements ORCAA Rule 7.2	Prohibits any person from willfully making a false or misleading statement to the Board or its representative as to any matter within the jurisdiction of the Board.	Applies generally to all air pollution sources
Unlawful Reproduction or Alteration of Documents ORCAA Rule 7.3	Prohibits reproducing or altering, or causing to be reproduced or altered, any order, registration certificate or other paper issued by the Agency if the purpose of such reproduction or alteration is to evade or violate any provision of these Regulations or any other law.	Applies generally to all air pollution sources

Attachments

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	Applies to
Display of Orders and Certificates ORCAA Rule 7.4	Any order or registration certificate required to be obtained by these Regulations shall be available on the premises designated on the order or certificate. In the event that the Agency requires order or registration certificate to be displayed, it shall be posted. No person shall mutilate, obstruct or remove any order or registration certificate unless authorized to do so by the Board or the Executive Director.	The Approval Order issued in conjunction with this NOC approval must be retained on site.
General Requirements WAC 173-400-040(1)(c) ORCAA Rule 8.3	All emissions units are required to use reasonably available control technology (RACT).	Applies generally to all air pollution sources.
Visible Emissions WAC 173-400-040(2) ORCAA Rule 8.2(a)	Prohibits emissions with opacity of greater than 20% for more than three (3) minutes in any one hour.	Applies generally to all air pollution sources
Sulfur Dioxide WAC 173-400-040(7)	No person shall cause or allow the emission from any emissions unit in excess of one thousand ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based on the average of any period of sixty consecutive minutes.	Applies generally to facilities that emit Sulfur Dioxide.
Control Equipment Maintenance and Repair ORCAA Rule 8.8	ORCAA Rule 8.8 requires that all air contaminant sources keep any process and/or air pollution control equipment in good operating condition and repair.	Applies generally to all air pollution control devices.
Fallout WAC 173-400-040(3) ORCAA Rule 8.3(e)	Prohibits particulate emissions from any source to be deposited, beyond the property under direct control of the owner or operator of the source, in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material was deposited.	Applies generally to all air pollution sources.
Fugitive Emissions WAC 173-400-040(4)(a) ORCAA Rule 8.3(c)	~~The owner or operator of a~~ny emissions unit engaging in materials handling, construction, demolition or other operation which is a source of fugitive emission shall take reasonable precautions to prevent the release of air contaminants from the operation.	Applies generally to any activity that results in fugitive emissions.
Odor WAC 173-400-040(5) ORCAA Rule 8.5	ORCAA Rule 8.5 contains general requirements for controlling odors and a general prohibition of odors that unreasonably interfere with the use or enjoyment of a person's property.	Applies generally to all air pollution sources.
Emissions Detrimental to Persons or Property WAC 173-400-040(6) ORCAA Rule 7.6	Prohibits causing or allowing the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business.	Applies generally to all air pollution sources

Attachments

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	Applies to
Concealment and Masking WAC 173-400-040(8) ORCAA Rule 7.5	Prohibits installation or use of any device or means to conceal or mask emissions of an air contaminant, which causes detriment to health, safety, or welfare of any person, or causes damage to property or business.	Applies generally to all air pollution sources
Fugitive Dust WAC 173-400-040(9)	~~The owner or operator of~~ a source or activity that generates fugitive dust must take reasonable precautions to prevent that fugitive dust from becoming airborne and must maintain and operate the source to minimize emissions.	Applies to any activity that results in fugitive dust.
Excess Emissions Provisions WAC 173-400-107; WAC 173-400-108 ORCAA 8.7	Requires excess emissions be reported to the Agency as soon as possible and within 24 hours and establishes criteria qualifying excess emissions as unavoidable.	Applies generally to all air pollution sources
Record Keeping and Reporting. ORCAA Rule 8.11	Requires the following: 1. Maintenance of records on the nature and amounts of emissions and other related information as deemed necessary by ORCAA; 2. Reporting of emissions to ORCAA upon request.	Required of all facilities registered with ORCAA.
Particulate Standards for Process units ORCAA Rule 8.3(a) WAC 173-400-060	Prohibits emissions from any process unit in excess of 0.1 grain/dscf. EPA test methods from 40 CFR Appendix A shall be used should demonstration of compliance be required.	Applies generally to all stationary process units that exhaust to the atmosphere.
Particulate Standards for Combustion Units ORCAA Rule 8.3(a) WAC 173-400-050(1)	Prohibits emissions from any combustion unit in excess of 0.1 grain/dscf. EPA test methods from 40 CFR Part 60 Appendix A shall be used should demonstration of compliance be required.	Applies to the boiler.

Attachments

OLYMPIC REGION CLEAN AIR AGENCY

2940 Limited Lane NW - Olympia, Washington 98502 - 360-539-7610 – Fax 360-491-6308

FORM 1- NOTICE OF CONSTRUCTION

TO CONSTRUCT - INSTALL - ESTABLISH OR MODIFY AN AIR CONTAMINANT SOURCE

Form 1 Instructions:

1. Please complete all the fields below. **This NOC application is considered incomplete until signed.**
2. If the application contains any confidential business information, please complete a Request of Confidentiality of Records (www.orcaa.org/forms).
3. Duty to Correction Application: An applicant has the duty to supplement or correct an application. Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application must, upon becoming aware of such failure or incorrect submittal, promptly submit supplementary factors or corrected information.

Business Name: Frontier Construction Supply

Mailing Address: 11012 Canyon Road East, Suite 8

Physical Address of Project or New Source: 4101 East St. Rte 3 Shelton WA 98584

Billing Address: Same - Puyallup WA 98373

For ORCAA use only

File No: 1009
County No: 45
Source No: 28
Application No: 24NOC1648

Date Received: Received SEP 06 2024 ORCAA

Project or Equipment to be installed/established:

Anticipated startup date: 5 / 1 / 24 Is facility currently registered with ORCAA? Yes [X] No [ ]

This project must meet the requirements of the State Environmental Policy Act (SEPA) before ORCAA can issue final approval. Indicate the SEPA compliance option:

- [ ] SEPA was satisfied by _____ (government agency) on ___/ ___/ ___(date) - Include a copy of the SEPA determination
- [ ] SEPA threshold determination by _____ (government agency) is pending - Include a copy of the environmental checklist
- [X] ORCAA is the only government agency requiring a permit - Include ORCAA Environmental Checklist
- [ ] This project is exempt from SEPA per _____ (WAC citation).

Name of Owner of Business: Randy Jensen

Title: Vice President

Email: Randyj@fsfcs.com Phone: 253-686-0836

Authorized Representative for Application (if different than owner): General Mgr. Jean Charpentier

Title: GM

Email: Jeanc@fsfcs.com Phone: 253-686-1936

I hereby certify that the information contained in this application is, to the best of my knowledge, complete and correct.

Signature of Owner or Authorized Representative: (sign in Blue Ink)

Date: 5/30/2024

IMPORTANT: Do not send via email or other electronic means. ORCAA must receive Original, hardcopy, signed application and payment prior to processing application.

Agency Use Only

CONDITIONALLY APPROVED FOR CONSTRUCTION ONLY IN ACCORDANCE WITH RCW 70A.15, WAC 173-400 ORCAA REGULATIONS (SEE ATTACHED ADDENDUM FOR CONDITIONS OF APPROVAL)

10/30/2024
DATE

ORCAA