



SOLID WASTE
DISPOSAL
2900 S. GEIGER
BLVD.

February 16, 2016

Mr. Marc Crooks
WA Department of Ecology
Air Quality Program
300 Desmond Drive SE
Lacey, WA 98503

RE: PSD-88-1B permit clarification request

Dear Mr. Crooks,

The City of Spokane Waste-to-Energy (WTE) Facility is requesting clarification of the September 1, 1989 issued Prevention of Significant Deterioration (PSD)-88-1B permit, Approval Conditions 5, 6, and 8 which read as follows:

Condition 5:

85 *After the first fifteen months of operation, nitrogen oxides emissions from each incinerator stack shall not exceed 165 ppm on a dry basis corrected to seven percent oxygen for a eight hour average as measured by EPA Methods 1, 2, 3, 4, 7 and their applicable methods or a continuous monitoring systems that meets the requirements of Approval Condition 12.*

Condition 6:

92 *6. Carbon monoxide emissions from each incinerator stack shall not exceed 100 ppm on a dry basis corrected to seven percent oxygen for a eight hour average for more than five percent of the operating time in a month, or 100 ppm for a twenty four hour average or 86 tons per year.*

Condition 8:

98 *8. Opacity from each incinerator stack shall not exceed 10 percent for more than six minutes per hour as measured by a continuous monitoring systems which meets the requirements of Approval Condition 12.*

Clarification request

The City of Spokane requests:

1. The 8-hour average referenced in Approval Conditions 5 and 6 be clarified to specify an eight (8) hour block average to be consistent with the Spokane Regional Clean Air Agency (SRCAA) Air Operating Permit (AOP) emission limits, which are based on block averages: 3-hour, 4-hour, and 24-hour.
2. The 24-hour average referenced in Approval Conditions 6 be clarified to specify a twenty-four (24) hour block average, to be consistent with the SRCAA AOP emission limits, which are based on block averages: 3-hour, 4-hour, and 24-hour.

3. The 6-minute per hour reference in Approval Condition 8 be clarified to specify a six (6) minute block, to be consistent with the SRCAA AOP emission limits, which are based on six minute block average.

In addition, the Facility is requesting Ecology to revise Approval Conditions 17 and 26(b) which reads:

Condition 17:

126 17. The baghouses shall have a maximum effective air to cloth ratio of 4:1 and a spare set of bags (1/4 of the total number) shall be maintained on the premises.

*Condition 26 (as amended in the Department of Ecology letter, dated February 9, 1996):
(b) Only Natural gas shall be used in the auxiliary burners. The annual capacity factor for use of natural gas, as determined by 40 CFR 60.44(d) shall be less than 10%. IF the annual capacity factor of natural gas is greater than 10%, then the facility shall be subject to 40 CFR 60.44b.*

Revision request

The City of Spokane requests:

1. Removal of the requirement to have a spare set of bags (1/4 of the total number) on-site from Approval Condition 17. While the purpose behind the requirement may be protective, over 25 years of plant operation has proved otherwise. The facility should be allowed to maintain the number of spare bags in inventory that experience has indicated is necessary to properly maintain the baghouses. The reality has been that the large number of spare bags has been held in inventory for years and never used. Instead the plant has a proactive program to ensure proper bag condition and to replace bags on a planned schedule with brand new bags purchased as part of the project. In practice the requirement to have a large number of bags in inventory has turned into a counting exercise to ensure the requirement is met with no actual air quality value.
2. Removal of the 10% natural gas limit. The revision was originally made to clarify that the plant was not subject to 40 CFR Part 60, Subpart Db. Since that time, EPA has Subpart Db to clearly exempt MWCs. See 40 CFR 60.40b(k) for the Spokane plant. Condition 26(b) is now unnecessary and yet creates a paperwork obligation to track each unit's annual capacity factor.

If you should have any questions or would like to discuss the revision requests in greater detail, please contact Sarah Scott, Environmental Manager, at sscott@spokanecity.org or (509) 625-6541.

Sincerely,


Gina Dempsey
Plant Manager