



# Puget Sound Clean Air Agency

Notice of  
Construction No.

12344

Clean Air Agency

HEREBY ISSUES AN ORDER OF APPROVAL  
TO CONSTRUCT, INSTALL, OR ESTABLISH

Registration No. 12196  
Date

The installation of one Dupps 1200 Series cooker controlled by one existing cyclone, one existing vapor condenser, one cyclonic scrubber, one packed tower scrubber, and an existing SBECO thermal oxidizer.

OWNER

**Baker Commodities, Inc.**  
PO Box 58368  
Tukwila, WA 98138-1368

INSTALLATION ADDRESS

**Baker Commodities, Inc.**  
5795 S 130th Pl  
Tukwila, WA 98178

THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

1. Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Clean Air Agency to the applicant to install or establish the equipment, device or process described hereon at the INSTALLATION ADDRESS in accordance with the plans and specifications on file in the Engineering Division of the Puget Sound Clean Air Agency.
2. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.

## Specific Conditions:

3. The owner and/or operator shall not process more than 228 tons of raw material per day through the cooker. Monthly records shall be kept on site to verify compliance with this requirement.
4. The cyclonic scrubber and packed tower scrubber must be installed and operational within 180 days of commencing operation of the cooker. The specific maximum cfm ratings of these units will be submitted to the Agency upon installation and startup.
5. The owner and/or operator shall monthly inspect the integrity of the vapor collection ductwork for the rendering process. This includes looking for any corrosion, gaps, or leaks in piping and ducting associated with the cooker and cooker control devices. Any instances where the integrity is found to be compromised must be repaired as soon as practicable, and within 15 days of discovery. Until the repair is made, the owner and/or operator shall daily inspect for odors migrating beyond the property line to help prevent excess odors from escaping the building until the repair can be made. Daily inspections shall include walking around the facility property and using sight, sound, and smell to detect any potential odor migration. If odor migration is found during daily inspections, the facility shall take immediate corrective action to minimize impacts, which may include ceasing operations. A logbook shall be kept for documentation of all monthly integrity inspections and all daily odor inspections. For each inspection, the logbook shall include the date and time of the inspection, the name of the person conducting the inspection, and a list of all areas of compromised integrity that will require repair. Once the repair is made, the logbook shall also document the time and date of the repair.
6. All emissions from the cooker shall be captured and vented to the cyclone and vapor condenser, followed by the cyclonic scrubber and packed tower scrubber (once installed in accordance with Condition 4), and then the 7 MMBtu/hr Thermal Oxidizer. The presence of a compromise in the integrity of cooking equipment, air pollution control equipment, or associated ducting shall constitute a violation of this condition, unless that compromise has been documented as needing repair in the log required under

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## Condition 5.

7. The 7 MMBtu/hr thermal oxidizer shall be operated with a minimum combustion temperature set point of no less than 1,400 degrees F and the retention time shall be no less than 1.0 second. The thermal oxidizer temperature shall be continuously monitored and recorded. At a minimum, the operation and maintenance plan for the Thermal Oxidizer shall also include how the temperature measurement device is maintained in good working order.
8. Within 60 days of commencing initial startup of the cyclonic scrubber and packed tower scrubber, and then repeatedly once every 60 months at the latest from the previous test for VOC, NO<sub>x</sub>, TRS, SO<sub>2</sub>, and PM<sub>10</sub>, the owner and/or operator shall conduct a performance test to verify compliance with the following emissions standards:
  - a. VOC testing to demonstrate a 95% destruction efficiency across the thermal oxidizer – VOC testing shall be conducted in accordance with EPA Test Method 25 or 25A or an alternative method approved by the Agency. Testing to quantify exempt compounds, such as methane, shall be conducted in accordance with EPA Test Method 18 or an alternative method approved by the Agency.
  - b. 400 ppmv CO @ 3% oxygen at the outlet of the thermal oxidizer while fired on natural gas only - CO testing shall be conducted in accordance with EPA Test Method 10 or an alternative method approved by the Agency.
  - c. 30 ppmv NO<sub>x</sub> @ 3% oxygen at the outlet of the thermal oxidizer while fired on natural gas only - NO<sub>x</sub> testing shall be conducted in accordance with EPA Test Method 7E or an alternative method approved by the Agency.
  - d. 1.13 lbs of SO<sub>2</sub>/hr at the outlet of the thermal oxidizer - SO<sub>2</sub> testing shall be conducted in accordance with EPA Test Method 6C or an alternative method approved by the Agency.
  - e. TRS testing to demonstrate 95% reduction of TRS as measured across the cooker outlet and the thermal oxidizer inlet – TRS testing shall be conducted in accordance with EPA Test Method 16C or an alternate method approved by the Agency.
  - f. PM testing to demonstrate 95% reduction of PM as measured across the cooker outlet and the thermal oxidizer outlet – PM Testing shall be conducted using EPA Method 5 as modified by Puget Sound Clean Air Agency Board Resolution 540 dated August 11, 1983 or an alternative method approved by the Agency.

The owner and/or operator shall conduct testing in accordance with Section 3.07 of Puget Sound Clean Air Agency (PSCAA) Regulation I using the following test Methods:

Sampling sites and velocity traverse points shall be selected in accordance with EPA Test Method 1 or 1A. The gas volumetric flow rate shall be measured in accordance with EPA Test Method 2, 2A, 2C, 2D, 2F, 2G or 19. The dry molecular weight shall be determined in accordance with EPA Test Method 3, 3A or 3B. The stack gas moisture shall be determined in accordance with EPA Test Method 4.

Testing shall be performed while operating at or near maximum capacity of the rendering operation or under at another capacity that is approved by the Agency prior to conducting the performance test. During the performance test, the raw material process rate shall be monitored and recorded in tons per hour.

9. At least once per quarter during operation of the cooker, the owner and/or operator shall conduct visual observations of the Thermal Oxidizer exhaust. If any emissions are visible from the exhaust, the owner and/or operator shall conduct a visible emissions observation by a person certified in accordance with EPA Reference Method 9 (40 CFR 60, Appendix A). Such a test shall consist of a minimum of 30 minutes of opacity observations for the cooker. The owner and/or operator shall ensure 0% opacity from the cooker as measured with the Method 9 observation.

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10. A testing notification must be submitted to the Agency in accordance with Section 3.07 of Regulation I, 21 days before any compliance test required by this Order of Approval is conducted. The facility must submit a test plan with the notification that includes all process equipment operating data that will be collected during the test as well as the methods that will be used to collect the data. The test plan shall also include an explanation on the proposed testing capacity if the maximum plant operating capacity is not planned on being used during the test.
11. The results of each source test shall be submitted to the Agency within 60 days after completion of the source tests.
12. The owner or operator shall develop and maintain an Operation and Maintenance (O&M) plan for the cooker, vapor condenser, the cyclonic scrubber and packed tower scrubber, and the 7 MMBtu/hr Thermal Oxidizer. The O&M plan shall be developed and implemented per Agency's Regulation I. Additionally, the owner or operator shall establish a complaint response program as part of the O&M Plan. The program shall include a complaint phone line, criteria, and methods for establishing whether Baker Commodities, Inc. is the source of emissions related to the complaint, and a format for communicating results of investigation and advising complainants of corrective actions.
  - a. The owner or operator shall record and investigate complaints received regarding air quality as soon as possible, but no later than one working day after receipt.
  - b. The owner or operator shall correct any problems identified by these complaint investigations within 24 hours of identification or cease operation of the equipment until the problem is resolved;
  - c. Records of all complaints received regarding air quality issues shall include information regarding date and time of complaint(if known); name and address of complainant (if known); nature of the complaint(if known); investigation efforts completed and basis for conclusion reached; and date, time, and nature of any corrective action taken.
13. Odor Compliance
  - a. If the Control Officer or authorized representative of the Agency communicates to the owner or operator that they have detected an odor at level 2 or greater as defined in Agency's Regulation I, Section 9.11(b), beyond the property line that the Agency has documented to be attributable to or partially attributable to emissions from rendering facility, the owner and/or operator must follow the odor response plan developed under part b. of this condition.
  - b. The owner and/or operator shall develop an odor response plan and odor complaint log when complying with part a. of this condition, with the following elements:
    - i. Initiate an investigation as soon as possible, but no later than 12 hours after receipt of notice from the Control Officer or authorized representative of the Agency.
    - ii. Take corrective action to eliminate odors beyond the property line as soon as possible, but within 24 hours after receipt of the complaint from the Control Officer or authorized representative of the Agency.
    - iii. Develop a report for every odor complaint and investigation. The odor complaint and investigation report must include the following:
      1. The date and time of when the complaint was received.

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2. The date and time of when the investigation was initiated.
3. Location of communicated odor and area investigated (including information provided by the Control Officer and any other areas the investigation identifies).
4. Weather conditions during the complaint.
5. Description of complaint and investigation and if an odor was detected.
6. Actions taken in response to the complaint.
7. The date and time odors are no longer detected beyond the property line.

c. The owner or operator shall monitor at an accessible downwind location at or ~~near the property line~~ for detectable odors that are attributable or partially attributable to emissions from the cooker or cooker emission control devices once each calendar week. For at least one hour immediately prior to monitoring, the person performing the monitoring must remain in an atmosphere free of facility-related odors. Records of the monitoring shall be kept of the date, the time, the monitoring location, the wind direction at the time of the observation, and whether or not any odors were detected. If any odors from the cooker or ~~cooker emission control~~ devices are detected at the monitoring site during the monitoring or at any other time, the owner or operator shall immediately initiate corrective action to reduce the odor to Level 1 or less (as defined in Agency Regulation I, Section 9.11(b)) and record the nature of any corrective actions taken.

14. Each day of operation the owner or operator shall monitor and record:

- a. The times of each start-up and shutdown of the cooker contributing emissions to the cyclonic scrubber and packed tower scrubber.
- b. The times of each start-up and shutdown of cyclonic scrubber and packed tower scrubber.

15. The cyclonic scrubber and packed tower scrubber shall be fitted with instrumentation that shall include:

- a. liquid flow meters;
- b. calibrated pH measuring systems;
- c. calibrated ORP measuring systems;
- d. a gauge to measure the static pressure drop across the air side of each scrubbing stage;
- e. a water temperature gauge;
- f. a sampling port to allow testing of the quality of the exhaust air.

16. Within 30 days of startup, each monitoring instrument listed in Condition 15 shall have a placard near it describing the acceptable range for each parameter monitored or the instrument itself shall be so marked.

17. Each parameter monitored in Condition 15 shall be recorded continuously, no less than once per hour during any hour in which the units monitored are operated.

18. The pH of reagent entering the cyclonic scrubber and packed tower scrubber shall not exceed 10.0 and not fall below 4.0, or a pH range provided by the manufacturer.

19. ORP of reagent entering the cyclonic scrubber and packed tower scrubber shall be 575 mV or greater or as specified by the manufacturer.

20. All records required by this Order of Approval must be maintained onsite and available for inspection by agency personnel for at least two years from the date of generation.

21. The following records shall be kept onsite and up-to-date, and be made readily available to Agency personnel upon request at all times:

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- a. Compliance test reports.
- b. Records of quarterly visible emissions observations and any certified opacity readings that were required to be conducted by EPA Method 9.
- c. Amount of raw materials processed per month.
- d. A copy of the odor complaint log and odor response plan.
- e. A written log showing corrective actions taken to maintain compliance with this Order of Approval. Each log entry must include date, time and description of any and all corrective action taken.
- f. The Operation and Maintenance (O&M) plan.
- g. Records of Natural Gas combusted in the thermal oxidizer per month.

22. The Agency shall be notified, in writing, within 30 days of the end of the month in which an exceedance of any emissions limitation and standard identified in these permit conditions is discovered.

## APPEAL RIGHTS

Pursuant to Puget Sound Clean Air Agency's Regulation I, Section 3.17 and RCW 43.21B.310, this Order may be appealed to the Pollution Control Hearings Board (PCHB). To appeal to the PCHB, a written notice of appeal must be filed with the PCHB and a copy served upon Puget Sound Clean Air Agency within 30 days of the date the applicant receives this Order.

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Blaine Nesbit  
Reviewing Engineer

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John Dawson  
Engineering Manager