

Order of Approval No. NSRP-12-YCHI-25

For the installation and operation of a hop pellet handling and processing system, including associated cyclone and baghouse, and a natural gas-fired process heater (boiler), for a new extraction plant (Extract Plant 3).

IN THE MATTER OF approving a project which establishes a new air contaminant source at Yakima Chief Hops Inc., in Sunnyside, WA. **THIS ORDER OF APPROVAL IS HEREBY ISSUED TO:**

Applicant/Permittee: Yakima Chief Hops Inc.
Hops processing

Located at: 555 West South Hill Road (West Facility)
Sunnyside, WA 98944

Contact: Yakima Chief Hops, LLC
Art Ortega – Sr. Director of CSR and Regulatory Compliance
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IN COMPLIANCE WITH THE PROVISIONS OF THE REVISED CODE OF WASHINGTON (RCW) CHAPTER 70A.15 WASHINGTON CLEAN AIR ACT SECTION 2210, WASHINGTON ADMINISTRATIVE CODE (WAC) 173-400-110 and WAC 173-460-040.

ISSUE DATE: September 2, 2026.

THIS ORDER OF APPROVAL IS SUBJECT TO THE FOLLOWING CONDITIONS:

Installation and operation of the equipment must be conducted in compliance with all data and specifications, including all additional information submitted subsequent to the Notice of Construction (NoC) application under which this Order of Approval is issued unless otherwise specified herein. The conditions and limitations of this Order of Approval are attached as follows:

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1.0 GENERAL INFORMATION

1.1 Definitions

The following terms as used in this order shall be defined as set forth in this section except where otherwise defined at the time of use:

- a. **"Acceptable Source Impact Analysis"** means a procedure that compares maximum incremental impacts to Ambient Air with applicable ASILs as defined in WAC 173-460-020(2) {app.leg.wa.gov/wac/default.aspx?cite=173-460-020}.
- b. **"Acceptable Source Impact Level"** means a screening concentration of a Toxic Air Pollutant in the ambient air as defined in WAC 173-460-020(2) {app.leg.wa.gov/wac/default.aspx?cite=173-460-020} and set forth in WAC 173-460-150 {app.leg.wa.gov/wac/default.aspx?cite=173-460-150}.
- c. **"Act of Nature"** means an event caused exclusively by natural forces such as an earthquake, flood, landslide, ice storm, volcanic eruption, or tornado.
- d. **"Agency"** means the Yakima Regional Clean Air Agency.
- e. **"Air Contaminant"** means dust, smoke, and other particulate matter, fumes, mist, vapor, gas, and/or odorous substance as defined in RCW 70A.15.1030(1) {app.leg.wa.gov/rcw/default.aspx?cite=70A.15.1030}.
- f. **"Air Pollutant"** means Air Contaminant.
- g. **"Air Pollution Control Officer"** means the individual appointed by an air pollution control authority board of directors to observe and enforce the provisions of the WCAA and all orders, ordinances, resolutions, or rules and regulations of the authority pursuant to RCW 70A.15.2300 {app.leg.wa.gov/rcw/default.aspx?cite=70A.15.2300}.
- h. **"Ambient Air"** means the natural state of atmospheric air in the outdoor environment.
- i. **"Applicant"** means the party having submitted a Notice of Construction to the YRCAA.
- j. **"Attainment Area"** means a geographic area designated by EPA at 40 C.F.R. Part 81 as having attained the National Ambient Air Quality Standard for a given criteria pollutant as defined in WAC 173-400-030(10) {app.leg.wa.gov/wac/default.aspx?cite=173-400-030}.
- k. **"Best Available Control Technology"** means an emission limitation based on the maximum degree of reduction for each regulated air pollutant determined by the Agency as defined in WAC 173-400-030(13) {app.leg.wa.gov/wac/default.aspx?cite=173-400-030}.
- l. **"Best Available Control Technology for Toxics"** means the Best Available Control Technology as applied to Toxic Air Pollutants as defined in WAC 173-460-020(3) {app.leg.wa.gov/wac/default.aspx?cite=173-460-020}.
- m. **"Best Available Retrofit Technology"** means an emission limitation based on the degree of reduction achievable through the application of the best system of continuous emission reduction for each pollutant emitted by an existing stationary facility as defined in WAC 173-400-030(14) {app.leg.wa.gov/wac/default.aspx?cite=173-400-030}.
- n. **"British Thermal Unit"** means a quantity of heat approximately equal to 1,055 joules or 252 gram calories.
- o. **"Business Day"** means any weekday (Monday through Friday) that is not an Agency holiday.
- p. **"Calendar Day"** means any day that appears on a calendar including weekdays, weekend days, and holidays.
- q. **"Code of Federal Regulations"** means the regulations issued by federal agencies under the authority of the USC.

- r. **"Criteria Air Pollutant" or "Criteria Pollutant"** means any air pollutant set forth in 40 CFR 50 including carbon monoxide (CO), lead (Pb), particulate matter (PM_{2.5} and PM₁₀), ozone (O₃), nitrogen dioxide (NO₂), and sulfur dioxide (SO₂) {www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-50?toc=1}.
- s. **"Day"** means Calendar Day.
- t. **"Ecology"** means the Washington Department of Ecology.
- u. **"Emission Unit"** means any part of a Source that emits or has the potential to emit any pollutant subject to regulation under the FCAA or WCAA as defined in WAC 173-400-030(31) {app.leg.wa.gov/wac/default.aspx?cite=173-400-030}.
- v. **"Emergency"** means a situation arising from a sudden and reasonably unforeseeable event beyond the control of the Permittee including an Act of Nature, war, terrorist attack, explosion, or civil unrest that requires corrective action to restore normal operation and results in an unavoidable increase in emissions. An emergency does not include situations resulting from improperly designed equipment, a lack of preventive maintenance, careless or improper operation, or operator error.
- w. **"Environmental Protection Agency"** means the federal agency established to develop and enforce environmental protection standards consistent with national environmental goals pursuant to 42 USC 4321 {[uscode.house.gov/view.xhtml?req=\(title:42%20section:4321%20edition:prelim\)](http://uscode.house.gov/view.xhtml?req=(title:42%20section:4321%20edition:prelim))}.
- x. **"Excess emissions"** means emission of an air pollutant in excess of any emission limit established in this Order, including emission rates and visible emission limits.
- y. **"Exterior Property Boundary"** means the combined outer property boundaries where the adjacent property is not in common ownership with that of the Facility.
- z. **"Facility"** means the parcel, or contiguous parcels under the same or related ownership or control, upon which the proposed project is located.
- aa. **"Federal Clean Air Act"** means the set of national laws enacted to protect and enhance the quality of the Nation's air resources so as to promote the public health and welfare and provide assistance to State and local governments in connection with the development and execution of their air pollution prevention and control programs as set forth in 42 USC 85 {uscode.house.gov/view.xhtml?path=/prelim@title42/chapter85&edition=prelim}.
- bb. **"Good Housekeeping"** means taking one or more actions—often in accordance with manufacturer or industry best practices—to reduce the quantity of organic compounds and/or odors emitted including, but not be limited to, the following: (i) preventing and promptly cleaning up spills; (ii) preventing evaporation (e.g. ensuring containers are properly sealed and not left open; and (iii) storing and disposing of waste materials in a manner that reduces or eliminates emissions.
- cc. **"Hazardous Air Pollutant"** means any air pollutant set forth in 42 USC 7412 {[uscode.house.gov/view.xhtml?req=\(title:42%20section:7412%20edition:prelim\)](http://uscode.house.gov/view.xhtml?req=(title:42%20section:7412%20edition:prelim))}.
- dd. **"Major Source"** means any Stationary Source, or group of Stationary Sources belonging to a single major industrial grouping (i.e. have the same two-digit code) described in the 1987 *Standard Industrial Classification Manual*, that meets the applicability criteria of a major source, as set forth in WAC 173-401-200(19) {app.leg.wa.gov/wac/default.aspx?cite=173-401-200} and 40 CFR 52.21(b)(1) {www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-52/subpart-A/section-52.21}.
- ee. **"Major Stationary Source"** means Major Source.

- ff. **"Minor Source"** means a Source that does not meet the applicability criteria of a Major Source as defined in applicable federal or state air quality regulations, including WAC 173-401-200(19) {app.leg.wa.gov/wac/default.aspx?cite=173-401-200} and 40 CFR 52.21(b)(1) {www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-52/subpart-A/section-52.21}.
- gg. **"Modification"** means any physical change in, or change in the method of operating, a Stationary Source that increases the amount of any Air Contaminant emitted by such Source or results in the emission of any Air Contaminant not previously emitted consistent with the definitions set forth in RCW 70A.15.1030(16) {app.leg.wa.gov/rcw/default.aspx?cite=70A.15.1030} and 42 CFR 7411(a)(4) {[uscode.house.gov/view.xhtml?req=\(title:42%20section:7411%20edition:prelim\)](http://uscode.house.gov/view.xhtml?req=(title:42%20section:7411%20edition:prelim))}.
- hh. **"Momentary"** means temporary and continuing for a very short period of time (i.e. occurring briefly).
- ii. **"National Ambient Air Quality Standards"** means the limits established by the U.S. Environmental Protection Agency for Criteria Pollutants pursuant to 42 USC 7409 {[uscode.house.gov/view.xhtml?req=\(title:42%20section:7409%20edition:prelim\)](http://uscode.house.gov/view.xhtml?req=(title:42%20section:7409%20edition:prelim))}.
- jj. **"New Source Review"** means an analysis conducted by the Agency of a proposed new Source (described in a Notice of Construction) consistent with the definition set forth in WAC 173-400-030 {app.leg.wa.gov/wac/default.aspx?cite=173-400-030}.
- kk. **"Nonattainment Area"** means a geographic area designated by EPA at 40 C.F.R. Part 81 as exceeding a National Ambient Air Quality Standard (NAAQS) for a given criteria pollutant. An area is nonattainment only for the pollutants for which the area has been designated nonattainment as defined in WAC 173-400-030(58) {app.leg.wa.gov/wac/default.aspx?cite=173-400-030}.
- ll. **"Notice of Construction"** means a written application submitted to the Agency for the construction of a new Source, the modification of an existing Source, or the replacement or substantial alteration of control technology at an existing Source consistent with the definition set forth in WAC 173-400-030(84) {app.leg.wa.gov/wac/default.aspx?cite=173-400-030}.
- mm. **"Operations and Maintenance Plan"** means one or more documents for each Emission Unit, or group of operationally equivalent Emission Units, comprised of not less than: (i) Procedures for proper operation and maintenance of the Emission Unit and associated air pollution control device(s) necessary to comply with emission limits and other conditions, including maintenance schedules, control measures for fugitive emissions, fallout, and odors—when applicable, recordkeeping, and training; (ii) Corrective actions to be taken when required; (iii) Procedures to be used during inspection of the Emission Unit and/or air pollution control devices; (iv) Training; and (v) Recordkeeping.
- nn. **"Order"** means this Order of Approval.
- oo. **"Order of Approval"** means a regulatory order issued by a permitting authority to approve a Notice of Construction application (e.g. this document) as set forth in RCW 70A.15.2210(3) {app.leg.wa.gov/rcw/default.aspx?cite=70A.15.2210} and consistent with the definition set forth in WAC 173-400-030(64) {app.leg.wa.gov/wac/default.aspx?cite=173-400-030}.
- pp. **"Owner/Operator"** means any person who owns, leases, operates, controls, or supervises a Source consistent with the definition set forth in 42 USC 7411(a)(5) {[uscode.house.gov/view.xhtml?req=\(title:42%20section:7411%20edition:prelim\)](http://uscode.house.gov/view.xhtml?req=(title:42%20section:7411%20edition:prelim))}.
- qq. **"Permittee"** means the party to whom an Order of Approval or Air Operating Permit is issued or any subsequent Owner/Operator of the Source.

- rr. **"Pollution Control Hearings Board"** means the Washington State board granted jurisdiction to hear and decide appeals from air pollution control authorities pursuant to Chapter 43.21B RCW {app.leg.wa.gov/rcw/default.aspx?cite=43.21B}.
- ss. **"Portable Source"** means a Source capable of being transported to various locations (e.g. portable crusher, portable asphalt plant) consistent with the definition set forth in RCW 70A.15.1030(75) {app.leg.wa.gov/rcw/default.aspx?cite=70A.15.1030}, excluding mobile sources (e.g. motor vehicles, non-road engines, non-road vehicles) as defined in 40 USC 51.50 {www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-51/subpart-A}.
- tt. **"Potential to Emit"** means the maximum capacity of a source to emit a pollutant under its physical and operational design or any physical or operational limitation that is enforceable, excluding secondary emissions, consistent with the definition set forth in WAC 173-400-030(76) {<https://app.leg.wa.gov/wac/default.aspx?cite=173-400-030>}.
- uu. **"Project"** means the construction or modification proposed in the Notice of Construction submitted by the applicant.
- vv. **"Records"** means all reports, logs, notifications, written communications, and other documents and all sampling, monitoring, and other data, whether in paper or electronic form, required under this Order.
- ww. **"Responsible Official"** means one of the following consistent with 40 CFR 70.2 {<http://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-70/section-70.2>}: (1) For a corporation, a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function; (2) For a partnership, a general partner; (3) For a sole proprietorship, the proprietor; or (4) For a municipality, state, federal, or other public agency, either a principal executive officer, ranking elected official, or for federal agencies, the chief executive officer for a principal geographic unit.
- xx. **"Revised Code of Washington"** means the permanent laws enacted by the Washington State legislature {app.leg.wa.gov/rcw}.
- yy. **"Small Quantity Emission Rate"** means a level of emissions below which dispersion modeling is not required to demonstrate compliance with acceptable source impact levels set forth in WAC 173-460-150 {app.leg.wa.gov/wac/default.aspx?cite=173-460-150} consistent with the definition set forth in WAC 173-460-020(7) {app.leg.wa.gov/wac/default.aspx?cite=173-460-020}.
- zz. **"Source"** means all of the emission units, including quantifiable fugitive emissions, located on one or more contiguous or adjacent properties and under the control of the same person, or persons under common control, whose activities are ancillary to the production of a single product or functionally-related group of products as defined in RCW 70A.15.1030(23) {<https://app.leg.wa.gov/rcw/default.aspx?cite=70A.15.1030>}.
- aaa. **"State Environmental Policy Act"** means the set of state laws enacted to prevent or eliminate damage to the environment and biosphere as set forth in Chapter 43.21C RCW {app.leg.wa.gov/rcw/default.aspx?cite=43.21C} and Chapter 197-11 WAC {app.leg.wa.gov/wac/default.aspx?cite=197-11}.
- bbb. **"Stationary Source"** means a Source that is a building, structure, facility, or installation that emits or may emit any air contaminant consistent with the definition set forth in RCW 70A.15.1030(24) {app.leg.wa.gov/rcw/default.aspx?cite=70A.15.1030} and 42 USC 7411(3) {[uscode.house.gov/view.xhtml?req=\(title:42%20section:7411%20edition:prelim\)](http://uscode.house.gov/view.xhtml?req=(title:42%20section:7411%20edition:prelim))}.
- ccc. **"Synthetic Minor Source"** means a Source with a PTE limited below applicable thresholds by means of an enforceable order, rule, or approval condition consistent with

- the definition set forth in WAC 173-400-030(93) {app.leg.wa.gov/wac/default.aspx?cite=173-400-030}.
- ddd. **"Toxic Air Pollutant"** means any pollutant set forth in WAC 173-460-150 {app.leg.wa.gov/wac/default.aspx?cite=173-460-150} consistent with the definition set forth in WAC 173-400-030(96) {app.leg.wa.gov/wac/default.aspx?cite=173-400-030}.
- eee. **"Uncombined Water"** means water in a gaseous state that is not bound to a compound and does not contain dissolved solids (e.g. steam).
- fff. **"Uniform Resource Locator"** means the address of a unique resource (e.g. document, page, image) available on the Internet, in the form *scheme://domain/path/parameters* (e.g. <http://app.leg.wa.gov/rcw/default.aspx?cite=70A.15.2210>) and commonly entered into the address bar of an "Internet browser" application. Also known as a "web address".
- ggg. **"United States Code"** means the consolidation and codification of the general and permanent laws enacted by the Congress of the United States {uscode.house.gov}.
- hhh. **"Volatile Organic Compound"** means a chemical that evaporates easily (e.g. paint, lacquer, solvent, adhesive).
- iii. **"Washington Administrative Code"** means the regulations issued by state agencies under the authority of the RCW {app.leg.wa.gov/wac/default.aspx}.
- jjj. **"Washington Clean Air Act"** means the set of state laws enacted to preserve, protect, and enhance the air quality for current and future generations as set forth in Chapter 70A.15 RCW {app.leg.wa.gov/rcw/default.aspx?cite=70A.15}.
- kkk. **"Washington Department of Ecology"** means the state agency established to manage and develop the air and water resources of the state and to carry out a coordinated program of pollution control as set forth in Chapter 43.21A RCW {app.leg.wa.gov/rcw/default.aspx?cite=43.21A}.
- lll. **"Written"** means a document, excluding voice mail, text, and electronic mail messages, comprised of visible letters and characters, signed by a Responsible Official, and provided to the recipient by hand delivery, the U.S. Postal Service, or a commercial carrier or delivery service.
- mmm. **"Yakima Regional Clean Air Agency"** means the local air pollution control authority for Yakima County established pursuant to RCW 70A.15.1500 {app.leg.wa.gov/rcw/default.aspx?cite=70A.15.1500}.
- nnn. **"YRCAA Regulation 1"** means the regulations adopted by the Board of Directors of the YRCAA pursuant to RCW 70A.15.2040(1) {app.leg.wa.gov/rcw/default.aspx?cite=70A.15.2040}.

1.2 Acronyms

The following acronyms as used in this order shall mean the terms set forth in this section and defined in the prior section:

- | | | | |
|----|--------|---|------------------------------------|
| a. | APCO | – | Air Pollution Control Officer |
| b. | ASIL | – | Acceptable Source Impact Level |
| c. | BACT | – | Best Available Control Technology |
| d. | BART | – | Best Available Retrofit Technology |
| e. | BTU | – | British Thermal Unit |
| f. | CAM | – | Compliance Assurance Monitoring |
| g. | CAP(s) | – | Criteria Air Pollutant(s) |
| h. | CFR | – | Code of Federal Regulations |

i.	EPA	–	Environmental Protection Agency
j.	FCAA	–	Federal Clean Air Act
k.	HAP(s)	–	Hazardous Air Pollutant(s)
l.	NAAQS	–	National Ambient Air Quality Standards
m.	NESHAP	–	National Emission Standards for Hazardous Air Pollutants
n.	NO	–	Nitric Oxide
o.	NO ₂	–	Nitrogen Dioxide
p.	NO _x	–	Nitrogen Oxides (includes NO and NO ₂)
q.	NSR	–	New Source Review
r.	NSPS	–	New Source Performance Standards
s.	O&M	–	Operations and Maintenance
t.	Pb	–	Lead
u.	PCHB	–	Pollution Control Hearings Board
v.	PM _{2.5}	–	Particulate Matter less than 2.5 microns in diameter
w.	PM ₁₀	–	Particulate Matter less than 10 microns in diameter (includes PM _{2.5})
x.	PSD	–	Prevention of Significant Deterioration
y.	PTE	–	Potential to Emit
z.	RCW	–	Revised Code of Washington
aa.	SEPA	–	State Environmental Policy Act
bb.	SO ₂	–	Sulfur Dioxide
cc.	SO _x	–	Sulfur Oxides (includes SO ₂)
dd.	SQER	–	Small Quantity Emission Rate
ee.	TAP(s)	–	Toxic Air Pollutant(s)
ff.	tBACT	–	Best Available Control Technology for Toxics
gg.	TPY	–	Tons per year
hh.	URL	–	Uniform Resource Locator
ii.	USC	–	United States Code
jj.	VOC	–	Volatile Organic Compound
kk.	WAC	–	Washington Administrative Code
ll.	WCAA	–	Washington Clean Air Act
mm.	YR1	–	YRCAA Regulation 1
nn.	YRCAA	–	Yakima Regional Clean Air Agency

2.0 SOURCE DESCRIPTION

- 2.1 Yakima Chief Hops Inc., hereafter referred to as the Permittee, Facility, Source or YCHI, is the owner and operator of a hop processing and extraction facility located at 555 West South Hill Road, in Sunnyside, Washington. YCHI receives, stores, and processes hops into pellets, concentrated hop extracts, and other specialized brewing ingredients for distribution to breweries. Facility operations include pelletizing, milling, CO₂ extraction, packing, refrigerated storage, and material transfer.
- 2.2 The Permittee submitted a Notice of Construction (NoC) application on December 29, 2025, (NSRP-12-YCHI-25), requesting approval for the installation and operation of air emissions generating equipment and associated air emissions control equipment for a new extraction plant (Extract Plant 3) within an existing building. A Google Earth view of the Facility and site plan are shown in Figures 1 and 2, respectively.

- 2.3 The process at Extract Plant 3 is as follows: raw hop pellets are transferred and crumbled prior to being conveyed to the extraction vessels for processing. The extraction process uses supercritical carbon dioxide (CO₂) to produce hops extract. Following extraction, spent pellets are removed by vacuum transfer to a designated collection bin for disposal or re-pelletization. Particulate emissions are generated during pellet handling, transfer, and size reduction (crumbler) operations prior to extraction. These emissions are captured by a cyclone separator and subsequently routed to a baghouse for final filtration prior to discharge to the atmosphere. A natural gas-fired process heater (boiler) provides heat necessary to support the extraction process. The process flow diagram is shown in Figure 3.
- 2.4 This Order of Approval (Order) evaluates and authorizes the installation and operation of the air emissions generating equipment and activities, and associated air emissions control equipment and measures associated with Extract Plant 3 (the project). This equipment is identified in Table 1 of this Order. Figures 4 through 7 depict equipment associated with Extract Plant 3.
- 2.5 Additionally, the spent pellet cyclone/filter (VAC-U-MAX, Unit #30), spent pellet blower (Gardner Denver, Unit #31), and associated spent material airlock (Ancaster Conveying Systems, Unit #32), shown in Figure 3, were previously authorized under Order No. NSRP-22-YCH-21 and have been relocated from Extract Plant 2 to Extract Plant 3 for spent pellet handling operations. Their air emissions were previously evaluated under Order NSRP-22-YCH-21 and are not re-evaluated in this Order. The spent pellet cyclone/filter separates spent pellet solids from the conveying air stream. Separated solids are discharged through the associated airlock for collection and repurposing as cattle feed, while the filtered air stream is discharged through the spent pellet blower to the atmosphere. Figure 8 depicts a photo of this equipment.

3.0 DETERMINATIONS

- 3.1 The installation and operation of the air emissions generating equipment and activities, and air emissions control equipment and measures identified in Table 1, associated with Extract Plant 3 at this Facility, constitute a new source of air contaminants that results in an increase in the Facility's potential to emit air contaminants, which exceeds the applicable pollutant exemption levels listed in WAC 173-400-110(5), Table 110(5). Therefore, the Facility is required to obtain an Order of Approval (Order) pursuant to the Revised Code of Washington (RCW) 70A.15.2210, WAC 173-400-110 and WAC 173-460-040.
- 3.2 Air emissions from this project include criteria air pollutants (CAPs), and volatile organic compounds (VOCs), some of which are classified as hazardous air pollutants (HAPs) and toxic air pollutants (TAPs), defined by the Federal Clean Air Act (FCAA) and Washington Administrative Code (WAC) 173-460-150, respectively.
- 3.3 This project is subject to the requirements of the State Environmental Policy Act (SEPA). For this project, SEPA review requirements were satisfied through an existing Mitigated Determination of Non-Significance (MDNS), issued by the City of Sunnyside with File Number SEP 2021-0219, on July 28, 2021. The applicability of this MDNS to the proposed project was confirmed by the City of Sunnyside through its signature dated December 23, 2025.

- 3.4 A 15-day public notice for this NoC application was published on YRCAA website on March 9, 2026, pursuant to RCW 70A.15.2210 and WAC 173-400-171.
- 3.5 The Facility is located in an area designated as in attainment with all state and federal air quality standards for criteria pollutants, as defined in 40 CFR 81.348.
- 3.6 The Facility is classified as an area source (minor source) based on its potential CAPs and HAPs emissions that fall below the major source thresholds established under Section 501 of the FCAA.
- 3.7 The Facility is not subject to the Compliance Assurance Monitoring (CAM) requirements pursuant to 40 CFR Part 64 as it is not a major stationary source.
- 3.8 The Facility is not subject to the Prevention of Significant Deterioration (PSD) permitting requirements under WAC 173-400-700 through 173-400-750, as it is not a major stationary source.
- 3.9 The natural gas-fired process heater (boiler) used in Extract Plant 3 is not subject to the requirements of 40 CFR Part 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, pursuant to 40 CFR 60.40c(a), as the boiler has a heat capacity of less than 10 MMBtu/hr.
- 3.10 The natural gas-fired process heater (boiler) used in Extract Plant 3 is not subject to the requirements of 40 CFR Part 63 Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, pursuant to 40 CFR 63.11195(e), as the boiler is defined as a gas-fired boiler.
- 3.11 This project is subject to the requirements of RCW 70A.15.2210, WAC 173-400-113 and WAC 173-460-060, which require application of Best Available Control Technology (BACT) and toxic BACT (t-BACT) for air pollutants not previously emitted or for which emissions would increase as a result of the new source or modification. The Facility meets these requirements by employing BACT and t-BACT, provided the conditions set forth in this Order are met.
- 3.12 This project is subject to the requirements of WAC 173-460-040, as installation and operation of Extract Plant 3 require submittal of a NoC application under WAC 173-400-110, and actual pre-control emissions exceed the applicable de minimis emission threshold listed in WAC 173-460-150.
- 3.13 In accordance with WAC 173-460-080, an acceptable source impact level (ASIL) analysis was completed for this project. TAPs emissions were evaluated using the Small Quantity Emission Rate (SQER) screening method. After application of t-BACT, emissions of all TAPs were less than the SQER thresholds listed in WAC 173-460-150, thereby satisfying the ASIL analysis requirement for those pollutants.
- 3.14 Air emissions associated with this project are provided in Appendix A. Air emissions were calculated utilizing emission factors obtained from U.S. Environmental Protection Agency (EPA) “AP-42” along with equipment specifications.

- 3.15 The Facility is subject to the annual Registration Program pursuant to WAC 173-400-099 and YRCAA Regulation 1, Section 4.01. The Facility will be classified and assessed fees in accordance with the applicable YRCAA registration classification and fee schedule.

THEREFORE, pursuant to the authority granted under Chapter 70A.15 RCW, YRCAA hereby issues this Order of Approval for the Notice of Construction submitted (including all detailed plans, specifications, and other information submitted) for this Facility, subject to the conditions that follow.

4.0 AUTHORIZED EQUIPMENT

- 4.1 This Order authorizes the installation and operation of the equipment identified in Table 1 at the location specified herein, in accordance with the information submitted to YRCAA in the NoC application. Table 2 summarizes the specifications of the equipment.

Table 1 – Authorized equipment

ID No. ¹	Air emissions generating equipment/activity	Associated air emissions control equipment/measure
EU1	Hop pellet handling and processing system ²	Horizontal cyclone and baghouse
EU2	Process heater (boiler) ³	Natural gas combustion

¹ EU stands for Emission Unit.

² For purposes of this Order, EU1 consists of the Product Hopper #1, Pellet Crumbler #2, Horizontal Cyclone (Aerodyne GPC-15) #3, Cyclone Air Lock #4, Pellet Fan #5 and Baghouse (Donaldson FB24) Filter #6, shown in Figure 3.

³ EU2 is marked as Emission Point #3 in Figure 3.

Table 2 – Authorized equipment specifications

ID No.	Unit No. ¹	Equipment/Activity	Manufacturer, Model, Serial No.	Specifications
EU1	3	Horizontal cyclone	Aerodyne, GPC-15, 5540-01-01	Airflow rate = 729 cubic feet per minute (cfm)
	5	Pellet Fan	New York Blower, 2006B10, 2026-02338	Airflow rate = 729 cfm Efficiency = 54.8%
	6	Baghouse	Donaldson Torit, FB-24, N/A ²	Airflow rate = 729 cfm Total PM emission level = 0.004 grain per dry standard cubic foot (grain/dscf)
EU2	29	Process heater (boiler)	Navien, NPE-240S2(NG), 2089A2553029B25	Heat input = 199,900 Btu/hr

¹ Unit No. corresponds to equipment number shown in Figure 3.

² Not defined by manufacturer or provided in NoC application materials.

- 4.2 In addition to the equipment identified in Tables 1 and 2, this Order recognizes the relocation of the spent pellet cyclone/filter (Unit #30), associated airlock (Unit #32), and spent pellet blower (Unit #31), previously approved under Order NSRP-22-YCH-21 and formerly associated with Extract Plant 2. The air emissions associated with these units were previously evaluated under Order NSRP-22-YCH-21 and are not re-evaluated in this Order.

- 4.3 Appendix B provides an informational inventory of equipment associated with Extract Plant 3. The appendix includes equipment that is authorized under this Order, ancillary equipment, and equipment previously authorized under Order NSRP-22-YCH-21 and relocated to Extract Plant 3. Equipment shown in Appendix B that is not identified in Table 1 is not separately identified as an emission unit under this Order and is not subject to the emission limits, operating, monitoring, or recordkeeping requirements of this Order solely because it's shown in Appendix B.

5.0 EMISSION LIMITS

- 5.1 Air emissions from operation of equipment listed in Table 1 shall not exceed the emission limits shown in Table 3 during any consecutive 12-month period. These emission limits are based on potential to emit with control.

Table 3 – Extract Plant 3 emission limits

Equipment	Pollutant(s)	Actual emissions ton/year	Emission limit ¹ ton/year
Baghouse	PM/PM ₁₀ /PM _{2.5}	0.10	0.11
Process heater (boiler)	NOx	7.68E-02	8.34E-02
	CO	6.45E-02	7.00E-02
	PM/PM ₁₀ /PM _{2.5}	5.83E-03	6.34E-03
	Lead	3.84E-07	4.17E-07

¹ Emission limit obtained from PTE/Allowable emission rate in Appendix A.

Table 3 summarizes the principal emission limits for this project. The complete list of air contaminants evaluated for this project for each EU and their corresponding allowable annual emission rates are provided in Appendix A. For pollutants not specifically identified in Table 3, the allowable emission rates in Appendix A constitute the applicable emission limits under this Order.

- 5.2 Visible emissions from equipment listed in Table 1 shall not exceed twenty percent (20%) opacity, excluding uncombined water vapor, for more than three (3) minutes in any one-hour period, as determined in accordance with Ecology Method 9A (Method 9A).

6.0 OPERATING LIMITS AND REQUIREMENTS

- 6.1 The Permittee shall not operate the hop pellet handling and processing system, identified as EU1 in Table 1, unless the associated cyclone and baghouse are properly installed, connected, and operational. The cyclone and baghouse shall be used to control particulate emissions generated during system operation. Bypassing either control equipment is prohibited.
- 6.2 The cyclone and baghouse shall be installed and physically connected to the hop pellet handling and processing system through ductwork designed to capture emissions at the point of generation during system operation. Temporary connections, disconnected ductwork sections, bypassed systems, or incomplete emission capture components are prohibited during hop pellet handling and processing system operation.

- 6.3 The baghouse shall be equipped with a pressure drop gauge capable of measuring the pressure differential across the filter system. The gauge must be properly installed and fully operational at any time the filtration system is in use. The gauge must be installed in a location that is easily visible and accessible to any person monitoring the pressure drop gauge.
- 6.4 The hop pellet handling and processing system shall not be operated unless the baghouse is fully operational and functioning within the acceptable pressure drop range as recommended by Donaldson or the filter manufacturer.
- 6.5 The hop pellet handling and processing system shall not be operated if the cyclone and baghouse are not properly maintained as recommended by Aerodyne and Donaldson or the filter manufacturer, or if the equipment is malfunctioning.
- 6.6 The Permittee shall clearly post or mark the acceptable pressure drop range for the baghouse in a location that is easily visible and accessible to any person monitoring the pressure drop gauge (e.g. on or beside the gauge). The posted range shall reflect the specification recommended by Donaldson or the filter manufacturer. The posted range shall serve as a reference to identify when the system is operating outside of normal parameters.
- 6.7 The baghouse shall be equipped with manufacturer-specified filter media (e.g. cartridges) during operation of the hop pellet handling and processing system. The filter media shall be designed and rated by the manufacturer to achieve a maximum outlet particulate matter concentration of 0.004 grains per dry standard cubic foot (gr/dscf).
- 6.8 The cyclone and baghouse shall be operated at an airflow rate not exceeding the value specified in Table 2, consistent with the equipment specifications submitted with the NoC application and emissions calculations evaluated in this Order.
- 6.9 The Navien NPE-240S2(NG) process heater (boiler) utilized in Extract Plant 3 shall be fired on natural gas only.
- 6.10 The maximum rated heat input capacity of the process heater (boiler) shall not exceed 0.1999 million Btu per hour (MMBtu/hr).
- 6.11 The Permittee shall develop, implement and maintain an Operations and Maintenance (O&M) plan for equipment listed in Table 1. The O&M plan must be based on the manufacturer's specifications and be developed and implemented prior to or concurrent with initial operation of the equipment, but no later than sixty (60) days after issuance of this Order. It must include at minimum:
 - a. Startup, normal operation, shutdown procedures and operational parameters;
 - b. Frequencies of scheduled inspections, monitoring, calibrations, routine preventive and corrective maintenance procedures, including replacement or repair of equipment or parts subject to wear and tear;
 - c. A list of spare parts and tools maintained on site;

- d. Emergency and malfunction contingency procedures, including descriptions of potential failure scenarios, immediate response actions, troubleshooting steps, incident reporting, and post-incident review;
 - e. Operator training and certification requirements specific to operation of the equipment listed in Table 1 and compliance with conditions in this Order; and
 - f. Recordkeeping procedures, including the types of records maintained at the Facility, the frequency of record generation, retention period, format (paper and/or electronic), and procedures for storage, retrieval, and availability of records to YRCAA upon request.
- 6.12 If the Permittee has already developed a facility-wide O&M plan including equipment previously permitted at the Facility, the plan must be updated to include the addition of the equipment listed in Table 1.
- 6.13 Any exhaust stack associated with equipment listed in Table 1 shall discharge vertically and unobstructed to the atmosphere. Rain caps, downward-facing discharges, or other configurations that impede vertical exhaust flow are prohibited. Rain caps and other weatherproof exhaust configurations are allowed provided they maintain an unobstructed vertical discharge.
- 6.14 Any exhaust stack associated with equipment listed in Table 1 shall extend to a height sufficient to promote dispersion and minimize building downwash. At a minimum, each stack shall discharge at least six (6) feet above the highest roof surface of the building on which the stack is located, including any higher roof tiers or other portions of the building.

7.0 MONITORING AND TESTING REQUIREMENTS

- 7.1 The Permittee shall monitor the pressure drop gauge for the baghouse during operation of the hop pellet handling and processing system. If the pressure drop is observed to be outside the acceptable operating range at any time during operation, the Permittee shall stop the affected operation and implement corrective actions in accordance with the O&M plan.
- 7.2 The Permittee shall log pressure drop readings from the baghouse gauge no less than once per calendar week during any week in which the hop pellet handling and processing system is operated. The acceptable pressure drop range, as recommended by the manufacturer and specified in the O&M plan, shall be clearly identified on the monitoring log. If the system is not operated during a calendar week, the log shall include an entry sufficient to determine that the system was not in operation.
- 7.3 The Permittee shall inspect the cyclone and baghouse for signs of excessive wear, damage, or malfunction at manufacturer-recommended intervals. If no inspection interval is specified, inspections shall be conducted at least once per calendar month during operation.
- 7.4 The Permittee shall conduct a visible emissions determination of the baghouse at least once per calendar month during normal operation and daylight hours using 40 CFR Part 60, Appendix A,

Method 22 (Method 22). If visible emissions, excluding uncombined water vapor, are observed for more than three (3) minutes in any one-hour period, the Permittee shall investigate the cause and implement corrective actions as soon as practicable, but no later than twenty-four (24) hours after observation. If visible emissions persist following corrective action, an opacity determination shall be conducted using Method 9A by a certified reader. Following three (3) consecutive monthly determinations with no visible emissions observed, determination frequency may be reduced to once per calendar quarter. If visible emissions are subsequently observed, monthly monitoring shall resume.

- 7.5 If and when Method 9A is required to be conducted, and Method 9A evaluation indicates opacity exceeding any applicable limit in this Order, the Permittee shall stop the affected equipment and implement corrective actions in accordance with the O&M plan as soon as practicable but no later than twenty-four (24) hours after the exceedance event. The affected equipment shall not resume operation until compliance with applicable opacity limits has been restored.
- 7.6 If YRCAA requires source testing pursuant to WAC 173-400-105(4), the Permittee shall conduct testing sufficient to demonstrate compliance with applicable particulate matter emission limits and control performance requirements. Approved test methods are to be provided by YRCAA at the time testing is required.

8.0 RECORDKEEPING REQUIREMENTS

- 8.1 The Permittee shall maintain copies of the following documents on site at all times: this Order of Approval, the most current approved O&M plan, the manufacturer's operation and maintenance manuals for all permitted equipment and Safety Data Sheets (SDS) for all material processed in equipment listed in Table 1. These documents must be readily available, organized and accessible for review by YRCAA authorized staff during inspections or upon request, pursuant to RCW 70A.15.2500 and YRCAA Regulation 1.
- 8.2 The Permittee shall maintain all records required by this Order, including results of all required monitoring or testing and all required reports, as applicable, for a minimum of five (5) years from the date of generation. Records must be readily available, organized, easily auditable, and accessible for review by YRCAA authorized staff during inspections or upon request.
- 8.3 Recordkeeping forms must be designed by the Permittee and include at a minimum: the date, time, full printed name of the person performing the activity or observation and the activity result. The forms shall be designed to capture all applicable information required herein and may be electronic or hardcopy.
- 8.4 The Permittee shall maintain, at minimum, the following records on site:
 - a. Weekly pressure drop logs for the baghouse, including units of measurement, identification of the acceptable operating range, and documentation of periods when the equipment was not operated;

- b. Total natural gas consumed by the process heater (boiler), totaled in any consecutive 12-month period;
- c. Filter replacement log, including documentation demonstrating that the replacement filter media meets required performance specifications;
- d. Inspections, routine maintenance activities, and repairs to equipment listed in Table 1. These records shall include descriptions of work performed, and shall be sufficient to verify that equipment is being maintained and operated as recommended by the manufacturer;
- e. Method 22 and Method 9A determination results;
- f. Copies of notifications and reports submitted to YRCAA, including excess emission reports, deviations, malfunctions, or other permit-required events;
- g. Operator training records, including training dates and names of trained personnel;
- h. Annual O&M plan reviews and any updates made;
- i. Documentation of manufacturer's serial numbers and any assigned equipment identification numbers for units listed in Table 1 where the serial number was initially identified as "Unknown" or otherwise unavailable; and
- j. Any deviations from Order conditions and corrective actions taken.

9.0 REPORTING REQUIREMENTS

- 9.1 The Permittee shall submit to YRCAA all source test results required by this Order, as applicable, within thirty (30) calendar days of test completion.
- 9.2 The Permittee shall notify YRCAA of any excess emissions, including opacity excess emissions, from operation of Extract Plant 3, by phone or electronic means, as follows:
 - a. As soon as possible, but not later than 12 hours after discovery, for excess emissions that represent a potential threat to human health or safety;
 - b. As soon as possible, but not later than 72 hours after discovery, for excess emissions for which the Permittee intends to demonstrate that the event was unavoidable pursuant to WAC 173-400-109; and
 - c. For all other excess emissions, no later than thirty (30) calendar days after the end of the month during which the event occurred.
- 9.3 The Permittee shall submit a written report to YRCAA for all excess emissions, consistent with WAC 173-400-108(3), no later than thirty (30) calendar days after the end of the month during which the event occurred.

- 9.4 If the Permittee intends to demonstrate that the excess emissions event was unavoidable under WAC 173-400-109, the report shall also include the information required under WAC 173-400-108(4).
- 9.5 The Permittee shall report any deviation from the conditions of this Order, other than excess emissions, to YRCAA in writing as soon as possible, but no later than thirty (30) calendar days after deviation discovery.
- 9.6 The Permittee shall submit its annual registration report to YRCAA on or before the date specified in the annual registration form. This report shall detail the operational information for the previous calendar year for equipment listed in Table 1, including total natural gas consumption, total hours of operation, estimated air emissions, and any other information required by the annual registration form. All required registration fees shall be paid in full at the time of this submittal.

10.0 GENERAL REQUIREMENTS

- 10.1 Operation of the equipment and activities identified in Table 1 shall be conducted consistent with the NoC application, and all plans, data, specifications, and other information provided in reference thereto as submitted to the Agency except as otherwise specified herein.
- 10.2 Operation of equipment listed in Table 1 shall comply with all applicable federal, state, and local air pollution laws and regulations including, but not limited to, the Federal Clean Air Act (42 USC Chapter 85), Washington Clean Air Act (Chapter 70A.15 RCW), General Regulations for Air Pollution Sources (Chapter 173-400 WAC), Controls for New Sources of Toxic Air Pollutants (Chapter 173-460 WAC), and Yakima Regional Clean Air Agency Regulation 1, all as may be amended.
- 10.3 This Order does not grant permission to operate the Facility in the absence of any other permit required by law.
- 10.4 All air emissions generating equipment and activities, air emissions control equipment and measures, and monitoring equipment required, authorized, or described herein this Order shall be operated and maintained in accordance with manufacturer specifications, the O&M plan, and conditions of this Order, in a manner consistent with safety and good air pollution control practices, for minimizing the release of Air Contaminants from the Facility to the greatest extent reasonable possible. Determination of whether such operation and maintenance procedures are being used will be based on information available to YRCAA which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
- 10.5 The Permittee shall ensure personnel responsible for operating equipment listed in Table 1 are trained in proper operating procedures, required monitoring activities, and applicable requirements of this Order.

- 10.6 In addition to the periodic source testing required under this Order, if any, YRCAA may require additional source test for any equipment listed in Table 1, pursuant to WAC 173-400-105(4), to demonstrate compliance with applicable limits. YRCAA will notify the Permittee of the requirement and applicable test method in writing.
- 10.7 All plans, specifications, and other information submitted to, and any further authorizations, approvals, or denials issued by, the Agency in relation to this Facility shall be incorporated herein by reference and made a part hereof as is fully set forth in this Order.
- 10.8 Prior to any new or additional construction, modification, alteration, expansion, equipment installation, operating revision, or change in the limits set forth in this Order affecting the air emissions of the Facility, except as may be included in the Notice of Construction and covered by this Order, the Permittee shall submit a NoC application wherein all BACT and t-BACT requirements are satisfied pursuant to RCW 70A.15.2210, WAC 173-400-110 and WAC 173-460-040.
- 10.9 The Permittee shall submit notification to YRCAA in writing indicating that the O&M plan has been completed and is in place, no later than sixty (60) days after issuance of this Order.
- 10.10 The O&M plan shall be reviewed by the Facility at least annually and updated as needed to reflect any modification to the operating procedures, equipment or monitoring methods. The Permittee shall record the date of each annual O&M plan review and any updates made.
- 10.11 For any equipment listed in Table 1 where the manufacturer's serial number is listed as "N/A" or is otherwise unavailable, the Permittee shall provide in writing the manufacturer's serial number to YRCAA prior to initial operation of the equipment or within sixty (60) days of issuance of this Order, whichever occurs later. If a manufacturer's serial number is not present on the equipment, the Permittee shall permanently affix a unique, company-assigned identification number to the unit and ensure the identifier is used consistently in all records and documentation associated with this Order, and the Permittee shall maintain documentation of all serial numbers and assigned identifiers on-site.
- 10.12 Any application form, report, or compliance certification submitted to YRCAA pursuant to this Order must be signed by the responsible official.
- 10.13 All air emissions from this Facility shall be in compliance with air emission standards at all times. It is the responsibility of the owner to make sure that air emissions are within all known rules and regulations.
- 10.14 The Permittee shall prevent Air Contaminants and other fugitive emissions from migrating outside the Exterior Property Boundary of the Facility in sufficient quantity and/or duration as to be detrimental to the health, safety, or welfare of any person, cause injury to property, animals, or plants, or unreasonably interfere with the use and enjoyment of the property so affected.
- 10.15 The Permittee shall comply with all other standards for maximum air emissions including, but not limited to, those specified in WAC 173-400-040, 173-400-050, 173-400-060, 173-400-070, and 173-400-075.

- 10.16 The Permittee shall allow Agency staff to enter the Facility, at reasonable times, without notice, for the purpose of investigating conditions specific to the control, recovery, or release of air contaminants into the atmosphere and shall not obstruct, hamper, or interfere with any such inspection in accordance with RCW 70A.15.2500 and YRCAA Regulation 1 Section 2.01.
- 10.17 Nothing in this Order shall prevent or relieve compliance with the requirements of any applicable law or regulation including those set forth in the FCAA and WCAA.
- 10.18 Any violation(s) of the requirements in this Order are subject to enforcement and penalty action in accordance with RCW 70A.15.3150 and 3160, WAC 173-400-230 and YRCAA Regulation 1, Article 5.
- 10.19 This Order may be modified, suspended, or revoked in whole, or in part, for cause including, but not limited to, the following:
- a. Violating any of the conditions or requirements of this Order;
 - b. Providing any data, log, result, or other information, or making any statement, certification, or other representation, to the Agency pertaining to the project or Facility that is materially false; or
 - c. Altering any monitoring method, tampering with any monitoring equipment or sample, or interfering with any person responsible for monitoring, collecting, or analyzing emissions from the Facility so as to render the results of such monitoring, collection, or analysis inaccurate, incomplete, or unusable.
- 10.20 The provisions of this authorization are severable and, if any provision or application of any provision 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.
- 10.21 Deviations from conditions in this Order may constitute violations subject to enforcement pursuant to RCW 70A.15.3150 and 3160, WAC 173-400-230, and YRCAA Regulation 1, Article 5.
- 10.22 All excess emissions from this Facility are considered violations of applicable emission standards and conditions in this Order.
- 10.23 The requirements of this Order apply to the Facility owner and/or operator(s) and any contractor or subcontractor performing any activity authorized under this Order. Any person(s), including contractor(s) and/or subcontractor(s), not in compliance with the applicable requirements in this Order are in violation of state and local laws and subject to appropriate civil and criminal penalties. The Facility owner and/or operator, and all contractor(s) or subcontractor(s) are liable for the actions and violations of their employee(s). Any violation committed by a contractor or subcontractor shall be considered a violation by the Facility owner and/or operator and a violation by the contractor and/or any subcontractor(s).

- 10.24 It is the Permittee's responsibility to stay current, and comply, with all applicable laws, rules and regulations governing their business.
- 10.25 This Order and the requirements contained therein shall remain in effect in the event of any change in the control or ownership of the Facility. The Permittee shall provide a full and complete copy of this Order to any succeeding owner or controlling party of the Facility and submit a "Change of Ownership" (or subsequently adopted) form obtained from the Agency to the same within thirty (30) calendar days of any such change.
- 10.26 If the Facility permanently ceases operations, the Permittee shall submit a "Closure Notification" (or subsequently adopted) form obtained from the Agency to the same within ninety (90) calendar days of the Facility ceasing operations.
- 10.27 This Order is invalid without paying the complete appropriate and required fees to YRCAA, pursuant to RCW 70A.15.2210.

11.0 APPEALS

Any person with standing may appeal this Order to the PCHB. The appeal process and applicable requirements are governed by Chapter 43.21B RCW {app.leg.wa.gov/rcw/default.aspx?cite=43.21B} and Chapter 371-08 WAC {app.leg.wa.gov/wac/default.aspx?cite=371-08}.

11.1 Requirements

Any person appealing this Order must file a notice of appeal with the PCHB and serve the Agency with a paper copy of the appeal via delivery in person, postal mail, or common carrier within thirty (30) days of the date of receipt as set forth in RCW 43.21B.001(2) {app.leg.wa.gov/rcw/default.aspx?cite=43.21B.001}.

11.2 Instructions

Instructions regarding filing an appeal are available on the PCHB web site at eluh.wa.gov/boards/pollution-control-hearings-board/file-appeal (URL); by mail at PO Box 40903; Olympia, WA 98504-0903; or by calling 360-664-9160 (relay service for the hearing impaired is available by calling 711).

11.3 Additional Information

Additional information is available at the following URLs:

- a. PCHB: eluh.wa.gov/boards/pollution-control-hearings-board.
- b. PCHB Resources and Glossary: eluh.wa.gov/boards/pollution-control-hearings-board/resources-and-glossary.
- c. Administrative Procedures Act (Chapter 34.05 RCW): app.leg.wa.gov/rcw/default.aspx?cite=34.05

DATED this 2nd day of September 2026.

PREPARED BY:



Dutsanee Luther
Air Quality Engineer
Yakima Regional Clean Air Agency

REVIEWED BY:



Elizel Reynoso
Permitting and Planning Division Supervisor
Yakima Regional Clean Air Agency

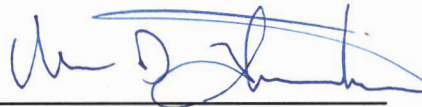
REVIEWED BY:





Julie Werner, P.E., LEED AP
Scout Environmental, Inc.

ISSUED BY:



Marc Thornsbury
Air Pollution Control Officer
Yakima Regional Clean Air Agency



Figure 1: Google Earth view of Yakima Chief Hops Inc., Extract Plant 3, and the property line.

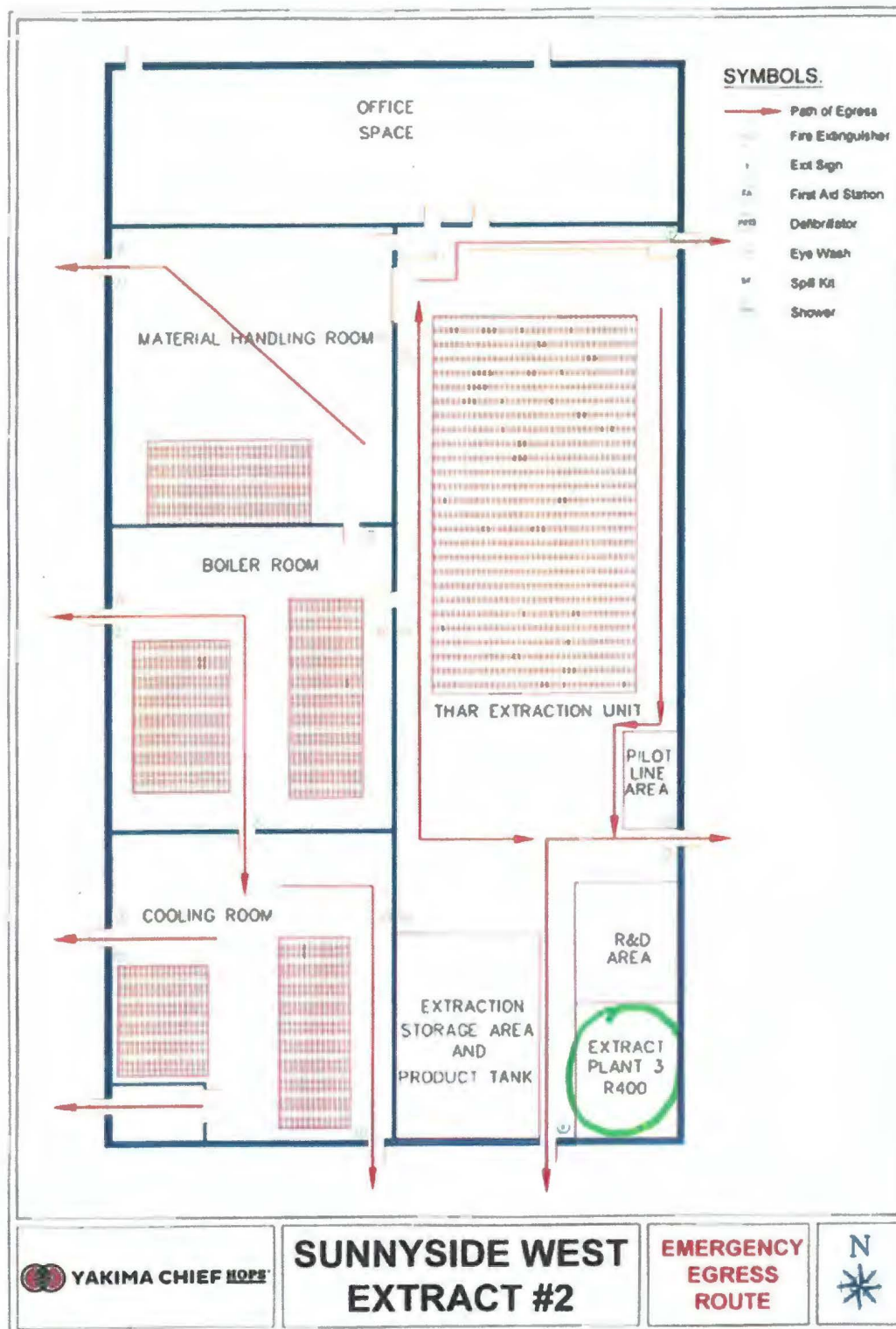
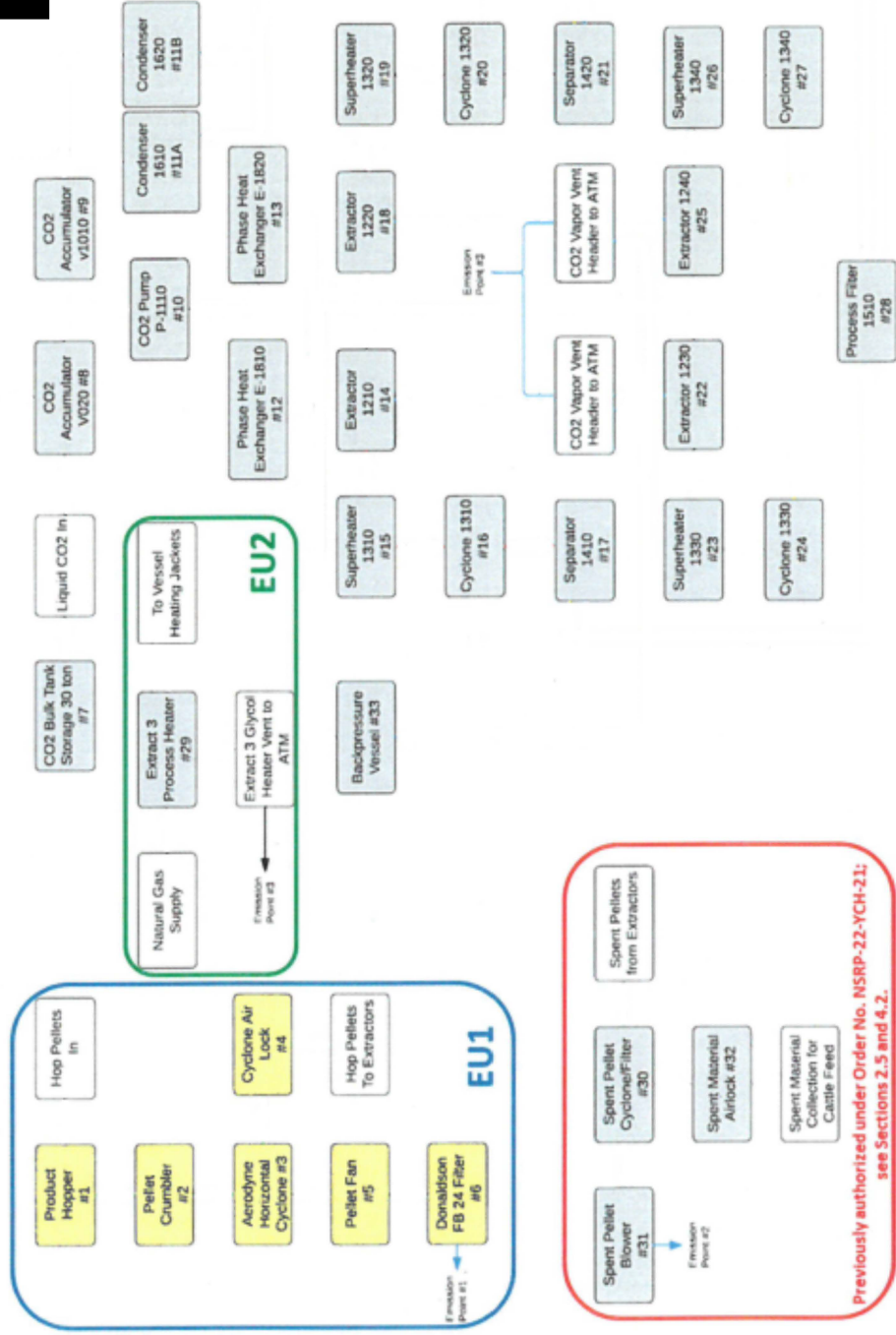


Figure 2: Facility site plan with Extraction Plant 3 outlined in green.



CONFIDENTIAL



Equipment #14, #18, #22 and #25 goes to Equipment #30.
These equipment devices are not air handling cyclones: Cyclone 1310, Separator 1410, Cyclone 1320, Separator 1420, Cyclone 1330, and Cyclone 1340.

Figure 3: Process flow diagram of Extraction Plant 3 showing equipment authorized under this Order (EU1 outlined in blue and EU2 outlined in green), equipment previously authorized under Order NSRP-22-YCH-21 (outlined in red), and ancillary equipment not identified as an emission unit under this Order.

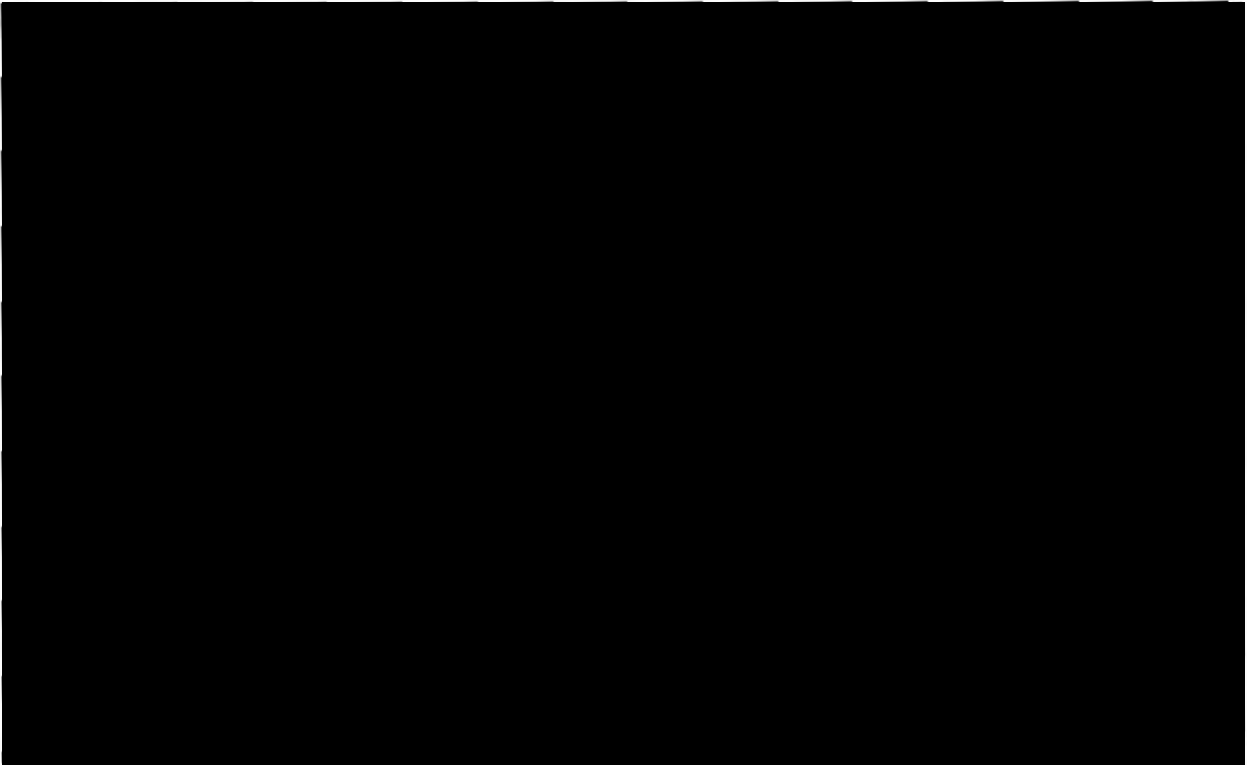


Figure 3.1-1: Front view of the [REDACTED] extraction system, [REDACTED] configuration

Item Number	Description	Section
1	Accumulator component skid	4.2
2	Extractor component skid	4.3
3	HMI control panel	4.4
4	Hydraulic power unit	4.5

Figure 4: Extraction vessels equipment for extraction process.

Aerodyne®

GPC Dust Collector

The compact, high efficiency cyclone



15000 CFM unit pictured above

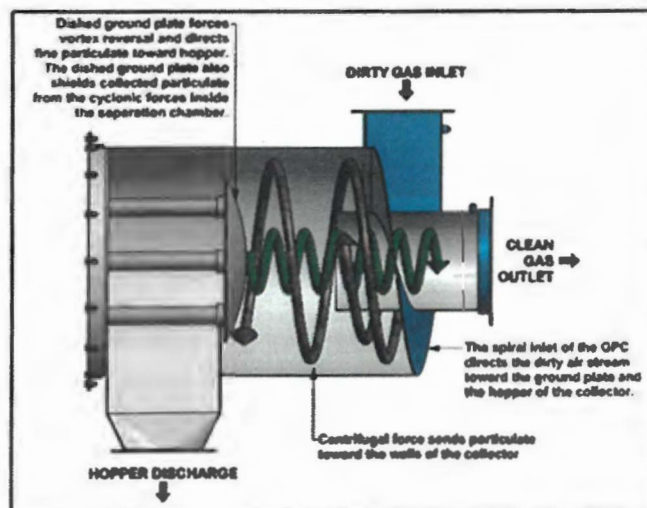
GPC Cyclone

The GPC is a compact dust collection cyclone that uses centrifugal motion to separate particulate from the airflow. Unlike traditional cyclones, the GPC uses a Ground Plate to deflect dust toward the walls, while at the same time reversing the direction of the airflow.

- Ideal for applications with limited space
- Extend bag and cartridge filter life
- 6 sizes under 8 ft³ per NFPA 654
- Great for product reclamation and ingredient recycling

Advantages

1. The Ground Plate allows the GPC to collect dust with a horizontal design. Since the Ground Plate deflects the particulate to the walls and away from the center, the GPC can be designed for horizontal operation.
2. The GPC design is compact compared to traditional cyclones. A vertical GPC is about one-half the height of a traditional cyclone, while a horizontal GPC is about one-third the height of a traditional cyclone.
3. The GPC provides high particulate removal efficiency. It will provide 99% removal of 20 micron dust (spherical shape, specific gravity of 1.0).
4. The Ground Plate isolates the hopper, preventing product re-entrainment and minimizing wear that is common near the bottom of standard cyclones.



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Figure 5: Aerodyne Horizontal cyclone GPC-15 (Unit #3) specifications.

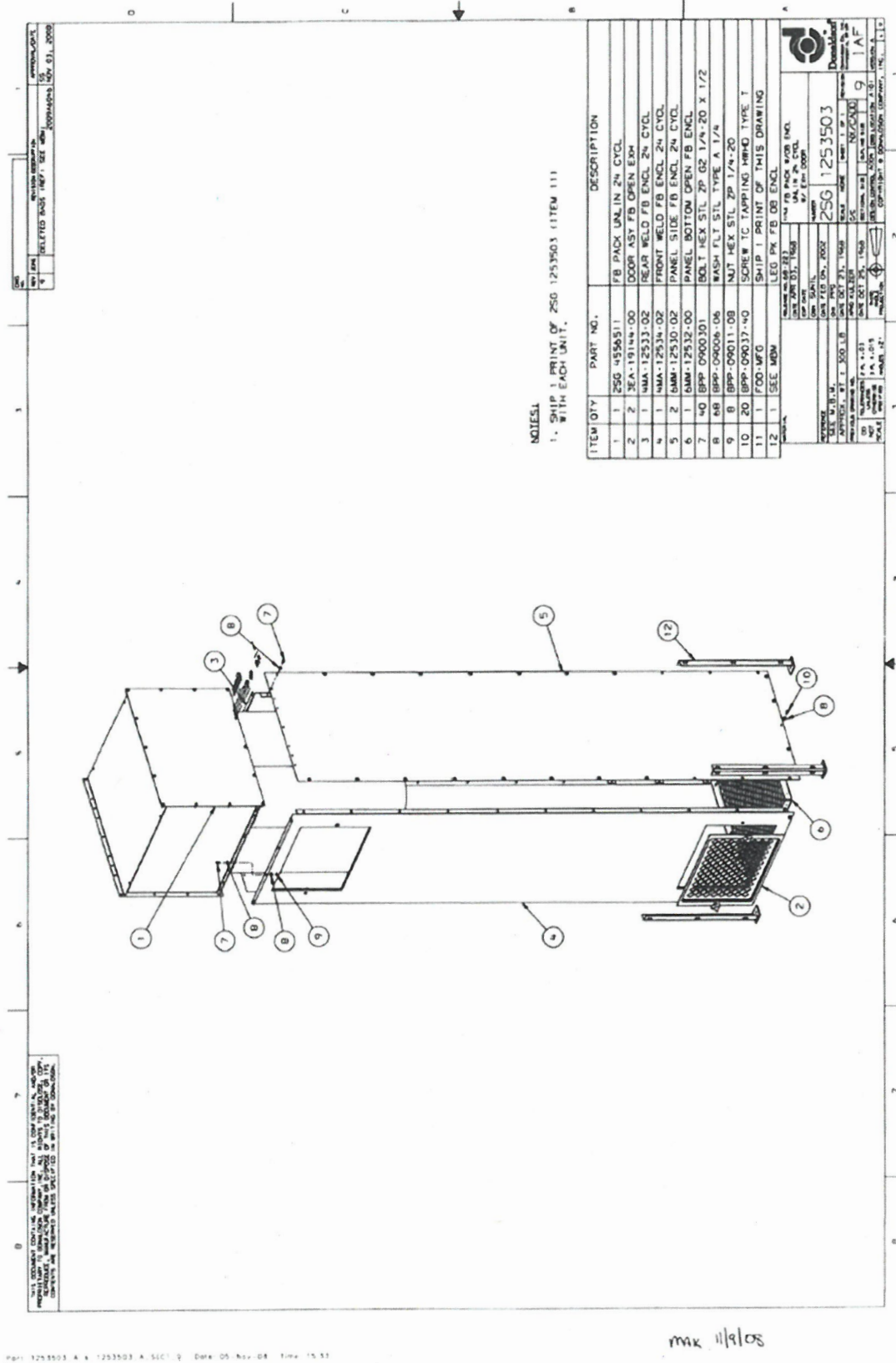


Figure 6: Donaldson Torit FB-24 baghouse (Unit #6) drawing.

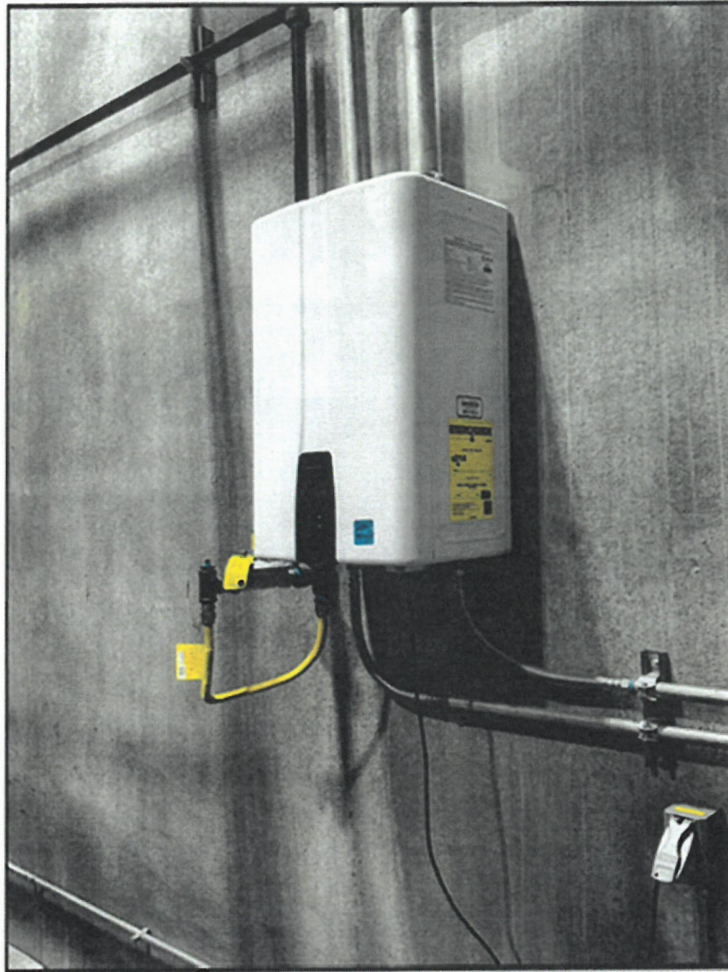


Figure 7-1: Natural gas-fired process heater (boiler) used in Extract Plant 3 (Unit #29).

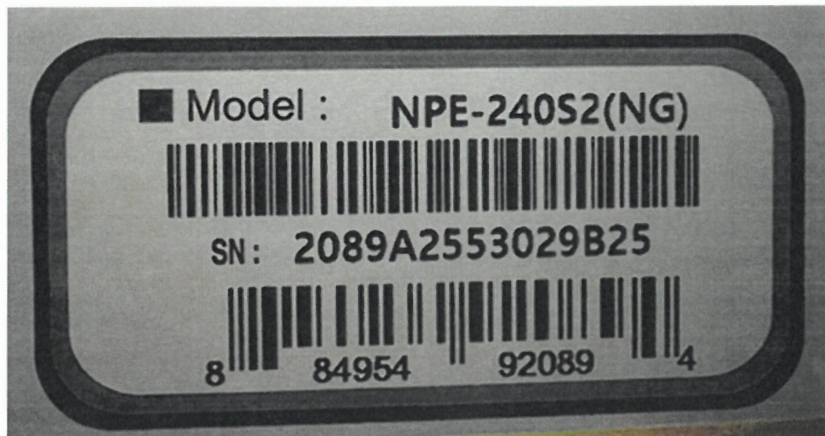


Figure 7-2: Model and serial number of natural gas-fired process heater (boiler) used in Extract Plant 3 (Unit #29).



Figure 8: Filter receiver VAC-U-MAX for spent pellet cyclone (Unit #30) and spent pellet blower (Unit #31) relocated from Extract Plant 2 to Extract Plant 3.

Appendix A

AIR EMISSIONS ASSOCIATED WITH NSRP-12-YCHI-25

Hop pellet handling and processing system (EU1) ¹

¹ EU1 consists of Product Hopper #1, Pellet Crumbler #2, Horizontal Cyclone (Aerodyne GPC-15) #3, Cyclone Air Lock #4, Pellet Fan #5, and Baghouse (Donaldson FB24) Filter #6, as shown in Figure 3 of Order NSRP-12-YCHI-25. Particulate emissions are generated during pellet handling and processing operations and are controlled by the cyclone and baghouse prior to discharge to the atmosphere.

Table A: Operating hours		
Actual Operating Hours ¹	8064 hours/yr	(24/7 for 48 weeks)
Potential (PTE) Operating Hours [Allowable]	8760 hours/yr	(24/7 for 52 weeks)

¹ Obtained by the Permittee as part of the notice of construction (NoC) application.

Table B: Baghouse specifications ¹	
Manufacturer	Donaldson Torit
Model	FB-24
Airflow Rate	729 cfm
Emission Rate of Dura-Life Filter	0.004 grain/dscf ⁽²⁾
Emission Rate of Dura-Life Filter	5.71E-07 lb/dscf ⁽³⁾

¹ The baghouse serves as the final particulate control device and emission point for EU1. For conservative purposes, EU1 emissions were calculated based on the baghouse outlet concentration only.

² From manufacturer's efficiency statement. Emission level for total particulate emissions (PM).

³ Conversion from grains to pounds: 1 lb = 7,000 grains.

Table 1: Emission from hop pellet handling and processing system (EU1)

Pollutant	Actual Emission		PTE/Allowable Emissions	
	lb/year	ton/year	lb/year	ton/year
PM/PM ₁₀ /PM _{2.5} ¹	201.55	0.10	218.95	0.11

¹ For conservative purposes, all PM emissions considered to be equal to PM₁₀ and PM_{2.5}.

Appendix A

AIR EMISSIONS ASSOCIATED WITH NSRP-12-YCH1-25

Process heater (boiler) (EU2)

Table A: Boiler manufacturer specification ¹		
Manufacturer	Navien	
Boiler Model	NPE-24032(NG)	
Fuel	Natural gas	
Fuel heating value ²	1050 Btu/scf	
Total Maximum firing rate	0.1399 MMBtu/hr	

¹ Obtained by the Permittee as part of the notice of construction (NOC) application, unless otherwise noted.

² Obtained from AP-42 Appendix A - Miscellaneous Data and Conversion Factors

Table B: Actual Operating hours ¹		
24 hours/day	336 days/year	
365 days/year	8064 hours/year	

¹ Obtained by the Permittee as part of the notice of construction (NOC) application. (24/7 for 48 weeks)

Table C: PTE/Allowable Operating hours ¹		
24 hours/day	365 days/year	
365 days/year	8760 hours/year	

¹ Operating hours used to calculate air emissions are conservatively assumed as continuous full-year operation (8,760 hours per year) to represent Potential to Emit (PTE).

Table 1: Emissions from natural gas combustion

Pollutant	CAS No. ¹	Classification ²	Emission Factor (lb/MMBtu) ³	Emissions (lb/hour)		Actual Emission Rate			Averaging period (ave period) ⁴	De Minimis (lb/ave period) ⁴	SQER (lb/ave period) ⁴	ASIL (ug/m3) ⁴	Permitting Required? > De Minimis?	Modeling Required? > SQER?
				(lb/hour)	(lb/day)	(lb/day)	(lb/year)	(ton/year)						
NOx	10102-44-0	CAP/TAP	100	1.90E-02	4.57E-01	1.54E+02	7.68E-02	6.45E-02	1-hr	4.6E-01	8.7E-01	4.7E-02	No	No
CO	630-08-0	CAP/TAP	84	1.60E-02	3.84E-01	1.29E+02	6.45E-02	5.45E-02	1-hr	1.1E+00	4.3E+01	2.3E-04	No	No
Lead	7439-92-1	CAP/HAB/TAP	0.0005	9.52E-08	2.28E-06	7.68E-04	3.84E-07	3.84E-07	year	1.0E+01	1.4E+01	8.3E-02	No	No
PM ₁₀ /PM _{2.5}	-	CAP	7.6	1.45E-03	3.47E-02	1.17E+01	5.83E-03	3.47E-02	year	-	-	-	-	-
SO ₂	7446-09-5	CAP/TAP	0.6	1.14E-04	2.74E-03	9.21E-01	4.61E-04	2.74E-03	1-hr	4.6E-01	1.2E+00	6.6E-02	No	No
VOC	-	CAP (precursor)	5.5	1.05E-03	2.51E-02	8.44E+00	4.22E-03	5.01E-02	-	-	-	-	-	-
TOC	-	-	11	2.09E-03	5.03E-02	1.69E+01	8.44E-03	5.03E-02	-	-	-	-	-	-
CO ₂	124-38-9	-	120000	2.28E+01	5.48E+02	1.84E+05	9.21E+01	5.48E+02	-	-	-	-	-	-
N ₂ O	10074-97-2	-	0.64	1.22E-04	2.92E-03	9.83E-01	4.91E-04	2.92E-03	-	-	-	-	-	-
Methane	74-82-8	-	2.3	4.38E-04	1.05E-02	3.53E+00	1.77E-03	1.05E-02	-	-	-	-	-	-
2-Methylnaphthalene	91-57-6	-	2.4E-05	4.57E-09	1.10E-07	3.68E-05	1.84E-08	1.10E-07	year	7.8E-04	1.6E-02	9.6E-05	No	No
3-Methylnaphthalene	56-49-5	TAP	1.8E-06	3.43E-10	8.22E-09	2.76E-06	1.38E-09	8.22E-09	year	6.9E-05	1.4E-03	8.5E-06	No	No
7,12-Dimethylbenz[a]anthracene	57-97-6	TAP	1.6E-05	3.05E-09	7.31E-08	2.46E-05	1.23E-08	7.31E-08	year	-	-	-	-	-
Acenaphthene	83-32-9	-	1.8E-06	3.43E-10	8.22E-09	2.76E-06	1.38E-09	8.22E-09	-	-	-	-	-	-
Acenaphthylene	208-96-8	-	1.8E-06	3.43E-10	8.22E-09	2.76E-06	1.38E-09	8.22E-09	-	-	-	-	-	-
Anthracene	120-12-7	-	2.4E-06	4.57E-10	1.10E-08	3.68E-06	1.84E-09	1.10E-08	-	-	-	-	-	-
Benz[a]anthracene	56-55-3	TAP	1.8E-06	3.43E-10	8.22E-09	2.76E-06	1.38E-09	8.22E-09	year	4.5E-02	8.9E-01	5.5E-03	No	No
Benz[e]anthracene	71-43-2	HAB/TAP	2.1E-03	4.00E-07	9.60E-06	3.22E-03	1.61E-06	9.60E-06	year	1.0E+00	2.1E+01	1.3E-01	No	No
Benzofluoranthene	50-32-8	TAP	1.7E-06	2.28E-10	5.48E-09	1.84E-06	9.21E-10	5.48E-09	year	8.2E-03	1.6E-01	1.0E-03	No	No
Benzofluoranthene	205-99-2	TAP	1.8E-06	3.43E-10	8.22E-09	2.76E-06	1.38E-09	8.22E-09	year	4.5E-02	8.9E-01	5.5E-03	No	No
Benzofluoranthene	191-24-2	-	1.2E-06	2.28E-10	5.48E-09	1.84E-06	9.21E-10	5.48E-09	-	-	-	-	-	-
Benzofluoranthene	207-08-9	TAP	1.8E-06	3.43E-10	8.22E-09	2.76E-06	1.38E-09	8.22E-09	year	4.5E-02	8.9E-01	5.5E-03	No	No
Butane	106-97-8	-	2.1E+00	4.00E-04	9.60E-03	3.22E+00	1.61E-03	9.60E-03	year	4.5E-01	8.9E+00	5.5E-02	No	No
Chrysene	218-01-9	TAP	1.8E-06	3.43E-10	8.22E-09	2.76E-06	1.38E-09	8.22E-09	year	4.5E-01	8.9E+00	5.5E-02	No	No
Dibenz[a,h]anthracene	53-70-3	TAP	1.2E-06	2.28E-10	5.48E-09	1.84E-06	9.21E-10	5.48E-09	year	4.1E-03	8.2E-02	5.0E-04	No	No
Dichlorobenzene	25321-22-6	TAP	1.2E-03	2.28E-07	5.48E-06	1.84E-03	9.21E-07	5.48E-06	year	7.4E-01	1.5E+01	9.1E-02	No	No
Ethane	74-84-0	-	3.1E+00	5.90E-04	1.42E-02	4.76E+00	2.38E-03	1.42E-02	-	-	-	-	-	-
Fluoranthene	206-44-0	-	3.0E-06	5.71E-10	1.37E-08	4.61E-06	2.30E-09	1.37E-08	-	-	-	-	-	-
Fluorene	86-73-7	-	2.8E-06	5.33E-10	1.28E-08	4.30E-06	2.15E-09	1.28E-08	-	-	-	-	-	-
Formaldehyde	50-00-0	HAB/TAP	7.5E-02	1.43E-05	3.43E-04	1.15E-01	5.76E-05	3.43E-04	year	1.4E+00	2.7E+01	1.7E-01	No	No
Hexane	110-54-3	HAB/TAP	1.8E+00	3.43E-04	8.22E-03	2.76E+00	1.38E-03	8.22E-03	24-hr	2.6E+00	5.2E+01	7.0E-02	No	No
Indeno[1,2,3-cd]pyrene	193-39-5	TAP	1.8E-06	3.43E-10	8.22E-09	2.76E-06	1.38E-09	8.22E-09	year	4.5E-02	8.9E-01	5.5E-03	No	No
Naphthalene	91-20-3	HAB/TAP	5.1E-04	1.16E-07	2.79E-06	9.36E-04	4.68E-07	2.79E-06	year	2.4E-01	4.8E+00	2.9E-02	No	No
Pentane	109-66-0	-	2.6E+00	4.95E-04	1.19E-02	3.99E+00	2.00E-03	1.19E-02	-	-	-	-	-	-
Phenanthrene	85-01-8	-	1.6E-05	3.24E-09	7.77E-08	2.61E-05	1.30E-08	7.77E-08	-	-	-	-	-	-
Propane	74-98-6	-	1.6E+00	3.05E-04	7.31E-03	2.46E+00	1.23E-03	7.31E-03	-	-	-	-	-	-
Pyrene	129-00-0	-	5.0E-06	9.52E-10	2.28E-08	7.68E-06	3.84E-09	2.28E-08	-	-	-	-	-	-
Toluene	108-88-3	HAB/TAP	3.4E-03	6.47E-07	1.55E-05	5.22E-03	2.61E-06	1.55E-05	24-hr	1.9E+01	3.7E+02	5.0E-03	No	No

Table 1: Emissions from natural gas combustion (cont.)

Pollutant	CAS No. 1	Classification 2	Emission Factor (lb/MMBtu) 3	Emissions (lb/year)			Actual Emission Rate (ton/year)			PTE/Allowable Emission Rate (lb/day)			Averaging period (ave period) 4	De Minimis (lb/ave period) 4	SQER (lb/ave period) 4	ASIL (µg/m3) 4	Permitting Required?	Modeling Required?
				(lb/day)	(lb/year)	(ton/year)	(lb/day)	(lb/year)	(ton/year)	(lb/day)	(lb/year)	(ton/year)						
Arsenic	7440-38-2	HAP/TAP	2.0E-04	9.14E-07	3.07E-04	1.54E-07	9.14E-07	3.07E-04	1.54E-07	9.14E-07	3.07E-04	1.54E-07	year	2.5E-03	4.9E-02	3.0E-04	No	No
Barium	7440-39-3	-	4.4E-03	2.01E-05	6.76E-03	3.38E-06	2.01E-05	6.76E-03	3.38E-06	2.01E-05	6.76E-03	3.38E-06	year	-	-	-	-	-
Beryllium	7440-41-7	HAP/TAP	1.2E-05	5.48E-08	1.84E-05	9.21E-09	5.48E-08	1.84E-05	9.21E-09	5.48E-08	1.84E-05	9.21E-09	year	3.4E-03	6.8E-02	4.2E-04	No	No
Cadmium	7440-43-9	HAP/TAP	1.1E-03	2.09E-07	1.69E-03	8.44E-07	5.03E-06	1.69E-03	8.44E-07	5.03E-06	1.69E-03	8.44E-07	year	1.9E-03	3.9E-02	2.4E-04	No	No
Chromium(III)	7440-47-3	HAP/TAP	1.3E-03	2.56E-07	2.06E-03	1.03E-06	6.14E-06	2.06E-03	1.03E-06	6.14E-06	2.06E-03	1.03E-06	year	3.7E-04	7.4E-03	1.0E-01	No	No
Chromium(VI)	18540-29-9	HAP/TAP	5.6E-05	1.07E-08	8.60E-05	4.30E-08	2.56E-07	8.60E-05	4.30E-08	2.56E-07	8.60E-05	4.30E-08	year	3.3E-05	6.5E-04	4.0E-06	Yes	No
Cobalt	7440-48-4	HAP/TAP	8.4E-05	1.60E-08	1.29E-04	6.45E-08	3.84E-07	1.29E-04	6.45E-08	3.84E-07	1.29E-04	6.45E-08	24-hr	3.7E-04	7.4E-03	1.0E-01	No	No
Copper	7440-50-8	TAP	8.5E-04	1.63E-07	1.30E-03	6.53E-07	3.88E-06	1.30E-03	6.53E-07	3.88E-06	1.30E-03	6.53E-07	1-hr	9.3E-03	1.9E-01	1.0E-02	No	No
Manganese	7439-96-5	HAP/TAP	3.8E-04	7.23E-08	5.83E-04	2.92E-07	1.74E-06	5.83E-04	2.92E-07	1.74E-06	5.83E-04	2.92E-07	24-hr	1.1E-03	2.2E-02	3.0E-01	No	No
Mercury	7439-97-6	HAP/TAP	2.6E-04	4.95E-08	3.99E-04	2.00E-07	1.19E-06	3.99E-04	2.00E-07	1.19E-06	3.99E-04	2.00E-07	24-hr	1.1E-04	2.2E-03	3.0E-02	No	No
Molybdenum	7439-98-7	-	1.1E-03	2.09E-07	1.69E-03	8.44E-07	5.03E-06	1.69E-03	8.44E-07	5.03E-06	1.69E-03	8.44E-07	year	-	-	-	-	-
Nickel	7440-02-0	HAP/TAP	2.1E-03	4.00E-07	3.22E-03	1.61E-06	9.60E-06	3.22E-03	1.61E-06	9.60E-06	3.22E-03	1.61E-06	year	3.1E-02	6.2E-01	3.8E-03	No	No
Selenium	7782-49-2	HAP/TAP	2.4E-05	4.57E-09	3.68E-05	1.84E-08	1.10E-07	3.68E-05	1.84E-08	1.10E-07	3.68E-05	1.84E-08	24-hr	7.4E-02	1.5E+00	2.0E-01	No	No
Vanadium	7440-62-2	TAP	2.3E-03	4.38E-07	3.53E-03	1.77E-06	1.05E-05	3.53E-03	1.77E-06	1.05E-05	3.53E-03	1.77E-06	24-hr	3.7E-04	7.4E-03	1.0E-01	No	No
Zinc	7440-66-6	-	2.9E-02	5.52E-06	4.45E-02	2.23E-05	1.33E-04	4.45E-02	2.23E-05	1.33E-04	4.45E-02	2.23E-05	year	-	-	-	-	-

1 Chemical abstract service (CAS) number.

2 Criteria air pollutant (CAP), hazardous air pollutant (HAP), toxic air pollutant (TAP).

3 Obtained from AP 42, Fifth Edition, Volume I Chapter 1: External Combustion Sources, Section 1.4: Natural Gas Combustion, Tables 1.4-1, 2, 3 and 4.

4 Obtained from WAC 173-460-150. Effective 12/23/19.

5 Expressed as NO_x, which is a CAP and TAP. Emission factor obtained from Table 1.4-1 for small natural gas boiler (<100MMBtu/hr) - Uncontrolled.

6 Conservatively assumed PM₁₀=PM_{2.5}.

7 Dichlorobenzene with CAS No. 25321-22-6 represents a mixture of dichlorobenzene isomers, including 1,4-Dichlorobenzene with CAS No. 106-46-7 which is a TAP.

8 Emission factor listed in AP-42 includes Cr(III) and Cr(VI). EF was multiplied by 96% to obtain EF for Cr(III) and 4% to obtain an EF for Cr(VI). Chromium Speciation obtained from "An Overview of Methods for EPA's National Scale Air Toxics Assessment", January 31, 2011, OAQPS", Appendix D, page D-4, for SCC 10200603. See <https://www.epa.gov/sites/production/files/2015-10/documents/2005-nta-tmd.pdf>.

Appendix B

CONFIDENTIAL

EQUIPMENT ASSOCIATED WITH EXTRACT PLANT 3

Unit No. ¹	Unit Type	Manufacturer, Model No., Serial No.
1	Product Hopper	YCH, NA, N/A
2	Pellet Crumbler	[REDACTED]
3	Extractor Cyclone	Aerodyne, GPC-15 , 5540-01-01
4	Cyclone Airlock	Ancaster, MD 6, SAF57 DRN80MK4/AL
5	Pellet Fan	New York Blower, 2006B10, 2026-02338-01
6	Pellet Blower Baghouse	Donaldson, FB-24, N/A
7	CO2 Bulk Storage Tank	Tomco, NB-6139, 98502
8	CO2 Accumulator V1020	[REDACTED]
9	CO2 Accumulator V1010	[REDACTED]
10	CO2 Pump P-1110	[REDACTED]
11	Extract 3 Refrigeration Condenser	Russell, VLD30L44-G, E19A00860101001001
11A	Condenser 1610	[REDACTED]
11B	Condenser 1620	[REDACTED]
12	Phase Heat Exchanger E-1810	[REDACTED]
13	Phase Heat Exchanger E-1810	[REDACTED]
14	Extractor 1210	[REDACTED]
15	Superheater 1310	[REDACTED]
16	Cyclone 1310 (*)	[REDACTED]
17	Separator 1410 (*)	[REDACTED]
18	Extractor 1220	[REDACTED]
19	Superheater 1320	[REDACTED]
20	Cyclone 1320 (*)	[REDACTED]
21	Separator 1420 (*)	[REDACTED]
22	Extractor 1230	[REDACTED]
23	Superheater 1330	[REDACTED]
24	Cyclone 1330 (*)	[REDACTED]
25	Extractor 1240	[REDACTED]
26	Superheater 1340	[REDACTED]
27	Cyclone 1340 (*)	[REDACTED]
28	Process Filter 1510	[REDACTED]
29	Extract 3 Process Heater	Navien, NPE-240AS/S2, 2089A2553029B25
30	Spent Material Cyclone/Filter	VAC-U-MAX, Z74610/03, 100075, 100075
31	Spent Material Blower	Gardner Denver, GACMBSA, S617399
32	Spent Material Airlock	Ancaster Conveying Systems, 8" Round MD-QC, 38372
33	Backpressure Vessel 1710	[REDACTED]

¹ Unit No. corresponds to equipment number shown in Figure 3.

* This equipment is not an air handling equipment.