

July 24, 2024

Mr. Mike Leeper, Safety Manager  
Kalama Export Company, LLC  
2211 North Hendrickson Drive  
Kalama, WA 98625

Subject: Final Air Discharge Permit for Approval of New Commodities

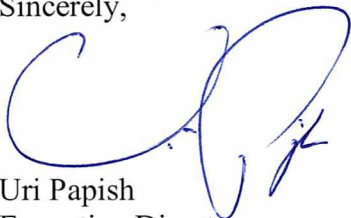
Dear Mr. Leeper:

A final determination to issue Air Discharge Permit 24-3651 (ADP 24-3651) has been completed for Air Discharge Permit (ADP) Application CO-1099 pursuant to Section 400-110(4) of the General Regulations for Air Pollution Sources of the Southwest Clean Air Agency (SWCAA). Public notice for ADP Application CO-1099 was published in the permit section of SWCAA's internet website on June 4, 2024. SWCAA did not receive a request for a public comment period in response to the public notice and has concluded that significant public interest does not exist for this determination. Therefore, a public comment period will not be provided for this permitting action. Electronic copies of ADP 24-3651 and the associated Technical Support Document are available for public review in the permit section of SWCAA's internet website (<http://www.swcleanair.gov/permits/adpfinal.asp>). Original copies are enclosed for your files.

This Air Discharge Permit may be appealed directly to the Pollution Control Hearings Board (PCHB) within 30 days of receipt as provided in RCW 43.21B.

If you have any comments, or desire additional information, please contact me or Wess Safford at (360) 574-3058, extension 126.

Sincerely,



Uri Papish  
Executive Director

UP:wls

Enclosure – Air Discharge Permit 24-3651 and Technical Support Document





**SWCAA**  
Southwest Clean Air Agency

**AIR DISCHARGE PERMIT  
24-3651**

**Issued: July 24, 2024**

Kalama Export Company  
2211 North Hendrickson Drive, Kalama, WA 98625

SWCAA ID - 1124



REVIEWED BY:

  
Clinton Lamoreaux, Chief Engineer

APPROVED BY:

  
Uri Papish, Executive Director

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**1. Equipment/Activity Identification**

<b>ID No.</b>	<b>Equipment/Activity</b>	<b>Control Measure/Equipment</b>
1	Railcar Receiving, Railcar Pit #1	Baghouse DC-1
2	Railcar Receiving, Railcar Pit #2	Baghouse DC-2
3	Railcar Receiving, Fugitive Emissions	None
4	Barge Receiving System	Marine Leg and Baghouse DC-11
5	Barge Receiving, Fugitive Emissions	None
6	Grain Transfer System	Baghouse DC-3
7	Weigh House Receiving	Baghouse DC-4
8	Weigh House Shipping	Baghouse DC-5
9	Sampling, Weighing, and Distribution System	Baghouse DC-15
10	Wheat Cleaning System #1	Baghouse DC-17
11	Wheat Cleaning System #2	Baghouse DC-20
12	Wheat Cleaning Systems #3 through #6	Baghouse DC-21
13	Wheat Cleaning Systems #7 through #10	Baghouse DC-22
14	Dust Bin #12	Bin Vent Filter DC-12
15	Dust Bin #13	Bin Vent Filter DC-13
16	Dust Bin #18	Bin Vent Filter DC-18
17	Dust Bin #19	Bin Vent Filter DC-19
18	Dust Bin #23	Bin Vent Filter DC-23
19	Dust and Screenings Loadout to Truck, Fugitive Emissions	Mineral Oil Application, Aspirated Telescoping Spout, Partial Enclosure
20	Storage and Shipping Bins (Batteries 1 and 2) Tops	Baghouse DC-6
21	Shipping Bins (Battery 1) Tops	Baghouse DC-7
22	Storage and Shipping Bins (Batteries 1 and 2) Bottoms	Baghouse DC-8
23	Storage Bins (500/600 Series) Bottoms	Baghouse DC-14
24	Storage Bins (500/600 Series) Tops	Baghouse DC-16
25	Shipping Bins (SB Series) Tops	Baghouse DC-24
26	Shipping Bins SB-11, SB-12, and SB-13 Bottoms	Baghouse DC-25
27	Shipping Bins SB-21 and SB-22 Bottoms	Baghouse DC-26
28	Shipping Bins SB-31, SB-32, and SB-33 Bottoms	Baghouse DC-27
29	Housekeeping Vacuum Cleaner System	Baghouse DC-28
30	Truck Loading, Fugitive Emissions	Mineral Oil Application
31	Ship Loading Towers #1 and #2	Loading Spout Deadbox, Mineral Oil Application, and Baghouse DC-9

32	Ship Loading Towers #3 and #4	Loading Spout Deadbox, Mineral Oil Application, and Baghouse DC-10
33	Ship Loading, Fugitive Emissions	Mineral Oil Application
34	Paved and Unpaved Roads, Fugitive Emissions	None
35	Emergency Fire Pump Engine	Ultra-Low Sulfur Fuel (<15 ppm S diesel)

## 2. Approval Conditions

The following tables detail the specific requirements of this permit. In addition to the requirements listed below, equipment at this facility may be subject to other federal, state, and local regulations. The permit requirement number is identified in the left-hand column. The text of the permit requirement is contained in the middle column. The emission unit, equipment, or activity to which the permit requirement applies is listed in the right-hand column.

ADP 24-3651 supersedes ADP 23-3605 in its entirety.

### Emission Limits

Req. No.	Emission Limits	Equipment/Activity ID No.						
1.	<p>Combined emissions from the facility must not exceed any of the following:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Pollutant</th> <th>Emission Limit</th> </tr> </thead> <tbody> <tr> <td>Particulate Matter, PM<sub>10</sub>, total</td> <td>53.18 tpy</td> </tr> <tr> <td>Particulate Matter, PM<sub>2.5</sub>, total</td> <td>8.92 tpy</td> </tr> </tbody> </table> <p>Annual emissions must be calculated from actual material throughput consistent with Section 6 of the TSD for this Permit. Compliance must be determined by summing emissions for a 12 consecutive month period rolled monthly.</p>	Pollutant	Emission Limit	Particulate Matter, PM <sub>10</sub> , total	53.18 tpy	Particulate Matter, PM <sub>2.5</sub> , total	8.92 tpy	1-35
Pollutant	Emission Limit							
Particulate Matter, PM <sub>10</sub> , total	53.18 tpy							
Particulate Matter, PM <sub>2.5</sub> , total	8.92 tpy							
2.	Exhaust PM concentration from all baghouses and bin vents, except bin vent filters DC-13, DC-18, and DC-19, shall not exceed a 1-hour average of 0.0020 gr/dscf as determined in accordance with Appendix A.	1, 2, 4, 6-14, 18, 20-29, 31-32						
3.	Exhaust PM concentration from bin vent filters DC-13, DC-18, and DC-19 must not exceed a 1-hour average of 0.005 gr/dscf as determined in accordance with Appendix A.	15-17						
4.	Visible emissions while receiving grain from railcars must not exceed zero percent (0%) opacity in any 1-hour period as determined by a certified observer in accordance with SWCAA Method 9.	3						
5.	While receiving grain from barges and prior to operating the barge augers, visible emissions must not exceed twenty percent (20%) opacity in any 1-hour period as determined by a certified observer in accordance with SWCAA Method 9.	5						
6.	While receiving grain from barges and after the barge augers have been started, visible emissions shall not exceed zero percent (0%) opacity in any 1-hour period as determined by a certified observer in accordance with SWCAA Method 9.	5						

Req. No.	Emission Limits	Equipment/ Activity ID No.												
7.	Visible emissions from all baghouse exhausts, bin vent filter exhausts, and any fugitive release points from internal grain handling not elsewhere described, must not exceed zero percent (0%) opacity in any 1-hour period as determined by a certified observer in accordance with SWCAA Method 9.	1-2, 4, 6-18, 20-29, 31-32												
8.	Visible emissions during loading of dust and screenings into trucks must not exceed five percent (5%) opacity in any 1-hour period determined as determined by a certified observer in accordance with SWCAA Method 9.	19												
9.	Visible emissions while loading grain into trucks must not exceed twenty percent (20%) opacity in any 1-hour period as determined by a certified observer in accordance with SWCAA Method 9.	30												
10.	<p>Visible emissions while loading grain into ships must not exceed any of the following in any 1-hour period, as determined by a certified observer in accordance with EPA Method 9 and SWCAA Method 9:</p> <table border="0" data-bbox="212 772 1276 919"> <thead> <tr> <th data-bbox="212 772 431 804"><u>Operating Mode</u></th> <th data-bbox="529 772 862 804"><u>With Mineral Oil Applied</u></th> <th data-bbox="899 772 1276 804"><u>Without Mineral Oil Applied</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="212 810 431 842">Topping off .....</td> <td data-bbox="618 810 781 842">20% opacity .....</td> <td data-bbox="1052 810 1214 842">20% opacity</td> </tr> <tr> <td data-bbox="212 848 431 879">Mid hold .....</td> <td data-bbox="618 848 781 879">10% opacity .....</td> <td data-bbox="1052 848 1214 879">15% opacity</td> </tr> <tr> <td data-bbox="212 886 431 917">Initial fill .....</td> <td data-bbox="618 886 781 917">20% opacity .....</td> <td data-bbox="1052 886 1214 917">20% opacity</td> </tr> </tbody> </table> <p>Initial fill begins when grain is initially loaded into the ship's hold until a sufficient pile of grain is created for the dead box to operate properly, mid-hold fill is defined as the period from initial fill until topping-off, and topping-off begins when the top of the grain pile within the hold reaches the height of the bottom of the hatch coaming.</p>	<u>Operating Mode</u>	<u>With Mineral Oil Applied</u>	<u>Without Mineral Oil Applied</u>	Topping off .....	20% opacity .....	20% opacity	Mid hold .....	10% opacity .....	15% opacity	Initial fill .....	20% opacity .....	20% opacity	33
<u>Operating Mode</u>	<u>With Mineral Oil Applied</u>	<u>Without Mineral Oil Applied</u>												
Topping off .....	20% opacity .....	20% opacity												
Mid hold .....	10% opacity .....	15% opacity												
Initial fill .....	20% opacity .....	20% opacity												
11.	If during ship loading, visible emissions exceed any opacity limit in Condition 10, the control efficiency used in calculating emissions from ship loading must be reduced to one-third (1/3) its normal value from the date of the violation until the date compliance with the opacity limit is again demonstrated.	33												
12.	<p>Visible emissions from the Emergency Generator Diesel Engine must not exceed five percent opacity for more than 3 minutes in any one-hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400) except during startup. For the purposes of this requirement, the startup period ends when the earlier of the following operating events occurs:</p> <ul style="list-style-type: none"> <li>(a) The engine has reached normal operating temperature; or</li> <li>(b) The engine has been operating for 15 minutes.</li> </ul>	35												

**Operating Limits and Requirements**

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
13.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
14.	The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facility-wide

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
15.	Emission units identified in this Permit must be maintained and operated in total and continuous conformity with the conditions identified in this Permit. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this Permit, including directing the facility to cease operations until corrective action can be completed.	1-35
16.	Each pollution control device must be operated whenever the processing equipment served by that air pollution control device is in operation. Control devices must be operated and maintained in accordance with the manufacturer's specifications. Furthermore, air pollution control devices must be operated in a manner that minimizes emissions.	1-2, 4, 6-33
17.	Only corn, soybeans, wheat, barley, milo, dried peas, canola, beet pellets, rapeseed, soybean meal, dried distillers' grain (DDGS), and DDGS pellets can be received, processed, or shipped from the facility. All of these commodities are considered "grain" for purposes of determining compliance with this Permit.	1-33
18.	Grain receipts by rail must not exceed 84,000 ton/day (any 24-hour period), all grains combined.	1-3
19.	Grain receipts by rail into any rail receiving pit can only be performed when both rail receiving pit baghouses DC-1 and DC-2 are in operation. Pit aspiration must be applied during the entire unloading process.	1-2
20.	Whenever there is a potential for fugitive emissions to be produced during times when grain is not being delivered to the rail receiving pits, good housekeeping procedures must be used to minimize fugitive emissions.	3
21.	Unless otherwise allowed under this ADP, corn, soybeans, wheat, barley, milo, dried peas, and canola must be oiled with a minimum of 3 qt/1,000 bu before being loaded onto a ship.	31-33
22.	Grain receipt by barge can only be conducted when: (a) The marine leg is enclosed from the top (including the receiving hopper) to the center line of the bottom pulley and ventilation to a control device is maintained on both sides of the leg. (b) Baghouse DC-11 is in operation; and (c) A minimum of 7,700 acfm is being applied to the marine leg.	4-5
23.	The barge unloading rate cannot exceed: (a) 900 ton/hr for any grain; and (b) 1,600 ton/day (any 24-hour period), all grains combined.	4-5
24.	Whenever the conveyors are in operation, the associated baghouse or filter must be operated and the conveyors and drop points must be completely enclosed, except for the unenclosed area of the individual intermediate gravity belt take-ups for conveyors.	1-2, 4, 6-18, 20-28, 31-32
25.	A differential pressure gauge must be installed and maintained operable to continuously monitor the pressure drop across each baghouse and powered bin vent filter. Each differential pressure gage or pressure display must be located in an easily accessible location to facilitate operational monitoring.	1-2, 4, 6-18, 20-29, 31-32

<b>Req. No.</b>	<b>Operating Limits and Requirements</b>	<b>Equipment/ Activity ID No.</b>
26.	A sufficient number of replacement bags and cartridges for the baghouses and bin vent filters shall be maintained and available on-site to make bag replacement as prompt as possible.	1-2, 4, 6-18, 20-29, 31-32
27.	Except as approved specifically by SWCAA, the exhaust point or stack for each emission unit must discharge vertically above the roof level of the building or enclosure in which the emission unit is housed. Each stack must have sufficient undisturbed length to meet the requirements of 40 CFR 60 Appendix A Method 1 (e.g., 2.5 diameters undisturbed length). Any device that obstructs or prevents vertical discharge is prohibited.	1-2, 4, 6-18, 20-28, 31-32
28.	The Permittee must provide performance testing facilities as required under 40 CFR 60.8(e) including the following: (a) Sampling ports adequate for applicable test methods; (b) Safe sampling platform(s); (c) Safe access to sampling platform(s); and (d) Utilities for sampling and testing equipment.	1-2, 4, 6-18, 20-29, 31-32
29.	If SWCAA documents an opacity violation at any baghouse or bin vent exhaust, the Permittee must take immediate corrective action. SWCAA may require the Permittee to perform emission testing to demonstrate that emissions do not exceed the permitted emission limits after performance of corrective action.	1-2, 4, 6-18, 20-29, 31-32
30.	The entrance and exit to each screenings and dust bin loadout station must be equipped with plastic strips to minimize the amount of open space between the opening and the sides of the truck.	19
31.	Screenings and dust bin loadout must be conducted according to the following: (a) The associated screenings and dust bin loadout bin vent must be in operation at all times during which: (1) A loadout truck is parked under the spout and screenings or dust is being delivered to the truck; (2) The loadout truck is being repositioned under the spout; or (3) The associated baghouse is going through a cleaning cycle; (b) After the loadout truck is parked and ready to begin the screenings or dust bin loadout operation, the loader spout must be extended as far into the truck bed as can be safely maintained; (c) The loader spouts must be frequently moved within the truck bed so that tall piles do not develop; (d) If the truck needs to be repositioned during a screenings or dust bin loadout operation, the delivery of screenings or dust through the loadout spout must be suspended until the truck is repositioned; and (e) Any deviation from normal screenings or dust bin loader spout operation that results in fugitive emissions in excess of an applicable visible emission standard must be recorded in the operation log.	19
32.	Grain loaded into trucks must not exceed 60,000 ton/yr, all grains combined.	30
33.	Except for shipments for which a customer has specified that no oil be applied to the grain, only grain to which mineral oil has been applied can be loaded into trucks.	30
34.	Grain loaded into ships must not exceed 84,000 ton/day (any 24-hour period), all grains combined.	31-33



Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
35.	Except for shipments for which a customer has specified that no oil be applied to the grain and for which SWCAA has reviewed such specifications, only commodities to which mineral oil has been applied can be loaded into ships.	31-33
36.	When loading grain into ships using one or two ship loading spouts, at least one baghouse, either baghouse DC-9 or DC-10, must be in operation. The gate valves to the unused spouts and the unused baghouse must be closed.	31-32
37.	When loading grain into ships using three or more ship loading spouts, both baghouses DC-9 and DC-10 must be in operation.	31-32
38.	<p>While loading grain into any ship, ship loader spout operators must use proper dust preventive procedures. Such procedures must include the following, as a minimum:</p> <ul style="list-style-type: none"> <li>(a) The ship loader spouts must be installed, operated, maintained, and serviced in accordance with manufacturer's operating instructions and maintenance and service manuals;</li> <li>(b) Prior to loading grain, the ship loader spouts must be extended as far below the top of the ship's hold as can be safely maintained;</li> <li>(c) Grain cannot be loaded unless baghouses are being operated as specified in Condition 35 or 36;</li> <li>(d) At all times during initial fill, the ship loader spouts must be extended as far below the top of the ship's hold or as close to the top of the grain pile as can be safely maintained;</li> <li>(e) At all times during mid-hold fill and topping off, the distance from the bottom of the loading spout to the top of grain pile must be less than five (5) feet, unless the configuration of the ship or hold does not allow it;</li> <li>(f) The ship loader spouts must be frequently moved within the hold so that tall piles do not develop; and</li> <li>(g) Any deviation from normal ship loader spout operation that results in fugitive emissions in excess of an applicable visible emission standard must be recorded in the operation log.</li> </ul>	33
39.	No device can be connected to any spout that provides for the horizontal delivery of grain, including those horizontal delivery devices that allow grain to be loaded into the wing tanks of ships.	33
40.	All active process and road areas must be maintained to minimize fugitive dust formation and paved areas with vehicle traffic must be swept or washed as necessary to prevent excess fugitive emissions.	34
41.	The Emergency Generator Engine must only be fired on diesel fuel with a maximum sulfur content of 15 ppmw. Any fuel other than ultra-low sulfur fuel oil must be approved by SWCAA in writing prior to use.	35
42.	The Emergency Generator Engine must be equipped with a non-resettable hour meters to record hours of operation.	35
43.	Operation of the Emergency Generator Engine for maintenance checks and readiness testing must not exceed 100 hours per year, each. Emergency operation of the emergency engines is not limited.	35
44.	Operation of the Emergency Generator Engine is limited to maintenance checks, readiness testing, and as necessary to provide emergency power.	35

**Monitoring and Recordkeeping Requirements**

<b>Req. No.</b>	<b>Monitoring and Recordkeeping Requirements</b>	<b>Equipment/ Activity ID No.</b>
45.	All air quality related complaints, including odor complaints, received by the permittee and the results of any subsequent investigation or corrective action must be recorded for each occurrence.	Facility-wide
46.	All records required by this Permit must be kept for a minimum period of no less than three years and must be maintained in a form readily available for inspection by SWCAA representatives.	Facility-wide
47.	With the exception of data logged by a computerized data acquisition system, each record required by this Permit must include the date and the name of the person making the record entry. If a control device or process is not operating during a specific time period, a record must be made to that effect.	Facility-wide
48.	Excess emissions and upset conditions must be recorded for each occurrence.	1-35
49.	The following information concerning the facility must be collected, recorded at the intervals specified below, and readily available on-site for inspection: <ul style="list-style-type: none"> <li>(a) The daily (24-hour period) total of grain, all grains combined, unloaded from rail and from barge, each;</li> <li>(b) The daily (24-hour period) total of grain, all grains combined, loaded onto trucks and onto ships, each;</li> <li>(c) The monthly quantity of each grain received by rail and by barge;</li> <li>(d) The monthly total quantity of each grain loaded into ships and into trucks;</li> <li>(e) The monthly quantity of mineral oil applied to grain and the average rate at which oil was applied (qt/1,000 bu);</li> <li>(f) The types and quantities of commodities to which mineral oil was not applied must be recorded for each truck and ship loaded. For shipment for which a customer has specified that no oil be applied to the grain, the record must include adequate documentation that the customer specification precluded the application of mineral oil, including any correspondence from SWCAA;</li> <li>(g) The ship loading visible emissions report for each observation;</li> <li>(h) Emissions of PM, PM10, and PM2.5 must be calculated and recorded for each calendar month; and</li> <li>(i) The amount of screening and dust loaded out to trucks must be recorded for each calendar month.</li> </ul>	Facility-wide
50.	Plastic enclosure strips on the screenings and dust bin unloading stations must be inspected at least once per calendar week. A log of inspection results must be maintained, including identification of any damaged, broken, or missing enclosure strips. Damaged, broken, or missing strips must be repaired or replaced prior to the next weekly inspection.	19

<b>Req. No.</b>	<b>Monitoring and Recordkeeping Requirements</b>	<b>Equipment/ Activity ID No.</b>
51.	<p>The following information for each baghouse and powered bin vent filter must be collected, recorded at the intervals specified below, and readily available on-site for inspection:</p> <ul style="list-style-type: none"> <li>(a) Baghouse and powered bin vent filter maintenance (including bag and cartridge replacements), process upsets, and equipment upsets or breakdowns must be recorded for each occurrence;</li> <li>(b) The differential pressure across each operating baghouse and bin vent filter must be recorded each calendar week. A record must be made for any baghouse or bin vent filter (or associated source) that is not in operation for a specified monitoring period; and</li> <li>(c) The hours of operation for each baghouse and bin vent filter must be recorded for each calendar month.</li> </ul>	1-2, 4, 6-18, 20-29, 31-32
52.	<p>At least once per calendar month, the Permittee must conduct a visible emissions survey of all baghouse and bin vent filter exhausts. Personnel conducting the survey must be familiar with the conditions under which a valid visible emissions test should be performed. If a baghouse or bin vent filter exhaust is observed emitting any visible emissions, the Permittee must take action to correct the problem immediately. If the problem cannot be resolved in four (4) hours, the Permittee must notify SWCAA of the upset and continue to conduct repairs. Once repaired, a visible emissions observation must be conducted in accordance with SWCAA Method 9 to verify compliance with the applicable emission limit in Condition 4.</p>	1-2, 4, 6-18, 20-29, 31-32
53.	<p>The permittee must monitor and record:</p> <ul style="list-style-type: none"> <li>(a) The daily rate of railcar unloading (in ton/hr) for each day (any 24-hour period) in which railcars are unloaded;</li> <li>(b) The daily rate of barge unloading (in ton/hr) for each day (any 24-hour period) in which barges are unloaded;</li> <li>(c) The daily rate of ship loading (in ton/hr) for each day (any 24-hour period) in which ships are loaded; and</li> <li>(d) If no railcars or barges are unloaded or if no ship was loaded in a calendar day, a record must be made to that effect and the record must satisfy the monitoring requirement.</li> </ul>	1-4, 33
54.	<p>At least twice per calendar month during which ship loading operations occur, the Permittee must collect, record, and make readily available for on-site inspection, the following:</p> <ul style="list-style-type: none"> <li>(a) Fifteen (15) minutes of visible emission observations of ship loading during initial fill in accordance with SWCAA Method 9;</li> <li>(b) Thirty (30) minutes of visible emission observations of mid-hold ship loading shall in accordance with SWCAA Method 9; and</li> <li>(c) Fifteen (15) minutes of visible emission observations of ship loading during topping-off in accordance with SWCAA Method 9.</li> </ul> <p>All visible emission observations must be taken during a single ship loading event. If during any calendar month, no ships are loaded or there was no circumstance where valid Method 9 readings could be obtained, a record shall be made to that effect and the record must satisfy the observation requirement.</p>	33

**Emission Monitoring and Testing Requirements**

<b>Req. No.</b>	<b>Emission Monitoring and Testing Requirements</b>	<b>Equipment/ Activity ID No.</b>
55.	Baghouses DC-1, DC-2, DC-3, DC-4, DC-5, DC-6, DC-7, DC-8, DC-11, DC-14, DC-15, DC-16, DC-17, DC-20, DC-21, DC-22, DC-24, DC-25, DC-26, and DC-27 and bin vent filters DC-12, DC-13, DC-18, DC-19, and DC-23 must be emission tested no later than November 30, 2026. Periodic emission testing must be performed every 120 months thereafter, no later than the end of November of the year in which testing is due. All emission testing must be conducted in accordance with Appendix A of this permit.	1-2, 4, 6-18, 20-28
56.	Baghouses DC-9 and DC-10 must be emission tested no later than November 30, 2029 and every 120 months thereafter, no later than the end of November of the year in which testing is due. All emission testing must be conducted in accordance with Appendix A of this permit.	31-32
57.	Fugitive emissions from railcar receiving, barge receiving, and ship loading must be emission tested no later than November 30, 2026. Periodic emission testing must be performed every 120 months thereafter, no later than the end of November of the year in which testing is due. All emission testing must be conducted in accordance with Appendix B of this permit.	3, 5, 33
58.	Fugitive emissions from truck loading and dust and screenings loadout to truck, must be emission tested no later than November 30, 2023. Periodic emission testing must be performed every 120 months thereafter, no later than the end of November of the year in which testing is due. All emission testing must be conducted in accordance with Appendix B of this permit.	19, 30

**Reporting Requirements**

<b>Req. No.</b>	<b>Reporting Requirements</b>	<b>Equipment/ Activity ID No.</b>
59.	All air quality related complaints received by the permittee must be reported to SWCAA within three days of receipt. Complaint reports must include the following information: (a) Date and time of the complaint; (b) Name of the complainant; (c) Nature of the complaint; and (d) Description of corrective action taken in response to complaint (if any).	Facility-wide
60.	Upset conditions must be reported to SWCAA as soon as possible after discovery. Outside of normal business hours, upset conditions may be reported by email, fax, or leaving a telephone message with SWCAA.	Facility-wide

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
61.	<p>Excess emissions must be reported to SWCAA as follows:</p> <ul style="list-style-type: none"> <li>(a) As soon as possible, but no later than twelve (12) hours after discovery for emissions that represent a potential threat to human health or safety;</li> <li>(b) As soon as possible, but no later than forty-eight (48) hours after discovery for emissions which the Permittee wishes to claim as unavoidable pursuant to SWCAA 400-107(1); and</li> <li>(c) No later than thirty (30) calendar days after the end of the month of discovery for all other excess emissions.</li> </ul>	1-35
62.	<p>A written annual, January through December, emissions inventory report must be submitted to SWCAA by March 15 of each year for the previous calendar year in accordance with SWCAA 400-105(1). The report must contain, at a minimum:</p> <ul style="list-style-type: none"> <li>(a) Total quantity of PM, PM<sub>10</sub>, PM<sub>2.5</sub> emitted by the facility;</li> <li>(b) Total type (e.g., wheat, corn, soybean, etc.) and quantity of grain received by rail and by barge, each;</li> <li>(c) Total type and quantity of grain loaded to truck and to ship, each; and</li> <li>(d) Total hours of operation of each baghouse and bin vent filter.</li> </ul>	1-35
63.	<p>The following information must be reported to SWCAA no later than the end of the calendar month following each calendar quarter (e.g., information for the calendar quarter comprising January through March shall be reported no later than the end of April):</p> <ul style="list-style-type: none"> <li>(a) The monthly PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emission calculations;</li> <li>(b) The monthly quantity for each grain: <ul style="list-style-type: none"> <li>(1) Received by rail;</li> <li>(2) Received by barge;</li> <li>(3) Loaded to truck; and</li> <li>(4) Loaded to ship.</li> </ul> </li> <li>(c) The monthly quantity of mineral oil applied to each grain type and the average rate at which oil was applied (qt/1,000 bu);</li> <li>(d) Types and monthly quantities of commodities to which mineral oil has not been applied at the facility and documentation from customers requesting that oil not be added which has not been previously submitted to SWCAA;</li> <li>(e) The monthly hours of operation for each baghouse and bin vent filter;</li> <li>(f) The monthly quantity of screenings and dust loaded out by truck;</li> <li>(g) Biannual copies of opacity certification cards for each person reading visible emissions; and</li> <li>(h) The results of each set of visible emission observations taken during ship loading.</li> </ul>	1-35
64.	<p>Prior to loading any unoiled grain onto trucks or ships, the Permittee must provide written notice to SWCAA identifying the grain to be loaded, the approximate quantity of grain that the customer has requested that no oil be applied, and documentation describing the detrimental conditions that will result if oil is applied. This notice must be provided to SWCAA at least three (3) days prior to commencement of loading unless the nature of the contract precludes that amount of notice in which case SWCAA will be provided notice as soon as reasonably possible.</p>	30, 33

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
65.	The results of all emission testing required by this ADP must be reported to SWCAA in writing within forty-five (45) calendar days of test completion.	1-33

### 3. General Provisions

Req. No.	General Provisions
A.	For the purpose of ensuring compliance with this ADP, duly authorized representatives of the Southwest Clean Air Agency must be permitted access to the Permittee's premises and the facilities being constructed, owned, operated and/or maintained by the Permittee for the purpose of inspecting said facilities. These inspections are required to determine the status of compliance with this ADP and applicable regulations and to perform or require such tests as may be deemed necessary.
B.	The provisions, terms, and conditions of this ADP bind the Permittee, its officers, directors, agents, servants, employees, successors and assigns, and all persons, firms, and corporations acting under or for the Permittee.
C.	The requirements of this ADP survive any transfer of ownership of the source or any portion thereof.
D.	This ADP must be posted conspicuously at or be readily available near the source.
E.	This ADP will be invalidated, in whole or in part, if construction or installation of any new or modified equipment has not commenced within eighteen (18) months from date of issuance, if construction is discontinued for a period of eighteen (18) months or more without prior SWCAA approval, or if construction is not completed within a reasonable time.
F.	This ADP does not supersede requirements of other Agencies with jurisdiction and further, this ADP does not relieve the Permittee of any requirements of any other governmental Agency. In addition to this ADP, the Permittee may be required to obtain permits or approvals from other agencies with jurisdiction.
G.	Compliance with the terms of this ADP does not relieve the Permittee from the responsibility of compliance with SWCAA General Regulations for Air Pollution Sources, previously issued Regulatory Orders, RCW 70A.15, Title 173 WAC or any other applicable emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply.
H.	If any provision of this ADP is held to be invalid, all unaffected provisions of the ADP will remain in effect and be enforceable.
I.	No change in this ADP will be made or be effective except as may be specifically set forth by written order of the Southwest Clean Air Agency upon written application by the Permittee for the relief sought.
J.	The Southwest Clean Air Agency may, in accordance with RCW 70A.15, impose such conditions as are reasonably necessary to assure the maintenance of compliance with the terms of this ADP, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act.

## Appendix A

### Emission Testing Requirements Baghouses and Bin Vents

#### 1. Introduction:

The purpose of this testing is to quantify emissions from approved operations, and demonstrate compliance with the requirements of this Permit and applicable air quality regulations.

The following units are subject to 40 CFR 60 Subpart DD "Standards of Performance for Grain Elevators":

- ID 1: Baghouse DC-1
- ID 6: Baghouse DC-3
- ID 9: Baghouse DC-15
- ID 10: Baghouse DC-17
- ID 11: Baghouse DC-20
- ID 12: Baghouse DC-21
- ID 13: Baghouse DC-22
- ID 22: Baghouse DC-8
- ID 23: Baghouse DC-14
- ID 24: Baghouse DC-16
- ID 25: Baghouse DC-24
- ID 26: Baghouse DC-25
- ID 27: Baghouse DC-26
- ID 28: Baghouse DC-27
- ID 31: Baghouse DC-10

The following units are not subject to 40 CFR 60 Subpart DD:

- ID 2: Baghouse DC-2
- ID 4: Baghouse DC-11
- ID 7: Baghouse DC-4
- ID 8: Baghouse DC-5
- ID 14: Bin Vent Filter DC-12
- ID 15: Bin Vent Filter DC-13
- ID 16: Bin Vent Filter DC-18
- ID 17: Bin Vent Filter DC-19
- ID 18: Bin Vent Filter DC-23
- ID 20: Baghouse DC-6
- ID 21: Baghouse DC-7
- ID 30: Baghouse DC-9

#### 2. Test Constituents and Test Methods

- (a) Volumetric flow rate, gas velocity, and temperature using EPA Methods 1 and 2;
- (b) Moisture content of stack gas using EPA Method 4;
- (c) Particulate Matter (PM) using EPA Method 5 (front half) or Method 17, with the following exceptions:
  - (1) The sample volume for each run shall be at least 1.70 dscm (60 dscf);
  - (2) The probe and filter holder shall be operated without heaters;
  - (3) Filter media shall be constructed of borosilicate glass microfiber reinforces with woven glass cloth and bonded with polytetrafluoroethylene (PTFE) or equivalent; and
  - (4) Reagents used shall be low residue (<1 ppm residue) such as pesticide grade or equivalent; and
- (d) Visible Emissions (opacity) using SWCAA Method 9. The following units are only required to be tested for visible emissions:
  - ID 14: Bin Vent Filter DC-12
  - ID 15: Bin Vent Filter DC-13
  - ID 16: Bin Vent Filter DC-18
  - ID 17: Bin Vent Filter DC-19
  - ID 18: Bin Vent Filter DC-23

### 3. Test Plan and Notification

#### (a) Initial Emission Tests.

- ID 1: Baghouse DC-1; 2/2/2011
- ID 2: Baghouse DC-2; 2/2/2011
- ID 4: Marine Leg/Baghouse DC-11; 1/25/2011
- ID 6: Baghouse DC-3; 1/28/2011
- ID 7: Baghouse DC-4; 1/25/2011
- ID 8: Baghouse DC-5; 1/25/2011
- ID 9: Baghouse DC-15; 2/13/2002
- ID 10: Baghouse DC-17; 2/13/2002
- ID 11: Baghouse DC-20; 1/27/2011
- ID 12: Baghouse DC-21; 12/5/2011
- ID 13: Baghouse DC-22; 12/5/2011
- ID 14: Bin Vent Filter DC-12; 2/22/2011
- ID 15: Bin Vent Filter DC-13; 2/22/2011
- ID 16: Bin Vent Filter DC-18; 2/24/2011
- ID 17: Bin Vent Filter DC-19; 2/23/2011
- ID 18: Bin Vent Filter DC-23; 12/5/2011
- ID 20: Baghouse DC-6; 2/1/2011
- ID 21: Baghouse DC-7; 2/1/2011
- ID 22: Baghouse DC-8; 1/28/2011
- ID 23: Baghouse DC-14; 2/13/2002
- ID 24: Baghouse DC-16; 2/14/2002
- ID 25: Baghouse DC-24; 12/16/2011
- ID 26: Baghouse DC-25; 12/15/2011
- ID 27: Baghouse DC-26; 12/14/2011
- ID 28: Baghouse DC-27; 12/14/2011
- ID 30: Baghouse DC-9; 11/19/2019
- ID 31: Baghouse DC-10; 11/19/2019

- (b) Periodic Emission Tests. Periodic emission tests must be conducted on a continuing 120 month cycle, no later than the end of November of the year in which testing is due.

### 4. Test Requirements

#### (a) Notification.

- (1) A comprehensive test plan must be submitted to SWCAA for review and approval a minimum of ten (10) business days prior to the proposed test date.
- (2) SWCAA must be notified a minimum of three (3) business days prior to the proposed test date.

- (b) Test Location. Unless otherwise specified in writing by SWCAA, the tests must be performed at each exhaust air outlet of the applicable baghouse(s) for all constituents.

#### (c) Test Duration of Periodic Emission Tests.

- (1) Periodic emission tests for PM must include a minimum of three (3) test runs, each at least two (2) hours in duration, and be performed at normal maximum throughput or process operating conditions.
- (2) Periodic emission tests for visible emissions must include a minimum of three (3) 6-minute test runs with each run performed concurrently with each run of the PM test. If any individual reading of visible emissions is above the applicable emission limit, then an additional six (6) minutes of readings shall be taken. The total readings of visible emissions taken during a PM test run shall not exceed one (1) hour.

- (d) Source Operation. The emission unit being controlled must be operated at maximum achievable operating conditions unless otherwise approved in advance to establish that collected data is representative of normal operations.

- (e) Test Records. A complete record of production related parameters, process startups, shutdowns, and adjustments shall be kept during emissions testing to correlate operations with emissions and shall be recorded in the test results final report.



## 5. Reporting Requirements

The results of all required testing must be submitted to SWCAA within 45 days of test completion. Unless otherwise directed by SWCAA, a single hard copy of the report and an electronic copy (e.g., portable document format (.pdf)) of the report must be submitted. Each report must include:

- (a) Description of the source including manufacturer, model number, serial number, and design capacity of the equipment, and the location of the sample ports or test locations;
- (b) Time and date of the test and identification and qualifications of the personnel involved;
- (c) Summary of results, reported in units and averaging periods consistent with the application emissions standard or unit;
- (d) Summary of control system or equipment operating conditions,
- (e) Summary of production related parameters including the commodity being handled;
- (f) A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation;
- (g) A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation;
- (h) Copies of field data and example calculations;
- (i) Chain of custody information (if applicable);
- (j) Calibration documentation;
- (k) Discussion of any abnormalities associated with the results; and
- (l) A statement signed by the senior management official of the testing firm certifying the validity of the emission test report.

## 6. Changes to Testing Requirements

Emission testing must be conducted as specified in the sections above. The Permittee may submit a written request to SWCAA for approval of minor modifications to the requirements above or the testing schedule. Upon review of the request and in accordance with EPA delegation, SWCAA will inform the Permittee in writing of any approved modifications.

## **Appendix B**

### **Emission Testing Requirements**

#### **Fugitive Emission Sources**

#### **1. Introduction:**

The purpose of this testing is to demonstrate compliance with fugitive emission requirements of this Permit.

Fugitive emission sources at this facility include:

- ID 3: Railcar Receiving;
- ID 5: Barge Receiving System;
- ID 19: Dust and Screenings Loadout to Truck;
- ID 30: Truck Loading; and
- ID 33: Ship Loading.

#### **2. Test Constituents and Test Methods**

The Permittee must test for visible emissions (opacity) using SWCAA Method 9.

#### **3. Test Dates**

(a) Initial Emission Tests Completed. The initial tests have been performed per the following:

- ID 3: Railcar Receiving; 2/24/2011
- ID 5: Barge Receiving; 4/19/2017
- ID 19: Dust and Screenings Loadout to Truck; 11/26/2013
- ID 30: Truck Loading; 11/27/2013
- ID 33: Ship Loading; 2/24/2011

(b) Periodic Emission Tests. Periodic emission tests shall be conducted on a continuing 120-month cycle, no later than the end of November of the year in which testing is due.

#### **4. Test Requirements**

(a) Notification

- (1) A comprehensive test plan shall be submitted to SWCAA for review and approval a minimum of ten (10) business days prior to the proposed test date.
- (2) SWCAA shall be notified a minimum of three (3) business days prior to the proposed test date.

(b) Test Location. Testing shall be performed at the following locations:

- (1) Rail Receiving: at the entrance and exit of the railcar shed during grain unloading;
- (2) Barge Receiving System: at the top of the sump cap during grain unloading;
- (3) Dust and Screenings Loadout to Truck: at the entrance and exit of each truck loadout structure during dust or screenings loadout;
- (4) Truck Loading: at the top of the truck being loaded during grain loading; and
- (5) Ship Loading: at the top of the hatch being loaded during loading.

**4. Test Requirements (continued)**

- (c) Test Duration.
  - (1) Initial Emission Tests. The initial test for visible emissions shall be performed for a minimum of six (6) minutes for grain cleaning and internal grain handling.
  - (2) Periodic Emission Tests. Periodic testing for visible emissions shall include opacity readings for:
    - (A) Dust and Screenings Loadout to Truck: A minimum of three (3) trucks during the entire dust/screenings loadout process from at least one truck loading station (each loading station should be tested alternatively);
    - (B) Truck Loading: A minimum of three (3) trucks during the entire grain loadout process. The trucks should be of the same type;
    - (C) A minimum of one (1) hour (ten 6-minute averages) for all other sources.
- (d) Source Operation. The emission unit being controlled must be operated at maximum achievable operating conditions unless otherwise approved in advance to establish that collected data is representative of normal operations.
- (e) Test Records. A complete record of production related parameters, process startups, shutdowns, and adjustments shall be kept during emissions testing to correlate operations with emissions and shall be recorded in the test results final report.

**5. Reporting Requirements**

The results of all required testing must be submitted to SWCAA within 45 days of test completion. Unless otherwise directed by SWCAA, a single hard copy of the report and an electronic copy (e.g., portable document format (.pdf)) of the report must be submitted. Each report must include:

- (a) Description of the source including manufacturer, model number, serial number, and design capacity of the equipment, and the location of the sample ports or test locations;
- (b) Time and date of the test and identification and qualifications of the personnel involved;
- (c) Summary of results, reported in units and averaging periods consistent with the application emissions standard or unit;
- (d) Summary of control system or equipment operating conditions,
- (e) Summary of production related parameters including the commodity being handled;
- (f) A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation;
- (g) A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation;
- (h) Copies of field data and example calculations;
- (i) Discussion of any abnormalities associated with the results; and
- (j) A statement signed by the senior management official of the testing firm certifying the validity of the emission test report.

**6. Changes to Testing Requirements**

Emission testing must be conducted as specified in the sections above. The Permittee may submit a written request to SWCAA for approval of minor modifications to the requirements above or the testing schedule. Upon review of the request and in accordance with EPA delegation, SWCAA will inform the Permittee in writing of any approved modifications.