



August 5, 2024

Mary Mattix  
Port of Vancouver USA  
3101 Lower River Road  
Vancouver, Washington 98660

Subject: Final Approval for Reclassification of Engines and Elimination of Emergency Use Restrictions

Dear Mary Mattix:

A final determination to issue Air Discharge Permit / Nonroad Engine Permit (ADP/NEP) 24-3653 has been completed for ADP/NEP application CL-3267 pursuant to Sections 400-046(4) and 400-110(4) of the General Regulations for Air Pollution Sources of the Southwest Clean Air Agency (SWCAA). Public notice for ADP/NEP application CL-3267 was published in the permit section of SWCAA's website on March 26, 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/NEP 24-3653 and the associated Technical Support Document are available for public review in the "Recent Air Discharge Permits" section under the "Air Permits" link on SWCAA's website (<http://www.swcleanair.gov>). Original copies are enclosed for your files.

ADP/NEP 24-3653 may be appealed directly to the Pollution Control Hearings Board (PCHB) within thirty (30) days of receipt as provided in Revised Code of Washington (RCW) 43.21B.

If you have any questions or comments, or desire additional information, please contact me or Clint Lamoreaux at (360) 574-3058, extension 131.

Sincerely,

Uri Papish  
Executive Director

UP:cl

Enclosure: Technical Support Document and Air Discharge Permit 24-3653





**SWCAA**  
Southwest Clean Air Agency

**AIR DISCHARGE PERMIT / NONROAD ENGINE PERMIT  
24-3653**

**Issued: August 5, 2024**

**PORT OF VANCOUVER USA  
3103 NW River Road, Vancouver, WA**

**SWCAA ID – 779**



REVIEWED BY:

*Clinton H. Lamoreaux*

Clinton Lamoreaux, Chief Engineer

APPROVED BY:

*Uri Papish*

Uri Papish, Executive Director

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**1. Equipment/Activity Identification**

<b>ID No.</b>	<b>Equipment/Activity</b>	<b>Control Equipment/Measure</b>
1	Bulk Material Handling	Partial enclosure, Dalamatric baghouse for dusty materials
2	Terminal 5 Generator Engine (nonroad engine)	Ultra Low Sulfur Diesel ( $\leq 0.0015\%$ S) EPA Interim Tier 4
3	Unit 316 Compressor Engine (nonroad engine)	Ultra Low Sulfur Diesel ( $\leq 0.0015\%$ S)
4	Terminal 5 Well Pump Engine (stationary non-emergency)	Ultra Low Sulfur Diesel ( $\leq 0.0015\%$ S) Limited Operation ( $\leq 1,000$ hr/yr) EPA Tier 1
5	Pump House 3 Well Pump Engine (stationary emergency)	Ultra Low Sulfur Diesel ( $\leq 0.0015\%$ S) Limited operation – ( $\leq 100$ hr/yr + emergency usage)
6	Administration Offices Emergency Generator Engine (stationary emergency)	Propane fuel, Compliant with 40 CFR 60 Limited operation – ( $\leq 100$ hr/yr + emergency usage) Subpart JJJJ Emission Levels
7	Centennial Industrial Building (CIB) Emergency Fire Pump Engine (stationary emergency)	Ultra Low Sulfur Diesel ( $\leq 0.0015\%$ S) Limited operation – ( $\leq 100$ hr/yr + emergency usage) EPA Tier 3
8	Pump House 1 Emergency Generator Engine (stationary emergency)	Ultra Low Sulfur Diesel ( $\leq 0.0015\%$ S) Limited operation – ( $\leq 100$ hr/yr + emergency usage) EPA Tier 3

**2. Permit Requirements**

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

Air Discharge Permit / Nonroad Engine Permit 15-3167, SUN-163, and SUN-299 are superseded in their entirety by this Air Discharge Permit / Nonroad Engine Permit.

**Emission Limits**

<b>Req. No.</b>	<b>Emission Limits</b>	<b>Equipment/ Activity ID No.</b>								
1.	Visible emissions from bulk material handling controlled by the Permittee must not exceed 0% 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).	1								
2.	Fugitive PM <sub>10</sub> emissions from bulk material handling operations must not exceed 7.52 tpy.  Annual emissions must be calculated from actual material throughput using the methodology described in the Technical Support Document for this Air Discharge Permit.	1								
3.	Emissions of filterable particulate matter (PM, PM <sub>10</sub> , and PM <sub>2.5</sub> ) from the Dalamatic Baghouse must not exceed: (a) 0.005 gr/dscf (1-hour average) (b) 0.58 lb/yr (1-hour average) (c) 0.39 tpy  Annual emissions must be calculated from actual hours of operation using the methodology described in the Technical Support Document for this Air Discharge Permit.	1								
4.	Annual emissions from the Terminal 5 Well Pump Engine must not exceed:  <table style="margin-left: auto; margin-right: auto; border-collapse: collapse;"> <thead> <tr> <th style="border-bottom: 1px solid black; padding: 2px;">Engine</th> <th style="border-bottom: 1px solid black; padding: 2px;">NO<sub>x</sub> (tons)</th> <th style="border-bottom: 1px solid black; padding: 2px;">CO (tons)</th> <th style="border-bottom: 1px solid black; padding: 2px;">PM<sub>10</sub>/PM<sub>2.5</sub> (tons)</th> </tr> </thead> <tbody> <tr> <td style="padding: 2px;">Terminal 5 Well Pump Engine</td> <td style="padding: 2px; text-align: center;">3.41</td> <td style="padding: 2px; text-align: center;">0.74</td> <td style="padding: 2px; text-align: center;">0.242</td> </tr> </tbody> </table> Annual emissions must be calculated from actual hours of operation using the methodology presented in the Technical Support Document for this Air Discharge Permit.	Engine	NO <sub>x</sub> (tons)	CO (tons)	PM <sub>10</sub> /PM <sub>2.5</sub> (tons)	Terminal 5 Well Pump Engine	3.41	0.74	0.242	4
Engine	NO <sub>x</sub> (tons)	CO (tons)	PM <sub>10</sub> /PM <sub>2.5</sub> (tons)							
Terminal 5 Well Pump Engine	3.41	0.74	0.242							
5.	Visible emissions from the stationary and non-road engines must not exceed 10% 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: (a) The engine has reached normal operating temperature; or (b) The engine has been operating for 15 minutes.	2-8								

**Operating Limits and Requirements**

<b>Req. No.</b>	<b>Operating Limits and Requirements</b>	<b>Equipment/ Activity ID No.</b>
6.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from the Permittee's operations.	Facility-wide

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
7.	<p>Total throughput of bulk materials controlled by the Permittee must not exceed either of the following:</p> <ul style="list-style-type: none"> <li>(a) 600,000 tons per year total; and</li> <li>(b) 500,000 tons per year loaded without utilizing the hopper enclosure and Dalamatic Baghouse.</li> </ul>	1
8.	<p>All transfer of bauxite and bulk materials controlled by the Permittee must be conducted using the hopper enclosure vented to the Dalamatic Baghouse unless:</p> <ul style="list-style-type: none"> <li>(a) The material is urea or fertilizer;</li> <li>(b) SWCAA provides pre-approval to handle the material without the hopper enclosure vented to the Dalamatic Baghouse; or</li> <li>(c) The following conditions are met: <ul style="list-style-type: none"> <li>(1) The material contains no components considered hazardous air pollutants or toxic air pollutants; and</li> <li>(2) Visible emissions from transfer of the material do not exceed zero 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).</li> </ul> </li> </ul> <p>If the conditions in Section (c) are met, the Permittee need only provide notification to SWCAA. The handling of materials that require new equipment or procedures to limit visual emissions to zero percent opacity (e.g., flyash) is subject to New Source Review and permitting prior to receipt of new shipments.</p>	1
9.	<p>For any new material that is to be transferred without the hopper enclosure and Dalamatic Baghouse, the Permittee must conduct visual observations of the initial transfer operation using one of the options below to document compliance with the zero percent opacity limit:</p> <ul style="list-style-type: none"> <li>Option 1: Observe each transfer point for at least 6 minutes for the presence of visible emissions (dust) using EPA Method 22. If no visible emissions are observed during any of the observation periods, compliance with the zero percent opacity limit will be presumed.</li> <li>Option 2: Observe each transfer point for at least 6 minutes using EPA Method 9. For each observed reading in excess of zero percent opacity, extend the total observation period by an additional 6 minutes. The observation period ends when 13 observations in excess of zero percent opacity have been made or the observation period has lasted 60 minutes, whichever comes first.</li> </ul> <p>The results of the observations must be submitted to SWCAA within 14 days of completion.</p>	1

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.				
10.	With the exception of the Administration Offices Emergency Generator Engine, the stationary and non-road engines must only be fired on #2 diesel or better. The sulfur content of the fuel fired in the diesel engines must not exceed 0.0015% by weight (15 ppm). A fuel certification from the fuel supplier may be used to demonstrate compliance with this requirement.	2-5, 7-8				
11.	Operation of the Pump House 3 Well Pump Engine, the Administration Offices Emergency Generator Engine, the Centennial Industrial Building Emergency Fire Pump Engine, and the Pump House 1 Emergency Generator Engine must be limited to maintenance checks, readiness testing, and as necessary to provide emergency water pumping or emergency power.	5-8				
12.	<p>Operation of the Pump House 3 Well Pump Engine, the Administration Offices Emergency Generator Engine, the Centennial Industrial Building Emergency Fire Pump Engine, and the Pump House 1 Emergency Generator Engine for maintenance checks and readiness testing must not exceed 100 hours per year each. Actual emergency use is unrestricted.</p> <p>A nonresettable time totalizer must be maintained on each engine and used to measure hours of operation.</p>	5-8				
13.	<p>Operation of the Terminal 5 Well Pump Engine must not exceed:</p> <table border="1" data-bbox="256 1045 1300 1115"> <thead> <tr> <th data-bbox="256 1045 1073 1077"><u>Engine</u></th> <th data-bbox="1073 1045 1300 1077"><u>Hours per year</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="256 1077 1073 1115">Terminal 5 Well Pump Engine</td> <td data-bbox="1073 1077 1300 1115">1,000</td> </tr> </tbody> </table>	<u>Engine</u>	<u>Hours per year</u>	Terminal 5 Well Pump Engine	1,000	4
<u>Engine</u>	<u>Hours per year</u>					
Terminal 5 Well Pump Engine	1,000					
14.	With the exception of the Pump House 3 Well Pump Engine, the exhaust from each engine must be discharged vertically above the level of the building or enclosure in which it is housed. Any device that obstructs or prevents vertical discharge is prohibited.	2-4, 6-8				
15.	Operations that cause or contribute to odors that unreasonably interfere with any other property owner's use and enjoyment of their property must use recognized good practice and procedures to reduce those odors to a reasonable minimum.	Facility-wide				
16.	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.	Facility-wide				

**Monitoring and Recordkeeping Requirements**

<b>Req. No.</b>	<b>Monitoring and Recordkeeping Requirements</b>	<b>Equipment/ Activity ID No.</b>
17.	<p>The following information 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) The number of hours the portable Dalmatic baghouse is operated must be recorded for each calendar year;</li> <li>(b) The total amount (tons) of each Port of Vancouver bulk material transferred to or from vessels, trucks, or rail without the use of the hopper enclosure and portable Dalmatic baghouse must be recorded for each calendar year;</li> <li>(c) The total amount (tons) of each bulk material controlled by the Permittee transferred to or from vessels, trucks, or rail using the hopper enclosure and Dalmatic baghouse must be recorded for each calendar year;</li> <li>(d) The number of hours each engine identified in this Permit is operated must be recorded for each calendar year;</li> <li>(e) Maintenance activities that may affect emissions from the engines identified in this Permit must be logged for each occurrence;</li> <li>(f) The sulfur content of the diesel fuel burned in the engines identified in this Permit must be determined and recorded for each fuel delivery. A fuel supplier certification may be used in lieu of actual fuel testing.</li> <li>(g) Upset conditions that cause excess emissions must be recorded for each occurrence; and</li> <li>(h) All air quality related complaints, including odor complaints, received by the permittee regarding activities controlled by the Permittee and the results of any subsequent investigation or corrective action must be recorded for each occurrence.</li> </ul>	1-8
18.	With the exception of data logged by a computerized data acquisition system, each record required by this Air Discharge Permit must include the date and the name of the person making the record entry.	Facility-wide
19.	All records required by this Air Discharge Permit must be available on site for a minimum period of no less than three years and must be available for inspection by SWCAA representatives.	Facility-wide

**Emission Monitoring and Testing Requirements**

<b>Req. No.</b>	<b>Emission Monitoring and Testing Requirements</b>	<b>Equipment/ Activity ID No.</b>
	None	



**Reporting Requirements**

<b>Req. No.</b>	<b>Reporting Requirements</b>	<b>Equipment/ Activity ID No.</b>
20.	The Permittee must notify SWCAA at least seven days in advance of receiving any new bulk material controlled by the Permittee and indicate what procedures will be used to handle the material. The notice must include a Safety Data Sheet or equivalent information for the new material.	1
21.	The results of the visual observations of transferring a new bulk material controlled by the permittee without the use of the hopper enclosure and portable Dalamatic baghouse must be submitted to SWCAA within 14 days of completion of the observation.	1
22.	The following emissions related records must be reported to SWCAA by March 15 <sup>th</sup> for the previous calendar year: <ul style="list-style-type: none"> <li>(a) The number of hours the portable Dalamatic baghouse was operated;</li> <li>(b) The total amount (tons) of each bulk commodity controlled by the Permittee that is transferred without the use of the hopper enclosure and portable Dalamatic baghouse;</li> <li>(c) The total amount (tons) of each bulk material controlled by the Permittee that is transferred using the hopper enclosure and portable Dalamatic baghouse; and</li> <li>(d) The number of hours each engine identified in this Permit was operated.</li> </ul>	1-8
23.	Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs) must be reported annually to SWCAA by March 15 <sup>th</sup> for the previous calendar year.	1-8
24.	Excess emissions must be reported to SWCAA as follows: <ul style="list-style-type: none"> <li>(a) As soon as possible, but no later than 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 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 30 days after the end of the month of discovery for all other excess emissions.</li> </ul>	Facility-wide
25.	All air quality related complaints received by the Permittee regarding activities controlled by the Permittee must be reported to SWCAA within three days of receipt.	Facility-wide

**3. General Provisions**

<b>Req. No.</b>	<b>General Provisions</b>
A.	For the purpose of ensuring compliance with this ADP/NEP, 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/NEP and applicable regulations and to perform or require such tests as may be deemed necessary.
B.	The provisions, terms, and conditions of this ADP/NEP 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/NEP survive any transfer of ownership of the source or any portion thereof.
D.	This ADP/NEP must be posted conspicuously at or be readily available near the source.
E.	This ADP/NEP 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/NEP does not supersede requirements of other agencies with jurisdiction and further, this ADP/NEP does not relieve the Permittee of any requirements of any other governmental agency. In addition to this ADP/NEP, the Permittee may be required to obtain permits or approvals from other agencies with jurisdiction.
G.	Compliance with the terms of this ADP/NEP 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/NEP is held to be invalid, all unaffected provisions of the ADP/NEP will remain in effect and be enforceable.
I.	No change in this ADP/NEP 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 ensure the maintenance of compliance with the terms of this ADP/NEP, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act.
K.	For the purposes of establishing if a condition of this ADP/NEP has been violated or is being violated, nothing in this ADP/NEP precludes the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test procedures or methods had been performed.