



March 26, 2025

Mr. Ted Fick, Chief Executive Officer
Vancouver Bulk Terminal, Inc.
2701 NW Harborside Drive
Vancouver, WA 98660

Subject: Final Air Discharge Permit for New Soda Ash Export Terminal

Dear Mr. Fick:

A final determination to issue Air Discharge Permit 25-3696 (ADP 25-3696) has been completed for Air Discharge Permit (ADP) Application CL-3283 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 CL-3283 was published in the permit section of SWCAA's internet website on December 13, 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 was not provided for this permitting action. Electronic copies of ADP 25-3696 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 25-3696 and Technical Support Document





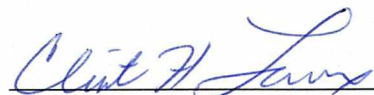
**AIR DISCHARGE PERMIT
25-3696**

Issued: March 26, 2025

Vancouver Bulk Terminal
2735 NW Harborside Drive, Vancouver, WA 98660

SWCAA ID - 1920

REVIEWED BY:


Clinton Lamoreaux, Chief Engineer



APPROVED BY:

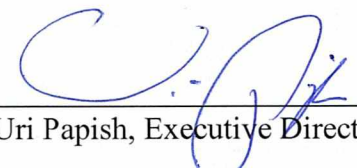

Uri Papish, Executive Director

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Material Handling Dust Collectors	

1. Equipment/Activity Identification

ID No.	Equipment/Activity	Control Measure/Equipment
1	Railcar Unloading - Fugitives	Process Enclosure, High Efficiency Filtration
2	Railcar Unloading / DC1 (Airlanco - 17,000 acfm)	Process Enclosure, High Efficiency Filtration
3	SASE / DC2 (MAC - 48,000 acfm)	Process Enclosure, High Efficiency Filtration
4	Ship Loader / SL1DC1 (IAC – 2,000 acfm)	Process Enclosure, High Efficiency Filtration
5	Ship Loading - Fugitives	Process Enclosure, High Efficiency Filtration

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 25-3696 supersedes ADP 23-3615 in its entirety.

Emission Limits

Req. No.	Emission Limits	Equipment/ Activity ID No.				
1.	Particulate matter emissions from approved dust collectors must not exceed a concentration of 0.005 gr/dscf (1-hour average).	2-4				
2.	<div>Combined emissions from bulk material handling and storage operations must not exceed the following:</div> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>PM₁₀</td><td>7.56 tpy</td></tr></table> <div>Annual emissions must be calculated from actual material throughput consistent with the methodology in Section 6 of the Technical Support Document for this Permit.</div>	<u>Pollutant</u>	<u>Emission Limit</u>	PM ₁₀	7.56 tpy	1-5
<u>Pollutant</u>	<u>Emission Limit</u>					
PM ₁₀	7.56 tpy					

Req. No.	Emission Limits	Equipment/ Activity ID No.										
3.	<p>Visible emissions from approved operations must not exceed the opacity values listed below for more than 3 minutes in any one hour period as determined by a Certified Observer certified in accordance with SWCAA Method 9.</p> <table><tr><td><u>Operation</u></td><td><u>Opacity Limit</u></td></tr><tr><td>Baghouse exhaust</td><td>0%</td></tr><tr><td>General material handling operations</td><td>0%</td></tr><tr><td>Ship loading other than 'topping off'</td><td>5%</td></tr><tr><td>Ship loading during initial fill and topping off</td><td>20%</td></tr></table> <p>"Initial fill" is defined as any period of ship loading during which a commodity is initially deposited into a ship hold. The period ends at the point when the ship loading spout is capable of making full contact with material in the hold. 'Topping off' is defined as any period of ship loading during which the top of the material pile in a ship's hold is at, or above, the plane formed by the hatch of the hold.</p>	<u>Operation</u>	<u>Opacity Limit</u>	Baghouse exhaust	0%	General material handling operations	0%	Ship loading other than 'topping off'	5%	Ship loading during initial fill and topping off	20%	1-5
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Operating Limits and Requirements

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
4.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
5.	The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facility-wide
6.	Each pollution control device/measure must be in use whenever the associated production equipment is in operation. Control devices must be operated and maintained in accordance with the manufacturer's specifications and operated in a manner that minimizes emissions.	1-5
7.	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.	1-5
8.	The Permittee must have at least one employee at the facility with a valid Method 9 certification. A certified individual must be present on-site during all active material handling operations.	1-5
9.	Whenever visible emissions with the potential to exceed an applicable visual emission limit are observed, at least six minutes of opacity observations of the affected source must be conducted using SWCAA Method 9 if conditions are conducive to such observation. For every reading in excess of the applicable opacity standard, opacity must be read for an additional 6 minutes to a maximum total of 60 minutes or 13 readings in excess of the opacity standard, whichever occurs first.	1-5

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
10.	Railcar loading and unloading must be conducted with reviewed and approved bulk material handling and emissions control equipment.	1
11.	Permittee must install and maintain one of the following in each dust collector: (a) A differential pressure gauge capable of continuously monitoring differential pressure across the filtering media; or (b) A leak detection system meeting the requirements in 40 CFR 63.1206(c)(8)(ii).	2-3
12.	Exhaust air from each approved dust collector must be discharged vertically into the ambient air. Any device that obstructs or prevents vertical discharge is prohibited.	2-3
13.	Wind speed during ship loading must be monitored continuously during ship loading operations. Ship loading operations must be curtailed if sustained wind speed exceeds 35 miles per hour.	5

Monitoring and Recordkeeping Requirements

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
14.	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
15.	For each product used or produced at the facility that contains VOC, HAP, or TAP, the Permittee must maintain purchase receipts for quantities, Safety Data Sheet information, and Technical Data Sheets in a readily accessible form.	Facility-wide
16.	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.	1-5
17.	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.	1-5
18.	Excess emissions and upset conditions must be recorded for each occurrence.	1-5

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.																		
19.	<p>The following information must be collected, recorded at the intervals specified below, and readily available on-site for inspection:</p> <table><tr><td>(a) Quantity of material throughput</td><td>Recorded monthly</td></tr><tr><td>(b) Hours of operation for each dust collector</td><td>Recorded monthly</td></tr><tr><td>(c) Moisture content of material handled</td><td>Recorded for each shipment</td></tr><tr><td>(d) Differential pressure across filter media</td><td>Recorded weekly</td></tr><tr><td>(e) Dust collector leak detector alarms</td><td>Recorded for each occurrence</td></tr><tr><td>(f) Wind speed during ship loading</td><td>Recorded for each occurrence</td></tr><tr><td>(g) Filter bag replacement</td><td>Recorded for each occurrence</td></tr><tr><td>(h) Maintenance and repair of emission control equipment</td><td>Recorded for each occurrence</td></tr><tr><td>(i) Opacity training and certifications</td><td>Record each certification</td></tr></table>	(a) Quantity of material throughput	Recorded monthly	(b) Hours of operation for each dust collector	Recorded monthly	(c) Moisture content of material handled	Recorded for each shipment	(d) Differential pressure across filter media	Recorded weekly	(e) Dust collector leak detector alarms	Recorded for each occurrence	(f) Wind speed during ship loading	Recorded for each occurrence	(g) Filter bag replacement	Recorded for each occurrence	(h) Maintenance and repair of emission control equipment	Recorded for each occurrence	(i) Opacity training and certifications	Record each certification	1-5
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Emission Monitoring and Testing Requirements

Req. No.	Emission Monitoring and Testing Requirements	Equipment/ Activity ID No.
20.	The permittee must conduct initial and periodic emission testing of Dust Collectors DC1 and DC2 as described in Appendix A of this Permit. The Permittee must provide adequate and safe access to sampling ports meeting the criteria of EPA Method 1 (40 CFR 60, Appendix A).	2-3

Reporting Requirements

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
21.	<p>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:</p> <ul style="list-style-type: none"> (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

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
22.	<p>A written report must be submitted to SWCAA at least 7 calendar days prior to handling any new product that contains VOCs, TAPs, or HAPs. The report must contain the following:</p> <ul style="list-style-type: none"> (a) A description of the product (e.g., resin, paint, solvent, etc.), Safety Data Sheet information, and the location where the product will be used; (b) The date by which the Permittee intends to begin use of the product; (c) The amount of product expected to be used; (d) A quantification of the change in VOC, HAP and TAP emissions from use of the product; and (e) A summary of any applicable requirement that would apply as a result of using the product. <p>If handling of the new product would cause any emission limit or SQER to be exceeded, the Permittee must submit an ADP application to SWCAA to request a revision to this ADP. The Permittee must not handling the new product until a revised ADP is issued.</p>	Facility-wide
23.	<p>Excess emissions must be reported to SWCAA as follows:</p> <ul style="list-style-type: none"> (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; (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; and (c) No later than 30 days after the end of the month of discovery for all other excess emissions. 	1-5
24.	Emission test results must be reported to SWCAA in writing within 45 days of test completion.	2-3
25.	Initial start-up of SWCAA approved emission units must be reported to SWCAA, in writing, within 10 days of commencing regular operation.	1-5
26.	<p>The following emission-related information must be reported to SWCAA by March 15th for the previous calendar year:</p> <ul style="list-style-type: none"> (a) Quantity of material throughput; (b) Hours of operation for each dust collector; (c) Moisture content of material handled; and (d) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs). 	1-5

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.

Req. No.	General Provisions
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.
K.	For the purposes of establishing if a condition of this ADP has been violated or is being violated, nothing in this ADP 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.

Appendix A

Emission Testing Requirements

Material Handling Dust Collectors

1. Introduction:

The purpose of this testing is to quantify emissions from the material handling dust collectors, and demonstrate compliance with the requirements of this Permit and applicable air quality regulations.

2. Testing Requirements:

- a. **Testing Schedule.** Emission testing of Dust Collectors DC1 and DC2 must be conducted no later than 90 days after commencing regular operation. Subsequent emission testing of each unit must be conducted on a rolling 7 year cycle, no later than the end of the calendar month in which the initial emission test was performed. Emission testing may be conducted up to three calendar months prior to the month in which testing is due. Testing before or after the scheduled due date does not modify or reset the test schedule.
- b. **Test Plan.** A comprehensive test plan must be submitted to SWCAA for review and approval at least 10 business days prior to the proposed test date. SWCAA personnel must be informed at least 5 business days prior to testing so that a representative may be present during testing.
- c. **Test Location.** Sampling must be conducted at the exhaust stack of each baghouse.
- d. **Test Runs/Reference Test Methods.** A minimum of 3 test runs must be performed for each constituent listed below to ensure the data are representative. Compliance must be demonstrated by averaging the results of the individual sampling runs.

<u>Constituent</u>	<u>Reference Test Method</u>	<u>Minimum Test Run Duration</u>
Flow rate, temperature	EPA Methods 1 and 2	N/A
O ₂ , CO ₂ content	EPA Method 3 or 3A*	60 minutes
Moisture content	EPA Method 4	60 minutes
PM	EPA Method 5 or 17	60 minutes
Opacity	SWCAA Method 9	6 minutes*

* Ambient concentrations of O₂ and CO₂ can be assumed instead of using Method 3.

** For every reading in excess of the opacity standard, opacity must be read for an additional 6 minutes to a maximum total of 60 minutes or 13 readings in excess of the opacity standard, whichever is shorter.

3. Source Operation:

- a. **Source Operations.** Source operations during the emissions test must be representative of maximum intended operating conditions.
- b. **Record of Production Parameters.** Production related parameters and equipment operating conditions must be recorded during emissions testing to correlate operating conditions with emissions. All recorded production parameters must be documented in the test results report. At a minimum, the following parameters must be recorded:
 - (1) Type of material being handled;
 - (2) Quantity of material handled;
 - (3) Process startups/shutdowns, and
 - (4) Plant adjustments.

4. Reporting Requirements:

- a. **Test Report.** Unless otherwise directed by SWCAA, a final test report must be prepared and submitted to SWCAA in an approved form within 45 calendar days of test completion and, at a minimum, must contain the following information:
- (1) Description of the source including manufacturer, model number and design capacity of the equipment, and the location of the sample ports or test locations;
 - (2) A brief description of the purpose of the test, for example, an initial test, a periodic test required by an ADP, a test required by a federal, state, or local rule or regulation, or a test required to determine compliance with a Notice to Correct;
 - (3) Time and date of the test and identification and qualifications of the personnel involved, including SWCAA personnel who observed the testing;
 - (4) The location and description of the discharge point (stack, port, etc.), including the dimensions (diameter, length and width, or other) and height above ground level. A photo of the discharge point is highly recommended;
 - (5) The location of the sample ports or test location and a description of how the sampling location relates to the discharge point. For example, the sampling location may be in a square duct some distance away from the discharge point, which is a round stack. A photo of the sample ports or test location is highly recommended;
 - (6) Summary of results, reported in units and averaging periods consistent with the applicable emissions standard or unit;
 - (7) Summary of control system or equipment operating conditions;
 - (8) Summary of production related parameters, including those cited in Section 3;
 - (9) A description of the test methods or procedures used, including all field data, quality assurance/quality control procedures and documentation;
 - (10) A description of the analytical procedures used, including all laboratory data, quality assurance/quality control procedures and documentation;
 - (11) Copies of field data and example calculations;
 - (12) Chain of custody information;
 - (13) Calibration documentation;
 - (14) Discussion of any abnormalities associated with the results; and
 - (15) A statement signed by the senior management official of the testing firm certifying the validity of the source test report. Test reports with material mistakes or misinformation may be rejected by SWCAA.
- b. **Test Results.** All test results must be reported as measured.

5. 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.