TECHNICAL SUPPORT DOCUMENT

Air Discharge Permit ADP 25-3696
Air Discharge Permit Application CL-3283

Issued: March 26, 2025

Vancouver Bulk Terminal

SWCAA ID - 1920

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Southwest Clean Air Agency

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ABBREVIATIONS

List of Acronyms

ADP	Air Discharge Permit
AP-42	Compilation of Emission Factors, AP-42, 5th Edition, Volume 1, Stationary Point and Area Sources – published by EPA
ASIL	Acceptable Source Impact Level
BACT	Best available control technology
CAM	Compliance Assurance Monitoring
CAS#	Chemical Abstracts Service registry number
CFR	Code of Federal Regulations
EPA	U.S. Environmental Protection Agency
EU	Emission Unit
NOV	Notice of Violation/
NSPS	New Source Performance Standard
PSD	Prevention of Significant Deterioration
RCW	Revised Code of Washington
SCC	Source Classification Code
SDS	Safety Data Sheet
SQER	Small Quantity Emission Rate listed in WAC 173-460
Standard	Standard conditions at a temperature of 68°F (20°C) and a pressure of 29.92 in Hg (760 mm Hg)
SWCAA	Southwest Clean Air Agency
T-BACT	Best Available Control Technology for toxic air pollutants
WAC	Washington Administrative Code

List of Units and Measures

µg/m³	Micrograms per cubic meter
µm	Micrometer (10^{-6} meter)
acfm	Actual cubic foot per minute
bhp	Brake horsepower
dscfm	Dry Standard cubic foot per minute
gr/dscf	Grain per dry standard cubic foot
MMBtu	Million British thermal unit
ppm	Parts per million
ppmv	Parts per million by volume
ppmvd	Parts per million by volume, dry
ppmw	Parts per million by weight
scfm	Standard cubic foot per minute
tph	Ton per hour
tpy	Tons per year

List of Chemical Symbols, Formulas, and Pollutants

CO	Carbon monoxide
CO_2	Carbon dioxide
CO_2e	Carbon dioxide equivalent
HAP	Hazardous air pollutant listed pursuant to Section 112 of the Federal Clean Air Act
NH_3	Ammonia
NO_X	Nitrogen oxides
O_2	Oxygen
O_3	Ozone
PM	Particulate Matter with an aerodynamic diameter 100 µm or less
PM_{10}	PM with an aerodynamic diameter 10 µm or less
$PM_{2.5}$	PM with an aerodynamic diameter 2.5 µm or less
SO_2	Sulfur dioxide
SO_x	Sulfur oxides
TAP	Toxic air pollutant pursuant to Chapter 173-460 WAC
VOC	Volatile organic compound

Terms not otherwise defined have the meaning assigned to them in the referenced regulations or the dictionary definition, as appropriate.

1. FACILITY IDENTIFICATION

Applicant Name:	Vancouver Bulk Terminal
Applicant Address:	2701 NW Harborside Drive, Vancouver, WA 98660
Facility Name:	Vancouver Bulk Terminal
Facility Address:	2735 NW Harborside Drive, Vancouver, WA 98660
SWCAA Identification:	1920
Contact Person:	Ted Fick, Chief Executive Officer
Primary Process:	Bulk Commodities Handling
SIC/NAICS Code:	4491 / Marine Cargo Handling 488310 / Port and Harbor Operations
Facility Latitude and Longitude	45° 38' 18.77" N 122° 42' 17.99" W
Facility Classification:	Natural Minor

2. FACILITY DESCRIPTION

Vancouver Bulk Terminal (VBT) operates a operates a trans-loading facility for bulk materials at the Port of Vancouver (Terminal 2, Berth 7). The facility receives material by rail and truck. The facility ships material by marine vessel. The facility has previously handled ore concentrates, clay, beet pellets, mill scale, and tire chips.

3. CURRENT PERMITTING ACTION

This permitting action is in response to Air Discharge Permit application number CL-3283 (ADP Application CL-3283) dated December 4, 2024. VBT submitted ADP Application CL-3283 requesting approval of the following:

- Conversion of the existing bulk material handling facility to use as a dedicated soda ash export terminal.

ADP 25-3696 will supersede ADP 23-3615 in its entirety.

4. PROCESS DESCRIPTION

4.a. Bulk Material Handling and Storage (*existing*). This facility receives, stores and ships varies bulk commodities at Terminal 2 of the Port of Vancouver. Bulk material is received by railcar or truck and shipped by marine vessel. Bulk material may be stored in either enclosed buildings or open storage.

ADP Application CL-3283. VBT is proposing to redevelop the existing bulk export terminal into a dedicated soda ash export terminal. Subsequent to redevelopment, copper concentrate and bentonite clay will no longer be handled at this facility. The facility is designed to handle soda ash at rates of up to 2,000 tph and 3,300,000 tpy.

Soda ash is received at the existing railcar unloading building. The receiving pit will be modified to accommodate the change in product. Receiving operations are vented to the existing DC1 baghouse. Soda ash is transferred from the railcar unloading building to the soda ash storage enclosure (SASE) using fully enclosed belt conveyors. Received soda ash is placed in flat storage or transferred directly to the shiploader at Berth 7. The new SASE has a footprint of approximately 228 feet by 509 feet and is equipped with a stacker/scraper and conveyance systems for moving product into and out of storage. Payloaders and a reclaim hopper are used for emergency reclaim of material when the scraper is not functional. Fugitive emissions from operations within the SASE are controlled by maintaining a slight negative headspace pressure on the building using the existing DC2 baghouse.

Soda ash is conveyed from storage to a new shiploader using fully enclosed belt conveyors. The new shiploader is configured with an onboard dust collector (SL1DC1) and a cascade-style, retractable loading spout. The loading spout has automatic level adjustment and is capable of extending to near the bottom of the vessel hold to minimize drop distance. The loading spout has internal baffles to slow the velocity of the soda ash during its descent through the telescoping loading spout. Ship loading operations are not conducted during heavy rain events. A funnel attachment is used to allow ship loading through vessel cement hatches during light rain events. The funnel attachment is stowed on the dock when not in use.

As proposed, the facility will operate multiple dust collectors that exhaust within building enclosures. Emissions from these units is assumed to be negligible. A list of proposed units is below.

Unit	*Location*
BV1	*Surge Bin SB-1*
DC3	*Belt Conveyor BC-3*
DC4A	*Belt Conveyor BC-4*
DC4B	*Belt Conveyor BC-4*
DC6	*Belt Conveyor BC-5 / Belt Conveyor BC-6*
SR1DC1	*Portable Stacker*
SR1DC2	*Scraper Reclaimer*
DC7	*Belt Conveyor BC-7*
DC8	*Belt Conveyor BC-8*

5. EQUIPMENT/ACTIVITY IDENTIFICATION

5.a. Railcar Unloading – Fugitive Emissions (*modified*). Railcars are unloaded using a dedicated receiving building. Material is gravity fed from bottom dump railcars into enclosed receiving hoppers and transferred using enclosed belt conveyors. Process emissions are controlled by process enclosure (below grade hoppers, hopper baffles, building enclosure) and a dedicated dust collector (DC1). Uncontrolled emissions are emitted as fugitive dust.

Location: 45°38'25.3"N 122°42'13.6"W
SCC Code: 30510598

5.b. Railcar Unloading Dust Collector / DC1 (*existing*). This unit is the dust collector dedicated to controlling emissions from railcar unloading operations.

Mfg / Model:	Airlanco / 169AST10-III
Blower:	Industrial Air model BCHS 372
Rated Airflow:	17,000 acfm
Filtration Area / Media:	2,772 ft^2
Filter Bags:	169 filter bags, each 10' x 6.0" dia
Cleaning System:	Reverse pulse jet
Exhaust Configuration:	27" x 24" discharging vertical at ~10.6' above grade
Location:	45°38'25.3"N 122°42'13.6"W
SCC Code:	30510598

ADP Application CL-3283. VBT proposes to modify the existing railcar receiving building to accommodate transfer of bulk soda ash from bottom dump railcars. DC1 will remain in service.

5.c. Soda Ash Storage Enclosure / DC2 (*modified*). This unit is a 228' by 509' flat storage area used to store and transship bulk soda ash. The storage area and associated handling equipment is fully enclosed. Process emissions are controlled by process enclosure and a dedicated dust collector (DC2).

Mfg / Model:	MAC / 144MCF494
Rated Airflow:	48,000 acfm
Filtration Area / Media:	7,163 ft^2
Filter Bags:	144 filter bags
Cleaning System:	Reverse pulse jet
Exhaust Configuration:	42" x 48" discharging horizontal at ~6' above grade
Location:	45°38'21.89"N 122°42'15.77"W
SCC Code:	30510598

ADP Application CL-3283. VBT proposes to construct a new flat storage building to store bulk soda ash. This building will replace an existing storage building. DC2 will be reconfigured to control dust emissions within the building headspace.

5.d. Ship Loader Dust Collector / SL1DC1 (*new*). This dust collector is used in conjunction with enclosed conveyor belts and a loading spout to control emissions from ship loading.

Mfg / Model:	IAC / 96TB-BVI-25:S6
Rated Airflow:	2,000 acfm
Filtration Area / Media:	2,772 ft^2
Filter Bags:	169 filter bags, each 10' x 6"
Cleaning System:	Reverse pulse jet
Exhaust Configuration:	13" dia discharging at 101' above grade
Location:	45°38'11.62"N 122°42'23.70"W
SCC Code:	30510598

ADP Application CL-3283. VBT proposes to install a dust collector dedicated to controlling emissions from conveyor belt SL1 and the ship loading spout.

5.e. Ship Loading – Fugitive Emissions (modified). Bulk material is loaded into ship holds using enclosed conveyor belts and a single retractable loading spout. The loading spout has automatic level adjustment and internal baffles to slow the velocity of the material during its descent through the spout. Process emissions are controlled by process enclosure and a dedicated dust collector (SL1DC1). Uncontrolled emissions are emitted as fugitive dust.

Location:	45°38'11.1"N 122°42'24.3"W
SCC Code:	30510598

ADP Application CL-3283. VBT proposes to install a new ship loading spout and associated emission control equipment to transfer bulk soda ash to ships. Existing ship loading spouts will be removed from service.

The following equipment will be removed from service:

5.f. Baghouse 3 (DC-3) / Reclaim Conveyors (removed). This dust collector is used in conjunction with partial enclosure to control emissions from material transfer between Conveyors R1 and R2.

Mfg / Model:	*MAC / 96ABS64*
Blower:	*Zurn-Clarage model 217XL*
Rated Airflow:	*4,650 acfm*
Filtration Area / Media:	*788 ft^2*
Filter Bags:	*64 filter bags, each 8' x 5.875"*
Cleaning System:	*Reverse pulse jet*
Exhaust Configuration:	*12" x 16" discharging horizontal at 60' above grade*
Location:	*45°38'12.6"N 122°42'23.5"W*

5.g. Baghouse 4 (DC-4) / Reclaim Conveyor (removed). This dust collector is used in conjunction with partial enclosure to control emissions from Conveyor R3.

Mfg / Model:	*MAC / 96ABS36*
Blower:	*Zurn-Clarage model 213XL*
Rated Airflow:	*2,550 acfm*
Filtration Area / Media:	*443 ft^2*
Filter Bags:	*36 filter bags, each 8' x 5.875"*
Cleaning System:	*Reverse pulse jet*
Exhaust Configuration:	*12" x 16" discharging horizontal at 45' above grade*
Location:	*45°38'12.9"N 122°42'23.6"W*

5.h. Baghouse 5 (DC-5) / Reclaim Conveyor and Ship Loader (removed). This dust collector is used to control emissions from the head chute of Conveyor R4 and the ship loader spout.

Mfg / Model:	*Fabric Filters Air Systems / 132-10*
Blower:	*Twin-City model #M/N 245*
Rated Airflow:	*12,500 acfm*
Filtration Area / Media:	*2,072 ft^2*
Filter Bags:	*132 filter bags, each 10' x 6"*
Cleaning System:	*Reverse pulse jet*
Exhaust Configuration:	*12" x 16" discharging horizontal at 45' above grade*
Location:	*45°38'12.3"N 122°42'23.7"W*

5.i. *Baghouse 6 (DC-6) / Clay Storage Building (removed).* *This dust collector is used to control emissions from material transfer between Conveyors BC-2 and U2 and other points along Conveyor U2.*

Mfg / Model:	*Airlanco / 36AST10-III1 (s/n 80402543-0001)*
Blower:	*Industrial Air model BCHS 187*
Rated Airflow:	*3,000 acfm*
Filtration Area / Media:	*590 ft^2*
Filter Bags:	*36 filter bags, each 10' x 6.0" dia*
Cleaning System:	*Reverse pulse jet*
Exhaust Configuration:	*11" x 14" discharging vertical at ~7.5' above grade*
Location:	*45°38'24.3"N 122°42'14.2"W*

5.j. *Baghouse 7 (DC-7) / Ore Reclaim (removed).* *This dust collector is used in conjunction with building enclosure to control emissions from ore reclaim operations in the Ore Storage Building.*

Mfg / Model:	*Fabric Filters Air Systems / 12-1M-8*
Rated Airflow:	*2,500 acfm (practical max - 1,750 acfm)*
Filtration Area / Media:	*336 ft^2*
Filter Bags:	*12 filters, each 40" x 6.0" dia*
Cleaning System:	*Reverse pulse jet*
Exhaust Configuration:	*12" x 14" discharging horizontal at 14' above grade*
Location:	*45°38'23.0"N 122°42'14.4"W*

5.k. *Ship Loader Dust Collector (DC-4) (removed).* *This dust collector is used in conjunction with partial enclosure to control emissions from Conveyor R3.*

Mfg / Model:	*MAC / 96ABS36*
Blower:	*Zurn-Clarage model 213XL*
Rated Airflow:	*2,550 acfm*
Filtration Area / Media:	*443 ft^2*
Filter Bags:	*36 filter bags, each 8' x 5.875"*
Cleaning System:	*Reverse pulse jet*
Exhaust Configuration:	*12" x 16" discharging horizontal at 45' above grade*
Location:	*45°38'12.9"N 122°42'23.6"W*

5.l. *Ore Storage Building (removed).* *One bulk storage building is used to store and transfer bulk copper ore. Fugitive emissions are controlled with enclosure and a dust collector.*

Location:	*45°38'19.7"N 122°42'15.4"W*
SCC Code:	*30510598*

5.m. Equipment/Activity Summary.

ID No.	Equipment/Activity	Control Equipment/Measure
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

6. EMISSIONS DETERMINATION

Emissions to the ambient atmosphere from material handling and storage operations, as proposed in ADP Application CL-3283, consist of particulate matter (PM) and toxic air pollutants (TAPs).

Unless otherwise specified by SWCAA, actual emissions must be determined using the specified input parameter listed for each emission unit and the following hierarchy of methodologies:

(a) Continuous emissions monitoring system (CEMS) data;
(b) Source emissions test data (EPA reference method). When source emissions test data conflicts with CEMS data for the time period of a source test, source test data must be used;
(c) Source emissions test data (other test method); and
(d) Emission factors or methodology provided in this TSD.

6.a. Bulk Material Handling/Storage (*modified*). Potential emissions from general material handling and storage operations are calculated based on maximum proposed material throughput (3,300,000 tpy), emission factors from AP-42 section 13.2.4 for aggregate handling (11/06), and estimated capture/control efficiencies. Calculations assume a worst case material surface moisture of 0.25%. The hourly emission rates presented below represent the operating scenario with the highest short term emission rates (2,000 ton/hr, rail to ship). Annual emissions will be calculated based on actual material throughput using the same methodology.

$$EF = k\ (0.0032)\ [(U/5)^{1.3}] / [(M/2)^{1.4}]\ \text{(lb/ton of material)}$$

Where: k = size multiplier = 0.74 (PM), 0.35 (PM_{10}), 0.053 ($PM_{2.5}$)
U = mean wind speed = 8.5 mph
M = material surface moisture = 0.25% (worst case moisture)

Pollutant	Emission Factor	Control Efficiency	Emissions lb/hr (max)	Emissions tpy
PM	0.08675 lb/ton	98-100%	5.85	12.01
PM_{10}	0.04103 lb/ton	98-100%	3.19	7.56
$PM_{2.5}$	0.00621 lb/ton	98-100%	0.48	1.14

6.b. Emissions Summary/Facility-wide Potential to Emit. Facility-wide potential to emit as calculated in the sections above is summarized below.

Pollutant	Potential Emissions (tpy)	Project Increase (tpy)
NO_X	0.00	0.00
CO	0.00	0.00
VOC	0.00	0.00
SO_2	0.00	0.00
Lead	0.00	0.00
PM	12.01	9.51
PM_{10}	7.56	6.31
$PM_{2.5}$	1.14	0.96
TAP	0.00	0.00
HAP	0.00	0.00
CO_2e	0.00	0.00

7. REGULATIONS AND EMISSION STANDARDS

Regulations that have been used to evaluate the acceptability of the proposed facility and establish emission limits and control requirements include, but are not limited to, the regulations, codes, or requirements listed below.

7.a. Revised Code of Washington (RCW) 70A.15.2040 empowers any activated air pollution control authority to prepare and develop a comprehensive plan or plans for the prevention, abatement and control of air pollution within its jurisdiction. An air pollution control authority may issue such orders as may be necessary to effectuate the purposes of the Washington Clean Air Act and enforce the same by all appropriate administrative and judicial proceedings subject to the rights of appeal as provided in Chapter 62, Laws of 1970 ex. sess.

7.b. RCW 70A.15.2210 provides for the inclusion of conditions of operation as are reasonably necessary to assure the maintenance of compliance with the applicable ordinances, resolutions, rules and regulations when issuing an Air Discharge Permit for installation and establishment of an air contaminant source.

7.c. WAC 173-460 "Controls for New Sources of Toxic Air Pollutants" requires Best Available Control Technology for toxic air pollutants (T-BACT), identification and quantification of emissions of toxic air pollutants and demonstration of protection of human health and safety.

7.d. WAC 173-476 "Ambient Air Quality Standards" establishes ambient air quality standards for PM_{10}, $PM_{2.5}$, lead, sulfur dioxide, nitrogen dioxide, ozone, and carbon monoxide in the ambient air, which shall not be exceeded.

7.e. SWCAA 400-040 "General Standards for Maximum Emissions" requires all new and existing sources and emission units to meet certain performance standards with respect to Reasonably Available Control Technology (RACT), visible emissions, fallout, fugitive emissions, odors, emissions detrimental to persons or property, sulfur dioxide, concealment and masking, and fugitive dust.

7.f. SWCAA 400-050 "Emission Standards for Combustion and Incineration Units" requires that all provisions of SWCAA 400-040 be met and that no person shall cause or permit the emission of particulate matter from any combustion or incineration unit in excess of 0.23 grams per dry cubic meter (0.1 grains per dry standard cubic foot) of exhaust gas at standard conditions.

7.g. SWCAA 400-060 "Emission Standards for General Process Units" prohibits particulate matter emissions from all new and existing process units in excess of 0.1 grains per dry standard cubic foot of exhaust gas.

7.h. SWCAA 400-109 "Air Discharge Permit Applications" requires that an Air Discharge Permit application be submitted for all new installations, modifications, changes, or alterations to process and emission control equipment consistent with the definition of "new source". Sources wishing to modify existing permit terms may submit an Air Discharge Permit application to request such changes. An Air Discharge Permit must be issued, or written confirmation of exempt status must be received, before beginning any actual construction, or implementing any other modification, change, or alteration of existing equipment, processes, or permits.

7.i. SWCAA 400-110 "New Source Review" requires that SWCAA issue an Air Discharge Permit in response to an Air Discharge Permit application prior to establishment of the new source, emission unit, or modification.

7.j. SWCAA 400-111 "Requirements for Sources in a Maintenance Plan Area" requires that no approval to construct or alter an air contaminant source shall be granted unless it is evidenced that:

(1) The equipment or technology is designed and will be installed to operate without causing a violation of the applicable emission standards;
(2) Emissions will be minimized to the extent that the new source will not exceed emission levels or other requirements provided in the maintenance plan;
(3) Best Available Control Technology will be employed for all air contaminants to be emitted by the proposed equipment;
(4) The proposed equipment will not cause any ambient air quality standard to be exceeded; and
(5) If the proposed equipment or facility will emit any toxic air pollutant regulated under WAC 173-460, the proposed equipment and control measures will meet all the requirements of that Chapter.

8. RACT/BACT/BART/LAER/PSD/CAM DETERMINATIONS

The proposed equipment and control systems incorporate Best Available Control Technology (BACT) for the types and amounts of air contaminants emitted by the processes as described below:

New BACT Determinations

8.a. BACT Determination – Bulk Material Handling and Storage. The proposed use of process enclosure and high efficiency filtration has been determined to meet the requirements of BACT for the type and quantity of emissions from bulk material handling and storage operations at this facility.

Previous BACT Determinations

8.b. BACT Determination – Bulk Material Handling and Storage (*ADP 23-3615*). The proposed use of process enclosure and high efficiency filtration has been determined to meet the requirements of BACT for the type and quantity of emissions from bulk material handling and storage operations at this facility.

8.c. BACT Determination – Railcar Receiving Operations (*ADP 17-3233*). The proposed use of process enclosure and high efficiency filtration was previously determined to meet the requirements of BACT for particulate matter emissions from railcar receiving operations at this facility.

Other Determinations

8.d. Prevention of Significant Deterioration (PSD) Applicability Determination. The potential to emit of this facility is less than applicable PSD applicability thresholds. Likewise, this permitting action will not result in a potential increase in emissions equal to or greater than the PSD thresholds. Therefore, PSD review is not applicable to this action.

8.e. Compliance Assurance Monitoring (CAM) Applicability Determination. CAM is not applicable to any emission unit at this facility because it is not a major source and is not required to obtain a Part 70 permit.

9. AMBIENT IMPACT ANALYSIS

9.a. Ambient Impact Analysis – PM_{10} / $PM_{2.5}$. Emissions of PM_{10} and $PM_{2.5}$ were modeled using the AERSCREEN dispersion model. The results of the model indicate that the project will not cause applicable NAAQS to be exceeded.

Emission Area	Pollutant	Modelled Impact ($\mu g/m^3$)	Background Concentration ($\mu g/m^3$)	Combined Impact ($\mu g/m^3$)	NAAQS ($\mu g/m^3$)
Receiving	PM_{10} (24-hr)	79.58	54.7	134.3	150.0
	$PM_{2.5}$ (Annual)	1.98	6.6	8.6	9.0
	$PM_{2.5}$ (24-hr)	11.88	19.7	31.6	35.0
Storage Building	PM_{10} (24-hr)	17.01	54.7	71.7	150.0
	$PM_{2.5}$ (Annual)	0.41	6.6	7.0	9.0
	$PM_{2.5}$ (24-hr)	2.49	19.7	22.2	35.0
Ship Loading	PM_{10} (24-hr)	58.27	54.7	113.0	150.0
	$PM_{2.5}$ (Annual)	1.47	6.6	8.1	9.0
	$PM_{2.5}$ (24-hr)	8.81	19.7	28.5	35.0

9.b. Toxic Air Pollutant Review. The new equipment and modifications proposed in ADP Application CL-3283 will not affect the type or quantity of TAP emissions from bulk material handling and storage operations at this facility.

Conclusions

9.c. Installation of a new soda ash export terminal, as proposed in ADP Application CL-3283, will not cause the ambient air quality requirements of Title 40 Code of Federal Regulations (CFR) Part 50 "National Primary and Secondary Ambient Air Quality Standards" to be violated.

9.d. Installation of a new soda ash export terminal, as proposed in ADP Application CL-3283, will not cause the requirements of WAC 173-460 "Controls for New Sources of Toxic Air Pollutants" or WAC 173-476 "Ambient Air Quality Standards" to be violated.

9.e. Installation of a new soda ash export terminal, as proposed in ADP Application CL-3283, will not cause a violation of emission standards for sources as established under SWCAA General Regulations Sections 400-040 "General Standards for Maximum Emissions," 400-050 "Emission Standards for Combustion and Incineration Units," and 400-060 "Emission Standards for General Process Units."

10. DISCUSSION OF APPROVAL CONDITIONS

SWCAA has made a determination to issue ADP 25-3696 in response to ADP Application CL-3283. ADP 25-3696 contains approval requirements deemed necessary to assure compliance with applicable regulations and emission standards as discussed below.

10.a. Supersession of Previous Permits. ADP 25-3696 supersedes ADP 23-3615 in its entirety.

10.b. General Basis. Permit requirements for equipment affected by this permitting action incorporate the operating schemes proposed by the applicant in ADP Application CL-3283. Permit requirements established by this action are intended to implement BACT, minimize emissions, and assure compliance with applicable requirements on a continuous basis. Emission limits for approved equipment are based on the maximum potential emissions calculated in Section 6 of this Technical Support Document.

10.c. Monitoring and Recordkeeping Requirements. ADP 25-3696 establishes monitoring and recordkeeping requirements sufficient to document compliance with applicable emission limits, ensure proper operation of approved equipment and provide for compliance with generally applicable requirements. Specific monitoring requirements are established for hours of operation and material throughput.

10.d. Reporting Requirements. ADP 25-3696 establishes general reporting requirements for annual air emissions, upset conditions and excess emissions. Specific reporting requirements are established for hours of operation and material throughput. Reports are to be submitted on an annual basis.

10.e. Emission Limits. Particulate matter and visible emissions from dust collectors are limited to levels indicative of proper filtration/operation (0.005 gr/dscf, 0% opacity). Visible emission limits from ship loading vary depending on the loading stage (initial fill, regular operation, topping off). Visible emissions from general material handling operations is limited to 0% opacity consistent with the fully enclosed operating scheme proposed in ADP Application CL-3283.

11. START-UP AND SHUTDOWN/ALTERNATIVE OPERATING SCENARIOS/POLLUTION PREVENTION

11.a. Start-up and Shutdown Provisions. Pursuant to SWCAA 400-081 "Start-up and Shutdown", technology based emission standards and control technology determinations shall take into consideration the physical and operational ability of a source to comply with the applicable standards during start-up or shutdown. Where it is determined that a source is not capable of achieving continuous compliance with an emission standard during start-up or shutdown, SWCAA shall include appropriate emission limitations, operating parameters, or other criteria to regulate performance of the source during start-up or shutdown.

The applicant did not identify any start-up and shutdown periods during which affected equipment is not capable of achieving continuous compliance with applicable technology determinations or approval conditions. To SWCAA's knowledge, this facility can comply with all applicable standards during startup and shutdown.

11.b. Alternate Operating Scenarios. SWCAA conducted a review of alternate operating scenarios applicable to equipment affected by this permitting action. The permittee did not propose or identify any applicable alternate operating scenarios. Therefore, none were included in the permit requirements.

11.c. Pollution Prevention Measures. SWCAA conducted a review of possible pollution prevention measures for the facility. No pollution prevention measures were identified by either the permittee or SWCAA separate from those measures required under BACT considerations. Therefore, none were included in the permit requirements.

12. EMISSION MONITORING AND TESTING

12.a. Emission Testing – DC1. Permit requirements for dust collector DC1 require the permittee to conduct periodic emission testing every 7 years for the purposes of demonstrating compliance with applicable emission limits. All emission testing shall be conducted in accordance with the provisions of ADP 25-3696, Appendix A.

12.b. Emission Testing – DC2. Permit requirements for dust collector DC2 require the permittee to conduct periodic emission testing every 7 years for the purposes of demonstrating compliance with applicable emission limits. All emission testing shall be conducted in accordance with the provisions of ADP 25-3696, Appendix A.

13. FACILITY HISTORY

13.a. Previous Permitting Actions. SWCAA has previously issued the following Permits for this facility:

Permit Number	Application Number	Date	Purpose
23-3615	CL-3253	11/29/2023	Approval to handle and store silver concentrate.
17-3233	CL-3009	6/14/2017	Replacement of the existing rail unloading building and 2 existing baghouses with a new unloading building and 2 new baghouses to accommodate a rail realignment project at the Port of Vancouver.
97-1988	CL-1286	4/3/1997	Installation of new bulk commodity storage building (Ore Building) and associated handling equipment. Superseded by ADP 17-3233.
96-1895R1	CL-1271	1/3/1997	Installation of material handling equipment and emission control baghouses at Port of Vancouver, Terminal 2, Berth 7. Superseded by ADP 17-3233.
96-1895	CL-1137	7/17/1996	Installation of material handling equipment and emission control baghouses at Port of Vancouver, Terminal 2, Berth 7. Superseded by ADP 96-1895R1.

13.b. Compliance History. A search of source records on file at SWCAA did not identify any previous or outstanding compliance issues during the past five (5) years.

14. PUBLIC INVOLVEMENT OPPORTUNITY

14.a. Public Notice for ADP Application CL-3283. Public notice for ADP Application CL-3283 was published on the SWCAA internet website for a minimum of (15) days beginning on December 13, 2024.

14.b. Public/Applicant Comment for ADP Application CL-3283. SWCAA did not receive specific comments, a comment period request or any other inquiry from the public regarding this ADP application. Therefore, no public comment period was provided for this permitting action.

14.c. State Environmental Policy Act. The City of Vancouver issued a Determination of Nonsignificance (DNS LUP-84478) for conversion of the existing copper concentrate/bentonite clay bulk export facility to a soda ash bulk export facility on November 25, 2024.