



September 14, 2022

Mr. Aaron Leach, Director of Manufacturing
Kellogg Supply, Inc.
350 W Sepulveda Blvd.
Carson, CA 90745

Subject: Final Air Discharge Permit for New Soil Blending Facility

Dear Mr. Leach:

A final determination to issue Air Discharge Permit 22-3540 (ADP 22-3540) has been completed for Air Discharge Permit (ADP) Application L-730 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 L-730 was published in the permit section of SWCAA's internet website on August 11, 2022. 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 22-3540 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) at P.O. Box 40903, Olympia, Washington 98504-0903 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 22-3540 and Technical Support Document





SWCAA
Southwest Clean Air Agency

**AIR DISCHARGE PERMIT
22-3540**

Issued: September 14, 2022

Kellogg Supply
207 Kangas Rd, Toledo, WA 98591

SWCAA ID - 2764

REVIEWED BY:

Clinton Lamoreaux
Clinton Lamoreaux, Chief Engineer



APPROVED BY:

Uri Papish
Uri Papish, Executive Director

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1. Equipment/Activity Identification

ID No.	Equipment/Activity	Control Measure/Equipment
1	Bagging Lines 1 and 2	Process Enclosure, Fabric Filtration (Donaldson – 1,800 cfm)
2	Material Handling and Storage	Wet Suppression, Good Management Practices
3	Haul Roads	Wet Suppression

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.

Emission Limits

Req. No.	Emission Limits	Equipment/ Activity ID No.						
1.	<p>Emissions from Bagging Lines 1 and 2 must not exceed the following:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>PM</td><td>0.004 gr/dscf</td></tr><tr><td>PM₁₀</td><td>0.27 tpy</td></tr></table> <p>Annual emissions must be determined from actual hours of operation consistent with the methodology in the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM	0.004 gr/dscf	PM ₁₀	0.27 tpy	1
<u>Pollutant</u>	<u>Emission Limit</u>							
PM	0.004 gr/dscf							
PM ₁₀	0.27 tpy							
2.	<p>Combined emissions from material handling and storage operations must not exceed:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>PM₁₀</td><td>0.90 tpy</td></tr></table> <p>Annual emissions must be determined from actual material throughput consistent with the methodology in the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM ₁₀	0.90 tpy	2		
<u>Pollutant</u>	<u>Emission Limit</u>							
PM ₁₀	0.90 tpy							
3.	<p>Emissions from haul roads operation must not exceed:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>PM₁₀</td><td>0.27 tpy</td></tr></table> <p>Annual emissions must be determined from actual haul road use consistent with the methodology in the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM ₁₀	0.27 tpy	3		
<u>Pollutant</u>	<u>Emission Limit</u>							
PM ₁₀	0.27 tpy							
4.	<p>Visible emissions from approved equipment must not exceed five percent opacity for more than 3 minutes in any one hour period as determined by a Certified Observer certified in accordance with SWCAA Method 9.</p>	1-3						

Operating Limits and Requirements

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
5.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
6.	The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facility-wide
7.	All roads, storage piles, and work areas must be wetted or otherwise maintained so as to effectively prevent particulate matter from becoming airborne.	Facility-wide
8.	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.	1-3
9.	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.	1-3
10.	Exhaust air from approved equipment must be discharged vertically into the ambient air above the level of the building roof. Any device that obstructs or prevents vertical discharge is prohibited.	1

Monitoring and Recordkeeping Requirements

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
11.	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
12.	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.	1-3
13.	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.	1-3
14.	Excess emissions and upset conditions must be recorded for each occurrence.	1-3

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.										
15.	<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 processed</td><td>Recorded monthly</td></tr><tr><td>(b) Hours bagging line baghouse operation</td><td>Recorded monthly</td></tr><tr><td>(c) Number of storage piles in use</td><td>Recorded monthly</td></tr><tr><td>(d) Number of incoming truck loads</td><td>Recorded monthly</td></tr><tr><td>(e) Maintenance and repair activities</td><td>Recorded for each occurrence</td></tr></table>	(a) Quantity of material processed	Recorded monthly	(b) Hours bagging line baghouse operation	Recorded monthly	(c) Number of storage piles in use	Recorded monthly	(d) Number of incoming truck loads	Recorded monthly	(e) Maintenance and repair activities	Recorded for each occurrence	1-3
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(e) Maintenance and repair activities	Recorded for each occurrence											

Emission Monitoring and Testing Requirements

There are no emission monitoring or testing requirements for the approved equipment cited in this ADP.

Reporting Requirements

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
16.	<p>All air quality related complaints received by the permittee must be reported to SWCAA within three days of receipt. Complaint reports shall 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
17.	<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. 	1-3
18.	Initial start-ups of SWCAA approved emission units must be reported to SWCAA via letter within 10 days	1-3
19.	<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 processed; (b) Hours of bagging line baghouse operation; (c) Number of storage piles in use; (d) Number of incoming truck loads; and (e) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs). 	1-3

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.