SWCAA
Southwest Clean Air Agency

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December 14, 2022

Ms. Lisa Hendriksen, Director of Planning and Environmental
Port of Longview
10 International Way
Longview, WA 98632

Subject: Final Air Discharge Permit for Modification of Berth 5 Permit Terms

Dear Ms. Hendriksen:

A final determination to issue Air Discharge Permit 22-3555 (ADP 22-3555) has been completed for Air Discharge Permit (ADP) Application CO-1060 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-1060 was published in the permit section of SWCAA's internet website on October 28, 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 22-3555 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 22-3555 and Technical Support Document

SWCAA
Southwest Clean Air Agency

AIR DISCHARGE PERMIT
22-3555

Issued: December 14, 2022

Port of Longview
10 International Way, Longview, WA 98632

SWCAA ID - 778

REVIEWED BY: _____
Clinton Lamoreaux, Chief Engineer

APPROVED BY: _____
Uri Papish, Executive Director

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Appendix A Emission Testing Requirements
Material Handling Dust Collectors

1. Equipment/Activity Identification

ID No.	Equipment/Activity	Control Measure/Equipment
1	Berth 5 Railcar Receiving Pit-Elevator-Conveyors C1-C3 Reclaim Conveyors C29/C42, Conveyor C32, Disposal Tank to Truck/Rail	Process Enclosure Fabric Filtration (B5-BH-1)
2	Berth 5 Reclaim Tunnels T-1/T-2, Conveyors C4/C5	Process Enclosure Fabric Filtration (B5-BH-2)
3	Berth 5 Conveyor C30, Ship Loader (Conveyor C31)	Process Enclosure Fabric Filtration (B5-BH-3)
4	Berth 5 Conveyors C32/C33	Process Enclosure Fabric Filtration (B5-BH-5)
5	Berth 5 Storage Tanks (T-1 to T-5, Disposal Storage Tank)	Process Enclosure Fabric Filtration (B5-BV-1 thru B5-BV-6)
6	Berth 7 Receiving Hopper / Conveyors C1, C2, C3	Process Enclosure Fabric Filtration (B7-BH-4)
7	Warehouse 20 Abrasive Blasting Shop	Process Enclosure Fabric Filtration (WH20C-BV-1)
8	Warehouse 10	Process Enclosure Fabric Filtration (WH10-BH-1)
9	Portable Operations	Process Enclosure Fabric Filtration (P1-BH-6)
10	Portable Operations	Process Enclosure Fabric Filtration (P1-BH-2)
11	Portable Operations	Process Enclosure Fabric Filtration (P1-BH-3)
12	Portable Operations	Process Enclosure Fabric Filtration (P1-BH-4)
13	Portable Operations	Process Enclosure Fabric Filtration (P1-BH-5)
14	Berth 5 Ship Loading Fugitive Emissions	Process Enclosure
15	Haul Road Fugitive Emissions	Sweeping, 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.

ADP 22-3555 supersedes ADP 20-3431 in its entirety.

Emission Limits

Req. No.	Emission Limits	Equipment/ Activity ID No.
1.	Emissions from general bulk commodity storage and handling operations must not exceed the following Pollutant — Emission Limit PM_{10} — 17.67 tpy Emissions must be calculated based on actual material throughput and vehicle mileage consistent with the methodology in Section 6 of the Technical Support Document for this permit.	1-7, 9-15
2.	Emissions from Dust Collector WH10-BH-1 must not exceed the following: Pollutant — Emission Limit PM_{10} (filterable) — 20.65 tpy PM (filterable) — 0.005 gr/dscf (1-hr avg) Emissions must be calculated based on actual hours of operation, rated airflow of the unit and the most recent emission test data consistent with the methodology in Section 6 of the Technical Support Document for this permit.	8
3.	Dust collector exhaust concentration of particulate matter must not exceed 0.005 gr/dscf (1-hr avg). 0% opacity may serve as a surrogate for compliance for these units.	1-4, 6-7, 9-11
4.	Dust collector exhaust concentration of particulate matter must not exceed 0.005 gr/dscf (1-hr avg).	12-13
5.	Visible emissions must not exceed the following for more than 3 minutes in any one-hour period as determined in accordance with SWCAA Method 9 "Visible Opacity Determination Method" (SWCAA 400 Appendix A): (1) Petroleum coke storage and handling — 0% opacity (2) Petroleum coke ship loading during "topping off" — 20% opacity (3) General storage and handling — 5% opacity (4) General truck loading and unloading — 5% opacity (5) General ship loading other than "topping off" — 5% opacity (6) General ship loading during "topping off" — 20% opacity (7) Dust collector exhaust — 0% opacity "Topping off" is defined as the period during which the last 5% of ship hold volume is loaded.	1-14

Operating Limits and Requirements

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
6.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
7.	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.
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.	1-15
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.	1-15
10.	Railcar loading and unloading must be conducted with reviewed and approved bulk commodity handling and emissions control equipment.	1, 9-13
11.	Truck loading and unloading must be conducted with reviewed and approved bulk commodity handling and emissions control equipment.	9-13
12.	Differential pressure gauges must be installed and/or maintained on each dust collector listed in this Permit.	1-4, 6-13
13.	Wind speed during ship loading must be monitored continuously during ship loading at Berth 5. Ship loading operations must be curtailed if sustained wind speed exceeds 35 miles per hour.	14
14.	Exhaust air from approved equipment must be discharged vertically into the ambient air. Any device that obstructs or prevents vertical discharge is prohibited.	7-8, 12-13

Monitoring and Recordkeeping Requirements

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
15.	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
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.	1-15
17.	All records required by this Permit must be kept for a minimum period of no less than five years and must be maintained in a form readily available for inspection by SWCAA representatives.	1-15
18.	Excess emissions and upset conditions must be recorded for each occurrence.	1-15

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
19.	The permittee must record the following information: (a) Hours of operation for WH10-BH-1 — Recorded monthly (b) Type and quantity of bulk commodity and log yard throughput — Recorded quarterly (c) Vehicle miles traveled by facility trucks and material transports — Recorded quarterly (d) Material moisture content — Recorded for each commodity (e) Average wind speed during ship loading at Berth 5 — Recorded for each occurrence (f) Control equipment maintenance and repair — Recorded for each occurrence (g) Filter bag replacements — Recorded for each occurrence (h) Opacity training and certification activities — Recorded for each occurrence	1-15

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 Baghouse P1-BH-4, Baghouse P1-BH-5 and Dust Collector WH10-BH-1 as described in Appendix A of this Permit.	8, 12-13

Reporting Requirements

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
21.	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
22.	Excess emissions must be reported to SWCAA as follows: (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(1); and (c) No later than 30 days after the end of the month of discovery for all other excess emissions.	1-15
23.	An annual emissions inventory report must be submitted in accordance with SWCAA 400-105(1). In addition to the emissions information required under SWCAA 400-105(1), each annual report must include an estimate of annual emission quantities for each TAP compound listed in the Technical Support Document for this Permit.	1-15

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
24.	The permittee must report the following information to SWCAA no later than March 15th for the previous calendar year: (a) Hours of operation for WH10-BH-1; (b) Type and quantity of bulk commodity and log yard throughput; (c) Vehicle miles traveled by facility trucks and material transports; (d) Material moisture content for each commodity handled; (e) Average wind speed during each ship loading operation at Berth 5; and (f) Calculated air emissions.	1-15
25.	The permittee must notify SWCAA at least seven days in advance of the use of any new material, which results in the emission of toxic or hazardous air pollutants not previously emitted. In response to the notification, SWCAA may require that a written report be submitted with the following: (a) A description of the proposed change(s) in materials with an SDS for each new material, (b) The date the change(s) is (are) to be made, (c) The change(s) in emissions of VOCs, HAPs and TAPs occurring as a result of the change, and (d) A summary of any applicable requirement(s) that would apply as a result of the change(s). If the proposed emission rate of a new TAP exceeds the applicable SQER and/or other emission limits established by this Permit or otherwise circumvents an applicable requirement, New Source Review may be required prior to making the proposed change.	1-15
26.	Emission test results must be reported to SWCAA in writing within 45 days of test completion.	8, 12-13

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.

Req. No.	General Provisions
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.

Emission Testing Requirements
Material Handling Dust Collectors

1. Introduction:

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

2. Testing Requirements:

a. **Testing Schedule.** Initial emission testing of each dust collector must be conducted no later than 90 calendar days after commencing regular operation. Subsequent emission testing of each dust collector must be performed on a continuing 5-year cycle, no later than the end of October of the year in which testing is due. An alternate testing schedule may be implemented if approved in writing by SWCAA in advance of regularly scheduled testing. Emission testing conducted more than three months prior to a scheduled due date will not satisfy the periodic source emission testing requirement unless prior written approval is obtained from SWCAA.

b. **Test Plan.** A comprehensive test plan must be submitted to SWCAA for review and approval at least 10 business days prior to each test. SWCAA personnel must be informed at least five business days prior to testing so that a representative may be present during testing.

c. **Test Location.** Sampling must be conducted at the dust collector exhaust stack for each constituent listed below.

d. **Test Runs/Reference Test Methods.** A minimum of three (3) test runs must be for each constituent listed below to ensure the data are representative. Compliance must be demonstrated by averaging the results of the individual sampling runs. The sampling methods identified below must be used unless alternate methods are approved in writing by SWCAA in advance of the scheduled testing.

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

* If visible emissions are observed during any 6 minute test run, the affected test run must be extended to a length of 60 minutes.

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. Recorded parameters must, at a minimum, include the type of material handled, rate of material transfer and process startups and shutdowns.

Emission Testing Requirements
Material Handling Dust Collectors

4. Reporting Requirements:

a. **Test Report.** A final emission test report must be prepared and submitted to SWCAA within 45 calendar days of test completion. Unless otherwise directed by SWCAA, test reports must be provided in hard copy (paper) and an electronic format acceptable to SWCAA. Each test report must include, at a minimum, 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) Time and date of the test and identification and qualifications of the personnel involved, including SWCAA personnel who observed the testing,
(3) Summary of results, reported in units and averaging periods consistent with the applicable emissions standard or unit,
(4) Summary of control system or equipment operating conditions,
(5) Summary of production related parameters cited in Section 3 above,
(6) A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation,
(7) A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation,
(8) Copies of field data and example calculations,
(9) Chain of custody information,
(10) Calibration documentation,
(11) Discussion of any abnormalities associated with the results, and
(12) A statement signed by the senior management official of the testing firm certifying the validity of the source test report.

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.