

November 20, 2023

Mr. Matthew Kerrigan, Operations Manager  
EGT, LLC  
150 East Mill Road  
Longview, WA 98632

Subject: Final Air Discharge Permit for New Storage Silos and Grain Handling Equipment and Modification of Existing Grain Handling Equipment

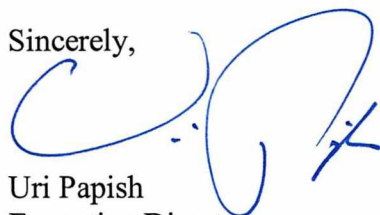
Dear Mr. Kerrigan:

The public comment period for the preliminary determination to issue Air Discharge Permit 23-3607 (ADP 23-3607) in response to ADP Application CO-1075 concluded on November 12, 2023. The Southwest Clean Air Agency (SWCAA) did not receive any adverse comments from the public relative to the preliminary determination. Therefore, a final determination to issue ADP 23-3607 has been made pursuant to Section 400-110(4) of SWCAA's General Regulations for Air Pollution Sources. Electronic copies of ADP 23-3607 and the associated Technical Support Document are available for public review in the permit section of SWCAA's internet home page (<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 23-3607 and Technical Support Document

Cc: Air Permits and Toxics Branch  
U.S. EPA Region 10, Mail Stop 15-H13  
1200 Sixth Avenue, Suite 155  
Seattle, WA 98101






**AIR DISCHARGE PERMIT  
23-3607**

**Issued: November 20, 2023**

EGT, LLC  
150 E. Mill Road, Longview, WA 98632

SWCAA ID - 2292

REVIEWED BY:

  
Clinton Lamoreaux, Chief Engineer



APPROVED BY:

  
Uri Papish, Executive Director

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**1. Equipment/Activity Identification**

<b>ID No.</b>	<b>Facility ID</b>	<b>Equipment/Activity</b>	<b>Control Equipment/Measure</b>
<b>Grain Receiving</b>			
1	EP01	Rail Receiving Pit H101 and Receiving Conveyor BC12 & Rail Scale Receiving Conveyor BC14	Enclosure, Aspirated Pit, Choke Unload Pit, and Baghouse F1040
2	EP02	Rail Receiving Pits H102 and H103 and Receiving Conveyors BC11 & BC13 and Rail Scale Receiving Conveyor BC15	Enclosure, Aspirated Pit, Choke Unload Pit, and Baghouse F1050
3	EP01A	Rail Receiving Pit H101, H102 and H103 Fugitive Emissions	None
4	EP109	Rail Scale Receiving Conveyor BC14	Filter F1430
118	EP120	Rail Scale Receiving Conveyor BC14	Filter F1450
5	EP110	Rail Scale Receiving Conveyor BC15	Filter F1530
119	EP121	Rail Scale Receiving Conveyor BC15	Filter F1550
6	EP05	Rail Scale Receiving Conveyor BC16	Filter F1620
120	EP122	Rail Scale Receiving Conveyor BC16	Filter F1623
7	EP06	Rail Scale Receiving Conveyor BC16	Filter F1625
8	EP111	Rail Scale Receiving Conveyor BC16	Filter F1630
9	EP07	Rail Scale Receiving Conveyor BC16	Filter F1635
10	EP09	Rail Scale Receiving Conveyor BC17	Filter F1720
121	EP123	Rail Scale Receiving Conveyor BC17	Filter F1723
11	EP10	Rail Scale Receiving Conveyor BC17	Filter F1725
12	EP112	Rail Scale Receiving Conveyor BC17	Filter F1730
13	EP11	Rail Scale Receiving Conveyor BC17	Filter F1735
14	EP13	Rail Receiving Scale BW201	Filter F2011
15	EP113	Rail Receiving Scale BW201	Filter F2012
16	EP14	Rail Receiving Scale BW202	Filter F2021
17	EP114	Rail Receiving Scale BW202	Filter F2022
18	EP15	Barge Receiving Bucket Elevator BE40	Filter F4010
19	EP15A	Barge Receiving Bucket Elevator BE40 Fugitive Emissions	None
20	EP16	Barge Receiving Conveyor BC41	Filter F4110
21	EP17	Barge Receiving Conveyor BC41	Filter F4115
22	EP18	Barge Receiving Conveyor BC41	Filter F4118
23	EP19	Barge Receiving Scale BW430	Filter F4310

24	EP115	Barge Receiving Scale BW430	Filter F4311
<b>Grain Handling and Storage</b>			
25	EP20	Annex Fill Conveyor BC18	Filter F1820
26	EP21	Annex Fill Conveyor BC18	Filter F1821
27	EP22	Annex Fill Conveyor BC18	Filter F1822
28	EP23	Annex Fill Conveyor BC18	Filter F1823
29	EP25	Annex Fill Conveyor BC19	Filter F1920
30	EP26	Annex Fill Conveyor BC19	Filter F1921
31	EP27	Annex Fill Conveyor BC19	Filter F1922
32	EP28	Annex Fill Conveyor BC19	Filter F1923
33	EP30	Annex North Shuttle Conveyor BC21	Filter F2110
34	EP31	Annex North Shuttle Conveyor BC21	Filter F2111
35	EP32	Annex North Shuttle Conveyor BC21	Filter F2112
36	EP33	Annex North Shuttle Conveyor BC21	Filter F2113
37	EP34	Annex North Shuttle Conveyor BC21	Filter F2114
38	EP35	Annex North Shuttle Conveyor BC21	Filter F2115
39	EP36	Annex North Shuttle Conveyor BC21	Filter F2116
40	EP37	Annex North Shuttle Conveyor BC21	Filter F2117
41	EP38	Annex North Shuttle Conveyor BC21	Filter F2118
42	EP39	Annex North Shuttle Conveyor BC21	Filter F2119
43	EP40	Annex North Shuttle Conveyor BC21	Filter F2120
44	EP42	Annex South Shuttle Conveyor BC23	Filter F2310
45	EP43	Annex South Shuttle Conveyor BC23	Filter F2311
46	EP44	Annex South Shuttle Conveyor BC23	Filter F2312
47	EP45	Annex South Shuttle Conveyor BC23	Filter F2313
48	EP46	Annex South Shuttle Conveyor BC23	Filter F2314
49	EP47	Annex South Shuttle Conveyor BC23	Filter F2315
50	EP48	Annex South Shuttle Conveyor BC23	Filter F2316
51	EP49	Annex South Shuttle Conveyor BC23	Filter F2317
52	EP50	Annex South Shuttle Conveyor BC23	Filter F2318
53	EP51	Annex South Shuttle Conveyor BC23	Filter F2319
54	EP52	Annex South Shuttle Conveyor BC23	Filter F2320
56	EP55	Annex North Reclaim Conveyor BC31	Filter F3110
57	EP56	Annex North Reclaim Conveyor BC31	Filter F3115
122	EP137	Annex North Reclaim Conveyor BC31	Filter F3120

58	EP57	Annex Center Reclaim Conveyor BC32	Filter F3210
59	EP58	Annex Center Reclaim Conveyor BC32	Filter F3215
123	EP136	Annex Center Reclaim Conveyor BC32	Filter F3220
60	EP59	Annex South Reclaim Conveyor BC33	Filter F3310
61	EP60	Annex South Reclaim Conveyor BC33	Filter F3315
124	EP134	Annex South Reclaim Conveyor BC33	Filter F3320
62	EP117	West Storage System – 12 silos Fugitive Emissions	None
125	EP135	West Storage Intervent System	Filter F20210
63	EP118	Center Storage System – 12 Silos Fugitive Emissions	None
64	EP119	East Storage System – 12 Silos Fugitive Emissions	None
126	EP127	East Storage Intervent System	Filter F20202
65	EP84	Storage Bin 106	Filter F35106
66	EP85	Shipping Bin 107	Filter F35107
67	EP86	Shipping Bin 207	Filter F35207
68	EP87	Shipping Bin 208	Filter F35208
69	EP88	Shipping Bin 306	Filter F35306
70	EP89	Shipping Bin 307	Filter F35307
130	EP132	Recirculation Bucket Elevator BE44	Filter F4410
131	EP133	Recirculation Bucket Elevator BE44	Filter F4415
132	EP131	Annex Fill Conveyor BC24	Filter F2410
133	EP128	Annex Storage Silo 401	Filter F40401
134	EP129	Annex Storage Silo 402	Filter F40402
135	EP130	Annex Storage Silo 403	Filter F40403
<b>Grain Cleaning and Screening</b>			
71	EP61	Grain Cleaning System	Baghouse F8701
72	EP62	Screenings Bucket Elevator BE81	Filter F8105
73	EP63	Screenings Bin DB801	Filter F801, unpowered
74	EP64	Screenings Bin DB802	Filter F802, unpowered
75	EP65	Screenings Bin DB803	Filter F803, unpowered
76	EP66	Screenings Bin DB804	Filter F804, unpowered
77	EP67	Screenings Loadout Roof Vent #1	Enclosure and Filter F8405
78	EP68	Screenings Loadout Roof Vent #2	Enclosure and Filter F8406
79	EP69	Screenings Loadout Roof Vent #3	Enclosure and Filter F8407

80	EP70	Clean Grain Conveyor BC22	Filter F2209
81	EP71	Clean Grain Conveyor BC22	Filter F2210
<b>Grain Shipping and Loadout</b>			
82	EP72	Shipping Scale Conveyor BC34	Filter F3420
83	EP73	Shipping Scale Conveyor BC34	Filter F3421
84	EP74	Shipping Scale Conveyor BC34	Filter F3422
85	EP75	Shipping Scale Conveyor BC34	Filter F3423
127	EP124	Shipping Scale Conveyor BC34	Filter F3424
86	EP77	Shipping Scale Conveyor BC34	Filter F3425
87	EP78	Shipping Scale BW203	Filter F2031
88	EP116	Shipping Scale BW203	Filter F2032
89	EP79	Shipping Bin Fill Conveyor BC35	Filter F3520
90	EP80	Shipping Bin Fill Conveyor BC35	Filter F3521
91	EP81	Shipping Bin Fill Conveyor BC35	Filter F3522
92	EP82	Shipping Bin Fill Conveyor BC35	Filter F3523
93	EP83	Shipping Bin Fill Conveyor BC35	Filter F3525
94	EP90	Shipping Bin Reclaim Conveyor BC51	Filter F5110
95	EP91	Shipping Bin Reclaim Conveyor BC52	Filter F5210
96	EP92	West Long Shipping Conveyor BC53	Filter F5320
97	EP93	West Long Shipping Conveyor BC53	Filter F5325
128	EP125	West Long Shipping Conveyor BC53	Filter F5327
98	EP94	West Long Shipping Conveyor BC53	Filter F5330
99	EP95	East Long Shipping Conveyor BC54	Filter F5420
100	EP96	East Long Shipping Conveyor BC54	Filter F5425
129	EP126	East Long Shipping Conveyor BC54	Filter F5427
101	EP97	East Long Shipping Conveyor BC54	Filter F5430
102	EP98	West Shipping Conveyor BC55	Filter F5510
103	EP99	East Shipping Conveyor BC56	Filter F5610
104	EP100	East Ship Loader Conveyor BC61	Filter F6110
105	EP101	East Ship Loader Conveyor BC61	Filter F6115
106	EP102	East Ship Loader Spout TSP61	Filter F6130
107	EP102A	East Ship Loader Spout TSP61 Fugitive Emissions	None
108	EP103	Center Ship Loader Conveyor BC62	Filter F6210
109	EP104	Center Ship Loader Conveyor BC62	Filter F6215
110	EP105	Center Ship Loader Spout TSP62	Filter F6230

111	EP105A	Center Ship Loader Spout TSP62 Fugitive Emissions	None
112	EP106	West Ship Loader Conveyor BC63	Filter F6310
113	EP107	West Ship Loader Conveyor BC63	Filter F6315
114	EP108	West Ship Loader Spout TSP63	Filter F6330
115	EP108A	West Ship Loader Spout TSP63 Fugitive Emissions	None
116	N/A	Paved Haul Roads/Paved Surfaces	None
<b>Screenings Transfer</b>			
117	EP61A	Dust Transfer System	Filter F8715

## 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 23-3607 supersedes ADP 19-3320 in its entirety.

### Emission Limits

Req. No.	Emission Limits	Equipment/ Activity ID No.								
1.	<p>Combined emissions from the facility must not exceed any of the following:</p> <table><tr><th><u>Pollutant</u></th><th><u>Emission Limit</u></th></tr><tr><td>PM</td><td>84.83 tpy</td></tr><tr><td>PM<sub>10</sub></td><td>61.91 tpy</td></tr><tr><td>PM<sub>2.5</sub></td><td>10.41 tpy</td></tr></table> <p>Emissions must be calculated based upon the methodology outlined in Section 6 of the Technical Support Document for this ADP. Compliance must be determined by summing total emissions for successive 12 consecutive month periods rolled in monthly increments.</p> <p>For the purposes of determining compliance with the above, if during ship loading, the visible emissions exceeds any opacity limit, the control efficiency used in calculating emissions from ship loading for that loading operation must be reduced to one-third (1/3) its normal value from the date of the excess emissions until the date compliance with the opacity limit is again demonstrated.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM	84.83 tpy	PM <sub>10</sub>	61.91 tpy	PM <sub>2.5</sub>	10.41 tpy	1-135
<u>Pollutant</u>	<u>Emission Limit</u>									
PM	84.83 tpy									
PM <sub>10</sub>	61.91 tpy									
PM <sub>2.5</sub>	10.41 tpy									



<b>Req. No.</b>	<b>Emission Limits</b>	<b>Equipment/ Activity ID No.</b>
2.	Exhaust PM concentration from baghouses and cartridge filters must not exceed 0.0020 gr/dscf (1-hr avg) as determined by methods specified in Appendix A.	1-2, 4-18, 20-61, 65-72, 77-106, 108-110, 112-114, 117-135
3.	Visible emissions from all baghouse exhausts, cartridge filter exhausts, railcar unloading, and any fugitive release points from internal grain handling not elsewhere described, must not exceed 0% opacity for more than 3 minutes in any 1-hour period determined by EPA Method 9 and SWCAA Method 9.	1-18, 20-76, 80-106, 108-110, 112-114, 117-135
4.	<p>Visible emissions from barge unloading must not exceed any of the following for more than 3 minutes in any 1-hour period, as determined in accordance with EPA Method 9 and SWCAA Method 9:</p> <p>Initial "Dig-in" ..... 20% opacity  Regular Operation ..... 0% opacity</p> <p>Initial "dig-in" is defined as the first 10 minutes of barge unloading when the head of the marine leg burrows into the unloading sump of the barge.</p>	19
5.	Visible emissions from screenings loadout to truck must not exceed 0% opacity for more than 3 minutes in any 1-hour period as determined by SWCAA Method 9.	77-79
6.	<p>Visible emissions from ship loading must not exceed any of the following in any 1-hour period, as determined in accordance with EPA Method 9 and SWCAA Method 9:</p> <p>Initial Fill ..... 20% opacity  Mid-Hold Fill ..... 10% opacity  Topping-Off ..... 20% opacity  Cement Hole Fill ..... 20% opacity</p> <p>Initial fill is defined as the period from initial grain loading to the point where a sufficient pile of grain is present for the dead box to operate properly. This period must not exceed 10% of ship hold volume. Mid-hold fill is defined as the period from initial fill until topping-off. Topping-off is defined as the period during which the last 5% of ship hold volume is loaded. Cement hole fill is defined as any time period during which grain is being loaded through a cement hole with the main hold hatch closed.</p>	107, 111, 115

#### Operating Limits and Requirements

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

<b>Req. No.</b>	<b>Operating Limits and Requirements</b>	<b>Equipment/ Activity ID No.</b>
8.	The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facility-wide
9.	Each pollution control device/measure must be operated whenever the processing equipment served by that air pollution control device is in operation. Control devices must be operated and maintained in accordance with the manufacturer's specifications. Furthermore, air pollution control devices must be operated in a manner that minimizes emissions.	1-2, 4-18, 20-61, 65-106, 108-110, 112-114, 117-135
10.	Emission units identified in this Permit must be maintained and operated in total and continuous conformity with the conditions identified in this ADP. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this ADP, including directing the facility to cease operations until corrective action can be completed.	1-2, 4-18, 20-61, 65-106, 108-110, 112-114, 117-135
11.	Only corn, soybeans, wheat, barley, rapeseed, canola, meals, and dried distiller's grains (DDG) must be received by railcar or barge, processed, and loaded to ship by the facility. For purposes of determining compliance with this ADP all of these commodities must be considered to be "grain."	1-115, 118-135
12.	The entrance and exit openings of the railcar unloading shed must have a vertical clearance less than or equal to 18 feet above the rails and a horizontal opening width less than or equal to 17 feet whenever grain is being received.	1-3
13.	Fixed or flexible curtain walls used to minimize the openings of the railcar unloading shed must be inspected at least once per calendar month. A log must be kept noting the results of the inspection and whether there are any damaged, broken, or missing parts. Damaged, broken, or missing parts must be repaired or replaced within 3 days. The date of each repair and/or replacement must be recorded in the inspection log.	1-3
14.	Railcar unloading of grain must not exceed 86,400 tons per calendar day.	1-3
15.	Railcar unloading into any rail receiving pit must only be performed when both rail receiving pit baghouses F1040 and F1050 are in operation. Pit aspiration must be applied during the entire unloading process.	1-3
16.	Rollup doors on the rail receiving shed must be closed whenever a train car is not on the associated track.	1-3
17.	Whenever there is a potential for fugitive emissions to be produced during times when grain is not being delivered to the rail receiving pits, good housekeeping procedures must be used to minimize fugitive emissions. Procedures must include, at a minimum, keeping all the doors and vents to the rail receiving building closed and operating baghouses F1040 and F1050.	1-3
18.	Barge unloading of grain must not exceed 28,800 tons per calendar day.	18-19

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
19.	<p>Barge unloading of grain must only be performed when all of the following requirements are met:</p> <ul style="list-style-type: none"> <li>a. The marine leg is enclosed from the boot pulley centerline to the top of the leg;</li> <li>b. The discharge of the marine leg to the telescoping spout discharging to the belt conveyor is hard flanged and totally enclosed;</li> <li>c. The sections of the telescoping spout to the totally enclosed belt conveyor are gasketed;</li> <li>d. A minimum of 5,000 actual cubic feet per minute aspiration is provided to the marine leg during all barge unloading;</li> <li>e. The marine leg, marine leg discharge, telescoping spouting and spouting discharge to the enclosed belt conveyor does not discharge to the atmosphere visible emissions greater than 0% opacity as determined by EPA reference Method 9 and procedures in 40 CFR 60.11; and</li> <li>f. The emissions of the barge unloading sump do not exceed 20% opacity during the first 3 minutes of unloading and do not exceed 0% opacity thereafter during unloading as determined by EPA reference Method 9 and procedures in 40 CFR 60.11.</li> </ul>	18-19
20.	Barge hatches must be kept closed during unloading operations except when in active use for marine leg access or inspection.	18-19
21.	The headspace of the storage silos must be vented to the Annex North BC21 & South BC23 Shuttle Conveyor (air belt conveyors) or to the bin vent filters in such a manner that the breathing and filling losses from the silos are controlled by the filters.	33-55, 65-70
22.	Whenever the conveyors are in operation, the associated baghouse or filter must be operated and the conveyors and drop points must be completely enclosed, except for the unenclosed area of the individual intermediate gravity belt take-ups for conveyors BC14, BC15, BC16, BC17, BC18, BC19, BC21, BC22, BC23, BC34, BC35, BC41, BC53 & BC54. Belt take-up openings must be minimized to reduce functional impact on associated dust collection systems.	1-2, 4-13, 20-22, 25-61, 80-86, 89-106, 108-109, 112-113, 118-121, 127-129
23.	A differential pressure gage must be installed and maintained operable to continuously monitor the pressure drop across each baghouse and powered filter. Each differential pressure gage or pressure display must be located in an easily accessible location to facilitate operational monitoring.	1-2, 4-18, 20-61, 65-106, 108-110, 112-114, 117-135
24.	A sufficient number of replacement bags and cartridges for the baghouses and filters must be maintained and available on-site to make bag and cartridge replacement as prompt as possible.	1-2, 4-18, 20-61, 65-106, 108-110, 112-114, 117-135
25.	Except as approved specifically by SWCAA, the exhaust point or stack for each emission unit must discharge vertically above the roof level of the building or enclosure in which the emission unit is housed. Any device that obstructs or prevents vertical discharge is prohibited. Except for the screenings loadout roof vents #1, #2, and #3, each stack must have sufficient undisturbed length to meet the requirements of 40 CFR 60 Appendix A Method 1 (e.g., 2.5 diameters upstream and 0.5 diameters downstream).	1-2, 4-18, 20-61, 65-105, 108-109, 112-113, 117-135

<b>Req. No.</b>	<b>Operating Limits and Requirements</b>	<b>Equipment/ Activity ID No.</b>
26.	If SWCAA documents an opacity limit violation, the Permittee must take immediate corrective action. SWCAA may require the Permittee to perform source emission testing to demonstrate that emissions do not exceed the permitted emission limits after performance of corrective action.	1-115, 117-135
27.	Ship loading of grain must not exceed 84,000 tons per calendar day.	106-107, 110-111, 114-115
28.	While loading grain into any ship, ship loader spout operators must use proper dust preventive procedures. Such procedures must include the following, as a minimum: <ul style="list-style-type: none"> <li>a. The ship loader spouts must be installed, operated, maintained, and serviced in accordance with manufacturer's operating instructions and maintenance and service manuals;</li> <li>b. The ship loader spouts must be operated so that the lower spout discharge system is either fully extended or in contact with the ship's hold or the grain at all times except topping off;</li> <li>c. Grain must not be loaded unless the ship loader spout dust filters are in operation;</li> <li>d. The ship loader spouts must be frequently moved within the hold so that tall piles do not develop;</li> <li>e. The ship loader spouts must not be lifted above the pile while grain is being loaded (kept just above the pile during topping off); and</li> <li>f. Any deviation from normal ship loader spout operation (e.g., overriding automatic spout lift control) that results in fugitive emissions in excess of an applicable visible emission standard from the ship's hold must be recorded in the operation log.</li> </ul>	106-107, 110-111, 114-115
29.	Loading of any grain by the ship loader spouts into the wing tanks of ships is prohibited.	106-107, 110-111, 114-115
30.	All frequently used process and road areas must be paved to minimize fugitive dust formation. Paved areas with vehicle traffic must be swept or washed as necessary to prevent excess fugitive emissions.	116
31.	The Permittee must provide emission testing facilities as required under 40 CFR 60.8(e) such as: <ul style="list-style-type: none"> <li>a. Sampling ports adequate for applicable test methods;</li> <li>b. Safe sampling platform(s);</li> <li>c. Safe access to sampling platform(s); and</li> <li>d. Utilities for sampling and testing equipment.</li> </ul>	1-2, 4-18, 20-61, 65-106, 108-110, 112-114, 117-135

<b>Req. No.</b>	<b>Operating Limits and Requirements</b>	<b>Equipment/ Activity ID No.</b>
32.	<p>Screenings loadout must be conducted according to the following:</p> <ul style="list-style-type: none"> <li>a. Roof vents #1, #2, and #3 must be in operation and the rollup doors must be closed at all times during which:               <ul style="list-style-type: none"> <li>(1) A loadout truck is parked in the building and screenings are being delivered to the truck; or</li> <li>(2) The loadout hood filters are going through a cleaning cycle;</li> </ul> </li> <li>b. After the loadout truck is parked and ready to begin the screenings loadout operation, the screenings loadout hood must be lowered onto the truck and checked for gaps;</li> <li>c. Screenings loadout hood filters F8405, F8406, and F8407 must be operated while performing screenings loadout;</li> <li>d. While performing a screenings loadout operation, the loadout screw conveyors must not be operated unless:               <ul style="list-style-type: none"> <li>(1) The screening loadout hood has been lowered onto the loadout truck;</li> <li>(2) The screening loadout hood has been checked for gaps;</li> <li>(3) The screenings loadout hood filters are operating; and</li> <li>(4) Roof vents #1, #2, and #3 are operating; and</li> </ul> </li> <li>e. The filter cleaning cycle must only be performed when the loadout hood is lowered onto the loadout truck and has been checked for gaps and roof vents #1, #2, and #3 are operating.</li> </ul>	77-79

#### **Monitoring and Recordkeeping Requirements**

<b>Req. No.</b>	<b>Monitoring and Recordkeeping Requirements</b>	<b>Equipment/ Activity ID No.</b>
33.	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
34.	With the exception of data logged by a computerized data acquisition system, each record required by this ADP must include the date, time, and name of the person making the record entry. If a control device or process is not operating during a specific inspection or time period, a record must be made to that effect.	Facility-wide
35.	All records required by this ADP must be kept for a minimum period of no less than five (5) years and must be maintained in a form readily available for inspection by SWCAA representatives.	Facility-wide
36.	Excess emissions and upset conditions must be recorded for each occurrence.	1-135

<b>Req. No.</b>	<b>Monitoring and Recordkeeping Requirements</b>	<b>Equipment/ Activity ID No.</b>
37.	The following information concerning the facility must be collected, recorded at the intervals specified below, and readily available on-site for inspection: <ol style="list-style-type: none"> <li>Type and quantity of grain received by rail and by barge recorded on a daily and monthly basis;</li> <li>Type and quantity of grain loaded to ship recorded on a daily and monthly basis;</li> <li>Quantity of screenings material and/or dust loaded out to trucks recorded on a monthly basis; and</li> <li>Monthly emissions of PM, PM<sub>10</sub>, and PM<sub>2.5</sub> calculated and recorded on a semi-annual basis.</li> </ol>	1-135
38.	The following information for each baghouse and cartridge filter must be collected, recorded at the intervals specified below, and readily available on-site for inspection: <ol style="list-style-type: none"> <li>Maintenance activity (including bag and cartridge replacements), process upsets, and equipment upsets or breakdowns recorded for each occurrence;</li> <li>Differential pressure across the filter media in each operating baghouse and cartridge filter recorded each calendar week. A record must be made for any baghouse or cartridge filter (or associated source) that is not in operation for a specified monitoring period; and</li> <li>Hours of operation for each baghouse and cartridge filter recorded for each calendar month.</li> </ol>	1-2, 4-18, 20-61, 65-106, 108-110, 112-114, 117-135

#### Emission Monitoring and Testing Requirements

<b>Req. No.</b>	<b>Emission Monitoring and Testing Requirements</b>	<b>Equipment/ Activity ID No.</b>
39.	The following sets of visible emissions observations during ship loading operations must be collected, recorded at the intervals specified below, and readily available on-site for inspection: <ol style="list-style-type: none"> <li>30 minutes of visible emission observations of ship loading during initial fill must be performed and recorded for at least two separate ship loading events each calendar month in accordance with SWCAA Method 9;</li> <li>30 minutes of visible emission observations of ship loading during mid-hold fill must be performed and recorded for at least two separate ship loading events each calendar month in accordance with SWCAA Method 9; and</li> <li>30 minutes of visible emission observations of ship loading during topping off must be performed and recorded for at least two separate ship loading events each calendar month in accordance with SWCAA Method 9.</li> </ol> <p>Observations must be taken across the top of a ship hold during active loading. If cement holes are in use during the observation period, observations must be made at an associated hold vent. During any monthly period in which no ships are loaded, a record must be made to that effect and the record must satisfy the observation requirement.</p>	107, 111, 115

<b>Req. No.</b>	<b>Emission Monitoring and Testing Requirements</b>	<b>Equipment/ Activity ID No.</b>
40.	Emission testing of filters F1040, F1050, F8701, F1430, F1450, F1920, F2031, F2032, F2209, F3110, F35107, F3424, F3425, and F8105 must be conducted no later than December 31, 2031. Subsequent emission testing must be conducted every ten (10) years thereafter, no later than December of the year in which testing is due. Emission testing conducted more than 13 months prior to the due date does not satisfy the periodic emission testing requirement unless approved in writing by SWCAA. All testing must be conducted in accordance with Appendix A of this ADP.	1-2, 4, 29, 56, 66, 71-72, 80, 86-88, 118, 127
41.	Emission testing of filters F2011, F2110, F4110, F4310, F4311, F5110, F5320, and F5510 must be conducted no later than December 31, 2032. Subsequent emission testing must be conducted every ten (10) years thereafter, no later than December of the year in which testing is due. Emission testing conducted more than 13 months prior to the due date does not satisfy the periodic emission testing requirement unless approved in writing by SWCAA. All testing must be conducted in accordance with Appendix A of this ADP.	14, 20, 23-24, 33, 94, 96, 102
42.	Visible emission evaluations of fugitive emissions from Rail Receiving Pit (H101, H102, H103) must be conducted no later than December 31, 2026. Subsequent emission testing must be conducted every five (5) years thereafter, no later than December of the year in which testing is due. Emission testing conducted more than 13 months prior to the due date does not satisfy the periodic emission testing requirement unless approved in writing by SWCAA. All testing must be conducted in accordance with Appendix B of this ADP.	3
43.	Visible emission evaluations of fugitive emissions from Barge Receiving Bucket Elevator BE40, West Storage System, Center Storage System, and East Storage System must be conducted no later than December 31, 2026. Subsequent emission testing must be conducted every five (5) years thereafter, no later than December of the year in which testing is due. Emission testing conducted more than 13 months prior to the due date does not satisfy the periodic emission testing requirement unless approved in writing by SWCAA. All testing must be conducted in accordance with Appendix B of this ADP.	19, 62-64
44.	Visible emission evaluations of fugitive emissions from East Ship Loader Spout TSP61, Center Ship Loader Spout TSP62, and West Ship Loader Spout TSP63 must be conducted no later than December 31, 2023. Subsequent emission testing must be conducted every five (5) years thereafter, no later than December of the year in which testing is due. Emission testing conducted more than 13 months prior to the due date does not satisfy the periodic emission testing requirement unless approved in writing by SWCAA. All testing must be conducted in accordance with Appendix C of this ADP.	107, 111, 115

<b>Req. No.</b>	<b>Emission Monitoring and Testing Requirements</b>	<b>Equipment/ Activity ID No.</b>
45.	Emission testing of filters F1921, F1922, F1923, F2012, F2021, F2022, F3115, F3120, F3420, F3421, F3422, F3423, F4115, and F4118 must be conducted no later than December 31, 2023. Subsequent emission testing must be conducted every ten (10) years thereafter, no later than December of the year in which testing is due. Emission testing conducted more than 13 months prior to the due date does not satisfy the periodic emission testing requirement unless approved in writing by SWCAA. All testing must be conducted in accordance with Appendix A of this ADP.	15-17, 21-22, 30-32, 57, 82-85, 122
46.	Emission testing of filters F1820, F1821, F1822, F1823, F2111, F2112, F2113, F2114, F2115, F2116, F2117, F2118, F2210, F801 (VE), F802 (VE), F803 (VE), F804 (VE), and F8715 (VE) must be conducted no later than December 31, 2024. Subsequent emission testing must be conducted every ten (10) years thereafter, no later than December of the year in which testing is due. Emission testing conducted more than 13 months prior to the due date does not satisfy the periodic emission testing requirement unless approved in writing by SWCAA. All testing must be conducted in accordance with Appendix A of this ADP.	25-28, 34-41, 73-76, 81, 117
47.	Emission testing of filters F2119, F2120, F2310 F2311, F2312, F2313, F2314, F2315, F2316, F2317, F2318, F2319, and F2320 must be conducted no later than December 31, 2025. Subsequent emission testing must be conducted every ten (10) years thereafter, no later than December of the year in which testing is due. Emission testing conducted more than 13 months prior to the due date does not satisfy the periodic emission testing requirement unless approved in writing by SWCAA. All testing must be conducted in accordance with Appendix A of this ADP.	42-54
48.	Emission testing of filters F1530, F1550, F1620, F1623, F1625, F1630, F1635, F1720, F1723, F1725, F1730, F1735, F35106, F35207, F35208, F35306, F35307 must be conducted no later than December 31, 2026. Subsequent emission testing must be conducted every ten (10) years thereafter, no later than December of the year in which testing is due. Emission testing conducted more than 13 months prior to the due date does not satisfy the periodic emission testing requirement unless approved in writing by SWCAA. All testing must be conducted in accordance with Appendix A of this ADP.	5-13, 65, 67-70, 119-121
49.	Emission testing of filters F3520, F3521, F3522, F3523, F3525, F5210, F5420, F5425, F5427, F5430, Roof Vent #1, Roof Vent #2, and Roof Vent #3 must be conducted no later than December 31, 2027. Subsequent emission testing must be conducted every ten (10) years thereafter, no later than December of the year in which testing is due. Emission testing conducted more than 13 months prior to the due date does not satisfy the periodic emission testing requirement unless approved in writing by SWCAA. All testing must be conducted in accordance with Appendix A of this ADP.	77-79, 89-93, 95, 99-101, 129



<b>Req. No.</b>	<b>Emission Monitoring and Testing Requirements</b>	<b>Equipment/ Activity ID No.</b>
50.	Emission testing of filters F3210, F3215, F3220, F3310, F3315, F3320, F5325, F5327, F5330, and F5610 must be conducted no later than December 31, 2028. Subsequent emission testing must be conducted every ten (10) years thereafter, no later than December of the year in which testing is due. Emission testing conducted more than 13 months prior to the due date does not satisfy the periodic emission testing requirement unless approved in writing by SWCAA. All testing must be conducted in accordance with Appendix A of this ADP.	58-61, 97-98, 103, 123-124, 128
51.	Emission testing of filters F2410, F4410, F4415, F20202, F20210, F40401, F40402, and F40403 must be conducted no later than December 31, 2029. Subsequent emission testing must be conducted every ten (10) years thereafter, no later than December of the year in which testing is due. Emission testing conducted more than 13 months prior to the due date does not satisfy the periodic emission testing requirement unless approved in writing by SWCAA. All testing must be conducted in accordance with Appendix A of this ADP.	125-126, 130-135
52.	Emission testing of filters F4010, F6110, F6115, F6130, F6210, F6215, F6230, F6310, F6315, and F6330 must be conducted no later than December 31, 2023. Subsequent emission testing must be conducted annually thereafter, no later than the end of December. All testing must be conducted in accordance with Appendix A of this ADP.	18, 104-106, 108-110, 112-114

### Reporting Requirements

<b>Req. No.</b>	<b>Reporting Requirements</b>	<b>Equipment/ Activity ID No.</b>
53.	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
54.	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; and c. No later than 30 days after the end of the month of discovery for all other excess emissions.	Facility-wide
55.	Upset conditions must be reported to SWCAA as soon as possible after discovery. The Permittee may provide notification to SWCAA via telephone. A message may be left on the answering machine for upset conditions that occur outside of normal business hours.	Facility-wide

<b>Req. No.</b>	<b>Reporting Requirements</b>	<b>Equipment/ Activity ID No.</b>
56.	A written annual, January through December, emissions inventory report must be submitted to SWCAA by March 15 of each year for the previous calendar year in accordance with SWCAA 400-105(1). The report must contain, at a minimum: <ol style="list-style-type: none"> <li>Quantity of PM, PM<sub>10</sub>, PM<sub>2.5</sub>, VOC, TAPs, and HAPs, emitted by the facility;</li> <li>Type (e.g., wheat, corn, soybeans, etc.) and quantity of grain received by rail and by barge, each;</li> <li>Type and quantity of grain loaded to ship; and</li> <li>Hours of operation of each baghouse and cartridge filter.</li> </ol>	1-135
57.	The following emission related data must be reported to SWCAA by September 15 and March 15 for the preceding periods of January to June and July to December, respectively: <ol style="list-style-type: none"> <li>Type and quantity of grain received by railcar for each month in the quarter;</li> <li>Type and quantity of grain received by barge for each month in the quarter;</li> <li>Type and quantity of grain loaded to ship for each month in the quarter;</li> <li>Monthly hours of operation for each baghouse and cartridge filter;</li> <li>Quantity of screenings material loaded to truck for each month in the quarter;</li> <li>A copy of bi-annual opacity certification cards for each person reading visible emissions;</li> <li>A copy of each ship loading visible emissions observation conducted by onsite personnel; and</li> <li>A summary of air emissions during the reporting period.</li> </ol>	1-135
58.	All test results must be reported to SWCAA in writing within 45 days of test completion.	1-17, 19-103, 107, 111, 115, 117-135

### 3. General Provisions

<b>Req. No.</b>	<b>General Provisions</b>
A.	For the purpose of ensuring compliance with this Permit, 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 Permit and applicable regulations and to perform or require such tests as may be deemed necessary.
B.	The provisions, terms, and conditions of this Permit 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 Permit survive any transfer of ownership of the source or any portion thereof.
D.	This Permit must be posted conspicuously at or be readily available near the source.

Req. No.	General Provisions
E.	This Permit 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 Permit does not supersede requirements of other agencies with jurisdiction and further, this Permit does not relieve the Permittee of any requirements of any other governmental agency. In addition to this Permit, the Permittee may be required to obtain permits or approvals from other agencies with jurisdiction.
G.	Compliance with the terms of this Permit 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 Permit is held to be invalid, all unaffected provisions of the Permit will remain in effect and be enforceable.
I.	No change in this Permit 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 Permit, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act.

**ADP 23-3607 APPENDIX A**  
**Emission Testing Requirements**  
**Baghouses and Cartridge Filters – PM and Visible Emissions**

**1. Background**

The purpose of emission testing is to quantify emissions and verify compliance with the requirements of this Permit. All of the baghouses and cartridge filters at this facility are subject to the requirements of New Source Performance Standards (NSPS) 40 CFR 60 Subpart DD, "Standards of Performance for Grain Elevators," with the following exceptions:

- ID 72: Screenings Bucket elevator BE81, F8105;
- ID 73: Screenings Bin DB801, F801;
- ID 74: Screenings Bin DB802, F802;
- ID 75: Screenings Bin DB803, F803;
- ID 76: Screenings Bin DB804, F804;
- ID 77: Screenings Loadout Roof Vent #1 (including filter F8504);
- ID 78: Screenings Loadout Roof Vent #2 (including filter F8505);
- ID 79: Screenings Loadout Roof Vent #3 (including filter F8506); and
- ID 117: Dust Transfer System, F8715.

**2. Test Constituents and Test Methods**

- a. Volumetric flow rate, gas velocity, and temperature using EPA Methods 1 and 2;
- b. Moisture content of stack gas using EPA Method 4;
- c. Particulate Matter (PM) using EPA Method 5 (front half) or Method 17, with the following exceptions:
  - When using EPA Method 5, regardless of whether the unit is subject to Subpart DD, a heated probe is not required;
  - Filter media must be constructed of borosilicate glass microfiber reinforced with woven glass cloth and bonded with PTFE or equivalent;
  - Reagents used must be low residue (<1 ppm residue) such as pesticide grade or equivalent.
- d. Visible Emissions (opacity) using EPA Method 9 (initial testing) and SWCAA Method 9 (periodic testing).
- e. Exceptions. The following units are subject to visible emission testing only:
  - ID 18: Barge Receiving Bucket Elevator BE40, F4010;
  - ID 73: Screenings Bin DB801, F801;
  - ID 74: Screenings Bin DB802, F802;
  - ID 75: Screenings Bin DB803, F803;
  - ID 76: Screenings Bin DB804, F804;
  - ID 77: Screenings Loadout Roof Vent #1 (no testing of F8405);
  - ID 78: Screenings Loadout Roof Vent #2 (no testing of F8406);
  - ID 79: Screenings Loadout Roof Vent #3 (no testing of F8407);
  - ID 104: East Ship Loader Conveyor BC61, F6110;
  - ID 105: East Ship Loader Conveyor BC61, F6115;
  - ID 106: East Ship Loader Spout TSP61, F6130;
  - ID 108: Center Ship Loader Conveyor BC62, F6210;

- e. Exceptions (continued).
  - ID 109: Center Ship Loader Conveyor BC62, F6215;
  - ID 110: Center Ship Loader Spout TSP62, F6230;
  - ID 112: West Ship Loader Conveyor BC63, F6310;
  - ID 113: West Ship Loader Conveyor BC63, F6315;
  - ID 114: West Ship Loader Spout TSP63, F6330; and
  - ID 117: Dust Transfer System, F8715.

The above constituents and test methods must be used provided that the test methods are determined by SWCAA to be appropriate test methods for this source. An alternative test method or procedures may be requested by the Permittee, in writing, to SWCAA. Upon review of the request, SWCAA must inform the Permittee, in writing, of the determination.

### 3. Testing Requirements

- a. Notification.
  - (1) For any initial test on a unit subject to Subpart DD, SWCAA must be notified a minimum of thirty (30) calendar days prior to the proposed test date.
  - (2) For all other tests (initial tests and periodic tests), SWCAA must be notified a minimum of five (5) calendar days prior to the proposed test date.
- b. Test Plan. A comprehensive test plan must be submitted to SWCAA for review and approval a minimum of fourteen (14) calendar days prior to the proposed test date.
- c. Test Location.
  - (1) PM Testing. PM testing must be performed at the air outlet of the applicable baghouse, vent, or cartridge filter.
  - (2) Visible Emissions Testing.
    - (A) Visible emissions testing for the ship loader spouts must be performed by observing the air outlet of one of the two bustle filter fans on each spout during topping-off when the bustle filters are visible above the ship's hold.
    - (B) Visible emissions testing for all other units must be performed at the air outlet of the applicable baghouse, vent, or cartridge filter.
- d. Test Duration.
  - (1) Initial Test for PM. The initial emission test for PM must include a minimum of three (3) test runs, each at least two (2) hours in duration, and be performed at normal maximum throughput or process operating conditions.
  - (2) Periodic Testing for PM. Periodic emission tests for PM must include a minimum of three (3) test runs, each at least two (2) hours in duration, and be performed at normal maximum throughput or process operating conditions.
  - (3) Initial Test for Visible Emissions.
    - (A) For sources subject to Subpart DD, the initial emission test for visible emissions must include a minimum of three (3) 1-hour test runs and be performed concurrently with a PM test as per 40 CFR 60.11(b).
    - (B) For sources not subject to Subpart DD, the initial emission test for visible emissions must include a minimum of three (3) 6-minute test runs with each run performed concurrently with a PM test run.
    - (C) For the screenings loadout roof vents, the initial emission test for visible emissions must include a minimum of three (3) 6-minute test runs with each run performed on a separate truck loading event.

## d. Test Duration (continued).

## (4) Periodic Testing for Visible Emissions.

- (A) For sources subject to Subpart DD, periodic emission tests for visible emissions must include a minimum of three (3) 6-minute test runs with each run performed concurrently with a PM test run. If any individual reading of visible emissions during a run is above the applicable emission limit, then an additional six (6) minutes of readings must be taken. The total readings taken during a run must not exceed one (1) hour.
- (B) For the screenings loadout roof vents, periodic emission tests for visible emissions must include a minimum of three (3) 6-minute test runs with each run performed on a separate truck loading event.
- (C) For units associated with the Ship Loader Conveyors (IDs 104, 105, 108, 109, 112, 113), Ship Loader Spouts (IDs 106, 110, 114), and Barge Receiving Bucket Elevator (ID 18), periodic emission tests for visible emissions must include a minimum of thirty (30) minutes of consecutive readings.

- e. Source Operation. Source operations during the emissions test must be representative of the maximum level of normal operation.
- f. Test Records. A complete record of production related parameters, process start-ups, shutdowns, and adjustments must be kept during emissions testing to correlate operations with emissions and must be recorded in the test results final report.

**4. Reporting Requirements**

Unless otherwise directed by SWCAA, a final test report must be prepared and submitted to SWCAA within forty-five (45) calendar days of test completion in both hardcopy and electronic (pdf or similar) format and, at a minimum, must contain the following information:

- a. Description of the source including manufacturer, model number, serial number, and design capacity of the equipment, and the location of the sample ports or test locations (include photographs if possible);
- b. Time and date of the test and identification and qualifications of the personnel involved;
- c. Summary of results, reported in units and averaging periods consistent with the application emissions standard or unit;
- d. Summary of control system or equipment operating conditions;
- e. Summary of production related parameters (e.g., commodity type, loading rate, fill method, oiling rate);
- f. A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation;
- g. A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation;
- h. Copy of field data and example calculations;
- i. Chain of custody information;
- j. Calibration documentation;
- k. Discussion of any abnormalities associated with the results; and
- l. 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.

**ADP 23-3607 – APPENDIX B**  
**Emission Testing Requirements**  
**Fugitive Emission Sources – Visible Emissions**

**1. Background**

The purpose of emission testing is to verify compliance of fugitive emission sources with the requirements of this Permit. Fugitive emission sources at this facility include:

- ID 3: Rail Receiving Pit H101, H102, and H103;
- ID 19: Barge Receiving Bucket Elevator BE40;
- ID 62: West Storage System;
- ID 63: Center Storage System;
- ID 64: East Storage System;

All of the above emission sources are subject to the requirements of New Source Performance Standards (NSPS) 40 CFR 60 Subpart DD, "Standards of Performance for Grain Elevators" and to requirements under the ADP.

**2. Test Constituents and Test Methods**

The Permittee must test for visible emissions (opacity) using EPA Method 9 and SWCAA Method 9 unless alternative methods, schedules, or procedures are requested in advance, in writing, by the Permittee and approved by SWCAA. Upon review of the request, SWCAA must inform the Permittee, in writing, of the determination.

**3. Testing Requirements****a. Notification.**

- (1) For any initial test on a unit subject to Subpart DD, SWCAA must be notified a minimum of thirty (30) calendar days prior to the proposed test date.
- (2) For all other tests (initial tests not subject to Subpart DD and all periodic tests), SWCAA must be notified a minimum of five (5) calendar days prior to the proposed test date.

**b. Test Plan.** A comprehensive test plan must be submitted to SWCAA for review and approval a minimum of fourteen (14) calendar days prior to the proposed test date.**c. Test Location.**

- (1) For grain receiving from railcar, emission testing must be performed at the entrance and exit of the railcar shed during grain unloading.
- (2) For grain receiving from barge, emission testing must be performed at the top of the sump cap during grain unloading.
- (3) For storage silos, emission testing must be performed at one or more bin vents associated with the affected process while product is being transferred into the silo.

**d. Test Duration.**

- (1) Initial Tests. Initial testing for visible emissions must be performed for a minimum of three (3) hours (thirty 6-minute averages) as per 40 CFR 60.11(b).
- (2) Periodic Tests. Periodic testing for visible emissions for all sources must include a minimum of six (6) minutes of observations. If no opacity reading is greater than zero, observations may stop. If any opacity reading is greater than zero, observations must continue for a minimum of one (1) hour (ten 6-minute averages).

**e. Source Operation.** Source operations during the emission test must be representative of the maximum level of normal operation.

- f. Test Records. A complete record of production related parameters, process start ups, shutdowns, and adjustments must be kept during emission testing to correlate operations with emissions and must be recorded in the test results final report.

#### **4. Reporting Requirements**

Unless otherwise directed by SWCAA, final test report must be prepared and submitted to SWCAA within forty-five (45) calendar days of test completion in both hardcopy and electronic (pdf or similar) format and, at a minimum, must contain the following information:

- a. Description of the source including manufacturer, model number, serial number, and design capacity of the equipment, and the location of the sample ports or test locations;
- b. Time and date of the test and identification and qualifications of the personnel involved;
- c. Summary of results, reported in units and averaging periods consistent with the application emissions standard or unit;
- d. Summary of control system or equipment operating conditions;
- e. Summary of production related parameters (e.g., commodity type, oiling rate, transfer rate);
- f. A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation;
- g. A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation;
- h. Copy of field data and example calculations;
- i. Discussion of any abnormalities associated with the results; and
- j. A statement signed by the senior management official of the testing firm certifying the validity of the source test report.



**ADP 23-3607 – APPENDIX C**  
**Emission Testing Requirements**  
**Shiploading – Visible Emissions**

**1. Background**

The purpose of emission testing is to verify compliance with applicable visible emission limitations for shiploading. Affected fugitive emission sources include:

- ID 107: East Ship Loader Spout TSP61;
- ID 111: Center Ship Loader Spout TSP62; and
- ID 115: West Ship Loader Spout TSP63.

All of the above fugitive emission sources are subject to the requirements of 40 CFR 60 Subpart DD, "Standards of Performance for Grain Elevators".

**2. Test Constituents and Test Methods**

Initial testing for visible emissions (opacity) must be conducted using EPA Method 9. Periodic testing for visible emissions must be conducted using SWCAA Method 9. The Permittee may request, in writing, to use alternative methods or procedures. Alternative methods or procedures must be approved by SWCAA in writing prior to use.

**3. Testing Requirements****a. Notification.**

- (1) For initial testing, SWCAA must be notified a minimum of thirty (30) calendar days prior to the proposed test date.
- (2) For periodic tests, SWCAA must be notified a minimum of five (5) calendar days prior to the proposed test date.
- (3) A comprehensive test plan must be submitted to SWCAA for review and approval a minimum of fourteen (14) calendar days prior to the proposed test date.

**b. Test Location.** Testing must be performed across the opening of a ship hold during active loading.**c. Test Duration.**

- (1) Initial Source Tests. The initial test for visible emissions must be performed for a minimum of three (3) hours (thirty 6-minute averages) as per 40 CFR 60.11(b);
- (2) Periodic Testing. Periodic testing for visible emissions must be performed for a minimum of one (1) hour (ten 6-minute averages). Data must be collected during active ship loading operations at the intervals specified below:
  - (A) Twelve (12) minutes of visible emission observations of ship loading during initial fill;
  - (B) Thirty-six (36) minutes of visible emission observations of mid-hold ship loading; and
  - (C) Twelve (12) minutes of visible emission observations of ship loading during topping-off.

**d. Source Operation.** Source operations during the emissions test must be representative of the maximum level of normal operation.**e. Test Records.** A complete record of production related parameters, process start ups, shutdowns, and adjustments must be kept during emissions testing to correlate operations with emissions and must be recorded in the test results final report.

**4. Reporting Requirements**

Unless otherwise directed by SWCAA, a final test report must be prepared and submitted to SWCAA within forty-five (45) calendar days of test completion in both hardcopy and electronic (pdf or similar) format and, at a minimum, must contain the following information:

- a. Description of the source including manufacturer, model number, serial number, and design capacity of the equipment, and the location of the sample ports or test locations;
- b. Time and date of the test and identification and qualifications of the personnel involved;
- c. Summary of results, reported in units and averaging periods consistent with the application emissions standard or unit;
- d. Summary of control system or equipment operating conditions;
- e. Summary of production related parameters (e.g., oil application rate, commodity type, loading rate);
- f. A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation;
- g. A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation;
- h. Copy of field data and example calculations;
- i. Discussion of any abnormalities associated with the results; and
- j. A statement signed by the senior management official of the testing firm certifying the validity of the source test report.