SWCAA
Southwest Clean Air Agency

5101 NE 82nd Ave, Ste 102
Vancouver, WA 98662
(360) 574-3058
www.swcleanair.gov

June 25, 2025

Peter Howe
Tristar Transload PNW, Inc.
PO Box 424
Vancouver, WA 98666

RE: Preliminary Air Discharge Permit for Three Butane Transloaders and Additional Operating Site

Dear Peter Howe:

A preliminary determination to issue Air Discharge Permit (ADP) 25-3713 has been completed for ADP application CL-3288 pursuant to Section 400-110(4) of the General Regulations for Air Pollution Sources of the Southwest Clean Air Agency (SWCAA). Public notice for ADP application CL-3288 was published in the permit section of SWCAA's website on April 2, 2025. SWCAA received a request for a public comment period in response to the public notice. Therefore, a thirty (30) day public comment period will be provided for this permitting action.

Electronic copies of ADP 25-3713 and the associated Technical Support Document are available for public review in the "Open for Public Comment" section under the "Permits and Appeals" link on SWCAA's website (*http://www.swcleanair.gov*). Original copies are enclosed for your files. If you have any comments on this preliminary determination, please notify SWCAA within the specified comment period. If no comments are received, your final ADP will be issued at the conclusion of the comment period.

Sincerely,

Uri Papish
Executive Director

UP:AA

Enclosure: Technical Support Document and Air Discharge Permit 25-3713

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Uri Papish
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Enclosure: Technical Support Document and Air Discharge Permit 25-3713

**AIR DISCHARGE PERMIT**
**25-3713**

**Issued: June 25, 2025**
**Tristar Transload PNW, Inc.**
3702 NW Gateway Avenue, Vancouver, WA 98660
&
1309 West 11th Street Vancouver, WA 98660

**SWCAA ID – 2500**

DRAFT

REVIEWED BY: _____
Clinton Lamoreaux, Chief Engineer

APPROVED BY: _____
Uri Papish, Executive Director

## TABLE OF CONTENTS

## 1. Equipment/Activity Identification

| ID No. | Equipment/Activity | Control Equipment/Measure |
|---|---|---|
| 1 | Butane Transloader One P66, Sky Eye Measurement, s/n: 1639-ECP-1001 | Balanced vapor recovery |
| 2 | Butane Transloader Two S1505, Sky Eye Measurement, s/n: 1505-ECP | Balanced vapor recovery |
| 3 | Butane Transloader Three S1653, Sky Eye Measurement, s/n: 1653-ECP | Balanced vapor recovery |
| 4 | Butane Transloader One Diesel Generator Engine, Isuzu / BP-4LE2X, s/n: 4LE2-105255 | Ultra-low sulfur diesel |
| 5 | Butane Transloader Two Diesel Generator Engine, Isuzu / BP-4LE2X, s/n: 4LE2-115187 | Ultra-low sulfur diesel |
| 6 | Butane Transloader Three Diesel Generator Engine, Isuzu / BP-4LE2X, s/n: 4LE2-124370 | Ultra-low sulfur diesel |
| 7 | Propane Transloader One, Custom Build | Balanced vapor recovery |
| 8 | Propane Transloader Two, Custom Build | Balanced vapor recovery |
| 9 | Propane Transloader One Diesel Generator Engine, Yanmar / 3MTDA, s/n: 20160914B129 | Ultra-low sulfur diesel |
| 10 | Propane Transloader Two Diesel Generator Engine, Yanmar / 3MTDA, s/n: 20160914B389 | Ultra-low sulfur diesel |

## 2. Permit Requirements

The following tables detail the specific requirements of this Air Discharge Permit (ADP). In addition to the requirements listed below, equipment at this facility may be subject to other federal, state, and local regulations. The requirement number is identified in the left-hand column. The text of the requirement is contained in the middle column. The emission unit, equipment, or activity to which the requirement applies is listed in the right-hand column.

ADP 25-3713 supersedes ADP 19-3329 in its entirety.

**Emission Limits**

<table>
<tr><th>Req. No.</th><th>Emission Limits</th><th>Equipment/ Activity ID No.</th></tr>
<tr><td>1.</td><td>Volatile organic compound (VOC) emissions from disconnecting the transloaders must not exceed:<br><br><table><tr><th>Emission Unit</th><th>VOC Emission Limit (tons per year)</th></tr><tr><td>Butane Transloader 1</td><td>2.47</td></tr><tr><td>Butane Transloader 2</td><td>2.47</td></tr><tr><td>Butane Transloader 3</td><td>2.47</td></tr><tr><td>Butane Transloader 1, 2, and 3 combined</td><td>2.47</td></tr><tr><td>Propane Transloader 1</td><td>2.04</td></tr><tr><td>Propane Transloader 2</td><td>2.04</td></tr><tr><td>Propane Transloader 1 and 2 combined</td><td>2.04</td></tr></table><br>Annual emissions must be calculated using the methodology described in the Technical Support Document for this Air Discharge Permit.</td><td>1-3 and 7-8</td></tr>
<tr><td>2.</td><td>Volatile organic compound (VOC) emissions from fugitive leaks from the transloaders must not exceed:<br><br><table><tr><th>Emission Unit</th><th>VOC Emission Limit (tons per year)</th></tr><tr><td>Butane Transloader 1</td><td>1.15</td></tr><tr><td>Butane Transloader 2</td><td>1.15</td></tr><tr><td>Butane Transloader 3</td><td>1.15</td></tr><tr><td>Butane Transloader 1, 2, and 3 combined</td><td>1.15</td></tr><tr><td>Propane Transloader 1</td><td>1.62</td></tr><tr><td>Propane Transloader 2</td><td>1.62</td></tr><tr><td>Propane Transloader 1 and 2 combined</td><td>1.62</td></tr></table><br>Annual emissions must be calculated using the methodology described in the Technical Support Document for this Air Discharge Permit.</td><td>1-3 and 7-8</td></tr>
</table>

<table>
<tr><th>Req. No.</th><th>Emission Limits</th><th>Equipment/ Activity ID No.</th></tr>
<tr><td>3.</td><td>Emissions from each transloader engine must not exceed:<br><br>
<table>
<tr><th></th><th colspan="4">Emission Limits</th></tr>
<tr><th>Emission Unit</th><th>$NO_X$ lb/hr</th><th>$NO_X$ tpy</th><th>CO lb/hr</th><th>CO tpy</th></tr>
<tr><td>Butane Transloader 1 Engine</td><td>0.34</td><td>0.53</td><td>1.01E-03</td><td>1.56E-03</td></tr>
<tr><td>Butane Transloader 2 Engine</td><td>0.34</td><td>0.53</td><td>1.01E-03</td><td>1.56E-03</td></tr>
<tr><td>Butane Transloader 3 Engine</td><td>0.34</td><td>0.53</td><td>1.01E-03</td><td>1.56E-03</td></tr>
<tr><td>Propane Transloader 1 Engine</td><td>0.35</td><td>0.54</td><td>0.19</td><td>0.29</td></tr>
<tr><td>Propane Transloader 2 Engine</td><td>0.35</td><td>0.54</td><td>0.19</td><td>0.29</td></tr>
</table>
<br>The averaging time for the pounds per hour (lb/hr) emission limits is one hour. Annual emissions must be calculated using the methodology described in the Technical Support Document for this Air Discharge Permit.</td><td>4-6 and 9-10</td></tr>
<tr><td>4.</td><td>Toxic air pollutant emissions must not individually exceed the Small Quantity Emission Rate identified for that pollutant in WAC 173-460.<br><br>Annual emissions must be calculated using the methodology described in the Technical Support Document for this Air Discharge Permit.</td><td>Facility-wide</td></tr>
<tr><td>5.</td><td>Visible emissions from the transloader engines must not exceed zero percent (0%) opacity for more than three (3) minutes in any one-hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).</td><td>4-6 and 9-10</td></tr>
</table>

**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. | Operations that cause or contribute to a nuisance odor must use recognized good practice and procedures to reduce these odors to a reasonable minimum. | Facility-wide |
| 8. | Emission units and activities identified in this ADP 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. | Facility-wide |
| 9. | Each pollution control device 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. | Facility-wide |

| Req. No. | Operating Limits and Requirements | Equipment/ Activity ID No. |
|---|---|---|
| 10. | All exhausts must be discharged vertically into the ambient air. Any device that obstructs or prevents vertical discharge is prohibited. | Facility-wide |
| 11. | The Permittee must conduct leak detection and repair activities that meet the following minimum requirements:<br>(a) All equipment in volatile organic compound (VOC) service must be inspected within 30 days of startup for evidence of a leak. Subsequent leak inspections must be conducted no later than the end of December each year. Testing more than 3 months before the required due date will not satisfy the periodic inspection requirement without prior approval from SWCAA. Leak detection must be conducted in accordance with the requirements in Appendix A.<br>(b) When a leak is detected (during a scheduled leak inspection or at any other time), it must be repaired as soon as practicable, but not later than 15 calendar days after it was detected. A repair is not considered complete until the repaired component has been re-monitored for leaks.<br>(c) For the purpose of this requirement, "in VOC service" means that the piece of equipment contains or contacts a fluid that is at least 10 percent VOC by weight. Equipment containing propane or butane in liquid or gas form are in VOC service. | 1-3 and 7-8 |
| 12. | The transloader engines must only be fired on diesel fuel with a maximum sulfur content of 15 ppmw. Any fuel other than ultra-low sulfur diesel must be approved by SWCAA in writing prior to use. | 4-6 and 9-10 |
| 13. | Operation of each transloader engine must not exceed 3,080 hours per year. | 4-6 and 9-10 |
| 14. | A nonresettable time totalizer must be installed on each transloader engine and used to measure the number of hours each unit operates. | 4-6 and 9-10 |

**Monitoring and Recordkeeping Requirements**

| Req. No. | Monitoring and Recordkeeping Requirements | Equipment/ Activity ID No. |
|---|---|---|
| 15. | Except for data logged by a computerized data acquisition system, each record required by this ADP must include the date and the name of the person making the record entry, at minimum. If a control device or process is not operating, a record must be made to that effect. | Facility-wide |
| 16. | All records required by this ADP must be kept for a minimum period of no less than three (3) years and must be maintained in a form readily available for inspection by SWCAA representatives. | Facility-wide |

| Req. No. | Monitoring and Recordkeeping Requirements | Equipment/ Activity ID No. |
|---|---|---|
| 17. | The following information must be collected, recorded at the intervals specified below, and readily available on-site for inspection:<br>(a) The total number of trucks loaded must be recorded for each calendar year for each transloader;<br>(b) The total number of railcars unloaded must be recorded for each calendar year for each transloader;<br>(c) The total number of hours each transloader engine operated must be recorded for each calendar year;<br>(d) Each maintenance activity for each transloader engine and the hour-meter reading at the time of the maintenance;<br>(e) Excess emissions must be recorded for each occurrence;<br>(f) 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; and<br>(g) The site location for every piece of equipment must be recorded for each change in location. | Facility-wide |
| 18. | For each component monitored for leaks, the Permittee must record the following:<br>(a) The date of monitoring;<br>(b) The component identification by type (e.g. valve, pump, etc.);<br>(c) The monitoring method; and<br>(d) The presence or absence of a leak, and the measured leak concentration if monitored by a gas analyzer. | 1-3 and 7-8 |
| 19. | At least once per calendar month, a brief qualitative observation for the purpose of identifying the presence of visible emissions from emission units subject to an opacity limit must be performed during daylight hours while the unit is under normal operation (i.e., not in startup, shut down, or upset).<br>(a) If no visible emissions are observed, a record must be made and no further action is necessary; or<br>(b) If visible emissions are observed, then the Permittee must verify that the unit is meeting the applicable emissions limit. If the limit is being met, a record must be made and no further action is necessary; and<br>(c) If the unit is exceeding the applicable emissions limit, then the Permittee must report the excess emissions, make a record, and take corrective actions until such time as compliance with the limit can be demonstrated. | 1-10 |

**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. |
|---|---|---|
| 20. | Upset conditions must be reported to SWCAA as soon as possible after discovery by phone call, phone message or email. It is the Permittee's responsibility to verify that the upset conditions information was received. | Facility-wide |
| 21. | Excess emissions must be reported to SWCAA as follows:<br>(a) As soon as possible, but no later than twelve (12) hours after discovery for emissions that represent a potential threat to human health or safety;<br>(b) As soon as possible, but no later than forty-eight (48) hours after discovery for emissions which the Permittee wishes to claim as unavoidable pursuant to SWCAA 400-107(1); and<br>(c) No later than thirty (30) calendar days after the end of the month of discovery for all other excess emissions. | Facility-wide |
| 22. | Deviations from permit conditions must be reported as soon as possible but no later than 30 days after the end of the month during which the deviation is discovered. | Facility-wide |
| 23. | All air quality related complaints received by the Permittee must be reported to SWCAA within three (3) calendar days of receipt. Complaint reports must include the date and time of the complaint, the name and contact information (if available) for the complainant, the nature of the complaint, and any actions taken by the Permittee to address the complaint. | Facility-wide |
| 24. | An annual emissions inventory report must be submitted to SWCAA by March 15 for emissions from the previous calendar year in accordance with SWCAA 400-105(1). Each report must contain, at a minimum, the following information:<br>(a) The total number of trucks loaded for each transloader;<br>(b) The total number of railcars unloaded for each transloader;<br>(c) The total number of hours each transloader engine operated; and<br>(d) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs). | Facility-wide |
| 25. | Within ten (10) business days of initiating normal operation of the butane transloaders, each, the Permittee must notify SWCAA that the unit is operating. | Facility-wide |

**3. General Provisions**

| Req. No. | General Provisions |
|---|---|
| A. | For the purpose of ensuring compliance with this ADP, duly authorized representatives of the Southwest Clean Air Agency must be permitted access to the Permittee's premises and the facilities being constructed, owned, operated and/or maintained by the Permittee for the purpose of inspecting said facilities. These inspections are required to determine the status of compliance with this ADP and applicable regulations and to perform or require such tests as may be deemed necessary. |

| Req. No. | General Provisions |
|---|---|
| B. | The provisions, terms, and conditions of this ADP bind the Permittee, its officers, directors, agents, servants, employees, successors and assigns, and all persons, firms, and corporations acting under or for the Permittee. |
| C. | The requirements of this ADP survive any transfer of ownership of the source or any portion thereof. |
| D. | This ADP must be posted conspicuously at or be readily available near the source. |
| E. | This ADP will be invalidated, in whole or in part, if construction or installation of any new or modified equipment has not commenced within eighteen (18) months from date of issuance, if construction is discontinued for a period of eighteen (18) months or more without prior SWCAA approval, or if construction is not completed within a reasonable time. |
| F. | This ADP does not supersede requirements of other agencies with jurisdiction and further, this ADP does not relieve the Permittee of any requirements of any other governmental agency. In addition to this ADP, the Permittee may be required to obtain permits or approvals from other agencies with jurisdiction. |
| G. | Compliance with the terms of this ADP does not relieve the Permittee from the responsibility of compliance with SWCAA General Regulations for Air Pollution Sources, previously issued Regulatory Orders, RCW 70A.15, Title 173 WAC or any other applicable emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply. |
| H. | If any provision of this ADP is held to be invalid, all unaffected provisions of the ADP will remain in effect and be enforceable. |
| I. | No change in this ADP will be made or be effective except as may be specifically set forth by written order of the Southwest Clean Air Agency upon written application by the Permittee for the relief sought. |
| J. | The Southwest Clean Air Agency may, in accordance with RCW 70A.15, impose such conditions as are reasonably necessary to ensure the maintenance of compliance with the terms of this ADP, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act. |
| K. | For the purposes of establishing if a condition of this ADP has been violated or is being violated, nothing in this ADP precludes the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test procedures or methods had been performed. |

# Appendix A
# Air Quality Monitoring Requirements
# Leak Detection Monitoring Procedure

## 1. Background

The purpose of this monitoring is to determine the presence or absence of a leak in a specific component (valves, pumps, compressors, pressure relief valves, connectors, and any other equipment) in order to minimize emissions, provide a basis for emissions calculations, and to provide an adequate assurance of compliance with the terms and conditions of this Permit.

## 2. Constituents and Methods

a. The presence or absence of a leak may be detected using a liquid leak detector solution (e.g. Snoop®, Leak-Seek®, Cal-Blu®, or other bubble-forming soap solution); or
b. The presence or absence of a leak and the concentration of VOC being emitted by the leak may be determined using an approved gas analyzer conforming to 40 CFR 60 Appendix A Method 21.

The above constituents and methods must be used unless SWCAA determines an alternative method would be appropriate for this facility and approves the use of the alternative method in writing.

## 3 Monitoring Location for Liquid Leak Detector Solution Testing

The test location is along the entirety of each interface where the possibility of a leak exists.

## 4. Monitoring Location for Instrumental Testing

a. Valves. For valves, the most common source of leaks is at the seal between the stem and housing. To screen this source, the probe opening is placed where the stem exits the packing gland and is moved around the stem circumference. The maximum reading is recorded as the concentration value. Also, the probe opening is placed at the packing gland take-up connector seat, and the probe is moved along the periphery. In addition, valve housings of multipart assemblies should be screened at the surface of all points where leaks could occur. Screening points for several different types of valves are shown in Figs. 1–5.
b. Connectors and Flanges. For connectors, the probe opening is placed at the outer edge of the connector/gasket interface and the circumference of the connector is sampled. For screwed connectors, the threaded connection interface must also be screened. Other types of nonpermanent joints, such as through threaded connections, are sampled with a similar traverse.
c. Pumps, Compressors, and Agitators. Pumps, compressors, and agitators are screened with a circumferential traverse at the outer surface shaft and seal interface where the shaft exits the housing. If the source is a rotating shaft, the probe inlet is positioned within 1 centimeter of the shaft/seal interface. If the housing configuration prevents a complete traverse of the shaft periphery, all accessible portions must be sampled. All other joints on the pump or compressor housing where leakage could occur should also be sampled. Fig. 6 illustrates screening points for two types of centrifugal pumps.
d. Pressure Relief Devices. The configuration of most pressure relief devices prevents sampling at the sealing seat. Because of their design and function, pressure relief devices must be approached with extreme caution. These devices should not be approached during periods of process upsets, or other times when the device is likely to activate. Similarly, care must be used in screening pressure relief devices to avoid interfering with the working parts of the

device (e.g., the seal disk, the spring, etc.) For those devices equipped with an enclosed extension, or horn, the probe inlet is placed at approximately the center of the exhaust area to the atmosphere. It should be noted that personnel conducting the screening should be careful not to place hands, arms, or any parts of the body in the horn.

e. Other. Any other component not listed which has a potential for leak shall be tested along any interface through which material could leak.

**5. Procedure.**

a. Liquid Leak Detector Solution.
   (1) The component to be tested must be cleaned sufficiently as to not interfere with the visible observation of the liquid leak detector solution.
   (2) Using an appropriate liquid leak detector solution, the solution must be applied to the component test location.
   (3) The component must be observed for a minimum of one minute for the presence or absence of bubbles.
   (4) The presence of bubbles indicates that the component is leaking. If a leak is detected, gasket condition, flange tightness, valve position, plug security, etc., must be checked, and corrected. After taking corrective action, the component must be retested. If a component is found to be leaking in three (3) consecutive tests, the component must be recorded as failing the leak test and scheduled for repair.
   (5) The absence of bubbles indicates that the component is not leaking and that it has passed the leak test.

b. Approved Gas Analyzer.
   (1) The gas must be calibrated with methane on the day of the monitoring. The Permittee must keep records of the following, at minimum:
      (A) Calibration gas manufacturer and supplier;
      (B) Concentration value (ppmv); and
      (C) Expiration date of the calibration gas.
   (2) The probe inlet must be placed at the test location. Care must be taken to ensure that the probe is held perpendicular, not tangential, to the leak potential interface; otherwise, inaccurate readings will result.
   (3) The probe must be moved along the interface periphery while the instrument readout is observed. If an increased meter reading is observed, the probe must be moved slowly along the interface where concentrations register until the maximum meter reading is obtained. The probe inlet must be left at this maximum reading location for approximately two times the instrument response time. The maximum reading is recorded as the concentration value.
   (4) If the maximum reading exceeds the scale of the instrument (i.e. pegged), a dilution probe must be employed to measure concentrations greater than the instrument's normal range. The analyzer should be recalibrated to the higher concentration.
   (5) Record the maximum meter reading, do not subtract background concentration.
   (6) Any component with a liquid leak must be reported as 999,999 ppmv.

# Appendix A
# Air Quality Monitoring Requirements
# Leak Detection Monitoring Procedure

**6. Records**

For each leak test for each component, the following information must be recorded:

a. The component identification;
b. The date of the initial monitoring;
c. The name or initials of the person performing the monitoring;
d. The method being used for leak detection;
e. The presence or absence of a leak and if using an approved gas analyzer, the measured concentration of the leak;
f. If a leak was detected:
   (1) If the leak was repaired, the results of the re-test;
   (2) If the leak was scheduled to be repaired within the next fifteen (15) days, the date the repair was scheduled, the date the repair was completed, and the results of the retest; and
   (3) If the leak could not be repaired, the date notification was sent to SWCAA, the date the repair was scheduled, the date the repair was completed, and the results of the retest.