



January 24, 2018

Mr. Tom Rodman, Terminal Manager  
TEMCO, LLC - Kalama  
400 Toteff Road  
Kalama, WA 98625

Subject: Final Air Discharge Permit for Installation of New Baghouses A and B

Dear Mr. Rodman:

A final determination to issue Air Discharge Permit 18-3262 (ADP 18-3262) has been completed for Air Discharge Permit (ADP) Application CO-978 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-978 was published in the permit section of SWCAA's internet website on July 13, 2017. 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 18-3262 and the associated Technical Support Document are available for public review in the permit section of SWCAA's internet website (<http://www.swcleanair.org/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  
Attachment



**SOUTHWEST CLEAN AIR AGENCY**

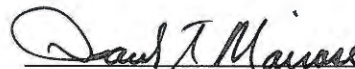
**AIR DISCHARGE PERMIT  
18-3262**

**Final Date: January 24, 2018**

Facility Name: TEMCO, LLC  
Physical Location: 400 Toteff Road  
Kalama, WA 98625

SWCAA ID: 711

REVIEWED BY:

  
\_\_\_\_\_  
Paul T. Mairose, Chief Engineer



APPROVED BY:

  
\_\_\_\_\_  
Uri Papish, Executive Director

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**1. Equipment/Activity Identification**

<b>ID No.</b>	<b>Generating Equipment/Activity</b>	<b># of Units</b>	<b>Control Measure/Equipment</b>	<b># of Units</b>
1	Grain Receiving – Railcar Pit 2	1	Baghouse N	1
2	Grain Receiving – Railcar Pit 1	1	Baghouse D	1
3	Grain Receiving – Railcar Fugitive Emissions	N/A	Process Enclosure	N/A
4	Grain Receiving – Barge Marine Leg	1	Partial Enclosure, Filter DS100	1
5	Grain Receiving – Barge Fugitive Emissions	N/A	Process Enclosure	N/A
6	Grain Receiving – Truck Dust/Screenings Storage	1	Partial Enclosure, Baghouse E	1
7	Grain Receiving – Truck Fugitive Emissions	N/A	Process Enclosure	1
8	Workhouse Basement (System 4)	N/A	Process Enclosure, Baghouse B	1
9	Tanks 801-807, Tripper and Belt Loaders	N/A	Process Enclosure, Baghouse F	1
10	Workhouse Mayo Floor, Bins, and Garners	N/A	Process Enclosure, Baghouse H	1
11	Work House Vents and Belt Floor	N/A	Process Enclosure, Baghouse J	1
12	Grain Loading – Railcar Fugitive Emissions	1	Oil Application	N/A
13	Silo Basement Belts and Concrete Silo Tops (Systems 5, 6, 7 & 23)	N/A	Process Enclosure, Baghouse A	1
14	Grain Cleaning Operations	N/A	Process Enclosure, Filter DS370	1
15	Tanks 901-905, Tripper and Belt Loaders	N/A	Process Enclosure, Baghouse P	1
16	Grain Loading – Ship Fugitive Emissions	N/A	Oil Application	1
17	Haul Roads – Fugitive Emissions	N/A	Sweeping, Washing	N/A
18	Belt Conveyor BC-101	1	Process Enclosure, Filter DS101A	1
19	Belt Conveyor BC-101	1	Process Enclosure, Filter DS101	1
20	Barge Receiving Scales	N/A	Process Enclosure, Filter DS110	1
21	Barge Receiving Bucket Elevator	1	Process Enclosure, Filter DS120	1
22	Belt Conveyor BC-121	1	Process Enclosure, Filter DS121	1
23	Bucket Elevator BE-221	1	Process Enclosure, Filter DS221	1
24	Bucket Elevator BE-222	1	Process Enclosure, Filter DS222	1
25	Shipping Scales	N/A	Process Enclosure, Filter DS230A	1
26	Shipping Scales	N/A	Process Enclosure, Filter DS230B	1
27	Shipping Bins SB-01 to SB-04, Belt Conveyor BC-241	N/A	Process Enclosure, Filter DS241	1
28	Shipping Bins SB-05 to SB-08, Belt Conveyor BC-243	N/A	Process Enclosure, Filter DS243	1
29	Belt Conveyor BC-301	1	Process Enclosure, Filter DS301	1
30	Bucket Elevator BE-331	1	Process Enclosure, Filter DS331	1
31	Bucket Elevator BE-341	1	Process Enclosure, Filter DS341	1

<b>ID No.</b>	<b>Generating Equipment/Activity</b>	<b># of Units</b>	<b>Control Measure/Equipment</b>	<b># of Units</b>
32	Bucket Elevator BE-358	1	Process Enclosure, Filter DS358	1
33	Dust Bin DB-401	1	Process Enclosure, Filter DS401	1
34	Screenings Bin SCB-402	1	Process Enclosure, Filter DS402	1
35	Screenings Bin SCB-403	1	Process Enclosure, Filter DS403	1
36	Screenings Bin SCB-404	1	Process Enclosure, Filter DS404	1
37	Loadout Station #2	N/A	Process Enclosure, Filter DS415A Filter DS415B, Filter DS415C	1
38	Ship Conveyor BC-552	1	Process Enclosure, Filter DS552	1
39	Ship Transfer Conveyor BC-560	1	Process Enclosure, Filter DS560	1
40	Grain Loading – Ship South Spout (TS-601)	1	Aspirated Spout, Filter DS601B	1
41	Grain Loading – Ship South Spout Shuttle Conveyor (BC-601)	1	Process Enclosure, Filter DS601A	1
42	Grain Loading – North Ship Spout (TS-602)	1	Aspirated Spout, Filter DS602B	1
43	Grain Loading – Ship North Spout Shuttle Conveyor (BC-602)	1	Process Enclosure, Filter DS602A	1
44	Loadout Station #1	N/A	Process Enclosure, Filter DS715A, Filter DS715B, Filter DS715C	1
45	Grain Receiving – Railcar Pit 3	N/A	Process Enclosure, Filter DS751	1
46	Bulk Weigh Systems	N/A	Process Enclosure, Filter DS754	1
47	Bucket Elevator BE-757	1	Process Enclosure, Filter DS757	1
48	Belt Conveyor BC-202	1	Process Enclosure, Filter DS202	1
49	Dust Bin 701	1	Process Enclosure, Filter DS701	1

## 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.

This Permit supersedes Air Discharge Permit 13-3072R1 in its entirety.

**2.1 Emission Limits**

No.	Emission Limits	Equipment/ Activity												
1.	<p>Combined emissions from facility operations shall not exceed any of the following:</p> <table border="0" style="width: 100%;"> <tr> <td style="text-align: center;"><u>Pollutant</u></td> <td style="text-align: center;"><u>Emission Limit</u></td> </tr> <tr> <td style="text-align: center;">PM</td> <td style="text-align: center;">64.26 tpy</td> </tr> <tr> <td style="text-align: center;">PM<sub>10</sub></td> <td style="text-align: center;">51.04 tpy</td> </tr> <tr> <td style="text-align: center;">PM<sub>2.5</sub></td> <td style="text-align: center;">8.69 tpy</td> </tr> </table> <p>Emissions shall be calculated based on actual material throughput consistent with the methodology outlined in Section 6 of the technical support document for this permit. Annual emissions shall be summed monthly over a rolling twelve (12) month period.</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 shall be reduced to one-third (1/3) its normal value from the date of the violation until the date compliance with the opacity limit is again demonstrated.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM	64.26 tpy	PM <sub>10</sub>	51.04 tpy	PM <sub>2.5</sub>	8.69 tpy	1-49				
<u>Pollutant</u>	<u>Emission Limit</u>													
PM	64.26 tpy													
PM <sub>10</sub>	51.04 tpy													
PM <sub>2.5</sub>	8.69 tpy													
2.	PM <sub>10</sub> exhaust concentration from existing dust collectors and bin vents shall not exceed 0.0035 gr/dscf (1-hr avg) as determined by the methodology specified in Appendix A of this permit.	1-2, 6, 9-11, 15												
3.	PM <sub>10</sub> exhaust concentration from new dust collectors and bin vents shall not exceed 0.002 gr/dscf (1-hr average) as determined by the methodology specified in Appendix A of this permit.	4, 8, 13-14, 18-49												
4.	Visible emissions from dust collector exhaust shall not exceed 0% opacity in any 1-hour period, as determined by a Certified Observer in accordance with EPA Method 9 and SWCAA Method 9.	1-2, 4, 6, 8-11, 13-15, 18-49												
5.	<p>Visible emissions while receiving grain from barges shall not exceed the values listed below for more than 3 minutes in any 1-hour period, as determined by a Certified Observer in accordance with EPA Method 9 and SWCAA Method 9.</p> <table border="0" style="width: 100%;"> <tr> <td style="text-align: center;"><u>Operating Mode</u></td> <td style="text-align: center;"><u>Emission Limit</u></td> </tr> <tr> <td>Initial Operation (first 20 minutes of delivery)</td> <td style="text-align: center;">20% opacity</td> </tr> <tr> <td>Regular Operation (remainder of delivery)</td> <td style="text-align: center;">0% opacity</td> </tr> </table>	<u>Operating Mode</u>	<u>Emission Limit</u>	Initial Operation (first 20 minutes of delivery)	20% opacity	Regular Operation (remainder of delivery)	0% opacity	5						
<u>Operating Mode</u>	<u>Emission Limit</u>													
Initial Operation (first 20 minutes of delivery)	20% opacity													
Regular Operation (remainder of delivery)	0% opacity													
6.	<p>Visible emissions from the operations listed below shall not exceed the specified values for more than 3 minutes in any 1-hour period, as determined by a Certified Observer in accordance with EPA Method 9 and SWCAA Method 9.</p> <table border="0" style="width: 100%;"> <tr> <td style="text-align: center;"><u>Facility Activity</u></td> <td style="text-align: center;"><u>Emission Limit</u></td> </tr> <tr> <td>Internal Handling Operations</td> <td style="text-align: center;">0% opacity</td> </tr> <tr> <td>Grain Receiving – Railcars</td> <td style="text-align: center;">5% opacity</td> </tr> <tr> <td>Grain Receiving – Trucks</td> <td style="text-align: center;">5% opacity</td> </tr> <tr> <td>Grain Loadout – Railcar</td> <td style="text-align: center;">10% opacity</td> </tr> <tr> <td>Loadout – Trucks</td> <td style="text-align: center;">0% opacity</td> </tr> </table>	<u>Facility Activity</u>	<u>Emission Limit</u>	Internal Handling Operations	0% opacity	Grain Receiving – Railcars	5% opacity	Grain Receiving – Trucks	5% opacity	Grain Loadout – Railcar	10% opacity	Loadout – Trucks	0% opacity	3, 7-15, 18-49
<u>Facility Activity</u>	<u>Emission Limit</u>													
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Grain Loadout – Railcar	10% opacity													
Loadout – Trucks	0% opacity													

No.	Emission Limits	Equipment/ Activity						
7.	<p>Visible emissions while loading grain to ships shall not exceed the values listed below for more than three (3) minutes in any 1-hour period, as determined in accordance with EPA Method 9 and SWCAA Method 9:</p> <table border="0" data-bbox="194 388 933 493"> <tr> <td data-bbox="194 388 722 420"><u>Operating Mode</u></td> <td data-bbox="722 388 933 420"><u>Emission Limit</u></td> </tr> <tr> <td data-bbox="194 420 722 451">Topping Off</td> <td data-bbox="722 420 933 451">20% opacity</td> </tr> <tr> <td data-bbox="194 451 722 493">Initial/Mid-hold Fill</td> <td data-bbox="722 451 933 493">10% opacity</td> </tr> </table> <p>Topping-off is defined as the last 5% by volume of each ship's hold. Visible emission observations shall be made at the hatch opening.</p>	<u>Operating Mode</u>	<u>Emission Limit</u>	Topping Off	20% opacity	Initial/Mid-hold Fill	10% opacity	16
<u>Operating Mode</u>	<u>Emission Limit</u>							
Topping Off	20% opacity							
Initial/Mid-hold Fill	10% opacity							

## 2.2 Operating Limits and Requirements

No.	Operating Limits and Requirements	Equipment/ Activity
8.	Reasonable precautions shall be taken at all times to prevent and minimize fugitive emissions from facility operations.	Facilitywide
9.	The permittee shall use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facilitywide
10.	Emission units identified in this ADP shall be maintained and operated in total and continuous conformity with the emission levels and operational requirements specified 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.	1-49
11.	Each pollution control device shall be operated whenever the processing equipment served by that air pollution control device is in operation. Control devices shall be operated and maintained in accordance with the manufacturer's specifications. Furthermore, air pollution control devices shall be operated in a manner that minimizes emissions.	1-49
12.	Only corn, wheat, barley, soybeans, milo, beet pulp pellets, canola, flaxseed, DDGS, soybean meal and dry yellow peas shall be received, processed, or shipped from the facility. All of these commodities shall be considered "grain" for purposes of determining compliance with this permit.	1-49
13.	Dust collectors serving the railcar receiving pits shall be in operation at all times during grain receipt. Receiving pit aspiration shall be applied during the entire unloading process.	1-2, 45
14.	Good housekeeping procedures shall be used to minimize fugitive emissions from the rail receiving pits during periods when grain is not being received.	1-3, 45
15.	The entrance and exit openings of the railcar unloading sheds shall be equipped with fixed or flexible curtain walls for the purpose of minimizing the amount of open space between the openings and the sides of railcars. Curtain walls shall be maintained in good working condition. Vertical clearance shall not be greater than 18 feet above the rails. Horizontal opening width shall not be greater than 17 feet.	1-3, 45

No.	Operating Limits and Requirements	Equipment/ Activity
16.	Receiving grain from barges shall only be conducted while marine leg aspiration is in operation.	4-5
17.	Barge hatches shall be kept closed during unloading operations except for when in active use for marine leg access or inspection.	5
18.	Baghouse E shall be in operation at all times while the facility is receiving grain from trucks.	6
19.	A differential pressure gage shall be installed and maintained to continuously monitor pressure drop across the filtration media in each dust collector. Each differential pressure gage or pressure display shall be located in an easily accessible location to facilitate operational monitoring.	1-2, 4, 6, 8-11, 13-15, 18-49
20.	A non-resettable hour meter shall be installed on each dust collector.	1-2, 4, 6, 8-11, 13-15, 18-49
21.	The Permittee shall maintain a supply of replacement filter bags and/or cartridges onsite sufficient to make prompt bag/cartridge replacement possible for all dust collectors at the facility.	1-2, 4, 6, 8-11, 13-15, 18-49
22.	Except as individually approved by SWCAA, the exhaust point or stack for each emission unit shall discharge vertically. Any device that obstructs or prevents vertical discharge is prohibited. During source testing, each stack shall have sufficient undisturbed length to meet the requirements of 40 CFR 60 Appendix A Method 1 (e.g., 2.5 diameters undisturbed length upstream, 0.5 diameters undisturbed length downstream).	4, 14, 18-27, 29-49
23.	The Permittee shall provide performance testing facilities as required under 40 CFR 60.8(e) for each affected emission unit. Testing facilities include the following: a. Sampling ports adequate for applicable test methods; b. Safe sampling platform(s); c. Safe access to sampling platform(s); and d. Utilities for sampling and testing equipment.	2, 4, 8-11, 13-15, 18-32, 38-39, 41, 43-49
24.	If SWCAA documents an opacity violation from any dust collector, the Permittee shall 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.	1-2, 4, 6, 8-11, 13-15, 18-49



No.	Operating Limits and Requirements	Equipment/ Activity
25.	<p>Operators at each dust/screenings loadout station shall use proper dust preventive procedures while loading dust/screenings. Such procedures shall include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>a. Rollup doors at each loadout station shall be closed whenever:               <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. The dust/screenings loadout hood shall be lowered over a loadout truck and checked for gaps prior to transferring material;</li> <li>c. Loadout hood filter units shall be operated at all times during active material transfer; and</li> <li>d. Loadout hood filter unit cleaning cycles shall only be performed when the loadout hood is lowered over a loadout truck and has been checked for gaps.</li> </ul>	37, 44
26.	<p>If a truck at a dust/screenings loadout station needs to be repositioned during loadout, the delivery of material through the loadout spout shall be suspended while the truck is repositioned.</p>	37, 44
27.	<p>All grain shall be oiled at a minimum rate of 3 qt/1,000 bu prior to being loaded into ships or railcars. Oil shall be applied in a manner that provides for thorough mixing and promotes even coating of grain streams. Oil application may be suspended or reduced if the Permittee demonstrates that approved operations are capable of reliably maintaining compliance with applicable emissions limits without the use of oil or at a reduced application rate. Compliance demonstrations shall be performed using the protocol specified in Appendix C of this permit.</p>	12, 16, 40, 42
28.	<p>While loading grain to a ship, ship loader spout operators shall use proper dust minimization procedures. Such procedures shall include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>a. Ship loader spouts shall be installed, operated, maintained, and serviced in accordance with manufacturer's operating instructions and maintenance and service manuals;</li> <li>b. Spout aspiration shall be maximized and in operation at all times during grain transfer;</li> <li>c. Ship loader spouts shall be extended so that spout skirting contacts the hold or grain pile surface prior to loading grain;</li> <li>d. Ship loader spout skirting shall be kept in contact with the pile surface at all times during mid-hold loading;</li> <li>e. Ship loader spouts shall be kept as close to the grain pile surface as possible during topping off;</li> <li>f. Ship loader spouts shall be moved frequently within the hold to prevent excessively tall grain piles from developing; and</li> <li>g. Any deviation from normal ship loader spout operation that results in fugitive emissions in excess of applicable visible emissions standards shall be recorded in the operation log.</li> </ul>	16, 40, 42

No.	Operating Limits and Requirements	Equipment/ Activity
29.	<p>If visible emission observations indicate that visible emissions from a particular grain loading operation (delineated by grain type and loading mode) are in excess of applicable emission limits, the Permittee shall take the following actions:</p> <ol style="list-style-type: none"> <li>a. The Permittee shall identify the source of the emissions, and confirm whether or not affected equipment is experiencing a malfunction and that all relevant air pollution control equipment is operating properly. The time at which the source of the excess emissions is identified shall be recorded in the appropriate operating log. The Permittee shall take corrective action to resolve the problem within 1 hour of initial discovery. The nature of the corrective action taken and the time at which it was taken shall be recorded in the appropriate operating log;</li> <li>b. After taking corrective action, the permittee shall perform a visible emission observation of affected equipment for a minimum of 15 minutes. If observed visible emissions are in compliance with applicable emission limits, then no further action is necessary.</li> <li>c. If observed visible emissions are not in compliance, the Permittee shall commence oil application a minimum rate of 3 qt/1,000 bu (if not already oiling). The time at which oil application commences shall be recorded in the appropriate operating log;</li> <li>d. After commencing oil application, the Permittee shall perform a visible emission observation of affected equipment for a minimum of 15 minutes. If observed visible emissions are in compliance with applicable emission limits, then no further action is necessary. Oil application shall continue at the specified rate any time the affected loading operation is in use, until such time as compliance is successfully demonstrated pursuant to Appendix C of this permit;</li> <li>e. If observed visible emissions are not in compliance, the Permittee shall incrementally increase the rate of oil application and perform visible emission observations (minimum of 15 minutes per observation) after each increase. The time at which each incremental increase in oil application rate commences shall be recorded in the appropriate operating log. At any point where observed visible emissions are in compliance with applicable emission limits, oil application shall continue at the concurrent rate any time the affected loading operation is in use until such time as compliance is successfully demonstrated pursuant to Appendix C of this permit; and</li> <li>f. If a maximum oil application rate of 6 qt/1,000 bu is reached and observed visible emissions are not in compliance, the permittee shall continue oiling at 6 qt/1,000 bu and commence cleaning of all affected grain streams. The time at which grain cleaning commences shall be recorded in the appropriate operating log.</li> <li>g. After commencing oiling and cleaning of grain streams, the Permittee shall perform a visible emission observation of affected equipment for a minimum of 15 minutes. If observed visible emissions are in compliance with applicable emission limits, then no further action is necessary. Oiling and cleaning of affected grain streams shall continue any time the affected loading operation is in use until such time as compliance is successfully demonstrated pursuant to Appendix C of this permit.</li> <li>h. If observed visible emissions are still not in compliance, the affected loading operation shall be discontinued until such time as compliance can be achieved.</li> </ol>	16, 40, 42

No.	Operating Limits and Requirements	Equipment/ Activity
30.	Ship loading spouts and associated infrastructure shall be designed, installed and maintained such that the skirts of the ship loading spouts are capable of reaching the bottom of each ship hold under all loading conditions and/or river levels.	40, 42
31.	Loading of previously separated dust and/or screenings material to ships is prohibited.	40, 42
32.	Loading of grain into the wing tanks of ships using the ship loader spouts is prohibited.	40, 42
33.	All frequently used process and road areas shall be maintained to minimize fugitive dust formation. Paved areas with vehicle traffic shall be swept or washed as necessary to prevent excess fugitive emissions.	17

### 2.3 Monitoring and Recordkeeping Requirements

No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity
34.	With the exception of data logged by a computerized data acquisition system, each record required by this permit shall 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 time period, a record shall be made to that effect.	Facilitywide
35.	All records required by this permit shall be kept for a minimum period of no less than 5 years and shall be maintained in a form readily available for inspection by SWCAA representatives.	Facilitywide
36.	Excess emissions and upset conditions with potential to cause excess emissions shall be recorded for each occurrence.	Facilitywide
37.	<p>The following operational information shall be recorded, and kept readily available on-site for inspection:</p> <ul style="list-style-type: none"> <li>a. Type and quantity of grain received each calendar month, and the mode by which it was received (i.e., railcar, barge, truck);</li> <li>b. Type and quantity of grain shipped each calendar month, and the mode by which it was shipped (i.e., railcar, ship, truck);</li> <li>c. Quantity of dust/screenings material loaded to trucks each calendar month;</li> <li>d. Quantity of mineral oil applied to grain each calendar month;</li> <li>e. Average rate at which mineral oil was applied to grain (qtr./1,000 but);</li> <li>f. Type and quantity of grain shipped each calendar month to which mineral oil was not applied. For shipments which a customer specified that no mineral oil be applied to the grain, records shall include documentation of the specification precluding mineral oil application;</li> <li>g. Results of semi-monthly visible emissions observations for ship loading; and</li> <li>h. Estimated facilitywide emissions for each calendar month.</li> </ul>	1-49

No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity
38.	<p>The following information shall be recorded for each dust collector at the intervals specified below, and kept readily available on-site for inspection:</p> <ol style="list-style-type: none"> <li>Maintenance activities, process upsets, and equipment upsets or breakdowns shall be recorded for each occurrence;</li> <li>Differential pressure across the filtration media in each operating dust collector shall be recorded weekly. If a dust collector is not in operation during the week, a record shall be made to that effect; and</li> <li>Hours of operation for each dust collector shall be recorded monthly.</li> </ol>	1-2, 4, 6, 8-11, 13-15, 18-49

#### 2.4 Emission Monitoring and Testing Requirements

No.	Emission Monitoring and Testing Requirements	Equipment/ Activity
39.	<p>The following sets of visible emissions observations during ship loading operations shall be collected, recorded at the intervals specified below, and readily available on-site for inspection:</p> <ol style="list-style-type: none"> <li>30 minutes of visible emission observations of ship loading during initial fill shall 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 shall 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 shall 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 shall be taken across the top of a ship hold during active loading. If cement holes are in use during the observation period, observations shall be made at an associated hold vent. During any monthly period in which no ships are loaded, a record shall be made to that effect and the record shall satisfy the observation requirement.</p>	16
40.	<p>Emission testing of the following dust collectors shall be performed no later than October 31, 2015. Subsequent emission testing shall be conducted on a rolling 10 year basis, no later than October of year in which testing is due. Emission testing shall be conducted in accordance with Appendix A of this permit.</p> <ul style="list-style-type: none"> <li>• Baghouse E</li> <li>• Baghouse J</li> <li>• Baghouse N</li> <li>• Filter DS100</li> <li>• Filter DS751</li> <li>• Filter DS754</li> </ul>	1, 4, 6, 11, 45-46

No.	Emission Monitoring and Testing Requirements	Equipment/ Activity
41.	<p>Emission testing of the following dust collectors shall be performed no later than October 31, 2016. Subsequent emission testing shall be conducted on a rolling 10 year basis, no later than October of year in which testing is due. Emission testing shall be conducted in accordance with Appendix A of this permit.</p> <ul style="list-style-type: none"> <li>• Filter DS401</li> <li>• Filter DS402</li> <li>• Filter DS403</li> <li>• Filter DS404</li> <li>• Filter DS415A</li> <li>• Filter DS415B</li> <li>• Filter DS415C</li> <li>• Filter DS552</li> <li>• Filter DS560</li> <li>• Filter DS601A</li> <li>• Filter DS602A</li> </ul>	33-39, 41, 43
42.	<p>Emission testing of the following dust collectors shall be performed no later than October 31, 2017. Subsequent emission testing shall be conducted on a rolling 10 year basis, no later than October of year in which testing is due. Emission testing shall be conducted in accordance with Appendix A of this permit.</p> <ul style="list-style-type: none"> <li>• Baghouse B</li> <li>• Baghouse F</li> <li>• Baghouse H</li> <li>• Baghouse P</li> <li>• Filter DS715A</li> <li>• Filter DS715B</li> <li>• Filter DS715C</li> <li>• Filter DS701</li> </ul>	8-10, 15 44, 49
43.	<p>Emission testing of the following dust collectors shall be performed no later than October 31, 2018. Subsequent emission testing shall be conducted on a rolling 10 year basis, no later than October of year in which testing is due. Emission testing shall be conducted in accordance with Appendix A of this permit.</p> <ul style="list-style-type: none"> <li>• Baghouse A</li> <li>• Filter DS202</li> <li>• Filter DS221</li> <li>• Filter DS222</li> <li>• Filter DS230A</li> <li>• Filter DS230B</li> <li>• Filter DS241</li> <li>• Filter DS243</li> <li>• Filter DS301</li> <li>• Filter DS331</li> <li>• Filter DS341</li> <li>• Filter DS370</li> </ul>	13-14, 23-31, 48
44.	<p>Emission testing of the following dust collectors shall be performed no later than October 31, 2019. Subsequent emission testing shall be conducted on a rolling 10 year basis, no later than October of year in which testing is due. Emission testing shall be conducted in accordance with Appendix A of this permit.</p> <ul style="list-style-type: none"> <li>• Baghouse D</li> <li>• Filter DS101A</li> <li>• Filter DS101</li> <li>• Filter DS110</li> <li>• Filter DS120</li> <li>• Filter DS121</li> <li>• Filter DS358</li> <li>• Filter DS757</li> </ul>	2, 18-22, 32, 47

No.	Emission Monitoring and Testing Requirements	Equipment/ Activity
45.	<p>Emission testing of the following fugitive emission sources shall be performed no later than October 31, 2015. Subsequent emission testing shall be conducted on a rolling 10 year basis, no later than October of year in which testing is due. Emission testing shall be conducted in accordance with Appendix B of this permit.</p> <ul style="list-style-type: none"> <li>• Grain Receiving – Barge</li> <li>• Grain Receiving – Truck</li> <li>• Grain Receiving – Railcar Pit 2</li> <li>• Grain Receiving – Railcar Pit 3</li> <li>• Grain Loading – Ship</li> </ul>	3, 5, 7, 16
46.	<p>Emission testing of the following fugitive emission sources shall be performed no later than October 31, 2016. Subsequent emission testing shall be conducted on a rolling 10 year basis, no later than October of year in which testing is due. Emission testing shall be conducted in accordance with Appendix B of this permit.</p> <ul style="list-style-type: none"> <li>• Screenings/Dust Loading – Loadout Station #2</li> </ul>	37
47.	<p>Emission testing of the following fugitive emission sources shall be performed no later than October 31, 2017. Subsequent emission testing shall be conducted on a rolling 10 year basis, no later than October of year in which testing is due. Emission testing shall be conducted in accordance with Appendix B of this permit.</p> <ul style="list-style-type: none"> <li>• Grain Loading – Loadout Station #1</li> </ul>	44
48.	<p>Emission testing of the following fugitive emission sources shall be performed no later than October 31, 2019. Subsequent emission testing shall be conducted on a rolling 10 year basis, no later than October of year in which testing is due. Emission testing shall be conducted in accordance with Appendix B of this permit.</p> <ul style="list-style-type: none"> <li>• Grain Loading – Railcar</li> <li>• Grain Receiving – Railcar Pit 1</li> </ul>	3, 12

## 2.5 Reporting Requirements

No.	Reporting Requirements	Equipment/ Activity
49.	All air quality related complaints received by the permittee shall be reported to SWCAA within three days of receipt.	Facilitywide
50.	<p>Excess emissions shall be reported to SWCAA as follows:</p> <ul style="list-style-type: none"> <li>• As soon as possible, but no later than 12 hours after discovery for emissions that represent a potential threat to human health or safety;</li> <li>• 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</li> <li>• No later than 30 days after the end of the month of discovery for all other excess emissions.</li> </ul>	Facilitywide
51.	For shipments for which a customer has specified that no oil be applied to the grain, the Permittee shall notify SWCAA prior to loading unoiled grain to railcars.	12

No.	Reporting Requirements	Equipment/ Activity
52.	<p>The following operational information shall be reported to SWCAA in writing no later than September 15<sup>th</sup> and March 15<sup>th</sup> respectively for the previous semi-annual calendar period (January to June, July to December):</p> <ol style="list-style-type: none"> <li>Type and quantity of grain received each calendar month, and the mode by which it was received (i.e., railcar, barge, truck);</li> <li>Type and quantity of grain shipped each calendar month, and the mode by which it was shipped (i.e., railcar, barge, truck);</li> <li>Quantity of dust/screenings material shipped each calendar month;</li> <li>Hours of operation for each dust collector each calendar month;</li> <li>Quantity of oil applied to grain each calendar month;</li> <li>Average rate at which oil was applied to grain (qt/1000 bu);</li> <li>Type and quantity of grain shipped each calendar month to which oil was not applied;</li> <li>Copies of opacity certification for each onsite personnel making visible emissions observations; and</li> <li>Results of semi-monthly visible emissions observations for ship loading; and</li> <li>Estimated air emissions for each calendar month.</li> </ol>	1-49
53.	<p>A written emissions inventory report shall be submitted to SWCAA by March 15 for the previous calendar year in accordance with SWCAA 400-105(1). The report shall contain, at a minimum:</p> <ol style="list-style-type: none"> <li>Total quantity of grain received, and the mode by which it was received;</li> <li>Total quantity of grain shipped, and the mode by which it was shipped;</li> <li>Total hours of operation of each dust collection unit; and</li> <li>Estimated air emissions from the facility.</li> </ol>	1-49
54.	Emission test results shall be reported to SWCAA in writing within 45 days of test completion.	1-49
55.	Initial start-up of approved emission units shall be reported to SWCAA in writing within 10 days of occurrence.	8, 13

### 3. General Provisions

No.	General Provisions
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.

No.	General Provisions
E.	This Permit will be invalid if construction has not commenced within eighteen (18) months from date of issuance, if construction is discontinued for a period of eighteen (18) months or more, 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 70.94, 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 70.94 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.



**Air Discharge Permit 18-3262 - Appendix A**  
**Emission Testing Requirements**  
**Dust Collection Units**

**1. Introduction:**

The purpose of emission testing is to quantify emissions from affected dust collection units and confirm compliance with the requirements of 40 CFR 60 Subpart DD (NSPS) and this permit.

The following units are subject to New Source Performance Standards (NSPS) 40 CFR 60 Subpart DD:

- Baghouse A
- Baghouse B
- Baghouse D
- Baghouse F
- Baghouse H
- Baghouse J
- Baghouse P
- Filter DS100
- Filter DS101
- Filter DS101A
- Filter DS110
- Filter DS120
- Filter DS121
- Filter DS202
- Filter DS221
- Filter DS222
- Filter DS230A
- Filter DS230B
- Filter DS241
- Filter DS243
- Filter DS301
- Filter DS331
- Filter DS341
- Filter DS358
- Filter DS370
- Filter DS415A
- Filter DS415B
- Filter DS415C
- Filter DS552
- Filter DS560
- Filter DS601A
- Filter DS602A
- Filter DS701
- Filter DS715A
- Filter DS715B
- Filter DS715C
- Filter DS751
- Filter DS754
- Filter DS757

The following units are not subject to Subpart DD:

- Baghouse E
- Baghouse N
- Filter DS401
- Filter DS402
- Filter DS403
- Filter DS404

**2. Test Requirements:**

- a. **Test Notification.** For initial emission tests on any unit subject to 40 CFR 60 Subpart DD, SWCAA shall be notified a minimum of 30 calendar days prior to the proposed test date. For all other emission tests (initial and periodic), SWCAA shall be notified a minimum of 5 calendar days prior to the proposed test date.

**Air Discharge Permit 18-3262 - Appendix A**  
**Emission Testing Requirements**  
**Dust Collection Units**

**2. Test Requirements (con't):**

- b. **Test Plan.** A comprehensive test plan shall be submitted to SWCAA for review and approval at least 14 calendar days prior to the proposed test date.
- c. **Test Location.** Unless otherwise specified in writing by SWCAA, emission testing shall be performed at the exhaust air outlet of the affected dust collector for all constituents.
- d. **Test Constituents/Methods.** The constituents and test methods identified below shall be used to perform emission testing. The Permittee may propose the use of alternative test methods by submitting a written request to SWCAA. SWCAA will review such a request, and provide the Permittee with a written determination approving/disapproving use of the proposed test methods.

<u>Constituent</u>	<u>Reference Test Method</u>
Volumetric flow rate, gas velocity/temperature	EPA Methods 1 and 2
Moisture content	EPA Method 4
Particulate Matter (PM)	EPA Method 5 or 17
Opacity (Initial tests on NSPS sources)	EPA Method 9
(All other tests)	SWCAA Method 9

**e. Test Runs/Duration.**

- (1) Initial Emission Tests for PM.  
Initial emission tests for PM shall include a minimum of 3 1-hour test runs, performed at maximum expected throughput or process operating conditions.
  - (2) Initial Emission Tests for Visible Emissions.
    - (A) For sources subject to Subpart DD, initial emission tests for visible emissions shall include a minimum of 3 1-hour test runs, performed concurrently with each run of PM testing as per 40 CFR 60.11(b).
    - (B) For sources not subject to Subpart DD, initial emission tests for visible emissions shall include a minimum of 3 6-minute test runs, performed concurrently with each run of PM testing. If any individual reading of visible emissions during a run is above the applicable emission limit, then an additional 6 minutes of readings shall be taken. The total readings taken during a run shall not exceed 1 hour.
  - (3) Periodic Emission Tests for PM.  
Periodic emission tests for PM shall include a minimum of 3 1-hour test runs, performed at maximum expected throughput or process operating conditions.
  - (4) Periodic Emission Tests for Visible Emissions.  
Periodic emission tests for visible emissions shall include a minimum of 3 6-minute test runs, performed concurrently with each PM test run. If any individual reading of visible emissions during a run is above the applicable emission limit, then an additional 6 minutes of readings shall be taken. The total readings taken during a run shall not exceed 1 hour.
- f. **Test Records.** A complete record of production related parameters, process start ups, shutdowns, and adjustments shall be kept during emissions testing to correlate operations with emissions and shall be recorded in the test results final report.

**3. Source Operation:**

Source operations during emissions testing shall be representative of maximum intended operating conditions.

**Air Discharge Permit 18-3262 - Appendix A**  
**Emission Testing Requirements**  
**Dust Collection Units**

**4. Reporting Requirements:**

A final test report shall be prepared and submitted to SWCAA within 45 calendar days of test completion in both hardcopy and electronic format (PDF or similar). Test reports shall, at a minimum, 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.
- 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 (if applicable).
- j. Calibration documentation.
- k. Discussion of any abnormalities associated with the results.
- l. A statement signed by the senior management official of the testing firm certifying the validity of the source test report.

**Air Discharge Permit 18-3262 - Appendix B**  
**Emission Testing Requirements**  
**Fugitive Dust Sources**

**1. Introduction:**

The purpose of emission testing is to quantify emissions from affected fugitive dust sources, and confirm compliance with the requirements of 40 CFR 60 Subpart DD (NSPS) and this permit.

The following fugitive sources are subject to 40 CFR 60 Subpart DD:

- Grain Receiving - Barge
- Grain Receiving - Railcar Pit 1
- Grain Receiving - Railcar Pit 3
- Loadout Station #1
- Loadout Station #2
- Grain Loading - Ship

The following fugitive sources are not subject to 40 CFR 60 Subpart DD:

- Grain Receiving - Rail Pit 2
- Grain Receiving - Truck
- Grain Loading - Railcar

**2. Test Requirements:**

- a. **Test Notification.** For initial emission tests on any unit subject to 40 CFR 60 Subpart DD, SWCAA shall be notified a minimum of 30 calendar days prior to the proposed test date. For all other emission tests (initial and periodic), SWCAA shall be notified a minimum of 5 calendar days prior to the proposed test date.
- b. **Test Plan.** A comprehensive test plan shall be submitted to SWCAA for review and approval at least 14 calendar days prior to the proposed test date.
- c. **Test Location.** Unless otherwise specified in writing by SWCAA, testing shall be performed at the following locations:
  - (1) Grain Receiving - Railcar: Entrance and exit of associated railcar shed while unloading grain.
  - (2) Grain Receiving - Barge: Top of sump cap while unloading grain.
  - (3) Grain Receiving - Truck: Top of receiving grate while unloading grain.
  - (4) Grain Loading - Ship: Top of hatch being loaded while loading grain.
  - (5) Grain Loading - Railcar: Top of railcar hatch being loaded while loading grain.
  - (6) Loadout Stations: Exterior of building envelope while loading grain/screenings.
- d. **Test Constituents/Methods.** The constituents and test methods identified below shall be used to perform emission testing. The Permittee may propose the use of alternative test methods by submitting a written request to SWCAA. SWCAA will review such a request, and provide the Permittee with a written determination approving/disapproving use of alternative test methods.

<u>Constituent</u>	<u>Reference Test Method</u>
Opacity (Initial tests on NSPS sources)	EPA Method 9
(All other tests)	SWCAA Method 9

**Air Discharge Permit 18-3262 - Appendix B**  
**Emission Testing Requirements**  
**Fugitive Dust Sources**

**2. Test Requirements (con't):**

**e. Test Runs/Duration.**

(1) Initial Emission Tests.

(A) For sources subject to Subpart DD, initial emission tests for visible emissions shall include a minimum of 3 1-hour test runs; and

(B) For sources not subject to Subpart DD, initial emission tests for visible emissions shall include:

(i) A minimum of 1 truck observed through the entire grain receiving process, or

(ii) A minimum of 30 minutes of observation for all other sources.

(2) Periodic Emission Tests. Periodic emission tests for visible emissions shall include:

(A) A minimum of 1 truck observed through the entire grain receiving process; or

(B) A minimum of 30 minutes of observation for all other sources.

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

**3. Source Operation:**

Source operations during emissions testing shall be representative of maximum expected operating conditions.

**4. Reporting Requirements**

A final test report shall be prepared and submitted to SWCAA within 45 calendar days of test completion in both hardcopy and electronic (pdf or similar) format and, at a minimum, shall 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;
- 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.

**Air Discharge Permit 18-3262 - Appendix C**  
**Compliance Demonstration Protocol**  
**Grain Loading to Ships and Railcars**

**1. Introduction:**

The purpose of this protocol is to identify the method by which the Permittee may demonstrate compliance with applicable emission limits while loading grain to ships and/or railcars without oil application or the additional control measures described in Requirement 32 of this permit. A successful compliance demonstration using this protocol shall allow the Permittee to load grain to ships or railcars without oil and/or additional control measures consistent with the demonstrated loading conditions.

**2. Compliance Demonstration Requirements:**

- a. **Notification.** SWCAA shall be notified in writing a minimum of 2 calendar days prior to the proposed demonstration date. The written notification shall include, at a minimum, the following information:
  - (1) Date and time of proposed demonstration;
  - (2) Type of vehicle to be loaded (ship, railcar);
  - (3) For ships, the loading mode to be used (open hold, cement hatch);
  - (4) Commodity to be loaded (grain type);
  - (5) Proposed rate of loading (tph); and
  - (6) Proposed rate of oil application, if any (qt/1,000 bu).
- b. **Test Location.** For ships, visual emission observations shall be made across the top of ship hold hatches during active grain loading. If a compliance demonstration is performed while using cement hatches, visual emission observations shall be made at an associated hatch vent. For railcars, visual emission observations shall be made at the top of the railcar being loaded.
- c. **Test Constituents/Methods.** Visual emission observations shall be performed by an independent third party in accordance with SWCAA Method 9.
- d. **Test Duration.** Each set of visual emission observations shall be a minimum of 60 consecutive minutes in length. In total, a minimum of 6 hours of visual emission observations shall be made in support of each compliance demonstration. For ship loading, at least 2 hours of the observations shall be made while loading grain in the 'topping off' mode.
- e. **Compliance Criteria.** If visual emission observations made in accordance with this protocol indicate that observed operations are in compliance with applicable emission limits, the Permittee shall then be allowed to ship load the grain in question without the additional control measures specified in Requirement 32 of this permit. Removal of control measures is limited to those measures not used in the associated compliance demonstration. Any control measures used in making the affected compliance demonstration must continued to be used until a successful demonstration is made without the control measures in question.

**Example.** Assume that pursuant to Requirement 32 the Permittee is required to apply oil at a rate of 6 qt/1000 bu and perform mechanical cleaning while loading wheat to ships. The Permittee then performs a successful compliance demonstration while loading wheat with no mechanical cleaning and an oil application rate of 3 qt/1000 bu. Subsequent to the demonstration, the Permittee would be allowed to load wheat to ships without mechanical cleaning at an oil application rate of 3 qt/1000 bu. A successful demonstration without oil or cleaning would allow the Permittee to cease using both control measures.

**3. Source Operation:**

A complete record of production related parameters, process start ups, shutdowns, and adjustments shall be kept while making visual observations and shall be recorded in the test results final report.

**Air Discharge Permit 18-3262 - Appendix C**  
**Compliance Demonstration Protocol**  
**Grain Loading to Ships and Railcars**

**4. Reporting Requirements**

The results of each compliance demonstration shall be submitted to SWCAA in writing within 5 calendar days of completing the demonstration. At a minimum, the following information shall be submitted:

- a. Date and time of compliance demonstration;
- b. Type of vehicle loaded (ship, railcar);
- c. For ships, the loading mode used (open hatch, cement hatch, etc.)
- d. Type of commodity loaded (grain);
- e. Rate of loading during demonstration (tph);
- f. Rate of oil application, if any, during demonstration (qt/1,000 bu); and
- g. Summary of production related parameters;
- h. Visual emission observation results; and
- i. Discussion of any abnormalities associated with the results.

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**State Environmental Policy Act**

**DETERMINATION OF SEPA EXEMPT - SWCAA 18-004**

**Description of proposal:**

ADP Application CO-978: The proposed project is limited to replacement of existing emission control equipment with new emission control equipment of similar type and configuration. This project is exempt from SEPA requirements pursuant to WAC 197-11-800(3) since it only involves repair, remodeling, maintenance, or minor alteration of existing structures, equipment or facilities, and does not involve material expansions or changes in use.

**Proponent:** TEMCO, LLC (Tom Rodman, Terminal Manager)

**Location of proposal, including street address if any:**  
400 Toteff Road, Kalama, Washington 98625

**Lead agency:** Southwest Clean Air Agency

The lead agency for this proposal has determined that the proposed project is exempt from SEPA under WAC 197-11-800(3) as follows: "The repair, remodeling, maintenance, or minor alteration of existing private or public structures, facilities or equipment, including utilities, recreation, and transportation facilities involving no material expansions or changes in use beyond that previously existing; ..." The proposed project is identified as maintenance of existing equipment and as such it does not have a probable significant impact on the environment. Neither an environmental checklist nor an environmental impact statement (EIS) is required under RCW 43.21C.030(2)(c). This decision was made by the lead agency after review of the proponent's proposal and the information on file with the lead agency. This information is available to the public on request.

This project/permitting action by SWCAA is SEPA exempt.

**Responsible official:** Paul T. Mairose, P.E.

**Position/title:** Chief Engineer

**Address:** Southwest Clean Air Agency  
11815 NE 99<sup>th</sup> St, Suite 1294  
Vancouver, WA 98682-2322

**Phone:** (360) 574-3058, ext 130

**Signature:** Paul T. Mairose

**Date:** 1/24/18

