

RE: AGP 23NOC1627 - Information Request

Josh Bartlett <jbartlett@anchorqea.com>

Thu 3/7/2024 1:14 PM

To: Chris Moelter <cmoelter@anchorqea.com>; Aaron Manley <aaron.manley@orca.org>
Cc: Jorgensen, Kelly <KJorgensen@agp.com>; Marker, Stewart <smarker@agp.com>; Kim Marcotte <kmarcotte@anchorqea.com>; Debbie Moody <debbie.moody@orca.org>

Aaron – I have uploaded modeling files for the new AERSCREEN scenarios to the SharePoint site we previously shared. I'll follow up this email with a direct share link to the new subfolder.

Josh

From: Chris Moelter <cmoelter@anchorqea.com>**Sent:** Thursday, March 7, 2024 4:04 PM**To:** Aaron Manley <aaron.manley@orca.org>**Cc:** Jorgensen, Kelly <KJorgensen@agp.com>; Marker, Stewart <smarker@agp.com>; Josh Bartlett <jbartlett@anchorqea.com>; Kim Marcotte <kmarcotte@anchorqea.com>; Debbie Moody <debbie.moody@orca.org>**Subject:** RE: AGP 23NOC1627 - Information Request

Good afternoon, Aaron.

Please find attached our response the questions/issued raised in your email dated 2/28. We have taken the liberty of providing a Word document, hopefully to make it easier to pull the information into the application as needed. A revised calculations table is also attached.

Please don't hesitate to let me know if you have any questions.

Kind regards,

Chris Moelter (he/him) | ANCHOR QEA, LLC

Senior Managing Environmental Planner

6720 SW Macadam Ave., Suite 300

Portland, OR 97219

D: 503.924.6195 / C: 503.347.9719

ANCHOR QEA, LLC

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From: Chris Moelter**Sent:** Wednesday, March 6, 2024 7:39 AM**To:** Aaron Manley <aaron.manley@orca.org>**Cc:** Jorgensen, Kelly <KJorgensen@agp.com>; Marker, Stewart <smarker@agp.com>; Josh Bartlett <jbartlett@anchorqea.com>; Kim Marcotte <kmarcotte@anchorqea.com>; Debbie Moody

<debbie.moody@orca.org>

Subject: RE: AGP 23NOC1627 - Information Request

Good morning Aaron, I just wanted to let you know that we're close to providing our response to your enquiry and hope to have more info for you in the coming days.

Chris Moelter (he/him) | ANCHOR QEA, LLC

Senior Managing Environmental Planner

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From: Chris Moelter

Sent: Thursday, February 29, 2024 9:59 AM

To: Aaron Manley <aaron.manley@orca.org>

Cc: Jorgensen, Kelly <KJorgensen@agp.com>; Marker, Stewart <smarker@agp.com>; Josh Bartlett <jbartlett@anchoragea.com>; Kim Marcotte <kmarcotte@anchoragea.com>; Debbie Moody <debbie.moody@orca.org>

Subject: RE: AGP 23NOC1627 - Information Request

Thank you for the email, Aaron. We'll get back to you soon regarding the questions on potential fugitive emissions.

Chris Moelter (he/him) | ANCHOR QEA, LLC

Senior Managing Environmental Planner

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From: Aaron Manley <aaron.manley@orca.org>

Sent: Wednesday, February 28, 2024 9:01 AM

To: Chris Moelter <cmoelter@anchoragea.com>

Cc: Jorgensen, Kelly <KJorgensen@agp.com>; Marker, Stewart <smarker@agp.com>; Josh Bartlett <jbartlett@anchoragea.com>; Kim Marcotte <kmarcotte@anchoragea.com>; Debbie Moody <debbie.moody@orca.org>

Subject: AGP 23NOC1627 - Information Request

Hello. I received back comments from ORCAA staff on the permit draft and answered the questions I could. There are a few items we need to resolve before we can issue the permit:

There are no fugitive emissions identified in the project application. The original Terminal 2 2002 NOC permit application accounted for the pneumatic system capture efficiency not being 100% and calculated fugitive emissions for railcar receiving activities and shiploading activities (assumed 90% capture/control efficiency for both).

-Is the railcar receiving enclosure sufficient to capture 100% of emissions and thus prevent fugitive emissions (i.e. will it be a 'total enclosure')? If not, we need to include fugitive emissions from receiving activities in the facility's PTE and ambient impacts analysis.

-The current permitting action needs to calculate PTE and evaluate fugitive emissions ambient impacts from ship loading operations.

PTE should consider PM, PM10, and PM2.5. The ambient impacts analysis needs to evaluate PM10 and PM2.5.

As a courtesy to expedite the process I'm attaching the calculations excel file for the T2 2002 permit (titled 'Grain 1'). ORCAA will accept these emissions factors for fugitive emissions from railcar unloading and shiploading, but if you have emissions factors you believe to be more representative you can make a case and we'll review.

When I receive your response I'll incorporate the changes, send the permit draft back to the head engineer for review, then when they're satisfied with the draft I'll send you an applicant review draft for your comments. Feel free to contact me with any questions.

Sincerely,

Aaron Manley, P.E.

Engineer II

+++++

Olympic Region Clean Air Agency

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[Olympia, WA 98502](#)

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