

AGP Terminal 4 Commodity Transload Facility - AGP 23NOC1627

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 1 attachments (14 KB)

Shiploader Sensitivity.xlsx;

Dear Mr. Manley,

On behalf of Ag Processing (AGP), thank you for the opportunity to review and comment on the draft permit 23NOC1627 for the AGP commodity transload facility at Terminal 4 (T4) of the Port of Grays Harbor and for taking the time to discuss our questions and comments on the draft permit on Thursday, April 4.

Following the call, one issue remains that we would like to see resolved with the draft permit—the 5% opacity limit imposed on the shiploader. As discussed during the call, ORCAA arrived at this proposed opacity limit by scaling down the 20% opacity limit for the Terminal 2 (T2) shiploader to account for the difference in capture efficiencies assumed by ORCAA. In fact, the AGP shiploader at T2 utilizes the same capture technology as is proposed for the T4 facility, so there is no difference in capture efficiency between the two operations.

We agree with ORCAA that a 20% opacity limit is appropriate for the ship loading operation during all stages of the loading operation, but we assert that the 98% capture efficiency supplied in the application is more appropriate than the 90% previously used by ORCAA. While it is difficult to find direct capture efficiency guarantees or scientific research for this control equipment, our estimate of 98% total capture was based on several Southwest Clean Air Agency (SWCAA) technical support documents for grain terminal ship loaders, including the TEMCO facility in Kalama, WA¹, for example. We attributed 80% capture to the choked flow and skirt technologies employed in the loading spout, coupled with 90% capture of the remaining emissions to the active aspiration, for a total capture efficiency of 98%.

This same control technology at T2 results in occasional opacity readings above 5% or 10%, even when operating as intended. As noted during the call, the ORCAA inspector for the T2 facility agreed that 20% was an appropriate limit for that activity. The T4 shiploader will have a higher throughput than T2. This is an important factor that is not considered when the opacity limit is scaled proportionately with capture efficiency. This throughput increase is reflected in the fugitive emission rate, which would be a more obvious corollary to opacity than the capture efficiency, which has no particular basis.

The question of capture efficiency also impacts the total potential to emit (PTE) and ambient air quality impacts for the proposed facility. While we do not agree that fugitive emissions should contribute to Title V PTE thresholds for this facility, we have completed a sensitivity analysis to determine the magnitude of these impacts relative to important thresholds. This was done by quintupling emissions and maximum ambient concentrations of PM10 and PM2.5 resulting from shiploader fugitives. The results of this analysis are attached. To summarize, even with a capture efficiency of 90% (the default assumed by ORCAA), there would be no threat to the NAAQS from the T4 facility or to Title V emission thresholds for the combined T2 and T4 facility emissions.

As a result, AGP requests that the opacity limit be raised to 20% for all ship loading operations at the T4 facility prior to issuance and that the associated capture technology be credited with 98% capture.

Thank you for your time and consideration. Please let me know if you have any questions or would like to discuss this further.

Supporting Note 1: Technical Support Document 22-3535TSD, Air Discharge Permit ADP 22-3535, Issued: August 10, 2022. TEMCO, LLC. Available at <https://www.swcleanair.gov/docs/permits/Final/22-3535TSD.pdf>. Date accessed: April 8, 2024.

Kind regards,

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