

AGP 23NOC1627 - Information Request

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 1 attachments (20 KB)

Grain1.xls;

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

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