

RE: AGP 23NOC1627 For Applicant Review and Comment Period Required

Chris Moelter <cmoelter@anchorqea.com>

Mon 4/1/2024 3:56 PM

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

Cc: Jennifer DeMay <jennifer.demay@orcaa.org>; Mike Shults <mike.shults@orcaa.org>; Josh Bartlett <jbartlett@anchorqea.com>; Marker, Stewart <smarker@agp.com>; Jorgensen, Kelly <KJorgensen@agp.com>

Thank you, Aaron. I'll send out a meeting invite shortly.

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: Aaron Manley <aaron.manley@orcaa.org>**Sent:** Monday, April 1, 2024 1:58 PM**To:** Chris Moelter <cmoelter@anchorqea.com>**Cc:** Jennifer DeMay <jennifer.demay@orcaa.org>; Mike Shults <mike.shults@orcaa.org>; Josh Bartlett <jbartlett@anchorqea.com>; Marker, Stewart <smarker@agp.com>; Jorgensen, Kelly <KJorgensen@agp.com>**Subject:** Re: AGP 23NOC1627 For Applicant Review and Comment Period Required

Hi, Chris. We can meet Thursday at 11.

Thank you,

Aaron Manley, P.E.

Engineer II

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Olympic Region Clean Air Agency-----
[2940 Limited Lane NW](#)[Olympia, WA 98502](#)[\(360\) 539-7610 x 104](#)www.orcaa.org

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From: Chris Moelter <cmoelter@anchoragea.com>

Sent: Monday, April 1, 2024 1:40 PM

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

Cc: Jennifer DeMay <jennifer.demay@orca.org>; Mike Shults <mike.shults@orca.org>; Josh Bartlett <jbartlett@anchoragea.com>; Marker, Stewart <smarker@agp.com>; Jorgensen, Kelly <KJorgensen@agp.com>

Subject: RE: AGP 23NOC1627 For Applicant Review and Comment Period Required

Hi Aaron,

Are you and Jennifer available for a call mid-week? We would like ask a couple questions about the consideration of fugitive emissions. AGP and Anchor can be available at the following days/times, please let me know which of these work for you and Jennifer and I'll be happy to schedule a meeting. Thank you!

- Wed, 4/3
 - 9:30 – 10
 - 10 – 10:30
 - 10:30 – 11
 - 12 – 12:30
 - 12:30 – 1
 - 1 – 1:30
 - 1:30 – 2
 - 2 – 2:30
- Thurs, 4/4
 - 11 – 11:30
 - 11:30 – 12
 - 1:30 – 2
 - 2 – 2:30

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

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

Sent: Wednesday, March 20, 2024 4:17 PM

To: Jorgensen, Kelly <KJorgensen@agp.com>

Cc: Chris Moelter <cmoelter@anchoragea.com>; Jennifer DeMay <jennifer.demay@orca.org>; Mike Shults

<mike.shults@orcaa.org>

Subject: Re: AGP 23NOC1627 For Applicant Review and Comment Period Required

Hello. It was nice talking with you this morning. I discussed your questions/concerns with my supervisor, Jennifer DeMay, and ORCAA staff have the following responses:

Question: Is there anything that can be done about the public noticing period? The facility triggers mandatory public commenting because of fugitive PM emissions. AGP hasn't had to do this at the T2 facility previously and would prefer consistent regulatory oversight. WAC 173-400-810 and 820 appear to exempt fugitives from PTE calculations. Does the exemption apply in this case?

Response: WAC 173-400-810 and 820 pertain to major stationary sources in nonattainment areas. Your facility is not subject to major new source review but is subject to minor new source review under WAC 173-400-110 and ORCAA Rule 6.1. Under minor new source review, a 30-day public commenting period is required if there is an increase in emissions over thresholds in Table 6.1a of ORCAA Rule 6.1. All emissions including fugitives are included in minor new source review. In addition, we discussed the issue of public noticing with our Executive Director and he stated that there has been substantial public interest in the facility and he has determined that public notice would also be triggered under ORCAA Rule 6.1.3(b)(5).

Question: Can anything be done about the 5% BACT opacity limit for shiploading operations? AGP anticipates opacity being much lower than 20%, but 5% may be difficult to achieve at times. The T2 facility is almost identical and has a 20% opacity limit for shiploading operations. The 20% limit comes from Subpart DD's barge and shiploading opacity regulation.

Response: We based the 5% opacity limit on the permit application addendum that stated the capture efficiency of the shiploading operations were projected to be 98% consistent with railcar loading operations. In a discussion with our Compliance Manager, Mike Shults, he stated that he felt that the 98% capture efficiency was not representative of shiploading capture efficiency unless the design of the proposed shiploading operation is significantly different than the T2 facility. In comparison, a 90% capture efficiency was used for emission calculations from shiploading operations at the T2 facility. If the proposed T4 shiploading operations are identical to the existing T2 facility, it sounds like the 98% capture efficiency is in error. If that is the case, please submit an addendum to your application including the correct capture efficiency, revised emissions calculations, and revised NAAQS analysis.

Please let me know if you have any questions or would like to meet to discuss this further.

Sincerely,

Aaron Manley, P.E.

Engineer II

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

Sent: Friday, March 15, 2024 1:57 PM

To: Jorgensen, Kelly <KJorgensen@agp.com>; Marker, Stewart <smarker@agp.com>

Cc: Josh Bartlett <jbartlett@anchorgea.com>; Chris Moelter <cmoelter@anchorgea.com>; Debbie Moody <debbie.moody@orcaa.org>; Jennifer DeMay <jennifer.demay@orcaa.org>

Subject: AGP 23NOC1627 For Applicant Review and Comment Period Required

Hello, Kelly. I'm attaching the applicant review copy of your NOC permit. Please pay special attention to the Conditions of Approval on pages 22-26, as they will be permanent once the NOC is finalized. I'm available to discuss any permit questions you may have. If you wish to change the conditions after the permit is finalized, it will require a new NOC along with additional charges, so be sure you understand the permit conditions.

After reviewing the updated Potential to Emit (PTE) associated with fugitive PM emissions, **ORCAA staff determined this application triggers a mandatory 30-day public comment period in accordance with the requirements of ORCAA Rule 6.1.3(b)(1)** as the proposed project causes a significant net increase in emissions of PM (a PTE greater than 25 tons per year PM).

The sooner we receive and address your comments (if any), the sooner we can start the public commenting period. When we address the outcome of the public commenting period, we can print and finalize the permit.

Please provide your comments or let us know if you agree with the conditions so we can begin the public commenting process. Feel free to contact me with any questions.

Sincerely,

Aaron Manley, P.E.

Engineer II

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