

Notice of Construction Application

A notice of construction permit is required before installing a new source of air pollution or modifying an existing source of air pollution. This application applies to facilities in Ecology's jurisdiction. Submit this application for review of your project. For general information about completing the application, refer to Ecology Forms ECY 070-410a-g, "Instructions for Ecology's Notice of Construction Application."

Ecology offers up to two hours of free pre-application assistance. We encourage you to schedule a pre-application meeting with the contact person specified for the location of your proposal, below. If you use up your two hours of free pre-application assistance, we will continue to assist you after you submit Part 1 of the application and the application fee. You may schedule a meeting with us at any point in the process.

Upon completion of the application, please enclose a check for the initial fee and mail to:

Department of Ecology
Cashiering Unit
PO Box 47611
Olympia, WA 98504-7611

For Fiscal Office Use Only: 0299-3030404-B00-216--001--000404

Check the box for the location of your proposal. For assistance, call the appropriate office listed below:

Check box	Ecology Permitting Office	Contact
<input type="checkbox"/>	Chelan, Douglas, Kittitas, Klickitat, or Okanogan County Ecology Central Regional Office (509) 575-2490	Lynnette Haller (509) 457-7126 lynnette.haller@ecy.wa.gov
<input checked="" type="checkbox"/>	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Stevens, Walla Walla, or Whitman County Ecology Eastern Regional Office (509) 329-3400	Karin Baldwin (509) 329-3452 karin.baldwin@ecy.wa.gov
<input type="checkbox"/>	San Juan County Ecology Northwest Regional Office (206) 594-0000	David Adler (425) 649-7267 david.adler@ecy.wa.gov
<input type="checkbox"/>	For actions taken at Kraft and Sulfite Paper Mills and Aluminum Smelters Only Ecology Industrial Section (360) 407-6900	James DeMay (360) 407-6868 james.demay@ecy.wa.gov
<input type="checkbox"/>	For actions taken on the US Department of Energy Hanford Reservation Only Ecology Nuclear Waste Program (509) 372-7950	Lilyann Murphy (509) 372-7951 lilyann.murphy@ecy.wa.gov

1650 Dept of Ecology
 Const. in Progress ~~\$1,904.00~~ \$1,904.00 ✓
 8/8/24
 ck# 14925
 461X2588
 AUG 15 2024

Check the box below for the fee that applies to your application.

New project or equipment:

- \$1,904: Basic project** initial fee covers up to 16 hours of review.
- \$12,614: Complex project** initial fee covers up to 106 hours of review.

Change to an existing permit or equipment:

- \$357: Administrative or simple change** initial fee covers up to 3 hours of review. Ecology may determine your change is complex during the completeness review of your application. If you project is complex, you must pay the additional xxx before we will continue working on your application
- \$1,190: Complex change** initial fee covers up to 10 hours of review
- \$350 flat fee:** Replace or alter control technology equipment under WAC 173-400-114. Ecology will contact you if we determine your change belongs in another fee category. You must pay the fee associated with that category before we will continue working on your application.

Read each statement below, then check the box next to it to acknowledge that you agree.

- The initial fee you submitted may not cover the cost of processing your application. Ecology will track the number of hours spent on your project. If the number of hours Ecology spends exceeds the hours included in your initial fee, Ecology will bill you \$119 per hour for the extra time.
- You must include all information requested by this application. Ecology may not process your application if it does not include all the information requested.
- Submittal of this application allows Ecology staff to visit and inspect your facility.

Part 1: General Information

I. Project, Facility, and Company Information

1. Project Name: Uniontown Grain Storage Pile
2. Facility Name: Uniontown Cooperative Association
3. Facility Street Address: 101 E Owen Steet, Uniontown, WA 99179-0127
4. Facility Legal Description: Township 12N, Range 46E, Section 6-7
5. Company Legal Name (if different from Facility Name): Uniontown CoOp
6. Company Mailing Address (street, city, state, zip): POB 127, Uniontown, WA 99179

II. Contact Information and Certification

1. Facility Contact Name (who will be onsite): POC: Garrett Eglad
2. Facility Contact Mailing Address (if different than Company Mailing Address): n/a
3. Facility Contact Phone Number: Uniontown CoOp Office, (509) 229-3828
4. Facility Contact E-mail: Garrett Eglad, garrett@uniontowncoop.com
5. Billing Contact Name (who should receive billing information): POC: Garrett Eglad
6. Billing Contact Mailing Address (if different Company Mailing Address): n/a

7. Billing contact Phone Number: (509) 229-3828
8. Billing Contact E-mail: garrett@uniontowncoop.com
9. Consultant Name (optional – if 3rd party hired to complete application elements): Scott Somers
10. Consultant Organization/Company: ID1, Inc.
11. Consultant Mailing Address (street, city, state, zip): 1351 Hains Avenue, Richland, WA 99354
12. Consultant Phone Number: (509) 539-5094
13. Consultant E-mail: srsomers22@gmail.com
14. Responsible Official Name and Title: Garrett Eglund, CEO Uniontown CoOp
15. Responsible Official Phone: (509) 229-3828
16. Responsible Official E-mail: garrett@uniontowncoop.com
17. Responsible Official Certification and Signature:

I certify that the information on this application is accurate and complete.

Signature:  Date: 8/8/24

Part 2: Technical Information

The Technical Information may be sent with this application form to the Cashiering Unit, or may be sent directly to the Ecology regional office with jurisdiction along with a copy of this application form.

For all sections, check the box next to each item as you complete it.

III. Project Description

- Written narrative describing your proposed project.
- Projected construction start and completion dates.
- Operating schedule and production rates.
- List of all major process equipment and manufacturer and maximum rated capacity.
- Process flow diagram with all emission points identified.
- Plan view site map.
- Manufacturer specification sheets for major process equipment components
- Manufacturer specification sheets for pollution control equipment.
- Fuel specifications, including type, consumption (per hour and per year) and percent sulfur.

IV. State Environmental Policy Act (SEPA) Compliance

Check the appropriate box below.

- SEPA review is complete. Include a copy of the final SEPA checklist and SEPA determination (e.g., DNS, MDNS, and EIS) with your application.
- SEPA review has not been conducted:
 - If review will be conducted by another agency, list the agency. You must provide a copy of the final SEPA checklist and SEPA determination before Ecology will issue your permit.
Agency reviewing SEPA: _____
 - If the review will be conducted by Ecology, fill out a SEPA checklist and submit it with your application. You can find a SEPA checklist online at <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-document-templates>

V. Emissions Estimations of Criteria Pollutants

Does your project generate criteria air pollutant emissions? Yes No

If yes, please provide the following information regarding your criteria emissions in the application.

- The names of the criteria air pollutants emitted (i.e., NO_x, SO₂, CO, PM_{2.5}, PM₁₀, TSP, VOC, and Pb)
- Potential emissions of criteria air pollutants in tons per hour, tons per day, and tons per year (include calculations)
- If there will be any fugitive criteria pollutant emissions, clearly identify the pollutant and quantity

VI. Emissions Estimations of Toxic Air Pollutants

Does your project generate toxic air pollutant emissions? Yes No

If yes, please provide the following information regarding your toxic air pollutant emissions in your application.

- The names of the toxic air pollutants emitted (specified in WAC 173-460-150¹)
- Potential emissions of toxic air pollutants in pounds per hour, pounds per day, and pounds per year (include calculations)
- If there will be any fugitive toxic air pollutant emissions, clearly identify the pollutant and quantity

VII. Emission Standard Compliance

- Provide a list of all applicable new source performance standards, national emission standards for hazardous air pollutants, national emission standards for hazardous air pollutants for source categories, and emission standards adopted under Chapter 70A.15 RCW.

Does your project comply with all applicable standards identified? Yes No

VIII. Best Available Control Technology

- Provide a complete evaluation of Best Available Control Technology (BACT) for your proposal.

IX. Ambient Air Impacts Analyses

Please provide the following:

- Ambient air impacts analyses for Criteria Air Pollutants (including fugitive emissions)
- Ambient air impacts analyses for Toxic Air Pollutants (including fugitive emissions)
- Discharge point data for each point included in air impacts analyses (include only if modeling is required)
 - Exhaust height
 - Exhaust inside dimensions (ex. diameter or length and width)
 - Exhaust gas velocity or volumetric flow rate
 - Exhaust gas exit temperature
 - The volumetric flow rate
 - Description of the discharges (i.e., vertically or horizontally) and whether there are any obstructions (ex., raincap)
 - Identification of the emission unit(s) discharging from the point
 - The distance from the stack to the nearest property line
 - Emission unit building height, width, and length
 - Height of tallest building on-site or in the vicinity and the nearest distance of that building to the exhaust
 - Whether the facility is in an urban or rural location

Does your project cause or contribute to a violation of any ambient air quality standard or acceptable source impact level? Yes No

To request ADA accommodation, call Ecology at (360) 407-6800, 711 (relay service), or (877) 833-6341 (TTY)

Part 2: Technical Information

The Technical Information may be sent with this application form to the Cashiering Unit, or may be sent directly to the Ecology regional office with jurisdiction along with a copy of this application form.

For all sections, check the box next to each item as you complete it.

III. Project Description

Please attach the following to your application.

Written narrative describing your proposed project.

Uniontown Cooperative Association continues to provide grain storage operations to the local farming community. This NOC is for an onsite, outdoor grain storage pile to collect the overburden of grains harvested within the local area. The temporary grain storage pile will be constructed in a similar manner as others within the area using tried methods and contractors. The pile will house 1.8MBu and measures 320' diameter and 70' high. Expectation are that use times will be July thru August, and removed prior to rain/snow months. This project will be managed by Garrett Eglund/Uniontown CoOp CEO.

The grain pile will consist of a ~320-foot circular base, rimmed with one or two sets of ecology blocks (~6-feet high max) and has a designed storage of 1.8Mbu. Inbound trucks will consist of 90% hopper and 10% rear dumping trucks. Off-loaded grain falls into a receiver pit with integrated baffles, and conveyed upward to the baffled center post. The center post is 73-feet high where the grain free-falls and exits through baffles to form the conical pile. The pile is either removed prior to seasonal weather or covered with a geomembrane and managed in-place. Removal of the pile is performed by front-end loader and 100% hopper trucks.

Projected construction start and completion dates.

Uniontown expects to have construction completed 2024 and accept grain for the 2025 season.

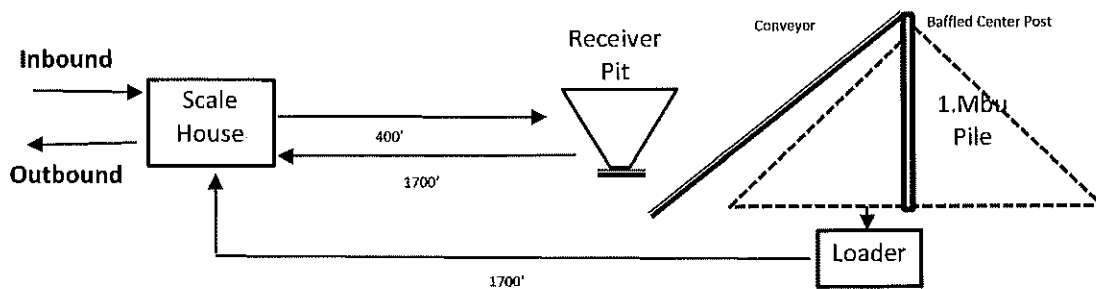
Operating schedule and production rates.

Uniontown grain pile will be used as a temporary collection and storage point. Grain will be delivered from early July-August; unloading from September-October, then idle for the remainder of the year.

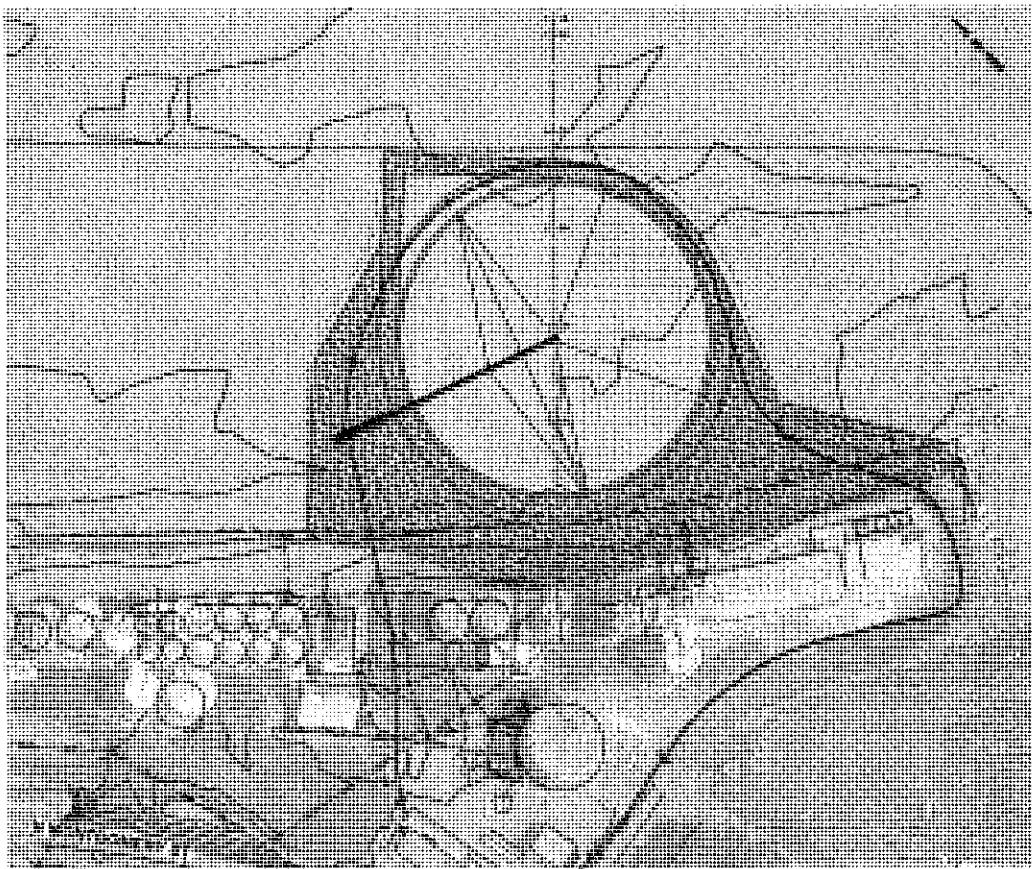
List of all major process equipment with manufacturer and maximum rated capacity.

- *Inbound Grain*
 - *90% Hopper Trucks: 105,000lbs. gross, 35,000lbs truck tare, 70,000lbs net grain.*
 - *10% Rear Dump: 55,000lbs. gross, 23,000lbs truck tare, 35,000lbs net grain.*
- *Existing Weight Scale and Office*
- *Receiver Pit, Inclined Conveyor, 20,000bu/hr*
- *Front-end Loader, CAT, 220bu/scoop.*
- *Outbound Grain*
 - *100% Hopper Trucks: 105,000lbs. gross, 35,000lbs truck tare, 70,000lbs net grain.*

Process flow diagram with all emission points identified.



Plan view site map.



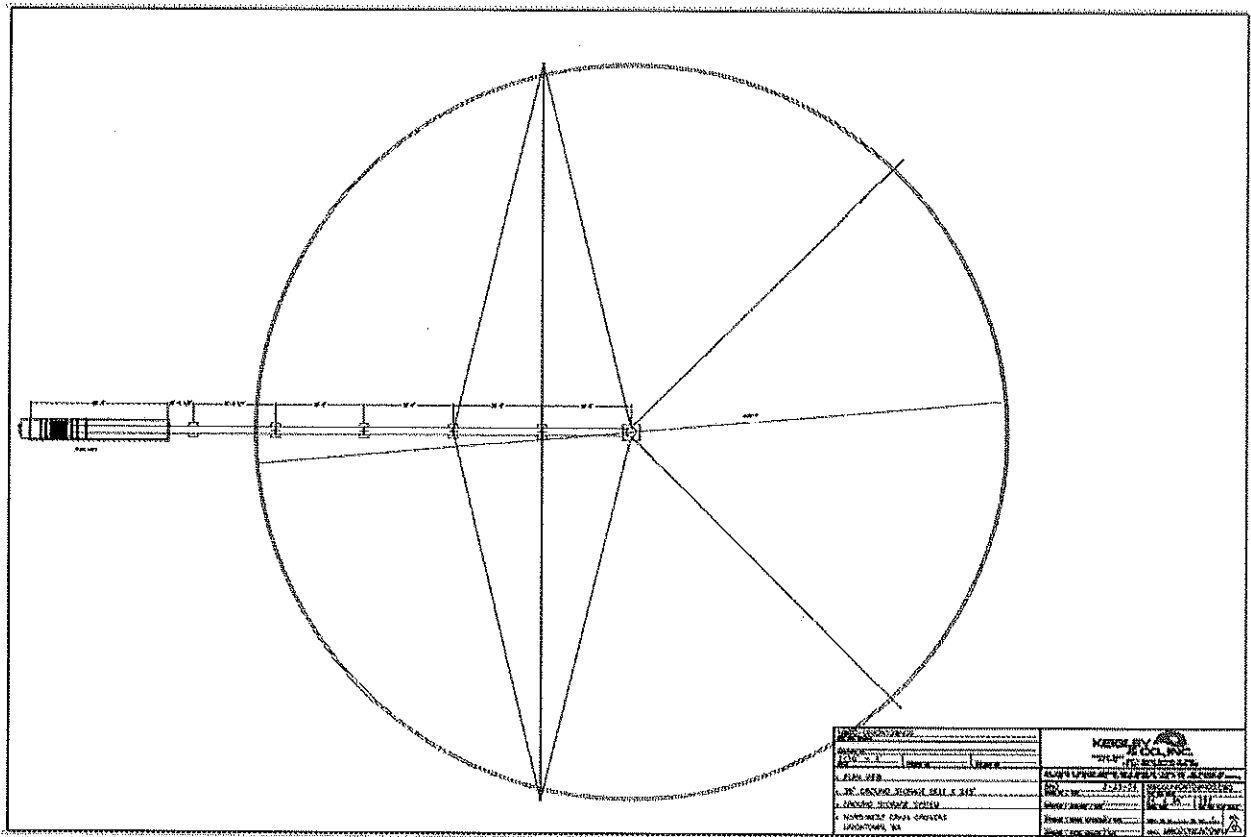
Manufacturer specification sheets for major process equipment components.

The pile conveyor is a commercial-available system being procured for this use. Technical specifications and background information is available at the following address.

<https://www.lemarindustries.com/pile-conveyers>

Description
Ground Storage Belt Conveyor System for (1) 20,000 BPH x 320' dia. Ground Pile (1.8 million bushel capacity)
36" wide inclined ground storage belt conveyor system x 265' long designed to make a 1,792,000 bushel ground pile 320' dia. complete with a 100 HP TEFC drive consisting of 36" X 48" wide truss sections fabricated, painted and assembled with idlers for bolt together installation, lower curve section with gravity takeup with 8" dia. x 38" wide bend pulleys, gravity takeup pulley 12" dia. x 38" wide, gravity takeup weights, 12" dia. x 38" wide tail pulley x 2-7/16" dia. shaft with Dodge screw takeups, 24" dia. x 38" lagged head pulley x 3-15/16" dia. head shaft, Dodge 3-15/16" dia. S2000 pillow block bearings, 36" wide x 4" dia. x 45 degree CEMA B troughing idlers on 4'-6" centers with (1) training idler, 4" dia. return rolls with (1) training return roll, 100 HP TEFC motor, Class II Dodge TA7315H15 shaft mount reducer, cooling fan, V-belt drive, belt guard, 36" wide 2-ply 220# V-Cleat MOR rubber conveyor belt with Flexco 375X splice and splice kit, enclosed belt loader with 3/8" UHMW lining, guide rolls, discharge hood with 1/4" urethane lining, drive over steel grate 68" x 71" including dust baffles below grate with 1/2" x 4" lb., 10 ga hopper, and 8WF28# beams, 1/2" plate steel pit covers for 8' deep x 8' wide concrete tunnel with handrail around perimeter.
System is complete with (2) supporting 12" dia. x 7 ga pipe columns, (2) 14" dia. x 7 ga pipe column with base plates and fabricated pole tops, and (1) 48" dia. center discharge pipe with hinged doors and material for guying consisting of 3/8" galvanized cable, clamps, 5/8" x 12" turnbuckles shackles, assembly bolts, adjacent entwalk with 24" wide galvanized Grip Strut walkway and handrail one side complete with top service platform and handrail, belt conveyor system fabricated, prime coated and enamel painted for bolt together installation.
Less guying stanchions, receiving pit stairs, concrete foundations, and installation.

Description
UNIONTOWN CO-OP GROUND PILE AERATION COMPONENTS
SUKUP FAN, AX, 24", 7-10 HP, 3PH, 2-4V, L/C #D3786
SHUTTER FOR 24" AXIAL FAN #D36691
SUKUP FAN, AX, 24", 5-7 HP, 3PH, 2-4V, L/C #D3766
SHUTTER FOR 24" AXIAL FAN #D36691
F.O.B. SHEFFIELD, IA
LOT OF (36) FABRICATED 18" DIA. AERATION PIPE SADDLES. PRIMED GRAY
LOT OF (3) 24" DIA. TO 18" DIA. X 30" LONG OFFSET FAN TRANSITIONS WITH 6" COLLARS ON EACH END AND 1-1/2" X 1-1/2" X 3/16" CUSTOM ANGLE RING FOR FAN END. 14 GA MILD STEEL. PRIMED GRAY
F.O.B. SPOKANE, WA
18" X 20" MAXAIR GRAIN AERATION PIPE-SOLID
18" X 20" MAXAIR GRAIN AERATION PIPE-PERFORATED
18" GRAIN AIR SOCK X 21'
18" MAX AIR EXTERNAL COUPLER
18" MAX AIR END CAP



Manufacturer specification sheets for pollution control equipment.

None.

Fuel specifications, including type, consumption (per hour & per year) and percent sulfur.

The front-end loader is diesel powered and used ~200 gallons to pick-up the IMbu pile. NWGG buys non-road and winterized diesel with 15ppm sulfur.

IV. State Environmental Policy Act (SEPA) Compliance

Check the appropriate box below.

SEPA review is complete:
Include a copy of the final SEPA checklist and SEPA determination (e.g., DNS, MDNS, EIS) with your application.

SEPA review has not been conducted:

If review will be conducted by another agency, list the agency. You must provide a copy of the final SEPA checklist and SEPA determination before Ecology will issue your permit.
Agency Reviewing SEPA: *Whitman County*

If the review will be conducted by Ecology, fill out a SEPA checklist and submit it with your application. You can find a SEPA checklist online at <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-document-templates>

V. Emissions Estimations of Criteria Pollutants

Does your project generate criteria air pollutant emissions? Yes No

If yes, please provide the following information regarding your criteria emissions in your application.

The names of the criteria air pollutants emitted (i.e., NO_x, SO₂, CO, PM_{2.5}, PM₁₀, TSP, VOC, and Pb).
Particulate Matter (as TSP, PM₁₀, PM_{2.5})

Potential emissions of criteria air pollutants in tons per hour, tons per day, and tons per year (include calculations).

See attached .xls spreadsheets

If there will be any fugitive criteria pollutant emissions, clearly identify the pollutant and quantity.
Particulate Matter (as TSP, PM₁₀, PM_{2.5}), haul roads, attached .xls spreadsheets

VI. Emissions Estimations of Toxic Air Pollutants

Does your project generate toxic air pollutant emissions? Yes No

If yes, please provide the following information regarding your toxic air pollutant emissions in your application.

The names of the toxic air pollutants emitted (specified in [WAC 173-460-150¹](#))

Potential emissions of toxic air pollutants in pounds per hour, pounds per day, and pounds per year (include calculations)

If there will be any fugitive toxic air pollutant emissions, clearly identify the pollutant and quantity

VII. Emission Standard Compliance

Provide a list of all applicable new source performance standards, national emission standards for hazardous air pollutants, national emission standards for hazardous air pollutants for source categories, and emission standards adopted under Chapter 70.94 RCW.

Does your project comply with all applicable standards identified? Yes No

VIII. Best Available Control Technology

Provide a complete evaluation of Best Available Control Technology (BACT) for your proposal.

The following Uniontown operations detail should be given "weight of measure" and applied as BACT strategies:

¹ <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-460-150>
ECY 070-410 (Rev. June 2023)

- a) *The majority of the delivery trucks are hopper trucks, having lower emission factors than rear-dumping trucks and known to generate less particulate emissions. Uniontown management can have authority over truck types, directing rear dumping trucks to its onsite elevator as needed.*
- b) *Chock flow is likely to be achieved with hopper trucks by choking the receiver belt and grain exits the truck at a coordinated managed rate. This technique limits the "freefall" of grain and potential particulate emissions.*
- c) *The receiving pit has hinged baffles that are normally closed pending grain delivery. There are segmented to allow for the capture and incorporation of grain dust into the grain conveyance stream. An emission reduction factor of 80% was used.*
- d) *The conveyor is open-topped. Yet, although the conveyor is not enclosed, the design is concaved. The weir gate is set so the cross-sectional profile of the grain is below the inflection point of the concaved conveyor. This acts to shelter the grain from cross winds and secondary spillage and particulate re-entrainment. Uniontown also applies a water-based insecticide to the top of the conveyor after the weir creates a profile.*
- e) *Uniontown will use a baffled centerpost that limits emissions as compared to headhouse operations. This comparison was conducted by WSU at Ritzville Warehouse Company (RWC), Templin operations and is on-file with WDOE. Grain drop-point emissions factors are substantially reduced.*
- f) *Uniontown elevator has promoted the use of recycled road-base materials on its truck traffic lanes and this will be applied to the temporary grain pile operation. We could not identify an AP42 factor for this medium; yet this road-base forms a hardpan surface, thus hard surface (pavement) emission estimates were applied to this roadway. Although antidotal, onsite observations could not visual detect truck travel emission. If needed, Uniontown has agreed to apply soil cement treatments prior to harvest.*
- g) *A Fugitive Dust Control Plan will be incorporated into operations.*
- h) *Uniontown has contracted with Keigley & Co. that has served the NW grain handling community and who understands the expectations of design, construction and use of stakeholders and regulators.*

IX. Ambient Air Impacts Analyses

Please provide the following:

- Ambient air impacts analyses for Criteria Air Pollutants (including fugitive emissions)
See attached spreadsheets
- Ambient air impacts analyses for Toxic Air Pollutants (including fugitive emissions)
- Discharge point data for each point included in air impacts analyses (include only if modeling is required)
 - Exhaust height. *The release point of the conveyor is 73-feet at the baffled centerpost.*
 - Exhaust inside dimensions (ex. diameter or length and width). *Baffled centerpost is 4'.*
 - Exhaust gas velocity or volumetric flow rate. *Does not apply*
 - Exhaust gas exit temperature . *Does not apply*
 - The volumetric flow rate. *Does not apply*
 - Description of the discharges (i.e., vertically or horizontally) and whether there are any obstructions (ex., raincap) *Does not apply*
 - Identification of the emission unit(s) discharging from the point. *Does not apply*
 - The distance from the stack (centerpost) to the nearest property line
Property line to northern edge (nearest point): 210-feet, dry land farm/fields.
 - Emission unit building height, width, and length
Grain pile dimensions 320' diameter x 73' high. Slope of pile between 25-27°. 1 or 2 Jersey Barriers may be used based on storage needs.
 - Height of tallest building on-site or in the vicinity and the nearest distance of that building to the exhaust. *Does not apply.*
 - Whether the facility is in an urban or rural location: *Rural*

Does your project cause or contribute to a violation of any ambient air quality standard or acceptable source impact level? Yes No

¹ <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-460-150>