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Pace International

27 January 2021

Ms. Kelly McFadden - Branch Chief
Air Permits and Toxics Division
U.S. EPA – Region 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3188

Subject: Title V Operating Permit Application Information Request

Dear Ms. McFadden,

Enclosed is the information requested by Ms. Amy Johansen in her letter dated December 21, 2020. We are providing the following documents:

1. Process description
2. Table of chemical and fuel storage tanks
3. Table of product manufacturing tanks
4. Plot plan showing tanks, vents, wastewater system, and other requested information
5. Revised applicable requirements table with additional FARR subsection references and a detailed compliance description for the 25 kW emergency generator
6. Signed CTAC form

Please contact me if you have any questions.

Kind regards,

William Osborne

William Osborne
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Pace International, LLC
Wapato Facility Process Description

Pace International, LLC (Pace) Wapato, WA facility is located within the boundaries of the Yakama Indian Reservation and operates under NAICS Code 325320. The facility operates one shift, usually five days per week, fifty-two weeks per year. Pace batch formulates many different products used in post-harvest fruit and vegetable processing, namely coatings, cleaners, fungicide formulations and diphenylamine (DPA) products. Pace also formulates products that protect crops from sun and rain damage. Many of the formulations are made with natural ingredients. Pace also purchases and resells products like sanitizers without repackaging.

Following a recipe (batch ticket), raw materials from Buildings 5 and 6 are transferred into formulation tanks in Building 6. Liquids are generally pumped into mix tanks using sealed pumps and flexible hoses. Solids are manually added from bags. Tank load cells are used to measure bulk ingredients. Lesser ingredients are weighed on a farm scale and then manually added to the tank. Some packaged raw materials are first heated in a hot box or hot room to aid material transfer. Building 6 bulk chemical tanks have passive, atmospheric vents.

Some formulations are heated to 150°F - 200°F (up to 300°F in a sealed pressure vessel) to melt waxes or shellac. Vessels are heated with steam generated by a propane fueled boiler (maximum design heat input of 31.7MMBtu/hr). Batches vary in raw materials and size from 55 to 5,000 gallons. Products are sampled, analyzed (Building 2) and adjusted to meet product specifications. Heated products are cooled prior to packaging.

Packaging activities (Building 6) involve transferring completed product into labeled totes or drums and then transferring them via forklift to the finished goods warehouse (Building 4). Some products are packed into 1, 2, or 5-gallon containers in the Crandall packaging area (Building 6). Intermediate products or partial containers are stored within Building 6.

Volatile organic compounds (VOCs) are used in making coatings, cleaners, fungicide formulations and DPA products. VOC's and other pollutants are exhausted through multiple roof vents in Building 6. The Shield Brite room has an exhaust manifold that draws vapors away from the operator when adding top loaded materials. Building 6 floor trenches drain to a process wastewater (PWW) vault. The vault is covered and has two stacks with inline fans that draw ventilation air through the trenches.

PWW is generated by laboratory operations, tank/process cleaning and container rinsing. PWW is pumped to one of two aerated solar evaporation ponds. Solids are periodically removed and managed as solid waste.

The facility has two propane fueled emergency generators. The generators provide backup power to critical laboratory instruments and the computer server room. Each has a non-resettable hour meter. Run hours are recorded monthly.

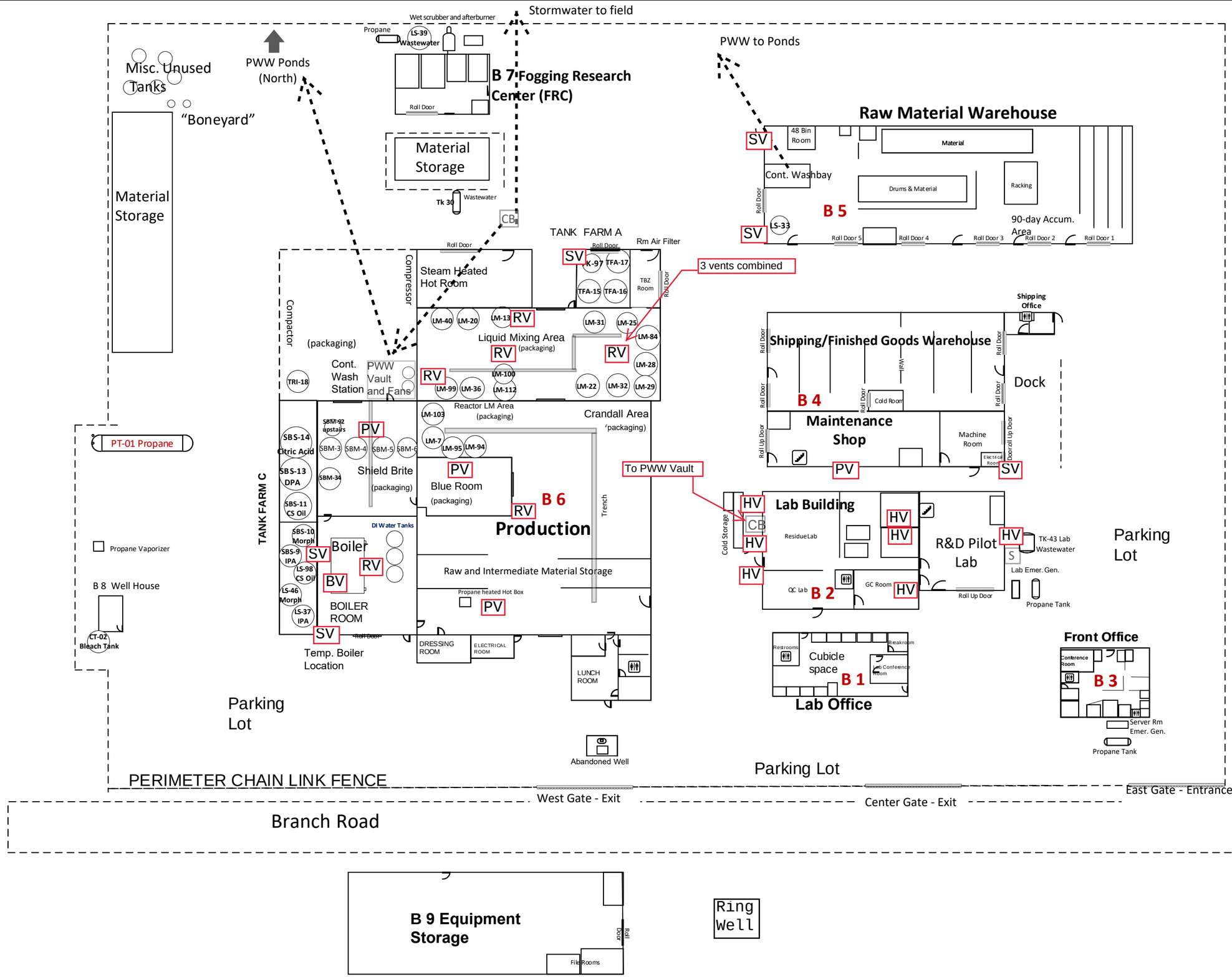
In 2019 the Fogging Research Center (Building 7) was constructed. The small building contains rooms that are similar in design to commercial fruit storage rooms. Liquid fogging formulations containing fungicide are aerosolized with a thermal appliance and applied to food items or objects in the enclosed rooms to study efficacy. Undeposited aerosol is vented to an afterburner for VOC control. There is a packed wet scrubber that provides a water quench barrier between the process and the afterburner.

Pace International, LLC - Wapato Facility

Tank Number	Approx. Capacity (Gallons)	Storage Material	Approx. Install Yr.
Tank Farm A, Building 6			
TFA-15	4400	Phosphoric Acid 75%	2019
TFA-16	4400	Potassium Hydroxide 45%	2019
TFA-17	2500	Sodium Hydroxide 50%	2019
TK-97	50	Water/Steam Receiver	2020
Tank Farm C, Building 6			
SBS-9	4890	Isopropyl Alcohol	Unknown
SBS-10	3150	Morpholine 98% (Not In Service)	Unknown
SBS-11	5000	Cottonseed Oil	Unknown
SBS-13	15900	DPA Blend	Unknown
SBS-14	20000	50% Citric Acid	Unknown
TRI-18	3000	Tri-Circ Acid	2019
LS-37	4800	Isopropyl Alcohol	Unknown
LS-46	3150	Morpholine 98% (Not In Service)	Unknown
LS-98	2990	Cottonseed Oil (NIS)	Unknown
CT-02	500	Sodium Hypchlorite Soln.	2015
Waste Water Tanks			
TK-30	10000	Central Waste Water	Unknown
TK-43	4000	Lab Waste Water	Unknown
LS-39		FRC Waste Water	2018
Propane Tanks			
Server EG	250	Propane	2007
Afterburner	1150	Propane	2018
Lab EG	250	Propane	2013
PT-01	18000	Propane	2016
Building 5			
LS-33	10000	Calcium Chloride 35%	2018
Building 6 Boiler Room			
DI-1	4000	DI Water	2017
DI-2	4000	DI Water	2017
DI-3	4000	DI Water	2017

Pace International, LLC - Wapato Facility

Tank Number	Approx. Capacity (Gallons)	Heated	Products	Approx. Install Yr.
Production Formulation Tanks in Building 6				
SBM-2	60	Yes	Coatings	Unknown
SBM-3	1200	Yes	Water	Unknown
SBM-4	2000	Yes	Coatings	Unknown
SBM-5	4500	No	Coatings and eFOG	Unknown
SBM-6	4700	No	Coatings and eFOG	Unknown
LM-7	3000	No	Coatings	Unknown
LM-13	4500	Yes	Coatings	2011
LM-20	3000	No	Coatings	Unknown
LM-22	4500	No	Coatings	Unknown
LM-25	300	Yes	Coatings	Unknown
LM-28	2000	No	Cleaners	Unknown
LM-29	2000	No	Cleaners	Unknown
LM-31	3000	Yes	Water	Unknown
LM-32	4500	Yes	Coatings	Unknown
SBM-34	300	Yes	Coatings and eFOG	Unknown
LM-36	1500	Yes	DPA Refining	2006
LM-40	2000	Yes	Water	Unknown
LM-84	4500	No	Coatings	Unknown
SBM-92	750	Yes	eFOG	Unknown
LM-94	300	Yes	Coatings	2006
LM-95	600	Yes	Coatings	2006
LM-99	2000	Yes	DPA Refining	2006
LM-100	1600	No	DPA Refining	2006
LM-103	1000	No	Salt Water	2006
LM-112	1600	No	DPA Refining	2006
100 Gal Pot	110	Yes	Everything	Unknown
100 Gal Pot	110	Yes	Everything	Unknown
55 Gal Pot	60	Yes	Everything	Unknown
60 Gal Pot	60	Yes	Everything	2021
120 Gal Pot	120	Yes	Everything	2021



Pace International, LLC
5661 Branch Road
Wapato WA, 98951
NAICS: 325320 SIC: 2879
RCRA ID: WAD988488052

S = PWW Sump
CB = Stormwater Catch Basin
SV = Steam Vent
PV = Process Vent
RV = Room Vent
BV = Boiler Vent
HV = Hood Vent
PWW = Process Waste Water

Restroom

Drawing Not To Scale

Tank, Vent and Wastewater Drawing Revisions

Rev. No.	Revision Description	Originator
Rev. Date		Approver
0	Document Creation	W. O.
210121		T. H.

Regulation	Reference	Description	Applicable Requirement	Affected Emissions Unit(s)	Current Compliance Status	Method Used to Determine Compliance Status
EPA Region 10 FARR Regulations	40 CFR 49.124	Rule for limiting visible emissions	The visible emissions from an air pollution source must not exceed 20% opacity, averaged over any consecutive six-minute period [§124(d)]. EPA Method 9 is used for determining compliance [§124(e)].	Facility-Wide	In Compliance	Ongoing compliance will be maintained by conducting monthly walkthroughs of the facility to identify and address sources of visible emissions.
	40 CFR 49.125	Rule for limiting the emissions of particulate matter	Particulate matter emissions from a combustion source stack or process source stack must not exceed an average of 0.23 grams per dry standard cubic meter (0.1 grains per dry standard cubic foot), corrected to seven percent oxygen, during any three-hour period [§125(d)]. EPA Method 5 is used for determining compliance [§125(e)].	Facility-Wide	In Compliance	Ongoing compliance will be maintained by conducting monthly walkthroughs of the facility to identify and address sources of visible emissions.
	40 CFR 49.126	Rule for limiting fugitive particulate matter emissions	The owner or operator of any source of fugitive particulate matter emissions, including any source or activity engaged in materials handling or storage, construction, demolition, or any other operation that is or may be a source of fugitive particulate matter emissions, must take all reasonable precautions to prevent fugitive particulate matter emissions and must maintain and operate the source to minimize fugitive particulate matter emissions [§126(d)]. Such reasonable precautions are listed in §126(d)(2).	Facility-Wide	In Compliance	Ongoing compliance will be maintained by conducting monthly walkthroughs of the facility to identify and address sources of fugitive particulate matter emissions.
	40 CFR 49.129	Rule for limiting emissions of sulfur dioxide	Sulfur dioxide emissions from a combustion or process source stack must not exceed an average of 500 parts per million by volume, on a dry basis and corrected to seven percent oxygen, during any three-hour period [§129(d)]. EPA Methods 6, 6A, 6B, and 6C are used for determining compliance [§129(e)].	Facility-Wide	In Compliance	Ongoing compliance is maintained by using fuels compliant with applicable sulfur limits in fuels, and these fuels being the only fuels combusted in regulated emission sources at the facility.
	40 CFR 49.130	Rule for limiting sulfur in fuels	For gaseous fuels, 1.1 grams of sulfur per dry standard cubic meter of gaseous fuel (400 parts per million at standard conditions) [§130(d)(8)]. ASTM methods D1072-90(Reapproved 1999), D3246-96, D4084-94 (Reapproved 1999), D5504-01, D4468-85 (Reapproved 2000), D2622-03, and D6228-98 (Reapproved 2003) are used for determining compliance [§130(e)(4)].	Facility-Wide	In Compliance	Ongoing compliance will be maintained by verifying fuel sulfur content supplied by the propane vendor, as required by §130(f)(1)(ii) and records kept for five years per §130(f)(2)
	40 CFR 49.135	Rule for emissions detrimental to public health or welfare	A person must not cause or allow the emission of any air pollutants from an air pollution source, in sufficient quantities and of such characteristic and duration, that the Regional Administrator determines causes or contributes to a violation of any national ambient air quality standard; or is presenting an imminent and substantial endangerment to public health or welfare, or the environment [§135(c)(1)].	Facility-Wide	In Compliance	Compliance with applicable emission limits and permit conditions assures compliance with this limit, per §135(d).
	40 CFR 49.137	Rule for air pollution episodes	Owners or operators of any air pollution source may volunteer or may be required to curtail or eliminate air emissions during the declaration of an applicable air pollution action level trigger [§137(c)(3) and (4)].	Facility-Wide	In Compliance	Ongoing compliance will be maintained by curtailing or eliminating air emissions during applicable air pollution action levels as directed by the Regional Administrator.
	40 CFR 49.138	Rule for the registration of air pollution sources and the reporting of emissions	Part 71 (Title V) sources must submit an annual registration that includes a facility description, emissions estimation methodology, annual emissions estimate, and fee calculation worksheet [§138(d) and (f)]	Facility-Wide	In Compliance	Ongoing compliance will be maintained by submitting annual reports containing applicable information and fees.
NSPS Subpart Dc	40 CFR 60.48c(a) and §60.7(a)(1) and (3)	Reporting and recordkeeping	An initial notification of construction is required that contains the date of startup, design heat capacity, identification of fuels, and the annual capacity factor the owner or operator anticipates operating the boiler.	B8 Boiler	In Compliance	An initial notification was submitted after construction.
	40 CFR 60.48c(g)	Reporting and recordkeeping	The owner or operator must maintain records of the total amount of steam generating fuel delivered to the property each month. The fuel must meet the most current requirements in §60.42c to demonstrate compliance with the SO_2 standard.	B8 Boiler	In Compliance	Ongoing compliance is maintained through retention of propane delivery records for at least two years.
NSPS Subpart JJJJ[1]	40 CFR 60.4233(c)	Emission standards	Owners and operators of stationary SI ICE with a maximum engine power greater than 19 KW (25 HP) manufactured on or after the applicable date in §60.4230(a)(4) that are rich burn engines that use LPG must comply with the emission standards in §60.4231(c) for their stationary SI ICE.	50 kW Emergency Generator	In Compliance	The emergency generators were purchased as engines certified to the applicable emission standards in 40 CFR Part 60. These standards are codified in §60.4231(c): "Stationary SI internal combustion engine manufacturers must certify their emergency stationary SI ICE greater than 25 HP and less than 130 HP that are rich burn engines that use LPG and that are manufactured on or after the applicable date in §60.4230(a)(4) to the Phase 1 emission standards in 40 CFR 90.103, applicable to class II engines, and other requirements for new nonroad SI engines in 40 CFR part 90."
	40 CFR 60.4237(c)	Monitoring	If you are an owner or operator of an emergency stationary SI internal combustion engine that is less than 130 HP, was built on or after July 1, 2008, and does not meet the standards applicable to non-emergency engines, you must install a non-resettable hour meter upon startup of your emergency engine.	50 kW Emergency Generator	In Compliance	The propane-fired emergency generators are each equipped with a non-resettable hour meter.
	40 CFR 4243(a)(1)	Operation and maintenance requirements and recordkeeping	If you operate and maintain the certified stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions, you must keep records of conducted maintenance to demonstrate compliance, but no performance testing is required if you are an owner or operator. You must also meet the requirements as specified in 40 CFR part 1068, subparts A through D, as they apply to you. If you adjust engine settings according to and consistent with the manufacturer's instructions, your stationary SI internal combustion engine will not be considered out of compliance.	50 kW Emergency Generator	In Compliance	The emergency generator is operated and maintained according to the manufacturer's emission-related instructions. Ongoing compliance is maintained by keeping records of maintenance conducted on the engine. Per 40 CFR 1068.1(11) The requirements of part 1068 do not apply to Pace because the emergency generator is not certified according to the provisions of part 1068 or part 1054. The generator is certified according to the provisions of §60.4231(c) and part 90 as shown above
	40 CFR 60.4243(d)	Operational requirements	Any operation other than emergency operation (no time limit), maintenance and testing and emergency demand response (up to 100 hours per year), and operation in non-emergency situations (up to 50 hours per year), is prohibited.	50 kW Emergency Generator	In Compliance	Ongoing compliance is demonstrated via compliance with the recordkeeping requirements in §60.4245(b).
	40 CFR 60.4245(a)	Notification, reporting, and recordkeeping requirements	Owners and operators of all stationary SI ICE must keep records of: (1) All notifications submitted to comply with this subpart and all documentation supporting any notification, (2) Maintenance conducted on the engine, and (3) If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable.	50 kW Emergency Generator	In Compliance	Ongoing compliance is maintained by keeping records of maintenance conducted on the engine. There are no initial or ongoing notifications required to comply with this subpart since the engine is less than 500 HP. The engine meets the emission standards stated in §60.4231(c) and manufacturer documentation is maintained that states compliance with applicable 40 CFR Part 60 emission standards.
	40 CFR 60.4245(b)	Notification, reporting, and recordkeeping requirements	For all stationary SI emergency ICE greater than 25 HP and less than 130 HP manufactured on or after July 1, 2008, that do not meet the standards applicable to non-emergency engines, the owner or operator of must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.	50 kW Emergency Generator	In Compliance	Ongoing compliance is maintained through documentation of emergency engine hours of operation, type of operation, and retention of records.

NSPS Subpart JJJJ Notes:

1 The smaller of the two emergency generators (the 25 kW unit) is made subject to NSPS JJJJ via NESHAP ZZZZ. Per §63.6590(c), the only applicable requirement under Subpart ZZZZ is to comply with NSPS Subpart JJJJ as applicable. NSPS JJJJ compliance is discussed in Section 4.1.3 of the application report. The 25 kW unit was installed at the facility in October 2007 and has not been subsequently modified or reconstructed. Subpart JJJJ compliance requirements apply to owners and operators of stationary spark ignition internal combustion engines (SI ICE) for which construction commenced after June 12, 2006 and that are manufactured on or after January 1, 2009 for emergency engines with a maximum power greater than 19 kW, per §60.4230(a)(4)(iii). The 25 kW unit was manufactured prior to January 1, 2009. Therefore, although the 25 kW unit is subject to NSPS JJJJ via NESHAP ZZZZ, the compliance requirements within NSPS Subpart JJJJ are not applicable to the 25 kW emergency generator because the date of manufacture is prior to 2009.

Regulation	Reference	Description	Applicable Requirement	Affected Emissions Unit(s)	Current Compliance Status	Method Used to Determine Compliance Status
NESHAP Subpart ZZZZ	40 CFR 63.6590(c)	Applicability	RICE units located at area sources of HAP and constructed after June 12, 2006 must meet the requirements of NESHAP Subpart ZZZZ by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part.	25 and 50 kW Emergency Generators	In Compliance	The emergency generators meet the provisions of NSPS JJJJ as applicable to each individual engine, and are therefore in compliance with NESHAP Subpart ZZZZ. Note that the provisions of NSPS JJJJ are not applicable to the 25 kW emergency generator as explained in Section 4.1.3 of the application report.
Protection of Stratospheric Ozone	40 CFR 82.154(a)	Venting prohibition	No person maintaining, servicing, repairing, or disposing of an appliance or industrial process refrigeration may knowingly vent or otherwise release into the environment any refrigerant from such appliances.	Refrigerant-Containing Appliances	In Compliance	Pace does not knowingly vent or otherwise release into the environment any refrigerants other than potential de minimis releases as defined in §82.154(a)(2).
	40 CFR 82.154(b)	Service and disposal requirements	No person may maintain, service, repair, or dispose of an appliance containing a class I or class II refrigerant or a non-exempt substitute refrigerant without: observing the applicable practices in §82.155, §82.156, and §82.157; and using recovery and/or recycling equipment that is certified for that type of refrigerant and appliance under §82.158.	Refrigerant-Containing Appliances	In Compliance	Pace contracts certified technicians to handle all maintenance, service, repair, and disposal of refrigerants and appliances that contain refrigerants.
	40 CFR 82154(c)-(f)	Manufacture, sale, and import restrictions	The manufacture, sale, and/or import of appliances, refrigerants, or one-time expansion devices is subject to various operational requirements, prohibitions, and recordkeeping and reporting.	Refrigerant-Containing Appliances	In Compliance	Pace does not manufacture, sell, or import any appliances, refrigerants, or one-time expansion devices as defined in Part 82.