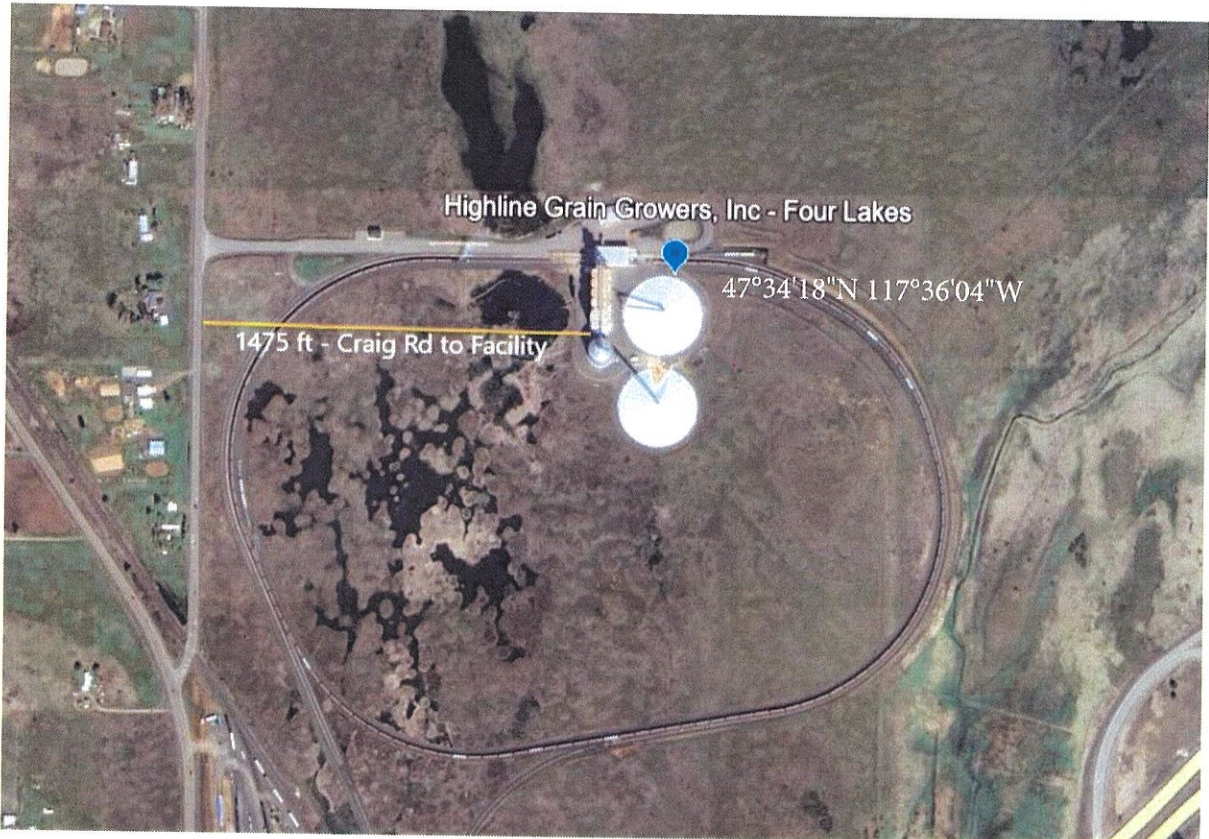


PART I – VARIANCE APPLICATION

Name of Applicant(s): Highline Grain Growers, Inc.			
Mailing Address: PO Box 649			
City: Waterville		State: WA	Zip: 98858
Phone: (509) 745-8551	Fax:	Cell: (509) 559-9029	Email: bradw@highlinegrain.com
Property Owner(s): Highline Grain Growers, Inc.			
Mailing Address: PO Box 649			
City: Waterville		State: WA	Zip: 98858
Phone: (509) 745-8551	Fax:	Cell: (509) 559-9029	Email: bradw@highlinegrain.com
<input checked="" type="checkbox"/> Detailed maps of the proposed variance location(s) must be attached			
Business Name(s): Highline Grain Growers, Inc.			
Site Address: 9025 South Craig Rd.			
City: Cheney		State: WA	Zip: 99004
Phone: (509) 559-9029	Fax:	Cell: (509) 559-9029	Email: bradw@highlinegrain.com
<p>1. I have read and initialed SRCAA Regulation I, Article III - Variances (Attached). <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>2. I am requesting a variance from state laws (e.g. RCWs) or regulations (e.g. WACs)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>3. <i>If #2, above, is "No", skip to #4. If #2, above, is "Yes": I understand I must first get and submit Ecology's written approval to SRCAA before SRCAA will initiate its review.</i> <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>4. I understand SRCAA's 65-day review period will begin when I have submitted my application with a filing fee of \$333 to SRCAA and SRCAA determines my application is complete. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>5. I understand that SRCAA charges a \$111/hr review and processing fee; SRCAA's full attorney fees; legal notice fees (SRCAA fees are independent of Ecology's fees). <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>6. I am authorized and do authorize Ecology and SRCAA access to the property referenced in my variance application for inspection and review. This includes private roads, etc. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>7. I understand application for a variance does not guarantee approval. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>8. I hereby certify that the information contained in this application, including supplemental information and data, is to the best of my knowledge complete and accurate. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>			
Applicant's Signature:			Date: 11/7/2024
Print Name: Brad Wiley			Title: East Region Foreman

Highline Grain Growers, Inc.
9025 South Craig Rd.
Cheney, WA, 99004



Explain how compliance with the rules or regulations would produce a serious hardship without equal or greater benefit to the public [Section 3.01(D)(3)] –

Proper air exchange within the grain storage structure is necessary during fill and reclaim procedures to maintain structural integrity. Vents at the bin top are engineered components of the structure that allow for proper air exchange. These openings allow air to escape during a fill process and also allow air to enter the storage bins when grain is being pulled out. Multiple openings on the bin deck serve a dual purpose as air vent and aeration fan. Fans are required for grain conditioning. Obstructing openings on the bin deck would remove our ability to use aeration to condition grain and would cause structural damage to the facility. This facility was designed and constructed to meet specific volume, safety and operational requirements. Compliance would require modifications that are operationally incompatible with the construction and design of the facility. Also, retrofitting to control bin vent exhaust would be cost prohibitive.

Explain the time period for which you are requesting the variance (not to exceed 1 year) [Section

3.01(D)(4)] – 12 months

How will you comply with rules or regulations following the expiration of the variance [Section

3.01(D)(5)] – We intend to lobby for a rule change regarding the application of opacity limits and guidelines to grain elevator operation. An observation of opacity does not appear to be an accurate determination of potential air pollution in this instance. The grain dust emitting from the vents and settling on the bin deck is not presenting a health hazard to employees on site. There is no evidence that the dust leaves the immediate area and no evidence that the operation could endanger public health or the environment. We are addressing the dust on the bin deck through normal housekeeping.

Explain why there is no practicable means for the prevention, abatement or control of the

pollution involved [Section 3.01(D)(6)] – Significant operational obstacles are present with the two potential control options that are available. Capturing dust with additional filters is one option. This would require large equipment be placed at or near the source. The structure was not engineered to accommodate additional equipment. The MCC does not have space for electrical equipment needed to power additional equipment. The filter manufacturer has recommended that other vents and openings be closed off to ensure proper dust control during the fill process. Restricting air flow could cause structural damage to the facility. This would also require closing off aeration fan openings that are currently used to condition grain in storage. Application of mineral oil is another proposed option. Mineral would be applied to grain in receiving conveyors through a spray nozzle. The application of oil is not compatible with operation of spot filters currently in operation. Oil mist can be drawn into the filter sock, impeding operation of existing filters.

List any alternatives that are available, including cost (attach supporting documentation) [Section

3.01(D)(7)] – Bin vent dust filters

Mineral oil application

PART II – SURROUNDING PARTIES & NEIGHBORS

List all parties and neighbors within 500 feet or more of the property on which the variance is proposed to occur, including mailing addresses [Section 3.01(D)(1)]. You may be required to provide contact information for parties beyond 500 feet if requested by Ecology or SRCAA [Section 3.01(E)]

Name: NOT APPLICABLE		Business Name:	
Address:			
City:	State:	Zip:	
Name:		Business Name:	
Address:			
City:	State:	Zip:	
Name:		Business Name:	
Address:			
City:	State:	Zip:	
Name:		Business Name:	
Address:			
City:	State:	Zip:	
Name:		Business Name:	
Address:			
City:	State:	Zip:	
Name:		Business Name:	
Address:			
City:	State:	Zip:	
Name:		Business Name:	
Address:			
City:	State:	Zip:	

*Copy and attach additional pages if necessary.

PART III – APPLYING FOR A VARIANCE FROM WHAT LAWS/REGULATIONS

You must list all state rule(s) and SRCAA regulation(s) which apply to your application for a variance. [Section 3.01(D)(2)]

SRCAA Regulation 1 Section 6.02

SRCAA Regulation 1 Section 2.14 (A), specifically as it pertains to WAC 173-400-040(2)