

February 11, 2021

Robert Baker  
Pac Paper, LLC  
6416 NW Whitney Road  
Vancouver, WA 98665

Subject: Final Approval for Installation for Four New Bag Making Lines

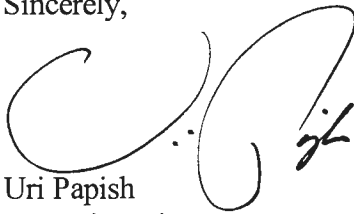
Dear Mr. Baker:

A final determination to issue Air Discharge Permit (ADP) 21-3451 has been completed for ADP Application CL-3135 pursuant to Section 400-110(4) of the General Regulations for Air Pollution Sources of the Southwest Clean Air Agency (SWCAA). Public notice for ADP Application CL-3135 was published in the permit section of SWCAA's website on July 16, 2020. SWCAA did not receive a request for a public comment period in response to the public notice and has concluded that significant public interest does not exist for this determination. Therefore, a public comment period will not be provided for this permitting action. Electronic copies of ADP 21-3451 and the associated Technical Support Document are available to the public for review in the permit section of SWCAA's internet website (<http://swcleanair.org/permits/adpfinal.asp>). Original copies are enclosed for your files.

This Air Discharge Permit may be appealed directly to the Pollution Control Hearings Board (PCHB) at P.O. Box 40903, Olympia, Washington 98504-0903 within 30 days of receipt of this Permit as provided in RCW 43.21B.

If you have any comments or desire additional information, please contact me or Vanessa McClelland at (360) 574-1538, extension 129.

Sincerely,



Uri Papish  
Executive Director

UP: vm

Attachments: Air Discharge Permit 21-3451 and Technical Support Document



**SOUTHWEST CLEAN AIR AGENCY**

**Air Discharge Permit  
SWCAA 21-3451**

**February 11, 2021**

Facility Name: Pac Paper, LLC  
Physical Location: 6416 Whitney Road  
Vancouver, Washington 98665

SWCAA ID: 1560

REVIEWED BY:

  
Paul T. Mairose, Chief Engineer



APPROVED BY:

  
Uri Papish, Executive Director

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## 1. Equipment/Activity Identification

| ID No. | Equipment/Activity   | Control Equipment / Measure                |
|--------|--|--|
| 1      | #1 Fruit Press (Strachan Henshaw SN 4307/1)                  | Low-VOC Ink                                |
| 2      | #2 Fruit Press (Strachan Henshaw SN 4380/1)                  | Low-VOC Ink                                |
| 3      | #3 Fruit Press (Strachan Henshaw SN 4380/2)                  | Low-VOC Ink                                |
| 4      | Wolverine Press (SN HLRE-768)                                | Low-VOC Ink                                |
| 5      | Hudson Sharpe Press (SN 3088) with Maxon Burner              | Low-VOC Ink, Low Sulfur Fuel (natural gas) |
| 6      | Pear Wrap Press/Coater (Faustell)                            | Low-VOC Ink                                |
| 7      | Two Shopper Bag Making Machines (Newlong)                    | Low-VOC Ink                                |
| 8      | Two Folder Gluers (Wolverine Cub)                            | Low-VOC Ink                                |
| 9      | Two Grocery Bag Making Machines (Weber) / Lines 603 and 604  | Low-VOC Ink                                |
| 10     | Two Shopper Bag Making Machines (Garant) / Lines 605 and 606 | Low-VOC Ink                                |
| 11     | Seventeen Space Heaters (3.4 MMBtu/hr total)                 | Low Sulfur Fuel (natural gas)              |

## 2. Permit Requirements

The following tables detail the specific requirements of this Air Discharge Permit (ADP). In addition to the requirements listed below, equipment at this facility may be subject to other federal, state, and local regulations. The requirement number is identified in the left-hand column. The text of the ADP requirement is contained in the middle column. The emission unit, equipment, or activity to which the permit requirement applies is listed in the right-hand column.

This ADP supersedes ADP 18-3313 in its entirety.

**Emission Limits**

| Req.             | Emission Limits  | Equipment/<br>Activity ID |                       |     |                     |                       |  |                 |   |                    |    |                     |                    |          |
|------------------|--|---------------------------|-----------------------|-----|---------------------|-----------------------|--|-----------------|---|--------------------|----|---------------------|--------------------|----------|
| 1.               | <p>Emissions of from printing and gluing operations must not exceed the following:</p> <table border="0" data-bbox="228 342 1271 562"> <tr> <td><u>Pollutant</u></td> <td><u>Emission Limit</u></td> </tr> <tr> <td>VOC</td> <td>11.50 tons per year</td> </tr> <tr> <td>TAPs</td> <td>Limited to SQER for each pollutant. Combined TAPs (not including acetone or other non-VOC TAPs) must not exceed the VOC emission limit established above</td> </tr> <tr> <td>HAPS</td> <td>10.0 tons per year single/25.0 tons per year combined</td> </tr> </table> <p>Emissions must be calculated based on actual material consumption, manufacturer's material data, and material balance methodology consistent with Section 6 of the TSD for this ADP. The material balance must include ink, coatings, and solvent purchases and beginning inventory, returns, ending inventory, and waste shipped off-site.</p> | <u>Pollutant</u>          | <u>Emission Limit</u> | VOC | 11.50 tons per year | TAPs                  | Limited to SQER for each pollutant. Combined TAPs (not including acetone or other non-VOC TAPs) must not exceed the VOC emission limit established above | HAPS            | 10.0 tons per year single/25.0 tons per year combined | 1 - 10             |    |                     |                    |          |
| <u>Pollutant</u> | <u>Emission Limit</u>  |                           |                       |     |                     |                       |  |                 |   |                    |    |                     |                    |          |
| VOC              | 11.50 tons per year  |                           |                       |     |                     |                       |  |                 |   |                    |    |                     |                    |          |
| TAPs             | Limited to SQER for each pollutant. Combined TAPs (not including acetone or other non-VOC TAPs) must not exceed the VOC emission limit established above   |                           |                       |     |                     |                       |  |                 |   |                    |    |                     |                    |          |
| HAPS             | 10.0 tons per year single/25.0 tons per year combined  |                           |                       |     |                     |                       |  |                 |   |                    |    |                     |                    |          |
| 2.               | <p>Emissions from natural gas combustion from the space heaters and Hudson Sharp press dryer Maxon burner must not exceed the following:</p> <table border="0" data-bbox="228 947 1097 1094"> <tr> <td></td> <td><u>Emission Limit</u></td> <td></td> </tr> <tr> <td><u>Pollutant</u></td> <td><u>(1-hr average)</u></td> <td><u>Emission Limit</u></td> </tr> <tr> <td>NO<sub>x</sub></td> <td>0.43 pound per hour</td> <td>1.89 tons per year</td> </tr> <tr> <td>CO</td> <td>0.36 pound per hour</td> <td>1.59 tons per year</td> </tr> </table> <p>Emissions must be calculated consistent with the methodology and emission factors presented in Section 6 of the TSD for this ADP.</p>   |                           | <u>Emission Limit</u> |     | <u>Pollutant</u>    | <u>(1-hr average)</u> | <u>Emission Limit</u>  | NO <sub>x</sub> | 0.43 pound per hour                                   | 1.89 tons per year | CO | 0.36 pound per hour | 1.59 tons per year | 5 and 11 |
|                  | <u>Emission Limit</u>  |                           |                       |     |                     |                       |  |                 |   |                    |    |                     |                    |          |
| <u>Pollutant</u> | <u>(1-hr average)</u>  | <u>Emission Limit</u>     |                       |     |                     |                       |  |                 |   |                    |    |                     |                    |          |
| NO <sub>x</sub>  | 0.43 pound per hour  | 1.89 tons per year        |                       |     |                     |                       |  |                 |   |                    |    |                     |                    |          |
| CO               | 0.36 pound per hour  | 1.59 tons per year        |                       |     |                     |                       |  |                 |   |                    |    |                     |                    |          |
| 3.               | <p>Visible emissions from approved equipment must not exceed zero percent (0%) opacity for more than three (3) minutes in any 1-hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).</p>   | 1 - 11                    |                       |     |                     |                       |  |                 |   |                    |    |                     |                    |          |

**Operating Limits and Requirements**

| Req. | Operating Limits and Requirements  | Equipment/<br>Activity ID |
|------|--|---------------------------|
| 4.   | <p>Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.</p>   | Facility-wide             |
| 5.   | <p>Odors from the facility must not unreasonably interfere with any other property owner's use and enjoyment of their property. Recognized good practice and procedures must be used to reduce odors to a reasonable minimum.</p>  | Facility-wide             |
| 6.   | <p>Emission units and activities identified in this ADP must be maintained and operated in total and continuous conformity with the conditions specified in this ADP. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this ADP, including directing the facility to cease operations until corrective action can be completed.</p> | 1 - 11                    |

| Req. | Operating Limits and Requirements   | Equipment/<br>Activity ID |
|------|---|---------------------------|
| 7.   | All containers for VOC containing materials must be kept securely closed with a lid in place except when in active use. Open containers for storage or disposal of VOC containing materials are prohibited. In addition, all VOC containing materials used to clean and/or flush equipment or lines during clean up must be collected and stored in a closed container. Disposal of rags and wipes must be in a manner that minimizes fugitive emissions of VOCs. | Facility-wide             |

### Monitoring and Recordkeeping Requirements

| Req. | Monitoring and Recordkeeping Requirements   | Equipment/<br>Activity ID |
|------|---|---------------------------|
| 8.   | With the exception of data logged by a computerized data acquisition system, each record required by this ADP must include the date and the name of the person making the record entry, at minimum. If a control device or process is not operating, a record must be made to that effect.  | 1 - 11                    |
| 9.   | All records required by this ADP must be kept for a minimum period of no less than three (3) years and must be maintained in a form readily available for inspection by SWCAA representatives.  | Facility-wide             |
| 10.  | Excess emissions and upset conditions must be recorded for each occurrence.   | Facility-wide             |
| 11.  | For VOC, HAP, or TAP-containing products used by the Permittee, purchase receipts and Safety Data Sheets/Technical Data Sheets must be maintained in a form readily available for inspection.   | 1 - 10                    |
| 12.  | Operational data must be monitored and recorded as follows:<br>(a) Ink, solvent, and glue consumption                      Recorded monthly<br>(b) Natural gas consumption                                      Recorded monthly<br>(c) Type and quantity of hazardous waste disposal       Recorded for each occurrence<br>(d) Equipment repair and maintenance activity              Recorded for each occurrence | 1 - 11                    |

### Tuning and Testing Requirements

There are no emission monitoring or testing requirements for the approved equipment cited in this ADP.

### Reporting Requirements

| Req. | Reporting Requirements  | Equipment/<br>Activity ID |
|------|---|---------------------------|
| 13.  | Upset conditions must be reported to SWCAA as soon as possible after discovery. The permittee may provide notification to SWCAA via telephone. A message may be left on the answering machine for upset conditions that occur outside of normal business hours. | Facility-wide             |

|     |  |               |
|-----|--|---------------|
| 14. | <p>Excess emissions must be reported to SWCAA as follows:</p> <ul style="list-style-type: none"> <li>(a) As soon as possible, but no later than twelve (12) hours after discovery for emissions that represent a potential threat to human health or safety;</li> <li>(b) As soon as possible, but no later than forty-eight (48) hours after discovery for emissions which the Permittee wishes to claim as unavoidable pursuant to SWCAA 400-107(1); and</li> <li>(c) No later than thirty (30) calendar days after the end of the month of discovery for all other excess emissions.</li> </ul>   | Facility-wide |
| 15. | <p>All air quality-related complaints received by the Permittee must be reported to SWCAA within three (3) calendar days of receipt. Complaint reports must include the date and time of the complaint, the name and contact information (if available) for the complainant, the nature of the complaint, and any actions taken by the Permittee to address the complaint.</p>   | Facility-wide |
| 16. | <p>SWCAA must be notified at least seven days in advance of the use of any new material in excess of five (5) gallons which will result in emissions of toxic or hazardous air pollutants not listed in Section 6 of the TSD for this ADP. The written notice must include the following:</p> <ul style="list-style-type: none"> <li>(a) A description of the proposed change(s) in materials with an SDS for each new material,</li> <li>(b) The date the change(s) is (are) to be made,</li> <li>(c) The change(s) in emissions of VOCs, HAPs, and TAPs occurring as a result of the change, and</li> <li>(d) A summary of any applicable requirement(s) that would apply as a result of the change(s).</li> </ul> <p>If the proposed emission rate of a new TAP exceeds the SQER and/or the VOC limit established in this ADP or otherwise circumvents an applicable requirement including those established by this ADP, New Source Review must be required prior to making the proposed change.</p> | Facility-wide |
| 17. | <p>An annual emissions inventory report must be submitted to SWCAA by March 15<sup>th</sup> for emissions from the previous calendar year in accordance with SWCAA 400-105(1). Each report must contain, at a minimum, the following information:</p> <ul style="list-style-type: none"> <li>(a) The annual sum of emissions of NO<sub>x</sub>, CO, VOC, SO<sub>2</sub>, PM, PM<sub>10</sub>, PM<sub>2.5</sub>, TAPs, and HAPs;</li> <li>(b) The quantity of each product consumed (gallons or pounds) containing VOCs, HAPS, or TAPs;</li> <li>(c) The quantity and type of hazardous waste disposed; and</li> <li>(d) The quantity of natural gas consumption.</li> </ul>  | 1 – 11        |

### 3. General Provisions

| No. | General Provisions   |
|-----|--|
| A.  | For the purpose of ensuring compliance with this ADP, duly authorized representatives of the Southwest Clean Air Agency must be permitted access to the Permittee's premises and the facilities being constructed, owned, operated, and/or maintained by the Permittee for the purpose of inspecting said facilities. These inspections are required to determine the status of compliance with this ADP and applicable regulations and to perform or require such tests as may be deemed necessary. |
| B.  | The provisions, terms, and conditions of this ADP bind the Permittee, its officers, directors, agents, servants, employees, successors and assigns, and all persons, firms, and corporations acting under or for the Permittee.  |
| C.  | The requirements of this ADP survive any transfer of ownership of the source or any portion thereof.   |
| D.  | This ADP must be posted conspicuously at or be readily available near the source.  |
| E.  | Approval and associated ADP requirements for any new or modified equipment will be invalid if installation or modification of the affected equipment has not commenced within eighteen (18) months from date of issuance, is discontinued for a period of eighteen (18) months or more, or is not completed within a reasonable time.  |
| F.  | This ADP does not supersede requirements of other Agencies with jurisdiction and further, this ADP does not relieve the Permittee of any requirements of any other governmental Agency. In addition to this ADP, the Permittee may be required to obtain permits or approvals from other agencies with jurisdiction.   |
| G.  | Compliance with the terms of this ADP does not relieve the Permittee from the responsibility of compliance with SWCAA General Regulations for Air Pollution Sources, previously issued Regulatory Orders, RCW 70.94, Title 173 WAC or any other applicable emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply.  |
| H.  | If any provision of this ADP is held to be invalid, all unaffected provisions of the ADP will remain in effect and be enforceable.   |
| I.  | No change in this ADP will be made or be effective except as may be specifically set forth by written order of the Southwest Clean Air Agency upon written application by the Permittee for the relief sought.   |
| J.  | The Southwest Clean Air Agency may, in accordance with RCW 70.94 impose such conditions as are reasonably necessary to assure the maintenance of compliance with the terms of this ADP, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act.   |



## State Environmental Policy Act

### DETERMINATION OF NONSIGNIFICANCE (DNS) – SWCAA 21-002

#### Description of proposal:

ADP Application CL-3135: The proponent has applied for a permit to install and operate four new printing and bag making equipment lines (L-603 through L-606) and for the use of new low VOC inks. The new equipment will be located within the existing production building. The new equipment will produce a small amount of emissions of volatile organic compounds and toxic air pollutants. At the emission levels proposed, this equipment will not have a significant adverse impact on ambient air quality. This permitting action is not expected to have any effect on traffic, noise, glare, housing, or recreation opportunities.

#### Proponent:

Pac Paper, LLC – (Mr. Robert Baker)

#### Location of proposal, including street address if any:

6416 NW Whitney Road  
Vancouver, WA 98665

#### Lead agency: Southwest Clean Air Agency

The lead agency for this proposal has determined that it does not have a probable significant impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.

- There is no comment period for this DNS.
- This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 15 days from the date below. Comments must be submitted by \_\_\_\_\_.

Responsible official: Paul T. Mairose, P.E.

Position/title: Chief Engineer

Address: Southwest Clean Air Agency  
11815 NE 99<sup>th</sup> Street, STE 1294  
Vancouver, WA 98682-2454

Phone: (360) 574-3058 ext. 130

Signature: Paul T. Mairose

Date: 2/11/21

