



SWCAA
Southwest Clean Air Agency

5101 NE 82nd Ave, Ste 102
Vancouver, WA 98662
(360) 574-3058
www.swcleanair.gov

April 2, 2025

Mr. Kyle Crebar
Pacific Coast Shredding
900 Port Way
Vancouver, WA 98660

RE: Final Approval to Voluntarily Restrict Shredder Vehicle Throughput

Dear Mr. Crebar:

A final determination to issue Air Discharge Permit (ADP) 14-3115R1 has been completed for ADP application CL-3255 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-3255 was published in the permit section of SWCAA's website on November 21, 2023. SWCAA did not receive any inquiries or 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 14-3115R1 and the associated Technical Support Document are available for public review in the "Recent Air Discharge Permits" section under the "Air Permits" link on SWCAA's website (<http://www.swcleanair.gov>). Original copies are enclosed for your files.

ADP 14-3115R1 may be appealed directly to the Pollution Control Hearings Board (PCHB) within thirty (30) days of receipt as provided in Revised Code of Washington (RCW) 43.21B.

If you have any questions or comments, or desire additional information, please contact me or Clint Lamoreaux at (360) 574-3058, extension 131.

Sincerely,

Uri Papish
Executive Director

UP:cl

Enclosure: Air Discharge Permit 14-3115R1





**AIR DISCHARGE PERMIT
14-3115R1**

Issued: April 2, 2025

**Pacific Coast Shredding
900 Port Way, Vancouver, WA**

SWCAA ID – 2316

REVIEWED BY:

A handwritten signature in blue ink, appearing to read "Clinton H. Lamoreaux", written over a horizontal line.

Clinton Lamoreaux, Chief Engineer

APPROVED BY:

A handwritten signature in blue ink, appearing to read "Uri Papish", written over a horizontal line.

Uri Papish, Executive Director



TABLE OF CONTENTS

1. Equipment/Activity Identification	1
2. Permit Requirements.....	1
Emission Limits	1
Operating Limits and Requirements	2
Monitoring and Recordkeeping Requirements	4
Emission Monitoring and Testing Requirements	4
Reporting Requirements	5
3. General Provisions	5

1. Equipment/Activity Identification

ID No.	Equipment/Activity	Control Equipment/Measure
1	Shredder	Wet suppression
2	Z-Box	Cyclone
3	Material Handling	Wet suppression
4	Yard and Roads	Wet suppression, sweeping
5	Metal Cutting - Acetylene	None
6	Metal Cutting – Plasma	Water table (semi-dry cutting)

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 requirement is contained in the middle column. The emission unit, equipment, or activity to which the requirement applies is listed in the right-hand column.

Air Discharge Permit 14-3115 is superseded in its entirety by this Air Discharge Permit.

Emission Limits

Req. No.	Emission Limits	Equipment/ Activity ID No.								
1.	<p>Facility-wide emissions must not exceed the following:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>VOC as C₃H₈</td><td>59.73 tons per year</td></tr><tr><td>PM₁₀</td><td>5.29 tons per year</td></tr><tr><td>PM_{2.5}</td><td>5.12 tons per year</td></tr></table> <p>Annual emissions must be calculated using the emission factors presented in the Technical Support Document for this Air Discharge Permit unless more recent source test data has been collected.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	VOC as C ₃ H ₈	59.73 tons per year	PM ₁₀	5.29 tons per year	PM _{2.5}	5.12 tons per year	Facility-wide
<u>Pollutant</u>	<u>Emission Limit</u>									
VOC as C ₃ H ₈	59.73 tons per year									
PM ₁₀	5.29 tons per year									
PM _{2.5}	5.12 tons per year									
2.	<p>Emissions of filterable particulate matter from the Z-Box cyclone must not exceed the following:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>PM₁₀</td><td>0.010 grains per dry standard cubic foot (1-hour average)</td></tr><tr><td>PM₁₀</td><td>1.0 pounds per hour (1-hour average)</td></tr></table>	<u>Pollutant</u>	<u>Emission Limit</u>	PM ₁₀	0.010 grains per dry standard cubic foot (1-hour average)	PM ₁₀	1.0 pounds per hour (1-hour average)	2		
<u>Pollutant</u>	<u>Emission Limit</u>									
PM ₁₀	0.010 grains per dry standard cubic foot (1-hour average)									
PM ₁₀	1.0 pounds per hour (1-hour average)									

Req. No.	Emission Limits	Equipment/ Activity ID No.								
3.	<p>Emissions from plasma cutting must not exceed:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>Nitrogen Oxides</td><td>0.26 tons per year</td></tr><tr><td>PM₁₀</td><td>0.06 tons per year</td></tr><tr><td>PM_{2.5}</td><td>0.06 tons per year</td></tr></table> <p>Annual emissions must be calculated using the emission factors presented in the Technical Support Document for this Air Discharge Permit unless more recent source test data has been collected.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	Nitrogen Oxides	0.26 tons per year	PM ₁₀	0.06 tons per year	PM _{2.5}	0.06 tons per year	6
<u>Pollutant</u>	<u>Emission Limit</u>									
Nitrogen Oxides	0.26 tons per year									
PM ₁₀	0.06 tons per year									
PM _{2.5}	0.06 tons per year									
4.	Visual emissions from the shredder, the Z-Box cyclone, material handling, and roadways must not exceed zero percent opacity for more than three minutes in any one hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).	1 - 4								
5.	Visual emissions from acetylene torch metal cutting must not exceed twenty percent opacity for more than three minutes in any one hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).	5								
6.	Visual emissions from plasma torch metal cutting must not exceed ten percent opacity for more than three minutes in any one hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).	6								

Operating Limits and Requirements

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
7.	Shredder throughput must not exceed 395,715 tons per year. The mass of vehicles shredded must not exceed 100,000 tons per year.	1
8.	To the maximum extent practical, prior to shredding uncrushed automobiles, appliances and other scrap, all mercury-containing switches and sensors must be removed.	Facility-wide
9.	The Permittee must not accept crushed automobiles unless the supplier can demonstrate that mercury-containing switches and sensors have been removed.	Facility-wide
10.	To the maximum extent practical, prior to shredding uncrushed vehicles, the Permittee must assure that all fluids, batteries, and refrigerants have been removed.	Facility-wide
11.	At least 7 gallons of water per minute must be injected into the shredder during operation. Additional water must be injected as necessary to limit visual emissions to 0% opacity.	1

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
12.	<p>Wet suppression must be used as necessary in the process area, scrap piles, and shred piles to control fugitive dust during operations except as prohibited by other applicable rules (e.g. stormwater discharge rules). The permittee must use best practices to apply water in such a way that runoff is not generated (e.g. water application is balanced by evaporation). Best practices may include, but is not limited to:</p> <ul style="list-style-type: none"> (a) Application of the water using sufficiently high pressure and appropriate nozzles to make a fine mist; (b) Even application of water to prevent runoff; and (c) Damming or blocking the stormwater collection point during dry periods to allow the application of water while preventing runoff. 	1 – 4
13.	Exhaust from the Z-Box cyclone must be discharged vertically. Any device that obstructs or prevents vertical discharge is prohibited.	2
14.	<p>Smoke generation during acetylene torch cutting must be minimized by the use of best practices, including, but not limited to the following:</p> <ul style="list-style-type: none"> (a) Wiping excess dirt and oil from the cutting surface; and; (b) Placing or choosing the cutting surface such that the torch flame does not impinge on the ground. 	5
15.	<p>Smoke generation during plasma torch cutting must be minimized by the use of best practices, including, but not limited to the following:</p> <ul style="list-style-type: none"> (a) Maintaining the water table no more than 5 centimeters below the surface of the cutting table. 	6
16.	Emission units identified in this Permit must be maintained and operated in total and continuous conformity with the conditions identified in this Permit. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this Permit, including directing the facility to cease operations until corrective action can be completed.	Facility-wide

Monitoring and Recordkeeping Requirements

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
17.	<p>The following information must be collected, recorded at the intervals specified below, and readily available on-site for inspection:</p> <ul style="list-style-type: none"> (a) The total amount of material shredded must be determined and recorded for each calendar year; (b) The total mass of vehicles shredded must be recorded for each calendar month as determined using the incoming material weigh scale; (c) The total number of mercury switches collected must be recorded for each calendar year; (d) The number of hours the shredder is operated must be recorded for each calendar year; (e) The total facility throughput of material that is not shredded must be determined and recorded for each calendar year; (f) The total number of man-hours of acetylene torch cutting must be recorded for each calendar year; (g) The total number of hours of plasma cutting must be recorded for each calendar year; (h) The gap between the water level and the surface of the plasma cutting table(s) must be measured and recorded at least once per week of operation; (i) Upset conditions that cause excess emissions must be recorded for each occurrence; and (j) All air quality related complaints, including odor complaints, received by the permittee and the results of any subsequent investigation or corrective action must be recorded for each occurrence. 	Facility-wide
18.	With the exception of data logged by a computerized data acquisition system, each record required by this Air Discharge Permit must include the date and the name of the person making the record entry.	Facility-wide
19.	All records required by this Air Discharge Permit must be kept on site for a minimum period of no less than three years and must be available for inspection by SWCAA representatives.	Facility-wide

Emission Monitoring and Testing Requirements

Req. No.	Emission Monitoring and Testing Requirements	Equipment/ Activity ID No.
20.	Source emissions testing of the Z-Box cyclone must be conducted no later than May 31, 2029 and at least once every five years thereafter (no later than May 31 st of each year in which testing is required) in accordance with Appendix A of this Permit.	2

Reporting Requirements

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
21.	All air quality related complaints, including odor complaints, received by the permittee must be reported to SWCAA within three days of receipt.	Facility-wide
22.	The results of all source emissions testing conducted in accordance with Appendix A must be reported to SWCAA within 45 days of test completion.	1
23.	Excess emissions must be reported to SWCAA as follows: (a) As soon as possible, but no later than 12 hours after discovery for emissions that represent a potential threat to human health or safety; (b) As soon as possible, but no later than 48 hours after discovery for emissions which the permittee wishes to claim as unavoidable pursuant to SWCAA 400-107(1); and (c) No later than 30 days after the end of the month of discovery for all other excess emissions.	Facility-wide
24.	Deviations from permit conditions must be reported no later than 30 days after the end of the month during which the deviation is discovered.	Facility-wide
25.	The following emissions related records must be reported to SWCAA by March 15 th for the previous calendar year: (a) The total amount of material shredded; (b) The total mass of vehicles shredded each month and the total for the year; (c) The total number of mercury switches collected; (d) The number of hours the shredder is operated; (e) The total facility throughput of material that is not shredded; (f) The total number of man-hours of acetylene torch cutting; (g) The total number of hours of plasma cutting; and (h) Air emissions of criteria air pollutants, volatile organic compounds, hazardous air pollutants (HAPs), and toxic air pollutants (TAPs).	Facility-wide

3. General Provisions

Req. 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.

Req. No.	General Provisions
E.	This ADP will be invalidated, in whole or in part, if construction or installation of any new or modified equipment has not commenced within eighteen (18) months from date of issuance, if construction is discontinued for a period of eighteen (18) months or more without prior SWCAA approval, or if construction 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 70A.15, 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 70A.15, 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.
K.	For the purposes of establishing if a condition of this ADP has been violated or is being violated, nothing in this ADP precludes the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test procedures or methods had been performed.

Appendix A
Source Emissions Testing Requirements
Z-Box Cyclone

1. Introduction:

- a. The purpose of this testing is to quantify emissions of PM₁₀ from the Z-Box cyclone to assure compliance with the emission limitations established in this Air Discharge Permit.

2. Testing Requirements:

- a. Source emissions testing must be conducted no later than May 31, 2029 and at least once every five years thereafter (no later than May 31st of each year in which testing is required). The use of an alternative test schedule or method must be pre-approved by SWCAA in writing.
- b. A comprehensive test plan must be submitted to SWCAA for review and approval at least 10 business days prior to testing.
- c. SWCAA must be notified of the test date at least 5 business days prior to testing.

Unless otherwise specified, testing for each constituent must consist of a minimum of three sampling runs of the duration specified below.

Constituent / Parameter	Test Method or Equivalent ¹	Minimum Test Run Duration
Stack gas velocity, flow rate	EPA Methods 1 and 2	N/A
O ₂ and CO ₂ concentrations	Ambient O ₂ and CO ₂ can be assumed	60 minutes
Stack gas moisture content	EPA Method 4	60 minutes
Filterable PM ₁₀	EPA Method 5, 17 or 201A ²	60 minutes

¹ The use of an alternate or equivalent test method must be pre-approved by SWCAA in writing.

² If EPA Method 5 or 17 is used, all PM will be assumed to be PM₁₀.

3. Source Operation:

- a. A complete record of production related parameters applicable to the testing, including but not limited to the following must be kept during emissions testing to correlate operations with emissions and must be recorded in the final report of the test results:
1. Processing rate
 2. Approximate mix of materials shredded
 3. Startups and shutdowns
- b. Source operations during emissions testing must be representative of maximum intended operating conditions.

Appendix A
Source Emissions Testing Requirements
Z-Box Cyclone

4. Reporting:

The results of all required testing must be submitted to SWCAA in an approved format within 45 days of test completion. The report must include:

- a. A description of the source including manufacturer, model number and design capacity of the equipment, and the location of the sample ports or test locations.
- b. Time and date of the test and identification and qualifications of the personnel involved.
- c. A summary of results, reported in units and averaging periods consistent with the applicable emission standard or limit.
- d. A summary of control system or equipment operating conditions.
- e. A summary of production related parameters.
- f. A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation.
- g. A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation.
- h. Copies of field data and example calculations.
- i. Chain of custody information.
- j. Calibration documentation.
- k. Discussion of any abnormalities associated with the results.
- l. A statement signed by the senior management official of the testing firm certifying the validity of the source test report.

5. Changes to Testing Requirements:

The source test must be conducted as specified in the sections above. The Permittee may submit a written request to SWCAA for approval of minor modifications to the requirements above or the testing schedule. Upon review of the request and in accordance with EPA delegation, SWCAA will inform the Permittee in writing of any approved modifications.