

November 20, 2019

Mr. Matt Hill, Safety & Environmental Director  
Norwesco LLC  
4365 Steiner Street  
St. Bonifacius, MN 55375

Subject: Final Air Discharge Permit for Modification of Molding Oven Emission Limits

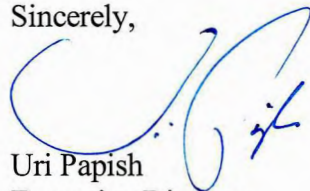
Dear Mr. Hill:

A final determination to issue Air Discharge Permit 19-3372 (ADP 19-3372) has been completed for Air Discharge Permit (ADP) Application CL-3106 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-3106 was published in the permit section of SWCAA's internet website on October 25, 2019. 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 19-3372 and the associated Technical Support Document are available for public review in the permit section of SWCAA's internet website (<http://www.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 as provided in RCW 43.21B.

If you have any comments, or desire additional information, please contact me or Wess Safford at (360) 574-3058, extension 126.

Sincerely,



Uri Papish  
Executive Director

UP:wls  
Attachment





**SWCAA**  
Southwest Clean Air Agency

**AIR DISCHARGE PERMIT  
19-3372**

**Final Date: November 20, 2019**

Facility Name: Norwesco, Inc.  
Physical Location: 3860 Grant Street  
Washougal, WA 98671

SWCAA ID: 2296

REVIEWED BY:

Paul T. Mairose, Chief Engineer



APPROVED BY:

Uri Papish, Executive Director

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## 1. Equipment/Activity Identification

ID No.	Generating Equipment/Activity	# of Units	Control Measure/Equipment	# of Units
1	Material Handling (2 Resin Silos, Grinder)	3	Dust Collector (FARR - 5,100 cfm)	1
2	Rotational Molding Oven (Eclipse - 4.8 MMBtu/hr)	1	Low sulfur fuel (Nat Gas), Proper Combustion Controls	1

## 2. Approval Conditions

The following tables detail the specific requirements of this permit. In addition to the requirements listed below, equipment at this facility may be subject to other federal, state, and local regulations. The permit requirement number is identified in the left-hand column. The text of the permit 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 Permit supersedes Air Discharge Permit 17-3253 in its entirety.

### Emission Limits

No.	Emission Limits	Equipment/Activity										
1.	<p>Emissions from the Material Handling Dust Collector must not exceed the following:</p> <table border="0"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>PM/PM<sub>10</sub></td> <td>0.96 tpy, 0.005 gr/dscf (1-hr avg)</td> </tr> </tbody> </table> <p>Annual emissions must be calculated from actual hours of operation and rated flowrate consistent with the methodology found in Section 6 of the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM/PM <sub>10</sub>	0.96 tpy, 0.005 gr/dscf (1-hr avg)	1						
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PM/PM <sub>10</sub>	0.96 tpy, 0.005 gr/dscf (1-hr avg)											
2.	<p>Emissions from the Rotational Molding Oven must not exceed the following:</p> <table border="0"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>NO<sub>x</sub></td> <td>2.81 tpy, 18 ppmv*</td> </tr> <tr> <td>CO</td> <td>3.88 tpy, 41 ppmv*</td> </tr> <tr> <td>VOC</td> <td>0.11 tpy</td> </tr> <tr> <td>PM/PM<sub>10</sub></td> <td>0.16 tpy</td> </tr> </tbody> </table> <p>* Emission concentration limits are calculated as a 1-hour average. Data must be corrected to 18% O<sub>2</sub> if measured O<sub>2</sub> is equal to or less than 19% or uncorrected if measured O<sub>2</sub> is greater than 19%.</p> <p>Annual emissions must be calculated from actual fuel consumption consistent with the methodology found in Section 6 of the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO <sub>x</sub>	2.81 tpy, 18 ppmv*	CO	3.88 tpy, 41 ppmv*	VOC	0.11 tpy	PM/PM <sub>10</sub>	0.16 tpy	2
<u>Pollutant</u>	<u>Emission Limit</u>											
NO <sub>x</sub>	2.81 tpy, 18 ppmv*											
CO	3.88 tpy, 41 ppmv*											
VOC	0.11 tpy											
PM/PM <sub>10</sub>	0.16 tpy											
3.	<p>Visible emissions must not exceed zero percent opacity for more than three minutes in any one hour period as determined by a Certified Observer certified in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).</p>	1-2										

**Operating Limits and Requirements**

No.	Operating Limits and Requirements	Equipment/ Activity
4.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facilitywide
5.	The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facilitywide
6.	Each pollution control device must be operated whenever the processing equipment served by that control device is in operation. Control devices must be operated and maintained in accordance with the manufacturer's specifications. Furthermore, control devices must be operated in a manner that minimizes emissions.	1-2
7.	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.	1-2
8.	The Rotational Molding Oven must only be fired on natural gas.	2
9.	Emissions from the natural gas fired burner in the Rotational Molding Oven must be discharged vertically above the roof level of the building containing the unit. Any device that obstructs or prevents vertical discharge is prohibited.	2
10.	Corrective action must be taken within 7 days if emission monitoring results from the Rotational Molding Oven indicate emission concentrations in excess of permitted emission limits. Corrective action includes, but is not limited to, service by maintenance personnel or retesting for each pollutant of concern using a reference test method.	2

**Monitoring and Recordkeeping Requirements**

No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity
11.	With the exception of data logged by a computerized data acquisition system, each record required by this Permit must include the date and the name of the person making the record entry. If a control device or process is not operating during a specific time period, a record must be made to that effect.	1-2
12.	All records required by this Permit must be kept for a minimum period of no less than three years and must be maintained in a form readily available for inspection by SWCAA representatives.	1-2
13.	Excess emissions and upset conditions must be recorded for each occurrence.	1-2

No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity								
14.	<p>The following information must be collected and recorded as specified below:</p> <table border="0"> <tr> <td data-bbox="188 275 889 310">(a) Hours of dust collector operation</td> <td data-bbox="896 275 1328 310">Recorded annually</td> </tr> <tr> <td data-bbox="188 312 889 348">(b) Molding oven fuel consumption</td> <td data-bbox="896 312 1328 348">Recorded annually</td> </tr> <tr> <td data-bbox="188 350 889 386">(c) Maintenance and repair activities</td> <td data-bbox="896 350 1328 386">Recorded for each occurrence</td> </tr> <tr> <td data-bbox="188 388 889 491">(d) Air quality related complaints received by the permittee and the results of any subsequent investigation or corrective action</td> <td data-bbox="896 388 1328 491">Recorded for each occurrence</td> </tr> </table>	(a) Hours of dust collector operation	Recorded annually	(b) Molding oven fuel consumption	Recorded annually	(c) Maintenance and repair activities	Recorded for each occurrence	(d) Air quality related complaints received by the permittee and the results of any subsequent investigation or corrective action	Recorded for each occurrence	1-2
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(d) Air quality related complaints received by the permittee and the results of any subsequent investigation or corrective action	Recorded for each occurrence									

### Emission Monitoring and Testing Requirements

No.	Emission Monitoring and Testing Requirements	Equipment/ Activity
15.	The Rotational Molding Oven must be emission monitored annually as described in Appendix A of this Permit.	2

### Reporting Requirements

No.	Reporting Requirements	Equipment/ Activity
16.	All air quality related complaints received by the permittee must be reported to SWCAA within three days of receipt.	Facilitywide
17.	<p>Excess emissions must be reported to SWCAA as follows:</p> <ul style="list-style-type: none"> <li>• As soon as possible, but no later than 12 hours after discovery for emissions that represent a potential threat to human health or safety;</li> <li>• 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</li> <li>• No later than 30 days after the end of the month of discovery for all other excess emissions.</li> </ul>	Facilitywide
18.	<p>The permittee must notify SWCAA at least seven days in advance of the use of any new material, which results in the emission of toxic or hazardous air pollutants not listed in Section 6 of the Technical Support Document for this Permit. In response to the notification, SWCAA may require that a written report be submitted with the following:</p> <ol style="list-style-type: none"> <li>(a) A description of the proposed change(s) in materials with an MSDS 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> </ol> <p>If the proposed emission rate of a new TAP exceeds the applicable SQER and/or other emission limits established by this Permit or otherwise circumvents an applicable requirement, New Source Review may be required prior to making the proposed change.</p>	Facilitywide

No.	Reporting Requirements	Equipment/ Activity
19.	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.	1-2
20.	An annual emissions inventory report must be submitted in accordance with SWCAA 400-105(1). In addition to the emissions information required under SWCAA 400-105(1), each annual report must include an estimate of annual emission quantities for each TAP compound listed in the Technical Support Document for this Permit.	1-2
21.	The following information must be reported to SWCAA no later than March 15 <sup>th</sup> for the previous calendar year: (a) Hours of dust collector operation; (b) Molding oven fuel consumption; and (c) Air emissions of criteria air pollutants, volatile organic compounds, and toxic air pollutants (TAPs).	1-2
22.	Emission monitoring results must be reported to SWCAA in writing within 15 days of completion.	2
23.	The permittee must notify SWCAA in writing within ten (10) days after completing installation of the replacement molding oven burner. This will allow proper inspections and observations to be conducted for the new equipment	2

### 3. General Provisions

No.	General Provisions
A.	For the purpose of ensuring compliance with this Permit, 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 Permit and applicable regulations and to perform or require such tests as may be deemed necessary.
B.	The provisions, terms and conditions of this Permit 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 Permit survive any transfer of ownership of the source or any portion thereof.
D.	This Permit must be posted conspicuously at or be readily available near the source.
E.	This Permit does not supersede requirements of other Agencies with jurisdiction and further, this Permit does not relieve the permittee of any requirements of any other governmental Agency. In addition to this Permit, the permittee may be required to obtain permits or approvals from other agencies with jurisdiction.
F.	Compliance with the terms of this Permit 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.
G.	If any provision of this Permit is held to be invalid, all unaffected provisions of the Permit will remain in effect and be enforceable.

No.	General Provisions
H.	No change in this Permit 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.
I.	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 Permit, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act.



**Air Discharge Permit 19-3372 - Appendix A**  
**Emission Monitoring Requirements**  
**Rotational Molding Oven**

**1. Introduction:**

- a. The purpose of periodically monitoring exhaust from the molding oven is to minimize emissions and provide a reasonable assurance that the oven is operating properly.
- b. Periodic monitoring may be conducted with an electrochemical cell combustion analyzer, analyzers used for reference method testing, or other analyzers pre-approved by SWCAA.

**2. Monitoring Procedure:**

- a. Monitoring of molding oven exhaust gases to determine emission concentrations of the constituents listed below must be conducted no later than the end of April, 2020. Subsequent emission monitoring must be conducted on a 12 month cycle, no later than the end of April each year.

Constituents to be Measured

Carbon Monoxide (CO)

Nitrogen Oxides (NO<sub>x</sub>)

Oxygen (O<sub>2</sub>)

- b. Source operation during emission monitoring must be representative of maximum intended operating conditions.
- c. Alternative testing methodologies must be pre-approved by SWCAA.

**3. Minimum Quality Assurance/Quality Control Measures:**

- a. The analyzer(s) response to span gas of a known concentration shall be determined before and after testing. No more than 12 hours may elapse between span gas response checks. The results of the analyzer response shall not be valid if the difference between the pre and post response check results vary by more than 10% of the initial span gas value.
- b. The CO and NO<sub>x</sub> span gas concentrations shall be no less than 50% and no more than 200% of the emission concentration corresponding to the permitted emission limit. A lower concentration span gas may be used if it is more representative of measured concentrations. Ambient air may be used to zero the CO and NO<sub>x</sub> cells/analyzer(s) and span the oxygen cell/analyzer.
- c. Sampling shall consist of at least 1 test consisting of at least 5 minutes of data collection. Data shall not be collected until after analyzer readings have stabilized (less than 5% per minute change in emission concentration). Emission concentrations shall be recorded at least once every 30 seconds during the data collection phase for a minimum of 10 readings. All test data collected following the ramp-up phase(s) shall be reported to SWCAA in the designated format.

**Air Discharge Permit 19-3372 - Appendix A**  
**Emission Monitoring Requirements**  
**Rotational Molding Oven**

**4. Reporting:**

- a. All monitoring results must be recorded at the facility and reported to SWCAA in writing using a format designated by the Agency. Results must be reported within 15 calendar days of completion. The following information must be included in the report:
  - (1) Time and date of the performance monitoring;
  - (2) Identification of the personnel involved;
  - (3) Identification of the affected unit;
  - (4) A summary of results (NO<sub>x</sub>, CO, O<sub>2</sub>, etc), reported in units consistent with the applicable emission standard or limit;
  - (5) A summary of equipment operating conditions (e.g., firing rate, fuel flow, stack temperature, etc);
  - (6) A description of the evaluation methods or procedures used including all field data, quality assurance/quality control procedures and documentation; and
  - (7) Analyzer response check documentation.
  
- b. Individual monitoring results must be reported as read. Final average monitoring results must be corrected to 3% O<sub>2</sub> in the exhaust gas and adjusted to reflect analyzer response to zero and span gases.

**5. Changes to Testing Requirements:**

Minor modifications to the requirements above may be requested by the Permittee or their representative. Modifications must be pre-approved by SWCAA.

**State Environmental Policy Act**

**DETERMINATION OF SEPA EXEMPT - SWCAA 19-047**

**Description of proposal:**

ADP Application CL-3106: Modification of emission limits for an existing rotational molding oven. The affected molding oven recently had its burner replaced (ADP 17-3253, ADP Application CL-3031). Emission limits for the replacement burner were established based on available manufacturer's information. Subsequent to installation, the new burner proved incapable of complying with the established emission limits for NO<sub>x</sub> and CO. This action modifies the existing emission limits to reflect actual burner performance, but does not increase unit capacity or change associated facility operations. The action is exempt from SEPA requirements pursuant to WAC 197-11-800(3) since it only involves minor alteration of existing permit requirements and does not involve material expansions or changes in use.

**Proponent:** Norwesco, LLC (Matt Hill, Safety & Environmental Director)

**Location of proposal, including street address if any:**  
3860 Grant Road, Washougal, WA 98671

**Lead agency:** Southwest Clean Air Agency

The lead agency for this proposal has determined that the proposed project is exempt from SEPA under WAC 197-11-800(3) as follows: "The repair, remodeling, maintenance, or minor alteration of existing private or public structures, facilities or equipment, including utilities, recreation, and transportation facilities involving no material expansions or changes in use beyond that previously existing; ..." The proposed project is identified as maintenance of existing equipment and as such it does not have a probable significant impact on the environment. Neither an environmental checklist nor an environmental impact statement (EIS) is required under RCW 43.21C.030(2)(c). This decision was made by the lead agency after review of the proponent's proposal and the information on file with the lead agency. This information is available to the public on request.

This project/permitting action by SWCAA is SEPA exempt.

**Responsible official:** Paul T. Mairose, P.E.  
**Position/title:** Chief Engineer

**Address:** Southwest Clean Air Agency  
11815 NE 99<sup>th</sup> St, Suite 1294  
Vancouver, WA 98682-2322  
**Phone:** (360) 574-3058, ext 130

Signature: 

Date: 11/20/19

