



August 3, 2021

Mr. Nicholas Kamerath
Arch Wood Protection
532 Hendrickson Drive
Kalama, Washington 98625

Subject: Final Approval for New Products, Transloading, and Mixing Operations

Dear Mr. Kamerath:

A final determination to issue Air Discharge Permit 21- 3476 has been completed for Air Discharge Permit Application CL-3158 pursuant to Section 400-110(4) of the General Regulations for Air Pollution Sources of the Southwest Clean Air Agency (SWCAA). Public notice for Air Discharge Permit Application CL-3158 was published on SWCAA's internet website April 16, 2021. 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 Air Discharge Permit 21-3476 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 Danny Phipps at (360) 574-3058, extension 124.

Sincerely,

Uri Papish
Executive Director

UP: dp
Enclosures



SOUTHWEST CLEAN AIR AGENCY

**AIR DISCHARGE PERMIT
SWCAA 21-3476**

Issued: August 3, 2021

Facility Name: Arch Wood Protection
Physical Location: 532 Hendrickson Drive
Kalama, Washington 98625

SWCAA ID: 1264

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	Pack A, B, PT, Myocostat-MX, Checkmate, and Ferrobrite MX Production (MEA, & Pack A transfer and storage), Pack PT Transfer and Storage, CCA Transloading	7 tanks	Scrubber System (venturi scrubber/inductor followed by packed bed)	1
2	ACZA Transloading	1		4
3	Mixing Tank Production	5 tanks	None	N/A
4	Cooling Tower	1	Copper Monitoring	N/A

2. Permit Terms and Conditions

The following tables detail the specific terms and conditions of this Air Discharge Permit (ADP). In addition to the requirements listed below, equipment at this facility may be subject to additional federal, state, and local regulations. The permit term or requirement number is identified in the left hand column. The permit term or requirement is contained in the middle column. The emission unit, equipment, or activity (by identification No.) to which the permit term or condition applies is identified in the right hand column.

Air Discharge Permit 19-3375 is superseded in its entirety by this Air Discharge Permit.

Emission Limits

No.	Emission Limits	Equipment/Activity									
1.	Facilitywide VOC emissions must not exceed 1,600 pounds per year. Emissions must be determined based on the methodology outlined in Section 6 of the Technical Support Document for this Permit.	Facilitywide									
2.	<p>Combined emissions from Pack A production and associated operations must not exceed:</p> <table> <tr> <td><u>Pollutant</u></td><td><u>lb/batch Pack A</u></td><td><u>Pounds per year</u></td></tr> <tr> <td>Ethanolamine</td><td>0.005</td><td>394</td></tr> <tr> <td>Volatile Organic Compounds (VOCs)</td><td>0.005</td><td>394</td></tr> </table> <p>Annual emissions must be determined based on the methodology outlined in Section 6 of the Technical Support Document for this Permit. Batch emissions are assumed to be equivalent to the emission limit above. In the event that source emission testing is completed in accordance with a source test approved by SWCAA a new emission factor may be developed, with SWCAA approval.</p>	<u>Pollutant</u>	<u>lb/batch Pack A</u>	<u>Pounds per year</u>	Ethanolamine	0.005	394	Volatile Organic Compounds (VOCs)	0.005	394	1
<u>Pollutant</u>	<u>lb/batch Pack A</u>	<u>Pounds per year</u>									
Ethanolamine	0.005	394									
Volatile Organic Compounds (VOCs)	0.005	394									

No.	Emission Limits	Equipment/ Activity
3.	<p>Ammonia emissions from ACZA transfer operations must not exceed:</p> <p>(a) 2.0 pounds per hour (1-hour average);</p> <p>(b) 800 ppmvd (1-hour average); and</p> <p>(c) 95 pounds per year.</p> <p>Annual emissions must be determined based on the methodology outlined in Section 6 of the Technical Support Document for this Permit until test data is collected in accordance with the requirements in this Air Discharge Permit. Hourly emissions must be calculated using the emission concentration measured at the scrubber outlet and the measured stack flow from the most recent source emissions test.</p>	2
4.	<p>Visible emissions from all points of discharge must not exceed zero percent opacity for more than 3 minutes in any one hour period as determined in accordance with SWCAA Method 9 (see Appendix A of SWCAA 400).</p>	Facilitywide

Operating Limits and Requirements

No.	Operating Limits and Requirements	Equipment/ Activity
5.	<p>The scrubber liquor in the packed bed scrubber must be replaced once every 12 batches of production.</p>	1
6.	<p>The packed bed scrubber liquor flow rate must be no less than 35 gpm during production/operation.</p>	1, 2
7.	<p>The venturi scrubber liquor flow rate must be no less than 250 gpm during production/operation.</p>	1, 2
8.	<p>The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.</p>	Facilitywide
9.	<p>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.</p>	Facilitywide
10.	<p>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.</p>	Facilitywide

Monitoring and Recordkeeping Requirements

No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity
11.	The scrubber system must be inspected before the first use of Tank R-2 for the production of Pack A, and at least once every 12 months thereafter. At a minimum, the inspection must include confirming the scrubbing components are in working order, including a visual inspection of the scrubber packing, demister, and spray pattern on the packed bed scrubber.	1, 2
12.	The cooling tower water must be tested for the presence of elevated levels of copper at least once per week. The test method must be capable of detecting copper at 20 ppm or less. A copper test strip or test paper may be used. If copper is detected at or above 20 ppm, the source of the copper must be investigated immediately to ensure the source is not a leak from Tank R-2.	4
13.	<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 number of batches of Pack A produced must be logged for each calendar year; (b) The total amount of each product produced at the facility must be logged for each calendar year; (c) The total amount of natural gas used at the facility must be recorded for each calendar year. This information may be gathered from billing data; (d) Maintenance activities that may affect emissions, including scrubber water changes, must be logged for each occurrence; (e) Excess emissions must be recorded for each occurrence; and (f) 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. 	Facilitywide
14.	With the exception of data logged electronically, each record required by this Air Discharge Permit must include the date and the identity of the person making the record entry.	Facilitywide
15.	All records required by this Air Discharge Permit must be available on site for a minimum period of no less than three years and must be available for inspection by SWCAA representatives.	Facilitywide

Reporting Requirements

No.	Reporting Requirements	Equipment/ Activity
16.	<p>SWCAA must be notified at least seven days in advance of the use of any new material that will result in increases in emissions of toxic or hazardous air pollutants listed in section 6 of the Technical Support Document for this permit, or the emission of a toxic air pollutant not listed in Section 6. The written notice must include the following:</p> <ul style="list-style-type: none"> (a) A description of the proposed change(s) in materials with a Safety Data Sheet for each new material; (b) The date the change(s) is (are) to be made; (c) The change(s) in emissions of VOC, HAP and TAP compounds occurring as a result of the change; and (d) A summary of any requirement(s) that would apply as a result of the change(s). <p>If the proposed emission rate of a TAP exceeds one or more SQERs and/or the TAP or VOC emission limits established by this permit or otherwise circumvents an applicable requirement including those established by this permit, New Source Review will be required prior to making the proposed change. The New Source Review must include an evaluation of BACT.</p>	Facilitywide
17.	<p>Excess emissions must be reported to SWCAA as follows:</p> <ul style="list-style-type: none"> (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. 	Facilitywide
18.	Deviations from permit conditions must be reported no later than 30 days after the end of the month during which the deviation is discovered.	Facilitywide
19.	<p>The following emission-related information must be reported to SWCAA by March 15th for the previous calendar year:</p> <ul style="list-style-type: none"> (a) The total number of batches of Pack A produced; (b) The total amount of each product produced; (c) The total amount of natural gas used at the facility. This information may be gathered from billing data; and (d) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs). 	Facilitywide

3. General Provisions

No.	General Provisions
A.	The equipment specified 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.

No.	General Provisions
B.	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.
C.	The provisions, terms and conditions of this Permit shall be deemed to bind the permittee, its officers, directors, agents, servants, employees, successors and assigns, and all persons, firms, and corporations acting under or for the permittee.
D.	The requirements of this Permit shall survive any transfer of ownership of the source or any portion thereof.
E.	This Permit must be posted conspicuously at or be readily available near the source.
F.	Approval to construct, install, or modify specific pollution generating equipment becomes invalid if construction or installation is not commenced within eighteen months after the date of issuance of this Permit, if construction or installation is discontinued for a period of eighteen months or more, or if construction or installation is not completed within a reasonable time.
G.	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.
H.	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 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.
I.	If any provision of this Permit is held to be invalid, all unaffected provisions of the Permit shall remain in effect and be enforceable.
J.	No change in this Permit shall 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.
K.	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 Permit, 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 21-024

Description of proposal:

ADP Application L-3158: New products, transloading, and mixing operations. Applicant proposes to produce new products, and produce products, which had previously been imported. The proposed project does not involve any excavation, building construction or change in land use. Existing repair and service operations will continue unchanged. Impact on media other than air will be negligible. Air impact will be minimized by operational limits in SWCAA's air discharge permit.

Proponent: Arch Wood Protection (Nicholas Kamerath, Site Operations Manager)

Location of proposal, including street address if any:

532 Hendrickson Drive in Kalama, WA 98625

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 after using the optional DNS process in WAC 197-11-355. There is no further comment period in the 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 99th St, Suite 1294
Vancouver, WA 98682-2322

Phone: (360) 574-3058, ext 130

Signature: Paul T. Mairose

Date: 8/3/2021

