



March 8, 2022

Mr. Jarrod Wickum, President
Wickum Weld, Inc.
2100 Kotobuki Way
Vancouver, WA 98660

Subject: Final Air Discharge Permit for New Powder Coating Line

Dear Mr. Wickum:

A final determination to issue Air Discharge Permit 22-3504 (ADP 22-3504) has been completed for Air Discharge Permit (ADP) Application CL-3182 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-3182 was published in the permit section of SWCAA's internet website on February 4, 2022. 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 22-3504 and the associated Technical Support Document are available for public review in the permit section of SWCAA's internet website (<http://www.swcleanair.gov/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 – ADP 22-3504 and Technical Support Document





SWCAA
Southwest Clean Air Agency

AIR DISCHARGE PERMIT
22-3504

Issued: March 8, 2022

Facility Name: Wickum Weld
Physical Location: 2100 Kotobuki Way
Vancouver, WA 98660

SWCAA ID: 2727

REVIEWED BY:

Clint Lamoreaux, Acting Chief Engineer

APPROVED BY:

Uri Papish, Executive Director



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1. Equipment/Activity Identification

ID No.	Generating Equipment/Activity	Control Measure/Equipment
1	Metal Fabrication/Welding	Building Enclosure
2	Powder Coat Booth (Rohner – 6,000 acfm)	Process Enclosure, High Efficiency Filtration
3	Powder Coat Oven (Rohner – 0.999 MMBtu/hr)	Low Sulfur Fuel (Nat Gas)

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.

Emission Limits

No.	Emission Limits	Equipment/ Activity						
1.	<p>Toxic air pollutant emissions must not individually exceed the Small Quantity Emission Rate identified for that pollutant in WAC 173-460 as in effect August 21, 1998.</p> <p>Emissions must be calculated using the methodology described in the Technical Support Document for this Air Discharge Permit.</p>	Facility-wide						
2.	<p>Emissions from welding operations must not exceed:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>PM₁₀</td><td>0.04 tpy</td></tr><tr><td>PM_{2.5}</td><td>0.04 tpy</td></tr></table> <p>Annual emissions must be calculated from actual weld rod consumption consistent with the methodology described in the Technical Support Document for this Air Discharge Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM ₁₀	0.04 tpy	PM _{2.5}	0.04 tpy	1
<u>Pollutant</u>	<u>Emission Limit</u>							
PM ₁₀	0.04 tpy							
PM _{2.5}	0.04 tpy							
3.	<p>Emissions from Powder Coat Booth operation must not exceed:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>PM₁₀</td><td>0.01 tpy</td></tr><tr><td>PM_{2.5}</td><td>0.01 tpy</td></tr></table> <p>Annual emissions must be calculated from actual powder coat throughput consistent with the methodology described in the Technical Support Document for this Air Discharge Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM ₁₀	0.01 tpy	PM _{2.5}	0.01 tpy	2
<u>Pollutant</u>	<u>Emission Limit</u>							
PM ₁₀	0.01 tpy							
PM _{2.5}	0.01 tpy							

No.	Emission Limits	Equipment/ Activity												
4.	<p>Emissions from Powder Coat Oven operation must not exceed:</p> <table><tr><th><u>Pollutant</u></th><th><u>Emission Limit</u></th></tr><tr><td>NO_x</td><td>0.53 tpy</td></tr><tr><td>CO</td><td>0.16 tpy</td></tr><tr><td>VOC</td><td>0.02 tpy</td></tr><tr><td>PM₁₀</td><td>0.03 tpy</td></tr><tr><td>PM_{2.5}</td><td>0.03 tpy</td></tr></table> <p>Annual emissions must be calculated from actual fuel consumption consistent with the methodology described in the Technical Support Document for this Air Discharge Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO _x	0.53 tpy	CO	0.16 tpy	VOC	0.02 tpy	PM ₁₀	0.03 tpy	PM _{2.5}	0.03 tpy	3
<u>Pollutant</u>	<u>Emission Limit</u>													
NO _x	0.53 tpy													
CO	0.16 tpy													
VOC	0.02 tpy													
PM ₁₀	0.03 tpy													
PM _{2.5}	0.03 tpy													
5.	Visible emissions from approved operations must not exceed 0% 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).	1-3												

Operating Limits and Requirements

No.	Operating Limits and Requirements	Equipment/ Activity
6.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
7.	The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facility-wide
8.	Each pollution control device/measure must be in use whenever the associated production equipment is in operation. Control devices must be operated and maintained in accordance with the manufacturer's specifications and operated in a manner that minimizes emissions.	1-3
9.	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.	1-3
10.	All welding must be performed inside a building envelope.	1
11.	All powder coating must be performed in the Powder Coat Booth. Airflow through the Powder Coat Booth must be adequate to contain powder overspray within the booth at all times while coating is being performed.	2
12.	The exhaust of the Powder Coat Booth must be equipped with properly fitted particulate filters. Particulate filters must be certified to ASHRAE MERV 14 or better or be certified to provide at least 98 percent capture efficiency. Where two or more layers of filters are used, the combined filtration must be equivalent to a MERV of 14 or the combined capture efficiency must be at least 98%.	2

No.	Operating Limits and Requirements	Equipment/ Activity
13.	Exhaust air from the Powder Coat Oven must be discharged vertically into the ambient air above the level of the building roof. Any device that obstructs or prevents vertical discharge is prohibited.	3

Monitoring and Recordkeeping Requirements

No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity												
14.	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												
15.	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.	1-3												
16.	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.	1-3												
17.	Excess emissions and upset conditions must be recorded for each occurrence.	1-3												
18.	<div>The following information must be collected, recorded at the intervals specified below, and maintained readily available on-site for inspection:</div> <table><tr><td>(a) Quantity and type of weld rod used in welding operations</td><td>Recorded annually</td></tr><tr><td>(b) Quantity and type of powder coating applied in Powder Coat Booth</td><td>Recorded annually</td></tr><tr><td>(c) Quantity of natural gas used in Powder Coat Oven</td><td>Recorded annually</td></tr><tr><td>(d) Make, model and filtration efficiency of filters used in the Powder Coat Booth</td><td>Recorded for each filter</td></tr><tr><td>(e) Maintenance and repair activities that may affect emissions</td><td>Recorded for each occurrence</td></tr><tr><td>(f) Safety Data Sheets (SDS) or equivalent for all powder coating products in use</td><td>Maintained for each product</td></tr></table>	(a) Quantity and type of weld rod used in welding operations	Recorded annually	(b) Quantity and type of powder coating applied in Powder Coat Booth	Recorded annually	(c) Quantity of natural gas used in Powder Coat Oven	Recorded annually	(d) Make, model and filtration efficiency of filters used in the Powder Coat Booth	Recorded for each filter	(e) Maintenance and repair activities that may affect emissions	Recorded for each occurrence	(f) Safety Data Sheets (SDS) or equivalent for all powder coating products in use	Maintained for each product	1-3
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(f) Safety Data Sheets (SDS) or equivalent for all powder coating products in use	Maintained for each product													

Emission Monitoring and Testing Requirements

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

Reporting Requirements

No.	Reporting Requirements	Equipment/ Activity
19.	<p>All air quality related complaints received by the permittee must be reported to SWCAA within three days of receipt. Complaint reports must include the following information:</p> <ul style="list-style-type: none"> (a) Date and time of the complaint; (b) Name of the complainant; (c) Nature of the complaint; and (d) Description of corrective action taken in response to complaint (if any). 	Facility-wide
20.	<p>The permittee must notify SWCAA at least seven calendar days in advance of the use of any new material, which results in the emission of toxic or hazardous air pollutants 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> <ul style="list-style-type: none"> (a) A description of the proposed change(s) in materials with an SDS for each new material; (b) The date the change(s) is (are) to be made; (c) The change(s) in emissions of VOCs, HAPs and TAPs occurring as a result of the change; and (d) A summary of any applicable requirement(s) that would apply as a result of the change(s). <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>	Facility-wide
21.	<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; and (c) No later than 30 days after the end of the month of discovery for all other excess emissions. 	1-3
22.	Initial start-ups of SWCAA approved emission units must be reported to SWCAA via letter within 10 days	2-3
23.	<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) Quantity and type of weld rod used in welding operations; (b) Quantity and type of powder coating applied in Powder Coat Booth; (c) Quantity of natural gas used in Powder Coat Oven; and (d) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs). 	1-3

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 will be invalid if construction has not commenced within eighteen (18) months from date of issuance, if construction is discontinued for a period of eighteen (18) months or more, or if construction is not completed within a reasonable time.
F.	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.
G.	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 70.15A, 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 Permit is held to be invalid, all unaffected provisions of the Permit will remain in effect and be enforceable.
I.	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.
J.	The Southwest Clean Air Agency may, in accordance with RCW 70.15A 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.