

June 22, 2022

Wayne Smith, Vice President of Operations
Pro Tech Industries Inc.
14113 NE 3rd Court
Vancouver, WA 98685

RE: Final Air Discharge Permit for Existing Pickup Truck Attachment Manufacturing Facility.

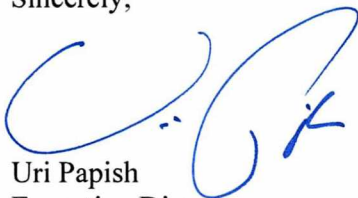
Dear Mr. Smith:

A final determination to issue Air Discharge Permit (ADP) 22-3520 has been completed for ADP application CL-3176 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-3176 was published in the permit section of SWCAA's website on September 21, 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 ADP 22-3520 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 22-3520 may be appealed directly to the Pollution Control Hearings Board (PCHB) at P.O. Box 40903, Olympia, Washington 98504-0903 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 Danny Phipps at (360) 574-3058, extension 124.

Sincerely,



Uri Papish
Executive Director

UP:edp

Enclosure: Technical Support Document and Air Discharge Permit 22-3520





SWCAA
Southwest Clean Air Agency

**AIR DISCHARGE PERMIT
22-3520**

Issued: June 22, 2022

ProTech Industries Inc.
14113 NE 3rd Court
Vancouver, WA 98685

SWCAA ID – 1893



REVIEWED BY:

Clinton H. Lamoreaux

Clinton Lamoreaux, Chief Engineer

APPROVED BY:

Uri Papish

Uri Papish, Executive Director

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1. Equipment/Activity Identification

ID No.	Equipment/Activity	Control Equipment/Measure
1	Powder Coating	Booth with Filtration
2	Polyurea Coating	Booth with Filtration
3	Curing Ovens, Pressure Washer, Welding	Low Sulfur Fuel (Natural Gas)
4	Welding	Dust Hog Fume Collection System

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 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

Emission Limits		Equipment/ Activity ID No.						
Req.	Emission Limits							
1.	<p>Emissions from the powder coating booth panel filters must not exceed the following:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>PM/PM₁₀</td><td>0.060 tons per year</td></tr><tr><td>PM_{2.5}</td><td>0.047 tons per year</td></tr></table> <p>The long-term emission limits are 12-month rolling sums calculated consistent with Section 6 of the TSD for this ADP.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM/PM ₁₀	0.060 tons per year	PM _{2.5}	0.047 tons per year	1
<u>Pollutant</u>	<u>Emission Limit</u>							
PM/PM ₁₀	0.060 tons per year							
PM _{2.5}	0.047 tons per year							
2.	<p>Emissions from the polyurea coating usage must not exceed the following:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>PM/PM₁₀</td><td>0.010 tons per year</td></tr><tr><td>PM_{2.5}</td><td>0.0077 tons per year</td></tr></table> <p>The long-term emission limits are 12-month rolling sums calculated consistent with Section 6 of the TSD for this ADP.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM/PM ₁₀	0.010 tons per year	PM _{2.5}	0.0077 tons per year	2
<u>Pollutant</u>	<u>Emission Limit</u>							
PM/PM ₁₀	0.010 tons per year							
PM _{2.5}	0.0077 tons per year							

Req.	Emission Limits	Equipment/ Activity ID No.								
3.	<p>Emissions from natural gas combustion must not exceed any of the following:</p> <table><tr><th colspan="2">Pollutant</th></tr><tr><td>Nitrogen Oxides</td><td>0.64 tpy</td></tr><tr><td>Carbon Monoxide</td><td>0.54 tpy</td></tr></table> <p>The long-term emission limits are 12-month rolling sums calculated consistent with Section 6 of the TSD for this ADP.</p>	Pollutant		Nitrogen Oxides	0.64 tpy	Carbon Monoxide	0.54 tpy	3		
Pollutant										
Nitrogen Oxides	0.64 tpy									
Carbon Monoxide	0.54 tpy									
4.	<p>Total welding rod usage must not exceed the following:</p> <table><tr><th>Type</th><th>Total Pounds</th></tr><tr><td>Aluminum</td><td>30,000</td></tr><tr><td>Steel (except stainless)</td><td>14,000</td></tr><tr><td>Stainless Steel</td><td>5,000</td></tr></table>	Type	Total Pounds	Aluminum	30,000	Steel (except stainless)	14,000	Stainless Steel	5,000	4
Type	Total Pounds									
Aluminum	30,000									
Steel (except stainless)	14,000									
Stainless Steel	5,000									
5.	<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>Annual emissions must be calculated using the methodology consistent with Section 6 of the TSD for this ADP.</p>	Facility-wide								
6.	<p>Visible emissions from the 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>	1-4								

Operating Limits and Requirements

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
7.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
8.	Operations that cause or contribute to a nuisance odor must use recognized good practice and procedures to reduce these odors to a reasonable minimum.	Facility-wide
9.	Emission units and activities identified in this ADP must be maintained and operated in total and continuous conformity with the conditions identified 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.	Facility-wide

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
10.	Each pollution control device must be operated whenever the processing equipment served by that air pollution control device is in operation. Control devices must be operated and maintained in accordance with the manufacturer's specifications. Furthermore, air pollution control devices must be operated in a manner that minimizes emissions.	1-4
11.	All powder coating must be performed in the Powder Coating Booth. Airflow through the Powder Coating Booth must be adequate to contain all overspray within the booth at all times when the booth is in use.	1
12.	All spray coating must be performed in the Polyurea Coating Booth. Airflow through the Polyurea Coating Booth must be adequate to always contain all overspray within the booth when the booth is in use.	2
13.	A differential pressure gauge must be installed and maintained to measure the pressure drop across the Powder Coating and Spray Booth exhaust filter media.	1-2
14.	The Powder Coating and Polyurea Coating Booth must be equipped with properly fitted particulate matter filters on the exhaust that are demonstrated to provide at least 98 percent capture of coating overspray as determined using ASHRAE Method 52.1 or an equivalent method approved by SWCAA, or the filters must be certified to ASHRAE MERV 14 or better. Where two or more layers of filters are used, the combined capture efficiency must be at least 98 percent or the combined filtration must achieve a minimum MERV of 14.	1-2
15.	The Dust Hog Fume collection system must be equipped with filters certified to ASHRAE MERV 15 or better.	4

Monitoring and Recordkeeping Requirements

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
16.	The Permittee must maintain purchase receipts and Safety Data Sheets (SDS) or technical data sheet information for all coating products consumed at the facility in a readily accessible form for a minimum of three years after the material is no longer in use at the facility.	Facility-wide
17.	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.	Facility-wide
18.	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

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
19.	<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 each coating purchased must be recorded for each calendar year; (b) The differential pressure across the Powder Coating Booth and Polyurea Coating Booth filter banks must be recorded for each week of operation. If either of the booths are not in use during a specific week, a record must be made to that effect; (c) The total amount of natural gas used by the facility must be recorded for each calendar year; (d) Maintenance activities that may affect emissions from the Powder Coating Booth, Polyurea Coating Booth or the Curing Ovens must be logged for each occurrence. Filter changes in the Powder Coating Booth and Polyurea Coating Booth are maintenance events that must be logged; (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. 	Facility-wide

Emission Monitoring and Testing Requirements

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

Reporting Requirements

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
20.	Upset conditions must be reported to SWCAA as soon as possible after discovery. Outside of normal business hours, upset conditions may be reported by sending a fax or leaving a telephone message with SWCAA.	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 twelve (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 forty-eight (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 thirty (30) calendar days after the end of the month of discovery for all other excess emissions. 	Facility-wide
22.	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.	Facility-wide

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
23.	<p>An annual emissions inventory report must be submitted to SWCAA by March 15 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"> (a) The quantity of each coating consumed. The Permittee may (is not required to) assume that consumables were used during the year purchased; (b) The quantity of natural gas consumed by the Curing Ovens and Pressure Washer; (c) Total amount in pounds of aluminum, steel, and stainless-steel welding wire; and (d) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs). 	Facility-wide
24.	<p>A written report must be submitted to SWCAA at least seven (7) calendar days prior to the use of any new product that contains TAPs, or HAPs. The report must contain the following:</p> <ul style="list-style-type: none"> (a) A description of the type of product (e.g. resin, paint, solvent, etc.), the Safety Data Sheets and Technical Data Sheets, and the location where the product will be used; (b) The date by which the Permittee intends to begin use of the product; (c) The amount (gallons or lb) expected to be used; (d) A quantification of the change in VOC, HAP and TAP emissions from the use of the product; and (e) A summary of any applicable requirement that would apply as a result of the product. <p>If the new product would cause any emission limit to be exceeded, the Permittee must submit an ADP application to SWCAA to request a revision to this ADP. The Permittee must not begin using the new product until a revised permit is issued.</p> <p>Any new product that is only to be used for testing purposes with a quantity of five (5) gallons or less of usage does not need to be reported to SWCAA prior to use.</p>	Facility-wide

3. General Provisions

Req. No.	General Provisions
A.	<p>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.</p>
B.	<p>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.</p>

Req. No.	General Provisions
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.	This ADP will be invalid 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, 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.

