

July 7, 2022

Jay Rogers  
Pratt Retail Specialties  
3201 SE Columbia Way  
Vancouver, WA 98661

RE: Final Air Discharge Permit for New Bag Making Facility

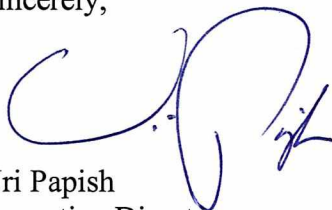
Dear Mr. Rogers:

A final determination to issue Air Discharge Permit (ADP) 22-3523 has been completed for ADP Application CL-3196 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-3196 was published in the permit section of SWCAA's website on May 25, 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 22-3523 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 22-3523 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 Vannessa McClelland at (360) 574-3058, extension 129.

Sincerely,



Uri Papish  
Executive Director

UP:vm

Enclosure: Technical Support Document and Air Discharge Permit 22-3523





**SWCAA**  
Southwest Clean Air Agency

**AIR DISCHARGE PERMIT  
22-3523**

**Issued: July 7, 2022**

**Pratt Retail Specialties**  
3201 SE Columbia Way  
Vancouver, WA 98661

**SWCAA ID – 2758**

REVIEWED BY:

Clinton Lamoreaux, Chief Engineer



APPROVED BY:

Uri Papish, Executive Director

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**1. Equipment/Activity Identification**

<b>ID No.</b>	<b>Equipment/Activity</b>	<b>Control Equipment/Measure</b>
1	Six (6) Sunhope Bag Making Machines, model SBH330B	Low VOC inks and adhesives
2	One (1) Holweg Weber Bag Making Machine, model 833A	Low VOC inks and adhesives
3	Reel-to-Reel Flexo Printing Machine	Low VOC inks
4	Four Space Heaters	Low sulfur fuel (natural gas)

**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.

**Emission Limits**

Req. No.	Emission Limits	Equipment/ Activity ID No.												
1.	<p>Emissions from printing and gluing operations must not exceed the following:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>VOC</td><td>11.02 tons per year</td></tr><tr><td>Acetaldehyde</td><td>253.0 pounds per year</td></tr><tr><td>Ethanolamine</td><td>5,260.0 pounds per year</td></tr><tr><td>Formaldehyde</td><td>71.0 pounds per year</td></tr><tr><td>All other TAPs</td><td>Limited to SQER for each pollutant except those listed above. Combined TAPs (not including acetone or other non-VOC TAPs) must not exceed the VOC emission limit established above</td></tr></table> <p>Emissions must be calculated based on actual material consumption, manufacturer's material data, and material balance methodology consistent with Section 6 of the Technical Support Document (TSD) for this ADP. The material balance must include ink, glues, and solvent purchases and beginning inventory, returns, ending inventory, and waste shipped off-site.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	VOC	11.02 tons per year	Acetaldehyde	253.0 pounds per year	Ethanolamine	5,260.0 pounds per year	Formaldehyde	71.0 pounds per year	All other TAPs	Limited to SQER for each pollutant except those listed above. Combined TAPs (not including acetone or other non-VOC TAPs) must not exceed the VOC emission limit established above	1 - 3
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All other TAPs	Limited to SQER for each pollutant except those listed above. Combined TAPs (not including acetone or other non-VOC TAPs) must not exceed the VOC emission limit established above													

Req. No.	Emission Limits	Equipment/ Activity ID No.						
2.	<p>Emissions from the natural gas space heaters must not exceed the following:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>NO<sub>x</sub></td><td>0.34 tons per year</td></tr><tr><td>CO</td><td>0.29 tons per year</td></tr></table> <p>Emissions must be calculated consistent with the methodology and emission factors presented in Section 6 of the TSD for this ADP unless unit specific source test data is collected.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO <sub>x</sub>	0.34 tons per year	CO	0.29 tons per year	4
<u>Pollutant</u>	<u>Emission Limit</u>							
NO <sub>x</sub>	0.34 tons per year							
CO	0.29 tons per year							
3.	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 by a Certified Observer in accordance with SWCAA Method 9.	1 - 4						

### Operating Limits and Requirements

<b>Req. No.</b>	<b>Operating Limits and Requirements</b>	<b>Equipment/ Activity ID No.</b>
4.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
5.	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
6.	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.	1 - 4
7.	VOC content for inks shall remain below 1.0 lb/gallon of ink.	1 - 3
8.	VOC content for glues shall remain below 0.67 lb/gallon of glue.	1, 2
9.	All containers for VOC containing materials must be kept securely closed with a lid in place except when in active use. Open containers for storage, transfer or disposal of VOC containing materials are prohibited. In addition, all VOC containing materials used to clean and/or flush spray equipment or lines during clean up must be collected and stored in a closed container.	Facility-wide

**Monitoring and Recordkeeping Requirements**

<b>Req. No.</b>	<b>Monitoring and Recordkeeping Requirements</b>	<b>Equipment/ Activity ID No.</b>
10.	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.	1 - 4
11.	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
12.	Excess emissions and upset conditions must be recorded for each occurrence.	Facility-wide
13.	For VOC, HAP, or TAP-containing products used by the Permittee, purchase receipts and Safety Data Sheets/Technical Data Sheets must be maintained in a form readily available for inspection.	1 - 3
14.	Operational data must be monitored and recorded as follows: (a) Ink, solvent, and glue consumption      Recorded monthly (b) Natural gas consumption                      Recorded monthly (c) Type and quantity of hazardous waste disposal      Recorded for each occurrence (d) Equipment repair and maintenance activity      Recorded for each occurrence	1 - 4

**Emission Monitoring and Testing Requirements**

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

**Reporting Requirements**

<b>Req. No.</b>	<b>Reporting Requirements</b>	<b>Equipment/ Activity ID No.</b>
15.	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.	Facility-wide
16.	Excess emissions must be reported to SWCAA as follows: (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

<b>Req. No.</b>	<b>Reporting Requirements</b>	<b>Equipment/ Activity ID No.</b>
17.	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
18.	SWCAA must be notified at least seven (7) calendar days in advance of the use of any new material in excess of five (5) gallons which will result in emissions of toxic or hazardous air pollutants. The written notice must include the following: <ul style="list-style-type: none"> <li>(a) A description of the proposed change(s) in materials with an SDS 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> </ul> If the proposed emission rate of a new TAP exceeds the SQER and/or the VOC limit established in this ADP or otherwise circumvents an applicable requirement, including those established by this ADP, New Source Review must be required prior to making the proposed change.	Facility-wide
19.	An annual emissions inventory report must be submitted to SWCAA by March 15 <sup>th</sup> for emissions from the previous calendar year in accordance with SWCAA 400-105(1). Each report must contain, at a minimum, the following information: <ul style="list-style-type: none"> <li>(a) The annual sum of emissions of NO<sub>x</sub>, CO, VOC, SO<sub>2</sub>, PM, PM<sub>10</sub>, PM<sub>2.5</sub>, TAPs, and HAPs;</li> <li>(b) The quantity of each product consumed (gallons or pounds) containing VOCs, HAPS, or TAPs;</li> <li>(c) The quantity and type of hazardous waste disposed; and</li> <li>(d) The quantity of natural gas consumption.</li> </ul>	1 - 4
20.	Within ten (10) business days of initiating normal operation of the bag making facility, the Permittee must notify SWCAA that the facility is operating.	Facility-wide

### 3. General Provisions

<b>Req. No.</b>	<b>General Provisions</b>
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.

Req. No.	General Provisions
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.
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.



