



January 11, 2023

Mr. Richard Miller, President
Vancouver Sign Company, Inc.
3800 Fruit Valley Road, Suite B
Vancouver, WA 98660

RE: Final Air Discharge Permit for Existing Sign Fabrication Shop

Dear Mr. Miller:

A final determination to issue Air Discharge Permit (ADP) 23-3560 has been completed for ADP Application CL-3218 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-3218 was published in the permit section of SWCAA's website on December 14, 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 23-3560 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 23-3560 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 23-3560





SWCAA
Southwest Clean Air Agency

AIR DISCHARGE PERMIT
23-3560

Issued: January 11, 2023

Vancouver Sign Company Inc.
3800 Fruit Valley Road, Vancouver, WA 98660

SWCAA ID – 1002



REVIEWED BY:

Clinton 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	Spray Coating – Spray Booth (Rohner, ICD-PP-IPPEB-14-12-24-IPPEB)	Process enclosure, high transfer efficiency spray guns (minimum of 65%), high efficiency (at least 98%) particulate filters
2	Paint Mixing Room (Rohner, MX-9-8-12)	Process enclosure, elevated exhaust
3	Spray Booth Heater (Rohner, GH-VSU)	Ultralow 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.

ADP 23-3560 supersedes ADP 11-2991 in its entirety.

Emission Limits

Req. No.	Emission Limits	Equipment/Activity ID No.								
1.	<p>Emissions from the Paint Room and Spray Coating must not exceed any of the following:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="2">Pollutant</th> </tr> </thead> <tbody> <tr> <td>Volatile Organic Compounds</td> <td>2.17 tpy</td> </tr> <tr> <td>Particulate Matter, PM₁₀, total</td> <td>0.01 tpy</td> </tr> <tr> <td>Particulate Matter, PM_{2.5}, total</td> <td>0.01 tpy</td> </tr> </tbody> </table> <p>The long-term emission limits are 12-month rolling sums calculated consistent with Section 6 of the Technical Support Document (TSD) for this ADP.</p>	Pollutant		Volatile Organic Compounds	2.17 tpy	Particulate Matter, PM ₁₀ , total	0.01 tpy	Particulate Matter, PM _{2.5} , total	0.01 tpy	1-2
Pollutant										
Volatile Organic Compounds	2.17 tpy									
Particulate Matter, PM ₁₀ , total	0.01 tpy									
Particulate Matter, PM _{2.5} , total	0.01 tpy									
2.	<p>Emissions from the Spray Coating Booth Heaters must not exceed any of the following:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="2">Pollutant</th> </tr> </thead> <tbody> <tr> <td>Nitrogen Oxides</td> <td>0.56 tpy</td> </tr> <tr> <td>Carbon Monoxide</td> <td>0.47 tpy</td> </tr> </tbody> </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	0.56 tpy	Carbon Monoxide	0.47 tpy	3		
Pollutant										
Nitrogen Oxides	0.56 tpy									
Carbon Monoxide	0.47 tpy									

Req. No.	Emission Limits	Equipment/ Activity ID No.
3.	Emissions of toxic air pollutants (TAPs) must not exceed the respective Small Quantity Emission Rate listed in WAC 173-460, unless emissions are modeled below the respective Acceptable Source Impact Level listed in WAC 173-460. The long-term emission limits are 12-month rolling sums calculated consistent with Section 6 of the TSD for this ADP.	Facility-wide
4.	Visible emissions from all emission points at the facility 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.	Facility-wide

Operating Limits and Requirements

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
5.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
6.	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
7.	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
8.	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.	Facility-wide
9.	All exhaust points 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.	Facility-wide
10.	All spray coating must be performed inside the spray booth, unless otherwise specified by SWCAA.	1
11.	A differential pressure gauge must be installed and maintained to measure the pressure drop across the spray booth exhaust filter media.	1
12.	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

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
13.	All spray booth windows and doors must remain closed during spray coating operations.	1
14.	All spray coating must be performed with HVLP, airless, air-assisted airless, or spray guns providing an equivalent or superior transfer efficiency. Use of conventional spray guns is prohibited.	1
15.	The air cap pressure for each HVLP spray gun must not exceed 10 psig measured directly by an air cap pressure gauge or indirectly by setting the compressor to a pressure that the gun manufacturer has guaranteed will meet 10 psig at the cap.	1
16.	The spray booth must be operated with exhaust filters demonstrated to achieve a minimum of 98% capture efficiency of overspray. When multiple layers of filters are used, the combined capture efficiency must achieve a minimum of 98%.	1
17.	The spray booth heater must be fired on natural gas only.	1

Monitoring and Recordkeeping Requirements

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
18.	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
19.	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
20.	The Permittee shall maintain purchase receipts and safety data sheet or technical data sheet information for all coating and solvent 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

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
21.	Spray coating operations must be monitored and recorded as follows: <ul style="list-style-type: none"> (a) The amount of each coating material and solvent purchased must be recorded for each month. Coating materials include all chemicals used in the coating process, including but not limited to cleaners, primers, hardeners, activators, enhancers, thinners, and paints; (b) The quantity and type of hazardous waste disposed of must be recorded monthly; (c) The differential pressure across the filter system for the spray booth must be recorded for each week of operation. If the paint booth is not in use during a specific week, a record must be made to that effect; (d) Filter changes and maintenance activities for the paint booth must be recorded for each occurrence; (e) The total amount of natural gas consumed by the paint booth heaters must be recorded at least once for each calendar year; (f) Excess emissions must be recorded for each occurrence; and (g) 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. 	1-3

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.
22.	Excess emissions must be reported to SWCAA as follows: <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
23.	Deviations from permit conditions must be reported no later than 30 days after the end of the month during which the deviation is discovered.	Facility-wide

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
24.	<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 material and solvent consumed. Coating materials include all chemicals used in the coating process, including but not limited to cleaners, primers, hardeners, activators, enhancers, thinners, and paints. The Permittee may (is not required to) assume that consumables were used during the year purchased; (b) The quantity and type of hazardous waste disposed of; (c) The total amount of natural gas consumed by the paint booth heaters; and (d) Air emissions of criteria air pollutants, volatile organic compounds, TAPs, and hazardous air pollutants (HAPs). 	Facility-wide
25.	<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 VOCs, TAPs, or HAPs. The report must contain the following:</p> <ul style="list-style-type: none"> (a) A description of the type of product, 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 lbs) 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 ADP 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>

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.

**State Environmental Policy Act
DETERMINATION OF NON-SIGNIFICANCE 23-002**

Description of proposal:

Vancouver Sign Company Inc. submitted Air Discharge Permit (ADP) application CL-3218 to the Southwest Clean Air Agency in which the facility is seeking approval to operate an existing mixing room, paint booth, and paint booth heater.

Proponent:

Richard Miller, President

Location of proposal, including street address if any:

3800 Fruit Valley Road, Suite B
Vancouver, WA 98660

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 is not required under Revised Code of Washington (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 Determination of Non-Significance is issued under Washington Administrative Code (WAC) 197-11-340(2); the lead agency will not act on this proposal for fifteen (15) days from the date below. Comments must be submitted by _____.

Responsible official: Clinton Lamoreaux, 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 131

Signature: _____ **Date:** _____