

December 11, 2023

Mr. Marc Moody
Western Cascade Container, LLC
1808 Baker Way
Kelso, WA 98626

RE: Final Air Discharge Permit for Increase in Throughput and Emission Limits

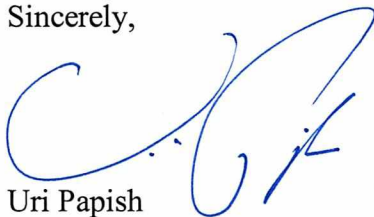
Dear Mr. Moody:

A final determination to issue Air Discharge Permit (ADP) 23-3618 has been completed for ADP application CO-1085 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 CO-1085 was published in the permit section of SWCAA's website on October 30, 2023. 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 23-3618 and the associated Technical Support Document (TSD) 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 23-3618 may be appealed directly to the Pollution Control Hearings Board (PCHB) 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 Vanessa McClelland at (360) 574-3058, extension 129.

Sincerely,



Uri Papish
Executive Director

UP: VM





SWCAA
Southwest Clean Air Agency

**AIR DISCHARGE PERMIT
23-3618**

Issued: December 11, 2023

**Western Cascade Container
2401 Talley Way
Kelso, WA 98626**

SWCAA ID – 2552



REVIEWED BY:

Clinton Lamoreaux, Chief Engineer

APPROVED BY:

Uri Papish, Executive Director

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1. Equipment/Activity Identification

ID No.	Equipment/Activity	Control Equipment/Measure
1	Spray Room	High Efficiency Filtration, High Transfer Efficiency Spray Equipment

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 23-3618 supersedes ADP 19-3366 in its entirety.

Emission Limits

Req. No.	Emission Limits	Equipment/Activity ID No.								
1.	<p>Combined emissions from the facility must not exceed any of the following:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Pollutant</th> <th>Emission Limit</th> </tr> </thead> <tbody> <tr> <td>Volatile Organic Compounds</td> <td>3.00 tpy</td> </tr> <tr> <td>Particulate Matter, PM₁₀, total</td> <td>0.05 tpy</td> </tr> <tr> <td>Toxic Air Pollutants</td> <td>SQER</td> </tr> </tbody> </table> <p>Annual 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.</p>	Pollutant	Emission Limit	Volatile Organic Compounds	3.00 tpy	Particulate Matter, PM ₁₀ , total	0.05 tpy	Toxic Air Pollutants	SQER	Facility-wide
Pollutant	Emission Limit									
Volatile Organic Compounds	3.00 tpy									
Particulate Matter, PM ₁₀ , total	0.05 tpy									
Toxic Air Pollutants	SQER									
2.	Visible emissions from approved equipment must not exceed zero percent opacity for more than 3 minutes in any one-hour period as determined by a Certified Observer certified in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).	1								

Operating Limits and Requirements

Req. No.	Operating Limits and Requirements	Equipment/Activity ID No.
3.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
4.	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

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
5.	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
6.	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
7.	All exhausts 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.	1
8.	Doors and windows of the spray room must be kept closed when actively engaged in production or cleanup.	1
9.	A differential pressure gauge must be installed and maintained on the spray room's filter to measure differential pressure across the exhaust filter media.	1
10.	The spray room must be fitted with particulate matter filters on the exhaust that are demonstrated to achieve 98 percent capture of paint overspray.	1
11.	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

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
12.	Except for 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
13.	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.	1
14.	Excess emissions and upset conditions must be recorded for each occurrence.	1

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
15.	<p>Operations must be monitored and recorded as follows:</p> <ul style="list-style-type: none"> (a) Differential pressure across the exhaust filter media of the spray room must be recorded weekly; (b) Spray coating and solvent consumption must be recorded for each calendar year; (c) The quantity and type of hazardous waste disposal must be recorded for each calendar year; (d) Safety Data Sheets (SDSs) and applicable coating composition data must be maintained on site; and (e) Maintenance activities, including spray room filter changes, must be recorded for each occurrence. 	1

Emission Monitoring and Testing Requirements

No emission monitoring or testing requirements were established for the approved equipment cited in this ADP.

Reporting Requirements

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
16.	Upset conditions must be reported to SWCAA as soon as possible after discovery by phone call or phone message, email, or fax. It is the Permittee's responsibility to verify that the upset conditions information was received.	Facility-wide
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 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
18.	Deviations from permit conditions must be reported as soon as possible but no later than 30 days after the end of the month during which the deviation is discovered.	Facility-wide
19.	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.
20.	<p>The following operations of the facility must be reported annually to SWCAA in written form by March 15th of the previous year:</p> <ul style="list-style-type: none"> (a) Amounts and types of hazardous waste disposed; (b) Annual throughput of evaporative products (paint, solvent, etc.); and (c) Summary of air emissions. 	1
21.	<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 (e.g., 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 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 use of the new product would cause any emission limit or SQER 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>	1

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>
C.	<p>The requirements of this ADP survive any transfer of ownership of the source or any portion thereof.</p>

Req. No.	General Provisions
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 ensure 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.
K.	For the purposes of establishing if a condition of this ADP has been violated or is being violated, nothing in this ADP precludes the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test procedures or methods had been performed.