

September 5, 2024

Nikita Nesterov  
Arch Wood Protection  
PO Box 340  
Kalama, WA 98625

Subject: Final Approval for Production of Pack B, Pack HPT, Homogenous Pack A, and Antiblu® M3

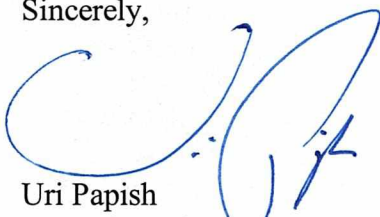
Dear Nikita Nesterov:

A final determination to issue Air Discharge Permit (ADP) 24-3661 has been completed for ADP application CO-1100 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-1100 was published in the permit section of SWCAA's website on May 31, 2024. 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 24-3661 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 24-3661 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 Clint Lamoreaux at (360) 574-3058, extension 131.

Sincerely,



Uri Papish  
Executive Director

UP:cl

Enclosure: Technical Support Document and Air Discharge Permit 24-3661





**AIR DISCHARGE PERMIT  
24-3661**

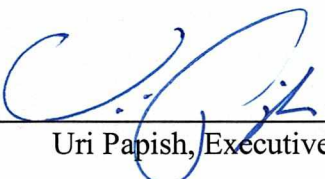
**Issued: September 5, 2024**

**ARCH WOOD PROTECTION  
532 Hendrickson Drive, Kalama, WA**

**SWCAA ID – 1264**



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	Production of Pack A/HPA, Pack B, Pack HPT, Antiblu® M3  Transfer and storage of MEA, Pack A/HPA, Pack HPT, Antiblu® M3, CCA Transloading	Scrubber system (venturi scrubber/inductor followed by packed bed)
2	ACZA Transloading	
3	Mixing Tank Production	None
4	Cooling Tower	Copper monitoring

**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.

Air Discharge Permit 21-3476 is superseded in its entirety by this Air Discharge Permit.

**Emission Limits**

<b>Req. No.</b>	<b>Emission Limits</b>	<b>Equipment/Activity ID No.</b>									
1.	Facility-wide VOC emissions must not exceed 1.60 tons per year. Emissions must be determined based on the methodology outlined in Section 6 of the Technical Support Document for this Permit.	Facility-wide									
2.	<p>Combined emissions from Pack A and Pack HPA production and associated operations must not exceed:</p> <table border="0"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>lb/batch</u></th> <th><u>Pounds per year</u></th> </tr> </thead> <tbody> <tr> <td>Ethanolamine</td> <td>0.0066</td> <td>949</td> </tr> <tr> <td>Volatile Organic Compounds (VOCs)</td> <td>0.0066</td> <td>949</td> </tr> </tbody> </table> <p>The lb/batch limit applies to activities taking place in tank/reactor R-2. The annual limit applies to emissions from the entire process, including loading, mixing, reacting, sparging, and storage. Annual emissions must be determined based on the methodology outlined in Section 6 of the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>lb/batch</u>	<u>Pounds per year</u>	Ethanolamine	0.0066	949	Volatile Organic Compounds (VOCs)	0.0066	949	1
<u>Pollutant</u>	<u>lb/batch</u>	<u>Pounds per year</u>									
Ethanolamine	0.0066	949									
Volatile Organic Compounds (VOCs)	0.0066	949									

<b>Req. No.</b>	<b>Emission Limits</b>	<b>Equipment/ Activity ID No.</b>
3.	<p>Ammonia emissions from ACZA transfer operations must not exceed:</p> <p>(a) 2.0 pounds per hour (1-hour average);            (b) 800 ppmvd (1-hour average); and            (c) 95 pounds per year.</p> <p>Annual emissions must be determined based on the methodology outlined in Section 6 of the Technical Support Document for this Permit. Hourly emissions must be calculated as the emission concentration measured at the scrubber outlet and the measured stack flow from the most recent source emissions test.</p>	2
4.	Visible emissions from all points of discharge must not exceed zero percent 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).	Facility-wide

### Operating Limits and Requirements

<b>Req. No.</b>	<b>Operating Limits and Requirements</b>	<b>Equipment/ Activity ID No.</b>
5.	The scrubber liquor in the packed bed scrubber must be replaced once every 12 batches of production.	1, 2
6.	The packed bed scrubber liquor flow rate must be no less than 35 gpm during production/operation.	1, 2
7.	The venturi scrubber liquor flow rate must be no less than 250 gpm during production/operation.	1, 2
8.	The scrubber system exhaust stack must be exhausted vertically above the building roof. Any device that obstructs or prevents vertical discharge is prohibited.	1, 2
9.	The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facility-wide
10.	Each pollution control device must be operated whenever the processing equipment served by that control device is in operation. Control devices must be operated and maintained in accordance with the manufacturer's specifications. Furthermore, control devices must be operated in a manner that minimizes emissions.	Facility-wide
11.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from the Permittee's operations.	Facility-wide
12.	Operations that cause or contribute to odors that unreasonably interfere with any other property owner's use and enjoyment of their property must use recognized good practice and procedures to reduce those odors to a reasonable minimum.	Facility-wide

<b>Req. No.</b>	<b>Operating Limits and Requirements</b>	<b>Equipment/ Activity ID No.</b>
13.	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.	Facility-wide

### Monitoring and Recordkeeping Requirements

<b>Req. No.</b>	<b>Monitoring and Recordkeeping Requirements</b>	<b>Equipment/ Activity ID No.</b>
14.	The scrubber system must be inspected at least once every 12 months when used for the production of Pack A or Homogenous Pack A. At a minimum, the inspection must include confirming the scrubbing components are in working order, including a visual inspection of the scrubber packing, demister, and spray pattern on the packed bed scrubber.	1, 2
15.	The cooling tower water must be tested for the presence of elevated levels of copper at least once per week. The test method must be capable of detecting copper at 20 ppm or less. A copper test strip or test paper may be used. If copper is detected at or above 20 ppm, the source of the copper must be investigated immediately to ensure the source is not a leak from Tank R-2.	4
16.	The following information must be collected, recorded at the intervals specified below, and readily available on-site for inspection: <ul style="list-style-type: none"> <li>(a) The total number of batches of Pack A and Homogenous Pack A produced must be logged for each calendar year;</li> <li>(b) The total amount of each product produced and transloaded at the facility must be logged for each calendar year;</li> <li>(c) The total amount of natural gas used at the facility must be recorded for each calendar year. This information may be gathered from billing data;</li> <li>(d) Maintenance activities that may affect emissions, including scrubber water changes, must be logged for each occurrence;</li> <li>(e) Excess emissions must be recorded for each occurrence; and</li> <li>(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.</li> </ul>	Facility-wide
17.	With the exception of data logged electronically, each record required by this Air Discharge Permit must include the date and the name of the person making the record entry.	Facility-wide
18.	All records required by this Air Discharge Permit must be available on site for a minimum period of no less than three years and must be available for inspection by SWCAA representatives.	Facility-wide

**Emission Monitoring and Testing Requirements**

<b>Req. No.</b>	<b>Emission Monitoring and Testing Requirements</b>	<b>Equipment/ Activity ID No.</b>
	None	

**Reporting Requirements**

<b>Req. No.</b>	<b>Reporting Requirements</b>	<b>Equipment/ Activity ID No.</b>
19.	<p>A written report must be submitted to SWCAA at least seven (7) calendar days prior to the use of any new material that contains VOCs, TAPs, or HAPs. The report must contain the following:</p> <ul style="list-style-type: none"> <li>(a) A description of the proposed change(s) in materials with a Safety Data Sheet 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 VOC, HAP and TAP compounds occurring as a result of the change; and</li> <li>(d) A summary of any requirement(s) that would apply as a result of the change(s).</li> </ul> <p>If the proposed emission rate of a TAP exceeds one or more SQERs and/or the TAP or VOC emission limits established by this permit or otherwise circumvents an applicable requirement including those established by this permit, New Source Review will be required prior to making the proposed change. The New Source Review must include an evaluation of BACT.</p>	Facility-wide
20.	<p>Excess emissions must be reported to SWCAA as follows:</p> <ul style="list-style-type: none"> <li>(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;</li> <li>(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(1); and</li> <li>(c) No later than 30 calendar days after the end of the month of discovery for all other excess emissions.</li> </ul>	Facility-wide
21.	Deviations from permit conditions must be reported no later than 30 calendar days after the end of the month during which the deviation is discovered.	Facility-wide
22.	All air quality related complaints received by the Permittee regarding activities controlled by the Permittee must be reported to SWCAA within three calendar days of receipt.	Facility-wide

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
23.	<p>The following emission-related information must be reported to SWCAA by March 15<sup>th</sup> for the previous calendar year:</p> <ul style="list-style-type: none"> <li>(a) The total number of batches of Pack A and Homogenous Pack A produced;</li> <li>(b) The total amount of each product produced and transloaded;</li> <li>(c) The total amount of natural gas used at the facility. This information may be gathered from billing data; and</li> <li>(d) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs).</li> </ul>	Facility-wide

### 3. General Provisions

Req. No.	General Provisions
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.
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.



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