

December 20, 2021

Hank Doane
10105 Mather Road
Clackamas, OR 97105

RE: Preliminary Air Discharge Permit for Metal Recycling Facility

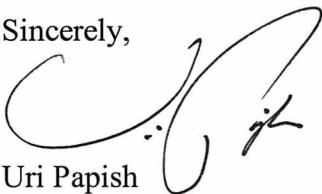
Dear Mr. Doane:

A preliminary determination to issue Air Discharge Permit (ADP) 21-3500 has been completed for ADP application CO-1044 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-1044 was published in the permit section of SWCAA's website on October 27, 2021. SWCAA received a request for a public comment period in response to the public notice. Therefore, a thirty (30) day public comment period will be provided for this permitting action.

Electronic copies of ADP 21-3500 and the associated Technical Support Document are available for public review on SWCAA's website at <https://www.swcleanair.gov/permits/publiccomments.asp>. Original copies are enclosed for your files. Also enclosed is a copy of the newspaper notice that SWCAA will publish one time in the legal notice section of *The Daily News*. The cost of this publication will be billed to PNW Metal Recycling as prescribed in SWCAA 400-109(4). If you are not satisfied with this public notice, please contact SWCAA within three (3) business days of receiving this letter. If you have any comments on this preliminary determination, please notify SWCAA within the specified comment period. If no comments are received, your final Air Discharge Permit will be issued at the conclusion of the comment period.

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 21-3500





**AIR DISCHARGE PERMIT
21-3500**

DRAFT Issued: December 20, 2021

**PNW METAL RECYCLING, LLC
100 Paper Way, Longview, WA**

SWCAA ID – 2734

REVIEWED BY: _____
Clinton Lamoreaux, Acting Chief Engineer

APPROVED BY: _____
Uri Papish, Executive Director

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1. Equipment/Activity Identification

ID No.	Equipment/Activity	Control Equipment/Measure
1	Propane or Acetylene Torch Cutting	Wet suppression, surface cleaning
2	Material Handling	Wet suppression
3	Roads and Yard Surface (fugitive emissions)	Sweeping, wet suppression

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 of PM₁₀ from torch cutting, material handling, and yard and road fugitive emissions must not exceed the following:</p> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Activity</th> <th>Emission Limit (tons per year)</th> </tr> </thead> <tbody> <tr> <td>Torch Cutting</td> <td>0.18</td> </tr> <tr> <td>Material Handling</td> <td>0.40</td> </tr> <tr> <td>Yard and Road Fugitive</td> <td>0.067</td> </tr> </tbody> </table> <p>Annual emissions from torch cutting must be calculated by multiplying the number of man-hours of torch cutting by the emission factors provided in Section 6 of the Technical Support Document (TSD) for this ADP unless new emission factors are developed through source emissions testing, or an alternative methodology is specified or approved by SWCAA.</p> <p>Annual emissions from material handling must be calculated by multiplying the amount of material handled by the emission factors identified in Section 6 of the TSD for this ADP and the average number of times the material is transferred unless new emission factors are developed and approved by SWCAA.</p> <p>Annual emissions from yard and road fugitives must be calculated using the vehicle miles traveled and the methodology and assumptions identified in Section 6 of the TSD for this ADP. The number of vehicle trips, used to estimate vehicle miles traveled, may be estimated from the average load weight and the total annual material receipt volume.</p>	Activity	Emission Limit (tons per year)	Torch Cutting	0.18	Material Handling	0.40	Yard and Road Fugitive	0.067	1 - 3
Activity	Emission Limit (tons per year)									
Torch Cutting	0.18									
Material Handling	0.40									
Yard and Road Fugitive	0.067									

Req. No.	Emission Limits	Equipment/ Activity ID No.
2.	Visual emissions from torch metal cutting must not exceed twenty percent opacity for more than three minutes in any one-hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).	1
3.	With the exception of torch cutting, visual emissions from equipment and activities at the facility must not exceed zero percent opacity for more than three minutes in any one hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).	2, 3

Operating Limits and Requirements

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
4.	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
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.	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
8.	The following must be removed from vehicles or appliances prior to baling or other destructive activities: <ul style="list-style-type: none"> (a) Fluids and refrigerants other than residual fluids remaining in tanks or systems; (b) Batteries; (c) Mercury-containing switches and sensors. All materials must be removed, handled, and disposed of in accordance with applicable state and federal regulations.	Facility-wide
9.	The Permittee must not accept crushed automobiles unless the supplier can demonstrate that mercury-containing switches and sensors have been removed. All mercury-containing switches must be removed from uncrushed automobiles received at the facility.	Facility-wide
10.	All torch cutting must be conducted at least 100 meters from the fenceline.	1
11.	Torch cutting of stainless steel or metal plated in nickel or chromium is prohibited.	1

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
12.	Torch cutting is only allowed for cutting metal items that cannot be otherwise processed with the hydraulic shears (e.g., ≥ 1 " thick steel).	1
13.	Smoke generation during torch cutting must be minimized by the use of best practices, including, but not limited to, the following: <ul style="list-style-type: none"> (a) Wiping excess dirt and oil from the area to be cut; (b) Removing any plastic coating from the material to be cut; (c) Removing any paint within at least 4 inches of a cutting line; (d) Placing the material to be cut, or choosing the cutting surface, such that the torch flame does not impinge on the ground; and (e) Utilizing wet suppression (fog or mist with Dust Boss DB-60 or equivalent) when cutting cable, cast iron and metal more than three inches thick. 	1
14.	The total number of man-hours of torch cutting must not exceed 7,300 per year.	1
15.	The facility may not receive more than 300,000 tons of material per calendar year.	2 - 3
16.	Wet suppression must be used as necessary in the process area and scrap piles to control fugitive dust during operations except as prohibited by other applicable rules (e.g. stormwater discharge rules). The permittee must use best practices to apply water in such a way that runoff is not generated (e.g., water application is balanced by evaporation). Best practices may include, but are not limited to: <ul style="list-style-type: none"> (a) Application of the water using sufficiently high pressure and appropriate nozzles to make a fine mist; (b) Even application of water to prevent runoff; and (c) Damming or blocking the stormwater collection point during dry periods to allow the application of water while preventing runoff. 	2 - 3
17.	To control fugitive dust from roads and process areas, roads and process areas must be swept daily when in use or maintained wet when in use.	2 - 3

Monitoring and Recordkeeping Requirements

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
18.	At least once per calendar month, the Permittee must conduct and document an inspection of the torch cutting activities to confirm that the activities comply with the requirements of this ADP. At a minimum the documentation must include the following: <ul style="list-style-type: none"> (a) A description of the material being cut; (b) Whether the area being cut was free of excess dirt and oil; (c) Whether the material originally had a plastic coating, and if so, whether all plastic coating was removed prior to cutting; (d) Whether the material was painted, and if so, if the paint was removed from the cutting line; (e) Whether the torch flame was prevented from impinging on the ground; and (f) Whether wet suppression in the form of fog or mist was in use. 	1

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 material received must be recorded for each calendar year; (b) The total amount of material baled must be recorded for each calendar year; (c) The total number of man-hours of torch cutting must be recorded for each calendar year; (d) The total number of mercury switches removed from vehicles must be recorded for each calendar year; (e) A log must be kept to document that all batteries, fluids, refrigerants, and mercury switches are removed from each vehicle received; (f) Upset conditions that cause 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. 	Facility-wide
20.	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
21.	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
22.	Excess emissions and upset conditions must be recorded for each occurrence.	Facility-wide

Emission Monitoring and Testing Requirements

None

Reporting Requirements

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
23.	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.
24.	Excess emissions must be reported to SWCAA as follows: <ul style="list-style-type: none"> (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; (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 (c) No later than 30 days after the end of the month of discovery for all other excess emissions. 	Facility-wide
25.	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
26.	The following emissions related records must be reported to SWCAA by March 15 th for the previous calendar year: <ul style="list-style-type: none"> (a) The total amount of material received; (b) The total amount of material baled; (c) The total number of man-hours of torch cutting; (d) A certification that all batteries, fluids, refrigerants, and mercury switches were removed from vehicles; and (e) Air emissions of criteria air pollutants, volatile organic compounds, hazardous air pollutants (HAPs), and toxic air pollutants (TAPs). 	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

Req. No.	General Provisions
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.

PUBLIC NOTICE

Notice to the public is hereby given that the Southwest Clean Air Agency (SWCAA) has made a preliminary determination to issue Air Discharge Permit number 21-3500 to PNW Metal Recycling for installation of a new metal recycling facility at 100 Paper Way, Longview, WA. The facility will generate fugitive dust from roadways and material handling and fume from the torch cutting of metal.

Copies of the preliminary Air Discharge Permit and associated Technical Support Document are available for review at 11815 NE 99th Street, Suite 1294, Vancouver, Washington, Monday through Friday from 7:00 a.m. to 5:30 p.m. Electronic copies are available for review in the permit section of SWCAA's internet website (<https://www.swcleanair.gov/permits/publiccomments.asp>). This material will be made available in other media, if necessary. All written or oral comments must be received by SWCAA within 30 days after the date of publication. Final action by SWCAA to approve, modify, or deny the proposal will be taken within 10 days after the close of the comment period. If there is a demonstrated significant public interest, a public meeting may be held at the close of the public comment period.

Questions and comments should be directed to Clint Lamoreaux at (360) 574-3058 ext. 131, clint@swcleanair.gov, or at the address listed above.