



June 25, 2025

Ms. Abby Marlow, Group Environmental Coordinator  
Skyline Steel, LLC  
9 International Way  
Longview, WA 98632

Subject: Preliminary Air Discharge Permit for Byard Dual Plasma Cutter

Dear Ms. Marlow:

A preliminary determination to issue Air Discharge Permit 25-3714 (ADP 25-3714) has been completed for ADP Application CO-1116 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-1116 was published in the permit section of SWCAA's internet website on May 2, 2025. SWCAA received a request for a public comment period in response to the public notice. Therefore, a 30-day public comment period will be provided prior to a final determination.

Electronic copies of ADP 25-3714 and the associated Technical Support Document are available for public review in the permit section of SWCAA's internet website (<http://www.swcleanair.gov/permits/publiccomments.asp>). Original copies are enclosed for your files. If you have any comments on this preliminary determination please notify SWCAA within the specified comment period. If no comments are received, a final Air Discharge Permit will be issued subsequent to the comment period.

If you have any comments, or desire additional information, please contact me or Wess Safford at (360) 574-3058, extension 126.

Sincerely,

Uri Papish  
Executive Director

UP:wls

Enclosure – Air Discharge Permit 25-3714 and Technical Support Document





**AIR DISCHARGE PERMIT  
25-3714**

**Preliminary Issued: June 25, 2025**

**Skyline Steel, LLC  
9 International Way, Longview, WA 98632**

**SWCAA ID - 2396**

REVIEWED BY:

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Clinton Lamoreaux, Chief Engineer

APPROVED BY:

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Uri Papish, Executive Director

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## 1. Equipment/Activity Identification

ID No.	Equipment/Activity	Control Measure/Equipment
1	Welding – SAW/FCAW	Building Enclosure
2	Rolled and Welded Plasma Table	Building Enclosure, High Efficiency Filtration
3	Byard Splice Plasma Cutter	Building Enclosure
4	Byard Dual Plasma Cutter	Building Enclosure
5	Handheld Plasma Torches	Building Enclosure

## 2. Approval Conditions

The following tables detail the specific requirements of this permit. In addition to the requirements listed below, equipment at this facility may be subject to other federal, state, and local regulations. The permit requirement number is identified in the left-hand column. The text of the permit requirement is contained in the middle column. The emission unit, equipment, or activity to which the permit requirement applies is listed in the right-hand column.

### Emission Limits

Req. No.	Emission Limits	Equipment/ Activity ID No.						
1.	<p>Combined emissions from welding operations must not exceed the following:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>PM<sub>10</sub>/PM<sub>2.5</sub></td><td>0.38 tpy</td></tr></table> <p>Annual emissions must be calculated from actual welding wire/rod consumption and applicable emission factors consistent with methodology from Section 6 of the Technical Support Document.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM <sub>10</sub> /PM <sub>2.5</sub>	0.38 tpy	1		
<u>Pollutant</u>	<u>Emission Limit</u>							
PM <sub>10</sub> /PM <sub>2.5</sub>	0.38 tpy							
2.	<p>Emissions from the Rolled and Welded Plasma Table 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>6.01 tpy</td></tr><tr><td>PM<sub>10</sub>/PM<sub>2.5</sub></td><td>0.97 tpy</td></tr></table> <p>Annual emissions must be calculated based on actual hours of operation and material throughput consistent with methodology from Section 6 of the Technical Support Document.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO <sub>x</sub>	6.01 tpy	PM <sub>10</sub> /PM <sub>2.5</sub>	0.97 tpy	2
<u>Pollutant</u>	<u>Emission Limit</u>							
NO <sub>x</sub>	6.01 tpy							
PM <sub>10</sub> /PM <sub>2.5</sub>	0.97 tpy							
3.	<p>Emissions from the Byard Splice Plasma Cutter 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>2.15 tpy</td></tr><tr><td>PM<sub>10</sub>/PM<sub>2.5</sub></td><td>0.06 tpy</td></tr></table> <p>Annual emissions must be calculated based on actual hours of operation and material throughput consistent with methodology from Section 6 of the Technical Support Document.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO <sub>x</sub>	2.15 tpy	PM <sub>10</sub> /PM <sub>2.5</sub>	0.06 tpy	3
<u>Pollutant</u>	<u>Emission Limit</u>							
NO <sub>x</sub>	2.15 tpy							
PM <sub>10</sub> /PM <sub>2.5</sub>	0.06 tpy							

Req. No.	Emission Limits	Equipment/ Activity ID No.						
4.	<p>Emissions from the Byard Dual Plasma Cutter 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>1.38 tpy</td></tr><tr><td>PM<sub>10</sub>/PM<sub>2.5</sub></td><td>0.06 tpy</td></tr></table> <p>Annual emissions must be calculated based on actual hours of operation and material throughput consistent with methodology from Section 6 of the Technical Support Document.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO <sub>x</sub>	1.38 tpy	PM <sub>10</sub> /PM <sub>2.5</sub>	0.06 tpy	4
<u>Pollutant</u>	<u>Emission Limit</u>							
NO <sub>x</sub>	1.38 tpy							
PM <sub>10</sub> /PM <sub>2.5</sub>	0.06 tpy							
5.	<p>Combined emissions from Handheld Plasma Torches must not exceed the following:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>PM<sub>10</sub>/PM<sub>2.5</sub></td><td>1.03 tpy</td></tr></table> <p>Annual emissions must be calculated based on actual hours of operation and material throughput consistent with methodology from Section 6 of the Technical Support Document.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM <sub>10</sub> /PM <sub>2.5</sub>	1.03 tpy	5		
<u>Pollutant</u>	<u>Emission Limit</u>							
PM <sub>10</sub> /PM <sub>2.5</sub>	1.03 tpy							
6.	<p>Visible emissions from process buildings and dust collectors at the facility must not exceed 0% for more than 3 minutes in any one-hour period as determined in accordance with SWCAA Method 9.</p>	1-5						

#### Operating Limits and Requirements

<b>Req. No.</b>	<b>Operating Limits and Requirements</b>	<b>Equipment/ Activity ID No.</b>
7.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
8.	The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facility-wide
9.	Each pollution control device/measure must be in use whenever the associated production equipment is in operation. Control devices must be operated and maintained in accordance with the manufacturer's specifications and operated in a manner that minimizes emissions.	1-5
10.	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.	1-5
11.	The Rolled and Welded Plasma Table must be vented to the associated dust collectors at all times during active plasma cutting. Dust collectors serving the Rolled and Welded Plasma Table must be maintained in good working order.	2

**Monitoring and Recordkeeping Requirements**

<b>Req. No.</b>	<b>Monitoring and Recordkeeping Requirements</b>	<b>Equipment/ Activity ID No.</b>
12.	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
13.	With the exception of data logged by a computerized data acquisition system, each record required by this Permit must include the date and the name of the person making the record entry. If a control device or process is not operating during a specific time period, a record must be made to that effect.	1-5
14.	All records required by this Permit must be kept for a minimum period of no less than three years and must be maintained in a form readily available for inspection by SWCAA representatives.	1-5
15.	Excess emissions and upset conditions must be recorded for each occurrence.	1-5
16.	<p>The following information must be collected, recorded at the intervals specified below, and made readily available for on-site inspection:</p> <p>(a) Quantity and type of welding wire/rod consumption      Recorded monthly</p> <p>(b) Plasma cutter operation (hours)      Recorded monthly for each plasma cutting operation</p> <p>(c) Maintenance activities that may affect emissions from approved equipment      Recorded for each occurrence</p> <p>(d) Calculated air emissions      Recorded annually</p>	1-5

**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>
17.	<p>All air quality related complaints received by the permittee must be reported to SWCAA within three days of receipt. Complaint reports must include the following information:</p> <p>(a) Date and time of the complaint;</p> <p>(b) Name of the complainant;</p> <p>(c) Nature of the complaint; and</p> <p>(d) Description of corrective action taken in response to complaint (if any).</p>	Facility-wide

<b>Req. No.</b>	<b>Reporting Requirements</b>	<b>Equipment/ Activity ID No.</b>
18.	Excess emissions must be reported to SWCAA as follows: (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; and (c) No later than 30 days after the end of the month of discovery for all other excess emissions.	1-5
19.	The following emission-related information must be reported to SWCAA by March 15 <sup>th</sup> for the previous calendar year: (a) Quantity and type of welding wire/rod consumption; (b) Hours of operation for each plasma cutting operation; and (c) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs).	1-5

### 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.
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.

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