TECHNICAL SUPPORT DOCUMENT

Air Discharge Permit ADP 25-3714
Air Discharge Permit Application CO-1116

Preliminary Issued: June 25, 2025

Skyline Steel, LLC

SWCAA ID - 2396

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Southwest Clean Air Agency

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ABBREVIATIONS

List of Acronyms

ADP	Air Discharge Permit
AP-42	Compilation of Emission Factors, AP-42, 5th Edition, Volume 1, Stationary Point and Area Sources – published by EPA
ASIL	Acceptable Source Impact Level
BACT	Best available control technology
CAM	Compliance Assurance Monitoring
CAS#	Chemical Abstracts Service registry number
CFR	Code of Federal Regulations
EPA	U.S. Environmental Protection Agency
EU	Emission Unit
NOV	Notice of Violation/
NSPS	New Source Performance Standard
PSD	Prevention of Significant Deterioration
RCW	Revised Code of Washington
SCC	Source Classification Code
SDS	Safety Data Sheet
SQER	Small Quantity Emission Rate listed in WAC 173-460
Standard	Standard conditions at a temperature of 68°F (20°C) and a pressure of 29.92 in Hg (760 mm Hg)
SWCAA	Southwest Clean Air Agency
T-BACT	Best Available Control Technology for toxic air pollutants
WAC	Washington Administrative Code

List of Units and Measures

µg/m³	Micrograms per cubic meter
acfm	Actual cubic foot per minute
dscfm	Dry Standard cubic foot per minute
gr/dscf	Grain per dry standard cubic foot
MMBtu	Million British thermal unit
ppm	Parts per million
ppmv	Parts per million by volume
ppmvd	Parts per million by volume, dry
ppmw	Parts per million by weight
scfm	Standard cubic foot per minute
tpy	Tons per year

List of Chemical Symbols, Formulas, and Pollutants

CH_4	Methane
CO	Carbon monoxide
CO_2	Carbon dioxide
CO_2e	Carbon dioxide equivalent
HAP	Hazardous air pollutant listed pursuant to Section 112 of the Federal Clean Air Act
NO_x	Nitrogen oxides
O_2	Oxygen
O_3	Ozone
PM	Particulate Matter with an aerodynamic diameter 100 µm or less
PM_{10}	PM with an aerodynamic diameter 10 µm or less
$PM_{2.5}$	PM with an aerodynamic diameter 2.5 µm or less
SO_2	Sulfur dioxide
SO_x	Sulfur oxides
TAP	Toxic air pollutant pursuant to Chapter 173-460 WAC
VOC	Volatile organic compound

Terms not otherwise defined have the meaning assigned to them in the referenced regulations or the dictionary definition, as appropriate.

1. FACILITY IDENTIFICATION

Applicant Name:	Skyline Steel, LLC
Applicant Address:	9 International Way, Longview, WA 98632
Facility Name:	Skyline Steel, LLC
Facility Address:	9 International Way, Longview, WA 98632
SWCAA Identification:	2396
Contact Person:	Abby Marlow, Group Environmental Coordinator
Primary Process:	Steel Pipe Manufacturing
SIC/NAICS Code:	3317 / Steel Pipe and Tubes 331210 / Iron and Steel Pipe and Tube Manufacturing
Facility Latitude and Longitude	46° 06' 41.24" N 122° 56' 27.17" W
Facility Classification:	Natural Minor

2. FACILITY DESCRIPTION

Skyline Steel, LLC (Skyline) operates a steel pipe manufacturing facility using steel from offsite steel mills. Fabrication operations generate emissions from welding, cutting, and machining.

3. CURRENT PERMITTING ACTION

This permitting action is in response to Air Discharge Permit application number CO-1116 (ADP Application CO-1116) dated April 30, 2025. Skyline submitted ADP Application CO-1116 requesting approval of the following:

- Installation of a new plasma cutter (Byard Dual Plasma Cutter).

The current permitting action provides approval for the new plasma cutter as proposed.

4. PROCESS DESCRIPTION

4.a. Pipe Manufacturing (*modified*). Steel plate, coil, and beams are delivered to and from Skyline's facility by truck and rail. All primary process units are located within a building enclosure. Air emissions are primarily generated by welding and plasma cutting operations. Minor emissions are generated by machining, parts washing, marking/stenciling, and propylene torch cutting operations (IEUs).

In the Rolled and Welded (R&W) Bay, steel plate is cut to desired lengths and beveled using a plasma table. After cutting, steel plate is rolled and welded to form fabricated steel rolls. Machine-based welding occurs at standard and girth welding stations within the R&W Bay. Emissions from the R&W plasma

table are controlled with process enclosure and two baghouses (downdraft, updraft). Emissions from welding are uncontrolled and fugitive in nature.

In the Byard Mill, steel coil is decoiled and processed using two plasma cutters (Plasma Splice Table, Dual Plasma Cutter). Cut steel is rolled, flattened, and welded. Emissions from the Byard Mill's plasma cutting and welding activities are uncontrolled and fugitive in nature.

In the Beam Bay, steel beam is cut to desired lengths using a HEM bandsaw. Handheld plasma torches are used to cut-to-length and/or place holes in beam product. Cutting shoes are hand welded onto the edges of the beams to strengthen the steel. Emissions from the Beam Bay's sawing, cutting, and welding activities are uncontrolled and fugitive in nature.

In the Fabrication Bay, steel h-pile, sheet pile and pipe piling is cut to desired lengths using handheld plasma and propylene torches. These torches are also used to cut holes in steel product. Cutting shoes are hand welded or welded using submerged arc techniques onto the edges of the beams and pipe piling to strengthen the steel. Emissions from these activities are uncontrolled and fugitive in nature.

ADP Application CO-1116. Existing manufacturing operations at the Longview facility have been in operation since before 2011. Skyline is installing a new plasma cutter in the Byard Mill (Dual Plasma Cutter). Skyline is not proposing any changes to existing equipment or operations.

5. EQUIPMENT/ACTIVITY IDENTIFICATION

5.a. Welding – SAW/FCAW (*existing*). This emission unit consists of multiple SAW and FCAW welding stations/machines used to manufacture steel pipe/pilings and attach cutting shoes. Welding operations take place inside a building envelope in multiple work areas. Emissions from welding operations are fugitive in nature.

Location: 46°06'41.24" N 122°56'27.17" W

5.b. Rolled and Welded Plasma Table (*existing*). This emission unit is an automated plasma cutting system used to process steel plate in the Rolled and Welded Bay. Emissions generated by plasma cutting are captured and vented to one of two dust collectors.

Unit Make/Model: ESAB / Avenger 2 4M (s/n 97-VIS2-7286)
Plasma Torch Make/Model: Hypertherm / HPR 400-XP (s/n HPR400-000576)

Downdraft Dust Collector.
Make/Model: Donaldson Torit / DFO3-18 (s/n 3487484-1)
Rated Airflow: 6,000 cfm
Cleaning Method: Pulse Jet
Exhaust Stack: 22.5" x 13", vertical at 17' 4" above ground level
Location: 46°06'43.52"N 122°56'25.00"W

Updraft Dust Collector.

Make/Model:	Donaldson Torit / DFO3-3 (s/n 16671237-L1-1)
Rated Airflow:	2,200 cfm (est)
Cleaning Method:	Pulse Jet
Exhaust Stack:	Exhausts inside building
Location:	46°06'42.80"N 122°56'25.58"W

5.c. Byard Splice Plasma Cutter (*existing*). This emission unit is an automated cutting system used to process steel coil and plate in the Byard Mill. Emissions generated from plasma cutting are emitted fugitively inside a building envelope.

Unit Make/Model:	Byard
Plasma Torch Make/Model:	Hypertherm / MaxPro 200 (s/n MP200-011304)
Location:	46°06'42.59"N 122°56'26.84"W

5.d. Byard Dual Plasma Cutter (*new*). This emission unit is an automated cutting system used to cut steel coil and plate in the Byard Mill. Emissions generated from plasma cutting are emitted fugitively inside the building envelope.

Unit Make/Model:	Byard
Plasma Torch Make/Model:	(2) Hypertherm / HPR 400XD (s/n HPR400-010603, HPR400-010604)
Location:	46°06'41.58"N 122°56'27.10"W

ADP Application CO-1116. Skyline is installing a new plasma cutting system in the Byard Mill. The unit will be located inside the building envelope. Emissions will discharge fugitively within the building. No changes to existing Byard Mill operations are proposed.

5.e. Handheld Plasma Torches (*existing*). This emission unit consists of handheld plasma cutting torches used to cut steel in the Byard Bay, the Fabrication Bay, and a small exterior yard area adjacent to the Fabrication Bay. These torches are also used to cut to length and make holes in steel product. Operations in the exterior yard are limited to steel pieces that cannot be safely handled inside the Fabrication Bay. Emissions from plasma cutting are emitted fugitively.

Plasma Torch Make/Model:	Hypertherm / MaxPro 200 (s/n MP200-003851) Hypertherm / Powermax 125 (s/n 125-018408)
Location:	46°06'42.70"N 122°56'29.01"W

5.f. Insignificant Emission Units. The following facility equipment/processes have been determined to have insignificant emissions, and are not registered as emission units:

HEM Bandsaw. One bandsaw used to cut steel beam to desired lengths in the Beam Bay.

Parts Washer. One parts washer is used to clean miscellaneous steel pieces at the facility.

Propylene Hand Torches. Multiple handheld propylene torches are used to cut and trim steel pieces at various locations at the facility.

Ink/Paint Stencils. Various paints and inks to mark/stencil steel pieces with numbers, letters, and other necessary product information.

5.g. Equipment/Activity Summary.

ID No.	Equipment/Activity	Control Equipment/Measure
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

6. EMISSIONS DETERMINATION

Emissions to the ambient atmosphere from steel pipe manufacturing operations, as proposed in ADP Application CO-1116, consist of nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), particulate matter (PM), sulfur dioxide (SO_2), toxic air pollutants (TAPs), and hazardous air pollutants (HAPs).

Unless otherwise specified by SWCAA, actual emissions must be determined using the specified input parameter listed for each emission unit and the following hierarchy of methodologies:

(a) Continuous emissions monitoring system (CEMS) data;
(b) Source emissions test data (EPA reference method). When source emissions test data conflicts with CEMS data for the time period of a source test, source test data must be used;
(c) Source emissions test data (other test method); and
(d) Emission factors or methodology provided in this TSD.

6.a. Welding (*existing*). Potential emissions from welding are calculated based on maximum weld wire/rod usage and emission factors from EPA AP-42, Section 12.19 (1/95). All welding takes place inside a building envelope. No active emission controls are in use. Annual emissions will be calculated from actual weld wire/rod consumption using the same methodology.

Welding Emissions

Type	Throughput (lb/yr)	Emission Factors (lb/1,000 lb) Cr	Cr(VI)	Co	Mn	Ni	Pb	PM_{10}	$PM_{2.5}$
SAW EM12K	410,844	0.000	0.000		0.000	0	0	0.05	0.05
FCAW	36,799	0.000	0.000		0.2865	0.00287	0	20.0	20.0

Type	Emissions (lb/yr) Cr	Cr(VI)	Co	Mn	Ni	Pb	PM_{10}	$PM_{2.5}$
SAW EM12K	0.00	0.00	0.00	0.00	0.00	0.00	20.5	20.5
FCAW	0.00	0.00	0.00	10.54	0.11	0.00	736.0	736.0
Controlled Emissions =	0.00	0.00	0.00	10.54	0.11	0.00	756.5	756.5
Filter Efficiency =	0.00%		Capture Efficiency =		0%			
Total Emissions =	0.00	0.00	0.00	10.54	0.11	0.00	756.5	756.5

6.b. Rolled and Welded Plasma Table (*existing*). Potential emissions from plasma cutting operations are calculated based on 8,760 hr/yr of operation, an overall emission control efficiency of 85%, and emission factors from "*Emissions of Fume, Nitrogen Oxides and Noise in Plasma Cutting of Stainless and Mild Steel*" Bromeen B. et al March 1994. All PM is assumed to be $PM_{2.5}$. HAP/TAP emissions are calculated as proportional fractions of total PM emissions based on bulk material content per SDS data. The cutting/operation ratio represents the portion of each operating hour spent cutting versus handling material. Annual emissions will be calculated from actual operation using the same methodology.

Hours of operation = 8,760

Max Cutting/Operation Ratio = 55%

Pollutant	Maximum (lb/hr)	Emissions Average Avg lb/hr	Annual (tpy)
NO_X	3.50	2.50	6.01
$PM/PM_{10}/PM_{2.5}$	0.46	0.40	0.97
			(lb/yr)
Co (0.02% PM)	9.18E-05		0.39
Cr II/III (0.02% PM)	9.18E-05		0.39
Mn (0.3% PM)	1.38E-03		5.84
Ni (0.05% PM)	2.30E-04		0.97

6.c. Byard Plasma Splice Cutter (*existing*). Potential emissions from plasma cutting operations are calculated based on 8,760 hr/yr of operation and emission factors from "*Emissions of Fume, Nitrogen Oxides and Noise in Plasma Cutting of Stainless and Mild Steel*" Bromeen B. et al March 1994. All PM is assumed to be $PM_{2.5}$. HAP/TAP emissions are calculated as proportional fractions of total PM emissions based on bulk material content per SDS data. The cutting/operation ratio represents the portion of each operating hour spent cutting versus handling material. Annual emissions will be calculated from actual operation using the same methodology.

Hours of operation =	8,760		
Max Cutting/Operation Ratio =	28%		
		Emissions	
	Maximum	Average	Annual
Pollutant	(lb/hr)	Avg lb/hr	(tpy)
NO_X	2.21	1.75	2.15
$PM/PM_{10}/PM_{2.5}$	0.071	0.045	0.055
			(lb/yr)
Co (0.02% PM)	1.42E-05		0.022
Cr II/III (0.02% PM)	1.42E-05		0.022
Mn (0.3% PM)	2.13E-04		0.33
Ni (0.05% PM)	3.55E-05		0.055

6.d. Byard Dual Plasma Cutter (*new*). Potential emissions from plasma cutting operations are calculated based on 8,760 hr/yr of operation and emission factors from "*Emissions of Fume, Nitrogen Oxides and Noise in Plasma Cutting of Stainless and Mild Steel*" Bromeen B. et al March 1994. All PM is assumed to be $PM_{2.5}$. HAP/TAP emissions are calculated as proportional fractions of total PM emissions based on bulk material content per SDS data. The cutting/operation ratio represents the portion of each operating hour spent cutting versus handling material. Annual emissions will be calculated from actual operation using the same methodology.

Hours of operation =	8,760		
Max Cutting/Operation Ratio =	16.7%		
		Emissions	
	Maximum	Average	Annual
Pollutant	(lb/hr)	Avg lb/hr	(tpy)
NO_X	2.21	1.89	1.38
$PM/PM_{10}/PM_{2.5}$	0.107	0.078	0.057
			(lb/yr)
Co (0.02% PM)	2.14E-05		0.023
Cr II/III (0.02% PM)	2.14E-05		0.023
Mn (0.3% PM)	3.21E-04		0.34
Ni (0.05% PM)	5.35E-05		0.057

ADP Application CO-1116. Skyline proposes to install a second plasma cutter in the Byard Mill area. The new unit is not equipped with active emission controls and vents fugitively to the building envelope.

6.e. Handheld Plasma Torches (*existing*). Potential emissions from handheld plasma torch use are calculated based on 8,760 hr/yr of operation and emission factors from "*Emissions of Fume, Nitrogen Oxides and Noise in Plasma Cutting of Stainless and Mild Steel*" Bromeen B. et al March 1994. All PM is assumed to be $PM_{2.5}$. HAP/TAP emissions are calculated as proportional fractions of total PM emissions based on bulk material content per SDS data. The cutting/operation ratio represents the portion of each operating hour spent cutting versus handling material. Annual emissions will be calculated from actual operation using the same methodology.

Hours of operation =	8,760	
Max Cutting/Operation Ratio =	100%	
	Emissions	
Pollutant	(lb/hr)	(tpy)
$PM/PM_{10}/PM_{2.5}$	0.24	1.03
		(lb/yr)
Co (0.02% PM)	4.72E-05	0.41
Cr II/III (0.02% PM)	4.72E-05	0.41
Mn (0.3% PM)	7.08E-04	6.20
Ni (0.05% PM)	1.18E-04	1.03

6.f. Emissions Summary/Facility-wide Potential to Emit. Facility-wide potential to emit as calculated in the sections above is summarized below.

Pollutant	Potential Emissions (tpy)	Project Increase (tpy)
NO_X	9.54	1.38
CO	0.00	0.00
VOC	0.00	0.00
SO_2	0.00	0.00
Lead	0.00	0.00
PM	2.50	0.057
PM_{10}	2.50	0.057
$PM_{2.5}$	2.50	0.057
TAP	0.014	0.00022
HAP	0.014	0.00022
CO_2e	0.00	0.00

Pollutant	CAS Number	Category	Facility-wide Emissions	Project Increase	WAC 173-460 SQER
			lb/yr	lb/yr	lb/yr
Nickel	7440-02-0	HAP/TAP	2.22	0.057	0.62
			lb/24-hr	lb/24-hr	lb/24-hr
Chromium (II/III)	7440-47-3	HAP/TAP	0.0023	5.1E-4	0.37
Cobalt	7440-48-4	HAP/TAP	0.0023	5.1E-4	0.0074
Manganese	7439-96-5	HAP/TAP	0.064	0.0077	0.022

7. REGULATIONS AND EMISSION STANDARDS

Regulations that have been used to evaluate the acceptability of the proposed facility and establish emission limits and control requirements include, but are not limited to, the regulations, codes, or requirements listed below.

7.a. Title 40 Code of Federal Regulations Part 63 (40 CFR 63) Subpart XXXXXX "National Emissions Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories" establishes standards and work practices for dry abrasive blasting, machining, dry grinding and polishing, spray painting, and welding operations at area sources primarily engaged in one of nine selected metal fabrication and finishing source categories. This facility is an area source and is not in one of the source categories subject to this regulation. Therefore, this regulation is not applicable.

7.b. Revised Code of Washington (RCW) 70A.15.2040 empowers any activated air pollution control authority to prepare and develop a comprehensive plan or plans for the prevention, abatement and control of air pollution within its jurisdiction. An air pollution control authority may issue such orders as may be necessary to effectuate the purposes of the Washington Clean Air Act and enforce the same by all appropriate administrative and judicial proceedings subject to the rights of appeal as provided in Chapter 62, Laws of 1970 ex. sess.

7.c. RCW 70A.15.2210 provides for the inclusion of conditions of operation as are reasonably necessary to assure the maintenance of compliance with the applicable ordinances, resolutions, rules and regulations when issuing an Air Discharge Permit for installation and establishment of an air contaminant source.

7.d. Washington Administrative Code (WAC) 173-460 "Controls for New Sources of Toxic Air Pollutants" requires Best Available Control Technology for toxic air pollutants (T-BACT), identification and quantification of emissions of toxic air pollutants and demonstration of protection of human health and safety.

7.e. WAC 173-476 "Ambient Air Quality Standards" establishes ambient air quality standards for PM_{10}, $PM_{2.5}$, lead, sulfur dioxide, nitrogen dioxide, ozone, and carbon monoxide in the ambient air, which shall not be exceeded.

7.f. SWCAA 400-040 "General Standards for Maximum Emissions" requires all new and existing sources and emission units to meet certain performance standards with respect to Reasonably Available Control

Technology (RACT), visible emissions, fallout, fugitive emissions, odors, emissions detrimental to persons or property, sulfur dioxide, concealment and masking, and fugitive dust.

7.g. SWCAA 400-050 "Emission Standards for Combustion and Incineration Units" requires that all provisions of SWCAA 400-040 be met and that no person shall cause or permit the emission of particulate matter from any combustion or incineration unit in excess of 0.23 grams per dry cubic meter (0.1 grains per dry standard cubic foot) of exhaust gas at standard conditions.

7.h. SWCAA 400-060 "Emission Standards for General Process Units" prohibits particulate matter emissions from all new and existing process units in excess of 0.1 grains per dry standard cubic foot of exhaust gas.

7.i. SWCAA 400-109 "Air Discharge Permit Applications" requires that an Air Discharge Permit application be submitted for all new installations, modifications, changes, or alterations to process and emission control equipment consistent with the definition of "new source". Sources wishing to modify existing permit terms may submit an Air Discharge Permit application to request such changes. An Air Discharge Permit must be issued, or written confirmation of exempt status must be received, before beginning any actual construction, or implementing any other modification, change, or alteration of existing equipment, processes, or permits.

7.j. SWCAA 400-110 "New Source Review" requires that SWCAA issue an Air Discharge Permit in response to an Air Discharge Permit application prior to establishment of the new source, emission unit, or modification.

7.k. SWCAA 400-113 "Requirements for New Sources in Attainment or Nonclassifiable Areas" requires that no approval to construct or alter an air contaminant source shall be granted unless it is evidenced that:

(1) The equipment or technology is designed and will be installed to operate without causing a violation of the applicable emission standards;
(2) Best Available Control Technology will be employed for all air contaminants to be emitted by the proposed equipment;
(3) The proposed equipment will not cause any ambient air quality standard to be exceeded; and
(4) If the proposed equipment or facility will emit any toxic air pollutant regulated under WAC 173-460, the proposed equipment and control measures will meet all the requirements of that Chapter.

8. RACT/BACT/BART/LAER/PSD/CAM DETERMINATIONS

The proposed equipment and control systems incorporate Best Available Control Technology (BACT) for the types and amounts of air contaminants emitted by the processes as described below:

New BACT Determinations

8.a. BACT Determination – Plasma Cutting. The proposed use of building enclosure has been determined to meet the requirements of BACT for PM emissions generated by plasma cutting operations. SWCAA has determined that add-on emission controls for PM and NO_X are not cost effective based on the quantity and nature of proposed emissions.

Other Determinations

8.b. Prevention of Significant Deterioration (PSD) Applicability Determination. The potential to emit of this facility is less than applicable PSD applicability thresholds. Likewise, this permitting action will not result in a potential increase in emissions equal to or greater than the PSD thresholds. Therefore, PSD review is not applicable to this action.

8.c. Compliance Assurance Monitoring (CAM) Applicability Determination. CAM is not applicable to any emission unit at this facility because it is not a major source and is not required to obtain a Part 70 permit.

9. AMBIENT IMPACT ANALYSIS

9.a. Criteria Air Pollutant Review. Criteria pollutant emissions from approved operations are not expected to cause an adverse impact on ambient air quality.

9.b. TAP Small Quantity Review. The incremental increases in TAP emissions associated with this permitting action are quantified in Section 6 of this Technical Support Document. All incremental increases in individual TAP emissions are less than the applicable small quantity emission rate (SQER) identified in WAC 173-460.

Conclusions

9.c. Installation of a plasma cutter, as proposed in ADP Application CO-1116, will not cause the ambient air quality requirements of Title 40 Code of Federal Regulations (CFR) Part 50 "National Primary and Secondary Ambient Air Quality Standards" to be violated.

9.d. Installation of a plasma cutter, as proposed in ADP Application CO-1116, will not cause the requirements of WAC 173-460 "Controls for New Sources of Toxic Air Pollutants" or WAC 173-476 "Ambient Air Quality Standards" to be violated.

9.e. Installation of a plasma cutter, as proposed in ADP Application CO-1116, will not cause a violation of emission standards for sources as established under SWCAA General Regulations Sections 400-040 "General Standards for Maximum Emissions," 400-050 "Emission Standards for Combustion and Incineration Units," and 400-060 "Emission Standards for General Process Units."

10. DISCUSSION OF APPROVAL CONDITIONS

SWCAA has made a determination to issue ADP 25-3714 in response to ADP Application CO-1116. ADP 25-3714 contains approval requirements deemed necessary to assure compliance with applicable regulations and emission standards as discussed below.

10.a. General Basis. Permit requirements for equipment affected by this permitting action incorporate the operating schemes proposed by the applicant in ADP Application CO-1116. Permit requirements established by this action are intended to implement BACT, minimize emissions, and assure compliance with applicable requirements on a continuous basis. Emission limits for approved equipment are based on the maximum potential emissions calculated in Section 6 of this Technical Support Document.

10.b. Monitoring and Recordkeeping Requirements. ADP 25-3714 establishes monitoring and recordkeeping requirements sufficient to document compliance with applicable emission limits, ensure proper operation of approved equipment and provide for compliance with generally applicable requirements. Specific monitoring requirements are established for hours of operation and material throughput.

10.c. Reporting Requirements. ADP 25-3714 establishes general reporting requirements for annual air emissions, upset conditions and excess emissions. Specific reporting requirements are established for hours of operation and material throughput. Reports are to be submitted on an annual basis.

10.d. Welding Operations. Permit requirements for welding operations are based on the maximum welding wire/rod consumption specified by the applicant. Current welding operations employ SAW and FCAW welding equipment. Annual emissions will be calculated from wire/rod specific emission factors and actual wire/rod consumption using emission factors from AP-42, Section 12.19 and other sources.

10.e. Plasma Cutting Units. Emissions from plasma cutting operations are minimized with process enclosure. Visible emissions from the approved units are limited to 0% opacity.

11. START-UP AND SHUTDOWN/ALTERNATIVE OPERATING SCENARIOS/POLLUTION PREVENTION

11.a. Start-up and Shutdown Provisions. Pursuant to SWCAA 400-081 "Start-up and Shutdown", technology based emission standards and control technology determinations shall take into consideration the physical and operational ability of a source to comply with the applicable standards during start-up or shutdown. Where it is determined that a source is not capable of achieving continuous compliance with an emission standard during start-up or shutdown, SWCAA shall include appropriate emission limitations, operating parameters, or other criteria to regulate performance of the source during start-up or shutdown.

The applicant did not identify any start-up and shutdown periods during which affected equipment is not capable of achieving continuous compliance with applicable technology determinations or approval conditions. To SWCAA's knowledge, this facility can comply with all applicable standards during startup and shutdown.

11.b. Alternate Operating Scenarios. SWCAA conducted a review of alternate operating scenarios applicable to equipment affected by this permitting action. The permittee did not propose or identify any applicable alternate operating scenarios. Therefore, none were included in the permit requirements.

11.c. Pollution Prevention Measures. SWCAA conducted a review of possible pollution prevention measures for the facility. No pollution prevention measures were identified by either the permittee or SWCAA separate from those measures required under BACT considerations. Therefore, none were included in the permit requirements.

12. EMISSION MONITORING AND TESTING

There are no formal emission monitoring or testing requirements for this facility.

13. FACILITY HISTORY

13.a. Previous Permitting Actions. SWCAA has not previously issued any Permits for this facility.

13.b. Compliance History. A search of source records on file at SWCAA did not identify any outstanding compliance issues at this facility.

14. PUBLIC INVOLVEMENT OPPORTUNITY

14.a. Public Notice for ADP Application CO-1116. Public notice for ADP Application CO-1116 was published on the SWCAA internet website for a minimum of (15) days beginning on May 2, 2025.

14.b. Public/Applicant Comment for ADP Application CO-1116. A (30) day public comment period will be provided for this permitting action pursuant to SWCAA 400-171(3). SWCAA will provide a response to all comments received during the comment period.

14.c. State Environmental Policy Act. A complete SEPA checklist was submitted by Skyline in conjunction with ADP Application CO-1116. After reviewing the checklist, SWCAA has made a Determination of Nonsignificance (DNS 25-028) concurrent with issuance of ADP 25-3714.