



August 14, 2024

Mr. Cliff Lucas, Director of Machinery and Tooling  
National Products, Inc.  
8410 Dallas Ave S  
Seattle, WA 98108

Subject: Final Air Discharge Permit for Die-casting and Powder Coating Facility

Dear Mr. Lucas:

A final determination to issue Air Discharge Permit 24-3655 (ADP 24-3655) has been completed for Air Discharge Permit (ADP) Application CO-1097 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-1097 was published in the permit section of SWCAA's internet website on May 10, 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 24-3655 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/adpfinal.asp>). Original copies are enclosed for your files.

This Air Discharge Permit may be appealed directly to the Pollution Control Hearings Board (PCHB) within 30 days of receipt as provided in RCW 43.21B.

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 24-3655 and Technical Support Document





**SWCAA**  
Southwest Clean Air Agency


**AIR DISCHARGE PERMIT  
24-3655**

**Issued: August 14, 2024**

National Products  
2209 Talley Way, Kelso, Washington 98626

SWCAA ID - 2804

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 Measure/Equipment</b>
1	Melting Furnaces / Die-casting (3) Rayteq DC-635 (2) Rayteq DC-500	Process Enclosure, Material Limitation
2	Shot Machines	Process Enclosure, High Efficiency Filtration
3	Powder Coat Wash System (Midwest Finishing – 1.0 MMBtu/hr)	Low Sulfur Fuel (Natural Gas)
4	Powder Coat Dry Off Oven (Midwest Finishing – 2.0 MMBtu/hr)	Low Sulfur Fuel (Natural Gas)
5	Powder Coat Cure Oven (Midwest Finishing – 2.0 MMBtu/hr)	Low Sulfur Fuel (Natural Gas)
6	Burn Off Ovens (2) Guspro BB607272	Low Sulfur Fuel (Natural Gas), Oxidizer

**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**

<b>Req. No.</b>	<b>Emission Limits</b>	<b>Equipment/Activity ID No.</b>						
1.	Emissions of toxic air pollutants other than nickel must not individually exceed the Small Quantity Emission Rate identified for that pollutant in WAC 173-460. Emissions must be calculated using the methodology described in the Technical Support Document for this Air Discharge Permit.	Facility-wide						
2.	Emissions from metal melting and die-casting operations must not exceed: <table border="0" style="margin-left: 40px;"> <tr> <td><u>Pollutant</u></td> <td><u>Emission Limit</u></td> </tr> <tr> <td>PM<sub>10</sub></td> <td>0.14 tpy</td> </tr> <tr> <td>Nickel</td> <td>1.06 lb/yr</td> </tr> </table> <p>Annual emissions must be calculated from actual material throughput consistent with the methodology described in the Technical Support Document for this Air Discharge Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM <sub>10</sub>	0.14 tpy	Nickel	1.06 lb/yr	1
<u>Pollutant</u>	<u>Emission Limit</u>							
PM <sub>10</sub>	0.14 tpy							
Nickel	1.06 lb/yr							

<b>Req. No.</b>	<b>Emission Limits</b>	<b>Equipment/ Activity ID No.</b>												
3.	<p>Emissions from the Shot Machine filter system must not exceed the following:</p> <table data-bbox="272 264 993 373"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>PM</td> <td>0.005 gr/dscf (1-hour average)</td> </tr> <tr> <td>PM<sub>10</sub></td> <td>0.36 tpy</td> </tr> </tbody> </table> <p>Annual emissions must be calculated based on actual hours of operation consistent with the methodology in Section 6 of the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM	0.005 gr/dscf (1-hour average)	PM <sub>10</sub>	0.36 tpy	2						
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PM	0.005 gr/dscf (1-hour average)													
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4.	<p>Emissions from Powder Coat Wash System operation must not exceed:</p> <table data-bbox="272 575 760 756"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>NO<sub>x</sub></td> <td>0.51 tpy</td> </tr> <tr> <td>CO</td> <td>0.36 tpy</td> </tr> <tr> <td>VOC</td> <td>0.024 tpy</td> </tr> <tr> <td>PM<sub>10</sub></td> <td>0.033 tpy</td> </tr> </tbody> </table> <p>Annual emissions must be calculated from actual fuel consumption consistent with the methodology described in the Technical Support Document for this Air Discharge Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO <sub>x</sub>	0.51 tpy	CO	0.36 tpy	VOC	0.024 tpy	PM <sub>10</sub>	0.033 tpy	3		
<u>Pollutant</u>	<u>Emission Limit</u>													
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5.	<p>Emissions from Powder Coat Dry Off Oven operation must not exceed:</p> <table data-bbox="272 957 760 1138"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>NO<sub>x</sub></td> <td>1.02 tpy</td> </tr> <tr> <td>CO</td> <td>0.72 tpy</td> </tr> <tr> <td>VOC</td> <td>0.047 tpy</td> </tr> <tr> <td>PM<sub>10</sub></td> <td>0.065 tpy</td> </tr> </tbody> </table> <p>Annual emissions must be calculated from actual fuel consumption consistent with the methodology described in the Technical Support Document for this Air Discharge Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO <sub>x</sub>	1.02 tpy	CO	0.72 tpy	VOC	0.047 tpy	PM <sub>10</sub>	0.065 tpy	4		
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PM <sub>10</sub>	0.065 tpy													
6.	<p>Emissions from Powder Coat Cure Oven operation must not exceed:</p> <table data-bbox="272 1339 760 1562"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>NO<sub>x</sub></td> <td>1.02 tpy</td> </tr> <tr> <td>CO</td> <td>0.72 tpy</td> </tr> <tr> <td>VOC (combustion)</td> <td>0.047 tpy</td> </tr> <tr> <td>VOC (curing)</td> <td>1.10 tpy</td> </tr> <tr> <td>PM<sub>10</sub></td> <td>0.065 tpy</td> </tr> </tbody> </table> <p>Annual emissions must be calculated from actual fuel consumption consistent with the methodology described in the Technical Support Document for this Air Discharge Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO <sub>x</sub>	1.02 tpy	CO	0.72 tpy	VOC (combustion)	0.047 tpy	VOC (curing)	1.10 tpy	PM <sub>10</sub>	0.065 tpy	5
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<b>Req. No.</b>	<b>Emission Limits</b>	<b>Equipment/ Activity ID No.</b>										
7.	<p>Combined emissions from Burn Off Oven operation must not exceed:</p> <table border="0"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>NO<sub>x</sub></td> <td>0.78 tpy</td> </tr> <tr> <td>CO</td> <td>0.39 tpy</td> </tr> <tr> <td>VOC</td> <td>0.10 tpy</td> </tr> <tr> <td>PM<sub>10</sub></td> <td>0.39 tpy</td> </tr> </tbody> </table> <p>Annual emissions must be calculated from actual hours of operation consistent with the methodology described in the Technical Support Document for this Air Discharge Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO <sub>x</sub>	0.78 tpy	CO	0.39 tpy	VOC	0.10 tpy	PM <sub>10</sub>	0.39 tpy	6
<u>Pollutant</u>	<u>Emission Limit</u>											
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8.	Visible emissions from approved operations must not exceed 0% 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).	1-6										

### Operating Limits and Requirements

<b>Req. No.</b>	<b>Operating Limits and Requirements</b>	<b>Equipment/ Activity ID No.</b>
9.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
10.	The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facility-wide
11.	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.	1-6
12.	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.	1-6
13.	Melting Furnaces must only process aluminum ingot or clean scrap. Pre-cleaning or other treatment of metal feedstock with solvents prior to melting is prohibited.	1
14.	Shot Machines must be fully enclosed and vented to the associated filter system at all times when in operation.	2
15.	All powder coating must be performed in an enclosed powder coat booth. Airflow through the booth must be adequate to contain powder overspray within the booth at all times while coating is being performed. Exhaust from the booth must be discharged inside the building envelope.	5
16.	Burn Off Ovens must only be used to remove powder coatings from reject parts and tools used in the powder coating process.	6

<b>Req. No.</b>	<b>Operating Limits and Requirements</b>	<b>Equipment/ Activity ID No.</b>
17.	Each Burn Off Oven must be equipped with a thermocouple and digital readout for the purpose of monitoring oxidizer chamber operating temperature.	6
18.	Oxidizer chamber operating temperature must be maintained at 1,450 °F or greater during Burn Off Oven operation.	6
19.	Approved equipment must only be fired on natural gas.	3-6
20.	Exhaust air from approved equipment 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, 3-6

### Monitoring and Recordkeeping Requirements

<b>Req. No.</b>	<b>Monitoring and Recordkeeping Requirements</b>	<b>Equipment/ Activity ID No.</b>
21.	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
22.	For each product used or produced at the facility that contains VOC, HAP, or TAP, the Permittee must maintain purchase receipts for quantities, Safety Data Sheet information, and Technical Data Sheets in a readily accessible form.	Facility-wide
23.	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.	1-6
24.	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.	1-6
25.	Excess emissions must be recorded for each occurrence.	1-6
26.	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) Quantity and type of metal melted                      Recorded annually</li> <li>(b) Hours of Shot Machine filter system                      Recorded annually operation</li> <li>(c) Quantity and type of powder coating                      Recorded annually purchased</li> <li>(d) Quantity of natural gas consumed                      Recorded annually</li> <li>(e) Hours of Burn Off Oven operation                      Recorded annually</li> <li>(f) Maintenance and repair activities with                      Recorded for each occurrence the potential to affect emissions</li> </ul>	1-6
27.	The Permittee must maintain purchase receipts and safety data sheet (SDS) information for all metal feedstock and powder coatings consumed at the facility.	1-6

**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>
28.	<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> <ul style="list-style-type: none"> <li>(a) Date and time of the complaint;</li> <li>(b) Name of the complainant;</li> <li>(c) Nature of the complaint; and</li> <li>(d) Description of corrective action taken in response to complaint (if any).</li> </ul>	Facility-wide
29.	<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"> <li>(a) A description of the product (e.g., metal, powder coating, solvent, etc.), Safety Data Sheet information, and the location where the product will be used;</li> <li>(b) The date by which the Permittee intends to begin use of the product;</li> <li>(c) The amount of product expected to be used;</li> <li>(d) A quantification of the change in VOC, HAP and TAP emissions from use of the product; and</li> <li>(e) A summary of any applicable requirement that would apply as a result of using the product.</li> </ul> <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>	Facility-wide
30.	<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; and</li> <li>(c) No later than 30 days after the end of the month of discovery for all other excess emissions.</li> </ul>	1-6
31.	<p>Initial start-up of SWCAA approved emission units must be reported to SWCAA in writing within 10 days of commencing regular operation.</p>	1-6



Req. No.	Reporting Requirements	Equipment/ Activity ID No.
32.	<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) Quantity and type of metal melted;</li> <li>(b) Hours of Shot Machine filter system operation;</li> <li>(c) Quantity and type of powder coating purchased;</li> <li>(d) Quantity of natural gas consumed;</li> <li>(e) Hours of Burn Off Oven operation; and</li> <li>(f) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs).</li> </ul>	1-6

### 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 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.