



December 18, 2024

Mr. Brian Harris, Regional EHS Manager
Greenberry Industrial
600 SE Maritime Avenue, Suite 190
Vancouver, WA 98661

Subject: Final Air Discharge Permit for Metal Fabrication Facility

Dear Mr. Harris:

A final determination to issue Air Discharge Permit 24-3677 (ADP 24-3677) has been completed for Air Discharge Permit (ADP) Application CL-3281 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 CL-3281 was published in the permit section of SWCAA's internet website on October 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 24-3677 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 24-3677 and Technical Support Document





SWCAA
Southwest Clean Air Agency

**AIR DISCHARGE PERMIT
24-3677**

Issued: December 18, 2024

Greenberry Industrial
3000 SE Hidden Way, Vancouver, WA 98661

SWCAA ID - 2404

REVIEWED BY:


Clinton Lamoreaux, Chief Engineer



APPROVED BY:


Uri Papish, Executive Director

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1. Equipment/Activity Identification

ID No.	Equipment/Activity	Control Measure/Equipment
1	Kinetic Plasma Cutting Table	Process Enclosure, Cartridge Collector (Kinetic – 3,400 acfm)
2	Welding Operations	Portable Filtration Units

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>Emissions from the Kinetic plasma cutting table must not exceed the following:</p> <table border="0"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>NO_x</td> <td>2.69 tpy</td> </tr> <tr> <td>PM₁₀/PM_{2.5}</td> <td>0.061 tpy</td> </tr> <tr> <td></td> <td>0.005 gr/dscf (1-hr avg)</td> </tr> </tbody> </table> <p>Annual emissions must be calculated based on actual hours of operation consistent with methodology from Section 6 of the Technical Support Document.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO _x	2.69 tpy	PM ₁₀ /PM _{2.5}	0.061 tpy		0.005 gr/dscf (1-hr avg)	1
<u>Pollutant</u>	<u>Emission Limit</u>									
NO _x	2.69 tpy									
PM ₁₀ /PM _{2.5}	0.061 tpy									
	0.005 gr/dscf (1-hr avg)									
2.	<p>Emissions from welding operations 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>PM₁₀</td> <td>0.29 tpy</td> </tr> <tr> <td>Chromium (VI)</td> <td>0.037 lb/yr</td> </tr> <tr> <td>Manganese</td> <td>33.75 lb/yr</td> </tr> </tbody> </table> <p>Annual emissions must be calculated from actual weld rod consumption consistent with the methodology described in the Technical Support Document for this Air Discharge Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM ₁₀	0.29 tpy	Chromium (VI)	0.037 lb/yr	Manganese	33.75 lb/yr	2
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PM ₁₀	0.29 tpy									
Chromium (VI)	0.037 lb/yr									
Manganese	33.75 lb/yr									
3.	<p>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).</p>	1-2								

Operating Limits and Requirements

Req. No.	Operating Limits and Requirements	Equipment/Activity ID No.
4.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
5.	The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facility-wide
6.	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.	1-2
7.	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.	1-2
8.	Emissions from the Kinetic plasma cutting table must be vented to the associated dust collection system when in operation. The dust collection system must be equipped with properly fitted particulate filters.	1
9.	The Kinetic plasma cutting table dust collector must be equipped with an operable pressure gauge capable of continuously measuring the differential pressure across filtration media in the unit.	1
10.	Welding fumes from the welding of stainless material must be controlled with portable filtration units (Lincoln X-Tractor or equivalent).	2

Monitoring and Recordkeeping Requirements

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
11.	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
12.	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.	1-2
13.	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.	1-2
14.	Excess emissions and upset conditions must be recorded for each occurrence.	1-2

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.												
15.	<p>The following information must be collected, recorded at the intervals specified below, and readily available on-site for inspection:</p> <table border="0"> <tr> <td data-bbox="235 300 873 338">(a) Hours of cutting table operation</td> <td data-bbox="883 300 1268 338">Recorded annually</td> </tr> <tr> <td data-bbox="235 338 873 407">(b) Pressure drop across dust collector filter media</td> <td data-bbox="883 338 1268 407">Recorded weekly</td> </tr> <tr> <td data-bbox="235 407 873 445">(c) Quantity and type of welding rod/wire use</td> <td data-bbox="883 407 1268 445">Recorded annually</td> </tr> <tr> <td data-bbox="235 445 873 483">(d) Make/model of dust collector filter media</td> <td data-bbox="883 445 1268 483">Recorded for each filter set</td> </tr> <tr> <td data-bbox="235 483 873 520">(e) Dust collector filter changes</td> <td data-bbox="883 483 1268 520">Recorded for each occurrence</td> </tr> <tr> <td data-bbox="235 520 873 590">(f) Maintenance and repair activities with the potential to affect emissions</td> <td data-bbox="883 520 1268 590">Recorded for each occurrence</td> </tr> </table>	(a) Hours of cutting table operation	Recorded annually	(b) Pressure drop across dust collector filter media	Recorded weekly	(c) Quantity and type of welding rod/wire use	Recorded annually	(d) Make/model of dust collector filter media	Recorded for each filter set	(e) Dust collector filter changes	Recorded for each occurrence	(f) Maintenance and repair activities with the potential to affect emissions	Recorded for each occurrence	1-2
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Emission Monitoring and Testing Requirements

There are no emission monitoring or testing requirements for the approved equipment cited in this ADP.

Reporting Requirements

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
16.	<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> <ol style="list-style-type: none"> Date and time of the complaint; Name of the complainant; Nature of the complaint; and Description of corrective action taken in response to complaint (if any). 	Facility-wide
17.	<p>The permittee must notify SWCAA at least seven calendar days in advance of the use of any new material which results in the emission of toxic or hazardous air pollutants. In response to the notification, SWCAA may require that a written report be submitted with the following:</p> <ol style="list-style-type: none"> A description of the proposed change(s) in materials with an SDS for each new material, The date the change(s) is (are) to be made, The change(s) in emissions of VOCs, HAPs and TAPs occurring as a result of the change, and A summary of any applicable requirement(s) that would apply as a result of the change(s). <p>If the proposed emission rate of a new TAP exceeds the applicable SQER and/or other emission limits established by this Permit or otherwise circumvents an applicable requirement, New Source Review may be required prior to making the proposed change.</p>	Facility-wide

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
18.	<p>Excess emissions must be reported to SWCAA as follows:</p> <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; and (c) No later than 30 days after the end of the month of discovery for all other excess emissions. 	1-2
19.	<p>The following emission-related information must be reported to SWCAA by March 15th for the previous calendar year:</p> <ul style="list-style-type: none"> (a) Hours of cutting table operation; (b) Quantity and type of welding rod/wire use; and (c) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs). 	1-2

3. General Provisions

Req. No.	General Provisions
A.	<p>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.</p>
B.	<p>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.</p>
C.	<p>The requirements of this ADP survive any transfer of ownership of the source or any portion thereof.</p>
D.	<p>This ADP must be posted conspicuously at or be readily available near the source.</p>
E.	<p>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.</p>
F.	<p>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.</p>
G.	<p>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.</p>

Req. No.	General Provisions
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.