

March 5, 2025

Jeff Stalcup H B Fuller 417 NW 136th Street Vancouver, Washington 98685

RE: Final Air Discharge Permit for New Corona Treater

Dear Mr. Stalcup:

A final determination to issue Air Discharge Permit (ADP) 25-3688 has been completed for ADP application CL-3285 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-3285 was published in the permit section of SWCAA's website on January 17, 2025. 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 25-3688 and the associated Technical Support Document are available for public review in the "Recent Air Discharge Permits" section under the "Air Permits" link on SWCAA's website (http://www.swcleanair.gov). Original copies are enclosed for your files.

ADP 25-3688 may be appealed directly to the Pollution Control Hearings Board (PCHB) within thirty (30) days of receipt as provided in Revised Code of Washington (RCW) 43.21B.

If you have any questions or comments, or desire additional information, please contact me or Vannessa McClelland at (360) 574-3058, extension 129.

Sincerely,

Uri Papish

Executive Director

UP:VM

Enclosure: Technical Support Document and Air Discharge Permit 25-3688



AIR DISCHARGE PERMIT 25-3688

Issued: March 5, 2025

H B Fuller

417 NW 136th Street Vancouver, Washington 98685

SWCAA ID - 146

REVIEWED BY: <u>Clid</u>

Clinton Lamoreaux, Chief Engineer

APPROVED BY:

Uri Papish, Executive Director

TABLE OF CONTENTS

1. Equipment/Activity Identification	1
2. Permit Requirements	1
Emission Limits	1
Operating Limits and Requirements	3
Monitoring and Recordkeeping Requirements	4
Emission Monitoring and Testing Requirements	5
Reporting Requirements	5
3. General Provisions	7

1. Equipment/Activity Identification

ID No.	Equipment/Activity	Control Equipment/Measure
110.		
1	Three Hot Melt Mixing Tanks Line 17 (Corona Treater)	Filtration and carbon adsorption
2	Twelve Tape Lines Line 12 (Corona Treater)	Filtration and carbon adsorption
3	Three String Lines	Filtration and carbon adsorption
4	Line 13 (Corona Treater)	Filtration and carbon adsorption
5	Research and Development Area Line 11 (Corona Treater)	Filtration and carbon adsorption
6	West-CHSO #2012179 Heater	Low-sulfur fuel (natural gas)
7	Twelve Process Area Comfort Heaters	Low-sulfur fuel (natural gas)

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.

ADP 25-3688 supersedes ADP 02-2432R5 in its entirety.

Emission Limits

Req. No.	Emiss	sion Limits	Equipment/ Activity ID No.
1.	Emissions from the facility must not ex	xceed any of the following:	Facility-wide
	Pollutant	Emission Limit	
	Volatile Organic Compounds	9.9 tons per year	
	Particulate Matter, PM ₁₀ , total	14.5 tons per year	
	Acetaldehyde	1,150 pounds per year	
		mission factors from the most recent source It and finished product produced consistent rt Document (TSD) for this ADP.	

Req. No.	Emiss	ion Limits		Equipment/ Activity ID No.
2.	Emissions from the hot melt mixing tan	It mixing tanks must not exceed any of the following:		
	Pollutant	E	mission Limit	
	Volatile Organic Compounds	0.00083 p	oounds per pound of hot (1-hour average).	
	Particulate Matter, PM ₁₀ , total	0.00016 p	oounds per pound of hot t (1-hour average)	
	Emissions must be calculated consistent	t with Section	on 6 of the TSD for this ADP.	
3.	Emissions from the coating operation n	nust not exc	eed any of the following:	2 - 5
	Pollutant	E	mission Limit	
	Volatile Organic Compounds		pounds per pound of roduct (1-hour average).	
	Particulate Matter, PM ₁₀ , total	0.0012	pounds per pound of roduct (1-hour average)	
	Emissions must be calculated consistent	t with Section	on 6 of the TSD for this ADP.	
4.	Emissions from the West-CHSO #2012	2179 must n	ot exceed any of the following	6
	Pollutant	Emiss	ion Limit	
		ounds per ear	80 ppmvd @ 3% O ₂ (1-hour average)	
		ounds per ear	110 ppmvd @ 3% O ₂ (1-hour average)	
	Emissions must be calculated consistent	t with Section		
5.	Emissions from the West-CHSO #20 Heaters must not exceed any of the following		ter and Process Area Comfor	t 6 - 7
	Pollutant		ion Limit	
	5	s per year	100 lb/MMscf	
	Carbon Monoxide 0.5 ton	s per year	84 lb/MMscf	
	Emission must be calculated consistent	with Section	on 6 of the TSD for this ADP.	

Req. No.	Emission Limits	Equipment/ Activity ID No.
6.	Emissions from Line 12 must not exceed any of the following:	2
	Pollutant Emission Limit	
	Ozone 400 pounds per year	
	Emission must be calculated using emission factors from the most recent source test(s) and the kW-hrs of operation. If source test data is not available, an emission factor of 0.007 lb/kW-hr shall be used consistent with Section 6 of the TSD for this ADP.	
7.	Emissions from Line 17 must not exceed any of the following:	1
	Pollutant Emission Limit Ozone 184 pounds per year Emission must be calculated using emission factors from the most recent source	
	test(s) and the kW-hrs of operation. If source test data is not available, an emission factor of 0.007 lb/kW-hr shall be used consistent with Section 6 of the TSD for this ADP.	
8.	Visible emissions from the equipment (not including natural gas-fired equipment) must not exceed ten percent (10%) opacity for more than three (3) minutes in any one-hour period as determined in accordance with SWCAA Method 9.	1 - 5
9.	Visible emissions from the natural gas-fired equipment must not exceed zero percent (0%) opacity for more than three (3) minutes in any one-hour period as determined in accordance with SWCAA Method 9.	6 - 7

Operating Limits and Requirements

Req.	Oneveting Limits and Dequipements	Equipment/ Activity ID No.
110.	Operating Limits and Requirements	110.
10.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
11.	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
12.	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.	1 - 7

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
13.	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.	1 - 5
14.	The particulate filters and carbon adsorbers for vent lines from the hot melt mixing tanks, tape lines, string lines, Line 13, research and development area, and creeling area must be inspected at least once every 3 months. Exhausted or plugged filters and carbon adsorbers must be replaced as necessary. More frequent filter inspection and maintenance must be conducted if necessary.	1 - 5
15.	With the exception of the Process Area Comfort Heaters, the exhaust of equipment addressed by this ADP must be discharged vertically above the level of the building roof. Any rain cap or device that obstructs or prevents the vertical flow of exhaust gas is prohibited.	1 - 6

Monitoring and Recordkeeping Requirements

Req.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
16.	Except for 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.	1 - 7
17.	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.	1 - 7
18.	Excess emissions and upset conditions must be recorded for each occurrence.	1 - 7

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
19.	The following information must be collected, recorded at the intervals specified	1 - 7
	below, and readily available on-site for inspection:	
	(a) The quantity of hot melt produced must be recorded monthly;	
	(b) The quantity of coated product produced must be recorded monthly;	
	(c) The quantity of natural gas utilized by the facility must be recorded monthly;	
	(d) The kW-hrs of operation of each corona treater (Line 11, Line 12, Line 13, Line 17) must be recorded annually;	
	(e) An estimate of the projected annual amount of VOC to be used at the facility in the next 12 months (as required by 40 CFR 60.744(b)(1)) must be recorded semi-annually;	
	(f) The actual amount of VOC used at the facility must be recorded monthly as required by 40 CFR 60.744(b)(2); and	
	(g) Maintenance activities that may affect emissions to the ambient air must be logged for each occurrence.	

Emission Monitoring and Testing Requirements

Req. No.	Emission Monitoring and Testing Requirements	Equipment/ Activity ID No.
20.	The hot melt mixing tanks exhaust and one coating line(s) exhaust must be emission tested once every five (5) years as described in Appendix A.	1 - 5

Reporting Requirements

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
21.	Upset conditions must be reported to SWCAA as soon as possible after discovery by phone call or phone message, email, or fax. It is the Permittee's responsibility to verify that the upset conditions information was received.	Facility-wide
22.	 Excess emissions must be reported to SWCAA as follows: (a) As soon as possible, but no later than twelve (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 forty-eight (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 thirty (30) calendar days after the end of the month of discovery for all other excess emissions. 	Facility-wide
23.	Deviations from permit conditions must be reported as soon as possible but no later than thirty (30) days after the end of the month during which the deviation is discovered.	Facility-wide

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
24.	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
25.	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: (a) A description of the type of product, the Safety Data Sheets and Technical Data Sheets, and the location where the product will be used; (b) The date by which the Permittee intends to begin use of the product; (c) The amount (gallons or lbs) expected to be used; (d) A quantification of the change in VOC, HAP and TAP emissions from the use of the product; and (e) A summary of any applicable requirement that would apply as a result of the product. 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. Any new product that is only to be used for testing purposes with a quantity of five (5) gallons or less of usage does not need to be reported to SWCAA prior to use.	1 - 5
26.	An annual emissions inventory report must be submitted to SWCAA by March 15 for emissions from the previous calendar year in accordance with SWCAA 400-105(1). Each report must contain, at a minimum, the following information: (a) The annual sum of emissions of NO _x , CO, VOC, PM, PM ₁₀ , PM _{2.5} , SO ₂ , TAPs, and HAPs; (b) The quantity of hot melt produced; (c) The quantity of coated product produced; (d) The quantity of natural gas utilized for the facility; and (e) The total kW-hrs of operation of each corona treater.	1 - 7
27.	An estimate of the projected annual amount of VOC to be used at the facility shall be submitted by March 15 th and September 15 th for the 12-month periods beginning in January and July respectively.	1 - 5
28.	The results of all emission testing required by this ADP must be reported to SWCAA in writing within forty-five (45) calendar days of test completion.	1 - 5

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.
В.	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.
J.	The Southwest Clean Air Agency may, in accordance with RCW 70A.15, impose such conditions as are reasonably necessary to ensure 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.

Appendix A Emission Testing Requirements Hot Melt Mixing and Coating Operations

1. Background

The purpose of this testing is to quantify emissions from the hot melt mixing and coating operations and to provide an adequate assurance of compliance with the terms and conditions of this ADP.

2. Test Constituents and Test Methods

- a. The testing shall be performed at the hot melt tanks exhaust stack, one of the coating lines exhaust stacks, and the exhaust of either Line 11, Line 12, Line 13, or Line 17 at the facility. The coating lines exhaust stack with the greatest potential emissions shall be chosen for source testing unless an alternate is approved in advance by SWCAA.
- b. Source testing shall be conducted no later than the end of April every five years following the April 12/13, 1995, source test unless an alternative schedule is approved by SWCAA.

Three sampling runs shall be conducted at the hot melt exhaust and the exhaust of one coating line using the methods and test durations specified below.

8 8	1	Minimum
Constituent	Test Method or Equivalent	Test Duration
Stack gas flow rate, temperature	EPA Methods 1 and 2	N/A
O ₂ , CO ₂ content	EPA Method 3A	60 minutes
Stack gas moisture content	EPA Method 4	60 minutes
Filterable particulate matter	EPA Method 5	60 minutes
Opacity	EPA Method 9	60 minutes ¹
Condensable particulate matter	EPA Method 202	60 minutes
Volatile organic compounds	EPA Methods TO-12/TO-14	60 minutes
Acetaldehyde	ALDACHEM TM -SG sampling	60 minutes
	media, ALDANAL SM -SG analysi	is
	or TO-5	

¹ A single 60-minute opacity test may be performed.

Three sampling runs shall be conducted at the exhaust of Line 11, Line 12, Line 13, or Line 17 using the methods and test durations specified below.

		Minimum
Constituent	Test Method or Equivalent	Test Duration
Stack gas flow rate, temperature	EPA Methods 1 and 2	N/A
Ozone	Colorimetric Detector Tube or	Variable
	OSHA ID-214	

Appendix A Emission Testing Requirements Hot Melt Mixing and Coating Operations

3. Test Plan and Notification

A comprehensive test plan must be submitted to SWCAA for review and approval a minimum of ten (10) business days prior to the proposed test date. SWCAA must be notified a minimum of three (3) business days prior to the proposed test date so that a SWCAA representative may be present during testing.

4. Reporting Requirements

Unless otherwise directed by SWCAA, a final test report must be prepared and submitted in an approved electronic format to SWCAA within forty-five (45) calendar days of test completion and, at a minimum, must contain the following information:

- a. A brief description of the purpose of the test, for example, an initial test, a periodic test required by an ADP, a test required by a federal, state, or local rule or regulation, or a test required to determine compliance with a Notice to Correct;
- b. Description of the unit being tested, including manufacturer, model number, serial number, and design capacity of the equipment;
- c. The location and description of the discharge point (stack, port, etc.), including the dimensions (diameter, length and width, or other) and height above ground level. A photo of the discharge point is highly recommended;
- d. The location of the sample ports or test location and a description of how the sampling location relates to the discharge point. For example, the sampling location may be in a square duct some distance away from the discharge point, which is a round stack. A photo of the sample ports or test location is highly recommended;
- e. Time and date of the test and identification and qualifications of the personnel involved;
- f. Summary of results, reported in units and averaging periods consistent with the application emissions standard or unit;
- g. Summary of air pollution control systems or equipment operating conditions during the test;
- h. Summary of production related parameters, which may include fuel type, operating temperature, process throughput, pressure or pressure drop, pH, recirculation rates, or other parameters unique to the operation of the unit being tested;
- i. A description of the test methods or procedures used, including all field data, quality assurance/quality control procedures and documentation;
- j. A description of the analytical procedures used, including all laboratory data, quality assurance/quality control procedures and documentation;
- k. Copies of field data and example calculations;
- 1. Chain of custody information;
- m. Calibration documentation;
- m. Discussion of any abnormalities associated with the results; and
- o. A statement signed by the senior management official of the testing firm certifying the validity of the source test report. Reports with material mistakes or misinformation may be rejected by SWCAA.

Appendix A Emission Testing Requirements Hot Melt Mixing and Coating Operations

5. Changes to Testing Requirements

The source test must be conducted as specified in the sections above. The Permittee may submit a written request to SWCAA for approval of minor modifications to the requirements above or the testing schedule. Upon review of the request and in accordance with EPA delegation, SWCAA will inform the Permittee in writing of any approved modifications.