



March 10, 2025

Tony Lemon
Novolex Bagcraft
6416 NW Whitney Road
Vancouver, WA 98665

RE: Final Air Discharge Permit for New Bag Making Line 607

Dear Tony Lemon:

A final determination to issue Air Discharge Permit (ADP) 25-3691 has been completed for ADP application CL-3287 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-3287 was published in the permit section of SWCAA's website on February 5, 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 25-3691 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 25-3691 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 Abraham Apfel at (360) 574-3058, extension 124.

Sincerely,

Uri Papish
Executive Director

UP:AA

Enclosure: Technical Support Document and Air Discharge Permit 25-3691





**AIR DISCHARGE PERMIT
25-3691**

Issued: March 10, 2025

Novolex Bagcraft
6416 Whitney Road Vancouver, Washington 98665

SWCAA ID – 1560



REVIEWED BY: Clinton H. Lamoreaux
Clinton Lamoreaux, Chief Engineer

APPROVED BY: Uri Papish
Uri Papish, Executive Director

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1. Equipment/Activity Identification

ID No.	Equipment/Activity	Control Equipment/Measure
1	#1 Fruit Press (Strachan Henshaw SN 4307/1)	Low-VOC Ink
2	#2 Fruit Press (Strachan Henshaw SN 4380/1)	Low-VOC Ink
3	#3 Fruit Press (Strachan Henshaw SN 4380/2)	Low-VOC Ink
4	Wolverine Press (SN HLRE-768)	Low-VOC Ink
5	Hudson Sharpe Press (SN 3088) with Maxon Dryer	Low-VOC Ink, Low Sulfur Fuel (natural gas)
6	Pear Wrap Press/Coater (Faustell)	Low-VOC Ink
7	Two Shopper Bag Making Machines (Newlong)	Low-VOC Ink
8	Two Folder Gluers (Wolverine Cub)	Low-VOC Ink
9	Two Grocery Bag Making Machines (Weber) with presses / Line 603	Low-VOC Ink
10	Two Shopper Bag Making Machines (Garant) with presses / Lines 605 and 606	Low-VOC Ink
11	Shopper Bag Making Machines (Garant) with press / Line 607	Low-VOC Ink
12	Seventeen Space Heaters (3.4 MMBtu/hr total)	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 25-3691 supersedes ADP 21-3451 in its entirety.

Emission Limits

Req. No.	Emission Limits	Equipment/ Activity ID No.									
1.	<p>Emissions of from printing and gluing operations must not exceed the following:</p> <table border="0" data-bbox="289 394 1242 609"> <tr> <td><u>Pollutant</u></td> <td><u>Emission Limit</u></td> </tr> <tr> <td>VOC</td> <td>11.79 tons per year</td> </tr> <tr> <td>TAPs</td> <td>Limited to SQER for each pollutant. Combined TAPs (not including acetone or other non-VOC TAPs) must not exceed the VOC emission limit established above</td> </tr> </table> <p>Emissions must be calculated based on actual material consumption, manufacturer's material data, and material balance methodology consistent with Section 6 of the Technical Support Document (TSD) for this ADP. The material balance must include ink, coatings, and solvent purchases and beginning inventory, returns, ending inventory, and waste shipped off-site.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	VOC	11.79 tons per year	TAPs	Limited to SQER for each pollutant. Combined TAPs (not including acetone or other non-VOC TAPs) must not exceed the VOC emission limit established above	1-11			
<u>Pollutant</u>	<u>Emission Limit</u>										
VOC	11.79 tons per year										
TAPs	Limited to SQER for each pollutant. Combined TAPs (not including acetone or other non-VOC TAPs) must not exceed the VOC emission limit established above										
2.	<p>Emissions from natural gas combustion from the space heaters and Hudson Sharp press dryer Maxon burner must not exceed the following:</p> <table border="0" data-bbox="289 951 1149 1098"> <tr> <td><u>Pollutant</u></td> <td><u>Emission Limit (1-hr average)</u></td> <td><u>Emission Limit</u></td> </tr> <tr> <td>NO_x</td> <td>0.43 pound per hour</td> <td>1.89 tons per year</td> </tr> <tr> <td>CO</td> <td>0.36 pound per hour</td> <td>1.59 tons per year</td> </tr> </table> <p>Emissions must be calculated consistent with the methodology and emission factors presented in Section 6 of the TSD for this ADP.</p>	<u>Pollutant</u>	<u>Emission Limit (1-hr average)</u>	<u>Emission Limit</u>	NO _x	0.43 pound per hour	1.89 tons per year	CO	0.36 pound per hour	1.59 tons per year	5 and 12
<u>Pollutant</u>	<u>Emission Limit (1-hr average)</u>	<u>Emission Limit</u>									
NO _x	0.43 pound per hour	1.89 tons per year									
CO	0.36 pound per hour	1.59 tons per year									
3.	<p>Visible emissions from the approved 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 (See Appendix A of SWCAA 400).</p>	1-12									

Operating Limits and Requirements

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
4.	<p>Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.</p>	Facility-wide
5.	<p>Operations that cause or contribute to a nuisance odor must use recognized good practice and procedures to reduce these odors to a reasonable minimum.</p>	Facility-wide

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
6.	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.	1-12
7.	All containers for VOC containing materials must be kept securely closed with a lid in place except when in active use. Open containers for storage or disposal of VOC containing materials are prohibited. In addition, all VOC containing materials used to clean and/or flush equipment or lines during clean up must be collected and stored in a closed container. Disposal of rags and wipes must be in a manner that minimizes fugitive emissions of VOCs.	Facility-wide

Monitoring and Recordkeeping Requirements

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
8.	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.	1-12
9.	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.	Facility-wide
10.	Excess emissions and upset conditions must be recorded for each occurrence.	Facility-wide
11.	For each for product used or produced at the facility that contains VOC, HAP, or TAP, the Permittee must maintain purchase receipts for quantities, Safety Data Sheet (SDS) information, and Technical Data Sheets (TDS) in a readily accessible form.	1-11
12.	Operational data must be monitored and recorded as follows: <ul style="list-style-type: none"> (a) Ink, solvent, and glue consumption Recorded monthly (b) Natural gas consumption Recorded monthly (c) Type and quantity of hazardous waste disposal Each occurrence (d) Equipment repair and maintenance activity Each occurrence 	1-12

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.
13.	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
14.	<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 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
15.	Deviations from permit conditions must be reported as soon as possible but no later than 30 days after the end of the month during which the deviation is discovered.	Facility-wide
16.	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
17.	<p>SWCAA must be notified at least seven (7) days in advance of the use of any new material in excess of five (5) gallons which will result in emissions of toxic or hazardous air pollutants not listed in Section 6 of the TSD for this ADP. The written notice must include the following:</p> <ul style="list-style-type: none"> (a) A description of the proposed change(s) in materials with an SDS for each new material, (b) The date the change(s) is (are) to be made, (c) The change(s) in emissions of VOCs, HAPs, and TAPs occurring as a result of the change, and (d) 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 SQER and/or the VOC limit established in this ADP or otherwise circumvents an applicable requirement including those established by this ADP, New Source Review is required prior to making the proposed change.</p>	Facility-wide
18.	<p>An annual emissions inventory report must be submitted to SWCAA by March 15th for emissions from the previous calendar year in accordance with SWCAA 400-105(1). Each report must contain, at a minimum, the following information:</p> <ul style="list-style-type: none"> (a) The annual sum of emissions of NO_x, CO, VOC, SO₂, PM, PM₁₀, PM_{2.5}, TAPs, and HAPs; (b) The quantity of each product consumed (gallons or pounds) containing VOCs, HAPS, or TAPs; (c) The quantity and type of hazardous waste disposed; and (d) The quantity of natural gas consumption. 	1-12

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.
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.