



March 26, 2025

Mr. Gregory Sword, Vice President  
Fabrication Products, Inc.  
4201 NE Minnehaha Street  
Vancouver, WA 98661

Subject: Final Air Discharge Permit for Relocation of Blasting Operation

Dear Mr. Sword:

A final determination to issue Air Discharge Permit 25-3693 (ADP 25-3693) has been completed for Air Discharge Permit (ADP) Application CL-3291 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-3291 was published in the permit section of SWCAA's internet website on February 27, 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 was not provided for this permitting action. Electronic copies of ADP 25-3693 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 25-3693 and Technical Support Document





**AIR DISCHARGE PERMIT  
25-3693**

**Issued: March 26, 2025**

**Fabrication Products, Inc.  
4201/4220 NE Minnehaha Street, Vancouver, WA 98661**

**SWCAA ID - 1329**

REVIEWED BY:

  
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Clinton Lamoreaux, Chief Engineer



APPROVED BY:

  
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Uri Papish, Executive Director

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## 1. Equipment/Activity Identification

ID No.	Equipment/Activity	Control Measure/Equipment
1	Welding	Building Enclosure
2	Spray Painting	Process Enclosure, Fabric Filtration
3	Abrasive Blasting	Process Enclosure, High Efficiency Filtration
4	Wheelabrator-Frye Shot Blasting Plant	Process Enclosure, High Efficiency Filtration
5	SteelPro 700 Cutting Table	Process Enclosure, High Efficiency Filtration
6	SteelPro 600 Beam Line	Process Enclosure, High Efficiency Filtration
7	SteelPro 900 Beam Line	Process Enclosure, High Efficiency Filtration

## 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.

ADP 25-3693 supersedes ADP 20-3391 in its entirety.

### Emission Limits

Req. No.	Emission Limits	Equipment/Activity ID No.
1.	Emissions of VOCs must not exceed 10.0 tons per year for the entire facility.  Annual emissions must be calculated based on actual material consumption consistent with the methodology described in the Technical Support Document for this Permit.	Facility-wide
2.	Facility-wide toxic air pollutant (TAP) emissions must not individually exceed the Small Quantity Emission Rate identified in WAC 173-460. The sum of the VOCs, including those that are TAPs, must not cause the facility-wide VOC emission limit to be exceeded.  Annual emissions must be calculated based on actual material consumption consistent with the methodology described in the Technical Support Document for this Permit.	Facility-wide
3.	Emissions of particulate matter from welding and metal fabrication activities must not exceed 0.49 tons per year.  Annual emissions must be calculated based on actual welding rod/wire consumption consistent with the methodology described in the Technical Support Document for this Permit.	1

<b>Req. No.</b>	<b>Emission Limits</b>	<b>Equipment/ Activity ID No.</b>
2.	Emissions of particulate matter (PM/PM <sub>10</sub> /PM <sub>2.5</sub> ) from the Abrasive Blasting dust collector must not exceed: (a) 0.005 gr/dscf (1-hour average) (b) 0.86 tons per year  Annual emissions must be calculated based on actual hours of operation consistent with the methodology described in the Technical Support Document for this Permit.	3
3.	Emissions of particulate matter from the Wheelabrator-Frye baghouse must not exceed: (a) 0.005 gr/dscf (1-hour average) (b) 0.79 tons per year  Annual emissions must be calculated based on actual hours of operation consistent with the methodology described in the Technical Support Document for this Permit.	4
4.	Emissions of particulate matter (PM, PM <sub>10</sub> , and PM <sub>2.5</sub> ) from the SteelPro 700 Cutting Table dust collector must not exceed 0.005 gr/dscf (1-hour average).	5
5.	Emissions of particulate matter (PM/PM <sub>10</sub> /PM <sub>2.5</sub> ) from the SteelPro 600 Beam Line dust collector must not exceed: (a) 0.005 gr/dscf (1-hour average) (b) 0.75 tons per year  Annual emissions must be calculated based on actual hours of operation consistent with the methodology described in the Technical Support Document for this Permit.	6
6.	Emissions of particulate matter (PM/PM <sub>10</sub> /PM <sub>2.5</sub> ) from the SteelPro 900 Beam Line dust collector must not exceed: (a) 0.005 gr/dscf (1-hour average) (b) 0.75 tons per year  Annual emissions must be calculated based on actual hours of operation consistent with the methodology described in the Technical Support Document for this Permit.	7
7.	Visible emissions from all emission points at the facility must not exceed zero percent 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).	1-7

### Operating Limits and Requirements

<b>Req. No.</b>	<b>Operating Limits and Requirements</b>	<b>Equipment/ Activity ID No.</b>
10.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
11.	The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facility-wide

<b>Req. No.</b>	<b>Operating Limits and Requirements</b>	<b>Equipment/ Activity ID No.</b>
12.	Open containers for storage, transfer or disposal of VOC containing materials are prohibited. All containers for materials containing VOCs must be kept securely closed with a lid in place except when materials are being added, mixed or removed. In addition, all VOC containing materials that are used to clean and/or flush spray equipment or lines during clean up must be collected in a closed container.	Facility-wide
13.	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.	1-7
14.	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.	1-7
15.	The use of coatings containing lead or hexavalent chromium compounds is prohibited.	2
16.	All spray coating must be performed with properly operating high transfer efficiency spray equipment including, but not limited to, spray guns with HVLP or air-assisted airless configurations.	2
17.	All spray coating must be performed in the painting building. All building windows and doors must remain closed during active spray painting and cleanup.	2
18.	The painting building must be equipped with particulate matter filters on the exhaust that are demonstrated to achieve 98 percent capture of paint overspray.	2
19.	A differential pressure gauge must be installed and maintained to measure pressure drop across each filter bank in the painting building. Coating overspray (exhaust) filters must be changed before differential pressure reaches 1 inch of water column.	2
20.	Filtered exhaust air from painting activities must be discharged vertically into the ambient air at a minimum stack height of 30 feet above ground level. Any device that obstructs or prevents vertical discharge is prohibited.	2
21.	A differential pressure gauge must be installed and maintained to measure pressure drop across filter media in the Abrasive Blasting dust collector.	3
22.	Filtered exhaust air from the abrasive blasting activities must be discharged vertically into the ambient air above the building roof. Any device that obstructs or prevents vertical discharge is prohibited.	3
23.	Exhaust air from the SteelPro 700 Cutting Table dust collector must be discharged vertically. Any device that obstructs or prevents vertical discharge is prohibited.	5
24.	Exhaust air from the SteelPro 600 Beam Line and the SteelPro 900 Beam Line dust collectors must be discharged vertically into the ambient air above the building roof. Any device that obstructs or prevents vertical discharge is prohibited.	6-7
25.	The SteelPro 600 Beam Line and SteelPro 900 Beam Line may only be used to cut carbon steel.	6-7

<b>Req. No.</b>	<b>Operating Limits and Requirements</b>	<b>Equipment/ Activity ID No.</b>
26.	A differential pressure gauge must be installed and maintained to measure pressure drop across filter media in each dust collector associated with the Wheelabrator-Frye Shot Blasting Plant, SteelPro 700 Cutting Table, SteelPro 600 Beam Line, and SteelPro 900 Beam Line.	4-7

### Monitoring and Recordkeeping Requirements

<b>Req. No.</b>	<b>Monitoring and Recordkeeping Requirements</b>	<b>Equipment/ Activity ID No.</b>
27.	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.	Facility-wide
28.	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.	Facility-wide
29.	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
30.	Excess emissions and upset conditions must be recorded for each occurrence.	1-7
31.	The Permittee must maintain purchase receipts and safety data sheet (SDS) information for all coating, solvent and welding products consumed at the facility in a readily accessible.	1-2
32.	The following information must be collected, recorded at the intervals specified below, and made readily available for on-site inspection: <ul style="list-style-type: none"> <li>(a) Differential pressure across filter media in each exhaust filter system and dust collector      Recorded weekly</li> <li>(b) Quantity of coating and solvent purchased      Recorded monthly</li> <li>(c) Quantity of welding rod/wire purchased      Recorded monthly</li> <li>(d) Quantity/type of hazardous waste disposal      Recorded monthly</li> <li>(e) Hours of operation for each dust collector      Recorded annually</li> <li>(f) Quantity of hours each plasma cutting system was used to cut each type of steel      Recorded annually</li> <li>(g) Quantity of Shop Heater fuel consumption      Recorded annually</li> <li>(h) Filter changes in each exhaust filter system and dust collector      Recorded for each occurrence</li> <li>(i) Maintenance and repair activities      Recorded for each occurrence</li> </ul>	1-7

**Emission Monitoring and Testing Requirements**

<b>Req. No.</b>	<b>Emission Monitoring and Testing Requirements</b>	<b>Equipment/ Activity ID No.</b>
8.	The Abrasive Blasting dust collector must be emission tested no later than the end of December 2025, and every ten years thereafter unless an alternative schedule is approved by SWCAA. All emission testing must be conducted in accordance with Appendix A of this Permit.	3

**Reporting Requirements**

<b>Req. No.</b>	<b>Reporting Requirements</b>	<b>Equipment/ Activity ID No.</b>
34.	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: (a) Date and time of the complaint; (b) Name of the complainant; (c) Nature of the complaint; and (d) Description of corrective action taken in response to complaint (if any).	Facility-wide
35.	A written report must be submitted to SWCAA at least 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 product, Safety Data Sheet information, 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 of product expected to be used; (d) A quantification of the change in VOC, HAP and TAP emissions from use of the product; and (e) A summary of any applicable requirement that would apply as a result of using 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.	Facility-wide
36.	Excess emissions must be reported to SWCAA as follows: (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.	1-7



Req. No.	Reporting Requirements	Equipment/ Activity ID No.
37.	The following emission-related information must be reported to SWCAA by March 15 <sup>th</sup> for the previous calendar year: (a) Quantity of coating and solvent purchased; (b) Quantity of welding rod/wire purchased; (c) Quantity/type of hazardous waste disposal; (d) Hours of operation for each dust collector; (e) Quantity of hours each plasma cutting system was used to cut each type of steel; (f) Quantity of Shop Heater fuel consumption; and (g) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs).	1-7
38.	Emission test results must be reported to SWCAA in writing within 45 days of test completion.	3
39.	Initial start-up of the relocated abrasive blasting operation must be reported to SWCAA in writing within 10 days of commencing regular operation.	3

### 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.

<b>Req. No.</b>	<b>General Provisions</b>
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.

## Appendix A

### Emission Testing Requirements Abrasive Blasting Dust Collector

#### 1. Introduction:

The purpose of this testing is to quantify emissions from the Abrasive Blasting dust collector, and demonstrate compliance with the requirements of this Permit and applicable air quality regulations.

#### 2. Testing Requirements:

- a. **Testing Schedule.** Emission testing of the Abrasive Blasting dust collector must be conducted no later than the end of December 2025 and no later than the end of December every 10 years thereafter. Emission testing may be conducted up to three calendar months prior to the month in which testing is due. Testing before or after the scheduled due date does not modify or reset the test schedule.
- b. **Test Plan.** A comprehensive test plan must be submitted to SWCAA for review and approval at least 10 business days prior to the proposed test date. SWCAA personnel must be informed at least 5 business days prior to testing so that a representative may be present during testing.
- c. **Test Location.** Sampling must be conducted at the dust collector exhaust stack.
- d. **Test Runs/Reference Test Methods.** A minimum of 3 test runs must be performed for each constituent listed below to ensure the data are representative. Compliance must be demonstrated by averaging the results of the individual sampling runs.

<u>Constituent</u>	<u>Reference Test Method</u>	<u>Minimum Test Run Duration</u>
Flow rate, temperature	EPA Methods 1 and 2	N/A
O <sub>2</sub> , CO <sub>2</sub> content	EPA Method 3 or 3A*	60 minutes
Moisture content	EPA Method 4	60 minutes
PM	EPA Method 5 or 17	60 minutes
Opacity	SWCAA Method 9	6 minutes**

\* Ambient concentrations of O<sub>2</sub> and CO<sub>2</sub> can be assumed instead of using Method 3

\*\* If visible emissions are observed during any 6 minute test run, the affected test run must be extended to a length of 60 minutes.

#### 3. Source Operation:

- a. **Source Operations.** Source operations during emissions testing must be representative of maximum intended operating conditions.
- b. **Record of Production Parameters.** Production related parameters and equipment operating conditions must be recorded during emissions testing to correlate operating conditions with emissions. All recorded production parameters must be documented in the test results report. At a minimum, the following parameters must be recorded:
  - (1) Startup and shutdown of process and control equipment;
  - (2) Heater fire rate; and
  - (3) Bark drying rate.

**4. Reporting Requirements:**

- a. **Test Report.** Unless otherwise directed by SWCAA, a final test report must be prepared and submitted to SWCAA in an approved form within 45 calendar days of test completion and, at a minimum, must contain the following information:
- (1) Description of the source including manufacturer, model number and design capacity of the equipment, and the location of the sample ports or test locations;
  - (2) 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;
  - (3) Time and date of the test and identification and qualifications of the personnel involved, including SWCAA personnel who observed the testing;
  - (4) 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;
  - (5) 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;
  - (6) Summary of results, reported in units and averaging periods consistent with the applicable emissions standard or unit;
  - (7) Summary of control system or equipment operating conditions;
  - (8) Summary of production related parameters, including those cited in Section 3;
  - (9) A description of the test methods or procedures used, including all field data, quality assurance/quality control procedures and documentation;
  - (10) A description of the analytical procedures used, including all laboratory data, quality assurance/quality control procedures and documentation;
  - (11) Copies of field data and example calculations;
  - (12) Chain of custody information;
  - (13) Calibration documentation;
  - (14) Discussion of any abnormalities associated with the results; and
  - (15) A statement signed by the senior management official of the testing firm certifying the validity of the source test report. Test reports with material mistakes or misinformation may be rejected by SWCAA.
- b. **Test Results.** Test results must be reported in units of:
- (1) gr/dscf; and
  - (2) lb/hr.

**5. Changes to Testing Requirements:**

Emission testing 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.