



March 24, 2025

Tony Phillips
Northwest Paper Box Manufacturing
4275 NW Pacific Rim Blvd
Camas, WA 98607

RE: Final Air Discharge Permit for an Existing Box Manufacturing Facility

Dear Mr. Phillips:

A final determination to issue Air Discharge Permit (ADP) 25-3695 has been completed for ADP application CL-3235 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-3235 was published in the permit section of SWCAA's website on July 11, 2023. 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 25-3695 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 25-3695 may be appealed directly to the Pollution Control Hearings Board (PCHB) at P.O. Box 40903, Olympia, Washington 98504-0903 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 25-3695





SWCAA
Southwest Clean Air Agency

**AIR DISCHARGE PERMIT
25-3695**

Issued: March 24, 2025

Northwest Paper Box Manufacturing
4275 NW Pacific Rim Blvd, Camas, WA 98607

SWCAA ID – 2779

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 Equipment/Measure
1	Four Press Lines	Low Emission Inks and Glues, Bailer System Baghouse (baghouse not used for printer slotter)
2	Three Die Cut Lines	Bailer System Baghouse for Eterna Die Cut line
3	Emergency Generator Engine	Ultralow Sulfur (≤ 15 ppm) Liquid Fuel

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.

This is the initial ADP for this facility.

Emission Limits

Req. No.	Emission Limits	Equipment/ Activity ID No.						
1.	<p>Combined emissions from printing and gluing operations must not exceed any of the following:</p> <table><tr><th>Pollutant</th><th>Emission Limit</th></tr><tr><td>Volatile Organic Compounds</td><td>1.10 tpy</td></tr><tr><td>Toxic Air Pollutants</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.</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, glues, and solvent purchases and beginning inventory, returns, ending inventory, and waste shipped off-site.</p>	Pollutant	Emission Limit	Volatile Organic Compounds	1.10 tpy	Toxic Air Pollutants	Limited to SQER for each pollutant. Combined TAPs (not including acetone or other non-VOC TAPs) must not exceed the VOC emission limit.	Facility-wide
Pollutant	Emission Limit							
Volatile Organic Compounds	1.10 tpy							
Toxic Air Pollutants	Limited to SQER for each pollutant. Combined TAPs (not including acetone or other non-VOC TAPs) must not exceed the VOC emission limit.							

Req. No.	Emission Limits	Equipment/ Activity ID No.									
2.	<p>Emissions from the Bailer System Baghouse must not exceed the following:</p> <table> <tr> <th>Pollutant</th><th colspan="2">Emission Limit</th></tr> <tr> <td>Particulate Matter, PM/PM₁₀, total</td><td>1.07 lb/hr</td><td>4.69 tpy</td></tr> <tr> <td>Particulate Matter, PM_{2.5}, total</td><td>0.57 lb/hr</td><td>2.49 tpy</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>	Pollutant	Emission Limit		Particulate Matter, PM/PM ₁₀ , total	1.07 lb/hr	4.69 tpy	Particulate Matter, PM _{2.5} , total	0.57 lb/hr	2.49 tpy	2
Pollutant	Emission Limit										
Particulate Matter, PM/PM ₁₀ , total	1.07 lb/hr	4.69 tpy									
Particulate Matter, PM _{2.5} , total	0.57 lb/hr	2.49 tpy									
3.	Visible emissions from the printing and gluing operation and Bailer System Baghouse 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.	1 – 2									
4.	<p>Visible emissions from the emergency generator engine must not exceed the following for more than three (3) minutes in any one-hour period as determined in accordance with SWCAA Method 9:</p> <p>(a) Twenty percent (20%) during start-up; and</p> <p>(b) Five percent (5%) at all other times.</p> <p>The start-up period is defined as the first twenty (20) minutes of operation from a cold start.</p>	3									

Operating Limits and Requirements

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
5.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
6.	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
7.	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 – 3
8.	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 – 2

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
9.	The baghouse exhaust 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.	2
10.	A differential pressure gauge must be installed and maintained to measure the pressure drop across the baghouse bags.	2
11.	A sufficient quantity of replacement baghouse bags must be kept on site and readily available. Replacements of baghouse bags must be performed at the manufacturer's specified intervals or more frequent, as necessary.	2
12.	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, transfer, or disposal of VOC containing materials are prohibited. In addition, all VOC containing materials used to clean and/or flush spray equipment or lines during clean up must be collected and stored in a closed container.	Facility-wide
13.	The use of printing inks containing lead or hexavalent chromium is prohibited.	1
14.	The emergency generator engine must only be fired on fuel oil with a maximum sulfur content of 15 ppmw. Any fuel other than ultra-low sulfur fuel oil must be approved by SWCAA in writing prior to use.	3
15.	The emergency generator engine must be equipped with a non-resettable hour meter to record hours of operation.	3
16.	Operation of the emergency generator engine for maintenance checks and readiness testing must not exceed 100 hours per year. Emergency operation of the emergency engines is not limited.	3

Monitoring and Recordkeeping Requirements

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
17.	With the exception of 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.	Facility-wide
18.	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
19.	Excess emissions and upset conditions must be recorded for each occurrence.	Facility-wide
20.	For each product used 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.	Facility-wide

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
21.	<p>Operation of the printing and gluing operations must be monitored and recorded as follows:</p> <p>(a) Types and quantities of evaporative substances used and SDS information for these substances. Purchase receipts must be used to determine compliance. Recorded monthly</p> <p>(b) Amounts and types of hazardous waste disposed Recorded monthly</p> <p>(c) Maintenance/repair activities Recorded for each occurrence</p>	1
22.	<p>Operation of the baghouse must be monitored and recorded as follows:</p> <p>(a) Baghouse differential pressure Recorded weekly</p> <p>(b) Hours of operation Recorded monthly</p> <p>(c) Filter bag replacement Recorded for each occurrence</p> <p>(d) Maintenance and repair activities Recorded for each occurrence</p>	2
23.	<p>Operation of the emergency generator must be recorded as follows:</p> <p>(a) Hours of operation Recorded annually</p> <p>(b) Maintenance and repair activities Recorded for each occurrence</p>	3

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.
24.	Upset conditions must be reported to SWCAA as soon as possible after discovery. Outside of normal business hours, upset conditions may be reported by email, fax, or leaving a telephone message with SWCAA.	Facility-wide
25.	<p>Excess emissions must be reported to SWCAA as follows:</p> <p>(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;</p> <p>(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</p> <p>(c) No later than thirty (30) calendar days after the end of the month of discovery for all other excess emissions.</p>	Facility-wide
26.	Deviations from permit conditions must be reported no later than 30 days after the end of the month during which the deviation is discovered.	Facility-wide

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
27.	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
28.	<p>A written report must be submitted to SWCAA at least seven (7) business 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"> (a) A description of the type of product (e.g., ink, solvent, etc.), 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. <p>If the new product would cause any emission limit 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> <p>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.</p>	Facility-wide
29.	<p>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:</p> <ul style="list-style-type: none"> (a) The annual sum of emissions of NO_x, CO, VOC, PM, PM₁₀, PM_{2.5}, SO₂, TAPs, and HAPs; (b) The quantity of each product (gallons or pounds) containing VOCs or TAPs; (c) The quantity and type of hazardous waste disposed; (d) The number of hours that the baghouse operated; and (e) The number of hours that emergency generator engine operated. 	1 – 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.
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.