



April 16, 2025

Mr. Mike Smothers, EH&S  
Burton Mill Solutions  
1981 Shurman Way  
Woodland, WA 98674

Subject: Final Air Discharge Permit for New Saw Blade Manufacturing Facility

Dear Mr. Smothers:

A final determination to issue Air Discharge Permit 25-3704 (ADP 25-3704) has been completed for Air Discharge Permit (ADP) Application CO-1115 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 CO-1115 was published in the permit section of SWCAA's internet website on March 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 25-3704 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 25-3704 and Technical Support Document





**AIR DISCHARGE PERMIT  
25-3704**

**Issued: April 16, 2025**

**Burton Mill Solutions - Woodland  
1627 Guild Road, Woodland, WA 98674**

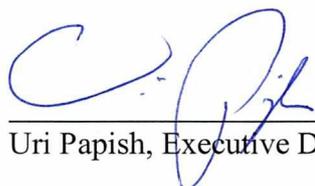
**SWCAA ID - 2826**



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	Laser Cutting (4 Machines)	Process Enclosure, Dust Collector (Torit / DFT3-24), HEPA Filters
2	Metal Grinding (9 Stations)	Process Enclosure, Dust Collector (Torit / DF2-8), HEPA Filters
3	Heat Treat Oven (0.50 MMBtu/hr)	Low Sulfur Fuel (Natural Gas)

## 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 Laser Cutting dust collection system 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>PM</td> <td>0.002 gr/dscf (1-hour average)</td> </tr> <tr> <td>PM<sub>10</sub></td> <td>0.38 tpy</td> </tr> </tbody> </table> <p>Annual emissions must be calculated based on actual hours of operation consistent with the methodology in Section 6 of the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM	0.002 gr/dscf (1-hour average)	PM <sub>10</sub>	0.38 tpy	1
<u>Pollutant</u>	<u>Emission Limit</u>							
PM	0.002 gr/dscf (1-hour average)							
PM <sub>10</sub>	0.38 tpy							
2.	<p>Emissions from the Metal Grinding dust collection system 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>PM</td> <td>0.002 gr/dscf (1-hour average)</td> </tr> <tr> <td>PM<sub>10</sub></td> <td>0.19 tpy</td> </tr> </tbody> </table> <p>Annual emissions must be calculated based on actual hours of operation consistent with the methodology in Section 6 of the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM	0.002 gr/dscf (1-hour average)	PM <sub>10</sub>	0.19 tpy	2
<u>Pollutant</u>	<u>Emission Limit</u>							
PM	0.002 gr/dscf (1-hour average)							
PM <sub>10</sub>	0.19 tpy							

<b>Req. No.</b>	<b>Emission Limits</b>	<b>Equipment/ Activity ID No.</b>								
3.	<p>Emissions from the Heat Treat Oven must not exceed:</p> <table border="0"> <tr> <td><u>Pollutant</u></td> <td><u>Emission Limit</u></td> </tr> <tr> <td>NO<sub>x</sub></td> <td>0.21 tpy</td> </tr> <tr> <td>CO</td> <td>0.18 tpy</td> </tr> <tr> <td>PM<sub>10</sub></td> <td>0.02 tpy</td> </tr> </table> <p>Annual emissions must be determined from actual fuel consumption consistent with the methodology in Section 6 of the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO <sub>x</sub>	0.21 tpy	CO	0.18 tpy	PM <sub>10</sub>	0.02 tpy	3
<u>Pollutant</u>	<u>Emission Limit</u>									
NO <sub>x</sub>	0.21 tpy									
CO	0.18 tpy									
PM <sub>10</sub>	0.02 tpy									
4.	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).	1-3								

### Operating Limits and Requirements

<b>Req. No.</b>	<b>Operating Limits and Requirements</b>	<b>Equipment/ Activity ID No.</b>
5.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
6.	The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facility-wide
7.	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.	1-3
8.	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.	1-3
9.	All laser cutting machines must be fully enclosed and vented to the Laser Cutting dust collection system.	1
10.	The Laser Cutting dust collection system must be exhausted through the Laser Cutting dust collector and high efficiency particulate air (HEPA) filters configured in series. HEPA filters are filters designed to remove at least 99.97 percent of airborne particles measuring 0.3 micrometers.	1
11.	All metal grinding stations must be vented to the Metal Grinding dust collection system.	2
12.	The Heat Treat Oven must be fired on natural gas only.	3
13.	Heat Treat Oven exhaust must be discharged vertically into the ambient air. Any device that obstructs or prevents vertical discharge is prohibited.	3

**Monitoring and Recordkeeping Requirements**

<b>Req. No.</b>	<b>Monitoring and Recordkeeping Requirements</b>	<b>Equipment/ Activity ID No.</b>
14.	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
15.	With the exception of data logged by an automated computer 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 for which a parameter record (for example pressure drop) is otherwise required, such non-operation must be reflected in the record.	Facility-wide
16.	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.	1-3
17.	Excess emissions and upset conditions must be recorded for each occurrence.	1-3
18.	The following information must be collected, recorded at the intervals specified below, and readily available on-site for inspection: (a) Combined hours of Laser Cutter operation      Recorded monthly (b) Hours of operation for the Laser Cutting dust collection system      Recorded monthly (c) Hours of operation for the Metal Grinding dust collection system      Recorded monthly (d) Quantity of natural gas consumed by the Heat Treat Oven      Recorded annually (e) Dust collector filter changes      Recorded for each occurrence (f) Maintenance and repair activities with the potential to affect emissions      Recorded for each occurrence	1-3

**Emission Monitoring and Testing Requirements**

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

**Reporting Requirements**

<b>Req. No.</b>	<b>Reporting Requirements</b>	<b>Equipment/ Activity ID No.</b>
19.	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

<b>Req. No.</b>	<b>Reporting Requirements</b>	<b>Equipment/ Activity ID No.</b>
20.	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.	Facility-wide
21.	The following emission-related information must be reported to SWCAA by March 15 <sup>th</sup> for the previous calendar year: (a) Combined hours of Laser Cutter operation; (b) Hours of operation for each dust collection system; (c) Quantity of natural gas consumed by the Heat Treat Oven; and (d) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs).	1-3
22.	Initial start-up of SWCAA approved emission units must be reported to SWCAA in writing within 10 days of commencing regular operation.	1-3

### 3. General Provisions

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

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