TECHNICAL SUPPORT DOCUMENT

Air Discharge Permit ADP 25-3704
Air Discharge Permit Application CO-1115

Issued: April 16, 2025

Burton Mill Solutions – Woodland

SWCAA ID - 2826

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Southwest Clean Air Agency

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ABBREVIATIONS

List of Acronyms

ADP	Air Discharge Permit
AP-42	Compilation of Emission Factors, AP-42, 5th Edition, Volume 1, Stationary Point and Area Sources – published by EPA
ASIL	Acceptable Source Impact Level
BACT	Best available control technology
CAM	Compliance Assurance Monitoring
CAS#	Chemical Abstracts Service registry number
CFR	Code of Federal Regulations
EPA	U.S. Environmental Protection Agency
EU	Emission Unit
NOV	Notice of Violation/
NSPS	New Source Performance Standard
PSD	Prevention of Significant Deterioration
RCW	Revised Code of Washington
SCC	Source Classification Code
SDS	Safety Data Sheet
SQER	Small Quantity Emission Rate listed in WAC 173-460
Standard	Standard conditions at a temperature of 68°F (20°C) and a pressure of 29.92 in Hg (760 mm Hg)
SWCAA	Southwest Clean Air Agency
T-BACT	Best Available Control Technology for toxic air pollutants
WAC	Washington Administrative Code

List of Units and Measures

µg/m³	Micrograms per cubic meter
acfm	Actual cubic foot per minute
dscfm	Dry Standard cubic foot per minute
g/dscm	Grams per dry Standard cubic meter
gr/dscf	Grain per dry standard cubic foot
MMBtu	Million British thermal unit
ppm	Parts per million
ppmv	Parts per million by volume
ppmvd	Parts per million by volume, dry
ppmw	Parts per million by weight
scfm	Standard cubic foot per minute
tpy	Tons per year

List of Chemical Symbols, Formulas, and Pollutants

CO	Carbon monoxide
CO_2	Carbon dioxide
CO_2e	Carbon dioxide equivalent
HAP	Hazardous air pollutant listed pursuant to Section 112 of the Federal Clean Air Act
NO_x	Nitrogen oxides
O_2	Oxygen
O_3	Ozone
PM	Particulate Matter with an aerodynamic diameter 100 µm or less
PM_{10}	PM with an aerodynamic diameter 10 µm or less
$PM_{2.5}$	PM with an aerodynamic diameter 2.5 µm or less
SO_2	Sulfur dioxide
SO_x	Sulfur oxides
TAP	Toxic air pollutant pursuant to Chapter 173-460 WAC
VOC	Volatile organic compound

Terms not otherwise defined have the meaning assigned to them in the referenced regulations or the dictionary definition, as appropriate.

1. FACILITY IDENTIFICATION

Applicant Name:	Simons International, LLC
Applicant Address:	1981 Shurman Way, Woodland, WA 98674
Facility Name:	Burton Mill Solutions - Woodland
Facility Address:	1627 Guild Road, Woodland, WA 98674
SWCAA Identification:	2826
Contact Person:	Mike Smothers, EH&S
Primary Process:	Saw Blade Manufacturing
SIC/NAICS Code:	3425 / Saw Blades and Handsaws 332216 / Saw Blade and Handtool Manufacturing
Facility Latitude and Longitude	45° 54' 54.86" N 122°41'25.6"W
Facility Classification:	Natural Minor

2. FACILITY DESCRIPTION

Simonds International, LLC (Simonds) operates a metal fabrication facility that produces bandsaw blades, machine knives, circular saw blades, and handsaws. Facility operations include metal cleaning, laser cutting, welding, milling and grinding, abrasive blasting, and spray coating of various metal parts. Simonds currently operates at 5504 South 11th Street in Ridgefield, Washington under the provisions of Air Discharge Permit 22-3545. Simonds is ceasing operations at the Ridgefield location and moving some of the manufacturing operations (milling, grinding, heat treatment) to a new facility at 1627 Guild Road in Woodland, Washington. The new facility will do business as Burton Mill Solutions – Woodland.

3. CURRENT PERMITTING ACTION

This permitting action is in response to Air Discharge Permit application number CO-1115 (ADP Application CO-1115) dated March 26, 2025. Simonds submitted ADP Application CO-1115 requesting approval of the following:

- Installation of (4) laser cutting machines;
- Installation of (8) milling stations;
- Installation of (9) grinding stations; and
- Installation of (1) natural gas-fired heat treat oven.

The current permitting action provides approval for relocated operations as proposed in ADP Application CO-1115. This is the initial permitting for the Woodland Facility. Operations in Ridgefield will cease once the Woodland facility begins regular operation. ADP 22-3545 will then become obsolete.

4. PROCESS DESCRIPTION

4.a. Saw Blade Production (*new*). Raw steel coil is received from offsite and cut to shape using laser cutters. Laser cutting operations are vented to a cartridge-style dust collector through a central collection system. The laser cutting dust collector is equipped with secondary HEPA filters and discharges back into the process building. Cut saw blades are processed with milling and grinding machines. Milling produces negligible dust. Emissions from grinding operations are vented to a cartridge-style filter system through a central collection system. The grinding dust collector is equipped with secondary HEPA filters and discharges back into the process building. Finished saw blades are heat treated in a gas-fired oven prior to packaging.

5. EQUIPMENT/ACTIVITY IDENTIFICATION

5.a. Laser Cutting (*new*). (4) laser cutting machines are used to cut steel coil to desired shapes. Each cutting area is fully enclosed and vented to the Laser Cutting dust collection system. (3) of the cutting machines were manufactured by Amada. (1) of the cutting machines was manufactured by BesCutter.

Laser Cutting Dust Collector

Make / Model:	Torit / DFT3-24 (s/n IG625261-001)
Rated Airflow:	5,000 cfm
Cleaning Method:	Pulsed Jet
Primary Filter:	(24) nanofiber cartridges manufactured by Clean Air Technologies, rated at MERV 15 per ASHRAE Method 52.2
Secondary Filter:	HEPA polishing filter
Unit Location:	Outside on the south side of process building
Exhaust:	Discharges inside process building
Location:	45° 54' 54.86" N 122° 46' 04.74"W

ADP Application CO-1115. Simonds proposes to relocate three of the existing laser cutting machines from the Ridgefield facility to the Woodland facility. The remaining cutting machines will be taken out of service. A fourth laser cutting machine from out of state will be installed separately at the Woodland facility.

5.b. Metal Grinding (*new*). (9) grinding stations are used to grind cut saw blades. Each grinding station is equipped with a ventilation pickup connected to the Metal Grinding dust collection system.

Metal Grinding Dust Collector

Make / Model:	Torit / DF2-8 (s/n 10303171-1)
Rated Airflow:	2,500 cfm
Cleaning Method:	Pulsed Jet
Primary Filter:	(24) nanofiber cartridges manufactured by Clean Air Technologies, rated at MERV 15 per ASHRAE Method 52.2
Secondary Filter:	HEPA polishing filter
Unit Location:	Outside on the south side of process building
Exhaust:	Discharges inside process building
Location:	45° 54' 54.86" N 122° 46' 04.74"W

ADP Application CO-1115. Simonds proposes to relocate all of the existing metal grinding stations from the Ridgefield facility to the Woodland facility. The configuration of the metal grinding stations will not be changed.

5.c. Heat Treat Oven (*new*). One natural gas-fired oven used to heat treat saw blades. The oven is described as follows:

Make / Model:	Pacific Saw and Blade (s/n 120640)
Rated Heat Input:	0.50 MMBtu/hr
Fuel:	Natural gas
Capacity:	16" high stack of 36" dia blades
Exhaust:	6" dia, vertical
Location:	45° 54' 55.25" N 122° 46' 04.04" W

ADP Application CO-1115. Simonds proposes to relocate one of the existing gas-fired heat treat ovens from the Ridgefield facility to the Woodland facility. The oven will not be physically modified. The oven exhaust stack will be configured to discharge vertically.

Other Equipment

5.d. Space Heaters. Natural gas-fired space heaters will be used for comfort heating. Specific equipment information is listed below:

Make / Model	Heat Input Capacity (MMBtu/hr)
Furnace #1	0.080
Furnace #2	0.040

5.e. Milling. Eight custom milling machines are used in place of grinding on blades. This equipment "peels" the metal and does not generate significant dust.

5.f. Abrasive Blasting. Small amounts of abrasive blasting may be conducted in a fully enclosed "glove box" vented within the building.

5.g. Electronics Assembly. No significant emissions are expected from electronics assembly.

5.h. Equipment/Activity Summary.

ID No.	Equipment/Activity	Control Equipment/Measure
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)
3	Heat Treat Oven (0.50 MMBtu/hr)	Low Sulfur Fuel (Natural Gas)

6. EMISSIONS DETERMINATION

Emissions to the ambient atmosphere from manufacturing operations proposed in ADP Application CO-1115 consist of nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), particulate matter (PM), sulfur dioxide (SO_2), toxic air pollutants (TAPs), and hazardous air pollutants (HAPs).

Unless otherwise specified by SWCAA, actual emissions must be determined using the specified input parameter listed for each emission unit and the following hierarchy of methodologies:

(a) Continuous emissions monitoring system (CEMS) data;
(b) Source emissions test data (EPA reference method). When source emissions test data conflicts with CEMS data for the time period of a source test, source test data must be used;
(c) Source emissions test data (other test method); and
(d) Emission factors or methodology provided in this TSD.

6.a. Laser Cutting (*new*). Potential emissions from laser cutting operations are calculated based on the following assumptions:

(1) A total of 4 laser cutters each operating 8,760 hours per year (35,040 combined operating hours);
(2) NO_X and ozone emission factors from "Secondary Hazards of High Power Laser Beam Welding" K. Schulmeister et. Al;
(3) Estimated metal removal rate provided by applicant;
(4) The highest estimated metal removal rate for each laser cutter;
(5) 5% of metal removed during cutting becomes fume ("Emissions of Fume, Nitrogen Oxides and Noise in Plasma Cutting of Stainless and Mild Steel" Bromeen B. et al March 1994);
(6) The concentration of metal HAP in cutting generated fume (Ni, Mn, Cr) is directly proportional to the concentration of the metal HAP in the base metal;
(7) 6.47% of total chromium emissions are hexavalent chromium ("Development of Emission Inventory for Metal Welding, Cutting and Spraying Operations" SCAQMD May 2000); and
(8) $PM_{10}/PM_{2.5}$ emissions are assumed equivalent to 0.002 gr/dscf (a practically quantifiable level) rather than calculated from the relatively uncertain, and in practical terms unmeasurable, fume generation rate. This also accounts for the possibility of particulate other than metal fume in the exhaust.

Annual emissions will be calculated from actual hours of operation using the same methodology.

Laser Cutting - Metal Removal Rate

Metal Density =		7 grams/cm^3		
Tool	Width (in)	Depth (in)	5" Cut Time (sec)	Amount Removed (lb/hr)
Bescutter	0.018	0.109	30	0.30
Amada - A1 WB	0.015	0.078	55	0.10
Amada - A2 WB	0.018	0.078	55	0.12
Amada - A3 WB	0.019	0.078	36	0.19
			Total =	0.70

Laser Cutting - Emissions

Combined Cutting Hours =	35,040	hours per year (8,760 hours per laser cutter)
Max Metal Removal Rate =	0.70	pounds per hour (combined)
Avg Metal Rate Per Machine =	0.175	pounds per hour (combined)
# of Laser Cutters =	4	
% of Metal Converted to Fume	5%	Dry cutting of mild steel - Bromeen et. al paper
Maximum Ni Content =	5%	From Safety Data Sheet
Maximum Mn Content =	2.5%	From Safety Data Sheet
Maximum Cr Content =	5%	From Safety Data Sheet
% of Total Cr Emitted as Cr^{+6} =	6%	Worst-case scenario
Particulate Control Efficiency =	99.9955%	Estimated combined capture and control efficiency

Pollutant	Uncontrolled Avg Emissions (lb/hr/machine)	Max Controlled Emissions (lb/hr)	Annual Emissions (lb/yr)	Uncontrolled Emission Factor Source
NO_X	0.0070	0.028	244.7	0.88 mg/s - "Secondary Hazards of High Power Laser Beam Welding", K. Schulmeister et. Al
$PM_{10}/PM_{2.5}$	0.00875	1.6E-06	0.014	"Emissions of Fume, Nitrogen Oxides and Noise in Plasma Cutting of Stainless and Mild Steel" Bromeen B. et al March 1994
O_3	0.0017	0.007	58.4	0.21 mg/s - "Secondary Hazards of High Power Laser Beam Welding", K. Schulmeister et. Al
Ni as Ni	0.00044	7.9E-08	6.9E-04	Fume * % Ni
Mn as Mn	0.00022	3.9E-08	3.4E-04	Fume * % Mn
Cr as Cr	0.00044	7.9E-08	6.9E-04	Fume * % Cr
Cr^{+6} as Cr	0.000028	5.1E-09	4.5E-05	Cr * % Converted to Cr^{+6}

Source	Exhaust Flow (cfm)	Emission Concentration (gr/dscf)	Annual Operation (hours)	$PM/PM_{10}/PM_{2.5}$ lb/hr	lb/yr
Laser Cutting Dust Collector	5,000	0.002	8,760	0.086	751

6.b. Metal Grinding (*new*). Potential emissions from grinding operations are calculated assuming complete capture of emissions by the central collection system, 8,760 hours per year or operations, and an exhaust concentration of 0.002 gr/dscf. Annual emissions will be calculated from actual hours of operation using the same methodology.

Source	Exhaust Flow (cfm)	Emission Concentration (gr/dscf)	Annual Operation (hours)	$PM/PM_{10}/PM_{2.5}$ lb/hr	lb/yr
Grinding Dust Collector	2,500	0.002	8,760	0.043	375

6.c. Heat Treat Oven (*new*). Potential emissions from oven operation are calculated from combined heat input of 0.50 MMBtu/hr, 8,760 hr/yr, and emission factors from EPA AP-42 Section 1.4 "Natural Gas Combustion" (3/98). All PM is assumed to be $PM_{2.5}$. Annual emissions will be calculated based on actual fuel consumption using the same methodology.

Heat Input Rating =	0.500	MMBtu/hr		
Gas Heat Content =	1,020	Btu/scf		
Fuel Consumption =	4,380	MMBtu/yr		
	Emission Factor		Emissions	
Pollutant	(lb/MMBtu)	(lb/hr)	(lb/yr)	(tpy)
NO_X	0.0980	0.05	429	0.21
CO	0.0824	0.04	361	0.18
VOC	0.0054	0.003	24	0.01
SO_X as SO_2	5.88E-04	2.9E-04	3	0.001
PM (total)	0.0075	0.004	33	0.02
PM_{10}	0.0075	0.004	33	0.02
$PM_{2.5}$	0.0075	0.004	33	0.02
Benzene	2.06E-06	1.0E-06	9.0E-03	4.5E-06
Formaldehyde	7.35E-05	3.7E-05	3.2E-01	1.6E-04
CO_2e	117.1	58.5	512,889	256.4

6.d. Emissions Summary/Facility-wide Potential to Emit. Facility-wide potential to emit as calculated in the sections above is summarized below.

Pollutant	Potential Emissions (tpy)	Project Increase (tpy)
NO_X	0.34	0.34
CO	0.18	0.18
VOC	0.012	0.012
SO_2	0.0013	0.0013
Lead	0.0	0.0
PM	0.58	0.58
PM_{10}	0.58	0.58
$PM_{2.5}$	0.58	0.58
TAP	0.0002	0.0002
HAP	0.0002	0.0002
CO_2e	256	256

Pollutant	CAS Number	Category	Facility-wide Emissions	Project Increase	WAC 173-460 SQER
			(lb/yr)	(lb/yr)	(lb/yr)
Benzene	71-43-2	HAP/TAP A	0.009	0.009	20
Chromium (VI)	--	HAP/TAP A	4.5E-5	4.5E-5	6.5E-4
Formaldehyde	50-00-0	HAP/TAP A	0.32	0.32	20
Nickel	7440-02-0	HAP/TAP A	6.9E-4	6.9E-4	0.5
			(lb/24-hr)	(lb/24-hr)	(lb/24-hr)
Chromium (total)	7440-47-3	HAP/TAP B	1.9E-6	1.9E-6	0.37
Manganese	--	HAP/TAP B	9.4E-7	9.4E-7	0.022

7. REGULATIONS AND EMISSION STANDARDS

Regulations that have been used to evaluate the acceptability of the proposed facility and establish emission limits and control requirements include, but are not limited to, the regulations, codes, or requirements listed below.

7.a. Title 40 Code of Federal Regulations Part 63 (40 CFR 63) Subpart XXXXXX "National Emissions Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories" establishes standards and work practices for dry abrasive blasting, machining, dry grinding and polishing, spray painting, and welding operations at area sources primarily engaged in one of nine selected metal fabrication and finishing source categories. This facility is an area source that manufactures saw blades (NAICS code 332216) and is not in one of the categories subject to this regulation. Therefore, this regulation is not applicable.

7.b. Revised Code of Washington (RCW) 70A.15.2040 empowers any activated air pollution control authority to prepare and develop a comprehensive plan or plans for the prevention, abatement and control of air pollution within its jurisdiction. An air pollution control authority may issue such orders as may be necessary to effectuate the purposes of the Washington Clean Air Act and enforce the same by all appropriate administrative and judicial proceedings subject to the rights of appeal as provided in Chapter 62, Laws of 1970 ex. sess.

7.c. RCW 70A.15.2210 provides for the inclusion of conditions of operation as are reasonably necessary to assure the maintenance of compliance with the applicable ordinances, resolutions, rules and regulations when issuing an Air Discharge Permit for installation and establishment of an air contaminant source.

7.d. Washington Administrative Code (WAC) 173-460 "Controls for New Sources of Toxic Air Pollutants" requires Best Available Control Technology for toxic air pollutants (T-BACT), identification and quantification of emissions of toxic air pollutants and demonstration of protection of human health and safety.

7.e. WAC 173-476 "Ambient Air Quality Standards" establishes ambient air quality standards for PM_{10}, $PM_{2.5}$, lead, sulfur dioxide, nitrogen dioxide, ozone, and carbon monoxide in the ambient air, which shall not be exceeded.

7.f. SWCAA 400-040 "General Standards for Maximum Emissions" requires all new and existing sources and emission units to meet certain performance standards with respect to Reasonably Available Control Technology (RACT), visible emissions, fallout, fugitive emissions, odors, emissions detrimental to persons or property, sulfur dioxide, concealment and masking, and fugitive dust.

7.g. SWCAA 400-050 "Emission Standards for Combustion and Incineration Units" requires that all provisions of SWCAA 400-040 be met and that no person shall cause or permit the emission of particulate matter from any combustion or incineration unit in excess of 0.23 grams per dry cubic meter (0.1 grains per dry standard cubic foot) of exhaust gas at standard conditions.

7.h. SWCAA 400-060 "Emission Standards for General Process Units" prohibits particulate matter emissions from all new and existing process units in excess of 0.1 grains per dry standard cubic foot of exhaust gas.

7.i. SWCAA 400-109 "Air Discharge Permit Applications" requires that an Air Discharge Permit application be submitted for all new installations, modifications, changes, or alterations to process and emission control equipment consistent with the definition of "new source". Sources wishing to modify existing permit terms may submit an Air Discharge Permit application to request such changes. An Air Discharge Permit must be issued, or written confirmation of exempt status must be received, before beginning any actual construction, or implementing any other modification, change, or alteration of existing equipment, processes, or permits.

7.j. SWCAA 400-110 "New Source Review" requires that SWCAA issue an Air Discharge Permit in response to an Air Discharge Permit application prior to establishment of the new source, emission unit, or modification.

7.k. SWCAA 400-113 "Requirements for New Sources in Attainment or Nonclassifiable Areas" requires that no approval to construct or alter an air contaminant source shall be granted unless it is evidenced that:

(1) The equipment or technology is designed and will be installed to operate without causing a violation of the applicable emission standards;
(2) Best Available Control Technology will be employed for all air contaminants to be emitted by the proposed equipment;
(3) The proposed equipment will not cause any ambient air quality standard to be exceeded; and
(4) If the proposed equipment or facility will emit any toxic air pollutant regulated under WAC 173-460, the proposed equipment and control measures will meet all the requirements of that Chapter.

8. RACT/BACT/BART/LAER/PSD/CAM DETERMINATIONS

The proposed equipment and control systems incorporate Best Available Control Technology (BACT) for the types and amounts of air contaminants emitted by the processes as described below:

8.a. BACT Determination – Laser Cutting. The proposed use of process enclosure and high efficiency filtration (MERV 15 cartridge-style filters with HEPA polishing filters) has been determined to meet the requirements of BACT for laser cutting operations at this facility. Venting the exhaust indoors further reduces the potential for significant emissions to the ambient air.

No cost-effective means of minimizing NO_X or ozone emissions have been identified and the quantity of emissions are relatively small and highly uncertain. Therefore, SWCAA has determined that no additional controls are appropriate to address potential NO_X or ozone emissions.

8.b. BACT Determination – Metal Grinding. The proposed use of process enclosure and high efficiency filtration (MERV 15 cartridge-style filters with HEPA polishing filters) has been determined to meet the requirements of BACT for metal grinding operations at this facility. Venting the exhaust indoors further reduces the potential for significant emissions to the ambient air.

8.c. BACT Determination – Heat Treat Oven. The proposed use of low sulfur fuel (natural gas) and proper combustion controls has been determined to meet the requirements of BACT for heat treat ovens at this facility.

Other Determinations

8.d. Prevention of Significant Deterioration (PSD) Applicability Determination. The potential to emit of this facility is less than applicable PSD applicability thresholds. Likewise, this permitting action will not result in a potential increase in emissions equal to or greater than the PSD thresholds. Therefore, PSD review is not applicable to this action.

8.e. Compliance Assurance Monitoring (CAM) Applicability Determination. CAM is not applicable to any emission unit at this facility because it is not a major source and is not required to obtain a Part 70 permit.

9. AMBIENT IMPACT ANALYSIS

9.a. Criteria Air Pollutant Review. Criteria pollutant emissions from approved operations are not expected to cause an adverse impact on ambient air quality.

9.b. TAP Small Quantity Review. The incremental increases in TAP emissions associated with this permitting action are quantified in Section 6 of this Technical Support Document. All incremental increases in individual TAP emissions are less than the applicable small quantity emission rate (SQER) identified in WAC 173-460.

Conclusions

9.c. Installation of a saw blade manufacturing facility, as proposed in ADP Application CO-1115, will not cause the ambient air quality requirements of Title 40 Code of Federal Regulations (CFR) Part 50 "National Primary and Secondary Ambient Air Quality Standards" to be violated.

9.d. Installation of a saw blade manufacturing facility, as proposed in ADP Application CO-1115, will not cause the requirements of WAC 173-460 "Controls for New Sources of Toxic Air Pollutants" or WAC 173-476 "Ambient Air Quality Standards" to be violated.

9.e. Installation of a saw blade manufacturing facility, as proposed in ADP Application CO-1115, will not cause a violation of emission standards for sources as established under SWCAA General Regulations Sections 400-040 "General Standards for Maximum Emissions," 400-050 "Emission Standards for Combustion and Incineration Units," and 400-060 "Emission Standards for General Process Units."

10. DISCUSSION OF APPROVAL CONDITIONS

SWCAA has made a determination to issue ADP 25-3704 in response to ADP Application CO-1115. ADP 25-3704 contains approval requirements deemed necessary to assure compliance with applicable regulations and emission standards as discussed below.

10.a. Previous Permits. Subsequent to establishment of operations at the new Woodland facility, Simonds International will cease all operations at the Ridgefield facility. ADP 22-3545 will become obsolete at that point.

10.b. General Basis. Permit requirements for equipment affected by this permitting action incorporate the operating schemes proposed by the applicant in ADP Application CO-1115. Permit requirements established by this action are intended to implement BACT, minimize emissions, and assure compliance with applicable requirements on a continuous basis. Emission limits for approved equipment are based on the maximum potential emissions calculated in Section 6 of this Technical Support Document.

10.c. Monitoring and Recordkeeping Requirements. ADP 25-3704 establishes monitoring and recordkeeping requirements sufficient to document compliance with applicable emission limits, ensure proper operation of approved equipment and provide for compliance with generally applicable requirements. Specific monitoring requirements are established for fuel consumption and hours of operation.

10.d. Reporting Requirements. ADP 25-3704 establishes general reporting requirements for annual air emissions, upset conditions and excess emissions. Specific reporting requirements are established for fuel consumption and hours of operation. Reports are to be submitted on an annual basis.

10.e Emission Limits. A zero percent opacity limit is established for all equipment at the facility because any visible emissions from any of these emission units would indicate that the unit or control equipment was malfunctioning and producing excess emissions.

10.f Operating Limits and Requirements. To minimize the impact of emissions on ambient air quality, the heat treat oven exhaust stack is required to exhaust vertically. This is good engineering practice and is required by SWCAA 400-200(1) for all new equipment.

HEPA level filtration is required for secondary filtration of Laser Cutting Dust Collector and Grinding Dust Collector because this level of filtration is necessary to address potential TAP emissions. This provides adequate assurance that the ambient impact of toxic air pollutants from approved operations will be below regulatory concern.

Grinding will not be a significant potential source of toxic air pollutants so the only restriction included in the permit was the prohibition from discharging to ambient air. If the unit is discharged to ambient air, additional monitoring and recordkeeping would apply.

11. START-UP AND SHUTDOWN/ALTERNATIVE OPERATING SCENARIOS/POLLUTION PREVENTION

11.a. Start-up and Shutdown Provisions. Pursuant to SWCAA 400-081 "Start-up and Shutdown", technology based emission standards and control technology determinations shall take into consideration the physical and operational ability of a source to comply with the applicable standards during start-up or shutdown.

Where it is determined that a source is not capable of achieving continuous compliance with an emission standard during start-up or shutdown, SWCAA shall include appropriate emission limitations, operating parameters, or other criteria to regulate performance of the source during start-up or shutdown.

The applicant did not identify any start-up and shutdown periods during which affected equipment is not capable of achieving continuous compliance with applicable technology determinations or approval conditions. To SWCAA's knowledge, this facility can comply with all applicable standards during startup and shutdown.

11.b. Alternate Operating Scenarios. SWCAA conducted a review of alternate operating scenarios applicable to equipment affected by this permitting action. The permittee did not propose or identify any applicable alternate operating scenarios. Therefore, none were included in the permit requirements.

11.c. Pollution Prevention Measures. SWCAA conducted a review of possible pollution prevention measures for the facility. No pollution prevention measures were identified by either the permittee or SWCAA separate from those measures required under BACT considerations. Therefore, none were included in the permit requirements.

12. EMISSION MONITORING AND TESTING

There are no formal emission monitoring or testing requirements for this facility.

13. FACILITY HISTORY

13.a. Previous Permitting Actions. SWCAA has not previously issued any Permits for this facility.

13.b. Compliance History. A search of source records on file at SWCAA did not identify any outstanding compliance issues at this facility.

14. PUBLIC INVOLVEMENT OPPORTUNITY

14.a. Public Notice for ADP Application CO-1115. Public notice for ADP Application CO-1115 was published on the SWCAA internet website for a minimum of (15) days beginning on March 27, 2025.

14.b. Public/Applicant Comment for ADP Application CO-1115. SWCAA did not receive specific comments, a comment period request or any other inquiry from the public regarding this ADP application. Therefore, no public comment period was provided for this permitting action.

14.c. State Environmental Policy Act. A complete SEPA checklist was submitted by Simonds in conjunction with ADP Application CO-1115. After reviewing the checklist, SWCAA has made a Determination of Nonsignificance (DNS 25-021) concurrent with issuance of ADP 25-3704.