



June 25, 2025

Mr. Samir Patel, VP of Development  
ePac Portland, LLC  
8233 Forsyth Street, Suite 116  
Middleton, WI 53562

Subject: Final Air Discharge Permit for New Digital Printing Press

Dear Mr. Patel:

A final determination to issue Air Discharge Permit 25-3710 (ADP 25-3710) has been completed for Air Discharge Permit (ADP) Application CL-3298 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-3298 was published in the permit section of SWCAA's internet website on May 2, 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 25-3710 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 25-3710 and Technical Support Document





**SWCAA**  
Southwest Clean Air Agency

**AIR DISCHARGE PERMIT  
25-3710**

**Issued: June 25, 2025**

**ePac Portland, LLC  
18110 SE 34th Street  
Vancouver, WA 98683**

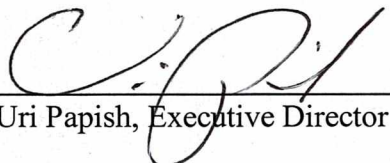
**SWCAA ID - 2733**



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	Digital Printing Press 1 (Hewlett Packard Indigo 20000)	Low Volatility Inks, Internal Vapor Recovery, Ozone Decomposer
2	Digital Printing Press 2 (Hewlett Packard Indigo 20000)	Low Volatility Inks, Internal Vapor Recovery, Ozone Decomposer
3	Digital Printing Press 3 (Hewlett Packard Indigo 25000)	Low Volatility Inks, Internal Vapor Recovery, Ozone Decomposer
4	Laminator (Nordmeccanica Super Simplex L1100)	Ozone Decomposer

## 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 25-3710 supersedes ADP 21-3496 in its entirety.

### Emission Limits

Req. No.	Emission Limits	Equipment/ Activity ID No.				
1.	<p>Combined emissions from printing operations must not exceed:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>VOC</td><td>11.68 tpy</td></tr></table> <p>Annual emissions must be determined from actual ink consumption consistent with the methodology in Section 6 of the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	VOC	11.68 tpy	1-3
<u>Pollutant</u>	<u>Emission Limit</u>					
VOC	11.68 tpy					
2.	<p>Combined emissions from corona treater operation must not exceed the following:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>Ozone</td><td>0.13 tpy</td></tr></table> <p>Annual emission must be determined from actual hours of operation and estimated destruction efficiency consistent with the methodology in Section 6 of the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	Ozone	0.13 tpy	1-4
<u>Pollutant</u>	<u>Emission Limit</u>					
Ozone	0.13 tpy					
3.	<p>MDI emissions from Laminator operation must not exceed 0.17 lb/yr.</p> <p>Annual emissions must be determined from actual laminator production consistent with the methodology in Section 6 of the Technical Support Document for this Permit.</p>	4				

<b>Req. No.</b>	<b>Emission Limits</b>	<b>Equipment/ Activity ID No.</b>
4.	Visible emissions from approved equipment must not exceed 0% opacity for more than three minutes in any one-hour period as determined by a Certified Observer certified in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).	1-4

**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.	1-4
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.	1-4
9.	Ozone decomposer units must be operated at all times when the associated corona treaters are in operation.	1-4
10.	The permittee must take corrective action if emission monitoring results or other operation data indicate ozone decomposer units are not maintaining a minimum ozone destruction efficiency of 99%. Corrective action must be pursued until observed emission concentrations no longer exceed permitted emission limits.	1-4
11.	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 printing equipment during clean up must be collected and stored in a closed container	1-3
12.	Exhaust air from approved equipment must be discharged vertically into the ambient air. Any device that obstructs or prevents vertical discharge is prohibited.	1-4

**Monitoring and Recordkeeping Requirements**

<b>Req. No.</b>	<b>Monitoring and Recordkeeping Requirements</b>	<b>Equipment/ Activity ID No.</b>
13.	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

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.										
14.	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.	1-4										
15.	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.	1-4										
16.	Excess emissions and upset conditions must be recorded for each occurrence.	1-4										
17.	<div>The following information must be collected, recorded at the intervals specified below, and maintained readily available on-site for inspection:</div> <table><tr><td>(a) Quantity of ink and imaging oil consumed</td><td>Recorded monthly</td></tr><tr><td>(b) Quantity of Laminator production</td><td>Recorded monthly</td></tr><tr><td>(c) Hours of operation for each corona treater</td><td>Recorded monthly</td></tr><tr><td>(d) Maintenance and repair activities that may affect air emissions</td><td>Recorded for each occurrence</td></tr><tr><td>(e) SDS information for printing materials</td><td>Maintain material information as necessary to calculate annual emissions and demonstrate compliance with Permit conditions.</td></tr></table>	(a) Quantity of ink and imaging oil consumed	Recorded monthly	(b) Quantity of Laminator production	Recorded monthly	(c) Hours of operation for each corona treater	Recorded monthly	(d) Maintenance and repair activities that may affect air emissions	Recorded for each occurrence	(e) SDS information for printing materials	Maintain material information as necessary to calculate annual emissions and demonstrate compliance with Permit conditions.	1-4
(a) Quantity of ink and imaging oil consumed	Recorded monthly											
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(c) Hours of operation for each corona treater	Recorded monthly											
(d) Maintenance and repair activities that may affect air emissions	Recorded for each occurrence											
(e) SDS information for printing materials	Maintain material information as necessary to calculate annual emissions and demonstrate compliance with Permit conditions.											

#### Emission Monitoring and Testing Requirements

<b>Req. No.</b>	<b>Emission Monitoring and Testing Requirements</b>	<b>Equipment/ Activity ID No.</b>
18.	The permittee must conduct initial and periodic emission monitoring of each ozone decomposer as described in Appendix A of this Permit.	1-4

#### Reporting Requirements

<b>Req. No.</b>	<b>Reporting Requirements</b>	<b>Equipment/ Activity ID No.</b>
19.	<p>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:</p> <p>(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).</p>	Facility-wide

<b>Req. No.</b>	<b>Reporting Requirements</b>	<b>Equipment/ Activity ID No.</b>
20.	<p>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:</p> <ul style="list-style-type: none"> <li>(a) A description of the product (e.g., resin, paint, solvent, etc.), Safety Data Sheet information, and the location where the product will be used;</li> <li>(b) The date by which the Permittee intends to begin use of the product;</li> <li>(c) The amount of product expected to be used;</li> <li>(d) A quantification of the change in VOC, HAP and TAP emissions from use of the product; and</li> <li>(e) A summary of any applicable requirement that would apply as a result of using the product.</li> </ul> <p>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. Any new product that is only to be used for testing purposes with a quantity of 5 gallons or less of usage does not need to be reported to SWCAA prior to use.</p>	Facility-wide
21.	<p>Excess emissions must be reported to SWCAA as follows:</p> <ul style="list-style-type: none"> <li>(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;</li> <li>(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</li> <li>(c) No later than 30 days after the end of the month of discovery for all other excess emissions.</li> </ul>	Facility-wide
22.	Emission monitoring results must be reported to SWCAA in writing within 15 days of completion.	1-4
23.	Initial start-up of approved emission units must be reported to SWCAA in writing within 10 days of commencing regular operation.	1-4
24.	<p>The following emission-related information must be reported to SWCAA by March 15th for the previous calendar year:</p> <ul style="list-style-type: none"> <li>(a) Quantity of ink and imaging oil consumed;</li> <li>(b) Quantity of Laminator production;</li> <li>(c) Hours of operation for each corona treater; and</li> <li>(d) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs).</li> </ul>	1-4

### 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.



## **Appendix A**

### **Emission Monitoring Requirements**

### **Ozone Decomposers**

#### **1. Introduction:**

The purpose of periodically monitoring ozone decomposer destruction efficiency is to minimize emissions and provide a reasonable assurance of proper operation.

#### **2. Monitoring Procedure:**

- a. Monitoring to determine emission concentrations of the constituents listed below must be conducted on a continuing 12-month cycle, no later than the end of May each year.
- b. Sampling must be performed at the inlet and outlet of each ozone decomposer.
- c. A minimum of (2) two samples must be taken at each sampling location to ensure the data are representative. The sampling methods identified below must be used unless alternate methods are approved in writing by SWCAA in advance of the emission testing.
- d. The following pollutants must be sampled:

<u>Pollutant</u>	<u>Test Method or Equivalent</u>
Ozone	Colorimetric tubes, chemiluminescent or neutral buffered potassium iodide

#### **3. Source Operation:**

- a. A complete record of production related parameters including process startups, shutdowns, and adjustments must be kept during emissions testing to correlate operations with emissions and must be recorded in the final test report.
- b. Source operations during the emissions test must be representative of the maximum level of normal operation.

#### **4. Reporting:**

- a. All monitoring results must be recorded at the facility and reported to SWCAA in writing in a format designated by the Agency. Results must be reported within 15 calendar days of monitoring completion. At a minimum, the following information must be included in the report:
  - (1) Time and date of the performance monitoring;
  - (2) Identification of the personnel involved;
  - (3) Identification of the affected unit;
  - (4) A summary of results reported in units consistent with the applicable emission standard or limit (ppmv);
  - (5) A summary of equipment operating conditions (e.g., production rate, substrate material, etc.);
  - (6) A description of the evaluation methods or procedures used including all field data, quality assurance/quality control procedures and documentation;
  - (7) Copies of span gas documentation (as applicable); and
  - (8) Analyzer response check documentation (as applicable).
- b. Individual monitoring results must be reported as measured. Final average monitoring results must be reported as measured.

**5. Changes to Monitoring Requirements:**

Emission monitoring 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 monitoring schedule. Upon review of the request and in accordance with EPA delegation, SWCAA will inform the Permittee in writing of any approved modifications.