



April 26, 2017

Will Filbeck
Instafab Company, Inc.
2424 E 2nd Street
Vancouver, WA 98661

Subject: Preliminary Approval for Metal Fabrication Facility

Dear Mr. Filbeck:

A preliminary determination to issue Air Discharge Permit 17-3221 (ADP 17-3221) has been completed for ADP Application CL-2089 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-2089 was published in the permit section of SWCAA's internet website on October 4, 2016. SWCAA has determined that substantial public interest exists for this permitting action because SWCAA has received several requests for public comment period and a public hearing. Therefore, a 30-day public comment period and a public hearing will be provided prior to a final determination.

The public hearing is scheduled for June 14, 2017 at SWCAA at 11815 NE 99th Street, Suite 1294, Vancouver, starting at 6:00 p.m.

Electronic copies of ADP 17-3221 and the associated Technical Support Document are available for public review in the permit section of SWCAA's internet website (<http://swcleanair.org/permits/publiccomments.asp>). Original copies are enclosed for your files. Also enclosed is a copy of the newspaper notice that SWCAA will publish one time in the legal notice section of The Columbian. The cost of this publication will be billed to Instafab as prescribed in SWCAA 400-109(3). If you are not satisfied with this public notice, please contact SWCAA within three business days of receiving this letter. If you have any comments on this preliminary determination please notify SWCAA within the specified comment period. If no comments are received, your final Air Discharge Permit will be issued at the conclusion of the comment period.



If you have any comments, or desire additional information, please contact me or Vanessa McClelland at (360) 574-3058, extension 129.

Sincerely,

A handwritten signature in black ink that reads "Paul R. Maurose" followed by a stylized flourish or signature mark.

Uri Papish
Executive Director

UP: vm
Attachment

SOUTHWEST CLEAN AIR AGENCY

**Air Discharge Permit
SWCAA 17-3221**

Draft Date: April 26, 2017

Facility Name: Instafab Co.
Physical Location: 2424 E 2nd Street
Vancouver, WA 98661

SWCAA ID: 2487

REVIEWED BY: _____
Paul T. Mairose, Chief Engineer

APPROVED BY: _____
Uri Papish, Executive Director

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1. Equipment/Activity Identification

ID No.	Equipment/Activity	# of Units	Control Equipment	# of Units
1	Custom paint booth	1	Filter bank - high arrestance paint collectors	1
2	Welding	23	Building enclosure	1

2. Permit Terms and Conditions

The following tables detail the specific terms and conditions of this permit. In addition to the requirements listed below, equipment at this facility may be subject to additional federal, state, and local regulations. The permit term or requirement number is identified in the left hand column. The permit term or requirement is contained in the middle column. The emission unit, equipment, or activity to which the permit term or condition applies is listed in the right hand column.

2.1 Emission Limits

No.	Emission Limits	Equipment/Activity								
1.	<p>Emissions from painting operations must not exceed:</p> <table> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>VOC</td> <td>2.60 tpy</td> </tr> <tr> <td>TAPs</td> <td>Limited to SQER for each pollutant so as not to exceed the VOC emission limit established above</td> </tr> </tbody> </table> <p>Emissions must be determined consistent with Section 6 of the Technical Support Document.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	VOC	2.60 tpy	TAPs	Limited to SQER for each pollutant so as not to exceed the VOC emission limit established above	1		
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VOC	2.60 tpy									
TAPs	Limited to SQER for each pollutant so as not to exceed the VOC emission limit established above									
2.	<p>Emissions from welding operations must not exceed:</p> <table> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>PM/PM₁₀/PM_{2.5}</td> <td>0.04 tpy</td> </tr> <tr> <td>Chromium (VI)</td> <td>0.01 lb/year</td> </tr> <tr> <td>TAPs</td> <td>Limited to SQER for each pollutant</td> </tr> </tbody> </table> <p>Emissions must be determined consistent with Section 6 of the Technical Support Document.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM/PM ₁₀ /PM _{2.5}	0.04 tpy	Chromium (VI)	0.01 lb/year	TAPs	Limited to SQER for each pollutant	2
<u>Pollutant</u>	<u>Emission Limit</u>									
PM/PM ₁₀ /PM _{2.5}	0.04 tpy									
Chromium (VI)	0.01 lb/year									
TAPs	Limited to SQER for each pollutant									
3.	<p>Visible emissions shall not exceed the values listed below for more than 3 minutes in any one hour period as determined by a Certified Observer in accordance with SWCAA Method 9.</p> <table> <thead> <tr> <th><u>Emission Unit</u></th> <th><u>Opacity Limit</u></th> </tr> </thead> <tbody> <tr> <td>All equipment and processes</td> <td>0%</td> </tr> </tbody> </table>	<u>Emission Unit</u>	<u>Opacity Limit</u>	All equipment and processes	0%	1-2				
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All equipment and processes	0%									

2.2 Operating Limits and Requirements

No.	Operating Limits and Requirements	Equipment/ Activity
4.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Plantwide
5.	Operations that cause or contribute to odors that unreasonably interfere with any other property owner's use and enjoyment of their property shall use recognized good practice and procedures to reduce those odors to a reasonable minimum.	Plantwide
6.	The outside doors near the spray booth must be kept closed during spray painting operations.	1
7.	The exhaust stack from the spray booth must be vertical. Any rain cap which interferes with vertical discharge is prohibited.	1
8.	A differential pressure gauge must be installed and maintained on the filter bank of the spray booth.	1
9.	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.	1
10.	The spray booth must be fitted with particulate matter filters on the exhaust that are demonstrated to achieve 98 percent capture of paint overspray.	1
11.	All containers of materials containing VOCs must be kept securely closed except when materials are being added, mixed, or removed. All materials containing VOCs which are used to clean and/or flush spray equipment or lines during cleanup must be collected in a closed container. Solvent cleaning of tools must be conducted in a closed container.	1
12.	Each pollution control device must be operated whenever the processing equipment served by that control device is in operation. Control devices must be operated and maintained in accordance with the manufacturer's specifications. Furthermore, control devices must be operated in a manner that minimizes emissions.	1
13.	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.	1-2

2.3 Monitoring and Recordkeeping Requirements

No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity
14.	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.	1-2
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.	1-2

No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity
16.	<p>Operation of the spray booth 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. Must be recorded for each calendar year</p> <p>(b) Amounts and types of hazardous waste disposed. Must be recorded for each calendar year</p> <p>(c) Pressure drop across the paint booth filter systems. Must be recorded once per week. If the spray booth is not operated during that week, that fact must be noted in the log instead of a pressure reading</p> <p>(d) Maintenance/repair activities including filter replacements. Must be recorded for each occurrence</p>	1
17.	<p>Welding operations must be monitored and recorded as follows:</p> <p>(a) Amount and type of welding rod or wire used. Must be recorded for each calendar year</p>	2
18.	All upset conditions and/or excess emissions must be recorded for each occurrence.	1-2

2.4 Emission Monitoring and Testing Requirements

None

2.5 Reporting Requirements

No.	Reporting Requirements	Equipment/ Activity
19.	<p>SWCAA must be notified at least seven days in advance of the use of any new material which will result in emissions of toxic or hazardous air pollutants not previously emitted and reviewed. The written notice must include the following:</p> <p>(a) A description of the proposed change(s) in materials with an SDS for each new material,</p> <p>(b) The date the change(s) is (are) to be made,</p> <p>(c) The change(s) in emissions of VOCs, HAPs and TAPs occurring as a result of the change, and</p> <p>(d) A summary of any applicable requirement(s) that would apply as a result of the change(s).</p> <p>If the proposed emission rate of a new TAP exceeds the SQER and/or the VOC limit established in this Permit or otherwise circumvents an applicable requirement including those established by this Permit, New Source Review must be required prior to making the proposed change.</p> <p>Any new product used only for testing purposes does not need to be reported to SWCAA prior to use, provided the quantity of usage does not exceed five (5) gallons.</p>	Plantwide
20.	Upset conditions must be reported to SWCAA five business days after discovery. The permittee may provide notification to SWCAA via telephone. A message may be left on the answering machine for upset conditions that occur outside of normal business hours.	Plantwide

No.	Reporting Requirements	Equipment/ Activity
21.	<p>Excess emissions shall be reported to SWCAA as follows:</p> <ul style="list-style-type: none"> • As soon as possible, but no later than 12 hours after discovery for emissions that represent a potential threat to human health or safety; • 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(1); and • No later than 30 days after the end of the month of discovery for all other excess emissions. 	Plantwide
22.	<p>The following operations of the steel fabrication facility must be reported annually to SWCAA in written form by March 15th of the previous year:</p> <ul style="list-style-type: none"> (a) Amounts and types of hazardous waste disposed; (b) Annual throughput of evaporative products (paint, solvent, etc.); (c) Annual amount and type of welding rod/wire used; and (d) Summary of emissions. 	1-2

3. General Provisions

No.	General Provisions
A.	The equipment and activities specified in Air Discharge Permit application CL-2089 must be maintained and operated in total and continuous conformity with the emission levels 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.
B.	For the purpose of ensuring compliance with this Permit, 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 Permit and applicable regulations and to perform or require such tests as may be deemed necessary.
C.	The provisions, terms and conditions of this Permit must be deemed to bind the permittee, its officers, directors, agents, servants, employees, successors and assigns, and all persons, firms, and corporations acting under or for the permittee.
D.	The requirements of this Permit shall survive any transfer of ownership of the source or any portion thereof.
E.	This Permit must be posted conspicuously at or be readily available near the source.
F.	This Permit must be invalid if construction/installation has not commenced within eighteen months from date of issuance.
G.	This Permit does not supersede requirements of other Agencies with jurisdiction and further, this Permit does not relieve the permittee of any requirements of any other governmental Agency. In addition to this Permit, the permittee may be required to obtain permits or approvals from other agencies with jurisdiction.
H.	Compliance with the terms of this Permit does not relieve the permittee from the responsibility of compliance with SWCAA General Regulations for Air Pollution Sources, previously issued Regulatory Orders, RCW 70.94, Title 173 WAC or any other applicable emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply.

No.	General Provisions
I.	If any provision of this Permit is held to be invalid, all unaffected provisions of the Permit must remain in effect and be enforceable.
J.	No change in this Permit must 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.
K.	The permittee must have the burden of proof regarding unavoidable conditions that lead to excess emissions in accordance with SWCAA 400-107 "Excess Emissions." Excess emissions must be reported to SWCAA as soon as possible. The permittee must call in the upset condition via telephone as initial notification to SWCAA; a message may be left on the answering machine for conditions outside of normal business hours. The permittee must record the upset conditions in the operations log for periodic inspection by SWCAA. A full report may be required by SWCAA if determined to be necessary.
L.	The Southwest Clean Air Agency may, in accordance with RCW 70.94 impose such conditions as are reasonably necessary to assure the maintenance of compliance with the terms of this Permit, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act.

PUBLIC NOTICE

Notice to the public is hereby given that the Southwest Clean Air Agency (SWCAA) has made a preliminary determination to issue Air Discharge Permit SWCAA 17-3221 to Instafab Co. This preliminary determination allows for the approval to operate an existing metal fabrication facility at 2424 E 2nd Street, Vancouver, Clark County, Washington. The facility is a potential source of PM, VOCs, TAPs, and HAPs from spray coating and welding.

The public has an opportunity to review and comment on the preliminary Air Discharge Permit. All written or oral comments must be received by SWCAA within 30 days after this publication. Final action by SWCAA to approve, modify, or deny the proposal will be taken within 10 days after the close of the comment period. If there is a demonstrated significant public interest, a public meeting may be held at the close of the public comment period. The material is available for review at 11815 NE 99th Street, Suite 1294, Vancouver, Washington, Monday through Friday from 7:00 a.m. to 5:30 p.m. or online at <http://swcleanair.org/permits/publiccomments.asp>.



State Environmental Policy Act

DETERMINATION OF NONSIGNIFICANCE (DNS) – SWCAA 17-011

Description of proposal:

ADP Application: The proponent has applied for a permit to approve an existing metal fabrication facility including a spray booth and welding equipment. At the emission levels proposed, this equipment will not have a significant adverse impact on ambient air quality. Anticipated environmental impact on any media other than air is expected to be negligible. This permitting action is not expected to have any effect on traffic, noise, glare, housing, or recreation opportunities.

Proponent:

Instafab Co. (Bruce Perkins)

Location of proposal, including street address if any:

2424 E 2nd Street, Vancouver, WA 98661

Lead agency: Southwest Clean Air Agency

The lead agency for this proposal has determined that it does not have a probable significant impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.

There is no comment period for this DNS.

This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 15 days from the date below. Comments must be submitted by 5/12/17.

Responsible official: Paul T. Mairose, P.E.

Position/title: Chief Engineer

Address: Southwest Clean Air Agency
11815 NE 99th Street, STE 1294
Vancouver, WA 98682-2454

Phone: (360) 574-3058 ext. 130

Signature: Paul T. Mairose

Date: 4/26/17

