



Southwest Clean Air Agency

11815 NE 99th Street, Suite 1294 • Vancouver, WA 98682-2322
(360) 574-3058 • Fax: (360) 576-0925
www.swcleanair.org

June 21, 2010

Mr. Joel Ball, Plant Manager
Imperial Fabricating Company
206 Maurin Road
Chehalis, WA 98532

Subject: Final Air Discharge Permit for Operation of Vehicle Parts Manufacturing Facility

Dear Mr. Ball:

A final determination to issue Air Discharge Permit 10-2937 (ADP 10-2937) has been completed for Air Discharge Permit (ADP) Application L-612 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 L-612 was published in the permit section of SWCAA's internet website on November 15, 2007. 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 10-2937 and the associated Technical Support Document are available for public review in the permit section of SWCAA's internet website (www.swcleanair.org/permitsfinal.html). Original copies are enclosed for your files.

This Air Discharge Permit may be appealed directly to the Pollution Control Hearings Board (PCHB) at P.O. Box 40903, Olympia, Washington 98504-0903 within 30 days of receipt as provided in RCW 43.21B.

If you have any comments, or desire additional information, please contact me or Natalia Kreitzer at (360) 574-3058, extension 14.

Sincerely,

Robert D. Elliott
Executive Director

RDE:nlk
Attachment



SOUTHWEST CLEAN AIR AGENCY

**AIR DISCHARGE PERMIT
10-2937**

Date: June 21, 2010

Facility Name: Imperial Fabricating Company
Physical Location: 206 Maurin Road
Chehalis, WA 98532

SWCAA ID: 2306

REVIEWED BY:


Paul Mairose, Chief Engineer



APPROVED BY:


Robert D. Elliott, Executive Director

TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
1. Equipment/Activity Identification	1
2. Approval Conditions	1
2.1 Emission Limits	1
2.2 Operating Limits and Requirements	2
2.3 Monitoring and Recordkeeping Requirements	2
2.4 Emission Monitoring and Testing Requirements	2
2.5 Reporting Requirements	3
3. General Provisions	3

1. Equipment/Activity Identification

ID No.	Generating Equipment/Activity	# of Units	Control Equipment	# of Units
1	Welding Activities	N/A	Fume Filters	9
2	Space Heating – 15 Renzor heaters	15	Natural gas	N/A

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.

2.1 Emission Limits

No.	Emission Limits	Equipment/Activity								
1.	<p>Combined emissions from welding, cutting and gouging shall 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>PM₁₀</td> <td>0.10 tpy</td> </tr> <tr> <td>Chromium</td> <td>5 lb/yr</td> </tr> <tr> <td>Nickel</td> <td>1.7 lb/yr</td> </tr> </tbody> </table> <p>Annual emissions shall be calculated based on the methodology in Section 6 of the Technical Support Document.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM ₁₀	0.10 tpy	Chromium	5 lb/yr	Nickel	1.7 lb/yr	1
<u>Pollutant</u>	<u>Emission Limit</u>									
PM ₁₀	0.10 tpy									
Chromium	5 lb/yr									
Nickel	1.7 lb/yr									
2.	<p>Emissions from the space heaters shall not exceed:</p> <table border="0"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>NO_x</td> <td>1.61 tpy</td> </tr> <tr> <td>CO</td> <td>1.35 tpy</td> </tr> </tbody> </table> <p>Annual emissions shall be calculated based on the methodology in Section 6 of the Technical Support Document.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO _x	1.61 tpy	CO	1.35 tpy	2		
<u>Pollutant</u>	<u>Emission Limit</u>									
NO _x	1.61 tpy									
CO	1.35 tpy									
3.	<p>Emissions of toxic air pollutants (TAPs) to the atmosphere, except those listed in item 1 above, shall not exceed the individual respective Small Quantity Emission Rate for each TAP as provided in WAC 173-460 as effective on August 21, 1998. Emissions shall be determined based on the methodology outlined in Section 6 of the Technical Support Document for this Permit.</p>	Plantwide								
4.	<p>Visible emissions from welding, cutting and gouging operations shall not exceed ten percent opacity for more than 3 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).</p>	1-2								

2.2 Operating Limits and Requirements

No.	Operating Limits and Requirements	Equipment/ Activity
5.	Reasonable precautions shall be taken at all times to prevent and minimize fugitive emissions from plant operations.	Plantwide
6.	Operations that cause or contribute to a nuisance odor shall use recognized good practice and procedures to reduce these odors to a reasonable minimum.	Plantwide
7.	Each pollution control device shall be operated whenever the processing equipment served by that control device is in operation. Control devices shall be operated and maintained in accordance with the manufacturer's specifications. Furthermore, control devices shall be operated in a manner that minimizes emissions.	1
8.	The space heaters shall be fired on natural gas only.	2
9.	No later than the end of September 2010 the center of each fan that discharges to ambient air shall exhaust at least 17 feet above ground level.	1
10.	The amount of stainless electrode used shall not exceed 112,870 lbs per year.	1
11.	Emission units identified in this Permit shall 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
12.	Each record required by this Permit shall 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 shall be made to that effect.	1,2
13.	All records required by this Permit shall be kept for a minimum period of no less than three years and shall be maintained in a form readily available for inspection by SWCAA representatives.	1,2
14.	Excess emissions and upset conditions shall be recorded for each occurrence.	1,2
15.	Operations shall be recorded as follows: (a) Filter changes, bag replacements and maintenance activities shall be recorded for each occurrence; (b) Natural gas consumption shall be recorded monthly; (c) Welding, cutting and gouging wire and rod purchases shall be recorded for each purchase; and (d) Air emissions shall be recorded annually.	1-4

2.4 Emission Monitoring and Testing Requirements

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

2.5 Reporting Requirements

No.	Reporting Requirements	Equipment/ Activity
16.	<p>The following operational data shall be reported to SWCAA by March 15 for the previous calendar year:</p> <ul style="list-style-type: none"> (a) Annual natural gas consumption; (b) Annual welding wire and rod consumption; and (c) Air emissions. 	Plantwide
17.	<p>The permittee shall notify SWCAA at least seven days in advance of the use of any new material, which results in the emission of toxic or hazardous air pollutants not listed in the Technical Support Document for this Permit. In response to the notification, SWCAA may require that a written report be submitted with the following:</p> <ul style="list-style-type: none"> (a) A description of the proposed change(s) in materials with an MSDS for each new material, (b) The date the change(s) is (are) to be made, (c) The change(s) in emissions of VOCs, HAPs and TAPs occurring as a result of the change, and (d) A summary of any applicable requirement(s) that would apply as a result of the change(s). <p>If the proposed emission rate of a new TAP exceeds the applicable SQER and/or other emission limits established by this Permit or otherwise circumvents an applicable requirement, New Source Review may be required prior to making the proposed change.</p>	Plantwide
18.	<p>Upset conditions shall be reported to SWCAA as soon as possible 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.</p>	1-2
19.	<p>Excess emissions shall be reported to SWCAA in accordance with SWCAA 400-107(1). Excess emissions which the permittee wishes to claim as unavoidable must be reported as soon as possible, but no later than 48 hours after discovery.</p>	1-2

3. General Provisions

No.	General Provisions
A.	<p>For the purpose of ensuring compliance with this Permit, duly authorized representatives of the Southwest Clean Air Agency shall 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.</p>
B.	<p>The provisions, terms and conditions of this Permit shall 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.</p>
C.	<p>The requirements of this Permit shall survive any transfer of ownership of the source or any portion thereof.</p>
D.	<p>This Permit shall be posted conspicuously at or be readily available near the source.</p>

No.	General Provisions
E.	This Permit shall be invalid if construction/installation has not commenced within eighteen months from date of issuance.
F.	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.
G.	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.
H.	If any provision of this Permit is held to be invalid, all unaffected provisions of the Permit shall remain in effect and be enforceable.
I.	No change in this Permit shall 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 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.



Southwest Clean Air Agency

11815 NE 99th Street, Suite 1294 • Vancouver, WA 98682-2322
(360) 574-3058 • Fax: (360) 576-0925
www.swcleanair.org

State Environmental Policy Act

DETERMINATION OF NONSIGNIFICANCE (DNS)

Description of proposal:

ADP Application L-612: Permitting of an existing motor vehicle parts assembly facility. This project does not result in the creation of any buildings or structures, modification of stormwater runoff, disturbance of vegetation or modification to animal habitat.

Proponent:

Imperial Fabricating Company

Location of proposal, including street address if any:

206 Maurin Road, Chehalis, WA 98532

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 _____.

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

Position/title: Chief Engineer

Address: Southwest Clean Air Agency
11815 NE 99 St., Ste 1294
Vancouver, WA 98682-2322

Phone: (360) 574-3058 ext 30

Signature: Paul T. Mairose

Date: 6/21/10

