



## YAKIMA REGIONAL CLEAN AIR AGENCY

Order of Approval Permit No. NSRP-05-CSC-08

### New Source Review Order of Approval for Canam Steel Corporation for the Water Based Dipping Operations.

IN THE MATTER OF approving a project which establishes a new air contaminant source at Canam Steel Corporation (CSC), THIS ORDER OF APPROVAL IS HEREBY ISSUED TO:

**Applicant/Permittee:** Canam Steel Corporation  
*Prefabricated Structural Steel metal parts*

**Located at:** 2002 Morgan Rd.  
Sunnyside, WA 98944

**Contact:** Canam Steel Corporation  
Sam Clark  
Safety, Health & Environmental Coordinator  
2002 Morgan Rd.  
Sunnyside, WA 98944  
(509) 837-7008

IN COMPLIANCE WITH THE PROVISIONS OF THE STATE OF WASHINGTON CLEAN AIR ACT (Revised Code of Washington (RCW) CHAPTER 70.94.152, WASHINGTON ADMINISTRATIVE CODE (WAC) 173-400-110 AND WAC 173-460-040.

**ISSUE DATE:** November 19, 2009

THIS ORDER OF APPROVAL PERMIT IS SUBJECT TO THE FOLLOWING CONDITIONS:

**Construction of the equipment must be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise specified herein. The conditions and limitations of this NSR Order of Approval are attached as follows and shall become federally enforceable and required provisions of the Title V Air Operating Permit AOP # Y-005-01:**



## DESCRIPTION OF THE SOURCE

1. Canam Steel Corporation hereafter referred to as the permittee or CSC is a Title V company in accordance with the Federal Clean Air Act. The permittee has been issued an Air Operating permit in March 21, 2000 and renewed and issued in September 8, 2006 for a period of five years term. The permittee operates and fabricate structural steel members i.e., trusses and joist (processes details for the facility are found in the statement of bases of the Title V AOP permit AOP # Y-005-01). The facility operation is located at 2002 Morgan Rd., Sunnyside, WA.
2. The permittee is replacing the paint in their paint dipping operation to water based paint (Armorchem Hybrid-41K-485) as specified in the application and the information submitted with the application.
3. Air emissions from this operation are primarily in the form of Volatile Organic Compounds (VOCs), some of which are known as Hazardous Air Pollutants (HAPs) and/or Toxic Air Pollutants (TAPs) in accordance with the Federal Clean Air Act (FCAA) or Washington Administrative Code (WAC) 173-460-150 and 160, respectively. These emissions are emitted from the paint dipping operations. The City of Sunnyside issued a Determination of Non-Significance (DNS) with respect to the State Environmental Policy Act (SEPA) review for this project.
4. The layout and specifications of paint dipping operations were submitted with the NSR application and are part of this permit as provided by the permittee.
5. Installation of the new paint dipping products is considered a modification of air contaminants requiring a NSR permit pursuant to the Revised Code of Washington (RCW) 70.94.152 and the WAC 173-400-110 and 173-460-040. This facility is located in an area that is in attainment with all state and federal air quality standards for all criteria pollutants.

**THEREFORE**, it is hereby ordered that the project as described above, in the NSR application, and in detailed plans, specifications and other information submitted in reference thereto, is approved for construction, installation and operation, provided the following conditions are met:

## OPERATIONAL CONDITIONS

6. This Order of Approval permit is for the paint dipping operations, located at 2002 Morgan Rd., Sunnyside, Washington, in accordance with the plan and specifications submitted with the NSR application to Yakima Regional Clean Air Agency (YRCAA) and specified in Table 1 of this Order of Approval.



7. This facility is subject to 40 CFR Part 63, Subpart M (Surface Coating of Miscellaneous Metal Parts and Products). The maximum combined fugitive and point source emissions of HAP's in the overall facility operation shall not exceed 24.1 and/or 9.9 tons for any combined or single HAP, respectively, on a moving 12 month arithmetic average.
8. As provided in the RCW 70.94.152, WAC 173-400-113 and WAC 173-460-060, Best Available Control Technology (BACT) and Toxic-BACT (T-BACT), respectively, are required to control all air emissions from any proposed new facility or modified source. YRCAA finds BACT and T-BACT analysis to be satisfied as follows:
  - 8.1 Use of Armorchem Hybrid-41K-485 water based paint for paint dipping operations; and
  - 8.2 The permittee shall develop, maintain and implement an Operation and Maintenance (O&M) plan for the paint dipping operations, including appropriate training for all operators.
9. This permit authorizes the use of the following equipment/installation:

**Table 1. Authorized Equipment List.**

Emission Unit or Activity	Description
2 paint dip tanks	Armorchem Hybrid-41K-485 water based paint; dip tank capacity, 14,000 ft <sup>3</sup> and 6,266 ft <sup>3</sup>
8 fans	5 hp each, used for building exhaust

10. There must be no fallout or any fugitive emissions from this installation or operation beyond the property boundary in a quantity that interferes unreasonably with the use and enjoyment of the property owner upon which the material is deposited or is detrimental to the health, safety or welfare of any person or causes damage to any property or business.
11. The permittee must develop and implement a site-specific O&M plan for the paint dipping operations based on the manufacturer and owners/operators experience as part of BACT. The permittee must develop the O&M plan within 60 days after the issuance of this Order.
12. Within 60 days from the date of issuance of this order of approval, the permittee shall submit a letter notifying YRCAA that the O&M plan is completed and in place. If the permittee needs to make any future modification to the paint dipping operations, or their operating procedures, an approval in writing from YRCAA must be issued before such modification takes place. The O&M documents must be updated and implemented to reflect such





modification.

13. Visible emissions from the paint dipping operation shall be limited to zero percent (0 %) opacity as measured by 40 CFR 60 Appendix A, Method 9. No visible emission shall be allowed from any other stack or building opening. If the permittee observes visible emissions from any emission point, the permittee shall immediately stop the operation creating the emission and take corrective action as directed in the O&M Plan until no more visible emissions are observed.
14. All building fans and exhaust systems must be equipped/fitted with filters to reduce and minimize air emission. If and when this building will be used for paint spray, a NSR will be required and must have a negative pressure for the building.
15. Permit requirements apply to the facility owner and/or operator(s) and any contractor or subcontractor performing any activity authorized under this permit. Any person(s), including contractor(s) and/or subcontractor(s), not in compliance with the applicable requirements in this permit are in violation of Federal, State and local laws and subject to appropriate civil and criminal penalties. The facility owner and/or operator, and all contractor(s) or subcontractor(s) are liable for the actions and violations of their employee(s). Any violation committed by a contractor or subcontractor shall be considered a violation by the facility owner and/or operator, and is also a violation by the contractor and/or any subcontractor(s).
16. The YRCAA Air Pollution Control Officer (APCO) or his representative shall be allowed to enter the facility at reasonable times to inspect for compliance with applicable regulations and the conditions of this Order.

### **GENERAL CONDITIONS**

17. Modification of the paint dipping operations, and any other emission points at this facility shall be in compliance with all other requirements specified in all current federal, state and local air pollution laws and regulations, including but not limited to RCW 70.94.152 (Washington Clean Air Act), WAC 173-400 (General Regulations for Air Pollution Sources), WAC 173-460 (Controls for New Sources of Toxic Air Pollutants), and the YRCAA Regulation 1.
18. All plans, specifications or other information submitted to YRCAA and any further authorizations or approvals or denials in relation to this project, shall be incorporated herein and made a part of the YRCAA file and this permit.
19. Nothing in this approval shall be construed as preventing or evading compliance with any other requirement(s) of law including those imposed pursuant to the Washington Clean Air Act, and rules and regulations thereunder. Any violation(s) of such rules and regulations are



- penalized in accordance with RCW 70.94.430 and YRCAA Regulation 1, Article 5, Penalties.
20. Authorization may be modified, suspended or revoked in whole or part for cause including, but not limited to, the following:
- 20.1 Violation of any terms or conditions of this authorization; or,
- 20.2 Obtaining this authorization by misrepresentation or failure to disclose fully all relevant facts.
21. The provisions of this authorization are severable and, if any provision of this authorization, or application of any provisions of this authorization to any circumstance, is held invalid, the application of such provision to their circumstances, and the remainder of this authorization, shall not be affected thereby.
22. The RCW rules and regulations may be superseded or revised without notice. It is the permittee's responsibility to stay current with rules and regulations governing their business and therefore is expected to comply with all new rules and regulations immediately upon their effective date. Rules and regulation updates will be incorporated into existing permits or upon renewal or modification of said permits.
23. All air emissions from this facility shall be in compliance with air emission standards at all times. It is the responsibility of the owner to make sure that air emissions are within all known rules and regulations.
24. Deviations from these conditions are violations subject to penalties in accordance with RCW 70.94.430 and 431, WAC 173-400-230 and YRCAA Regulation 1, Article 5, Section 5.02.
25. Any person feeling aggrieved by this NSR order of approval permit may obtain review thereof by application, within thirty (30) days of receipt of this NSR permit to the Pollution Control Hearings Board (PCHB), P.O. Box 40903, Olympia, WA. 98504-0903. Concurrently, a copy of the application must be sent to the Yakima Regional Clean Air Agency, 329 N. 1<sup>st</sup> St., Yakima, WA. 98901. These procedures are consistent with the provisions of Chapter 43.12B RCW and the rules and regulations adopted thereunder.
26. If, or whenever the permittee wants to modify the operation, install new equipment or change the quantity set forth in Appendix A of this permit, another NSR application must be filed and approved with YRCAA before the changes take place and BACT and T-BACT requirements must be satisfied.



## EMISSION LIMITS

27. The permittee is limited to 50,000 gallons of Armorchem Hybrid-41K-485 paint use per year. Table 2 shows the actual air emissions from this facility, Appendix A shows the calculations for these air emissions.
28. Over all emissions from the facility are specified in the Title V AOP #Y-005-01. In addition, HAPs emission from any single HAPs shall not exceed 9.9 Tons per year.

**Table 2. Canam Steel Corporation Actual and Allowable Air Emissions.**

<b>Pollutant</b>	<b>Actual Emissions (ton/year)*</b>	<b>Allowable Emissions (ton/year)</b>
Volatile Organic Compounds (VOC)	19.8	24.8
Toxic Air Pollutants (TAPs)	5.6	6.9

\*Above emissions are based on the information provided by Canam Steel Corporation and USEPA AP-42.

## MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS

29. Operation and Maintenance procedures shall include but not be limited to the following:
- 29.1 Containers of fresh or waste coating shall be closed at all times except when such containers are being used;
  - 29.2 Collected waste coating shall be reused or sent to licensed hazardous waste treatment facilities for disposal;
  - 29.3 Required scheduled lubrication of all moving parts as specified by the equipment manufacturer (i.e. ceiling fans);
  - 29.4 High efficiency filters shall be replaced as specified by the manufacturers or when needed; and
  - 29.5 Scheduled inspection and replacement of equipment or parts for wear and tear, as specified by the equipment manufacturer.
30. The paint dipping operation maintenance shall be logged and kept on site. Any log shall be designed by the permittee and shall contain at least the date, operator name and specific action taken.





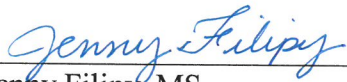
31. The required records, logs and a copy of the O&M plan for this facility shall be kept on site and shall always be readily available, organized and accessible when requested by YRCAA APCO or his representative or during an inspection. The O&M plan shall be updated to reflect any changes in operating procedures and such changes shall be routinely implemented.
32. Material Safety Data Sheets (MSDS) of all materials contributing to HAP, TAP and VOC emissions shall be maintained on-site and readily accessible when requested by YRCAA personnel.
33. All records shall be kept and maintained at the site for at least the most recent three year period from any present time and be made available during inspections or when requested by YRCAA.
34. Total emissions for criteria pollutants, HAPs, TAPs and VOCs must be calculated and reported to YRCAA on an annual basis as specified in the annual registration provided by YRCAA to the facility.
35. All recordkeeping required in this permit must be reported to YRCAA as specified in the AOP # Y-005-01.
36. Any application form, report, or compliance certification, including the annual consumption report, submitted pursuant to this permit and the AOP must be signed by a responsible official.



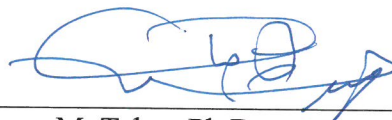
37. This permit and its conditions shall remain in effect in the event of any change in control or ownership of the facility. In the event of any such change in control or ownership of the subject facility, the permittee shall notify the succeeding owner of the permit and conditions and shall notify the YRCAA of the change in control or ownership as specified in the AOP.
38. This permit will be considered invalid without paying the complete appropriate/required fees to YRCAA, pursuant to RCW 70.94.152.

DATED at Yakima, Washington this 19 day of November, 2009.


PREPARED BY:

  
Jenny Filipy, MS  
Air Quality Engineer  
Yakima Regional Clean Air Agency

REVIEWED & APPROVED BY:

  
Hasan M. Tahat, Ph.D.  
Engineering and Planning Division Supervisor  
For  
Gary W. Pruitt  
Air Pollution Control Officer  
Yakima Regional Clean Air Agency

REVIEWED BY:

  
Joseph Andreotti, P.E.,  
Andreotti and Associates



S:\Engineering\Planning\Title V\Cann\Title V\Permit\NSRP-05-CSC-08.doc

11/17/09



Product Name	CAS No.	Chemical Name	Chemical Fraction by weight	Usage (gallons)	Allowable Use (gallons)	VOC Density (lb/gal)	Emissions (lb/year)	Allowable Emissions (lb/year)	Model Concentrations (µg/m <sup>3</sup> )	ASIL (µg/m <sup>3</sup> )	Averaging Period	SQER (lb/ averaging period)	De Minimis (lb/ averaging period)	Classification
ArmorChem WG-2 Hybrid 41K-485	111-76-2	n-Butoxyethanol	0.013	40000	50000	7.83	4072	5090	162	13000	24 hour	1710	85.4	TAP, VOC
ArmorChem WG-2 Hybrid 41K-486	7664-41-7	Ammonia	0.0025	40000	50000	7.83	783	979	31	70.8	24 hour	9.31	0.465	TAP, VOC
ArmorChem WG-2 Hybrid 41K-487	1333-86-4	Carbon Black	0.00378	40000	50000	7.83	1184	1480	47	N/A	N/A	N/A	N/A	VOC
ArmorChem WG-2 Hybrid 41K-489		VOC All		40000	50000	0.53	21200	26500	844					VOC
MC-28002B pH Reducer	108-01-0	Dimethylaminoethanol	0.5	3281.3	4101.6	7.40	12141	15176	483	N/A	N/A	N/A	N/A	VOC
MC-28001A Water Reducer	111-76-2	n-Butoxyethanol	0.384	2080	2600	7.84	6262	7827	249	13000	24 hour	1710	85.4	TAP, VOC

Total VOC (lb/yr)	39602	49503
Total TAP (lb/yr)	11116	13895
Total VOC (ton/yr)	19.8	24.8
Total TAP (ton/yr)	5.6	6.9