RECEIVED
FEB 17 2025
By EGR-email

Updated application.
(Original received on 09/10/24)

YAKIMA REGIONAL CLEAN AIR AGENCY

186 Iron Horse Court, Suite 101. Yakima, WA. 98901
Phone: (509) 834-2050 Fax: (509) 834-2060
Website: http://www.yakimacleanair.org

Filing Fee: $400.00*

***Pursuant to WAC 173-400-111(1) (e)-an application is not complete until the permit application filling fee required by YRCAA has been paid.**

OFFICAL USE ONLY

YRCAA NSR No: NSRP-10-PF-24 Date Fee Paid: 09/10/24

Received by: EGR-email Filing Fee: **$400.00**

☐ YRCAA is the lead agency for the SEPA process. Processing Fee $400.00

Review of the application will not begin, until the application filling fee is paid. A surcharge fee for the time required for preparing and processing the application for approval will be invoiced after the permit to operate is issued.

New Source Review (NSR) Application General

Stationary/Permanent Source

INSTALLATION OR ESTABLISHMENT OF NEW AIR CONTAMINANT SOURCES

NSR Application is Required for Construction, Installation or Establishment of an Air Pollution Source
Or
Replacement or Substantial Alteration of Emission Control Technology on an Air Pollution Source or Equipment

I. General Information:

BUSINESS NAME Paragon Films Inc.

NATURE OF BUSINESS Stretch(Plastic) Films Production

MAILING ADDRESS 3500 W. Tacoma St., Broken Arrow, OK 74012

FACILITY ADDRESS (if different): 915 Rose St., Union Gap, WA 98903

PHONE and FAX NUMBERS (509) 424.3700 Fax: (509)424.3701 Email: steven.mitchell@paragonfilms.com

TYPE OF PROCESS, EQUIPMENT, OR APPARATUS Installation of 6 resin silos and associated piping and blower to move resin from the silo to the resin hoppers on the production line

LIST OF AIR CONTAMINANT(S) WHICH WILL BE PRODUCED AND/OR CONTROLLED Particulate Matters(PM10 and PM2.5)

ESTIMATED STARTING DATE:

ESTIMATED COMPLETION DATE: 10.8.2024

Compliance with SEPA (State Environmental Policy Act) - Check One of the Options Below:

- ☒ A DNS or EIS has been Issued by Another Agency for this Project and a Copy is Attached.
- ☐ If no DNS or EIS Exists for this Project, a Completed Checklist for this Project and the SEPA Processing Fee are Attached. *YRCAA SEPA checklist is available by phone, or by our website.*
- ☐ The city/county has established an exemption for this project.
- ☐ I certify that the SEPA has been satisfied or this project is exempt:

_____ *by* _____
Date *Government Agency*

Previous NSR/Air Permits Number issued by YRCAA for the Facility, if any NSRP-22-PF-13 NSRP-04-PF-15 NSRP-02-PF-15 NSRP-12-PF-17

Describe Input to Output Process (Attach drawings, schematics, prints, or block diagrams) Resin pellets are brought to site via railcar, off-loaded into silos then then dispersed into a hopper which feeds the extruder where the resin is melted

ESTIMATED COSTS: OF BASIC SOURCE EQUIPMENT $ $662,000.00

OF CONTAMINANT CONTROL APPARATUS $ $22,500.00

Process: Production Output per Year (tons, pounds, etc) 20 million lbs.

Maximum Output per Hour (tons, pounds, etc) 4,400 lbs.

Percentage of Production (%)

Dec - Feb 40% Mar – May 40%

Jun - Aug 40% Sep – Nov 40%

Operating Schedule: Hrs/Day 24 Days/Wk 7 Wks/Yr 52

II. Emissions Estimations and Calculations:

1. Criteria Pollutants (gr/dscf, tons/yr, lbs/hr., ppm, etc.)

Particulate (PM_{10},$PM_{2.5}$) _____

Volatile Organic Compounds N/A

Nitrogen Oxides N/A

Sulfur Oxides N/A

Carbon Monoxide N/A

Lead N/A

2. Toxic Air Pollutants (Name) — Quantity (in gr/dscf, tons/yr, lbs/hr. ppm, etc.)

Toxic Air Pollutants (Name)	Quantity (in gr/dscf, tons/yr, lbs/hr. ppm, etc.)
N/A	N/A

3. Fugitive Pollutants (Source) — Quantity (in gr/dscf, tons/yr, lbs/hr. ppm, etc.)

N/A — N/A

4. Air Pollution Modeling

Results _____

Computer Printout Attached? ☐Yes ☐No

III. Emission Data:

1. Stack

Height (Feet) N/A Inside Diameter (feet) _____

Gas Exit Temp (degrees F) _____ Gas Exit Velocity (ft/min) _____

Flow Rate (cfm) _____

Shared Stack? If a shared stack, identify process (es) or point(s) which share the stack.

Distance from Stack to Property Line _____

2. Discharge Point or points (if no stack or other than stack)

Height (feet) N/A Inside Diameter (feet) _____

Gas Exit Temp (degrees F) _____ Gas Exit Velocity (ft/min) _____

Flow Rate (cfm) _____

Shared discharge point? If a shared discharge point, identify process (es) or point(s) which share the discharge point. N/A

Distance from discharge point to Property Line _____

3. Fuel

Type N/A % Sulfur _____

% Ash _____ Unit of Measure (gal./cu.ft./etc.) _____

BTU per Unit of Measure _____ Consumption Units per Year _____

Maximum Consumption Units per Hour _____

4. Building Dimensions

Height (feet) 35'9" Length (feet) 500' Width (feet) 200'

IV. Air Pollution Control Equipment:

Baghouse

Type FiltAir Receiver Model #, Serial # F15214-169M

Efficiency 99.9% $PM_{2.5}$: 99.9% and PM_{10}: 99.9%

Bag Height (feet) 7' Bag Diameter (feet) 5 3/4"

Filter Area (feet squared) 140 Blower Flow Rate (cfm) 1097

Filter Media 454g [16 oz.] polyester felt filter bags Dimensions (feet) 8.67 x 2.67 x 2.67

Discharge Area Dimensions (feet) 1.5 sq. ft.

Cleaning Mechanism (shake) (air psi) reverse air 80-90 psig

Other Data 14 bags

Scrubber

Type N/A Model #, Serial #

Efficiency

Gas Differential Pressure (psi) Liquor Differential Pressure (psi)

Liquor Flow (gpm) Discharge Area Dimensions ($feet^2$)

Gas Flow (cfm) Other Data

Cyclone

Type N/A Model #, Serial #

Efficiency $PM_{2.5}$: and PM_{10}:

Gas Flow (cfm) Discharge Area Dimensions ($feet^2$)

Other Data

Precipitator

Type N/A Model #, Serial #

Efficiency

Gas Flow (cfm) Gas Velocity (ft/sec)

Residence Time Gas Differential Pressure (psi)

Precipitation Rate (ft/sec) Discharge Area Dimensions ($feet^2$)

Other Data

Ad/Absorp

Type N/A Model #, Serial #

Efficiency

Gas Flow Gas Velocity (ft/sec)

Gas Temp (degree F) Bed Volume (ft^3)

Bed Dimensions (feet) Capacity (hours)

Contaminant (lb/day) Regeneration time (hours)

IV. Air Pollution Control Equipment:

Baghouse

Type: FiltAir Receiver
Model #, Serial #: F15214-170M
Efficiency: 99.9% $PM_{2.5}$: 99.9% and PM_{10}: 99.9%
Bag Height (feet): 3'
Bag Diameter (feet): 5.75"
Filter Area (feet squared): 419.4 sq. ft.
Blower Flow Rate (cfm): 900
Filter Media: 7.66oz./yd2 polyster spunbond
Dimensions (feet): 8.67 x 2.67 x 2.67
Discharge Area Dimensions (feet): 0.545 sq. ft.
Cleaning Mechanism (shake) (air psi): reverse air 80-90 psig
Other Data: 18 cartridges

Scrubber

Type: N/A
Model #, Serial #:
Efficiency:
Gas Differential Pressure (psi):
Liquor Differential Pressure (psi):
Liquor Flow (gpm):
Discharge Area Dimensions ($feet^2$):
Gas Flow (cfm):
Other Data:

Cyclone

Type: N/A
Model #, Serial #:
Efficiency: $PM_{2.5}$: and PM_{10}:
Gas Flow (cfm):
Discharge Area Dimensions ($feet^2$):
Other Data:

Precipitator

Type: N/A
Model #, Serial #:
Efficiency:
Gas Flow (cfm):
Gas Velocity (ft/sec):
Residence Time:
Gas Differential Pressure (psi):
Precipitation Rate (ft/sec):
Discharge Area Dimensions ($feet^2$):
Other Data:

Ad/Absorp

Type: N/A
Model #, Serial #:
Efficiency:
Gas Flow:
Gas Velocity (ft/sec):
Gas Temp (degree F):
Bed Volume (ft^3):
Bed Dimensions (feet):
Capacity (hours):
Contaminant (lb/day):
Regeneration time (hours):

Other Type _____ Model #, Serial # _____

Efficiency _____

Gas Flow (cfm) _____ Discharge Area Dimensions (feet) _____

Other Data _____

V. Additional Information:

1. Attach Related Information on Chemicals or Materials that will be emitted. (MSDS Sheets, Company Information, etc.)

   Note: Indicate how much quantity are used per MSDSs

   ☐ Yes ☑ No, if not why? There are no chemicals or materials being emitted

2. Fugitive Dust Control Plan (Attach if Necessary)
3. Attach Operation and Maintenance Manual of Pollution Control Equipment.

   ☑ Yes ☐ No, if not, why? _____
4. Attach Vendor Information or Manufacturer's Instructions on Pollution Control Equipment.

   ☑ Yes ☐ No, if not, why? _____

APPLICANT: I hereby certify that the information contained in this application, including supplemental forms and data, when required, is, to the best of my knowledge, complete and correct. I also agree to all fees for processing this permit and grant permission for YRCAA staff to enter the premises for inspection.

Signature Steven M. Mitchell Date 4.30.25

Title ~~EHS Manager~~ Director of Environmental, Health & Safety Date 4.30.25

Name and Title of Individual Filling out Form:

Name (print) Steven Mitchell- EHS Manager

Signature Steven M. Mitchell

Name and Title of Contact Person, if Different than Above:

Name _____

Title _____

Name and Title of the Responsible Official for the permit, if Different than Above:

Name _____

Title _____

Yakima Regional Clean Air Agency
INSTRUCTIONS FOR PERMIT APPLICATION

Use this sheet as a checklist to determine when your application is substantially complete.

☛ Each PERMIT APPLICATION for the construction, installation or establishment of a new air contaminant source, or modification of existing air pollution source or control equipment or permit, needs to be accompanied by the following information to be considered complete:

Included	N/A	
☐	☐	Process flow sheets and equipment layout diagrams.
☐	☐	Control equipment manufacturer, model number, size, serial numbers (for each piece of control equipment).
☐	☐	Quantify average and maximum hourly throughput values, average yearly totals, and maximum concentrations for each pollutant.
☐	☐	Applicant's calculation of the kinds and amounts of emissions for each emission point, materials handling operation or fugitive category (both controlled and uncontrolled).
☐	☐	Plot plan including identification of proposed emission points to the atmosphere, distance to property boundaries, height of buildings and stack height above ground level.
☐	☐	Identification of raw materials and/or product specifications (physical and chemical properties) and typical ranges of operating conditions as related to each emission point (toxic air contaminants require a separate summary); Material Safety Data Sheets (MSDS) should be included in the PERMIT APPLICATION for all compounds used.
☐	☐	Identification of the methods/equipment proposed for prevention/control of emissions to the atmosphere.
☐	☐	Information sufficient to demonstrate the ability of the emission controls proposed as being consistent with those provided in the applicable regulations (BACT/NSPS/RACT/NESHAPS/LAER analysis). See attached worksheet for typical layout of BACT analysis information.
☐	☐	The kinds and amounts of emission offset credits proposed for assignment when operations are within a non-attainment boundary (see WAC 173-400-120 and 131).
☐	☐	Estimates of the proposed project ambient impact under average and least favorable conditions where pertinent to PSD (WAC 173-400-720) or Toxic Air Pollutants (WAC 173-460) requirements.
☐	☐	Additional information, evidence, or documentation as required by the Board of Directors, or the Control Officer, to show that the proposed project will meet federal, state and local air pollution control regulations.
☐	☐	For applications that include equipment that has previously been approved, authorized or registered, a lapse is considered to have occurred if the registration fees are delinquent for more than one calendar year or the source has not operated within five years prior to the receipt of any required PERMIT APPLICATION (WAC 173-400-110).
☐	☐	Applications that include previously approved or authorized equipment require that additional information regarding previous owners or approvals be provided so that YRCAA records can be updated. Equipment registered and/or approved for a given company cannot be authorized without a legal name change, purchase of company or equipment, or a legal contract or subcontract to do business with or for the approved source. Responsibility for operation of authorized equipment rests with the registered source.
☐	☐	All applications need to be accompanied with a completed SEPA checklist or SEPA determination. YRCAA may process the SEPA determination, if no other agency has done it. In this case a SEPA checklist with the proper fees must be submitted with the NSR application.

☛ The application transmittal shall conform to YRCAA review requirements wherever possible as detailed in the General Regulations for Air Pollution Sources (WAC 173-400).

☛ Each drawing, document, or other form of transmittal considered by the applicant to be proprietary and confidential must be suitably identified as confidential in red ink, and signed and dated by the applicant or its agent. Be aware that YRCAA follows the requirements in 40 CFR 2 for determination of confidentiality. YRCAA may not process company sensitive information as confidential.

☛ Orders of Approval (to construct, modify, or install) are issued for specific equipment or processes described in the application. Changes to the processes or control equipment are not allowed without new source review (Permit Application and Permit) if these changes result in an emission of a different type or an increase in emissions (WAC 173-400-110). Process equipment changes that result in decreased emissions require notification to YRCAA.

☛ The SIC code is identified as the four digit major group classification in the 1987 Standard Industrial Code Classification Manual listing of SIC codes can be obtained for free from the internet.

☛ Mail or deliver in person the completed application package to:

Yakima Regional Clean Air Agency
186 Iron Horse Court, Suite 101
Yakima, WA 98901-2303

☛ **Application fees must accompany application for the application to be considered complete. An invoice will be sent out for the Engineering review after final decision on the application. Make checks payable to "Yakima Regional Clean Air Agency" or "YRCAA".**

☛ **The PERMIT APPLICATION package submitted must be complete. All applications are screened for completeness before processing. Applicants submitting incomplete application packages will be notified of their incomplete status and may result in a delay in processing the application.**

Yakima Regional Clean Air Agency

PERMIT APPLICATION / NEW SOURCE REVIEW

BACT ANALYSIS WORKSHEET

Facility Name: Paragon Films Inc. **Date:** 5.9.2024

CONTROL ALTERNATIVE	EMISSIONS [lbs/hr] & [tons/yr]	EMISSIONS REDUCTION (a) [tons/yr]	INSTALLED CAPITAL COST (b) [$]	TOTAL ANNUALIZED COST (c,g) [$]	AVERAGE COST EFFECTIVENESS OVER BASELINE (d) [$/ton]	INCREMENTAL COST EFFECTIVENESS (e) [$/ton]	ENERGY INCREASE OVER BASELINE (f) [mmBtu/yr]	TOXICS IMPACT [Yes/No]	ADVERSE ENVIRONMENTAL IMPACT [Yes/No]
1)									
2)									
3)									
4)									
5) Uncontrolled Baseline (worst case - no controls)									

(a) Emissions reduction over baseline control level.
(b) Installed capital cost relative to baseline.
(c) Total annualized cost (capital, direct, and indirect) of purchasing, installing, and operating the proposed control alternative. A capital recovery factor approach using a real interest rate (i.e., absent inflation) is used to express capital costs in present-day annual costs.
(d) Average cost effectiveness over baseline is equal to total annualized cost for the control option divided by the emissions reductions resulting from the uncontrolled baseline.
(e) The optional incremental cost effectiveness criterion is the same as the average cost effectiveness criteria except that the control alternative is considered relative to the next most stringent alternative rather than the baseline control alternative.
(f) Energy impacts are the difference in total project energy requirements with the control alternative uncontrolled baseline expressed in equivalent millions of Btus per year.
(g) Assumptions made on catalyst life may have a substantial affect upon cost effectiveness.

Notes:

The number of alternatives to be evaluated will vary depending on application.
Values for each variable should be provided as they are applicable. Use N/A if not applicable.
Emission rates are the expected or predicted emission rates.
Calculations should provide for a range of alternatives.
Emissions reduction should use estimated efficiency if actual efficiency is unknown - should so state.
Attach worksheets as necessary to substantiate above values.

WASHINGTON STATE ENVIRONMENTAL POLICY ACT
DETERMINATION OF NONSIGNIFICANCE
CITY OF UNION GAP, WASHINGTON
February 26, 2024

PROJECT DESCRIPTION: The City of Union Gap Department of Public Works and Community Development has received an application from Jacob Liddicoat on behalf of Paragon Films to add an additional eight (8) storage silos to the current twelve (12) existing on site. Each silo is approximately 7,300 cu. ft. An initial environmental review (SEPA #201204672) was conducted on the project site for 8 silos, so this environmental review will consider the additional 4 that have been added, as well as the proposed 8 additional future silos.

PROPONENT: City of Union Gap

LOCATION: 915 Rose St. Union Gap WA, Parcel # 191206-42403

LEAD AGENCY: City of Union Gap, Washington

FILE NUMBER: 2024.0016.SE0002

DETERMINATION: The City of Union Gap, as lead agency for this proposal, after reviewing a completed environmental checklist and other information on file with the lead agency, has determined that, as mitigated, the project will not have a probable significant adverse impact on the environment, and an environmental impact statement will not be required under RCW § 43.2lC.030(2)(c). While an initial threshold determination of DNS was made, comments received have determined that an MDNS will be appropriate for this project. The information relied upon in reaching this determination is available to the public upon request at the City of Union Gap Community Development Department.

FINDINGS:

A. **Location:** The project is located at 915 Rose St. in Union Gap, Parcel # 191206-42403.

B. **Comprehensive Plan:** The proposed action is consistent with the goals and policies of the Union Gap Comprehensive Plan

C. **Zoning:** The location is in the Light Industrial zoning district

D. **Critical Areas:** No critical areas are present on the site.

E. **Water Quality:** Development must comply with Chapter 14.40 of the UGMC and current edition of the Eastern Washington Stormwater Management Manual. Runoff treatment is required to treat the collected stormwater prior to infiltration. Best Management Practices required to remove pollutants stormwater shall be provided for review during design. Development must comply with all UIC program requirements.

F. **Previous Environmental Information:** A previous SEPA review was done on the site for the initial 8 silos. This can be found in SEPA file # 201204672.

G. **Comments:** The comment period for the proposed action lasted from January 30, 2024 to February 13, 2024. One comment was received:

1. Washington State Department of Ecology:

   "Thank you for the opportunity to comment on the Mitigated Determination of Non-Significance for Paragon Films Silos. We have reviewed the documents and have the following comment.

Water Quality

Stormwater

The site has an NPDES industrial stormwater general permit to manage their stormwater discharges. Please update your stormwater pollution prevention plan to include new equipment, materials, impervious surfaces and stormwater drainages associated with the new silos.

For questions, please contact Kevin Dolan, 509-480-1277 or kevin.dolan@ecy.wa.gov, with questions about this permit.

Response: The stormwater pollution prevention plan will be updated to reflect the construction and maintenance of additional silos at this site.

H. **Mitigation:** The requirement of Finding G. 1. shall be a mitigation of this determination.

a. The stormwater pollution prevention plan shall be updated to include new equipment, materials, impervious surfaces, and stormwater drainage associated with this project.

CONCLUSION:

This MDNS is issued under WAC § 197-11-350; the lead agency will not act on this proposal for 14 days from the date below.

SEPA Responsible official: Dennis Henne
Phone: (509) 575-3638
Address: P.O. Box 3008, 102 W. Ahtanum Road, Union Gap, Washington 98903

Date: February 26, 2024 Signature: Dennis Henne

You may appeal this determination to Union Gap Hearing Examiner, at P.O. Box 3008, 102 W. Ahtanum Road, Union Gap, Washington 98903, no later than 5:00 pm on March 11, 2024 (14 days) by completing an appeal application form and payment of the appeal fee. You should be prepared to make specific factual objections. Contact the City of Union Gap Community Development Department to read or ask about the procedures for SEPA appeals.