

United States Environmental Protection Agency  
Region 10, Office of Air, Waste and Toxics  
AWT-107  
1200 Sixth Avenue  
Seattle, Washington 98101

Permit Number: R10NT500200  
Issued: Final 120406  
AFS Plant I.D. Number: 53-077-00075

## Non-Title V Air Quality Operating Permit

is issued in accordance with the provisions of 40 CFR § 49.139 and applicable rules and regulations to

### Pace International, LLC

for operations in accordance with the conditions listed in this permit, at the following location:

Yakama Reservation  
5661 Branch Road (Main Facility), Latitude: 46.405, Longitude: 120.498  
3800 Branch Road (Cascade Facility), Latitude: 46.405, Longitude: 120.458  
Wapato, WA 98951

Plant Manager: Edmund Huang,  
Vice President of Manufacturing,  
Development, and Labs  
Pace International LLC  
1101 Western Avenue, Suite 807  
Seattle, WA 98104  
Phone: 206-331-4782; Fax: 509-849-3149  
Email: [edh@paceint.com](mailto:edh@paceint.com)

Facility Contact: Jennifer Shukis  
Manufacturing Supervisor and  
Environmental Compliance Officer  
Pace International LLC  
1101 Western Avenue, Suite 807  
Seattle, WA 98104  
Phone: 206-331-4770, Fax: 509-849-3149  
Email: [jennifers@paceint.com](mailto:jennifers@paceint.com)

A technical support document that describes the bases for conditions contained in this permit is also available.



Richard Albright, Director  
Office of Air, Waste and Toxics  
U.S. EPA, Region 10

Date

12/4/06

## 1. General Conditions

- 1.1. The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Air Act.
- 1.2. Compliance with the terms of this permit does not relieve or exempt the permittee from compliance with other applicable federal, tribal, state, or local laws or regulations.

## 2. Potential to Emit Limits and Work Practice Requirements

- 2.1. Boiler Fuel Sulfur Limit. The permittee shall not use in boilers 6 and 7 any liquid fuel that contains more than 0.05% by weight sulfur as determined using ASTM Methods D2880-03, D4294-03, or D6021-96 (re-approved 2001), as appropriate.
- 2.2. Shield Brite Volatile Organic Compound (VOC) Mass Balance Emission Limit. VOC emissions from all Shield Brite materials shall not exceed 80 tons per year as determined on a rolling 12-month basis by calculating the emissions (tons) for each month and adding the emissions calculated for the previous 11 months. VOC emissions shall be calculated monthly using Equation 1 below for all VOC-containing materials, where: the "Mass Balance VOC Losses" is a mass balance (in tons) performed using Equation 2 below (described in more detail in the accompanying Technical Support Document); the "Excluded VOC Purchased" includes (in tons) all organic compounds purchased during the month that are not included in the Mass Balance VOC Losses.

Equation 1: Monthly VOC emissions =  
[(Mass Balance VOC Losses) + (Excluded VOC Purchased x 0.26)]

Equation 2: Mass Balance VOC Losses =  
(Starting VOC Inventory + VOC Purchased) - (VOC Sold + Ending VOC Inventory)

- 2.3. Facility-Wide Hazardous Air Pollutant (HAP) Emission Limit. Aggregated facility-wide HAP emissions shall not exceed 8 tons per year as determined on a rolling 12-month average basis by calculating the HAP emissions (tons) for each month and adding the HAP emissions calculated for the previous 11 months. HAP emissions shall be calculated monthly by assuming that all HAPs in HAP-containing materials purchased each month are emitted.
- 2.4. Cascade Facility Baghouse Requirement. The permittee shall operate the Cascade facility baghouse as described in the non-Title V permit application at all times that the Cascade process operates. The permittee shall maintain the baghouse in good operating condition and according to manufacturer specifications.

## 3. Monitoring and Recordkeeping Requirements

- 3.1. Boiler Fuel Sulfur Records. The permittee shall obtain, record and keep records of the percent sulfur by weight from the vendor for each purchase of fuel or, if the vendor is unable to provide percent sulfur by weight information for each purchase of fuel, obtain a representative grab sample for each purchase and analyze the sample using the appropriate ASTM methods in Condition 2.1 above. For each grab sample taken and analyzed, record the date, sampling method, analysis method and results.

3.2. VOC Emissions Records. The permittee shall track, calculate and record monthly and rolling 12-month VOC emissions records for Shield Brite materials including the following:

- 3.2.1. VOC emissions determined using Equation 1;
- 3.2.2. VOC emissions determined by mass balance using Equation 2;
- 3.2.3. Inventory balances at the beginning and end of each month for VOC-containing products used in the monthly mass balance;
- 3.2.4. Inventory balances at the beginning and end of each month for VOC-containing raw materials used in the monthly mass balance;
- 3.2.5. Purchases of VOC-containing raw materials used in the monthly mass balance;
- 3.2.6. Sales of VOC-containing products and raw materials used in the monthly mass balance;
- 3.2.7. Purchases of VOC-containing raw materials excluded from the monthly mass balance;
- 3.2.8. VOC content (fraction) by volume in each VOC-containing material used in the monthly mass balance, including the source or basis of VOC content information;
- 3.2.9. Specific gravity of each VOC-containing material used in the monthly mass balance;
- 3.2.10. Material Safety Data Sheets for each VOC-containing material;
- 3.2.11. All calculations and assumptions.

3.3. HAP Emissions Records. The permittee shall track, calculate and record monthly and rolling 12-month facility-wide HAP emission records including the following:

- 3.3.1. Purchases of all HAP-containing materials.
- 3.3.2. HAP content (fraction) by volume in each HAP-containing material purchased, including the source or basis of HAP content information;
- 3.3.3. All calculations and assumptions.

3.4. Cascade Facility Baghouse Records. The permittee shall record all time periods when the Cascade process operates without the baghouse in operation. For each time period record, include the date, time and reason for non-operation of the baghouse.

3.5. Records Retention. All required records shall be kept on site for a period of five years and shall be made available to EPA upon request.

#### **4. Reporting Requirements**

4.1. No later than February 15 of each year, the permittee shall submit to EPA, along with the annual registration required by 40 CFR § 49.138(e)(2), an annual report containing:

- 4.1.1. A summary of all vendor fuel sulfur and grab sample records required by Condition 3.1 above for the previous calendar year. Included in the summary shall be the date and results of each fuel purchase and grab sample.
- 4.1.2. VOC emissions records required in Condition 3.2 above for the previous calendar year, except those records required in Condition 3.2.10.
- 4.1.3. HAP emissions records required in Condition 3.3 above for the previous calendar year.
- 4.1.4. A summary of the Cascade process baghouse operation records required in Condition 3.4 above for the previous calendar year.