



## Notice of Construction Application

A notice of construction permit is required before installing a new source of air pollution or modifying an existing source of air pollution. This application applies to facilities in Ecology's jurisdiction. Submit this application for review of your project. For general information about completing the application, refer to Ecology Forms ECY 070-410a-g, "Instructions for Ecology's Notice of Construction Application."

Ecology offers up to two hours of free pre-application assistance. We encourage you to schedule a pre-application meeting with the contact person specified for the location of your proposal, below. If you use up your two hours of free pre-application assistance, we will continue to assist you after you submit Part 1 of the application and the application fee. You may schedule a meeting with us at any point in the process.

Upon completion of the application, please enclose a check for the initial fee and mail to:

Department of Ecology  
Cashiering Unit  
PO Box 47611  
Olympia, WA 98504-7611

For Fiscal Office Use Only: 0299-  
3030404-B00-216-001-000404

Check the box for the location of your proposal. For assistance, call the appropriate office listed below:

Check box	Ecology Permitting Office	Contact
<input type="checkbox"/>	<b>Chelan, Douglas, Kittitas, Klickitat, or Okanogan County</b> Ecology Central Regional Office (509) 575-2490	Lynnette Haller (509) 457-7126 <a href="mailto:lynnette.haller@ecy.wa.gov">lynnette.haller@ecy.wa.gov</a>
<input checked="" type="checkbox"/>	<b>Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Stevens, Walla Walla, or Whitman County</b> Ecology Eastern Regional Office (509) 329-3400	Karin Baldwin (509) 329-3452 <a href="mailto:karin.baldwin@ecy.wa.gov">karin.baldwin@ecy.wa.gov</a>
<input type="checkbox"/>	<b>San Juan County</b> Ecology Northwest Regional Office (206) 594-0000	David Adler (425) 649-7267 <a href="mailto:david.adler@ecy.wa.gov">david.adler@ecy.wa.gov</a>
<input type="checkbox"/>	<b>For actions taken at Kraft and Sulfite Paper Mills and Aluminum Smelters Only</b> Ecology Industrial Section (360) 407-6900	James DeMay (360) 407-6868 <a href="mailto:james.demay@ecy.wa.gov">james.demay@ecy.wa.gov</a>
<input type="checkbox"/>	<b>For actions taken on the US Department of Energy Hanford Reservation Only</b> Ecology Nuclear Waste Program (509) 372-7950	Lilyann Murphy (509) 372-7951 <a href="mailto:lilyann.murphy@ecy.wa.gov">lilyann.murphy@ecy.wa.gov</a>

461Y0251

AUG 13 2025

\$1,190.00

Check the box below for the fee that applies to your application.

**New project or equipment:**

- ☐ **\$1,904: Basic project** initial fee covers up to 16 hours of review.
- ☐ **\$12,614: Complex project** initial fee covers up to 106 hours of review.

**Change to an existing permit or equipment:**

- ☐ **\$357: Administrative or simple change** initial fee covers up to 3 hours of review. Ecology may determine your change is complex during the completeness review of your application. If you project is complex, you must pay the additional xxx before we will continue working on your application
- ☒ **\$1,190: Complex change** initial fee covers up to 10 hours of review
- ☐ **\$350flat fee:** Replace or alter control technology equipment under WAC 173-400-114. Ecology will contact you if we determine your change belongs in another fee category. You must pay the fee associated with that category before we will continue working on your application.

**Read each statement below, then check the box next to it to acknowledge that you agree.**

- ☒ The initial fee you submitted may not cover the cost of processing your application. Ecology will track the number of hours spent on your project. If the number of hours Ecology spends exceeds the hours included in your initial fee, Ecology will bill you \$119 per hour for the extra time.
- ☒ You must include all information requested by this application. Ecology may not process your application if it does not include all the information requested.
- ☒ Submittal of this application allows Ecology staff to visit and inspect your facility.

## **Part 1: General Information**

### **I. Project, Facility, and Company Information**

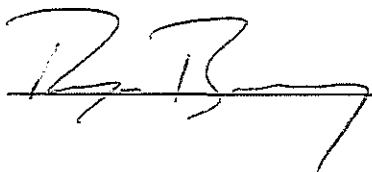
1. Project Name: Mild Steel Welding Permit Limit Modification
2. Facility Name: Walla Walla Foundry
3. Facility Street Address:  
405 Woodland Avenue, Walla Walla, WA, 99362
4. Facility Legal Description: Abbreviated Legal Description: 30-7-36 (SURVEY 1998-04110) TAX 16F IN 19-7-36; ALSO TAX 34 IN 30-7-36
5. Company Legal Name (if different from Facility Name):  
Walla Walla Foundry, INC.
6. Company Mailing Address (street, city, state, zip)  
405 Woodland Avenue, Walla Walla, WA, 99362

### **II. Contact Information and Certification**

1. Facility Contact Name (who will be onsite): Ryan Bagley
2. Facility Contact Mailing Address (if different than Company Mailing Address):  
-same-

3. Facility Contact Phone Number: 509.520.6328
4. Facility Contact E-mail: ryan@wallawallafoundry.com
5. Billing Contact Name (who should receive billing information):  
Scott Jacobson
6. Billing Contact Mailing Address (if different Company Mailing Address):  
-same-
7. Billing contact Phone Number: 509.522.2114
8. Billing Contact E-mail: scott@wallawallafoundry.com
9. Consultant Name (optional – if 3<sup>rd</sup> party hired to complete application elements):  
Marie Piper
10. Consultant Organization/Company: Cascade Environmental Management
11. Consultant Mailing Address (street, city, state, zip):
12. Consultant Phone Number: 360.672.0088
13. Consultant E-mail: marieatcascade@gmail.com
14. Responsible Official Name and Title (who is responsible for project policy or decision making):  
Ryan Bagley, Operations Manager
15. Responsible Official Phone: 509.520.6328
16. Responsible Official E-mail: ryan@wallawallafoundry.com
17. Responsible Official Certification and Signature:

I certify that the information on this application is accurate and complete.

Signature:  Date: 8/5/2025

## Part 2: Technical Information

The Technical Information may be sent with this application form to the Cashiering Unit, or may be sent directly to the Ecology regional office with jurisdiction along with a copy of this application form.

For all sections, check the box next to each item as you complete it.

### III. Project Description

- ☒ Written narrative describing your proposed project.
- ☒ Projected construction start and completion dates.
- ☒ Operating schedule and production rates.
- ☒ List of all major process equipment and manufacturer and maximum rated capacity.
- ☒ Process flow diagram with all emission points identified.
- ☒ Plan view site map.
- ☒ Manufacturer specification sheets for major process equipment components
- ☒ Manufacturer specification sheets for pollution control equipment.
- ☐ Fuel specifications, including type, consumption (per hour and per year) and percent sulfur.

### IV. State Environmental Policy Act (SEPA) Compliance

Check the appropriate box below.

- ☒ SEPA review is complete. Include a copy of the final SEPA checklist and SEPA determination (e.g., DNS, MDNS, and EIS) with your application.
- ☐ SEPA review has not been conducted:
  - ☐ If review will be conducted by another agency, list the agency. You must provide a copy of the final SEPA checklist and SEPA determination before Ecology will issue your permit.  
Agency reviewing SEPA: \_\_\_\_\_
  - ☐ If the review will be conducted by Ecology, fill out a SEPA checklist and submit it with your application. You can find a SEPA checklist online at <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-document-templates>

### V. Emissions Estimations of Criteria Pollutants

Does your project generate criteria air pollutant emissions? ☒ Yes ☐ No

If yes, please provide the following information regarding your criteria emissions in the application.

- ☒ The names of the criteria air pollutants emitted (i.e., NO<sub>x</sub>, SO<sub>2</sub>, CO, PM<sub>2.5</sub>, PM<sub>10</sub>, TSP, VOC, and Pb)
- ☒ Potential emissions of criteria air pollutants in tons per hour, tons per day, and tons per year (include calculations) Note: PM emissions increase of less than 26 lbs/year.
- ☐ If there will be any fugitive criteria pollutant emissions, clearly identify the pollutant and quantity

### VI. Emissions Estimations of Toxic Air Pollutants

Does your project generate toxic air pollutant emissions? ☐ Yes ☒ No

If yes, please provide the following information regarding your toxic air pollutant emissions in your application.

- ☐ The names of the toxic air pollutants emitted (specified in WAC 173-460-150<sup>1</sup>)
- ☐ Potential emissions of toxic air pollutants in pounds per hour, pounds per day, and pounds per year (include calculations)
- ☐ If there will be any fugitive toxic air pollutant emissions, clearly identify the pollutant and quantity

#### **VII. Emission Standard Compliance**

- ☐ Provide a list of all applicable new source performance standards, national emission standards for hazardous air pollutants, national emission standards for hazardous air pollutants for source categories, and emission standards adopted under Chapter 70A.15 RCW.

Does your project comply with all applicable standards identified? ☐ Yes ☐ No

#### **VIII. Best Available Control Technology**

- ☐ Provide a complete evaluation of Best Available Control Technology (BACT) for your proposal.

#### **IX. Ambient Air Impacts Analyses**

Please provide the following:

- ☐ Ambient air impacts analyses for Criteria Air Pollutants (including fugitive emissions)
- ☐ Ambient air impacts analyses for Toxic Air Pollutants (including fugitive emissions)
- ☐ Discharge point data for each point included in air impacts analyses (include only if modeling is required)
  - ☐ Exhaust height
  - ☐ Exhaust inside dimensions (ex. diameter or length and width)
  - ☐ Exhaust gas velocity or volumetric flow rate
  - ☐ Exhaust gas exit temperature
  - ☐ The volumetric flow rate
  - ☐ Description of the discharges (i.e., vertically or horizontally) and whether there are any obstructions (ex., raincap)
  - ☐ Identification of the emission unit(s) discharging from the point
  - ☐ The distance from the stack to the nearest property line
  - ☐ Emission unit building height, width, and length
  - ☐ Height of tallest building on-site or in the vicinity and the nearest distance of that building to the exhaust
  - ☐ Whether the facility is in an urban or rural location

Does your project cause or contribute to a violation of any ambient air quality standard or acceptable source impact level? ☐ Yes ☒ No

To request ADA accommodation, call Ecology at (360) 407-6800, 711 (relay service), or (877) 833-6341 (TTY)

<sup>1</sup> <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-460-150>

## Part 2: Technical Information

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### Written narrative describing your proposed project.

The Walla Walla Foundry (WWF) is currently permitted for 50 lbs/month of electrode usage for mild steel welding. WWF is seeking a permit modification to allow for 4800 lbs/year at Woodland, resulting in a total of 26.23 pounds of uncontrolled PM emissions per year.

### Projected construction start and completion dates

Upon approval.

### Operating schedule and production rates

4800 lb electrode per year.

### List of all major process equipment and manufacturer and maximum rated capacity.

### Process flow diagram with all emission points identified.

### Plan view site map.

### Manufacturer specification sheets for major process equipment components

### Manufacturer specification sheets for pollution control equipment

No APC for mild steel welding.

Hi Jenny,

As we talked about a few months ago, Walla Walla Foundry would like to increase the permitted amount of mild steel welding (PM emissions) for their facility. They aren't required to use APC for mild steel welding and the uncontrolled emissions for the proposed increased throughput of mild steel electrode would be less than 26 pounds per year. Currently the permit allows for 50 pounds of electrode per year with 0.27 lbs PM, uncontrolled. WWF would like to be permitted for up to 4800 pounds per year for the facility.

**Steel Welding Permit Mod - August 2025**

W	4800	Weight (pounds) of electrode used in one year
EF	0.01	EF - fumes from TIG/MIG welding (lb fume/lb rod)
FCF	0.5464	Fume Correction Factor
APC	99.9%	Fume Extractor/Push Pull Filtration APC %

Annual Emissions =  $W * EF * FCF * Ci * (1 - APC)$

$PM_{10}$  lb/yr = 2.62E-02 **26.23 uncontrolled PM**

Also, attached is an NOC application form. Let us know if you need anything else. (This is a very small permit modification request and it does not trigger any NSR or other thresholds that I'm aware.)

I hope your summer has been great!

Thank you for your time and help with this.

Marie

Marie E. Piper  
Principal Engineer



316 SE Pioneer Way, #294  
Oak Harbor, WA 98277

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[MarieatCascade@gmail.com](mailto:MarieatCascade@gmail.com)