PUGET SOUND
Clean Air Agency

Puget Sound Clean Air Agency

Notice of Construction No. **12215**

HEREBY ISSUES AN ORDER OF APPROVAL TO CONSTRUCT, INSTALL, OR ESTABLISH

Registration No. **18467**

Date

DRAFT

Canyon Creek Cabinet Company (CCCC) will install a new line that consists of two automatic spray booths, two automatic sanding machines, two manual sanding tables, two automatic part cleaners, two vertical ovens and two horizontal ovens and one part flipper. To support the new system, two small (<2 MMBtu per hour heat input each) natural gas-fired boilers will be installed to provide heat for the four ovens in the system.

The proposed project will also require a baghouse to control particulate matter emissions from the sanding and parts cleaner equipment. For the proposed flat line system, a 45,000 cfm Superior Filter Model #P14-494-12 with 7,410 square feet of filter media resulting in a 6.07:1 air-to- cloth ratio is proposed.

No increase in permitted emissions or changes in coating constituents is proposed. The new line will be as efficient as the current line.

OWNER

Sumitomo Forestry USA
16726 Tye St SE
Monroe, WA 98272

INSTALLATION ADDRESS

Canyon Creek Cabinet Co
16726 Tye St SE
Monroe, WA 98272

THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

1. Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Clean Air Agency to the applicant to install or establish the equipment, device or process described hereon at the INSTALLATION ADDRESS in accordance with the plans and specifications on file in the Engineering Division of the Puget Sound Clean Air Agency.
2. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.
3. In the booths permitted under this Order, spray application of any individual material containing di-2-ethylhexyl phthalate (DEHP), lead, Chrome (VI), nickel, or cadmium is prohibited. If the chemical is not listed on the SDS or other data sheet it will be presumed the coating material does not contain the chemical.
4. The VOC content (as defined by 40 CFR 51.100) of all finishing materials applied in the booths permitted under this order shall not exceed 4.1 pounds per gallon (less water and exempt compounds) as applied as a 12-month rolling volume-weighted average. The owner or operator shall demonstrate compliance using one of the following methods:
    a. Maintain records of the VOC content of each coating to demonstrate that all coatings, as applied, individually meets the VOC limit; or
    b. Within 30 days of the end of each month, calculate and record the total VOC emissions (less water and exempt compounds) from coatings and divide by the total gallons of all VOC-containing material applied during the rolling 12-month period. Records must clearly show the 12-month rolling volume-weighted average VOC content in pounds per gallon. Purchase records may be used as a surrogate for coating application.

5. The volatile hazardous air pollutant (VHAP) content of all finishing materials applied in the booths permitted under this order shall not exceed 1.0 pound per pound of coating solids as applied, as a 12-month rolling volume-weighted average. The owner or operator shall demonstrate compliance using one of the following methods:

   a. Within 30 days of the end of each month, calculate the average VHAP content for all finishing materials as a 12-month rolling mass-weighted average using Equation 1 of 40 CFR 63.804(a)(1); or
   b. Use compliant finishing materials according to the following criteria:
      i. Demonstrate that each stain, sealer, and topcoat has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner;
      ii. Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner; and
      iii. Demonstrate that each washcoat, basecoat, and enamel that is formulated onsite by thinning another finishing material is formulated using a finishing material containing no more than 1.0 lb VHAP/lb solids and a thinner containing no more than 3.0 percent VHAP by weight.

6. The owner or operation shall use manufacturer's formulation data, product safety data sheets, environmental data sheets or other manufacturer's provided data of each finishing material to determine the mass of organic HAP and the volume fraction of coating solids in all finishing materials used.

7. Tert-butyl acetate (CAS # 540-88-5) used and applied in the booths permitted under this Order must not exceed 5100 pounds during any consecutive 12-month period. Within 30 days of the end of each month, calculate the total amount of tert-butyl acetate used and applied based on usage and the associated chemical constituent compositions (Tert-butyl acetate content). Orders or purchase transactions of materials used in the booths may be used in lieu of usage information.

8. Naphthalene (CAS # 91-20-3) used and applied in the booths permitted under this Order must not exceed 89 pounds during any consecutive 12-month period. Within 30 days of the end of each month, calculate the total amount of naphthalene used and applied based on usage and the associated chemical constituent compositions (naphthalene content). Orders or purchase transactions of materials used in the booths may be used in lieu of usage information.

9. Spray-coating of material shall be confined to agency approved booths equipped with a filter system that at all times covers the openings of the exhaust plenum including the edges of the filter bank. Compliance demonstration with this requirement must at a minimum include daily inspections of the filter system on days when the booths are in operation. Operation of the booths must cease if it is determined the filter system does not completely cover the openings of the exhaust plenum and corrective action must be taken prior to operation of the booths.

10. The air from the spray booths shall be operated so that all exhaust air passes through dry filters with a minimum initial overspray arrestance of 98%. Overspray arrestance must be determined using the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1 procedure and substituting the synthetic test dust feed with a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure with an air flow rate across the filter of 150 feet per minute. A system that complies with 40 CFR Part 63, Subpart HHHHHH meets this requirement.

11. All spray application of material must be applied with an air-assisted airless spray gun, electrostatic applicator, or high-volume low-pressure (HVLP) spray gun or the Model 40-25 Easy ASB Airless tested

on 3.23.2022Alternative spray technology must meet a minimum transfer efficiency of 65 percent. The procedure used to demonstrate a spray technology's transfer efficiency must be equivalent to South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002." A plan describing the test procedure must be developed and submitted to the Agency 30 days prior to conducting any spray technology transfer efficiency test.

12. The booths permitted under this order must be equipped with an operable gauge to indicate the pressure drop across the exhaust filtration system. The acceptable pressure drop range shall be established using the manufacturer's recommendations, specifications, or instruction; or shall be established based on operator experience to maintain filter integrity and compliance with Conditions #9 and #10. The established pressure drop minimum and maximum values must be clearly marked on or nearby the gauge.

13. The owner or operation shall inspect the spray booth at least once per day of operation, with each inspection to include the following:
    a. Check of differential pressure across the filters in the spray booth to ensure operation within the acceptable range, and
    b. Visual checks of filter condition and fit to ensure complete coverage over the exhaust plenum.
14. The booths permitted under this order shall always be operated within the acceptable pressure drop range across the exhaust filter bank. Compliance demonstration with this requirement must at a minimum include daily pressure drop inspections on days when the booths are in operation. Operation of the booths must cease when the pressure drop across the filter bank deviates from the established range and corrective action must be taken prior to operation of the booth.

15. The owner or operation shall conduct visual inspections of the spray booth ductwork for corrosion and holes at least once per week when the unit is operating; of fans to ensure proper fan operation; and of all exhaust points for paint deposition. Correct problems identified by these inspections within 24 hours of initial discovery or discontinue spray coating operations. Paint deposition shall be removed from exhaust points within 10 days of initial discovery.

16. All materials from which VOCs can evaporate to the open air shall be disposed of in closed containers or bags. This includes rags, wipes, paper towels, and absorbents that become laden, soaked, or covered in VOC-containing material.

17. All containers used for mixing, storing, or disposing VOC-containing materials shall be kept closed at all times except during the following situations:
    a. Cleaning of containers.
    b. Depositing of materials in containers or removing of materials from containers.

Dust Collection:

18. All exhaust from the sanding and parts cleaner equipment shall be vented through the Superior Filter Model #P14-494-12.

19. There shall be no visible emissions from the Superior Filter Model #P14-494-12.

20. Emissions from the Superior Filter Model #P14-494-12 serving the sanding and parts cleaner equipment shall not exceed 0.005 gr/scf.

21. The owner or operator shall install and maintain a pressure drop measurement device, such as a manometer or Magnehelic, to measure the pressure drop between the inlet and outlet of the dust collector serving the sander. The acceptable pressure drop range for the effective operation of the dust collector shall be clearly marked on or nearby the gauge.

22. Once per day the dust collector is in operation, the facility shall record the pressure drop across the exhaust filters and determine if it is in the acceptable range. If the pressure drop is not within the acceptable range, the facility shall shut down the dust collector and the equipment vented to the dust collector upon discovery of the problem until corrective action has been taken.

23. When the dust collector is not in operation, the owner or operator must verify and record that emission units in the finish room are also not in operation.

24. The owner or operator shall conduct visual inspections of the dust collector and associated ductwork at least once per week for visible emissions and fallout. Records shall be maintained of these inspections. If visible emissions or fallout are observed, the facility shall either initiate repairs or shut down the dust collector and the equipment vented to the dust collector until corrective action has been taken.

Recordkeeping:

25. The following records shall be kept onsite and up-to-date, and be made readily available to Agency personnel upon request at all times:
    a. Safety Data Sheets (SDS) and formulation data for each VOC-containing material used inside the booths, including VOC content (minus water and exempt compounds) in pounds per gallon or gram per liter.
    b. Documentation to demonstrate compliance with filter requirements in Condition 10.
    c. Documentation to demonstrate compliance with spray gun requirements in Condition #11.
    d. The Operation and Maintenance (O&M) plan. The O&M plan shall be developed and implemented per Agency's Regulation I. At a minimum, the following shall be included in the O&M plan:
        i. Filter maintenance.
        ii. Filter inspection procedures.
        iii. Procedures to correct operation of the booths when the pressure drop across the filter bank deviates from the established range.

26. The following records shall be kept onsite and up-to-date for at least two years from the date of generation, and be made readily available to Agency personnel upon request:
    a. Documentation of the total amount in pounds of Tert-butyl acetate applied and used in the booths permitted under this Order during any consecutive 12-month period.
    b. Documentation of the total amount in pounds of naphthalene applied and used in the booths permitted under this Order during any consecutive 12-month period.
    c. Results of inspections to determine compliance with filter requirements in Condition #9.
    d. Documentation of pressure drop across the filter system as required by Condition #9.
    e. Documentation verifying any corrective action taken to maintain compliance with this Order of Approval.

27. Upon startup of the production on the automated spray line, the owners and operators will have 120 days to transition production to the new line and disable and remove from service the pater noster, denibbing station and six dry spray booths. CCCC is to notify PSCAA when production starts. The total plant wide daily production shall not exceed the 498 spray finished cabinets per day during this transition period. Canyon Creek shall inform PSCAA once the pater noster and six dry spray booths are disabled from being operational, and the transition period has ended.

28. At the end of the 120 day period cited in condition 27, NOC No 9690 dated Oct 25, 2007 will be cancelled and superseded.

Order of Approval for NC No. 12215

APPEAL RIGHTS

Pursuant to Puget Sound Clean Air Agency's Regulation I, Section 3.17 and RCW 43.21B.310, this Order may be appealed to the Pollution Control Hearings Board (PCHB). To appeal to the PCHB, a written notice of appeal must be filed with the PCHB and a copy served upon Puget Sound Clean Air Agency within 30 days of the date the applicant receives this Order.

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Carl Slimp
Reviewing Engineer

John Dawson
Engineering Manager