Puget Sound Clean Air Agency

Notice of Construction No. **12196**

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

Registration No. **11683**

Date

ICS-WA is planning to replace some of the existing equipment with new or refurbished units as follows:

• Replace the existing drum furnace controlled by an afterburner with a refurbished drum furnace with an afterburner from another ICS facility. (Manufactured by North American, Models 4425-5 Nature Gas Burner and 4425-7 Nature Gas Burner

• Replace the existing shot blaster controlled by a baghouse with a new shot blaster with a baghouse. (Baghouse Make FARR APC Model Hemipleat Filter GS8)

• Replace the existing spray guns in the paint booth with seventeen (17) new guns. Spray booth enclosure will also be replaced with a 866 cubic feet Kremlin Airmix 290. Emissions from the booth will duct to the existing RTO for control.

• Replace the drum curing oven with a new drum curing oven (manufactured by Epcon) which will be controlled by the existing RTO.

OWNER	INSTALLATION ADDRESS
Industrial Container Services - WA, LLC **7152 1st Ave S** **Seattle, WA 98108**	**Industrial Container Services - WA, LLC** **7152 1st Ave S** **Seattle, WA 98108**

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.

DRUM RECLAMATION FURNACE WITH AFTERBURNER

3. The maximum rate of production shall the drum processing rates in the reclamation furnace shall not exceed 60 industrial drums per hour. The owner/operator shall limit the total amount of drums processed to 780,000 total drums/year.
4. The drum burn out furnace shall be limited to 601,912 drums per year.
5. The owner or operator shall not cause or allow visible emissions other than uncombined water from the drum reclamation furnace afterburner stack.
6. The owner or operator shall use only natural gas as fuel in the drum reclamation furnace.
7. All drums processed in the reclamation furnace shall be 'drip dry' and shall contain no more than 1 inch of

residue.

8. No drums shall be processed in the reclamation furnace unless the reclamation furnace afterburner chamber temperature is at least 1,700 degrees F.

9. An electronic interlock shall automatically shutdown the drum staging conveyor if the afterburner chamber temperature drops below 1,700 degrees F.

10. The afterburner chamber temperature shall be continuously recorded whenever drums are being processed in the reclamation furnace, and such records shall be retained for at least 2 years for inspection by Agency staff.

11. The monthly (and 12-month rolling total) emissions from the afterburner shall be estimated by multiplying the hourly emission rates measured during the source test by the hours of operation of the drum reclamation furnace afterburner.

12. Operational emission limits:
    a. Total particulate matter emissions shall not exceed 0.05 gr/dscf corrected to 7% oxygen from the drum reclamation furnace afterburner as measured by USEPA reference methods 1, 2, 3A, 4, and 5 as modified by Puget Sound Clean Air Agency Board Resolution 540 dated August 11, 1983, or other approved methods.
    b. Opacity shall not exceed 5% opacity for a period or periods aggregating more than 3 minutes during any one hour as measured by WDOE Method 9A.
    c. NOx shall not exceed 85 ppm dry corrected to 7% oxygen as determined by USEPA reference method 7E or other approved methods
    d. CO shall not exceed 400 ppm dry corrected to 7% oxygen as determined by USEPA reference method 10 or other approved methods

13. An initial source test shall be conducted within 90 days of start up of the Drum Furnace with Afterburner to determine compliance with condition 12. This shall be shown by the average of 3 60-minute runs for each pollutant and opacity. A source test shall be done every five calendar years after to ensure compliance.

DRUM CURING OVEN CONTROLLED BY RTO

14. The Regenerative Thermal Oxidizer (RTO) shall have a destruction efficiency of at least 98% or an outlet concentration of no more than 40 ppm as propane, as determined by EPA Method 25A or other agency approved method.

15. The RTO combustion chamber temperature shall be continuously monitored and recorded whenever the paint curing oven is in operation, and such records shall be retained for at least 2 years for inspection by Agency staff.

16. The RTO combustion chamber temperature shall be at least 1600 degrees F (1-hour average) or the temperature recorded during the compliance test (whichever is lower) at all times when the paint curing oven is in operation.

17. Opacity shall not exceed 5% opacity for a period or periods aggregating more than 3 minutes during any one hour as measured by WDOE Method 9A.

18. A source test shall be conducted within 90 days of the installation of the paint booth and drum curing oven to determine compliance with conditions 14 and 17 of this Order. A source test shall be done every five calendar years after to ensure compliance.

SPRAY PAINT BOOTH

19. The monthly (and 12-month rolling total) emissions from the paint spray booths shall be estimated based on the results of a source test defined by condition 14, which shall be conducted within 90 days of the installation of the RTO in accordance with a test plan approved by the Agency.

20. The spray booths shall meet the permanent enclosure criteria as determined by EPA method 204.

21. Install and maintain a pressure drop measurement device, such as a manometer or Magnehelic, to measure the pressure drop across each exhaust filter per spray booth. Within 30 days after the installation of the spray booth, the acceptable pressure drop range for the effective operation of the filters shall be clearly marked on or nearby the gauge.

22. For spray booth operation, the owner or operator shall use high volume, low pressure (HVLP), Air Assisted Airless, LVLP, electrostatic or spray equipment approved by South Coast Air Quality Management District for their application and capable of achieving equivalent or better transfer efficiency than the HVLP spray guns

23. The owner or operator shall not use coatings that contain compounds of chromium, cadmium, lead, manganese or nickel as determined by the SDS or other documentation provided by the manufacturer or supplier

24. The owner or operator shall use best management practices in its spray coating operation, including but not limited to their gun cleaning method. Spray guns shall be cleaned by one of the following:
    a. An enclosed spray gun cleaning system that is kept closed when not in use;
    b. Unatomized discharge of solvent into a paint waste container that is kept closed when not in use;
    c. Disassembly of the spray gun and cleaning in a vat that is kept closed while not in use; or
    d. Atomized spray into a paint waste container that is fitted with a device designed to capture atomized solvent emissions.

25. At no time may discharged solvent from equipment be atomized into the open air. The organic solvent used for cleanup of equipment, including solvent rags and paper, must be collected and returned to closed containers after use. Those containers used for the storage and disposal of organic solvent shall be kept closed except when these containers are being cleaned or when materials are being added.

26. Inspect each spray booth bench 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 bench to ensure operation within the acceptable range
    b. Visual checks of filter condition and fit to ensure complete coverage over exhaust plenum
    If the spray booth bench is operating outside of the acceptable differential range or without complete filter coverage, discontinue spray coating until corrective action has been taken.

SHOT BLASTER CONTROLLED BY BAGHOUSE

27. There shall be no visible emissions or fallout from the baghouse.

28. Total particulate matter emissions shall not exceed 0.05 gr/dscf per PSCAA Regulation II Section 9.09.

29. The owner or operator shall install and maintain a gauge to measure the pressure drop across the baghouse exhaust filters. Within 90 days after beginning operations, the acceptable range for the gauge shall be clearly marked on or nearby the gauge.

30. Once during each week the baghouse is used, the owner or operator shall perform inspections that shall include a check of the exhaust for visible emissions and fallout, and a check of the pressure drop across the filters.

31. If visible emissions, fallout, or abnormal pressure drop are observed, the owner or operator shall both investigate the cause and initiate repairs or shut down the processes vented to the baghouse within 24 hours of the observation. The result shall be recorded in a designated Operation & Maintenance (O&M) log.

32. Records of all weekly inspections and corrective actions shall be maintained for at least two years and made available to Puget Sound Clean Air Agency personnel upon request.

33. The shot blaster installed in 1988 shall be removed prior to the start up of the new shot blaster.

34. This Order of Approval No. 12196 hereby cancels and supersedes Order of Approval No. 9500 dated September 22, 2006

Complaint Response Log

35. The owner and/or operator shall keep a log of any and all odor complaints received and any corrective action taken as a result of these odor complaints.

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.

Carl Slimp	John Dawson
Reviewing Engineer	Engineering Manager