Notice of Construction (NOC) Worksheet

PUGET SOUND
Clean Air Agency

Source: Bellmont Cabinets Company	**NOC Number:** 12309
Installation Address: 13610 52nd St E STE 300 | Sumner, WA 98390	**Registration Number:** 28982
Contact Name: Andrew Congdon	**Contact Email:** acongdon@bellmontcabinets.com
Applied Date: 12/07/2022	**Contact Phone:** (253) 321-3034
Engineer: Carl Slimp	**Inspector:** Manolo Zaldivar

A. DESCRIPTION

For the Order of Approval:
Facility-wide synthetic minor emission limit of VOC emissions

Additional Information (if needed):

This review is for a regulatory order under PSCAA Reg I 3.03(f):
"When an applicant requests a federally enforceable regulatory order to limit the potential to emit any air contaminant or contaminants pursuant to WAC 173-400-091, or requests a modification to such an order, the Control Officer or a duly authorized representative may issue such order consistent with the requirements of WAC 173-400-091 and 173-400-171 and Section 3.03(e) above. Regulatory orders issued pursuant to this section are effective the day the Control Officer or representative approves the order and may be appealed to the Pollution Control Hearings Board pursuant to Section 3.17 of Regulation I and RCW 43.21B.310."

During the permitting process of NOC 11290, it was determined that the facility had a potential to emit an estimated 126 tons per year from that project alone, and also put in an application to be registered as a title V facility. Bellmont Cabinet Company has installed an RTO, lowering the actual total plant emissions of VOC's to under 100 tons per year.

Bellmont is also asking to the following changes to NOC Order of Approval No. 12172.
Requested New Permit Condition 3:

> The owner /operator shall limit the facility-wide emissions of Volatile Organic Compounds (VOC) to less than 98 tons during any 12 consecutive rolling months.

Requested Revision to Current permit Condition 38:

> The owner /operator shall maintain readily available Safety Data Sheets (SDS) and product formulation data for each individual material containing a VOC, TAP or VHAP as necessary to show compliance with Conditions 3, 16 and 19.

Bellmont is also requesting a relaxation of testing requirements to relax EPA 204 testing on the CEFLA enclosures to match the 3 year (within 24 to 39 months of the prior test) schedule required of the RTO source testing.

Facility

Bellmont is currently a Title V facility that primarily performs spray coating and finishing for wood cabinets. The facility also performs cabinet assembly including laminate wood cabinets. The facility consists of four main areas, woodworking, finishing, assembly and shipping.

Bellmont manufactures custom cabinets at the Sumner facility. The facility operates the following process equipment:

- One automated spray line consisting of one spray cabin, one integrated sanding machine, and one integrated dust collector. Two automated spray lines. Each spray line is rated at 7,100 ACFM each (totaling 21,300 ACFM). Emissions from all three (3) Cefla spray chambers are controlled with one Model 300 (32,000 SCFM) Anguil Regenerative Thermal Oxidizer.
- Seven open-face spray booths, six with an exhaust flow rate of 20,000 cfm and one with an exhaust flow rate of 15,000 cfm, to be used for finishing of wood cabinets. The booths are equipped with a dry filtration system.
- One baghouse rated at 72,000 cfm controlling particulate matter emissions from shapers, table saws and sanders.
- Four (4) Riello (Model FS15D) exempt natural gas-fired ovens for drying cabinets when the ambient temperature is below 72 °F, rated at 0.9 million BTUs per hour (MMBtu/hr) each;
- Miscellaneous, exempt sawing equipment and handheld equipment for sanding operations.

Order of Approval 12172 covers the spray booths, spray machines and LMC dust collector listed above. The four ovens and miscellaneous equipment are exempt from filing a NOC with PSCAA per Regulation I, Section 6.03(c)(1), (40) and (42).

Permit History

The facility was first permitted in 2006 for 8 spray booths and 2 spray lines and some dust control equipment as well as an emissions cap for hazardous air pollutants and VOC under NOC 9385. In 2015 Bellmont removed their VOC emission cap and became a Title V source, the cap on hazardous air pollutants remains. This was shown in NOC 10871, which canceled and superseded NOC 9385

Bellmont submitted an NOC application to the agency in November 2016 for the addition of a third automated spray line using solvent based coatings (NOC 11290). This NOC superseded NOC 9384. The proposed coatings would have resulted in emissions of naphthalene well above the Acceptable Source Impact Levels (ASILs) set in WAC 173-460. The applicant decided not to pursue the original coating materials and proposed a second set of coatings with much lower TAP emissions but much higher VOC emissions. While the VOC content of second set of coatings were not particularly high, the coating usage required for the project resulted in a VOC PTE estimate of 126 tons VOC/yr for this project alone. The Agency proposed BACT for that project was equivalent to an emission reduction of 98%, or emissions equivalent to 2.5 tons VOC per year. At that time the emission reduction could be achieved through installation of a Regenerative Thermal Oxidizer (RTO) which is demonstrated to be both technologically feasible, economically feasible, and has an emission reduction of 98% that is achieved in practice. The BACT determination was based on a top-down BACT analysis submitted by the applicant that reported a cost per ton value of $3,836/ton VOC removed. The Agency determined that the reported cost per ton value for the RTO was cost effective/economically feasible, technically feasible, and did not have

significant adverse environmental impacts. The applicant determined that they would not like to pursue the project as proposed in the summer of 2017.

On January 31, 2018, Bellmont submitted a new proposal (NOC 11546) for the same automated spray line to use water-based coatings. The third coating line was approved under NOC 11546 in May of 2018 for water-based coatings only and replaced NOC 11290

On February 18, 2020, Bellmont received a NOC (NOC 11855) that included one automated spray line consisting of one spray cabin, one integrated sanding machine, and one integrated dust collector. Two automated spray lines. Each spray line is rated at 7,100 ACFM each (totaling 21,300 ACFM). Emissions from all three (3) Cefla spray chambers are controlled with one Model 300 (32,000 SCFM) Anguil Regenerative Thermal Oxidizer. Seven open-face spray booths, six with an exhaust flow rate of 20,000 cfm and one with an exhaust flow rate of 15,000 cfm, to be used for finishing of wood cabinets. The booths are equipped with a dry filtration system. It included one baghouse rated at 72,000 cfm controlling particulate matter emissions from shapers, table saws and sanders. This Order of Approval contains facility-wide emission limits for hazardous air pollutants (HAP), with specific limits for napthalene. This NOC canceled and superceded NOC 11546

On September 3rd, 2021, Bellmont has received its latest NOC (NOC 12172), which includes one automated spray line consisting of one spray cabin, one integrated sanding machine, and one integrated dust collector. Two automated spray lines. Each spray line is rated at 7,100 ACFM each (totaling 21,300 ACFM). Emissions from all three (3) Cefla spray chambers are controlled with one Model 300 (32,000 SCFM) Anguil Regenerative Thermal Oxidizer. This NOC canceled and superceded NOC 11855

B. DATABASE INFORMATION

No new equipment will be added under this OA.

New NSPS due to this NOCOA?	**No**	**Applicable NSPS: NA**	**Delegated? NA**
New NESHAP due to this NOCOA?	**No**	**Applicable NESHAP: NA**	**Delegated? NA**
New Synthetic Minor due to this NOCOA?	**Yes**		

The applicant provided an explanation of several NSPS and NESHAP that might apply with the previous title V application. Those descriptions are found below:

40 CFR 60, Subpart EE - Standards of Performance for Surface Coating of Metal Furniture
NSPS Subpart EE applies to facilities that have a metal furniture surface coating operation and use organic coating. Bellmont performs surface coating to wood cabinets and shelving and a metal bracket for a shelving product.. Bellmont only uses one type of aerosol spray paint can for the metal bracket surface coating and its usage is well below the exemption threshold of 3,842 liters (as applied) per year (approximately 1,015 gallons per year). Therefore, per the usage exemption threshold (40 CFR 60.310(c)), the metal surface coating operation using aerosol cans at Bellmont is exempt from the

provisions under Subpart EE. However, in order to ensure the exemption status, the purchase or inventory records are kept at the facility for at least two years.

40 CFR 63, Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations

NESHAP Subpart JJ applies to the wood furniture or wood furniture components manufacturing facilities, which are major sources under 40 CFR Part 63. The cabinet doors meet the definition of wood furniture components under Subpart JJ. However, the Sumner facility is a HAP area source under 40 CFR Part 63 and is not subject to NESHAP Subpart JJ.

40 CFR 63, Subpart MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products

NESHAP Subpart MMMM sets forth emission standards for facilities that applies surface coating of any miscellaneous metal parts and products, except as defined under 40 CFR 63.3881(c). Bellmont performs surface coating to wood cabinets and a type of metal bracket of shelving products, which would be regulated under NESHAP Subpart JJ if the facility were a major source of HAP. Bellmont is not a major source for HAPs and not subject to Subpart MMMM does not apply to the Sumner facility.

40 CFR 63, Subpart NNNN - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Large Appliances

NESHAP Subpart NNNN applies to HAP major facilities that applies coating to large appliance parts or products, as defined under 40 CFR 63.4181. Bellmont is not a major facility for HPA and does not process large appliances as defined by 40 CFR 63.4181.

40 CFR 63, Subpart PPPP – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products

NESHAP Subpart PPPP applies to HAP major facilities that performs surface coating operations of plastic parts and products. Bellmont is not a major source for HAPs.

40 CFR 63, Subpart QQQQ - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products

NESHAP Subpart QQQQ applies to wood building products surface coating sources which are major sources under 40 CFR Part 63. Per 40 CFR 63.4681(c)(2), the surface coating associated with cabinet manufacturing which would be subject to Subpart JJ if the facility were a major source of HAP and not subject to Subpart QQQQ. Furthermore, as discussed earlier, the Sumner facility is an area source of HAP. Therefore, Subpart QQQQ does not apply to the Sumner facility.

40 CFR 63, Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

NESHAP Subpart HHHHHH applies to the HAP area sources that performs at least one of the following operations per 40 CFR 63.11169:

- Paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), Chemical Abstract Service number 75092, in paint removal processes;
- Autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations;

- Spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.

Bellmont performs surface coating using Krylon spray aerosol cans to a type of metal bracket associated with the shelving products, which is considered metal part under this subpart. However, the Krylon spray paint does not contain any compounds of the target HAP described above based on the Safety Data Sheet (Appendix B). Therefore, Subpart HHHHHH does not apply to the Sumner facility.

C. NOC FEES AND ANNUAL REGISTRATION FEES

NOC Fees:

Fees have been assessed in accordance with PSCAA Regulation I, 3.03(e) for Regulatory Orders: per Regulation I 3.03(e): "When a regulatory order is requested by an applicant, the Agency shall assess a fee of $4,000 to cover the costs of processing and issuing a regulatory order under this section. The Agency shall also assess a fee equal to the cost of providing public notice in accordance with Section 3.03(b) of this regulation. These fees shall be due and payable within 30 days of the date of the invoice and shall be deemed delinquent if not fully paid within 90 days of the invoice."

Fee Description	Cost	Amount Received (Date)
Reg I 3.03(e)	$ 4,000	
Publication costs		
Initial fee received		$ 4,000 (12/8/2022)
Public comment fee received		
Total		

*Publication fees to be invoiced following public comment period

Registration Fees:
Registration fees are assessed to the facility on an annual basis. Fees are assessed in accordance with Regulation I, Section 5.07. The 2021 Invoice is shown below for reference:

PUGET SOUND
Clean Air Agency

Puget Sound Clean Air Agency
1904 Third Avenue, Suite 105
Seattle, WA 98101-3317
Tax ID: 91-0823558
206.689.4072

Invoice for Year 2021 Operating Permit Fees

Bill To:
Pacific Crest Industries, Inc. dba Bellmont Cabinets Company **PO Box 2050** **Sumner, WA 98390** **Attention: Accounts Payable**

Invoice Date:	Invoice #:
November 20, 2020	20210032
Due Date:	**Terms:**
January 04, 2021	Net 45 Days
Facility ID (Permit #):	
28982	

Site Address: ***Pacific Crest Industries, Inc. dba Bellmont Cabinets Company***
13610 52nd St E, Sumner, WA 98390

The annual operating permit fee is required by Washington State law and Puget Sound Clean Air Agency's Regulation I. Your fees are based on your NAICS code and your actual emissions during 2019.

Facility Fees and Applicable Regulations			Charges
Facility Fee for Operating Permit Sources. Reg I, 7.07(b)(1)(iii)			**$ 28,600.00**
NAICS 337110 -- Wood Kitchen Cabinet and Countertop Manufacturing			
Emission Surcharges - Reg I, 7.07(b)(2)	**Tons in 2019**	**Per Ton**	
HAP (Hazardous Air Pollutants)	6	$ 60	$ 360.00
VOC (Volatile Organic Compounds)	117	$ 60	$ 7,020.00
			$ 7,380.00
Fee Totals			
Operating Permit Fee (After February 18, 2021, the fee is $42,480.00).			**$ 35,980.00**
The Total Fee is due by January 04, 2021. If unpaid after February 18, 2021, an additional delinquent fee of $6,500.00 will be applied. The delinquent fee is equal to 25% of the Operating Permit Fee, not to exceed $6,500 (Reg I, 7.07(b)).			
WA State Department of Ecology surcharge, Reg I, 7.07(d)			**$ 820.43**
For further information regarding the WDOE surcharge, please call 1-360-407-7530.			
TOTAL FEE			**$ 36,800.43**

Pay online and confirm payment: www.pscleanair.gov/annualfee
This copy is for your records. If paying by check, please mail the yellow copy with your payment.
Your canceled check is your receipt.

11/06/2020

Applicability		
Regulation I	Description	Note
Section 5.03(3)	25.0 tons of carbon monoxide (CO), nitrogen oxides (NOx), particulate matter (PM2.5 or PM10), sulfur oxides (SOx), or volatile organic compounds (VOC)	
Section 5.03(4)(D)	Sources with spray-coating operations subject to Section 9.16 of Regulation I	
Section 5.03(6)(A)	Sources with any of the following particulate control equipment having a rated capacity of greater than or equal to 2,000 cfm (≥10" diameter inlet):	Baghouse
Annual Registration Fee		
Regulation I	Description	Fee
Section 5.03(3)	25.0 tons of carbon monoxide (CO), nitrogen oxides (NOx), particulate matter (PM2.5 or PM10), sulfur oxides (SOx), or volatile organic compounds (VOC)	TBD
Section 5.07 (c)	Except as specified in Section 5.07(d) and (e) of this regulation, registered sources shall be assessed a fee of $1,150, plus the following fees	$1,150
Section 5.07(c)(2)	Sources subject to a federally enforceable emission limitation as specified in Section 5.03(a)(2) or meeting the emission thresholds specified in Section 5.03(a)(3) of this regulation shall be assessed $2,300	$2,300
	Total =	$ 3,450 + TBD

D. STATE ENVIRONMENTAL POLICY ACT (SEPA) REVIEW

State Environmental Policy Act (SEPA) review was not conducted for the issuance of this Regulatory Order. In this case, the Regulatory Order does not include the establishment of any new source of emissions. The SEPA determinations issued under NOCs 11769, 10733, 11479, 9544, and 9575 reviewed the equipment comprising the facility.

Regulation I, Article 2. The SEPA review is undertaken to identify and help government decision-makers, applicants, and the public to understand how a project will affect the environment. A review under SEPA is required for projects that are not categorically exempt in WAC 197-11-800 through WAC 197-11-890. A new source review action which requires a NOC application submittal to the Agency is not categorically exempt.

A new SEPA determination is not required because the potential impacts from this project were reviewed under SEPA by PSCAA under the previous NOC permit 11855 issued for the facility and included below.

Document #	Issuing Agency	Date Issued	Description
11855	PSCAA	2/18/2020	One automated spray line consisting of one spray cabin, one integrated sanding machine, and one integrated dust collector. Two automated spray lines. Each spray line is rated at 7,100 ACFM each (totaling 21,300 ACFM). Emissions from all three (3) Cefla spray chambers are controlled with one Model 300 (32,000 SCFM) Anguil Regenerative Thermal Oxidizer. Seven open-face spray booths, six with an exhaust flow rate of 20,000 cfm and one with an exhaust flow rate of 15,000 cfm, to be used for finishing of wood cabinets. The booths are equipped with a dry filtration system. One baghouse rated at 72,000 cfm controlling particulate matter emissions from shapers, table saws and sanders. This Order of Approval contains facility-wide emission limits for hazardous air pollutants (HAP).

11855-dns.pdf

E. TRIBAL CONSULTATION

On November 21, 2019, the Agency's Interim Tribal Consultation Policy was adopted by the Board. Criteria requiring tribal consultation are listed in Section II.A of the policy and include establishment of a new air operating permit source, establishment of a new emission reporting source, modification of an existing emission reporting source to increase production capacity, or establishment or modification of certain equipment or activities. In addition, if the Agency receives an NOC application that does not meet the criteria in Section II.A but may represent similar types and quantities of emissions, the Agency has the discretion to provide additional consultation opportunities.

This project does not meet any of the criteria for consultation listed in Section II.A of the Agency's Interim Tribal Consultation Policy.

F. EMISSION ESTIMATES

Facility-wide Emissions

This facility has exceeded 100 tons per year of VOC's in 2017, 2018, 2019 and 2020. Through the use of an RTO to control the automated spray booths and tracking emissions through use, the VOC emissions for 2021 were shown to be 46 tons per year. However, this was due to a year where production was less than 8,760 hours. This enforceable limit would ensure that even with an increase of production, the facility would not exceed Title V thresholds.

Summary of VOC Emissions from the Sumner Facility

Reporting Year	Reported Annual VOC Emissions (tons)
2018	137
2019	117
2020	131
2021	46

The facility shared the assumptions leading to scaling up the emissions.

Table 2. Simple Potential to Emit Calculation

Variable	Value	Units
2021 Actual VOC Emissions	46.36	tons/year
Current Spray Coating Operations	16 5 52 4,160	hrs/day days/week weeks/year hrs/year
Maximum Spray Coating Operations	8,760	hrs/year
Potential VOC Emissions	**97.62**	**tons/year**

A more detailed Emission inventory estimate can be found from NOC 11855, when the CEFLA automated spray lines were permitted.

The table 2 groups total VOC emissions from all units. PSCAA estimated apportioned emissions to the CEFLA lines controlled by the RTO, the remaining 7 open spray booths and hand-held aerosol application. NOC 11855, condition 16, has put a limit on the CEFLA Lines 1, 2 and 3 to 12 tons of VOC during any consecutive 12-month period. A source test was performed on the RTO controlling the CEFLA lines on May 6, 2021. During this test, the VOC's at the RTO outlet was measured at 0.5 lbs/hr and 9.2 ppmvd. The unit has a limit of 20 ppm or 99% destruction efficiency, whichever is more lenient. If this test was used as an indicator for the year, that would be 8,760 hrs/year * 0.5 lbs/hr = 4,380 lbs/year, or 2.19 tons/year. If this was conservatively doubled to 18.4 ppmvd or 1 lbs/hr of

VOC, still meeting the 20 ppmvd Limit, that would still only be 4.4 tons/year, easily meeting the rolling 12 ton/year limit.

This would leave 86 tons year of possible VOC emissions from the 7 open face spray booths permitted under NOC. These emissions are tracked through the use of SDS, purchasing records and material balances.

In the AOP application submitted on March 6, 2015, it is noted that Belmont uses handheld aerosol spray cans. It was conservatively estimated at 1,015 gallons per year, but in practice is closer to 17 gallons and less than 200 cans. At this quantity, this is exempt from requiring an NOC and would not be subject to NSPS Subpart EE. These emissions would still count towards the emission inventory and should be tracked in the same way as paint used in the spray booths.

G. LIMIT EVALUATION

The federally enforceable limits for this regulatory order must meet the requirements of WAC 173-400-091. WAC 173-400-091(3) requires that any order issued include monitoring, recordkeeping and reporting requirements sufficient to ensure that the source or stationary source complies with the conditions of the order.

EPA has provided guidance for federally enforceable permit limits in several documents which were utilized in the development of the limits, compliance demonstration, monitoring recordkeeping and reporting requirements of this Order (PDF copies are located in the "NOC Worksheet References" sub-folder of this project folder).

- Options for Limiting the Potential to Emit (PTE) of a Stationary Source Under Section 112 and Title V of the Clean Air Act (Act), 1/25/1995
- Guidance on Enforceability Requirements for Limiting Potential to Emit through SIP and §112 Rules and General Permits, 1/25/1995
- Approaches to Creating Federally-Enforceable Emissions Limits, 11/3/1993
- EPA comments on Lockwood Regional Landfill March 29, 2011

Limits

The applicant proposed a limit based on scaling up production with emission factors linked to tracking the amount of VOC's used as well as reductions from the RTO controlling the CEFLA lines 1, 2 and 3. After installing the RTO, the yearly emissions dropped from 131 tons in 2020 to 46 tons in 2021. This was also as a result of operating 16 hours/day, 5 days/week. If this was scaled up 4,160 hours per year to 8,760, the applicant predicts that this would scale up to 97.62 tons/year. This assumes the materials would scale up evenly, as well as consistent emission reduction from the RTO, which may not be the case.

Per EPA guidance (example from EPA comments on Lockwood Regional Landfill March 29, 2011 which can be found in the project folder file "March 29 2011 Lockwood Landfill" PDF) "EPA encourages a 5-10% buffer between the permitted emission limits and the federal threshold". A 10% buffer (90 ton/12 month rolling period) will be used for this synthetic minor emission limit because compliance is to be determined on a monthly basis (12-month rolling)calculated with a mass balance with the ability to use a facility specific emission factors from stack testing conducted once every three years to the material used in the CEFLA lines. While this monitoring structure does not determine compliance as frequently as

other monitoring systems (e.g. continuous emission monitoring system) this should be adequate since testing will utilize worst case (highest emission) production rates, a 10% buffer is determined to be sufficient to ensure that the facility remains below Title V permitting thresholds.
To ensure that the facility emissions remain below Title V permitting thresholds, this order will set a 90 ton/12 month rolling period of VOC. This is below the request 98 tons/year.

This order will require periodic testing of the RTO and record keeping as described in NOC 12172.

Recordkeeping and Reporting
The owner/operator shall calculate monthly emissions of VOC and HAPs using a mass balance approach, and prepare monthly records that demonstrate that annual emissions do not exceed the limits in Condition No.3. The RTO DRE can be applied to materials used in the CEFLA lines. Monthly emission calculations records must be completed by the 15th day of the following month. Records shall include the Following: (a) monthly individual HAP and the monthly total HAPs emission rate, (b) a rolling individual HAP emission and the total HAPs emission over the previous 12-month period, (c) monthly VOC emissions and (d) total VOC emissions over the previous 12-month period.

Compliance Demonstration
Bellmont has demonstrated compliance with source testing on the RTO for VOC destruction efficiency (DRE). The last DRE test was performed on May 6th, 2021 and showed a 99.01% DRE.

Capture efficiency for the CFFLA's has also been tested in 2021, 2022 and 2023.

Bellmont has also been tracking HAPs through SDS and material balance tracking. Bellmont will continue to do so, along with VOC tracking.

H. OPERATING PERMIT OR PSD

The Title V Air Operating Permit (AOP) program applicability for the entire source has been reviewed.

The facility is not a Title V air operating permit source because post project PTE remains below Title V applicability thresholds and criteria due to federally enforceable limits of the following this order. The source is considered a "**synthetic minor**".

I. AMBIENT TOXICS IMPACT ANALYSIS

As this modification does not result in any emission increase, the toxic air pollutant (TAP) emission review of NOC 11855 continues to apply. The TAP review can be found in the worksheet for NOC 11855.

J. APPLICABLE RULES & REGULATIONS

Puget Sound Clean Air Agency Regulations

SECTION 3.03 GENERAL REGULATORY ORDERS
(f) When an applicant requests a federally enforceable regulatory order to limit the potential to emit any air contaminant or contaminants pursuant to WAC 173-400-091, or requests a modification to such an order, the Control Officer or a duly authorized representative may issue such order

consistent with the requirements of WAC 173-400-091 and 173-400-171 and Section 3.03(e) above. Regulatory orders issued pursuant to this section are effective the day the Control Officer or representative approves the order and may be appealed to the Pollution Control Hearings Board pursuant to Section 3.17 of Regulation I and RCW 43.21B.310.

SECTION 5.05 (c): The owner or operator of a registered source shall develop and implement an operation and maintenance plan to ensure continuous compliance with Regulations I, II, and III. A copy of the plan shall be filed with the Control Officer upon request. The plan shall reflect good industrial practice and shall include, but not be limited to, the following:
(1) Periodic inspection of all equipment and control equipment;
(2) Monitoring and recording of equipment and control equipment performance;
(3) Prompt repair of any defective equipment or control equipment;
(4) Procedures for startup, shut down, and normal operation;
(5) The control measures to be employed to ensure compliance with Section 9.15 of this regulation; and
(6) A record of all actions required by the plan.
The plan shall be reviewed by the source owner or operator at least annually and updated to reflect any changes in good industrial practice.

SECTION 6.09: Within 30 days of completion of the installation or modification of a stationary source subject to the provisions of Article 6 of this regulation, the owner or operator or applicant shall file a Notice of Completion with the Agency. Each Notice of Completion shall be submitted on a form provided by the Agency, and shall specify the date upon which operation of the stationary source has commenced or will commence.

SECTION 9.03: (a) It shall be unlawful for any person to cause or allow the emission of any air contaminant for a period or periods aggregating more than 3 minutes in any 1 hour, which is:
(1) Darker in shade than that designated as No. 1 (20% density) on the Ringelmann Chart, as published by the United States Bureau of Mines; or
(2) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in Section 9.03(a)(1).
(b) The density or opacity of an air contaminant shall be measured at the point of its emission, except when the point of emission cannot be readily observed, it may be measured at an observable point of the plume nearest the point of emission.
(c) This section shall not apply when the presence of uncombined water is the only reason for the failure of the emission to meet the requirements of this section.

SECTION 9.09: General Particulate Matter (PM) Standard. It shall be unlawful for any person to cause or allow the emission of particulate matter in excess of the following concentrations:
Equipment Used in a Manufacturing Process: 0.05 gr/dscf

SECTION 9.11: It shall be unlawful for any person to cause or allow the emission of any air contaminant in sufficient quantities and of such characteristics and duration as is, or is likely to be, injurious to human health, plant or animal life, or property, or which unreasonably interferes with enjoyment of life and property.

SECTION 9.13: It shall be unlawful for any person to cause or allow the installation or use of any device or use of any means designed to mask the emission of an air contaminant which causes detriment to health, safety or welfare of any person.

SECTION 9.15: It shall be unlawful for any person to cause or allow visible emissions of fugitive dust unless reasonable precautions are employed to minimize the emissions. Reasonable precautions include, but are not limited to, the following:
(1) The use of control equipment, enclosures, and wet (or chemical) suppression techniques, as practical, and curtailment during high winds;
(2) Surfacing roadways and parking areas with asphalt, concrete, or gravel;
(3) Treating temporary, low-traffic areas (e.g., construction sites) with water or chemical stabilizers, reducing vehicle speeds, constructing pavement or rip rap exit aprons, and cleaning vehicle undercarriages before they exit to prevent the track-out of mud or dirt onto paved public roadways; or
(4) Covering or wetting truck loads or allowing adequate freeboard to prevent the escape of dust-bearing materials.

SECTION 9.16(c): General Requirements for Indoor Spray-Coating Operations. It shall be unlawful for any person subject to the provisions of this section to cause or allow spray-coating inside a structure, or spray-coating of any motor vehicles or motor vehicle components, unless all of the following requirements are met:
(1) Spray-coating is conducted inside an enclosed spray area;
(2) The enclosed spray area employs either properly seated paint arresters, or water-wash curtains with a continuous water curtain to control the overspray; and
(3) All emissions from the spray-coating operation are vented to the atmosphere through an unobstructed vertical exhaust vent.

REGULATION I, SECTION 9.20(a): It shall be unlawful for any person to cause or allow the operation of any features, machines or devices constituting parts of or called for by plans, specifications, or other information submitted pursuant to Article 6 of Regulation I unless such features, machines or devices are maintained in good working order.

Washington State Administrative Code

WAC 173:400-091: Voluntary limits on emissions.

(1) Upon request by the owner or operator of a new or existing source or stationary source, the permitting authority with jurisdiction over the source shall issue a regulatory order that limits the potential to emit any air contaminant or contaminants to a level agreed to by the owner or operator and the permitting authority with jurisdiction.
(2) A condition contained in an order issued under this section shall be less than the source's or stationary source's otherwise allowable annual emissions of a particular contaminant under all applicable requirements of the chapter 70.94 RCW and the FCAA, including any standard or other requirement provided for in the Washington state implementation plan. The term "condition" refers to limits on production or other limitations, in addition to emission limitations.

(3) Any order issued under this section shall include monitoring, recordkeeping and reporting requirements sufficient to ensure that the source or stationary source complies with any condition established under this section. Monitoring requirements shall use terms, test methods, units, averaging periods, and other statistical conventions consistent with the requirements of WAC 173-400-105.
(4) Any order issued under this section must comply with WAC 173-400-171.
(5) The terms and conditions of a regulatory order issued under this section are enforceable. Any proposed deviation from a condition contained in an order issued under this section shall require revision or revocation of the order.

WAC 173-400-040(3): Fallout. No person shall cause or allow the emission of particulate matter from any source to be deposited beyond the property under direct control of the owner or operator of the source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited.

WAC 173-400-040(4): Fugitive emissions. The owner or operator of any emissions unit engaging in materials handling, construction, demolition or other operation which is a source of fugitive emission:

(a) If located in an attainment area and not impacting any nonattainment area, shall take reasonable precautions to prevent the release of air contaminants from the operation.

WAC173-400-111(7): Construction limitations.

(a) Approval to construct or modify a stationary source becomes invalid if construction is not commenced within eighteen months after receipt of the approval, if construction is discontinued for a period of eighteen months or more, or if construction is not completed within a reasonable time. The permitting authority may extend the eighteen-month period upon a satisfactory showing by the permittee that an extension is justified.

K. PUBLIC NOTICE

This project meets the criteria for mandatory public notice under WAC 173-400-171(3)(k) for establishing a voluntary limit on emissions. This is due to requesting a voluntary limit on emissions for VOCs. A 30-day public comment period shall be held from DATE through Date. Notices that the draft materials were open to comment were published in the NEWSPAPER and Daily Journal of Commerce on DATE. The Agency posted the application and the draft worksheet on the Agency's website during the comment period.

L. RECOMMENDED APPROVAL CONDITIONS

Standard 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.

Facility-Wide Emission Limits:

3. The owner/operator shall limit the facility-wide emissions of Volatile Organic Compounds (VOC) to less than 95 tons during any 12 consecutive rolling months.

4. The owner/operator shall limit the facility-wide emissions of Hazardous Air Pollutants (HAP) to less than 9.9 tons of any single HAP and 24.9 tons of any combined HAPs during any 12 consecutive rolling months.

Compliance Demonstration:

5. The owner/operator shall monitor and record quantities of all purchases of coating materials including solvent on a monthly basis. The owner/operator shall maintain on-site, material safety data sheets or certified product data sheets for these coating materials.

6. The owner/operator shall calculate monthly emissions of HAPs using a mass balance approach, and prepare monthly records that demonstrate that annual emissions do not exceed the limits in Condition No.4. Monthly emission calculations records must be completed by the 15th day of the following month. Records shall include the Following: (a) monthly individual HAP and the monthly total HAPs emission rate, (b) a rolling individual HAP emission and the total HAPs emission over the previous 12-month period, (c) most recent source test and DRE for the RTO. Belmont may use the latest source test to apply the destruction efficiency to the coating used in the CEFLA lines 1, 2 and 3.

7. The owner/operator shall calculate monthly emissions of VOCs using a mass balance approach, and prepare monthly records that demonstrate that annual emissions do not exceed the limits in Condition No.3. Monthly emission calculations records must be completed by the 15th day of the following month. Records shall include the Following: (a) monthly VOC emission rate, (b) a rolling VOC emission previous 12-month period and (c) most recent source test and DRE for the RTO. Belmont may use the latest source test to apply the destruction efficiency to the coating used in the CEFLA lines 1, 2 and 3.

8. The owner/operator shall notify the Puget Sound Clean Air Agency (Attn: Permit Certification), in writing, within 30 days after the end of each 12-month period if, during that period, emissions of any individual HAP exceeds 9.0 tons, or emissions of any combination of HAPs exceed 24.0 tons, or if

total VOC's exceeds 85 tons. The report shall include emissions data for the time period for which these thresholds were exceeded.

Open –face Spray Booth Coating Operations

9. The owner/operator shall install and maintain manometers to measure the pressure drop across the exhaust filters for the spray booths. Acceptable ranges for the gauges shall be clearly marked on or nearby the gauges.

10. The owner/operator shall conduct a weekly inspection of the spray booths (on weeks that the spray booths are in use) including the following:
    a. Check of differential pressure across the filters in the spray booths to ensure operation within the acceptable range, and
    b. Visual checks of filter condition and fit to ensure complete coverage over the exhaust plenum.

11. If the spray booths are operating outside of the acceptable differential range or without complete filter coverage, the owner/operator shall discontinue spray coating upon discovery of the problem until corrective action has been taken.

12. The owner/operator shall conduct annual visual inspections of the spray booths' ductwork to ensure structural integrity (no corrosion, holes, etc.), of fans to ensure proper fan operation, and of all exhaust points on stacks to ensure no excess paint deposition. If structural or mechanical problems are noted during such inspections, the owner/operator shall correct problems identified by these inspections within 24 hours of initial discovery or discontinue spray coating operations. If excess paint deposition is discovered at any exhaust point, the owner/operator shall perform a more detailed examination of the process to determine reasons for breakthrough, and the owner/operator shall revise its Operation and Maintenance Plan to address any problems related to the breakthrough within one week of initial discovery. Excess paint deposition shall be removed from exhaust points within 10 days of initial discovery.

13. The owner/operator shall not spray any coating that exceeds 1.0 pound of volatile hazardous air pollutants (VOHAP)/pound of solids.

Open-Face Spray Booth Equipment

14. The owner/operator spray booth operation 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.

Open-Face Spray Booth Work Practices

15. The owner/operator shall use best management practices in its spray coating operation, including the collection of organic solvent used for cleanup of equipment into normally closed containers to minimize evaporation to the atmosphere, and keeping containers used for the storage and disposal of organic solvent closed except when these containers are being cleaned or when materials are being added.

Cefla 1,2,3 Spray Line Operating Conditions

16. All volatile organic compound (VOC) emissions from the 3 Cefla spray lines must be routed to a control device with a VOC destruction efficiency of 99.0%.

17. In the event that the VOC loading is not sufficient to achieve 99.0% control efficiency, the emissions from the control device must be no greater than 20 ppm at 20.9% O2 as C_1.

18. The owner/operator shall not emit more than 12 tons of volatile organic compounds (VOCs) during any consecutive 12-month period from the spray line equipment approved under this Order of Approval. This includes all materials used as part of each spray line and any cleaning material or solvent used on or in the spray line equipment. Stack emissions shall be calculated using the control efficiency as verified by the most recent source test.

19. The owner or operator shall calculate and maintain a record of VOC emissions from the equipment authorized by this Order of Approval and prepare monthly records that demonstrate that emissions do not exceed the 12-monthly rolling limit in condition 3 & 18. Emission calculation records for each month must be completed by the 30th day of the following month. Records shall include the following:

    a. Monthly total VOC emissions and the monthly total VOC emission rate (lbs/month), and

    b. Rolling total VOC emissions over the previous consecutive 12-month period.

20. The owner or operator may determine the VOC emitted each month using the amount of VOC in the coating and solvent purchased or the actual amount of coating and solvent used for the Cefla 1, 2, and 3 equipment and activities each month. The owner or operator may not subtract the amount of VOC disposed as waste from the amount of VOC purchased or used for any given month. Stack emissions shall be calculated using the control efficiency as verified by the most recent source test.

21. The owner/operator shall not emit more than 71.6 lb of Naphthalene, CAS 91-20-3, during any consecutive 12-month period from the spray lines authorized by this Order of Approval. The owner or operator shall calculate and maintain a record of the emissions from CAS 91-20-3 used in the coating lines authorized by this Order of Approval for each month and each consecutive 12-month period. Emissions shall be calculated using the following equation as verified by the most recent source test:

$$density\ of\ coating\left(\frac{lb}{gal}\right) * coating\ usage\ \left(\frac{gal}{month}\right) * \%\ of\ CAS\ 91203\ by\ weight * 1\%\ (assumes\ 99\%\ control\ efficiency) = lb/month$$

22. All spray application of material shall be confined to a spray cabin equipped with properly seated filters that cover all openings of the exhaust plenum. Both the pre-exhaust filters and exhaust filters must be properly installed at all times that the cabin is in operation.

23. The exhaust filter in the spray line authorized by this Order of Approval must meet a minimum arrestance rating of 98 percent as determined by ASHRAE Method 52.1 or other method(s)

approved by the Agency. Daily, before using the spray line, the owner or operator shall inspect the spray line and verify that the fit and condition of each exhaust filter meets manufacturer specifications.

24. The spray coating operation shall be conducted using high transfer efficiency equipment, and have a minimum transfer efficiency of 80%.

25. All spray equipment shall be cleaned in the enclosed Cefla cabin. At no time may solvent discharged from equipment be atomized into the open air or outside the Cefla cabin. All solvent reservoirs must remain completely closed except when materials are actively transferred into or out of the containers.

26. Organic solvents used for cleanup of equipment as well as solvent soaked rags and paper must be collected and returned to closed containers after every use.

27. Containers used for the storage and disposal of spray applied materials shall be kept closed except when materials are actively transferred into or out of the containers. If containers are used to collect excess materials during spray line operation, the containers must remain covered to the fullest extent possible.

Permanent total enclosure requirements for the three Cefla lines:

28. The owner/operator shall not operate any coating line unless it is equipped with a permanent total enclosure meeting the criteria in EPA Method 204 vented to the oxidizer.

29. Each coating line shall be tested every three years (within 34 to 39 months) to verify compliance with the permanent total enclosure criteria using EPA Method 204 or other agency approved method. Each compliance test shall be conducted in accordance with Puget Sound Clean Air Agency Regulation I, Section 3.07.

30. The owner/operator shall shut down the coating line until repairs are completed if any gap or gaps are present in the permanent total enclosure, that were not accounted for in the permanent total enclosure compliance demonstration. The owner/operator must record the date and time the gap or gaps in the permanent total enclosure were discovered and the steps taken to resolve and/or repair the gap or gaps.

Regenerative Thermal Oxidizer Performance Testing:

31. The owner/operator shall conduct performance tests on the Regenerative Thermal Oxidizer within 90 days after startup of the applicable equipment.

32. The owner/operator shall conduct a performance test of the Regenerative Thermal Oxidizer while operating as close to normal operation as possible unless an alternative operating condition is approved by the Agency in the performance test plan.

33. Following the initial performance test for this permit, the owner/operator shall conduct a performance test every 3 years (within 34 to 39 months) from the last respective test.

34. The initial performance test and subsequent performance tests must measure the destruction efficiency of the Regenerative Thermal Oxidizer. Additional testing may be performed to demonstrate compliance with the 20 ppm at 20.9% O2 as C_1 limit and this testing shall measure the concentrations of VOC in the exhaust stream. Additional testing may be required at the request of the Agency to ensure compliance.

35. Testing of sources for compliance with emission standards shall be performed in accordance with Regulation 1, Article 3, Section 3.07.

36. When applicable, sampling sites and velocity traverse points shall be selected in accordance with EPA Test Method 1. The gas volumetric flow rate shall be measured in accordance with EPA Test Method 2. The dry molecular weight shall be determined in accordance with EPA Test Method 3, 3A, 3B,or 3C. The stack gas moisture shall be determined in accordance with EPA Test Method 4. These methods must be performed, as applicable, during each test run.

37. VOC testing shall be conducted in accordance with EPA Test Method 25 or 25A. Testing to quantify exempt compounds shall be conducted in accordance with EPA Test Method 18. If the source chooses to quantify exempt compounds their concentrations must be measured using Method 18, and Method 25A analyzer response factors must be developed for them at the measured concentrations and stack gas conditions. The Method 25A analyzer signal must then be corrected by subtracting the exempt compound contributions. If Method 25 is used, the concentration of exempt VOC expressed as a carbon must be subtracted from the total Method 25 measured concentration of VOC as carbon.

38. The owner/operator shall submit a separate test protocol for each performance test to the Agency for review at least 30 days prior to each performance test.

39. Each performance test shall consist of at least three separate test runs with each test run being at least one hour in duration unless otherwise specified in the applicable standard. The same test method shall be conducted simultaneously for both the inlet and outlet measurements. Performance tests may only be stopped for good cause, which includes forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the owner/operator's control. Termination of a performance test without good cause after the first test run has commenced shall constitute a failure of the performance test.

Cefla 1,2,3 Spray Line Compliance Demonstration Conditions:

40. The owner/operator shall maintain readily available Safety Data Sheets (SDS) and product formulation data for each individual material containing a VOC, TAP or VHAP as necessary to show compliance with Conditions 19 and 21.

41. The owner or operator shall calculate monthly emissions of Naphthalene, CAS 91-20-3, as specified in Condition 21.

42. The owner or operator shall maintain records sufficient to verify the average arrestance rating of each exhaust filter required by Condition 23. Published filter efficiency data provided by

manufacturers, filter vendors, or laboratories may be used to demonstrate compliance with this requirement.

43. The owner or operator shall maintain records sufficient to verify that spray application equipment has been determined to achieve a minimum transfer efficiency of 80%. Verification by means of testing or published documentation from the spray gun manufacturer may be used to demonstrate compliance with this requirement.

44. The owner or operator shall install and maintain a pressure drop measurement device, such as a manometer or Magnehelic, to measure the pressure drop across the exhaust filters in the spray line. The acceptable pressure drop range, based on the most recent passing source test, shall be clearly marked on or near the gauge. The acceptable pressure drop range shall be included in the operation and maintenance plan for the line. The minimum pressure drop shall not be less than the pressure drop measured with a clean, properly installed filter.

45. Once per day the spray line 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 spray line upon discovery of the problem until corrective action has been taken.

46. The owner or operator shall maintain records of the manufacturer specifications for proper operation of the spray line.

47. The owner and operator shall maintain a daily log that documents and shows the following:
    c. Verification of each exhaust filter fit and condition as required by Condition 22.
    d. Each pressure drop recorded as required by Condition 44.
    e. Corrective actions, including date and time completed, if at any time the spray line does not meet the established pressure drop range, filter fit, or filter condition.

Finish Room Dust Collector Operating Conditions:

48. All exhaust from the Cefla 1 sanding station shall be vented through a dust collector that is in operation.

49. There shall be no visible emissions from the dust collector.

50. Emissions from the dust collector serving the sander shall not exceed 0.005 gr/scf.

51. 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.

52. 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.

53. 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. 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.

General Reporting and Recordkeeping

54. 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. Spray line filter maintenance.
    b. Spray line filter inspection procedures.
    c. Dust collector maintenance.
    d. Documentation verifying any corrective action taken to maintain compliance with this Order of Approval.
    e. Results of inspections to determine compliance with spray line filter operation as required by Condition 23 and 44.
    f. Results of inspections to determine compliance with dust collector operation as required by Condition 52.

55. The owner or operator shall notify the Agency, in writing, within 30 days of discovering an exceedance of any limitations identified in Conditions, 13, 18, and 21.

56. The owner/operator shall record and maintain the following records on-site that include date and time inspection is performed, corrective actions (when required) and person conducting the inspections:
    a. The results of weekly and annual inspections of the spray booths, including a record of the pressure drop reading measured across the exhaust filters, condition of the filters, and any corrective actions taken.
    b. Compliance with the coating restrictions such as documentation from the coating supplier that the coatings are compliant.
    c. Weekly inspection records for the dust collector condition and pressure drop readings.

57. Records to be maintained by this Order of Approval shall be kept onsite for at least five years from the date of generation, and made readily available to Puget Sound Clean Air Agency personnel upon request.

58. Upon issuance, this Order of Approval cancels and supersedes Order of Approval No. 12172.

M. CORRESPONDENCE AND SUPPORTING DOCUMENTS

N. REVIEWS

Reviews	Name	Date
Engineer:	Carl Slimp	3/8/2023
Inspector:	Manolo Zaldivar	3/8/2023
Second Review:	John Dawson	3/8/2023
Applicant Name:		