NOC Application

Safran Cabin
Marysville, WA
May 15, 2019
Terracon Project No. MP187346

Prepared for:
Safran Cabin
Marysville, Washington

Prepared by:
Terracon Consultants, Inc.
Minneapolis, Minnesota

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AGENCY USE ONLY	NOC#:	REG#:	Date Fee Pd:	Eng. Assigned:

pscleanair.org
Puget Sound Clean Air Agency

Puget Sound Clean Air Agency
1904 Third Avenue, Suite 105 | Seattle, WA 98101-3317
Phone 206-343-8800 | 206-343-7522 Fax

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NOTICE OF CONSTRUCTION APPLICATION FOR ORDER OF APPROVAL

The following information must be submitted as part of this application packet before an Agency engineer is assigned to review your project.

SECTION 1. FACILITY INFORMATION

Business Name: Safran Cabin			
Equipment Installation Address: 12806 State Avenue	City: Marysville	State: WA	Zip: 98271
Is the business registered with the Agency at this equipment installation address? ☒ Yes. Current Registration or AOP No. 17033 ☐ No, not registered ☐ Unknown			
Business Owner Name: Safran Cabin			
Business Mailing Address: 12806 State Avenue	City: Marysville	State: WA	Zip: 98271
Type of Business: Aircraft Parts and Auxiliary Equipment Manufacturing			
NAICS Code: 336413	NAICS Description: Other Aircraft Parts and Auxiliary Equipment Manufacturing		
Contact Name (for this application): Mike Pound	Phone: 360-653-2600	Email: Mike.Pound@zodiacaerospace.com	
Provide a 1-2 sentence simple description of this project: Safran is planning on routing exhaust from the application area of the Legacy process line to the existing Triton-10.95 RTO in order to capture and control more VOC and HAP emissions from the process.			

SECTION 2: REQUIRED APPLICATION PACKET ATTACHMENTS

1) **$1,150 filing fee** (nonrefundable)

check # 270938 mailing 5/15/19

☒ PAY BY CHECK – Attached and made payable to **Puget Sound Clean Air Agency**

☐ PAY BY CREDIT – Accounting technician will contact person identified below for payment information

Contact Name:	Contact Number:

2) **Detailed Project Description**

The project description must include a detailed description of the project, a list of process and control equipment to be installed or modified, a description of how the proposed project will impact your existing operations (if applicable), and measures that will be taken to minimize air emissions.

Detailed description of the proposed project included in packet?

☒ YES, attached. ☐ NO, not attached. This application is incomplete.

NOTICE OF CONSTRUCTION APPLICATION FOR ORDER OF APPROVAL

SECTION 2: REQUIRED APPLICATION PACKET ATTACHMENTS (CONT)

3) **Process flow diagram**
☒ YES, attached. ☐ NO, not attached. This application is incomplete

4) **Emission estimate.** Emission rate increases for all pollutants.
☒ YES, attached. ☐ NO, not attached. This application is incomplete.

5) **Environmental Checklist** (or a determination made by another Agency under the State Environmental Policy Act)
www.pscleanair.org/DocumentCenter/View/170
☐ YES, attached. ☒ NO, n

Courtney O'Gorman indicated this was not required to be included in this application.

6) Attach **equipment form**(s) ap
www.pscleanair.org/178/App
☐ YES, attached. ☒ NO, n

SECTION 3: PROCESS AND CONTROL EQUIPMENT (attach additional pages if necessary)

Process Equipment		Does this equipment have air pollution control equipment?	Air Pollution Control Equipment	
# of Units	Equipment Type & Design Capacity		# of Units	Equipment Type
2	Existing Legacy Application Areas	☒ Yes ☐ No	1	Existing Triton 10.95 RTO
		☐ Yes ☐ No		
		☐ Yes ☐ No		

SECTION 4: CERTIFICATION STATEMENT

I, the undersigned, certify that the information contained in this application and the accompanying forms, plans, specifications, and supplemental data described herein is, to the best of my knowledge, accurate and complete.

Signature

5-15-19
Date

Mike Pound
Printed Name

VP/GM
Title

SECTION 5: APPLICATION SUBMITTAL

☒ **EMAIL application and attachments to:**
NOC@pscleanair.org
CourtneyO@pscleanair.org

-OR-

☐ **MAIL application, payment, and attachments to:**
Puget Sound Clean Air Agency
ATTN: NOC Application Submittal
1904 3rd Ave, Suite 105 - Seattle, WA 98101

THIS SECTION FOR AGENCY USE ONLY						
Eng. Assigned (Compliance Mgr)	Eng. Rec'd (Eng)	Web description (Eng)	Completeness review (Eng)	Routed for OA Prep (Eng)	OA signed (Compliance Mgr)	OA mailed (Admin)
Date:	Date:	Date:	Date:	Date:	Date:	Date:

PROJECT DESCRIPTION

Safran Cabin is submitting this NOC Application which includes proposed changes to the facility in Marysville, WA, that would allow Safran Cabin to remain permitted as a synthetic minor source. The existing actual phenol emissions at the facility are just below major source thresholds and the proposed changes to the facility will lower phenol emissions significantly.

The major sources of phenol emissions are the two C4 lines and the Legacy process line. The existing configuration of the facility includes the Triton 10.95 RTO controlling emissions from the C4-1 line ovens and the Triton 15.95 RTO controlling emissions from the C4-2 line ovens and the Legacy process ovens. Based on the previous Method 204 capture test of the C4-1 line, it was determined that 69% of the total emissions generated from these processes are believed to be captured and controlled by the two RTOs.

A majority of the resin throughput for the C4 and Legacy processes occur in the Legacy process line. Thus, the uncaptured emissions from the Legacy line were further evaluated. The existing Legacy process starts with a honeycomb block that is placed inside one of the two Legacy resin application areas. Inside the application area, resin is applied using a flow coating process to cover the honeycomb block. There is a dedicated exhaust located in each application area that currently exhausts directly to the atmosphere. After the resin application process is complete, the honeycomb blocks are removed from the application area using a cart. Carts are used to transport blocks from the resin application room through a hallway into the oven room where the honeycomb blocks are placed into ovens. The exhaust from the ovens are controlled by the Triton 15.95 RTO.

After reviewing the most recent stack test performed for the RTOs, it was determined that the 10.95 RTO has available capacity, however the current exhaust from the Legacy application areas is greater than this available capacity. As such, Safran Cabin is proposing to minimize the size of the natural draft openings in the enclosures, reduce the exhaust flow rate, and route the exhaust from the two resin application areas into the existing 10.95 RTO. This should capture a majority of the currently uncaptured emissions from the Legacy process line.

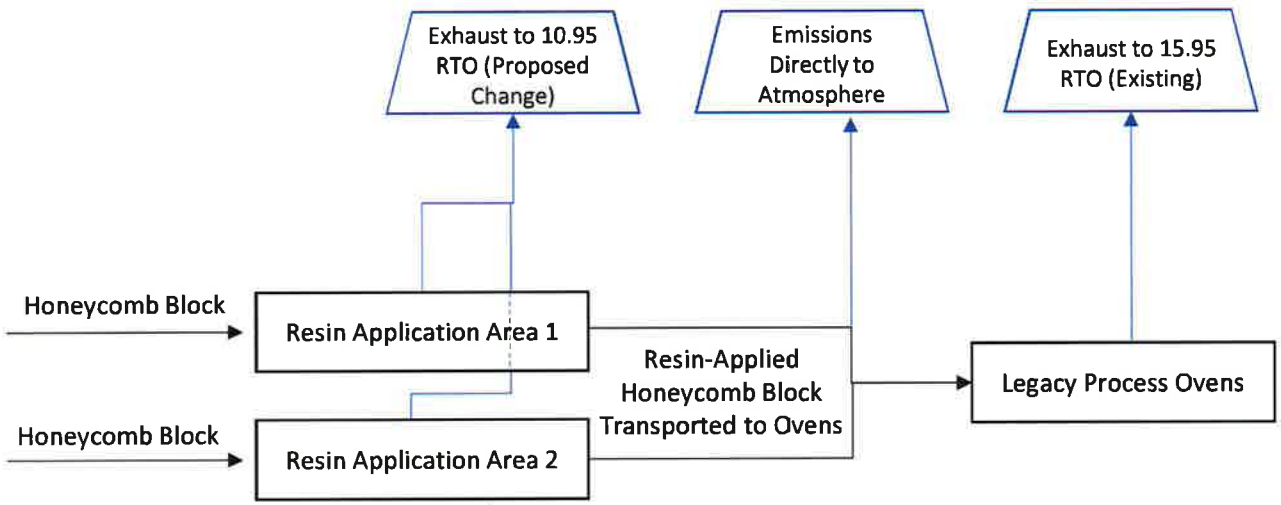
Each resin application areas in the Legacy process line contains a lengthy natural draft opening above the enclosure. The project team is currently investigating ways to minimize the square footage of the existing openings to a point where the velocity across the natural draft openings will be greater than 100 ft/min. This will allow the facility to assume that 100% of the emissions in the application areas are captured and controlled by the 10.95 RTO.

After making this change, the only area of the Legacy process line that will have uncaptured/uncontrolled emissions is the process of unloading the honeycomb block from the application area, transporting it to the oven room and loading the block into an oven. Given that the amount of time that there are uncaptured emissions is small compared to the total process time, this permit application assumes that approximately two-thirds of the previously uncaptured emissions will be captured and directed to the 10.95 RTO. After the ventilation change, 69% of the total emissions from the Legacy process line will be captured and controlled by the 15.95 RTO, 21% of the total emissions from the Legacy process line will be captured and controlled by the 10.95 RTO, and 10% of the total emissions from the Legacy process line will remain uncaptured and uncontrolled.

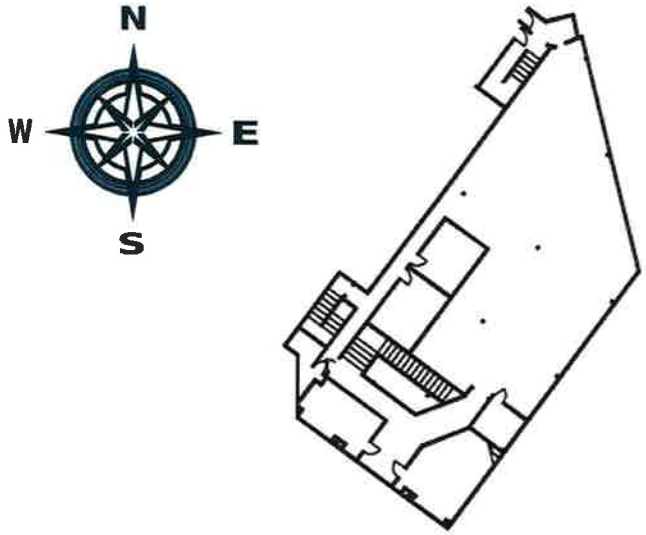
The summary of emissions from the C4 and Legacy lines are included as an attachment to this report. The summary page includes the historical usage data with the updates to the capture efficiencies described above. The calculations also assume the worst-case destruction efficiency for each of the oxidizers. The phenol

emissions reduction that will be observed after the amending of the operations to control the Legacy resin application areas has been estimated to be just under 5 tons/year based on past monthly usage information. This will result in actual phenol emissions of approximately 5 tons/year from all sources at the facility. The monthly emission calculation spreadsheet will be updated to include the additional controls after the change described above has been completed.

Legacy Process Flow Diagram



Safran Cabin Materials, LLC Building 2 – Permitted Equipment Map



Permit No.	Department	Equipment
4892	Facility / Maintenance	One Water Tube Boiler at 4.0 MMBtu/hr (100 HP) and one Southwestern System Steam Convection Purge Chamber at 450,000 Btu/hr
9020	Print Shop	Catalytic Products NR-1000 Natural Gas Heated Thermal Oxidizer
10715	Resin Application Legacy Stage Cure Ovens @ 2 & Post Cure Ovens @ 2	Catalytic Products Triton 15.95 Regenerative Thermal Oxidizer
10715	C4-1 Stage Cure Ovens @ 2 and Post Cure Ovens @ 3	Catalytic Products Triton 10.95 Regenerative Thermal Oxidizer
10715	C4-2 Stage Cure Ovens @ 2 and Post Cure Ovens @ 5	Catalytic Products Triton 15.95 Regenerative Thermal Oxidizer