



Puget Sound Clean Air Agency

Notice of
Construction No.

12019

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

Registration No. 29463
Date

AUG 21 2020

Modification of the permit conditions for the emission control equipment permitted under Order of Approval No. 11336.

Establishment of a Foam Products Manufacturing Facility to include: a Polyisocyanurate Foam Pour Table and Lamination line, controlled by a Baghouse rated at 27,000 cfm, and a 6.5 MMBtu/h Regenerative Thermal Oxidizer, rated at 36,000 cfm; a 24 foot Idro EPS foam Vacuum Block Molder, with a pre-expander and aging bag farm, all controlled by a 2 MMBtu/h Regenerative Thermal Oxidizer rated at 8400 cfm.

OWNER

Carlisle Construction Materials Incorporated
1285 Ritner Highway
Carlisle, PA 17013

INSTALLATION ADDRESS

Carlisle Construction Materials Incorporated
19727 57th Ave E
Puyallup, WA 98375

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.

PLANT-WIDE EMISSIONS:

3. Carlisle Construction Materials LLC (CCM) emissions shall not exceed 249.0 tons of VOC in a rolling 12-month period. CCM shall calculate a new 12-month total by the twentieth day of each month using data from the previous 12 months. CCM shall submit a complete Title V application within 365 days of the issuance of this permit or emitting \geq 100.0 tons of VOC in a consecutive 12-month period, whichever comes first.
4. CCM shall notify the Clean Air Agency within 15 days that a calculation demonstrates that the rolling 12-month emissions of VOC will exceed 237.5 tons. Such reporting shall continue monthly until the rolling 12-month rolling total returns to less than 237.5 tons for three consecutive months.

PLANT-WIDE MONITORING & RECORD KEEPING:

5. CCM shall keep the following electronic or paper records onsite for at least five years and shall make them available to Puget Sound Clean Air (Agency) personnel upon request:
 - Quantity of all final product produced, including foam board, footers, and foam slab produced (pounds per month and pounds/ rolling 12-month period)
 - All calculations and emission factors used in determining actual VOC emissions.
 - Regenerative Thermal Oxidizers (RTO) centerline temperature records, and records of thermocouple

calibrations (or replacement), and tests of the electronic interlock.

- Operating and Maintenance Plan monitoring, maintenance, and corrective actions logs for the Baghouse, and the VOC collection - destruction systems.
- Copies of all reports generated by the testing required in this Order.

HUNTER PANEL:

6. CCM shall capture at least 86% of the emissions of Pentane from the foam head, laminating table, and foam cutting table dust collector. All captured Pentane shall be routed to a RTO. The RTO shall have a destruction efficiency of at least 97% by weight of the Pentane entering the unit, as determined by EPA Method 25A. Initial testing of the capture and destruction efficiency of this capture and control system shall take place within 120 days after plant startup and thereafter every five (5) years and after every enclosure reconfiguration. Submit the capture efficiency test plan and test method, with the EPA Method 25A test plan, to the Agency at least 21 days before compliance testing.

INSULFOAM:

7. CCM shall construct a Permanent Total Enclosure (PTE) for the Bead Aging Bag Farm that, when tested, meets the criteria in 40 CFR Part 51, Appendix M, Method 204, Method 204-Criteria for and Verification of a Permanent or Temporary Total Enclosure, for 100% VOC (Pentane) capture.
8. After installation and initial production line testing is completed, but not to exceed three weeks from initial bead expansion, all emissions of Pentane from pre-expansion, aging and block molding equipment shall be captured with an combined efficiency of at least 67% by weight of the pentane released that is available for capture. All captured Pentane shall be routed to a RTO. The RTO shall have a destruction efficiency of at least 97% by weight of the Pentane entering the unit, as determined by EPA Method 25A . Initial testing of the destruction efficiency of this capture and control system shall take place 60 days after RTO startup and thereafter every five (5) years. Certification of the PTE will take place within 60 days of every enclosure reconfiguration. Submit the capture efficiency test plan to the Agency at least 21 days before compliance testing.

REGENERATIVE THERMAL OXIDIZERS (RTO) & VOC COLLECTION:

9. CCM shall equip their RTOs with a thermocouple to measure the centerline operating temperature with an accuracy of +/- 15°F with a continuous recorder to log the temperature. The RTO temperature control system shall be calibrated and adjusted to a NIST traceable standard, or replaced by a like kind of calibrated unit. The procedure shall be performed and logged at least once every 12 months.
10. Once both the block molder and its RTO are installed, CCM shall not begin operation of the block molding or Hunter Panel lines unless the RTO centerline bed set point temperature is equal to or greater than the set point temperature recommended by the manufacturer for installation and commissioning, and then by the temperature set point used during the most recent passed source test. The RTO centerline temperature will be continuously monitored and recorded, and electronically interlocked with the RTO to prevent its operation whenever the instantaneous centerline temperature is less than 1400°F. CCM shall conduct a test of this interlock within 60 days of initial startup and annually thereafter.
11. CCM shall repair any visible gaps or leaks in the duct work and enclosures used to capture pentane within 24 hours of their detection or shut down the affected production line until the repairs are completed.
12. Dust Collectors: A manometer or magnehelic pressure gauge shall be installed on the dust collectors to

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measure the differential pressure across the filter. The filter manufacturer recommended acceptable range of Static pressure differential across the filter shall be marked on or adjacent to the gauge. The pressure gauge shall be located such that an inspector/operator can safely read the indicator at any time. The instrument shall be calibrated according to the manufacturer's instructions and/or recommendations. The pressure differential readings shall be taken and logged at least once per day of operation. Corrective actions taken as a result of a reading outside of the acceptable range shall also be logged.

GENERAL

13. On the date of its issuance, this Order of Approval No. 12019 cancels and supersedes Order of Approval No. 11336, dated June 1, 2017.

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.



RM Courtney Shernan
Reviewing Engineer



John Dawson
Engineering Manager