Puget Sound Clean Air Agency

1904 3rd Ave, Ste 105, Seattle, WA 98101-3317

Notice of Construction No. **12309**

Registration No. **28982**

Date

GENERAL REGULATORY ORDER

Under the authority of Puget Sound Clean Air Agency Regulation I, Section 3.03, General Regulatory Orders, this Order is issued to:

Bellmont Cabinets Company

for the facility located at:

13610 52nd St E STE 300
Sumner, WA 98390

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 Repo**rting 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.

APPEAL RIGHTS

Pursuant to 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, an appeal must be filed with the PCHB and a copy served upon Puget Sound Clean Air Agency within 30 days of receiving this Order.

Carl Slimp
Reviewing Engineer

John Dawson
Engineering Manager