Puget Sound Clean Air Agency

Notice of Construction No. **12527**

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

Registration No. **17033**

Date

One C4-2 adhesive application line consisting of five ovens and two coaters. One Legacy adhesive application line consisting of four ovens and two enclosed resin application areas. Emissions from the Legacy line application areas and two of the Legacy line ovens are controlled by one 1.9 MMBtu/hr natural gas-fired Triton 10.95 regenerative thermal oxidizer. Emissions from the C4-2 line ovens and two of the Legacy line ovens are controlled by one 4 MMBtu/hr natural gas-fired Triton 15.95 regenerative thermal oxidizer.

OWNER

Safran Cabin
12810 State Avenue
Marysville, WA 98271

INSTALLATION ADDRESS

Safran Cabin
12806, 12810 & 12730 State Ave, Bldg #1/#2 /#3
Marysville, WA 98271

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.

FACILITY-WIDE EMISSION LIMITS:

3. The owner or operator shall limit facility-wide emissions of hazardous air pollutants (HAPs) as established by 42 U.S.C 7412(b)(1) and amended in 40 CFR 63 Subpart C in Section 112(b) to less than 9.9 tons of any single listed HAP, 24.9 tons of all HAPs combined, and 99.0 tons of volatile organic compounds (VOCs) during any 12 consecutive months.

4. The owner or operator shall monitor and record quantities of all purchases of raw materials and quantities of full containers of expired, unused raw materials that were shipped as waste on a monthly basis. Raw materials include all products used at the facility that contribute to HAP and VOC emissions. The owner or operator shall maintain, on-site, safety data sheets or certified product data sheets for these raw materials.

5. Within 15 days of the end of each month, the owner or operator shall calculate the facility-wide emissions for each HAP, total HAP, and total VOC for the previous 12 months using a mass balance approach. Emissions shall be calculated using either the actual HAP content for each lot of material provided by the manufacturer or the maximum HAP content (% composition or lb/gallon), the VOC content (% composition or lb/gallon) of each coating, and the total amount (pounds or gallons) of each HAP- and VOC-containing material applied. Purchase records may be used as a surrogate for usage. If the actual HAP content for each lot of material provided by the manufacturer is used, the owner or operator shall maintain records from the manufacturer that show the HAP content contained in the batch as a weight percentage. For the C4-2, and Legacy lines, emissions shall be calculated in accordance with Condition 7. The owner or operator shall prepare monthly records that demonstrate that facility-wide emissions do not

exceed the emission limits in Condition 3. Monthly records shall include the following:

a. Monthly emissions of each HAP;
b. Monthly emissions of total HAP;
c. Monthly emissions of total VOC; and
d. Emissions of each HAP, total HAP, and total VOC emitted over the previous consecutive 12-month period.

6. The owner or operator may not credit shipments of waste in the mass balance calculation, except waste shipments of full containers of expired, unused raw materials. For each waste shipment credited in the facility-wide emission calculations, the owner or operator shall maintain documentation showing that the material has been shipped offsite, including the name of the product, the date that the waste was shipped offsite, and the amount of material shipped.

7. For the emission calculations required by Condition 5 for the C4-2 and Legacy lines, the owner or operator shall comply with the following:

   a. The owner or operator shall apply a destruction efficiency for the percentage of the VOC, total HAP, and individual HAP emissions captured and routed to the regenerative thermal oxidizers (RTOs). The destruction efficiency used for each RTO for the current monthly emission calculations shall be determined by using the lowest destruction efficiency achieved by each RTO using the two most recent source tests for that RTO conducted in accordance with Conditions 16 or 17. The overall capture efficiency for the Legacy line shall be determined based on the most recent test conducted in accordance with Condition No. 19.

   b. The owner or operator may assume that the capture efficiency for the C4-2 line is 69 percent unless the overall capture of efficiency of the C4-2 line is tested in accordance with Condition No. 20.

   c. The owner or operator may use the actual phenol content for each batch of GP7649 resin used, instead of the maximum phenol content provided on the safety data sheet, provided that the owner or operator maintains records from the resin manufacturer for each batch received that shows the phenol content contained in the batch as a weight percentage.

   d. The owner or operator may assume that a percentage of the phenol contained in the GP7649 resin polymerizes and remains in the final honeycomb core product. If the owner or operator chooses to use this assumption, the phenol polymerization rate used for the current monthly emissions calculation shall be the lesser of 37% or the lowest polymerization rate measured during the phenol polymerization testing conducted in accordance with Condition 18.

8. The owner or operator shall notify the Puget Sound Clean Air Agency in writing, within 30 days after the end of each 12-month period if, during that period, emissions of any individual HAP exceeded 8.0 tons, emissions of any combination of HAP exceeded 20.0 tons, or emissions of VOC exceeded 80.0 tons. The report shall include a summary of the total 12-month emissions and the amount of resin used for the C4-2, and Legacy lines for the time period for which these thresholds were exceeded. Upon request, the owner or operator shall provide the supporting emission calculations for the reported emission totals.

LEGACY LINE RESIN USAGE LIMIT

9. The owner or operator shall limit resin usage to no more than 548,000 pounds during any consecutive 12-month period.

10. The owner or operator shall monitor and record resin usage in the Legacy Line and within 15 days of the

end of each month, calculate and record the resin usage for the previous 12 months.

REGENERATIVE THERMAL OXIDIZER EMISSION LIMITS

11. The owner or operator shall only operate four ovens in the Legacy adhesive application line at any one time except during startup testing for the replacement ovens. Startup testing on each oven shall not be conducted for more than 30 days.

12. The exhaust from two of the Legacy production line ovens and the and C4-2 production line ovens shall be vented to the Catalytic Products Triton-15.95 Regenerative Thermal Oxidizer (RTO) for control. The RTO shall be operated at all times while the Legacy ovens or C4-2 production line is running.

13. The exhaust from the two enclosed Legacy resin application areas and two of the Legacy production line ovens shall be vented to the Catalytic Products Triton-10.95 RTO for control. The RTO shall be operated at all times while the Legacy production line is running.

14. Each RTO must meet one of the following emission limits, as determined by EPA Method 25A:

    a. A minimum non-methane organic compound (NMOC) destruction efficiency of 98.5 percent; or
    b. An outlet NMOC concentration of no greater than 10 parts per million as propane, on a dry, volumetric basis.

CAPTURE EFFICIENCY LIMITS

15. The owner or operator shall capture at least 90% by weight of the VOC emissions from the Legacy line, including the ovens, resin application areas, and all intermediate steps. The Legacy enclosed resin application areas shall meet the criteria for a Permanent Total Enclosure (PTE) in 40 CFR Part 51, Appendix M, Method 204.

COMPLIANCE DEMONSTRATION

16. Within 180 days of installation of all four replacement ovens but no later than June 28, 2026, the owner or operator shall test emissions from the Triton 10.95 RTO and the Triton 15.95 RTO in accordance with Regulation I, Section 3.07 to demonstrate compliance with Condition 14. Testing shall consist of at least three, one hour runs using EPA Method 25A and shall include simultaneous measurements at the inlet and outlet of the RTO. The owner or operator shall submit a compliance test plan with the test notification submitted under Regulation I, Section 3.07(b) at least 21 days prior to the compliance test. The test plan shall detail the test methods used for each pollutant, the operational data that will be collected during the test, and any other relevant information about the test.

17. To demonstrate ongoing compliance with Condition 14, the owner or operator shall test emissions from the Triton 10.95 RTO and the Triton 15.95 RTO at least once every 3 years in accordance with Regulation I, Section 3.07. Testing shall consist of at least three, one hour runs using EPA Method 25A and shall include simultaneous measurements at the inlet and outlet of each RTO. The owner or operator shall submit a compliance test plan with the test notification submitted under Regulation I, Section 3.07(b) at least 21 days prior to each compliance test. The test plan shall detail the test methods used for each pollutant, the operational data that will be collected during the test, and any other relevant information about the test. During all compliance tests, the exhaust shall be sampled at a location prior to the addition of dilution air to the system.

18. For each source test conducted in accordance with Condition Nos. 16 and 17 the owner or operator shall determine the phenol polymerization percentage during each test run. In the test plan required by

Condition Nos. 16 and 17, the owner or operator shall detail the proposed testing methodology, including test method that will be used and the methodology used for calculating the polymerization percentage.

19. For each source test conducted in accordance with Condition Nos. 16 and 17, the owner or operator must test the overall capture efficiency of the Legacy line. The owner or operator shall submit a compliance test plan and test notification at least 21 days prior to the compliance test. The test plan shall detail the testing procedure, the operational data that will be collected during the test, and any other relevant information about the test.

20. If requested by the Agency, the owner or operator must test the overall capture efficiency of the C4-2 line in the timeframe requested by the Agency. If a test is required by the Agency, the owner or operator shall submit a compliance test plan and test notification at least 21 days prior to the compliance test. The test plan shall detail the testing procedure, the operational data that will be collected during the test, and any other relevant information about the test.

OPERATING LIMITS

21. After the Legacy resin application process is complete and the resin application enclosure is opened, each block shall immediately be transferred to an open curing oven.

22. The RTOs shall be operated at or above the average temperature maintained during the last stack test but shall not be operated at less than 1,400 °F, 1-minute average. The average temperature during the last stack test for each RTO shall be identified at or near the temperature monitor.

23. Each RTO shall be equipped with a thermocouple near the exit of the combustion chamber to measure temperature to +/- 14 °F. Temperature data must be measured and recorded continuously (or sampled at intervals no greater than 10 seconds and recorded as 1 minute averages).

24. The owner or operator shall annually test and calibrate or replace the thermocouples for each RTO. If performed, the test shall consist of either a physical or electronically simulated comparison and shall follow manufacturer specifications. The results of the test readings must be within +/- 14 °F. If the results of the test readings exceed +/- 14 °F of the reference value, the thermocouple must be replaced or adjusted to read within +/- 14 °F of the reference value. The owner or operator shall keep records of thermocouple calibration test reports, including the date and results of each test, the test method used, and a record of who performed the test. If the thermocouple is replaced, the owner or operator shall keep a record of the date it was replaced and who replaced it.

RECORDS

25. The owner or operator shall maintain records required by this Order of Approval for five years and make them available to Puget Sound Clean Air Agency personnel upon request.

26. Upon installation of the replacement curing ovens, this Order supersedes and cancels Order of Approval No. 12500 dated February 7, 2025.

Order of Approval for NC No. 12527

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.

Maggie Corbin	John Dawson
Reviewing Engineer	Engineering Manager