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Olympia, WA 98502

*Representing Clallam, Grays Harbor, Jefferson,
Mason, Pacific, and Thurston Counties*

(360) 539-7610 • 1-800-422-5623

November 3, 2023

Rogers Paint Group LLC
PO Box 2024
Port Townsend WA 98368

RE: Final Determination – 23NOC1602

Greetings:

Olympic Region Clean Air Agency (ORCAA) has approved your Notice of Construction for the facility located at **151 Fredricks St, Port Townsend, Jefferson County**, Washington.

Read, become familiar with, and retain these documents for future reference. The applicable regulations and special conditions of approval identified in your permit are enforceable by ORCAA.

You may appeal the Approval Order within 30 days, by sending a written appeal to the Pollution Control Hearings Board and ORCAA.

Sincerely,

Debbie Moody
Office Manager

Enclosures

ORDER OF APPROVAL
NOTICE OF CONSTRUCTION 23NOC1602
ISSUED to Rogers Paint Group LLC on
OCT 3 1 2023

This Order of Approval ("Order") is issued in accordance with Olympic Region Clean Air Agency ("ORCAA") Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6.

Conditional approval to replace the existing spray booth and use of new wood-finishing materials located at 151 W. Fredericks St. in Port Townsend ("Approved Location"), for operation solely as described in the associated Notice of Construction ("NOC") application 23NOC1602, is hereby GRANTED to Rogers Paint Group LLC ("Applicant"), subject to the Conditions of Approval listed below.

This Order and the Conditions of Approval herein remain in effect for the life of the Approved Equipment as used at the Approved Location and shall be binding on Applicant, current owners and operators of the equipment, and Applicant's heirs, successors and assigns unless amended or superseded by a subsequent Order issued by ORCAA or unless the equipment is permanently shut down. The Applicant must notify any subsequent owner, operator, heirs, successor or assigns of this Order and the Conditions of Approval herein.

Conditions of Approval established in this Order shall be enforceable in addition to any applicable state, local and federal regulations, or standards in existence now or in the future. Compliance with the conditions of this Order do not relieve the Applicant or any owner or operator from compliance with ORCAA Regulations, chapter 70A.15 of the Revised Code of Washington, or any other emissions control requirements, nor from any penalties for failure to comply with the same. Applicant may appeal this Order to the Pollution Control Hearings Board ("PCHB") by filing a written appeal with the PCHB and serving a copy upon ORCAA within thirty (30) days of receipt of this Order.

This Order supersedes Order NOC# 19NOC1366 and is GRANTED, for the Approved Location, subject to the following Conditions of Approval:

- 1. Approved Coating Operations.** The application of wood finishes to millwork products such as, but not limited to, doors, cabinets, stairs, banisters, furniture, molding and mantels, as described in Notice of Construction application Nos. 23NOC1602, 19NOC1366, and their respective associated Final Determinations, is approved for construction and operation subject to conditions in this Order of Approval.

[Regulatory Basis: ORCAA 6.1(a); ORCAA 6.1.2(l); 40 CFR part 52.2470(c), Table 6]

2. Approved Spray Equipment. The owner or operator is approved to apply wood finishes. All spray coating operations must be conducted within the spray booth identified in Table 1 and in accordance with conditions in this Order of Approval. Prior approval by ORCAA may be required for the following as specified in ORCAA Rule 6.1:

- a. Construction, installation, or establishment of any stationary source;
- b. Modification to any existing stationary source;
- c. Replacement or substantial alteration of emission control technology installed on an existing stationary source;
- d. Deviations from the approved plans, drawings, data, and specifications of the stationary sources listed in Table 1; or,
- e. Using any new VOC-containing material (paints, lacquers, stains, solvents) that would result in emissions of a new Toxic Air Pollutant (TAP) or a significant increase in TAPs already emitted.

Table 1: Approved Equipment

Emission Unit	Specifications:	Air Pollution Controls
EU1 – Spray Booth	<ul style="list-style-type: none"> • Manufacturer: Global Finishing Solutions • Serial #: U129271-A • Manf. Date: 7/21/2021 • Open table/bench updraft, 3-walls • Not heated • Filter system with average efficiency of at least 98% 	<ul style="list-style-type: none"> • Stack release point at least 6’ above the peak height of the building • Exhaust filtration system with combined filtration efficiency of at least 98%

[Regulatory Basis: ORCAA 6.1(a); ORCAA 6.1.2(l); WAC 173-400-110(2); WAC 173-400-111(10)]

3. Cumulative Material Use Limits. The cumulative amounts of materials applied during any 12-consecutive month period must not exceed:

- a. 3,500 gallons for all materials containing volatile organic compounds (VOC Containing Materials). VOC Containing Materials include, but are not limited to, pre-treatment washes, stripping and cleaning products, primers, topcoats, clearcoats, lacquers, stains, varnish, shellac, binders, reducers, activators, hardeners, fillers, tints, sealers, putties, polishes and thinners.
- b. 630 gallons for all materials containing Propylene Glycol (CAS 57-55-6); and,
- c. 1,100 gallons for all materials containing Ethylbenzene (CAS 100-41-4).

[Regulatory Basis: ORCAA 6.1.4(a)(1) and (5); ORCAA 7.6; WAC 173-460-070]

4. Stack Requirements: The exhaust stack of the spray booth must have a vertical discharge to the atmosphere at least six feet above the peak height of the building. There must be no flow obstructions at the point of discharge (i.e., cap). However, a weatherproof stack exhaust configuration that does not obstruct the air flow as it exits the stack is acceptable.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2); WAC 173-460-040(3)]

5. Operation & Maintenance Requirements: The following is required:

- a. Only high-volume low-pressure (HVLP), electrostatic, airless, air-assisted airless equipment, or an equivalent technology capable of at least 65% transfer efficiency, is permitted for spray application of VOC Containing Materials.
- b. Approved spray booth must be equipped with properly seated exhaust filters that cover all openings of the exhaust plenum and are rated at least 98 percent efficient.
- c. Hand cleaning of gun parts in a solvent container by flushing solvent through the gun without atomizing the solvent and paint residue or using a fully enclosed spray gun washer.
- d. Keeping VOC Containing Materials in closed containers when not in use.
- e. Operating and maintaining the spray booth consistent with the manufacturer's recommendations.
- f. Storing all solvents, solvent-containing cloths, or other materials used for surface preparation in closed, airtight containers.
- g. Minimizing and promptly cleaning up all VOC Containing Material spills and leaks.
- h. Ensuring that filters are properly seated and cover all openings of the exhaust plenum of the spray booth.
- i. Monitoring filters on a regular basis and replacing whenever damaged or loaded with particulate build-up to an extent that jeopardizes the effectiveness of the spray booth in capturing and controlling emissions.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); ORCAA Rule 8.8; ORCAA Rule 4.3(g); 40 CFR part 52.2470(c), Table 6]

6. Material Use and Composition Monitoring:

- a. Compliance with Condition #3 must be monitored at least monthly by summing the actual gallons used over the previous 12-consecutive month period of VOC containing materials, materials containing propylene glycol (CAS# 57-55-6), and materials containing ethylbenzene (CAS# 100-41-4).
- b. The owner or operator must monitor and maintain record of the composition of all VOC-containing materials used.

[Regulatory Basis: ORCAA 6.1.4(a)(2); 40 CFR Part 52.2470(c), Table 6]

7. Recordkeeping: Copies of records must be kept on-site and in a printed or electronic form for at least 5 years. At a minimum, records must include the following:

- a. Purchase invoices or usage records for all finishes and other VOC Containing Materials applied including the date of purchase and corresponding product identification numbers.
- b. Safety Data Sheets (SDS) for all finishes and other VOC Containing Materials on site associated with coating operations.
- c. Records sufficient to verify the average overspray arrestance (filtration) ratings of each exhaust filter type. Published filter efficiency data provided by filter vendors or laboratories may be used to demonstrate compliance with this requirement.
- d. Records of consecutive 12-month totals to demonstrate compliance with the cumulative material use limits outlined in Condition #3.

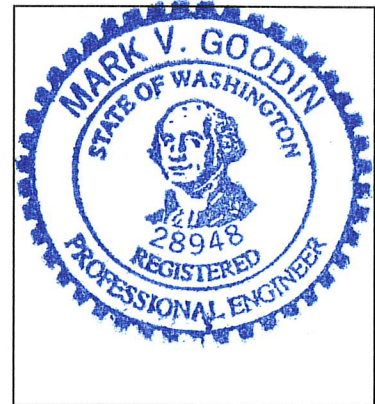
[Regulatory Basis: ORCAA 8.11; 40 CFR part 52.2470(c), Table 6]

Lauren Whybrew 10/31/23

PREPARED BY: Lauren Whybrew, Engineer II Date

Mark V. Goodin 10/31/2023

REVIEWED BY: Mark V. Goodin, PE Date





**Olympic Region
Clean Air Agency**
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*Serving Clallam,
Grays Harbor, Jefferson,
Mason, Pacific, and
Thurston counties.*

NEW SOURCE FINAL DETERMINATION to APPROVE:

After the fact replacement of a
spray booth and modification

Rogers Paint Group LLC

23NOC1602

October 6, 2023

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NOTICE OF CONSTRUCTION FINAL DETERMINATION TO APPROVE

Olympic Region Clean Air Agency

Issued to:	Rogers Paint Group LLC	County:	Jefferson
Location:	151 West Fredericks Street Port Townsend, Washington	Source:	95
Application #:	23NOC1602	RC:	RC5
Prepared on:	October 6, 2023	File:	407

1. Summary

Rogers Paint Group LLC (Rogers) seeks after-the-fact approval from Olympic Region Clean Air Agency (ORCAA) for replacement of an existing spray booth at 151 West Fredericks Street in Port Townsend, Washington. Additionally, ORCAA staff reviewed coatings and solvents provided in the 23NOC1602 application and reviewed applicable incremental increases of emissions that were not previously reviewed by ORCAA during the original review for the spray booth that was removed (NOC# 19NOC1366).

Replacing a spray booth is considered a replacement of a control device. Pursuant to the Washington Clean Air Act under 70A.15.2220 of the Revised Code of Washington, ORCAA's Rule 6.1(a)(3) and Washington Administrative Code 173-400-114 (WAC 173-400-114) require review and approval through a Notice of Construction (NOC) application prior to replacing or substantially altering any air pollution control technology that does not qualify as routine maintenance, repair, or similar parts replacement. Per Rule 6.1.10, only projects that do not increase air pollution qualify for review under Rule 6.1(a)(3) and WAC 173-400-114.

However, this review also encompasses potential increases in toxic air pollutants due to use of reformulated or new materials beyond what was proposed by Rogers, and originally approved, in the NOC# 19NOC1366 review.

ORCAA staff reviewed Rogers' proposal and concluded it may be conditionally approved. Recommended conditions of approval are detailed in Section 16 of this Final Determination report.

2. Regulatory Background

Pursuant to the Washington Clean Air Act under chapter 70A.15 of the Revised Code of Washington, ORCAA's Rule 6.1 and the Washington State Implementation Plan under 40 CFR

part 52.2470(c), Table 6¹ require New Source Review (NSR) for new stationary sources of air pollution (referred to as new sources) in ORCAA's jurisdiction. NSR is also required prior to installing, replacing, or substantially altering any air pollution control technology. NSR generally refers to the process of evaluating air quality impacts and the likelihood of compliance with applicable air regulations and standards. NSR and approval of an air permit by ORCAA is required prior to commencing construction or modification of any new source or prior to installing, replacing, or substantially altering air pollution control technology. The goal of NSR is to assure compliance with applicable air regulations and standards, including equipment performance standards and ambient air quality standards.

NSR is initiated by a project proponent submitting an air permit application referred to as Notice of Construction (NOC) application², which provides ORCAA information on the proposed project of sufficient detail to characterize air impacts. NOC applications are posted on ORCAA's website and may undergo a public notice and comment period if requested by the public or if emissions' increases trigger an automatic public notice. Approval of a NOC in an attainment or unclassifiable area³ is contingent on verifying a proposed project meets the following criteria from ORCAA's Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6:

1. **Performance Standards** - The new stationary source will likely comply with applicable air-performance standards such as federal new source performance standards (NSPS), national emission standards for hazardous air pollutants (NESHAPs), or any performance standards adopted under chapter 70A.15 RCW;
2. **BACT** - The new stationary source will employ "Best Available Control Technology" (BACT) to control all air pollutants emitted;
3. **RACT** - Replaced or substantially altered air pollution control technology meets the standard of "Reasonably Available Control Technology" (RACT) as defined in ORCAA Rule 1.4;
4. **Ambient Air Quality** - Emissions from the new stationary source will not cause or contribute to a violation of any ambient air quality standard;
5. **Federal Air Permitting Requirements** - The new stationary source secures all applicable federal air permits that may apply; and,
6. **Air Toxics** - If there are increases in toxic air pollutant (TAP) emissions, the requirements of Washington's Controls for New Sources of Toxic Air Pollutants under Chapter 173-460

¹ A State Implementation Plan (SIP) is a collection of regulations and documents used by a state, territory, or local air district to implement, maintain, and enforce the National Ambient Air Quality Standards, or NAAQS, and to fulfill other requirements of the federal Clean Air Act. The Clean Air Act requires the EPA to review and approve all SIPs. ORCAA's SIP was last approved by EPA in 1995.

² There are two categories of NOC applications: Notice of Construction (NOC) and Notice of Construction Revision (NOR). NOCs are required for new or modified sources, new control technology, replacing an existing stationary source or control technology, and substantially altering control technology. NORs are required when an owner or operator requests a revision to an existing air permit issued by ORCAA.

³ Unclassified area or "attainment area" means an area that has not otherwise been designated by EPA as nonattainment with ambient air quality standards for a particular regulated pollutant. Attainment area means any geographic area in which levels of a given criteria air pollutant (e.g., ozone, carbon monoxide, PM10, PM2.5, and nitrogen dioxide) meet the health-based National Ambient Air Quality Standards (NAAQS) for that pollutant. An area may be an attainment area for one pollutant and a nonattainment area for others.

WAC are met.

In this case, Rogers Paint Group LLC replaced a spray booth at their shop, originally triggering the need to submit an after-the-fact NOC application to ORCAA. The safety data sheets for coatings and solvents currently used at the facility were provided in the NOC application for NOC #23NOC1602 and they include several toxic air pollutants that were not proposed in the original NOC application, NOC# 19NOC1366. This review encompasses both the spray booth replacement, as well as emissions increases that were not captured by the NOC# 19NOC1366 application.

3. Facility Background

Rogers owns and operates a facility that produces finished wood doors and cabinets for residential housing. At ORCAA's direction, the facility submitted an after-the-fact NOC application in June 2019, and was subsequently registered with the agency after receipt of that application.

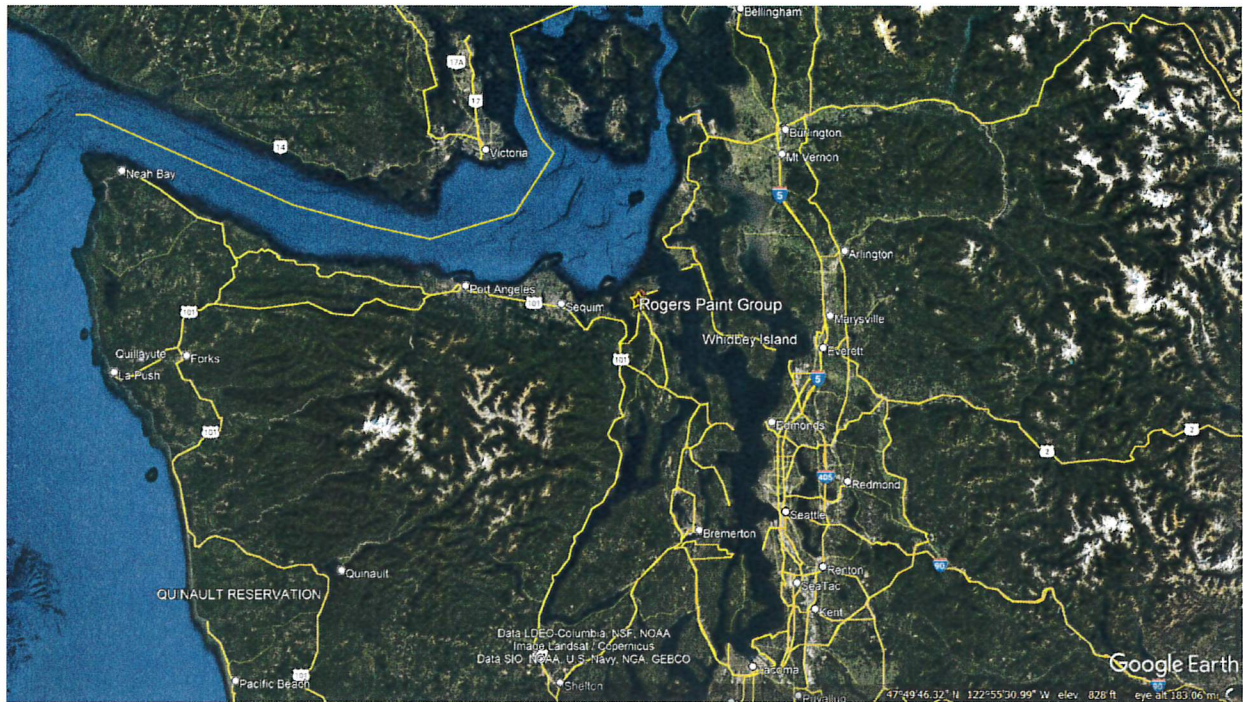
Table 1. Permitting History with ORCAA

Permit # (date)	Description	Status
19NOC1366	After-the-fact review and conditional approval of a spray booth and spray application of wood finishes.	<i>Equipment Removed</i> Will be superseded by 23NOC1602
23NOC1602	After-the-fact review of a spray booth replacement, and review of new coating materials containing TAPs that were not included in the 19NOC1366 application.	Under review.

4. Facility Description

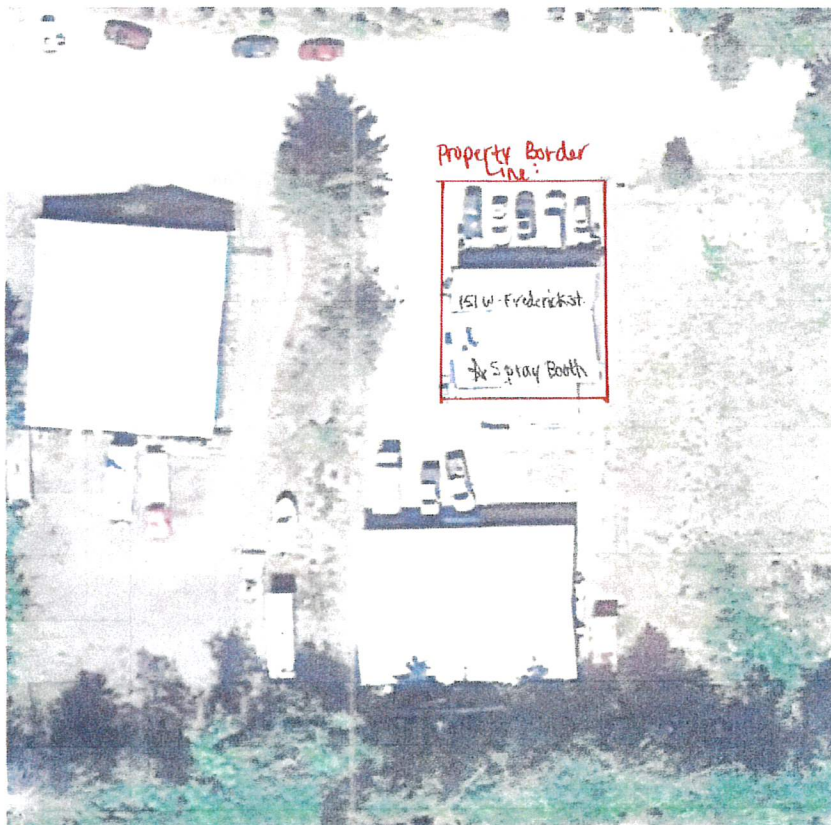
Rogers owns and operates a facility that produces finished wood doors and cabinets for residential housing. Existing spray operations will continue to cause Volatile Organic Compound (VOC) and particulate emissions to the atmosphere. Based on Safety Data Sheets (SDSs) for the finishes applied, there are several toxic air pollutants (TAP) that were not included in the facility's original after-the-fact approval, NOC# 19NOC1366.

Figure 1: Facility Location



* Imagery ©2023 Google Earth Pro 7.3.6.9345
** Annotated by ORCAA

Figure 2: Site Map



*Imagery from NOC# 23NOC1602 Application Addendum #1

5. Project Description

Rogers owns and operates a facility that produces finished wood doors and cabinets for residential housing. During a 2023 full compliance evaluation, ORCAA staff discovered that the existing spray booth (NOC# 19NOC1336) had been replaced.

ORCAA received a NOC application and Safety Data Sheets for coatings and solvents used on July 3, 2023. Overall operations and potential emissions were not expected to increase, however there are several toxic air pollutants (TAPs) that were not addressed in the 19NOC1336 application and are therefore included in this review.

Table 2: New Spray Booth

Equipment	Manufacturer	Specifications
Spray Booth	Global Finishing Solutions Serial #: U129271-A Manf. 7/21/2021	<ul style="list-style-type: none"> Open table/bench updraft 3-walled spray booth Exhaust CFM: 8,000 Stack within a stack, exhausts vertically Stack height: At least six feet above the peak height of the building Not heated Filter system with average efficiency of at least 98%

6. Emission Increases

ORCAA was not requested to modify the existing gallon usage limits in the Order of Approval for NOC# 19NOC1336. Currently, Rogers has the following 12-consecutive month material restrictions:

- 3,500 gallons for all materials containing volatile organic compounds (VOC Containing Materials);
- 630 gallons for all materials containing Propylene Glycol (CAS 57-55-6);
- 1,100 gallons for all materials containing Ethylbenzene (CAS 100-41-4); and,
- Application of any material containing Naphthalene (CAS 91-20-3) is prohibited without prior approval from ORCAA.

These material usage limits were based on review of SDSs for the coatings provided by the applicant. From the 19NOC1366 Emissions Increases section of the Final Determination:

Based on Safety Data Sheets (SDSs) for the finishes applied, there will be eight regulated TAPs emitted in significant quantities. Emissions were estimated using a mass balance approach. The estimates account for both particulate and gaseous emissions based on the amount of material spray applied, the concentration of TAPs in the materials, transfer efficiency of spray equipment and spray booth capture and filtering efficiencies. Emission estimates represent likely maximum Potential to Emit (PTE). PTE is defined as the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Emissions projections in pounds reflecting PTE are shown in Table 2.

Table 2: Spray Booth Emissions Estimates

Pollutant	Annual	Daily ¹	Hourly ²
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	(lbs/yr)	(lbs/day)	(lbs/hr)
Total TAP	5,870	22.6	2.82
VOC	8,860	24.3	4.26
PM	142	0.39	0.0685

¹Daily emissions based on an operating schedule of 5 days per week for 52 weeks per year.

²Hourly emissions based on an operating schedule of 8 hours per shift and one shift per operating day.

For this review (23NOC1602) ORCAA staff reviewed SDS of products provided and compared the composition to what was reviewed in 19NOC1366. ORCAA’s review was focused on increases of existing TAP emissions, or emissions of TAPs not reviewed under 19NOC1366 to ensure compliance with Chapter 173-460 WAC; those emissions are summarized below.

Table 3. Emission Increases (Project Emissions)

Pollutant	Classification (Criteria ^a /HAP ^b /TAP ^c)	Emission Rate (lb/hr)	Emission Rate (lb/day)	Emission Rate (lb/yr)
Ethylbenzene (CAS# 100414)	HAP and TAP	Not applicable		114
Isopropanol (CAS# 67630)	TAP	0.14	Not applicable	
Methyl Ethyl Ketone (CAS# 78933)	HAP and TAP	0.01	0.1	28
Silica (Crystalline Respirable)	TAP	Not applicable	3.7E-03	Not applicable
Xylenes (isomers and mixture)	HAP and TAP	0.09	0.75	195

^a EPA has established national ambient air quality standards (NAAQS) for six of the most common air pollutants— carbon monoxide, lead, ground-level ozone, particulate matter, nitrogen dioxide, and sulfur dioxide—known as “criteria” air pollutants (or simply “criteria pollutants”).

^b HAP means Hazardous Air Pollutant. Hazardous Air Pollutants are those known to cause cancer and other serious health impacts and are regulated under the federal Clean Air Act.

^c TAP means any toxic air pollutant regulated in Washington and listed in WAC 173-460-150.

7. Administrative Requirements for NOC Applications

NOC applications are subject to filing fees according to ORCAA Rule 3.3(b) and may incur additional NOC processing fees at an hourly rate according to ORCAA Rule 3.3(c). Applicable NOC filing fees for Rogers’ NOC application were paid prior to ORCAA commencing processing of the application. Additional NOC processing fees may apply and will be determined and assessed prior to issuing a Final Determination and the Approval Order (a.k.a.: Air Permit).

NOC applications are subject to a 15-day public notice and an opportunity to request a 30-day public comment period and opportunity for a public hearing. Public notice of Rogers’ NOC application was posted on ORCAA’s website on July 12, 2023. The time period for filing comments on the application and requests for a public comment period expired on July 27, 2023. No comments on the NOC application or requests for a public comment period or hearing were received during the NOC application noticing period. Based on this result, neither a public comment period nor public hearing were initiated.

8. SEPA Review

The State Environmental Policy Act (SEPA) under Chapter 197-11 WAC is intended to provide information to agencies, applicants, and the public to encourage the development of environmentally sound proposals. The goal of SEPA is to assure that significant impacts are mitigated.

This after-the-fact replacement of a spray booth involves no material expansions or changes in use beyond that previously existing, and, therefore, is exempt from a SEPA threshold determination under WAC 187-11-800(3).

9. Criteria for Approval

ORCAA's Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6, establish the following general criteria for approving new stationary sources and modifications to existing stationary sources of air pollution in ORCAA's region:

1. **Performance Standards** - Any new stationary source or modification will likely comply with applicable air-performance standards such as the federal new source performance standards (NSPS), national emission standards for hazardous air pollutants (NESHAPs), and any performance standards adopted under chapter 70A.15 RCW;
2. **BACT** - The new or modified stationary source is controlled to a level that meets the standard of "Best Available Control Technology" (BACT);
3. **Ambient Air Quality** – Any increase in air emissions will not cause or contribute to violation of any ambient air quality standard;
4. **Federal Air Permitting Requirements** – All applicable federal air permits, if required, are secured;
5. **Washington Air Toxics Regulations** - If there are increases in toxic air pollutant (TAP) emissions, the requirements of Washington's Controls for New Sources of Toxic Air Pollutants under Chapter 173-460 WAC are met; and,
6. **Public Outreach** – Public notice and comment requirements in ORCAA's regulations and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6 are met.

The following sections provide more detail on each criterion.

10. Applicable Performance Standards (Summary)

ORCAA's Rule 6.1.4(a)(1) and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6, require a finding that any new or modified stationary source will likely comply with applicable state, federal and local performance standards for air emissions including emission standards adopted under chapter 70A.15 RCW, emissions standard of ORCAA, and federal emission standards including New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), and National Emission Standards for Hazardous Air Pollutants for Source Categories (MACT standards). The performance standards in Table 4 were determined applicable to Rogers' coating activities. The performance standards in Table 5 were determined relevant, but inapplicable. A comprehensive list of applicable performance standards that apply to all stationary sources of air pollution located at the facility, as well as general air regulations and standards that apply, are included in the Appendix.

Table 4: Applicable Performance Standards specific to Rogers Paint Group

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	discussion/determination
Concealment and Masking <i>WAC 173-400-040(8) & ORCAA 7.5</i>	Prohibits the installation or use of any means that conceals or masks an emission of an air contaminant that would otherwise violate any provisions of this chapter.	Applicable
Particulate Standards for Process units <i>WAC 173-400-060 ORCAA Rule 8.3(a)</i>	Prohibits emissions from any process unit in excess of 0.1 grain/dscf. EPA test methods from 40 CFR Appendix A shall be used should demonstration of compliance be required.	Applicable
<i>General Standards for Maximum Visual Emissions</i> <i>WAC 173-400-040(2) ORCAA Rule 8.2(a)</i>	Prohibits emissions with opacity of greater than 20% for more than three (3) minutes in any one hour.	Spray booth stack emissions
Control Equipment Maintenance and Repair <i>ORCAA Rule 8.8</i>	ORCAA Rule 8.8 requires that all air contaminant sources keep any process and/or air pollution control equipment in good operating condition and repair.	Applicable
Emissions Detrimental to Persons or Property <i>WAC 173-400-040(6) & ORCAA 7.6</i>	Prohibits emissions of any air contaminant from any source that are detrimental to persons or property.	Applicable
Fallout Prohibition <i>WAC 173-400-040(3) & ORCAA 8.3(e)</i>	Prohibits particulate emissions 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 was deposited.	Applicable
Odor Control and Prohibitions <i>ORCAA Rule 8.5</i>	ORCAA Rule 8.5 contains general requirements for controlling odors and a general prohibition of odors that unreasonably interfere with the use or enjoyment of a person's property.	Applicable
Record Keeping and Reporting <i>ORCAA Rule 8.11</i>	Requires the following: 1. Maintenance of records on the nature and amounts of emissions and other related information as deemed necessary by ORCAA; 2. Reporting of emissions to ORCAA upon request.	Applicable

Table 5: Relevant Performance Standards Determined Inapplicable

Regulation Title Citation	Relevant Performance Standard Determined Inapplicable	Basis
MACT: National Emission Standards for Wood Furniture Manufacturing Operations <i>40 CFR Part 63, Subpart JJ</i>	Implementing the FCAA, this standard establishes operational standards and recordkeeping requirements for facilities engaged in wood furniture manufacturing operations at major sources of HAP.	Rogers is not a major source of HAP.

<p>MACT: Plywood and Composite Wood Products Manufacturers</p> <p>40 CFR Part 63, Subpart DDDD</p>	<p>Implementing the FCAA, this standard establishes national compliance options, operating requirements, and work practice requirements for HAP emitted from plywood and composite wood products manufacturing facilities.</p>	<p>Rogers is not a major source of HAP.</p>
<p>MACT: National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products</p> <p>40 CFR Part 63, Subpart QQQQ</p>	<p>Implementing the FCAA, this standard establishes national compliance options, operating requirements, and work practice requirements for HAP emitted from surface coating of wood building products.</p>	<p>Rogers is not a major source of HAP.</p>
<p>MACT: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources</p> <p>40 CFR Part 63, Subpart HHHHHH</p>	<p>National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources</p>	<p>Rogers does not spray-apply materials containing any of the listed 'target HAP', nor do they use Methylene Chloride for paint stripping activities at the Facility.</p>

11. Best Available Control Technology (BACT)

ORCAA Rule 6.1.4(a)(2) and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6, require the finding that a new source or modification to an existing source of air pollution in an attainment or unclassifiable area will employ best available control technology for all pollutants (BACT) not previously emitted or whose emissions would increase as a result of the new source or modification.

New sources of air pollution and modifications to existing sources of air pollution are required to use BACT to control all pollutants not previously emitted, or those for which emissions would increase as a result of the new source or modification. BACT is defined in WAC 173-400-030 as, *“an emission limitation based on the maximum degree of reduction for each air pollutant subject to regulation under chapter 70A.15 RCW emitted from or which results from any new or modified stationary source, which the permitting authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes and available methods, systems, and techniques, including fuel cleaning, clean fuels, or treatment or innovative fuel combustion techniques for control of each pollutant.”*

ORCAA staff determined that the BACT determination from 19NOC1366 is sufficient. The spray booth must:

- Have an exhaust rate sufficient to capture all overspray;
- Be equipped with particulate filters with average efficiency of at least 98%; and
- Exhaust vertically at least 6 feet above the peak of the roof height.

12. Ambient Impact Analysis (Criteria Pollutants)

ORCAA's Rule 6.1.4(a)(3) and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6, require emissions from any new stationary source or modification not delay the attainment date of an area not in attainment, nor cause or contribute to a violation of any Ambient Air Quality Standard (AAQS). ORCAA's current Dispersion Modeling Guidance (2009) recommends this approval criteria be demonstrated using dispersion modeling techniques when Potential to Emit (PTE) of any pollutant with an ambient standard is above ORCAA's adopted significant emission level for the pollutant. Any pollutant with a PTE below its significant emission level can be considered insignificant with respect to maintaining the AAQs.

There will be no significant increases in PTE of criteria pollutants for this permitting action, therefore ORCAA staff consider this criterion satisfied.

13. Ambient Impact Analysis (Toxic Air Pollutants)

Washington's regulation titled Controls for New Sources of Toxic Air Pollutants (Air Toxics Rule) under Chapter 173-460 of the Washington Administrative Code applies to new stationary sources of Toxic Air Pollutants (TAP), including modifications to existing emissions units that increase TAP. The purpose of the Air Toxics Rule is to, "... maintain such levels of air quality as will protect human health and safety." The TAPs covered under the Air Toxics Rule include carcinogens and non-carcinogens. TAP emissions increases for determining applicability are the increases attributable to the new or modified emissions unit - Decreases from existing emissions units are not allowed to be subtracted from project-attributable TAP increases when determining applicability. Also, the Air Toxics Rule provides that review of modifications are limited to the emission unit or units proposed to be modified and the TAPs whose emissions would increase as a result of the modification.

The Air Toxics Rule has two independent requirements for new sources and modifications that increase TAP emissions above de-minimis levels:

- 1) **tBACT:** The new or modified emission units must use Best Available Control Technology to control TAP emissions (WAC 173-460-040(3)(a)).
- 2) **Ambient Impact:** The NOC application must demonstrate that any increase in TAP from the new or modified emission units are sufficiently low to protect human health and safety from potential carcinogenic and/or other toxic effects (WAC 173-460-070).

tBACT

The tBACT requirement applies to any new or modified emission units that triggers the Air Toxics Rule (results in a TAP increase above de-minimis levels), regardless of facility-wide or "net" TAP emissions. The term tBACT means Best Available Control Technology, as that term is defined in WAC 173-400-030, but applied to control of TAP (see BACT definition in Section 11).

ORCAA staff determined that the BACT determination outlined above is also appropriate for meeting tBACT.

Ambient Impact Review

The Air Toxics Rule provides a multi-tiered, screening approach under WAC 173-460-080 to assess health impacts and demonstrate compliance with the ambient impact requirement

under WAC 173-460-070, which is that TAP increases must be sufficiently low to protect human health and safety from potential carcinogenic and/or other toxic effects.

The “First Tier Review” (Tier 1 Review) is a two-step process. First, the emissions increase of each TAP is compared to its unique Small Quantity Emission Rate (SQER). SQERs are listed for each TAP under WAC 173-460-150. An SQER is the level of emissions of a TAP below which dispersion modeling is not required to demonstrate compliance with the ambient impact requirement. TAP emissions increases used in this first step must be based on the maximum potential to emit considering control or reduction in emissions achievable using the air pollution control technology or methods proposed to meet the tBACT requirement. Any TAP with an increase below its SQER can be presumed to be in compliance with the ambient impact requirement. If this is the outcome, further analysis is not required for that TAP. However, TAPs with emissions increases above their SQER must undergo the second step of the Tier 1 Review.

The second step of the Tier 1 Review requires evaluating TAP impacts against Acceptable Source Impact Levels (ASIL) and is referred to as an ASIL Analysis. An ASIL is the adopted health-based concentration for a TAP below which can be presumed as meeting the ambient impact requirement of WAC 173-460-070. ASILs are provided for each TAP under WAC 173-460-150. An ASIL analysis typically involves using an ambient air dispersion model to estimate ambient concentrations resulting from TAP emissions increases and considering air dispersion and local meteorological characteristics of the source. If the modeled impact of the increase in emissions of a TAP does not exceed its corresponding ASIL, the ambient impact requirement of WAC 173-460-070 may be considered met and the First Tier Review is completed for that TAP.

Emissions rates used to support an ASIL Analysis must be based on the maximum potential to emit considering control or reduction in emissions achievable using the air pollution control technology or methods proposed to meet the tBACT requirement. In addition, the Air Toxics Rule allows TAP reductions from existing emission units not subject to review to be subtracted or “netted out” from TAP increases, provided the reductions are included in the approval order as enforceable voluntary emission limits and meet all the requirements of WAC 173-460-071. These requirements include:

- (1) The voluntary emissions reductions must be enforceable through a regulatory order issued by the air permitting agency.
- (2) The approval order enforcing the voluntary emissions reductions must include monitoring, recordkeeping, and reporting requirements sufficient to ensure the reductions are maintained.
- (3) The agency’s preliminary determination to approve the voluntary emissions reductions are subject to a 30-day public notice and comment period and opportunity for a public hearing.

For pollutants with ambient concentrations found to be greater than their ASIL, a “Second Tier Review” (Tier 2 Review) by the Washington Department of Ecology (Ecology) is required. An application for a Tier 2 Review by Ecology is referred to a Tier 2 petition. Tier 2 petitions must include a Health Impacts Assessment (HRA) and estimated ambient TAP impacts based on refined air dispersion modeling. Ecology will not act on a Tier 2 petition unless a written preliminary determination on the NOC application for the new or modified TAP source and a draft approval order have been completed by the local agency with jurisdiction. Ecology’s

review and approval of a Tier 2 petition is contingent on a finding that TAP impacts meet the ambient impact requirement of WAC 173-460-070 that increases in TAP emissions are sufficiently low to protect human health and safety from potential carcinogenic and/or other toxic effects. If Ecology recommends denial of a Tier 2 petition, the permitting authority may not approve the project. The applicant then has the option of submitting a petition for a “Third Tier Review” (Tier 3 Review) by Ecology and a request for a risk management decision.

For this review (23NOC1602) ORCAA staff reviewed SDS and usages rates of products provided and compared the composition and usage rates to what was reviewed in 19NOC1366. ORCAA’s review focused on increases of existing TAP emissions, or emissions of TAPs not reviewed under 19NOC1366 to ensure compliance with Chapter 173-460 WAC; those emissions are summarized below and denoted with a “*” if the TAP was not reviewed in 19NOC1366.

Table 6: Tier I SQER Analysis

TAP Name	SQER (lbs/averaging period)	Emissions (lbs/period)	Pass/ Fail
Ethylbenzene	65/year	114/12-months	Fail
Isopropanol	5.9/hr	0.14/hr	Pass
Methyl Ethyl Ketone*	370/day	0.1/day	Pass
Silica (Crystalline Respirable)	0.22/day	0.0037/day	Pass
Xylenes (isomers and mixture)*	16/day	0.75/day	Pass

*A new TAP that was not reviewed in 19NOC1366

All TAP emissions, or expected increases in TAP emissions, are below their corresponding SQER, with the exception of ethylbenzene. ORCAA staff used a screening-level air dispersion model (AERSCREEN) to estimate ethylbenzene impacts at the ambient air boundary to compare against the ASIL. Using information provided in the application and BACT/tBACT parameters, ORCAA concluded the modeled impact of the increase in emissions of ethylbenzene does not exceed its corresponding ASIL. Therefore, the ambient impact requirement of WAC 173-460-070 may be considered met.

14. Requirements for Major Stationary Sources and Major Modifications to Major Stationary Sources

Projects that are major stationary sources and major modifications to major stationary sources as defined in 40 CFR 52.21(b) may be subject to permitting requirements under WAC 173-400-700 through 173-400-860.

Rogers is not a “Major Stationary Source” as defined in 40 CFR 52.21(b) and not subject to the permitting program required by WAC 173-400-700 through WAC 173-400-860. Therefore, these permitting requirements do not apply.

15. Title V Air Operating Permit (AOP) Implications

The State of Washington program pursuant to Title V of the federal Clean Air Act is governed under Chapter 173-401 WAC, the Washington Air Operating Permit Program. Chapter 173-401 WAC requires existing major stationary sources to operate in compliance with an approved Air Operating Permit (AOP). Major stationary sources are those stationary sources with a potential to emit which is greater than 100 tons per year of any criteria pollutant, greater than 10 tons per year of any hazardous air pollutants (HAP), or greater than 25 tons per year of any combination of HAP.

Rogers is not a “Major Source” under the Title V program and is not subject to the requirement to operate under an AOP.

16. Conditions of Approval

The following conditions of approval were determined necessary for assuring compliance with applicable air regulations and standards and protecting air quality. Recommended conditions of approval will become effective once the Approval Order is issued, and will supersede the past Approval Order issued by ORCAA for this facility, NOC# 19NOC1366:

- 1. Approved Coating Operations.** The application of wood finishes to millwork products such as, but not limited to, doors, cabinets, stairs, banisters, furniture, molding and mantels, as described in Notice of Construction application Nos. 23NOC1602, 19NOC1366, and their respective associated Final Determinations, is approved for construction and operation subject to conditions in this Order of Approval.
[Regulatory Basis: ORCAA 6.1(a); ORCAA 6.1.2(l); 40 CFR part 52.2470(c), Table 6]
- 2. Approved Spray Equipment.** The owner or operator is approved to apply wood finishes. All spray coating operations must be conducted within the spray booth identified in Table 1 and in accordance with conditions in this Order of Approval. Prior approval by ORCAA may be required for the following as specified in ORCAA Rule 6.1:
 - a. Construction, installation, or establishment of any stationary source;
 - b. Modification to any existing stationary source;
 - c. Replacement or substantial alteration of emission control technology installed on an existing stationary source;
 - d. Deviations from the approved plans, drawings, data, and specifications of the stationary sources listed in Table 1; or,
 - e. Using any new VOC-containing material (paints, lacquers, stains, solvents) that would result in emissions of a new Toxic Air Pollutant (TAP) or a significant increase in TAPs already emitted.

Table 1: Approved Equipment

Emission Unit	Specifications:	Air Pollution Controls
EU1 – Spray Booth	<ul style="list-style-type: none">• Manufacturer: Global Finishing Solutions• Serial #: U129271-A• Manf. Date: 7/21/2021	<ul style="list-style-type: none">• Stack release point at least 6’ above the peak height of the building

	<ul style="list-style-type: none"> • Open table/bench updraft, 3-walls • Not heated • Filter system with average efficiency of at least 98% 	<ul style="list-style-type: none"> • Exhaust filtration system with combined filtration efficiency of at least 98%
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[Regulatory Basis: ORCAA 6.1(a); ORCAA 6.1.2(I); WAC 173-400-110(2); WAC 173-400-111(10)]

3. Cumulative Material Use Limits. The cumulative amounts of materials applied during any 12-consecutive month period must not exceed:

- a. 3,500 gallons for all materials containing volatile organic compounds (VOC Containing Materials). VOC Containing Materials include, but are not limited to, pre-treatment washes, stripping and cleaning products, primers, topcoats, clearcoats, lacquers, stains, varnish, shellac, binders, reducers, activators, hardeners, fillers, tints, sealers, putties, polishes and thinners.
- b. 630 gallons for all materials containing Propylene Glycol (CAS 57-55-6); and,
- c. 1,100 gallons for all materials containing Ethylbenzene (CAS 100-41-4).

[Regulatory Basis: ORCAA 6.1.4(a)(1) and (5); ORCAA 7.6; WAC 173-460-070]

4. Stack Requirements: The exhaust stack of the spray booth must have a vertical discharge to the atmosphere at least six feet above the peak height of the building. There must be no flow obstructions at the point of discharge (i.e., cap). However, a weatherproof stack exhaust configuration that does not obstruct the air flow as it exits the stack is acceptable.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2); WAC 173-460-040(3)]

5. Operation & Maintenance Requirements: The following is required:

- a. Only high-volume low-pressure (HVLP), electrostatic, airless, air-assisted airless equipment, or an equivalent technology capable of at least 65% transfer efficiency, is permitted for spray application of VOC Containing Materials.
- b. Approved spray booth must be equipped with properly seated exhaust filters that cover all openings of the exhaust plenum and are rated at least 98 percent efficient.
- c. Hand cleaning of gun parts in a solvent container by flushing solvent through the gun without atomizing the solvent and paint residue or using a fully enclosed spray gun washer.
- d. Keeping VOC Containing Materials in closed containers when not in use.
- e. Operating and maintaining the spray booth consistent with the manufacturer's recommendations.
- f. Storing all solvents, solvent-containing cloths, or other materials used for surface preparation in closed, airtight containers.
- g. Minimizing and promptly cleaning up all VOC Containing Material spills and leaks.
- h. Ensuring that filters are properly seated and cover all openings of the exhaust plenum of the spray booth.
- i. Monitoring filters on a regular basis and replacing whenever damaged or loaded with particulate build-up to an extent that jeopardizes the effectiveness of the spray booth in capturing and controlling emissions.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); ORCAA Rule 8.8; ORCAA Rule 4.3(g); 40 CFR part 52.2470(c), Table 6]

6. Material Use and Composition Monitoring:

- a. Compliance with Condition #3 must be monitored at least monthly by summing the actual gallons used over the previous 12-consecutive month period of VOC containing materials, materials containing propylene glycol (CAS# 57-55-6), and materials containing ethylbenzene (CAS# 100-41-4).
- b. The owner or operator must monitor and maintain record of the composition of all VOC-containing materials used.

[Regulatory Basis: ORCAA 6.1.4(a)(2); 40 CFR Part 52.2470(c), Table 6]

7. Recordkeeping: Copies of records must be kept on-site and in a printed or electronic form for at least 5 years. At a minimum, records must include the following:

- a. Purchase invoices or usage records for all finishes and other VOC Containing Materials applied including the date of purchase and corresponding product identification numbers.
- b. Safety Data Sheets (SDS) for all finishes and other VOC Containing Materials on site associated with coating operations.
- c. Records sufficient to verify the average overspray arrestance (filtration) ratings of each exhaust filter type. Published filter efficiency data provided by filter vendors or laboratories may be used to demonstrate compliance with this requirement.
- d. Records of consecutive 12-month totals to demonstrate compliance with the cumulative material use limits outlined in Condition #3.

[Regulatory Basis: ORCAA 8.11; 40 CFR part 52.2470(c), Table 6]

17. Final Determination to Approve

This Final Determination documents ORCAA staff's determinations with respect to the applicable criteria of approval in ORCAA Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6. ORCAA staff recommends approval of Rogers' after the fact spray booth replacement and increases in potential emissions, provided the conditions identified in Section 16 of this Final Determination are implemented through an enforceable Order of Approval (AKA: Air Permit). Emissions calculations, modeling summary and other data supporting this Final Determination are provided as attachments.

~ end of section ~

 10/6/2023

PREPARED BY: Lauren Whybrew

Date



10/31/2023

REVIEWED BY: Mark Goodin, PE

Date

Attachments

Applicable Performance Standards that apply to Rogers Paint Group LLC

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	Applies to
Registration ORCAA Regulation 4	Requires facilities that are minor sources of emissions to register annually with ORCAA and pay annual registration fees.	Rogers will continue to be a minor source requiring registration.
Annual Registration Fees ORCAA Rule 3.1	Requires payment of annual registration fees to ORCAA based in part on air pollutants emitted during the previous year.	Rogers will continue to be a minor source requiring registrations and payment of annual registration fees.
Initial Notification ORCAA Rule 4.3(a)&(b); 4.3(f)	Requires facilities subject to registration to register by submitting an initial notification with the information in ORCAA Rule 4.3(b) within 30 days from: 1) Commencement of operation of any new or recommissioned stationary source; 2) Change in ownership of existing registered stationary source. The notification must be signed by the owner or operator or by the agent appointed by the owner.	Rogers will continue to be a registered minor source and is subject to this notification requirement.
Administrative Change Notification ORCAA Rule 4.3(e); 4.3(f)	Requires facilities to notify ORCAA of any changes to administrative information within 30 days from the change taking place including, but not limited to, contact names, address, phone numbers, and permanent shut down or decommissioning of a stationary source. The notification must be signed by the owner or operator or by the agent appointed by the owner.	Rogers will continue to be a registered minor source and is subject to this notification requirement.
Annual and/or Periodic Reports ORCAA Rule 4.3(c)&(d); 4.3(f)	Requires stationary sources to submit reports with information directly related to the registration program when requested by the Agency within 30 days of receipt of the request. The submittal must be signed by the owner or operator or by the agent appointed by the owner.	Rogers will continue to be a registered minor source and is subject to this reporting requirement.
Interference or Obstruction ORCAA Rule 7.1	Prohibits willfully interfering with or obstructing the Executive Director or any Agency employee in performing any lawful duty.	Applies generally to all air pollution sources
False or Misleading Statements ORCAA Rule 7.2	Prohibits any person from willfully making a false or misleading statement to the Board or its representative as to any matter within the jurisdiction of the Board.	Applies generally to all air pollution sources
Unlawful Reproduction or Alteration of Documents ORCAA Rule 7.3	Prohibits reproducing or altering, or causing to be reproduced or altered, any order, registration certificate or other paper issued by the Agency if the purpose of such reproduction or alteration is to evade or violate any provision of these Regulations or any other law.	Applies generally to all air pollution sources
Display of Orders and Certificates ORCAA Rule 7.4	Any order or registration certificate required to be obtained by these Regulations must be available on the premises designated on the order or certificate. In the event that the Agency requires	The Approval Order issued in conjunction with this NOC approval must be retained on site.

Attachments

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	Applies to
	order or registration certificate to be displayed, it must be posted. It is unlawful for any person to mutilate, obstruct or remove any order or registration certificate unless authorized to do so by the Board or the Executive Director.	
General Requirements WAC 173-400-040(1)(c) ORCAA Rule 8.3	All emissions units are required to use reasonably available control technology (RACT).	Applies generally to all air pollution sources.
Visible Emissions WAC 173-400-040(2) ORCAA Rule 8.2(a)	Prohibits emissions with opacity of greater than 20% for more than three (3) minutes in any one hour.	Applies generally to all air pollution sources
Sulfur Dioxide WAC 173-400-040(7)	No person shall cause or allow the emission from any emissions unit in excess of one thousand ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based on the average of any period of sixty consecutive minutes.	Applies generally to facilities that emit Sulfur Dioxide.
Control Equipment Maintenance and Repair ORCAA Rule 8.8	ORCAA Rule 8.8 requires that all air contaminant sources keep any process and/or air pollution control equipment in good operating condition and repair.	Applies generally to all air pollution control devices.
Fallout WAC 173-400-040(3) ORCAA Rule 8.3(e)	Prohibits particulate emissions 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 was deposited.	Applies generally to all air pollution sources.
Fugitive Emissions WAC 173-400-040(4)(a) ORCAA Rule 8.3(c)	The owner or operator of any emissions unit engaging in materials handling, construction, demolition, or other operation which is a source of fugitive emission must take reasonable precautions to prevent the release of air contaminants from the operation.	Applies generally to any activity that results in fugitive emissions.
Odor WAC 173-400-040(5) ORCAA Rule 8.5	ORCAA Rule 8.5 contains general requirements for controlling odors and a general prohibition of odors that unreasonably interfere with the use or enjoyment of a person's property.	Applies generally to all air pollution sources.
Emissions Detrimental to Persons or Property WAC 173-400-040(6) ORCAA Rule 7.6	Prohibits causing or allowing the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business.	Applies generally to all air pollution sources
Concealment and Masking WAC 173-400-040(8) ORCAA Rule 7.5	Prohibits installation or use of any device or means to conceal or mask emissions of an air contaminant, which causes detriment to health, safety, or welfare of any person, or causes damage to property or business.	Applies generally to all air pollution sources
Fugitive Dust WAC 173-400-040(9)	The owner or operator of a source or activity that generates fugitive dust must take reasonable precautions to prevent that fugitive dust from	Applies to any activity that results in fugitive dust.

Attachments

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	Applies to
	becoming airborne and must maintain and operate the source to minimize emissions.	
Excess Emissions Provisions WAC 173-400-107; WAC 173-400-108 ORCAA 8.7	Requires excess emissions be reported to the Agency as soon as possible and within 24 hours and establishes criteria qualifying excess emissions as unavoidable.	Applies generally to all air pollution sources
Record Keeping and Reporting. ORCAA Rule 8.11	Requires the following: 1. Maintenance of records on the nature and amounts of emissions and other related information as deemed necessary by ORCAA; 2. Reporting of emissions to ORCAA upon request.	Required of all facilities registered with ORCAA.

6/30

OLYMPIC REGION CLEAN AIR AGENCY

2940 Limited Lane NW - Olympia, Washington 98502 - 360-539-7610 – Fax 360-491-6308

FORM 1- NOTICE OF CONSTRUCTION

TO CONSTRUCT - INSTALL - ESTABLISH OR MODIFY AN AIR CONTAMINANT SOURCE

Form 1 Instructions:

1. Please complete all the fields below. **This NOC application is considered incomplete until signed.**
2. If the application contains any confidential business information, please complete a Request of Confidentiality of Records (www.orcaa.org/forms).
3. Duty to Correction Application: An applicant has the duty to supplement or correct an application. Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application must, upon becoming aware of such failure or incorrect submittal, promptly submit supplementary factors or corrected information.

Business Name: Rogers Paint Group, LLC	For ORCAA use only
Mailing Address: PO Box 2024, Port Townsend, WA 98368	File No: 407 County No: 31 Source No: 95 Application No: 23NOC1602
Physical Address of Project or New Source: 151 W. Fredericks St., Port Townsend, WA 98368	Date Received: <div style="text-align: center; color: red; font-weight: bold;"> Received JUL 03 2023 ORCAA </div>
Billing Address: PO Box 2024, Port Townsend, WA 98368	
Project or Equipment to be installed/established: Dust Collection - Updraft Spray Booth	
Anticipated startup date: <u>03/05/2020</u> Is facility currently registered with ORCAA? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
This project must meet the requirements of the State Environmental Policy Act (SEPA) before ORCAA can issue final approval. Indicate the SEPA compliance option: <input type="checkbox"/> SEPA was satisfied by _____ (government agency) on ___/___/___ (date) - Include a copy of the SEPA determination <input type="checkbox"/> SEPA threshold determination by _____ (government agency) is pending - Include a copy of the environmental checklist <input checked="" type="checkbox"/> ORCAA is the only government agency requiring a permit - Include ORCAA Environmental Checklist <input type="checkbox"/> This project is exempt from SEPA per _____ (WAC citation).	
Name of Owner of Business: Ethan Rogers	Agency Use Only
Title: <u>owner</u>	CONDITIONALLY APPROVED FOR CONSTRUCTION ONLY IN ACCORDANCE WITH RCW 70A.15, WAC 173-400 ORCAA REGULATIONS (SEE ATTACHED ADDENDUM FOR CONDITIONS OF APPROVAL) <u>10/31/2023</u> DATE ORCAA
Email: <u>rogerspaintgroup@gmail.com</u> Phone: <u>360 821 9918</u>	
Authorized Representative for Application (if different than owner):	
Title:	
Email: Phone:	
I hereby certify that the information contained in this application is, to the best of my knowledge, complete and correct.	
Signature of Owner or Authorized Representative: (sign in Blue Ink)	
	Date: <u>6/30/23</u>
IMPORTANT: Do not send via email or other electronic means. ORCAA must receive Original, hardcopy, signed application and payment prior to processing application.	