CERTIFICATION OF REPORTS BY A RESPONSIBLE OFFICIAL

1. Facility/Source Name: Paneltech
2. Company Name (if different): Paneltech International, LLC
3. ORCAA Source ID #: 145, Facility SIC Code 2672,2821
4. Unified Business Identification Number: 603 261 1841
5. Company Owner: Corporation
6. Parent Company: Paneltech International, LLC
7. Environmental Contact for this submittal:

   Raeanne Wolfley (name) | EHS Manager (title) | 360-538-1480x129 (phone #)
8. Mailing Address:

   2999 John Stevens Way, Hoquiam, WA 98550

9. **Identification of Report Covered by this Certification:** *Identify the exact report that is certified as being true and accurate under this certification. Please identify the period of time covered by the report and specify any extraneous materials that are not covered by the certification.*

a. Specify the period of time covered by the report: n/a

b. Specify the Type or Name of Report:

- ☐ Annual Compliance Certification
- ☐ Semiannual Monitoring Report
- ☐ Permit Deviation Report(s)
- ☐ Annual Emissions Inventory (must include calculations and supporting data)
- ☐ Stack Testing Results (Within 60 days from conducting the testing)
- ☒ Other. Specify: Amino Reactor Kettle NOC

c. Please specify by page number any sections of the report not covered by this certification which are provided as background information and are not necessary to support the statements and information which are certified:

10. **Certification:**

By my signature below, I certify that all information and statements in the accompanying report, which is identified in item #9 above, including all attachments, are true, accurate, and complete to the best of my knowledge. Deviation reports and excess emission reports filed during the reporting period are certified as true, accurate, and complete.

signature — 12/6/23 (date)

General Manager (title)

Dave Wentworth (printed name)

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).
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:
Paneltech International, LLC

Mailing Address:
2999 John Stevens Way, Hoquiam WA, 98550

Physical Address of Project or New Source:
2999 John Stevens Way, Hoquiam WA, 98550

Billing Address:
2999 John Stevens Way, Hoquiam WA, 98550

For ORCAA use only

File No: 145
County No: 27
Source No: 80
Application No: 23NOC1626

Date Received:
Received
DEC 08 2023
ORCAA

Project or Equipment to be installed/established:

Amino Reactor Kettle

Anticipated startup date: 02 / 15 / 2024 Is facility currently registered with ORCAA? Yes ☑ No ☐

This project must meet the requirements of the State Environmental Policy Act (SEPA) before ORCAA can issue final approval. Indicate the SEPA compliance option:

- ☐ SEPA was satisfied by _____ (government agency) on ___/___/___ (date) - Include a copy of the SEPA determination
- ☑ SEPA threshold determination by City of Hoquiam (government agency) is pending - Include a copy of the environmental checklist
- ☐ ORCAA is the only government agency requiring a permit - Include ORCAA Environmental Checklist
- ☐ This project is exempt from SEPA per _____ (WAC citation).

Name of Owner of Business:
Dave Wentworth

Title: General Manager

Email: dwentworth@paneltechintl.com Phone: 360-538-1480

Authorized Representative for Application (if different than owner):
Raeanne Wolfley

Title: EHS Manager

Email: rwolfley@paneltechintl.com Phone: 360-538-1480

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)

Raeanne Wolfley **Date:** 12/6/2023

IMPORTANT: Do not send via email or other electronic means. ORCAA must receive Original, hardcopy, signed application and payment prior to processing application.

Agency Use Only

OLYMPIC REGION CLEAN AIR AGENCY

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

FORM 1D- Contact Information

Business Name Paneltech International, LLC	**FOR ORCAA USE**
	FILE # 145
Physical Site Address (Street address, city, state, zip) 2999 John Stevens Way, Hoquiam, WA, 98550	**CTY #** 27
	SRC # 80
	Date Received Received DEC 08 2023 ORCAA
Previous Business Name (if applicable) Little Green	

Contact Information

Inspection Contact	
Name Raeanne Wolfley	Title EHS Manager
Phone 360-538-1480	Email rwolfley@paneltechintl.com
Billing Contact	
Name Mickey Thurman	Title Accountant
Phone 360-538-1480	Email mthurman@paneltechintl.com
Emission Inventory Contact	
Name Raeanne Wolfley	Title EHS Manager
Phone 360-538-1480	Email rwolfley@paneltechintl.com
Complaint Contact	
Name Raeanne Wolfley	Title EHS Manager
Phone 360-538-1480	Email rwolfley@paneltechintl.com
Permit Contact	
Name Raeanne Wolfley	Title EHS Manager
Phone 360-538-1480	Email rwolfley@paneltechintl.com

The **inspection contact** is the on-site person responsible for the everyday operation of the site and is available for inspections.
The **billing contact** is the person invoices are sent.
The **emission inventory contact** is the person requests for emissions information and material use information are sent.
The **complaint contact** is the person who receives and responds to complaints received on-site and who is contacted regarding complaints ORCAA receives.
The **permit contact** is the person responsible for filling out permit applications and receiving approval from ORCAA.

CERTIFICATION OF REPORTS BY A RESPONSIBLE OFFICIAL

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a. Specify the period of time covered by the report: NOC/NOI Request

b. Specify the Type or Name of Report:

- ☐ Annual Compliance Certification
- ☐ Semiannual Monitoring Report
- ☐ Permit Deviation Report(s)
- ☐ Annual Emissions Inventory (must include calculations and supporting data)
- ☐ Stack Testing Results (Within 60 days from conducting the testing)
- ☐ Other. Specify: Upgraded Melamine Kettle NOC/NOI request

c. Please specify by page number any sections of the report not covered by this certification which are provided as background information and are not necessary to support the statements and information which are certified:

10. **Certification:**

By my signature below, I certify that all information and statements in the accompanying report, which is identified in item #9 above, including all attachments, are true, accurate, and complete to the best of my knowledge. Deviation reports and excess emission reports filed during the reporting period are certified as true, accurate, and complete.

signature — 11/27/23 (date)

General Manager (title)

Dave Wentworth (printed name)

Olympic Region Clean Air Agency

Public Records Officer •2940 B Limited Lane NW•Olympia, WA 98502
Phone (360) 539-7610•Fax (360) 491-6308•web site: www.orcaa.org

REQUEST FOR CONFIDENTIALITY OF RECORDS

Instructions:

1. Please complete a separate request form for each document.
2. You must submit two copies of any document that contains confidential information:
   CONFIDENTIAL COPY: The original document containing the confidential information. Write or stamp "CONFIDENTIAL" in red on both the cover page and on each page that contains confidential information.
   PUBLIC COPY: A copy of the original document with all confidential information redacted. Only the word(s) or number(s) that are confidential may be redacted. The identifier "CONFIDENTIAL" should not be on this document. This is the public record which will be released under a public records request. If you do not provide a public version the confidential status of the request will be in jeopardy.

Note: This completed form is an open public document and may be released to any requestor.

Source Information				ORCAA USE ONLY
Source Name: Paneltech International, LLC				**File No:** **County No:** **Source No:**
Site Address: 2999 John Stevens Way	**City:** Hoquiam	**State:** WA	**Zip:** 98550	**Date Received:** Received DEC 04 2023 ORCAA
Mailing Address: 2999 John Stevens Way	**City:** Hoquiam	**State:** WA		
Contact Name: Raeanne Wolfley	**Phone Number:** 360 538-1480	**Email:** rwolfley@paneltechintl.com		

Confidentiality Request

Document Name Upgraded Melamine Kettle Emission Information and Calculations

Term of Confidentiality Claim
The document should remain confidential

☒ Indefinitely*

☐ Until _____ (date)

* If, in the future, the information is no longer considered confidential by your company, it is your company's responsibility to inform ORCAA in writing of such changes.

Exemption Citation(s)
The following information are confidential based on the following exemption(s):

Page #	Location on the page (e.g. Redaction #1, 2, etc; Paragraph 1, Line 2)	Exemption Citation (see below)
1	Resin Recipe	RCW 70.94.205 Competitive Position
	Calculations for A and Cf	RCW 70.94.205 Competitive Position

Possible Exemption Citations

RCW 42.56.270(1) – *"Valuable formulae, designs, drawings, computer source code or object code, and research data"* (Note: This exemption is only valid for 5 years from the date of document submittal.)

RCW 70.94.205 Unique Process– Confidential information that *"relate to processes or production unique to the owner or operator"*

RCW 70.94.205 Competitive Position – Confidential information *"likely to affect adversely the competitive position of such owner or operator if released to the public or to a competitor"*

Page #	**Location on the page** (e.g. Redaction #1, 2, etc; Paragraph 1, Line 2)	**Exemption Citation** (see bottom of first page)

RESPONSIBLE OFFICIAL CERTIFICATION

I hereby certify that the information identified as confidential in the document named above are exempt from mandatory public disclosure and request that the information shall only be for the confidential use of the Olympic Region Clean Air Agency. I am aware that it is my responsibility to substantiate any confidentiality claim in the case of a challenge and I have reviewed the information EPA uses for substantiation in 40 CFR Part 2.204(e)(4). I am aware that if I knowingly direct or authorize the violation of any statute, I am personally liable for the penalties.

Responsible Official Name: Dave Wentworth	**Title:** Plant Manager
Responsible Official Signature:	**Date** 11/27/23

Responsible officials include a general partner or the proprietor (for partnership or sole proprietorship), president, secretary, treasurer or vice-president of a principal business function (for a corporation), duly authorized representative responsible for overall operation of a facility (for a corporation), or principal executive officer or ranking elected official (for a municipality, state, federal or other public agency).

ORCAA USE ONLY

- ☑ **Request approved as confidential**
- ☐ **Request approved as confidential per RCW 42.56.270(1) through (date):**
- ☐ **Request approved as confidential under different exemption:**
- ☐ **Request approved as confidential under different exemptions.** See attached report for determination.
- ☐ **Request partially approved as confidential with exceptions.** See attached report for determination.
- ☐ **Request denied (state reason)**

ORCAA Public Records Officer	**Date** 12/4/2023
Date of Notification of Denial	**Appeal Deadline**

Paneltech

Monday, November 27, 2023

2999 John Stevens Way Hoquiam, WA 98550
360.538.1480|www.paneltechintl.com

public copy

The estimated formaldehyde emissions from a batch of amino resin:

Resin Recipe:

1. [redacted].
2. [redacted].
3. [redacted].
4. [redacted].
5. [redacted].
6. [redacted].
7. [redacted].

Using the mass transfer coefficient approximation method of volatile compounds, we can estimate the amount of formaldehyde vapor that will be emitted during a batch.

$$\dot{m}_f = K_{OL} A C_f$$

Where;

$$\dot{m}_f \; is \; the \; mass \; flow \; rate \; of \; formaldehyde$$

$$K_{OL} \; is \; the \; liquid \; phase \; limited \; mass \; transfer \; coefficient$$

$$A \; is \; the \; surface \; area \; of \; the \; liquid - vapor \; interface$$

$$C_f \; is \; the \; liquid \; phase \; formaldehyde \; concentration \; (250 \; gal)$$

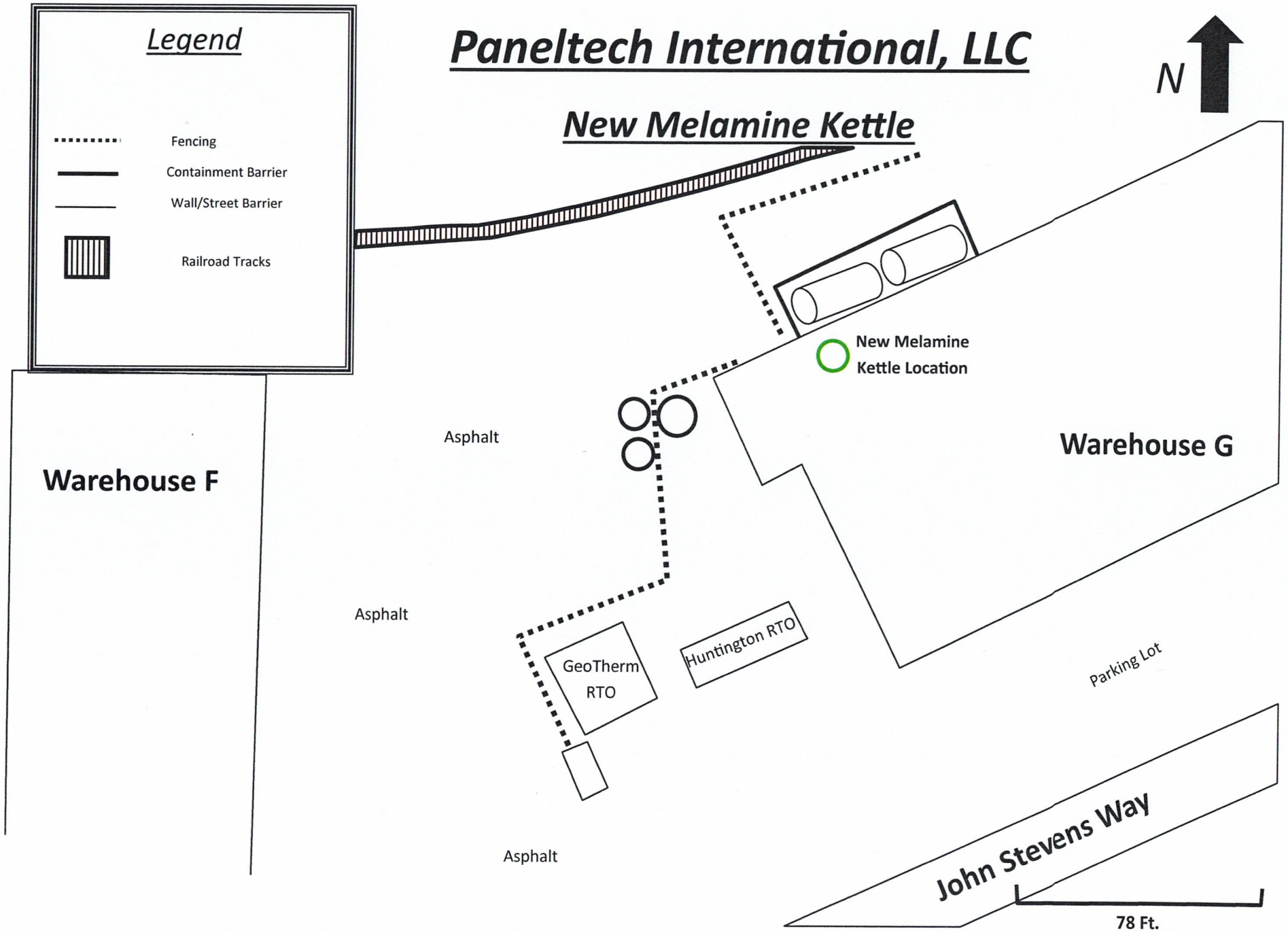
$$K_{OL} = 1.10 \times 10^{-4} \, {}^{m}/_{hour}$$

$$A = \pi r^2 = \pi$$ [redacted]

$$C_f =$$ [redacted]

$$\dot{m}_f = 1.10 \times 10^{-4} \, {}^{m}/_{hour} \times 8.8 \, m^2 \times 436.6 \, {}^{lbs}/_{m^3} = 0.42 \; {}^{lbs}/_{hour}$$

Each batch takes approximately 9 hours, resulting in a batch emission rate of 3.78 lbs. of formaldehyde per batch. At a maximum production rate of one batch per 11 hours, the annual estimated emission rate is 3,010.3lbs. per year. However, with at 96.86% destruction rate, the estimated total emissions would be 94.51 lbs. per year.


Legend
Fencing
Containment Barrier
Wall/Street Barrier
Railroad Tracks
Paneltech International, LLC
New Melamine Kettle
N
New Melamine
Kettle Location
Warehouse F
Warehouse G
Asphalt
Asphalt
Asphalt
GeoTherm
RTO
Huntington RTO
Parking Lot
John Stevens Way
78 Ft.

SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals:

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

A. Background [HELP]

1. Name of proposed project, if applicable:

Amino Resin Reactor (aka Melamine Kettle) Upgrade

2. Name of applicant:

Paneltech International, LLC

3. Address and phone number of applicant and contact person:

2999 John Stevens Way Hoquaim, WA 98550 360.538.1480

4. Date checklist prepared:

4/19/2023

5. Agency requesting checklist:

ORCAA

6. Proposed timing or schedule (including phasing, if applicable):

Project completion by February, 2024

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

Not at this time.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

Air emissions estimations are prepared for this project.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

No other approvals or applications are pending.

10. List any government approvals or permits that will be needed for your proposal, if known.

Noptice of Construction from ORCAA

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

Paneltech proposes to install a 8,000 lb. amino research reactor in it's existing Hoquiam location.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

2999 John Stevens Way Hoquiam, WA 98550 – Resin plant (SW corner of warehouse G)

B. Environmental Elements [HELP]

1. *Earth* [help]

a. General description of the site:

(circle one): Flat, rolling, hilly, steep slopes, mountainous, other _____

b. What is the steepest slope on the site (approximate percent slope)?

0%

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

Sand, top soil dirt. No soil will be moved for this project.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

No

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

No filling, excavation or grading is part of this project.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

No

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

No change in impervious ground.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

Not applicable.

2. Air [help]

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

No emissions would result from construction. After taking into account the GeoTherm's formaldehyde destruction rate of 96.86%, formaldehyde in the amount of 94.5 lbs./year (controlled) will result from operation of the reactor, an increase from 40.7lbs/year.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

There is a marijuana growing warehouse behind/adjacent to Paneltech; there are times when odors associated with that warehouse can be smelled on Paneltech property.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

THE KETTLE IS TIED TO THE RTO WHICH REDUCES EMISSIONS SIGNIFICANTLY.

3. Water [help]

a. Surface Water: [help]

1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

Fry Creek, Chehalis River, Grays Harbor

2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

No

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

None

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

No

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

Yes; the whole property that Paneltech operates on.

6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

No

b. Ground Water: [help]

a) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

No

a) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

NONE

c. Water runoff (including stormwater):

1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

No runoff. Project is in an already covered location.

a) Could waste materials enter ground or surface waters? If so, generally describe.

No

a) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

No

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

None/Not applicable, project is inside existing building.

4. Plants [help]

a. Check the types of vegetation found on the site:

____deciduous tree: alder, maple, aspen, other
____evergreen tree: fir, cedar, pine, other
____shrubs
__X__grass
____pasture
____crop or grain
____ Orchards, vineyards or other permanent crops.
____ wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
____water plants: water lily, eelgrass, milfoil, other
____other types of vegetation

a. What kind and amount of vegetation will be removed or altered?

None

a. List threatened and endangered species known to be on or near the site.

None

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

None

e. List all noxious weeds and invasive species known to be on or near the site.

None

5. Animals [help]

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site.

Examples include:

birds: hawk, heron, eagle, songbirds, other:
mammals: deer, bear, elk, beaver, other:
fish: bass, salmon, trout, herring, shellfish, other _____

Hawk, deer, heron, otter, geese, ducks, owl, coyote, trout.

b. List any threatened and endangered species known to be on or near the site.
None

c. Is the site part of a migration route? If so, explain.
No

d. Proposed measures to preserve or enhance wildlife, if any:
NONE/NOT APPLICABLE

e. List any invasive animal species known to be on or near the site.
None

6. Energy and Natural Resources [help]

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.
Electricity: manufacturing

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.
No

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:
None

7. Environmental Health [help]

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.
A spill of formaldehyde may occur as a result of this proposal in the maximum amount of 826 lbs.

1) Describe any known or possible contamination at the site from present or past uses.
None known

2) Describe existing hazardous chemicals/conditions that might affect project development

and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

None

3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.
Formaldehyde will be used during operation of the reactor.

4) Describe special emergency services that might be required.
Paneltech's Teir II plan already covers all emergency and spill related actions that would be necessary in the event of an accident.

5) Proposed measures to reduce or control environmental health hazards, if any:
Formaldehyde vapors will be routed to a control device with a minimum destruction efficiency of 95%

b. Noise

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?
Equipment noise

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

None above already existing noise levels.

3) Proposed measures to reduce or control noise impacts, if any:

None

8. Land and Shoreline Use [help]

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

This project will be constructed in an already existing building, no changes are expected to occur on nearby or adjacent properties.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

No

1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

No

c. Describe any structures on the site.

There are 4 existing warehouses at the location: Warehouses A, H, F and G. The proposed project will be located in Warehouse G.

d. Will any structures be demolished? If so, what? No

e. What is the current zoning classification of the site?
Industrial

f. What is the current comprehensive plan designation of the site?

g. If applicable, what is the current shoreline master program designation of the site?

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

i. Approximately how many people would reside or work in the completed project?
1 employee will operate the equipment. Approximately 52-60 employees work at the site.

j. Approximately how many people would the completed project displace?
0

k. Proposed measures to avoid or reduce displacement impacts, if any:
NONE

L. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

None

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:
None

9. Housing [help]

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.
None

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.
None

c. Proposed measures to reduce or control housing impacts, if any:

None

10. Aesthetics [help]

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

Inside an existing building

b. What views in the immediate vicinity would be altered or obstructed?

None

b. Proposed measures to reduce or control aesthetic impacts, if any:
None

11. Light and Glare [help]

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

None, inside an already existing building

b. Could light or glare from the finished project be a safety hazard or interfere with views?

No

c. What existing off-site sources of light or glare may affect your proposal?

No effect

d. Proposed measures to reduce or control light and glare impacts, if any:

None

12. Recreation [help]

a. What designated and informal recreational opportunities are in the immediate vicinity?

None

b. Would the proposed project displace any existing recreational uses? If so, describe.

No

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

None

13. Historic and cultural preservation [help]

a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers ? If so, specifically describe.

None

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources. None

c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

None

d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

None

14. Transportation [help]

a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

John Stevens Way, No impact, project is in an existing building.

b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

No

c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

None

d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

No

e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

No

f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

Less than 1.

g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

No

h. Proposed measures to reduce or control transportation impacts, if any:
None

15. Public Services [help]

a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.
No

b. Proposed measures to reduce or control direct impacts on public services, if any.
None

16. Utilities [help]

a. Circle utilities currently available at the site:
electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other _____

c. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.
None

C. Signature [HELP]

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: Raeanne Walkley

Name of signee Raeanne Walkley

Position and Agency/Organization EHS Manager - Paneltech

Date Submitted: 11/28/23

D. Supplemental sheet for nonproject actions [HELP]

(**IT IS NOT NECESSARY** to use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

Proposed measures to avoid or reduce such increases are:

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

3. How would the proposal be likely to deplete energy or natural resources?

Proposed measures to protect or conserve energy and natural resources are:

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

Proposed measures to protect such resources or to avoid or reduce impacts are:

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

Proposed measures to avoid or reduce shoreline and land use impacts are:

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

Proposed measures to reduce or respond to such demand(s) are:

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

Paneltech

Jennifer DeMay
Olympic Region Clean Air Agency
2940 Limited Lane NW
Olympia, WA 98502

December 29, 2023

Re: 23NOC1626 application addendum

Dear Ms. DeMay,

The requested information is included in this packet. As discussed previously, it was decided that even at running at full capacity, the amount of formaldehyde consumed would remain unchanged due to our limited storage capabilities preventing our ability to storage the assumed additional product.

Additionally, running at full capacity would equate to approximately the same amount of melamine currently produced; while the kettle is larger, this equates to simply not spending as much money or time making AS many mixes as we needed to to keep up with demand with the smaller kettle. The larger kettle simply makes processes and keeping up with demand more efficient on our end.

We hope this satisfies ORCAA's data request.

Sincerely,

Raeanne Wolfley

Raeanne Wolfley
Environmental, Health, and Safety Manager
Paneltech International, LLC
2999 John Stevens Way
Hoquiam, WA 98550
360.538.140x129
rwolfley@paneltechintl.com

Received
JAN 02 2024
ORCAA

CERTIFICATION OF REPORTS BY A RESPONSIBLE OFFICIAL

1. Facility/Source Name: Paneltech
2. Company Name (if different): Paneltech International, LLC
3. ORCAA Source ID #: 145, Facility SIC Code 2672,2821
4. Unified Business Identification Number: 603 261 1841
5. Company Owner: Corporation
6. Parent Company: Paneltech International, LLC
7. Environmental Contact for this submittal:

Raeanne Wolfley	EHS Manager	360-538-1480x129
name	title	phone #

8. Mailing Address:

2999 John Stevens Way, Hoquiam, WA 98550

9. **Identification of Report Covered by this Certification:** *Identify the exact report that is certified as being true and accurate under this certification. Please identify the period of time covered by the report and specify any extraneous materials that are not covered by the certification.*

a. Specify the period of time covered by the report: NOC/NOI Request Revised calculations.

b. Specify the Type or Name of Report:

- ☐ Annual Compliance Certification
- ☐ Semiannual Monitoring Report
- ☐ Permit Deviation Report(s)
- ☐ Annual Emissions Inventory (must include calculations and supporting data)
- ☐ Stack Testing Results (Within 60 days from conducting the testing)
- ☐ Other. Specify: revised Upgraded Melamine Kettle NOC/NOI request calculations

c. Please specify by page number any sections of the report not covered by this certification which are provided as background information and are not necessary to support the statements and information which are certified:

10. **Certification:**

By my signature below, I certify that all information and statements in the accompanying report, which is identified in item #9 above, including all attachments, are true, accurate, and complete to the best of my knowledge. Deviation reports and excess emission reports filed during the reporting period are certified as true, accurate, and complete.

Dave Wentworth 12-20-23

signature date

General Manager
title

Dave Wentworth
printed name

To whom it does concern,

Paneltech would like to request an NOC to install a larger amino acid reactor (melamine kettle). The kettle would replace the smaller, current melamine kettle in both location (next to the phenolic resin kettle in the resin plant) and functionality (making melamine resin). Paneltech would like to have the amino reactor functional by the end of February 2024. The kettle will be vented to the RTO.

As explained on the cover letter, Paneltech does not expect to see any increases in formaldehyde consumption.

Technical description is as follows:

Kettle specs:

- Cooling/Heating line (water/steam) Steel
  - External dimple jacket
  - Automated Valve (Supply) Cooling Water or Steam
  - Automated Valve (Return) Return to cooling Tower or condensate return Tank.
  - Atmospheric Vent to RTO Stainless Steel
  - Chemical addition Line- Stainless Steel
  - Weight capacity technology- Load Cells
  - 1200 Gallon maximum volume
  - 60" Diameter, 84" sidewall, domed bottom and top.

We hope this satisfies ORCAA's data request.

Raeanne Wolfley
EHS Manager
Paneltech
2999 John Stevens Way, Hoquiam, WA 98550

Olympic Region Clean Air Agency

Public Records Officer •2940 B Limited Lane NW•Olympia, WA 98502
Phone (360) 539-7610•Fax (360) 491-6308•web site: www.orcaa.org

REQUEST FOR CONFIDENTIALITY OF RECORDS

Instructions:

1. Please complete a separate request form for each document.
2. You must submit two copies of any document that contains confidential information:
   CONFIDENTIAL COPY: The original document containing the confidential information. Write or stamp "CONFIDENTIAL" in red on both the cover page and on each page that contains confidential information.
   PUBLIC COPY: A copy of the original document with all confidential information redacted. Only the word(s) or number(s) that are confidential may be redacted. The identifier "CONFIDENTIAL" should not be on this document. This is the public record which will be released under a public records request. If you do not provide a public version the confidential status of the request will be in jeopardy.

Note: This completed form is an open public document and may be released to any requestor.

Source Information				ORCAA USE ONLY
Source Name: Paneltech International, LLC				File No: 145 County No: 27 Source No: 80
Site Address: 2999 John Stevens Way	**City:** Hoquiam	**State:** WA	**Zip:** 98550	**Date Received:** Received JAN 02 2024 ORCAA
Mailing Address: 2999 John Stevens Way	**City:** Hoquiam	**State:** WA		
Contact Name: Raeanne Wolfley	**Phone Number:** 360 538-1480	**Email:** rwolfley@paneltechintl.com		

Confidentiality Request

Document Name Upgraded Melamine Kettle Emission Information and Calculations

Term of Confidentiality Claim
The document should remain confidential

☒ Indefinitely*

☐ Until _____ (date)

* If, in the future, the information is no longer considered confidential by your company, it is your company's responsibility to inform ORCAA in writing of such changes.

Exemption Citation(s)
The following information are confidential based on the following exemption(s):

Page #	**Location on the page** (e.g. Redaction #1, 2, etc; Paragraph 1, Line 2)	**Exemption Citation** (see below)
1	Resin Recipe	RCW 70.94.205 Competitive Position
	Calculations for A and Cf	RCW 70.94.205 Competitive Position

Possible Exemption Citations

RCW 42.56.270(1) – *"Valuable formulae, designs, drawings, computer source code or object code, and research data"* (Note: This exemption is only valid for 5 years from the date of document submittal.)

RCW 70.94.205 Unique Process– Confidential information that *"relate to processes or production unique to the owner or operator"*

RCW 70.94.205 Competitive Position – Confidential information *"likely to affect adversely the competitive position of such owner or operator if released to the public or to a competitor"*

Page #	**Location on the page** (e.g. Redaction #1, 2, etc; Paragraph 1, Line 2)	**Exemption Citation** (see bottom of first page)

RESPONSIBLE OFFICIAL CERTIFICATION

I hereby certify that the information identified as confidential in the document named above are exempt from mandatory public disclosure and request that the information shall only be for the confidential use of the Olympic Region Clean Air Agency. I am aware that it is my responsibility to substantiate any confidentiality claim in the case of a challenge and I have reviewed the information EPA uses for substantiation in 40 CFR Part 2.204(e)(4). I am aware that if I knowingly direct or authorize the violation of any statute, I am personally liable for the penalties.

Responsible Official Name: Dave Wentworth	**Title:** General Manager
Responsible Official Signature:	**Date** 12-20-23

Responsible officials include a general partner or the proprietor (for partnership or sole proprietorship), president, secretary, treasurer or vice-president of a principal business function (for a corporation), duly authorized representative responsible for overall operation of a facility (for a corporation), or principal executive officer or ranking elected official (for a municipality, state, federal or other public agency).

ORCAA USE ONLY

- ☑ **Request approved as confidential**
- ☐ **Request approved as confidential per RCW 42.56.270(1) through (date):**
- ☐ **Request approved as confidential under different exemption:**
- ☐ **Request approved as confidential under different exemptions.** See attached report for determination.
- ☐ **Request partially approved as confidential with exceptions.** See attached report for determination.
- ☐ **Request denied (state reason)**

ORCAA Public Records Officer	**Date** 1-19-2024
Date of Notification of Denial	**Appeal Deadline**

Paneltech

Wednesday, December 20, 2023

2999 John Stevens Way Hoquiam, WA 98550
360.538.1480|www.paneltechintl.com

Public copy

The estimated formaldehyde emissions from a batch of amino resin:

Resin Recipe:

1. [redacted].
2. [redacted].
3. [redacted].
4. [redacted].
5. [redacted].
6. [redacted].
7. [redacted].

Using the mass transfer coefficient approximation method of volatile compounds, we can estimate the amount of formaldehyde vapor that will be emitted during a batch.

$$\dot{m}_f = K_{OL} A C_f$$

Where;

$$\dot{m}_f \; is \; the \; mass \; flow \; rate \; of \; formaldehyde$$

$$K_{OL} \; is \; the \; liquid \; phase \; limited \; mass \; transfer \; coefficient$$

$$A \; is \; the \; surface \; area \; of \; the \; liquid - vapor \; interface$$

$$C_f \; is \; the \; liquid \; phase \; formaldehyde \; concentration \; (250 \; gal)$$

$$K_{OL} = 1.10 \times 10^{-4} \, {}^{m}/_{hour}$$

$$A = \pi r^2 = \pi$$ [redacted]

$$C_f =$$ [redacted]

$$\dot{m}_f = 1.10 \times 10^{-4} \, {}^{m}/_{hour} \times 8.8 \, m^2 \times 436.6 \, {}^{lbs}/_{m^3} = 0.42 \; {}^{lbs}/_{hour}$$

Each batch takes approximately 9 hours, resulting in a batch emission rate of 3.78 lbs. of formaldehyde per batch. At a maximum production rate of one batch per 11 hours, the annual estimated emission rate is 3,010.3lbs. per year. However, with a worst-case scenario 95% destruction rate, the estimated total emissions would be 150.515 lbs. per year.