

**REVISED ORDER OF APPROVAL
NOTICE OF AMENDMENT
24ADM1637 (Amends NOC# 19NOC1344)**

ISSUED TO E&L Coatings Northwest, LLC ON MAY 02 2024

This Order of Approval (“Order”) is issued in accordance with Olympic Region Clean Air Agency (“ORCAA”) Regulations and Chapter 173-400 of the Washington Administrative Code.

Conditional approval to construct the stationary sources of air pollution (“Approved Equipment”) at their spray coating facility located at 13313 Reeder Rd, SW in Tenino (“Approved Location”) for operation solely as described in the associated Notice of Construction (“NOC”) application No. 19NOC1344 is hereby GRANTED to E&L Coatings Northwest, 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current owners and operators of the equipment, and Applicant’s heirs, successors and assigns unless amended or superseded by a subsequent Order issued by ORCAA or unless the equipment is permanently shut down.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 Revised Code of Washington (RCW), 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 of Approval for NOC# 19NOC1344 and is GRANTED at the Approved Location, subject to the following Conditions of Approval:

- 1. Approved New Sources:** The new sources of air pollutant emissions as described in the following table and in Notice of Construction (NOC)# 19NOC1344 are approved for construction and operation at the spray coating facility located at 13313 Reeder RD in Tenino, Washington. Deviations from equipment or operating specifications of approved new sources, whether stated in NOC# 19NOC1344 or this Order of Approval, may constitute a violation of this condition and ORCAA regulations, unless prior approval is granted by ORCAA.

EU#	Emission Unit/Process	Control Measures
EU1	Air Filtration Company Spray Booth	-Stack: Emits at least 6 feet above the roofline -Fully Enclosed -Filters with an overall filter arrest efficiency of at least 99.43%.
IEU	Abrasive Blasting Booth (no associated conditions; included for completeness only)	-Vents indoors – does not emit to the atmosphere. Venting outdoors will require ORCAA pre-approval.

[Regulatory Basis: ORCAA 6.1.2(l)]

2. **Opacity Limit:** Visible emissions from all emission units shall not exceed 5% opacity as determined by 40 CFR Part 60 Appendix A Method 9 (EPA Method 9).

[Regulatory Basis: ORCAA 6.1.4(a)(2)]

3. **Facility-Wide Emissions Limits:** Facility-wide emissions shall be limited as listed below. For simplicity and ease of tracking emissions, it will be assumed emissions occur when purchased.

- a. Emissions of ethylbenzene (CAS 100-41-4) shall not exceed 1,180 pounds per year on a 12-month rolling sum basis. Compliance with this limit shall be determined by monitoring emissions according to Condition 4a.
- b. Except for ethylbenzene as described in Condition 3a, facility-wide emissions of each toxic air pollutant listed in WAC 173-460-150 shall not exceed its associated SQER. Compliance with these emission limits shall be determined by monitoring emissions according to Condition 4b.
- c. Emissions of materials containing isocyanates shall be limited as follows:
 - i. Emissions of hexamethylene diisocyanate (CAS 822-06-0) shall not exceed 0.092 pounds in a 24-hour period.
 - ii. Emissions of toluene diisocyanates (CAS 26471-62-5) shall not exceed 0.092 pounds in a 24-hour period.
 - iii. Emissions of methylene diphenyl isocyanate (MDI, CAS 101-68-8) shall not exceed 0.092 pounds in a 24-hour period.
- d. Emissions of VOCs shall not exceed 9.98 tons per year.

[Regulatory Basis: ORCAA 6.1.4(a)(5); WAC 173-460-070; ORCAA 6.1.2(l)]

4. **Annual Emission Limit Monitoring.** Compliance with the emission limits in Condition 3 shall be monitored as follows:

- a. Compliance with Condition 3a shall be monitored at least monthly by computing the actual amount of ethylbenzene emissions purchased over the previous 12-consecutive month period.
- b. Unless otherwise required by ORCAA, compliance with Condition 3b shall be monitored at least annually by computing the actual amount of TAP purchased over the previous calendar year and reporting per Condition 13.
 - i. For each TAP with a yearly averaging period, the amount purchased shall be assumed to be emitted over the course of the previous year.

- ii. For each TAP with a 24-hr averaging period, the amount purchased shall be conservatively assumed to be averaged over 250 operating days.
- iii. For each TAP with a 1-hr averaging period, the amount purchased shall be conservatively assumed to be averaged over 250 operating hours.

[Regulatory Basis: ORCAA 8.11]

5. **Emission Calculations.** All calculations of actual emissions shall be conducted using mass balance methods based on actual material used at the facility. The percentages or quantities of VOC, HAPs, and TAPs in materials used shall be based on the actual composition of the material from up-to-date Safety Data Sheets or other technical data available. Alternate emission calculation methods must be approved by ORCAA.

[Regulatory Basis: ORCAA 8.11]

6. **Isocyanate Monitoring Plan.** The permittee shall develop and submit to ORCAA for review an Isocyanate Monitoring Plan within 30 days of startup. The plan shall detail the methods the permittee will use to assure continuous compliance with the isocyanate limits in Condition 3c. The plan shall be revised, as needed, and resubmitted to ORCAA for review.

[Regulatory Basis: ORCAA 8.11]

7. **Material Restrictions.** The owner or operator is approved to apply metal coating materials (primer, lacquer, clear coat, paints, epoxies, etc.) intended for fabricated metal products. Application of other finishing materials may require prior approval by ORCAA through a NOC application in accordance with ORCAA Rule 6.1. Minor formula changes from materials listed in the associated NOC application and new materials are allowed without prior approval from ORCAA if the reformulated or new material meets the criteria in Condition 7a – 7c. Before use, the permittee shall review all reformulated or new materials and either document that the criteria in Condition 7a – 7c are met or receive pre-approval from ORCAA.

- a. The reformulated or new material will not affect the facility's ability to comply with any of the emission limits in Condition 3.
- b. Material usage of the reformulated or new material is tracked according to Condition 11b.

[Regulatory Basis: ORCAA 6.1.2(l)]

8. **Stack Specifications:** The exhaust stack of the spray booth shall have a vertical discharge to the atmosphere at least as high as specified in Condition 1. There shall be no flow obstructions at the point of discharge from the stack (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 6.1.4(a)(2); WAC 173-460-060]

9. **Filter Requirements:** The spray booth shall be equipped with properly seated exhaust filters that cover all openings of the exhaust plenum and have an overall filter arrest efficiency of at least 99.43%. Filters shall be monitored on a regular basis and shall be replaced whenever

damaged or loaded with particulate build-up to an extent that jeopardizes the effectiveness of the spray booth in capturing and controlling the emissions.

[Regulatory Basis: ORCAA 6.1.4(a)(2); ORCAA 6.1.4(a)(5); ORCAA Rule 8.8]

10. Operation and Maintenance: All reasonable measures and precautions shall be taken for minimizing emissions of volatile organic compounds and dust, including but not limited to:

- a. Conducting all spray coating operations within the approved spray booth.
- b. Operating the approved spray booth whenever conducting spray coating.
- c. Operating and maintaining the spray booth consistent with the manufacturer's recommendations.
- d. Keeping VOC-containing material in closed containers when not being used.
- e. Storing all solvents or solvent-containing cloth or other materials used for surface preparation in closed, airtight containers.
- f. Minimizing and promptly cleaning up all VOC material spills and leaks.
- g. Using low-VOC coatings and solvents when feasible.
- h. Using non-spray paint application techniques, or high transfer efficiency spray equipment, such as HVLP, reduced pressure, airless, air assisted airless, or similar equipment. Conventional spray equipment may only be used for applying low-VOC coatings and only when high transfer efficiency equipment is not feasible.
- i. Ensuring that all personnel that apply spray coatings are adequately trained in the selection, maintenance, and use of spray coating equipment.
- j. Performing regularly scheduled scans of visual emissions for all emission points.

[Regulatory Basis: ORCAA 6.1.4(a)(2); ORCAA 6.1.4(a)(5); ORCAA 8.8; WAC 173-400-040(4)(a)]

11. Recordkeeping: The following records shall be maintained for at least five years from the date the record originated, or as specified, and made available for inspection upon request:

- a. Safety data sheets (SDS) and composition data for all VOC-, HAP-, and TAP-containing materials used.
- b. Records of material usage for all VOC-containing materials used, and any other data used to calculate emissions. Records shall be sufficient to verify the actual amount of VOC-, HAP-, and TAP-containing materials used in terms of gallons per day, month and/or year, dependent on the compliance methods in Conditions 4 and 6. Material usage records for materials contained in hand-held spray cans or purchased in containers smaller than one gallon do not need to be included in the material usage unless they contain isocyanates.
- c. Records of annual emission monitoring as required by Condition 4.
- d. Records of all monitoring conducted under the Isocyanate Monitoring Plan as required by Condition 6.
- e. Records of all reformulated or new material determinations made under Condition 7.
- f. Records of all monitoring and filter changes conducted for all spray booths according to Condition 9.

[Regulatory Basis: ORCAA 8.11]

12. **Excess Emissions Reporting:** An exceedance of any of the emission limits in Condition 3 shall be reported to ORCAA no later than 30 days after the last day of the month in which the exceedance occurred.

[Regulatory Basis: ORCAA 8.11]

13. **Annual Inventory:** If requested by ORCAA, the owner or operator shall complete an annual emission inventory of all criteria, hazardous air pollutants, and toxic air pollutants emitted. The inventory shall be submitted to ORCAA within 30 days after receipt of the request.

[Regulatory Basis: ORCAA 8.11; ORCAA 4.3(c)]

Aaron Manley 5/1/2024

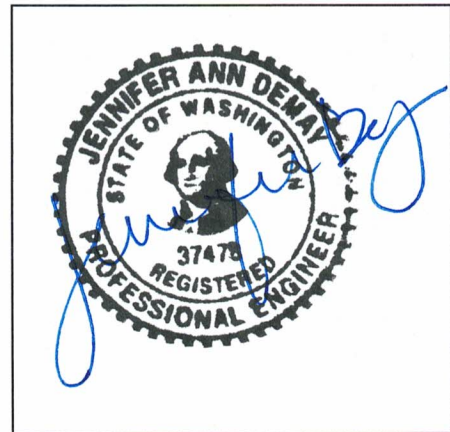
PREPARED BY: Aaron Manley, P.E.

Date

Jennifer DeMay 5/2/2024

REVIEWED BY: Jennifer DeMay, P.E.

Date





NOTICE OF CONSTRUCTION

AMENDMENT 1: 24ADM1637

AMENDMENT TO NOC# 19NOC1344, Issued June 25, 2019

Issued to:	E&L Coatings Northwest, LLC	County:	67 - Thurston
Location:	13313 Reeder Rd SW Tenino, WA 98589	Source:	801
Application #:	24ADM1637 (Amends NOC# 19NOC1344)	RC:	4
Prepared on:	April 25, 2024	File:	998

Administrative Amendment

This Administrative Amendment (Amendment 1) was initiated by Olympic Region Clean Air Agency (ORCAA) to correct emission limits in the Order of Approval for Notice of Construction (NOC) #19NOC1344 that contain typographical errors. E&L Coatings Northwest, LLC is an existing metal coating facility. Review through NOC# 19NOC1344 was for pre-approval of the metal spray coating operations.

NOC# 19NOC1344 includes conditions 3c(i, ii, and iii) requiring the facility to limit emissions of hexamethylene diisocyanate, toluene diisocyanate, and methylene diphenyl isocyanate to their respective small quantity emission rate (SQER) identified in WAC 173-460-150 at the time of permit issuance, June 25, 2019. The SQER at the time of permit issuance for all three toxic air pollutants (TAP) was 0.092 lb/24-hr period. During an inspection, ORCAA staff identified the NOC# 19NOC1344 Order of Approval erroneously had 0.0092 lb/24-hr, which was identified as a transpositional typo. The purpose of this administrative amendment is to rectify the typo.

The changes to conditions 3c(i, ii, and iii) are to replace the typos of "0.0092" with "0.092." There are no emissions increases nor changes to monitoring, recordkeeping, or reporting activities associated with the changes.

ATTACHMENTS

NOC# 19NOC1344 with Revision Markups

ORDER OF APPROVAL

NOTICE OF CONSTRUCTION #19NOC1344

Issued June 25, 2019

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[Regulatory Basis: ORCAA 8.11; ORCAA 4.3(c)]