

**ORDER OF APPROVAL**  
**NOTICE OF CONSTRUCTION 24NOC1662**  
ISSUED to Lacey Door and Millwork Inc. on  
**OCT 16 2024**

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This Order of Approval (“Order”) is issued in accordance with Olympic Region Clean Air Agency (“ORCAA”) Rule 6.1(a)(3) and Washington Administrative Code 173-400-114.

Conditional approval for installation and operation of a JBI spray booth located at 3960 12th Ave. S.E., in Lacey, WA 98503 (“Approved Location”), for operation solely as described in the associated Notice of Construction (“NOC”) application 24NOC1662, is hereby GRANTED to Lacey Door & Millwork, Inc. (“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 are 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current owners and operators of the equipment, and Applicant’s heirs, successors and assigns unless amended or superseded by a subsequent Order issued by ORCAA or unless the equipment is permanently shut down.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 are 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 is GRANTED, subject to the following Conditions of Approval:

1. **Approved Equipment:** The after-the-fact installation of a spray booth as described in Notice of Construction application No. 24NOC1662, the associated Final Determination and the following table is approved subject to conditions in this Order of Approval.
2. **Preapproval Required:** 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; or,
  - d. Deviations from the approved plans, drawings, data, and specifications of the stationary sources listed in Table 1.

- 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 Air Pollution Control Technology**

Control Technology	Specifications:
Spray Booth	Manufacturer: JBI Model: IDB-1695 Overall Arrest Efficiency: 99.6%

- [Regulatory Basis: ORCAA 6.1.2(l); WAC 173-400-114(1)]

3. **Stack Requirements:** The spray booth exhaust stack must have a vertical discharge to the atmosphere. 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 exhaust flow is acceptable.

[Regulatory Basis: ORCAA Rule 6.1.10(b)(3); WAC 173-400-114(2)(c)]

4. **Operation & Maintenance (O&M) Plan:** The following is required:

- a. Except for minor touch up work, all surface coating operations must be conducted in an approved spray booth that captures and exhausts all overspray through exhaust filters meeting the requirements of their respective order.
- b. The surface coating 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. Operating and maintaining the surface coating booth consistent with the manufacturer’s recommendations.
- d. Monitoring filters each day the surface coating booth is operated and replacing filters whenever damaged or loaded with particulate build-up to an extent that jeopardizes the effectiveness of the surface coating booth in capturing and controlling emissions.

[Regulatory Basis: ORCAA Rule 6.1.10(b)(2); WAC 173-400-114(2)(b); 40 CFR part 52.2470(c), Table 6]

5. **Process Equipment Visible Emissions Limit:** Visible emissions from the spray booth stack or any building opening must not exceed 5% opacity during any 6-minute average period in accordance with EPA Reference Method 9 of 40 CFR Part 60, Appendix A.

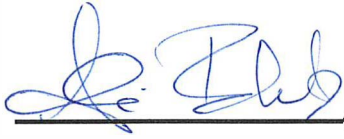
[Regulatory Basis: ORCAA 6.1.4(a)(2); 40 CFR part 52.2470(c), Table 6]

6. **Recordkeeping:** Copies of records must be maintained for a minimum period of five years from the date of origin and kept on-site and in a printed or electronic forms that readily accessible for inspection for at least the first two-years after the date the record is generated and may be kept off-site after that two-year period, provided the records can be made available to ORCAA within 15 days from being requested. At a minimum, records must include the following:

- a. Records sufficient to verify the average overspray arrestance (filtration) ratings of each exhaust filter material type. Published filter efficiency data provided by filter vendors or laboratories may be used to demonstrate compliance with this requirement.
- b. Records of daily filter checks for each day the spray booth operates.

c. Logs of filter changes.

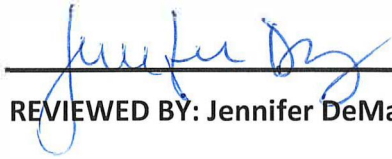
[Regulatory Basis: ORCAA Rule 6.1.10(b)(2); WAC 173-400-114(2)(b); 40 CFR part 52.2470(c), Table 6]



09/05/2024

PREPARED BY: Abi Roberts, Engineer I

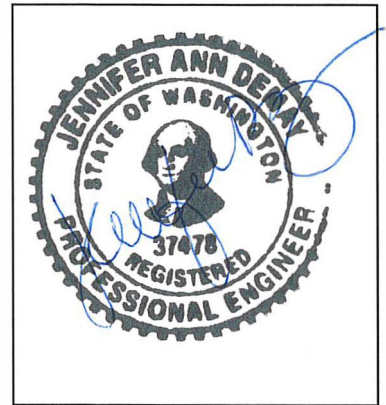
Date



9/5/2024

REVIEWED BY: Jennifer DeMay, PE

Date





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Mason, Pacific, and  
Thurston counties.*

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# FINAL DETERMINATION to APPROVE:

## Spray Booth Replacement

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## Lacey Door and Millwork

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## 24NOC1662

## September 5, 2024

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## NOTICE OF CONSTRUCTION FINAL DETERMINATION TO APPROVE

Olympic Region Clean Air Agency

<b>Issued to:</b>	<b>Lacey Door &amp; Millwork, Inc.</b>	<b>County:</b>	<b>67</b>
<b>Location:</b>	<b>3960 12th Ave. S.E. Lacey, WA 98503</b>	<b>Source:</b>	<b>716</b>
<b>Application #:</b>	<b>24NOC1662</b>	<b>RC:</b>	<b>3</b>
<b>Prepared on:</b>	<b>September 5, 2024</b>	<b>File:</b>	<b>795</b>

### 1. Summary

Lacey Door & Millwork, Inc. (Lacey Door) seeks approval from Olympic Region Clean Air Agency (ORCAA) for an after-the-fact installation of a spray booth at their door and millwork facility located at 3960 12th Ave. S.E., in Lacey, WA. Spray booths are regulated as air pollution control devices. Replacing a control device requires prior approval by ORCAA through a Notice of Construction (NOC) application. ORCAA staff reviewed Lacey Door’s proposal and concluded it may be conditionally approved. Recommended conditions of approval are detailed in Section 13 of this Final Determination report.

### 2. Regulatory Background

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. Projects involving replacement or substantial alteration of air pollution control technology that increase air pollution are considered either “New Sources” or “Modifications,” and are subject to New Source Review (NSR). All other projects involving replacement or substantial alteration of air pollution control technology are subject to ORCAA’s Rule 6.1.10 and WAC 173-400-114, which provide that ORCAA may:

1. Require the owner or operator employ “Reasonably Available Control Technology” RACT on the affected stationary source (on the emissions unit served by the subject control technology);
2. Prescribe reasonable operation and maintenance conditions for the control equipment; and,
3. Prescribe other requirements as authorized by chapter 70A.15 RCW.

Replacing or rebuilding the majority of critical parts of an air pollution control technology is not considered routine maintenance, repair or similar parts replacement.

Review and approval under ORCAA Rule 6.1(a)(3) is initiated by a project proponent submitting an NOC application<sup>1</sup>. The NOC application provides ORCAA information on the proposed project of sufficient detail to characterize air impacts, evaluate compliance with applicable air requirements and determine how to apply the provisions under ORCAA Rule 6.1.10 and WAC 173-400-114. NOC applications are posted on ORCAA’s website and may undergo a public notice and comment period if requested by the public.

In this case Lacey Door is proposing to replace the spray booth, which controls air emissions from the existing spray coating operation. Air pollutant emissions rates from the spray coating operation are expected to remain the same or be reduced as a result of this action. Also, ORCAA staff reviewed Lacey Door’s NOC application and determined the project does not qualify as routine maintenance, repair, or similar parts replacement. Therefore, review and approval of the project under ORCAA Rule 6.1.10 and WAC 173-400-114 is required.

### 3. Facility Background

Initially Nu-Door Inc., the facility has been in operation since before 1973. Nu-Door was issued a violation for failure to apply for a NOC for air pollution control equipment in 1973. The only NOC to be issued by ORCAA to date was for the installation of a duct system to control wood waste at the facility in 1974. Lacey Door & Millwork took over the operations in 1983 and registered with ORCAA in December of 1991. The existing spray booth predated ORCAA’s NSR effective date for spray coating operations (effective date of the Washington Air Toxics Regulations).

**Table 3.1: Permitting History with ORCAA**

Permit # (date)	Description	Status
NOC (11/5/74)	Unconditional approval for the installation of an air duct system to control fugitive dust emissions at the facility	Active

### 4. Facility Description

Lacey Door and Millwork produces custom doors and millwork and includes a prefinish operation for custom colors and stains. The main warehouse contains woodworking equipment and a wood waste collection system to collect and transport wood waste to a cyclone. The woodworking equipment includes CNC machine, belt sanders, molders, shaper, a panel saw, a table saw, chop saws, a router, a planar, a band saw, and rip saws. After cutting the pieces to

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<sup>1</sup> 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.



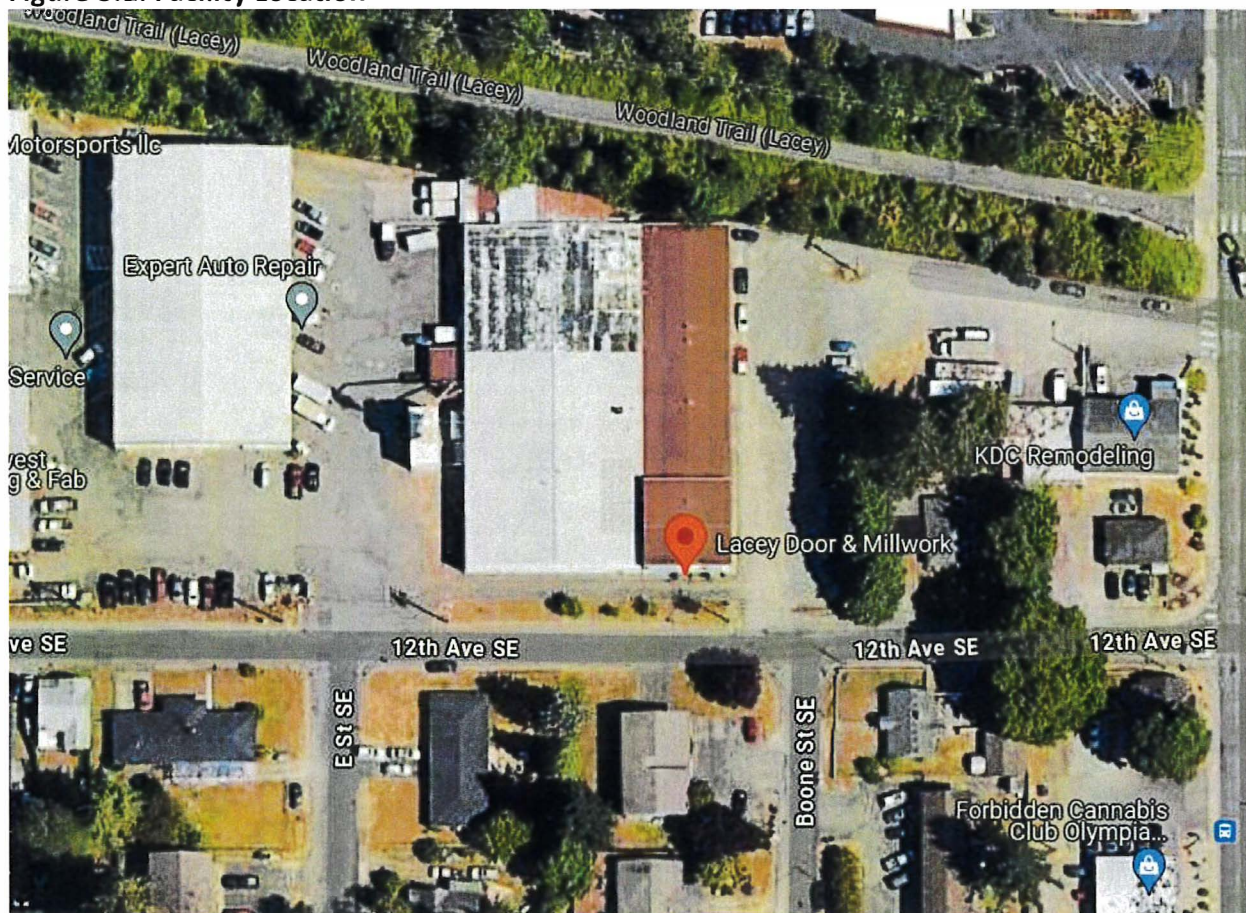
size, they are then coated and dried in a spray booth that collects the overspray from coating operations and vents it to the exhaust on the roof through the spray booth filters.

The 3-sided spray booth is located near the center of the facility with a preparation and mixing area just outside of the booth. The cyclone is on the west side of the facility.

**Table 3.2: Existing Emission Units**

Emission Unit	Air Pollution Control
Spray Coating Operation	Spray Booth Previously Binks Pass-thru spray booth 14'5" x 28'6" x 9'2" (W x L x H)
Woodworking operations	Everett Metal Products Cone Cyclone and Hopper.

**Figure 3.1: Facility Location**



\* Imagery ©2024 Airbus, CNES/Airbus, Maxar Technologies, Map data ©2024 Google  
 \*\* Annotated by ORCAA

**Figure 3.2: Picture of Facility**



\* Photo from ORCAA Inspection on May 19, 2014

## 5. Project Description

Lacey Door replaced the Binks spray booth sometime between 1992 and 2016 with a JBI spray booth. The time frame for replacement was determined based on the spray booth model listed in the inspection reports from those years. Doors and millwork pieces are placed inside a spray booth and sprayed via spray guns. The overspray is collected and exhausted to an exhaust vent on the roof through filters with an overall effective rating of 99.6%.

**Table 5.1: Air Pollution Control Technology Specifications**

Air Pollution Control Technology	Specifications
Spray Booth	Manufacturer: JBI Model: IDB-1695 Closed top open front spray booth with ceiling exhaust Media Type: Master Air Brush, Fiberglass Pad, 20x20 Overall Arrest Efficiency: 99.6% Filtered Area: 146 ft <sup>2</sup> Exhaust Air Flow Rate at 0.65" w.g.(acfm): 16,500 cfm Fan Diameter: 3 ft

## 6. Emissions Evaluation

Lacey Door has stated that there were no changes to spray coating operations.

## 7. Administrative Requirements for NOC Applications

All 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 Lacey Door's 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 Lacey Door's NOC application was posted on ORCAA's website on July 2, 2024, at 11:00 am. The time period for filing comments on the application and requests for a public comment period expired on July 17, 2024, at 4:30 pm. ORCAA did not receive any comments for the project.

## 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.

The spray booth replaces a previous spray booth. As there is no material expansion or change in use beyond that previously existing, the project qualifies for a SEPA exemption under WAC 197-11-800(3).

## 9. Criteria for Approval

For projects triggering review and approval solely as replacements or substantial alterations of air pollution control technology, RCW 70A.15.2220 provides ORCAA authority to:

- a) Require the owner or operator employ "Reasonably Available Control Technology" (RACT) on the affected stationary source (on the emissions unit served by the subject control technology); and,
- b) Prescribe reasonable operation and maintenance conditions for the control equipment.
- c) Prescribe other requirements as authorized by Chapter 70A.15 RCW.

These provisions are administered under ORCAA's Rule 6.1.10 and WAC 173-400-114. The following sections provide more detail on each of the above three stated provisions.

### ***Reasonably Available Control Technology (RACT):***

RACT is defined in ORCAA's Rule 1.4 as:

*The lowest emission limit that a particular stationary source or stationary source category is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility. RACT is*

*determined on a case-by-case basis for an individual stationary source or stationary source category taking into account the impact of the stationary source upon air quality, the availability of additional controls, the emission reduction to be achieved by additional controls, the impact of additional controls on air quality, and the capital and operating costs of the additional controls. RACT requirements for any stationary source or stationary source category shall be adopted only after notice and opportunity for comment are afforded.*

ORCAA staff's conclusion is that the after-the-fact installation of a spray booth with an overall arrest efficiency of 99.6% proposed by Lacey Door meets RACT for this case.

***Reasonable Operation and Maintenance Conditions:***

All reasonable measures and precautions shall be taken for minimizing volatile emissions and overspray including but not limited to:

- a) Conducting spray coating operations only in the approved spray booth;
- b) Operating and maintaining the spray booth consistent with the manufacturer's recommendations; and
- c) Operating the approved spray booth whenever conducting spray coating.

***Requirements as Authorized by Chapter 70A.15 RCW:***

Requirements "*authorized by chapter 70A.15 RCW*" refers to performance standards that apply to specific categories of equipment such as boilers, engines incinerators, etc. RCW 70A.15.3050 requires every activated authority operating an air pollution control program to promulgate or adopt requirements for the control of emissions from stationary sources, which are no less stringent than those adopted by the Washington Department of Ecology (Ecology), for the geographic area in which such air pollution control program is located. Requirements less stringent than Ecology's requirements may be adopted only if approved by Ecology, and only after a public process. More stringent control requirements are allowed without Ecology's approval. ORCAA's program is comprised of ORCAA-specific, State and federal performance standards, which are at least as stringent the standards adopted by Ecology.

ORCAA staff surveyed all relevant performance standards that may apply to either the subject spray booth or the spray coating operation it serves. For each relevant standard, applicability was evaluated and is summarized in the following tables. The performance standards in Table 9.1 were determined applicable to either the subject spray booth or the spray coating operation it serves. The performance standards in Table 9.2 were determined relevant, but inapplicable.

**Table 9.1: Applicable Performance Standards specific for the subject spray coating operation and spray booth**

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	Applies to
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.
General Standards for Maximum Visual 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.	Spray booth stack emissions
Particulate Standards for Process Units WAC 173-400-060 & ORCAA Rule 8.3(a)	No person shall cause or allow the emission of particulate material from any general process operation in excess of 0.23 grams per dry cubic meter at standard conditions (0.1 grain/dscf) of exhaust gas.	Applies to generally to all stationary process units that exhaust to the atmosphere.
Control Equipment Maintenance & 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.	All air pollution control technology
Fallout Prohibition 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.	All direct and fugitive emissions
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 shall take reasonable precautions to prevent the release of air contaminants from the operation.	Applies generally to any activity that results in fugitive emissions.
Odor Control and Prohibitions 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.	All direct and fugitive emissions
Emissions Detrimental to Persons or Property WAC 173-400-040(6) & ORCAA Rule 7.6	Prohibits emissions of any air contaminant from any source that are detrimental to persons or property.	All direct and fugitive emissions.
Concealment and Masking WAC 173-400-040(8) & ORCAA Rule 7.5	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

Note: This table provides applicability determinations with respect to the subject spray coating operation and spray booth only.

**Table 9.2: Performance Standards Determined Inapplicable for the subject spray coating operation and spray booth**

Regulation Title Citation	Relevant Performance Standard Determined Inapplicable	Basis
MACT: National Emissions Standards for Wood Furniture Manufacturing Operations 40 CFR Part 63, Subpart JJ	Implementing the FCAA, this standard establishes operational standards and recordkeeping requirements for facilities engaged in wood furniture manufacturing operations at major sources of HAP.	Lacey Door is not a major source of HAP.
MACT: Plywood and Composite Wood Products Manufacturers 40 CFR Part 63, Subpart DDDD	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 at major sources of HAP.	Lacey Door is not a major source of HAP.
MACT: National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products 40 CFR Part 63, Subpart QQQQ	Implementing the FCAA, this standard establishes national compliance options, operating requirements, and work practices requirements for HAP emitted from surface coating of wood building products at major sources of HAP.	Lacey Door is not a major source of HAP.
MACT: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources 40 CFR Part 63, Subpart HHHHHH	National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources	Lacey Door does not spray-apply materials containing any of the listed ‘target HAP’ per 40 CFR 63.11180 (Chromium, Lead, Manganese, Nickel, or Cadmium), nor do they perform spray application of coatings to motor vehicles or mobile equipment, nor do they use Methylene Chloride for paint stripping activities at the Facility. Therefore, Lacey Door does not meet any applicability requirements per 40 CFR 63.11170(a).

Note: This table provides applicability determinations with respect to the subject spray coating operation and spray booth only.

## 10. 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 may be subject to permitting requirements under WAC 173-400-700 through 173-400-860.

Lacey Door is not a “Major Stationary Source” under the permitting program required by WAC 173-400-700 through WAC 173-400-860. Therefore, these permitting requirements do not apply.

## 11. 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.

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

## 12. Environmental Justice Considerations

EPA defines Environmental Justice (EJ) as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. The purpose of an EJ review in conjunction with an air permitting action is to ensure no group of people bear a disproportionate share of the negative environmental consequences as the result of the permitting action. Further, ORCAA strives to engage the affected community effectively and meaningfully regarding the permitting action, and to ensure compliance with obligations pursuant to Title VI of the Civil Rights Act. With respect to factoring EJ into air permitting decisions, EPA Region 10 expects air agencies to:

- Identify overburdened communities;
- Engage with communities;
- Evaluate cumulative impacts; and,
- Use available authority to minimize emissions.

However, EPA Region 10 does not expect air agencies to use the Clean Air Act’s authorities to address existing disproportional impacts to communities when implementing New Source Review in areas that are “attainment/unclassifiable” with respect to meeting the NAAQS.

The following subsections describe how these expectations from EPA Region 10 were met.

### 12.1 Identify Overburdened Communities

The initial step in an EJ review is to identify any affected populations or communities of concern and to identify whether they are disproportionately impacted. ORCAA used EPA’s environmental justice screening and mapping tool, EJScreen, to answer this first part of this question. An EJScreen Community Report was generated for Thurston County. The Community Report estimates a minority population of 27%, with approximately 4% of the total population speaking Spanish and 8% speaking another Non-English language at home. All demographic

indicators were below the 80th percentile for the nation. Likewise, the Community Report indicates that Thurston County is below the 80th percentile for all environmental indicators. Environmental indicators above the 80th percentile are an indication that a community is already disproportionately impacted. Therefore, ORCAA staff's conclusion is that the project impact area does not include any preexisting, overburdened communities. A copy of the Community Report with more detailed information will be filed as part of the supporting documentation for the project.

Preexisting air quality impacts were evaluated based on ambient air quality monitoring data and designation of the area with respect to maintaining compliance with the NAAQS. If air quality in a geographic area meets or is cleaner than a national standard based on ambient air monitoring data, it is called an attainment area and designated "attainment/unclassifiable." Areas may also be presumed "attainment/unclassifiable" based on population density and air pollutant emissions being below certain thresholds. For this case, the project impact area and Thurston County as a whole is designated "attainment/unclassifiable." Therefore, there are no preexisting nonattainment issues identified within the County. The project's criteria emissions will not cause or contribute to a violation of an AAQS. Therefore, ORCAA staff's conclusion is that there are no indications of any existing disproportional impacts to communities of concern within the project impact area.

## ***12.2 Engage with Communities***

Based on the size and scope of the project, and that there are no overburdened communities near the project, ORCAA staff determined the public noticing procedures outlined in Section 7 above are sufficient notifications.

## ***12.3 Evaluate Cumulative Impacts***

The air permitting action for this case did not trigger a cumulative impacts analysis under either the Clean Air Act or the Washington Clean Air Act as it was a spray booth replacement and did not change the scope of activities at the facility.

## ***12.4 Use Available Authority to Minimize Emissions***

As described elsewhere in this report, ORCAA applied existing New Source Review authorities provided under the Clean Air Act and the Washington Clean Air Act to minimize emissions from the after-the-fact installation of a spray booth project. Principally among these authorities is the requirement to use RACT for controlling emissions. The RACT requirement was applied and corresponding RACT emissions limits are included in the air permit.

## **13. 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 with once the Approval Order is issued:



1. **Approved Equipment:** The after-the-fact installation of a spray booth as described in Notice of Construction application No. 24NOC1662, the associated Final Determination and the following table is approved subject to conditions in this Order of Approval.
2. **Preapproval Required:** 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; or,
  - d. Deviations from the approved plans, drawings, data, and specifications of the stationary sources listed in Table 13.1.
  - 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 13.1: Approved Air Pollution Control Technology**

Control Technology	Specifications:
Spray Booth	Manufacturer: JBI Model: IDB-1695 Overall Arrest Efficiency: 99.6%

[Regulatory Basis: ORCAA 6.1.2(l); WAC 173-400-114(1)]

3. **Stack Requirements:** The spray booth exhaust stack must have a vertical discharge to the atmosphere. 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 exhaust flow is acceptable.

[Regulatory Basis: ORCAA Rule 6.1.10(b)(3); WAC 173-400-114(2)(c)]

4. **Operation & Maintenance (O&M) Plan:** The following is required:
  - a. Except for minor touch up work, all surface coating operations must be conducted in an approved spray booth that captures and exhausts all overspray through exhaust filters meeting the requirements of their respective order.
  - b. The surface coating 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. Operating and maintaining the surface coating booth consistent with the manufacturer's recommendations.
  - d. Monitoring filters each day the surface coating booth is operated and replacing filters whenever damaged or loaded with particulate build-up to an extent that jeopardizes the effectiveness of the surface coating booth in capturing and controlling emissions.

[Regulatory Basis: ORCAA Rule 6.1.10(b)(2); WAC 173-400-114(2)(b); 40 CFR part 52.2470(c), Table 6]

5. **Process Equipment Visible Emissions Limit:** Visible emissions from the spray booth stack or any building opening must not exceed 5% opacity during any 6-minute average period in accordance with EPA Reference Method 9 of 40 CFR Part 60, Appendix A.  
[Regulatory Basis: ORCAA 6.1.4(a)(2); 40 CFR part 52.2470(c), Table 6]

6. **Recordkeeping:** Copies of records must be maintained for a minimum period of five years from the date of origin and kept on-site and in a printed or electronic forms that readily accessible for inspection for at least the first two-years after the date the record is generated and may be kept off-site after that two-year period, provided the records can be made available to ORCAA within 15 days from being requested. At a minimum, records must include the following:

- a. Records sufficient to verify the average overspray arrestance (filtration) ratings of each exhaust filter material type. Published filter efficiency data provided by filter vendors or laboratories may be used to demonstrate compliance with this requirement.
- b. Records of daily filter checks for each day the spray booth operates.
- c. Logs of filter changes.

[Regulatory Basis: ORCAA Rule 6.1.10(b)(2); WAC 173-400-114(2)(b); 40 CFR part 52.2470(c), Table 6]

## 14. Final Determination to Approve

This Final Determination report documents ORCAA staff's determinations with respect to the applicable criteria of approval in ORCAA Rule 6.1.10 and WAC 173-400-114. ORCAA staff recommends approval of Lacey Door's proposed after-the-fact installation of a spray booth, provided the conditions identified in Section 13 of this Final Determination are implemented through an enforceable Order of Approval (AKA: Air Permit). Information supporting this Final Determination is attached and includes:

~ end of section ~

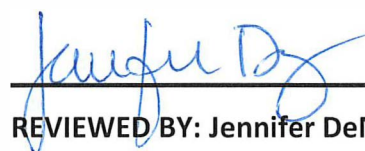


09/05/2024

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PREPARED BY: Abi Roberts, Engineer I

Date



9/5/2024

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REVIEWED BY: Jennifer DeMay, PE

Date

## Attachments

Applicable Performance Standards that apply to Lacey Door & Millwork, Inc.

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.	Lacey Door 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.	Lacey Door is required to register and pay 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.	Applies generally to all air pollution sources
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.	Applies generally to all air pollution sources
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.	Applies generally to all air pollution sources
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	<del>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.</del>	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 shall be available on the premises designated on the order or certificate. In the event that the Agency requires order or registration certificate to be displayed, it	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
	shall be posted. No person shall 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 shall 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 becoming airborne and must maintain and operate the source to minimize emissions.	Applies to any activity that results in fugitive dust.

## Attachments

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	Applies to
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.
Particulate Standards for Process units ORCAA Rule 8.3(a) WAC 173-400-060	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.	Applies to generally to all stationary process units that exhaust to the atmosphere.

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.

Form fields including Business Name (Lacey Door & Millwork, Inc.), Mailing Address (3960 12th Ave. S.E. Lacey WA 98503), Project description (Prefinish Booth - Installed 2003), and owner information (Dale Roberts, President).

For ORCAA use only
File No: 795
County No: 07
Source No: 710
Application No: 24NOC1662
Date Received: JUN 14 2024
ORCAA

Agency Use Only
CONDITIONALLY APPROVED FOR CONSTRUCTION ONLY IN ACCORDANCE WITH RCW 70A.15 AND WAC 173-400 ORCAA REGULATIONS
(SEE ATTACHED ATTENDUM FOR CONDITIONS OF APPROVAL)
10/16/2024
DATE
ORCAA
Revised 2/11/2020