



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

(360) 539-7610
Or 1-800-422-5623
Fax: (360) 491-6308

www.ORCAA.org

Executive Director
Jeff C. Johnston

*Serving Clallam,
Grays Harbor, Jefferson,
Mason, Pacific, and
Thurston counties.*

NEW SOURCE PRELIMINARY DETERMINATION to APPROVE:

New and Modified Lumber
Coating Operations and a
Request for Voluntary Limit
(Synthetic Minor)

Alta Forest Products

23NOC1587

November 27, 2023

Table of Contents

1. Summary	1
2. Regulatory Background	1
3. Facility Background	3
4. Facility Description	3
5. Project Description	6
6. Emission Increases	9
7. Administrative Requirements for NOC Applications	10
8. SEPA Review	10
9. Criteria for Approval	11
10. Applicable Performance Standards (Summary)	11
11. Best Available Control Technology (BACT).....	14
12. Ambient Impact Analysis (Criteria Pollutants)	15
13. Ambient Impact Analysis (Toxic Air Pollutants).....	15
14. Requirements for Major Stationary Sources and Major Modifications to Major Stationary Sources	19
15. Title V Air Operating Permit (AOP) Implications.....	19
16. Environmental Justice Considerations	19
17. Conditions of Approval	21
17. Preliminary Determination to Approve.....	26



NOTICE OF CONSTRUCTION PRELIMINARY DETERMINATION TO APPROVE

Olympic Region Clean Air Agency

Issued to:	Alta Forest Products	County:	45- Mason
Location:	780 W ST Rt 108 Shelton, WA 98584	Source:	803
Application #:	23NOC1587	RC:	RC1
Prepared on:	November 27, 2023	File:	556

1. Summary

Alta Forest Products (Alta) seeks approval from Olympic Region Clean Air Agency (ORCAA) to install three lumber coating lines and use reformulated coating materials in all coating lines (new and existing), at their facility located at 780 W ST Rt 108, Shelton, Washington. The actions qualify as new stationary sources of air emissions and modifications of existing emissions units, which triggers ORCAA's review through a Notice of Construction (NOC) permit. Alta is also requesting a voluntary limit of 99 tons per year on volatile organic compounds (VOCs). ORCAA's Preliminary Determination is that the proposal described above be approved as it meets all the criteria for approval. The proposed conditions of approval are detailed in Section 17 of this Preliminary Determination report.

2. Regulatory Background

Pursuant to the Washington Clean Air Act under chapter 70A.15 of the Revised Code of Washington, ORCAA's Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6¹ require New Source Review (NSR) for new stationary sources of air pollution (referred to as new sources) in ORCAA's jurisdiction. NSR is also required prior to installing, replacing, or substantially altering any air pollution control technology. NSR generally refers to the process of evaluating air quality impacts and the likelihood of compliance with applicable air regulations and standards. NSR and approval of an air permit by ORCAA is required prior to commencing construction or modification of any new source or prior to installing, replacing, or substantially altering air pollution control technology. The goal of NSR is

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

to assure compliance with applicable air regulations and standards, including equipment performance standards and ambient air quality standards.

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

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

In this case, Alta is proposing to install three lumber coating lines controlled by booths and to use reformulated coating materials in all coating lines (new and existing) at their facility located in Shelton, Washington. These actions independently trigger ORCAA's review through a Notice of Construction (NOC) permit.

In addition, under ORCAA Rule 6.1.12 and WAC 173-400-091, the owner or operator of a source can request a voluntary limit on emissions of any air contaminant or contaminants. Voluntary limits are typically requested to limit emissions below a level that would trigger additional

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

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

requirements, such as requesting a limit to establish a source as a minor source with respect to the Air Operating Permit or Prevention of Significant Deterioration programs. In this case, Alta is requesting a voluntary limit to establish the facility as a minor source with respect to the Air Operating Permit program.

Voluntary limits on emissions are issued under ORCAA Rule 6.1.12 which requires:

- (a) ORCAA to issue a regulatory order that limits the source’s potential to emit any air contaminant or contaminants to a level agreed to by the owner or operator and the Agency.
- (b) The limit must be less than the source’s otherwise allowable annual emissions of a particular contaminant under all applicable requirements of the chapter 70.94 RCW and the FCAA, including Washington State Implementation Plan.
- (c) The order shall include monitoring, record keeping and reporting requirements sufficient to ensure that the source complies with any condition established under this rule. Monitoring requirements shall use terms, test methods, units, averaging periods, and other statistical conventions consistent with the requirements of WAC 173-400-105.
- (d) The order shall be subject to the notice and comment procedures under Rule 6.1.3 including a formal 30-day public comment period.
- (e) The terms and conditions of the regulatory order are federally enforceable. Any proposed deviation from a condition contained in an order issued under this rule shall require revision or revocation of the order.

3. Facility Background

Alta Forest Products is a wood products facility founded in 1975. Alta was originally permitted as Skookum Lumber in 1988. Skookum Lumber subsequently changed their name to Welco Lumber in 2000, and in 2014 became Alta.

Table 3.1. Permitting History with ORCAA

Permit # (date)	Description	Status
18NOC1302 (8/6/2019)	Alta submitted a permit application to permit an oil stain and spray coating operation and associated equipment.	Will be superseded by this Order of Approval
14NOC1040 (cancelled)	During an inspection May 1, 2014 ORCAA staff identified an unpermitted coating booth. Alta applied for an after-the-fact permit for the unpermitted coating operation. During the review Mason County deemed the building not suitable and it was torn down. The project was cancelled.	Cancelled
12NOC917 (8/13/2012)	Alta submitted an application to install a cyclone and saw for a new dog-eared line. Alta cancelled the project before it could be completed.	Cancelled
89NOC415 (4/17/1989)	ORCAA approved installation of wood fired boiler and associated air pollution control equipment. Alta has since removed the boiler.	Equipment removed
88NOC399 (4/26/1988)	ORCAA approved installation of 400 hp boiler firing #2 diesel oil. Alta has since removed the boiler.	Equipment removed

4. Facility Description

Alta is a wood products facility located about a mile west of Highway 101 and about 5.5 miles south of Shelton, Washington. Alta is situated in a commercial facility, and adjacent property includes forest land, agricultural activities, and rural residential housing.

Table 4.1a. Existing Emission Units

Equipment	EU#	Manufacturer	Specifications
Flow Coater	EU1	Fabricated by Alta	<ul style="list-style-type: none"> ▪ Fully enclosed ▪ Continuous liquid flow application method ▪ Maximum application rate of 10 gallons/hr ▪ Manually fed ▪ Originally permitted to apply oil-based coatings
Spray Box	EU2	Fabricated by Alta	<ul style="list-style-type: none"> ▪ May be used for the spray-application of paints ▪ Fully enclosed ▪ Mist elimination system containing a scrubber ▪ Automated line ▪ Originally permitted to apply water-based coatings
Cyclone #1	EU3	Hammermill	<ul style="list-style-type: none"> ▪ 7' Diameter ▪ Feeds to chip truck bin ▪ Exhausts to atmosphere
Cyclone #3		Unknown	<ul style="list-style-type: none"> ▪ 9' Diameter ▪ Feeds to Cyclone #4 ▪ Exhausts to atmosphere
Cyclone #4		Unknown	<ul style="list-style-type: none"> ▪ 48" Diameter ▪ Next to and above Cyclone #3 ▪ Feeds to chip truck bin ▪ Exhausts to atmosphere
Cyclone #9		Unknown	<ul style="list-style-type: none"> ▪ Captures metal grindings from saw shop and empties into a small drum ▪ Exhausts to atmosphere
Cyclone #10		Donaldson	<ul style="list-style-type: none"> ▪ Drops fines into an open top dumpster ▪ Captures fines from the dog ear machine ▪ Exhausts to atmosphere
Chipper	EU4	Unknown	<ul style="list-style-type: none"> ▪ 60"
Chipper		Unknown	<ul style="list-style-type: none"> ▪ 48"
Debarker		Unknown	<ul style="list-style-type: none"> ▪ Enclosed in metal "housing"
Truck Bin	EU5	Unknown	<ul style="list-style-type: none"> ▪ Used for bark storage ▪ About 2 truckloads per day
Truck Bin		Unknown	<ul style="list-style-type: none"> ▪ Used for sawdust ▪ About 2 truckloads per day
Truck Bin		Unknown	<ul style="list-style-type: none"> ▪ Double chip bin ▪ About 2 truckloads per day
Log Yard	EU6	N/A	<ul style="list-style-type: none"> ▪ N/A
Haul Roads	EU7	N/A	<ul style="list-style-type: none"> ▪ N/A

The equipment identified in Table 4.1b are located at the facility and were determined to be categorically exempt from the requirement to file a NOC.

Table 4.1b. Existing Insignificant Emission Units

Equipment	Specifications
Gasoline Storage Tank	<ul style="list-style-type: none"> ▪ 500 gallons storage capacity or less ▪ SN 7873
Diesel Storage Tank	<ul style="list-style-type: none"> ▪ Unknown storage capacity
Evaporator	<ul style="list-style-type: none"> ▪ Samsco “RunDry” Evaporator ▪ Rated 15kW electric power ▪ 7 Gallon capacity ▪ Evaporates wash water
Used Oil Burner	<ul style="list-style-type: none"> ▪ Model EL-350H ▪ Rated 0.28 MMBtu/hr
Emergency Diesel Engine	<ul style="list-style-type: none"> ▪ Clarke Detroit Diesel-Allison, Inc. ▪ Model PDFP-L6YT 2504 ▪ Rated up to 110 BHP at 1760 RPM

Figure 4.1: Facility Location



* Imagery ©2023 CNES/ Airbus, Maxar Technologies, U.S. Geological Survey, USDA/FPAC/GEO, Map date ©2023

Figure 4.2: Site Map of Coating Emission Units



-Image supplied by applicant as part of permit application addendum dated 10-4-2023

Table 4.2. Potential to Emit (Existing facility)

Pollutant	Classification (Criteria ^a /HAP ^b /TAP ^c)	Annual Emissions	Units
PM (Total Particulate)	N/A	65.0	Tons
PM ₁₀ (Total Particulate) (<= 10)	Criteria	23.9	Tons
PM _{2.5} (Fine Particulate (<=2.5))	Criteria	17.8	Tons
VOC ^d (Volatile Organic Compounds as VOC)	N/A	54.4	Tons
Hazardous Air Pollutants (Total HAP)	HAP	1.1	Tons
Toxic Air Pollutants (Total TAP)	TAP	2,260	Lbs
Ethylbenzene	TAP	2,260	Lbs
Naphthalene	TAP	0.129	Lbs

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

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

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

^d VOC is regulated as a Criteria Air Pollutant because it is a precursor to Ground Level Ozone (O₃)

5. Project Description

Alta’s project is three-fold. The first is the proposed addition of new coating equipment (EU8, EU9, and EU10). The second is the proposal to use reformulated coating materials for all

coating equipment (new and existing). The addition of the coating equipment and reformulated coatings increases Alta's potential to emit for VOCs above the 100 ton per year threshold that would classify Alta as a 'major sources' under the Title V program. Alta is therefore requesting a voluntary limit of 99 tons per year for VOCs as allowed by ORCAA Rule 6.1.12 and WAC 173-400-091. Requesting a voluntary limit is a regulatory option for facilities that could otherwise emit at 'major source' levels. By taking a voluntary limit, the facility artificially limits its potential to emit and stays out of the Title V program, which has additional monitoring, recordkeeping, and reporting requirements.

Alta plans to install an enclosed manually-fed flood coater (EU8) to coat fencing boards with oil-based stain. The boards will be preheated by three low NOx propane-fired heaters each rated at 1.5 million BTU/hr. The boards are heated to reduce the moisture content on the outer surface of the wood which is necessary for the stain to properly adhere. As boards enter the flood coater, stain pours over the board. Once coated in stain, the boards pass through rollers to remove excess stain and then exit the flood coater. The stain is recovered and recycled back through the system. The flood coater is not pressurized nor does it vent or exhaust through a stack. Emissions exhaust through openings at the entrance and exit of the flood coater into the coating building. The coating building vents to the atmosphere through three (3) 1,950 CFM exhaust fans. Associated emissions are volatile and nonparticulate in nature. After coating, the boards are stored to cure at room temperature with no additional treatments or heating.

During recent inspections ORCAA staff identified a spray box coater ("Transverse" aka "Coater 1"; EU9) and a spray coater ("Coater 2"; EU10) that should have received approval from ORCAA through a Notice of Construction prior to installation. When ORCAA notified Alta of this oversight, Alta submitted after-the-fact permitting forms as part of this permitting action. Both units exhaust through vertical stacks.

The Transverse aka Coater 1 (EU9) is an enclosed staining box fabricated by Spray Co. Wood fence boards move through the unit in a transverse direction. No heated drying occurs prior to staining the boards. As boards enter the staining box, they move through a spray ring where fungicide is atomized and sprayed over the boards and excess product is squeegeed off all four sides within the box. Once sprayed, the boards exit the box, and are air dried, stacked, strapped, and prepared for shipment. Excess liquid from the application process is collected within the spray box, then passes through a vibro screen to shake off debris before collecting in a tank. Once the tank is full, the stain is routed through a sock filter and returned to the spray ring stain applicator for reuse. The sock filter is replaced periodically as debris collects in the filter. A vent stack offset from the spray box extends 8 feet above the building height allowing emissions from the spray box to exhaust from the building. The vent stack includes a scrubber/demister consisting of baffles to remove condensate before venting to the atmosphere.

Coater 2 (EU10) is an enclosed spray box fabricated by Spray Co. Wood fence boards move through the unit in a longitudinal direction. No heated drying occurs prior to staining the boards. As the boards enter the staining box, they move through a spray ring where stain add/or fungicide is atomized and sprayed over the boards and excess is rolled off all four sides within the box. Once sprayed, the boards exit the box, and are air dried, stacked, strapped, and

prepared for shipment. Excess liquid from the application process is collected within the spray box, then passes through a vibro screen to shake off debris before collecting in a tank. Once the tank is full, the stain is routed through a sock filter and returned to the spray ring stain applicator for reuse. The sock filter is replaced periodically as debris collects in the filter. A vent stack offset from the spray box extends 8 feet above the building height allowing emissions from the spray box to exhaust from the building. The vent stack includes a scrubber/demister consisting of baffles to remove condensate before venting to the atmosphere.

In addition, during review of Alta’s 2022 Emission Inventory submittal, ORCAA noted that Alta was using new coatings in the existing coating lines. The coating usage and emissions were greater than that reviewed during NOC# 18NOC1302 and two of the materials contained a new TAP. ORCAA asked Alta to address this as part of this permitting action. While preparing the application addendum, Alta reviewed the coating materials they’ve historically applied at the facility and proposed new low-VOC materials to meet BACT for both new and existing coating units.

Alta proposes to run water-based colorants and Mycostat® IV (an anti-fungal) on Coater 2 (EU10) and EU2. Alta also proposes to use Transverse (EU9) for application of Mycostat® IV only. These three EUs are located in the Mill building. Water-based coatings may be applied via spray application or flood coating.

Alta proposes to apply oil-based colorants on EU1 and EU8, which are located in the Dry Storage building. Oil-based colorants are only applied using flood or flow coating application methods (no spray coating).

Table 5.1: New and Modified Emissions Units

Emission Unit	Description
EU1- Flow Coater (existing; modified)	<ul style="list-style-type: none"> ▪ Fully enclosed ▪ Continuous liquid flow application method ▪ Maximum application rate of 10 gallons/hr ▪ Manually fed ▪ Originally permitted to apply oil-based coatings ▪ Applies oil-based colorants
EU2- Spray Box (existing; modified)	<ul style="list-style-type: none"> ▪ May be used for the spray-application of paints ▪ Fully enclosed ▪ Mist elimination system containing a scrubber ▪ Automated line ▪ Originally permitted to apply water-based coatings ▪ Applies water-based colorants and Mycostat® IV
EU8- Stain Coating Line controlled by a Flood Coating Booth (new)	<ul style="list-style-type: none"> ▪ 136” L x 29 ½” W x 27 ¼” H ▪ Manufactured by Wood Defender ▪ Fully enclosed ▪ Continuous liquid flow application method ▪ Manually fed ▪ Three low NOx propane-fired heaters each rated at 1.5 million BTU/hr ▪ Applies oil-based colorants
EU9- Spray Box Coater “Transverse” aka “Coater 1” (new)	<ul style="list-style-type: none"> ▪ Manufactured by Spray Co ▪ Automated ▪ Fully Enclosed

	<ul style="list-style-type: none"> ▪ Mist elimination system containing a scrubber ▪ Exhausts through stack at 26'-10" ▪ 10" Stack Inside Diameter ▪ Applies Mycostat® IV
EU10- Spray Coater "Coater 2" (new)	<ul style="list-style-type: none"> ▪ Manufactured by Spray Co ▪ Automated ▪ Fully Enclosed ▪ Mist elimination system containing a scrubber ▪ Exhausts through stack at 26'-10" ▪ 8" Stack Inside Diameter ▪ Applies water-based colorants and Mycostat® IV

6. Emission Increases

Alta provided Safety Data Sheets (SDS) for the proposed coating materials and completed emission calculations, which ORCAA staff verified. ORCAA is including an enforceable facility-wide VOC limit in the Order of Approval.

Table 6.1. Project Emissions

Pollutant	Classification (Criteria ^a /HAP ^b /TAP ^c)	Emission Rate (lb/yr)	Emission Rate (lb/day)	Emission Rate (lb/hr)
VOC ^d (Volatile Organic Compounds as VOC)	N/A	198,000	2,556	107
TAP	TAP	22,497	62	2.6
HAP	HAP	470	1.28	0.053
1,2,4-Trimethylbenzene	TAP	3,259	8.9	0.37
1,3,5-Trimethylbenzene	TAP	1,588	4.3	0.18
Boron & Compounds, NOS	TAP	17,180	47	2.0
Cumene	HAP/TAP	117	0.32	0.013
Ethyl Benzene	HAP/TAP	65	0.18	0.0073
Xylene	HAP/TAP	288	0.78	0.033

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

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

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

^d VOC is regulated as a Criteria Air Pollutant because it is a precursor to Ground Level Ozone (O₃). Annual VOC emissions limited to 99 TPY

Table 6.2. Facility-Wide Potential to Emit (Including 23NOC1587 Project Emissions)

Pollutant	Classification (Criteria ^a /HAP ^b /TAP ^c)	Annual Emissions	Units
PM (Total Particulate)	N/A	65	Tons
PM ₁₀ (Total Particulate) (<= 10)	Criteria	24	Tons
PM _{2.5} (Fine Particulate (<=2.5))	Criteria	18	Tons
VOC ^d (Volatile Organic Compounds as VOC)	N/A	99	Tons
Hazardous Air Pollutants (Total HAP)	HAP	0.23	Tons

Toxic Air Pollutants (Total TAP)	TAP	11	Tons
1,2,4-Trimethylbenzene	TAP	3,259	Lbs
1,3,5-Trimethylbenzene	TAP	1,561	Lbs
Boron & Compounds, NOS	TAP	17,180	Lbs
Cumene	TAP	117	Lbs
Ethyl Benzene	TAP	64	Lbs
Xylene	TAP	288	Lbs

-PTE based on SMO limit, coating material content, and physical capacity of units.

-“NOS” is an abbreviation for “not otherwise specified.”

7. Administrative Requirements for NOC Applications

NOC applications are subject to filing fees according to ORCAA Rule 3.3(b) and may incur additional NOC processing fees at an hourly rate according to ORCAA Rule 3.3(c). Alta paid applicable NOC filing fees for EU8 prior to ORCAA commencing processing of the application and additional filing fees for EU9, EU10, and the request for voluntary limit were paid on November 21, 2023. 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 Alta’s initial NOC application for EU8 was posted on ORCAA’s website on March 15, 2023. The time period for filing comments on the application and requests for a public comment period expired on March 30, 2023. ORCAA did not receive any comments, requests for a public comment period, nor requests for a public hearing.

After the application notice period ended and during the review process the scope of the project changed to include the addition of EU9, EU10, and the request for a voluntary limit on VOC. As these changes triggered a mandatory 30-day public comment period (as described below), ORCAA was not required to hold a 15-day public notice on the revised NOC application (per ORCAA Rule 6.1.3(a)(1)).

Per ORCAA Rule 6.1.3(b)(2), this application requires a mandatory public comment period in accordance with the requirements of ORCAA Rule 6.1.3(c) as:

1. The proposed project causes a significant net increase in emissions of VOC; and
2. The applicant requested a limit on the Potential to Emit under ORCAA Rule 6.1.12.

Therefore, this Preliminary Recommendation is being noticed for a 30-day public comment period in accordance with ORCAA Rule 6.1.3(c). If significant public interest is expressed during the public comment period, a public hearing will be scheduled by ORCAA and the public comment period will be extended through the hearing date.

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.

Lead Agency	Mason County
Determination	DNS, SEPA# SEP2019-00039
Date of Issuance	6/4/2019

9. Criteria for Approval

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

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

The following sections provide more detail on each criterion.

10. Applicable Performance Standards (Summary)

ORCAA’s Rule 6.1.4(a)(1) and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6, require a finding that any new or modified stationary source will likely comply with applicable state, federal and local performance standards for air emissions including emission standards adopted under chapter 70A.15 RCW, emissions standard of ORCAA, and federal emission standards including New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), and National Emission Standards for Hazardous Air Pollutants for Source Categories (MACT standards). The performance standards in Table 10.1 were determined applicable to the proposed stain coating operation. The performance standards in Table 10.2 were determined relevant to the proposed stain coating operation, but inapplicable. A comprehensive list of applicable performance standards that apply to all stationary sources of air pollution located at the facility, as well as general air regulations and standards that apply, are included in the Appendix.

Table 10.1: Applicable Performance Standards specific to the proposed Stain Coating Operation

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	discussion/determination
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
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.
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 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 all fugitive emission sources
Excess Emissions Provisions WAC 173-400-107; WAC 173-400-108 ORCAA 8.7	Requires excess emissions be reported to the Authority 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.

Table 10.2: Relevant Performance Standards Determined Inapplicable

Regulation Title Citation	Relevant Performance Standard Determined Inapplicable	Basis
Particulate Matter (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.	Coating units will not emit significant particulate matter.

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.	Coating units will not emit significant particulate matter.
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.	Coating units will not emit significant particulate matter.
WAC 173-490-207 Surface Coating of Flatwood Paneling	Requires the owner(s) or operator(s) of flatwood paneling surface coating facilities to meet specific VOC emission limits.	Applies to specific VOC-emitting facilities operating in designated ozone nonattainment areas. Mason County is classified as attainment/unclassifiable for ozone.
MACT: National Emission Standards for Wood Furniture Manufacturing Operations <i>40 CFR Part 63, Subpart JJ</i>	Implementing the FCAA, this standard establishes operational standards and recordkeeping requirements for facilities engaged in wood furniture manufacturing operations at major sources of HAP.	Alta is not a major source of HAP.
MACT: Plywood and Composite Wood Products Manufacturers <i>40 CFR Part 63, Subpart DDDD</i>	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.	Alta is not a major source of HAP.
MACT: National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products <i>40 CFR Part 63, Subpart QQQQ</i>	Implementing the FCAA, this standard establishes national compliance options, operating requirements, and work practice requirements for HAP emitted from surface coating of wood building products.	Alta is not a major source of HAP.
MACT: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources <i>40 CFR Part 63, Subpart HHHHHH</i>	<i>National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources</i>	Alta 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, Alta does not meet any applicability requirements per 40 CFR 63.11170(a).

11. Best Available Control Technology (BACT)

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

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

Alta’s consultant provided a top-down BACT analysis for EU8 which could also apply to the other new and modified coating units. ORCAA staff agree with Alta’s conclusion that use of low VOC-content coatings and good work practices such as storing VOC-containing materials in closed containers and cleaning up spills immediately generally meets BACT for VOC emissions associated with this project. Alta worked with manufacturers to reformulate all coating materials at their facility to be able to meet the low-VOC requirement and the work practices will be included in the Conditions of Approval.

BACT for particulate emissions will differ based on coating application techniques. The flood coaters will mechanically apply stain to fence boards preventing particulate emissions from overspray. Confining spray applications of coatings to spray boxes and filtering the exhaust stream through a mist elimination system containing a scrubber is considered to meet BACT for particulate matter for the spray boxes. BACT determinations by EU are identified in Table 11.1 below.

Table 11.1 BACT

EU	Pollutant	BACT Description
EU1- Flow Coater (existing; modified)	VOC	Oil-Based Colorant Applications <ul style="list-style-type: none"> ▪ Use of coatings with a VOC-content less than 1.0 lbs/gal ▪ Operation and maintenance of all coating equipment according to O&M plan ▪ Confining oil-based stain application operations to flood coater booths ▪ Proper disposal and storage of all VOC-containing materials ▪ Good work practices
EU8 - Stain Coating Line controlled by a Flood Coater Booth (new)		
EU2- Spray Box (existing; modified)	VOC PM	Fungicide and Water-Based Colorant Applications <ul style="list-style-type: none"> ▪ Use of water-based stains with a VOC-content less than 0.1 lbs/gal and use of low-VOC content ant-fungal coatings (VOC) ▪ Confining stain application operations to flood coater or spray boxes (VOC) ▪ Confining spray coating operations to spray boxes (VOC and PM) ▪ Good work practices (VOC and PM) ▪ Operation and maintenance of all coating equipment according to O&M plan (VOC and PM) ▪ Proper disposal and storage of all VOC-containing materials (VOC) ▪ Use of enclosed mist eliminator system containing a scrubber with an overall rated control efficiency of at least 98% (PM)
EU9- Spray Box Coater "Transverse" aka "Coater 1" (new)		
EU10- Spray Coater "Coater 2" (new)		

BACT is enforced through Conditions 9 and 10.

12. Ambient Impact Analysis (Criteria Pollutants)

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

The project’s potential to emit for all criteria pollutants are below their respective significant emission level. Therefore, an ambient air quality analysis is not required and it can be concluded emissions are sufficiently low and will not cause or contribute to a violation of any ambient air quality standard.

13. Ambient Impact Analysis (Toxic Air Pollutants)

Washington’s regulation titled Controls for New Sources of Toxic Air Pollutants (Air Toxics Rule) under Chapter 173-460 of the Washington Administrative Code applies to new stationary sources of Toxic Air Pollutants (TAP), including modifications to existing emissions units that increase TAP. The purpose of the Air Toxics Rule is to, “... maintain such levels of air quality as will protect human health and safety.” The TAPs covered under the Air Toxics Rule include carcinogens and non-carcinogens. TAP emissions increases for determining applicability are the increases attributable to the new or modified emissions unit - Decreases from existing

emissions units are not allowed to be subtracted from project-attributable TAP increases when determining applicability. Also, the Air Toxics Rule provides that review of modifications are limited to the emission unit or units proposed to be modified and the TAPs whose emissions would increase as a result of the modification.

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

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

tBACT

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

Table 12.1 tBACT

EU	Pollutant	tBACT Description
EU1- Flow Coater (existing; modified)	TAP	Oil-Based Colorant Applications <ul style="list-style-type: none"> ▪ Use of low-TAP and low-HAP content materials ▪ Operation and maintenance of all coating equipment according to O&M plan ▪ Confining oil-based stain application operations to flood coater booths ▪ Proper disposal and storage of all TAP and HAP-containing materials ▪ Good work practices
EU8 - Stain Coating Line controlled by a Flood Coater Booth (new)		
EU2- Spray Box (existing; modified)	TAP	Fungicide and Water-Based Colorant Applications <ul style="list-style-type: none"> ▪ Confining stain application operations to flood coater or spray boxes ▪ Confining spray coating operations to spray boxes ▪ Good work practices ▪ Operation and maintenance of all coating equipment according to O&M plan ▪ Use of water-based and low-TAP and HAP-containing materials ▪ Proper disposal and storage of all TAP and HAP-containing materials ▪ Use of enclosed mist eliminator system containing a scrubber with an overall rated control efficiency of at least 98%
EU9- Spray Box Coater “Transverse” aka “Coater 1” (new)		
EU10- Spray Coater “Coater 2” (new)		

tBACT is enforced through Condition 9.

Ambient Impact Review

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

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

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

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

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

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

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

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

Emissions calculations and modeling were performed by Alta’s consultant and reviewed by ORCAA staff. Alta calculated emissions based on realistic operating schedules and material usage rates, which does not meet the definition of Potential to Emit, which is defined as the maximum capacity of a stationary source to emit under its physical and operational design. Any physical or operational limitation on the source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation, or on the type or amount of material combusted, stored, or processed, is treated as part of its design if the limitation is federally enforceable. ORCAA staff therefore scaled up calculated emissions to be representative of maximum potential to emit as follows:

1. ORCAA staff scaled-up emissions and modeled concentrations to 24 hours per day for comparison with SQERs and to determine if daily tracking would be required.
2. Cedar Tone was identified as the coating material having the highest content of 1,3,5-Trimethylbenzene per gallon by weight. ORCAA staff scaled up the material usage rate of Cedar Tone to 2,850 gallons/day to determine compliance with 1,3,5-Trimethylbenzene SQER. This material usage rate is not attainable while complying with the 99 TPY VOC limit, so Alta will not need to track Cedar Tone usage on a daily basis to assure compliance.
3. Oxford Brown was identified as the coating material having the highest content of Ethyl benzene per gallon by weight. ORCAA staff scaled up the material usage rate of Oxford Brown to 781,100 gallons/year to determine compliance with Ethyl benzene SQER. This material usage rate is not attainable while complying with the 99 TPY VOC limit, so Alta will not need to track Oxford Brown usage on a daily basis to assure compliance.

The ambient impacts review summary demonstrating compliance with Chapter 173-460 WAC is shown in Table 12.1 below. Results demonstrate that TAP emissions from the new facility will be sufficiently low to protect human health and safety from potential carcinogenic and/or other toxic effects, which meets this approval criteria.

Table 12.1 Ambient Impacts Review

TAP	Averaging Period	Emission Rate (lbs)	SQER	Pass SQER?	Modeled Concentration	ASIL	Pass ASIL Review?
1,2,4-Trimethylbenzene	24-hr	8.9	4.4	No – Model	27	60	Pass
1,3,5-Trimethylbenzene	24-hr	4.3	4.4	Pass		60	
Boron & Compounds, NOS	24-hr	47	22	No – Model	300	300	Pass
Cumene	24-hr	0.32	30	Pass		400	
Ethyl Benzene	year	64	65	Pass		0.40	
Xylene	24-hr	0.78	16	Pass		220	

-Boron & Compounds, NOS emissions based on requested Mycostat IV® limit of 377 gallons/24-hrs. Alta will be required to track Mycostat IV® use.

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

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

Alta is requesting a voluntary limit of 99 TPY for VOC so it is not a “Major Stationary Source” as defined in 40 CFR 52.21(b) and not subject to the permitting program required by WAC 173-400-700 through WAC 173-400-860. Therefore, these permitting requirements do not apply.

15. Title V Air Operating Permit (AOP) Implications

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

With the addition of the equipment approved under this permitting action, Alta’s uncontrolled potential to emit for VOCs is above the 100 ton per year threshold for “Major Stationary Sources” status under the Title V program. However, Alta requested a federally-enforceable plant-wide voluntary limit of 99 tons per year for VOCs. Taking a voluntary limit (also known as a Synthetic Minor limit) is a regulatory option for facilities that could otherwise emit at “Major Stationary Source” levels. By taking a SMO limit, the facility artificially limits its potential to emit and stays out of the Title V program, which has additional monitoring, recordkeeping, and reporting requirements.

ORCAA is proposing to incorporate a voluntary limit per ORCAA Rule 6.1.12 and WAC 173-400-091 into the Order of Approval with monitoring, recordkeeping, and reporting requirements to assure compliance.

Accordingly, Alta will not be a “Major Source” under the Title V program and is not subject to the requirement to operate under an AOP.

16. 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.

16.1 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 Mason County. The Community Report estimates a minority population of 22%, with approximately 6% of the total population speaking Spanish and 2% speaking another Non-English language at home. All demographic indicators were below the 80th percentile for the nation. Likewise, the Community Report indicates that Mason County is below the 80th percentile for all environmental indicators. Environmental indicators above the 80th percentile are an indication that a community already 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 Mason County as a whole is designated "attainment/unclassifiable." Therefore, there are no preexisting nonattainment issues identified within the County. Furthermore, the ambient air quality analysis provided in Alta's application demonstrates that air emissions will not cause or contribute to any exceedance of a NAAQS. 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.

16.2 Engage with Communities

ORCAA's current public noticing and outreach policies and procedures are sufficient to effectively provide notice for the public and meaningfully engage with the community surrounding the proposed project site and include:

- Issuing a press release of the Public Notice.
- Posting the Public Notice, application, and ORCAA's Preliminary Determination on ORCAA's web site.
- Posting hard copies of the Public Notice and ORCAA's Preliminary Determination at a local location near the project site. For this case, copies will be posted at the nearest library, Shelton Timberland Library located at 710 W Alder St in Shelton.
- Emailing the Public Notice to environmental agencies, local tribal nations, organizations and advocacy groups, hospitals, and persons and entities who have expressed interest in the case.

After considering any comments submitted on the case, ORCAA will prepare a written Responsiveness Summary. The Responsiveness summary will include a description of ORCAA's Final Determination as well as responses to questions and comments received during the comment period and public hearing. ORCAA's Responsiveness Summary will be forwarded to all persons and entities who submitted comments during the comment period and public hearing.

16.3 Evaluate Cumulative Impacts

Properties surrounding the facility include wooded land and farmland. There does not appear to be any other nearby sources of emissions with which to evaluate cumulative impacts.

All HAP emitted from the facility are also classified as TAP. Since the applicant's TAP review demonstrated all TAP emissions are below their respective SQER or ASIL, it can be concluded the HAP emissions will not unduly impact potential receptors.

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 since the project's potential to emit for all criteria pollutants are below their respective significant emission level. Therefore, the air analysis can be considered a cumulative analysis with respect to the NAAQS.

16.4 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 proposed project. Principally among these authorities is the requirement to use BACT for controlling emissions. The BACT requirement was applied and corresponding BACT emissions limits are included in the air permit.

17. Conditions of Approval

Since EU1 and EU2 are being modified and were originally permitted under 18NOC1302, ORCAA is superseding the 18NOC1302 permit and including the updated and applicable EU1 and EU2 requirements in this permitting action.

The following conditions of approval were determined necessary for assuring compliance with applicable air regulations and standards and protecting air quality. Recommended conditions of approval will become effective once the Approval Order is issued:

1. **Approved Equipment.** The coating operations as described in Notice of Construction application No. 18NOC1302 and 23NOC1587, application addendums, and the associated Final Determinations are approved for construction and operation subject to conditions in this Order of Approval.
[Regulatory Basis: ORCAA 6.1(a); ORCAA 6.1.2(l); 40 CFR part 52.2470(c), Table 6]
2. **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.

Table 1: Stationary sources located at Alta.

Equipment	EU#	Manufacturer	Specifications
Flow Coater	EU1	Fabricated by Alta	<ul style="list-style-type: none"> ▪ Fully enclosed ▪ Continuous liquid flow application method ▪ Maximum application rate of 10 gallons/hr ▪ Manually fed
Spray Box	EU2	Fabricated by Alta	<ul style="list-style-type: none"> ▪ May be used for the spray-application of paints ▪ Fully enclosed ▪ Mist Elimination system containing a scrubber ▪ Automated line
Cyclone #1	EU3	Hammermill	<ul style="list-style-type: none"> ▪ 7' Diameter ▪ Feeds to chip truck bin ▪ Exhausts to atmosphere ▪ Grandfathered from NSR; included in table for informational purposes only
Cyclone #3		Unknown	<ul style="list-style-type: none"> ▪ 9' Diameter ▪ Feeds to Cyclone #4 ▪ Exhausts to atmosphere ▪ Grandfathered from NSR; included in table for informational purposes only
Cyclone #4		Unknown	<ul style="list-style-type: none"> ▪ 48" Diameter ▪ Next to and above Cyclone #3 ▪ Feeds to chip truck bin ▪ Exhausts to atmosphere ▪ Grandfathered from NSR; included in table for informational purposes only
Cyclone #9		Unknown	<ul style="list-style-type: none"> ▪ Captures metal grindings from saw shop and empties into a small drum ▪ Exhausts to atmosphere

			<ul style="list-style-type: none"> ▪ Grandfathered from NSR; included in table for informational purposes only
Cyclone #10		Donaldson	<ul style="list-style-type: none"> ▪ Drops fines into an open top dumpster ▪ Captures fines from the dog ear machine ▪ Exhausts to atmosphere ▪ Grandfathered from NSR; included in table for informational purposes only
Chipper	EU4	Unknown	<ul style="list-style-type: none"> ▪ 60" ▪ Grandfathered from NSR; included in table for informational purposes only
Chipper		Unknown	<ul style="list-style-type: none"> ▪ 48" ▪ Grandfathered from NSR; included in table for informational purposes only
Debarker		Unknown	<ul style="list-style-type: none"> ▪ Enclosed in metal "housing" ▪ Grandfathered from NSR; included in table for informational purposes only
Truck Bin	EU5	Unknown	<ul style="list-style-type: none"> ▪ Used for bark storage ▪ About 2 truckloads per day ▪ Grandfathered from NSR; included in table for informational purposes only
Truck Bin		Unknown	<ul style="list-style-type: none"> ▪ Used for sawdust ▪ About 2 truckloads per day ▪ Grandfathered from NSR; included in table for informational purposes only
Truck Bin		Unknown	<ul style="list-style-type: none"> ▪ Double chip bin ▪ About 2 truckloads per day ▪ Grandfathered from NSR; included in table for informational purposes only
Log Yard	EU6	N/A	<ul style="list-style-type: none"> ▪ N/A ▪ Grandfathered from NSR; included in table for informational purposes only
Haul Roads	EU7	N/A	<ul style="list-style-type: none"> ▪ N/A ▪ Grandfathered from NSR; included in table for informational purposes only
Flow Coater	EU8	Wood Defender	<ul style="list-style-type: none"> ▪ 136" L x 29 ½" W x 27 ¼" H (dimensions are for informational purposes only) ▪ Enclosed – exhausts to coating room enclosure ▪ Continuous liquid flow application method ▪ Manually fed
"Transverse" aka "Coater 1" Spray Box Coater	EU9	Spray Co	<ul style="list-style-type: none"> ▪ Automated ▪ Fully Enclosed ▪ Mist Elimination system containing a scrubber ▪ Exhausts through stack at 26'-10"
"Coater 2" Spray Coater	EU10	Spray Co	<ul style="list-style-type: none"> ▪ Automated ▪ Fully Enclosed ▪ Mist Elimination system containing a scrubber ▪ Exhausts through stack at 26'-10"

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

3. VOC Emissions Limit. Facility-wide emissions of volatile organic compounds must not exceed 99 tons during any 12-consecutive month period.

[Regulatory Basis: ORCAA Rule 6.1.12; WAC 173-400-091]

4. **Boron Limit.** Emissions of boron & compounds, NOS must not exceed 47 pounds on any calendar day.
[Regulatory Basis: ORCAA Rule 6.1.2(l); ORCAA Rule 6.1.4(a)(5); WAC 173-400-111(10); WAC 173-460-040(3)]
5. **Boron Limit Monitoring.** The owner or operator must monitor compliance with the boron limit in Condition 4 on a daily basis by calculating the daily emissions of Boron & Compounds, NOS using the amount of Boron-containing material applied daily (in gallons) and the Boron & Compounds, NOS content in each gallon as listed on the associated material Safety Data Sheet (SDS). Alternatively, if the Boron & Compounds, NOS content of each material applied is 9% or less by weight, the owner or operator may show compliance with this limit by monitoring the amount of Boron-containing material applied daily (in gallons) and verifying that total usage of Boron-containing compounds is no more than 377 gallons per day.
[Regulatory Basis: ORCAA Rule 6.1.2(l); ORCAA Rule 6.1.4(a)(5); WAC 173-400-111(10); WAC 173-460-040(3)]
6. **VOC Limit Monitoring.** Within 30 days of the end of each month, the owner or operator must determine compliance with Condition 3 by calculating actual emissions of volatile organic compounds (VOC) for the previous month and preceding consecutive 12-month period.
[Regulatory Basis: WAC 173-400-091(3); ORCAA 6.1.12]
7. **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. Emissions from materials purchased in handheld spray cans and materials purchased in containers which are less than one (1) gallon are not required to be accounted for in emissions calculations.
[Regulatory Basis: ORCAA 8.11; WAC 173-400-091(3); ORCAA 6.1.12]
8. **Notification of Changes to Coatings.** The owner or operator must notify ORCAA prior to using any new or reformulated coatings. The notification must include a copy of the Safety Data Sheet (SDS) for the proposed new or reformulated coating. New or reformulated coatings may require approval from ORCAA through a Notice of Construction prior to use.
[Regulatory Basis: ORCAA 6.1(a); ORCAA 6.1.2(l); WAC 173-400-110(2); WAC 173-400-111(10)]
9. **VOC BACT and tBACT for Coating Operations.**
 - a) Oil-based stains and coatings must be applied using non-spray application techniques and coatings must not contain more than 1.0 lbs/gal VOC.
 - b) Water-based stains and coatings must not contain more than 0.1 lbs/gal VOC.
 - c) The owner or operator must use low-VOC content anti-fungal coatings when feasible.
 - d) Keep volatile coating materials in closed containers when not being used.

- e) Storing all solvents or solvent-containing cloth or other materials in closed, airtight containers.
 - f) Minimizing and promptly cleaning up all volatile material spills and leaks.
- [Regulatory Basis: ORCAA 6.1.4(a)(2); WAC 173-400-113(2); WAC 173-460-040(3)(a)]

10. Particulate Matter BACT for Coating Operations.

- a) Spray application of solutions to treat lumber must be conducted in the approved spray booths/spray boxes described in the associated NOC applications (# 18NOC1302 and 23NOC1587). The spray booths/spray boxes must be configured such that all exhaust and overspray is captured and routed through a dedicated mist eliminator system with an overall rated control efficiency of at least 98%.
- b) Spray scrubber water quality, nozzle pressure and water flowrate must be checked daily when lumber is treated and maintained according to the manufacturer's recommendations.
- c) Keep volatile materials in closed containers when not being used.
- d) Operate and maintain the spray booths/spray boxes consistent with the manufacturer's recommendations.
- e) Minimize and promptly clean all volatile material spills and leaks.
- f) Only high-volume low-pressure (HVLP), electrostatic, airless, air-assisted airless equipment, or an equivalent technology capable of at least 65% transfer efficiency may be used for spray application of coatings.
- g) The exhaust stack of all spray boxes must have a vertical discharge to the atmosphere at least six (6) feet above the peak height of the building. There must 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 173-400-113(2); WAC 173-460-040(3)(a)]

11. Operation & Maintenance. Within 30 days of startup, the owner or operator must develop, maintain, and implement an Operations and Maintenance (O&M) plan ensuring facility operations comply with the requirements of this permit. The O&M plan must be made available to equipment operators.

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

12. Recordkeeping. Copies of records must be maintained for a period of at least five years after the date the record is generated. Copies of records must be kept on-site and in a printed or electronic form that is 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, the following records must be kept and updated monthly:

- a) Records of material usage for all VOC-containing materials used in surface coating operations. Records must be sufficient to verify the actual amount of VOC-, HAP-, and TAP-containing materials used in terms of gallons per day and/or month, dependent on the compliance methods in Conditions 5 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.

- b) Records of VOC emissions by month and previous 12-consecutive month VOC emissions.
- c) Safety Data Sheets (SDS) for all VOC-containing materials on site associated with surface coating operations.
- d) Records of monitoring for compliance with boron limit in Condition 4.
- e) The O&M plan required by Condition 11.
- f) Manufacturer written recommendations for maintaining spray booths/spray boxes, and mist eliminator systems.
- g) Record of daily check of spray scrubber water quality, nozzle pressure, and water flowrate for each approved spray booth/spray box.
- h) A daily checklist of monitoring and any maintenance performed per condition 10.
[Regulatory Basis: ORCAA 8.11]

13. **Annual Certification.** The owner or operator must annually certify that its potential to emit is less than that which would require the source to obtain an Air Operating Permit. The document must be certified by a responsible official as required by WAC 173-401-520 and must contain emissions measurement and monitoring data, location of monitoring records, and other information necessary to support the source's emission calculations. The certification must be submitted to ORCAA with the annual emission inventory required by ORCAA Rule 4.3(c) and (d).
[Regulatory Basis: WAC 173-401-300(7)(c)]

17. Preliminary Determination to Approve

This Preliminary Determination documents ORCAA staff's determinations with respect to the applicable criteria of approval in ORCAA Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6. ORCAA staff recommend approval of Alta's proposal to install three lumber coating lines and use reformulated coating materials in all coating lines (new and existing), at their facility and establish a voluntary limit of 99 tons per year on VOCs, provided the conditions identified in Section 16 of this Preliminary Determination are implemented through an enforceable Order of Approval (AKA: Air Permit). Emissions calculations, modeling summary and other data supporting this Preliminary Determination are provided in the permit application and as attachments.

~ end of section ~

Attachments

Applicable Performance Standards that apply to Alta

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.	Alta 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.	Alta 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 registered 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	Prohibits reproducing or altering, or causing to be reproduced or altered, any order, registration certificate or other paper issued by the Agency if the purpose of such reproduction or alteration is to evade or violate any provision of these Regulations or any other law.	Applies generally to all air pollution sources

Attachments

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	Applies to
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 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.	The Approval Order issued in conjunction with this NOC approval must be retained on site.
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,	Applies generally to all air pollution sources

Attachments

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	Applies to
	safety, or welfare of any person, or causes damage to property or business.	
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.
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.
Annual Certification of Emissions WAC 174-401-300(7)(c)	Requires synthetic minor facilities to certify and report annual emissions and submit supporting information.	Registered synthetic minor facilities

