ORDER OF APPROVAL
NOTICE OF CONSTRUCTION 25NOC1707
ISSUED to Port Townsend Cabinet Company on
JUN 0 8 2026

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

Conditional approval to establish and operate a furniture spray coating operation controlled by a spray booth located at 810 Aurora Loop in Port Townsend, Washington ("Approved Location"), for operation solely as described in the associated Notice of Construction ("NOC") application #25NOC1707, is hereby GRANTED to Port Townsend Cabinet Company ("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current owners and operators of the equipment, and Applicant's heirs, successors and assigns unless amended or superseded by a subsequent Order issued by ORCAA or unless the equipment is permanently shut down.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, for the Approved Location, subject to the following Conditions of Approval:

1. **Approved Equipment.** The furniture spray coating operation controlled by a spray booth as described in Notice of Construction application No. 25NOC1707 and the associated Final Determination is approved for construction and operation subject to conditions in this Order of Approval.
   [Regulatory Basis: ORCAA 6.1(a); ORCAA 6.1.2(l); 40 CFR part 52.2470(c), Table 6]

2. **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 Port Townsend Cabinet Company

Emission Unit	Emission Controls
Spray and Surface Coating	Spray Booth • Manufacturer: Global Finishing Solutions • Model #: DFOCG-120806-NSB-2L • Exhaust filtration system with a combined average overspray arrestance rating of at least 98% • Open faced cross draft booth with vertical ceiling exhaust

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

3. **Material Use Prohibitions.** The following is prohibited:
   a. The spray application of materials containing compounds of Chromium, Lead, Manganese, Nickel, or Cadmium ("Target HAP" as defined in 40 CFR Part 63, Subpart HHHHHH); and,
   b. Paint stripping operations that involve the use of chemical strippers that contain methylene chloride (CAS# 75-09-2) in paint removal processes.

   [Regulatory Basis: ORCAA Rule 6.1.4(a)(1); WAC 173-400-113(1)]

4. **Material Use Restrictions.** The facility is authorized to apply coatings not specified in the 25NOC1717 application, provided that the associated Safety Data Sheets (SDS) verify the absence of toxic air pollutants (TAP), (as delineated in WAC 173-460-150); the use of any coating material containing TAP, excluding ethylene glycol monobutyl ether (CAS# 111-76-2), requires prior approval from ORCAA.

   [Regulatory Basis: ORCAA Rule 6.1.2(l); WAC 173-400-111(10)]

5. **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 6.1.4(a)(2]; WAC 173-400-113(2); WAC 173-460-040(3)(a)]

6. **Operation and Maintenance (O&M) Plan.** The owner or operator must maintain and implement an O&M plan to assure continuous compliance with Order of Approval

24NOC1641. The O&M plan must be made available to all operators and contain the following:

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.
b. Approved surface coating booths 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. Spray guns must be cleaned in such a way that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of the container that collects the used gun cleaning solvent.
d. Volatile materials must be kept in closed containers when not being used.
e. Operating and maintaining the surface coating booths consistent with the manufacturer's recommendations.
f. All surface coating operation-related paints, solvents, solvent-containing cloths, or other materials used for surface preparation must be kept in closed, airtight containers.
g. Operators must minimize and promptly clean all volatile material spills and leaks.
h. An operator must inspect the filters each day the spray booth is operated and replace filters when damaged or loaded with particulate build-up to an extent that jeopardizes the effectiveness of the surface coating booth in capturing and controlling emissions. Log any filter changes.

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

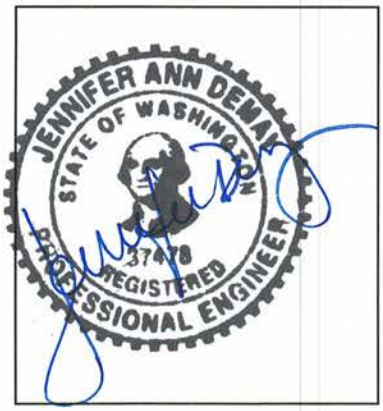
7. **Recordkeeping.** Copies of records must be maintained for a period of at least five years after the date the record is generated. Copies of records must be kept on-site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after the date the 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. Purchase invoices indicating the amount of VOC and TAP-containing materials used in surface coating operations including the date of purchase and corresponding product identification numbers.
   b. Monthly record of the actual cumulative amount of VOC and TAP-containing materials used in surface coating operations in terms of gallons per month.
   c. Safety Data Sheets (SDS) for all VOC and TAP-containing materials on site associated with surface coating operations.
   d. 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.
   e. Records of daily filter checks for each day the spray booth operates.
   f. Logs of filter changes.

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

Lauren Whybrew 6/2/26

PREPARED BY: Lauren Whybrew, Engineer II Date



Jennifer DeMay 6/3/2026

REVIEWED BY: Jennifer DeMay, PE Date

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Executive Director
Jeff C. Johnston

NEW SOURCE FINAL DETERMINATION to APPROVE:

Establishment of a Custom Cabinet Finishing Facility

Niagara Woodwork and Design, LLC DBA: Port Townsend Cabinet Company

NOC# 25NOC1717

June 2, 2026

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NOTICE OF CONSTRUCTION
FINAL DETERMINATION TO APPROVE

Olympic Region Clean Air Agency

Issued to:	**Port Townsend Cabinet Company**	**County:**	**Jefferson (31)**
Location:	**810 Aurora Loop**	**Source:**	**155**
	Port Townsend, WA 98368	**RC:**	**RC5**
Application #:	**NOC# 25NOC1717**	**File:**	**160**
Prepared on:	**June 2, 2026**		

1. Summary

Port Townsend Cabinet Company (PTCC) seeks approval from Olympic Region Clean Air Agency (ORCAA) to install and operate spray finishing equipment for the application of wood coating primers, topcoats, and clear coats to custom cabinet doors and related parts at 810 Aurora Loop, Port Townsend, Washington. Spray coating operations qualify as a new stationary source of regulated air emissions, including particulate matter, volatile organic compounds, hazardous air pollutants and toxic air pollutants. Therefore, ORCAA's review through a Notice of Construction (NOC) permit is required. ORCAA staff reviewed PTCC's proposal and concluded it may be conditionally approved. Recommended conditions of approval are detailed in Section 15 of this Final Determination report.

2. Regulatory Background

Pursuant to the Washington Clean Air Act under chapter 70A.15 of the Revised Code of Washington, ORCAA's Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c)[1] require New Source Review (NSR) for new stationary sources of air pollution (referred to as new sources) in ORCAA's jurisdiction. NSR generally refers to the process of evaluating air quality impacts and the likelihood of compliance with applicable air regulations and standards. NSR and issuance of an Order of Approval by ORCAA is required prior to commencing construction of a new source, modification of a source, or installing, replacing, or substantially altering air pollution control technology. The goal of NSR is to assure compliance with applicable air regulations and standards, including equipment performance standards and ambient air quality standards.

[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.

NSR is initiated by a project proponent submitting an air permit application referred to as Notice of Construction (NOC) application[2], 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 area[3] 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. ***Ambient Air Quality*** – Emissions from the new stationary source will not cause or contribute to a violation of any ambient air quality standard;
4. ***Federal Air Permitting Requirements*** - The new stationary source secures all applicable federal air permits that may apply; and,
5. ***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, PTCC is proposing to install and operate spray finishing equipment for the application of wood coating primers, topcoats, and clear coats to custom cabinet doors and related parts at 810 Aurora Loop, Port Townsend, Washington. Surface coating and spray coating wood primers, topcoats, and clear coats results in emissions of regulated pollutants such as particulate matter, volatile organic compounds, hazardous air pollutants and toxic air pollutants and therefore requires ORCAA's approval via a Notice of Construction (NOC).

3. Facility Background

This is a "green field" facility and the first permitting action; a new building is being constructed that will house operations and particulate matter emissions will be controlled by a spray booth that exhausts out the roof of the new building.

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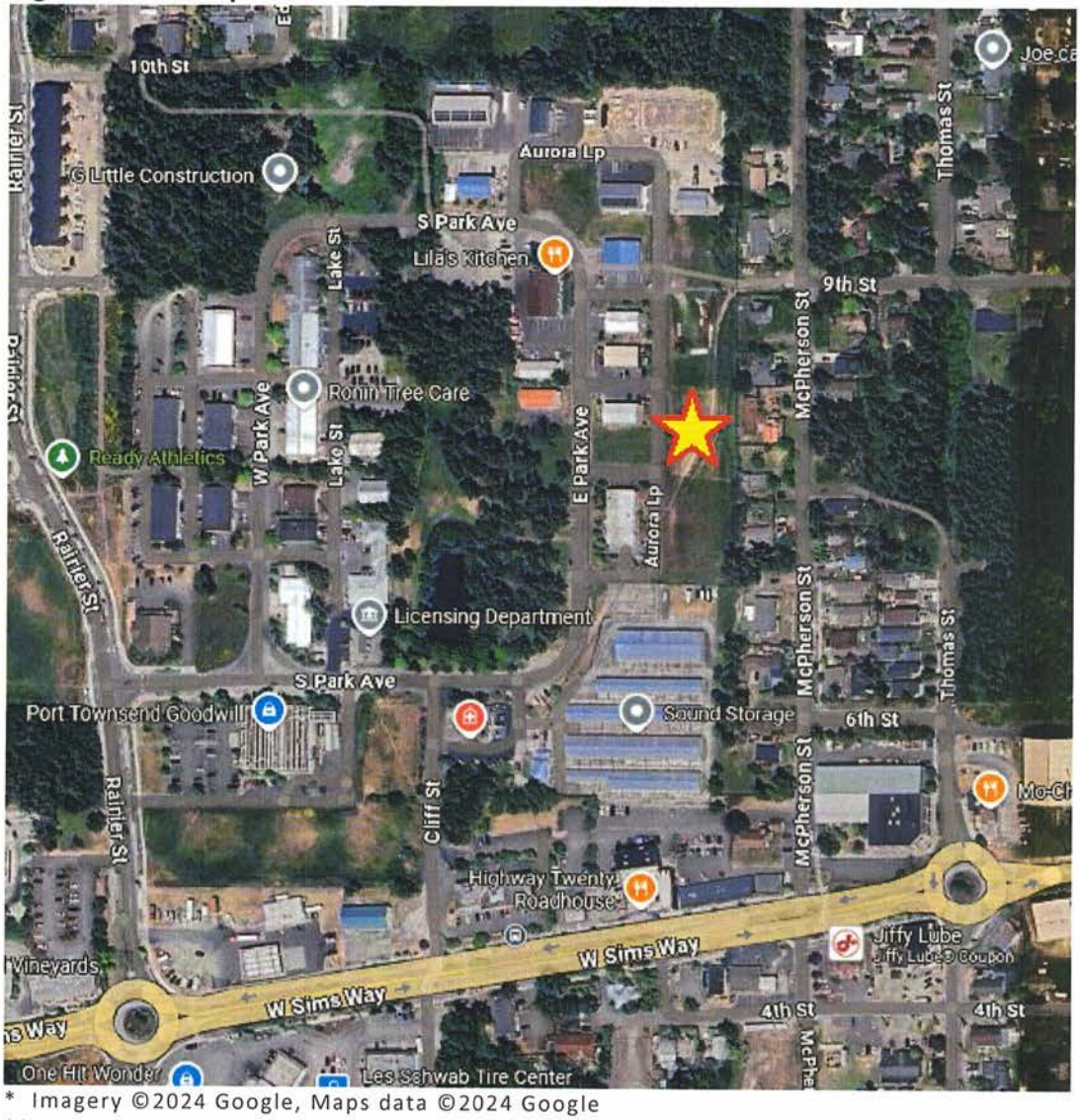
[2] There are two categories of NOC applications: Notice of Construction (NOC) and Notice of Construction Revision (NOR). NOCs are required for new or modified sources, new control technology, replacing an existing stationary source or control technology, and substantially altering control technology. 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.

4. Project Description

PTCC will be moving into a newly constructed building and installing spray finishing equipment for the application of wood coating primer, topcoat, and clear coat. An open-faced cross draft spray booth with vertical (ceiling) exhaust will be installed to control overspray emissions. Sanding will also be done, however the sanders are equipped with attached vacuums and collected dust is directly deposited to an attached bag; no emissions to the air are expected as a result.

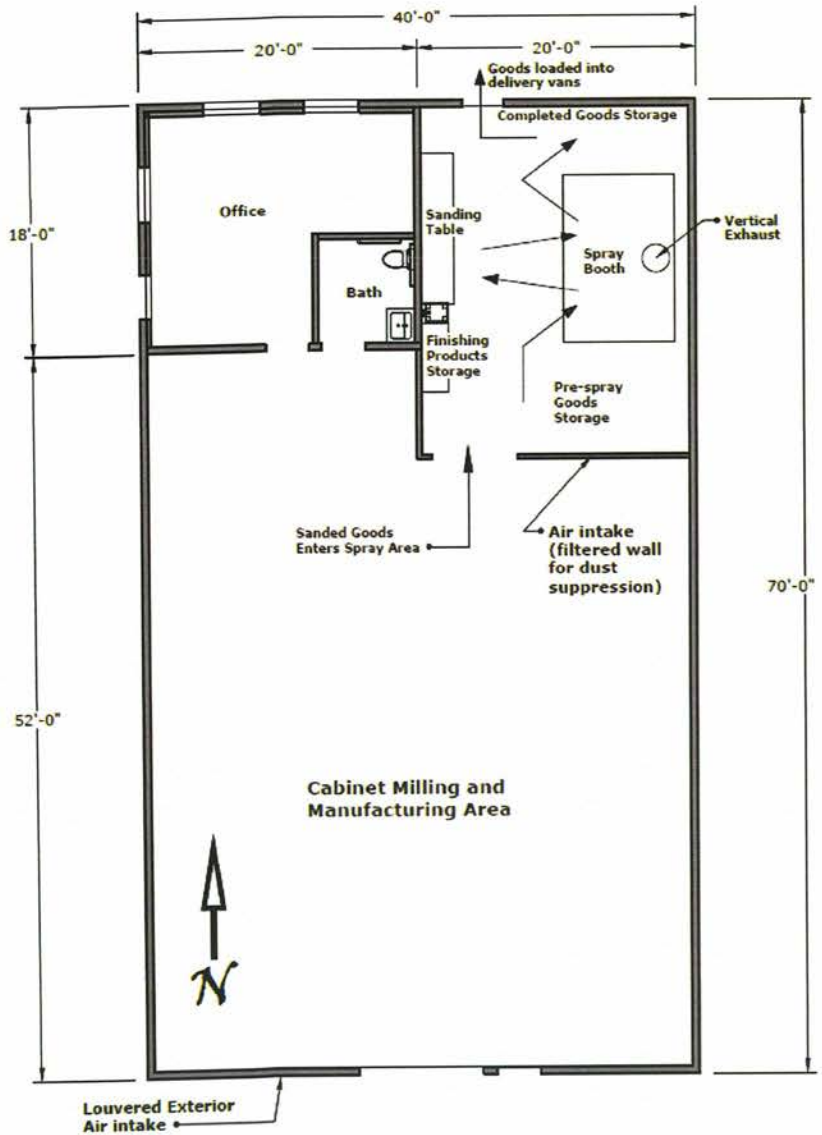
Figure 1: Site Map



* Imagery ©2024 Google, Maps data ©2024 Google

** Annotated by ORCAA

Figure 2: Site Map



Site Map from NOC# 25NOC1717 Application

Table 1. New/Modified Emission Unit

Emission Unit	Description	Emission Controls
Spray Coating	• Air-assisted airless handheld gun to apply wood primers, topcoats, and clear coats.	Spray Booth • Manufacturer: Global Finishing Solutions • Model #: DFOCG-120806-NSB-2L • Serial #: TBD • Open faced cross draft booth with ceiling exhaust • 24" diameter stack at 9,600 CFM
Sanding Table (Insignificant)	• Sanders with vacuums attached; no emissions to air	

5. Emission Increases

Emission increases were estimated by ORCAA staff using material balance based on Safety Data Sheets (SDS) included in the NOC application and estimated usage information by the applicant:

Maximum Usages

The NOC application states that "*an average of 3-5 gallons per week of product will be sprayed, with a daily maximum of 3 gallons*".

NAME OF MATERIAL (as on SDS/ MSDS):	ESTIMATED ANNUAL USAGE (in gallons):
HSC6036	30
HGA14	5
HSA6A484	20
HKR114	30
HBT7A01	30

Image from Form 8 of NOC application

ORCAA staff applied a safety factor of 50% to all calculated emissions for conservatism as a means to reasonably estimate potential to emit from spray coating activities. A transfer efficiency of 65% and filter control of 99.9% (provided in NOC application) was assumed for particulate matter emission control.

Table 2. Emission Increases (Project Emissions)

Pollutant	Classification (Criteria[a]/HAP[b]/TAP[c])	Emission Rate (lb/day)	Emission Rate (lb/yr)
PM (Total Particulate)	-	0.01	0.21
PM_{10} (Total Particulate) (<= 10 µm)[d]	Criteria	0.01	0.21
$PM_{2.5}$ (Fine Particulate (<=2.5 µm)[d]	Criteria	0.01	0.21
Ground Level Ozone (O_3)	Criteria	Not Evaluated Directly	
VOC[e] (Volatile Organic Compounds as VOC)	-	11.1	83.0
SO_2 (Sulfur Dioxide)	Criteria/TAP	Not emitted	
NO_X (Nitrogen Oxides)	-	Not emitted	
CO (Carbon Monoxide)	Criteria/TAP	Not emitted	

Lead	Criteria/HAP/TAP	Not Emitted	
Hazardous Air Pollutants (total HAP)	HAP	0.97	6.45
Toxic Air Pollutants (total TAP)	TAP	2.99	54.05
2-(2-butoxyethoxy)ethanol (CAS# 112-34-5)	HAP[f]	0.97	6.45
Ethylene glycol monobutyl ether (CAS# 111-76-2)	TAP	2.99	54.05

[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] Assume $PM=PM_{10}=PM_{2.5}$

[e] VOC is regulated as a Criteria Air Pollutant because it is a precursor to Ground Level Ozone (O3)

[f] Classified as a Glycol Ether

6. Administrative Requirements for NOC Applications

6.1 Fees

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 PTCC's NOC application were paid prior to ORCAA commencing review of the application. Additional NOC processing fees may apply and will be determined and assessed prior to issuing the Order of Approval.

6.2 Noticing

NOC applications are subject to a minimum 15-day public notice to allow the public to express interest in a permit application and opportunity to request a public comment period. A mandatory public comment period is required if the proposed project triggers noticing under ORCAA Rule 6.1.3(b). A hearing may be requested during the public comment period and the agency may hold a public hearing if it determines significant public interest exists.

Public notice of PTCC's NOC application was posted on ORCAA's website on June 5, 2025. The time period for filing comments on the application and requests for a public comment period expired on June 20, 2025. No comments on the NOC application or requests for a public comment period were received during the NOC application noticing period.

In this case, a mandatory public comment period is not required as the proposed project will not cause a significant net increase in emissions (ORCAA Rule Table 6.1a) and does not meet any of the other criteria for a mandatory public comment period. In addition, a public comment period was not requested during the application notice period and the Executive Director has not determined that there may be substantial public interest in the proposal.

7. 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 City of Port Townsend issued a Determination of Non-significance (DNS) on October 29, 2025, and an addendum to the DNS was issued on April 3, 2026.

8. 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; and,
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.

The following sections provide more detail on each criterion.

9. 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 3 were determined applicable to the proposed wood surface coating and finishing operations. The performance standards in Table 4 were determined relevant to the proposed wood surface coating and finishing operations, 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 3. Applicable Performance Standards specific to the proposed wood surface coating and finishing operations

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.

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	discussion/determination
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
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.	Applies to generally to all stationary process units that exhaust to the atmosphere.
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.
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 4. Relevant Performance Standards Determined Inapplicable

Regulation Title Citation	Relevant Performance Standard Determined Inapplicable	Basis
MACT: National Emission 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.	PTCC 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 HAPs.	PTCC 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 practice requirements for HAP emitted from surface coating of wood building products at major sources of HAPs.	PTCC 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*	PTCC 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, PTCC does not meet any applicability requirements per 40 CFR 63.11170(a).

10. Best Available Control Technology (BACT)

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

New sources of air pollution and modifications to existing sources of air pollution are required to use BACT to control all pollutants not previously emitted, or those for which emissions would increase as a result of the new source or modification. BACT is defined in WAC 173-400-030 as, *"an emission limitation based on the maximum degree of reduction for each air pollutant subject to regulation under chapter 70A.15 RCW emitted from or which results from any new or modified stationary source, which the permitting authority, on a case-by-case basis, taking into account*

energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes and available methods, systems, and techniques, including fuel cleaning, clean fuels, or treatment or innovative fuel combustion techniques for control of each pollutant."

ORCAA staff determined PTCC's proposed emission control technology meets, or is more stringent, than presumed BACT for all pollutants. BACT limits and implementation methods are summarized below in Table 5.

Table 5. BACT Analysis

EU	Pollutant	Proposed BACT Limits	BACT Limits Met Through
EU1 Surface Coating (Spray Booth)	PM, HAP, VOC	▪ Spray booth filters with a combined average overspray arrestance rating of at least 98% ▪ HVLP Spray guns with a transfer efficiency of at least 60% ▪ Use of water-based and low-VOC content materials	▪ Spray coating in spray booth having adequate airflow and a vertical exhaust ▪ Proper disposal and storage of all VOC-containing material ▪ Training in the proper application of surface coatings and the proper setup and maintenance of spray equipment ▪ Operation and maintenance of all spray coating equipment including control device filters according to O&M plan

11. 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 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.

12.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).

12.1 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 10).

ORCAA staff determined PTCC's proposed emission control technology meets, or is more stringent, than presumed tBACT for all pollutants. tBACT limits and implementation methods are summarized below in Table 6.

Table 6. tBACT Analysis

EU	Proposed tBACT Limits	tBACT Limits Met Through
EU1 Surface Coating (Spray Booth)	▪ Spray booth filters with a combined average overspray arrestance rating of at least 98% ▪ HVLP Spray guns with a transfer efficiency of at least 60% ▪ Use of water-based and low-TAP content materials	▪ Spray coating in spray booth having adequate airflow and a vertical exhaust ▪ Proper disposal and storage of all TAP-containing material ▪ Training in the proper application of surface coatings and the proper setup and maintenance of spray equipment ▪ Operation and maintenance of all spray coating equipment including control device filters according to O&M plan

12.2 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 satisfies 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 Order of Approval 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 Order of Approval 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 Order of Approval 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.

ORCAA staff reviewed SDS provided in the NOC application and verified that the potential to emit for all TAP (see Section 5 for details on how potential to emit was estimated) will not exceed any Small Quantity Emission Rates (SQERs) as identified in Chapter 173-460 WAC.

Table 7. Tier I Ambient Impacts Assessment Results

Toxic Air Pollutant	CAS#	SQER (lbs)	Averaging Period	PTE (lbs/averaging period)	Above SQER?
Ethylene glycol monobutyl ether	111-76-2	6.1	24-hr	3.0 lbs/24-hr	No

13. 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.

PTCC 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.

14. 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.

PTCC is not a "Major Source" under the Title V program and is not subject to the requirement to operate under an AOP.

15. Conditions of Approval

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

1. **Approved Equipment.** The furniture spray coating operation controlled by a spray booth as described in Notice of Construction application No. 25NOC1707 and the associated Final Determination is approved for construction and operation subject to conditions in this Order of Approval.
   [Regulatory Basis: ORCAA 6.1(a); ORCAA 6.1.2(l); 40 CFR part 52.2470(c), Table 6]

2. **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 Port Townsend Cabinet Company

Emission Unit	Emission Controls
Spray and Surface Coating	Spray Booth • Manufacturer: Global Finishing Solutions • Model #: DFOCG-120806-NSB-2L • Exhaust filtration system with a combined average overspray arrestance rating of at least 98% • Open faced cross draft booth with vertical ceiling exhaust

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

3. **Material Use Prohibitions.** The following is prohibited:
   a. The spray application of materials containing compounds of Chromium, Lead, Manganese, Nickel, or Cadmium ("Target HAP" as defined in 40 CFR Part 63, Subpart HHHHHH); and,
   b. Paint stripping operations that involve the use of chemical strippers that contain methylene chloride (CAS# 75-09-2) in paint removal processes.

   [Regulatory Basis: ORCAA Rule 6.1.4(a)(1); WAC 173-400-113(1)]

4. **Material Use Restrictions.** The facility is authorized to apply coatings not specified in the 25NOC1717 application, provided that the associated Safety Data Sheets (SDS) verify the absence of toxic air pollutants (TAP), (as delineated in WAC 173-460-150); the use of any coating material containing TAP, excluding ethylene glycol monobutyl ether (CAS# 111-76-2), requires prior approval from ORCAA.

   [Regulatory Basis: ORCAA Rule 6.1.2(l); WAC 173-400-111(10)]

5. **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 6.1.4(a)(2]; WAC 173-400-113(2); WAC 173-460-040(3)(a)]

6. **Operation and Maintenance (O&M) Plan.** The owner or operator must maintain and implement an O&M plan to assure continuous compliance with Order of Approval 24NOC1641. The O&M plan must be made available to all operators and contain the following:
   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.
   b. Approved surface coating booths 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. Spray guns must be cleaned in such a way that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of the container that collects the used gun cleaning solvent.
d. Volatile materials must be kept in closed containers when not being used.
e. Operating and maintaining the surface coating booths consistent with the manufacturer's recommendations.
f. All surface coating operation-related paints, solvents, solvent-containing cloths, or other materials used for surface preparation must be kept in closed, airtight containers.
g. Operators must minimize and promptly clean all volatile material spills and leaks.
h. An operator must inspect the filters each day the spray booth is operated and replace filters when damaged or loaded with particulate build-up to an extent that jeopardizes the effectiveness of the surface coating booth in capturing and controlling emissions. Log any filter changes.

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

7. **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. Purchase invoices indicating the amount of VOC and TAP-containing materials used in surface coating operations including the date of purchase and corresponding product identification numbers.
   b. Monthly record of the actual cumulative amount of VOC and TAP-containing materials used in surface coating operations in terms of gallons per month.
   c. Safety Data Sheets (SDS) for all VOC and TAP-containing materials on site associated with surface coating operations.
   d. 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.
   e. Records of daily filter checks for each day the spray booth operates.
   f. Logs of filter changes.

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

16. Final Determination to Approve

This Final Determination documents ORCAA staff's determinations with respect to the applicable criteria of approval in ORCAA Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6. ORCAA staff recommends approval of PTCC's proposed furniture spray coating operation, provided the conditions identified in Section 15 of this Final Determination are implemented through an enforceable Order of Approval (AKA: Air Permit). Emissions calculations, modeling summary and other data supporting this Final Determination are provided as attachments.

~ end of section ~

6/2/2026

PREPARED BY: Lauren Whybrew, Engineer II **Date**

6/3/2026

REVIEWED BY: Jennifer DeMay, PE **Date**

Applicable Performance Standards that apply to Port Townsend Cabinet Company

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.	PTCC will 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.	PTCC 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	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 Order of Approval 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, safety, or welfare of any person, or causes	Applies generally to all air pollution sources

Attachments

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	Applies to
	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 173-400-108 WAC 173-400-109 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.

OLYMPIC REGION CLEAN AIR AGENCY

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

FORM 1- NOTICE OF CONSTRUCTION

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

Form 1 Instructions:

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

Business Name:
Niagara Woodwork and Design, LLC DBA: Port Townsend Cabinet Company

Mailing Address:
1240 W Sims Way #309, Port Townsend WA 98368

Physical Address of Project or New Source:
810 Aurora Lp, Port Townsend, Wa 98368

Billing Address:
1240 W Sims Way #309, Port Townsend WA 98368

For ORCAA use only

File No: 160
County No: 31
Source No: 155
Application No: 25NOC 1717

Date Received:
Received
MAY 22 2025
ORCAA

Project or Equipment to be installed/established:
Crossdraft Spray Booth

Commence construction date: 8 / 1 / 25 Is facility currently registered with ORCAA? Yes ☐ No ☒

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

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

Name of Owner of Business:
Steve Horstmann

Title: Owner

Email: Stevenhorstmann@gmail.com Phone: 360-292-2088

Authorized Representative for Application (if different than owner):
Same

Title:

Email: Phone:

I hereby certify that the information contained in this application is, to the best of my knowledge, complete and correct.

Signature of Owner or Authorized Representative: (sign in Blue Ink)

Date: 5-20-25

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

Agency Use Only

CONDITIONALLY APPROVED FOR CONSTRUCTION ONLY IN ACCORDANCE WITH RCW 70A.15, WAC 173-400 ORCAA REGULATIONS (SEE ATTACHED ADDENDUM FOR CONDITIONS OF APPROVAL)

6/8/2026
DATE

ORCAA