

August 8, 2001

Mr. Dale Olson, Vice-President of Production
R.D. Olson Mfg, Inc.
PO Box 670
Kelso, WA 98626

Subject: Final Approval for an Increase in Existing Emission Limits

Dear Mr. Olson:

We have not received any adverse response from the public relative to the Preliminary Determination of Order of Approval SWCAA 98-2100R3 for your Notice of Construction Number CO-712 submittal. Based upon the lack of critical response and the fact that more than 15 days time has passed since your draft order was sent to you, we are pleased to issue your final Order of Approval.

This Order of Approval may be appealed directly to the Pollution Control Hearings Board (PCHB) at P.O. Box 40903, Olympia, Washington 98504-0903 within 30 days of receipt of this Order as provided in RCW 43.21B. This Order may also be appealed as provided in SWCAA 400-250.

Thank you for your attention in this matter.

Sincerely,

Robert D. Elliott
Executive Director

RDE:wls
Attachment

1 IN THE MATTER OF COMPLIANCE WITH RCW)
2 70.94 AND THE GENERAL REGULATIONS FOR) SWCAA 98-2100R3
3 AIR POLLUTION SOURCES OF THE SOUTHWEST) ORDER OF APPROVAL
4 CLEAN AIR AGENCY)
5 R. D. Olson Mfg, Inc. RESPONDENT)
6 Kelso, Washington)

8 **BACKGROUND**

- 9 1. Respondent submitted Notice of Construction (NOC) number CO-712 dated June 25, 2001
10 requesting an increase in emission limits for spray coating operations at an existing steel
11 fabrication facility located at 1803 Baker Way in Kelso, Cowlitz County, Washington.
- 12 2. Information contained in NOC CO-712 indicated that:
- 13 a. Spray coating operations at the steel fabrication facility are described as follows:
- 14 (1) All spray coating at the facility is conducted inside a full building enclosure
15 measuring 130 feet long by 50 feet wide by 16 feet high. A negligible
16 amount of touch-up painting is performed outside with a spray can. The
17 spray coating area is exhausted through two filter banks measuring 10 feet
18 long by 3 feet wide, for a total filter area of 60 square feet. The exhaust
19 filters are identified as Fiberbond Corporation model FP200 particulate
20 filters measuring 2 inches in thickness with a documented particulate matter
21 arrestance of 89%. Each filter bank has a rated airflow of 10,000 acfm, and
22 is equipped with a pressure gauge to monitor pressure drop across the filter
23 media;

1 (2) One Modine explosion proof space heater is used to maintain the spray
2 coating area at approximately 80 °F during cold weather. The Modine heater
3 is natural gas fired with a rated heat input of 550,000 Btu/hr; and

4 (3) Spray coatings are applied using high transfer efficiency spray equipment.
5 Equipment currently in use includes, but is not limited to, air assist/airless
6 spray guns.

7 b. VOC emissions from the spray coating operation are limited to 7.5 tons per year
8 (tpy) in accordance with SWCAA 98-2100R2. VOC emissions for calendar year
9 2000 totaled 6.9 tpy. VOC emissions for calendar year 2001 are expected to be
10 close to, or in excess of, 7.5 tpy. Respondent has experienced rapid business
11 growth in recent years, and expects continued growth in the near future.
12 Respondent requests an increase in the current VOC emission limit from 7.5 tpy
13 to 12.0 tpy to accommodate future business growth.

14 c. Emissions from wire welding operations at the facility are increasing as a result of
15 business growth. Respondent estimates maximum anticipated welding rod/wire
16 usage to be:

<u>Rod Type</u>	<u>Annual Consumption</u>
GMAW E70S	57,070 lbs
FCAW E71T	43,565 lbs

20 d. Respondent's facility typically operates a maximum of 4,200 hours per year.
21 However, spray coating is only performed during the night shift, averaging 2,100
22 hours per year.

- 1 e. Respondent maintains a 500 gallon gasoline storage tank and dispensing equipment
2 at the steel fabrication facility. The equipment is used for refueling company
3 vehicles only.
- 4 f. Waste solvent is recovered onsite using a solvent still. Sludge from the still and
5 other waste products are shipped offsite.
- 6 g. No changes have been made to the production equipment or processes approved
7 under Order of Approval SWCAA 98-2100R2.
- 8 3. Order of Approval SWCAA 98-2100R2 was issued to the Respondent on October 24, 2000
9 in response to NOC CO-682. NOC CO-682 requested an increase in the VOC emission
10 limit for an existing spray coating operation. No changes in equipment or process were
11 proposed. Order of Approval SWCAA 98-2100R2 superseded Order of Approval SWCAA
12 98-2100R1, and limited emissions to 7.5 tpy of VOC, 1.0 tpy of particulate matter (PM),
13 and zero percent opacity.
- 14 4. Order of Approval SWCAA 98-2100R1 was issued to the Respondent on July 22, 1998 in
15 response to NOC CO-608 for minor modifications and administrative changes to Order of
16 Approval SWCAA 98-2100. Order of Approval SWCAA 98-2100R1 superseded Order of
17 Approval SWCAA 98-2100.
- 18 5. Order of Approval SWCAA 98-2100 was issued to the Respondent on April 30, 1998 in
19 response to NOC CO-608 for approval of an unpermitted spray coating operation at the
20 Kelso facility. Order of Approval SWCAA 98-2100 approved the spray coating operation
21 as proposed. Emissions from approved operations were limited to 5.0 tpy of VOC, 0.6 tpy
22 of PM, and zero percent opacity.
- 23 6. Emissions to the atmosphere from the steel fabrication facility, as proposed under NOC CO-
24 608, and modified by NOCs CO-682 and CO-712, originate from four sources. Wire

welding operations emit PM and toxic air pollutants (TAPs). Spray coating operations emit PM, VOC, TAPs, and hazardous air pollutants (HAPs). Gasoline storage and dispensing operations emit VOC, TAPs, and HAPs. Natural gas combustion emits NO_x, CO, SO₂, PM, and VOC. Estimated emissions are as follows:

- a. PM emissions from welding operations based on the annual welding rod consumption specified in section 2.b and emission factors from EPA AP-42 Section 12.19 "Arc Welding" (1/95) are estimated to be 0.4 tpy.
- b. PM emissions from spray coating operations based on specified coating consumption of 71,446 pounds per year, an average solids content of 50% by weight, 65% transfer efficiency, and 89% control efficiency are estimated to be 0.7 tpy.
- c. VOC emissions from gasoline storage and dispensing based on the annual throughput of 5,000 gallons per year and an EPA AP-42, Section 5.2 emission factor of 20 pounds per 1,000 gallons of throughput are estimated at 100 pounds per year.
- d. Emissions from operation of the Modine space heater based on emission factors from EPA AP-42 (7/98), Section 1.4, a maximum heat rate of 550,000 BTU per hour, and 8,760 hours of operation per year are estimated to be:

<u>Pollutant</u>	<u>Emission Factors</u>	<u>Emissions</u>
NO _x	0.098 lb/MMBtu	0.24 tpy
CO	0.082 lb/MMBtu	0.20 tpy
SO ₂	0.0006 lb/MMBtu	0.002 tpy
VOC	0.0054 lb/MMBtu	0.01 tpy
PM	0.0075 lb/MMBtu	0.02 tpy

1 e. VOC emissions from spray coating operations based on MSDS product information,
2 material balance methodology, and specified coating/solvent usage are estimated to
3 be 12.0 tpy. Estimated emissions include 12.5 tpy of TAP compounds and 10.7 tpy
4 of HAP compounds. Emissions of individual compounds are quantified in
5 Appendix B.

6 7. Respondent certifies that, based upon the above described parameters:

7 a. The equipment and systems as herein described are acceptable to other agencies
8 with jurisdiction; and

9 b. No other emission sources, activities, or points of atmospheric discharge or
10 contemporaneous emission increases are being proposed for installation at this time.

11 **APPLICABLE REGULATIONS**

12 8. Regulations have been established for the control of air pollutants emitted to the ambient air.
13 Regulations applicable to the proposed facility which have been used to evaluate the
14 acceptability of the proposed facility and establish emission limits and control requirements
15 include, but are not limited to, the following regulations, codes or requirements. These
16 items establish maximum emission limits that could be allowed and are not to be exceeded
17 for new or existing facilities. More stringent limits are established in this Order consistent
18 with implementation of Best Available Control Technology:

19 a. RCW 70.94.141 empowers any activated air pollution control authority to prepare
20 and develop a comprehensive plan or plans for the prevention, abatement and
21 control of air pollution within its jurisdiction. An air pollution control authority
22 may issue such orders as may be necessary to effectuate the purposes of the
23 Washington Clean Air Act [RCW 70.94] and enforce the same by all appropriate

1 administrative and judicial proceedings subject to the rights of appeal as provided
2 in Chapter 62, Laws of 1970 ex. sess.

3 b. RCW 70.94.152 requires that no approval to construct or alter an air contaminant
4 source shall be granted unless all known available and reasonable means of
5 emissions control are provided and that the operation will not aid in the
6 contravention of ambient air quality standards.

7 c. RCW 70.94.152 provides for the inclusion of conditions of operation as are
8 reasonably necessary to assure the maintenance of compliance with the applicable
9 ordinances, resolutions, rules and regulations when issuing an Order of Approval for
10 installation and establishment of an air contaminant source.

11 d. WAC 173-460 "Controls for New Sources of Toxic Air Pollutants" requires Best
12 Available Control Technology for toxic air pollutants (T-BACT), identification and
13 quantification of emissions of toxic air pollutants and demonstration of protection of
14 human health and safety.

15 e. WAC 173-470 "Ambient Air Quality Standards for Particulate Matter" established
16 ambient air quality standards for total suspended particulate matter and for
17 particulate matter smaller than 10 microns (PM₁₀), which may not be exceeded more
18 than one day per year.

19 f. WAC 173-474 "Ambient Air Quality Standards for Sulfur Oxides" establishes
20 ambient air quality standards for sulfur oxides in the ambient air, measured as sulfur
21 dioxide, which shall not exceed:

22 (1) Four-tenths part per million (0.4 ppm) by volume average for a one-hour
23 period more than once per one-year period;

- 1 (2) Twenty-five one-hundredths part per million (0.25 ppm) by volume average
2 for a one-hour period more than twice in a consecutive seven-day period;
- 3 (3) One-tenth part per million (0.1 ppm) by volume average for a one-day period
4 more than once per one-year period; and
- 5 (4) Two one-hundredths part per million (0.02 ppm) by volume average for a
6 one-year period.
- 7 g. WAC 173-475 "Ambient Air Quality Standards for Carbon Monoxide, Ozone, and
8 Nitrogen Dioxide" establishes ambient air quality standards for carbon monoxide,
9 ozone, and nitrogen dioxide in the ambient air, which shall not be exceeded.
- 10 h. SWCAA 400-040 "General Standards for Maximum Emissions" requires all new
11 and existing sources and emission units to meet certain performance standards with
12 respect to Reasonably Available Control Technology (RACT), visible emissions,
13 fallout, fugitive emissions, odors, emissions detrimental to persons or property,
14 sulfur dioxide, concealment and masking, and fugitive dust.
- 15 i. SWCAA 400-040(1) "Visible Emissions" requires that no emission of an air
16 contaminant from any emissions unit shall exceed twenty percent opacity for more
17 than three minutes in any one hour at the emission point, or within a reasonable
18 distance of the emission point.
- 19 j. SWCAA 400-040(2) "Fallout" requires that no emission of particulate matter from
20 any source shall be deposited beyond the property under direct control of the
21 owner(s) or operator(s) of the source in sufficient quantity to interfere unreasonably
22 with the use and enjoyment of the property upon which the material is deposited.
- 23 k. SWCAA 400-040(3) "Fugitive Emissions," requires that reasonable precautions
24 shall be taken to prevent the fugitive release of air contaminants to the atmosphere.

- 1 l. SWCAA 400-040(4) "Odors" requires that any person who shall cause or allow the
2 generation of any odor from any source, which may unreasonably interfere with any
3 other property owner's use and enjoyment of their property must use recognized
4 good practices and procedures to reduce these odors to a reasonable minimum.
- 5 m. SWCAA 400-040(6) "Sulfur Dioxide" requires that no person shall emit a gas
6 containing in excess of one thousand ppm of sulfur dioxide on a dry basis, corrected
7 to 7% O₂ or 12% CO₂ as required by the applicable emission standard for
8 combustion sources.
- 9 n. SWCAA 400-040(8) "Fugitive Dust Sources" requires that reasonable precautions
10 be taken to prevent fugitive dust from becoming airborne, and minimize
11 emissions.
- 12 o. SWCAA 400-050 "Emission Standards for Combustion and Incineration Units"
13 requires that all provisions of SWCAA 400-040 be met and that no person shall
14 cause or permit the emission of particulate matter from any general process
15 operation in excess of 0.23 grams per dry cubic meter (0.1 grains per dry standard
16 cubic foot) of exhaust gas at standard conditions.
- 17 p. SWCAA 400-060 "Emission Standards for General Process Units" requires that all
18 new and existing sources not emit particulate matter in excess of 0.1 grains per dry
19 standard cubic foot of exhaust gas.
- 20 q. SWCAA 400-110 "New Source Review" requires that a Notice of Construction
21 application be filed with SWCAA prior to the establishment of any new source or
22 emission unit or modification and that an Order of Approval be issued prior to
23 establishment of the new source or emission unit or modification.

1 r. SWCAA 400-113 "Requirements for New Sources in Attainment or Nonclassifiable
2 Areas" requires that no approval to construct or alter an air contaminant source shall
3 be granted unless it is evidenced that:

4 (1) The equipment or technology is designed and will be installed to operate
5 without causing a violation of the applicable emission standards;

6 (2) Best Available Control Technology will be employed for all air
7 contaminants to be emitted by the proposed equipment;

8 (3) The proposed equipment will not cause any ambient air quality standard to
9 be exceeded; and

10 (4) If the proposed equipment or facility will emit any toxic air pollutant
11 regulated under WAC 173-460, the proposed equipment and control
12 measures will meet all the requirements of that Chapter.

13 **REGULATORY FINDINGS**

14 9. The proposed equipment and control systems incorporate Best Available Control
15 Technology (BACT) for the types and amounts of air contaminants emitted by the processes
16 as described below:

17 a. The specified use of full building enclosure, vertical dispersion of exhaust streams,
18 high efficiency particulate matter filters, high transfer efficiency spray guns, and low
19 VOC coatings has been determined to meet the requirements of BACT for spray
20 coating operations at this steel fabrication facility;

21 b. BACT for welding operations at this steel fabrication facility have been determined
22 to be no additional controls due to the small quantity of emissions from these
23 sources. Additional control measures have been evaluated, but are not cost
24 effective; and

- 1 c. BACT for gasoline storage and dispensing equipment at this steel fabrication facility
2 have been determined to be no additional controls due to the small quantity of
3 emissions from these sources. Additional control measures have been evaluated, but
4 are not cost effective.
- 5 10. Emissions of other toxic air pollutants (TAPs) were quantified and compared with the Small
6 Quantity Emission Rates (SQERs) listed in WAC 173-460. All emission rates for these
7 pollutants at the proposed level of maximum annual production are below the applicable
8 SQER.
- 9 11. The steel fabrication facility, as proposed in NOC CO-608 and modified by NOCs CO-682
10 and CO-712, will not cause the ambient air quality standards established by Washington
11 Administrative Code (WAC) 173-470 "Ambient Air Quality Standards for Particulate
12 Matter", WAC 173-474 "Ambient Air Quality Standards for Sulfur Oxides", WAC 173-475
13 "Ambient Air Quality Standards for Carbon Monoxide, Ozone, and Nitrogen Dioxide", and
14 Title 40 Code of Federal Regulations Part 50 (40 CFR 50) "National Primary and Secondary
15 Ambient Air Quality Standards" to be violated.
- 16 12. The steel fabrication facility, as proposed in NOC CO-608 and modified by NOCs CO-682
17 and CO-712, if properly installed and maintained, can be operated without causing a
18 violation of emission standards for sources as established under Southwest Clean Air
19 Agency General Regulations Sections 400-040 "General Standards for Maximum
20 Emissions", 400-050 "Emission Standards for Combustion and Incineration Units", and
21 400-060 "Emission Standards for General Process Units".

1 **EMISSION LIMITS/REQUIREMENTS**

2 NOW, HAVING CONSIDERED THIS MATTER AND BEING DULY ADVISED, IT IS
3 HEREBY ORDERED:

4 **OPERATIONAL REQUIREMENTS**

5 13. THAT, this Order supersedes Order of Approval SWCAA 98-2100R2 in its entirety.

6 14. THAT, the steel fabrication facility, as proposed in NOC CO-608 and modified by NOCs
7 CO-682 and CO-712, be approved, subject to the requirements presented below and in
8 Appendices A and B:

9 a. VOC emissions from spray coating operations shall not exceed 12.0 tons per year.
10 Compliance shall be determined based on material VOC content, annual material
11 usage, and material balance methodology.

12 b. Combined PM emissions from welding and spray coating operations shall not
13 exceed 1.5 tpy. Compliance shall be based on annual welding rod and spray coating
14 consumption, emission factors from EPA AP-42 Section 12.19 "Arc Welding"
15 (1/95), average spray coating solids content, 65% spray coating transfer efficiency,
16 and 89% overspray capture efficiency.

17 c. Facilitywide TAP emissions shall not individually exceed the lesser of 5.0 tons per
18 year or the Small Quantity Emission Rate (SQER) for each TAP, as provided in
19 WAC 173-460. Facilitywide TAP emissions shall not collectively cause the VOC
20 limit in section 14.a to be exceeded. Compliance shall be based on annual welding
21 rod and spray coating consumption, emission factors from EPA AP-42 Section
22 12.19 "Arc Welding" (1/95), and material balance methodology.

23 d. Visible emissions from spray building exhaust stacks shall not exceed zero percent
24 opacity for more than 3 minutes in any one hour period as determined by a Certified

1 Observer certified in accordance with 40 CFR 60, Appendix A, Method 9 "Visual
2 Determination of the Opacity of Emissions From Stationary Sources" with data
3 acquisition and reduction as provided in SWCAA 400, Appendix A "SWCAA
4 Method 9".

5 e. Operations that cause or contribute to a nuisance odor shall use recognized good
6 practice and procedures to reduce these odors to a reasonable minimum.

7 f. Particulate filters installed in the spray building filter banks shall have a minimum
8 particulate matter arrestance rating of 89%.

9 g. All spray coating except for incidental touch up with spray cans shall be performed
10 inside the spray building.

11 h. Spray building exhaust shall be discharged vertically at a minimum height of 5 feet
12 above roof peak. Any raincap that interferes with vertical dispersion of exhaust
13 gases is prohibited.

14 i. All spray coating shall be performed with high transfer efficiency equipment
15 including, but not limited to, air assist/airless spray guns except for incidental spray
16 can touch up.

17 j. All containers with VOC laden materials shall be kept securely closed except when
18 in active use. All materials containing VOCs which are used to clean and/or flush
19 spray equipment or lines during cleanup shall be collected in a closed container.

20 k. A differential pressure gauge shall be installed and maintained on each filter bank to
21 continuously measure differential pressure across the particulate filters.

22 l. All windows and doors shall be kept closed during spray coating operations.

23 m. Respondent shall maintain purchase receipts and MSDS information for all coating
24 and solvent products consumed at the facility in a readily accessible form.

1 n. An Operations and Maintenance (O/M) log, including the date and name of the
2 person making each entry, shall be maintained for the steel fabrication facility listed
3 in this Order to document the following:

- 4 (1) Differential pressure across spray building filters recorded weekly;
- 5 (2) Spray building filter replacement recorded for each occurrence;
- 6 (3) Amounts and types of hazardous waste disposed recorded monthly; and
- 7 (4) Upset conditions or breakdowns recorded for each occurrence.

8 The O/M log shall be kept available on site for inspection by SWCAA
9 representatives. All records shall be maintained for a minimum period of three (3)
10 years.

11 o. The following records shall be reported to SWCAA as indicated below:

- 12 (1) Material throughput (coatings/solvents, welding rod, natural gas) reported by
13 March 15th for the previous calendar year;
- 14 (2) Natural gas usage for Modine heater reported by March 15th for the previous
15 calendar year;
- 16 (3) Welding rod usage reported by March 15th for the previous calendar year;
- 17 (4) Estimate of air emissions reported by March 15th for the previous calendar
18 year; and
- 19 (5) Upset conditions reported to SWCAA as soon as possible in accordance with
20 SWCAA 400-107.

21 15. In order to remain exempt from the provisions of Title V of the Federal Clean Air Act,
22 emissions of hazardous air pollutants as defined in Section 112(b) of the 1990 Federal
23 Clean Air Act (FCAA) shall not exceed 10.0 tons per year of any single HAP on an

1 annual average rolled monthly and 25.0 tons per year of any combination of HAPs on an
2 annual average rolled monthly.

3 16. THAT, Respondent shall provide written notice to SWCAA at least seven days in
4 advance of the use of any coating material which contains toxic or hazardous air
5 pollutants not listed in Appendix B to this Order. The written notice shall include the
6 following:

7 a. A description of the proposed change(s) in coating with a MSDS for each new
8 material;

9 b. The date the change(s) in coating is/are to be made;

10 c. The change(s) in emissions of VOCs, HAPs and TAPs occurring as a result of the
11 change; and

12 d. A summary of any applicable requirement(s) that would apply as a result of the
13 change(s).

14 If the proposed emission rate of a new TAP exceeds its SQER and/or the VOC limits
15 established by this Order or otherwise circumvents an applicable requirement including
16 those established by this Order, New Source Review shall be required prior to making the
17 proposed change.

18 17. THAT, the emission units specified in NOC CO-712 shall be maintained and operated in
19 total and continuous conformity with the emissions levels afforded by BACT. If the
20 requirements specified in this section and Appendix A cannot be maintained, then operation
21 of the affected emission unit shall be terminated until corrective action has been completed.

22 GENERAL REQUIREMENTS

23 18. THAT, for the purpose of ensuring compliance with this Order, duly authorized
24 representatives of the Southwest Clean Air Agency shall be permitted access to

1 Respondent's premises and the facilities being constructed, owned, operated and/or
2 maintained by Respondent for the purpose of inspecting said facilities. These inspections
3 are required to determine the status of compliance with this Order and applicable regulations
4 and to perform or require such tests as may be deemed necessary.

5 19. THAT, the provisions, terms and conditions of this Order shall be deemed to bind
6 Respondent, its officers, directors, agents, servants, employees, successors and assigns, and
7 all persons, firms, and corporations acting under or for it.

8 20. THAT, this Order shall be posted conspicuously at or be readily available near the source.

9 21. THAT, this Order does not supersede requirements of other Agencies with jurisdiction and
10 further, this Order does not relieve Respondent of any requirements of any other
11 governmental Agency. In addition to this Order, Respondent may be required to obtain
12 permits or approvals from other agencies with jurisdiction.

13 22. THAT, compliance with this Order of Approval and its requirements does not relieve
14 Respondent from the responsibility of compliance with SWCAA General Regulations for
15 Air Pollution Sources, previously issued Regulatory Orders, RCW 70.94, Title 173 WAC or
16 any other applicable emission control requirements, nor from the resulting liabilities and/or
17 legal remedies for failure to comply.

18 23. THAT, for the purpose of ensuring compliance with the terms of this Order and applicable
19 federal, state, and local requirements, the Southwest Clean Air Agency, in accordance with
20 RCW 70.94, retains the right to impose additional requirements on this source as necessary.

21 24. THAT, Respondent shall have the burden of proof regarding unavoidable conditions that
22 lead to excess emissions in accordance with SWCAA 400-107 "Excess Emissions." Excess
23 emissions shall be reported to SWCAA as soon as possible. Respondent shall call in the
24 upset condition via telephone as initial notification to SWCAA; a message may be left on

1 the answering machine for conditions outside of normal business hours. Respondent shall
2 record the upset conditions in the operations log for periodic inspection by SWCAA. A full
3 report may be required by SWCAA if determined to be necessary.

4 25. THAT, if any provision of this Order shall be declared invalid by any court of competent
5 jurisdiction, all unaffected provisions of this Order shall remain in effect and be enforceable.

6 26. THAT, the requirements of this Regulatory Order shall survive any transfer of ownership of
7 the source or any portion thereof.

8 DATED this 8th day of August, 2001

9
10 Reviewed by: _____

11 Paul T. Mairose, P.E.

12 Chief Engineer

13
14 Authorized by: _____

15 Robert D. Elliott

16 Executive Director

17 Southwest Clean Air Agency

Appendix A **Page 1 of 3**
Condensed Summary of Operational Requirements

R.D. Olson Mfg, Inc. Order of Approval No. 98-2100R3
Increase in Emission Limits

This Order supersedes Order of Approval SWCAA 98-2100R2 in its entirety.

1. Emissions Limitations:

Approval Limit/Requirements:

- | | | |
|----|---|--|
| a. | VOC emissions from spray coating operations | Shall not exceed 12.0 tpy |
| b. | Combined PM emissions from welding and spray coating operations | Shall not exceed 1.5 tpy |
| c. | Facilitywide TAP emissions | Shall not individually exceed the lesser of 5.0 tpy or SQER pursuant to WAC 173-460, nor collectively cause the facilitywide VOC limit in Section 1.a to be exceeded |
| d. | Visible emissions from spray building exhaust | Shall not exceed 0% opacity* |

* Shall not exceed listed value for greater than 3 minutes in any one-hour period as determined by a Certified Observer certified in accordance with EPA Method 9 with data reduction as specified in SWCAA 400-040(1).

- | | | |
|----|--|---|
| e. | Emissions to the atmosphere which cause or contribute to a nuisance odor | Shall use recognized good practice and procedures to reduce these odors to a reasonable minimum |
|----|--|---|

2. Operational Limitations:

- | | | |
|----|--|---|
| a. | PM arrestance rating of spray building exhaust filters | Shall be a minimum of 89% |
| b. | Spray coating operations | Shall be performed inside the spray building except for touch-up coating via spray can. All windows and doors shall be kept closed during spray coating |
| c. | Spray equipment | Shall be high transfer efficiency systems except for spray cans |
| d. | Containers for VOC laden material | Shall be kept securely closed when not in active use |

Appendix A
Condensed Summary of Operational Requirements

R.D. Olson Mfg, Inc. Order of Approval No. 98-2100R3
Increase in Emission Limits

2. Operational Limitations (con't):

Approval Limit/Requirements:

- | | |
|--------------------------------|---|
| e. Spray building exhaust | Shall be discharged vertically at a minimum height of 5 feet above roofline. Any raincap that interferes with vertical dispersion is prohibited |
| f. Differential pressure gauge | Shall be installed and maintained on each filter bank to continuously monitor differential pressure across each filter bank |

3. Monitoring/Recordkeeping Requirements:

- | | |
|--|---|
| a. Operation and Maintenance (O/M) log | Shall be kept onsite. Each entry shall include the date and name of the person making the entry, and be maintained for a minimum period of 3 years. |
| b. Spray building filter replacement | Shall be recorded in O/M log for each occurrence |
| c. Differential pressure across spray building filters | Shall be recorded in O/M log weekly |
| d. Amount/type of hazardous waste disposed | Shall be recorded in O/M log monthly |
| e. Upset condition or breakdown | Shall be recorded in O/M log for each occurrence |

Appendix A
Condensed Summary of Operational Requirements

R.D. Olson Mfg, Inc. Order of Approval No. 98-2100R3
Increase in Emission Limits

4. Reporting Requirements:

- | | | |
|----|-------------------------------------|--|
| a. | Annual material throughput | Reported to SWCAA by March 15 th for the previous calendar year |
| b. | Natural gas usage for Modine heater | Reported to SWCAA by March 15 th for the previous calendar year |
| c. | Welding rod usage | Reported to SWCAA by March 15 th for the previous calendar year |
| d. | Estimate of air emissions | Reported to SWCAA by March 15 th for the previous calendar year |
| e. | Upset conditions | Reported to SWCAA via telephone in accordance with SWCAA 400-107 |

Appendix B
Summary of Toxic Air Pollutants

R.D. Olson Mfg, Inc. Order of Approval No. 98-2100R3

Compound	<u>CAS Number</u>	<u>Toxic Class</u>	<u>ASIL</u> ($\mu\text{g}/\text{m}^3$)	<u>SQER</u> (lb/yr)	<u>Emissions</u> (lb/yr) ¹
Acetone	67-64-1	B	5900 ³	43,748	204.9
Butane	106-97-8	B	6300 ³	43,748	118.7
n-Butyl alcohol	71-36-3	B	500 ³	43,748	38.2
sec-Butyl alcohol	78-92-2	B	1000 ³	43,748	3,282.8
2-butoxyethanol	111-76-2	B	2000 ³	43,748	9,923.1
Carbon black	1333-86-4	B	12 ³	43,748	11.4
Diacetone alcohol	123-42-2	B	790 ³	43,748	11.4
Ethyl benzene	100-41-4	B	1000 ³	43,748	1,900.8
Methyl ethyl ketone	78-93-3	B	1000 ³	43,748	96.3
Toluene	108-88-3	B	400 ³	43,748	321.1
Xylene	1330-20-7	B	1500 ³	43,748	9,179.5

1. Estimated emissions are based on material consumption and controlled emission rates. The annual small quantity emission rate was compared with the actual emission rate to confirm compliance.
2. Annual average
3. 24 hour average

CAS = Chemical Abstract Service registry number

ASIL = Acceptable Source Impact Level established under WAC 173-460

SQER = Small Quantity Emission Rate established under WAC 173-460

Material consumption data provided by the Respondent

State Environmental Policy Act

DETERMINATION OF NONSIGNIFICANCE (DNS)

Description of proposal:

NOC CO-712: Request for an increase in existing emission limits. Proponent operates a steel fabrication facility with welding and spray coating operations. Business growth at the facility has caused air emissions to increase. Existing emission limits are being increased to accommodate the growth. High efficiency particulate filters and vertical dispersion will be used to minimize the impact of emissions on the atmosphere.

Proponent:

R.D. Olson Mfg, Inc. (Dale Olson, Vice President of Production)

Location of proposal, including street address if any:

1803 Baker Way in Kelso, Washington 98626

Lead agency: Southwest Clean Air Agency

The lead agency for this proposal has determined that it does not have a probable significant impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.

- There is no comment period for this DNS.**
- This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 15 days from the date below. Comments must be submitted by _____.**

Responsible official: Paul T. Mairose, P.E.

Position/title: Chief Engineer

Address: Southwest Clean Air Agency
1308 NE 134th Street
Vancouver, WA 98685-2747

Phone: (360) 574-3058 ext 30

Signature: _____

Date: _____