



# AIR OPERATING PERMIT

Puget Sound Air Pollution Control Agency  
110 Union Street, Suite 500  
Seattle, Washington 98101

Issued in accordance with the provisions of PSCAA Regulation I, Article 7; and Chapter 173-401 WAC.

<b>PERMIT NO.: 10911</b>	<b>DATE OF ISSUANCE: July 30, 2002</b> <b>Administrative Amendment 1: August 1, 2003</b>
<b>ISSUED TO: PROFESSIONAL COATINGS INCORPORATED</b> <i>Formally Girard Custom Coaters</i>	
<b>PERMIT EXPIRATION DATE: July 30, 2007</b>	

Issued in accordance with the provisions of Puget Sound Clean Air Agency (previously known as Puget Sound Air Pollution Control Agency (PSCAA)) Regulation I, Article 7 and Chapter 173-401 WAC.

Pursuant to Puget Sound Clean Air Agency Regulation I, Article 7 and Chapter 173-401 WAC, Professional Coatings Inc. is authorized to operate subject to the terms and conditions in this permit.

NAICS Code: #321999  
Nature of Business: Wood Products  
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## I. EMISSION LIMITS AND PERFORMANCE STANDARDS

The following tables list the citation for the “applicable requirement” in the second column. The third column (Date) contains the adoption or effective date of the requirement. In some cases, the effective dates of the Federally Enforceable Requirement and the State Only Requirement are different because only rules approved by EPA through Sections 110, 111, and 112 of the federal Clean Air Act are federally enforceable and either the state has not submitted the regulation to the EPA or the EPA has not approved it.

The first column is used as an identifier for the requirement, and the fourth (Requirement Paraphrase) and sixth (Emission Standard Period) columns paraphrase the requirement. The first, fourth, and sixth columns are for information only and are not enforceable conditions of this permit. The actual enforceable requirement is embodied in the requirement cited in the second column and third column.

The fifth column (Monitoring & Recordkeeping Method) identifies the activities that Professional Coatings Inc. shall use to assure compliance with the applicable requirements identified in the second column. These methods are described in Section II of this permit. Following the method is a requirement of this permit. The last column (Emission Standard Reference Test Method) is the official method used to determine violations of the emission standard and is a requirement of the permit. If the results of the Monitoring and Recordkeeping Method and the Emission Standard Reference Test Method differ, the results of the Emission Standard Reference Test Method prevail. In some cases where the applicable requirement does not cite a test method, one has been added.

Professional Coatings Inc. is subject to all the requirements in all the tables listed below. The paraphrasing contained in the fourth and sixth columns below is intended only to generally state the relevant requirements for the purposes of the table, but not intended in any way to alter or change the meaning of any requirement referenced in the second column.

In the event of conflict or omission between the information contained in the fourth and sixth columns and the actual statute or regulation cited in the second column, the requirements and language of the actual statute or regulation cited shall govern. For more information regarding any of the requirements cited in the second column, refer to the actual requirements cited.

**A. FACILITY-WIDE EMISSIONS LIMITS**

The requirements in Section I. A. apply facility-wide to all the emission units regulated by this permit.

**Table 1 Facility-Wide Applicable Requirements**

Requirement No.	Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring & Recordkeeping Method (See Section II)	Emission Standard Period (Info Only)	Emission Standard Reference Test Method
IA.1	<p>Puget Sound Clean Air Agency Reg I: 9.03 <i>This requirement will be superseded upon adoption of the 3/11/99 version of Reg I: 9.03 into the SIP</i></p> <p>WAC 173-400-040(1) <i>This requirement will be superseded upon adoption of the 9/15/01 version of WAC 173-400-040(1) into the SIP</i></p> <p>Puget Sound Clean Air Agency Reg. I: 9.03 (State Only) <i>This requirement will become federally enforceable upon adoption into the SIP and will replace the 9/08/94 version of Reg I: 9.03</i></p> <p>WAC 173-400-040(1) (State Only) <i>This requirement will become federally enforceable upon adoption into the SIP and will replace the 9/20/93 version</i></p>	<p>09/08/94</p> <p>09/20/93</p> <p>03/11/99</p> <p>9/15/01</p>	<p>Shall not emit air contaminants in excess of 20% opacity for more than 3 minutes per hour</p>	<p>Section II.1.(a) Opacity Monitoring</p>	<p>More than 3 min. in any 1 hr</p>	<p>Ecology Method 9A (See Section IX)</p>

Requirement No.	Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring & Recordkeeping Method (See Section II)	Emission Standard Period (Info Only)	Emission Standard Reference Test Method
IA.2	Puget Sound Clean Air Agency Reg I: 9.07 WAC 173-400-040(6) first paragraph only. <i>This requirement shall be superseded by the 9/15/01 version of WAC 173-400-040(6) upon its adoption into the SIP</i> WAC 173-400-040(6) first paragraph only (State Only). <i>This requirement will become federally enforceable upon adoption into the SIP and will replace the 9/20/93 version of WAC 173-400-040(6)</i>	4/14/94  9/20/93  9/15/01	Shall not emit SO <sub>2</sub> in excess of 1,000 ppmv (dry) corrected to 7% O <sub>2</sub> for fuel burning equipment	No monitoring required	1-hr tests	EPA Method 6C (See 40 CFR Part 60, Appendix A, July 1, 2001)

Requirement No.	Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring & Recordkeeping Method (See Section II)	Emission Standard Period (Info Only)	Emission Standard Reference Test Method
IA.3	Puget Sound Clean Air Agency Reg I: 9.09(a) <i>This requirement will be superseded upon adoption of the 4/9/98 version of Reg I: 9.09 into the SIP</i>	02/10/94	Shall not emit particulate matter in excess of 0.05 gr/dscf	Section II.1.(a) Opacity Monitoring	1-hr tests	Puget Sound Clean Air Agency Method 5 (See Section IX)
	Puget Sound Clean Air Agency Reg I: 9.09 <i>This (State Only) requirement will become federally enforceable and will be effective in this table upon adoption of the 4/9/98 version of Reg I: 9.09 into the SIP</i>	04/09/98				
	[WAC 173-400-060 (State Only) [WAC 173-400-060	3/22/91 9/15/01	Shall not emit particulate matter in excess of 0.1 gr/dscf			

Requirement No.	Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring & Recordkeeping Method (See Section II)	Emission Standard Period (Info Only)	Emission Standard Reference Test Method
IA.4	<p>Puget Sound Clean Air Agency Reg I: 9.11(a) <i>This requirement will be superseded upon adoption of the 3/11/99 version of Reg I: 9.11(a) into the SIP</i></p> <p>WAC 173-400-040(5)</p> <p>Puget Sound Clean Air Agency Reg I: 9.11(a) <i>(State Only) This requirement will become federally enforceable upon adoption into the SIP and will replace the 6/9/83 version of Reg I: 911(a)</i></p> <p>WAC 173-400-040(5) <i>(State Only)</i></p>	<p>06/09/83</p> <p>9/20/93</p> <p>9/20/93</p> <p>3/11/99</p> <p>9/15/01</p>	<p>Shall not emit air contaminants in sufficient quantities and of such characteristics and duration as is, or is likely to be, injurious to human health, plant or animal life, or property, or which unreasonably interfere with enjoyment of life and property</p>	<p>Section II.1.(b) Complaint Response</p> <p>Section II.1.(f) Fugitive Dust, Track-Out, and Odor Bearing Contaminants</p>	<p>N/A</p>	<p>N/A</p>

Requirement No.	Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring & Recordkeeping Method (See Section II)	Emission Standard Period (Info Only)	Emission Standard Reference Test Method
IA.5	Puget Sound Clean Air Agency Reg I: 9.15 <i>This requirement will be superseded upon adoption of the 3/11/99 version of Reg I: 9.15 into the SIP</i>	8/10/89	(a) Shall not emit visible dust unless BACT is employed to control the emissions  (b) Unlawful to operate a vehicle on paved public roads unless: (1) The vehicle is constructed or loaded to prevent load from escaping or spilling; (2) The vehicle is covered to prevent load from escaping or spilling if loaded with gravel or dirt; and (3) Mud, dirt, and other debris is cleaned from the chassis and tires of the vehicle  (c) Unlawful to allow emission of fugitive dust from any refuse or fuel burning, manufacturing, or emissions control equipment  (d) Unlawful to allow emission of fugitive dust in such quantities and of such characteristics and duration as is, or is likely to be, injurious to human health, plant or animal life, or which unreasonably interferes with enjoyment of life and property	Section II.1.(f) Fugitive Dust, Track-Out, and Odor Bearing Contaminants	N/A	N/A

Requirement No.	Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring & Recordkeeping Method (See Section II)	Emission Standard Period (Info Only)	Emission Standard Reference Test Method
IA.6	Puget Sound Clean Air Agency Reg I: 9.15 ( <i>State Only</i> ) <i>This requirement shall become federally enforceable upon adoption into the SIP and will replace the 8/10/89 version of Reg I:9.15</i>	3/11/99	It shall be unlawful for any person to cause or allow visible emissions of fugitive dust unless reasonable precautions are employed to minimize the emissions. Reasonable precautions include, but are not limited to, the following:  (1) The use of control equipment, enclosures, and wet (or chemical) suppression techniques, as practical, and curtailment during high winds; (2) Surfacing roadways and parking areas with asphalt, concrete, or gravel; (3) Treating temporary, low-traffic areas (e.g., construction sites) with water or chemical stabilizers, reducing vehicle speeds, constructing pavement or rip rap exit aprons, and cleaning vehicle undercarriages before they exit to prevent the track-out of mud or dirt onto paved public roadways; or (4) Covering or wetting truck loads or allowing adequate freeboard to prevent the escape of dust-bearing materials	Section II.1.(f) Fugitive Dust, Track-Out, and Odor Bearing Contaminants	N/A	N/A

Requirement No.	Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring & Recordkeeping Method (See Section II)	Emission Standard Period (Info Only)	Emission Standard Reference Test Method
IA.7	<p>WAC 173-400-040(3) &amp; (8)  <i>These requirements will be superseded upon adoption of the 9/15/01 versions of WAC 173-400-040(3) &amp; (8) into the SIP</i></p> <p>WAC 173-400-040(3) &amp; (8)  <i>(State Only). These requirements will become federally enforceable upon adoption into the SIP and will replace the 8/20/93 versions of WAC 173-400-040(3) &amp; (8)</i></p>	<p>08/20/93</p> <p>9/15/01</p>	<p>Shall not emit visible dust unless reasonable precautions are employed to minimize the emissions</p>	<p>Section II.1.(f)            Fugitive Dust, Track-Out, and Odor Bearing Contaminants</p>	<p>N/A</p>	<p>N/A</p>
IA.8	<p>Puget Sound Clean Air Agency Reg I: 9.20(b)</p>	<p>6/09/88</p>	<p>Must maintain equipment not subject to Puget Sound Clean Air Agency Reg. I, Section 9.20(a) in good working order</p>	<p>Section II .1.(e)            Maintenance and Repair of Insignificant Emission Units</p> <p>Section II.2.4. (a)            Operation and Maintenance (O&amp;M) Plan Requirements.</p>	<p>N/A</p>	<p>N/A</p>

Requirement No.	Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring & Recordkeeping Method (See Section II)	Emission Standard Period (Info Only)	Emission Standard Reference Test Method
IA.9	<p>Puget Sound Clean Air Agency Reg I: 7.09(b) <i>This requirement will be superseded upon adoption of the 9/10/98 version of Reg I: 7.09(b) into the SIP</i></p> <p>Puget Sound Clean Air Agency Reg I: 7.09(b) (State Only) <i>This requirement shall become federally enforceable upon adoption into the SIP and will replace the 9/12/96 version of Reg I:7.09(b)</i></p>	<p>09/12/96</p> <p>09/10/98</p>	Must develop and implement an O&M Plan to assure continuous compliance with Puget Sound Clean Air Agency Regulations I, II, III	<p>Section II.2.4.(a) Operation and Maintenance (O&amp;M) Plan Requirements.</p> <p>Section II .1.(e) Maintenance and Repair of Insignificant Emission Units</p>	N/A	N/A
IA.10	WAC 173-400-040(4) (State Only)	8/20/93	Must use recognized good practice and procedures to reduce odors which may unreasonably interfere with any other property owners' use and enjoyment of their property	<p>Section II.2.4.(a) Operation and Maintenance (O&amp;M) Plan Requirements.</p> <p>Section II .1.(e) Maintenance and Repair of Insignificant Emission Units</p> <p>Section II. 1.(b) Complaint Response</p>	N/A	N/A
IA.11	WAC 173-400-040(2) (State Only)	8/20/93	Shall not deposit particulate matter beyond property boundary in sufficient quantity to interfere unreasonably with the use and enjoyment of the property	II.1.(f) Fugitive Dust, Track-Out, and Odor Bearing Contaminants	N/A	N/A

Requirement No.	Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring & Recordkeeping Method (See Section II)	Emission Standard Period (Info Only)	Emission Standard Reference Test Method
IA.12	RCW 70.94.040 <i>(State Only)</i>	1996	Shall not emit air contaminants in sufficient quantities and of such characteristics and duration as is, or is likely to be, injurious to human health, plant or animal life, or property, or which unreasonably interferes with enjoyment of life and property or cause a violation of RCW 70.94 or any regulation adopted hereunder	Section II.1.(b) Complaint Response II.1.(f) Fugitive Dust, Track-Out, and Odor Bearing Contaminants	N/A	N/A
IA.13	Puget Sound Clean Air Agency Reg I: 9.10(a) <i>(State Only)</i>	06/09/88	Shall not emit HCl in excess of 100 ppm (dry) corrected to 7% O <sub>2</sub> for combustion sources	No monitoring required	At least three 1-hr runs	EPA Method 26A (See 40 CFR Part 60, Appendix A; July 1, 2001)

N/A = Not Applicable. A specific reference test method and/or emission standard period is not specified in the requirement. A test method is neither needed nor appropriate.

**B. EMISSION UNIT SPECIFIC APPLICABLE REQUIREMENTS**

The requirements in Section I. B. only apply to the specific emission units cited. In addition, the requirements in Section I.A. apply to the specific emission units cited below. If the monitoring and recordkeeping method for any requirement in Section I.A. is more extensive for specific emission units, the requirement was repeated in this section with the additional monitoring and recordkeeping requirements.

**1. Emission Unit #1 (EU-1): Spray Coating Operations - Siding Line and panel line**

**Table 2 Spray Coating Operation Requirements**

<b>Requirement No.</b>	<b>Enforceable Requirement</b>	<b>Adoption or Effective Date</b>	<b>Requirement Paraphrase (Information Only)</b>	<b>Monitoring &amp; Recordkeeping Method (See Section II)</b>	<b>Emission Standard Period (Info Only)</b>	<b>Emission Standard Reference Test Method</b>
EU-1.1	Puget Sound Clean Air Agency Reg I: 9.20(a)	6/09/88	Must maintain sources approved under Puget Sound Clean Air Agency Regulation I, Article 6 in good working order	Section II.1.(e) Maintenance and Repair of Insignificant Emission Units  Section II.4.(a) Operation and Maintenance (O&M) Plan Requirements.	N/A	N/A

Requirement No.	Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring & Recordkeeping Method (See Section II)	Emission Standard Period (Info Only)	Emission Standard Reference Test Method
EU-1.2	<p>Puget Sound Clean Air Agency Reg I 9.16 <i>This requirement will be superseded by the 7/12/01 version of Reg I: 9.16(c) upon adoption in the SIP</i></p> <p>Puget Sound Clean Air Agency Reg I: 9.16(c) <i>(State Only) This requirement will become federally enforceable upon adoption into the SIP and will replace the 6/13/91 version of Reg I: 9.16</i></p>	<p>6/13/91</p> <p>7/12/01</p>	<p>Shall use spray equipment to apply VOC-containing material unless operation is in an enclosed spray area that is registered with the Puget Sound Clean Air Agency, and incorporates dry filters or water wash curtains, and is vented to the atmosphere through a vertical stack</p>	<p>Work Practice Inspections Section II.1.(d)</p> <p>Spray Booths Section II.2.(e)(1)</p>	N/A	N/A
EU-1.3	40 CFR §63.802(a)(1)	12/07/95	<p>Achieve a weighted average Volatile Hazardous Air Pollutant (VHAP) content across all coatings of no greater than 1.0 lb VHAP/lb solids, as applied</p>	NESHAP Coating Compliance Plan II.2.(b)(i)	Monthly	<p>EPA Method 311, 40 CFR Part 63, Appendix A in conjunction with formulation data. For styrene and formaldehyde emissions, use EPA Method 24, 40 CFR Part 60, Appendix A (July 1, 1996)</p>

Requirement No.	Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring & Recordkeeping Method (See Section II)	Emission Standard Period (Info Only)	Emission Standard Reference Test Method
EU-1.4	40 CFR §63.802(a)(2)	12/07/95	Foam adhesives used in products that meet upholstered seating flammability requirements as specified in 40 CFR 63.802(a)(2)(i) shall contain no more than 1.8 lb VHAP/lb solids, as applied. All other contact adhesives (excluding aerosol adhesives and contact adhesives applied to nonporous substrates) shall contain no more than 1.0 lb VHAP/lb solid, as applied	NESHAP Strippable Spray Booth Coatings and Adhesives Compliance Plan (See II. 2.(b)(ii))	Not Applicable	EPA Method 311, 40 CFR Part 63, Appendix A, in conjunction with formulation data or EPA Method 24, 40 CFR Part 60, Appendix A (July 1, 1996)
EU-1.5	40 CFR §63.802(a)(3)	12/07/95	Strippable spray booth coatings shall contain no more than 0.8 lb VOC/lb solid, as applied	NESHAP Strippable Spray Booth Coatings and Adhesives Compliance Plan (See II.2.(b)(ii).)	Not Applicable	EPA Method 311, 40 CFR Part 63, Appendix A, in conjunction with formulation data or EPA Method 24, 40 CFR Part 60, Appendix A (July 1, 1996)



Requirement No.	Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring & Recordkeeping Method (See Section II)	Emission Standard Period (Info Only)	Emission Standard Reference Test Method
EU 2. 2.	<p>Puget Sound Clean Air Agency Reg I: 7.09(b) <i>This requirement will be superseded upon adoption of the 9/10/98 version of Reg I: 7.09(b) into the SIP</i></p> <p>Puget Sound Clean Air Agency Reg I: 7.09(b) (State Only) <i>This requirement shall become federally enforceable upon adoption into the SIP and will replace the 9/12/96 version of Reg I:7.09(b)</i></p>	<p>09/12/96</p> <p>09/10/98</p>	<p>Must develop and implement an O&amp;M Plan to assure continuous compliance with Puget Sound Clean Air Agency Regulations I, II, III</p>	<p>II.1.(e) Maintenance and Repair of Insignificant Emission Units</p> <p>II.4.(a) Operation and Maintenance (O&amp;M) Plan Requirements.</p>	<p>Not Applicable</p>	<p>Not Applicable</p>

**C. WORK PRACTICE STANDARDS FOR Wood Furniture NESHAP [40 CFR Part 63, Subpart JJ, 12/7/95]**

Professional Coatings Inc. shall prepare and maintain a written Work Practice Implementation Plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the required work practice standards in 40 CFR §63.803(b) through (l) as specified in the table below. In accordance with 40 CFR §63.803(a), the plan shall be made available to PSCAA, EPA or an authorized representative upon request, and Professional Coatings Inc. may be required to modify the plan if it does not adequately address all work practice standards or include sufficient mechanisms for ensuring work practice standards are being implemented.

**Table 4 Work Practice Standards for Wood Furniture**

Requirement No.	Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring & Recordkeeping Method (See Section II)	Emission Standard Period (Info Only)	Emission Standard Reference Test Method
WP 1. 1.	40 CFR §63.803(b)	12/07/95	Shall, train all new and existing employees, including contract employees, involved in VHAP emitting wood furniture manufacturing operation or in the implementation of this NESHAP. Required elements of training program in 40 CFR §63.803(b)	Section II. 2. A. (iv) Operator Training Logs	Not Applicable	Not Applicable
WP 1. 2.	40 CFR §63.803(c)	12/07/95	Shall, prepare and maintain a written leak inspection and maintenance plan for all equipment used to transfer or apply coatings, adhesives, or organic solvents. Required elements of plan in 40 CFR §63.803(c)	Section II. 2.A. (v) Leak Inspection Plan	Not Applicable	Not Applicable

Requirement No.	Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring & Recordkeeping Method (See Section II)	Emission Standard Period (Info Only)	Emission Standard Reference Test Method
WP 1. 3.	40 CFR §63.803(d)	12/07/95	Shall, develop an organic solvent accounting form to record quantity and type of organic solvent used each month, number of pieces washed off and reason for wash off, and quantity of spent organic solvent generated monthly	Cleaning and Washoff Accounting System (See II. 2. A. (vi))	Not Applicable	Not Applicable
WP 1. 4.	40 CFR §63.803(e)	12/07/95	It is unlawful to use cleaning or washoff solvents containing pollutants listed in Table 4 of NESHAP	Cleaning and Washoff Accounting System (See II. 2. A. (vi))	Not Applicable	Not Applicable
WP 1. 5.	40 CFR §63.803(f)	12/07/95	It shall be unlawful to use compounds containing more than 8.0% by weight of VOC for cleaning spray booth components.	Cleaning and Washoff Accounting System (See II. 2. A. (vi))	Not Applicable	Not Applicable
WP 1. 6.	40 CFR §63.803(g), (i), (j)	12/07/95	Must use closed containers for storing finishing, gluing, cleaning, and washoff materials, and for pumped or drained solvent used for line or spray gun cleaning	Closed Container Inspection Plan (See II. 2.A. vii)	Not Applicable	Not Applicable
WP 1. 7.	40 CFR §63.803(h)	12/07/95	It shall be, unlawful to use conventional air spray guns to apply finishing materials except under conditions specified in 40 CFR §63.803(h)	Spray Coating Application Equipment Inspection Plan (See II. 2.A. viii)	Not Applicable	Not Applicable

Requirement No.	Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring & Recordkeeping Method (See Section II)	Emission Standard Period (Info Only)	Emission Standard Reference Test Method
WP 1. 8.	40 CFR §63.803(k)	12/07/95	Must control emissions from washoff operations by minimizing dripping and using closed tanks for washoff	Closed Container Inspection Plan (See II. 2.A. vii)	Not Applicable	Not Applicable
WP 1. 9.	40 CFR §63.803(l)	12/07/95	Prepare and maintain a Formulation Assessment Plan for finishing operations which identifies volatile HAPs listed in Table 5 of the NESHAP, determines baseline levels and tracks usage as specified in 40 CFR Section §63.803(l). If, after November 1998, annual usage of VHAP exceeds baseline level, provide written notification to PSCAA, EPA or authorized representative describing the amount of increase and reasons for exceedance of baseline.	Formulation Assessment Plan (See II. 2.A. ix)	Not Applicable	Not Applicable

## II. MONITORING AND RECORDKEEPING METHODS DESCRIPTION

Professional Coatings Inc. must follow the applicable requirements listed below when referenced by an applicable requirement in Section I.A or I.B of this permit.

### 1. Facility-Wide Monitoring

#### *(a) Opacity Monitoring*

Professional Coatings Inc. shall conduct visible emission inspections of the facility at least once per week except as provided under Section I.P Data recovery of this permit. Inspections are to be performed while the facility is in operation during daylight hours. If during a weekly visible emissions inspection, or any other time, visible emissions other than uncombined water are observed from a single unit or activity, Professional Coatings Inc. shall, as soon as practical, but no later than 24 hours of the initial observation, take corrective action until there are no visible emissions; or, alternatively, record the opacity using the reference test method, or shut down the unit or activity until it can be repaired. Failure to take corrective action as described above shall be reported under Section V.Q.1(b) Deviation Reports of this permit.

[WAC 173-401-615(1)(b), 9/15/01]

#### *(b) Complaint Response*

Professional Coatings Inc. shall record and commence an investigation of air pollution complaints as soon as practicable, but no later than three days after receipt by Professional Coatings Inc. Professional Coatings Inc. shall identify complaints regarding these emissions as follows:

- Any emissions that are, or likely to be, injurious to human health, plant or animal life, or property, or which unreasonably interfere with enjoyment of life and property; or
- Any fugitive dust emissions, or
- Any track-out onto paved roads open to the public, or
- Any emissions of odor-bearing air contaminants, or
- Complaints regarding other applicable requirements.

Professional Coatings Inc. shall investigate the complaint and determine if there was noncompliance with an applicable requirement of this permit. If it is determined to be noncompliance, Professional Coatings Inc. shall as soon as practicable but no later than within 24 hours of determination of noncompliance, either correct the problem or shut down the noncompliant operation until it is repaired or corrected. Failure to investigate the complaint as described above, or alternatively, not correcting the problem or shutting down the unit or activity within 24 hours is a deviation of this permit and must be reported under Section V.Q.1(b) Deviation Reports of this permit.

[WAC 173-401-615(1)(b), 09/15/01]

**(c) Facility Inspections**

Professional Coatings Inc. shall conduct a facility inspection at least once per week. These inspections shall include checking for prohibited activities under Section III of the permit and activities that require additional approval under Section IV of the permit. The inspections shall also examine the general state of compliance with the facility-wide applicable requirements and the general effectiveness of the Operation & Maintenance (O&M) Plan.

Professional Coatings Inc. shall correct any potential compliance problems with significant emission units or activities identified by these weekly inspections, or any other time, as soon as practicable but no later than 24 hours after identification or, alternatively, shut down the unit or activity within 24 hours until the problem can be corrected. If Professional Coatings Inc. does not take the appropriate action as described above, Professional Coatings Inc. must report the deviation under Section V.Q.1(b) Deviation Reports of this permit. Professional Coatings Inc. shall also promptly repair defective insignificant emission units.

[WAC 173-401-615(1)(b), 09/15/01]

**(d) Work Practice Inspection**

Professional Coatings Inc. shall conduct inspections of work practice activities that are applicable requirements at least once per week. In addition, work practices shall be randomly sampled during the facility-wide inspection and observed for consistency with permit requirements. Professional Coatings Inc. shall correct any potential compliance problems identified by these weekly inspections, or any other time, as soon as practicable but within 24 hours of identification or, alternatively, shut down the unit or activity to which the work practice applies until the problem can be corrected. [WAC 173-401-615(1)(b), 09/15/01]

**(e) Maintenance and Repair of Insignificant Emission Units**

Professional Coatings Inc. shall use good industrial practices to maintain insignificant emission units and equipment not listed in this permit. Professional Coatings Inc. shall conduct quarterly inspections. For such equipment, Professional Coatings Inc. shall also promptly repair defective equipment. Good industrial practices may include, but are not limited to, following

the manufacturer's operations manual or an equipment operations schedule, minimizing emissions until the repairs can be completed, and taking measures to prevent recurrence of the problem.

[WAC 173-401-530(2)(a), 06/17/1994] [Puget Sound Clean Air Agency, Regulation I, Section 9.20 (b), 06/19/1988]

**(f) Fugitive Dust, Track-Out, and Odor Bearing Contaminants**

Professional Coatings Inc. shall conduct inspections of the facility for odor bearing contaminants and emissions of any air contaminant in sufficient quantities and of such characteristics and duration as is, or is likely to be, injurious to human health, plant or animal life, or property, or which unreasonably interfere with enjoyment of life and property at least once per calendar quarter. Professional Coatings Inc. shall also conduct inspections to monitor for fugitive dust and track-out from the facility at least once per week. If a deviation from the applicable requirements identified in this permit is observed during a quarterly inspection, or any other time, Professional Coatings Inc. shall implement corrective actions to eliminate the deviation promptly, but no later than within 24 hours of identification, or alternatively, shut down the unit or activity within 24 hours at which the deviation occurs until the deviation can be corrected. [WAC 173-401-615(1)(b), 09/15/01]

**2. Specific Monitoring**

In this section, if any equipment is not in use during the specified monitoring period, then no monitoring is required for that time period and the absence of monitoring is not a permit deviation.

**a) VOC Content Monitoring and Recordkeeping Procedure**

Professional Coatings Inc. shall maintain manufacturer's Materials Safety Data Sheets (MSDS), or other manufacturer-supplied data on the VOC content of coating used at the facility. Professional Coatings Inc. shall update this list at least annually. Professional Coatings Inc. shall make this information available to the Puget Sound Clean Air Agency upon request. [WAC 173-401-615(1)(b), 09/15/01]

- i. **NESHAP Coating Compliance Plan.** Professional Coatings Inc. shall maintain a certified product data sheet for each finishing material and thinner. Professional Coatings Inc.'s O&M Plan shall include procedures for calculating the average Volatile Hazardous Air Pollutant (VHAP) content for all coating and solvent used at the facility on a monthly basis, and the average VHAP content shall be limited to less than 1.0 lb VHAP/lb solid as applied. The monthly average concentration shall be calculated from all material used in that month by the following equation:

$$C_{ave} = \frac{V_{total} \div S_{total}}{= (Total\ VHAP\ weight\ for\ month\ applied) \div (Total\ solid\ weight\ for\ month\ applied)}$$

$$= \frac{(V_1 + V_2 \dots + V_n) \div (S_1 + S_2 \dots + S_n)}$$

- Where
- $C_{ave}$  = Average VHAP concentration
  - $V_i$  = VHAP weight of each material i applied
  - = Density (lbs/gallon) x  $\frac{Weight\ Percent\ VHAP}{100}$  x Gallons
  - $S_i$  = Weight of solid of each material i applied
  - = Density (lbs/gallon) x  $\frac{Weight\ Percent\ Solids}{100}$  x Gallons
  - n = the number of coating and solvents used at the facility

Professional Coatings Inc. shall maintain copies of the averaging calculations for each month, as well as the data used to support the calculation of  $C_{ave}$ . Professional Coatings Inc. shall submit the results of the averaging calculation for each month with its semiannual compliance demonstration report required in Section V. Q. [40 CFR 63.804 (1)]

- ii. **NESHAP Strippable Spray Booth Coatings and Contact Adhesive Compliance Plan.** Professional Coatings Inc. shall maintain certified product data sheets (CPDS) or material safety data sheets (MSDS) for each strippable spray booth coating and contact adhesive (except aerosol adhesives and contact adhesives applied to nonporous substrates). Professional Coatings Inc.'s O&M Plan shall include instructions to evaluate the CPDS or MSDS upon purchase or delivery of the product to verify that the VOC content is less than 0.8 lb VOC/lb solids for strippable spray booth coatings and less than 1.8 lb VHAP/lb solid or 1.0 lb VHAP/lb solid, whichever limit is applicable, for adhesive coatings. [40 CFR 63.802 (a)(2) and (3)]
- iii. **Brush Cleaner Opacity Monitoring Plan.** Professional Coatings Inc.'s O&M Plan shall include procedures for performing weekly inspections (during times of operation) that include the following:
  - a) Visual inspection of bags in dust collector to assure no holes or other defects,
  - b) Visual inspection of ductwork to assure there are no visible emissions from points other than the stack, and
  - c) Visual inspection of area surrounding the bag-type dust collector to assure particulate matter is collected in a dust-free manner (i.e. no dust accumulation, spills).

If problems are noted during such inspections, Professional Coatings Inc. shall perform a more detailed examination of the equipment, and Professional Coatings Inc. shall correct problems identified by these inspections within 24 hours of initial record. For each weekly inspection, Professional Coatings Inc. shall maintain records in accordance with Sections II. C. and V. O. of this

permit. (also see Section II.2.(e)(2)- Baghouse Monitoring Plan)

- iv. **Operator Training Logs.** Professional Coatings Inc.'s O&M Plan shall include records demonstrating that Professional Coatings Inc. has an operator training program, including a list of all current personnel by name and job description, an outline of the subjects covered in training, lesson plans for courses, and a description of methods used to demonstrate and document successful completion of training. Professional Coatings Inc. shall train existing employees within 6 months of the required compliance date, and provide refresher training for all employees annually. New employees shall be trained within 1 month of initial hire. [40 CFR 63.803(b)]
  
- v. **Leak Inspection Plan.** Professional Coatings Inc.'s O&M Plan shall include procedures for performing monthly visual inspections of all equipment used to transfer or apply coatings, adhesives, or organic solvents to determine if leaking is occurring. Professional Coatings Inc. shall include in its O&M Plan, an inspection schedule, methods for documenting inspections, and the time frame between identifying the leak and making the repair. If leaks are detected, the first attempt to repair the leak shall be no later than 5 days after detection. The final repairs shall be made within 15 calendar days after the leak is detected, unless leaking equipment is to be replaced, in which case repairs shall be completed within 3 months. The O&M Plan shall include records collected in accordance with the leak inspection and maintenance plan, and Section II. C. and V. O of this permit.(40 CFR 63.803(c)]
  
- vi. **Cleaning and Washoff Accounting System.** Professional Coatings Inc.'s O&M Plan shall include a form which records the quantity and type of organic HAP solvent used each month for washoff and cleaning, the number of pieces washed off, including the reason for washoff, and the quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite. Professional Coatings Inc. shall implement the use of this form to maintain records associated with the cleaning and solvent accounting system.

Professional Coatings Inc. shall maintain Material Safety Data Sheets (MSDS) onsite for all cleaning and washoff solvents, including compounds used to clean spray booth components. Professional Coatings Inc. shall review the MSDS at the time of product purchase or delivery to assure cleaning and washoff solvents do not contain pollutants listed in Table 4 of the Wood Furniture NESHAP and to assure solvents used in spray booth cleaning do not exceed 8.0% by weight of VOC. Professional Coatings Inc. shall limit the solvent used for preparing a booth's surface area for coating/protection application to 1.0 gallon per booth. [40 CFR 63.803(d) and (e)]

- vii. **Closed Container Inspection Plan.** Professional Coatings Inc.'s O&M Plan shall include procedures for performing weekly visual inspections of the facility (during times of operation) to determine if normally closed containers are used for storing finishing, gluing, cleaning, and washoff materials, for pumped or drained organic solvent used for line cleaning, for all organic solvent used to clean spray guns, and for all washoff operations (except during the washoff process). If open containers are noted during the weekly inspection, Professional Coatings Inc. shall take corrective action within 1 hour to assure all containers are closed. Records shall be maintained in accordance with Sections II. C. and V. O. of this permit. [40 CFR 63.803(g)]
- viii. **Spray Coating Application Equipment Inspection Plan.** Professional Coatings Inc.'s O&M Plan shall include criteria for when conventional air spray guns can be used. This criteria includes applying finishing material that has a VOC content no greater than 1.0 lb VOC/lb solids (as applied), touchup and repair operations, automated spray operations, or when total usage of the finishing material applied is no more than 5% of the total gallons of finishing material used in the semiannual period. Professional Coatings Inc. shall maintain records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing material applied with conventional spray guns for each semiannual period. [40 CFR 63.803(h)(3-6)]
- ix. **Formulation Assessment Plan.** Professional Coatings Inc.'s O&M Plan shall include procedures for collecting and maintaining records that identify VHAP from the list in Table 5 of the Wood Furniture NESHAP that are being used in finishing operations at the facility. Professional Coatings Inc. shall maintain documentation of determination of a baseline level of usage based on the highest annual usage in 1994, 1995 or 1996. Professional Coatings Inc. shall track annual usage of all VHAP emissions and report annual emissions to PSCAA in accordance with Section V. R of this permit. Professional Coatings Inc.'s O&M Plan shall include procedures for, notifying PSCAA in writing if baseline levels in the Formulation Assessment Plan are exceeded in accordance with 40 CFR Section §63.803(l).

### **3. Spray Booths**

Professional Coatings Inc. shall check the primary dry filter systems, where visible, for proper seating and complete coverage over the exhaust plenum. The inspection shall be conducted at least daily or at time of use if booth is used less frequently than once per month, except as provided under Section I.P Data recovery of this permit. Professional Coatings Inc. shall, as soon as practicable but within 24 hours of the initial observation either; correct filter or, alternatively, shut down the unit or activity until it can be repaired. Failure to take corrective action as described above or not shutting down the unit or activity within 24 hours until necessary repair is completed is a deviation of this permit and must be reported under Section V.Q.1(b) Deviation

Reports of this permit. [WAC 173-401-615(1)(b), 09/15/01]

- Check for evidence of fugitive dust or fallout from the equipment or the exhaust stack. If the fugitive dust or fallout from the equipment or the exhaust stack is observed, Professional Coatings Inc. shall, correct the problem as soon as practicable but no later than within 24 hours of determination or shut down the operation until it is repaired or corrected. Failure to take corrective action as described above or not shutting down the unit or activity within 24 hours is a deviation of this permit and must be reported under Section V.Q.1(b) Deviation Reports of this permit.
- Where required by an Order of Approval condition, a pressure drop gauge shall be installed to measure the pressure drop across the booth's exhaust filters. The acceptable pressure drop range shall be marked on or nearby the gauge, or on a pressure drop log. A record that the pressure drop was in the acceptable range shall be made according to the frequency specified in the Order of Approval condition or at least once per month if not specified in the Order of Approval. If the pressure drop is not within the acceptable range, Professional Coatings Inc. shall, as soon as practicable but within 24 hours of the initial observation either; correct the pressure drop or alternatively, shut down the unit or activity within 24 hours until necessary repair is completed until it can be repaired. Failure to take corrective action as described above or not shutting down the unit or activity within 24 hours is a deviation of this permit and must be reported under Section V.Q.1(b) Deviation Reports of this permit.

If a pressure differential gauge is required by an Order of Approval condition, then the range shall be established using the manufacturer's recommendations or the low end of the range will be no less than 50 percent of the pressure differential when operating with a clean filter or cyclone and the high end shall be a value based on the operational experience and will be a value below that at which the filters would reasonably be expected to fail.

[WAC 173-401-615(1)(b), 09/15/01]

#### **4. Baghouse Monitoring Plan**

**Operator Inspection:** Professional Coatings Inc. shall perform weekly inspections that include the following (on weeks when the process is not in operation, operators shall mark as such in operator logs):

- 1) For all control devices required to be equipped with a differential pressure gauge: check differential pressure across the baghouse to assure operation within acceptable range in accordance with the baghouse manufacturer's recommendations. Professional Coatings Inc. shall mark the acceptable range on or near the gauge and record it in the O&M Plan;
- 2) Visually inspect the exhaust stack from the cyclone or baghouse to assure there are no visible emissions from the stack while the equipment is operating.
- 3) Visually inspect ductwork around the control unit to assure there are no visible emissions

from points other than the stack; and

- 4) Visually inspect the dust hopper area surrounding the baghouse or cyclone to assure particulate matter is collected, and that the particulate matter is removed properly (i.e., no air in-leakage through rotary valves, dust accumulation, spills, etc.).

Professional Coatings Inc. shall perform quarterly visual inspections of fans to assure proper fan operation.

If problems are noted during weekly or weekly inspections (i.e., pressure drop outside acceptable range, visible emissions or dust accumulation, inoperative fan), Professional Coatings Inc. shall perform a more detailed examination of the equipment, and Professional Coatings Inc. shall correct problems identified by these inspections within 24 hours of initial observation or shut down the emission unit until the equipment is repaired.

[WAC 173-401-615(1)(b), 9/15/01]

### ***B. Operation and Maintenance (O&M) Plan Requirements.***

Professional Coating Inc's O&M Plan shall include equipment operation and maintenance procedures specifying how Professional Coatings Inc. will assure continuous compliance with Puget Sound Clean Air Agency Regulations I, II and III. For insignificant emission units, refer to the requirements stated in Section II.1(e) Maintenance and Repair of Insignificant Emission Units of this permit. The plan shall reflect good industrial practice. In most instances, following the manufacturer's operations manual or equipment operational schedule, minimizing emissions until the repairs can be completed and taking measures to prevent recurrence of the problem may be considered good industrial practice. Determination of whether good industrial practice is being used will be based on available information such as monitoring results, opacity observations, review of operations and maintenance procedures, and checks of the emission unit or equipment. The specific provisions of the O&M Plan, other than those required by Condition Section II.1, II.2, II.3, and II.4 shall not be deemed part of this permit. [Puget Sound Clean Air Agency Regulation I, Section 7.09(b), 9/10/98]

## **III. PROHIBITED ACTIVITIES**

Professional Coatings Inc. is prohibited from conducting, causing, or allowing the following activities:

### ***A. Adjustment for Atmospheric Conditions***

Varying the rate of emissions of a pollutant according to atmospheric conditions or ambient concentrations of that pollutant is prohibited, except as directed according to air pollution episode regulations. [WAC 173-400-205, 3/22/91 ]

### **B. Open Burning**

Professional Coatings Inc. shall not conduct open burning during any stage of an air pollution episode or period of impaired air quality and shall not conduct any open burning other than the following types:

1. Fires consisting solely of charcoal, propane, natural gas, or wood used solely for the preparation of food that comply with WAC 173-425-020(1) and WAC 173-425-030(21) and
2. Fires for instruction in the methods of fighting fires, provided that the person conducting the training fire complies with Puget Sound Clean Air Agency Regulation I, Section 8.07.

[Puget Sound Clean Air Agency Regulation I, Sections 8.04(a), 11/09/2000 and 8.07, 9/09/1999] [WAC 173-425-020(1), 3/13/2000; WAC 173-425-030(21), 3/13/2000; RCW 70.94.743, 1998 c68 p1 and RCW 70.94.775(2), 1995 c362 p2 State/Puget Sound Clean Air Agency only]

### **C. Refuse Burning**

Professional Coatings Inc. shall not cause or allow the burning of combustible refuse except in a multiple chamber incinerator provided with control equipment. Professional Coatings Inc. shall not operate refuse burning equipment any time other than daylight hours. [Puget Sound Clean Air Agency Regulation I, Section 9.05, 12/9/93]

### **D. Concealment**

#### **1. General**

Professional Coatings Inc. shall not cause or allow the installation or use of any device or use of any means which, without resulting in a reduction in the total amount of air contaminant emitted, conceals an emission of an air contaminant which would otherwise violate Puget Sound Clean Air Agency Regulation I, Article 9 or Chapter 173-400 WAC. [Puget Sound Clean Air Agency Regulation I, Section 9.13(a), 6/9/88 and WAC 173-400-040(7), 8/20/93] [WAC 173-400-040(7), 12/23/00 state only]

#### **2. NSPS**

Professional Coatings Inc. shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable (40 CFR Part 60) standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. [40 CFR 60.12, 3/8/74]

### ***E. Masking***

Professional Coatings Inc. shall not cause or allow the installation or use of any device or use of any means designed to mask the emission of an air contaminant that causes detriment to health, safety or welfare of any person or conceals or masks an emission of an air contaminant that would otherwise violate Regulation I, Article 9 or Chapter 173-400 WAC. [Puget Sound Clean Air Agency Regulation I, Section 9.13(b) and WAC 173-400-040(7), 8/20/93] [WAC 173-400-040(7), 12/23/00 state only]

### ***F. Ambient Standards***

Professional Coatings Inc. shall not cause or allow the emission of air contaminants in sufficient quantity as to exceed any ambient air quality standard in Puget Sound Clean Air Agency Regulation I, Section 11.01. [Puget Sound Clean Air Agency Regulation I, Section 11.01(b), 4/14/94]

## **IV. ACTIVITIES REQUIRING ADDITIONAL APPROVAL**

Professional Coatings Inc. shall file notification and obtain the necessary approval from the Puget Sound Clean Air Agency before conducting any of the following:

### ***A. New Source Review***

Professional Coatings Inc. shall not construct, install, establish, or modify an air contaminant source, except those sources that are excluded by Puget Sound Clean Air Agency Regulation I, Section 6.03(b), unless a “Notice of Construction and Application for Approval” has been filed with and approved by the Puget Sound Clean Air Agency. For purposes of complying with the recordkeeping requirement in Puget Sound Clean Air Agency Regulation I, 6.03(c), Professional Coatings Inc. shall provide in a timely manner, upon request by the Agency, any information reasonably necessary to document the exemption. [Puget Sound Clean Air Agency Regulation I, Section 6.03, 7/8/99; 40 CFR 60.7, 2/12/99; 40 CFR 60.14, 12/17/00; 40 CFR 60.15, 12/16/75; 40 CFR 63.5, 3/16/94] [Puget Sound Clean Air Agency Regulation I, Section 6.03, 7/12/01, WAC 173-460-040, 10/23/98; RCW 70.94.152, 1996 c 67p1, 1996 c 29p1 State/Puget Sound Clean Air Agency only]

### ***B. Replacement or Substantial Alteration of Emission Control Technology***

Professional Coatings Inc. shall file a Notice of Construction and Application for Approval according to WAC 173-400-114 with the Puget Sound Clean Air Agency before replacing or substantially altering any emission control technology installed at the facility. [Puget Sound Clean Air Agency Regulation I, Section 6.03, 7/8/99] [WAC 173-400-114, 9/20/93; RCW 70.94.153, 1991 c 199p303 State/Puget Sound Clean Air Agency only]

### **C. Asbestos**

- 1) Professional Coatings Inc. shall comply with 40 CFR 61.145 and 61.150 when conducting renovation or demolition activities at the facility. [40 CFR 61.145 and 61.150]
- 2) Professional Coatings Inc. shall comply with Puget Sound Clean Air Agency Regulation III, Article 4 when conducting any asbestos project, renovation or demolition activities at the facility. [Puget Sound Clean Air Agency Regulation III, Article 4, 7/13/00]

### **D. Spray Coating**

- 1) **Applicability.** This section applies to spray-coating operations where a coating that protects or beautifies a surface is applied with spray-coating equipment.
- 2) **Exemptions.** The following activities are exempt from the provisions of Sections 9.16(c) and (d) of this regulation. Persons claiming any of the following spray-coating exemptions shall have the burden of demonstrating compliance with the claimed exemption.
  - (a) Application of architectural or maintenance coatings to stationary structures (e.g., bridges, water towers, buildings, stationary machinery, or similar structures);
  - (b) Aerospace coating operations subject to 40 CFR Part 63, Subpart GG. This includes all activities and materials listed in 40 CFR 63.741(f);
  - (c) Use of high-volume, low-pressure (HVLP) spray guns when:
    - (i) spray-coating operations do not involve motor vehicles or motor vehicle components;
    - (ii) the gun cup capacity is 8 fluid ounces or less;
    - (iii) the spray gun is used to spray-coat less than 9 square feet per day per facility;
    - (iv) coatings are purchased in containers of 1 quart or less; and
    - (v) spray-coating is allowed by fire department, fire marshal, or other government agency requirements.
  - (d) Use of air-brush spray equipment with 0.5 to 2.0 CFM airflow and a maximum cup capacity of 2 fluid ounces;
  - (e) Use of hand-held aerosol spray cans with a capacity of 1 quart or less; or
  - (f) Indoor application of automotive undercoating materials using organic solvents having a flash point in excess of 100°F.
- 3) **General Requirements for Indoor Spray-Coating Operations.** It shall be unlawful for any person subject to the provisions of this section to cause or allow spray-coating inside a structure, or spray-coating of any motor vehicles or motor vehicle components, unless the spray-coating is conducted inside an enclosed spray area. The enclosed spray area shall employ either properly seated paint arresters, or water-wash curtains with a continuous water curtain to control the overspray. All

emissions from the spray-coating operation shall be vented to the atmosphere through an unobstructed vertical exhaust vent.

- 4) **General Requirements for Outdoor Spray-Coating Operations.** It shall be unlawful for any person subject to the provisions of this section to cause or allow spray-coating outside an enclosed structure unless reasonable precautions are employed to minimize the overspray. Reasonable precautions include, but are not limited to the use of:
  - (i) Enclosures and curtailment during high winds; and
  - (ii) High-volume low-pressure (HVLP), low-volume low-pressure (LVLP), electrostatic, or air-assisted airless spray equipment. Airless spray equipment may be used where low viscosity and high solid coatings preclude the use of higher-transfer efficiency spray equipment.
- 5) **Compliance with Other Regulations.** Compliance with this regulation does not exempt any person from compliance with Regulation I, Section 9.11 and all other applicable regulations including those of other agencies.

[Puget Sound Clean Air Agency Regulation I, Section 9.16, 7/12/01 State/Puget Sound Clean Air Agency only. This requirement will become federally enforceable upon adoption into the SIP and will replace the 6/13/91 version of Reg I: 9.16]

## **V. STANDARD TERMS AND CONDITIONS**

### ***A. Duty to comply***

Professional Coatings Inc. shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation of Chapter 70.94 RCW and, for federally enforceable provisions, a violation of the Federal Clean Air Act (FCAA). Such violations are grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [Puget Sound Clean Air Agency Regulation I, Section 7.05, 10/28/93; WAC 173-401-620(2)(a), 11/4/93]

### ***B. Permit actions***

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by Professional Coatings Inc. for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [WAC 173-401-620(2)(c), 11/4/93]

### ***C. Property rights***

This permit does not convey any property rights of any sort, or any exclusive privilege. [WAC 173-401-620(2)(d), 11/4/93]

**D. Duty to provide information**

Professional Coatings Inc. shall furnish to the Puget Sound Clean Air Agency, within a reasonable time, any information that the Puget Sound Clean Air Agency may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, Professional Coatings Inc. shall also furnish to the Puget Sound Clean Air Agency copies of records required to be kept by the permit or, for information claimed to be confidential, Professional Coatings Inc. may furnish such records directly to EPA Region 10 along with a claim of confidentiality. The Puget Sound Clean Air Agency shall maintain the confidentiality of such information in accordance with RCW 70.94.205. [WAC 173-401-620(2)(e), 11/4/93]

**E. Permit fees**

Professional Coatings Inc. shall pay fees as a condition of this permit in accordance with Puget Sound Clean Air Agency Regulation I, Article 7. Failure to pay fees in a timely fashion shall subject Professional Coatings Inc. to civil and criminal penalties as prescribed in Chapter 70.94 RCW. [WAC 173-401-620(2)(f), 11/4/93; RCW 70.94.162, 1998 c 245p129]

**F. Emissions trading**

No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit. [WAC 173-401-620(2)(g), 11/4/93]

**G. Severability**

If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable. [WAC 173-401-620(2)(h), 11/4/93; RCW 70.94.905, 1991 c 199p719 State and Puget Sound Clean Air Agency only]

**H. Permit appeals**

This permit or any condition in it may be appealed only by filing an appeal with the Pollution Control Hearings Board and serving it on the Puget Sound Clean Air Agency within thirty days of receipt, pursuant to RCW 43.21B.310 and WAC 173-401-735. The provision for appeal in this section is separate from and additional to any federal rights to petition and review found under 40 CFR 505(b) of the FCAA. [WAC 173-401-620(2)(i) and WAC 173-401-735, 11/4/93; RCW 70.94.221, 1970 ex.s.c 62p58]

**I. Permit continuation**

This permit and all terms and conditions contained therein, including any permit shield provided under WAC 173-401-640, shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted under WAC 173-401-705(2) shall remain in effect until the renewal permit has been issued or denied if a timely and complete permit application has been submitted. [WAC 173-401-620(2)(j), 11/4/93]

**J. Federal enforceability**

All terms and conditions of this permit are enforceable by the EPA administrator and by citizens under the FCAA, except for those terms and conditions designated in the permit as not federally enforceable (i.e. “state only” or “State/Puget Sound Clean Air Agency only.” [WAC 173-401-625, 11/4/93]

**K. Inspection and entry**

Upon presentation of credentials and other documents as may be required by law, Professional Coatings Inc. shall allow the Puget Sound Clean Air Agency or an authorized representative to:

- 1) Enter Professional Coating Inc’s premises or where records must be kept under the conditions of this permit;
- 2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- 3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices or operations regulated or required under the permit; and
- 4) As authorized by WAC 173-400-105 and the FCAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [WAC 173-401-630(2), 11/4/93] [RCW 70.94.200, 11/12/97 State/Puget Sound Clean Air Agency only]

**L. Compliance requirements**

Professional Coatings Inc. shall continue to comply with all applicable requirements with which the source is currently in compliance. Professional Coatings Inc. shall meet on a timely basis any applicable requirements that become effective during the permit term. [WAC 173-401-630(3), 11/4/93; WAC 173-401-510(2)(h)(iii), 11/4/93]

**M. Compliance certifications**

Professional Coatings Inc. shall submit a certification of compliance with permit terms and conditions once per year. The first such certification shall cover the period from permit issuance to May 30, 2003. Each certification shall include:

- 1) The identification of each term or condition of the permit that is the basis of the certification;
- 2) The compliance status;
- 3) Whether compliance was continuous or intermittent; and

- 4) The method(s) used for determining the compliance status of the source, currently and over the reporting period. These methods must be consistent with the permit Monitoring, Maintenance and Recordkeeping Methods.

All compliance certifications shall be submitted to EPA Region 10 and to the Puget Sound Clean Air Agency, at the following addresses, within 30 days after the close of the period covered by the certification [WAC 173-401-630(5), 11/4/93]:

Puget Sound Clean Air Agency	EPA Region 10, Mail Stop OAQ-107
Attn.: Operating Permit Certification	Attn.: Air Operating Permits
110 Union Street, Suite 500	1200 Sixth Avenue
Seattle, Washington 98101	Seattle, Washington 98101

## **N. Compliance determination**

### **1. Emission Testing - General**

- i) For the purpose of determining compliance with an emission standard, the Puget Sound Clean Air Agency or Ecology may conduct testing of an emission unit or require Professional Coatings Inc. to have it tested. In the event the Puget Sound Clean Air Agency or Ecology conduct the test, Professional Coatings Inc. shall be given an opportunity to observe the sampling and to obtain a sample at the same time. [Puget Sound Clean Air Agency Regulation I, Section 3.05(b), 2/10/94; WAC 173-400-105(4), 8/20/93, 10/23/98 State/Puget Sound Clean Air Agency Only]
- ii) Testing of sources for compliance with emissions standards shall be performed in accordance with the Reference Test Methods identified in Section I of this permit, except where this permit indicates that a specific Reference Test Method is not needed or appropriate.
- iii) Professional Coatings Inc. shall notify the Puget Sound Clean Air Agency in writing at least 2 weeks (14 days) prior to any compliance test and provide the Puget Sound Clean Air Agency an opportunity to review the test plan and to observe the test.
- iv) Professional Coating Inc, if required by the Puget Sound Clean Air Agency to perform a compliance test, shall submit a report to the Puget Sound Clean Air Agency no later than 60 days after the test. The report shall include:
  - (a) A description of the source and the sampling location;
  - (b) The time and date of the test;
  - (c) A summary of results, reported in units and for averaging periods consistent with the applicable emission standard;
  - (d) A description of the test methods and quality assurance procedures employed;

- (e) The amount of fuel burned or raw material processed by the source during the test;
- (f) The operating parameters of the source and control equipment during the test;
- (g) Field data and example calculations; and
- (h) A statement signed by the senior management official of the testing firm certifying the validity of the source test report.

[WAC 173-400-105(4), 10/14/96 State/Puget Sound Clean Air Agency Only; Puget Sound Clean Air Agency Regulation I, Section 3.05(b), 2/10/94; and Puget Sound Clean Air Agency Regulation I, Section 3.07, 2/9/95]

## **2. Credible Evidence**

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. [Puget Sound Clean Air Agency Regulation I, Section 3.06, 10/8/98; 40 CFR 60.11(g), 2/24/97]

## **O. Recordkeeping**

### **1. General**

Professional Coatings Inc. shall maintain the following, where applicable:

- 1) Records of required monitoring information that include the following:
  - a) The date, place as defined in the permit, and time of sampling or measurements;
  - b) The date(s) analyses were performed;
  - c) The company or entity that performed the analyses;
  - d) The analytical techniques or methods used;
  - e) The results of such analyses; and
  - f) The operating conditions existing at the time of sampling or measurement. [WAC 173-401-615(2), 09/15/01]
- 2) Records describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. [WAC 173-401-615(2), 09/15/01]
- 3) Records of all monitoring data and support information required by this permit shall be retained by Professional Coatings Inc. for a period of five years from the date of the monitoring, sample, measurement, record or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous

monitoring instrumentation, and copies of all reports required by the permit. [WAC 173-401-615(2), 09/15/01]

- 4) Professional Coatings Inc. shall keep records of all inspections, tests and other actions required by Section II.1 of this permit, including who conducted the inspection, tests or other actions; and the date and the results of the inspection, tests or other actions including corrective actions. Professional Coatings Inc. shall also maintain records of all inspections, tests, and other actions required by the O&M Plan and Section II.2 of this permit. All records required under this item will be available for Puget Sound Clean Air Agency review. [Puget Sound Clean Air Agency Regulation I, Section 7.09(b), 9/10/98]
- 5) Professional Coatings Inc. shall keep records for all complaints received concerning odor, fugitive emissions or nuisance relating to Section II of this permit. These records must also contain the following information:
  - a) The date and time of the complaint,
  - b) The name of the person complaining, if known,
  - c) The nature of the complaint, and
  - d) The date, time and nature of any corrective action taken.

[WAC 173-401-615(2)(b), 09/15/01]

**P. Data recovery**

If the specific monitoring and recordkeeping requirements in Section II of this permit are silent on data recovery provisions, data recovery is assumed to be 100%. However, for Sections II.3 (Spray Booths) and II.4 (Baghouse Monitoring Plan) of this permit, the following monitoring and recordkeeping requirements apply:

- (1) Professional Coatings Inc. shall collect at least the following amount of valid data:
  - (a) For records or monitoring data that are required daily or more frequently, Professional Coatings Inc. shall collect at least 90% of all records or data required in a month.
  - (b) For records or monitoring data that are required weekly or monthly (yet less frequently than daily), Professional Coatings Inc. shall collect at least nine of the most recent ten required records.
- (2) Professional Coatings Inc. is not required to monitor during any period that the monitored process does not operate, nor during periods of monitoring system breakdown, malfunction, repairs, calibration checks and acts of God deemed to be unavoidable. In determining whether a monitoring failure was unavoidable, the following factors shall be considered:

- (a) Whether the event was caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition;
  - (b) Whether the event was of a recurring pattern indicative of inadequate design, operation, or maintenance; and
  - (c) Whether Professional Coatings Inc. took immediate and appropriate corrective action in a manner consistent with good air pollution control practice.
- (3) The occasional and unintentional loss or omission of required records shall not constitute a reportable permit deviation, provided Professional Coating Inc, upon discovery of the missing records, is able to reconstruct the required information from other available information or knowledge or the missing record is otherwise allowed by this permit. Upon request, Professional Coatings Inc. will disclose data or information used to reconstruct records to the Puget Sound Clean Air Agency.

The monitoring reports required by Section V.Q. shall include an explanation for any instance in which Professional Coatings Inc. failed to meet the data recovery requirements of this condition for any monitored process or parameter. The explanation shall include the reason that the data was not collected and any actions that Professional Coatings Inc. will take to insure collection of such data in the future.

[WAC 173-401-615(1)(b), 09/15/01]

**Q. Reporting**

**1. General Reports**

**(a) Semiannual Operating Permit Reports**

Any monitoring reports required by this permit to be submitted to the Puget Sound Clean Air Agency shall be submitted at least once every six months (June 30 and December 30), or more frequently where required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. If there were no deviations Professional Coatings Inc. must submit a report stating that, there were no deviations. [WAC 173-401-615(3)(a), 09/15/01]

**(b) Deviation Reports**

Professional Coatings Inc. shall report in writing to Puget Sound Clean Air Agency Operating Permit Certification all instances of deviations from the permit requirements, including those attributable to upset conditions as defined in this permit, the probable cause of the deviations, and any corrective actions or preventive measures taken. Professional Coatings Inc. shall maintain a contemporaneous record of all deviations. Professional Coatings Inc. shall report any deviations to the Puget Sound Clean Air Agency that represent a potential threat to human health or safety by FAX (206-343-7522) or email

([inspection@pscleanair.org](mailto:inspection@pscleanair.org)) as soon as possible but no later than 12 hours after such a deviation is discovered. Professional Coatings Inc. shall report other deviations in writing to Puget Sound Clean Air Agency Operating Permit Certification on a monthly basis, within 30 days after the end of the month in which the deviation is discovered. Professional Coatings Inc. is not required to submit a monthly report for months during which there were no deviations, except that if there are no deviations for six consecutive months, Professional Coatings Inc. must report that there were no deviations within 30 days after the end of the six-month period. [WAC 173-401-615(3)(b), 09/15/01]

Professional Coatings Inc. shall report to the Puget Sound Clean Air Agency any instances where it failed to promptly repair any defective equipment. [WAC 173-401-615(3)(b), 09/15/01]

**(c) Reporting Certification**

Any application form, report, or compliance certification that is submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. [WAC 173-401-520, 11/4/1993]

All required reports must be certified by a responsible official consistent with WAC 173-401-520. Where an applicable requirement requires reporting more frequently than once every six months, the responsible official's certification needs only to be submitted once every six months, covering all required reporting since the date of the last certification, provided that the certification specifically identifies all documents subject to the certification. [WAC 173-401-615(3)(a), 09/15/01]

All reports required under this section shall be submitted the Puget Sound Clean Air Agency, at the following address:

Puget Sound Clean Air Agency  
Attn.: Operating Permit Certification  
110 Union Street, Suite 500  
Seattle, Washington 98101

## 2. Annual Emission Inventory

Professional Coatings Inc. shall report annually to the Puget Sound Clean Air Agency for those air contaminants that are emitted in amounts equal to or exceeding the following (tons per year) during the previous calendar year:

1. Carbon monoxide (CO) emissions	25
2. Facility combined total of all toxic air contaminants (TAC) emissions	6
3. Any single toxic air contaminant (TAC) emissions	2
4. Nitrogen oxide (NO <sub>x</sub> ) emissions	25
5. Particulate matter (PM <sub>10</sub> ) emissions	25
6. Particulate matter (PM <sub>2.5</sub> ) emissions	25
7. Sulfur oxide (SO <sub>x</sub> ) emissions	25
8. Volatile organic compounds (VOC) emissions	25

Annual emissions rates shall be reported to the nearest whole ton per year for only those contaminants that equal or exceed the thresholds above. Professional Coatings Inc. shall submit to the Puget Sound Clean Air Agency any additional information required by WAC 173-400-105(1) or Puget Sound Clean Air Agency Regulation III, Section 1.11. [Puget Sound Clean Air Agency Regulation I, Section 7.09(a), 9/10/1998]

## 3. Wood Furniture Manufactures NESHAP -- Reporting/Notification

### (a) *Notification of Compliance Status Report*

For new or reconstructed affected sources:

No later than 30 days after the end of the first 6 month period, the facility shall submit a Notification of Compliance Status to Puget Sound Clean Air Agency Operating Permit Certification in accordance with 40 CFR Section 63.804(f) and the applicable 40 CFR Section 63.9(h). [40 CFR Section 63.804(f) and 40 CFR Section 63.9(h)]

### (b) *Semiannual Compliance Certification Reports*

Professional Coatings Inc. shall submit a semiannual compliance certification report due on June 6 and Dec 30 to Puget Sound Clean Air Agency Operating Permit Certification in accordance with 40 CFR 63.807(3).

This semiannual report shall include the following:

- 1) The averaging calculation for each month within the semiannual period an submitting a compliance certification with the semiannual report

- 2) The certification report shall state the value of (E) as calculated in Equation 1, is no greater than 1.0 for existing sources or 0.8 for new sources.
- 3) Shall be signed by a responsible official of the company that owns or operated the affected source.
- 4) Shall demonstrate the coating and thinners are compliant by submitting a compliance certificate.
- 5) The certificate shall state that compliance stains, washcoats, sealers, topcoats, basecoats, enamels and thinners have been used each day. The periods of non-compliance shall be identified by records or sample results.
- 6) Shall use VHAP compliant coating and thinners that the viscosity is the same as the of the initial coating;

**(c) Annual Compliance Certification Reports**

Professional Coatings Inc. shall submit an annual compliance certification report to Puget Sound Clean Air Agency Operating Permit Certification by June 30 of each year for the period covering the preceding calendar year in accordance with 40 CFR 63.807(a)

**(d) Change in Information**

Professional Coatings Inc. shall provide in writing any change in the information that was already provided within 15 calendar days after the change in accordance with 40 CFR Section 63.9(j). [40 CFR Section 63.9(j)]

**(e) Startup, Shutdown, and Malfunction Reports**

Professional Coatings Inc. shall submit immediate startup, shutdown and malfunction reports to the Puget Sound Clean Air Agency if an action taken during a startup, shutdown or malfunction is not consistent with the procedures specified in the Startup, Shutdown and Malfunction Plan. These reports shall be submitted according to the procedures in [40 CFR 63.10(d)(5)(ii)]

**4. REPORTING SUMMARY**

This section was inserted in the table format to help Professional Coatings Inc. summarize the reporting requirements of this Air Operating Permit. For specific details, refer to the Air Operating Permit sections covering the activity or requirement.

**Table 5 Reporting Requirements**

<b>Report Description</b>	<b>Report Due</b>	<b>Comments</b>
Annual Compliance Certification Section V.M.	June 30 (once a year) (June – May)	The applicant shall submit an annual report indicating compliance with this Air Operating Permit
Semi-Annual Monitoring Report – Operating Permit Section V.Q.1.	June 30 (Dec. – May) and Dec. 30, 2002 (June – Nov.)	The applicant must submit a report covering the monitoring, and compliance with the
Monthly Deviation	30 days from end of month	None submitted

<b>Report Description</b>	<b>Report Due</b>	<b>Comments</b>
Reports Section V.Q.2.	the deviation occurs	
Semiannual Compliance Demonstration Report – NESHAP Section V.Q.4	6/30/2002 and 12/30/2002	Most recent report submitted by Professional Coating Inc
Exceedance of Baseline Levels in Professional Coatings Inc.'s Formulation Assessment Plan Section V.Q.5	When exceedance occurs	None submitted during the past 5 years
Annual Emission Report Section V.R.	Annually, by April 15 <sup>th</sup> for the previous reporting period, or by a different date if specified by the Puget Sound Clean Air Agency	Professional Coatings Inc. is required to submit annual emission data to PS Clean Air Agency

### 5. Required Recordkeeping

This section covers the recordkeeping requirements for specific equipment in a table form. This section was inserted to help Professional Coatings Inc. summarize the records that must be kept to comply with this Air Operating Permit.

**Table 6 Recordkeeping Reports and Complaint Response Plans**

<b>Recordkeeping Requirements Paraphrase (Information Only)</b>	<b>Comments</b>
Required Monitoring Info: date, time, who conducted inspection, results, corrective action, signed and dated Sections II.	Required for all monitoring logs and required recordkeeping
Complaint Response Plan: date and time of complaint, name of person complaining, nature of complaint, date, time and nature of corrective action Section V.O.4.	Complaint Response Plan should be implemented when a complaint is filed. The report must contain these recordkeeping requirements.

### 6. Monitoring Summary

This section covers the recordkeeping requirements for specific equipment in a table form. This section was inserted to help Professional Coatings Inc. summarize the records that must be kept to comply with this Air Operating Permit.

**Table 7 Operating Permit Monitoring (Facility-wide)**

Monitoring	Monitoring Frequency	Prescribed Operating Ranges & Specifications Paraphrase (Information Only)	Prescribed Maintenance Action if Out-of-Range Paraphrase (Information Only)
Opacity Monitoring	Weekly	Observe emissions from facility stacks	If visible emissions are observed, shut the equipment down as soon as practicable, but no later than 24 hours of initial observation.
Facility Inspections Section II.1.(c)	Quarterly	Audit: Inspect for prohibitive activities (e.g., open burning, concealment, masking)	If prohibitive activity is observed, the active must be shut down and reported as a deviation as per Section II.1.(c)
Work Practices Section II.1.(d)	Weekly	Check for closed containers, solvent containing rags in closed containers	Correct the problem immediately but no later than 24 hours after observation.
Maintenance of Insignificant Emission Units Section II.1.(e)	Quarterly	Maintain equipment as per manufacturer requirements	Correct the problem immediately but no later than 24 hours after observation.
Fugitive dust, track out, odor Section II.1.(f)	Weekly	Inspect for odors (likely to be injurious), fugitive dust and track out.	Eliminate the deviation promptly, but no later than 24 hours of identification correct or shut down the process (or clean up the material being tracked out).

**Table 8 Spray Coating Equipment Monitoring**

Monitoring	Monitoring Frequency	Prescribed Operating Ranges & Specifications Paraphrase (Information Only)	Prescribed Maintenance Action if Out-of-Range Paraphrase (Information Only)
Differential Pressure Section II.2(d)(1)	Daily	Acceptable range determined by manometer or filter distributor's recommendation	Correct the problem immediately but no later than 24 hours after observation.
Visual Check of Filter Condition and Fit Section II.2(d)(1)	Daily	Complete coverage	Correct the problem immediately but no later than 24 hours after observation.
Ductwork Section II.2(d)(1)	Quarterly	Structural Integrity (no holes, corrosion, etc.)	Correct problems in 24 hours
Fans Section II.2(d)(1)	Quarterly	Proper fan operation	Correct problems in 24 hours
Stack Exhaust Points Section II.2(d)(1)	Quarterly	No excess paint deposition	Correct problems identified that may be causing breakthrough and include in O&M in 1 week. Clean up excess paint deposition within 30 days

**Table 9 Bursh Cleaner Opacity Monitoring Plan**

Monitoring	Monitoring Frequency	Prescribed Operating Ranges & Specifications Paraphrase (Information Only)	Prescribed Maintenance Action if Out-of-Range Paraphrase (Information Only)
Visual Inspection of bags Section II.2.A.ii.a	Weekly	No holes or defects	Correct in 24 hours
Visual Check of area surrounding dust collector Section II.2.A.iii.c	Weekly	Particulate collected in dust free manner (no dust accumulation or spills)	Correct in 24 hours
Ductwork Section II.2.A.iii.b	Weekly	Structural Integrity (no visible emissions from points other than stack)	Correct in 24 hours

**R. Emergencies**

An emergency, as defined in WAC 173-401-645(1), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the conditions of WAC 173-401-645(3) are met.

The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

1. An emergency occurred and that Professional Coatings Inc. can identify the cause(s) of the emergency;
2. The permitted facility was at the time being properly operated;
3. During the period of the emergency Professional Coatings Inc. took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in the permit; and

4. Professional Coatings Inc. submitted notice of the emergency to the Puget Sound Clean Air Agency within two (2) working days of the time when the emissions limitations were exceeded due to the emergency or shorter periods of time specified in an applicable requirement. This notice fulfills the requirement of WAC 173-401-615(3)(b) unless the excess emissions represent a potential threat to human health or safety. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

In any enforcement proceeding, Professional Coatings Inc. has the burden of proof to establish the occurrence of an emergency. This provision is in addition to any emergency or upset provision contained in any applicable requirement. [WAC 173-401-645, 11/4/93]

#### **S. Unavoidable excess emissions**

Excess emissions due to startup or shutdown conditions, scheduled maintenance or upsets that are determined to be unavoidable under the procedures and criteria in WAC 173-400-107 shall be excused and not subject to penalty. For any excess emission that Professional Coatings Inc. wants the Puget Sound Clean Air Agency to consider unavoidable and excusable under WAC 173-400-107, Professional Coatings Inc. shall submit the information required under WAC 173-400-107. [WAC 173-400-107(2), 8/20/93 State/Puget Sound Clean Air Agency only]

#### **T. Need to halt or reduce activity not a defense**

It shall not be a defense for Professional Coatings Inc. in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [WAC 173-401-620(2)(b), 11/4/93]

#### **U. Stratospheric ozone and climate protection**

- 1) Professional Coatings Inc. shall comply with the following standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158; and
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
- 2) Professional Coatings Inc. may switch from any ozone-depleting substance to any alternative approved pursuant to the Significant New Alternatives Program (SNAP), 40 CFR Part 82, Subpart G, without a permit revision but shall not switch to a substitute listed as unacceptable pursuant to such program. [40 CFR 82.174, 1/13/95]
- 3) Any certified technician employed by Professional Coatings Inc. shall keep a copy of their certification at their place of employment. [40 CFR 82.166(1), 9/8/95]

- 4) Professional Coatings Inc. shall not willfully release any regulated refrigerant and shall use refrigerant extraction equipment to recover regulated refrigerant when servicing, repairing or disposing of commercial air conditioning, heating, or refrigeration systems. [40 CFR 82.154, 12/27/96] [RCW 70.94.970(2) and (4), 11/12/97 State/Puget Sound Clean Air Agency only]

**V. RACT satisfied**

Emission standards and other requirements contained in rules or regulatory orders in effect at the time of this permit issuance shall be considered RACT for the purposes of issuing this permit. [WAC 173-401-605(3), 11/4/93]

**W. Risk management programs**

In accordance with 40 CFR Part 68, if Professional Coatings Inc. has or receives more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, Professional Coatings Inc. shall comply with the requirements of the Chemical Accident Prevention Provisions of 40 CFR Part 68 no later than the following dates:

- 5) Three years after the date on which a regulated substance is first listed under 40 CFR 68.130; or
- 6) The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10, 1/6/1999]

**X. Definitions**

Unless otherwise defined in this permit, the terms used in this permit shall have the same meaning ascribed to them in the referenced regulation. [WAC 173-401-200, 11/4/93]

**Y. Duty to supplement or correct application**

Upon becoming aware that it has failed to submit any relevant facts in a permit application or that it has submitted incorrect information in a permit application, Professional Coatings Inc. shall promptly submit such supplementary facts or corrected information to the Puget Sound Clean Air Agency. [WAC 173-401-500(6), 11/4/93]

**Z. Insignificant emission units and activities**

- 1) Insignificant emission units and activities at Professional Coatings Inc. are subject to all applicable requirements set forth in Sections I.A, III and IV. This permit shall not require testing, monitoring, reporting or recordkeeping for insignificant emission units or activities. [WAC 173-401-530(2)(c), 11/4/93]
- 2) For insignificant emission units and activities, Professional Coatings Inc. does not need to certify compliance under WAC 173-401-630(5). [WAC 173-401-530(2)(d), 11/4/93]

- 3) An emission unit or activity that qualifies as insignificant solely on the basis of WAC 173-401-530(1)(a) shall not exceed the emission thresholds specified in WAC 173-401-530(4) until this permit is modified pursuant to Section VI.E of this permit and WAC 173-401-725. [WAC 173-401-530(6), 11/4/93]

## **VI. PERMIT ACTIONS**

### ***A. Permit Renewal, Revocation and Expiration***

- 1) **Renewal application**. Professional Coatings Inc. shall submit a complete permit renewal application to the Puget Sound Clean Air Agency no later than 12 months prior to the expiration of this permit (July 30, 2006). The Puget Sound Clean Air Agency will send Professional Coatings Inc. a renewal application no later than 18 months prior to the expiration of this permit (January 30, 2006). Failure of the Puget Sound Clean Air Agency to send Professional Coatings Inc. a renewal application shall not relieve Professional Coatings Inc. from the obligation to file a timely and complete renewal application. [WAC 173-401-710(1), 11/4/93; WAC 173-401-500(2), 11/4/93]
- 2) **Expired permits**. Permit expiration terminates Professional Coating Inc's right to operate unless a timely and complete renewal application has been submitted consistent with WAC 173-401-710(1) and WAC 173-401-500. All terms and conditions of the permit shall remain in effect after this permit expires if a timely and complete permit application has been submitted. [WAC 173-401-710(3), 11/4/93]
- 3) **Revocation of permits**. The Puget Sound Clean Air Agency may revoke a permit only upon the request of Professional Coatings Inc. or for cause. The Puget Sound Clean Air Agency shall provide at least thirty days written notice to Professional Coatings Inc. prior to revocation of the permit or denial of a permit renewal application. Such notice shall include an explanation of the basis for the proposed action and afford Professional Coatings Inc. an opportunity to meet with the Puget Sound Clean Air Agency prior to Puget Sound Clean Air Agency's final decision. A revocation issued under this condition may be issued conditionally with a future effective date and may specify that the revocation will not take effect if Professional Coatings Inc. satisfies the specified conditions before the effective date. Nothing in this subsection shall limit Puget Sound Clean Air Agency's authority to issue emergency orders. [WAC 173-401-710(4), 11/4/93]

### ***B. Administrative Permit Amendments***

- 1) **Definition**. An "administrative permit amendment" is a permit revision that:
  - a) Corrects typographical errors;
  - b) Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at Professional Coating Inc;
  - c) Requires more frequent monitoring or reporting by Professional Coating Inc;

- d) Allows for a change in ownership or operational control of a source where the Puget Sound Clean Air Agency determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Puget Sound Clean Air Agency;
  - e) Incorporates into the permit the terms, conditions, and provisions from orders approving notice of construction applications processed under an EPA-approved program, provided that such a program meets procedural requirements substantially equivalent to the requirements of WAC 173-401-700, 173-401-725, and 173-401-800 that would be applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in WAC 173-401-600 through 173-401-650. [WAC 173-401-720(1), 11/4/93]
- 2) **Administrative permit amendment procedures.** An **administrative** permit amendment may be made by the Puget Sound Clean Air Agency consistent with the following:
- a) The Puget Sound Clean Air Agency shall take no more than sixty days from receipt of a request for an administrative permit amendment to take final action on such request, and may incorporate such changes without providing notice to the public or affected states provided that it designates any such permit revisions as having been made pursuant to this paragraph.
  - b) The Puget Sound Clean Air Agency shall submit a copy of the revised permit to EPA.
  - c) Professional Coatings Inc. may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [WAC 173-401-720(3), 11/4/93]
- 3) **Permit shield.** The Puget Sound Clean Air Agency shall, upon taking final action granting a request for an administrative permit amendment, allow coverage by the permit shield in WAC 173-401-640 for administrative permit amendments made pursuant to part (1)(e) of this condition. [WAC 173-401-720(4), 11/4/93]

### ***C. Changes not Requiring Permit Revisions***

#### **1) General.**

- a) Professional Coatings Inc. is authorized to make the changes described in this section without a permit revision, providing the following conditions are met:
  - i) The proposed changes are not Title I modifications as defined in WAC 173-401-200(33);
  - ii) The proposed changes do not result in emissions that exceed those allowable under the permit, whether expressed as a rate of emissions, or in total emissions;
  - iii) The proposed changes do not alter permit terms that are necessary to enforce limitations on emissions from units covered by the permit; and
  - iv) Professional Coatings Inc. provides EPA and the Puget Sound Clean Air Agency with written notification at least seven days prior to making the

- proposed changes except that written notification of a change made in response to an emergency shall be provided as soon as possible after the event.
- b) Permit attachments. Professional Coatings Inc. and the Puget Sound Clean Air Agency shall attach each notice to their copy of the relevant permit.
- 2) **Section 502(b)(10) changes.** Pursuant to the conditions in subsection (1) of this section, **Professional Coatings Inc.** is authorized to make section 502(b)(10) changes (as defined in WAC 173-401-200(28)) without a permit revision.
- a) For each such change, the written notification required under subsection (1)(a)(iv) of this condition shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- b) The permit shield authorized under WAC 173-401-640 shall not apply to any change made pursuant to this paragraph.
- 3) **SIP authorized emissions trading.** Pursuant to the conditions in Subsection (1) of this condition, Professional Coatings Inc. is authorized to trade increases and decreases in emissions in the permitted facility, where the Washington state implementation plan provides for such emissions trades without requiring a permit revision. This provision is available in those cases where the permit does not already provide for such emissions trading.
- a) Under this Subsection (3), the written notification required under subsection (1)(a)(iv) of this condition shall include such information as may be required by the provision in the Washington state implementation plan authorizing the emissions trade, including at a minimum, when the proposed change will occur, a description of each such change, any change in emissions, the permit requirements with which Professional Coatings Inc. will comply using the emissions trading provisions of the Washington state implementation plan, and the pollutants emitted subject to the emissions trade. The notice shall also refer to the provisions with which Professional Coatings Inc. will comply in the applicable implementation plan and that provide for the emissions trade.
- b) The permit shield described in WAC 173-401-640 shall not extend to any change made under this paragraph. Compliance with the permit requirements that Professional Coatings Inc. will meet using the emissions trade shall be determined according to requirements of the applicable implementation plan authorizing the emissions trade. [WAC 173-401-722, 11/4/93]

**D. Off Permit Changes**

- (1) Professional Coatings Inc. shall be allowed to make changes not specifically addressed or prohibited by the permit terms and conditions without requiring a permit revision, provided that the proposed changes do not weaken the enforceability of existing permit conditions. Any change that is a Title I modification or is a change subject to the acid rain requirements under Title IV of the FCAA must be submitted as a permit revision.
- (2) Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition.
- (3) Professional Coatings Inc. must provide contemporaneous written notice to the Puget Sound Clean Air Agency and EPA of each such change, except for changes that qualify as insignificant under WAC 173-401-530. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
- (4) The change shall not qualify for the permit shield under WAC 173-401-640.
- (5) Professional Coatings Inc. shall keep a record describing changes made at Professional Coatings Inc. that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- (6) When making a change under this section, Professional Coatings Inc. shall comply with applicable preconstruction review requirements established pursuant to RCW 70.94.152 and Puget Sound Clean Air Agency Regulation I, Article 6. [WAC 173-401-724, 11/4/93]

**E. Permit Modification**

- (1) Definition. A permit modification is any revision to this permit that cannot be accomplished under provisions for administrative permit amendments under WAC 173-401-720.
- (2) Procedures. Minor permit modification procedures.

**Criteria**

- i) Minor permit modification procedures shall be used for those permit modifications that:
  - a) Do not violate any applicable requirement;
  - b) Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
  - c) Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;

- d) Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that Professional Coatings Inc. has assumed to avoid an applicable requirement to which Professional Coatings Inc. would otherwise be subject. Such terms and conditions include:
- A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the FCAA; and
  - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the FCAA;
- e) Are not modifications under any provision of Title I of the FCAA;
- ii) Notwithstanding (a)(i) of this subsection, and subsection (3) of this section, the Puget Sound Clean Air Agency may allow the use of minor permit modification procedures for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that the use of such minor permit modification procedures is explicitly provided for in the Washington state implementation plan or in applicable requirements promulgated by EPA and in effect on April 7, 1993.
- b) Application. An application requesting the use of minor permit modification procedures shall meet the requirements of WAC 173-401-510 and shall include the following:
- i) A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
  - ii) Professional Coating Inc's suggested draft permit;
  - iii) Certification by a responsible official, consistent with WAC 173-401-520, of the truth, accuracy, and completeness of the application and that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
  - iv) Completed forms for the Puget Sound Clean Air Agency to use to notify EPA and affected states as required under WAC 173-401-810 and 173-401-820.
- c) Professional Coating Inc's ability to make change. Professional Coatings Inc. may make the change proposed in its minor permit modification application immediately after it files such application provided that those changes requiring the submission of a notice of construction application have been reviewed and approved by the Puget Sound Clean Air Agency. After Professional Coatings Inc. makes the change allowed by the preceding sentence, and until the Puget Sound Clean Air Agency takes any of the actions specified in WAC 173-401-725(d), Professional Coatings Inc. must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time period, Professional Coatings Inc. need not comply with the existing permit terms and conditions it seeks to modify. However, if Professional Coatings Inc.

fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it.

- d) Permit shield. The permit shield under WAC 173-401-640 shall not extend to minor permit modifications.
- (3) **Group processing of minor permit modifications.** Consistent with WAC 173-401-725(3), the Puget Sound Clean Air Agency may process groups of a source's applications for certain modifications eligible for minor permit modification processing.
- (4) **Significant modification procedures.**
  - a) **Criteria.** Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative permit amendments. Every significant change in existing monitoring permit terms or conditions and every relaxation of reporting or recordkeeping permit terms or conditions shall be considered significant. Nothing herein shall be construed to preclude Professional Coatings Inc. from making changes consistent with Chapter 173-401 WAC that would render existing permit compliance terms and conditions irrelevant.
  - b) Significant permit modifications shall meet all requirements of Chapter 173-401 WAC, including those for applications, public participation, review by affected states, and review by EPA, as they apply to permit issuance and permit renewal. The Puget Sound Clean Air Agency shall complete review on the majority of significant permit modifications within nine months after receipt of a complete application. [WAC 173-401-725, 11/4/93]

#### **F. Reopening for Cause**

- (1) **Standard provisions.** This permit shall be reopened and revised under any of the following circumstances:
  - a) Additional applicable requirements become applicable to Professional Coatings Inc. with a remaining permit term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j);
  - b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit;
  - c) The Puget Sound Clean Air Agency or EPA determine that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or

- d) The Puget Sound Clean Air Agency or EPA determine that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (2) **Procedures.** Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
- (3) **Notice.** Reopenings under this section shall not be initiated before a notice of such intent is provided to Professional Coatings Inc. by the Puget Sound Clean Air Agency at least thirty days in advance of the date that the permit is to be reopened, except that the Puget Sound Clean Air Agency may provide a shorter time period in the case of an emergency. [WAC 173-401-730, 11/4/93]

## VII. PERMIT SHIELD

Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements contained in Sections I through VI of this permit that are specifically identified in this permit as of the date of permit issuance . [WAC 173-401-640(1), 11/4/93]

Nothing in this permit shall alter or affect the following:

- The provisions of Section 303 of the FCAA (emergency orders), including the authority of the administrator under that section;
- The liability of an owner or operator of Professional Coatings Inc. for any violation of applicable requirements prior to or at the time of permit issuance;
- The applicable requirements of the acid rain program, consistent with Section 408(a) of the FCAA;
- The ability of EPA to obtain information from a source pursuant to Section 114 of the FCAA; or
- The ability of the Puget Sound Clean Air Agency to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in chapter 252, Laws of 1993.

[WAC 173-401-640(4), 11/4/93]

## VIII. INAPPLICABLE REQUIREMENTS

As of the date of permit issuance, the requirements listed below do not apply to Girard, or to the specific emissions units specified below for the reasons indicated. The permit shield applies to all requirements so identified. [WAC 173-401-640(2)]

Reqmt. No.	Requirement	Adoption or Effective Date	Description and Reasons for Inapplicability Determination
VIII.1.	PSCAA Regulation I, 9.08	4/14/94	Fuel burning restrictions are inapplicable since Professional Coatings Inc. does not perform any fuel burning operations. Building heat is electric.
VIII.2.	WAC 173-400-050	4/14/94	Fuel burning restrictions are inapplicable since Professional Coatings Inc. does not perform any fuel burning operations. Building heat is electric.
VIII.3.	PSCAA Regulation I, 9.09(b)(1)	2/10/94	<20% opacity requirement as measured by CEMS is inapplicable because the source does not (and is not required to) monitor opacity with continuous emission monitors.
VIII.4.	PSCAA Regulation I, Article 12	8/10/89	Continuous Emission Monitoring System requirements are inapplicable since Professional Coatings Inc. is not required to use continuous emission monitors to assure compliance.
VIII.5.	WAC 173-400-105(5)	9/20/93	Continuous Emission Monitoring System requirements are inapplicable since Professional Coatings Inc. is not required to use continuous emission monitors to assure compliance.
VIII.7.	RCW 70.94.531 (State Only Requirement)	1991	The transportation demand management plan requirement is an inapplicable requirement since the requirement does not meet the definition of applicable requirement.
VIII.8.	PSCAA Order of Approval 1008	7/19/73	PSCAA Order of Approval No. 1008 was issued to Professional Coatings Inc. for a water wash spray booth which is no longer located at the facility.
VIII.9.	40 CFR Part 64 (CAM Rule)		No emission units are subject to 40 CFR Part 64 (EPA CAM Rule)

## **VII. APPENDICES**

### **Non-EPA Test Methods**

- Puget Sound Clean Air Agency Method 5
- Ecology Method 9A