Statement of Basis — July 30, 2002
for Professional Coatings, Inc.

Administrative Amendment 1: August 1, 2003

This document summarizes the legal and factual basis for the draft permit conditions in Professional Coatings, Inc. air operating permit to be issued under the authority of the Washington Clean Air Act, Chapter 70.94 Revised Code of Washington (RCW), Chapter 173-401 of the Washington Administrative Code (WAC), and Puget Sound Clean Air Agency Regulation I, Article 7. Unlike the permit, this document is not a legally enforceable document. It includes references to the applicable statutory or regulatory provisions that relate to Professional Coatings, Inc.'s air emissions, and provides a description of Professional Coatings, Inc.'s activities, including a short compliance history.

Air Operating Permit Renewal

Professional Coatings, Inc. has conducted their wood products coating business under an air operating permit for the past 5 years. Professional Coatings, Inc. has been cooperative and worked with the agency to correct any deficiencies found during inspections. The Air Operating Permit has been upgraded with current permit language and Statement of Bases will reflect the renewal process.

Professional Coatings, Inc. is subject to the Wood Furniture NESHAP and may need to comply with the proposed Wood Building Materials pending determination of the rules applicability. The MACT standard for Wood Building Materials will not be completed by May of 2002 as required in 40 CFR 112(j). Professional Coatings, Inc. probably would be subject to the Wood Building Materials MACT standard based on current status of the rule. However, when a facility's process is subject to one MACT standard (e.g., Wood Furniture MACT standard) the same process may not be subject to the second MACT standard (e.g.,Wood Materials MACT Standard).

1. Source Description

Professional Coatings, Inc. operates a manufacturing facility that coats wood and wood-fiber products at 2148 Port of Tacoma Road in Tacoma, Washington. Figure 1 is a process flow diagram illustrating the facility operations. Figure 2 is a site map. Professional Coatings, Inc. can potentially operate 24 hours per day, 365 days per year. Currently, however, the plant is operating two shifts per day, 80 hours per week, and 52 weeks per year. The facility Standard Industrial Classification (SIC) code is 2499 (NAICS: 321999 All other Miscellaneous Wood Product Manufacturing).

Professional Coatings, Inc. operates on a job-shop basis, coating material to meet individual customer requirements. A significant portion of the coated stock sheets is used by the wood furniture industry. The type, size, material, and quantity of items coated varies greatly. The principal products produced at the facility are painted wood and wood fiber board panels, and painted wood and wood fiber board siding strips.

Emissions will vary from year to year depending on the type and quantity of material coated; and the types and quantities of coatings and solvents used. Volatile Organic Compound (VOC) emissions are released to the outside air from the storage, handling, mixing, use, application, enhanced drying, and cleanup of VOC-containing coatings and solvents and coating application equipment. These emissions are described on a facility-wide basis in Section III of the permit.

Pollutant	1997	1998	1999	2000
Xylene	55 tons	30 tons	30 tons	23 tons

The facility has two primary production lines: one for panels (plywood, particle board, and other material), and one for siding (such as lap siding for houses). The facility performs only coating operations; and does not machine panels or siding. Most of the coatings used are solvent-based. Ancillary equipment to the coating lines includes two paint mixing rooms, four waste cleaning stations, one 15-gallon solvent still, one waste solvent tank, and one solvent tank.

On the panel board line only, panels to be coated are brushed clean of dust before coating. Dust is conveyed to a bag type/drum collection system enclosed in a "shed" adjoining the main building. On the panel board and siding lines, Professional Coatings, Inc. applies coatings using a variety of interchangeable components, including fixed spray guns, manually operated spray guns, and rollers. The coatings are dried using infrared heaters, electric heaters, and fans. Spray booths have dry filtration systems.

On the panel board line, a small sanding unit is currently being used as an intermediate step in the finishing process. The sanding unit exhausts to a small, bag-type dust collector that exhausts into the building.

The only fuel that the facility burns is in vehicles. Building heat is electric.

2. Compliance History with Puget Sound Clean Air Agency

Date	Enforcement Type (WW, NOV)	Regulation	Description	Disposition & Date
1/9/01	NOV 38377	Reg. I, 7.05 AOP #10911 – I.C.WP.1.6 AOP #10911 – I.A.1 AOP #10911 – II.B.vii AOP #10911 – II.B.xi	Violated Operating permit Open containers of VHAP No O&M plan for panel edge spray area. Violated spray coating O&M Violated operator training record keeping requirements	CP recommended 3/14/01 CP 9133 issued 5/4/2001 for $3,000 AOD accepted 5/24/2002 $1,500 pd $1,500 suspended Expires 5/24/2003
2/24/00	NOV 38356	Reg. I, 7.05 Reg. III, 2.02	Violated operating permit rules Violated 40 CFR	Closed 4/12/00 by letter

Date	Enforcement Type (WW, NOV)	Regulation	Description	Disposition & Date
		AOP #10911 – II.A.1(a) AOP #10911 – I.C.WP.1.6	Subpart 63 No monthly facility-wide opacity monitoring Open containers of VHAP materials.	

Professional Coatings, Inc. does not have any outstanding enforcement actions as of the time of the issuance of this Air Operating Permit

3. Emission Inventory

See Attachment A.

4. Basis for Applicable Requirements

Applicable requirements are listed in several sections of this operating permit as outlined below. The permit lists only the requirements that Puget Sound Clean Air Agency has determined to be within the scope of the definition of "applicable requirements" under the operating permit program. Professional Coatings, Inc. is legally responsible for complying with all applicable requirements of the operating permit as well as other air quality requirements that do not constitute "applicable requirements" as defined in Chapter 173-401 Washington Administrative Code (WAC).

Professional Coatings, Inc. is subject to all the requirements listed in all the tables contained in Section I of the permit. The tables in Section I of the permit list emission limitations, performance standards, and work practice standards that require routine monitoring by Professional Coatings, Inc. to assure compliance. The tables in Section I. A. include facility wide emission limits, the tables in Section I. B. include emission unit specific requirements, and the table in Section I. C. includes the work practice standards required in the Wood Furniture National Emission Standard for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart JJ. To simplify the permit, Puget Sound Clean Air Agency did not repeat the facility wide emission limits for each emission unit unless the monitoring method was more specific to the listed emission unit.

Some of the applicable requirements in the permit did not have specific monitoring requirements associated with them. For such requirements, the Puget Sound Clean Air Agency developed monitoring requirements. (This is sometimes called gap filling.) Section V.P Data recovery addresses the amounts of data recovery required for these monitoring requirements that were developed specifically for the permit. The section also addresses procedures to follow if the monitoring system fails or data is lost. The requirements of the section only apply as noted in Section II of the permit and under no circumstances does this section apply if a specific underlying applicable requirement is more stringent.

In developing the data recovery requirements, the Agency considered similar data recovery requirements such as Regulation I, Section 12.03, the frequency of the monitoring, and the nature of the information required to monitor. For monitoring that the permit requires on a quarterly or less frequent basis, the data recovery requirements are 100%.

The first column of the tables contains numbers assigned to the requirement or requirements for identification purposes. The tables list the citation for the "applicable requirement" in the second column. In some cases, Puget Sound Clean Air Agency grouped together similar requirements that use the same monitoring and testing methods. Although these are similar requirements, Professional Coatings, Inc. must comply with each of the listed applicable requirements. The third column of the table (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 Section 110, 111, or 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 fourth (Requirement Paraphrase) and sixth (Emission Standard Period) columns paraphrase the requirement. In some cases, the requirement paraphrase has been expanded from Professional Coatings, Inc.'s permit application to better describe the requirements. When there is no emission standard period in the requirement, and Puget Sound Clean Air Agency has determined none is necessary, "Not Applicable" appears in the sixth column.

The paraphrasing contained in the fourth and sixth columns 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. The reader must review all requirements fully and only use the paraphrase as a tool to assist in identifying the requirement. In the event of conflict or omission between the information contained in the fourth and sixth columns and the actual statute, regulation and requirement cited in the second column, the requirements and language of the actual statute, regulation or requirement cited shall govern.

The fifth column (Monitoring & Recordkeeping Method) identifies the activities that Professional Coatings, Inc. will use to assure compliance with the applicable requirements identified in the second column. These methods are described in Section II of the permit. Puget Sound Clean Air Agency expanded some of the Monitoring and Recordkeeping methods from the permit application to better define the method. Complying with the method is a requirement of the permit. Professional Coatings, Inc. may use the results of the Monitoring & Recordkeeping Method as a surrogate for the Emission Standard Reference Test Method for the purpose of certifying compliance as required in Section V. M. but, as described below, the results of any Standard Reference Test Method shall always have precedence.

The last column (Emission Standard Reference Test Method) is the official method used by Puget Sound Clean Air Agency or EPA to determine violations of the emission standard and is a requirement of the permit. In some cases, the applicable requirement does not cite a test method. If Puget Sound Clean Air Agency has determined that a test method is not necessary, "Not Applicable" appears in the last column, and Puget Sound Clean Air Agency, EPA, or other

authorized representatives will determine compliance based on, but not limited to, the results of monitoring and observations, and the review of operation and maintenance procedures. In the event of conflict between the information resulting from the Monitoring & Recordkeeping Method (fifth column) and the Emission Standard Reference Test Method (last column), the results from the Emission Standard Reference Test Method shall govern.

Applicable Requirements Listed in Section I. A.

In developing the permit, Puget Sound Clean Air Agency grouped similar applicable requirements together in the tables if the same monitoring and test methods were required. In addition, Puget Sound Clean Air Agency evaluated all monitoring methods proposed by Professional Coatings, Inc. to determine appropriateness for determining compliance. The basis for each grouping and a discussion of the appropriateness of the monitoring method for assuring compliance with the requirement is provided below:

1.11 Requirement I.A.1

Both WAC 173-400-040(1) and Puget Sound Clean Air Agency Regulation I, Section 9.03 standards are 20% opacity and apply to all stationary sources. Although the permit lists all these requirements together, Professional Coatings, Inc. must comply with each.

The monitoring method is based on visible emission inspections of the facility at least once per week. Inspections are to be performed while the facility is in operation during daylight hours. If visible emissions other than uncombined water are observed from a single unit or activity, Professional Coatings, Inc. shall, as soon as possible but within 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 WDOE Method 9A, or shut down the unit or activity until it can be repaired. If Professional Coatings, Inc. corrects the visible emissions within 24 hours of initial observation or shuts down the unit or activity within 24 hours until it is repaired or corrected, Professional Coatings, Inc. does not need to report the deviation under Section V.M. (Compliance Certifications) or Section V.Q. (Reporting). However, if Professional Coatings, Inc. does not take appropriate action within 24 hours, Professional Coatings, Inc. must report the deviation. The Puget Sound Clean Air Agency has determined that the monitoring should be quarterly for the reasons listed below.

1) Compliance. None of the emission units at Professional Coatings, Inc. normally have visible emissions. The emission units are also unlikely to generate visible emissions except under the most unusual circumstances. In addition, the Puget Sound Clean Air Agency has inspected this facility at least annually since 1986 and has not identified opacity issues, nor has Professional Coatings, Inc.. Therefore, we conclude that it is generally in compliance with the opacity requirement and the margin of compliance is large. In addition, the monitoring method is designed so that Professional Coatings, Inc. will take corrective action before a violation occurs, further enhancing the compliance margin.
2) Variability of process and emissions. None of the processes at Professional Coatings, Inc. Tacoma facility normally emit visible emissions, except as noted above. While many of the processes are variable or batch operations, the most likely cause of visible emissions would be

a significant change in the process, one that would require approval from the Puget Sound Clean Air Agency, or major equipment failure. The specific emission units that are most likely to fail and have significant visible emissions, such as the spray booths and baghouses, are addressed elsewhere in the permit.

3) Environmental impacts of problems. Observed opacity is generally related to emissions of particulate matter or finely divided liquid droplets. The manufacturing activities at Professional Coatings, Inc. typically do not generate significant quantities of particulate matter. Hence, the environmental impacts of the emissions are small. A maintenance problem is unlikely to result in emissions that would have a significant environmental impact.

4) Technical considerations. The emission units that are likely to generate visible emissions are addressed elsewhere in the permit.

1.12 Requirement I.A.2

Both, Puget Sound Clean Air Agency Regulation I, Section 9.07 and WAC 173-400-040(6) are equivalent requirements (SO_2 emissions not to exceed 1000 ppmv), except for the second paragraph of the WAC, which is not in the Puget Sound Clean Air Agency regulation. The second paragraph of WAC 173-400-040(6), which is not federally enforceable, allows for exceptions to this requirement if the source can demonstrate that there is no feasible method of reducing the SO_2 concentrations to 1000 ppm. Professional Coatings, Inc. does not burn natural gas and does not have any combustion emission units.

1.13 Requirement I.A.3

Puget Sound Clean Air Agency Regulation I, Section 9.09 limits particulate emissions to 0.05 gr/dscf from equipment used in a manufacturing process. WAC 173-400-060 limits particulate emissions to 0.1 gr/dscf from general process units (i.e., units using a procedure or a combination of procedures for the purpose of causing a change in material by either chemical or physical means, excluding combustion).

The monitoring method is based on quarterly visual inspections of the facility for visible emissions, opacity monitoring as a surrogate to performing a Method 5 test with Professional Coatings, Inc. taking corrective action if any visible emissions are noted. As with Requirement I.A.1, the Puget Sound Clean Air Agency has determined through its inspections and permitting that it is unlikely that Professional Coatings, Inc. Tacoma facility will have any visible emissions or exceed the particulate limit. Recording of visible emissions is not necessarily a deviation of the particulate concentration standard because the threshold for observing visible emissions occurs at a particulate concentration of less than 0.05 gr/dscf. However, failure to take timely corrective action, as defined in the permit, is a deviation from the specific permit requirement and must be reported to the Puget Sound Clean Air Agency. Taking corrective action does not relieve Professional Coatings, Inc. from the obligation to comply with the particulate concentration standard itself. The Puget Sound Clean Air Agency has determined that the monitoring should be weekly for the reasons listed above in Section 1.4.1.13.

Puget Sound Clean Air Agency Regulation I, Section 9.09 also limits particulate emissions to 0.05 gr/dscf corrected to 7% oxygen from fuel burning equipment (i.e., equipment that produces hot air, hot water, steam, or other heated fluids by external combustion of fuel) combusting natural gas. WAC 173-400-050(1) limits particulate emissions to 0.1 gr/dscf corrected to 7% O_2 from all combustion units (i.e., units using combustion for steam production or other process requirements, excluding open burning). Professional Coatings, Inc. does not burn any natural gas because all equipment is electric. Professional Coatings, Inc. is incapable of violating this standard while complying with the other requirements. Improper fuel burning that would result in high particulate emissions would also cause opacity problems and would be detected by the opacity monitoring requirement.

The State Implementation Plan (SIP) identifies the effective date of WAC 173-400-050 and WAC 173-400-060 as August 20, 1993; however, the versions that were in effect on August 20, 1993 became effective on March 22, 1991.

1.14 Requirement I.A.4

Puget Sound Clean Air Agency Regulation I, Section 9.11 and WAC 173-400-040(5) are similar requirements that address emissions that may be environmentally detrimental or cause a nuisance. Although the permit lists all these requirements together, Professional Coatings, Inc. must comply with each. The monitoring method for all is based on responding to complaints and general inspections of the facility to identify any emissions that are likely to be injurious to human health, plant or animal life, or property, or that unreasonably interfere with enjoyment of life and property. For the following reasons, the Puget Sound Clean Air Agency has determined that the weekly facility-wide inspections required in Section II.A.1(c) of the permit are sufficient to monitor for changes that would cause a fugitive emission or unexpected buildup of dust on the roadways and plant grounds.

1) Initial compliance. The Puget Sound Clean Air Agency has not received any complaints concerning Professional Coatings, Inc. Tacoma facility regarding fugitive dust or odor emissions over the past five years and has not observed visible or odorous emissions from plant activities during any inspection. Therefore, we conclude that it is generally in compliance with the nuisance requirements.

2) Margin of compliance. Because the Agency has not observed nuisance problems, and the fact that the current operations are unlikely to cause nuisance problems, the Puget Sound Clean Air Agency has determined that the margin of compliance is sufficient to only require quarterly inspections and response to complaints as necessary. The emission of fugitive dust or odor is unlikely to generate off-site fallout or complaints except under the most unusual circumstances.

3) Variability of process and emissions. Professional Coatings, Inc. does not have emission units that are likely to generate emissions that would cause a nuisance. In addition, Professional Coatings, Inc. is unlikely to install such emission units during the life of the permit.

4) Environmental impacts of problems. Nuisance emissions can cause personal discomfort; however, by their nature do not result in exceedances of federal emissions or ambient

standards. By responding quickly to complaints and identifying problems before they cause complaints, the environmental impact of nuisances should be small.

5) Technical considerations. Catastrophic failures of one of the spray booths or dust collectors, are the only likely causes of a nuisance causing a deviation at Professional Coatings, Inc. Tacoma facility. The dust collectors and spray booths are equipped with high efficiency filters and are monitored at least daily or weekly by Professional Coatings, Inc., thereby minimizing the chance of generating emissions that may cause a nuisance. The permit requires Professional Coatings, Inc. to both look for possible nuisances on a regular basis and handle upset emissions of nuisance causing particulate or odor bearing contaminants more frequently on an as-needed basis. This minimizes the probability of causing an emission that could be injurious to health, plant or animal life, or property; or that unreasonably interferes with the enjoyment of life and property. The monitoring method is designed so that Professional Coatings, Inc. will take corrective action before a violation occurs. In addition, in the past five years the Puget Sound Clean Air Agency has not noted nor received complaints about Professional Coatings, Inc. causing emissions that are likely to be injurious to health, plant or animal life, or property or that unreasonably interfere with enjoyment of life and property. Therefore, the Puget Sound Clean Air Agency has determined that daily and weekly monitoring is adequate. Receiving complaints does not necessarily mean Professional Coatings, Inc. is in violation of this requirement, but Professional Coatings, Inc. has a responsibility to investigate complaints and take corrective action if necessary. Failure to take timely corrective action, as defined by the monitoring method, is a deviation of the specific permit term. Taking corrective action does not relieve Professional Coatings, Inc. from the obligation to comply with the nuisance requirement itself.

1.15 Requirements I.A.5 through I.A.7

The fugitive dust requirements are in I.A 5 through I.A.7 and addressed in Regulation I, Section 9.15 and WAC 173-400-040(3). The Puget Sound Clean Air Agency Board of Directors made significant revisions to Regulation I, Section 9.15 on March 11, 1999. The amended version will be forwarded to EPA as a SIP amendment. Upon approval of the SIP changes, the revised version of Regulation I, Section 9.15 will be federally enforceable, and the old version will no longer apply. The revised rule requires the use of reasonable precautions for fugitive dust. We have included both versions of Section 9.15 because they are significantly different. The Monitoring, Maintenance, and Recordkeeping Methods are the same as those listed in I.A.5 through I.A.7.

The SIP version of Puget Sound Clean Air Agency Regulation I, Section 9.15 requires best available control technology (BACT) for all fugitive dust, limits vehicle dust track-out, and limits fugitive dust from manufacturing and control equipment. The current version of Section 9.15 and WAC 173-400-040(3) requires reasonable precautions to minimize or prevent fugitive emissions. The Puget Sound Clean Air Agency's current rule also describes specific examples of reasonable precautions. There is no difference between the current and SIP versions of WAC 173-400-040(3).

All the fugitive emission regulations have common monitoring methods of responding to complaints and looking for fugitive emissions. The Puget Sound Clean Air Agency has determined that monitoring should be weekly for the reasons listed below.

1) Initial compliance. The Puget Sound Clean Air Agency has not observed fugitive emissions

during any inspection in the past five years, nor has Professional Coatings, Inc.; therefore, we conclude that it is generally in compliance with this requirement.

2) Margin of compliance. For known sources of potential fugitive dust, the buildings at Professional Coatings, Inc. are enclosed and all of the roadways and parking lots are paved, the back property is not pave, however all areas are reasonably maintained. All the significant air pollution generating equipment has air pollution control devices and is inspected by Professional Coatings, Inc. periodically and maintained on a regular basis. Hence, the margin of compliance is considered large enough to warrant quarterly and as needed inspections.

3) Variability of process and emissions. While many of the processes are variable or batch operations, few if any are likely to cause fugitive emissions. The most likely cause of fugitive emissions would be a significant change in the process, one that would require approval from the Puget Sound Clean Air Agency, or major equipment failure.

4) Environmental impacts of problems. Because Professional Coatings, Inc. employs BACT for fugitive dust control, the likelihood of fugitive dust is very low. Any fugitive dust emissions are likely to be small and without significant environmental impact.

5) Technical considerations. The most likely causes of fugitive emissions at Professional Coatings, Inc. Tacoma facility would be failure of existing control equipment or vehicle track-out during construction. Equipment failure is likely to be identified by some other inspection or complaints. Track-out is minimized because the roadways and parking lots are paved (back of building is not paved) and maintained.

1.16 Requirement I.A.8

Puget Sound Clean Air Agency Regulation I, Section 9.20 requires Professional Coatings, Inc. to maintain equipment in good working order. Section 9.20(a) applies to sources that received a Notice of Construction Order of Approval under Puget Sound Clean Air Agency Regulation I, Article 6. Section 9.20(b) applies to equipment not subject to Section 9.20(a). Section II, Monitoring, Maintenance and Recordkeeping Procedures, of the permit identifies the minimum monitoring criteria for maintaining equipment in good working order. The section identifies both facility-wide criteria and specific criteria for the emission units and activities. In addition, the facility-wide inspections provide monitoring of the general effectiveness of Professional Coatings, Inc. Operation and Maintenance Plan. The Puget Sound Clean Air Agency chose to list all of Section II as the monitoring method because many parts of Section II apply to several emission units and activities. Where there are specific monitoring requirements for specific emission units, the Puget Sound Clean Air Agency has listed them in Section II.A.2. The Puget Sound Clean Air Agency has determined that following the requirements of Section II of the permit provides sufficient monitoring criteria to certify that the equipment has been maintained in good working order. However, the Puget Sound Clean Air Agency reserves the right to evaluate the maintenance of each piece of equipment to determine if it has been maintained in good working order.

1.17 Requirement I.A.9

In accordance with Puget Sound Clean Air Agency Regulation I, Section 7.09(b), Professional Coatings, Inc. is required to develop and implement an Operation and Maintenance Plan (O&M Plan) to assure continuous compliance with Puget Sound Clean Air Agency Regulations I, II, and III. The requirement specifies that the plan shall reflect good industrial practice, but does not define how to determine good industrial practice. To clarify the requirement, the Puget Sound Clean Air Agency added that, 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. This language is consistent with a Washington Department of Ecology requirement in WAC 173-400-101(4). The Puget Sound Clean Air Agency also added language establishing criteria for determining if good industrial practice is being used. These include monitoring results, opacity observations, review of operations and maintenance procedures, and inspections of the emission unit or equipment. The Puget Sound Clean Air Agency added this wording in response to Washington State court decision, Longview Fiber Co. v. DOE, 89 Win. App. 627 (1998), which held that similar wording was not vague and gave sufficient notice of the prohibited conduct.

Puget Sound Clean Air Agency's requirement for an O&M Plan contains requirements for a Startup, Shutdown and Malfunction Plan which are equivalent to those required in the General Provisions for the Part 63 NESHAPS (40 CFR Section 63.6(e)). Puget Sound Clean Air Agency's requirement also covers the general recordkeeping and reporting requirements associated with the plan in accordance with the General Provisions (40 CFR Sections 63.10(b)(2) and (d)). Therefore, these requirements have been grouped together in Requirement I. A. 1. The Startup, Shutdown and Malfunction Plan required by the General Provisions for Part 63 National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR §63.6(e)(3), must be incorporated by reference at the time of required compliance with the Wood Furniture NESHAP (40 CFR Part 63, Subpart JJ). However, the requirements contained in Section II. B. of the permit already adequately address startup, shutdown and malfunctions. Therefore, no additional information will need to be incorporated into the permit at the time of required compliance.

Puget Sound Clean Air Agency Regulation I, Section 7.09(b) also requires Professional Coatings, Inc. to promptly correct any defective equipment. However, the underlying requirement in most instances does not define "promptly"; hence for significant emission units and applicable requirements that Professional Coatings, Inc. has a reasonable possibility of violating or that a violation would cause an air quality problem, the Puget Sound Clean Air Agency added clarification that "promptly" usually means within 24 hours. For many insignificant emission units and equipment not listed in the permit, "promptly" cannot be defined because the emission sources and suitable pollution control techniques vary widely, depending on the contaminant sources and the pollution control technology employed. However, the permit identifies a means by which to identify if Professional Coatings, Inc. is following good industrial practice.

As described in Section V.Q, Professional Coatings, Inc. must report to the Puget Sound Clean Air Agency any instances where it failed to promptly repair any defective equipment, both equipment that received approval from the Agency and that which did not. In addition, Professional Coatings,

Inc. has the right to claim certain problems were a result of an emergency (Section V.S) or unavoidable (Section V.T).

Following these requirements demonstrates that Professional Coatings, Inc. has properly implemented the O&M Plan, but it does not prohibit the Puget Sound Clean Air Agency or EPA from taking any necessary enforcement action to address violations of the underlying applicable requirements after proper investigation. However, not following its own O&M Plan is an indication that Professional Coatings, Inc. was not using good industrial practice.

1.18 Requirement I.A.10

WAC 173-400-040(4) addresses odors. The monitoring method is based on responding to complaints and general inspections of the facility to identify emissions of odor-bearing contaminants. Receiving complaints does not necessarily mean Professional Coatings, Inc. is in violation of this requirement, since the regulation does not prohibit the emission of odors, but prohibits the emissions of odors if reasonable control measures are not employed. Complaints will trigger action by Professional Coatings, Inc. to investigate and prevent a violation. Since the Puget Sound Clean Air Agency and Professional Coatings, Inc. have not received odor complaints concerning Professional Coatings, Inc. Tacoma facility, the Puget Sound Clean Air Agency has determined that responding to complaints within three working days is appropriate.

1.19 Requirement I.A.11

WAC 173-400-040(2) prohibits the emission of particulate matter from the facility to be deposited beyond the property line in sufficient quantity as to unreasonably interfere with the use and enjoyment of the property upon which the material is deposited. The monitoring method is based on responding to complaints and general inspections of the facility to identify any particulate emissions or deposition of particulate that may unreasonably interfere with the use and enjoyment of property. Receiving complaints does not necessarily mean Professional Coatings, Inc. is in violation of this requirement, but triggers action by the source to prevent a violation.

1.110 Requirement I.A.12

RCW 70.94.040 is similar to Puget Sound Clean Air Agency Regulation I, Section 9.11 and is listed separately here because it is not a federally enforceable requirement.

1.111 Requirement I.A.13

Puget Sound Clean Air Agency Regulation I, Section 9.10 specifies that HCl emissions shall not exceed 100 ppm (dry) corrected to 7% O_2 for combustion sources. Since Professional Coatings, Inc. does not burns pipeline grade natural gas the other processes do not use chlorine in a form likely to emit HCl, it is incapable of violating this standard while complying with the other requirements in the permit. Therefore, the permit does not contain additional monitoring requirements.

Emission Unit Specific Applicable Requirements

Professional Coatings, Inc. has two specific emission units with applicable requirements listed in the tables in Section I. B. The spray coating operations consist of a siding line (spray booth and drying oven), a panel line (spray booth and drying ovens), and activities associated with surface coating such as mixing and cleaning operations and solvent recovery. The brush cleaner operations consist of activities associated with brush cleaning on the panel line and includes control of particulate with a bag-type dust collector.

The basis for determining emission unit applicable requirements and a discussion of the appropriateness of the monitoring method for assuring compliance with such requirements is provided below.

2.1.1 Requirement EU 1.1

Puget Sound Clean Air Agency has repeated the requirements for developing an O&M Plan (Puget Sound Clean Air Agency Regulation I, Section 7.09(b)) and maintaining equipment in good working order (Puget Sound Clean Air Agency Regulation I, Section 9.20), because there are requirements specific to these spray booths. The monitoring method includes specific operating parameters for the spray coating operations which need to be included in Professional Coatings, Inc.'s facility O&M Plan.

2.1.2 Requirement EU 1. 2

Since Professional Coatings, Inc. is using spray equipment to apply VOC-containing material, Puget Sound Clean Air Agency Regulation I, Section 9.16 applies. Professional Coatings, Inc. uses two dry filter spray booths with vertical, unobstructed exhaust points.

2.1.3 Requirements EU 1. 3. through EU 1. 5

EPA adopted a National Emission Standard for Hazardous Air Pollutants (NESHAP) from Wood Furniture Manufacturing Operations on December 7, 1995 (40 CFR Part 63, Subpart JJ). Puget Sound Clean Air Agency and EPA have determined that the NESHAP is an applicable requirement for Professional Coatings, Inc. since Professional Coatings, Inc. coats wood furniture components, and the SIC codes listed are appropriate for at least some of the processes performed at Professional Coatings, Inc., even though the facility SIC code is not specifically listed in the NESHAP. Puget Sound Clean Air Agency considers the correspondence from Professional Coatings, Inc. on this applicability determination as a revision to the original permit application.

The Wood Furniture NESHAP limits volatile hazardous air pollutant (VHAP) content in coatings and thinners in 40 CFR Section 63.802(a)(1). These limits only apply if the finishing material is applied to a wood furniture component (i.e., drawer sides, cabinet doors, laminated tops, etc.) since the NESHAP specifically defines finishing material as a coating used in the wood furniture industry. Professional Coatings, Inc. has chosen to use the emission averaging option in 40 CFR Section 63.804(a)(1) for complying with the rule. The VOC content in strippable spray booth coatings is limited in 40 CFR Section 63.802(a)(3). Strippable spray

booth coating means a coating that is applied on a spray booth wall to provide a protective film to receive overspray during finishing operations and that is subsequently peeled off and disposed. These limits are included in both tables pertaining to spray coating operations at the site. Appropriate monitoring as specified in the NESHAP and recordkeeping requirements specified in 40 CFR Sections 63.806(b)(1) through (3), and 63.806(c) of the Wood Furniture NESHAP have been addressed in the NESHAP Coating Compliance Plan (See Section II. B. viii) and NESHAP Strippable Spray Booth Coatings Compliance Plan (See Section II. 2(b)(ii)) of the permit.

The VHAP content in contact adhesives is limited in 40 CFR Section 63.802(a)(2). These limits for contact adhesives have been included in the permit since Professional Coatings, Inc. is not prohibited from using contact adhesives. However, Professional Coatings, Inc. does not currently use contact adhesives in the facility.

Since HAP emissions were above 50 tons in 1996, Professional Coatings, Inc. has complied with the Wood Furniture NESHAP emission limits by November 21, 1997. Professional Coatings, Inc. is required to submit an emission report to Puget Sound Clean Air Agency on an annual basis (Puget Sound Clean Air Agency Regulation I, Section 7.09, Permit Requirement V. R.). This information was used to verify the appropriate compliance date.

2.1.4 Requirements EU 2. 1. through EU 2. 3

The facility wide applicable requirements listed in I. A. 1., I. A. 2., I. A. 4., I. A. 8., and I. A. 9. that pertain to opacity, particulate matter emission limits, fugitive dust, development of an O&M Plan, and maintaining equipment in good working order (see above) have been repeated under this specific emission unit since the brush cleaner operation and corresponding bag-type dust collector require specific monitoring requirements. The monitoring method includes specific operating parameters for the brush cleaning operations and corresponding bag-type dust collector which need to be included in Professional Coatings, Inc.'s facility O&M Plan. Puget Sound Clean Air Agency's "Agency Policy of Fugitive Dust Controls, November 1999" which specifies reasonable precautions that must be taken to prevent fugitive dust emissions, was used as guidance to determine some of the appropriate periodic monitoring methods.

Work Practice Standards in the Wood Furniture NESHAP

3.1.1. Requirements WP 1.1 through 1.9

The Wood Furniture NESHAP requires Professional Coatings, Inc. to 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 presented in 40 CFR Section 63.803(b) through (l). The requirements contained in Section II. B. of the permit adequately address the work practice standards and have already been incorporated into the permit. Compliance determinations are based on, but not limited to, the results of monitoring and observations, and the review of operation and maintenance procedures.

The recordkeeping requirements specified in 40 CFR Sections 63.806(e)(1) through (6) of the Wood Furniture NESHAP have been addressed in the monitoring methods for each work practice standard (See Section II. B. xi through II. B. xvi.) and Section II. C. regarding inspection records.

5. Obsolete Requirements

Puget Sound Clean Air Agency Notice of Construction Orders of Approval Nos. 755, 4975 and 6029 contain three general approval conditions. Condition No. 1 requires the applicant to install the equipment according to the specifications submitted to the Puget Sound Clean Air Agency. The applicant is also required to submit a Notice of Completion when the installation is complete. In all cases, Professional Coatings, Inc. has submitted the notice, and the Puget Sound Clean Air Agency has determined that the installation was according to the specifications. If Professional Coatings, Inc. modifies these emission units, it would have to notify the Puget Sound Clean Air Agency under Section IV.A of the permit. Therefore, the Puget Sound Clean Air Agency has determined that the conditions are obsolete.

Approval Condition No. 2 informs the applicant that it must develop and implement an O&M Plan. Approval Condition No. 3 informs the applicant that it must meet the requirements of any other regulation. The Puget Sound Clean Air Agency has determined that these are informational statements and do not meet the criteria of being an applicable requirements.

6. Prohibited Activities

Some of the requirements identified in the operating permit application submitted by Professional Coatings, Inc. are included in Section III as prohibited activities. Since these activities are prohibited, routine monitoring of parameters is not appropriate. Instead, Puget Sound Clean Air Agency has listed these activities in this section to highlight that they cannot occur at the facility.

In two cases, the permit language for the prohibited activity has been simplified by grouping several requirements together. Although these are similar requirements, Professional Coatings, Inc. must comply with each of the listed applicable requirements. The basis for this grouping is summarized below:

- Requirements III. D. Puget Sound Clean Air Agency Regulation I, Section 9.13(a), WAC 173-400-040(7) and 40 CFR 63.4(b) contain similar requirements addressing concealment of emissions. Although all requirements apply, the requirements in WAC 173-400-040(7) and 40 CFR 63.4(b) have been grouped under the language of Puget Sound Clean Air Agency Regulation I, Section 9.13(a) to simplify the permit. 40 CFR Section 63.4(b) is part of the general provisions for Part 63 NESHAPs and will not result in substantive requirements until after the Wood Furniture NESHAP compliance date.
- Requirements III. E. Puget Sound Clean Air Agency Regulation I, Section 9.13(b) and WAC 173-400-040(7) contain similar requirements addressing masking of emissions. Although all requirements apply, the requirements of WAC 173-400-040(7) have been grouped under the language of Puget Sound Clean Air Agency Regulation I, Section 9.13(b) to simplify the permit.

7. Activities Requiring Additional Approval

Some of the requirements identified in the operating permit application submitted by Professional Coatings, Inc. are included in Section IV as activities that require additional approval. For new source review, the permit language has been simplified. The basis for this determination is summarized below:

- Requirement IV. 1. Both the state (WAC 173-400-110 and Chapter 173-460 WAC) and Puget Sound Clean Air Agency (Regulation I, Article 6) new source review programs require approval to construct, install, establish, or modify an air contaminant source. Although all these requirements apply, the language in these requirements has been incorporated into one section to simplify the permit language. New and modified sources are required to apply Best Available Control Technology (BACT), and BACT is defined to include all requirements in the NESHAP. Therefore, the Wood Furniture NESHAP requirements for new and reconstructed sources (procedural requirements included in the general provisions in 40 CFR Section 63.5) are covered by this language.

8. Standard Terms and Conditions

Some of the requirements identified in the operating permit application submitted by Professional Coatings, Inc. are included in Section V, Standard Terms and Conditions. This provided an easier mechanism for describing requirements that are more general in nature. Also in this section are the standard terms and conditions specifically listed in WAC 173-401-620 and the following requirements in the General Provisions for the Part 63 NESHAPs (40 CFR Part 63, Subpart A) and the Wood Furniture NESHAP (40 CFR Part 63, Subpart JJ):

- Prohibited activities in 40 CFR Section 63.4(a) have been included under Condition V. L. of the permit (Compliance Requirements).
- The recordkeeping requirements in 40 CFR Section 63.10(b)(1) have been included under the recordkeeping requirements in Condition V. O. of the permit.
- The initial compliance demonstration and semiannual compliance demonstration reporting requirements (40 CFR Sections 63.807(b) and 63.807(c)), and the reporting requirements for exceedances of baseline levels in Professional Coatings, Inc.'s Formulation Assessment Plan (40 CFR Section 63.807(e)) are included under the reporting requirements in Condition V. Q. of the permit.

9. Basis for Inapplicable Requirements

The requirements listed in Section VIII of Professional Coatings, Inc.'s Air Operating Permit do not apply to the facility, or to the specific emissions units listed in the permit for the reasons listed below. The permit shield applies to all requirements so identified.

Requirements VIII. 1 and VIII. 2

Fuel burning requirements in Puget Sound Clean Air Agency Regulation I, Section 9.08 and WAC 173-400-050 are inapplicable since Professional Coatings, Inc. does not perform any fuel burning operations. Building heat is electric.

Requirements VIII. 3, VIII. 4, VIII. 5, and VIII. 6

The opacity requirements in Regulation I, Sections 9.09(b)(1) and 9.09(b)(2), are inapplicable because the source does not (and is not required to) monitor opacity with continuous emission monitors. Similarly, Puget Sound Clean Air Agency Regulation I, Article 12 and WAC 173-400-105(5) are inapplicable since Professional Coatings, Inc. is not required to use continuous emission monitors to assure compliance.

Requirement VIII. 7

The transportation demand management plan requirement is not an applicable requirement as defined in WAC 173-401. However, since Professional Coatings, Inc. has requested that this requirement be listed as an inapplicable requirement, it is included in the list of inapplicable requirements.

Requirement VIII. 8

Puget Sound Clean Air Agency 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. This Order is inapplicable since the permit is obsolete.

In its permit application, Professional Coatings, Inc. requested that Puget Sound Clean Air Agency determine that Puget Sound Clean Air Agency Regulation II is inapplicable. After reviewing the requirements, Puget Sound Clean Air Agency has determined that Puget Sound Clean Air Agency Regulation II as a whole cannot be listed as inapplicable since each section would be evaluated individually. At the time of permit issuance, none of the specific sections in Articles 2 or 3 apply to Professional Coatings, Inc..

The application also suggested that Notice of Construction Orders of Approval (NOC) are not applicable requirements. Such Orders are applicable requirements, even if they do not include specific approval requirements. There are general requirements associated with all Puget Sound Clean Air Agency Orders of Approval that are included in the permit. However, Puget Sound Clean Air Agency has determined the third NOC approval condition in Order of Approval No. 6029, which states the approval does not relieve the owner of any requirement of any other governmental agency, is for information only and not an applicable requirement.

Finally, Professional Coatings, Inc. suggested that the stratospheric ozone protection requirements were inapplicable (40 CFR 82, RCW 70.94.970, and RCW 70.94.980). Puget Sound Clean Air Agency has determined that these requirements are applicable and included them in the Standard Terms and Conditions Section.

10. Basis for Insignificant Emission Units

The following equipment are insignificant emission units as specified in WAC 173-401-533:

Unit	Basis for IEU Designation
Solvent recovery still, 15 gallon capacity	WAC 173-401-533-2o
Propane tank, approx. 250 gallons	WAC 173-401-533-2d
Waste solvent tank, 550 gallons, average weighted vapor pressure is 71 mm Hg	WAC 173-401-533-2c
Solvent storage tank, 2000 gallons, average weighted vapor pressure is 71 mm Hg	WAC 173-401-533-2c

11. Public Comments and Responses

None at this time

12. Administrative Change

Professional Coatings Inc. purchased Girard Custom Coaters. The manufacturing facility will not change and will continue to coat wood siding, wood panels and wood furniture components. All reference to Girard Custom Coaters in the Air Operating Permit was deleted and replaced with Professional Coatings Inc.. Some inconsistencies in reporting dates were corrected.