

Statement of Basis

Moulding & Millwork Inc., Manufacturing

July 1, 2007

I. Purpose of the Statement of Basis

This document summarizes the legal and factual basis for the draft permit conditions in the Moulding & Millwork Inc., Manufacturing (Moulding & Millwork) 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 (formerly known as Puget Sound Air Pollution Control Agency (PSAPCA)) 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 Moulding & Millwork's air emissions, and provides a description of Moulding & Millwork's activities, including a short compliance history.

II. Source Description

Moulding & Millwork is a specialty wood-finisher. It receives wood products, which are molded into various patterns using woodworking equipment such as saws, molders and sanders. Particulate matter emissions from the woodworking equipment are controlled by a baghouse. The finish is then applied on a paint flat-line. At the present time, electric ovens are used for drying the finish. Natural gas ovens may be used in the future. Natural gas is now used only for building space heating, but Moulding & Millwork is considering possible use of natural gas ovens for drying.

Moulding & Millwork has the potential to emit more than 100 tons of volatile organic compounds (VOC). However, Moulding & Millwork is not a major source for hazardous air pollutants (HAP). Their HAP emissions are capped in a Puget Sound Clean Air Agency Order of Approval No. 8197 and in the AOP to ensure they do not become a major source of HAP. Should Moulding & Millwork become a major source for HAP, they would be subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for wood building materials. Of primary concern are odor and nuisance issues relating to the use of solvents and fugitive dust from the woodworking operation. Moulding & Millwork had several odor complaints when located in Kirkland and operating under the previous owners as American Millwork; however, they have not received any odor complaints nor any dust problems at the new facility location in Monroe, WA.

III. Review of Permit Application

Moulding & Millwork was an Air Operating Permit source when the facility was located in Kirkland, Washington. When the facility moved to Monroe, Washington, the air operating permit was closed for the Kirkland site. The Puget Sound Clean Air Agency Notice of

Construction Order of Approval No. 8197 authorized the construction and operation of the new operation in Monroe. The Order of Approval required Moulding & Millwork to apply for an air operating permit within 12 months of commencing operation at the new facility. Operation at the new Monroe facility commenced on June 1, 2001. The air operating permit application was received on May 31, 2002 and the Puget Sound Clean Air Agency acknowledged that the application was complete in a letter to Moulding & Millwork dated June 4, 2002.

IV. Compliance History

Within the past five years, Puget Sound Clean Air Agency has inspected Moulding & Millwork numerous times, as detailed below:

- The “old” facility in Kirkland was inspected on August 31, 2000 and August 2, 2001.
- The “new” facility in Monroe was inspected on July 25, 2001, August 14, 2002, May 7, 2003, May 6, 2004, and February 23, 2005.

The Puget Sound Clean Air Agency has taken the following enforcement actions against Moulding & Millwork’s Monroe site during the last five years:

Table 1 Enforcement Actions over the last five years

NOV/WW #	Violation Date	Issue Date	Closure Date	Reg/AOP Citation	Note
Written Warning 2-000585	8/14/2002	8/14/2002	9/30/2005	NOC Order of Approval No. 8197, Condition 6	Failure to record average VOC content of coatings within 30 days of the end of the calendar month. Corrective action was taken and the case was closed.
Written Warning 2-006775	5/6/2004	5/6/2004	5/28/2004	NOC Order of Approval No. 8197, Condition 5(d)	Failure to record total HAP emissions over previous 12-month period. Corrective action was taken and the case was closed.

V. Emission Inventory

The following table summarizes the emissions from Moulding & Millwork over the last nine years.

Table 2 Emission inventory summary

Pollutant	Tons per year								
	1996	1997	1998	1999	2000	2001	2002	2003	2004
VOC	163	192	212	232	209	*116	65	52	141
Total HAP	123	131	168	181	182	*105	2.9	2.8	0
Toluene	61	61	65	77	70	*19	0	0	0
MEK	37	39	57	73	68	*19	0	0	0

Note: *Combination of emissions from Kirkland and Monroe facilities

VI. Explanation of Applicable Requirements

A. Applicable Requirements

Moulding and Millwork is subject to all the requirements listed in Section I of the permit. Section I.A. contains the requirements that are applicable facility-wide and Section I.B. contains requirements applicable only to specific emission units. The requirements in Section I.B. only apply to the specific emission units cited; however, the requirements in Section I.A. also apply to the specific emission units or activities described in Section I.B. If the monitoring, maintenance and recordkeeping method for any requirement in Section I.A. is more extensive for specific emission units, that requirement is repeated in Section I.B. with the additional monitoring, maintenance and recordkeeping requirements.

1. Section I – Emission limits and operating requirements

Section I in Puget Sound Clean Air Agency air operating permits is set up in tabular form. Section I.A. contains the requirements that are applicable to Moulding and Millwork on a facility-wide basis. Section I.B. contains requirements applicable only to specific emission units within the facility. It should be noted here that all the requirements in Section I.A. apply to the specific emission units as well. If the monitoring, maintenance and recordkeeping method for any requirement in Section I.A. is more extensive for a specific emission unit, that requirement is repeated in Section I.B. with the additional monitoring, maintenance and recordkeeping requirements.

The tables in Section I of the air operating permit list all the local (Puget Sound Clean Air Agency), state (Department of Ecology), and federal (EPA) emission limits and emission limiting operational requirements that apply to the facility and emission units within the facility. All requirements are federally enforceable unless they are identified in column two by the words “*STATE ONLY.*”

The first column identifies the requirement. I.A.1 is the first facility-wide requirement. EU-1.5 is the fifth requirement for Emission Unit 1.

The second column contains the actual rule citation for each individual requirement. This can be a Puget Sound Clean Air Agency requirement from Regulation I, II, or III, a Washington State Department of Ecology requirement (WAC or RCW), or a federal requirement (generally a PSD permit condition or a New Source Performance Standard requirement).

The third column (Date) contains the adoption or effective date of the requirement. In some cases, the effective dates of the Federally Enforceable, or “SIP¹,” Requirement and the Non-Federally Enforceable, or “State/Local 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 yet submitted the regulation to the EPA or the EPA has not yet approved it. “*STATE ONLY*” adoption dates are in *italicized* font. When the EPA does approve the new requirement by adopting it into the SIP, the old requirement will be replaced and superseded by the new requirement. This replacement will take place automatically, with no changes being made to this permit until the permit is renewed. The new requirement will be enforceable by the EPA as well as the Puget Sound Clean Air Agency from the date that it is adopted into the SIP, and the old requirement will no longer be an applicable requirement.

The fourth (Requirement Paraphrase) column paraphrases the requirement. *The first and fourth 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 and third columns.

The fifth column (Monitoring, Maintenance & Recordkeeping Method) identifies the methods described in Section II of the permit. Following these methods is required to “reasonably assure continuous compliance” with, and is an enforceable requirement of, this air operating permit. Note that all inspections, tests, and other actions must be documented (the specific recordkeeping requirement for this is in paragraph 4 of Subsection V.O of the air operating permit).

The sixth (Emission Standard Period) column identifies the averaging time for the reference test method. The last column (Reference Test Method) identifies the reference method associated with an applicable emission limit that is to be used if and when a source test is required. In some cases where the applicable requirement does not cite a test method, one has been added.

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 and third columns, refer to the actual requirements cited.

¹ “SIP” is an abbreviation for “state implementation plan” which is a plan for improving or maintaining air quality and complying with the Federal Clean Air Act. The Federal Clean Air Act requires states to submit these plans to the US EPA for its review and approval. This plan must contain the rules and regulations of the state agency or local air authority necessary to implement the programs mandated by Federal law. Once the EPA adopts the plan or elements of it, the plan and its requirements become “federally enforceable” by EPA. New or modified state or local rules are not federally enforceable until they are “adopted into the SIP” by the EPA.

2. Section II – Monitoring methods, recordkeeping and reporting

These are the basic air operating permit requirements:

- Each air operating permit has to contain all the air quality requirements that apply to the facility.
- The permit has to describe exactly how the source would comply with each of the requirements.
- The “responsible official” for the facility has to certify “continuous compliance” with every applicable requirement.

Puget Sound Clean Air Agency air operating permits have the emissions standards and operating limits in tabular form in Section I of the air operating permit, and the monitoring methods in Section II. An air operating permit is not supposed to add any new requirements, or make any existing requirements more stringent, but sometimes “gap-filling” a monitoring method is necessary:

- All emission limits contained in EPA’s National Emission Standards for Hazardous Air Pollutants have acceptable monitoring methods built in. These may be simply placed in the air operating permit.
- PSD permits and minor new source review permits issued after the launch of the air operating program usually include monitoring methods that are designed to reasonably assure continuous compliance. Those also may be placed in the air operating permit.
- Older minor new source review permits, older federal New Source Performance Standards (NSPS), and state and local emission limits either had very little or no on-going monitoring. Special “gap-filling” monitoring methods had to be developed for these requirements, as provided under WAC 173-401-615(1)(b).

Whenever the Puget Sound Clean Air Agency uses a “gap-filling” monitoring method, we determine the monitoring frequency using criteria contained in EPA’s April 30, 1999 Draft *Periodic Monitoring Technical Reference Document*. We consider “the five criteria” in determining how often the facility should perform a monitoring activity: hourly, once per shift, daily, weekly, monthly, quarterly, annually, or once per five-year permitting period. The five criteria are:

- (1) Initial compliance. One source may have never have violated a requirement, but it still applies. The next source, however, may really have to work to stay in compliance with the requirement. Walk-around inspections for fugitive emissions should be done more frequently at a steel mill than a truck assembly facility, for example.

- (2) Margin of compliance. The monitoring method and frequency are designed so that the source will identify a problem early and take corrective action before a violation occurs. The generic opacity limit on a fabric filter control device might be 20%, but a properly maintained baghouse should not have any visible emissions at all.
- (3) Variability of process and emissions. A highly variable process may need more frequent watching than one that runs only intermittently, or one that runs continuously at an “easy” rate.
- (4) Environmental impacts of problems. More frequent inspections would be required for a process for which a maintenance problem is likely to result in emissions that would have a significant environmental impact.
- (5) Technical considerations. The facility is required to periodically inspect and perform routine maintenance on all equipment in accordance with an acceptable operation and maintenance (O&M) Plan. What technical aspects of the equipment under consideration would influence inspection frequency above and beyond O&M Plan requirements? Usually it is sufficient to operate and maintain (and monitor) equipment in accordance with manufacturer’s instructions.

The statements of basis for all original air operating permits contained analyses of “the five factors” for each monitoring requirement for which a monitoring frequency was not set in an underlying requirement.

B. Section I.A. (Facility-Wide)

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 Moulding & Millwork to determine appropriateness. The basis for each grouping and a discussion of the appropriateness of the monitoring method is provided below:

1. Requirement I.A.2 (Facility-wide emission limit)

Moulding & Millwork’s emissions have been capped by Notice of Construction Order of Approval No. 8197 in order to stay below the major source threshold for HAP. Emissions have been capped at 9.9 tons of any single HAP, 15 tons of combined HAP and 249 tons of VOC over any consecutive 12-month period. By maintaining emissions below the synthetic minor cap, Moulding & Millwork will stay out of the wood building materials NESHAP [40 CFR 63 Subpart QQQQ], and will not be a major source as defined in the PSD regulation [40 CFR 52.21]. Moulding & Millwork must maintain records over a rolling 12-month period to show compliance with the synthetic minor cap. Order of Approval No. 8197 provided specific monitoring methods to ensure limitation of HAP and VOC emissions, and these were placed in Section II.A.1(d) of the permit.

2. Requirement I.A.3 (Opacity)

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.

The monitoring method is based on quarterly visual inspections of all emission points at Moulding & Millwork, with the source taking corrective action within 24 hours or using the reference test method, WDOE Method 9A, to determine opacity if any visible emissions are noted. The Puget Sound Clean Air Agency has determined that the monitoring should be quarterly for the reasons listed below.

- (1) Initial compliance. The Puget Sound Clean Air Agency has not observed visible emissions from these activities at or above these levels during any inspection.
- (2) Margin of compliance. The monitoring method is designed so that the source will take corrective action before a violation of the underlying emission standard occurs.
- (3) Variability of process and emissions. Annual emissions from the emission units are relatively constant on an annual and daily basis. Slight changes due to area economic conditions may effect the year emissions from the facility.
- (4) Environmental impacts of problems. Particulate matter emissions are from sawing and sanding of wood. Problems with particulate controls would be more of a nuisance than a significant health hazard.
- (5) Technical considerations. Catastrophic failure of the baghouse is a likely cause of an opacity standard deviation at Moulding & Millwork. However, this unit is maintained in accordance with an acceptable O&M Plan, thereby minimizing the probability of an opacity standard violation.

3. Requirements I.A.4 and I.A.5 (PM₁₀)

Puget Sound Clean Air Agency Regulation I, Section 9.09 limits particulate emissions to 0.05 grain per dry standard cubic foot (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.

The monitoring method is based on the fact that particulate emissions less than 0.05 gr/dscf usually do not result in visible emissions and, therefore, the permit requires the same monitoring method at the same frequency as the opacity requirements in Requirement I.A.2.

4. Requirement I.A.6 (PM₁₀ from combustion sources)

WAC 173-400-050(1) limits particulate emissions to 0.1 gr/dscf corrected to 7% O₂ from all combustion units, including both internal and external combustion units. There are SIP approved, federally enforceable, and newer, non-SIP-approved, non-federally enforceable versions of WAC 173-400-050(1). Moulding & Millwork does not have any emission units to which this requirement can be applied, but it is in the I.A. Section because the requirement

applies to all industrial facilities, statewide. Therefore, this requirement does not contain additional monitoring requirements other than facility-wide monitoring discussed above.

5. Requirement I.A.7

Puget Sound Clean Air Agency Regulation I, Section 9.07 and WAC 173-400-040(6) are equivalent requirements (SO₂ emissions not to exceed 1,000 parts per million on a dry, volumetric basis²), except for the second paragraph of the WAC 173-400-040(6) which is not in the Puget Sound Clean Air Agency regulation. That paragraph, 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 SO₂ concentrations to 1,000 ppm. Since the Puget Sound Clean Air Agency rules do not allow the exception, the second paragraph does not apply to the Moulding & Millwork.

Moulding & Millwork combusts only natural gas in combustion units throughout the facility, and is incapable of violating the SO₂ limit while complying with the other requirements in the permit. The following calculations show that it is mathematically impossible for a unit to emit 1,000 ppm sulfur dioxide while burning natural gas.

Natural gas is a mixture of gaseous hydrocarbons, with at least 80 percent methane (by volume), and of pipeline quality, such as the gas sold or distributed by any utility company regulated by the Washington Utilities and Transportation Commission. Moulding & Millwork receives the same natural gas as all of the other natural gas consumers, private and industrial, in the Northwest. According to Section 1.4-3 of AP-42, natural gas contains approximately 2000 grains of sulfur per million cubic feet, which is equivalent to approximately 3.4 parts of sulfur per million cubic feet of natural gas, as shown in the following calculation:

$$\frac{2,000 \text{ gr } S}{1,000,000 \text{ ft}^3 \text{ nat. gas}} \times \frac{1 \text{ lb}}{7000 \text{ gr}} \times \frac{385 \frac{\text{ft}^3}{\text{mole } S}}{32 \frac{\text{lb}}{\text{mole } S}} = 3.44 \times 10^{-6} \frac{\text{ft}^3 S}{\text{ft}^3 \text{ nat. gas}} \equiv 3.44 \text{ ppm } S$$

According to *Perry's Chemical Engineer's Handbook*, each cubic foot of natural gas requires approximately 10 cubic feet of air for combustion, yielding approximately 11 cubic feet of combustion exhaust gases, consisting mostly of nitrogen, water vapor, and carbon dioxide. Most of the sulfur in the natural gas is converted to sulfur dioxide, with each cubic foot of sulfur producing the same volume of sulfur dioxide. Since each cubic foot of natural gas contains 3.44×10^{-6} cubic foot of sulfur, each cubic foot of stack exhaust will contain approximately:

² "ppm" means "parts per million on a dry, volumetric basis." Sometimes this is written as "ppmdv." Stack gas is usually sampled through a probe placed somewhere in the middle of the stack cross-section. The moisture is removed from the gas stream as part of the sampling process. The stack gas sample is analyzed for the pollutant in question, with the lab results being calculated as cubic feet (or cubic meters) of pollutant per million cubic feet (or cubic meters) of dry stack gas. If you had a stack with 50% moisture that was running right at the 1,000 ppm SO₂ standard, you would have 1,000 cubic feet of SO₂ for every million cubic feet of "wet" (as is) stack gas, which is 500 ppm. This is why it's important to know how stack sampling is done and why stack sampling and continuous emission monitoring methods are so specific.

$$3.44 \times 10^{-6} \frac{\text{ft}^3 \text{ S}}{\text{ft}^3 \text{ nat. gas}} \times \frac{1 \text{ ft}^3 \text{ SO}_2}{1 \text{ ft}^3 \text{ S}} \times \frac{1 \text{ ft}^3 \text{ nat. gas}}{11 \text{ ft}^3 \text{ stack exhaust}} = 3.13 \times 10^{-7} \frac{\text{ft}^3 \text{ SO}_2}{\text{ft}^3 \text{ stack exhaust}}$$

This is equivalent to 0.31 ppmdv SO₂. Note that this estimated value is less than one-tenth of one percent of the 1,000 ppm SO₂ standard. Therefore, it is reasonable to assume that combustion units that are fired on natural gas cannot exceed the 1,000 ppm SO₂ limits in Puget Sound Clean Air Agency Regulation I, Section 9.07 and WAC 173-400-040(6).

Therefore, it is reasonable to assume that the space heater exhaust, which is the only significant source of SO₂ on Moulding & Millwork, will not emit SO₂ in excess of 1,000 ppmdv.

6. Requirement I.A.8 (HCl)

Puget Sound Clean Air Agency Regulation I, Section 9.10(a) specifies that hydrochloric acid (HCl) emissions shall not exceed 100 ppm (dry), corrected to 7% O₂ for combustion sources. Because Moulding & Millwork has no sources which emit significant HCl in greater than trace amounts, Puget Sound Clean Air Agency has determined that no monitoring for HCl is required.

7. Requirements I.A.9 and 1.A.10 (nuisance)

Puget Sound Clean Air Agency Regulation I, Section 9.11(a) and WAC 173-400-040(5) are similar requirements that address emissions that may be environmentally detrimental or cause a nuisance. WAC 173-400-040(5) has SIP-approved and non-SIP approved versions that are virtually identical. Puget Sound Clean Air Agency Regulation I, Section 9.11 has not been adopted into the SIP. The monitoring method for all these requirements 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. Therefore, the Puget Sound Clean Air Agency has determined that the quarterly facility-wide inspections of Section II.A.1(b) and the complaint response requirements of 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.

Puget Sound Clean Air Agency Regulation I, Section 9.11(b) (non-Federally enforceable) and the WAC 173-400-040(4) address odors. The monitoring method is based on responding to complaints, quarterly inspections of the facility to identify emissions of odor-bearing contaminants and correcting any problems identified as a result of the inspection or investigation. Receiving complaints does not necessarily mean Moulding & Millwork is in violation of this requirement, since the regulation does not prohibit the emission of odors, but prohibits the emissions of odors if good practices are not employed to control emissions. Complaints will trigger action by Moulding & Millwork to investigate and correct problems that could result in a violation.

The Puget Sound Clean Air Agency has determined that the monitoring should be quarterly for the reasons listed below. These factors are consistent with EPA's April 30, 1999 Draft *Periodic Monitoring Technical Reference Document*.

- (6) Initial compliance. The Puget Sound Clean Air Agency has received zero complaints 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.
- (7) Margin of compliance. The monitoring method is designed so that the source will take corrective action before a violation of the underlying emission standard occurs.
- (8) Variability of process and emissions. Because the manufacturing process is relatively constant, it is unlikely that the variability of the process itself will be the cause of emissions leading to environmentally detrimental problems or be the cause of nuisances while the plant is normally operating.
- (9) Environmental impacts of problems. A maintenance problem is unlikely to result in emissions that would have a significant environmental impact.
- (10) Technical considerations. Moulding & Millwork will be required to maintain all equipment in accordance with an O&M Plan. All significant equipment will be covered in that O&M Plan. The O&M Plan will require that all significant equipment be operated and maintained in accordance with manufacturer recommendations, which should minimize emissions due to wear and neglect. Quarterly visual inspections of plant operations by environmental personnel will provide for quality assurance of the O&M Plan, and allow for checking of insignificant emission units.

8. Requirements I.A.11 & 12 (fugitive emission standards)

WAC 173-400-040(3) addresses fugitive dust emissions for some activities, and WAC 173-400-040(8) requires reasonable precautions or reasonably available control technology (RACT) to control fugitive emissions. Puget Sound Clean Air Agency Regulation I, Section 9.15 requires the use of reasonable precautions for fugitive dust and lists some examples of reasonable precautions. Monitoring, maintenance and recordkeeping methods II.A.1(b) (Facility-wide Inspections) and II.A.1(c) (Complaint Response) are sufficient to monitor for changes that would cause a fugitive emission or unexpected buildup of dust on the roadways and parking lots.

9. Requirement I.A.13 (maintain equipment)

Puget Sound Clean Air Agency Regulation I, Section 9.20 requires Moulding & Millwork 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.A 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. 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.

10. Requirements I.A.14 and 15 (O&M plan)

In accordance with Puget Sound Clean Air Agency Regulation I, Section 7.09(b), Moulding & Millwork is required to develop and implement an 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, 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 may include, but are not limited to, 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 Fibre Co. v. DOE*, 89, Wn. App. 627 (1998), which held that similar wording was not vague and gave sufficient notice of the prohibited conduct. Puget Sound Clean Air Agency Regulation I, Section 7.09(b) also requires Moulding & Millwork 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 Moulding & Millwork 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 working hours. For many insignificant emission units and equipment not listed in the permit, the meaning of "promptly" will vary 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 Moulding & Millwork is following good industrial practice.

Moulding & Millwork must report to the Puget Sound Clean Air Agency any instances where it failed to promptly repair any defective equipment. Moulding & Millwork has the right to claim certain problems were a result of an emergency (Section V.R) or unavoidable (Section V.S).

Following these requirements demonstrates that Moulding & Millwork 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.

11. Requirement I.A.16

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.

C. Section I.B. (Emission Unit Applicable Requirements)

Section I.B. of the permit lists applicable requirements that are specific to an emission unit or activity. The Generally Applicable Requirements of Section I.A. apply to all the emission units listed in Section I.B and are not repeated in this section. Monitoring Methods and Reference Methods are also identified if they are different from, or in addition to, those listed in Section I.A.

The EPA incorporates what the EPA has determined to be “all necessary monitoring” into all recently adopted federal air pollution regulations. Where a recently adopted federal regulation does not identify a monitoring method, the permit does not identify one either, except in some cases where the Puget Sound Clean Air Agency has determined additional monitoring to be necessary. Finally, any requirements that are inapplicable to the specific emission unit are also listed in this section.

All generally applicable requirements apply to the specific emission units. To simplify the permit, the Puget Sound Clean Air Agency did not repeat these requirements for each unit unless a specific monitoring requirement applied. Federally enforceable requirements that are specific to the operations are listed.

Order of Approval No. 8197 (approved September 28, 2000) limits the HAP, VOC and PM₁₀ emissions from the emission units listed in the operating permit. Actual emissions limits are in Requirement I.A.2 of the requirements tables in Section I.A. of the permit, while monitoring requirements are in Section II of the permit.

1. Emission Unit 1 (EU-1) FINISHING LINE – Flow Coating application stations

Order of Approval No. 8197 also limits VOC content of the coatings to 3.5 pounds per gallon as applied. This limit is considered to be BACT for coating used by Moulding & Millwork. Order of Approval No. 8197 provided specific monitoring methods to ensure limitation of VOC content of coatings, and these were placed in Section II.A.1(d) of the permit.

Moulding & Millwork coating application methods on the flow coating line were limited to the use of flow coaters, dip coat, brush coat, hand held aerosol cans, roller coat, or air brush. Local fire departments, Labor and Industries, and Puget Sound Clean Air Agency require closed coating containers as best management practices for all coating operations. Order of Approval No. 8197 provided specific monitoring methods to ensure use of specified coating techniques and best management practices, and these were placed in Section II.A.2 of the permit.

Regulation I Section 9.20(a) is a requirement specific to the finishing line, because it has been approved under Puget Sound Clean Air Agency Regulation I, Article 6. Air emissions from this operation are vented through vertical stacks to reduce the impact of toxic emissions and odors from the facility. Therefore, assuring the room ventilation system is in good working order is an integral part of the finishing-line operations. Moulding & Millwork uses a differential pressure gauge to monitor air pressure to ensure there is negative pressure in the building. The

monitoring methods in Section II.A.2 of the permit also provide reasonable assurance of continuous compliance with Puget Sound Clean Air Agency Regulation I, Section 9.20(a).

Moulding & Millwork could, at some time in the future, file a Notice of Construction to install a different type of coating line that might use another type of coating method. The coating restrictions that apply to the flow coating line would not necessarily apply to the new line.

2. Emission Unit 2 (EU-2) Dust Collector

Puget Sound Clean Air Agency Regulation I Section 9.20(a) is a requirement specific to the dust collector, because it has been approved under Puget Sound Clean Air Agency Regulation I, Article 6. Puget Sound Clean Air Agency issued Order of Approval No. 8197 for the cyclone dust collector requiring emissions to meet 0.01 gr/dscf. Both of these requirements are in Section I of the permit.

Monitoring requirements for this emission unit are in Section II.A.3 of the permit. Order of Approval No. 8197 requires Moulding & Millwork to use a differential pressure gauge to determine if the baghouse is operating within an acceptable range. Moulding & Millwork is required to determine the acceptable range for the gauge and clearly mark the ranges. The baghouse, however, is relatively new and may build up a more substantial dust cake on the bags over time or the residual drag in the fabric filter may change as the fabric ages. Therefore, the acceptable range is relatively broad.

VII. Monitoring, Maintenance and Recordkeeping Procedures

Moulding & Millwork must follow the procedures contained in Section II of the permit, Monitoring and Recordkeeping Methods. Failure to follow a requirement in Section II may not necessarily be a violation of the underlying applicable emission standard in Section I, but it is a violation of Section II, and is therefore reportable as a “deviation.” Moulding & Millwork must report all such deviations, as well as violations or deviations from any other permit condition, as a deviation under Section V.Q.1 of the permit. In addition, all information collected as a result of implementing Section II can be used as credible evidence under Section V.N.2 of the permit. Reporting a permit deviation and taking corrective action does not relieve Moulding & Millwork from its obligation to comply with the underlying applicable requirement.

VIII. Deviations

“Deviation” means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or recordkeeping required by the air operating permit. For a situation lasting more than 24 hours which constitutes a deviation, each 24 hour period is considered a separate deviation. Included in the meaning of deviation are any of the following situations:

- Emissions exceed an emission limitation or standard;

- Process or emissions control device parameter values indicate that an emission limitation or standard has not been met;
- Observations or data collected demonstrates noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit; or
- An exceedance or an excursion, as defined in 40 CFR 64, occurs.

IX. Standard Approval Conditions

A standard Puget Sound Clean Air Agency Notice of Construction Order of Approval condition, Condition No. 1, requires that the equipment, device or process be installed according to plans and specifications submitted to the Puget Sound Clean Air Agency. Once the equipment is installed, the Puget Sound Clean Air Agency requires certification by the applicant that the installation was installed as approved; this is usually done with a Notice of Completion. Normally within six months to a year after receiving a Notice of Completion, a Puget Sound Clean Air Agency inspector verifies by inspection that the equipment was installed as specified and in accordance with the Order of Approval. While the Notice of Completion is a one-time requirement that Moulding & Millwork has complied with, Moulding & Millwork cannot change the approved equipment in such a manner that requires an NOC Order of Approval without first obtaining an NOC Order of Approval which is addressed in Section IV.A of the permit.

X. Prohibited Activities

Some of the requirements Moulding & Millwork identified in the operating permit application are included in Section III as prohibited activities. The Puget Sound Clean Air Agency has listed these activities in this section to highlight that they cannot occur at the facility. Since these activities are prohibited, routine monitoring of parameters is not appropriate; however, the permit does require Moulding & Millwork to look for such activities during a routine facility-wide inspection.

Puget Sound Clean Air Agency Regulation I, Section 9.13 and WAC 173-400-040(7) contain similar requirements addressing concealment and masking of emissions. Although both requirements apply, the permit language has been simplified by grouping these requirements together.

XI. Activities Requiring Additional Approval

Some of the requirements Moulding & Millwork identified in the operating permit application are included in Section IV as activities that require additional approval. For new source review, the permit language has been simplified. 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. All these requirements apply, but the language in these requirements has been incorporated into one section to simplify the permit language.

XII. Standard Terms and Conditions

Some of the requirements Moulding & Millwork identified in the operating permit application are included in Section V, Standard Terms and Conditions. This provided an easier mechanism for describing requirements that are more general in nature. This section also contains the standard terms and conditions specifically listed in WAC 173-401-620.

Section V.Q.1 of the permit requires Moulding & Millwork to report deviations of the permit to the Puget Sound Clean Air Agency, normally within 30 days after the end of the month during which the deviation was discovered. Section V.Q.2 of the permit requires that a responsible official certify all required reports at least once every six months. Moulding & Millwork may submit the certification with a deviation report or certify all the reports submitted in the previous six months. For example, if Moulding & Millwork detected a deviation in January, it must report the deviation to Puget Sound Clean Air Agency no later than 30 days after January 31st which would be the first couple of days in March, depending on how many days there were in February. A responsible official must certify the report according to WAC 173-401-520 at the time the report is submitted or any other time within six months of submitting the report.

If Moulding & Millwork does not detect any deviations to report for a six-month period, then Moulding & Millwork is required to report that there were no deviations during the six-month period.

XIII. Inapplicable Requirements

Moulding & Millwork's Title V application identified Puget Sound Clean Air Agency Regulation I, Sections 9.09(b)(1), 9.09(b)(2), Regulation II, Regulation III, and Chapter 173-490 WAC. In addition, several Department of Ecology ambient air quality standards were listed as not applying to Moulding & Millwork. These requirements were removed from the Inapplicable Requirements table for several reasons:

- For the purposes of the Puget Sound Clean Air Agency, Moulding & Millwork is required to comply with the requirements that are in the air operating permit. Moulding & Millwork is not required to comply with the thousands of requirements that are not in the air operating permit.
- If a requirement is called out as inapplicable in the air operating permit, and then later on Moulding & Millwork wants to install a new process that needs that requirement, the air operating permit has to be changed in a significant modification process before that change can be made. This takes a long time and is relatively expensive. If the requirement is not called out as inapplicable, the equipment can be installed as an "off-permit change." Off permit changes are brought into the permit the next time the permit is renewed.
- A better use of the Inapplicable Requirement section is to list a requirement that *looks* like it *might* apply at first glance, but there is some special reason why it doesn't apply. A perfect example of this is the 40 CFR 63 Subpart QQQQ, the NESHAP for wood building materials.

This does not apply because Moulding & Millwork has taken a “synthetic minor” limit on HAP emissions.

XIV. Insignificant Emission Units

WAC 173-401-530 contains criteria for identifying insignificant emission units or activities for purposes of the operating permit program. Designation of an emission unit or activity as insignificant for purposes of this chapter does not exempt the unit or activity from any applicable requirement. An emission unit or activity is insignificant based on one or more of the following approaches:

(a) Actual emissions of all regulated air pollutants from a unit or activity are less than the emission thresholds established in subsection (4) of WAC 173-401-530. Such emission units and activities must be listed in the permit application;

(b) The emission unit or activity is listed in WAC [173-401-532](#) as categorically exempt. Such emission units or activities do not have to be listed in the permit application;

(c) The emission unit or activity is listed in WAC [173-401-533](#) and is considered insignificant if its size or production rate based on maximum rated capacity is below the specified level. These emission units or activities must be listed in the permit application.

(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of of WAC 173-401-530. These units or activities must be listed on the permit application.

Moulding & Millwork identified several items of equipment that qualify as insignificant due to capacity below the specified levels in WAC 173-401-533. These items of equipment were listed as insignificant emission units in Section IX of the AOP. Monitoring requirements for insignificant emission units are detailed in Section II.B.2 of the AOP. In essence, Moulding & Millwork will be required to use good industrial practices to maintain insignificant emission units, and to promptly repair defective equipment or shut down the unit until defective equipment can be repaired. Moulding & Millwork won't have to keep records of maintenance of insignificant emission units except when such equipment is inspected and a problem requiring prompt repair is discovered during a quarterly plant-wide inspection.

XV. Permit Shield

The permit shield applies to all requirements contained in Sections I through VI of the permit, including monitoring, maintenance, recordkeeping, and reporting requirements.

XVI. Public Comments and Responses

A. Comments to Air Operating Permit

Comments were received from the applicant. Numerous changes to the AOP and SOB were requested. The requested changes and our responses to those requested changes are given below:

COMMENTS TO THE DRAFT MOULDING & MILLWORK INC., MANUFACTURING AIR OPERATING PERMIT (Dated December 22, 2006)

1. THROUGHOUT PERMIT: In the Requirement paraphrase please add a period at the end of the sentence where it is missing in the following conditions:
I.A.3, I.A.5, I.A.7, I.A.8, I.A.9, I.A.10, I.A.12(a)(4), I.A.13, I.A.14, and I.A.15.

Puget Sound Clean Air Agency Response:

Changes made.

2. Page 6 of 42, I.A.7, Requirement Paraphrase: The superscript “2” at the end of the sentence belongs at the end of the requirement paraphrase in I.A.6 (which addresses combustion and incineration units).

Puget Sound Clean Air Agency Response:

Change made.

3. Page 12, II.A.1(b), second paragraph: Please change “correct” to “initiate corrective action for.”

Puget Sound Clean Air Agency Response:

Change not made. The origination of this specific language was determined in special collaboration with the EPA and should say “take corrective action”.

4. Page 13, II.A.1(c)(5), second sentence: Please change “correct the problem as soon as possible but no later than within 24 hours” with “initiate corrective action for the problem as soon as possible but no later than within 24 working hours.”

The addition of “initiate corrective action for” is important because depending on the problem that needs correcting, the corrective action may take longer than 24 hours. The addition of “working” is important because if a problem occurs late on a Friday afternoon and no work is scheduled for the weekend then most likely corrective action will not occur until after the weekend is over. This also brings the requirement in line with II.A.1(a) and (b), II.A.2 and II.A.3 which already utilize “working hours.”

Puget Sound Clean Air Agency Response:

Change not made. It has been determined that the use of “Working” hours is not consistent with the purpose of this language and will not be added.

5. Page 14, II.A.1(e): This requirement “Maintenance and Repair of Insignificant Emission Units” seems redundant to II.B.2, “Maintenance and repair of insignificant emission units.” It is confusing having both requirements in the monitoring section. A review of other air operating permits that have recently been in public comment shows that typically only one “Maintenance and Repair of Insignificant Emission Units” requirement is included in a permit. Please consolidate II.A.1(e) and II.B.2 to make the permit less confusing.

Puget Sound Clean Air Agency Response:

Change made.

6. Page 14, II.A.2: Moulding & Millwork requests that a Data Recovery clarification statement be added after the “once each day” portion of this condition. Moulding & Millwork requests the following be added: “Moulding & Millwork shall recover valid daily monitoring data for at least 90% of the days that the finishing line is operated.”

The basis for this request follows: Section V.O(4) (page 26) requires that Moulding & Millwork shall document all inspections required by Section II.A. Then Section V.P (page 27) addresses data recovery and states that “Moulding & Millwork shall recover valid monitoring and recordkeeping data for each parameter according to any specific monitoring and recordkeeping requirements identified in Section II of this permit. However, if such requirements are silent on data recovery provisions, data recovery is assumed to be 100%.”

WAC 173-401-615(1)(b), 10/17/2002, is cited as the underlying requirement. Please review WAC 173-401-615(1)(b). It does not require 100% data recovery. What is required is “periodic monitoring sufficient to yield reliable data from the relevant time period that are representative of the source’s compliance with the permit...” The dictionary definition of “representative” is “serving as a typical or characteristic example.” Clearly, something less than 100% data recovery is adequate to meet the intent of “reliable data...that are representative of the source’s compliance” for a daily recordkeeping requirement.

Data recovery of at least 90 percent is more than adequate to ensure compliance with the permit’s daily recordkeeping, inspection, and monitoring requirements. A requirement for 100 percent data recovery of daily recordkeeping would unnecessarily place an undue hardship on the plant.

Puget Sound Clean Air Agency Response:

Change was not made. The finishing line monitoring frequency has been set at once per day that the finishing line is operated. Moulding and Millwork will probably be inspecting the production aspects of the finishing line at least that frequently, without undue hardship.

7. Page 14, II.A.2(1): EU-1.1 should instead be EU-1.2.

Puget Sound Clean Air Agency Response:

Change made.

8. Page 14, II.A.2(1) and II.A.2(2): Please change the formatting to be consistent with that already established in Section II. Thus II.A.2(1) should be II.A.2(a) and II.A.2(2) should be II.A.2(b).

Puget Sound Clean Air Agency Response:

Numerals were changed to bullets.

9. Page 14, II.A.2, last paragraph (begins with “Moulding & Millwork shall correct...”):

Moulding & Millwork assumes this paragraph is supposed to be specific only to requirement II.A.2 partly because of its placement at the end of II.A.2 and also because the other activity based monitoring requirements in Section II.A each have their own specific corrective action clauses (see the end of II.A.1(a), (b), and (c)). Therefore the words “that cause or are likely to cause violations of any of the terms or conditions of this permit” should be deleted. Also Moulding & Millwork requests that “correct” be replaced with “initiate corrective action for”. Thus the revised paragraph, first sentence is proposed to read, “Moulding & Millwork shall initiate corrective action for problems that may cause a violation of II.A.2 as soon as possible, but not later than within 24 working hours of the initial observation.”

Puget Sound Clean Air Agency Response:

Change made. Corrective actions are now specific to EU-1.

10. Page 15, II.A.3(1), (2), and (3): Please revise the formatting to be consistent with the rest of II.A. Thus (1), (2), and (3) become (a), (b), and (c) respectively.

Puget Sound Clean Air Agency Response:

Numerals were changed to bullets.

11. Page 15, II.A.3, last paragraph: Moulding & Millwork requests that a Data Recovery clarification statement be added after the last paragraph. Moulding & Millwork requests the following be added: “Moulding & Millwork shall recover valid daily monitoring data for at least 90% of the days that the dust collection system is operated.”

The basis for this request follows: Section V.P (page 27) addresses data recovery and states that “Moulding & Millwork shall recover valid monitoring and recordkeeping data for each parameter according to any specific monitoring and recordkeeping requirements identified in Section II of this permit. However, if such requirements are silent on data recovery provisions, data recovery is assumed to be 100%.”

WAC 173-401-615(1)(b), 10/17/2002, is cited as the underlying requirement. Please review WAC 173-401-615(1)(b). It does not require 100% data recovery. What is required is “periodic monitoring sufficient to yield reliable data from the relevant time period that are representative of the source’s compliance with the permit...” The dictionary definition of “representative” is “serving as a typical or characteristic example.” Clearly, something less than 100% data recovery is adequate to meet the intent of “reliable data...that are representative of the source’s compliance” for a daily recordkeeping requirement.

Data recovery of at least 90 percent is more than adequate to ensure compliance with the permit's daily recordkeeping, inspection, and monitoring requirements. A requirement for 100 percent data recovery of daily recordkeeping would unnecessarily place an undue hardship on the plant.

Puget Sound Clean Air Agency Response:

Change was not made. The baghouse monitoring frequency has been set at once per day that the woodworking equipment is operated. Moulding and Millwork will probably be inspecting the production aspects of the woodworking equipment at least that frequently, without undue hardship.

12. Page 15, II.B.1(1), (2), (3), (4), (5), and (6): Please change (1) through (6) to (a) through (f).

Puget Sound Clean Air Agency Response:

Numerals were changed to bullets.

13. Page 17, III.B: Please change the second set of (1) and (2) to (3) and (4). It is confusing having 2 sets of III.B(1) and (2).

Puget Sound Clean Air Agency Response:

Numerals were changed to bullets.

14. Page 18, III.E: Please change "Millowrk" to "Millwork."

Puget Sound Clean Air Agency Response:

Change made.

15. Page 18, III.E, citation at the end: 9.13(a) should be changed to 9.13(b), which is the "Masking" regulation.

Puget Sound Clean Air Agency Response:

Change made.

16. Page 24, V.M and

Page 28, V.Q.2 and

Page 29, V.Q.5: Moulding & Millwork requests that the annual certification period begin with the date of issuance of the Air Operating Permit (and thus ending 1 year later).

Puget Sound Clean Air Agency Response:

Change made.

17. Page 24, V.N.1(a), second sentence: Please change "conduct" to "conducts."

Puget Sound Clean Air Agency Response:

Change made.

18. Page 25, V.N.1(a), 2nd paragraph beginning with Moulding & Millwork: For clarification please add "Reference Test Method" before "compliance test." Then the sentence will read, "Moulding & Millwork shall notify the Puget Sound Clean Air Agency in writing at least 21 days prior to any Reference Test Method compliance test."

Puget Sound Clean Air Agency Response:

Change not made. Moulding and Millwork will need to notify the Agency in writing at least 21 days prior to *any* compliance test. The preceding paragraph states: "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." The wording in the AOP follows this wording very closely. The first paragraph in Section V.N.1(a) indicates that the testing being done is for the purpose of determining compliance with emission standards.

19. Page 25, V.N.1(a), 4th paragraph beginning with Moulding & Millwork: For clarification please add "Reference Test Method" before "compliance test." Then the sentence will read, "Moulding & Millwork, if required by the Puget Sound Clean Air Agency to perform a Reference Test Method compliance test..."

Puget Sound Clean Air Agency Response:

Change not made. See previous response.

20. Page 25, V.N.1(a), end of 2nd paragraph: Please remove the extra period at the end of the sentence.

Puget Sound Clean Air Agency Response:

Change made.

21. Page 26, V.O(4) first sentence: Please change "~~required by the O&M Plan and Section II.A~~" to "required by Section II.A and II.B". The basis for this change is because Section II.B.1, last sentence, excludes from the permit those O&M Plan provisions that are not required by Section II.A. Also, Section V.P (Data recovery) states that Moulding & Millwork shall recover recordkeeping data for each parameter according to any specific recordkeeping requirements identified in Section II of the permit. (It does not state that Moulding & Millwork shall also recover recordkeeping data for each parameter that Moulding & Millwork may include in its O&M Plan).

Therefore V.O(4) needs to be further clarified so it is clear that recordkeeping is not required by the AOP for sections of the O&M Plan that are NOT required by Section II.A of the permit. Moulding & Millwork is committed to maintaining its equipment in good working order and typically conducts monitoring and maintenance that is above and beyond the requirements in Section II.A of the permit. However Moulding & Millwork strongly believes that Title V recordkeeping (and possible resultant reporting) requirements should NOT be imposed on the extraneous monitoring and maintenance that is performed. This would cause an undue burden.

Puget Sound Clean Air Agency Response:

Change made.

22. Page 26, V.O(4): Moulding & Millwork may begin keeping records in electronic format. Therefore it will be difficult to meet the requirements of the last sentence, "All such records shall be signed and dated." The first sentence of this requirement already requires that "Moulding & Millwork document all inspections ... including who conducted the inspection...and the date....". Therefore Moulding & Millwork requests that the last sentence that requires a

redundant signature and date be deleted and replaced with “Records may be maintained in electronic format.”

Puget Sound Clean Air Agency Response:

The sentence requiring a signature has been deleted. Section V.O.(4) still requires records be made of who conducted the inspection. There is nothing anywhere in the AOP to prevent Moulding and Millwork from maintaining records in electronic format.

23. Page 41, VIII: Moulding & Millwork requests that 40 CFR 63 Subpart A be included as an inapplicable requirement. The reason is the same as for 40 CFR 63 Subpart QQQQ which is that Moulding & Millwork has taken a federally enforceable permit (see PSCAA Order of Approval 8197 dated September 28, 2000) that limits the plantwide emissions of HAP to less than major source levels. Therefore Moulding & Millwork is not subject to the requirements of 40 CFR 63 Subpart A.

Puget Sound Clean Air Agency Response:

Change made.

24. Page 41, IX, row 3 of the Table: There is a typo, gAs should be spelled gas.

Puget Sound Clean Air Agency Response:

Change made.

COMMENTS TO THE DRAFT
MOULDING & MILLWORK INC., MANUFACTURING
STATEMENT OF BASIS
(Dated December 22, 2006)

1. Page 1, I, second line: Please remove the comma after Millwork. The correct spelling of the name is “Moulding & Millwork Inc., Manufacturing.”

Puget Sound Clean Air Agency Response:
Change made.

2. Page 1, II, seventh sentence: Please delete the first ‘for’.

Puget Sound Clean Air Agency Response:
Change made.

3. Page 1, II, second paragraph, last sentence: “complains” should instead be “complaints.”

Puget Sound Clean Air Agency Response:
Change made.

4. Page 1, II, second paragraph, last sentence: After the word “Kirkland” please add the following: “and operating under the previous owners as American Millwork.”

Puget Sound Clean Air Agency Response:
Change made.

5. Page 4, VI.A.1, fourth paragraph, last sentence: V.P should instead be “V.O.”

Puget Sound Clean Air Agency Response:
Change made.

6. Page 6, VI.B.1, fourth sentence: “periods” should be “period.”

Puget Sound Clean Air Agency Response:
Change made.

7. Page 7, VI.B.4: Please remove the space before the 6.

Puget Sound Clean Air Agency Response:
Change made.

8. Page 10, VI.B.8, third sentence: II.A.1(b) should be II.A.1(c). Also II.A.1(c) should be II.A.1(b).

Puget Sound Clean Air Agency Response:
Change made.

9. Page 11, VI.B.11: The requirement I.A.15 should instead be “I.A.16.”

Puget Sound Clean Air Agency Response:

Change made.

10. Page 12, VI.C, fourth paragraph: September 27 should instead be “September 28.”

Puget Sound Clean Air Agency Response:

Change made.

11. Page 12, VI.C, last sentence: Actual emissions limits are also located in I.A.2 so please add to the sentence.

Puget Sound Clean Air Agency Response:

Change made.

12. Page 12, VII: This should be renumbered as “1” because it is part of VI.C. Also then renumber the following roman numerals.

Puget Sound Clean Air Agency Response:

Change made.

13. Page 12, fifth paragraph: Section II.A.2 should instead be “Section II.A.1(d)”.

Puget Sound Clean Air Agency Response:

Change made.

14. Page 12, sixth paragraph, first sentence: Please place a comma after “cans” and also after “roller coat.”

Puget Sound Clean Air Agency Response:

Change made.

15. Page 12, sixth paragraph, second sentence: Please delete this sentence (“These coating applications minimize the overspray from spray coating.”) Moulding & Millwork utilizes flow coating on its flow coating line (which is what the sixth paragraph refers to) and flow coating does not involve any spray coating.

Puget Sound Clean Air Agency Response:

Change made.

16. Page 13, second line: Because this discussion is in regards to the finishing line, then II.A.3 should instead be “II.A.2.”

Puget Sound Clean Air Agency Response:

Change made.

17. Page 13, 1. Emission Unit 2 (EU-2) Dust Collector: The number “1” should instead be number “2.”

Puget Sound Clean Air Agency Response:

Change made.

18. Page 13, Dust Collector, second paragraph: Section II.A.4 should instead be Section “II.A.3.”

Puget Sound Clean Air Agency Response:
Change made.

19. Page 16, XIV(d): “as defined in subsection (2) of this section” is confusing. What or where is this subsection?

Puget Sound Clean Air Agency Response:
“as defined in subsection (2) of this section” was changed to “as defined in subsection (2) of WAC 173-401-530)”