



Southwest Clean Air Agency

11815 NE 99th Street, Suite 1294 • Vancouver, WA 98682-2322

(360) 574-3058 • Fax: (360) 576-0925

www.swcleanair.org

December 10, 2015

Ms. Denise Tront
Trobella Cabinetry, Inc.
3201 NW Lower River Road, Unit D
Vancouver, WA 98660

Subject: Final Air Discharge Permit for a Cabinetry Manufacturing Facility

Dear Ms. Tront:

A final determination to issue Air Discharge Permit 15-3166 has been completed for Air Discharge Permit Application CL-2061 pursuant to Section 400-110(4) of the General Regulations for Air Pollution Sources of the Southwest Clean Air Agency (SWCAA). Public notice for ADP Application CL-2061 was published in the permit section of SWCAA's internet website on November 4, 2015. SWCAA did not receive a request for a public comment period in response to the public notice, and has concluded that significant public interest does not exist for this determination. Therefore, a public comment period will not be provided for this permitting action. Electronic copies of Air Discharge Permit 15-3166 and the associated Technical Support Document are available for public review in the permit section of SWCAA's internet website (www.swcleanair.org/permitsfinal.html). Original copies are enclosed for your files.

This Air Discharge Permit may be appealed directly to the Pollution Control Hearings Board (PCHB) at P.O. Box 40903, Olympia, Washington 98504-0903 within 30 days of receipt as provided in RCW 43.21B.

If you have any comments, or desire additional information, please contact me or Vanessa McClelland at (360) 574-3058, extension 129.

Sincerely,

Uri Papish
Executive Director

UP: vm
Enclosure



SOUTHWEST CLEAN AIR AGENCY


**AIR DISCHARGE PERMIT
15-3166**

Issued: December 10, 2015

Facility Name: Trobella Cabinetry, Inc.
Physical Location: 3201 NW Lower River Road, Unit D
Vancouver, WA 98660

SWCAA ID: 2410

REVIEWED BY:


Paul T. Mairose, Chief Engineer



APPROVED BY:


Uri Papish, Executive Director

TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
1. Equipment/Activity Identification	1
2. Approval Conditions	1
2.1 Emission Limits	1
2.2 Operating Limits and Requirements	2
2.3 Monitoring and Recordkeeping Requirements	3
2.4 Emission Monitoring and Testing Requirements	3
2.5 Reporting Requirements	4
3. General Provisions	5

1. Equipment/Activity Identification

ID No.	Generating Equipment/Activity	# of Units	Control Measure/Equipment	# of Units
1	Spray Booth (Col-Met)	1	High transfer efficiency spray equipment and particulate filters	N/A
2	Spray Booth (Cefla Prima)	1	High transfer efficiency spray equipment and particulate filters	N/A
3	Mixing Room (Merchant Manufacturing)	1	Particulate filters	N/A
4	Space Heaters	3	Low Sulfur Fuel (Natural Gas)	N/A

2. Approval Conditions

The following tables detail the specific requirements of this permit. In addition to the requirements listed below, equipment at this facility may be subject to other federal, state, and local regulations. The permit requirement number is identified in the left hand column. The text of the permit requirement is contained in the middle column. The emission unit, equipment, or activity to which the permit requirement applies is listed in the right hand column.

ADP 15-3166 supersedes ADP 12-3028 in its entirety.

2.1 Emission Limits

No.	Emission Limits	Equipment/Activity								
1.	Volatile organic compound emissions from spray coating and painting operations must not exceed 10.0 tons per year. Annual emissions must be calculated based on actual material consumption and material balance methodology consistent with Section 6 of the Technical Support Document for this Permit.	1 - 3								
2.	Facilitywide emissions of toxic air pollutants must not exceed the applicable small quantity emission rate (SQER) identified in WAC 173-460 as in effect August 21, 1998. Combined toxic air pollutant emissions must not cause the volatile organic compound emission limit to be exceeded.	1 - 4								
3.	Emissions from the space heaters must not exceed: <table border="0" style="margin-left: 20px;"> <tr> <td><u>Pollutant</u></td> <td><u>Emission Limit</u></td> </tr> <tr> <td>Nitrogen Oxides</td> <td>0.65 tpy ; 0.15 lb/hr</td> </tr> <tr> <td>Carbon Monoxide</td> <td>0.54 tpy ; 0.12 lb/hr</td> </tr> <tr> <td>PM/PM₁₀/ PM_{2.5}</td> <td>0.05 tpy ; 0.01 lb/hr</td> </tr> </table> <p>Annual emissions must be calculated using the methodology consistent with Section 6 of the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	Nitrogen Oxides	0.65 tpy ; 0.15 lb/hr	Carbon Monoxide	0.54 tpy ; 0.12 lb/hr	PM/PM ₁₀ / PM _{2.5}	0.05 tpy ; 0.01 lb/hr	4
<u>Pollutant</u>	<u>Emission Limit</u>									
Nitrogen Oxides	0.65 tpy ; 0.15 lb/hr									
Carbon Monoxide	0.54 tpy ; 0.12 lb/hr									
PM/PM ₁₀ / PM _{2.5}	0.05 tpy ; 0.01 lb/hr									

No.	Emission Limits	Equipment/ Activity
4.	Visible emissions from approved equipment must not exceed zero percent opacity for more than 3 minutes in any one hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).	1 - 4

2.2 Operating Limits and Requirements

No.	Operating Limits and Requirements	Equipment/ Activity
5.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facilitywide
6.	Operations that cause or contribute to a nuisance odor must use recognized good practice and procedures to reduce these odors to a reasonable minimum.	Facilitywide
7.	Each pollution control device must be operated whenever the processing equipment served by that control device is in operation. Control devices must be operated and maintained in accordance with the manufacturer's specifications. Furthermore, control devices must be operated in a manner that minimizes emissions.	1 - 3
8.	Emission units identified in this Permit must be maintained and operated in total and continuous conformity with the conditions identified in this Permit. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this Permit, including directing the facility to cease operations until corrective action can be completed.	1 - 4
9.	All containers for VOC containing materials must be kept securely closed with a lid in place except when in active use. Open containers for storage, transfer or disposal of VOC containing materials are prohibited. In addition, all VOC containing materials used to clean and/or flush spray equipment or lines during clean up must be collected and stored in a closed container.	Facilitywide
10.	Exhaust air from approved equipment must be discharged vertically into the ambient air above the level of the building roof. Any device that obstructs or prevents vertical discharge is prohibited.	1 - 3
11.	Spray booth doors must remain closed during spray coating operations.	1 - 2
12.	Differential pressure gauges must be installed and maintained on the spray booths to measure differential pressure across the exhaust filter media.	1 - 2
13.	The spray booths must be fitted with particulate matter filters on the exhaust that are demonstrated to achieve 98 percent capture of paint overspray.	1 - 2
14.	All spray coating must be performed with properly operating high transfer efficiency spray equipment including, but not limited to, spray guns with HVLP or air-assisted airless configurations.	1 - 2

2.3 Monitoring and Recordkeeping Requirements

No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity
15.	Each record required by this Permit must include the date and the name of the person making the record entry. If a control device or process is not operating during a specific time period, a record must be made to that effect.	1 - 4
16.	All records required by this Permit must be kept for a minimum period of no less than three years in a form readily available for inspection by SWCAA representatives.	1 - 4
17.	<p>The following information must be collected, recorded at the intervals specified below, and readily available on-site for inspection:</p> <ul style="list-style-type: none"> (a) Coating and solvent consumption must be recorded for each calendar year. The Permittee may (is not required to) assume that consumables were used during the year purchased; (b) MSDS and/or chemical constituent information must be maintained on-site for each coating or solvent used at the facility; (c) The quantity and type of hazardous waste disposed of must be recorded for each calendar year; (d) The differential pressure across the exhaust filtration media of the spray booths must be recorded weekly while in operation. If the spray booths are not operated during that week, that fact must be noted in the log instead of a pressure reading; (e) Spray booth filter changes and other maintenance activities that may affect emissions must be recorded for each occurrence; (f) The total amount of natural gas consumed by the space heaters must be recorded for each calendar year. Total natural gas usage by the facility may be recorded in lieu of natural gas usage by the space heaters; (g) Upset conditions that cause excess emissions must be recorded for each occurrence; (h) All air quality related complaints, including odor complaints, received by the permittee and the results of any subsequent investigation or corrective action must be recorded for each occurrence; and (i) Air emissions of criteria air pollutants, volatile organic compounds, and each toxic air pollutant must be recorded for each calendar year. 	1 - 4

2.4 Emission Monitoring and Testing Requirements

None

2.5 Reporting Requirements

No.	Reporting Requirements	Equipment/ Activity
18.	<p>SWCAA must be notified at least seven days in advance of the use of any new coating or finishing material in excess of five (5) gallons per year that will result in emissions of toxic or hazardous air pollutants not listed in section 6 of the technical support document for this Permit. The written notice must include the following:</p> <ul style="list-style-type: none"> (a) A description of the proposed change(s) in materials with an MSDS for each new material; (b) The date the change(s) is (are) to be made; (c) The change(s) in emissions of VOC, HAP and TAP compounds occurring as a result of the change; and (d) A summary of any applicable requirement(s) that would apply as a result of the change(s). <p>If the proposed emission rate of a new TAP exceeds an applicable SQER and/or the VOC limit established by this Permit or otherwise circumvents an applicable requirement including those established by this Permit, New Source Review shall be required prior to making the proposed change.</p>	Facilitywide
19.	All air quality related complaints, including odor complaints, received by the permittee must be reported to SWCAA within three days of receipt.	Facilitywide
20.	<p>Excess emissions must be reported to SWCAA as follows:</p> <ul style="list-style-type: none"> (a) As soon as possible, but no later than 12 hours after discovery for emissions that represent a potential threat to human health or safety; (b) As soon as possible, but no later than 48 hours after discovery for emissions which the permittee wishes to claim as unavoidable pursuant to SWCAA 400-107(1); and (c) No later than 30 days after the end of the month of discovery for all other excess emissions. 	Facilitywide
21.	Deviations from permit conditions must be reported no later than 30 days after the end of the month during which the deviation is discovered.	Facilitywide
22.	<p>The following emission-related information must be reported to SWCAA by March 15th for the previous calendar year:</p> <ul style="list-style-type: none"> (a) The quantity of each coating and solvent consumed. The Permittee may (is not required to) assume that consumables were used during the year purchased; (b) The quantity and type of hazardous waste disposed of; (c) The quantity of natural gas consumed by the space heaters. If only facilitywide natural gas consumption is available, this value may be reported in lieu of space heater fuel consumption; and (d) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs). 	Facilitywide
23.	The permittee must notify SWCAA in writing within ten (10) days after completing initial installation of new equipment. This will allow proper inspections and observations to be conducted for the new equipment.	2 - 4

3. General Provisions

No.	General Provisions
A.	The equipment and activities specified in ADP Application CL-2061 must be maintained and operated in total and continuous conformity with the conditions identified in this Permit. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this Permit, including directing the facility to cease operations until corrective action can be completed.
B.	For the purpose of ensuring compliance with this Permit, duly authorized representatives of the Southwest Clean Air Agency must be permitted access to the permittee's premises and the facilities being constructed, owned, operated and/or maintained by the permittee for the purpose of inspecting said facilities. These inspections are required to determine the status of compliance with this Permit and applicable regulations and to perform or require such tests as may be deemed necessary.
C.	The provisions, terms and conditions of this Permit must be deemed to bind the permittee, its officers, directors, agents, servants, employees, successors and assigns, and all persons, firms, and corporations acting under or for the permittee.
D.	The requirements of this Permit shall survive any transfer of ownership of the source or any portion thereof.
E.	This Permit must be posted conspicuously at or be readily available near the source.
F.	Approval to construct or modify specific pollution generating equipment must become invalid if construction is not commenced within eighteen months after the date of issuance of this Permit, if construction is discontinued for a period of eighteen months or more, or if construction is not completed within a reasonable time.
G.	This Permit does not supersede requirements of other Agencies with jurisdiction and further, this Permit does not relieve the permittee of any requirements of any other governmental Agency. In addition to this Permit, the permittee may be required to obtain permits or approvals from other agencies with jurisdiction.
H.	Compliance with the terms of this Permit does not relieve the permittee from the responsibility of compliance with SWCAA General Regulations for Air Pollution Sources, previously issued Regulatory Orders, RCW 70.94, Title 173 WAC or any other applicable emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply.
I.	If any provision of this Permit is held to be invalid, all unaffected provisions of the Permit shall remain in effect and be enforceable.
J.	No change in this Permit must be made or be effective except as may be specifically set forth by written order of the Southwest Clean Air Agency upon written application by the permittee for the relief sought.
K.	The Southwest Clean Air Agency may, in accordance with RCW 70.94 impose such conditions as are reasonably necessary to assure the maintenance of compliance with the terms of this Permit, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act.



Southwest Clean Air Agency

11815 NE 99th Street, Suite 1294 • Vancouver, WA 98682-2322

(360) 574-3058 • Fax: (360) 576-0925

www.swcleanair.org

State Environmental Policy Act

DETERMINATION OF NONSIGNIFICANCE (DNS) – SWCAA 15-034

Description of proposal:

ADP Application CL-2061: The proponent has applied for a permit to install and operate new spray coating equipment as well as a new make-up air unit and two infrared space heaters. The new equipment will produce emissions of nitrogen oxides, carbon monoxide, volatile organic compounds and toxic air pollutants. At the emission levels proposed, this equipment will not have a significant adverse impact on ambient air quality. This permitting action is not expected to have any effect on traffic, noise, glare, housing, or recreation opportunities.

Proponent:

Trobella Cabinetry – (Denise Tront)

Location of proposal, including street address if any:

3201 D NW Lower River Road
Vancouver, WA 98660

Lead agency: Southwest Clean Air Agency

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

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

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

Position/title: Chief Engineer

Address: Southwest Clean Air Agency
11815 NE 99th Street, STE 1294
Vancouver, WA 98682-2454

Phone: (360) 574-3058 ext. 130

Signature: Paul T. Mairose

Date: 12/10/15

