



YAKIMA REGIONAL CLEAN AIR AGENCY

Order of Approval No. NSRP-13-AM-15

New Source Review (NSR) Order of Approval for Alexandria Moulding, Inc. for Hot Mix Glue Tank, a Duspohl Saw, Grizzly Dust Collector (Model G1029Z2P), Shrink Wrap Line (excel packaging model INT-20-2, excel packaging model PP2212-72) and a Dado Saw.

IN THE MATTER OF approving a project which establishes a new air contaminant source at Alexandria Moulding, Inc. in Moxee, WA, **THIS ORDER OF APPROVAL IS HEREBY ISSUED TO:**

Applicant/Permittee: Alexandria Moulding, Inc.
Wood Molding Manufacturing

Located at: 101 Grant Way
Moxee, WA 98936

Contact: Alexandria Moulding, Inc.
Mike Hall, Maintenance Supervisor
P.O. Box 169
Moxee, WA 98936
(509) 248-2120

IN COMPLIANCE WITH THE PROVISIONS OF THE STATE OF WASHINGTON CLEAN AIR ACT (Revised Code of Washington (RCW)) CHAPTER 70.94.152, WASHINGTON ADMINISTRATIVE CODE (WAC) 173-400-110 and WAC 173-460-040:

ISSUE DATE: July 6, 2015

THIS ORDER OF APPROVAL PERMIT IS SUBJECT TO THE FOLLOWING CONDITIONS:

Construction/Installation of the equipment must be conducted in compliance with all data and specifications submitted with the New Source Review (NSR) application under which this Order of Approval is issued unless otherwise specified herein. The conditions and limitations of this NSR Order of Approval are attached as follows:



Findings of Fact

- 1.1 Alexandria Moulding, Inc., hereafter referred to as the Permittee, the Facility or the Source, located at 101 Grant Way, in Moxee, Washington is the owner and operator of a manufacturing facility producing raw and primed wood moldings.
- 1.2 The Permittee is proposing to install a hot mix glue tank, a Duspohl saw, a grizzly dust collector (Model G1029Z2P), a shrink wrap line (excel packaging model INT-20-2, excel packaging model PP2212-72) and a Dado saw. The floor plan of the Facility is shown in Figure 1.
- 1.3 The layout and specifications of the aforementioned equipment and operations are part of this New Source Review (NSR) provided by the Permittee. City of Moxee exempted this project from the State Environment Policy Act (SEPA) process on June 24th, 2015.
- 1.4 Air emissions from this operation are in the form of small Particulate Matter (PM_{2.5} and PM₁₀) and Volatile Organic Compound (VOC) some of which are Toxic Air Pollutants (TAPs) and or Hazardous Air Pollutants (HAPs).

2.0 Determinations

In relation to the above, YRCAA determines that the source must comply with the federal, state, and local laws and regulations including but not limited to the following determination:

- 2.1 The Facility is located in an area that is in attainment with all criteria pollutants;
- 2.2 The Facility is not a major stationary source nor is this modification is subject to the Prevention of Significant Deterioration permitting requirements of WAC 173-400-700 through 173-400-750; and
- 2.3 The Facility is subject to the Registration Program of WAC 173-400-099 and YRCAA Regulation 1, Subsection 4.02;



THEREFORE, it is hereby ordered that the project as described above, in the NSR application, and in detailed plans, specifications and other information submitted in reference thereto, is **APPROVED** for operation, **PROVIDED** the specification submitted with the application and the following conditions are met:

3.0 Operating Conditions

3.1 This Order authorizes the installation and operation of the following equipment:

Table 1: Authorized Equipment List

Unit Type	Description
Dust Collector	Grizzly Model G1029Z2P, 2 HP, 1550 cfm;
Traveling Saw	Duspohl 7 to 8 ft lengths of molding
Hot Mix Glue Tank	Jowat Hot Melt Glue
Wrap line	Excel Packaging Model INT-20-2 and PP2212-72
Dado Saw	In-house built, to cut 3.5" x 3.5" x 1" in a 4" x 4" x 8' post.

3.2 Best Available Control Technology (BACT) and BACT for Toxic (T-BACT) shall be satisfied for any proposed new facility or modified air emission source to control air emissions in accordance with RCW 70.94.152, WAC 173-400-113 and WAC 173-460-060. The following actions and conditions satisfy BACT and T-BACT requirements:

3.2.1 Developing, maintaining and implementing an Operation and Maintenance (O&M) plan for the dust collectors and fabric filters including appropriate training for all operators;

3.2.2 Grizzly 2 HP Dust Collector particulate emissions of less than or equal to 0.01 gr/dscf and shall be operated in accordance with the O&M plan. The bags shall be maintained all the times and have at least a monthly regular maintenance;

3.2.3 The TAPs air emissions from this Facility shall always be below the ASIL at the boundary of the facility at all the times

3.3 The O&M plan must be updated within 60 days after the issuance of this Order.

3.4 The Permittee must conduct visible emission inspections of the facility at least once per calendar quarter. Inspections are to be performed while the facility is in operation during



daylight hours. If during a quarterly visible emissions inspection visible emissions other than uncombined water are observed from a single unit or activity, the Permittee must as soon as practicable but within 24 hours of the initial observation:

- 3.4.1 Take corrective action, which may include shutting down the unit or activity until it can be repaired, and until there are no visible emissions (or until the unit or activity is demonstrated to be in compliance with all applicable opacity limitations in the permit using the reference test method); or
 - 3.4.2 Alternatively, determine the opacity using the reference test method. If visible emissions are observed from a fabric filters, check to make sure that the fabric filter is operated and maintained properly and either shut it down within 3 hours or observe visible emissions using 40 CFR Part 60 Appendix A, Method 9 within 48 hours. All observations using the opacity reference test method must be kept on-site and made available to YRCAA staff during inspection or upon request.
- 3.5 There must be no fallout or any fugitive emissions from the dust collector or painting beyond the property boundary in a quantity that interferes unreasonably with the use and enjoyment of the property owner upon which the material is deposited or is detrimental to the health, safety or welfare of any person or causes damage to any property or business.

4.0 General Conditions

- 4.1 Installation and operation of this equipment must comply with all applicable federal, state and local laws and regulations, including, but not limited to, RCW 70.94, WAC 173-400 (General Regulations for Air Pollution Sources), WAC 173-460 (Controls for New Sources of Toxic Air Pollutants), and YRCAA Regulation 1.
- 4.2 All plans, specifications, other information and any further authorizations, approvals or denials in relation to this project, shall be incorporated herein and made a part of YRCAA records.
- 4.3 The YRCAA staff shall be allowed to enter this Facility at reasonable times to inspect equipment and records specific to the control, recovery, or release of contaminants into the atmosphere, in accordance with RCW 70.94.200 and YRCAA Regulation 1, 2.01.
- 4.4 Nothing in this approval shall be construed as preventing compliance with any requirement(s) of law, including those imposed pursuant to the Washington Clean Air Act, and rules and regulations thereunder.
- 4.5 This Order (NSRP-13-AM-15) may be modified, suspended or revoked in whole or part for cause including, but not limited to, the following:



- 4.5.1 Violation of any terms or conditions of this authorization; or
- 4.5.2 If this authorization has been obtained by misrepresentation or failure to disclose fully all relevant facts.
- 4.6 The provisions of this authorization are severable and, if any provision of this authorization, or application of any provisions of this authorization to any circumstance, is held invalid, the application of such provision to their circumstances, and the remainder of this authorization, shall not be affected thereby.
- 4.7 Failure to comply with any of these conditions is a violation subject to penalties in accordance with RCW 70.94.430 and 431, and YRCAA Regulation 1, Article 5, Section 5.02.
- 4.8 The requirements of this Order apply to the Facility owner, operator(s), and any contractor or subcontractor performing any activity authorized under this permit. Any person(s), including contractor(s) and subcontractor(s), not in compliance with any of the applicable Order requirements are in violation and may be subject to appropriate civil or criminal penalties. The Facility owner, operator, and all contractor(s) or subcontractor(s) are liable for the actions and violations of their employee(s). Any violation committed by a contractor or subcontractor shall be considered a violation by the Facility owner or operator, and the contractor or any subcontractor(s).
- 4.9 Applicable laws and regulations may be superseded or revised without notice. It is the Permittee's responsibility to stay current with the changes governing their business and therefore the Permittee must comply with all new laws and regulations immediately upon their effective date. Laws and regulation updates will be incorporated into existing Orders or upon renewal of said Orders of Approval.
- 4.10 Prior to modifying the operation, installing new equipment or changing the quantity set forth in Appendix A of this Order, another NSR application must be filed with YRCAA and an Order must be issued.

5.0 Emission Limits

- 5.1 The maximum allowable emissions of these pollutants are listed in Appendix A and are based on provisional usage from the Facility and submitted Material Safety Data Sheets (MSDS) for all materials used in this operation and the corresponding VOC, TAPs and HAPs.



- 5.2 The Permittee, in addition to the above limits, must comply with all applicable requirements of the general standards for maximum emissions in accordance with WAC 173-400-040.

6.0 Monitoring, Recordkeeping and Reporting Requirements

- 6.1 The Permittee shall keep all records including this Order on site. Records shall include, at a minimum, the material throughput, the monthly number of hours of operation for the Grizzly, the O&M items performed, the date and time of maintenance performed, and the operator's name. Forms for record keeping must be designed by the Permittee.
- 6.2 All records including this Order, logs and a copy of the O&M plan must be kept on site and be readily available, organized and accessible when requested by YRCAA or during an inspection. The O&M plan must be updated to reflect any changes in operating procedures and such changes must be routinely implemented.
- 6.3 Records required by this Order must be maintained and kept at the site for any of the previous three years from any current date at minimum.
- 6.4 Maintain on-site documentation of incoming raw materials, paints, solvents or any materials that contribute to HAP, TAP and VOC emissions, including the delivery date, name, batch or lot number and quantity. Material Safety Data Sheets (MSDS) of all such materials must be maintained on-site and readily accessible when requested by YRCAA.
- 6.5 Total emissions for criteria pollutants, HAPs, TAPs and VOCs must be calculated and reported to YRCAA on an annual basis as specified in the annual registration provided by YRCAA to the Facility.
- 6.6 This Order and its conditions shall remain in effect in the event of any change in control or ownership of the Facility. In the event of any such change in control or ownership, the Permittee must notify the succeeding owner of the Order and conditions and shall notify the YRCAA of the change in control or ownership by filing an "Ownership or Name Change" form within fifteen (15) days of that change. The form can be obtained or requested from YRCAA's office.



Any person feeling aggrieved by this NSR Order may obtain review thereof by application, within thirty (30) days of receipt of this NSR Order to the Pollution Control Hearings Board, P.O. Box 40903, Olympia, WA, 98504-0903. Concurrently, a copy of the application must be sent to the YRCAA, 329 North 1st Street, Yakima, WA 98901. These procedures are consistent with the provisions of RCW Chapter 43.21B and the rules and regulations adopted thereunder.

DATED at Yakima, Washington this July 6, 2015.

PREPARED BY:

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Mylene Gueneron
Engineer/Planner
Yakima Regional Clean Air Agency

APPROVED BY:

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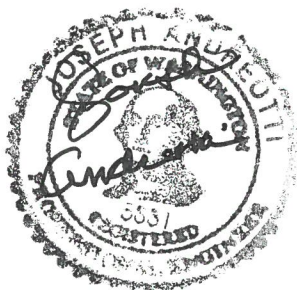
Hasan M. Tahat, Ph.D.
Engineering and Planning Division Supervisor
Yakima Regional Clean Air Agency
for

Gary W. Pruitt
Air pollution Control Officer
Yakima Regional Clean Air Agency

REVIEWED BY:

A handwritten signature in black ink, appearing to read "Joseph Andreotti", written over a horizontal line.

Joseph Andreotti, P.E.,
Andreotti and Associates



7/20/15

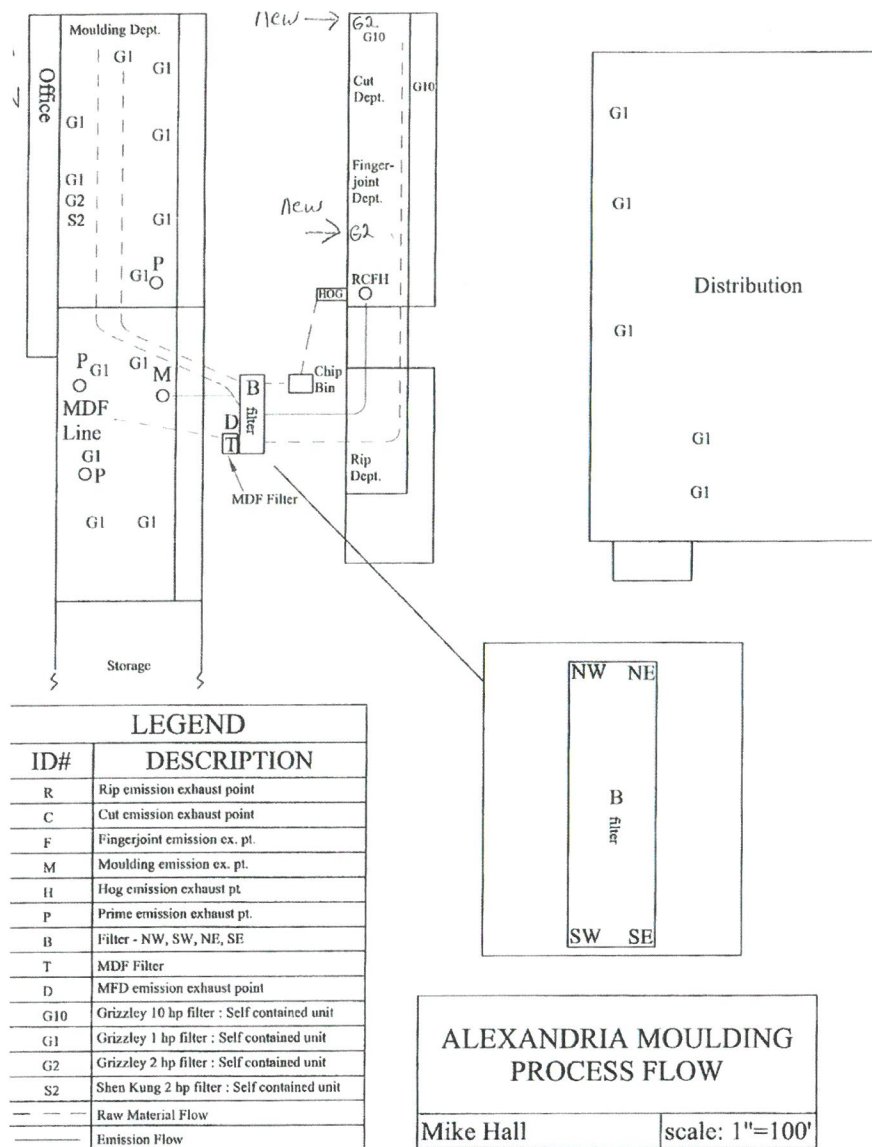


Figure 1: Facility Floor Plan

APPENDIX A
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Alexandria Moulding
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Pollutant	CAS #	24-hr PTE (lb/day)	Annual PTE (lb/yr)	Annual PTE (tpy)	Averaging Period	Exemption Level / De Minimis (lb/averaging period)	SQER (lb / averaging period)	ASIL (µg/m3)	Below Exemption Level / De Minimis?	Below SQER?
PM	---	0.06	21	0.01	Year	2500	-	-	Yes	N/A
PM10	---	0.03	9	4.62E-03	Year	1500	-	-	Yes	N/A
PM2.5	---	0.00470	1.71491	8.57E-04	Year	1000	-	-	Yes	N/A
Total VOC	---	9.10E-02	33	1.66E-02	Year	4000	-	-	Yes	N/A
Acetaldehyde	75-07-0	3.41E-04	0.12	6.23E-05	Year	3.55	71	0.37	Yes	N/A
Acetic Acid	64-19-7	1.93E-03	0.71	3.53E-04	-	-	-	-	N/A	N/A
Acetone	67-64-1	9.10E-04	0.33	1.66E-04	-	-	-	-	N/A	N/A
Acrolein	107-02-8	2.27E-04	0.08	4.15E-05	24-hr	0.000394	0.00789	0.06	Yes	N/A
Acrylic Acid	79-10-7	2.27E-04	0.08	4.15E-05	24-hr	0.00657	0.131	1	Yes	N/A
Ethane	74-84-0	2.27E-04	0.08	4.15E-05	-	-	-	-	N/A	N/A
Ethylene	74-85-1	1.14E-04	0.04	2.08E-05	-	-	-	-	N/A	N/A
Formaldehyde	50-00-0	1.02E-03	0.37	1.87E-04	Year	1.6	32	0.167	Yes	N/A
Formic Acid	64-18-6	1.93E-03	0.71	3.53E-04	-	-	-	-	N/A	N/A
Methyl Ethyl Ketone	78-93-3	2.27E-04	0.08	4.15E-05	24-hr	32.9	657	5000	Yes	N/A
Propionaldehyde	123-38-6	2.27E-04	0.08	4.15E-05	-	-	-	-	N/A	N/A
Propylene	115-07-1	1.14E-04	0.04	2.08E-05	24-hr	19.7	394	3000	Yes	N/A
Vinyl acetate	108-05-4	2.31	844	4.22E-01	24-hr	1.31	26.3	200	No	Yes

Vinyl Wrapper usage:
max hot glue usage

4 kg/hr

Shrink Tunnel usage:
Maximum production rate

474 lb/hr

Dado Machine usage:
Reported sawdust waste stream

100 gal/mo