

**Statement of Basis for  
Mutual Materials Company – Newcastle Brick Plant  
AOP Renewal 1  
May 8, 2007**

## **I. PURPOSE OF THIS STATEMENT OF BASIS**

### ***A. General***

This document summarizes the legal and factual basis for the permit conditions in Mutual Materials Company's Newcastle Brick Plant (Mutual Materials) air operating permit to be issued under the authority of the Washington Clean Air Act, Chapter 70.94 Revised Code of Washington, Chapter 173-401 of the Washington Administrative Code and Puget Sound Clean Air Agency Regulation I, Article 7. Unlike the permit, this document is not legally enforceable. It includes references to the applicable statutory or regulatory provisions that relate to Mutual Materials emissions to the atmosphere. In addition, this statement of basis provides a description of Mutual Materials activities and a compliance history.

### ***B. Renewal 1***

This document also describes the first renewal to the Mutual Materials air operating permit (to run for the five year period beginning from the renewal permit issuance, briefly on page 3 and in greater detail on page 20).

## **II. SOURCE DESCRIPTION**

Mutual Materials Company's Newcastle Brick Plant (Mutual Materials) is located within the city limits of Newcastle, King County. The original plant included the Dressler kiln and the grinding operations and was constructed about 1950 on a 50-acre remote wooded site with no close population centers. The Keller kiln started about 1970 and had minor changes to the cool-down section of the kiln in 1980 that did not increase emissions or facility capacity.

Mutual Materials manufactures high-fired ceramic brick units in a variety of sizes, shapes, and natural colors. These bricks are made from naturally occurring clay and shale from the local region primarily from the top of Cougar Mountain. Surface clay and shale are mined in open pits and stockpiled at the plant site.

During the kiln firing of the bricks, Mutual Materials emits a significant amount (30 tons in 1997 and 29 tons in 1998) of hydrogen fluoride (HF), one of EPA's listed HAPs. This compound is found naturally in raw clay materials used in brick manufacturing and is released to the atmosphere at the higher temperatures in the kiln. Puget Sound Clean Air Agency's major emission concerns from the facility are the hydrogen fluoride emissions and possible fugitive dust emissions.

Raw clay is stored primarily under large open-walled sheds with minor amounts stored in open piles. Front-end loaders are used to mix the raw clays in the storage sheds. The mixed clays are crushed, ground, and screened in the building adjacent to the storage sheds. The process of extrusion, wet brick setting, drying, firing and packaging takes place next to the clay grinding building. The finished bricks are stored under open-sided sheds with some storage in the open on asphalt and unpaved areas. The main parking lot is paved with asphalt.

There are two extruding machines and off-loading lines at Mutual Materials. The Dressler kiln and dryer are substantially dismantled; however, they are still on Puget Sound Clean Air Agency's equipment listing. Significant modifications and additions of new equipment would be required to make the Dressler kiln operational and, therefore, would likely require the submittal of a Notice of Construction Application for Approval. Only the Keller kiln and dryer are operational. There are two unloading and packaging areas.

The manufacture of brick involves mining, grinding, screening and blending of the raw materials and the forming, cutting, shaping, drying and firing of the final products. The final brick colors and physical properties are a function of the types of clay mixtures and the firing temperatures in the kiln. About 10% recycled brick is added to the "mix" as filler. The filler is called "grog" which is composed of excess manufactured product or rejected (due to color or size) brick.

The mix of clay and grog is crushed and ground in a "dry pan crusher" and finally sent to the forming process where clay is mixed with water in a pug mill. Mutual Materials uses the stiff mud forming process. Sufficient water is added to give the clay plasticity (i.e., slick and moldable) and bricks are formed by forcing the clay through a die. Wire is used in separating the clay into individual units or bricks.

Wet clay units (either stiff mud or dry pressed) that have been formed are dried in the dryer to less than 1% moisture content before firing in the Keller kiln. The drying is done by using waste heat from the hot brick in the kiln as it nears the exit of the kiln (not the hot exhaust gases themselves). Both kilns are tunnel kilns. The Keller kiln can operate at a maximum capacity of 12.5 cars per day (CPD). Each Keller brick car holds 7,000 brick equivalents (BEs) (about 15 tons). The dismantled Dressler kiln, if operated, was designed to operate at a maximum capacity of 36 CPD. Each Dressler brick car could hold 2,400 BEs (about 5 tons).

Natural gas is used to heat the brick. The maximum temperature when the Dressler kiln is operating is about 1,950 degrees F and the maximum temperature in the Keller kiln is about 2,050 degrees F.

The raw materials used are clay and water. Some finished brick requires a small amount of manganese or chromium to be added to the clay mix to darken the brick color. Many of the clays require the addition of a small amount of barium carbonate to reduce staining by soluble salts that may form in the drying process. A lubricant is used at the extruder to maintain a flow of clay through the die.

Mutual Materials' grinding schedule is two eight-hour shifts, five days per week. The extruding schedule is two eight-hour shifts, five days per week. The firing schedule for the Keller kiln is 24 hours per day, 7 days per week and 52 weeks per year. The kiln is only shut down for repairs on very rare occasions.

Particulate dust from Mutual Materials' yard is a potential source of fugitive emissions. Mutual Materials needs an aggressive fugitive dust control plan for continually educating and training its employees and truck drivers to recognize and initiate control measures defined by the plant to meet Regulation I, Section 9.15. To help sources meet the requirements of Regulation I, Section 9.15, Regulation I, Section 7.09(b) requires a detailed Operation and Maintenance (O&M) Plan to be developed and reviewed and updated annually by Mutual Materials.

Mutual Materials manufactures brick from clay and thereby moves tons of dry fine powdery material, which is a very high potential for fugitive dust emissions. Since 1993, during inspections some dry surface dust has been observed throughout the plant including the raw material storage areas and the finished brick storage yard areas. Since 1993, during unannounced inspections by the Puget Sound Clean Air Agency, there has been an increased awareness of fugitive dust potential by the facility and enhanced measures have been employed to continue to address the constant problem of managing the potential dust emissions from all the brick powder throughout the plant.

### **III. REVIEW OF PERMIT APPLICATION**

#### ***A. Original Permit***

An air operating permit application was received by the Puget Sound Clean Air Agency from Mutual Materials on June 7, 1995. On July 28, 1995, the Puget Sound Clean Air Agency issued written notification to Mutual Materials that the application was complete. The final operating permit was issued on March 21, 2000.

#### ***B. Modifications during the first permitting period***

On September 10, 2001 Mutual Materials requested correction of a typographical error as an administrative amendment. The error was in the description of the Keller Kiln; it had inadvertently been labeled the "Keller Dryer" in the AOP, it was corrected in an administrative amendment on October 3, 2001.

#### ***C. Renewal 1***

On April 12, 2005 Mutual Materials submitted a Title V renewal application for the New Castle facility. The application consisted of a cover letter and critical items required under WAC 173-401-710, such as a compliance plan and certification by the responsible official. On April 12, 2005 the Puget Sound Clean Air Agency sent a letter to Mutual Materials indicating that the

renewal application had been found to be complete. No substantive changes to the permit were requested by Mutual Materials or made by the Puget Sound Clean Air Agency, but numerous small items were changed, and those changes are described in detail beginning on page 19. Although the original permit had an expiration date of March 21, 2005, it continued to be in effect as a result of a complete renewal application on file with this Agency. The permit continuation was a part of the original permit terms (Section VI.A(2)).

#### **IV. COMPLIANCE HISTORY**

Within the past five years, Puget Sound Clean Air Agency has performed unannounced inspections at Mutual Materials eight times; on September 19, 2000, August 21, 2001, August 13, 2002, August 12, 2003, July 28, 2004, May 18, 2005, August 17, 2005, and July 12, 2006:

The Puget Sound Clean Air Agency has taken the following enforcement actions against Mutual Material's Newcastle facility during the last five years:

**Table 1 Enforcement Actions over the last five years**

NOV/WW #	Violation & Issue Dates	Closure Date	Reg/AOP Citation	Note
Written Warning 2-000471	8/11/2001 10/30/2001	10/30/2001	AOP 11568, EU-1.3; Order of Approval 6837, Condition 8	Failure to maintain stack temp > 435 °F, self-reported in AOP semi-annual report. Corrective action was described in same report. Matter was closed in Written Warning.
Notice of Violation 3-001708	8/13/2002 9/17/2002	2/21/2003	AOP 11568, EU-1.3; Order of Approval 6837, Condition 8 and V.Q.2	Failure to maintain stack temp > 435 °F, and failure to submit deviation report. Mutual Materials submitted letter on 9/23/2002 which described corrective action. Agency issued Civil Penalty 9576 on 1/29/2003. Civil penalty paid on 2/11/03.
Notice of Violation 3-001716	10/2/2002 11/21/2002	2/21/2003	Reg I, 7.05; AOP 11568, EU-1.3	Failure to maintain stack temp > 435 °F. Agency issued Civil Penalty 9577 on 1/29/2003. Civil penalty paid on 2/11/03.
Notice of Violation 3-001173	3/22/2004 5/23/2005	10/19/2005	Reg I, 7.05; AOP 11568, VI.A.1	Failure to submit complete and timely AOP renewal application. Operation without AOP coverage. Source sent complete AOP renewal application and Agency issued Civil Penalty 9921 on 7/22/2005 and acknowledged receipt of renewal application on 10/19/2005. Civil penalty paid on 10/13/05.
Written Warning 2-006781	7/28/2004 7/28/2004	8/31/2004	AOP 11568, IV.O.4	No records of quarterly facility-wide inspections available during inspection. Mutual Materials found reports and submitted them to Agency on 7/29/2004.

## V. EMISSION INVENTORY

The emissions at this facility come primarily from the Keller kiln stack, although the greatest source of potential emissions is fugitive dust from the material storage yard and traffic areas. EPA emission factors are used for NO<sub>x</sub>, SO<sub>2</sub>, PM<sub>10</sub>, VOC, and CO. The emissions of hydrogen fluoride were measured by source tests conducted March 21, 1994 and April 22, 1994.

**Table 2 Emissions Inventory, tons per year**

<b>Pollutant</b>	<b>2004</b>	<b>2003</b>	<b>2002</b>	<b>2001</b>	<b>2000</b>
Volatile organic compounds (VOC)	1	1	<0.5	1	1
Hydrogen fluoride (HF)	26	21	20	25	26
Carbon monoxide (CO)	31	25	24	30	40
Oxides of nitrogen (NO <sub>x</sub> )	9	7	7	9	19
Particulate matter (PM)	22	18	18	22	23
Fine particulate matter (PM <sub>10</sub> )	4	4	3	4	5
Sulfur dioxide (SO <sub>2</sub> )	17	4	13	17	18
Total toxic air contaminants (TAC)	26	21	20	25	26
Total hazardous air pollutants (HAP)	26	21	20	25	26

## **VI. EXPANATION OF APPLICABLE REQUIREMENTS**

### ***A. Applicable Requirements in Section I of the AOP***

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 Mutual Materials 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 “SIP,” Requirement and the Non-Federally Enforceable, or “State/Local Only,” Requirement are different because either the state has not yet submitted the regulation to the EPA for approval into the State Implementation Plan (SIP) or the EPA has not yet approved it. “*STATE ONLY*” adoption dates are in *italicized* font. When the EPA does approve the new requirement 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.

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*“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.*

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.

### ***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 Mutual Materials 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 (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 Mutual Materials, 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 a building's heating unit, baghouse or spray booths is a likely cause of an opacity standard deviation at Mutual Materials. However, these units are maintained in accordance with an acceptable O&M Plan, thereby minimizing the probability of an opacity standard violation.

## **2. Requirements I.A.3 and I.A.4 (PM<sub>10</sub>)**

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.

## **3. Requirement I.A. 5 (PM<sub>10</sub> from combustion sources)**

WAC 173-400-050(1) limits particulate emissions to 0.1 gr/dscf corrected to 7% O<sub>2</sub> 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). Mutual Materials 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.

## **4. Requirement I.A.6**

Puget Sound Clean Air Agency Regulation I, Section 9.07 and WAC 173-400-040(6) are equivalent requirements (SO<sub>2</sub> emissions not to exceed 1,000 parts per million on a dry, volumetric basis), 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 SO<sub>2</sub> 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 Mutual Materials.

Mutual Materials combusts only natural gas in combustion units throughout the rest of the facility, and is incapable of violating the SO<sub>2</sub> limit while complying with the other requirements in the permit. The following calculations show that it is mathematically impossible for a unit to

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*“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 SO<sub>2</sub> standard, you would have 1,000 cubic feet of SO<sub>2</sub> for every million cubic feet of dry stack gas. You would also have 1,000 cubic foot of SO<sub>2</sub> for every two 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.*

emit 1,000 ppm sulfur dioxide while burning natural gas. Therefore, no additional monitoring, other than the fuel sulfur-content monitoring procedure in Section II.A.2.e, is required.

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. Mutual Materials 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:

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

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. The 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  $3.44 \times 10^{-6}$  cubic foot of sulfur, each cubic foot of stack exhaust will contain approximately:

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

This is equivalent to 0.31 ppmdv SO<sub>2</sub>. Note that this estimated value is less than one-tenth of one percent of the 1,000 ppm SO<sub>2</sub> standard. Therefore, it is reasonable to assume that combustion units that are fired on natural gas cannot exceed the 1,000 ppm SO<sub>2</sub> 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 SO<sub>2</sub> on Mutual Materials, will not emit SO<sub>2</sub> in excess of 1,000 ppmdv if the boilers burn only natural gas or very low sulfur oil.

## 5. Requirement I.A. 7 (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% O<sub>2</sub> for combustion sources. Because Mutual Materials 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.

## 6. Requirements I.A.8 and 1.A. 9 (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 complaint response requirements in Section II.A.1(b) and the quarterly facility-wide inspections required in Section II.A.1(c) of the permit are sufficient to monitor for changes that would cause a fugitive emission or unexpected buildup of dust on the roadways and plant grounds.

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, monthly 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 Mutual Materials 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 Mutual Materials 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*.

- (1) 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.
- (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. 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.
- (4) Environmental impacts of problems. A maintenance problem is unlikely to result in emissions that would have a significant environmental impact.

- (5) Technical considerations. Mutual Materials 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.

### **7. Requirement I.A.12 (maintain equipment)**

Puget Sound Clean Air Agency Regulation I, Section 9.20 requires Mutual Materials 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.

### **8. Requirements I.A.13 and 14 (O&M plan)**

In accordance with Puget Sound Clean Air Agency Regulation I, Section 7.09(b), Mutual Materials 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 Mutual Materials 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 Mutual Materials has a reasonable possibility of violating or that a violation would cause an air quality problem, the Puget Sound Clean Air Agency added clarification that "promptly" usually means within 24 hours. For many insignificant emission

units and equipment not listed in the permit, 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 Mutual Materials is following good industrial practice.

Mutual Materials must report to the Puget Sound Clean Air Agency any instances where it failed to promptly repair any defective equipment. Mutual Materials 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 Mutual Materials 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.

## **9. Requirement I.A.15**

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 27, 2000) limits the HAP, VOC and PM<sub>10</sub> emissions from the emission units listed in the operating permit. Actual emissions limits are in the requirements tables in Section I.B. of the permit, while monitoring requirements are in Section II of the permit.

## **1. Emission Unit 1 (EU-1) Finishing Line**

Mutual Materials'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, Mutual Materials will stay out of the wood building materials NESHAP [40 CFR 63 Subpart QQQ]. Mutual Materials must maintain records over a rolling 12-month periods to show compliance with synthetic. 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.2 of the permit.

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 Mutual Materials. 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.2 of the permit.

Mutual Materials coating application methods was limited to the use of flow coaters, dip coat, brush coat, hand held aerosol cans roller coat or air brush. These coating applications minimizing the overspray from spray coating. 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.3 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. The monitoring method includes the requirement to perform routine inspection of the fans in the finishing-line area. 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. Mutual Materials 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.3 of the permit also provide reasonable assurance of continuous compliance with Puget Sound Clean Air Agency Regulation I, Section 9.20(a).

## **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 finishing line, 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.4 of the permit. Order of Approval No. 8197 requires Mutual Materials to use a differential pressure gauge to determine if

the baghouse is operating within an acceptable range. Mutual Materials 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. In addition, the permit requires the facility to take action if there is a major change in the differential pressure from one day of operation to the next. A major increase or decrease in differential pressure is more likely to indicate a potential problem with the baghouse than the broad acceptable range, and better characterizes when action should be taken. However, evaluating the pressure differential both for major changes and for an acceptable value will provide a good basis for assuring the baghouse is in good working order.

## **VII. MONITORING, MAINTENANCE AND RECORDKEEPING**

### ***A. How monitoring methods in Section II of the AOP were originally determined***

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.

## 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. PROHIBITED ACTIVITIES**

Some of the requirements Mutual Materials 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 Mutual Materials 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.

## **X. ACTIVITIES REQUIRING ADDITIONAL APPROVAL**

Some of the requirements Mutual Materials 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. WAC 173-400-110 does not apply within Puget Sound Clean Air Agency's jurisdiction because the rule exempts areas that have a local program that is incorporated into the state implementation plan.

## **XI. STANDARD TERMS AND CONDITIONS**

This section contains the standard terms and conditions specifically listed in WAC 173-401-620, as well as other conditions that apply to Mutual Materials.

Some of the requirements Mutual Materials 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.2 of the permit requires Mutual Materials to report deviations of the permit to the Puget Sound Clean Air Agency, normally within 30 days after the end of the month. Section V.Q.1 of the permit requires that a responsible official certify all required reports at least once every six months. Mutual Materials may submit the certification with the report or certify all the reports submitted in the previous six months. For example, if Mutual Materials detected a deviation in January, it must report the deviation to the Puget Sound Clean Air Agency 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 Mutual Materials does not detect any deviations to report for a six-month period, then Mutual Materials shall report that there were no deviations during the six-month period.

## **XII. OBSOLETE REQUIREMENTS**

Puget Sound Clean Air Agency Order of Approval No. 6387, Condition No. 1, requires that the approved equipment be established according to plans and specifications on file with the Puget Sound Clean Air Agency. Mutual Materials filed a Notice of Completion with the Puget Sound Clean Air Agency and after an inspection, the Puget Sound Clean Air Agency has determined that Mutual Materials established the equipment according to the plans and specifications as required. Therefore, Order of Approval Condition No. 1 is an obsolete requirement and not listed in the permit.

The Puget Sound Clean Air Agency Order of Approval No. 6387, Condition No. 2, informs the source that all other Puget Sound Clean Air Agency rules still apply, specifically the requirement to development and implement an O&M Plan. Condition No. 3 of the Order also informs the source that it has the responsibility to comply with requirements of other agencies. The Puget Sound Clean Air Agency has determined that these are for information and do not meet the requirements of being an applicable requirement.

Condition 4 of NOC No. 6387 requires Mutual Materials to notify this agency upon finalization of a contract for increase of the stack height by no later than May 31, 1996. Condition 5 of NOC No. 6387 requires Mutual Materials to complete construction of the Keller stack by no later than September 1, 1996. Mutual Materials has complied with both of these requirements. These one-

time requirements have already been complied with, and there is no point in having them in the permit as requirements for which Mutual Materials must demonstrate compliance on an ongoing basis, therefore they are obsolete. These requirements are not in the AOP.

### XIII. BASIS FOR INAPPLICABLE REQUIREMENTS

Mutual Material’s Title V application identified several Puget Sound Clean Air Agency and Washington Department of Ecology Regulations as inapplicable. These requirements were removed from the Inapplicable Requirements table for several reasons:

- Mutual Materials is required to comply with the requirements that are in the air operating permit. Mutual Materials is not required (by the air operating permit) 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 Mutual Materials 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.

Based on this rationale, all of the following requirements listed by Mutual Materials in their original AOP application have been removed from the AOP for this renewal:

Requirement	Adoption or Effective Date	Description and Reason for Inapplicability
WAC 173-400-050(2)	3/22/91	Requirement to limit carbonyls emissions to 100 ppmv from incinerators. Mutual Materials does not have any incinerators and will need a notice of construction to install one.
WAC 173-400-075	10/14/96	Emission standards for sources emitting HAPs. Mutual Materials does not have any of the facilities listed and would have to get approval from the Puget Sound Clean Air Agency to install such equipment.
WAC 173-400-101	3/22/95	Registration requirements. Operating permit sources are exempt from registration.
WAC 173-434	10/18/90	Solid Waste Incinerator Facility rules. Mutual Materials does not have any solid waste incinerators and would need a permit to install one.
WAC 173-490-030	3/22/91	Registration and Reporting for some VOC sources. Operating permit sources are exempt from registration under RCW 70.94.161(17).
40 CFR 58	At the time of permit	EPA ambient AQ surveillance. These do not apply to sources.

Requirement	Adoption or Effective Date	Description and Reason for Inapplicability
40 CFR Part 60: Subpart K Subpart Ka Subpart Kb	issuance  6/11/73 5/18/78 7/23/84	Standards of Performance for VOC Storage Vessels. Mutual Materials does not have any storage tanks with a storage capacity of 40 m <sup>3</sup> (10,570 gal) or greater and would need to get approval from the Puget Sound Clean Air Agency to install such a tank.

#### XIV. EXPLANATION OF CHANGES MADE DURING THE COURSE OF PERMIT RENEWAL

On April 12, 2005 Mutual Materials submitted a Title V renewal application for the New Castle facility. The application consisted of a cover letter and critical items required under WAC 173-401-710, such as a compliance plan and certification by the responsible official. On April 12, 2005 the Puget Sound Clean Air Agency sent a letter to Mutual Materials indicating that the renewal application had been found to be complete. No substantive changes to the permit were requested by Mutual Materials or made by the Puget Sound Clean Air Agency, but numerous small items were changed, and those changes are described in detail below.

The format of the AOP was changed to the latest Agency form, and numerous regulatory references throughout the AOP were updated due to rule changes since the last time the permit was open.

##### ***A. Changes throughout Section I (tables of requirements)***

- The tables in Section I have been changed. Previously, facility-wide requirements and requirements for each emission unit were expressed in two tables each. The first table contained requirements that were in the State Implementation Plan (SIP) and were therefore “federally enforceable,” immediately followed by a second table with the requirements that were “*STATE ONLY*.” Also, there was a rather lengthy notation below each of the old, federally enforceable requirements stating that the requirement would be superseded by the new requirement, once that new requirement was adopted into the SIP. The new table style consolidates the two-table system into a single table for facility wide requirements and for each emission unit requirements. The notations below each of the “dual” requirements have been replaced with a single explanation of the SIP and *STATE ONLY* adoption process and the display conventions used in all the tables. This one-time explanation is contained in the paragraph between the Section I heading and the requirements tables. The *STATE ONLY* requirements are shown with their federally enforceable counterparts, with the dates *italicized*, as shown below:

Reqmt No.	Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring, Maintenance & Recordkeeping Method
<b>Particulate Matter Standards</b>				
I.A.3	Puget Sound Clean Air Agency Reg I: 9.09	<u>4/9/98</u>	Mutual Materials shall not emit particulate matter in excess of 0.05 gr/dscf from equipment used in a manufacturing process.	II.A.1(a) Opacity Monitoring
I.A.4	<u>WAC 173-400-060</u> <u>WAC 173-400-060 (STATE ONLY)</u>	<u>3/22/91</u> <u>2/10/05</u>	Mutual Materials shall not emit particulate matter in excess of 0.1 gr/dscf uncorrected for excess air from general process units	II.A.1(a) Opacity Monitoring
I.A.5	<u>WAC 173-400-050(1)</u> <u>WAC 173-400-050(1) (STATE ONLY)</u>	<u>3/22/91</u> <u>2/10/05</u>	Mutual Materials shall not emit particulate matter in excess of 0.1 gr/dscf corrected to 7% O <sub>2</sub> from combustion and incineration units.	II.A.1(e) Facility-Wide Inspections
<b>SO<sub>2</sub> Standards</b>				
I.A.6	Puget Sound Clean Air Agency Reg I: 9.07 <u>WAC 173-400-040(6) first paragraph only.</u> <u>WAC 173-400-040(6) (STATE ONLY)</u>	<u>4/14/94</u> <u>9/23/93</u> <u>2/10/05</u>	Mutual Materials shall not emit SO <sub>2</sub> in excess of 1,000 ppmv (dry) corrected to 7% O <sub>2</sub> for fuel burning equipment	No monitoring required

## 1. Changes in Facility-wide applicable requirements

The facility-wide applicable requirements have been reorganized and the effective dates have been updated for applicable requirements that have been changed since the issue date of the original AOP. The federally enforceable and non-federally enforceable requirements have been consolidated into a single table, and the requirements have been reorganized by pollutant.

## 2. Changes to Emission Unit Specific Requirements

The two tables (Federally Enforceable and Non-federally Enforceable Requirements) have been merged.

**EU-1.5** Order of Approval No. 6387, Condition 7 requires Mutual Materials to install and properly operate a continuous stack temperature recorder in accordance with Puget Sound Clean Air Agency Regulation I, Sections 12.03 and 12.04(a) through (e) (as per Resolution No. 644, effective 8/10/89). Section 12.03 of Regulation I has been revised, and 12.04 has been deleted. A scanned copy of Resolution No. 644 can be found on the Agency web page. The essence of Sections 12.03 and 12.04 as applies to temperature measurements are that the temperature monitor must be accurate to within  $\pm 5$  °F and monitoring results must be reduced to 15-minute averages.

**EU-1.7 & 8** Mutual Materials is subject to National Emission Standards for Hazardous Air Pollutants 40 CFR 63 Subpart JJJJ because the source has the potential to emit the hazardous air pollutant hydrogen fluoride in excess of 10 tons per year. No emission limits or operating requirements apply because the only applicable emission unit is an existing tunnel kiln with less than 10 ton per hour design capacity. These requirements were inserted, along with a monitoring requirement in Section II.

### ***B. Changes to Section II***

An effort was made to insert the appropriate rule reference at the end of each paragraph of Section II (see example at the end of this paragraph). The example shown here refers to the operating permit rule that requires the permitting authority to impose a “gap-filling requirement” when the underlying requirement does not contain a monitoring method.

[WAC 173-401-615(1)(b), 10/17/02]

### ***C. Changes to Section III***

No changes to this section.

### ***D. Changes to Section IV***

**Section IV.D** This section, which describes Puget Sound Clean Air Agency Regulation I, was reworded and renumbered to exactly match Section 9.16, Regulation I, as of 7/1/02.

### ***E. Changes to Section V***

**Section V.M.5** A sentence requiring compliance certification by the responsible official was added. The following sentence was also added, “Submittal of a Puget Sound Clean Air Agency “OPERATING PERMIT – ANNUAL CERTIFICATION FORM,” completed in accordance with the instructions on the form, fulfills the requirements of this subsection.” This paragraph was inserted because no environmental benefit is gained by making the source submit annual compliance certifications in “long form,” in addition to the annual form provided by the Puget Sound Clean Air Agency.

**Section V.P:** The data recovery requirement is now much shorter, but we now expect data recovery to be 100%.

**Section V.Q:** This section has been overhauled. An effort has been made to make the reporting subsection more understandable without losing the legal requirements. Reporting requirements are not changed from those in the original AOP; it’s just that those requirements are spelled out more clearly now.

**Section V.Z:** This section has been revised to include new wording to accommodate the changes in WAC 173-401-530(2) with regard to monitoring of insignificant emissions units. Inclusion of this new wording, which was developed after several meetings with EPA Region X, is mandatory.

***F. No Changes to Section VI***

***G. No Changes to Section VII***

***H. No Changes to Section VIII***

***I. No Changes to Section IX***

***J. No Changes to Section X***

**XV. PUBLIC COMMENTS AND RESPONSES**

***A. Original AOP***

A 30-day public comment period expired on January 30, 1999.

No responses were received.

***B. First Renewal***

The only comment received was from Mutual Materials. That comment was a request to change contact person information on the front page of the AOP, as follows:

Comments

- 1) Title page, change spelling of name for responsible official, to Joseph W. Bowen.
- 2) Title page, change site contact to: Neal Bachelder
- 3) Title page, change site contact phone number to: (425) 255-1101
- 4) Title page, change site contact fax number to: (425) 235-4827

***Puget Sound Clean Air Agency Response:***

Changes made as requested