



AIR OPERATING PERMIT

Puget Sound Clean Air Agency
110 Union Street, Suite 500
Seattle, Washington 98101

Issued in accordance with the provisions of Puget Sound Clean Air Agency (previously known as Puget Sound Air Pollution Control Agency) Regulation I, Article 7 and Chapter 173-401 WAC.

Pursuant to Puget Sound Clean Air Agency (PSCAA) Regulation I, Article 7 and Chapter 173-401 WAC, Dynea Overlays, Inc is authorized to operate subject to the terms and conditions in this permit.

PERMIT NO. 12048

DATE OF ISSUANCE: May 1, 2002

ISSUED TO: Dynea Overlays, Inc.

PERMIT EXPIRATION DATE: May 1, 2007


SIC Code, Primary: 2672
Nature of Business: Industrial and Decorative Paper Impregnation

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Gerald S. Pade
Permit Engineer

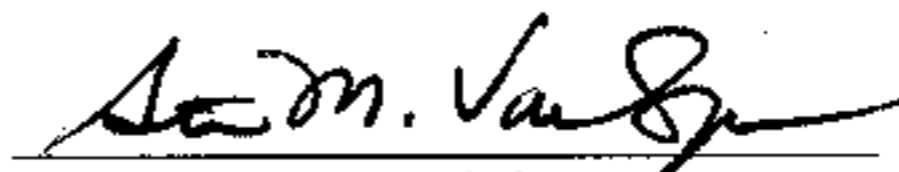

Steve M. Van Slyke, PE
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I. EMISSION LIMITS AND PERFORMANCE STANDARDS

The following tables list the citation for the “applicable requirement” in the second column. The third column (Date) contains the adoption or effective date of the requirement. In some cases, the effective dates of the Federally Enforceable Requirement and the State Only Requirement are different because only rules approved by EPA through Sections 110, 111, and 112 of the federal Clean Air Act are federally enforceable and either the state has not submitted the regulation to the EPA or the EPA has not approved it.

The first column is used as an identifier for the requirement, and 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 & Recordkeeping Method) identifies methods described in Section II of the permit. Following these methods is an enforceable requirement of this permit. 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.

A. FACILITY-WIDE APPLICABLE REQUIREMENTS

The requirements in this section apply facility-wide to all the emission units regulated by this permit.

Reqmt. No.	Federally Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring, Maintenance & Recordkeeping Method (See Section II)	Emission Standard Period	Reference Test Method
I.A.1	PSCAA Reg. I: 9.03 WAC 173-400-040(1)	9/08/94 9/20/93	Shall not emit air contaminants in excess of 20% opacity for more than 3 minutes per hour	Opacity Monitoring (See II.A.1(a))	More than 3 min. in any 1 hr	Ecology Method 9A (See Section IX)
I.A.2	PSCAA Reg. I: 9.07 WAC 173-400-040(6) (first paragraph only)	4/14/94 9/20/93	Shall not emit SO ₂ in excess of 1,000 ppmv (dry) corrected to 7% O ₂ for fuel burning equipment	No monitoring required	Average of three 1-hr tests	EPA Method 6C (See 40 CFR Part 60, Appendix A, July 1, 2001)
I.A.3	PSCAA Reg. I: 9.09 WAC 173-400-060	2/10/94 3/22/91	Shall not emit particulate matter in excess of 0.05 gr/dscf from equipment used in a manufacturing process and general process units, uncorrected for excess air	Opacity Monitoring (See II.A.1(a))	Average of three 1-hr tests	PSCAA Method 5 (See Section IX)
I.A.4	PSCAA Reg. I: 9.09 WAC 173-400-050(1)	2/10/94 3/22/91	Shall not emit particulate matter in excess of 0.05 gr/dscf corrected to 7% O ₂ from fuel burning equipment and combustion sources (applies only to boilers, space heaters and water heaters)	No monitoring required	Average of three 1-hr tests	PSCAA Method 5 (See Section IX)

Reqmt. No.	Federally Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring, Maintenance & Recordkeeping Method (See Section II)	Emission Standard Period	Reference Test Method
I.A.5	PSCAA Reg. I: 9.11(a) PSCAA Reg. I: 9.15(d) WAC 173-400-040(5)	6/09/83 8/10/89 9/20/93	Shall not emit air contaminants in sufficient quantities and of such characteristics and duration as is, or is likely to be, injurious to human health, plant or animal life, or property, or which unreasonably interferes with enjoyment of life and property	Facility-Wide Inspections (See II.A.1(c)) Complaint Response (See II.A.1(b))	N/A	N/A
I.A.6	PSCAA Reg. I: 9.15(a) WAC 173-400-040(3) WAC 173-400-040(8)	8/10/89 9/20/93 9/20/93	Must employ BACT for fugitive dust	Facility-Wide Inspections (See II.A.1(c)) Complaint Response (See II.A.1(b))	N/A	N/A
I.A.7	PSCAA Reg. I: 9.15(b)	8/10/89	Must employ measures to prevent track-out and spillage of particulate matter on paved public roadways	Facility-Wide Inspections (See II.A.1(c)) Complaint Response (See II.A.1(b))	N/A	N/A
I.A.8	PSCAA Reg. I: 9.15(c)	8/10/89	Shall not emit fugitive dust from any fuel burning equipment, equipment used in a manufacturing process, or control equipment	Facility-Wide Inspections (See II.A.1(c)) Complaint Response (See II.A.1(b))	N/A	N/A
I.A.9	PSCAA Reg. I: 9:20(b)	6/09/88	Must maintain equipment not subject to PSCAA Reg. I, Section 9.20(a) in good working order	Minimum Monitoring and Maintenance Requirements (See II.A)	N/A	N/A

Reqmt. No.	Federally Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring, Maintenance & Recordkeeping Method (See Section II)	Emission Standard Period	Reference Test Method
I.A.10	PSCAA Reg. I: 7.09(b)	9/12/96	Must develop and implement an O&M Plan to assure continuous compliance with PSCAA Regulation I, II, III	Operation and Maintenance (O&M) Plan Requirements (See II.A.2(d))	N/A	N/A

N/A = Not applicable

The following facility-wide requirements are **not** federally enforceable. They are enforceable only by the Puget Sound Clean Air Agency and/or the Washington State Department of Ecology.

Reqmt. No.	State/PSCAA Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring, Maintenance & Recordkeeping Method (See Section II)	Emission Standard Period	Reference Test Method
I.A.11	PSCAA Reg. I: 7.09(b)	9/10/98	Must develop and implement an O&M Plan to assure continuous compliance with PSCAA Regulation I, II, III	Operation and Maintenance (O&M) Plan Requirements (See II.A.2(d))	N/A	N/A
I.A.12	PSCAA Reg. I: 9.03 WAC 173-400-040(1)	3/11/99 9/15/01	Shall not emit air contaminants in excess of 20% opacity for more than 3 minutes per hour	Opacity Monitoring (See II.A.1(a))	More than 3 min. in any 1 hr	Ecology Method 9A (See Section IX)
I.A.13	WAC 173-400-040(6) (first paragraph only)	9/15/01	Shall not emit SO ₂ in excess of 1,000 ppmv (dry) corrected to 7% O ₂ for fuel burning equipment	No monitoring required	Average of three 1-hr tests	EPA Method 6C (See 40 CFR Part 60, Appendix A, July 1, 2001)
I.A.14	PSCAA Reg. I: 9.09 WAC 173-400-060	4/9/98 9/15/01	Shall not emit particulate matter in excess of 0.05 gr/dscf from equipment used in a manufacturing process and general process units, uncorrected for excess air	Opacity Monitoring (See II.A.1(a))	Average of three 1-hr tests	PSCAA Method 5 (See Section IX)
I.A.15	PSCAA Reg. I: 9.09 WAC 173-400-060	4/9/98 9/15/01	Shall not emit particulate matter in excess of 0.05 gr/dscf corrected to 7% O ₂ from fuel burning equipment and combustion sources (applies only to boilers, space heaters and water heaters)	No monitoring required	Average of three 1-hr tests	PSCAA Method 5 (See Section IX)

Reqmt. No.	State/PSCAA Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring, Maintenance & Recordkeeping Method (See Section II)	Emission Standard Period	Reference Test Method
I.A.15	PSCAA Reg. I: 9.10(a)	6/09/88	Shall not emit HCl in excess of 100 ppm (dry) corrected to 7% O ₂ for combustion sources	No monitoring required	Average of three 1-hr tests	EPA Method 26A (See 40 CFR Part 60, Appendix A, July 1, 2001)
I.A.16	PSCAA Reg. I: 9.11(a) WAC 173-400-040(5)	3/11/99 9/15/01	Shall not emit air contaminants in sufficient quantities and of such characteristics and duration as is, or is likely to be, injurious to human health, plant or animal life, or property, or which unreasonably interferes with enjoyment of life and property	Facility-Wide Inspections (See II.A.1(c)) Complaint Response (See II.A.1(b))	N/A	N/A
I.A.17	PSCAA Reg. I: 9.15(a) WAC 173-400-040(3) WAC 173-400-040(8)	3/11/99 9/15/01 9/15/01	Must employ reasonable precautions for fugitive dust	Facility-Wide Inspections (See II.A.1(c)) Complaint Response (See II.A.1(b))	N/A	N/A
I.A.18	WAC 173-400-040(4)	9/15/01	Must use recognized good practice and procedures to reduce odors which may unreasonably interfere with any other property owners' use and enjoyment of their property	Facility-Wide Inspections (See II.A.1(c)) Complaint Response (See II.A.1(b))	N/A	N/A
I.A.19	WAC 173-400-040(2)	9/15/01	Shall not deposit particulate matter beyond property boundary in sufficient quantity to interfere unreasonably with the use and enjoyment of the property	Facility-Wide Inspections (See II.A.1(c)) Complaint Response (See II.A.1(b))	N/A	N/A

Reqmt. No.	State/PSCAA Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring, Maintenance & Recordkeeping Method (See Section II)	Emission Standard Period	Reference Test Method
I.A.20	RCW 70.94.040	1996	Shall not emit air contaminants in sufficient quantities and of such characteristics and duration as is, or is likely to be, injurious to human health, plant or animal life, or property, or which unreasonably interferes with enjoyment of life and property or cause a violation of RCW 70.94 or any regulation adopted hereunder	Facility-Wide Inspections (See II.A.1(c)) Complaint Response (See II.A.1(b))	N/A	N/A

N/A = Not applicable

B. EMISSION UNIT SPECIFIC APPLICABLE REQUIREMENTS

The requirements in Section I.B only apply to the specific emission units cited. However, the facility-wide requirements in Section I.A. also apply to these units.

1. Industrial Paper Coating Line 1 (includes Dryers and Thermal Oxidizer)

Reqmt. No.	Federally Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring, Maintenance & Recordkeeping Method (See Section II)	Emission Standard Period	Reference Test Method
EU 1.1.	PSCAA Reg. I: 9:20(a)	6/09/88	Must maintain sources approved under PSCAA Reg. I, Article 6, in good working order	Minimum Monitoring and Maintenance Requirements (See II.A)	N/A	N/A
EU 1.2.	PSCAA Reg. II: 3.03 PSCAA Reg. I: 3.23	2/10/94 9/12/96	Shall not apply any coating with a VOC content in excess of 2.9 lb/gal, excluding water Other emission reduction methods may be employed to achieve compliance if they are at least as effective and they are included in an Order of Approval (See Order of Approval No. 5089)	Temperature Monitoring (See II.A.2(b))	N/A	N/A

Reqmt. No.	Federally Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring, Maintenance & Recordkeeping Method (See Section II)	Emission Standard Period	Reference Test Method
EU 1.3.	PSCAA Order of Approval No. 5089: Condition 6	10/4/93	Must install and maintain a continuous temperature monitor for the thermal oxidizer	Temperature Monitoring (See II.A.2(b))	N/A	N/A
EU 1.4.	PSCAA Order of Approval No. 5089: Condition 7	10/4/93	Must send written report to PSCAA within 30 days of any time line 1 is operated when the thermal oxidizer operating temperature is below 1400 degrees F	N/A	N/A	N/A
EU 1.5.	PSCAA Order of Approval No. 5089: Condition 5	10/4/93	Must have stack height of 50 feet and exit diameter of 32 inches	No monitoring required	N/A	N/A

N/A = Not applicable

The following emission unit specific requirements are **not** federally enforceable. They are enforceable only by the Puget Sound Clean Air Agency and the Washington State Department of Ecology.

Reqmt. No.	State/PSCAA Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring, Maintenance & Recordkeeping Method (See Section II)	Emission Standard Period	Reference Test Method
EU 1.6.	RCW 70.94.152(7)	1996	Must maintain equipment in good working order	Minimum Monitoring and Maintenance Requirements (See II.A)	N/A	N/A

N/A = Not applicable

2. Decorative Paper Coating Line 2 (includes Dryers and Thermal Oxidizer)

Reqmt. No.	Federally Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring, Maintenance & Recordkeeping Method (See Section II)	Emission Standard Period	Reference Test Method
EU 2.1.	PSCAA Reg. I: 9:20(a)	6/09/88	Must maintain sources approved under PSCAA Reg. I, Article 6, in good working order	Minimum Monitoring and Maintenance Requirements (See II.A)	N/A	N/A
EU 2.2.	PSCAA Reg. II: 3.03	2/10/94	Shall not apply any coating with a VOC content in excess of 2.9 lb/gal, excluding water	No monitoring required	N/A	EPA Method 24 (See 40 CFR Part 60, Appendix A, July 1, 2001)
EU 2.3.	PSCAA Order of Approval No. 5089: Condition 4	10/4/93	Must have stack height of 45 feet and exit diameter of 32 inches	No monitoring required	N/A	N/A
EU 2.4.	PSCAA Order of Approval No. 5089: Condition 6	10/4/93	Must install and maintain a continuous temperature monitor for the thermal oxidizer	Temperature Monitoring (See II.A.2(b))	N/A	N/A
EU 2.5.	PSCAA Order of Approval No. 5089: Condition 7	10/4/93	Must send written report to the PSCAA within 30 days of any time line 2 is operated when the thermal oxidizer operating temperature is below 1500 degrees F	N/A	N/A	N/A

N/A = Not applicable

The following emission unit specific requirements are **not** federally enforceable. They are enforceable only by the Puget Sound Clean Air Agency and the Washington State Department of Ecology.

Reqmt. No.	State/PSCAA Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring, Maintenance & Recordkeeping Method (See Section II)	Emission Standard Period	Reference Test Method
EU 2.6.	RCW 70.94.152(7)	1996	Must maintain equipment in good working order	Minimum Monitoring and Maintenance Requirements (See II.A)	N/A	N/A

N/A = Not applicable

3. Decorative Paper Coating Line 3 (includes Dryers and Catalytic Oxidizer)

Reqmt. No.	Federally Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring, Maintenance & Recordkeeping Method (See Section II)	Emission Standard Period	Reference Test Method
EU 3.1.	PSCAA Reg. I: 9:20(a)	6/09/88	Must maintain sources approved under PSCAA Reg. I, Article 6, in good working order	Minimum Monitoring and Maintenance Requirements (See II.A)	N/A	N/A
EU 3.2.	PSCAA Reg. II: 3.03	2/10/94	Shall not apply any coating with a VOC content in excess of 2.9 lb/gal, excluding water	No monitoring required	N/A	EPA Method 24 (See 40 CFR Part 60, Appendix A, July 1, 2001)
EU 3.3.	PSCAA Order of Approval No. 7208: Condition 3	2/06/98	Catalytic oxidizer must have a destruction efficiency of at least 95%	Source Testing (See II.A.2(a)) Temperature Monitoring (See II.A.2(b)) Catalyst Testing (See II.A.2(c))	Avg. of three 1-hr tests	EPA Method 308 (see 40 CFR Part 63, Appendix A, 7/1/01)
EU 3.4.	PSCAA Order of Approval No. 7208: Condition 4	2/06/98	Coating line (incl. dip tank area) must be maintained under negative pressure when in operation	Source Testing (See II.A.2(a))	N/A	N/A
EU 3.5.	PSCAA Order of Approval No. 7208: Condition 5	2/06/98	Opacity of emissions from catalytic oxidizer must not exceed 5% for more than 3 minutes during any hour	Opacity Monitoring (See II.A.1(a))	N/A	WDOE Method 9A (See Section IX)
EU 3.6.	PSCAA Order of Approval No. 7208: Condition 6	2/06/98	Compliance with the destruction efficiency requirement must be demonstrated every 5 years	Source Testing (See II.A.2(a))	N/A	N/A

Reqmt. No.	Federally Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring, Maintenance & Recordkeeping Method (See Section II)	Emission Standard Period	Reference Test Method
EU 3.7.	PSCAA Order of Approval No. 7208: Condition 7	2/06/98	Compliance with negative pressure requirement must be demonstrated annually	Source Testing (See II.A.2(a))	N/A	N/A
EU 3.8.	PSCAA Order of Approval No. 7208: Condition 8	2/06/98	Temperature of the catalyst must be at least 550 degrees F before operating coating line	Temperature Monitoring (See II.A.2(b))	N/A	N/A
EU 3.9.	PSCAA Order of Approval No. 7208: Condition 9	2/06/98	Temperature at the inlet and outlet of the catalyst must be continuously monitored and recorded whenever it is in operation	Temperature Monitoring (See II.A.2(b))	N/A	N/A
EU 3.10.	PSCAA Order of Approval No. 7208: Condition 10	2/06/98	Thermocouples on the catalytic oxidizer must be audited annually	Temperature Monitoring (See II.A.2(b))	N/A	N/A
EU 3.11.	PSCAA Order of Approval No. 7208: Condition 11	2/06/98	Samples of catalyst must be analyzed for activity annually and the catalyst reactivated or replaced (or the operating temp. increased) as necessary to maintain required efficiency	Catalyst Testing (See II.A.2(c))	N/A	N/A

N/A = Not applicable

The following emission unit specific requirements are **not** federally enforceable. They are enforceable only by the Puget Sound Clean Air Agency and the Washington State Department of Ecology.

Reqmt. No.	State/PSCAA Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring, Maintenance & Recordkeeping Method (See Section II)	Emission Standard Period	Reference Test Method
EU 3.12	RCW 70.94.152(7)	1996	Must maintain equipment in good working order	Minimum Monitoring and Maintenance Requirements (See II.A)	N/A	N/A

N/A = Not applicable

4. Decorative Paper Coating Line 4 (includes Dryers and Catalytic Oxidizer)

Reqmt. No.	Federally Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring, Maintenance & Recordkeeping Method (See Section II)	Emission Standard Period	Reference Test Method
EU 4.1.	PSCAA Reg. I: 9:20(a)	6/09/88	Must maintain sources approved under PSCAA Reg. I, Article 6, in good working order	Minimum Monitoring and Maintenance Requirements (See II.A)	N/A	N/A
EU 4.2.	PSCAA Reg. II: 3.03	2/10/94	Shall not apply any coating with a VOC content in excess of 2.9 lb/gal, excluding water	No monitoring required	N/A	EPA Method 24 (See 40 CFR Part 60, Appendix A, July 1, 2001)
EU 4.3.	PSCAA Order of Approval No. 7784: Condition 3	5/10/99	Catalytic oxidizer must have a destruction efficiency of at least 95%	Source Testing (See II.A.2(a)) Temperature Monitoring (See II.A.2(b)) Catalyst Testing (See II.A.2(c))	Avg. of three 1-hr tests	EPA Method 308 (see 40 CFR Part 63, Appendix A, 7/1/01)
EU 4.4.	PSCAA Order of Approval No. 7784: Condition 4	5/10/99	Coating line (incl. dip tank area) must be maintained under negative pressure when in operation	Source Testing (See II.A.2(a))	N/A	N/A
EU 4.5.	PSCAA Order of Approval No. 7784: Condition 5	5/10/99	Opacity of emissions from catalytic oxidizer must not exceed 5% for more than 3 minutes during any consecutive 60 minute period	Opacity Monitoring (See II.A.1(a))	N/A	WDOE Method 9A (See Section IX)
EU 4.6.	PSCAA Order of Approval No. 7784:	5/10/99	Compliance with the destruction efficiency requirement must be demonstrated within	Source Testing	N/A	N/A

Reqmt. No.	Federally Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring, Maintenance & Recordkeeping Method (See Section II)	Emission Standard Period	Reference Test Method
	Condition 6		90 days of startup and every 5 years thereafter	(See II.A.2(a))		
EU 4.7.	PSCAA Order of Approval No. 7784: Condition 7	5/10/99	Compliance with negative pressure requirement must be demonstrated annually	Source Testing (See II.A.2(a))	N/A	N/A
EU 4.8.	PSCAA Order of Approval No. 7784: Condition 8	5/10/99	Temperature of the catalyst must be at least 500 degrees F before operating coating line	Temperature Monitoring (See II.A.2(b))	N/A	N/A
EU 4.9.	PSCAA Order of Approval No. 7784: Condition 9	5/10/99	Temperature at the inlet and outlet of the catalyst must be continuously monitored and recorded whenever it is in operation	Temperature Monitoring (See II.A.2(b))	N/A	N/A
EU 4.10.	PSCAA Order of Approval No. 7784: Condition 10	5/10/99	Thermocouples on the catalytic oxidizer must be audited annually	Temperature Monitoring (See II.A.2(b))	N/A	N/A
EU 4.11.	PSCAA Order of Approval No. 7784: Condition 11	5/10/99	Samples of catalyst must be analyzed for activity annually and the catalyst reactivated or replaced (or the operating temp. increased) as necessary to maintain required efficiency	Catalyst Testing (See II.A.2(c))	N/A	N/A

N/A = Not applicable

The following emission unit specific requirements are **not** federally enforceable. They are enforceable only by the Puget Sound Clean Air Agency and the Washington State Department of Ecology.

Reqmt. No.	State/PSCAA Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring, Maintenance & Recordkeeping Method (See Section II)	Emission Standard Period	Reference Test Method
EU 4.12	RCW 70.94.152(7)	1996	Must maintain equipment in good working order	Minimum Monitoring and Maintenance Requirements (See II.A)	N/A	N/A

N/A = Not applicable

5. Pilot Treater (includes Dryers)

Reqmt. No.	Federally Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring, Maintenance & Recordkeeping Method (See Section II)	Emission Standard Period	Reference Test Method
EU 5.1.	PSCAA Reg. I: 9:20(a)	6/09/88	Must maintain sources approved under PSCAA Reg. I, Article 6, in good working order	Minimum Monitoring and Maintenance Requirements (See II.A)	N/A	N/A
EU 5.2.	PSCAA Order of Approval No. 5181: Condition 4	10/6/94	Operations shall be limited to 10 hr/day at 2 m/min for a maximum of 750 hr/yr	Pilot Treater (See II.A.2(d))	N/A	N/A

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Reqmt. No.	State/PSCAA Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)	Monitoring, Maintenance & Recordkeeping Method (See Section II)	Emission Standard Period	Reference Test Method
EU 5.3	RCW 70.94.152(7)	1996	Must maintain equipment in good working order	Minimum Monitoring and Maintenance Requirements (See II.A)	N/A	N/A

N/A = Not applicable

II. MONITORING, MAINTENANCE AND RECORDKEEPING PROCEDURES

A. Minimum Monitoring and Maintenance Requirements

1. Facility-Wide Monitoring

(a) Opacity Monitoring

Dynea Overlays shall conduct weekly inspections of the coating lines and annual inspections of the boilers, space heaters and water heaters for exhaust opacity. Inspections are to be performed while the equipment is in operation during daylight hours. If visible emissions other than uncombined water are observed, Dynea Overlays shall, within 24 hours of the initial observation, take corrective action until there are no visible emissions or, alternatively, record the opacity using the reference test method or shut down the unit or activity until it can be repaired.

(b) Complaint Response

Dynea Overlays shall record and investigate complaints received regarding fugitive dust, track-out, odor bearing contaminants and other emissions as soon as possible, but no later than one day after receipt. Complaints regarding fugitive emissions shall be identified as follows:

- i. Any emissions that are, or likely to be, injurious to human health, plant or animal life, or property, or which unreasonably interfere with enjoyment of life and property; or
- ii. Any emissions from fallout; or
- iii. Any track-out onto paved roads open to the public; or
- iv. Any emissions of odor-bearing air contaminants; or
- v. Complaints regarding other applicable requirements.

Dynea Overlays shall investigate the complaint and determine if there was noncompliance with an applicable requirement of this permit. If it is determined to be noncompliance, Dynea Overlays shall correct the problem, as soon as possible but, within 24 hours of determination or shut down the noncompliant operation until it is repaired or corrected.

(c) Facility-Wide Inspections

Dynea Overlays shall conduct a facility-wide inspection at least once per calendar quarter. These inspections shall include checking for prohibited activities under Section III of the permit and activities that require additional approval under Section IV of the permit. The inspections shall also examine the general state of compliance with the general applicable requirements and the general effectiveness of the Operation & Maintenance (O&M) Plan.

The facility-wide inspection shall include an inspection of the facility for odor-bearing contaminants and emissions of any air contaminant in sufficient quantities and of such characteristics and duration as is, or is likely to be, injurious to human health, plant or animal life, or property, or which unreasonably interfere with enjoyment of life and property. Dynea Overlays shall also conduct inspections for fugitive dust and track-out while conducting activities, such as construction, that are likely to generate fugitive dust or track-out.

Dynea Overlays shall correct any problems identified by these inspections, as soon as possible, but within 24 hours of identification or shut down the unit or activity until the problem can be corrected.

(d) Maintenance and Repair of Insignificant Emission Units

Dynea Overlays shall use good industrial practices to maintain insignificant emission units and equipment¹ not listed in this permit. For such equipment, Dynea Overlays shall also promptly repair defective equipment.

2. Specific Monitoring Methods

(a) Source Testing

Dynea Overlays shall source test the destruction efficiency of the catalytic oxidizers at least once every 5 years in accordance with the compliance testing requirements in Section V.N of this permit. Dynea Overlays shall also annually verify that the dip tank enclosures are maintained under negative pressure using smoke or dry ice tubes.

¹ PSAPCA Regulation I, Section 1.07(s) says, *EQUIPMENT means any stationary or portable device or any part thereof that emits or may emit any air contaminant into the atmosphere.*

(b) Temperature Monitoring

Dynea Overlays shall continuously monitor the combustion chamber temperature of the thermal oxidizers and the catalyst inlet and outlet temperatures at all times that its respective coating lines are in operation. Dynea Overlays shall audit these thermocouples annually and repair or replace any defective temperature monitoring equipment.

(c) Catalyst Testing

Dynea Overlays shall have samples of the catalyst tested for activity annually. If the catalyst is found to be inactive, Dynea Overlays shall take corrective action, as soon as possible, but within 24 hours of receipt of the test results (i.e., replace or reactivate the catalyst, increase oxidizer operating temperature).

(d) Pilot Treater

Dynea Overlays shall track the daily and annual hours of operation of the pilot treater and the speed at which it was operated.

[WAC 173-401-605(1), 11/4/93; WAC 173-401-615(1), 11/4/93]

B. Operation and Maintenance (O&M) Plan Requirements

Dynea Overlays' O&M Plan shall include procedures specifying how Dynea Overlays will assure continuous compliance with Puget Sound Clean Air Agency Regulations I, II and III. For insignificant emission units, refer to Section II.A.1(d), Maintenance and Repair of Insignificant Emission Units. The plan shall reflect good industrial practice. In most instances, following the manufacturer's operations manual or equipment operational schedule, minimizing emissions until repairs can be completed and taking measures to prevent a recurrence of the problem may be considered good industrial practice. A determination of whether good industrial practice is being used will be based on available information which may include, but is not limited to, monitoring results, opacity observations, review of operations and maintenance procedures, and inspections of the emission unit or equipment. Dynea Overlays shall use the results of the inspections required by this permit in its annual review of the O&M Plan. The specific provisions of the O&M Plan, other than those required by Section II.A, shall not be deemed part of this permit.

III. PROHIBITED ACTIVITIES

Dynea Overlays is prohibited from conducting, causing, or allowing the following activities:

A. Adjustment for Atmospheric Conditions

Varying the rate of emissions of a pollutant according to atmospheric conditions or ambient concentrations of that pollutant is prohibited, except as directed according to air pollution episode regulations. [WAC 173-400-205, 9/20/93]

B. Open Burning

Dynea Overlays shall not conduct open burning during any stage of an air pollution episode or period of impaired air quality and shall not conduct any open burning other than the following types:

1. Fires consisting solely of charcoal, propane, natural gas, or wood used solely for the preparation of food that comply with WAC 173-425-020(1) and WAC 173-425-030(21), and
2. Fires for instruction in the methods of fighting fires, provided that the person conducting the training fire complies with Puget Sound Clean Air Agency Regulation I, Section 8.07.

[PSCAA Reg. I, Section 8.04(a), 11/9/00; PSCAA Reg. I, Section 8.07, 9/9/99] [WAC 173-425-020(1), 3/13/00; WAC 173-425-030(21), 3/13/00; RCW 70.94.743, 1998; RCW 70.94.775(2), 1995, state/local only]

C. Refuse Burning

Dynea Overlays shall not cause or allow the burning of combustible refuse except in a multiple chamber incinerator provided with control equipment. Dynea Overlays shall not operate refuse burning equipment any time other than daylight hours. [PSCAA Reg. I, Section 9.05, 12/9/93]

D. Concealment

Dynea Overlays shall not cause or allow the installation or use of any device or use of any means which, without resulting in a reduction in the total amount of air contaminant emitted, conceals an emission of an air contaminant which would otherwise violate Puget Sound Clean Air Agency Regulation I, Article 9 or Chapter 173-400 WAC. [PSCAA Reg. I, Section 9.13(a), 6/9/88; and WAC 173-400-040(7), 9/20/93; WAC 173-400-040(7), 9/15/01 version state/local only]

E. Masking

Dynea Overlays shall not cause or allow the installation or use of any device or use of any means designed to mask the emission of an air contaminant that causes detriment to health, safety or welfare of any person or conceals or masks an emission of an air contaminant that would otherwise violate Regulation I, Article 9 or Chapter 173-400 WAC. [PSCAA Reg. I, Section 9.13(b), 6/9/88; and WAC 173-400-040(7), 9/20/93, 9/15/01 version state/local only]

F. Ambient Standards

Dynea Overlays shall not cause or allow the emission of air contaminants in sufficient quantity as to exceed any ambient air quality standard in Puget Sound Clean Air Agency Regulation I Section 11.01. [PSCAA Reg. I, Section 11.01(b), 4/14/94]

IV. ACTIVITIES REQUIRING ADDITIONAL APPROVAL

Dynea Overlays shall file notification and obtain the necessary approval from the Puget Sound Clean Air Agency before conducting any of the following:

A. New Source Review

Dynea Overlays shall not establish a new (or modified) source, or replace (or substantially alter) control equipment unless a "Notice of Construction and Application for Approval" has been filed with and approved by PSCAA, except as provided under Section 6.03(b) and (c). [PSCAA Reg. I, Section 6.03, 9/12/96, 7/12/01 version local only] [WAC 173-460-040, 2/14/94 state/local only]

B. Replacement or Substantial Alteration of Emission Control Technology

Dynea Overlays shall file a Notice of Construction and Application for Approval according to WAC 173-400-114 with the Puget Sound Clean Air Agency before replacing or substantially altering any emission control technology installed at the facility. [PSCAA Reg. I, Section 6.03, 9/12/96; 7/12/01 version local only] [WAC 173-400-114, 9/20/93; WAC 173-400-114, 9/15/01 version state/local only, RCW 70.94.153, 1991, state/local only]

C. Asbestos

1. Dynea Overlays shall comply with 40 CFR 61.145 and 61.150 when conducting renovation or demolition activities at the facility. [40 CFR 61.145 and 61.150, 7/1/01]
2. Dynea Overlays shall comply with Puget Sound Clean Air Agency Regulation III, Article 4 when conducting any asbestos project, renovation or demolition activities at the facility. [PSCAA Reg. III, Article 4, 6/8/96, 7/13/00 version local only]

D. Spray Coating

Dynea Overlays shall get prior approval under Puget Sound Clean Air Agency Regulation I, Section 9.16(a) for causing or allowing the use of spray equipment to apply any VOC-containing material except for:

1. The use of hand-held aerosol cans,
2. Touch-up operations,
3. The coating of marine vessels in dry docks,
4. The coating of bridges, water towers, buildings or similar structures,
5. Insecticide, pesticide, or fertilizer spray equipment, and
6. The coating of items that cannot be reasonably handled in an enclosed spray area, provided that the operation has received the prior written approval of the Control Officer. [PSCAA Reg. I, Section 9.16, 6/13/91]

Dynea Overlays shall not spray-coat outside of an enclosed spray area equipped with properly seated paint arresters or water wash curtains and a vertical stack unless a reasonable precautions are used to minimize the overspray. Reasonable precautions include the use of: enclosures and curtailment during high winds; and HVLP, LVLP, electrostatic or air-assisted airless spray equipment. This section does not apply to:

1. Application of architectural or maintenance coatings to stationary structures;
2. Use of HVLP spray guns with a cup capacity ≤ 8 fl oz for coating < 9 ft² per day if allowed by the fire department;
3. Use of air brushes with an airflow of 0.5-2.0 cfm and cup capacity of ≤ 2 fl oz; and
4. Use of hand-held aerosol cans with a capacity of ≤ 1 qt.

[PSCAA Reg. I, Section 9.16, 9/15/01 local only]

V. STANDARD TERMS AND CONDITIONS

[Chapter 173-401 WAC, 11/4/93 version unless otherwise noted]

A. Duty to comply

Dynea Overlays shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation of Chapter 70.94 RCW and, for federally enforceable provisions, a violation of the Federal Clean Air Act (FCAA). Such violations are grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [PSCAA Reg. I, Section 7.05, 10/28/93, WAC 173-401-620(2)(a)]

B. Permit actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by Dynea Overlays for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [WAC 173-401-620(2)(c)]

C. Property rights

This permit does not convey any property rights of any sort, or any exclusive privilege. [WAC 173-401-620(2)(d)]

D. Duty to provide information

Dynea Overlays shall furnish to the Puget Sound Clean Air Agency, within a reasonable time, any information that the Puget Sound Clean Air Agency may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, Dynea Overlays shall also furnish to the Puget Sound Clean Air Agency copies of records required to be kept by the permit or, for information claimed to be confidential, Dynea Overlays may furnish such records directly to EPA Region 10 along with a claim of confidentiality. The Puget Sound Clean Air Agency shall maintain the confidentiality of such information in accordance with RCW 70.94.205. [WAC 173-401-620(2)(e)]

E. Permit fees

Dynea Overlays shall pay fees as a condition of this permit in accordance with Puget Sound Clean Air Agency Regulation I, Article 7. Failure to pay fees in a timely fashion shall subject Dynea Overlays to civil and criminal penalties as prescribed in Chapter 70.94 RCW. [WAC 173-401-620(2)(f)]

F. Emissions trading

No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit. [WAC 173-401-620(2)(g)]

G. Severability

If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable. [WAC 173-401-620(2)(h)]

H. Permit appeals

This permit or any condition in it may be appealed only by filing an appeal with the Pollution Control Hearings Board and serving it on the Puget Sound Clean Air Agency within thirty days of receipt, pursuant to RCW 43.21B.310 and WAC 173-401-735. The provision for appeal in this section is separate from and additional to any federal rights to petition and review found under §505(b) of the FCAA. [WAC 173-401-620(2)(i) and WAC 173-401-735]

I. Permit continuation

This permit and all terms and conditions contained therein, including any permit shield provided under WAC 173-401-640, shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted under WAC 173-401-705(2) shall remain in effect until the renewal permit has been issued or denied if a timely and complete permit application has been submitted. [WAC 173-401-620(2)(j)]

J. Federal enforceability

All terms and conditions of this permit are enforceable by the EPA administrator and by citizens under the FCAA, except for those terms and conditions designated in the permit as not federally enforceable. [WAC 173-401-625]

K. Inspection and entry

Upon presentation of credentials and other documents as may be required by law, Dynea Overlays shall allow the Puget Sound Clean Air Agency or an authorized representative to:

1. Enter Dynea Overlays' premises or where records must be kept under the conditions of this permit;
2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices or operations regulated or required under the permit; and
4. As authorized by WAC 173-400-105 and the FCAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [WAC 173-401-630(2)] [RCW 70.94.200, 1987, state/local only]

L. Compliance requirements

Dynea Overlays shall continue to comply with all applicable requirements with which the source is currently in compliance. Dynea Overlays shall meet on a timely basis any applicable requirements that become effective during the permit term. [WAC 173-401-630(3), WAC 173-401-510(2)(h)(iii)]

M. Compliance certifications

Dynea Overlays shall submit a certification of compliance with permit terms and conditions once per year. The first such certification shall cover a one-year period commencing upon the date of issuance of this permit. Each certification shall include:

1. The identification of each term or condition of the permit that is the basis of the certification;
2. The compliance status;
3. Whether compliance was continuous or intermittent; and
4. The method(s) used for determining the compliance status of the source, currently and over the reporting period. These methods must be consistent with the permit Monitoring, Maintenance and Recordkeeping Methods.

All compliance certifications shall be submitted to EPA Region 10 and to the Puget Sound Clean Air Agency, at the following addresses, within 30 days after the close of the period covered by the certification:

Puget Sound Clean Air Agency
Attn.: Operating Permit Certification
110 Union Street, Suite 500
Seattle, Washington 98101

EPA Region 10, Mail Stop OAQ-107
Attn.: Air Operating Permits
1200 Sixth Avenue
Seattle, Washington 98101

[WAC 173-401-630(5)]

N. Compliance determination

1. Emission Testing

- i) For the purpose of determining compliance with an emission standard, the Puget Sound Clean Air Agency or Ecology may conduct testing of an emission unit or require Dynea Overlays to have it tested. In the event the Puget Sound Clean Air Agency or Ecology conducts the test, Dynea Overlays shall be given an opportunity to observe the sampling and to obtain a sample at the same time. [PSCAA Reg. I, Section 3.05(b), WAC 173-400-105(4)]
- ii) Testing of sources for compliance with emission 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.
- iii) Unless otherwise specified, each test for pollutants other than opacity shall consist of three separate runs and compliance shall be determined from the arithmetic average of the three runs. In the event that a sample is accidentally lost or conditions occur in which one of the runs must be discontinued because of circumstances beyond the operator's control, compliance may, upon the Puget Sound Clean Air Agency approval, be determined from the arithmetic average of the two other runs.
- iv) Dynea Overlays shall notify the Puget Sound Clean Air Agency in writing at least 2 weeks (14 days) prior to any compliance test and provide the Puget Sound Clean Air Agency an opportunity to review the test plan and to observe the test.
- v) Dynea Overlays, if required by the Puget Sound Clean Air Agency to perform a compliance test, shall submit a report to the Puget Sound Clean Air Agency no later than 60 days after the test. The report shall include:
 - a) A description of the source and the sampling location;
 - b) The time and date of the test;
 - c) A summary of results, reported in units and for averaging periods consistent with the applicable emission standard;
 - d) A description of the test methods and quality assurance procedures employed;
 - e) The amount of fuel burned or raw material processed by the source during the test;
 - f) The operating parameters of the source and control equipment during the test;

- g) Field data and example calculations; and
- h) A statement signed by the senior management official of the testing firm certifying the validity of the source test report.

[WAC 173-400-105(4), PSCAA Reg. I, Sections 3.05(b) and 3.07]

2. Credible Evidence

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. [40 CFR 51.212, 40 CFR 52.12, 40 CFR 52.33, 40 CFR 60.11, 40 CFR 61.12]

O. Recordkeeping

Dynea Overlays shall maintain the following:

1. Records of required monitoring information that include the following if applicable:
 - i) The date, place as defined in the permit, and time of sampling or measurements;
 - ii) The date(s) analyses were performed;
 - iii) The company or entity that performed the analyses;
 - iv) The analytical techniques or methods used;
 - v) The results of such analyses; and
 - vi) The operating conditions existing at the time of sampling or measurement.
2. Records describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
3. Records of all monitoring data and support information required by this permit shall be retained by Dynea Overlays for a period of five years from the date of the monitoring, sample, measurement, record or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. [WAC 173-401-615(2)]

4. Dynea Overlays shall document all inspections, tests and other actions required by the O&M Plan and Section II.A of this permit, including who conducted the inspection, tests or other actions; and the date and the results of the inspection, tests or other actions including corrective actions. All such records shall be signed and dated. Dynea Overlays shall maintain records of all inspections, tests, and other actions required by the O&M Plan on site and available for Puget Sound Clean Air Agency review. [PSCAA Reg. I, Section 7.09(b), 9/12/96, 9/10/98 version local only]
5. Records for all complaints received concerning odor, fugitive emissions or nuisance relating to Section II of this permit must also contain the following information:
 - i) The date and time of the complaint,
 - ii) The name of the person complaining, if known,
 - iii) The nature of the complaint, and
 - iv) The date, time and nature of any corrective action taken.

[WAC 173-401-615(2)(b)]

P. Data recovery

The specific monitoring and recordkeeping requirements identified in Section II of this permit may contain data recovery requirements. However, if such requirements are silent on data recovery provisions, data recovery is assumed to be 100%. [WAC 173-401-615(1)(b)]

Q. Reporting

1. Any monitoring reports required by this permit to be submitted to Puget Sound Clean Air Agency Operating Permit Certification shall be submitted at least once every six months, or more frequently where required by an applicable requirement. The first required monitoring report shall be submitted six months after the date of issuance of this permit. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with WAC 173-401-520. Where an applicable requirement requires reporting more frequently than once every six months, the responsible official's certification needs to only be submitted once every six months, covering all required reporting since the date of the last certification, provided that the certification specifically identifies all documents subject to the certification. [WAC 173-401-615(3)(a)]

2. Dynea Overlays shall report in writing to Puget Sound Clean Air Agency Operating Permit Certification all instances of deviations from the permit requirements, including those attributable to upset conditions as defined in this permit, the probable cause of the deviations, and any corrective actions or preventive measures taken. Dynea Overlays shall maintain a contemporaneous record of all deviations. Dynea Overlays shall report any deviations to the Puget Sound Clean Air Agency that represent a potential threat to human health or safety by FAX (206-343-7522) as soon as possible but no later than 12 hours after such a deviation is discovered. Dynea Overlays shall report other deviations in writing to the Puget Sound Clean Air Agency Operating Permit Certification no later than 30 days after the end of the month during which the deviation is discovered. [WAC 173-401-615 (3)(b)]
3. Any application form, report, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. [WAC 173-401-520]

R. Emission reporting

Dynea Overlays shall report annually to the Puget Sound Clean Air Agency for those air contaminants during the previous calendar year that equal or exceed the following (tons per year):

Carbon monoxide (CO) emissions	25
Facility combined total of all toxic air contaminants (TAC) emissions	6
Any single toxic air contaminant (TAC) emissions	2
Nitrogen oxide (NOx) emissions	25
Particulate matter (PM10) emissions	25
Particulate matter (PM2.5) emissions	25
Sulfur oxide (SOx) emissions	25
Volatile organic compounds (VOC) emissions	25

Annual emissions rates shall be reported to the nearest whole ton per year for only those contaminants that equal or exceed the thresholds above. Dynea Overlays shall submit to the Puget Sound Clean Air Agency any additional information required by WAC 173-400-105(1) or Puget Sound Clean Air Agency Regulation III, Section 1.11. [PSCAA Reg. I, Section 7.09(a), 9/12/96, 9/10/98 version local only]

S. Emergencies

An emergency, as defined in WAC 173-401-645(l), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the conditions of WAC 173-401-645(3) are met.

The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

1. An emergency occurred for which Dynea Overlays can identify the cause(s) of the emergency;
2. The facility was, at the time, being properly operated;
3. During the period of the emergency, Dynea Overlays took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in the permit; and
4. Dynea Overlays submitted notice of the emergency to the Puget Sound Clean Air Agency within two (2) working days of the time when the emissions limitations were exceeded due to the emergency or shorter periods of time specified in an applicable requirement. This notice fulfills the requirement of WAC 173-401-615(3)(b) unless the excess emissions represent a potential threat to human health or safety. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

In any enforcement proceeding, Dynea Overlays has the burden of proof to establish the occurrence of an emergency. This provision is in addition to any emergency or upset provision contained in any applicable requirement. [WAC 173-401-645]

T. Unavoidable excess emissions

Excess emissions due to startup or shutdown conditions, scheduled maintenance or upsets that are determined to be unavoidable under the procedures and criteria in WAC 173-400-107 shall be excused and not subject to penalty. For any excess emission that Dynea Overlays wants the Puget Sound Clean Air Agency to consider unavoidable and excusable under WAC 173-400-107, Dynea Overlays shall report as required by Section V.Q.2 of this permit the following:

1. Why the event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition;
2. Why the event was not of a recurring pattern indicative of inadequate design, operation, or maintenance; and

3. How Dynea Overlays took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded. [WAC 173-400-107(2)]

U. Need to halt or reduce activity not a defense

It shall not be a defense for Dynea Overlays in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [WAC 173-401-620(2)(b)]

V. Stratospheric ozone and climate protection

1. Dynea Overlays shall comply with the following standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - i) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
 - ii) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
 - iii) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
2. Dynea Overlays may switch from any ozone-depleting substance to any alternative approved pursuant to the Significant New Alternatives Program (SNAP), 40 CFR Part 82, Subpart G, without a permit revision but shall not switch to a substitute listed as unacceptable pursuant to such program. [40 CFR 82.174]
3. Any certified technician employed by Dynea Overlays shall keep a copy of their certification at their place of employment. [40 CFR 82.166(1)]
4. Dynea Overlays shall not willfully release any regulated refrigerant and shall use refrigerant extraction equipment to recover regulated refrigerant when servicing, repairing or disposing of commercial air conditioning, heating, or refrigeration systems. Section V.V.4 is not federally enforceable. [RCW 70.94.970(2) and (4), 1991, state/local only]

W. RACT satisfied

Emission standards and other requirements contained in rules or regulatory orders in effect at the time of this permit issuance shall be considered RACT for the purposes of issuing this permit. [WAC 173-401-605(3), RCW 70.94.154, 1996, state/local only]

X. Risk management programs

In accordance with 40 CFR Part 68, Dynea Overlays shall comply with the following requirements no later than June 20, 1999:

1. Determine rule applicability and program eligibility requirements in accordance with the procedures described in 40 CFR 68.10 and 40 CFR 68.115.
2. Submit a certification statement to the Puget Sound Clean Air Agency that Dynea Overlays is in compliance with or exempt from all the requirements of 40 CFR Part 68, including registration (40 CFR 60.160) and submission of the risk management plan (40 CFR 68.150 to 68.185).

Y. Definitions

Unless otherwise defined in this permit, the terms used in this permit shall have the same meaning ascribed to them in the referenced regulation. [WAC 173-401-200]

Z. Duty to supplement or correct application

Upon becoming aware that it has failed to submit any relevant facts in a permit application or that it has submitted incorrect information in a permit application, Dynea Overlays shall promptly submit such supplementary facts or corrected information to the Puget Sound Clean Air Agency. [WAC 173-401-500(6)]

AA. Insignificant emission units and activities

1. Insignificant emission units and activities at Dynea Overlays are subject to all applicable requirements set forth in Sections I.A, III and IV. This permit shall not require testing, monitoring, reporting or recordkeeping for insignificant emission units or activities except as required by Puget Sound Clean Air Agency Regulation I, Sections 7.09(b) and 9.20. Compliance with Puget Sound Clean Air Agency Regulation I, Sections 7.09(b) and 9.20 shall be deemed to satisfy the requirements of WAC 173-401-615 and 173-401-630(1). [WAC 173-401-530(2)(c)]
2. For insignificant emission units and activities, Dynea Overlays does not need to certify compliance under WAC 173-401-630(5). [WAC 173-401-530(2)(d)]

3. An emission unit or activity that qualifies as insignificant solely on the basis of WAC 173-401-530(1)(a) shall not exceed the emission thresholds specified in WAC 173-401-530(4) until this permit is modified pursuant to Section VI.E of this permit and WAC 173-401-725. [WAC 173-401-530(6)]

VI. PERMIT ACTIONS

[Chapter 173-401 WAC, 11/4/93 version unless otherwise noted]

Permit Renewal, Revocation and Expiration

- (1) **Renewal application.** Dynea Overlays shall submit a complete permit renewal application to the Puget Sound Clean Air Agency no later than 12 months prior to the expiration of this permit. The Puget Sound Clean Air Agency will send Dynea Overlays a renewal application no later than 18 months prior to the expiration of this permit. Failure of the Puget Sound Clean Air Agency to send Dynea Overlays a renewal application shall not relieve Dynea Overlays from the obligation to file a timely and complete renewal application. [WAC 173-401-710(1), WAC 173-401-500(2)]
- (1) **Expired permits.** Permit expiration terminates Dynea Overlays' right to operate unless a timely and complete renewal application has been submitted consistent with WAC 173-401-710(1) and WAC 173-401-500. All terms and conditions of the permit shall remain in effect after this permit expires if a timely and complete permit application has been submitted. [WAC 173-401-710(3)]
- (2) **Revocation of permits.** The Puget Sound Clean Air Agency may revoke a permit only upon the request of Dynea Overlays or for cause. The Puget Sound Clean Air Agency shall provide at least thirty days written notice to Dynea Overlays prior to revocation of the permit or denial of a permit renewal application. Such notice shall include an explanation of the basis for the proposed action and afford Dynea Overlays an opportunity to meet with the Puget Sound Clean Air Agency prior to Puget Sound Clean Air Agency's final decision. A revocation issued under this condition may be issued conditionally with a future effective date and may specify that the revocation will not take effect if Dynea Overlays satisfies the specified conditions before the effective date. Nothing in this subsection shall limit Puget Sound Clean Air Agency's authority to issue emergency orders. [WAC 173-401-710(4)]

A. Administrative Permit Amendments

- (1) **Definition.** An "administrative permit amendment" is a permit revision that:
 - a) Corrects typographical errors;
 - b) Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at Dynea Overlays;
 - c) Requires more frequent monitoring or reporting by Dynea Overlays;

- d) Allows for a change in ownership or operational control of a source where the Puget Sound Clean Air Agency determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Puget Sound Clean Air Agency;
 - e) Incorporates into the permit the terms, conditions, and provisions from orders approving Notice of Construction applications processed under an EPA-approved program, provided that such a program meets procedural requirements substantially equivalent to the requirements of WAC 173-401-700, 173-401-725, and 173-401-800 that would be applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in WAC 173-401-600 through 173-401-650. [WAC 173-401-720(1)]
- (2) **Administrative permit amendment procedures.** An administrative permit amendment may be made by the Puget Sound Clean Air Agency consistent with the following:
- a) The Puget Sound Clean Air Agency shall take no more than sixty days from receipt of a request for an administrative permit amendment to take final action on such request, and may incorporate such changes without providing notice to the public or affected states provided that it designates any such permit revisions as having been made pursuant to this paragraph.
 - b) The Puget Sound Clean Air Agency shall submit a copy of the revised permit to EPA.
 - c) Dynea Overlays may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [WAC 173-401-720(3)]
- (3) **Permit shield.** The Puget Sound Clean Air Agency shall, upon taking final action granting a request for an administrative permit amendment, allow coverage by the permit shield in WAC 173-401-640 for administrative permit amendments made pursuant to part (1)(e) of this condition. [WAC 173-401-720(4)]

B. Changes not Requiring Permit Revisions

- (1) **General.**
- a) Dynea Overlays is authorized to make the changes described in this section without a permit revision, providing the following conditions are met:
 - i) The proposed changes are not Title I modifications as defined in WAC 174-401-200(33);
 - ii) The proposed changes do not result in emissions which exceed those allowable under the permit, whether expressed as a rate of emissions, or in total emissions;
 - iii) The proposed changes do not alter permit terms that are necessary to enforce limitations on emissions from units covered by the permit; and

- iv) Dynea Overlays provides EPA and the Puget Sound Clean Air Agency with written notification at least seven days prior to making the proposed changes except that written notification of a change made in response to an emergency shall be provided as soon as possible after the event.
 - b) Permit attachments. Dynea Overlays and the Puget Sound Clean Air Agency shall attach each notice to their copy of the relevant permit.
- (2) **Section 502(b)(10) changes.** Pursuant to the conditions in subsection (1) of this section, Dynea Overlays is authorized to make section 502(b)(10) changes (as defined in WAC 173-401-200(28)) without a permit revision.
- a) For each such change, the written notification required under subsection (1)(a)(iv) of this condition shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
 - b) The permit shield authorized under WAC 173-401-640 shall not apply to any change made pursuant to this paragraph.
- (3) **SIP authorized emissions trading.** Pursuant to the conditions in subsection (1) of this condition, Dynea Overlays is authorized to trade increases and decreases in emissions in the permitted facility, where the Washington state implementation plan provides for such emissions trades without requiring a permit revision. This provision is available in those cases where the permit does not already provide for such emissions trading.
- a) Under this subsection (3), the written notification required under subsection (1)(a)(iv) of this condition shall include such information as may be required by the provision in the Washington state implementation plan authorizing the emissions trade, including at a minimum, when the proposed change will occur, a description of each such change, any change in emissions, the permit requirements with which Dynea Overlays will comply using the emissions trading provisions of the Washington state implementation plan, and the pollutants emitted subject to the emissions trade. The notice shall also refer to the provisions with which Dynea Overlays will comply in the applicable implementation plan and that provide for the emissions trade.
 - b) The permit shield described in WAC 173-401-640 shall not extend to any change made under this paragraph. Compliance with the permit requirements that Dynea Overlays will meet using the emissions trade shall be determined according to requirements of the applicable implementation plan authorizing the emissions trade. [WAC 173-401-722]

C. Off Permit Changes

- (1) Dynea Overlays shall be allowed to make changes not specifically addressed or prohibited by the permit terms and conditions without requiring a permit revision, provided that the proposed changes do not weaken the enforceability of existing permit conditions. Any change that is a Title I modification or is a change subject to the acid rain requirements under Title IV of the FCAA must be submitted as a permit revision.
- (2) Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition.
- (3) Dynea Overlays must provide contemporaneous written notice to the Puget Sound Clean Air Agency and EPA of each such change, except for changes that qualify as insignificant under WAC 173-401-530. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
- (4) The change shall not qualify for the permit shield under WAC 173-401-640.
- (5) Dynea Overlays shall keep a record describing changes made at Dynea Overlays that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- (6) When making a change under this section, Dynea Overlays shall comply with applicable preconstruction review requirements established pursuant to RCW 70.94.152 and Puget Sound Clean Air Agency Regulation I, Article 6. [WAC 173-401-724]

D. Permit Modification

- (1) **Definition.** A permit modification is any revision to this permit that cannot be accomplished under provisions for administrative permit amendments under WAC 173-401-720.
- (2) **Procedures.** Minor permit modification procedures.
 - a) Criteria.
 - i) Minor permit modification procedures shall be used for those permit modifications that:
 - a) Do not violate any applicable requirement;
 - b) Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
 - c) Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;

- d) Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that Dynea Overlays has assumed to avoid an applicable requirement to which Dynea Overlays would otherwise be subject. Such terms and conditions include:
 - (1) A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the FCAA; and
 - (2) An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the FCAA;
- e) Are not modifications under any provision of Title I of the FCAA;
- ii) Notwithstanding (a)(i) of this subsection, and subsection (3) of this section, the Puget Sound Clean Air Agency may allow the use of minor permit modification procedures for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that the use of such minor permit modification procedures is explicitly provided for in the Washington state implementation plan or in applicable requirements promulgated by EPA and in effect on April 7, 1993.
- b) Application. An application requesting the use of minor permit modification procedures shall meet the requirements of WAC 173-401-510 and shall include the following:
 - i) A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
 - ii) Dynea Overlays's suggested draft permit;
 - iii) Certification by a responsible official, consistent with WAC 173-401-520, of the truth, accuracy, and completeness of the application and that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
 - iv) Completed forms for the Puget Sound Clean Air Agency to use to notify EPA and affected states as required under WAC 173-401-810 and 173-401-820.
- c) Dynea Overlays's ability to make change. Dynea Overlays may make the change proposed in its minor permit modification application immediately after it files such application provided that those changes requiring the submissions of a Notice of Construction application have been reviewed and approved by the Puget Sound Clean Air Agency. After Dynea Overlays makes the change allowed by the preceding sentence, and until the Puget Sound Clean Air Agency takes any of the actions specified in WAC 173-401-725(d), Dynea Overlays must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time period, Dynea Overlays does not need to comply with the existing

permit terms and conditions it seeks to modify. However, if Dynea Overlays fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it.

- d) Permit shield. The permit shield under WAC 173-401-640 shall not extend to minor permit modifications.
- (3) **Group processing of minor permit modifications.** Consistent with WAC 173-401-725(3), the Puget Sound Clean Air Agency may process groups of a source's applications for certain modifications eligible for minor permit modification processing.
- (4) **Significant modification procedures.**
- a) Criteria. Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative permit amendments. Every significant change in existing monitoring permit terms or conditions and every relaxation of reporting or recordkeeping permit terms or conditions shall be considered significant. Nothing herein shall be construed to preclude Dynea Overlays from making changes consistent with Chapter 173-401 WAC that would render existing permit compliance terms and conditions irrelevant.
 - b) Significant permit modifications shall meet all requirements of Chapter 173-401 WAC, including those for applications, public participation, review by affected states, and review by EPA, as they apply to permit issuance and permit renewal. The Puget Sound Clean Air Agency shall complete review on the majority of significant permit modifications within nine months after receipt of a complete application. [WAC 173-401-725]

E. Reopening for Cause

- (1) **Standard provisions.** This permit shall be reopened and revised under any of the following circumstances:
- a) Additional applicable requirements become applicable to Dynea Overlays with a remaining permit term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j);
 - b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit;
 - c) The Puget Sound Clean Air Agency, or EPA, determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or

- d) The Puget Sound Clean Air Agency or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (2) **Procedures.** Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
- (3) **Notice.** Reopenings under this section shall not be initiated before a notice of such intent is provided to Dynea Overlays by the Puget Sound Clean Air Agency at least thirty days in advance of the date that the permit is to be reopened, except that the Puget Sound Clean Air Agency may provide a shorter time period in the case of an emergency. [WAC 173-401-730]

VII. PERMIT SHIELD

Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements contained in Sections I through VI of this permit that are specifically identified in this permit as of the date of permit issuance. [WAC 173-401-640(1)]

Nothing in this permit shall alter or affect the following:

- (1) The provisions of Section 303 of the FCAA (emergency orders), including the authority of the administrator under that section;
- (2) The liability of an owner or operator of Dynea Overlays for any violation of applicable requirements prior to or at the time of permit issuance;
- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the FCAA;
- (4) The ability of EPA to obtain information from a source pursuant to Section 114 of the FCAA; or
- (5) The ability of the Puget Sound Clean Air Agency to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in chapter 252, Laws of 1993.

[WAC 173-401-640(4)]

VIII. INAPPLICABLE REQUIREMENTS

As of the date of permit issuance, the requirements listed below do not apply to Dynea Overlays, Inc., or to the specific emissions units specified below for the reasons indicated. The permit shield applies to all requirements so identified. [WAC 173-401-640(2)]

Reqmt. No.	Requirement	Adoption or Effective Date	Description and Reason for Inapplicability
VIII.1.	WAC 173-400-050-(2)	3/22/91	Requirement to limit carbonyls emissions to 100 ppmv from incinerators. Dynea Overlays does not have any incinerators and would need a notice of construction permit to install one.
VIII.2.	Chapter 173-434 WAC	10/18/90	Solid Waste Incinerator Facility rules. Dynea Overlays does not have any solid waste incinerators and would need a notice of construction permit to install one.

Reqmt. No.	Requirement	Adoption or Effective Date	Description and Reason for Inapplicability
VIII.3.	40 CFR Part 60: Subpart K Subpart Ka Subpart Kb Puget Sound Clean Air Agency Reg. II: Section 2.04	6/11/73 5/18/78 7/23/84 6/13/91	Standards of Performance for VOC Storage Vessels, Dynea Overlays does not have any storage tanks with a storage capacity of 40 m ³ (10570 gal) or greater and would need a notice of construction permit to install one.
VIII.4.	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).

IX. COMPLIANCE TEST METHODS

Puget Sound Clean Air Agency Method 5

Ecology Method 9A