Notice of Construction Application

A notice of construction permit is required before installing a new source of air pollution or modifying an existing source of air pollution. This application applies to facilities in Ecology's jurisdiction. Submit this application for review of your project. For general information about completing the application, refer to Ecology Forms ECY 070-410a-g, "Instructions for Ecology's Notice of Construction Application."

Ecology offers up to two hours of free pre-application assistance. We encourage you to schedule a pre-application meeting with the contact person specified for the location of your proposal, below. If you use up your two hours of free pre-application assistance, we will continue to assist you after you submit Part 1 of the application and the application fee. You may schedule a meeting with us at any point in the process.

Upon completion of the application, please enclose a check for the initial fee and mail to:

Department of Ecology
Cashiering Unit
PO Box 47611
Olympia, WA 98504-7611

For Fiscal Office Use Only: 0299-3030404-B00-216--001--000404

Check the box for the location of your proposal. For assistance, call the appropriate office listed below:

Check box	Ecology Permitting Office	Contact
☐	**Chelan, Douglas, Kittitas, Klickitat, or Okanogan County** Ecology Central Regional Office (509) 575-2490	Lynnette Haller (509) 457-7126 lynnette.haller@ecy.wa.gov
☑	**Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Stevens, Walla Walla, or Whitman County** Ecology Eastern Regional Office (509) 329-3400	Karin Baldwin (509) 329-3452 karin.baldwin@ecy.wa.gov
☐	**San Juan County** Ecology Northwest Regional Office (206) 594-0000	David Adler (425) 649-7267 david.adler@ecy.wa.gov
☐	**For actions taken at Kraft and Sulfite Paper Mills and Aluminum Smelters Only** Ecology Industrial Section (360) 407-6900	James DeMay (360) 407-6868 james.demay@ecy.wa.gov
☐	**For actions taken on the US Department of Energy Hanford Reservation Only** Ecology Nuclear Waste Program (509) 372-7950	Lilyann Murphy (509) 372-7951 lilyann.murphy@ecy.wa.gov

Check the box below for the fee that applies to your application.

New project or equipment:

- ☐ **$1,904: Basic project** initial fee covers up to 16 hours of review.
- ☐ **$12,614: Complex project** initial fee covers up to 106 hours of review.

Change to an existing permit or equipment:

- ☑ **$357: Administrative or simple change** initial fee covers up to 3 hours of review. Ecology may determine your change is complex during the completeness review of your application. If you project is complex, you must pay the additional xxx before we will continue working on your application
- ☐ **$1,190: Complex** change initial fee covers up to 10 hours of review
- ☐ **$350flat fee**: Replace or alter control technology equipment under WAC 173-400-114. Ecology will contact you if we determine your change belongs in another fee category. You must pay the fee associated with that category before we will continue working on your application.

Read each statement below, then check the box next to it to acknowledge that you agree.

- ☑ The initial fee you submitted may not cover the cost of processing your application. Ecology will track the number of hours spent on your project. If the number of hours Ecology spends exceeds the hours included in your initial fee, Ecology will bill you $119 per hour for the extra time.
- ☑ You must include all information requested by this application. Ecology may not process your application if it does not include all the information requested.
- ☑ Submittal of this application allows Ecology staff to visit and inspect your facility.

Part 1: General Information

I. Project, Facility, and Company Information

1. Project Name: Modification to Approval Order No. 14AQ-E597
2. Facility Name: Terex Washington Moses Lake
3. Facility Street Address:
   8987 Graham Road NE Building 5820
4. Facility Legal Description: Terex Washington Moses Lake
5. Company Legal Name (if different from Facility Name):
6. Company Mailing Address (street, city, state, zip)

   8987 Graham Road NE Building 5820

II. Contact Information and Certification

1. Facility Contact Name (who will be onsite): Kent Stephens

3. Facility Contact Phone Number: 509-762-3308
4. Facility Contact E-mail: Kent.Stephens@Terex.com
5. Billing Contact Name (who should receive billing information):
   Kent Stephens
6. Billing Contact Mailing Address (if different Company Mailing Address):

7. Billing contact Phone Number: 509-762-3308
8. Billing Contact E-mail: Kent.Stephens@Terex.com
9. Consultant Name (optional – if 3rd party hired to complete application elements):
10. Consultant Organization/Company:
11. Consultant Mailing Address (street, city, state, zip):
12. Consultant Phone Number:
13. Consultant E-mail:
14. Responsible Official Name and Title (who is responsible for project policy or decision making):
    Jon Lyddon
15. Responsible Official Phone: 206-348-3370
16. Responsible Official E-mail: Jon.Lyddon @Terex.com
17. Responsible Official Certification and Signature:

    I certify that the information on this application is accurate and complete.

Signature:  Date: 4/11/25

Part 2: Technical Information

The Technical Information may be sent with this application form to the Cashiering Unit, or may be sent directly to the Ecology regional office with jurisdiction along with a copy of this application form.

For all sections, check the box next to each item as you complete it.

III. Project Description

- [x] Written narrative describing your proposed project.
- [ ] Projected construction start and completion dates.
- [ ] Operating schedule and production rates.
- [ ] List of all major process equipment and manufacturer and maximum rated capacity.
- [ ] Process flow diagram with all emission points identified.
- [ ] Plan view site map.
- [ ] Manufacturer specification sheets for major process equipment components
- [ ] Manufacturer specification sheets for pollution control equipment.
- [ ] Fuel specifications, including type, consumption (per hour and per year) and percent sulfur.

IV. State Environmental Policy Act (SEPA) Compliance

Check the appropriate box below.

- [ ] SEPA review is complete. Include a copy of the final SEPA checklist and SEPA determination (e.g., DNS, MDNS, and EIS) with your application.
- [ ] SEPA review has not been conducted:
  - [ ] If review will be conducted by another agency, list the agency. You must provide a copy of the final SEPA checklist and SEPA determination before Ecology will issue your permit. Agency reviewing SEPA: _____
  - [ ] If the review will be conducted by Ecology, fill out a SEPA checklist and submit it with your application. You can find a SEPA checklist online at https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-document-templates

V. Emissions Estimations of Criteria Pollutants

Does your project generate criteria air pollutant emissions? [ ] **Yes** [ ] **No**

If yes, please proved the following information regarding your criteria emissions in the application.

- [ ] The names of the criteria air pollutants emitted (i.e., NO_X, SO_2, CO, $PM_{2.5}$, PM_{10}, TSP, VOC, and Pb)
- [ ] Potential emissions of criteria air pollutants in tons per hour, tons per day, and tons per year (include calculations)
- [ ] If there will be any fugitive criteria pollutant emissions, clearly identify the pollutant and quantity

VI. Emissions Estimations of Toxic Air Pollutants

Does your project generate toxic air pollutant emissions? [ ] **Yes** [ ] **No**

- ☐ The names of the toxic air pollutants emitted (specified in WAC 173-460-150[1])
- ☐ Potential emissions of toxic air pollutants in pounds per hour, pounds per day, and pounds per year (include calculations)
- ☐ If there will be any fugitive toxic air pollutant emissions, clearly identify the pollutant and quantity

VII. Emission Standard Compliance

- ☐ Provide a list of all applicable new source performance standards, national emission standards for hazardous air pollutants, national emission standards for hazardous air pollutants for source categories, and emission standards adopted under Chapter 70A.15 RCW.

Does your project comply with all applicable standards identified? ☐ **Yes** ☐ **No**

VIII. Best Available Control Technology

- ☐ Provide a complete evaluation of Best Available Control Technology (BACT) for your proposal.

IX. Ambient Air Impacts Analyses

Please provide the following:

- ☐ Ambient air impacts analyses for Criteria Air Pollutants (including fugitive emissions)
- ☐ Ambient air impacts analyses for Toxic Air Pollutants (including fugitive emissions)
- ☐ Discharge point data for each point included in air impacts analyses (include only if modeling is required)
  - ☐ Exhaust height
  - ☐ Exhaust inside dimensions (ex. diameter or length and width)
  - ☐ Exhaust gas velocity or volumetric flow rate
  - ☐ Exhaust gas exit temperature
  - ☐ The volumetric flow rate
  - ☐ Description of the discharges (i.e., vertically or horizontally) and whether there are any obstructions (ex., raincap)
  - ☐ Identification of the emission unit(s) discharging from the point
  - ☐ The distance from the stack to the nearest property line
  - ☐ Emission unit building height, width, and length
  - ☐ Height of tallest building on-site or in the vicinity and the nearest distance of that building to the exhaust
  - ☐ Whether the facility is in an urban or rural location

Does your project cause or contribute to a violation of any ambient air quality standard or acceptable source impact level? ☐ **Yes** ☐ **No**

TEREX
CORPORATION

Kent Stephens
Senior HSE Manager
Telephone: (509) 762-3308
E-mail: kent.stephens@terex.com

Jenny Filipy
Department of Ecology
Commercial/Industrial Unit
Regional Air Quality Section

Re: Permit Amendment Request

Genie Industries located in Moses Lake Washington currently operates under Approval Order No. 15AQ-E639. We wish to amend testing requirements specific to section 14.1.

Attached is a Table (Table 1.0) that contains test results from the past six years (2020 and 2021 impacted from COVID) and the averages for those periods. The results show that we are operating less than half of our permit limits. As a result, we are requesting reducing the source test from annually, to every 3 years under the same conditions listed in section 14.1.1, 14.1.2, 14.1.3.

Additionally, Genie would like to update the permit to reflect the current conditions, as the original permit was issued in 2016. Attached is a copy of the existing order with sections highlighted to reflect current conditions or proposes changes.

Also included is a Notice of Construction Application with a project description and company information Sections IV – IX are left blank as the project does not alter any of the previously identified items.

If you need additional information with respect to this request, please contact me at Kent.Stephens@Terex.com of 509-762-3308.

x K t Steph

Kent Stephens
SR HSE Manager Genie Industries Moses Lake

TEREX CORPORATION

TABLE 1.0

Summary of Performance Test Results (lb/hr)

	2024			2023			2022			2019			2018			2017			Average Total PM (lb/hr)	Permit Limit PM_{10} (lb/hr)	Permit Limit $PM_{2.5}$ (lb/hr)	Percent of permit limit
VS1 Paint	0.076	0.07		0.26	0.301	0.211	0.172	0.164	0.168	0.120	0.077	0.090	0.140	0.160	0.140	0.100	0.180	0.460	0.17	0.30	0.30	56%
VS1 Blast	0.046	0.033	0.035				0.161	0.073	0.104	0.061	0.072	0.086							0.07	0.16	0.14	44%
VS1 Wash							0.169	0.125	0.146	0.102	0.103	0.057							0.12	ot Specifie	ot Specifie	VS1 Wash
VS3 Blast													0.180	0.210	0.160				0.18	0.50	0.44	36%
VS4 Blast				0.099	0.093	0.11										0.07	0.3	0.14	0.14	0.50	0.44	28%
VS 4 Wash	0.045	0.033	0.042													0.380	0.320	0.070	0.15	0.30	0.24	50%

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

IN THE MATTER OF APPROVING A PROCESS USE INCREASE FOR TEREX WASHINGTON INC. MOSES LAKE OPERATIONS	))))	**Synthetic Minor Approval Order No. 15AQ-E639**

TO: Glenn Gere, Senior Director of Operations – Moses Lake
Terex Washington/Genie Industries
8987 Graham Road NE, Bldg 5820
Moses Lake WA, 98837

Equipment evaluated for this Approval Order consists of the following:

1.1 **Facility-wide equipment:**

1.1.1 Welding activities (production-welding work station operations occur in all four High Bays).

1.1.2 Burnoff Oven (located outside of the northwest corner of High Bay 1) manufactured by Guspro. 2 MMBtu/hr primary combustion chamber and 2 MMBtu/hr incorporated thermal oxidizer (afterburner), natural gas fueled, Stack ID 46.

1.2 **High Bay 1 equipment:**

1.2.1 Solvent Paint Booths 1 & 2, each with 6.0 MMBtu/hr of natural gas input, Stack ID 1, 2 & 4, 5.

1.2.2 1-Becca MFG or equivalent closed-system spray gun cleaning station.

Commented [SK1]: No longer in use

1.2.3 1-Becca MFG or equivalent closed-system solvent recovery distillation unit.

1.2.4 Cure Ovens 1 & 2, each with 1.0 MMBtu/hr of natural gas input, Stack ID 3, 6.

1.2.5 Wash Booths 1 & 2, JBI, 12,500 cfm each, Stack ID 10 & 11.

1.2.6 Pressure Washers 1 & 2, each with 0.75 MMBtu/hr natural gas input, Stack ID 7 & 8.

Commented [KS2]: These have been converted to electric

1.2.7 USF Wheelblast using S-230 Steel Shot, with Dust Hog model SBD 36-3 baghouse with 13,000 cfm of exhaust flow, Stack ID 9.

1.2.8 MUA-H1, (4x) each 4.4 MMBtu/hr of natural gas input, space heating exhausting directly into the building.

1.2.9 Four (4) general building exhaust vents, each 10,000 cfm, Stack ID 17, 18, 19, & 20.

1.3 **Low Bay 1 equipment:**

1.3.1 MUA-L1-1, 0.3 MMBtu/hr of natural gas input, space heating exhausting directly into the building.

1.3.2 HV-L1, 0.3 MMBtu/hr of natural gas input, space heating exhausting directly into the building

1.4 **Low Bay 2 equipment:**

1.4.1 HV-L2, 0.3 MMBtu/hr of natural gas input, space heating exhausting directly into the building.

1.5 **High Bay 2 equipment:**

1.5.1 1-two-head laser/plasma cutting station, controlled with a fabric filter vented to the workspace air, Merv-14 filters

1.5.2 1 Wash Booth, Global Finishing Systems, 5,000 cfm, Stack ID 12.

Commented [KS3]: No longer laser/plasma cutting. Equipment has been removed

1.5.3 Pressure Washer, Electrically Heated.

1.5.4 Dry Oven, Electrically Heated

1.5.5 Powder Coating Line – 3 powder application booths (primer, Top Coat, and Custom Top Coat) with 98% filtration, filter air returned indoors.

1.5.6 Gel oven, electrically heated, Stack ID 13.

1.5.7 2 cure ovens each electrically heated, Stack ID 13.

1.5.8 MUA-H2, (4x) each 4.4 MMBtu/hr of natural gas input, space heating exhausting directly into the building.

1.5.9 MUA-H2, 0.2 MMBtu/hr of natural gas input, space heating exhausting directly into the building.

1.5.10 Four (4) general building exhaust vents, each 10,000 cfm, Stack ID 21, 22, 23, and 24.

1.6 **Low Bay 3 equipment:**

1.6.1 MUA-L3-1, 0.4 MMBtu/hr of natural gas input, space heating exhausting directly into the building.

1.7 **High Bay 3 equipment:**

1.7.1 MUA-H3, (4x) each 4.4 MMBtu/hr of natural gas input, space heating exhausting directly into the building.

1.7.2 Blastec Shot Blast-Wheel Slung, with Farr 26,000 cfm dust collector, Stack ID 33.

1.7.3 Wash Booth, Colmet 12,500 cfm, Stack ID 34.

1.7.4 2 Dry Ovens, Rapid Engineering, 2.5 MMBtu each, Stack ID 35 and 36.

1.7.5 Powder Booth (Primer), Colmet Filter 20,000 CFM, MERV 12 primary filters, MERV 13 secondary filters, air return to workspace.

1.7.6 Powder Booth (Top Coat), Colmet Filter 20,000 CFM, MERV 12 primary filters, MERV 13 secondary filters, air return to workspace.

1.7.7 3 Cure Ovens, Rapid Engineering, 2.5 MMBtu/hr each, Stack ID 37, 38, and 39.

1.7.8 Four (4) general building exhaust vents, each 10,000 cfm, Stack ID 25, 26, 27, and 28.

1.8 **High Bay 4 equipment:**

1.8.1 MUA-H4, (4x) each 4.4 MMBtu/hr of natural gas input, space heating exhausting directly into the building.

1.8.2 Blastec Shot Blast-Wheel Slung, with Farr 26,000 cfm dust collector, Stack ID 40.

1.8.3 2 Wash Booth, Bleeker Brothers, 7,000 cfm each, Stack ID 41.

1.8.4 2 Dry Ovens, Oven Pack LE (OPLE), 1.5 MMBtu/hr each, Stack ID 42.

1.8.5 Powder Booth (Primer), Parker Ionics, 20,000 CFM, MERV 12 primary filters, MERV 13 secondary filters, air return to workspace.

1.8.6 Powder Booth (Top Coat), Parker Ionics, 20,000 CFM, MERV 12 primary filters, MERV 13 secondary filters, air return to workspace.

1.8.7 2 Cure Ovens (4 burners total), Oven Pack LE (OPLE), 2.5 MMBtu/hr each burner, Stack ID 44 and 45.

1.8.8 Four (4) general building exhaust vents, each 10,000 cfm, Stack ID 29, 30, 31, and 32.

In relation to the above, the Department of Ecology, State of Washington, pursuant to Revised Code of Washington (RCW) 70.94.152, and Washington Administrative Code (WAC) 173-400-110, makes the following determinations:

1. The proposed facility, consisting only of the equipment listed above, if constructed and operated as herein required, will be in accordance with applicable rules and regulations, as set forth in Chapter 173-400 WAC, and Chapter 173-460 WAC, and the operation thereof, at the location proposed, will not result in ambient air quality standards being exceeded.

2. The proposed facility, consisting only of the equipment listed above, if constructed and operated as herein required, will provide all known, available and reasonable methods of emission control.

THEREFORE, IT IS ORDERED that the facility as described in Notices of Construction and more specifically detailed in plans, specifications and other information submitted to the Department of Ecology in reference thereto, is approved for construction, installation and operation, provided the following conditions are met:

APPROVAL CONDITIONS

1. ADMINISTRATIVE CONDITION

1.1 NOC Approval Order No. 15AQ-E624 issued September 28, 2015 is rescinded and replaced by this Approval Order No. 15AQ-E639.

2. FACILITY-WIDE

2.1 Any modification to the equipment described in the NOC applications and listed above, or the equipment operating procedures, shall be reported to Ecology and may require another NOC application.

2.2 Usage of welding wire or other welding electrode shall not exceed 2.08 million pounds in any 12 month period.

2.3 Facility-wide emissions of TAPs shall not exceed the values in Table 1, calculated using Ecology-approved emission factors.

Table 1: Facility-wide TAP Emission Limits

CAS No.	**Toxic Air Pollutant**	**lb/year**	**lb/hr**
	Manganese and Manganese Compounds	202	0.032
7440-48-4	Cobalt	4.1	5.4E-4
	Copper and Copper Compounds	1,642	0.219
630-08-0	Carbon Monoxide	44,900	8.2
10102-44-0	Nitrogen Dioxide	6200	1.0

3. EMISSION LIMITS & ASSOCIATED PERFORMANCE TESTING

Emission limits (from any exhaust stack venting uncontrolled activities):

3.1 Opacity shall not exceed 10 percent, averaged over a six-minute period.

3.2 Total PM shall not exceed 0.1 grains per dry standard cubic foot (filterable + condensable portions).

Emission limits (from any exhaust stack venting controlled activities):

3.3 Opacity shall not exceed 5 percent, averaged over a six-minute period.

3.4 Total PM shall not exceed 0.005 grains per dry standard cubic foot (filterable + condensable portions).

Associated performance testing conditions:

3.5 Opacity: Testing for opacity may be required by Ecology at any time after initial equipment startup. Such testing shall be per 40 CFR 60, Appendix A, Method 9.

3.6 Total PM: Testing for Total PM may be required in the future upon written notification by Ecology if the above opacity emission limits are exceeded. If required, Total PM testing shall be conducted per Approval Condition 14.3.

4. USAGE LIMITS

4.1 Fuel Consumption

4.1.1 Only natural gas shall be consumed in the combustion equipment approved by this regulatory order.

4.1.2 The quantity of natural gas combusted by the equipment approved by this order is not limited.

5. SPECIFIC CONDITIONS

Facility-Wide Coatings and Solvent Use

5.1 Coatings and Solvent Consumption

5.1.1 VOC emissions from coating and solvent use (primarily the High Bay 1 solvent coating booths) shall be limited to 90 tons during any 12 consecutive month period.

5.1.2 Facility–wide total HAP emissions shall be limited to 24 tons during any 12 consecutive month period. The permittee shall notify Ecology when any month's accounting indicates 12 tons aggregate HAPs have been emitted in the preceding 12 consecutive month period.

5.1.3 Facility-wide emissions of any single HAP shall be limited to 9.0 tons during any 12 consecutive month period. The permittee shall notify Ecology when any month's accounting indicates 5 tons of any single HAP has been emitted in the preceding 12 consecutive month period.

5.1.4 Facility-wide total TAP emissions shall be limited to 99 tons during any 12 consecutive month period. The permittee shall notify Ecology upon the first month that accounting indicates 50 tons aggregate TAPs have been emitted in the preceding 12 consecutive month period.

5.1.4.1 Individual TAPs shall be limited as follows.

Table 2 –Facility-wide Solvent Coating TAP Emission Limits

CAS No.	**Toxic Air Pollutant**	**lb/year**	**lb/hr**
67-63-0	Isopropyl Alcohol	37,500	5
78-93-3	Methyl Ethyl Ketone	18,000	5
100-41-4	Ethyl Benzene	76.8	0.025
108-88-3	Toluene	18,000	5
67-56-1	Methanol	18,000	5
822-06-0	Hexamethylene-Di-Isocyanate	55.8	0.009
1330-20-7	Xylenes	9,000	1.2
111-76-2	Ethylene Glycol MonoButyl Ether	37,500	5
98-82-8	Cumene	16,437	2.2
80-62-6	Methyl Methacrylate	18,000	3.8

5.1.5 Any planned use of coatings and/or solvents that exceeds the above emission rates shall be reported to Ecology and will require submittal and approval of a revised NOC application, prior to such use.

5.1.6 Any change in the coatings and/or solvents that result in emissions of TAPs or HAPs that are not listed in Table 2 shall be reported to Ecology and will require submittal and approval of a revised NOC application, prior to such use.

5.2 The High Bay 1 solvent paint booths shall operate for no more than 7500 hours in any 12 month period. Hours of operation shall be monitored in accordance with Condition 15.1.

5.3 An electrical interlock (or other fail safe device) or an operational requirement as specified in the O&M manual shall be in place on each paint booth and spray/cure booth

to prevent its operation in the event the respective exhaust filtration system is not running.

5.4 Each paint booth and spray/cure booth shall have a differential pressure gauge (scaled in inches of water column) and an alarm monitor installed across the inlet and outlet of the exhaust filter. The differential pressure alarm monitor at each booth shall be set at the filter manufacturer's recommended pressure drop reading for filter replacement.

5.5 The mass emission rate of PM_{10} (=$PM_{2.5}$) in the exhaust of any one of the 4 stacks (stacks 1,2, 4, or 5) shall not exceed 0.3 pounds per hour, measured in accordance with Conditions 14.2 and 14.3.

5.6 The coatings to be spray painted shall have no more than ten (10) weight percent added solvent.

5.7 All paint spray guns used shall be an air-assisted, airless type, or equivalent, with a transfer efficiency comparable to a "High Volume Low Pressure" (HVLP) type spray gun.

5.8 Air being drawn from each paint booth and spray/cure booth shall be filtered prior to being exhausted. Each booth exhaust filtration system shall be capable of at least a 98% capture efficiency.

5.9 Air being drawn from each paint booth shall be exhausted vertically upward through an exhaust stack without constrictions such as rain caps.

5.10 All spray gun cleaning shall be conducted using the Becca enclosed gun cleaner or equivalent. No solvent spraying is authorized outside of the closed-system gun cleaner.

Commented [KS4]: Becca gun cleaner no longer in use. All gun cleaning is conducted at the gun cleaning station located inside the paint booth.

5.11 High Bay 1 USF Wheel Slung Shot Blast

5.11.1 All abrasive blasting utilizing the USF Wheel Slung Shot Blast shall be conducted within an enclosure that captures any potential emissions and vents the emissions through the 21,000 acfm Dust Hog filter.

5.11.2 The High Bay 1 shot blast fabric filter shall be equipped with the manufacturer's recommended filter failure instrumentation. The filter failure instrumentation shall be easily visible to plant personnel, shall have the manufacturer's acceptable operating range clearly indicated, and shall be checked at a minimum of once during each shift while the shot blast system is in use.

5.11.3 The High Bay 1 shot blasting shall be conducted for no more than 7500 hours in any 12 month period. Hours of blasting operation shall be monitored in accordance with Condition 15.1.

5.11.4 Emissions from the baghouse catch system shall not be visible.

5.11.5 The mass emissions rate of PM_{10} in the exhaust of the High Bay 1 shot blast shall not exceed 0.16 pounds per hour measured in accordance with Conditions 14.2 and 14.3.

5.11.6 The mass emissions rate of $PM_{2.5}$ in the exhaust of the High Bay 1 shot blast shall not exceed 0.14 pounds per hour measured in accordance with Conditions 14.2 and 14.3.

6. Guspro Burn-off Oven and Afterburner (exhausts outside High Bay 1)

6.1 The Guspro Burn-off oven shall operate no more than 5600 hours in any 12 month period, or more than 16 hours in any day (excluding periods of cool down when no fuel is introduced to the burner(s)), monitored in accordance with Condition 15.1.

6.2 The afterburner controlling the burn-off oven shall be maintained at a minimum temperature of 1400 degrees Fahrenheit at all times that the burn-off oven is charged (excluding periods of cool down when no fuel is introduced to the burner(s)).

6.3 The thermocouple at the base of the stack shall produce a continuous temperature record that shall be provided to Ecology on request.

6.4 The emission rate of PM_{10} (=$PM_{2.5}$) from the burnoff oven shall not exceed 0.10 pounds per hour measured in accordance with Conditions 14.2. and 14.3.

7. High Bay 2 Laser Cutting

7.1 The laser cutting activities in High Bay 2 shall be conducted for no more than 7500 hours in any 12 month period monitored in accordance with Condition 15.1.

Commented [KS5]: Delete - No longer in use

7.2 The mass emission rate of PM_{10} (=$PM_{2.5}$) in the exhaust of the laser cutting activities in High Bay 2 (venting to the workspace air) shall not exceed 0.084 pounds per hour measured in accordance with Conditions 14.2 and 14.3.

8. High Bay 2 Wash Booth

8.1 The High Bay 2 wash booth shall be operated for no more than 7500 hours in any 12 month period. Hours of wash booth operation shall be monitored in accordance with Condition 15.1.

8.2 The mass emission rate of PM_{10} in the exhaust of the High Bay 2 wash booth shall not exceed 0.130 pounds per hour measured in accordance with Conditions 14.2 and 14.3.

8.3 The mass emission rate of $PM_{2.5}$ in the exhaust of the High Bay 2 wash booth shall not exceed 0.10 pounds per hour measured in accordance with Conditions 14.2 and 14.3.

9. High Bay 3 Shot Blast

9.1 The High Bay 3 shot blasting shall be conducted for no more than 7500 hours in any 12 month period. Hours of blasting operation shall be monitored in accordance with Condition 15.1.

9.2 The mass emission rate of PM_{10} in the exhaust of the Farr Fabric Filter controlling emissions from the High Bay 3 Wheel Slung Shot Blast operation shall not exceed 0.5 pounds per hour measured in accordance with Conditions 14.2 and 14.3.

9.3 The mass emission rate of $PM_{2.5}$ in the exhaust of the Farr Fabric Filter controlling emissions from the High Bay 3 shot blast operation shall not exceed 0.44 pounds per hour measured in accordance with Conditions 14.2 and 14.3.

9.4 The High Bay 3 shot blast fabric filter shall be equipped with the manufacturer's recommended filter failure instrumentation. The filter failure instrumentation shall be easily visible to plant personnel, shall have the manufacturer's acceptable operating range clearly indicated, and shall be checked at a minimum once during each shift while the shot blast system is in use.

10. High Bay 3 Cure, Drying Ovens and Wash Booth

10.1 The cure and drying ovens and wash booth in High Bay 3 shall operate no more than 7500 hours each, in any 12 month period monitored in accordance with Condition 15.1.

10.2 The mass emission rate of PM_{10} (=$PM_{2.5}$) in each stack exhausting the High Bay 3 Cure Ovens (3) shall not exceed 0.020 pounds per hour measured in accordance with Conditions 14.2 and 14.3.

10.3 The mass emission rate of PM_{10} (=$PM_{2.5}$) in each stack exhausting the High Bay 3 Drying Ovens (2) shall not exceed 0.019 pounds per hour measured in accordance with Conditions 14.2 and 14.3.

10.4 The mass emission rate of PM_{10} in the exhaust of the High Bay 3 Wash Booth shall not exceed 0.30 pounds per hour measured in accordance with Conditions 14.2 and 14.3.

10.5 The mass emission rate of $PM_{2.5}$ in the exhaust of the High Bay 3 Wash Booth shall not exceed 0.24 pounds per hour measured in accordance with Conditions 14.2 and 14.3.

11. High Bay 4 Shot Blast

11.1 The High Bay 4 shot blasting shall be conducted for no more than 7500 hours in any12 month period. Hours of blasting operation shall be monitored in accordance with Condition 15.1.

11.2 The mass emission rate of PM_{10} in the exhaust of the Farr Fabric Filter controlling emissions from the High Bay 4 Wheel Slung Shot Blast operation shall not exceed 0.5 pounds per hour measured in accordance with Conditions 14.2 and 14.3.

11.3 The mass emission rate of $PM_{2.5}$ in the exhaust of the Farr Fabric Filter controlling emissions from the High Bay 4 shot blast operation shall not exceed 0.44 pounds per hour measured in accordance with Conditions 14.2 and 14.3.

11.4 The High Bay 4 shot blast fabric filter shall be equipped with the manufacturer's recommended filter failure instrumentation. The filter failure instrumentation shall be easily visible to plant personnel, shall have the manufacturer's acceptable operating range clearly indicated, and shall be checked at a minimum once during each shift while the shot blast system is in use.

12. High Bay 4 Cure, Drying Ovens and Wash Booth

12.1 The cure and drying ovens and wash booth in High Bay 4 shall operate no more than 7500 hours each, in any 12 month period monitored in accordance with Condition 15.1.

12.2 The mass emission rate of PM_{10} (=$PM_{2.5}$) in each stack exhausting the High Bay 4 Cure Ovens (4) shall not exceed 0.038 pounds per hour measured in accordance with Conditions 14.2 and 14.3.

12.3 The mass emission rate of PM_{10} (=$PM_{2.5}$) in each stack exhausting the High Bay 4 Drying Ovens (2) shall not exceed 0.022 pounds per hour measured in accordance with Condition 14.2 and 14.3.

12.4 The mass emission rate of PM_{10} in the exhaust of each High Bay 4 Wash Booth shall not exceed 0.30 pounds per hour measured in accordance with Conditions 14.2 and 14.3.

12.5 The mass emission rate of $PM_{2.5}$ in the exhaust of each High Bay 4 Wash Booth shall not exceed 0.24 pounds per hour measured in accordance with Conditions 14.2 and 14.3.

13. OPERATIONS & MAINTENANCE (O&M) MANUAL

A site specific O&M manual for all equipment that has the potential to affect emissions to the atmosphere shall be developed and followed. Manufacturers' instructions may be referenced. The O&M manual shall be updated to reflect any modifications of the plant or operating procedures. The O&M manual shall at a minimum include:

13.1 Normal operating parameters for each piece of equipment described in this Approval Order.

13.2 A maintenance schedule for each piece of equipment described in this Approval Order.

13.3 Monitoring and record keeping requirements for each piece of equipment described in this Approval Order.

13.4 A description of the monitoring procedures for each piece of equipment described in this Approval Order.

13.5 Actions to be taken in the event of abnormal pollution control system operation, for each piece of equipment described in this Approval Order.

14. TESTING REQUIREMENTS

14.1 An annual particulate matter performance test is required for the following equipment:

14.1.1 The High Bay 1 Solvent Paint Booths, one of four stacks (Stack IDs 1, 2, 4, 5) selected for representative emissions, the stack selection subject to approval by Ecology.

14.1.2 The Wash Booths (High Bay 1, High Bay 3, and High Bay 4), one of four stacks (Stack IDs 10, 11, 34, 41) selected for representative emissions, the stack selection subject to approval by Ecology.

14.1.3 The Blast Booths (High Bay 1, High Bay 3, and High Bay 4), one of three stacks (Stack IDs 9, 33, 40) selected for representative emissions, the stack selection subject to approval by Ecology.

Commented [KS6]: Every 3rd year particulate matter performance test is required for the following equipment...

See attached previous performance test results.

14.2 Performance testing of equipment shall be performed at such times and frequencies specified in a condition of approval in this Order and at other times in accordance with WAC 173-400-105(4).

14.3 Performance testing shall utilize the following test methods unless an alternative method is requested by the permittee and approved by Ecology in writing:

14.3.1 Visual determination of the opacity emissions from stationary sources per Title 40 Code of Federal Regulations, Part 60, Appendix A, Method 9. (referenced as Method 9)

14.3.2 PM per Title 40 CFR 60, Appendix A, Method 5.

14.3.3 PM_{10} or $PM_{2.5}$ per 40 CFR 60, Appendix A, Method 5 with 40 CFR 51, Appendix M, Method 202 or 201A.

14.3.4 NO_x per 40 CFR 60, Appendix A, Method 7E

14.3.5 CO per 40 CFR 60, Appendix A, Method 10

14.3.6 VOC per 40 CFR 60, Appendix A, Method 25A.

14.3.7 Plant surveys for the presence of opacity from control devices shall be performed using the techniques and procedures in 40 CFR 60, Appendix A, Method 22.

14.4 Testing Logistics - The permittee shall provide testable emission points, sampling ports, safe access to sampling points and ports, and utilities for sampling and testing.

14.5 Number of Test Runs - Performance or compliance testing of each piece of pollution control equipment shall consist of three separate runs of at least 60-minutes each.

14.6 Throughput during Testing - During testing, the process shall be operated at a minimum of ninety percent (90%) of rated capacity for equipment with less than 12 months operating history, or 90 to 110% of the maximum process rate recorded during the preceding 12 month period for equipment operated for 12 months or more. Operation of the process during testing outside of the specified range may be proposed, but may result in an operational restriction added to this Approval Order.

14.7 Submittal of Performance Test Plan - A written test protocol that includes a description of the equipment to be tested, the process and control device operating information to be collected during the test, and the sampling and analytical method(s) proposed, shall be submitted to Ecology at least 30 calendar days prior to the start of any performance test.

14.8 Notification of Inability to Conduct Performance Test - If the permittee is unable to conduct any performance test as scheduled, Ecology shall be notified at least 24-hours before the test at the address under "Submittals", Condition 18, or via telephone at 509-329-3400.

14.9 Plant Operator during Testing - The plant process equipment shall be operated and controlled by normal plant operators during the period when the performance testers are on-site to conduct testing and during actual testing.

14.10 Performance or Compliance Testing Results - The results of all initial performance testing and all other periodic performance testing shall be sent to the address at Approval Condition 18. One copy of the completed test report shall be submitted no later than 60-days after the last day of the testing.

15. MONITORING AND RECORDKEEPING

Specific records shall be kept on-site by the permittee and made available for inspection by Ecology upon request. The records shall be organized in a readily accessible manner and cover a minimum of the most recent 60-month period. The records to be kept shall include the following:

15.1 MONITORING

Monitoring of the hours of operation of equipment, where the operation is limited to reduce annual emissions, shall be performed using hours meters and totalizing strip charts. A facility monitoring plan may be submitted for Ecology review to streamline monitoring. The monitoring plan may be incorporated into the facility operations and maintenance (O&M) plan.

15.2 RECORDKEEPING

Specific records shall be kept on-site by the permittee and made available for inspection by Ecology upon request. The records shall be organized in a readily accessible manner and cover a minimum of the most recent 60-month period. The records to be kept shall include the following:

15.2.1 Natural gas fuel consumption for the equipment described in this Approval Order shall be recorded for each calendar year. This recordkeeping shall be done via fuel bills or gas meter readings.

15.2.2 Consumption records and MSD (or manufacturer's environmental data sheets (EDS)) sheets for each coating and solvent used during a calendar month. The MSDS, EDS data sheets (or comparable data sheets) shall clearly identify the precise weight percent (to the nearest 0.1%) of all components for each paint and solvent used. Terex shall calculate monthly emissions based on measured paint and solvent usage or paint and solvent purchases and may subtract VOCs and TAPs that are shipped off-site in waste or unused products.

15.2.3 A record of the type of filter media (and PM capture efficiency for all filters on exhausts to building exteriors) used with each paint booth and powder coating booth during a calendar year.

15.2.4 Occurrence and duration of any malfunction in the operation of the abrasive blasting booth baghouses. The record shall include date, time, duration and/or cause, as applicable.

15.2.5 Baghouse bag failure records, which show the location of failed bags in relation to bag configuration, and date of replacement shall be maintained.

15.2.6 A file of any periodic performance testing results.

15.2.7 O&M manual and maintenance records.

15.2.8 Monthly Updates to the coatings and solvents emission accounting system. The accounting system may identify and subtract the waste stream characterized as approved by Ecology. The accounting system currently consists of a spreadsheet identifying each coating sprayed, composition of each coating and solvent, and quantity of each coating sprayed and solvent consumed. The waste solids and solvent stream to be subtracted from the emissions is characterized by estimating the solids fraction of each drum of waste, and assuming the solvent fraction is a weighted average of the solvents used in the coatings.

15.2.9 Nature and details of any emergency or upset condition to include the date/time, duration, cause, and remedial action.

15.2.10 Rolling 12 month Quantity of Welding Electrode consumed at the facility.

15.2.11 No less than monthly, the facility-wide emission accounting of VOC and HAPs and TAPs shall be updated. All emission estimates shall be prepared using Ecology-approved emission factors. Total facility-wide VOC and HAP and TAP emissions shall be calculated as the sum of coatings and solvent emissions, natural gas combustion emissions, powder coating emissions.

16. ANNUAL REPORTING

An annual report shall be sent to Ecology, within 30 days following the end of the calendar year. The annual report shall summarize the annual data and contain the following:

16.1 The annual quantity of natural gas consumed by all gas-fired equipment at the facility.

16.2 An annual summary of PM, VOC and HAP/TAP emissions from all coating activities, and from all other activities with emissions of those pollutants, estimated using the Ecology-approved emission factors or estimating procedures.

16.3 An annual summary of the preceding rolling 12 month welding electrode consumption, and associated emission estimates, estimated using Ecology-approved emission factors or estimating procedures.

16.4 A certification by a responsible official of the permittee's organization of the accuracy, truthfulness, and completeness of the annual report.

17. ON-GOING REPORTING

17.1 A written description of the **occurrence and duration of any malfunction** per the recordkeeping at Approval Condition 15.2.4 shall be sent to the address in Approval Condition 18 no later than 30-days following the discovery of such an event.

18. SUBMITTALS

All notifications, reports, and other submittals shall be sent to:
Washington State Department of Ecology
Regional Air Quality Section
4601 N. Monroe
Spokane, WA 99205-1295

19. GENERAL CONDITIONS

19.1 Visible Emissions - No visible emissions shall be allowed beyond the property line, as determined by opacity readings.

19.2 Commencing/Discontinuing Construction and/or Operations - This Approval Order shall become void if construction is not commenced within eighteen (18) months following the date of this Approval Order, or if construction and/or operation is discontinued for a period of eighteen (18) months.

19.3 Compliance Assurance Access - Access to the source by EPA or Ecology shall be allowed for the purposes of compliance assurance inspections. Failure to allow access is grounds for revocation of this Approval Order and enforcement under applicable regulations.

19.4 Availability of this Approval Order - Legible copies of the Order approving the NOC application shall be available to employees in direct operation of the facility and be available for review upon request by Ecology.

19.5 Equipment Operation - Operation of the facility shall be conducted in compliance with all data and specifications submitted as part of the NOC application and in accordance with the O&M manual.

19.6 Activities Inconsistent with this Approval Order - Any activity undertaken by the permittee or others, in a manner that is inconsistent with information in the NOC

ADDRESS AND LOCATION INFORMATION

Street Addresses	Mailing Addresses
Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503 **Pollution Control Hearings Board** 1111 Israel RD SW STE 301 Tumwater, WA 98501	**Department of Ecology** Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608 **Pollution Control Hearings Board** PO Box 40903 Olympia, WA 98504-0903

For additional information visit the Environmental Hearings Office
Website: http://www.eho.wa.gov
To find laws and agency rules visit the Washington State Legislature Website:
http://www1.leg.wa.gov/CodeReviser

DATED at Spokane, Washington this 14th day of June, 2016.

PREPARED BY:

Jenny M. Filipy
Regional Air Quality Section
Department of Ecology
State of Washington

REVIEWED BY:

Robert W. Koster, P.E.
Regional Air Quality Section
Department of Ecology
State of Washington

APPROVED BY:

Karen K. Wood, Section Manager
Regional Air Quality Section
Department of Ecology
State of Washington