



October 25, 2023

Ms. Jenny Filipy
Air Quality Program
Washington State Department of Ecology
4601 North Monroe
Spokane, WA 99205-1295

Subject: SGL Carbon request for permit modification to use full silicon coated precursor on any production line instead of Line 5 only.

Dear Ms. Filipy:

SGL Carbon operates under Washington Department of Ecology (Ecology) Approval Order #21AQ-E026 dated May 9, 2023. Pursuant to Approval Condition I.e. Facility-Wide Requirements, only Line 5 is permitted to operate with a pure silicon finish on raw acrylonitrile material.

SGL has conducted several trial runs of full silicon coated precursor at lines 2 and 3, with permission from Ecology, in order to “tune” the lines’ ability to produce the higher quality product that is possible using full silicon coated precursor. The push for this process change is the current demand for higher tensile strength carbon fiber used in the pressure vessel and aerospace industries. There are no process changes or emissions increases to produce this material; only line speeds and fine oven temperature adjustments. It would be beneficial for SGL to be able to produce this product at either Lines 1 or 2 so that Line 5 may be shut down, thus closing Production Building 3.

At this time, SGL would like to respectfully ask Ecology to approve SGL Carbon to run full silicon coated precursor on any production line instead of Line 5 only. SGL will run only one line at a time using this material and will track the usage on each line. This change will allow SGL to continuously produce the high tensile strength product that is required by SGL clients.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregory Pincelli". The signature is fluid and cursive, with a large loop at the end.

Gregory Pincelli, PE
Environmental Engineer



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
P.O. Box 47611
Olympia, WA 98504-7611**

For Fiscal Office Use Only:
001-NSR-216-0299-000404

Check the box for the location of your proposal. For assistance, call the contact listed below:		
	Ecology Permitting Office	Contact
<input type="checkbox"/>	Chelan, Douglas, Kittitas, Klickitat, or Okanogan County Ecology Central Regional Office – Air Quality Program CRO	Lynnette Haller (509) 457-7126 lynnette.haller@ecy.wa.gov
<input checked="" type="checkbox"/>	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Stevens, Walla Walla or Whitman County Ecology Eastern Regional Office – Air Quality Program ERO	Karin Baldwin (509) 329-3452 karin.baldwin@ecy.wa.gov
<input type="checkbox"/>	San Juan County Ecology Northwest Regional Office – Air Quality Program NWRO	David Adler (425) 649-7267 david.adler@ecy.wa.gov
<input type="checkbox"/>	For actions taken at Kraft and Sulfite Paper Mills and Aluminum Smelters Ecology Industrial Section – Waste 2 Resources Program Permit manager: _____ IND	James DeMay (360) 407-6868 james.demay@ecy.wa.gov
<input type="checkbox"/>	For actions taken on the US Department of Energy Hanford Reservation Ecology Nuclear Waste Program NWP	Lilyann Murphy (509) 372-7951 lilyann.murphy@ecy.wa.gov

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



Notice of Construction Application

New project or equipment:

<input type="checkbox"/>	\$1,500: Basic project initial fee covers up to 16 hours of review.
<input type="checkbox"/>	\$10,000: Complex project initial fee covers up to 106 hours of review.

Change to an existing permit or equipment:

<input type="checkbox"/>	\$200: Administrative or simple change initial fee covers up to 3 hours of review Ecology may determine your change is complex during completeness review of your application. If your project is complex, you must pay the additional \$675 before we will continue working on your application.
<input checked="" type="checkbox"/>	\$875: Complex change initial fee covers up to 10 hours of review
<input type="checkbox"/>	\$350 flat 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, then check the box next to it to acknowledge that you agree.	
<input checked="" type="checkbox"/>	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 \$95 per hour for the extra time.
<input checked="" type="checkbox"/>	You must include all information requested by this application. Ecology may not process your application if it does not include all the information requested.
<input checked="" type="checkbox"/>	Submittal of this application allows Ecology staff to visit and inspect your facility.



Notice of Construction Application

Part 1: General Information

I. Project, Facility, and Company Information

1. Project Name Full Silicon Coated Precursor Use to Any Production Line
2. Facility Name SGL Composites LLC
3. Facility Street Address 8781 Randolph Road NE, Moses Lake, WA 98837
4. Facility Legal Description Township 20N, Range 28E, Section 22
5. Company Legal Name (if different from Facility Name)
6. Company Mailing Address (street, city, state, zip) 8781 Randolph Road NE, Moses Lake, WA 98837

II. Contact Information and Certification

1. Facility Contact Name (who will be onsite) Gregory Pincelli	
2. Facility Contact Mailing Address (if different than Company Mailing Address)	
3. Facility Contact Phone Number 863-640-1736	4. Facility Contact E-mail Greg.pincelli@sglcarbon.com
5. Billing Contact Name (who should receive billing information) Gregory Pincelli	
6. Billing Contact Mailing Address (if different than Company Mailing Address)	
7. Billing Contact Phone Number 863-640-1736	8. Billing Contact E-mail Greg.pincelli@sglcarbon.com
9. Consultant Name (optional – if 3 rd 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) Lee McKinley, Plant Manager	
16. Responsible Official Phone 509-855-6940	17. Responsible Official E-mail Lee.mckinley@sglcarbon.com
18. Responsible Official Certification and Signature I certify that the information on this application is accurate and complete.	
Signature	Date 10/24/2023

Part 2: Technical Information



Notice of Construction Application

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

Please attach the following to your application.

- Written narrative describing your proposed project.
- Projected construction start and completion dates.
- Operating schedule and production rates.
- List of all major process equipment with 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 & 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, 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>



Notice of Construction Application

V. Emissions Estimations of Criteria Pollutants

Does your project generate criteria air pollutant emissions? Yes No

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

The names of the criteria air pollutants emitted (i.e., NO_x, SO₂, CO, PM_{2.5}, PM₁₀, 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

If yes, please provide the following information regarding your toxic air pollutant emissions in your application.

The names of the toxic air pollutants emitted (specified in WAC 173-460-150¹)

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 70.94 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.

¹ <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-460-150>



Notice of Construction Application

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