

Michael O. Leavitt Governor Dianne R. Nielson, Ph.D. Executive Director Russell A. Roberts Director

State of Utah

DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF AIR QUALITY

150 North 1950 West P.O. Box 144820 Salt Lake City, Utah 84114-4820 (801) 536-4000 (801) 536-4099 Fax (801) 536-4414 T.D.D.

DAQE-433-94

May 27, 1994

Fred Fox Kennecott, Utah Copper P.O. Box 525 Bingham Canyon, Utah 84006-0525

Re: Approval Order For RACT Analysis Salt Lake County CDS A1 NA Title V Major

Dear Mr. Fox:

The attached document is an Approval Order for the above referenced project.

Future correspondence on this Approval Order should include the engineer's name as well as the DAQE number as shown on the upper right hand corner of this letter. Please direct any technical questions you may have on this project to Mr. Tim Blanchard. He may be reached at (801) 536-4057.

Sincerely,

Russell A. Roberts, Executive Secretary Utah Air Quality Board

RAR:JTB:dn

Vol 1 1.2.0-11

DAQE-433-94 Page 2 May 26, 1994

Abstract

Kennecott Utah Copper (KUC) submitted a Notice of Intent dated February 25, 1994, in order to comply with the NO_x Reasonably Available Control Technology (RACT) requirement of Utah State Implementation Plant (SIP) Section IX.D.2.g as it applies to KUC's Utah Power Plant (UPP). KUC proposes to install low-NO_x burners in one of the three older boilers (Boiler #1, #2, or #3) at the UPP, and test the performance of the boiler with the low-NO_x burners. If that boiler performs satisfactorily in terms of both operation and NO_x and NO_x emission reduction, then KUC will install identical low-NO_x burners in the other two boilers. If the first boiler does not perform satisfactorily, then RACT for these three boilers will need to be reevaluated. No other changes are proposed.

The NO_x emissions shall be reduced by 1,324 tons/year by May 31, 1995, if the low-NO_x burners operate as the manufacturer guaranteed.

The above-referenced project has been evaluated and found to be consistent with the requirements of the Utah Air Conservation Rules (UACR) and the Utah Air Conservation Act. A 30-day public comment period was held and all comments received were evaluated. The conditions of this Approval Order (AO) reflect any changes to the proposed conditions which resulted from the evaluation of the comments received. This air quality AO authorizes the project with the following conditions, and failure to comply with any of the conditions may constitute a violation of this order.

General Conditions

1. This AO applies to the following plant:

Operation Offices

Kennecott Utah Copper Corporation P. O. Box 525 Bingham Canyon, Utah 84006-0525

Facility Street Address

Kennecott Utah Power Plant 9600 West 2100 South Magna, Utah 84044

Facility Approximate Universal Transverse Mercator (UTM) Coordinate System Coordinates

405,000 meters East, 4,507,000 meters North

2. Definitions of terms, abbreviations, and references used in this AO conform to those used in the UACR, Utah Administrative Codes (UAC), and Series 40 of the Code of

DAQE-433-94 Page 3 May 26, 1994

Federal Regulations (40 CFR). These definitions take precedence unless specifically defined otherwise herein.

3. Kennecott Utah Copper Corporation (KUC) shall install six new low-NO, burners in either Boiler #1, Boiler #2, or Boiler #3, according to the information submitted in the Notice of Intent dated February 25, 1994. If initial testing demonstrates that the boiler operates as guaranteed by the manufacturer of the burners, both in terms of operation and emissions, then KUC shall install six new low-NO, burners in each of the other two boilers and operate all three boilers (#1, #2, and #3) according to the information submitted in the Notice of Intent dated February 25, 1994.

4. As provided by R307-1-3.2.4, UAC, this AO shall take precedence in the event of any inconsistency between conditions of this AO and Section IX, Part H.2.a and Section IX, Part H.2.b.Z of the SIP for Salt Lake and Davis Counties.

5. A copy of this AO shall be posted on site. This AO shall be available to the employees who operate the air emission producing equipment. These employees shall receive instruction as to their responsibilities in operating the equipment according to all of the relevant conditions listed below.

6. The approved installations shall consist of only the following emissions points:

A. Boilers No. 1, No. 2, and No. 3, each rated at:

431.4 MMBtu/hr maximum heat input when burning coal 453 MMBtu/hr maximum heat input when burning natural gas

B. Boiler No. 4, rated at:

838 MMBtu/hr maximum heat input when burning coal 872 MMBtu/hr maximum heat input when burning natural gas

C. Other associated equipment, such as coal and ash handling equipment, and maintenance equipment.

Limitations and Test Procedures.

- 7. During the period from November 1, to the last day in February, inclusive, the following conditions shall apply:
 - A. The four boilers shall use only natural gas as a fuel, unless the supplier or transporter of natural gas imposes a curtailment. The power plant may then burn coal, only for the duration of the curtailment plus sufficient time to empty the coal bins following the curtailment. The Executive Secretary shall

Vol 1 1.2.0-13

DAQE-433-94 Page 4 May 26, 1994

be notified of the curtailment within 48 hours of when it begins and within 48 hours of when it ends.

B. The following limits on fuel usage shall not be exceeded without prior approval in accordance with Section R307-1-3.1:

1) 40 million cubic feet per day of natural gas

2) 1370 tons per day of coal, only during curtailment of natural gas supply

C. Natural gas used as fuel:

a) ·

Except during a curtailment of natural gas supply, emissions to the atmosphere from the indicated emission point shall not exceed the following rates and concentrations:

1) For each of boilers no. 1, 2, & 3:

 $PM_{10} = 0.004 \text{ grain/dscf} (68^{\circ}F, 29.92 \text{ in Hg})$

b) NO_x - 159 lb/hr 336 ppmdv (measured at 3% oxygen)

2) For boiler no. 4:

a) $PM_{10} - 0.004 \text{ grain/dscf} (68^{\circ}F, 29.92 \text{ in Hg})$

b) NO_x - 306 lb/hr 336 ppmdv (measured at 3% oxygen)

D. Coal used as fuel:

During a curtailment of natural gas supply, emissions to the atmosphere from the indicated emission point shall not exceed the following rates and concentrations:

1) For each of boilers no. 1, 2, & 3:

a) PM₁₀ - 17.3 lb/hr - 0.029 grain/dscf (68°F, 29.92 in Hg) DAQE-433-94 Page 5 May 26, 1994

b) On or before May 31, 1995

NO_x - 278 lb/hr

- 597 ppmdv (measured at 3% oxygen)

After May 31, 1995, if the low-NO_x burners operate in the initial trial as guaranteed by the manufacturer,

NO_x - 216 lb/hr

- 426.5 ppmdv (measured at 3% oxygen)

If the low-NO_x burners fail the initial trial, then the post-May 31, 1995, NO_x limit for Boilers #1, #2, and #3 must be reevaluated and revised by a subsequent AO.

For boiler no. 4:

a)

2)

PM10 - 33.5 lb/hr

- 0.029 grain/dscf (68°F, 29.92 in Hg)

b) On or before May 31, 1995

NO_x - 637 lb/hr - 597 ppmdv (measured at 3% oxygen)

After May 31, 1995

NO_x - 377 lb/hr - 384 ppmdv (measured at 3% oxygen)

- E. Owner/operator shall provide monthly reports to the Executive Secretary showing daily total emission estimates based upon boiler usage, fuel consumption and previously available results of stack tests.
- 8. During each annual period from March 1 to October 31, inclusive, the following conditions shall apply:

A. The owner/operator shall use coal, natural gas, oils that meet all the specifications of 40 CFR 266.40(e) and contains less than 1000 ppm total halogens, and/or number two fuel oil or lighter in the boilers.

B. The following limit on fuel usage shall not be exceeded without prior approval in accordance with Subsection R307-1-3.1, UAC:

50,400 million Btu per day of heat input

Vol 1 1.2.0-15

DAQE-433-94 Page 6 May 26, 1994

. **C.**

Emissions to the atmosphere from each emission point shall not exceed the following rates and concentrations:

1) For each of boilers no. 1, 2, & 3:

a) PM₁₀ - 17.3 lb/hr - 0.029 grain/dscf (68°F, 29.92 in Hg)

b).1 On or before May 31, 1995

NO_x - 562 lb/hr - 1208 ppmdv (measured at 3% oxygen)

.2 After May 31, 1995, if the low-NO_x burners operate in the initial trial as guaranteed by the manufacturer

NO_x - 216 lb/hr - 426.5 ppmdv (measured at 3% oxygen)

If the low-NO_x burners fail the initial trial, then the post-May 31, 1995, NO_x limit for Boilers #1, #2, and #3 must be reevaluated and revised by a subsequent AO.

For boiler no. 4:

2)

a) PM₁₀ - 33.5 lb/hr - 0.029 grain/dscf (68°F, 29.92 in Hg)

b).1 On or before May 31, 1995

NO_x - 796 lb/hr - 746 ppmdv (measured at 3% oxygen)

.2 After May 31, 1995

NO_x - 377 lb/hr - 384 ppmdv (measured at 3% oxygen)

9. Stack testing to show compliance with the above emission limitations shall be performed for all four boilers and the following air contaminants, as determined by the following test methods in accordance with 40 CFR 60, Appendix A, 40 CFR 51. Appendix M (see Section IX, Part H.2.a for more details), and as directed by the Executive Secretary:

DAQE-433-94 Page 7 May 26, 1994

		Method	Retest every
A. -	NO	7	1 year
B.	PM ₁₀	201/201a	1 year

The heat input during all compliance testing shall be no less than 90% of the design rate, which is 388 MMBTU/hr for boilers 1, 2, and 3, and 754 MMBTU/hr for boiler #4.

Notification

The applicant shall provide a notification of the test date at least 45 days prior to the test. A pretest conference shall be held if directed by the Executive Secretary. It shall be held at least 30 days prior to the test between the owner/operator, the tester, and the Executive Secretary. The emission point shall be designed to conform to the requirements of 40 CFR 60, Appendix A, Method 1, and Occupational Safety and Health Administration (OSHA) or Mine Safety and Health Administration (MSHA) approvable access shall be provided to the test location.

PM₁₀

For stacks in which no liquid drops are present, the following methods shall be used: 40 CFR 51, Appendix M, Methods 201 or 201a. The back half condensibles shall also be tested using the method specified by the Executive Secretary. The back half condensibles shall not be used for compliance demonstration but shall be used for inventory purposes.

Sample Location

40 CFR 60, Appendix A, Method 1, if required by test method used.

Volumetric Flow Rate

40 CFR 60, Appendix A, Method 2, if required by test method used.

Nitrogen Oxides

40 CFR 60, Appendix A, Method 7, 7A, 7B, 7C, 7D, or 7E

DAQE-433-94 Page 8 May 26, 1994

<u>Calculations</u>

To determine mass emission rates (lb/hr) the pollutant concentration as determined by the appropriate methods above shall be multiplied by the volumetric flow rate and any necessary conversion factors determined by the Executive Secretary to give the results in the specified units of the emission limitation.

10. A. Visible emissions from the boiler stacks shall not exceed the associated opacity on a six-minute average, based on 40 CFR 60, Appendix A, Method 9, or as measured by a CEM, except as provided for in R307-1-4.1.7:

Natural Gas Fuel	10% opacity
Coal Fuel	20% opacity

B. Visible emissions from the following types of stationary sources shall not exceed the associated opacity on a six minute average, based on 40 CFR 60, Appendix A, Method 9:

Baghouses	
Fugitive Emissions	
Fugitive Dust	

10% opacity 15% opacity 20% opacity

Fuels

- 11. The sulfur content of any fuel burned shall not exceed 0.52 lb of sulfur per million Btu (annual running average), nor shall any one test exceed 0.66 lb of sulfur per million Btu.
 - A. Coal increments will be collected using ASTM 2234, Type I conditions A, B, or C and systematic spacing.

Fuel lot size is defined as the weight of fuel consumed during three operational hours.

B. Percent sulfur content and gross calorific value of the coal on a dry basis will be determined for each gross sample using ASTM D methods 2013, 3177, 3173, and 2015.

C. Failure of the owner/operator to measure at least 95% of the required increments in any one month shall constitute a violation of this provision.

D. The owner/operator shall submit monthly reports of sulfur input to the boilers. The reports shall include sulfur content, gross calorific value and moisture content of each gross coal sample; the gross calorific value of all coal and DAQE-433-94 Page 9 May 26, 1994

gas; the total amount of coal and gas burned; and the running annual average sulfur input calculated at the end of each month of operation.

Conditions 11.A, 11.B, and 11.C may be replaced by an alternative testing plan for use with a given source of coal in accordance with R307-1-4.2.1.E, UAC.

12. Natural gas consumption shall be determined by metering the gas as it is fed into the boilers with gauges, which shall be installed if necessary. Records shall be kept on a daily basis. Coal consumption shall be determined by examination of purchase records and electricity production records. Records of fuel consumption shall be made available to the Executive Secretary upon request, and shall include a period of two years ending with the date of the request.

Records & Miscellaneous

- 13. All installations and facilities authorized by this AO shall be adequately and properly maintained. All pollution control vendor recommended equipment shall be installed, maintained, and operated. Instructions from the vendor or established maintenance practices that maximize pollution control shall be used. All necessary equipment control and operating devices, such as pressure gauges, amp meters, volt meters, flow rate indicators, temperature gauges, CEMs, etc., shall be installed and operated properly and easily accessible to compliance inspectors. A copy of all manufacturers' operating instruction for pollution control equipment and pollution emitting equipment shall be kept on site. These instructions shall be available to all employees who operate the equipment and shall be made available to compliance inspectors upon their request.
- 14. The owner/operator shall comply with R307-1-3.5, UAC. This rule addresses emission inventory reporting requirements.
- 15. The owner/operator shall comply with R307-1-4.7, UAC. This rule addresses unavoidable breakdown reporting requirements. The owner/operator shall calculate/estimate the excess emissions whenever a breakdown occurs. The total of excess emissions shall be reported to the Executive Secretary as directed for each calendar year.

Any future modifications to the equipment approved by this order must also be approved in accordance with R307-1-3.1.1, UAC.

This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including the UACR.

Annual emissions for this source (the entire power plant) are currently calculated at the following values:

Vol 1 1.2.e-19

<u>Pollutant</u>

Emissions

PM₁₀

257 tons/yr

DAQE-433-94 Page 10 May 26, 1994

> SO₂ NO_x NO_x

6219 tons/yr 5085 tons/yr, on or before May 31, 1995 3761 tons/yr, after May 31, 1995, if the low NO_x burners operate in the initial trial as guaranteed by the manufacturer.

These calculations are for the purposes of determining the applicability of Prevention of Significant Deterioration and nonattainment area major source requirements of the UACR. They are not to be used for the purposes of determining compliance.

If the low-NO_x burners fail the initial trial, or if, for any reason, KUC is unable to comply with the NO_x emission levels referred to in this AO, after May 31, 1995, then the State must make the appropriate revisions to the Ozone SIP in accordance with the rulemaking process, including a redefinition of NO_x RACT for the power plant, and the NO_x emission limits for the power plant shall be recalculated and revised by the issuance of a subsequent AO.

Approved By.

Russell A. Roberts, Executive Secretary Utah Air Quality Board



Michael O. Leavitt Governor Dianne R. Nielson, Ph.D. Executive Director Russell A. Roberts Director State of Utah DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF AIR QUALITY

150 North 1950 West P.O. Box 144820 Salt Lake City, Utah 84114-4820 (801) 536-4000 (801) 536-4099 Fax (801) 538-4414 T.D.D.

DAQE-300-95

April 13, 1995

Dwayne Hirst Olympia Sales Company 1537 South 700 West Salt Lake City, Utah 84104

Re: Approval Order Revised To Meet The Ozone Maintenance Plan Salt Lake County - CDS A1 NA - Toxic Major Title V Major

Dear Mr. Hirst:

The attached document is an Approval Order for the above referenced project.

Future correspondence on this Approval Order should include the engineer's name as well as the DAQE number as shown on the upper right-hand corner of this letter. Please direct any technical questions you may have on this project to Mr. Jon Black. He may be reached at (801) 536-4047.

Sincerely,

Russell A. Roberts, Executive Secretary Utah Air Quality Board

RAR:JB:aj

cc: Salt Lake City/County Health Department EPA Region VIII, Mike Owens

4.2.5-2



STATE OF UTAH

Department of Environmental Quality

Division of Air Quality

APPROVAL ORDER REVISED TO MEET THE OZONE MAINTENANCE PLAN

PREPARED BY: JON BLACK, ENGINEERING TECHNICIAN

REVIEWED BY: TIM BLANCHARD, ENGINEER

APPROVAL NUMBER DAQE-300-95

Date: April 13, 1995

Source

OLYMPIA SALES COMPANY

Russell A. Roberts Executive Secretary Utah Air Quality Board

Abstract

Olympia Sales Company manufactures kitchen cabinets. They are located at 1537 South 700 West, Salt Lake City, Utah, which is a Nonattainment area for PM₁₀, SO₂, CO and Ozone. Olympia Sales possess a current Approval Order (AO) DAQE-0167-94 for its facility. The cabinet manufacturing facility is a major source of VOC emission, and will be required to meet Reasonable Available Control Technology (RACT). RACT will be imposed in order to comply with the requirements of the Ozone Maintenance Plan. RACT will require that all of the painting processes be equipped with High Volume Low Pressure (HVLP) paint guns. Olympia's conventional paint guns will all be replaced by the HVLP guns by November 15, 1995. Olympia will also be required to implement a maintenance and inspection plan which will record dates and times of inspections and repairs to the painting processes. The new employees will be required to go through a training period where an experienced painter is with the new painter at all times when spraying. The new employee shall not use the paint spraying equipment without supervision until they have shown that they are experienced and competent in performing the painting tasks which are required of them. Olympia has recently experimented with low VOC water based paints, and has found that problems of excessive drying time and below standard finish quality exist from use of these products. Olympia is continuing to research the new low VOC products on the market, but will not be required to use these products at this time. The emissions of concern from this facility will remain at 129 tons/yr of VOC, 32.8 tons/yr of Particulate and 28.4 tons/yr of PM₁₀. These emission totals have been modeled for the previous permit mentioned above. Therefore, further modeling will not be required. Because Olympia Sales is a major toxic source, a Title V permit will be required.

This project has been evaluated and found to be consistent with the requirements of the Utah Air Conservation Rules (UACR) and the Utah Air Conservation Act. A 30-day public comment period was held and all comments received were evaluated. The conditions of this AO reflect any changes to the proposed conditions which resulted from the evaluation of the comments received. This air quality AO authorizes the project with the following conditions, and failure to comply with any of the conditions may constitute a violation of this order.

General Conditions:

1. This AO applies to the following company:

Olympia Cabinet Manufacturing and Sales Company 1537 South 700 West Salt Lake City, Utah 84104 (801) 972-4050

The equipment listed below in this AO shall be operated at the following location:

PLANT LOCATION:

Olympia Cabinet Manufacturing and Sales Company 1537 South 700 West Salt Lake City, Utah 84104

Universal Transverse Mercator (UTM) Coordinate System: 4,509,700 meters Northing, 422,900 meters Easting

2. Definitions of terms, abbreviations, and references used in this AO conform to those used in the UACR, Utah Administrative Codes (UAC), and Series 40 of the Code of Federal Regulations (40 CFR). These definitions take precedence unless specifically defined otherwise herein.

3. Olympia Cabinet Manufacturing and Sales Company shall operate the cabinet manufacturing facility according to the information submitted in the Notice of Intent dated January 5, 1995, and additional information submitted to the Executive Secretary dated February 24, 1995.

- 4. A copy of this AO shall be posted on site. The AO shall be available to the employees who operate the air emission producing equipment. These employees shall receive instruction, per condition #16 of this AO, as to their responsibilities in operating the equipment according to all of the relevant conditions listed below.
- 5. The approved installations shall consist of the following equipment:
 - A. Five (5) Binks spray booths equipped with Andreae filters
 - B. Three (3) cyclone dust collectors
 - #1 Mill Area operating at approximately 12,000 cfm
 - #2 Door Area operating at approximately 14,000 cfm
 - #3 Sanding Area operating at approximately 25,000 cfm

Limitations and Tests Procedures

- 6. Visible emissions from the #3 cyclone dust collector shall not exceed 10% opacity. Visible Emissions from any other point or fugitive emission source associated with the installation or control facilities shall not exceed 20% opacity. Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9.
- 7. The following operation limits shall not be exceeded without prior approval in accordance with R307-1-3.1, UAC:
 - A. 16 hours per day
 - B. 4160 hours per 12-month period

Compliance with the annual limitations shall be determined on a rolling 12-month total. Based on the first day of each month, a new 12-month total shall be calculated using data from the previous 12 months.

> Records of operation shall be kept for all periods when the plant is in operation. Records of operation shall be made available to the Executive Secretary or his representative upon request, and shall include a period of two years ending with the date of the request. The records shall be kept on a daily basis. Hours of operation shall be determined by supervisor monitoring and maintaining of an operations log.

Volatile Organic Compounds (VOC) Limitations.

- 8. Each paint spray booth shall be equipped with a set of paint arrestor particulate filters to control particulate emissions or equivalent. All air exiting the booth shall pass through a control system before being vented to the atmosphere. Equivalency shall be determined by the Executive Secretary.
- 9. Full paint and solvent barrels shall be kept in a proper storage room. The barrels shall have sealed lids until they are ready to be used in the painting operation. Once a paint barrel becomes empty it shall be removed from the painting process and re-sealed with a lid. The empty barrels shall be placed in a storage area to await pickup.
- 10. The plantwide emissions of VOC and HAPS from the lacquer spray booths, solvent cleaning and associated surface coating operations shall not exceed:

129.0 tons per rolling 12-month period for VOC 104.6 tons per rolling 12-month period for HAPs

This value shall not be exceeded without prior approval in accordance with R307-1-3.1, UAC. Compliance with the limitation shall be determined on a rolling 12-month total. Based on the first day of each month a new 12-month total shall be calculated using data from the previous 12 months.

The plant-wide emissions of VOCs and HAPs shall be determined by maintaining a record of VOC and HAPs potential contained in materials used each month. The record shall include the following data for each item used:

- A. List name of the VOC and HAPs emitting material, such as; paint, adhesive, solvent, thinner, reducers, chemical compounds, toxics, isocyanates, etc.
- B. List the weight and use location of the VOC and HAPs potential (name of paint booth or plant facility) in the material in pounds per gallon.
- C. List the percent by weight of all potential VOCs and HAPs each individual material listed in A. The recommended source of the information is from the manufacturer's MSDS¹ The owner/operator shall obtain MSDS data from manufacturer and retain information on-site.

 $^{1}MSDS = Material Safety Data Sheets.$

- D. List the amount and location of materials listed in A that are used on a daily basis and summed for every location and for the entire plant each month.
- E. To calculate the amount of VOCs and HAPs potential contained in the material listed in D use the following procedure:

VOC or HAPs = $(\% \text{ Volatile by Weight}) \times (Density lb) \times (Gal Consumed) \times (1 \text{ ton})$ (100) (gal) (2,000 lb)

- F. The amount of VOCs and HAPs potential contained in materials disposed of as solid or hazardous waste for the month shall be quantified and subtracted from the quantities calculated above, to provide the monthly total VOC and HAPs emissions put into the air. (It is assumed that all VOC and HAPs potential in material that are applied to a product evaporate and are considered emissions.
- G. Records of consumption and emissions shall be kept for all periods when the plant is in operation. Records of consumption shall be made available to the Executive Secretary upon request, and shall include a period of two years ending with the date of the request.
- 11. The owner/operator of this installation shall use best working practices to reduce coating and solvent emissions. This includes the following control measures:
 - A. Conversion of lacquers and other surface coatings to water-based compounds as practicable The Executive Secretary shall be informed of the progress made in this area. The owner/operator shall submit a written report to the Executive Secretary each year by January 31.
 - B. Minimizing solvent usage The Executive Secretary shall be informed of the progress made in this area. The owner/operator shall submit a written report to the Executive Secretary each year by January 31.
 - C. Storing volatile raw materials in tightly sealed containers.
- 12. All HAPs are subject to the annual Operating Permit Program if one of the following conditions is met:
 - A. The emissions of any one of the 189 HAPs listed in the 1990 Clean Air Act is over ten tons/yr.
 - B. The emissions of any combination of these HAPs are over 25 tons/yr.
- 13. This source is required to pay an annual emission fee upon start-up [or if an existing facility, upon issuance of this AO. The fee will be based on calculated annual emissions listed at the end of this AO. This fee is valid until inventory data for one year are available for the source.

The owner or operator of this source will be billed upon start-up for all emissions that are considered "chargeable" as of that date.

14. Olympia Cabinet Manufacturing and Sales Company shall use HVLP spray guns for all of their painting processes. These guns shall all be installed and be used by November 15, 1995.

Records & Miscellaneous

- 15. An Inspection and Maintenance Plan shall be used in the painting operation. This plan shall require that one time each month all pumps, piping, hoses and spray guns of each painting process shall be visually inspected for leakage. A chart shall be posted on the pump room wall of Olympia Cabinet Manufacturing and Sales Company which shall note the inspectors name, the date of the inspection, and the result of the inspection. The chart shall also record all maintenance of the pumps, piping, hoses and spray guns which takes place and the associated date. The plan shall be made available to the Executive Secretary or his representative upon request.
- 16. New employees shall be required to go through a training period where an experienced painter is present with the new painter at all times when spraying. The new employee shall be instructed in spraying techniques to give the best possible finish without wasting paint. They shall also be properly trained in inspection techniques which are addressed in the Inspection and Maintenance Plan. New employees shall not use the paint spraying equipment without supervision until they have shown that they are experienced and competent in performing the painting tasks required of them.
- 17. Records referenced in condition #7, condition #10 and condition #15 of this AO shall be made available to the Executive Secretary or his representative upon request. The records referenced shall consist of the following:

<u>Condition #7</u>: (Operating hours)

Operating hours per day

Condition #10 :

Α.

- A. Name and type of VOC emitting material
- B. Weight of the material in pounds per gallon
- C. Percent by weight of all VOCs for each material used

(Plantwide emissions of VOC)

D. Amount of VOCs emitted on a monthly basis

Condition #15 :

- (Inspection and Maintenance Plan Chart)
- A. Note the inspectors name
- B. The date of the inspection
- C. Result of the inspection

D. Maintenance that occurred and date

- 18. All installations and facilities authorized by this AO shall be adequately and properly maintained. All pollution control vendor recommended equipment shall be installed, maintained, and operated. Instructions from the vendor or established maintenance practices that maximize pollution control shall be used. All necessary equipment control and operating devices such as pressure gauges, amp meters, volt meters, flow rate indicators, temperature gauges, CEMs, etc., shall be installed and operated properly and easily accessible to compliance inspectors.
- 19. The owner/operator shall comply with R307-1-3.5, UAC. This rule addresses emission inventory reporting requirements.
- 20. The owner/operator shall comply with R307-1-4.7, UAC. This rule addresses unavoidable breakdown reporting requirements. The owner/operator shall calculate/estimate the excess emissions whenever a breakdown occurs. The total of excess emissions shall be reported to the Executive Secretary as directed for each calendar year.
- 21. The owner/operator shall submit to the Executive Secretary an emergency plan within 60 days of the date of this AO. The plan shall identify what control/production measures the owner/operator shall implement when an emergency episode is declared by the Executive Director of the Department of Environmental Quality. Specific emission reduction measures shall be outlined for all three levels (Alert, Warning, Emergency). The values for the various levels are listed in R307-1-5, UAC. The emergency plan shall be approved by the Executive Secretary. The Alert Level actions to be taken should be curtailment of all unnecessary activities causing air pollution. The other two levels of actions should be a progressive curtailment of production and activities causing pollution, to the point of complete shutdown of operations.
- 22. The owner/operator shall comply with all the applicable requirements implemented in conjunction with the Ozone State Implementation Plan (SIP).

Any future modifications to the equipment approved by this order must also be approved in accordance with R307-1-3.1.1, UAC.

This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including the UACR.

Annual emissions for this source (the entire plant) are currently calculated at the following values:

Pollutant

Tons/yr

A.	Particulate										•				•			•		•	32.8
B.	PM ₁₀	•				•	•			•							•				28.4
C.	SO ₂	•	•	•	•		•	•	•	•	•	•	•	•	•	•			•	•	. 0.0

D.	NO _x 0.6
E.	CO
F.	VOC

The following HAPs are included in the VOC emission rate listed above:

Α.	Toluene
В.	Xylene
C.	Ethylbenzene
D.	Methylethylketone
E.	Methylisobutylketone
F.	Formaldehyde
G.	Ethylene glycol monopropylether 5.2

These calculations are for the purposes of determining the applicability of Prevention of Significant Deterioration and Nonattainment area major source requirements of the UACR. Except for VOC they are not to be used for purposes of determining compliance.

In accordance with the requirements of Title V of the 1990 Clean Air Act, the following pollutants may be subject to an operating permit fee. Both the fees rate and the class of pollutants are subject to change by state, the federal agencies, or both.

Tons/vr Pollutant A. NO. B. VOC C. Approved B Russell A. Roberts, Executive Secretary Utah Air Quality Board



Michael O. Leavitt Governor Dianne R. Nielson, Ph.D. Essentive Director Russell A. Roberts Director

State of Utah

DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF AIR QUALITY

150 North 1950 West P.O. Box 144820 Salt Dake-City, Utah 84114-4820 (801) 536-4000 (801) 536-4099 Fax (801) 538-4414 T.D.D.

DAQE-189-95

FILE COPY

March 7, 1995

Newspaper Agency Corporation Legal Advertising Department P. O. Box 45838 Salt Lake City, Utah 84145

This letter will confirm the authorization to publish the attached NOTICE with the Salt Lake Tribune and Deseret News on March 10, 1995.

Please mail the invoice and affidavit of publication to the Utah State Department of Environmental Quality, Division of Air Quality, P.O. Box 144820, Salt Lake City, Utah 84114-4820.

Sincerely,

Diane Nielson Office Technician Division of Air Quality

dn

Enclosure

NOTICE

The following notice of intent to construct, submitted in accordance with Section 3.1, Utah Air Conservation Rules, has been received for consideration by the Executive Secretary, Utah Air Quality Board:

1. Dwayne Hirst

Olympia Sales Company

1537 South 700 West

Salt Lake City, Utah 84104

Permit Modification to Meet Standards of the Ozone Maintenance Plan

Salt Lake County

Annual Emission for This Source (The Entire Plant) Are Currently Calculated at the

Following Values:

Particulate	32.8
PM ₁₀	28.4
SO ₂	0.0
NO _x	0.6
CO	0.3
VOC	129.0

The engineering evaluation and air quality impact analysis have been completed and no adverse air quality impacts are expected. It is the intent of the Executive Secretary to approve the construction project.

The construction proposal and estimates of the effect on local air quality are available for public inspection and comment at the Division of Air Quality, Utah State Department of Environmental Quality, 150 North 1950 West, Salt Lake City, Utah 84114-4820. Written comments received by the Division.

at the same address on or before April 8, 1995, will be considered in making the final decision on the approval/disapproval of the proposed construction.

If anyone so requests to the Executive Secretary in writing, within 15 days of publication of the Notice, a hearing will be held to explain the project and technical rationale for proposed action. A hearing will be scheduled as close as practicable to the proposed project location. Comments obtained during a hearing will be evaluated and considered by the Executive Secretary before making a final decision on the approval/disapproval of the project.

Date of Notice: March 10, 1995

UTAH DIVISION OF AIR OUALITY NEW/MODIFIED SOURCE PLAN REVIEW

Ozone Maintenance Plan

Jon L. Black, Engineering Technician

TITLE V MAJOR

February 24, 1995

February 24, 1995

Dwayne Hirst

(801) 972-4050

(801) 972-1827

Dwayne Hirst Olympia Sales company 1537 South 700 West Salt Lake City, Utah 84104

RE:

ENGINEER:

DATE:

NOTICE OF INTENT DATED:

PLANT CONTACT:

PHONE NUMBER: FAX NUMBER

PLANT LOCATION:

1537 South 700 West, Salt Lake City, Utah

Modification of Approval Order to Meet Standards of the

Salt Lake County, CDS A1, NA; TOXICS MAJOR,

UTM COORDINATES:

4,509,700 m. Northing; 422,900 m. Easting

FEES:

 Basic Approval Order Fee	\$00 0.00
Review Engineer - 0 total hours at \$50.00/hour	\$000. 00
Modeler - 0 hours at \$50.00/hour	\$000.00
Notice To Paper	\$80.00
Travel - 00 miles at \$0.23/mile	<u>\$000.00</u> \$80.00

APPROVALS:

Review Engineer

(Signature & Date)

We request that you read the proposed Approval Order conditions; if you do not understand or do not agree with the contents of the conditions. please contact the review engineer within five days. However, when you understand the attached proposed/draft Approval Order conditions, please sign below and return. Thank You.

Applicant Contact

(Signature & Date) F:\AQ\ENGINEER\JBLACK\WP\REVIEWS\OLYMPIA.RVW

4.2.5-14

-19/95

TYPE OF IMPACT AREA

Attainment Area No
Nonattainment Area PM ₁₀ Yes SO ₂ Yes NO _x No CO Yes Ozone Yes
NSPS No
NESHAP No
Toxic Pollutants
toluene, xylene, ethyl benzene, methyl ethyl ketone, methyl isobutyl ketone, formaldehyde
Toxic Major Source
[> 10 tpy of any one Hazardous Air Pollutant (HAP) or > 25 tpy of any combination of HAPs]
New Major Source
Send to EPA

4.2.5-15

FOR MODIFIED SOURCES

The Notice of Intent is for a modification to an existing source. The following standards apply in this review:

NSPS applies to modification?	No
PSD review of entire source required?	No
NESHAPS applies to modification?	No
TOXICS involved in modification?	No
TITLE V required for entire source?	Yes
TOXIC MAJOR for modification?	No
NONATT MAJOR for entire source?	Yes

:

Abstract

Olympia Sales Company manufactures kitchen cabinets. They are located at 1537 South 700 West, Salt Lake City, Utah, which is a Nonattainment area for PM₁₀, SO₂, CO and Ozone. Olympia Sales possess a current Approval Order (AO) DAQE-0167-94 for its facility. The cabinet manufacturing facility is a major source of VOC emission and will be required to meet Reasonable Available Control Technology (RACT). RACT will be imposed in order to comply with the requirements of the Ozone Maintenance Plan. RACT will require that all of the painting processes be equipped with High Volume Low Pressure (HVLP) paint guns. Olympia's conventional paint guns will all be replaced by the HVLP guns by November 15, 1995. Olympia will also be required to implement a maintenance and inspection plan which will record dates and times of inspections and repairs to the painting processes. The new employees will be required to go through a training period where an experienced painter is with the new painter at all times when spraying. The new employee shall not use the paint spraying equipment without supervision until they have shown that they are experienced and competent in performing the painting tasks which are required of them. Olympia has recently experimented with low VOC water based paints and has found that problems of excessive drying time and below standard finish quality exist from use of these products. Olympia is continuing to research the new low VOC products on the market but will not be required to use these products at this time. The emissions of concern from this facility will remain at 129 tons/yr of VOC, 32.8 tons/yr of Particulate and 28.4 tons/yr of PM_{10} These emission totals have been modeled for the previous permit mentioned above. Therefore, further modeling will not be required. Because Olympia Sales is a major toxic source, a Title V permit will be required.

I. <u>DESCRIPTION OF PROPOSAL</u>

Olympia Sales Company is a manufacturer of wood kitchen cabinets. They have been operating in Salt Lake City since 1956. Over the years their production level has fluctuated with the demand for kitchen cabinets but their overall configuration has remained basically the same.

With the implementation of the Ozone Maintenance Plan, major sources of VOC are required to meet standards developed in RACT. These standards further aid in limiting VOC emission and require sources to make a few changes in their operations. The changes which will be addressed will be the following:

- 1. All painting processes will be required to install HVLP spray guns
- 2. Implementation of an Inspection and Maintenance Plan
- 3. Continual research in usage of low VOC paints
- Employee training procedures
- 5. Paint barrel storage
- 6. Record keeping

II. EMISSION SUMMARY

The emissions from this source (the entire plant) will be as follows:

Pollutant	Current Emissions	Emission Increases	Total Emissions
	tons/year	tons/year	tons/year
Particulate	32.80	0.00	

4.2.5-17

Engineering Review: Olympia Sales - Revised AO For Ozone Maintenance Plan

March 9, 1995 Page 4

SO_2	 0.00	 0.00	 0.00
NO	 0.60	 0.00	 0.60
CO .	 0.30	 0.00	 0.30
VOC	 129.00	 0.00	 29.00

The HAPs included in the VOC emission rate listed above:

Toluene	50.2	. 0.00	50.2
Xylene	19.5	. 0.00	19.5
Ethylbenzene	. 0.1	. 0.00	0.1
Methylethylketone	. 0.01	. 0.00	0.01
Methylisobutylketone	29.3	. 0.00	29.3
Formaldehyde	. 0.3	. 0.00	0.3
Ethylene glycol monopropylether	5.2	. 0.00	5.2

III. REASONABLE AVAILABLE CONTROL TECHNOLOGY (RACT) ANALYSIS

The Clean Air Act Amendments of 1990 require this type of coating operation to employ Reasonable Available Control Technology (RACT). RACT is defined as devices, systems process modification, or other apparatus or techniques that are reasonable available taking into account (1) the necessity of imposing such controls in order to attain and maintain a national ambient air quality standard, (2) the social, environmental and economic impact of such controls, and (3) alternative means of providing for attainment and maintenance of such standard. The draft CTG document, Appendix B. 'Preliminary Draft Model Rule For Wood Furniture Finishing And Cleaning Operations', dated April 1994, was used as a guide in the RACT determination. RACT for this source shall be as follows:

HVLP Sprav Guns

Olympia has consented to purchase new Graco H.E.L.P. HVLP spray guns for all of their painting processes. These guns will all be purchased and installed by November 15, 1995.

Inspection and Maintenance Plan

Once each month all pumps, piping, hoses and guns of each painting process will be visually inspected for leakage: A chart will be posted on the pump room wall of Olympia Sales Company which will note the inspectors name, the date of the inspection, and the result of the inspection. The chart will also record any maintenance which takes place and the associated date.

New Employee Training

New employees will be required to go through a training period where an experienced painter is present with the new painter at all times when spraying. The new employee shall be instructed in spraying techniques to give the best possible finish without wasting paint. They shall also be properly trained in inspection techniques which are addressed in the Inspection and Maintenance Plan. New employees shall not use the paint spraying equipment without supervision until they have shown that they are experienced and competent in performing the painting tasks which they are asked to do.

Paint Barrel Storage

Full paint and solvent barrels are stored inside a room, which has a two hour fire rating, with sealed lids until they are ready to be used in the painting operation. The barrels are attached to the painting process

with a covered lid. Once the paint barrel becomes empty it is removed from the process and re-sealed with their lid. The empty barrels are placed in a storage area for pickup.

Paint Booth and Gun Cleaning

Olympia has five spray booths for applying coatings to wood. Each spray booth is equipped with a negative pressure filter system for the removal of particulates. The booths themselves are cleaned by scraping off the overspray material. No solvents are used in cleaning the spray booths. The paint gun tips are the only part of the gun cleaned at the Olympia location. The tips are removed and cleaned by soaking them in a small can (6-12 oz.) of T-6 solvent. When guns require further cleaning they are sent out to other locations.

Low VOC Water-based Coatings

Olympia will be required to experiment further with the implementation of low VOC water-based coatings. Each year Olympia will be required to submit a report analyzing the newest coatings tested by their facility. Because new technology does not come out on a timely basis, Olympia will be required to test new low VOC coatings or water-based coatings as they become available. Therefore, Olympia's annual report may at times consist of why no new tests were done.

IV. <u>APPLICABILITY OF FEDERAL REGULATIONS, UTAH ADMINISTRATIVE CODES</u> (UAC), AND CLEAN AIR ACT AMENDMENTS OF 1990.

This Notice of Intent is for an existing source. It is not a new major source or a major modification. The following federal regulations and state rules have been examined to determine their applicability to this Notice of Intent:

- 1. R307-1-3.1, UAC Notice of Intent required for a modified source. This rule applies.
- 2. R307-1-3.1.5, UAC Continuous program of construction required to begin within eighteen months of Approval Order date. If a continuous program of construction is not proceeding, the Executive Secretary may revoke the Approval Order.
- 3. R307-1-3.1.8 (A), UAC Application of best available control technology (BACT) required for this facility. This rule shall not apply. However, the CAAA of 1990. Section 172, requires that this source apply RACT. The CTG draft model rule for wood furniture finishing and cleaning operations, Appendix B, was used as a guide in the RACT determination.
- 4. R307-1-3.1.8 (C), UAC Approval of the Utah Air Quality Board (UAQB) is required before the Executive Secretary can approve a source under Section 3.6.5 that consumes more than 50% of a PSD increment. This rule does not apply to this NOI because a PSD permit is not being issued.
- 5. R307-1-3.2.1, UAC Particulate emission limitations for existing sources that are located in a nonattainment area. This rule has been superseded by the Section IX. Parts A and H of the SIP except for Weber County. The effective date is November 15, 1990. Sources listed in Weber County are as follows:
 - A. Farmers Grain Coop
 - B. Fife Rock Products
 - C. Interpace Corporation

- D.. Parsons Asphalt Plant
- E. Pillsbury Company
- F. Teledyne Incinerator
- G. Gibbons and Reed Asphalt

This source is not listed in the SIP. Therefore, this rule does not apply.

- 6. R307-1-3.3.2, UAC Review requirements for new major sources or major modifications that are located in a nonattainment area or which impact a nonattainment area. This Notice of Intent does not represent a new major source or a major modification. Therefore, this rule will not apply.
- 7. R307-1-3.3.3.B (2), UAC Enforceable offset of <u>1.2:1</u> required for new sources or modifications that would produce an emission increase greater than or equal to 50.00 tons per year of any combination of PM₁₀, SO₂, and NO_x. This is required in Salt Lake, Davis, and Utah Counties and in any area that affects these three counties as defined in the rule. The effective date is November 15, 1990. This modification does not affect the emissions from this facility, therefore this rule will not apply.
- 8. R307-1-3.3.3.C, UAC Enforceable offset of <u>1.15:1</u> required for new sources or modifications of sources as defined in Section 182 of the CAA. Section 182(b)(1)(A)(i) of the CAA defines these sources as sources of volatile organic compounds and as sources of oxides of nitrogen. This is required in Salt Lake, Davis, and Utah Counties and in any area that affects these three counties as defined in the rule. The effective date is August 16, 1993. This rule does not apply.
- 9. R307-1-3.5, UAC Emission inventory reporting requirements. This rule requires any source that emits 25 tons or more per year of any pollutant or any Part 70 source to submit an emission inventory to the Division of Air Quality every year or as determined necessary by the Executive Secretary. This source must comply with this rule.

10.

R307-1-3.6.3, UAC - Prevention of Significant Deterioration (PSD) Increment Consumption - This rule lists the allowable PSD increment consumption. Under the PSD rules, the entire state has been triggered for Particulate (TSP), SO₂, and NO_x. The allowable increments are as follows:

Particulate (TSP) $(\mu g/m^3)$

Thr	<u>ee Hour</u>	<u>24 Hour</u>	Annual	
Class I Area Class II Area	N/A			
	$SO_2 \ (\mu g/m^3$)		
Class I Area	25 512			
	NO _x (µg/m ³	⁽)		
Class I Area Class II Area	N/A N/A	N/A	2.5 	
Engineering Review: Olympic	Sales - Revised	AO For Orong Mainton	4 2.5-2	0

Engineering Review: Olympia Sales - Revised AO For Ozone Maintenance Plan

There are also Class III increments, which do not apply in Utah. The above increments apply at all locations, unless the area is already nonattainment. The entire increment may not be available at all locations due to previously permitted sources consuming increment.

- 11. R307-1-3.6.5 (b), UAC Prevention of Significant Deterioration (PSD) review requirements for new major sources or major modifications. This Notice of Intent does not represent a new major source or a major modification under PSD rules. Therefore, this rule does not apply.
- 12. R307-1-3.6.6, UAC Increment violations. This rule requires the UAQB to promulgate a plan and implement rules to eliminate any PSD increment violations that occur in the state. No known violations have yet occurred. This proposed Notice of Intent is located in Salt Lake County which is an attainment area for NO_x . The emissions of NO_x from this source are negligible and will not cause a increment violation.
- 13. R307-1-3.7, UAC Air Quality Modeling All estimates of ambient concentrations required in meeting the requirements of the regulations shall be based on appropriate air quality models, data bases, and other requirements specified in the Utah Guidelines to Air Quality Models. Modeling analysis is not routinely performed for air pollution sources with emissions below the following levels:

Criteria for Screen Modeling (≥ Tons per Year)

- 14. R307-1-3.8, UAC Stack height rule. This rule limits the creditable height of stacks to that height determined to be good engineering practice. The formulas used to determine good engineering practice are found in 40 CFR 51.100. The maximum creditable height of 65 meters (213.2 feet) is allowed. Olympia Sales has no stacks that exceed 65 meters in height. This facility is in compliance with this rule.
- 15. R307-1-3.10, UAC Visibility screening analysis requirements. This rule requires all new major sources or major modifications to undergo a visibility screening analysis to determine visibility impact on any mandatory Class I area. This Notice of Intent does not represent a new major source or a major modification under UACR rules. Therefore, this rule does not apply.
- 16. R307-1-4.1.2, UAC 20% opacity limitation at all emission points. Unless a more stringent limitation is required by New Source Performance Standards (NSPS) or BACT or National Emission Standards for Hazardous Air Pollutants (NESHAPS). In this case, an opacity limitation of 10% is recommended as BACT for the cyclone dust collector.
- 17. R307-1-4.1.9, UAC EPA Method 9 shall be used for visible emission observations. This rule applies.
- 18. R307-1-4.2.1, UAC Sulfur content limitations in oil and coal used for combustion.

This source, emission point, does not use oil or coal for combustion. This rule does not apply.

- 19. R307-1-4.6, UAC <u>Continuous Emission Monitoring Systems Program</u> Reporting and technical requirements for continuous emission monitoring systems. It covers breakdowns and quarterly reports for continuous monitoring systems. Section 4.6.5 states that this regulation applies to the following:
 - A. Sources required to install a CEMS as required by the following documents:
 - 1) NSPS
 - 2) State Implementation Plan
 - 3) Approval Order
 - 4) Consent Decree
 - 5) Administrative Orders and Agreements
 - B. Any source that constructs after the promulgation of this rule two or more emission points, which may interfere with VEOs, shall install an opacity monitor on each stack.
- 20. R307-1-4.7, UAC Unavoidable breakdown reporting requirements. This rule applies. Section 4.7.1 discusses reporting requirements. A breakdown for any period longer than two hours must be reported to the Executive Secretary within three hours of the beginning of the breakdown, if reasonable, but in no case longer than 18 hours after the beginning of the breakdown. A written report is required within seven calendar days. The report shall include the estimated quantity of pollutants (total and excess). R307-1-4.7.2 discusses penalties,
- 21. R307-1-4.9, UAC Review requirements for volatile organic compound (VOC) sources located in an ozone nonattainment area. For sources located in ozone nonattainment areas (Salt Lake and Davis Counties) this rule specifies the minimum (RACT) control measures promulgated by the Utah Air Quality Board. In addition, UACR 3.1.1 requires application of BACT for all new or modified sources in the state. However, within an ozone nonattainment area BACT can not be less stringent than RACT. Therefore, for ozone nonattainment areas the more stringent requirement is applicable (i.e., BACT as required by UACR 3.1.1 or RACT as defined by rule 4.9).

This rule applies only in Salt Lake and Davis Counties. The process is not specifically covered in this section. RACT conditions will be imposed which consist of (1) all painting processes will be required to install HVLP spray guns, (2) implementation of an Inspection and Maintenance Plan. (3) continual research in usage of low VOC paints and water-based coatings, (4) employee training procedures and (5) paint barrel storage.

22. R307-1-5, UAC - Emergency episode requirements. This rule requires the Executive Secretary to determine the stage and extent of an air pollution episode based on pollution levels and meteorological conditions. Under Section 40 of the Code of Federal Regulations, Part 51. Subpart H (51.150 to 153), it is required that sources plan emergency measures based upon the severity of the nonattainment area in which they operate. In Utah, these rules require that CO sources in CO nonattainment areas and sources of ozone precursors in ozone nonattainment areas, who emit at least 25 tons per year (SIP Section VII.B.) of either pollutant, submit an Emergency Episode Plan which provides for additional pollution reductions in the event of an Air Pollution Alert.

Warning or Emergency Episode. These plans can include total shut-down of the process. (Some sources are required to submit an emergency episode plan according to Section VII.B. of the SIP). This rule applies.

- 23. 40 CFR, Part 60 New Source Performance Standards (NSPS) There is no NSPS for this industrial process.
- 24. 40 CFR, Part 61 National Emission Standards for Hazardous Air Pollutants (NESHAP) -There is no NESHAP for this industrial process.
- 25. 40 CFR, Part 50 National Ambient Air Quality Standards (NAAQS) This source is located in <u>Salt Lake County</u>, which is a nonattainment area for PM₁₀, SO₂, ozone, and CO (Salt Lake City only).

For VOC emissions, there is no model that can predict an ozone impact directly from VOC emissions. However, since VOCs are precursors to ozone formation, this new source will contribute to the existing exceedences of the ozone standard in Davis or Salt Lake County. The amount of that contribution has not been decided. The ozone nonattainment area of Davis and Salt Lake Counties must show reasonable further progress toward attainment of the standard. This source, along with all other VOC sources having emissions above ten tons per year, may have to apply more controls to lower the VOC emissions. This would be a SIP change action.

- 26. 40 CFR 60.14, <u>Definition of Modification</u> Any physical or operational change to an existing facility that results in an increase in the emission rate to the atmosphere of any pollutant to which an NSPS standard applies. This review is modification to implement RACT to meet the Ozone Maintenance Plan.
- 27. 40 CFR 60.15, <u>Definition of Reconstruction</u> This Notice of Intent is not a reconstruction.
- 28. R307-1-1, <u>Definition of Major Modification</u> It means any physical change in or changes in the method of operation of a major source that would result in a significant net emission increase of any pollutant. A net emissions increase that is significant for VOC shall be considered significant for ozone. This Notice of Intent is not a major modification.

V. <u>RECOMMENDED APPROVAL ORDER CONDITIONS</u>

General Conditions:

1. This AO applies to the following company:

Olympia Cabinet Manufacturing and Sales Company 1537 South 700 West Salt Lake City, Utah 84104 (801) 972-4050

The equipment listed below in this AO shall be operated at the following location:

PLANT LOCATION:

Olympia Cabinet Manufacturing and Sales Company 1537 South 700 West Salt Lake City, Utah 84104

Universal Transverse Mercator (UTM) Coordinate System: 4,509,700 meters Northing, 422,900 meters Easting

- 2. Definitions of terms, abbreviations, and references used in this AO conform to those used in the UACR, Utah Administrative Codes (UAC), and Series 40 of the Code of Federal Regulations (40 CFR). These definitions take precedence unless specifically defined otherwise herein.
- 3. Olympia Cabinet Manufacturing and Sales Company shall operate the cabinet manufacturing facility according to the information submitted in the Notice of Intent dated January 5, 1995 and additional information submitted to the Executive Secretary dated February 24, 1995..
- 4. A copy of this AO shall be posted on site. The AO shall be available to the employees who operate the air emission producing equipment. These employees shall receive instruction, per condition 16 of this AO, as to their responsibilities in operating the equipment according to all of the relevant conditions listed below.
- 5. The approved installations shall consist of the following equipment:
 - A. Five (5) Binks spray booths equipped with Andreae filters
 - B. Three (3) cyclone dust collectors
 - #1 Mill Area operating at approximately 12,000 cfm
 - #2 Door Area operating at approximately 14,000 cfm
 - #3 Sanding Area operating at approximately 25,000 cfm

Limitations and Tests Procedures

6. Visible emissions from the #3 cyclone dust collector shall not exceed 10% opacity. Visible Emissions from any other point or fugitive emission source associated with the installation or control facilities shall not exceed 20% opacity. Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9.

- 7. The following operation limits shall not be exceeded without prior approval in accordance with R307-1-3.1, UAC:
 - A. 16 hours per day
 - B. 4160 hours per 12-month period

Compliance with the annual limitations shall be determined on a rolling 12-month total. Based on the first day of each month, a new 12-month total shall be calculated using data from the previous 12 months. Records of operation shall be kept for all periods when the plant is in operation. Records of operation shall be made available to the Executive Secretary or his representative upon request, and shall include a period of two years ending with the date of the request. The records shall be kept on a daily basis. Hours of operation shall be determined by supervisor monitoring and maintaining of an operations log.

Volatile Organic Compounds (VOC) Limitations

- 8. Each paint spray booth shall be equipped with a set of paint arrestor particulate filters to control particulate emissions or equivalent. All air exiting the booth shall pass through a control system before being vented to the atmosphere. Equivalency shall be determined by the Executive Secretary.
 - 9. Full paint and solvent barrels shall be kept in a proper storage room. The barrels shall have sealed lids until they are ready to be used in the painting operation. Once a paint barrel becomes empty it shall be removed from the painting process and re-sealed with a lid. The empty barrels shall be placed in a storage area to await pickup.
 - 10. The plantwide emissions of VOC and HAPS from the lacquer spray booths, solvent cleaning and associated surface coating operations shall not exceed:

<u>129.0 tons per rolling 12-month period for VOC</u> 104.6 tons per rolling 12-month period for HAPs

This value shall not be exceeded without prior approval in accordance with R307-1-3.1. UAC. Compliance with the limitation shall be determined on a rolling 12-month total. Based on the first day of each month a new 12-month total shall be calculated using data from the previous 12 months.

The plant-wide emissions of VOCs and HAPs shall be determined by maintaining a record of VOC and HAPs potential contained in materials used each month. The record shall include the following data for each item used:

- A. List name of the VOC and HAPs emitting material, such as: paint, adhesive, solvent, thinner, reducers, chemical compounds, toxics, isocyanates, etc.
- B. List the weight and use location of the VOC and HAPs potential (name of paint booth or plant facility) in the material in pounds per gallon
- C. List the percent by weight of all potential VOCs and HAPs each individual material listed in A. The recommended source of the information is from the

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manufacturer's MSDS¹ The owner/operator shall obtain MSDS data from manufacturer and retain information on-site.

- D. List the amount and location of materials listed in A that are used on a daily basis and summed for every location and for the entire plant each month
- E. To calculate the amount of VOCs and HAPs potential contained in the material listed in D use the following procedure:

VOC or HAPs =
$$(\frac{\% \text{ Volatile by Weight}}{(100)} \times (\frac{\text{Density lb}}{(2,000 \text{ lb})} \times (\frac{1 \text{ ton}}{(2,000 \text{ lb})})$$

- F. The amount of VOCs and HAPs potential contained in materials disposed of as solid or hazardous waste for the month shall be quantified and subtracted from the quantities calculated above, to provide the monthly total VOC and HAPs emissions put into the air. (It is assumed that all VOC and HAPs potential in material that are applied to a product evaporate and are considered emissions.
- G. Records of consumption and emissions shall be kept for all periods when the plant is in operation. Records of consumption shall be made available to the Executive Secretary upon request, and shall include a period of two years ending with the date of the request.
- 11. The owner/operator of this installation shall use best working practices to reduce coating and solvent emissions. This includes the following control measures:
 - A. Conversion of lacquers and other surface coatings to water-based compounds as practicable The Executive Secretary shall be informed of the progress made in this area. The owner/operator shall submit a written report to the Executive Secretary each year by January 31.
 - B. Minimizing solvent usage The Executive Secretary shall be informed of the progress made in this area. The owner/operator shall submit a written report to the Executive Secretary each year by January 31.
 - C. Storing volatile raw materials in tightly sealed containers.
- 12. All HAPs are subject to the annual Operating Permit Program if one of the following conditions is met:
 - A. The emissions of any one of the 189 HAPs listed in the 1990 Clean Air Act is over 10 tons/yr
 - B. The emissions of any combination of these HAPs are over 25 tons/yr
- 13. This source is required to pay an annual emission fee upon start-up [or if an existing facility, upon issuance of this AO. The fee will be based on calculated annual emissions listed at the end of this AO. This fee is valid until inventory data for one year are available for the source. The owner or operator of this source will be billed upon start-up for all emissions that are considered "chargeable" as of that date.

¹MSDS = Material Safety Data Sheets.
14. Olympia Cabinet Manufacturing and Sales Company shall use HVLP spray guns for all of their painting processes. These guns shall all be installed and be used by November 15, 1995.

Records & Miscellaneous

- 15. An Inspection and Maintenance Plan shall be used in the painting operation. This plan shall require that one time each month all pumps, piping, hoses and spray guns of each painting process shall be visually inspected for leakage. A chart shall be posted on the pump room wall of Olympia Cabinet Manufacturing and Sales Company which shall note the inspectors name, the date of the inspection, and the result of the inspection. The chart shall also record all maintenance of the pumps, piping, hoses and spray guns which takes place and the associated date. The plan shall be made available to the Executive Secretary or his representative upon request.
- 16. New employees shall be required to go through a training period where an experienced painter is present with the new painter at all times when spraying. The new employee shall be instructed in spraying techniques to give the best possible finish without wasting paint. They shall also be properly trained in inspection techniques which are addressed in the Inspection and Maintenance Plan. New employees shall not use the paint spraying equipment without supervision until they have shown that they are experienced and competent in performing the painting tasks required of them.
- 17. Records referenced in condition #7, condition #10 and condition #15 of this Approval Order shall be made available to the Executive Secretary or his representative upon request. The records referenced shall consist of the following:

<u>Condition #7</u> : (Operating hours)

A. Operating hours per day

Condition #10 :

(Plantwide emissions of VOC)

- A. Name and type of VOC emitting material
- B. Weight of the material in pounds per gallon
- C. Percent by weight of all VOCs for each material used
- D. Amount of VOCs emitted on a monthly basis

Condition #15 :

(Inspection and Maintenance Plan Chart)

- A. Note the inspectors name
- B. The date of the inspection
- C. Result of the inspection

D. Maintenance that occurred and date

18. All installations and facilities authorized by this AO shall be adequately and properly maintained. All pollution control vendor recommended equipment shall be installed. maintained, and operated. Instructions from the vendor or established maintenance practices that maximize pollution control shall be used. All necessary equipment control and operating devices such as pressure gauges, amp meters, volt meters, flow rate indicators, temperature gauges, CEMs, etc., shall be installed and operated properly and easily accessible to compliance inspectors.

- 19. The owner/operator shall comply with R307-1-3.5. UAC. This rule addresses emission inventory reporting requirements.
- 20. The owner/operator shall comply with R307-1-4.7, UAC. This rule addresses unavoidable breakdown reporting requirements. The owner/operator shall calculate/estimate the excess emissions whenever a breakdown occurs. The total of excess emissions shall be reported to the Executive Secretary as directed for each calendar year.
- 21. The owner/operator shall submit to the Executive Secretary an emergency plan within 60 days of the date of this AO. The plan shall identify what control/production measures the owner/operator shall implement when an emergency episode is declared by the Executive Director of the Department of Environmental Quality. Specific emission reduction measures shall be outlined for all three levels (Alert, Warning, Emergency). The values for the various levels are listed in R307-1-5, UAC. The emergency plan shall be approved by the Executive Secretary. The Alert Level actions to be taken should be curtailment of all unnecessary activities causing air pollution. The other two levels of actions should be a progressive curtailment of production and activities causing pollution, to the point of complete shutdown of operations.
- 22. The owner/operator shall comply with all the applicable requirements implemented in conjunction with the Ozone State Implementation Plan (SIP).

Any future modifications to the equipment approved by this order must also be approved in accordance with R307-1-3.1.1, UAC.

This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including the UACR.

Annual emissions for this source (the entire plant) are currently calculated at the following values:

	Pollutant Tons/vr
A.	Particulate
B.	PM ₁₀ 28.4
C.	SO ₂ 0.0
D.	NO _x 0.6
E.	CO
F.	VOC 129.0

The following HAPs are included in the VOC emission rate listed above:

A.	Toluene
В.	Xylene 19.5
C.	Ethylbenzene
D.	Methylethylketone
E.	Methylisobutylketone
F.	Formaldehyde
G.	Ethylene glycol monopropylether 5.2

These calculations are for the purposes of determining the applicability of Prevention of Significant Deterioration (PSD) and nonattainment area major source requirements of the UACR. Except for VOC they are not to be used for purposes of determining compliance.

In accordance with the requirements of Title V of the 1990 Clean Air Act, the following pollutants may be subject to an operating permit fee. Both the fees rate and the class of pollutants are subject to change by state, the federal agencies, or both.

	Pollutant	<u>Tons/yr</u>
А. В.	PM ₁₀	28.4
C.	VOC	12 9 .0

Engineering Review: Olympia Sales - Revised AO For Ozone Maintenance Plan March 9, 1995 Page 16

This is a very brief description of how Olympia's paint operations is being managed to limit VOC's.

Paint Guns-

Olympia started changing spray guns over to air assisted airless guns in 1993 and will have all production paint guns changed by October 1995.

Paint Barrels-

All barrels of paint and solvent are covered at all times.

Maintenance-

The entire paint system is checked for leaks at least once each week and repaired within three days unless new parts are needed, that maintenance cannot locate in Salt Lake and then repairs are made as the needed materials become available.

Cleaning-Booths and Guns-

Small amounts of organic solvents are used to clean booths and guns - 8 to 12 oz. Per day, approximately 3 gallons of solvent are used each week to flush out the paint pumps and piping, but this solvent is put into drums for disposal. Therefore, VOC's are not released.

Training-

All new painters are given several hours of instruction covering spraying technique to give the best possible finish without wasting paint.

Paint and Stains-

See MSDS sheets.



2465 South 1100 West Woods Cross, Utah 84087 (801) 292-0437 FAX (801) 298-75

12 Drains/in

LYMPIA SALES 537 SOUTH 7TH WEST ALT LAKE CITY, UT 84104 March 01, 199

ITTN: Safety Director

lear Customer,

This letter is to inform you that the product listed below that we supply you contains one or more of the toxic chemicals covered by Section 313 of the Emergency Flanning and Community Right-to-Know Act of 1986. This haw requires certain manufacturers to report on annual emissions of specified toxic chemicals and chemical categories.

If you are unsure if you must report, or require further information, call the EFA Emergency Planning and Community Right-to-Know Hotline : (1) 535-0202 or (202) 479-2449 (in Washington DC or Alaska).

Please attach this letter to the Material Safety Data Sheet(s) For this product. Please also note that if you repackage or otherwise redistribute this product to industrial customers, this letter must accompany the MSDS.

Our Freduct 016603

Name 5238 GUARDSMAN BLEND 392#/55 GAL EA EX DRS

Foxic Chemical

THYL BENZENE

Fercent C.A.S. # BY WEIGHT 100-41-4 4.06% 108-10-1 18.73% 108-88-3 60.95% 1330-20-7 16.26%

Guardsman Products,	Inc.	en diend •	MATERIAL	SAFETY	DATA SHEE	ΕT	
) F PREPARATION:	01/08/94			CHERCE			
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4ANUFACTURERS ADDRESS:	13535 MONS SEATTLE, W	TER ROAD 98178		24-HOL PHONE	IR EMERGEN Chentres	NCY RESP 800-42 PAGE	ONSE 4-930 1 OF
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	SECTION	II: HAZA	RDOUS ING	REDIENTS	5		
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KEY TO ABBREV +: SK: NE: OTHER:	IATIONS U SARA III TOXIC EFF NOT ESTAB RECOMMEND	SED: - SECTION 3 ECTS CAN OC LISHED ED TLV	13 TOXI CUR BY	C CHEMIC SKIN AB CE	CAL SORPTION CEILING	LIMIT		
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1 Guardsman Products, Inc.		PRODUCT:	5 25-057	'3 F	AGE 2	0F 4
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TN LOW AREAS. OR MAY TONTE AT	I AIR AND I I TATATA	HAT IKAVEL		WEID ON OR	LULLECT	
CONTAINER, EVEN WHEN EMPTY.					ACAR	
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SECTION	V: HÉ	ALTH HAZAR:	DATA			
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TIONS TO AVOID:						
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FOR INDUSTRIAL USE ONLY

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	1 Guardsman Pro	ducts, Inc.			P R (DUCT:	525-0573	PAGE	4_01	F 4
		SECTION	x:	SHIPPING	AND	LABEL	INFORMATION			*==
I.	SHIPPING NAME:	PAINT	*****		Fi din din city o				•	-

OT ID NO: UN1263

DOT HAZARD CLASS: 3

PG: II

RECAUTIONARY LABEL STATEMENT: 0564B

WARNING! FLAMMABLE. HARMFUL IF INHALED. MAY AFFECT THE BRAIN OR NERVOUS SYSTEM CAUSING DIZZINESS. HEADACHE OR NAUSEA. CAUSES EYE. SKIN. NOSE AND THROAT IRRITATION. MAY BE HARMFUL IF ABSORBED THROUGH SKIN.

IONTAINS ORGANIC SOLVENTS. KEEP AWAY FROM HEAT, SPARKS AND FLAME. VAPORS HAY AUSE FLASH FIRE. CLOSE CONTAINER AFTER EACH USE. USE WITH ADEQUATE 'ENTILATION. DO NOT BREATHE VAPORS OR SPRAY MIST. WEAR AN APPROPRIATE, 'ROPERLY FITTED RESPIRATOR (NIOSH/MSHA APPROVED) DURING AND AFTER APPLICATION INTIL FUMES ARE GONE, UNLESS AIR MONITORING DEMONSTRATES VAPOR/MIST LEVELS ARE BELOW APPLICABLE LIMITS. FOLLOW RESPIRATOR MANUFACTURER'S DIRECTIONS FOR (ESPIRATOR USE. AVOID CONTACT WITH EYES, SKIN AND CLOTHING. WASH THOROUGHLY AFTER HANDLING.

FIRST AID: IN CASE OF EVE CONTACT, FLUSH WITH PLENTY OF WATER FOR AT LEAST 15 (INUTES AND GET MEDICAL ATTENTION; FOR SKIN, WASH THOROUGHLY WITH SOAP AND JATER. IF AFFECTED BY INHALATION OF VAPOR OR SPRAY MIST, REMOVE TO FRESH AIR. [F SWALLOWED, GET MEDICAL ATTENTION IMMEDIATELY.

I ASE OF SPILLAGE, ABSORD WITH INERT MATERIAL AND DISPOSE OF IN ACCORDANCE WITH APPLICABLE REGULATIONS.

NOTICE: REPORTS HAVE ASSOCIATED REPEATED AND PROLONGED OCCUPATIONAL OVEREXPOSURE TO SOLVENTS WITH PERMANENT BRAIN AND NERVOUS SYSTEM DAMAGE. INTENTIONAL MISUSE BY DELIBERATELY CONCENTRATING AND INHALING THE CONTENTS MAY DE HARMFUL OR FATAL.

T' NFORMATION CONTAINED HEREIN IS BASED ON DATA BELIEVED TO BE RELIABLE BY S ROSMAN PRODUCTS; IT IS TRUE AND ACCURATE TO THE BEST OF OUR KNOWLEDGE, BUT IS NOT INTENDED TO BE ALL INCLUSIVE. USERS SHOULD CONSIDER THIS INFORMATION AS A SUPPLEMENT TO OTHER INFORMATION GATHERED BY THEM AND MUST MAKE THEIR OWN DETERMINATION OF SUITABILITY AND COMPLETENESS TO ASSURE PROPER SAFE USE AND DISPOSAL OF THESE MATERIALS. 4.2.5-35

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Guardsman Products,	Inc. Guardsa	man Ble.	MATERIAL	SAFETY DA	TA SHEE	T	
DAT DE PREPARATION:	02/03/94	-					
HAN ACTURERS NAME:	GUARDSMAN	- PRODUCTS,	INC.	PHONE NO)•: (2)	6)772+6	550
MANUFACTURERS ADDRESS:	13535 HONS Seattle, W	TER ROAD A 98178		2 4-HOU R Phone: C	EMERGEN Hemtred	ICY RESP BOD-+2 PAGE	ONSE 4-930(1 OF 4
	SECTION	I: PRO	DUCT INFOR	HATION			22223
PRODUCT NAME: GOLDEN H MANUFACTURERS CODE IDEN PRODUCT CLASS: PIGMENT	APLE STAIN TIFICATION: STAIN	CONCENTRA 525-007	TE 7 REA	HEALTH: CTIVITY:	HMIS RA 2 FL D PER	TING AMMABIL S. PROT	ITY: : ECT:
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KEY TO ABBREVIA +: SA SK: TO	ATIONS US ARA III - DXIC EFFE	SED: - SECTION 313 ECTS CAN DOCU	S TO JR BI	KIC CHEMICAL Y SKIN ABSORPTION	
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1 Guardsman Produ	cts, Inc.	PRODUCT: 5	25-0077	PAGE 2.0F 4
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- IMABILITY CLASSIF	ICATION: FLAMMABLE LI	QUID	CLASS I	B
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FLASH POINT: 20 D	EG F METHOD USE	D: TCC		
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1 Guardsman Products, Inc. PRDDUCT: 525-3077	PAGE 3 DF 4
SECTION VII: SPILL OR LEAK PROCEDURES	
ST. J TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: ELIMINATE ALL SOURCES OF IGNITION. CONTAIN SPILL AND ABSORD WITH MATERIAL SUCH AS SAND. SHOVEL INTO DRUMS OR DTHER SUITABLE CONTA NON-SPARKING TOOLS. NOTIFY APPROPRIATE AUTHORITIES IF SPILL ENTER JASTE DISPOSAL METHOD: INCINERATE IN AN APPROVED FACILITY OR DISPOSE OF IN ACCORDANCE WI STATE AND LOCAL REGULATIONS. DO NOT INCINERATE CLOSED CONTAINERS SECTION VIII: SPECIAL PROTECTION INFORMATION	ABSORBANT INERS USING S ENVIRONMENT. TH FEDERAL.
<pre>XESPIRATORY PROTECTION: IF TLV OF ANY COMPONENT IS EXCEEDED, USE AN APPROPRIATE NIOSH/MSH RESPIRATOR. FOLLOW RESPIRATOR MANUFACTURER'S DIRECTIONS FOR RESP /ENTILATION: PROVIDE SUFFICIENT MECHANICAL AND/OR LOCAL VENTILATION TO MAINTAI LEVELS BELOW THE TLV. APPLICATION AREAS SHOULD BE VENTILATED IN WITH OSHA REGULATION #29CFR1910.107D.</pre>	A APPROVED IRATOR USE. N EXPOSURE ACCORDANCE
PROTECTIVE GLOVES: USE NEOPRENE, RUBBER OR PLASTIC GLOVES TO PREVENT SKIN CONTACT. EYE PROTECTION: USE SAFETY GLASSES WITH SIDE SHIELDS. OTHER PROTECTIVE EQUIPMENT: SAFETY SHOWERS AND EYE BATH.	
SECTION IX: SPECIAL PRECAJTIONS	
PRL_AUTIONS TO BE TAKEN IN HANDLING AND STORING: KEEP AWAY FROM EXCESSIVE HEAT, SPARKS, AND OPEN FLAME. KEEP CLOS WHEN NOT IN USE. KEEP CONTAINERS UPRIGHT TO PREVENT LEAKAGE. DTHER PRECAUTIONS: CONTAINERS OF THIS MATERIAL MAY BE HAZARDOUS WHEN EMPTIED. SINCE CONTAINERS RETAIN RESIDUES, ALL HAZARD PRECAUTIONS MUST BE OBSERV DO NOT CUT, PUNCTURE OR WELD ON OR NEAR CONTAINER. CONTAINERS OF THIS MATERIAL MUST BE PROPERLY GROUNDED WHEN POURIN IF CONTENTS ARE COMBINED WITH OTHER MATERIALS SUCH AS THINNERS, C ETC, OBSERVE ALL PRECAUTIONS. WHEN SPRAYING THIS MATERIAL, KEEP SPRAY BOOTH CLEAN. AVOID BUILD SPRAY DUST OR OVERSPRAY IN BOOTH OR DUCTS.	URES TIGHT EMPTY ED. S. Atalysts. JP of

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FOR INDUSTRIAL USE ONLY

Guardsman Products, Inc. 525-0077 PAGE PRODUCT: 1 4 DF 4 SECTION X: SHIPPING AND LABEL INFORMATION

SHIPPING NAME: PAINT đ. 3

DOT ID NO: UN1263

DOT HAZARD CLASS:

PG: II

PRECAUTIONARY LABEL STATEMENT: 0547A

> DANGER! EXTREMELY FLAMMABLE. VAPORS MAY CAUSE FLASH FIRE. HARMFUL IF INHALED. MAY AFFECT THE BRAIN OR NERVOUS SYSTEM CAUSING DIZZINESS. HEADACHE DR NAUSEA. CAUSES EYE. SKIN. NOSE AND THROAT IRRITATION. MAY BE HARMFUL IF ABSORBED THROUGH SKIN.

CONTAINS ORGANIC SOLVENTS. KEEP AWAY FROM HEAT, SPARKS AND FLAME. VAPORS CAN TRAVEL LONG DISTANCES AND MAY IGNITE EXPLOSIVELY. CLOSE CONTAINER AFTER EACH USE WITH ADEQUATE VENTILATION. DO NOT BREATHE VAPORS OR SPRAY MIST. USE WEAR AN APPROPRIATE, PROPERLY FITTED RESPIRATOR (NIOSH/MSHA APPROVED) DURING AND AFTER APPLICATION UNTIL FUMES ARE GONE. JNLESS AIR MONITORING DEMONSTRATES VAPOR/MIST LEVELS ARE BELOW APPLICABLE LIMITS. FOLLIW RESPIRATOR MANUFACTURER'S DIRECTIONS FOR RESPIRATOR USE. AVOID CONTACT WITH EYES, SKIN WASH THOROUGHLY AFTER HANDLING. AND CLOTHING.

IN CASE OF EYE CONTACT, FLUSH WITH PLENTY OF WATER FOR AT LEAST 15 FIRST AID: MINUTES AND GET MEDICAL ATTENTION: FOR SKIN. WASH THOROUGHLY WITH SOAP AND WATER. IF AFFECTED BY INHALATION OF VAPOR OR SPRAY MIST, REMOVE TO FRESH AIR. IF SWALLOWED. GET MEDICAL ATTENTION IMMEDIATELY.

SE OF SPILLAGE, ABSORD WITH INERT MATERIAL AND DISPOSE OF IN ACCORDANCE Ĩ WITH APPLICABLE REGULATIONS.

REPORTS HAVE ASSOCIATED REPEATED AND PROLONGED OCCUPATIONAL NOTICE: OVEREXPOSURE TO SOLVENTS WITH PERMANENT BRAIN AND NERVOUS SYSTEM DAMAGE. INTENTIONAL MISUSE BY DELIBERATELY CONCENTRATING AND INHALING THE CONTENTS MAY **BE HARMFUL OR FATAL.**

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NFORMATION CONTAINED HEREIN IS BASED ON DATA BELIEVED TO BE RELIABLE BY T. ... JSMAN PRODUCTS: IT IS TRUE AND ACCURATE TO THE BEST OF OUR KNOWLEDGE, BUT IS NOT INTENDED TO BE ALL INCLUSIVE. USERS SHOULD CONSIDER THIS INFORMATION AS A SUPPLEMENT TO OTHER INFORMATION GATHERED BY THEM AND MIST MAKE THEIR OWN DETERMINATION OF SUITABILITY AND COMPLETENESS TO ASSURE PROPER SAFE USE AND DISPOSAL OF THESE MATERIALS. 4.2.5-39

GUARDSMAI	N Mit Cte		16 90	al/sam	0	 -	
Guardsman Products.	Inc.	MAT	ERIAL S	AFETY D	ATA SHEET	Ŧ	
AT OF PREPARATION:	04/30/94			CHERCEN			
ACTURERS NAME:	GUARDSMAN PROD	UCTS, INC	•	PHONE N	$0 \cdot = (2)$	5)772-6	550
ANUFACTURERS ADDRESS:	13535 MONSTER SEATTLE, WA 9	RJAD 8178	•	24-HƏJR Phəne:	EMERGEN(Chemtred	CY RESP BJD-42 PAGE	ONSE 4-9300 1 OF 4
	SECTION I:	PRODUCT	INFORM	ATION	==========		112 2223
RODUCT NAME: DRIFTWOO ANUFACTURERS CODE IDEN RODUCT CLASS: PIGMENT	D CONC TIFICATION: 52 STAIN SECTION II:	8-5002 ======== HAZARDOU	REAC	HEALTH: TIVITY: ====== DIENTS	HMIS RAT 2 FL/ 0 PERS	TING AMMABIL S. PROT	ITY: 3 ECT: _
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ITANIUM DIOXIDE (13463	-67-7)	61	10	15		MG/M3	

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EY TO ABBREV +: SK: NE: OTHER:	IATIONS US SARA III - TOXIC EFFE NOT ESTABL RECOMMENDE	ED: SECTION 313 CTS CAN OCCUS ISHED D TLV	TOXIC CHEM Sy skin af Ci S	ICAL BSORPTION E: Ceiling i T: Short tei	LIMIT RM EXPOSURE L	IMIT
		SECTION		ICAL DATA		
VAPORATION R APOR DENSITY DILING RANGE	ATE: : X : 230 TO	FASTER X HEAVIER 295 DES F	SLOWER LIGHTER PRODUCT	THAN ETHER THAN AIR V.O.C.: 3	.35 L3/GAL (4.2.5-40 432 G/L)

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Guardsman Products, Inc. PRODUCT: 528-5002 1 PAGE 2 DF 4 SECTION IV: FIRE AND EXPLOSION HAZARD DATA AMABILITY CLASSIFICATION: FLAMMABLE LIQUID CLASS IB OWER EXPLOSIVE LIMIT: 1.00 45 DEG F LASH POINT: METHOD USED: TCC XTINGUISHING MEDIA: FOAM. CARBON DIOXIDE OR DRY CHEMICAL. WATER FOG MAY LESSEN FIRE INTENSITY. INUSUAL FIRE AND EXPLOSION HAZARDS: KEEP CONTAINERS TIGHTLY CLOSED. ISOLATE FROM HEAT, ELECTRICAL EQUIPMENT. SPARKS AND OPEN FLAME. CLOSED CONTAINERS HAY EXPLODE WHEN EXPOSED TO EXTREME HEAT. VAPORS ARE HEAVIER THAN AIR AND MAY TRAVEL ALONG THE GROUND, COLLECT IN LOW AREAS, OR MAY IGNITE AT DISTANT LOCATIONS. DO NOT WELD ON OR NEAR CONTAINER, EVEN WHEN EMPTY. PECIAL FIRE FIGHTING PROCEDURES: DURING EMERGENCY CONDITIONS, DECOMPOSITION PRODUCTS CAN CAUSE HEALTH HAZARD. USE SELF-CONTAINED BREATHING APPARATUS WITH FULL FACE SHIELD OPERATED IN PRESSURE DEMAND OR OTHER POSITIVE PRESSURE MODE. SECTION V: HEALTH HAZARD DATA FFECTS OF OVEREXPOSURE: SEE FURTHER PRECAUTION STATEMENTS ON LABEL (PAGE 4). CUTE AND CHRONIC HEALTH EFFECTS: EYES: CAN CAUSE IRRITATION, REDNESS, TEARING, BLURRED VISION. "IN: PROLONGED OR REPEATED CONTACT CAN CAUSE IRRITATION, DEFATTING, RMATITIS. INHALATION: EXCESSIVE INHALATION OF VAPORS CAN CAUSE RESPIRATORY IRRITATIL DIZZINESS, HEADACHE, NAUSEA AND ASPHYKIATION. INGESTION: SWALLOWING CAN CAUSE GASTROINTESTINAL IRRITATION, NAUSEA, VOMITING, DIARRHEA, ASPIRATION OF MATERIAL INTO LUNGS CAN CAUSE CHEMICAL PNEUMONITIS WHICH CAN BE FATAL.)THER HEALTH EFFECTS: REPORTS HAVE ASSOCIATED REPEATED AND PROLONGED DCCUPATIONAL OVEREXPOSURE TO SOLVENTS WITH PERMANENT BRAIN AND NERVOUS SYSTEM DAMAGE. MERGENCY FIRST AID PROCEDURES: EYES: FLUSH WITH LARGE QUANTITIES OF WATER FOR AT LEAST 15 MINUTES AND GET MEDICAL ATTENTION. SKIN: WASH AFFECTED AREAS WITH SDAP AND WATER. REMOVE CONTAMINATED CLOTHING. CONSULT A PHYSICIAN IF IRRITATION PERSISTS. INHALATION: REMOVE TO FRESH AIR. RESTORE BREATHING. TREAT SYMPTOMATICALLY. GET MEDICAL ATTENTION. INGESTION: OBTAIN IMMEDIATE MEDICAL ASSISTANCE TO DETERMINE BEST EMERGENCY TREATMENT. SECTION VI: REACTIVITY DATA -----TABILITY: UNSTABLE X STABLE HAZARDOUS POLYMERIZATION: MAY OCCUR X WILL NOT OCCUR HAZARDOUS DECOMPOSITION PRODUCTS: IN CASE OF THERMAL DECOMPOSITION, CARBON DIOXIDE AND CARBON MONOXIDE WILL FARM. TIONS TO AVOID: , VOID HIGH TEMPERATURES, DIRECT HEATING. NCOMPATIBILITY (MATERIALS TO AVOID): 4.2.5-41 AVOID CONTACT WITH STRONG DXIDIZING AGENTS.

1 Guardsman Products, Inc.	PRODJCT: 528-5002 PAGE 3 OF
SECTION VII: SPILL OR	LEAK PRICEDURES
TO BE TAKEN IN CASE MATERIAL IS RELEAS ELIMINATE ALL SOURCES OF IGNITION. CONTA MATERIAL SUCH AS SAND. SHOVEL INTO DRUMS NON-SPARKING TOOLS. NOTIFY APPROPRIATE AU	ED OR SPILLED: IN SPILL AND ABSORD WITH ABSORBANT OR OTHER SUITABLE CONTAINERS USING THORITIES IF SPILL ENTERS ENVIRONMENT
ASTE DISPOSAL METHOD: INCINERATE IN AN APPROVED FACILITY 32 DIS STATE AND LOCAL REGULATIONS. DO NOT INCI	POSE OF IN ACCORDANCE WITH FEDERAL. NERATE CLOSED CONTAINERS.
SECTION VIII: SPECIAL PRO	TECTION INFORMATION
RESPIRATORY PROTECTION: IF TLV OF ANY COMPONENT IS EXCEEDED, USE RESPIRATOR. FOLLOW RESPIRATOR MANUFACTUR /ENTILATION: PROVIDE SUFFICIENT MECHANICAL AND/OR LOCA LEVELS BELOW THE TLV. APPLICATION AREAS WITH OSHA REGULATION #29CFR1910.107D. PROTECTIVE GLOVES: USE NEOPRENE, RUBBER OR PLASTIC GLOVES TO EYE PROTECTION:	AN APPROPRIATE NIOSH/MSHA APPROVED ER'S DIRECTIONS FOR RESPIRATOR USE. L VENTILATION TO MAINTAIN EXPOSURE SHOULD BE VENTILATED IN ACCORDANCE PREVENT SKIN CONTACT.
USE SAFETY GLASSES WITH SIDE SHIELDS. DTHER PROTECTIVE EQUIPMENT: SAFETY SHOWERS AND EYE BATH.	
SECTION IX: SPECI	AL PRECAJTIONS
PR. UTIONS TO BE TAKEN IN HANDLING AND STOR KEEP AWAY FROM EXCESSIVE HEAT, SPARKS, AN WHEN NOT IN USE. KEEP CONTAINERS UPRIGHT	ING: ID OPEN FLAME. KEEP CLOSURES TIGHT TO PREVENT LEAKAGE.
DTHER PRECAUTIONS: CONTAINERS OF THIS MATERIAL MAY BE HAZARO CONTAINERS RETAIN RESIDUES, ALL HAZARO PR DO NOT CUT, PUNCTURE OR WELD ON OR NEAR C CONTAINERS OF THIS MATERIAL MUST BE PROPE IF CONTENTS ARE COMBINED WITH OTHER MATER ETC, OBSERVE ALL PRECAUTIONS. WHEN SPRAYING THIS MATERIAL, KEEP SPRAY E SPRAY DUST OR OVERSPRAY IN BOOTH OR DUCTS	DUS WHEN EMPTIED. SINCE EMPTY ECAUTIONS MUST BE BBSERVED. ONTAINER. RLY GROUNDED WHEN POURING. HALS SUCH AS THINNERS, CATALYSTS, BOOTH CLEAN. AVOID BUILDUP OF

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Guardsman Products, Inc. PRODJCT: 528-5002 1 PAGE 4 NF 4 SECTION SHIPPING AND LABEL INFORMATION X: ----SHIPPING NAME: PAINT Ê. DOT ID ND: UN1263 DOT HAZARD CLASS: 3 PG: 11

PRECAUTIONARY LABEL STATEMENT: 06208

WARNING! FLAMMABLE. HARMFJL IF INHALED. MAY AFFECT THE BRAIN OR NERVOUS SYSTEM CAUSING DIZZINESS, HEADACHE DR NAUSEA. CAUSES EYE, SKIN, NDSE AND THROAT IRRITATION.

CONTAINS ORGANIC SOLVENTS. KEEP AWAY FROM HEAT, SPARKS AND FLAME. VAPORS MAY CAUSE FLASH FIRE. CLOSE CONTAINER AFTER EACH USE. USE WITH ADEQUATE VENTILATION. DO NOT BREATHE VAPORS OR SPRAY MIST. JEAR AN APPROPRIATE, PROPERLY FITTED RESPIRATOR (NIOSH/MSHA APPROVED) DURING AND AFTER APPLICATION UNTIL FUMES ARE GONE, UNLESS AIR MONITORING DEMONSTRATES VAPOR/MIST LEVELS ARE BELOW APPLICABLE LIMITS. FOLLOW RESPIRATOR MANUFACTURER'S DIRECTIONS FOR RESPIRATOR USE. AVOID CONTACT WITH EYES, SKIN AND CLOTHING. WASH THOROUGHLY AFTER HANDLING.

FIRST AID: IN CASE OF EYE CONTACT, FLUSH WITH PLENTY OF WATER FOR AT LEAST 15 MINUTES AND GET MEDICAL ATTENTION; FOR SKIN, WASH THOROUGHLY WITH SDAP AND WATER. IF AFFECTED BY INHALATION OF VAPOR OR SPRAY MIST, REMOVE TO FRESH AIR. IF SWALLOWED, GET MEDICAL ATTENTION IMMEDIATELY.

I VSE OF SPILLAGE, ABSORB WITH INERT MATERIAL AND DISPOSE OF IN ACCORDANCE WITH APPLICABLE REGULATIONS.

NOTICE: REPORTS HAVE ASSOCIATED REPEATED AND PROLONGED OCCUPATIONAL OVEREXPOSURE TO SOLVENTS WITH PERMANENT BRAIN AND NERVOUS SYSTEM DAMAGE. INTENTIONAL MISUSE BY DELIBERATELY CONCENTRATING AND INHALING THE CONTENTS MAY BE HARMFUL OR FATAL.

T INFORMATION CONTAINED HEREIN IS BASED ON DATA BELIEVED TO BE RELIABLE BY JUNCE STARN PRODUCTS: IT IS TRUE AND ACCURATE TO THE BEST OF OUR KNOWLEDGE, BUT IS NOT INTENDED TO BE ALL INCLUSIVE. USERS SHOULD CONSIDER THIS INFORMATION AS A SUPPLEMENT TO OTHER INFORMATION GATHERED BY THEM AND MUST MAKE THEIR OWN DETERMINATION OF SUITABILITY AND COMPLETENESS TO ASSURE PROPER SAFE USE AND DISPOSAL OF THESE MATERIALS. 4.2.5-43

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Guardsman Products, Inc.	м	ATERIAL	SAFETY DA	TA SHE	ET	
LE OF PREPARATION: 01/21/94						·
NUFACTURERS NAME: GUARDSMAN PI	RODUCTS, I	NC.	PHONE NO	Y/INFO	RMATION 36)772-6	550
MANUFACTURERS ADDRESS: 13535 MONST SEATTLE: WA	ER RDAD 98178		24-HOUR PHONE: C	EMERGE Hemtre	NCY: RESP 800-42 PAGE	ONSE 1 0F 4
SECTION	I: PRODU	CT INFOR	MATION			
PRODUCT NAME: RM VANGUARD CON/VAR MANUFACTURERS CODE IDENTIFICATION: PRODUCT CLASS: CLEAR COATING	531-1000-	80 REA	HEALTH: TIVITY:	HMIS R *2 Fi 0 PE	ATING LAMMABIL RS. PRDT	.ITY: 3 'ECT: _
SECTION I	I: HAZARD	OUS INGR	EDIENTS			
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+XYLENE (1330-20-7) ETHYL ALCOHOL (64-17-5) +METHYL ALCOHOL (67-56-1) +BUTYL ALCOHOL (71-36-3) +METHYL ETHYL KETONE (78-93-3) +METHYL ISOBUTYL KETONE (108-10-1) PROPYLENE GLYCOL MONOMETHYL THER ACETATE(108-65-6) DLUENE (108-88-3) DBUTYL ALCOHOL (78-83-1) +FORMALDEHYDE (50-00-6)	2 9 2 11 13 22 4 2 1 TRACE	100 200-5K 50-5K 200 50 NE 50-5K 50 0.3-CE	100 1000 200-SK 50-SK 200 50 NE 100 50 0.75	NE	РРМ РРМ РРМ РРМ РРМ РРМ РРМ	6.60 47.00 96.00 4.00 70.00 15.00 1.5.00 1.80 22.00 8.80

KEY TO ABBRE +: SK: NE: DTHER:	VIATIONS USE SARA III - TOXIC EFFEC NOT ESTABLI RECOMMENDED	D: SECTION 313 T TS CAN OCCUR SHED TLV	DXIC CHEMICAL By Skin Absor Ce:	RPTION CEILING LIMI	Т	
		SECTION I	II: PHYSICA			
'APORATION .APOR DENSIT BOILING RANG PERCENT VOLA	RATE: Y: X E: 148 TO 2 TILE BY VOLU	FASTER X HEAVIER 195 DEG F IME: 75	SLOWER TH LIGHTER TH PRODUCT V.U WEIGHT PER	AN ETHER HAN AIR D.C.: 5.09 GALLON:	LB/GAL (61 7.53 PDUNDS	1 G/L)

1	Guardsman	Products,	inc.	=====			PRODU	CT:	531-1	000-8	30	PAGE	2 DF /
		SECT	ION	IV:	FIRE #	ND E	XPLOS	IDN H	HAZARD	DATA	·		<u> </u>
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1 Guardsman Products, Inc. INCOMPATIBILITY (MATERIALS TO AVOID): AVOID CONTACT WITH STRONG OXIDIZING AGEN	PRODUCT: TS.	531-1000-80	PAGE	3 OF
SECTION VII: SPILL O	R LEAK PRO			
STEPS TO BE TAKEN IN CASE MATERIAL IS RELEA ELIMINATE ALL SOURCES OF IGNITION. CONT MATERIAL SUCH AS SAND. SHOVEL INTO DRUM NON-SPARKING TOOLS. NOTIFY APPROPRIATE A WASTE DISPOSAL METHOD: INCINERATE IN AN APPROVED FACILITY OR DI STATE AND LOCAL REGULATIONS. DO NOT INC SECTION VIII: SPECIAL PR	SED OR SPI AIN SPILL S OR JTHER UTHORITIES SPOSE OF I INERATE CL	LLED: AND ABSORB WITH SUITABLE CONTAI IF SPILL ENTERS N ACCORDANCE WIT DSED CONTAINERS. HORMATIDN	ABSORB NERS U ENVIR H FEDEI	ANT SING ONMENT RAL ,
RESPIRATORY PROTECTION: IF TLV OF ANY COMPONENT IS EXCEEDED, USE RESPIRATOR. FOLLOW RESPIRATOR MANUFACTU VENTILATION: PROVIDE SUFFICIENT MECHANICAL AND/OR LOC LEVELS BELOW THE TLV. APPLICATION AREAS WITH OSHA REGULATION #29CFR1910.107D. PROTECTIVE GLOVES:	AN APPROP RER'S DIRE AL VENTILA SHOULO BE	RIATE NIDSH/MSHA CTIONS FOR RESPI TION TO MAINTAIN VENTILATED IN A	APPRD RATOR EXPOSI CCORDA	VED USE. URE NCE
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1	Guardsman Pro	ducts, Inc.			PRC	DDUCT:	531-100	0-80	PAGE	40	F	4
		SECTION	X =	SHIPPING	AND	LABEL	INFORMAT	IDN	:= 328282:	====		=
J. SH	IPPING NAME:	PAINT								•	- 10 - 10 - 10 - 10 - 10 - 10 - 10 - 10	-

DOT ID NO: UN1263 DOT HAZARD CLASS: 3 Pu- II

PRECAUTIONARY LABEL STATEMENT: 05508

WARNING! FLAMMABLE. HARMFUL IF INHALED. MAY AFFECT THE BRAIN OR NERVOUS SYSTEM CAUSING DIZZINESS, HEADACHE DR NAUSEA. CAUSES EYE, SKIN, NOSE, THROAT AND LUNG IRRITATION. MAY BE HARMFUL IF ABSORBED THROUGH SKIN.

CONTAINS ORGANIC SOLVENTS. KEEP AWAY FROM HEAT, SPARKS AND FLAME. VAPORS MAY CAUSE FLASH FIRE. CLOSE CONTAINER AFTER EACH USE. USE WITH ADEQUATE VENTILATION. DO NOT BREATHE VAPORS OR SPRAY MIST. WEAR AN APPROPRIATE, PROPERLY FITTED RESPIRATOR (NIDSH/MSHA APPROVED) DURING AND AFTER APPLICATION UNTIL FUMES ARE GONE, UNLESS AIR MONITORING DEMONSTRATES VAPOR/MIST LEVELS ARE BELOW APPLICABLE LIMITS. FOLLOW RESPIRATOR MANUFACTURER'S DIRECTIONS FOR RESPIRATOR USE. AVOID CONTACT WITH EYES, SKIN AND CLOTHING. WASH THOROUGHLY AFTER HANDLING.

FIRST AID: IN CASE OF EYE CONTACT, FLUSH WITH PLENTY OF WATER FOR AT LEAST 15 MINUTES AND GET MEDICAL ATTENTION; FOR SKIN, WASH THOROUGHLY WITH SOAP AND WATER. IF AFFECTED BY INHALATION OF VAPOR OR SPRAY MIST, REMOVE TO FRESH AIR. IF SWALLOWED, GET MEDICAL ATTENTION IMMEDIATELY.

NOTICE: REPORTS HAVE ASSOCIATED REPEATED AND PROLONGED OCCUPATIONAL OVEREXPOSURE TO SOLVENTS WITH PERMANENT BRAIN AND NERVOUS SYSTEM DAMAGE. INTENTIONAL MISUSE BY DELIBERATELY CONCENTRATING AND INHALING THE CONTENTS MAY BE HARMFUL OR FATAL. POTENTIAL CANCER HAZARD. CONTAINS FORMALDEHYDE WHICH CAN CAUSE SENSITIZATION. RISK OF CANCER DEPENDS ON DURATION AND LEVEL OF EXPOSURE.

THE INFORMATION CONTAINED HEREIN IS BASED ON DATA BELIEVED TO BE RELIABLE BY G. OSMAN PRODUCTS: IT IS TRUE AND ACCURATE TO THE BEST OF OUR KNOWLEDGE, BUT IS NOT INTENDED TO BE ALL INCLUSIVE. USERS SHOULD CONSIDER THIS INFORMATION AS SUPPLEMENT TO OTHER INFORMATION GATHERED BY THEM AND MUST MAKE THEIR OWN ETERMINATION OF SUITABILITY AND COMPLETENESS TO ASSURE PROPER SAFE USE AND DISPOSAL OF THESE MATERIALS.

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Guardsman Products,	Inc.	ų	ATERIAL S	AFETY DA	TA SHEET		
F PREPARATION:	34/23/94		· .	ENEDCENC			
ACTURERS NAME:	GUARDSMAN PRO	DUCTS, I	NC.	PHONE NO	•= (206	5)772-6	550
ANUFACTURERS ADDRESS:	13535 MONSTER SEATTLE, WA	RDAD 93173		24-HOUR PHONE: J	EMERGENO Hemtred	Y RESP BDD-42 PAGE	ONSE 4-9300 1 DF 4
	SECTION I	: PRODU	CT INFORM	ATION		======	======
RODUCT NAME: RM VANGU ANUFACTURERS CODE IDEN RODUCT CLASS: LACQUER	ARD SEALER TIFICATION: 5 CDATING	79-6004	REAC	HEALTH: TIVITY:	HMIS RAT *3 FLA 0 PERS	ING MMABIL S. PRJT	ITY: 3 ECT: _
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INGREDIENT/(CAS		₩3T.	2000PA1	TIONAL EX	POSURE L OTHER	IMITS JNITS	VAPOF PRES. MM HG
XYLENE (1330-20-7) TOLUENE (103-38-3) METHYL ALCOHOL (67-56- THYL ALCOHOL (64-17-5) BUTYL ALCOHOL (71-36-3 UTYL ACETATE (123-86-4 M1 L STHYL KETONE (7 L ISOBUTYL KETONE AUSPIRITO (3030-30	1)) 8-93-3) (108-13-1 -5*)	4 12 9 5 3 5 1 2	100 50-SK 200-SK 1000 50-SK 150 200 50 82	100 200 200-SK 1000 100 150 200 150 200 150	150-ST 250-ST 200-ST 300-ST 75-ST 100	РРМ РРМ РРМ РРМ РРМ РРМ РОМ 2 РЧ 2 РЧ	6.6° 22.07 96.00 47.00 10.00 70.07 15.77 43.77
FOPMALDEHYDE (50-00-0)	*	2•4	3-CE	2.75	2-ST	P P 9	

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EY, TO ABORT	VIATIÓNS.	USED:					
+ :	SARA III	- SECTION 3	13 FOXIC (HEMICAL			
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Guardsman Products, Inc. PRODUCT: 579-6004 PAGE 2 0F 4 31 SECTION IV: FIRE AND EXPLOSION HAZARD DATA AMABILITY CLASSIFICATION: FLAMMABLE LIQUID CLASS IB Ξ, OWER EXPLOSIVE LIMIT: 0.90 FLASH POINT: 20 DEG F METHOD USED: TOD EXTINGUISHING MEDIA: FOAM. CARBON DIOXIDE OR DRY CHEMICAL. WATER FOG MAY LESSEN FIRE INTENSITY. INUSUAL FIRE AND EXPLOSION HAZARDS: KEEP CONTAINERS TIGHTLY CLOSED. ISOLATE FROM HEAT, ELECTRICAL EQUIPMENT, SPARKS AND OPEN FLAME. CLOSED CONTAINERS MAY EXPLODE WHEN EXPOSED TO EXTREME HEAT. VAPORS ARE HEAVIER THAN AIR AND MAY TRAVEL ALONG THE GROUND, COLLECT IN LOW AREAS, OR MAY IGNITE AT DISTANT LOCATIONS. DO NOT WELD ON DR NEAR CONTAINER, EVEN WHEN EMPTY. SPECIAL FIRE FIGHTING PROCEDURES: DURING EMERGENCY CONDITIONS, DECOMPOSITION PRODUCTS CAN CAUSE HEALTH HAZARD. USE SELF-CONTAINED BREATHING APPARATUS WITH FULL FACE SHIELD OPERATED IN PRESSURE DEMAND OR OTHER POSITIVE PRESSURE MODE. SECTION V: HEALTH HAZARD DATA _____ FFECTS OF OVEREXPOSURE: SEE FURTHER PRECAUTION STATEMENTS ON LABEL (PAGE 4). CUTE AND CHRONIC HEALTH EFFECTS: INGESTION: SWALLOWING CAUSES INEBRIATION, HEADACHE, VOMITING, LEADING TO VERT ILLNESS, BLINDNESS, EVEN DEATH. 155: CAN CAUSE EYE BURNS. BLURRED VISION. SKIN: LIQUID CAUSES IRRITATION. PROLONGED DR REPEATED CONTACT CAN CAUSE DEFATTING LEADING TO DERMATITIS. INHALATION: EXCESSIVE INHALATION OF VAPORS CAN CAUSE RESPIRATORY IRRITATION. DIZZINESS, HEADACHE, VOMITING, UNDENSCIDUSNESS. THER HEALTH EFFECTS: REPORTS HAVE ASSOCIATED REPEATED AND PROLONGED OVEREXPOSURE TO SOLVENTS WITH PREMANENT BRAIN AND NERVOUS SYSTEM DAMAGE. FORMALOSHYDE IS A POTENTIAL CANCER HAZARD MASED ON TESTS ON LABORATORY. ANIMALS, AND CAN CAUSE SENSITIZATION. TMERGENCY FIRST AID PROCEDURES: INGESTIGH: RINSE MOUTH. GIVE 1 TO 2 GLASSES OF WATER. CALL 4 PHYSICIAN FOR WAY TO INDUCE VOMITING. NEVER GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON. EYES: FLUSH WITH PLENTY OF WATER FOR 18 MINUTES. GET MEDICAL ATTENTION. SKIN: WASH AFFECTED AREA WITH SDAP IND WATER. REMOVE CONTAMINATED CLOTHING. CONSULT & PHYSICIAN IF IRRITATION PERSISTS. INHALATION: REMOVE TO FRESH AIR. RESTORE GREATHING. TREAT SYMPTOMATICALLY. GET MEDICAL ATTENTION. SECTION VI: REACTIVITY DATA -______ STABILITY: UNSTABLE X STABLE HAZARODUS POLYMERIZATION: MAY CODUR & WILL NOT DOCUR KAZARDOUC DECOMPOSITION PRODUCTS: TH GASI OF THERMAL OFCOMPOSITION, CARBON DICKIOD AND/CARBON MONOXIOF WILL 🚟 🕅. CIOVA CT SUCIT AVOID HIGH TEMPERATURES, DIRECT HEATING. INCOMPATIBILITY (MATERIALS TO AVEID): 4.2.5-49 AVAID CONTACT WITH STRONG OXIDIZING AGERIS.

31	Guardsman Products, Ir	10.	PRODUCT:	579-6004	PAGE 3 DF 4
======	SECI	TION VII: SPILL DR	R LEAK PRIC	EDURES	
ELI MAT NON ASTE INC	TO BE TAKEN IN CASE MINATE ALL SOURCES ERIAL SUCH AS SAND -SPARKING TOOLS. NO DISPOSAL METHOD: INERATE IN AN APPRO	E MATERIAL IS RELEAS OF IGNITION. JONTA SHOVEL INTO DRUMS DTIFY APPROPRIATE AU OVED FACILITY OF DIS ATIONS. DO NOT INCL	SED OR SPIL AIN SPILL A S OR DIHER JTHORITIES SPOSE OF IN	LED: ND ABSORB WITH A SUITABLE CONTAIN IF SPILL ENTERS ACCORDANCE WITH SED CONTAINERS.	ABSORBANT NERS JSING ENVIRONMENT. H FEDERAL,
=====		VIII: SPECIAL PRO	DTECTION IN	IFORMATION	
ESPIR IF RES ENTIL PRO LEV WIT ROTEC VE PR USE THER	ATORY PROTECTION: TLV OF ANY COMPONEN PIRATOR. FOLLOW RE ATION: VIDE SUFFICIENT MEC ELS BELOW THE TLV. H OSHA REGULATION & TIVE GLOVES: NEOPRENE, RUBBER O OTECTION: SAFETY GLASSES WIT PROTECTIVE EQUIPMEN	AT IS EXCEEDED. JSE SPIRATOR MANUFLOTUR APPLICATION AREAS #29CFR1910.107D. OR PLASTIC GLOVES TO TH SIDE SHIELDS.	4N APPROPR RERIS DIRES AL VENTILAT SHOULD BE D PREVENT S	IATE NIDSH/MSHA TIDNS FOR RESPIR TON TO MAINTAIN VENTILATED IN AC SKIN CONTACT.	APPROVED ATOP USE. Exposure Cordance
SAF	ETY SHOWERS AND EYS	E BATH AND APRON.			•
SAF	ETY SHOWERS AND EYS	E BATH AND APRON. Section IX: Speci	AL PRESAUT	I DNS	
SAF SAF SAF SAF SAF SAF SAF SAF	ETY SHOWERS AND EYE TIDNS TO BE TAKEN TO P 4WAY FROM EXCESS N NOT IN USE. KEEP PRECAUTIONS: TAINERS OF THIS MAT TAINERS OF THIS MAT TAINERS OF THIS MAT CONTENTS ARE COMBIN OBSERVE ALL PRECA N SPRAYING THIS MAT AY DUST DR OVERSPRA	E BATH AND APRON. SECTION IX: DPEC IM HANDLING AND STOP IVE HEAT, SPARKS, AN P CONTAINERS UPRIGHT TERIAL MAY BE HAZARD DR WELD DW DR NEAR (TERIAL MUST BE PROP NED WITH OTHER MATTE AUTIONS. TERIAL, KEEP SPRAY D	AL PRECAUT NO OPEN FLA TO PREVEN COUS WHEN T RECAUTIONS CONTAINER. ERLY GROUND RIALS SUCH SOOTH CLEAN	IDNS ME. KEEP CLOSJE IT _EAKAGE. MPTIED. SINCE E HUST BE DBSERVER AS THINNERS, CAT A. AVOID BUILDJE	RES TIGHT
SAF SAF SAF SAF SAF SAF SAF SAF	ETY SHOWERS AND EYE TIDNS TO BE TAKEN TO P 4WAY FROM EXCESS N NOT IN USE. KEEP PRECAUTIONS: TAINERS OF THIS MAT TAINERS OF THIS MAT TAINERS OF THIS MAT CONTENTS ARE COMBIN , OBSERVE ALL PRECONDING N SPRAYING THIS MAT AY OUST OR OVERSPRAN D	E BATH AND APRON. SECTION IX: DPEC IM HANDLING AND STOP IVE HEAT, SPARKS, AND CONTAINERS UPRIGHT TERIAL MAY BE HAZARD IDUES, ALL HAZARD DR WELD ON DR NEAR OF TERIAL MUST BE PROPE NED WITH OTHER MATTE AUTIONS. TERIAL, KEEP SPRAY AY IN BODTH OR DUCT ANGER: CONTAINS MET CANNOT BE MADE NOT VAPOR HARM	AL PRECAUT AL PRECAUT AD OPEN FLA TO PREVEN DOUS WHEN T ACCAUTIONS CONTAINER. BRLY GROUND RIALS SUCH SOOTH CLEAN S. THANDL - PI N-POISONOUS FUL INDNESS IF	IDNS IDNS IT LEAKAGE. MPTIED. SINCE E HUST BE DBSERVER OED WHEN POURING. AS THINNERS. CAN N. AVOID BUILDUP CISON SWALLOWED	ES TIGHT MPTY TALYSTS.
SAF SAF SAF SAF SAF SAF SAF SAF	ETY SHOWERS AND EYE TIDNS TO BE TAKEN TO P 4WAY FROM EXCESS N NOT IN USE. KEEP PRECAUTIONS: TAINERS OF THIS MAY TAINERS OF THIS MAY TAINERS OF THIS MAY CONTENTS ARE COMBIN OBSERVE ALL PRECA N SPRAYING THIS MAY AY OUST OR OVERSPRAN DATA MAY B	E BATH AND APRON. SECTION IX: DPEC IM HANDLING AND STOR IVE HEAT, SPARKS, AND P CONTAINERS UPRIGHT TERIAL MAY BE HAZARD IDUES, ALL HAZARD PR OR WELD DN DR NEAR OF TERIAL MUST BE PROPE NED WITH OTHER MATTR AUTIONS. TERIAL, KEEP SPRAY AY IN BODTH DR DUCT ANGER: CONTAINS MET CANNOT BE MADE NOT VAPOR HARM S FATAL DR CAUSE BL FOP INDUSTRIAL U	AL PRECAUT VING: VD OPEN FLA T TO PREVEN COUS WHEN T CONTAINER. ERLY GROUND RIALS SUCH SODTH CLEAN N-POISONOUS FUL INDNESS IF SF ONLY	IDNS ME. KEEP CLDSJA MT LEAKAGE. MPTIED. SINCE E HUST BE DBSERVER DED WHEN POURING. AS THINNERS. CAT N. AVDID BUILDJA SWALLOWED	RES TIGHT

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<u>[</u> ۲	Guardsman Pro	ducts, Inc.			2800	DUCT:	579-6004	PAGE	4 OF 4
		SECTION X	SHIP	PENG	AND L	ABEL	INFORMATION	N	
-),)0T	SHIPPING NAME: ID ND: UN1263	PAINT		דככ	HAZARE	D CLAS	SS: 3		PG: II
PREC	AUTIONARY LABEL	STATEMENT:	01564						

DANGER! EXTREMELY FLAMMABLE. VAPORS MAY CAUSE FLASH FIRE. HARMFUL IF INHALED. MAY AFFECT THE BRAIN OR NERVOUS SYSTEM CAUSING DIZZINESS, HEADACHE OR NAUSEA. MAY BE FATAL OR CAUSE BLINDNESS IF SWALLOWED. CAUSES EYE, SKIN, NOSE, THROAT AND LUNG IRRITATION. MAY BE HARMFUL IF ABSORBED THROUGH SKIN.

CONTAINS ORGANIC SOLVENTS AND METHANDL. KEEP AWAY FROM HEAT, SPARKS AND FLAME. VAPORS CAN TRAVEL LONG DISTANCES AND MAY IGNITE EXPLOSIVELY. CLOSE CONTAINER 1FTER EACH USE. USE WITH ADEQUATE VENTILATION. DO NOT BREATHE VAPORS OR SPRAY WEAR ANYAPPROPRIATE, PROPERLY FITTED RESPIRATOR (NIOSH/MSHA APPROVED) IIST. DURING AND AFTER APPLICATION UNTIL FUMES ARE GONE, UNLESS AIR MONITORING DEMONSTRATES VAPOR/MIST LEVELS ARE BELOW APPLICABLE LIMITS. FOLLOW RESPIRATOR HANUFACTURER'S DIRECTIONS FOR RESPIRATOR USE. AVOID CONTACT WITH EYES, SKIN AND CLOTHING. WASH THOROUGHLY AFTER HANDLING.

FIRST AID: IN CASE OF CONTACT, IMMEDIATELY FLUSH EYES OR SKIN WITH PLENTY OF VATTR FOR AT LEAST 15 MINUTES WHILE REMOVING CONTAMINATED CLOTHING AND SHOES. REDICAL ATTENTION. THOROUGHLY CLEAN CONTAMINATED CLOTHING AND SHOES BEEC TRUSE. IN CASE OF EVE CONTACT, FLUSH WITH PLENTY DE WATER FOR AT LEAST. 5 TINUTES AND SHT MEDICAL ATTENTION; FOR SKIN, WASH THOROUGHLY WITH SDAP AND VATER. IF AFFECTED BY INHALATION OF VAPOR OR SPRAY MIST, REMOVE TO FRESH 410. TE SWALLDWED, INDUCE VOMITING IMMEDIATELY AS DIRECTED BY MEDICAL PERSONNEL. TEVER GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON. IF SWALLOWED, SET STDICAL ATTENTION IMMEDIATELY.

IN CASE DE SØILLAGE, ABSORB WITH INGRI MATERIAL AND DISPOSE DE IN ACCORDANCES VITH APPLICABLE REGULATIONS.

UNTICE: REPORTS HAVE ASSOCIATED REPEATED AND PROLONGED DECUPATIONALS IVEREXPOSURE TO SOLVENTS WITH PERMANENT DRAIN AND NERVOUS SYSTEM DAMAGE. INTENTIONAL MISUSE BY DELIBERATILY CONCENTRATING AND INHALING THE CONTENTS MAY TH HARMFUL TR MATAL. POTENTIAL CANCER HAZARD. CONTAINS FORMALDEHYDE WHICH CAN INUSE GENERATION. RISK OF CANCER GEPENDS ON DURATION AND LEVEL OF EXPOSURE. CONTAINS MITHANOL AND CANNOT BE MADE NONPOISDNOUS. INHALING THE CONTENTS MAY HARMFUL OR FATAL.

- MERRMATION CONTAINED HERTIM II-34810 DV DATA RAEIEVED II 3E FELIADLE DV -WAM PRODUCTS; IT IS TRUE AND ADOURATE TO THE BEST OF OUR KNOWLEDGE, BUD 3 NOT INTENDED TO BE ALL INCLUSIVE. USERS SHOULD CONSIDER THIS INFORMATION 42 V SUPPLEMENT TO OTHER INFORMATION GATHERED BY THEM AND MUST MAKE THEIR OWN. FIFRMIMATIONS OF SUITABILITY AND CLMPLITENESS TO ASSURE PROPER SAFE USE AND ISPOSAL OF THESE MATERIALS.



DEPARTMENT OF ENVIRONMENTAL QUALITY **DIVISION OF AIR QUALITY**

Michael O. Leavitt Governor Dianne R. Nielson, Ph.D. Executive Director Russell A. Roberts Director December 22, 1994

150 North 1950 West P.O. Box 144820 Sait Lake City, Utah 84114-4820 (801) 536-4000 (801) 536-4099 Fax (801) 538-4414 T.D.D.

DAQE-1093-94

Dwayne Hirst Olympia Sales Company 1537 South 700 West Salt Lake City, Utah 84104

Questions Concerning Paint Operations Re:

Dear Mr. Hirst:

The Division of Air Quality appreciates the information you have provided to us on your painting operation. In reviewing the information, we find that the following additional information is needed:

- Are you converting to high volume low pressure paint guns? 1.
- 2. Where are the paint and solvent barrels stored and how do you dispose of them?
- 3. What type of process is used to check for leaks?
- What organic solvent is used to clean booths and guns? 4.
- 5. Where is the cleaning of the guns done?
- Are the painters trained in checking for leaks and in cleaning guns? 5.
- You referred to using 12 drums per month of 5238 Guardsman Blend, 392#/55. How much is 6. contained in a drum?
- 7. Is this the solvent you use for cleaning guns and booths?

The DAQ is in the process of finalizing the Ozone Maintenance Plan. Since Olympia Sales is one of the major sources listed in the plan, an Approval Order revision needs to be completed quickly. In order to do this, answers to the above questions are needed as soon as possible.

Please submit the information to my attention. If you have any questions or concerns, please call me at (801) 536-4073.

Sincerely.

Carol Nielsen, Engineering Technician New Source Review Section Division of Air Quality

End Feb.



By Olympia Sales Company

January 5, 1995

Carol Nielsen, Engineering Technician New Source Review Section Division of Air Quality 150 North 1950 West Salt Lake City, Utah 84116

Dear Ms. Nielsen:

This letter is in response to your request for additional information dated December 22, 1994.

- 1- Enclosed please find information concerning paint guns that Olympia is converting to.
- 2- The full paint and solvent barrels are stored inside a room (which has a two hour fire rating) with sealed lids until we are ready to utilize the material inside. When the barrels are empty they are re-sealed with their lids and placed in an area for pick up by Beehive Barrel.
- 3- "Leak-check" in the paint system is done by visual inspection. All pumps, piping and hoses are exposed and very easy to see if they are leaking.
- 4- The paint booths are *scraped* off; no solvents are used. The guns are cleaned with T-6 solvent. (MSDS enclosed)
- 5- Normally only the gun tips are cleaned by soaking them in a small can (6 to 12 0z.) of T-6 solvent. When a gun needs more work done, it is taken off line and sent out for repairs or repaired in our maintenance room.
- 6- Each drum of Guardsman Blend contains 55 gals.
- 7- Guardsman Blend is used to mix the stain colors.

If you have any questions or need additional information, please feel free to call me.

Very truly yours,

Juape Horat

Dwayne Hirst V.President, Operations

DH/sg enc:

4.2.5-53

RECEIVED

JAN 1 0 1995

Air Qua



COMPLIES WITH SCAQMD® AIR QUALITY RULES 1124, 1136, 1151



H.E.L.P. 2000[™] and H.E.L.P. 2500[™] Air Assisted Airless Sprayers

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HC

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OMPLIANCE

Ihe H.E.L.P. 2000 and H.E.L.P. 2500 comply with SCAQMD Air Quality Rules 1124, 1136 and 1151.

EFFICIENCY

In an independently conducted test, the H.E.L.P. 2500 achieved 84% transfer efficiency, matching or surpassing the performance of other tested HVLP units.*

LONG LIFE

Low operating fluid pressures (0-1000 psi) and chromed stainless steel wear parts prolong the lives of the units.

Test results available upon request.

PRODUCTIVITY

The H.E.L.P. 2000 and H.E.L.P. 2500 will yield production speeds equal to your present finishing system and will also reduce overspray, minimize spray booth maintenance and lessen related clean-up time.

ADAPTABILITY

High Efficiency Low Pressure conversion kits are available to upgrade your existing airless or AA 2000 equipped sprayer to full compliance.

OUR

COMPLIANT

DELIVER . . .

SPRAYERS

These compliant units feature a specially modified version of Graco's AA 2000™ air assisted airless spray gun, the preferred choice of the finishing industry.

Graco's compliant air assisted airless sprayers are specially designed to operate at air pressures ranging from .1 to 10 psi. This meets the toughest air quality equipment standards, including SCAQMD* Rules 1124, 1136 and 1151.

challenge of new air quality rules with compliant air assisted airless sprayers that meet new equipment regulations and deliver the high quality finish you demand.

Our new compliant air assisted ss sprayers operate at air sures ranging from .1 to 10 psi, fully complying with SCAQMD* Rules 1124, 1136 and 1151. The H.E.L.P. 2000 and H.E.L.P. 2500 offer the professional finisher the high transfer efficiency and production speed expected from air assisted airless spray at pressures that ensure full compliance.

So if you want to achieve fine finish quality and significant material savings at production line speeds, select one of Graco's fully compliant air assisted airless sprayers.

South Coast Air Quality Management District



A SHERE AND A SHERE AND A SALE AND AND AND A SALE AND AND AND A SALE AND AND A SALE AND A SALE AND A SALE AND A	DATE: 11/25/93
PRODUCT IDENTITY: 5550 FEOTSOLVENT	2 PAGE 1
THIS MSDS COMPLIES WITH 29 CFR 9910 PD0 HAZARD COMMUNI	ICATION STANDARD)
Poss this information to employees, ustomers, & user	sof this product.
	TU-MEDINE
VANED WHENDERNAM SAME ENGE BELV WANED WHENDERNAM SAME ENGE BELV WANES HENDERNAM SAME ENGE	0 2 -01-11-1
CHENTREC PHONE:	1200-121-2200
All components of this product are on the TSC	flon
SARA Title 111 Section 313 Supplier Notification	in Pression and
Peror ing requirements of Seel on 919 of the second 721	min Frennesy
SARASTITLE III INGREDIENTS CASE NT 4 (RE TOLUENE 30 (311.3	G. SEGUON & ROUDS FUC
*Acetone 67-64-1 19 (311,3	12,313,RCRA) 5000
Light Aliphatic Solvent Naphtha *64742-89-8 Not Appl.	(311,312)
Mernyl Isobutyl Ketone 108-10-1 11 (311,3 *Mixed Xylenes 1330-20-7 1 (311,3	12,313,RCRA)
SARA SECTION 311/312 HAZARDS: Acute Health, Fire MATERIAL CAS # TWA + (OSH	A) TLY (ACGTH)
Toluene 108-88-3 50 ppm	50-ppm
Notional Notional 200 pp	(5) 200 00 76
Hethyl Isobutyl Ketone 108-10-1 50 ppm	300 ppa 50 ppa
Mixed Xylenes 1330-20-7 100 ppm MATERIAL CAS # CELLING	100 ppm STFL (OSHA/ACGIH)
Acetone 67-64-1 None Know	in 1000 ppm
Light Aliphatic Solvent Naphtha *64742-89-8 None Know	m 750 ppm
■ Methyl Isobutyl Ketone 108-10-1 None Knom Mixed Xylenes 1330-20-7 None Knom	n 75 ppt n 150 ppt
MATERIAL CAS # LOWEST KNO	WN LETHAL DOSE DATA
Methanol 67-56-1 1000.0 m	//kg(Man)
LOWEST KNC Super VM&P *64742-89-8 3400 ppm	(Rots)
LOWEST KNU Toluene 108-88-3 4000.0 m	WN LD50 (SKIN) a/ka (Rabbits)
HAZARDS: HEALTH (NFPA) 2 HEALTH (HMIS): 2 FLAMMABILIT	Y: 3 REACTIVITY: O

DATE: 11725793 CHEMCENTRAL/SALT LAKE CITY CHEC PRODUCT IDENTITY: 5350 FORSOLVENIL SECTION 2. INGREDIENT & REGULATORY INFORMATION (CONT.) CALIFORNIA PROPOSITION 65: INS product contains the following chemicals

known to the State of California to Kause cancer & reproductive toxicity: Benzene. Toluene

Benzene, Totuenez OOT SHIPPING NAMES POINT RELOTED CONTRACTION SUN1263, PG-II DRUM LABELS (FLAWABLE LOUDD)

SECTION :: INTARDS IDENTIFICATION THRESHOLD LIMIT VALUE: 15 DDW (EVODORATED BLEND) CONTAINS: TOLUENE, ACETONE NETHANOL PETROLEUM NAPHTHA, METHYL ISOBUTYL KETONE, MIXED XYLENES

EXTREMELY FLANMABLELL VAPORS FLASH FIRE

LEUTE IL ARDS

EVE BASKIN CONTACT:

Primary irritation to skin, defatting, dermatitis. Absorption thru skin increases exposure.

Primary irritation to eyes, redness, tearing, blurred vision. Liquid can cause eye irritation, wash tharoughly after handling. INHALATION ?

Anesthetic. Irritates respiratory tract. Acute overexposure can cause serious nervous system depression. Vapor harmful. Breathing vapor can cause invitation. Acute overexposure can cause damage to kidneys, blood, nerves, liver & lungs.

Repeated exposure over TLY can cause blindness.

SWALLOWING:

Can be fatal or cause blindness if swallowed. Cannot be made non-poisonous POISON ! Can cause irreversible nervous system damage & death.. Harmful or fatal if swallowed.

Swallowing can cause abdominal irritation, nausea, vomiting & diarrhea. SUBCHRONIC HAZARDS/CONDITIONS AGGREVATED

SUBCHRONIC HAZARDS

Absorption thru skin may be harmful. Studies with laboratory animals indicate this product can cause damage to fetus.

Chronic overexposure can cause damage to kidneys, blood, nerves, liver & lungs. Persons with asthma, chronic respiratory problems, severe heart, skin, liver or kidney problems should avoid use.

CHRONIC HAZARDS

CHRONIC HAZARD:

This product has no carcinogens listed by IARC, NTP, NIOSH, OSHA or ACGIH, as of this date, greater or equal to 0.1%. This product may contain less than 1 ppm of Benzene. Not considered hazardous in such low concentrations.

DATE: 11/25/93 CHENCENTRAL/SALT LAKE CITY **I**TCHEC PRODUCT IDENTITY: 5350 T-6 SOLVENT PAGE SECTION 4. FIRST AID MEASURES PROCEDURES EYE CONTACT: For eyes, immediately flush with plenty of water for 15 minutes & CALL A PHYSICIAN. SKIN CONTACT: In case of contact with skinimmediately remove contaminated clothings (ash Thoroughly with soop of woler Mosh contaminated clothing before cruss (Discard contaminated shoes) INHALATION: After high vapor exposure; remove to fresh air. If breathing is difficult, give oxygen. If breathing has stopped give artificial respirations while A PHYSICIAN immediately SWALLOWING: Induce womiting promotivalsing physician's instructions or by having your level stick finger down throuts and ter womiting has been induced, give tho teaspoonsful of Daking Sodu in a glass of water.CALL A PHYSICIAN. Never give anything by mouth to an unconscious person. Have patient lie down is keep warm Cover eyes to exclude light ... SECTION 5. FIRE FIGHTING MEASURES 572 LOWER FLANNABLE LINIT IN AIR to vol: 2.8 FLASH POINT (TEST METHOD): -16 C / 2 F (TCC) (Lowest Component) FLANMABILITY CLASSIFICATION: CLOSS I B EXTINGUISHING MEDIA NFPA Class B extinguishers(Carbon Dioxide or foam) for Class I B liquid fires. SPECIAL FIRE FIGHTING PROCEDURES Water spray may be ineffective on fire but can protect fire-fighters & cool closed containers. Use fog nozzles if water is used. Do not enter confined fire space without full bunker gear. (Helmet with face shield, bunker costs, gloves & rubber boots). Use NIOSH approved positive-pressure self-contained breathing apparatus. UNUSUAL EXPLOSION AND FIRE PROCEDURES EXTREMELY FLAMMABLE !! VAPORS CAN CAUSE FLASH FIRE Keep container tightly closed. Isolate from oxidizers, heat, sparks, electric equipment & open flame. - Closed containers may explode if exposed to extreme heat. Applying to hot surfaces requires special precautions. Empty container very hazardous! Continue all label precautions!

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CHEMCENTRAL/SALT LAKE CITY 1 CHEC 5350 TESSOLVENT PRODUCT IDENTITY:

SECTION 6. ACCIDENTAL RELEASE MEASURES.

SPILL OR LEAK PROCEDURES

Stop spill at source. Dike area & contain. Clean up remainder with obsorbent materials. Mop up to dispose of Persons without proper protection Should be Reptition area until clause up ASTE DISPOSAL METHOD Recycle of Dispose of observing local, state & Federal health, SD/co/

opollution laws: If questions exist, contact the appropriate agencies. OTHER PRECAUTIONS

Vapors may ignite explosively a spread long distances. Prevent vopor buildupe Put out pilot lights a fum off heaters, electric equipment soin -ignition sources during use a until all vapors are gone.

SECTION 7. HANDLING AND STORAGE

HANDLING Isolate from oxidizers neat sparks, electric equipment & open flower Use only with adequate ventilation. Avoid breathing of vapor or spray mist. Avoid contact with skin a eyes.

Wear OSHA Standard goggles or face shield. Consult Safety Equipment Supplier. Wear gloves, apron & footwear impervious to this material. Wash clothing before reuse.

Avoid free fall of liquid. Ground containers when transferring. Do not flame cut, saw, drill, braze, or weld. Empty container very hazardousi Continue all label precautions:

STORAGE

Vapors may ignite explosively & spread long distances. Prevent vapor buildup. Put out pilot lights for in off heaters, electric equipment & other ignition sources during use a until all vapors are gone. Do not store above 49 C/120 F. Store large amounts in structures made for

OSHA Class I B liquids. Keep container tightly closed & upright when not in use to prevent leakage.

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION:

EXPOSURE CONTROLS

Ventilate to keep vapors of this material below

60 ppm. If over TLV, in accordance with 29 CFR 1910.134, use NIOSH approved positive-pressure self-contained breathing apparatus. Consult Safety Equipment Supplier. Use explosion-proof equipment.

VENTILATION

LOCAL EXHAUST MECHANICAL (GENERAL) SPECIAL OTHER

: Necessary : Acceptable : None : None

PERSONAL PROTECTIONS:

Wear OSHA Standard goggles or face shield. Consult Safety Equipment Supplier. Wear gloves, apron & footwear impervious to this material. Wash clothing before reuse.

DATE: 11/25/93

PAGE-4



The supplier disclaims all expressed or implied warranties of merchantability or fitness for a specific use, with respect to the product or the information provided herein, except for conformation to contracted specifications.

All information appearing herein is based upon data obtained from manufacturers and/or recognized technical sources. While the information is believed to be accurate, we make no representations as to its accuracy or sufficiency.

accurate, we make no representations as to its accuracy or sufficiency. Conditions of use are beyond our control, and therefore users are responsible for verifying the data under their own operating conditions to determine whether the product is suitable for their particular purposes and they assume all risks of their use, handling, and disposal of the product. Users also assume all risks in regards to the publication or use of, or reliance upon, information contained herein.

This information relates only to the product designated herein, and does not relate to its use in combination with any other material or process.

03/07/95 15:35 FAX 801 972 1827 RECEIV	OLYMPIA SALES	2 001
TO: Jon L. Black Air Qual TO: D.A. Q.	ity (
FROM: Dweyne Hirst	FAX	~
DATE March 7, 1995		
NUMBER OF PAGES: 2		
PHONE: 972-4050		
FAX:		×
REMARKS:		
		· ·
		<u>_</u>
CREWN CABINETS	OLYMPIA SALES COMPANY 1537 SOUTH 700 WEST SALT LAKE CITY. UTAH 84104 PHONE: 800–972–4051 FAX: 801–972–1827	4.2.5-62

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03/07/95	15:35	FAI	801	972	1827
03/06/95	12:15	FA	K 95	3640	99

OLYMPIA SALES D. A. Q. Ø 002 Ø 002

UTAH DIVISION OF AIR OUALITY NEW/MODIFIED SOURCE PLAN REVIEW

Dwayne Hirst Olympia Sales company 1537 South 700 West Salt Lake City, Utah 84104

RE:

Modification of Approval Order to Meet Standards of the Ozone Maintenance Plan Salt Lake County, CDS A1, NA; TOXICS MAJOR, TITLE V MAJOR

ENGINEER:

DATE:

NOTICE OF INTENT DATED:

PLANT CONTACT:

PHONE NUMBER: FAX NUMBER Jon L. Black, Engineering Technician

February 24, 1995

February 24, 1995

Dwayne Hirst

(801) 972-4050 (801) 972-1827

PLANT LOCATION:

4,509,700 m. Northing; 422,900 m. Easting

1537 South 700 West, Salt Lake City, Utah

UTM COORDINATES:

FEES:

Basic Approval Order Fee	. \$000.00
Review Engineer - 0 total hours at \$50.00/hour	\$000.00
Modeler - 0 hours at \$50.00/hour	\$000.00
Notice To Paper	\$80.00
Travel - 00 miles at \$0.23/mile	\$000.00

APPROVALS:

Review Engineer

(Signature & Date)

We request that you read the proposed Approval Order conditions: if you do not understand or do not agree with the contents of the conditions, please contact the review engineer within live days. However, when you understand the attached proposed/draft Approval Order conditions, please sign below and return. Thank You.

Hora 1 Applicant Contact (Signature & Dáte)

F:AQUENGINEERVIBLACK/WP/REVIEWS/OLYMPIA.RVW

4.2.5-63

1- Monthy inspection of Part Systems

Once each month all pumps, Piping, hoses and guns will be Visually inspected for heakage. a check List will be posted on the pump room wall noting The Last inspection, who made The inspection and if any Thing Was Leaking. There will also be a place Toput The date when The Leak was fixed.

2- Olympia has 4 Paint Material That The Graco H.E.L.P. guns are used apply. There are two more Stain Colors That Conventional air spray que are Usen. The Convention al guns will be replaced by The Graco H.E.L.P Guns by Nov. 15 1900.

4.2.5-64



State of Utah department of environmental quality division of air quality

Michael O. Leavitt Governor Dianne R. Nielson, Ph.D. Executive Director Russell A. Roberts Director

150 North 1950 West Salt Lake City, Utah 84114 (801) 536-4000 (801) 536-4099 Fax (801) 536-4414 T.D.D. Reply to: State of Utah Division of Air Quality P.O. Box 144820 Salt Lake City, Utah 84114-4820

DAQE-0063-94

February 3, 1994

Gene Marshall Pacificorp 1407 West North Temple Salt Lake City, Utah 84140

Re: Approval Order For SIP Change Salt Lake County CDS A1 NA Title V Major

Dear Mr. Marshall:

The attached document is an Approval Order for the above referenced project.

Please direct any technical questions you may have on this project to Mr. Tim Blanchard. He may be reached at (801) 536-4057.

Sincérely,

Russell A. Roberts, Executive Secretary Utah Air Quality Board

RAR:JTB:dn

cc: Salt Lake City/County Health Department EPA Region VIII, Mike Owens



STATE OF UTAH

Department of Environmental Quality

Division of Air Quality

APPROVAL ORDER FOR GADSBY UNITS 1, 2, AND 3 SIP CHANGES

Tim Blanchard, Engineer

APPROVAL ORDER NUMBER DAQE-0063-94

Date: February 3, 1994

Source

PACIFICORP

Russell A. Roberts Executive Secretary Utah Air Quality Board

Vol 1 1.2.0-3

Abstract

Utah Power will upgrade the Gadsby Units No. 1 and No. 2 to bring them into compliance with Section IX.H.2.b.BBB for Utah Power and Light in the State Implementation Plan (SIP) for Salt Lake County. The SIP requires that the Gadsby Plant be retrofited with new burners that meet Reasonable Available Control Technology (RACT).

The above-referenced project has been evaluated and found to be consistent with the requirements of the Utah Air Conservation Rules (UACR) and the Utah Air Conservation Act. A 30-day public comment period was held and all comments received were evaluated. The conditions of this Approval Order (AO) reflect any changes to the proposed conditions which resulted from the evaluation of the comments received. This air quality AO authorizes the project with the following conditions, and failure to comply with any of the conditions may constitute a violation of this order.

General Conditions:

1. This AO applies to the following company:

Utah Power Division of Pacificorp Electric Operations 1407 West North Temple Salt Lake City, Utah 84140

Phone Number (801) 220-2235 FAX Number (801) 220-4307

The equipment listed below in this AO shall be operated at the following location:

Gadsby Plant 1359 West North Temple Salt Lake City, Utah

Universal Transverse Mercator (UTM) Coordinate System: 4,513.250 meters Northing, 421.650 meters Easting

2. Definitions of terms, abbreviations, and references used in this AO conform to those used in the UACR, Utah Administrative Codes (UAC), State Implementation Plan (SIP) and Series 40 of the Code of Federal Regulations (40 CFR).

These definitions take precedence unless specifically defined otherwise herein.

3. Utah Power shall operate the Gadsby Power Station according to the information submitted in the Notice of Intent dated August 17, 1993, with additional information submitted November 1, 1993.

4. Regardless of any inconsistency between conditions of this AO and Section IX.H.2.b.BBB of the SIP for Utah Power and Light, this AO shall take precedence as provided by R307-1-3.2.4, UAC.

- 5. A copy of this AO shall be posted on site. The AO shall be available to the employees who operate the air emission producing equipment. These employees shall receive instruction as to their responsibilities in operating the equipment according to all of the relevant conditions listed below.
- 6. The approved installations shall consist of the following equipment:
 - A. Gadsby 1 Replace the existing six burners with six new Todd Combustion, Inc.¹ Low-NO_x burners on the existing front fired boiler.
 - B. Gadsby 2 Replace the existing six burners with six new Todd Combustion, Inc.¹ Low-NO_x burners on the existing front fired boiler.

Limitations and Tests Procedures

B.

7. Emissions to the atmosphere from the indicated emission point shall not exceed the following rates and concentrations:

A. Gadsby I

Pollutant	Lbs/hr	<u>ppmdv</u> (3% O ₂₋ drv)
NO _x	179.00	336
Gadsby 2		
<u>Pollutant</u>	<u>Lbs/hr</u>	<u>ppmdv</u> (<u>3% O₂, drv)</u>
NOx	204.00	336

C. Gadsby 3

a. Winter

November 1 through February 28:

<u>Pollutant</u>	<u>Lbs/hr</u>	<u>ppmdv</u> (3% O ₂ , dry)	
NO _x	142.00	168	

Vol 1 1.2.e-5

¹ - Or equivalent with equivalency determined by the Executive Secretary

b. Summer

March 1 through October 31:

Pollutant	<u>Lbs/hr</u>	<u>ppmdv</u> (3% O ₂ . dry)	
NO _x	203.00	168	

8. Stack testing to show compliance with the emission limitations stated in the above condition shall be performed as specified below:

Α.	Emission Point	<u>Pollutant</u>	Testing Status	<u>Test</u> Frequency
	Gadsby 1	NOx	*	**
	Gadsby 2	NO _x	*	**
	Gadsby 3	NO _x	*	**

B. <u>Testing Status</u> (To be applied above

Initial compliance testing is required. The initial test date shall be within 180 days after the start-up of the unit.

****** Test every two (2) years after the initial testing.

C. <u>Notification</u>

The applicant shall provide a notification of the test date at least 45 days before the test. A pretest conference shall be held if directed by the Executive Secretary. It shall be held at least 30 days before the test between the owner/operator, the tester, and the Executive Secretary.

The emission point shall be designed to conform to the requirements of 40 CFR 60, Appendix A, Method 1, and Occupational Safety and Health Administration (OSHA) or Mine Safety and Health Administration (MSHA) approvable access shall be provided to the test location.

D. <u>Sample Location</u>

40 CFR 60. Appendix A, Method 1

E. Volumetric Flow Rate

40 CFR 60, Appendix A, Method 2

F. <u>Nitrogen Oxides (NO.)</u>

40 CFR 60, Appendix A, Method 7, 7A, 7B, 7C, 7D or 7E

G. <u>Calculations</u>

To determine mass emission rates (lbs/hr, etc.), the pollutant concentration as determined by the appropriate methods above, shall be multiplied by the volumetric flow rate and any necessary conversion factors determined by the Executive Secretary to give the results in the specified units of the emission limitation.

H. Existing Source Operation

a. Gadsby I

For an existing source/emission point, the production rate during all compliance testing shall be no less than 90% of the input heat capacity (653 MMBTU/HR).

b. Gadsby 2

For an existing source/emission point, the production rate during all compliance testing shall be no less than 90% of the input heat capacity (742 MMBTU/HR).

c. Gadsby 3

For a emission point, the production rate during compliance testing for the summer-time emission limitations shall be preformed at no less than 90% of the input heat capacity (1,040 MMBTU/HR). The production rate during compliance testing for the winter-time emission limitation shall be no less than 90% of the heat input rate correlating to 70% capacity factor used to calculate the winter-time emission rates (730 MMBTU/HR).

201

Visible emissions from the Gadsby stacks shall not exceed 10% opacity. Opacity observations of emissions from stationary sources shall be conducted in accordance with 40 CFR 60, Appendix A, Method 9.

Fuels

10. The owner/operator shall use only natural gas as a primary fuel and No. 2 fuel oil or better as back-up fuel in the boilers. If any other fuel is to be used an AO shall be required in accordance with R307-1-3.1, UAC. The No. 2 fuel oil may be used only during periods of natural gas curtailment and for maintenance firings. Maintenance firings shall not exceed one-percent of the annual plant BTU requirement. In addition, maintenance firings shall be scheduled between April 1 and November 30 of any calendar year. Records of fuel oil use shall be kept which shows the date the fuel oil was fired, the duration in hours the fuel oil was fired, the amount of fuel oil consumed during each

curtailment, and the reason for each firing. Records shall be made available to the Executive Secretary or his representative upon request, and shall include a period of two years ending with the date of the request.

11. The sulfur content of any fuel burned shall not exceed 0.45% by weight as determined by ASTM Method D-4294-89 or approved equivalent. The sulfur content shall be tested if directed by the Executive Secretary.

Records & Miscellaneous

- 12. The Executive Secretary shall be notified in writing upon start-up of the installation as an initial compliance inspection is required. Eighteen months from the date of this AO the Executive Secretary shall be notified in writing of the status of installation if installation is not completed. At that time the Executive Secretary shall require documentation of the continuous installation of the operation and may revoke the AO in accordance with R307-1-3.1.5, UAC. If construction is complete and operation has commenced a notice is not required.
- 13. All records referenced in this AO which are required to be kept by the owner/operator shall be made available to the Executive Secretary or his representative upon request. Examples of records to be kept at this source shall include the following as applicable:
 - A. Fuel oil consumption (Condition 10)
 - B. Maintenance records (Condition 10)
 - C. Upset, breakdown episodes (Condition 16)
 - D. Emergency plan (Condition 17)
- 14. All installations and facilities authorized by this AO shall be adequately and properly maintained. All pollution control vendor recommended equipment shall be installed, maintained, and operated. Instructions from the vendor or established maintenance practices that maximize pollution control shall be used. All necessary equipment control and operating devices such as pressure gauges, amp meters, volt meters, flow rate indicators, temperature gauges, CEMs, etc., shall be installed and operated properly and easily accessible to compliance inspectors. A copy of all manufacturers' operating instruction for pollution control equipment and pollution emitting equipment shall be kept on site. These instructions shall be available to all employees who operate the equipment, and shall be made available to compliance inspectors upon their request.
- 15. The owner/operator shall comply with R307-1-3.5, UAC. This rule addresses emission inventory reporting requirements.
- 16. The owner/operator shall comply with R307-1-4.7, UAC. This rule addresses unavoidable breakdown reporting requirements. The owner/operator shall calculate/estimate the excess emissions whenever a breakdown occurs. The total of excess emissions shall be reported to the Executive Secretary as directed for each calendar year.
- 17. <u>The owner/operator shall submit to the Executive Secretary an emergency plan within 60</u> <u>days of the date of this AO</u>. The plan shall identify what control measures the owner/operator shall implement when an emergency episode is declared by the Executive

1 1.2.6-

Director of the Department of Environmental Quality. Specific emission reduction measures shall be outlined for all three levels (Alert, Warning, Emergency). The values for the various levels are listed in R307-1-5, UAC. Also see 40 CFR, Part 51, Subpart H (40 CFR 51.150 to 153) and appendix L. The emergency plan shall be approved by the Executive Secretary. The Alert Level actions to be taken should be curtailment of all unnecessary activities causing air pollution. The other two levels of actions should be a progressive curtailment of production and activities causing pollution, to the point of complete shutdown of operations.

Any future modifications to the equipment approved by this order must also be approved in accordance with R307-1-3.1.1, UAC.

This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including the UACR.

Annual emissions for this source, the Gadsby power station, are currently calculated at the following values:

Pollutant	<u>Tons/vr</u>
Particulate	63.15
PM ₁₀	61.31
SO₂	67.73
NOr	2511.58
CO	458.61
VOC nonmethane	16.55

These calculations are for the purposes of determining the applicability of Prevention of Significant Deterioration and nonattainment area major source requirements of the UACR.

In accordance with the requirements of Title V of the 1990 Clean Air Act, the following pollutants may be subject to an operating permit fee. Both the fee rate and the class of pollutants are subject to change by state, the federal agencies, or both.

Pollutant	<u>Tons/vr</u>
PM ₁₀	61.31
SO,	67.73
NOx	2511.58
CO	458.61
VOC nonmethane	16.55
Approved By:	
Russell A Roberts Executive Secretary	

Russell A. Roberts, Executive Secretary Division of Air Quality Vol 1 1.2.0-9