



March 23, 2022

Mr. Dominic Nicandri
Western Star Northwest
600 S 56th Place
Ridgefield, WA 98642

Subject: Final Approval for Truck Auto Body Shop

Dear Mr. Nicandri:

A final determination to issue Air Discharge Permit (ADP) 22-3506 has been completed for ADP application CL-3183 pursuant to Section 400-110(4) of the General Regulations for Air Pollution Sources of the Southwest Clean Air Agency (SWCAA). Public notice for ADP application CL-3183 was published in the permit section of SWCAA's website on February 24, 2022. SWCAA did not receive a request for a public comment period in response to the public notice and has concluded that significant public interest does not exist for this determination. Therefore, a public comment period will not be provided for this permitting action. Electronic copies of ADP 22-3506 and the associated Technical Support Document are available for public review in the "Recent Air Discharge Permits" section under the "Air Permits" link on SWCAA's website (<http://www.swcleanair.gov>). Original copies are enclosed for your files.

ADP 22-3506 may be appealed directly to the Pollution Control Hearings Board (PCHB) at P.O. Box 40903, Olympia, Washington 98504-0903 within thirty (30) days of receipt as provided in Revised Code of Washington (RCW) 43.21B.

If you have any questions or comments, or desire additional information, please contact me or Vannessa McClelland at (360) 574-3058, extension 129.

Sincerely,

Uri Papish
Executive Director

UP:vm

Enclosure: Technical Support Document and Air Discharge Permit 22-3506





SWCAA
Southwest Clean Air Agency

AIR DISCHARGE PERMIT
22-3506

Issued: March 23, 2022

Western Star NW
600 S 56th Place
Ridgefield WA 98642

SWCAA ID – 2750

REVIEWED BY: Clinton Lamoreaux
Clinton Lamoreaux, Acting Chief Engineer



APPROVED BY: Uri Papish
Uri Papish, Executive Director

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1. Equipment/Activity Identification

ID No.	Equipment/Activity	Control Equipment/Measure
1	Rohner Truck Booth	Forty-eight High Efficiency PM Filters
2	Rohner Truck Booth Heater	Ultralow Sulfur Fuel (Natural Gas)
3	Spray Systems Inc. Mix Room	None
4	Raypak Boiler	Ultralow Sulfur Fuel (Natural Gas)
5	Twenty-five Space Heaters	Ultralow Sulfur Fuel (Natural Gas)
6	Emergency Generator Engine (MTU 804 bhp)	Ultra-Low Sulfur Diesel ($\leq 0.0015\%$ S), Limited Operation

2. Permit Requirements

The following tables detail the specific requirements of this Air Discharge Permit (ADP). In addition to the requirements listed below, equipment at this facility may be subject to other federal, state, and local regulations. The requirement number is identified in the left-hand column. The text of the requirement is contained in the middle column. The emission unit, equipment, or activity to which the requirement applies is listed in the right-hand column.

Emission Limits

Req. No.	Emission Limits	Equipment/ Activity ID No.						
1.	<p>Combined emissions from spray coating operations must not exceed any of the following:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>VOC</td><td>3.00 tons per year</td></tr><tr><td>TAPs</td><td>Limited to SQER for each pollutant. Combined TAPs (not including acetone or other non-VOC TAPs) must not exceed the VOC emission limit established above</td></tr></table> <p>Emissions must be calculated based on actual material consumption, manufacturer's material data, and material balance methodology consistent with Section 6 of the Technical Support Document (TSD) for this ADP.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	VOC	3.00 tons per year	TAPs	Limited to SQER for each pollutant. Combined TAPs (not including acetone or other non-VOC TAPs) must not exceed the VOC emission limit established above	1, 3
<u>Pollutant</u>	<u>Emission Limit</u>							
VOC	3.00 tons per year							
TAPs	Limited to SQER for each pollutant. Combined TAPs (not including acetone or other non-VOC TAPs) must not exceed the VOC emission limit established above							

Req. No.	Emission Limits	Equipment/ Activity ID No.						
2.	<p>Emissions from the booth heater must not exceed the following:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>NO_x</td><td>1.16 tons per year</td></tr><tr><td>CO</td><td>0.97 tons per year</td></tr></table> <p>Emissions must be calculated consistent with the methodology and emission factors presented in Section 6 of the TSD for this ADP unless unit specific source test data is collected.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO _x	1.16 tons per year	CO	0.97 tons per year	2
<u>Pollutant</u>	<u>Emission Limit</u>							
NO _x	1.16 tons per year							
CO	0.97 tons per year							
3.	<p>Emissions from the boiler must not exceed the following:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>NO_x</td><td>0.08 tons per year</td></tr><tr><td>CO</td><td>0.08 tons per year</td></tr></table> <p>Emissions must be calculated consistent with the methodology and emission factors presented in Section 6 of the TSD for this ADP unless unit specific source test data is collected.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO _x	0.08 tons per year	CO	0.08 tons per year	4
<u>Pollutant</u>	<u>Emission Limit</u>							
NO _x	0.08 tons per year							
CO	0.08 tons per year							
4.	<p>Emissions from the space heaters must not exceed the following:</p> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>NO_x</td><td>2.04 tons per year</td></tr><tr><td>CO</td><td>1.72 tons per year</td></tr></table> <p>Emissions must be calculated consistent with the methodology and emission factors presented in Section 6 of the TSD for this ADP unless unit specific source test data is collected.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO _x	2.04 tons per year	CO	1.72 tons per year	5
<u>Pollutant</u>	<u>Emission Limit</u>							
NO _x	2.04 tons per year							
CO	1.72 tons per year							
5.	<p>Visible emissions from the painting operations and natural gas-fired equipment must not exceed zero percent (0%) opacity for more than three (3) minutes in any 1-hour period as determined by a Certified Observer in accordance with SWCAA Method 9.</p>	1 - 5						
6.	<p>Visible emissions from the emergency generator engine must not exceed the following for more than three (3) minutes in any 1-hour period, as determined by a Certified Observer in accordance with SWCAA Method 9:</p> <p>(a) Twenty percent (20%) during startup or shutdown; and</p> <p>(b) Five percent (5%) at all other times.</p> <p>The startup period is defined as the first twenty (20) minutes of operation from a cold start and shutdown is defined as when fuel flow to the engine has stopped.</p>	6						

Operating Limits and Requirements

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
7.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
8.	Odors from the facility must not unreasonably interfere with any other property owner's use and enjoyment of the property. Recognized good practice and procedures must be used to reduce odors to a reasonable minimum.	Facility-wide
9.	Emission units and activities identified in this ADP must be maintained and operated in total and continuous conformity with the conditions identified in this ADP. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this ADP, including directing the facility to cease operations until corrective action can be completed.	Facility-wide
10.	Each pollution control device must be operated whenever the processing equipment served by that air pollution control device is in operation. Control devices must be operated and maintained in accordance with the manufacturer's specifications. Furthermore, air pollution control devices must be operated in a manner that minimizes emissions.	1
11.	All exhausts must be discharged vertically into the ambient air above the level of the building roof. Any device that obstructs or prevents vertical discharge is prohibited.	1 -4, 6
12.	All surface coating must be performed inside the truck booth, unless otherwise specified by SWCAA.	1
13.	The doors of the mix room and truck booth shall be kept closed when paint mixing, prep work, and spray painting operations occur within.	1, 3
14.	A differential pressure gauge must be installed and maintained to measure the pressure drop across the truck booth exhaust filter media.	1
15.	All containers for VOC containing materials must be kept securely closed with a lid in place except when in active use. Open containers for storage, transfer or disposal of VOC containing materials are prohibited. In addition, all VOC containing materials used to clean and/or flush spray equipment or lines during clean up must be collected and stored in a closed container.	Facility-wide
16.	All windows and doors must remain closed in the area/bay where active sanding and surface prep operations are occurring.	Facility-wide
17.	Spray application of coatings containing chromium, lead, manganese, nickel, or cadmium compounds at a concentration greater than 0.1% by weight is prohibited.	Facility-wide
18.	All spray coating must be performed with high transfer efficiency spray equipment including, but not limited to, spray guns with HVLP or air-assisted airless configurations. All spray coating equipment must be operated in accordance with manufacturer's specifications.	1

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
19.	The truck booth must be operated with exhaust filters demonstrated to achieve a minimum of 98% capture efficiency of overspray. When multiple layers of filters are used, the combined capture efficiency must achieve a minimum of 98%.	1
20.	The booth heater, boiler, and space heaters must only be fired on natural gas.	2, 4, 5
21.	If the results from any emission monitoring event for the boiler indicate that emission concentrations may exceed 30 ppmvd NO _x @ 3% O ₂ or 50 ppmvd CO @ 3% O ₂ , the Permittee must either perform 60 minutes of additional monitoring to more accurately quantify CO and NO _x emissions or initiate corrective action. Additional testing or corrective action must be initiated as soon as practical but no later than three days after the potential exceedance is identified. Corrective action includes tuning, maintenance by service personnel, limitation of boiler load, or other action taken to maintain compliance with permitted limits. Monitoring of unit emissions must be conducted within three days following completion of any corrective action to confirm that the corrective action has been effective. Corrective action must be pursued until observed emission concentrations no longer exceed 30 ppmvd NO _x @ 3% O ₂ or 50 ppmvd CO @ 3% O ₂ .	4
22.	The emergency generator engine must only be fired on fuel oil with a maximum sulfur content of 15 ppmw. Any fuel other than ultra-low sulfur fuel oil must be approved by SWCAA in writing prior to use.	6
23.	The emergency generator engine must be equipped with a non-resettable hour meter to record hours of operation.	6
24.	Operation of the emergency generator engine for maintenance checks and readiness testing must not exceed 100 hours per year. Emergency operation of the emergency engine is not limited.	6

Monitoring and Recordkeeping Requirements

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
25.	With the exception of data logged by a computerized data acquisition system, each record required by this ADP must include the date and the name of the person making the record entry, at minimum. If a control device or process is not operating, a record must be made to that effect.	Facility-wide
26.	All records required by this ADP must be kept for a minimum period of no less than three (3) years and must be maintained in a form readily available for inspection by SWCAA representatives.	Facility-wide
27.	Excess emissions and upset conditions must be recorded for each occurrence.	Facility-wide
28.	For each product used or produced at the facility that contains VOC, HAP, or TAP, the Permittee must maintain purchase receipts for quantities, Safety Data Sheet information, and Technical Data Sheets in a readily accessible form.	Facility-wide

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
29.	<p>The following must be monitored and recorded as follows:</p> <ul style="list-style-type: none"> (a) Differential pressure across the exhaust filter media of the truck booth must be recorded weekly; (b) Spray coating material consumption must be recorded monthly; (c) The quantity and type of hazardous waste disposal must be recorded monthly; (d) The total amount of natural gas consumed must be recorded for each calendar year. Billing records may serve this purpose; and (e) Filter changes and maintenance activities must be recorded for each occurrence. 	1 – 6

Emission Monitoring and Testing Requirements

Req. No.	Emission Monitoring and Testing Requirements	Equipment/ Activity ID No.
30.	The initial emission monitoring of the boiler must be conducted by June 30, 2022. Subsequent emission monitoring must be conducted on a 12-month cycle in accordance with Appendix A of this ADP.	4

Reporting Requirements

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
31.	Upset conditions must be reported to SWCAA within five (5) business days after discovery. The Permittee may provide notification to SWCAA via telephone or email. A message may be left on the answering machine for upset conditions that occur outside of normal business hours.	Facility-wide
32.	<p>Excess emissions must be reported to SWCAA as follows:</p> <ul style="list-style-type: none"> (a) As soon as possible, but no later than twelve (12) hours after discovery for emissions that represent a potential threat to human health or safety; (b) As soon as possible, but no later than forty-eight (48) hours after discovery for emissions which the Permittee wishes to claim as unavoidable pursuant to SWCAA 400-107(1); and (c) No later than thirty (30) calendar days after the end of the month of discovery for all other excess emissions. 	Facility-wide
33.	Deviations from permit conditions must be reported no later than 30 days after the end of the month during which the deviation is discovered.	Facility-wide
34.	All air quality related complaints received by the Permittee must be reported to SWCAA within three (3) calendar days of receipt. Complaint reports must include the date and time of the complaint, the name and contact information (if available) for the complainant, the nature of the complaint, and any actions taken by the Permittee to address the complaint.	Facility-wide

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
35.	<p>A written report must be submitted to SWCAA at least seven (7) calendar days prior to the use of any new product that contains VOCs, TAPs, or HAPs. The report must contain the following:</p> <ul style="list-style-type: none"> (a) A description of the type of product (e.g. paint, solvent, etc.), the Safety Data Sheets and Technical Data Sheets, and the location where the product will be used; (b) The date by which the Permittee intends to begin use of the product; (c) The amount (gallons or lb) expected to be used; (d) A quantification of the change in VOC, HAP and TAP emissions from the use of the product; and (e) A summary of any applicable requirement that would apply as a result of the product. <p>If the new product would cause any emission limit to be exceeded, the Permittee must submit an ADP application to SWCAA to request a revision to this ADP. The Permittee must not begin using the new product until a revised ADP is issued.</p> <p>Any new product that is only to be used for testing purposes with a quantity of five (5) gallons or less of usage does not need to be reported to SWCAA prior to use.</p>	Facility-wide
36.	<p>An annual emissions inventory report must be submitted to SWCAA by March 15 for emissions from the previous calendar year in accordance with SWCAA 400-105(1). Each report must contain, at a minimum, the following information:</p> <ul style="list-style-type: none"> (a) The annual sum of emissions of NO_x, CO, VOC, PM, PM₁₀, PM_{2.5}, SO₂, TAPs, and HAPs; (b) The quantity of each product (gallons or lbs) containing VOCs, TAPs, or HAPs; (c) The quantity and type of hazardous waste disposed; (d) The quantity of natural gas consumed by the booth heater, boiler, hot water heater, and space heaters. If only facility-wide or building specific natural gas consumption is available, this value may be reported in lieu of individual consumption; and (e) The total number of hours the emergency generator engine operated. 	1 – 6
37.	Emission monitoring results must be reported to SWCAA in writing within fifteen (15) calendar days of completion.	4
38.	Within ten (10) business days of initiating normal operation of the spray booth, Permittee must notify SWCAA that the unit is operating.	1

3. General Provisions

Req. No.	General Provisions
A.	For the purpose of ensuring compliance with this ADP, duly authorized representatives of the Southwest Clean Air Agency must be permitted access to the Permittee's premises and the facilities being constructed, owned, operated and/or maintained by the Permittee for the purpose of inspecting said facilities. These inspections are required to determine the status of compliance with this ADP and applicable regulations and to perform or require such tests as may be deemed necessary.
B.	The provisions, terms, and conditions of this ADP bind the Permittee, its officers, directors, agents, servants, employees, successors and assigns, and all persons, firms, and corporations acting under or for the Permittee.
C.	The requirements of this ADP survive any transfer of ownership of the source or any portion thereof.
D.	This ADP must be posted conspicuously at or be readily available near the source.
E.	This ADP will be invalidated, in whole or in part, if construction or installation of any new or modified equipment has not commenced within eighteen (18) months from date of issuance, if construction is discontinued for a period of eighteen (18) months or more without prior SWCAA approval, or if construction is not completed within a reasonable time
F.	This ADP does not supersede requirements of other Agencies with jurisdiction and further, this ADP does not relieve the Permittee of any requirements of any other governmental Agency. In addition to this ADP, the Permittee may be required to obtain permits or approvals from other agencies with jurisdiction.
G.	Compliance with the terms of this ADP does not relieve the Permittee from the responsibility of compliance with SWCAA General Regulations for Air Pollution Sources, previously issued Regulatory Orders, RCW 70A.15, Title 173 WAC or any other applicable emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply.
H.	If any provision of this ADP is held to be invalid, all unaffected provisions of the ADP will remain in effect and be enforceable.
I.	No change in this ADP will be made or be effective except as may be specifically set forth by written order of the Southwest Clean Air Agency upon written application by the Permittee for the relief sought.
J.	The Southwest Clean Air Agency may, in accordance with RCW 70A.15, impose such conditions as are reasonably necessary to assure the maintenance of compliance with the terms of this ADP, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act.

Appendix A

Emission Monitoring Requirements

Raypak Boiler

1. Background

The purpose of emission monitoring ("tuning") is to quantify emissions from the Raypak boiler, provide a basis to adjust the boiler as necessary to minimize emissions, and to provide a reasonable assurance that the boiler is operating properly.

2. Test Constituents and Test Methods

- (a) Oxygen (O₂) using a calibrated portable combustion analyzer or EPA Methods 3 or 3A;
- (b) Nitrogen oxides (NO_x) using a calibrated portable combustion analyzer or EPA Method 7E; and
- (c) Carbon monoxide (CO) using a calibrated portable combustion analyzer or EPA Method 10.

Combustion analyzers include electrochemical cell combustion analyzers, analyzers used for reference method testing, or other analyzers pre-approved by SWCAA.

3. Monitoring Requirements

- (a) Dates. Emission monitoring must be conducted at least once within every twelve (12) month period no later than June 30, while firing on natural gas, unless the unit is not in use during that year, or a reference method source testing was conducted on that unit during that year.
- (b) Source Operation. The boiler operation during the emissions monitoring must be representative of current intended operating conditions.
- (c) Data Collection.
 - (1) Sampling must consist of at least one (1) test consisting of at least five (5) minutes of data collection following a "ramp-up phase." The ramp-up phase ends when analyzer readings have stabilized (less than 5% per minute change in emission concentration). Emission concentrations must be recorded at least once every thirty (30) seconds during the data collection phase. All test data collected following the ramp-up phase must be reported to SWCAA.
 - (2) The analyzer(s) response to span gas of a known concentration must be determined before and after testing. No more than twelve (12) hours may elapse between span gas response checks. The results of the analyzer response will not be valid if the pre and post response check results vary by more than 10% of the known span gas value.
 - (3) The CO and NO_x span gas concentrations must be no less than 50% and no more than 200% of the emission concentration corresponding to the permitted emission limit. A lower concentration span gas may be used if it is more representative of measured concentrations. Ambient air may be used to zero the CO and NO_x cells/analyzer(s) and span the oxygen cell/analyzer.
 - (4) If the monitoring results from any monitoring event indicate that emission concentrations exceed the permitted emission limits for the unit, the Permittee must either perform sixty (60) minutes of additional monitoring to more accurately quantify CO and NO_x emissions, or initiate corrective action. Additional monitoring or corrective action must be initiated as soon as practical but no later

Appendix A
Emission Monitoring Requirements
Raypak Boiler

than three (3) calendar days after the exceedance is identified. Corrective action includes tuning, maintenance by service personnel, limitation of unit load, or other action taken to maintain compliance with permitted limits. Monitoring of unit emissions must be conducted within three (3) calendar days following completion of any corrective action to confirm that the corrective action has been effective. Initiation of corrective action does not shield the Permittee from enforcement.

NO _x	CO
(ppmvd @ 3% O ₂)	(ppmvd @ 3% O ₂)
30	50

4. Reporting Requirements

Monitoring results must be reported to SWCAA within fifteen (15) calendar days of completion. The average of the results is evaluated against the requirements of ADP 22-3506. Results must be submitted on forms provided by SWCAA or in an alternative format previously approved by SWCAA. The report must include the following information:

- (a) A description of the emission unit, including manufacturer, model number and facility designation;
- (b) Time and date of the emissions evaluation;
- (c) Identification of the personnel involved;
- (d) Test "tapes" or other direct information generated by the monitoring equipment;
- (e) All collected data, calculations, and final results, reported in units consistent with the applicable emission standard or limit;
- (f) Final test result concentrations will be corrected to 3% O₂;
- (g) A summary of control system or equipment operating conditions;
- (h) A description of the evaluation methods or procedures used, including all field data, quality assurance/quality control procedures and documentation; and
- (i) Calibration error checks documentation.

A spreadsheet version of the SWCAA Combustion Equipment Monitoring Data Sheet is available at <https://www.swcleanair.gov/forms/misc.asp>.

5. Changes to Requirements

Monitoring must be conducted as specified in the sections above. The Permittee may submit a written request to SWCAA for approval of minor modifications to the requirements above or the monitoring schedule. Upon review of the request and in accordance with EPA delegation, SWCAA will inform the Permittee in writing of any approved modifications.

