



TECHNICAL SUPPORT DOCUMENT

**Air Discharge Permit 23-3560
Air Discharge Permit Application CL-3218**

Issued: January 11, 2023

Vancouver Sign Company Inc.

SWCAA ID – 1002

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Southwest Clean Air Agency

TABLE OF CONTENTS

1. FACILITY IDENTIFICATION	1
2. FACILITY DESCRIPTION	1
3. CURRENT PERMITTING ACTION.....	1
4. PROCESS DESCRIPTION	1
5. EQUIPMENT/ACTIVITY IDENTIFICATION	2
6. EMISSIONS DETERMINATION	3
7. REGULATIONS AND EMISSION STANDARDS	6
8. BACT/PSD/CAM DETERMINATIONS	9
9. AMBIENT IMPACT ANALYSIS	9
10. DISCUSSION OF APPROVAL CONDITIONS	10
11. START-UP AND SHUTDOWN/ALTERNATIVE OPERATING SCENARIOS/POLLUTION PREVENTION.....	11
12. EMISSION MONITORING AND TESTING.....	11
13. FACILITY HISTORY	11
14. PUBLIC INVOLVEMENT OPPORTUNITY	12

ABBREVIATIONS

List of Acronyms

ADP	Air Discharge Permit	NOV	Notice of Violation/
AP-42	Compilation of Emission Factors, AP-42, 5th Edition, Volume 1, Stationary Point and Area Sources – published by EPA	NSPS	New Source Performance Standard
ASIL.....	Acceptable Source Impact Level	PSD	Prevention of Significant Deterioration
BACT.....	Best available control technology	RCW	Revised Code of Washington
CAM	Compliance Assurance Monitoring	SCC.....	Source Classification Code
CAS#.....	Chemical Abstracts Service registry number	SDS	Safety Data Sheet
CFR.....	Code of Federal Regulations	SQER	Small Quantity Emission Rate listed in WAC 173-460
EPA	U.S. Environmental Protection Agency	Standard	Standard conditions at a temperature of 68°F (20°C) and a pressure of 29.92 in Hg (760 mm Hg)
EU	Emission Unit	SWCAA	Southwest Clean Air Agency
mfr.....	Manufacturer	T-BACT	Best Available Control Technology for toxic air pollutants
NESHAP	National Emission Standards for Hazardous Air Pollutants	WAC	Washington Administrative Code

List of Units and Measures

µg/m ³	Micrograms per cubic meter	MMBtu	Million British thermal unit
µm.....	Micrometer (10 ⁻⁶ meter)	MMcf.....	Million cubic feet
acfm	Actual cubic foot per minute	ppm	Parts per million
bhp	Brake horsepower	ppmv	Parts per million by volume
dscfm.....	Dry Standard cubic foot per minute	ppmvd.....	Parts per million by volume, dry
g/dscm.....	Grams per dry Standard cubic meter	ppmw	Parts per million by weight
gpm	Gallon per minute	rpm.....	Revolution per minute
gr/dscf	Grain per dry standard cubic foot	scfm	Standard cubic foot per minute
kW.....	Kilowatt	tpy	Tons per year

List of Chemical Symbols, Formulas, and Pollutants

CO.....	Carbon monoxide	PM ₁₀	PM with an aerodynamic diameter 10 µm or less
CO ₂	Carbon dioxide	PM _{2.5}	PM with an aerodynamic diameter 2.5 µm or less
CO _{2e}	Carbon dioxide equivalent	SO ₂	Sulfur dioxide
HAP	Hazardous air pollutant listed pursuant to Section 112 of the Federal Clean Air Act	SO _x	Sulfur oxides
NO ₂	Nitrogen dioxide	TAP.....	Toxic air pollutant pursuant to Chapter 173-460 WAC
NO _x	Nitrogen oxides	TSP	Total Suspended Particulate
O ₂	Oxygen	VOC.....	Volatile organic compound
PM.....	Particulate Matter with an aerodynamic diameter 100 µm or less		

Terms not otherwise defined have the meaning assigned to them in the referenced regulations or the dictionary definition, as appropriate.

1. FACILITY IDENTIFICATION

Applicant Name: Vancouver Sign Company Inc.
Applicant Address: 3800 Fruit Valley Road, Suite B, Vancouver, WA 98668

Facility Name: Vancouver Sign Company Inc.
Facility Address: 3800 Fruit Valley Road, Suite B, Vancouver, WA 98668

SWCAA Identification: 1002

Contact Person: Richard Miller, President

Primary Process: Sign Manufacturing Facility
SIC/NAICS Code: 3993: Sign Manufacturing
238990: Sign Erection

Facility Classification: Natural Minor

2. FACILITY DESCRIPTION

Vancouver Sign Company Inc. (Vancouver Sign Company) designs, manufactures, and installs signs. Spray coating is the primary air pollutant generating activity at this facility.

3. CURRENT PERMITTING ACTION

This permitting action is in response to Air Discharge Permit (ADP) application number CL-3218 dated November 28, 2022. Vancouver Sign Company Inc. submitted ADP application 23-3560 requesting the following:

- Approval of an existing replacement spray booth, mixing room and associated make-up air unit.

Vancouver Sign Company was previously permitted at 2600 NE Andresen Road, Suite 50 in Vancouver, WA for the same purpose.

4. PROCESS DESCRIPTION

This facility operates one paint mixing room and one natural gas heated spray booth. Paint is applied with HVLP or other high transfer efficiency spray guns. There is no externally ventilated preparation area.

5. EQUIPMENT/ACTIVITY IDENTIFICATION

- 5.a. Spray Booth. The Rohner Spray Booth (m/n ICD-PP-IPPEB-14-12-IPPEB) is a cross draft booth, measuring 14' wide by 12' high by 24' deep (interior), and equipped with one 5-hp, 36" diameter exhaust fan (GFA). Face velocity is approximately 100 fpm across the door intakes.

Exhaust Flow: 16,800 acfm
 Date Installed: March 2021
 Heater Input Rating: 1.3 MMBtu/hr
 Heater Make/Model: Rohner/GH-VSU
 Stack Description: 36" diameter stack, 25' above ground level, 6' above roof level at 45°38'58.51"N, 122°41'33.59"W

- 5.b. Paint Mixing Room. The Rohner Mixing Room (m/n MX-9-8-12) passive air unit with supply filters, measuring 9' wide by 8' high by 12' deep (interior), and equipped with one 0.25-hp supply fan. Face velocity is approximately 100 fpm across the door intakes.

Exhaust Flow: 1,291 acfm
 Date Installed: November 2021
 Stack Description: Exact Dimensions are not available. Engineering drawings indicate that the paint mixing room exhausts at the same height as the paint booth.

Other Equipment/Activities:

- 5.c. Space Heating. Seven 0.125 MMBtu/hr natural gas fired tube heaters provide space heating to the facility.
- 5.d. Fabrication. Small amounts of cutting, grinding, and welding are conducted. These activities are conducted indoors (not ventilated outdoors) and are not expected to be significant sources of emissions.
- 5.e. Equipment/Activity Summary.

ID No.	Equipment/Activity	Control Equipment/Measure
1	Spray Coating – Spray Booth (Rohner, ICD-PP-IPPEB-14-12-24-IPPEB)	Process Enclosure, High Transfer Efficiency Spray Guns (Minimum of 65%), High Efficiency (at least 98%) Particulate Filters
2	Paint Mixing Room (Rohner, MX-9-8-12)	Process Enclosure, Elevated Exhaust
3	Spray Booth Heater (Rohner, GH-VSU)	Ultralow Sulfur Fuel (Natural Gas)

6. EMISSIONS DETERMINATION

Unless otherwise specified by SWCAA, actual emissions must be determined using the specified input parameter listed for each emission unit and the following hierarchy of methodologies:

- (a) Continuous emissions monitoring system (CEMS) data;
- (b) Source emissions test data (EPA reference method). When source emissions test data conflicts with CEMS data for the time period of a source test, source test data must be used;
- (c) Source emissions test data (other test method); and
- (d) Emission factors or methodology provided in this TSD.

- 6.a. Painting. Emissions of VOCs, TAPs and HAPs from painting operations were calculated using safety data sheets (SDS) and/or technical data sheet information for individual coating products, and scaling calendar year 2021 emissions in relation to the previously established VOC limit. The calculations do not assume that any of the VOC is shipped off-site as waste.

Pollutant	CAS #	TAP Emissions (lb/yr)	HAP Emissions (lb/yr)	SQER (lb/period)
2-Butoxyethanol	111-76-2	0.00	0.00	43,748
Acetone	67-64-1	0.00	0.00	43,748
n-Butyl Alcohol	71-36-3	0.00	0.00	43,748
sec-Butyl Alcohol	78-92-2	0.00	0.00	43,748
Carbon Black	1333086-4	0.10	0.00	1,750
Ethylene Glycol Monopropyl Ether	2807-30-9	109.36	109.36	No SQER
Ethylene Glycol Monobutyl Ether Acetate	112-07-2	16.80	16.80	No SQER
n-Butyl Acetate	123-86-4	56.03	0.00	43,748
n-Butyl Alcohol	71-36-3	0.00	0.00	43,748
Ethyl Acetate	141-78-6	0.00	0.00	43,748
Ethyl Alcohol	64-17-5	0.00	0.00	43,748
Ethylbenzene	100-41-4	245.30	245.30	43,748
Formaldehyde	50-00-0	0.00	0.00	20
Hexamethylene Diisocyanate	822-06-0	0.00	0.00	175
Heptane (n-Heptane)	142-82-5	16.80	0.00	43,748
Hexane (n-Hexane)	110-54-3	41.99	41.99	22,750
Isobutyl Acetate	110-19-0	751.30	0.00	43,748
Isopropyl Alcohol	67-63-0	916.79	0.00	43,748
Isobutyl Alcohol	78-83-1	182.26	0.00	43,748
Methyl Alcohol	67-56-1	0.00	0.00	43,748
Methylcyclohexane	108-87-2	16.80	0.00	43,748
Methyl n-Amyl Ketone	110-43-0	139.98	0.00	43,748
Methyl Ethyl Ketone (MEK)	78-93-3	83.99	0.00	43,748
Methyl Isobutyl Ketone (MIBK)	108-87-9	0.00	0.00	43,748
Methyl Propyl Ketone	107-87-9	0.00	0.00	43,748
Napthalene	91-20-3	0.00	0.00	22,750
Phosphoric Acid	7664-38-2	21.87	0.00	175
Propylene Monometh Ether Acetate	108-65-6	887.22	887.22	No SQER
Toluene	108-88-3	374.31	374.31	43,748
VM and P Nathalene	8032-32-4	125.98	0.00	43,748
Xylenes (all isomers)	1330-20-7	1160.99	1160.99	43,748
Zinc Chromates	13530-65-9	0.10	0.00	175
	Totals =	5,148	2,834	

PM/PM₁₀ Emissions = 23 lbs/year

PM_{2.5} = 18 lbs/year

VOC Emissions = 2.17 tons/yr

Actual annual emissions will be calculated using annual material purchases, material composition data, filter efficiencies and transfer efficiencies for spray applied coatings. If the amount of VOCs shipped off-site as waste is quantified, this amount can be subtracted from the facility's emission inventory.

- 6.b. Spray Booth Heater. Potential annual emissions from the combustion of natural gas by this heater were calculated with the assumption that heater could operate at full rated capacity for 8,760 hours per year.

Spray Booth Heaters						
Heat Input Rating =	1.3 MMBtu/hr					
Natural Gas Geat Content =	1,020 Btu/scf (for criteria pollutant emission factors)					
Annual Fuel Consumption =	11,388 MMBtu/yr					
	Emission Factor	Emission Factor	Emissions	Emissions	Emissions	Emission Factor Source
Pollutant	lb/MMscf	lb/MMBtu	lb/hr	lb/yr	tpy	Emission Factor Source
NO _x	100	0.0980	0.13	1,116	0.56	AP-42 Sec. 1.4 (7/98)
CO	84	0.0824	0.11	938	0.47	AP-42 Sec. 1.4 (7/98)
VOC	5.5	0.0054	0.01	61	0.031	AP-42 Sec. 1.4 (7/98)
SO _x as SO ₂	0.6	0.00059	7.6E-04	6.7	0.0033	AP-42 Sec. 1.4 (7/98)
PM (total)	7.6	0.0075	0.010	85	0.042	AP-42 Sec. 1.4 (7/98)
PM ₁₀	7.6	0.0075	0.010	85	0.042	AP-42 Sec. 1.4 (7/98)
PM _{2.5}	7.6	0.0075	0.010	85	0.042	AP-42 Sec. 1.4 (7/98)
Benzene	0.0021	2.06E-06	2.7E-06	2.3E-02	1.2E-05	AP-42 Sec. 1.4 (7/98)
Formaldehyde	0.075	7.35E-05	9.6E-05	8.4E-01	4.2E-04	AP-42 Sec. 1.4 (7/98)
Greenhouse Gases	kg/MMBtu	GWP	lb/MMBtu	lb/MMscf	tpy, CO ₂ e	Emission Factor Source
CO ₂	53.02	1	116.89	120,162	666	40 CFR 98
CH ₄	0.001	21	0.046	47.59	0.26	40 CFR 98
N ₂ O	0.0001	310	0.068	70.26	0.39	40 CFR 98
Total GHG - CO ₂ e	53.0211		117.004	120,280	666	

Annual emissions must be calculated using the emission factors identified above unless new emission factors are developed through source testing.

6.c. Emissions Summary

Air Pollutant	Potential to Emit (tpy)	Project Impact (tpy)
NO _x	0.56	-0.04
CO	0.47	-0.03
VOC	2.21	No Impact
SO ₂	0.00	No Impact
PM	0.06	No Impact
PM ₁₀	0.06	No Impact
PM _{2.5}	0.05	No Impact
CO ₂ /CO ₂ e	666	-51

7. REGULATIONS AND EMISSION STANDARDS

Regulations have been established for the control of emissions of air pollutants to the ambient air. Regulations applicable to the proposed facility that have been used to evaluate the acceptability of the proposed facility and establish emission limits and control requirements include, but are not limited to, the following regulations, codes, or requirements. These items establish maximum emissions limits that could be allowed and are not to be exceeded for new or existing facilities. More stringent limits are established in this ADP consistent with implementation of Best Available Control Technology (BACT):

- 7.a. Title 40 Code of Federal Regulations (CFR) Part 63.11169 et seq. Subpart HHHHHH – "National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources" applies to several types of area sources, including sources that perform spray application of coatings to plastic or metal parts or products, or perform paint stripping using methylene chloride. Subpart HHHHHH requires training and certification of painters, the use of a paint booth utilizing a system that captures 98% of paint overspray, and use of high transfer efficiency coating equipment. This facility is a new source subject to this regulation. New sources, such as this facility, that start up after January 9, 2008 must comply with the provisions of this subpart upon startup. SWCAA has only taken delegation of this rule for title V facilities, therefore the facility must communicate directly with EPA regarding compliance demonstrations.
- 7.b. Revised Code of Washington (RCW) 70A.15.2040 empowers any activated air pollution control authority to prepare and develop a comprehensive plan or plans for the prevention, abatement and control of air pollution within its jurisdiction. An air pollution control authority may issue such orders as may be necessary to effectuate the purposes of the Washington Clean Air Act (RCW 70A.15) and enforce the same by all appropriate administrative and judicial proceedings subject to the rights of appeal as provided in Chapter 62, Laws of 1970 ex. sess. This law applies to the facility.
- 7.c. RCW 70A.15.2210 provides for the inclusion of conditions of operation as are reasonably necessary to assure the maintenance of compliance with the applicable ordinances, resolutions, rules and regulations when issuing an ADP for installation and establishment of an air contaminant source. This law applies to the facility.
- 7.d. Washington Administrative Code (WAC) 173-460 "Controls for New Sources of Toxic Air Pollutants" requires BACT for toxic air pollutants (T-BACT), identification and quantification of emissions of toxic air pollutants and demonstration of protection of human health and safety.

The facility emits TAPs; therefore, this regulation applies to the facility.

- 7.e. WAC 173-476 "Ambient Air Quality Standards" establishes ambient air quality standards for PM₁₀, PM_{2.5}, lead, SO₂, NO_x, ozone, and CO in the ambient air, which must not be exceeded. The facility emits PM₁₀, PM_{2.5}, SO_x, NO_x, and CO; therefore, certain sections of this regulation apply. The facility does not emit lead; therefore, the lead regulation section does not apply.

- 7.f. SWCAA 400-040 "General Standards for Maximum Emissions" requires all new and existing sources and emission units to meet certain performance standards with respect to Reasonably Available Control Technology (RACT), visible emissions, fallout, fugitive emissions, odors, emissions detrimental to persons or property, SO₂, concealment and masking, and fugitive dust. This regulation applies to the facility.
- 7.g. SWCAA 400-040(1) "Visible Emissions" requires that emissions of an air contaminant from any emissions unit must not exceed twenty percent opacity for more than three minutes in any one hour at the emission point, or within a reasonable distance of the emission point. This regulation applies to the facility.
- 7.h. SWCAA 400-040(2) "Fallout" requires that emissions of PM from any source must not be deposited beyond the property under direct control of the owner(s) or operator(s) of the source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited. This regulation applies to the facility.
- 7.i. SWCAA 400-040(3) "Fugitive Emissions" requires that reasonable precautions be taken to prevent the fugitive release of air contaminants to the atmosphere. This regulation applies to the facility.
- 7.j. SWCAA 400-040(4) "Odors" requires any source which generates odors that may unreasonably interfere with any other property owner's use and enjoyment of their property to use recognized good practice and procedures to reduce these odors to a reasonable minimum. This source must be managed properly to maintain compliance with this regulation. This regulation applies to the facility.
- 7.k. SWCAA 400-040(6) "Sulfur Dioxide" requires that no person is allowed to emit a gas containing in excess of 1,000 ppm of SO₂, corrected to 7% O₂ or 12% CO₂ as required by the applicable emission standard for combustion sources.

The facility emits SO₂; therefore, this regulation applies to the facility.

- 7.l. SWCAA 400-040(8) "Fugitive Dust Sources" requires that reasonable precautions be taken to prevent fugitive dust from becoming airborne, and minimize emissions. This regulation applies to the facility.
- 7.m. SWCAA 400-050 "Emission Standards for Combustion and Incineration Units" requires that all provisions of SWCAA 400-040 be met and that no person is allowed to cause or permit the emission of PM from any combustion or incineration unit in excess of 0.23 g/Nm³_{dry} (0.1 gr/dscf) of exhaust gas at standard conditions.

The facility has combustion units; therefore, this regulation applies to the facility.

- 7.n. SWCAA 400-060 "Emission Standards for General Process Units" requires that all new and existing general process units do not emit PM in excess of 0.23 g/Nm³_{dry} (0.1 gr/dscf)

of exhaust gas. The facility has general process units; therefore, this regulation applies to the facility.

- 7.o. SWCAA 400-109 "Air Discharge Permit Applications" requires that an ADP application be submitted for all new installations, modifications, changes, or alterations to process and emission control equipment consistent with the definition of "new source". Sources wishing to modify existing permit terms may submit an ADP application to request such changes. An ADP must be issued, or written confirmation of exempt status must be received, before beginning any actual construction, or implementing any other modification, change, or alteration of existing equipment, processes, or permits. This regulation applies to the facility.
- 7.p. SWCAA 400-110 "New Source Review" requires that SWCAA issue an ADP in response to an ADP application prior to establishment of the new source, emission unit, or modification. The new units meet the definition of a new source; therefore, this regulation applies to the facility.
- 7.q. SWCAA 400-111 "Requirements for Sources in a Maintenance Plan Area" requires that no approval to construct or alter an air contaminant source will be granted unless it is evidenced that:
- (1) The equipment or technology is designed and will be installed to operate without causing a violation of the applicable emission standards;
 - (2) Emissions will be minimized to the extent that the new source will not exceed emission levels or other requirements provided in the maintenance plan;
 - (3) BACT will be employed for all air contaminants to be emitted by the proposed equipment;
 - (4) The proposed equipment will not cause any ambient air quality standard to be exceeded; and
 - (5) If the proposed equipment or facility will emit any toxic air pollutant regulated under WAC 173-460, the proposed equipment and control measures will meet all the requirements of that Chapter.

The facility is located in a maintenance plan area; therefore, this regulation applies to the facility.

- 7.r. SWCAA 490 "Emission Standards and Controls for Sources Emitting Volatile Organic Compounds" establishes emission standards and control requirements for sources of VOC located in ozone nonattainment or maintenance plan areas. SWCAA 490-204 "Graphic Arts Systems" applies to printing systems including flexographic printing systems that use more than 100 tpy of VOCs as a component of ink, for the thinning of ink, cleaning of presses, press components and equipment. The permittee does not use more than 100 tpy of VOCs, therefore, the standards in this section do not apply to the permittee.

8. BACT/PSD/CAM DETERMINATIONS

The proposed equipment and control systems incorporate BACT for the types and amounts of air contaminants emitted by the processes as described below:

- 8.a. BACT Determination – Spray Booth. The proposed use of enclosed spray booths operated at the rated air flow rate, spray booths equipped with arrestors with a minimum of 98% capture efficiency, and the use of HVLP spray guns operating at maximum cap pressure of 10 psig has been determined to meet the requirements of BACT for the types and quantities of emissions from the spray booth.

Potential control measures that were not used were thermal oxidation and carbon adsorption. These control measures are not considered cost effective for a source of this size.

For the booth heater, the use of low-sulfur fuel (natural gas) and proper combustion controls meets the requirements of BACT for the types and quantities of emissions from the spray booth heater.

- 8.b. Prevention of Significant Deterioration (PSD) Applicability Determination. This permitting action will not result in a potential increase in emissions equal to or greater than the PSD thresholds. Therefore, PSD review is not applicable to this action.
- 8.c. Compliance Assurance Monitoring (CAM) Applicability Determination. CAM is not applicable to any emission unit at this facility because it is not a major source and is not required to obtain a Part 70 (Title V) permit.

9. AMBIENT IMPACT ANALYSIS

- 9.a. Criteria Air Pollutant Review. Emissions of NO_x, CO, PM, VOC (as a precursor to O₃), and SO₂ are emitted at levels where no adverse ambient air quality impact is anticipated.
- 9.b. Toxic Air Pollutant Review.
Based on the emission calculations in accordance with Section 6 for the emission units and activities described in ADP application CL-3218, none of the estimated emission rates exceed the Small Quantity Emission Rate (SQER) specified in WAC 173-460, therefore, no adverse ambient air quality impact is anticipated.

Conclusions

- 9.c. Operation of a sign manufacturing facility, as proposed in ADP application CL-3218, will not cause the ambient air quality requirements of 40 CFR 50 "National Primary and Secondary Ambient Air Quality Standards" to be violated.
- 9.d. Operation of a sign manufacturing facility, as proposed in ADP application CL-3218, will not cause the requirements of WAC 173-460 "Controls for New Sources of Toxic Air Pollutants" or WAC 173-476 "Ambient Air Quality Standards" to be violated.

- 9.e. Operation of a sign manufacturing facility, as proposed in ADP application CL-3218, will not violate emission standards for sources as established under SWCAA General Regulations Sections 400-040 "General Standards for Maximum Emissions," 400-050 "Emission Standards for Combustion and Incineration Units," and 400-060 "Emission Standards for General Process Units."

10. DISCUSSION OF APPROVAL CONDITIONS

SWCAA has made a determination to issue ADP 23-3560 in response to ADP application CL-3218. ADP 23-3560 contains approval requirements deemed necessary to assure compliance with applicable regulations and emission standards as discussed below.

- 10.a. Supersession of Previous Permits. ADP 23-3560 supersedes ADP 11-2991 in its entirety. Compliance will be determined under this ADP, not previously superseded ADPs. Existing approval conditions for units not affected by this project have been carried forward unchanged.
- 10.b. Emission Limits. Facility-wide emission limits are based on the sum of the emission limits for approved equipment calculated in Section 6 of this Technical Support Document.

Visible emissions from the prep station and spray booth exhaust systems have been limited to zero percent opacity, consistent with proper operation. Annual VOC emission limits are established based on historical usage.

- 10.c. Operational Limits and Requirements. Air pressure at the air cap of the HVLP spray guns has been limited to 10 psig. This is the maximum pressure at which the spray guns are designed to operate properly.

Consistent with the requirements of 40 CFR 63 Subpart HHHHHH and BACT, the paint booth filters must be capable of capturing at least 98% of the particulate matter from paint overspray.

- 10.d. Monitoring and Recordkeeping Requirements. ADP 23-3560 establishes monitoring and recordkeeping requirements sufficient to document compliance with applicable emission limits, ensure proper operation of approved equipment and provide for compliance with generally applicable requirements. Differential pressure readings across the spray booth filter are required daily to monitor for operational problems.
- 10.e. Reporting Requirements. ADP 23-3560 establishes general reporting requirements for annual air emissions, upset conditions and excess emissions. Specific reporting requirements are established for coating consumption and fuel consumption. Reports are to be submitted on an annual basis.

11. START-UP AND SHUTDOWN/ALTERNATIVE OPERATING SCENARIOS/POLLUTION PREVENTION

- 11.a. Start-up and Shutdown Provisions. Pursuant to SWCAA 400-081 "Start-up and Shutdown", technology-based emission standards and control technology determinations must take into consideration the physical and operational ability of a source to comply with the applicable standards during start-up or shutdown. Where it is determined that a source is not capable of achieving continuous compliance with an emission standard during start-up or shutdown, SWCAA will include appropriate emission limitations, operating parameters, or other criteria to regulate performance of the source during start-up or shutdown.

To SWCAA's knowledge, this facility can comply with all applicable standards during startup and shutdown.

- 11.b. Alternate Operating Scenarios. SWCAA conducted a review of alternate operating scenarios applicable to equipment affected by this permitting action. The permittee did not propose or identify any applicable alternate operating scenarios. Therefore, none were included in the approval conditions.
- 11.c. Pollution Prevention Measures. SWCAA conducted a review of possible pollution prevention measures for the facility. No pollution prevention measures were identified by either the permittee or SWCAA separate from or in addition to those measures required under BACT considerations. Therefore, none were included in the approval conditions.

12. EMISSION MONITORING AND TESTING

Due to the nature and small quantity of air pollutant emissions from the equipment at this facility, emission monitoring and testing requirements were not established in the permit.

13. FACILITY HISTORY

- 13.a. General History. The facility has been permitted at two different locations in the past.
- 13.b. Previous Permitting Actions. The following past permitting actions have been taken by SWCAA for this facility:

Permit	Application	Date Issued	Description
11-2991	CL-1949	8/31/2011	Approval of a paint mixing room and natural gas heated spray booth.
78-339R	Letter	10/20/1978	Modification of 78-339 to approve two stage exhaust filtering system using different filter media in the paint spray booth

Permit	Application	Date Issued	Description
78-339	CL-329	5/25/1978	Installation of an 18' by 8' by 10' paint spray booth equipped with a three state exhaust filtering system.

- 13.c. Compliance History. The following compliance issues have been identified for this facility:

NOV	Date	Violation
10751	8/19/2022	A new booth was installed without a permit and weekly pressure drop readings were not collected.

14. PUBLIC INVOLVEMENT OPPORTUNITY

- 14.a. Public Notice for ADP Application CL-3218. Public notice for ADP application CL-3218 was published on the SWCAA website for a minimum of fifteen (15) days beginning on December 14, 2022.
- 14.b. Public/Applicant Comment for ADP Application CL-3218. SWCAA did not receive specific comments, a comment period request, or any other inquiry from the public or the applicant regarding ADP application CL-3218. Therefore, no public comment period was provided for this permitting action.
- 14.c. State Environmental Policy Act. After review of the SEPA Checklist for this project, SWCAA has determined that the project does not have a probable significant impact on the environment and has issued Determination of Non-Significance 23-002. An Environmental Impact Statement is not required under RCW 43.21C.030(2)(c).