TECHNICAL SUPPORT DOCUMENT

Air Discharge Permit 23-3580
Air Discharge Permit Application CL-3213

Issued: May 11, 2023

Lightning Collision Services

SWCAA ID – 2769

Prepared By: Vannessa McClelland
Air Quality Engineer
Southwest Clean Air Agency

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ABBREVIATIONS

List of Acronyms

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

List of Units and Measures

µg/m³..... Micrograms per cubic meter
µm..... Micrometer (10^{-6} meter)
acfm ..... Actual cubic foot per minute
bhp ..... Brake horsepower
dscfm..... Dry Standard cubic foot per minute
g/dscm..... Grams per dry Standard cubic meter
gpm ..... Gallon per minute
gr/dscf ..... Grain per dry standard cubic foot
hp ..... Horsepower
hp-hr..... Horsepower-hour
kW .....Kilowatt
MMBtu .....Million British thermal unit
MMcf.....Million cubic feet
ppm .....Parts per million
ppmv.....Parts per million by volume
ppmvd.....Parts per million by volume, dry
ppmw.....Parts per million by weight
psig .....Pounds per square inch, gauge
rpm.....Revolution per minute
scfm .....Standard cubic foot per minute
tph.....Ton per hour
tpy.....Tons per year

List of Chemical Symbols, Formulas, and Pollutants

C_3H_8 ..... Propane
CH_4..... Methane
CO..... Carbon monoxide
CO_2..... Carbon dioxide
CO_2e..... Carbon dioxide equivalent
H_2S ..... Hydrogen sulfide
HAP ..... Hazardous air pollutant listed pursuant to Section 112 of the Federal Clean Air Act
HCl..... Hydrochloric acid
Hg..... Mercury
N_2O ..... Nitrous oxide
NH_3 ..... Ammonia
NO_2 ..... Nitrogen dioxide
NO_x ..... Nitrogen oxides
O_2 ..... Oxygen
O_3 .....Ozone
PM .....Particulate Matter with an aerodynamic diameter 100 µm or less
PM_{10}.....PM with an aerodynamic diameter 10 µm or less
$PM_{2.5}$ .....PM with an aerodynamic diameter 2.5 µm or less
SO_2.....Sulfur dioxide
SO_x.....Sulfur oxides
TAP.....Toxic air pollutant pursuant to Chapter 173-460 WAC
TGOC .....Total Gaseous Organic Carbon
TOC .....Total Organic Carbon
TSP .....Total Suspended Particulate
VOC.....Volatile organic compound

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:	Lightning Collision Services
Applicant Address:	10000 NE 134th Ave., Vancouver, WA 98682
Facility Name:	Lightning Collision Services
Facility Address:	13917 NE Fourth Plain Blvd., Vancouver, WA 98682
SWCAA Identification:	2769
Contact Person:	Lucia Torres Flores
Primary Process:	Autobody Shop
SIC/NAICS Code:	7532: Top, Body, and Upholstery Repair Shop and Paint Shops 811121: Automotive Body, Paint, and Interior Repair and Maintenance
Facility Classification:	Natural Minor

2. FACILITY DESCRIPTION

Lightning Collision Services (Lightning Collision) operates an automobile repair shop including a spray booth for body damage.

3. CURRENT PERMITTING ACTION

This permitting action is in response to Air Discharge Permit (ADP) application number CL-3213 dated October 12, 2022 (complete application March 1, 2023). Lightning Collision submitted ADP application CL-3213 requesting the following:

- Approval of an existing custom spray booth at an autobody shop
- Approval of an existing space heater

This is the initial permitting action for this facility.

4. PROCESS DESCRIPTION

4.a. Spray Coating Application. Lightning Collision spray coats autobody parts and accessories using HVLP spray guns and an unheated spray coating booth. Coating transfer efficiency for this equipment is estimated to be greater than 65%.

5. EQUIPMENT/ACTIVITY IDENTIFICATION

5.a. Spray Booth. The custom spray booth is a three-sided booth with a curtain covering the far side. There are eight intake filters in the ceiling and nine in the sliding door. They have one SataJet 5000 B HVLP spray gun, model 3UF5PSS6DF with a transfer efficiency of 65% and one Anest Iwata LS 400-05, model SA5233 spray gun with a transfer efficiency of 65%

Manufacturer:	Custom
Model:	N/A
Length * width * height:	28' x 16' x 8'
Rated exhaust flow:	5,000 cfm
Inlet filter area:	47 ft^2
Inlet filter manufacturer:	AFC Paint Booth 300 series Panel Filter
Inlet filter size:	20" x 20" x 2" thick, 2-ply, self-sealing, tackified polyester media
Inlet filter capture efficiency:	90% efficiency @ 5-10 micron range @ 100 fpm
Outlet filter area:	66.7 ft^2
Outlet filter manufacturer:	Viledon Fiberglass Arrestors
Outlet filter model:	HD F/G 400-400 - 20" x 20" x 2" thick
Outlet filter capture efficiency:	99.37 % overspray capture efficiency
Exhaust description:	~12" diameter vertical stack at ~15' above ground level

5.b. Space Heater. One Dayton model 3E384A, SN# Q89 65566, natural gas-fired space heater with a rated heat input of 150,000 Btu/hr.

5.c. Equipment/Activity Summary.

ID No.	Equipment/Activity	Control Equipment/Measure
1	Spray Booth	High Efficiency Paint Filters
2	Space Heating	Low 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. Spray Booth. VOC and TAP/HAP emissions are calculated using a mass balance approach, using the facilitywide usage of surface coating products. VOC and TAP/HAP

emissions for each product are determined by taking the percent VOC (or percent volatiles minus water and exempt) and percent TAP and multiplying by the usage (by weight). VOC and TAP/HAP content and product density are found in the SDS or the TDS for the product.

Example. Given a specific coating with a density of 8.5 lb/gal, a VOC content of 7.5 lb/gal, and a toluene content of 2%, assuming 10 gal/yr of usage, emissions of toluene can be determined:

10 gal/yr × 8.5 lb/gal VOC = 85 lb/yr total usage
10 gal/yr × 7.5 lb/gal VOC = 75 lb/yr VOC
85 lb/yr total usage × 2% toluene = 1.7 lb/yr toluene

The SDS may specifically list the solids content (as lb/gal or %), but if not, the general density of 35% should be used. All of the emitted PM is assumed to be PM_{10} and $PM_{2.5}$ is assumed to be 78% of the PM/PM_{10}, by weight, based on data from Version 2.0 of EPA's Particulate Matter Calculator for SCC 40200101.

A list of the products in use, the SDS or TDS, and expected annual usage was provided as part of the ADP application. SWCAA provided an inflation factor of twenty percent for future growth. It is recognized that the actual usage of products will vary. Emission estimates were based on the provided information using the procedures listed above.

Pollutant	Potential Emissions
PM/PM_{10}	0.01 tpy
$PM_{2.5}$	0.01 tpy
VOC	1.50 tpy
TAP	1.25 tpy
HAP	0.75 tpy

Pollutant	CAS Number	Category	Potential Emissions (lb/yr)	WAC 173-460 SQER (lb/yr)
Acetone	67-64-1	TAP B	360	43,748
n-Butyl Acetate	123-86-4	TAP B	320	43,748
Carbon Black	1333-86-4	TAP B	16	1,750
Cumene	98-82-8	HAP/TAP B	3	43,748
Ethyl Acetate	141-78-6	TAP B	3	43,748
Ethyl Benzene	100-41-4	HAP/TAP B	81	43,748
Heptane	142-82-5	TAP B	11	43,748
Hexamethylene Diisocyanate	822-06-0	HAP/TAP B	1	175
Isobutyl Acetate	110-19-0	TAP B	16	43,748

Pollutant	CAS Number	Category	Potential Emissions (lb/yr)	WAC 173-460 SQER (lb/yr)
3-Isocyanato-methyl 355 trimethyl-cyclohexyl isocyanate	1098-71-9	TAP B	2	175
Methanol	67-56-1	HAP/TAP B	163	43,748
Methyl Amyl Ketone	110-43-0	TAP B	189	43,748
Methyl Ethyl Ketone	78-93-3	HAP/TAP B	97	43,748
Methyl Isobutyl Ketone	108-10-1	HAP/TAP B	18	43,748
Methylcyclohexane	108-87-2	TAP B	7	43,748
Propylene glycol monomethyl ether acetate	108-65-6	HAP/TAP B	1	--
Styrene	100-42-5	HAP/TAP B	105	43,748
Toluene	108-88-3	HAP/TAP B	640	43,748
1,2,4-Trimethyl Benzene	95-63-6	TAP B	19	43,748
VN&P Naphtha	8032-32-4	TAP B	49	43,748
Xylene	1330-20-7	HAP/TAP B	379	43,748

Emissions must be determined by mass balance procedures as outlined above. Alternate emission calculation methodologies may be accepted or specified by SWCAA.

6.b. Space Heater. Emissions from the combustion of natural gas in the space heater were calculated with the assumption that the equipment will operate at full rated capacity for 8,760 hours per year. Emissions of NO_X, CO, VOC, SO_2, $PM/PM_{10}/PM_{2.5}$, formaldehyde, and benzene were calculated using emission factors from AP-42 Section 1.4 (7/98). Greenhouse gas emissions were calculated using the procedures specified in 40 CFR 98. All PM is assumed to be $PM_{10}/PM_{2.5}$.

Space Heaters

Heat Rate =	0.150	MMBtu/hr
Natural Gas Heat Value =	1,020	Btu/scf for AP-42 emission factors
Natural Gas Heat Value =	1,026	Btu/scf for 40 CFR 98 GHG emission factors
Fuel Consumption =	1.288	MMscf/yr

	Emission factor		Emissions		
Pollutant	lb/MMBtu	lb/MMscf	lb/hr	tpy	Emission Factor Source
NO_X	0.0980	100	0.015	0.064	AP-42 Sec. 1.4 (7/98)
CO	0.0824	84	0.012	0.054	AP-42 Sec. 1.4 (7/98)
VOC	0.0054	5.5	8.09E-04	0.0035	AP-42 Sec. 1.4 (7/98)
SO_X as SO_2	0.0006	0.6	8.82E-05	3.86E-04	AP-42 Sec. 1.4 (7/98)
PM	0.0075	7.6	0.0011	0.0049	AP-42 Sec. 1.4 (7/98)
PM_{10}	0.0075	7.6	0.0011	0.0049	AP-42 Sec. 1.4 (7/98)
$PM_{2.5}$	0.0075	7.6	0.0011	0.0049	AP-42 Sec. 1.4 (7/98)
Benzene [71-43-2]	2.06E-06	0.0021	3.09E-07	1.35E-06	AP-42 Sec. 1.4 (7/98)
Formaldehyde [50-00-0]	7.35E-05	0.075	1.10E-05	4.83E-05	AP-42 Sec. 1.4 (7/98)

Greenhouse Gases	kg/MMBtu	GWP	CO_2e lb/MMBtu	CO_2e lb/MMscf	tpy, CO_2e	Emission Factor Src
CO_2	53.06	1	116.98	120,019	76.9	40 CFR 98
CH_4	0.001	25	0.055	56.55	0.0	40 CFR 98
N_2O	0.0001	298	0.066	67.41	0.0	40 CFR 98
Total GHG - CO_2e			117.098	120,143	76.9	

6.c. Emissions Summary

Air Pollutant	Potential to Emit (tpy)
NO_x	0.064
CO	0.054
VOC	1.50
SO_2	0.00039
PM	0.014

Air Pollutant	Potential to Emit (tpy)
PM_{10}	0.014
$PM_{2.5}$	0.010
TAPs	1.23
HAPs	0.69

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 Permit consistent with implementation of Best Available Control Technology (BACT):

7.a. Title 40 Code of Federal Regulations (40 CFR) Subpart HHHHHH (63.11169 et seq.) "National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources" establishes standards and work practices for all area sources engaged in paint stripping operations using methylene chloride, autobody refinishing operations, or spray coating of metal or plastic parts with coatings that contain chromium, lead, manganese, nickel, or cadmium (target HAPs). This facility does not use coatings that contain target HAPs, so this regulation is not applicable.

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. 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 PM_{10}, $PM_{2.5}$, lead, SO_2, NO_x, ozone, and CO in the ambient air, which must not be exceeded. The facility emits PM_{10}, $PM_{2.5}$, 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, SO_2, 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 ppmd of SO_2, corrected to 7% O_2 or 12% CO_2 as required by the applicable emission standard for combustion sources. The facility does not emit SO_2; therefore, this regulation does not apply 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 to 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/Nm^3_{dry} (0.1 gr/dscf) of exhaust gas at standard conditions.

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/Nm^3_{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 490-205 "Surface Coating of Miscellaneous Metal Parts and Products" specifically is not applicable to automobile refinishing, therefore, the standards in this section do not apply to the permittee.

7.s. SWCAA 493-400 "Motor Vehicle Refinishing" establishes VOC content limits for motor vehicle refinishing coatings. This regulation is applicable to this facility because it paints vehicles and vehicle parts. This is a point-of-sale regulation.

8. RACT/BACT/BART/LAER/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:

BACT Determination(s)

8.a. BACT Determination – Spray Booth. The proposed use of an enclosed spray booth and spray system equipped with arrestors with a minimum of 98% capture efficiency and the use of HVLP spray guns has been determined to meet the requirements of BACT for the types and quantities of emissions from the spray booth.

8.b. BACT Determination – Natural Gas-fired Space Heater. The proposed use of low sulfur fuel (natural gas) has been determined to meet the requirements of BACT for heating the facility.

8.c. 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.d. 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 O_3), and SO_2 are emitted at levels where no adverse ambient air quality impact is anticipated.

9.b. Toxic Air Pollutant Review. The ADP limits emissions of Class A and B toxic air pollutants to below the applicable Small Quantity Emission Rates (SQER) or Acceptable Source Impact Level (ASILs) specified in WAC 173-460.

Conclusions

9.c. The spray booth, as proposed in ADP application CL-3213, 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. The spray booth, as proposed in ADP application CL-3213, 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. The spray booth as proposed in ADP application CL-3213, 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 23-3580 in response to ADP application CL-3213. ADP 23-3580 contains approval requirements deemed necessary to assure compliance with applicable regulations and emission standards as discussed below.

This is the initial permitting action for the facility.

10.a. General Basis. Approval conditions for equipment affected by this permitting action incorporate the operating schemes proposed by the applicant in ADP application CL-3213. BACT is implemented as proposed for each emission unit.

10.b. Emission Limits. Facilitywide emission limits are based on the sum of the emission limits for approved equipment calculated in Section 6 of this TSD.

Visible emissions from the spray booth exhaust systems have been limited to zero percent opacity, consistent with proper operation.

10.c. Operational Limits and Requirements. Approval conditions for the spray coating operation require the facility to minimize emissions through a combination of booth enclosure with particulate filtration, good work practices, and high transfer efficiency coating equipment.

Approval conditions require that SWCAA be notified prior to the use of new coating or finishing materials at the facility. This notification will allow SWCAA and the permittee to assess the potential adverse air quality impact of a process or material change. Changes that result in significant air quality impacts will require New Source Review prior to implementation.

10.d. Monitoring and Recordkeeping Requirements. Sufficient monitoring and recordkeeping were established to document compliance with the annual emission limits and provide for general requirements (e.g., excess emission reporting, annual emission inventory submission), and assist in the compliance assessment during on-site inspections. Records of maintenance activities and the results of periodic inspections conducted by facility personnel are required because they are valuable tools for regulatory inspectors and plant personnel. In addition, these records can be used to determine appropriate operating and maintenance requirements in a future permitting action.

Differential pressure across the spray booth filters must be recorded at least weekly to assist in evaluating whether the booth filters are operating properly. Large changes in differential pressure can indicate operational problems.

The permittee is required to record each occurrence of maintenance and repairs to applicable equipment so that SWCAA and the permittee can assure that the equipment is being maintained properly and evaluate whether emission factors remain valid.

10.e. Reporting Requirements. The permit requires reporting of the annual air emissions inventory and reporting of the data necessary to develop the inventory (material usage and disposal). Upset conditions with the potential to cause excess emissions must be reported immediately in order to qualify for relief from penalty in accordance with SWCAA 400-107 for unavoidable exceedances. In addition, prompt reporting allows for accurate investigation into the cause of the event and prevention of similar future incidents. The submittal date refers to the earlier of the date the report is delivered to SWCAA or the postmarked date if sent through the US Post Office.

The permittee is also required to notify SWCAA prior to the use of new materials at the facility that could result in emissions of toxic or hazardous air pollutants. Such notification allows SWCAA to assess the potential adverse air quality impact of a process or material change. Changes that could result in significant air quality impacts are subject to formal review prior to implementation.

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 or in addition to those measures required under BACT considerations. Therefore, none were included in the approval conditions.

12. EMISSION MONITORING AND TESTING

There are no emission monitoring or testing requirements established as part of this permitting action.

13. FACILITY HISTORY

13.a. General History. The facility has not been permitted in the past.

13.b. Compliance History. No compliance issues have been identified for this facility within the past five years.

14. PUBLIC INVOLVEMENT OPPORTUNITY

14.a. Public Notice for ADP Application CL-3213. Public notice for ADP application CL-3213 was published on the SWCAA website for a minimum of fifteen (15) days beginning on March 1, 2023.

14.b. Public/Applicant Comment for ADP Application CL-3213. SWCAA did not receive specific comments, a comment period request, or any other inquiry from the public or the applicant regarding ADP application CL-3213. 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 23-021. An Environmental Impact Statement is not required under RCW 43.21C.030(2)(c).