

February 15, 2024

Ben Ford, Body Shop Manager
Vancouver Ford Inc.
6801 NE 40th Street
Vancouver, WA 98661

RE: Final Air Discharge Permit for Spray-On Bedliner Process and Booth

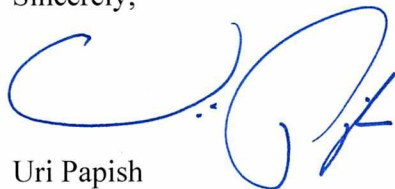
Dear Mr. Ford:

A final determination to issue Air Discharge Permit (ADP) 24-3626 has been completed for ADP Application CL-3247 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-3247 was published in the permit section of SWCAA's website on August 23, 2023. 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 24-3626 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 24-3626 may be appealed directly to the Pollution Control Hearings Board (PCHB) 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 Danny Phipps at (360) 574-3058, extension 124.

Sincerely,



Uri Papish
Executive Director

UP:edp

Enclosure: Technical Support Document and Air Discharge Permit 24-3626





**AIR DISCHARGE PERMIT
24-3626**

Issued: February 15, 2024

Vancouver Ford Inc.
6801 NE 40th Street
Vancouver, WA 98661

SWCAA ID – 647



REVIEWED BY: _____

Clinton H. Lamoreaux
Clinton Lamoreaux, 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	Vehicle Preparation Station	Process enclosure, primary and secondary fabric filtration
2	Paint Mixing Room	None
3	Paint Spray Booth and Heater	Process enclosure, high efficiency particulate filters, low sulfur fuel (natural gas) for heaters
4	Spray Liner Booth	Process enclosure, high efficiency particulate filters

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.

ADP 24-3626 supersedes ADP 07-2752 in its entirety.

Emission Limits

Req. No.	Emission Limits	Equipment/Activity ID No.						
1.	<p>Emissions from the Paint Spray Booth Heater must not exceed any of the following:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="2">Pollutant</th> </tr> </thead> <tbody> <tr> <td>Nitrogen Oxides</td> <td>0.43 tpy</td> </tr> <tr> <td>Carbon Monoxide</td> <td>0.36 tpy</td> </tr> </tbody> </table> <p>The long-term emission limits are calculated consistent with Section 6 of the Technical Support Document (TSD) for this ADP.</p>	Pollutant		Nitrogen Oxides	0.43 tpy	Carbon Monoxide	0.36 tpy	3
Pollutant								
Nitrogen Oxides	0.43 tpy							
Carbon Monoxide	0.36 tpy							
2.	VOC emissions from paint mixing, spray coating, and bed lining operations must not exceed 2.52 tons per year. Annual emissions must be calculated based on actual material consumption and material balance methodology consistent with Section 6 of the TSD for this ADP.	2-4						
3.	Visible emissions from approved equipment must not exceed zero percent (0%) opacity for more than three (3) minutes in any one-hour period as determined in accordance with SWCAA Method 9.	Facility-wide						
4.	Facility-wide emissions of toxic air pollutants (TAPs) must not exceed the applicable small quantity emission rate (SQER) identified in WAC 173-460. Combined TAP emissions must not cause applicable VOC emission limits to be exceeded.	Facility-wide						

Operating Limits and Requirements

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
5.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
6.	Operations that cause or contribute to a nuisance odor must use recognized good practice and procedures to reduce these odors to a reasonable minimum.	Facility-wide
7.	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
8.	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.	Facility-wide
9.	Exhaust air from the Paint Mixing Room, the Paint Spray Booth, and the Spray Liner Booth 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.	2-4
10.	All surface coating must be performed inside the Spray Booth, and all spray lining must be performed in the Spray Lining Booth, unless otherwise specified by SWCAA.	3-4
11.	A differential pressure gauge must be installed and maintained to measure the pressure drop across the Paint Spray Booth and Spray Liner Booth exhaust filter media.	3-4
12.	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
13.	All Paint Spray Booth and Spray Liner Booth windows and doors must remain closed during spray coating operations.	3-4
14.	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
15.	The use of chemical strippers and paint removal products containing methylene chloride is prohibited.	Facility-wide
16.	The air cap pressure for each HVLP spray gun must not exceed 10 psig measured directly by an air cap pressure gauge or indirectly by setting the compressor to a pressure that the gun manufacturer has guaranteed will meet 10 psig at the cap.	Facility-wide

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
17.	All spray painting must be performed with properly operating high transfer efficiency spray equipment including, but not limited to, spray guns with HVLP or air-assisted airless configurations.	3
18.	The Paint Spray Booth and Spray Liner Booth must be equipped with properly fitted particulate matter filters on the exhaust that are demonstrated to provide at least 98 percent capture of coating overspray as determined using ASHRAE Method 52.1 or an equivalent method approved by SWCAA, or the filters must be certified to ASHRAE MERV 14 or better. Where two or more layers of filters are used, the combined capture efficiency must be at least 98 percent, or the combined filtration must achieve a minimum MERV of 14.	3-4
19.	The Paint Spray Booth must be fired on natural gas.	3

Monitoring and Recordkeeping Requirements

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
20.	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
21.	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
22.	Excess emissions and upset conditions must be recorded for each occurrence.	Facility-wide
23.	Purchase receipts for quantities and Safety Data Sheets/Technical Data Sheets (SDS/TDS) for VOC, HAP, or TAP-containing products must be maintained at the facility in a readily accessible form.	Facility-wide
24.	Refinishing operations must be monitored and recorded as follows: (a) The number of vehicles refinished must be recorded monthly; (b) Spray coating material consumption must be recorded monthly; and (c) The quantity and type of hazardous waste disposal must be recorded monthly.	Facility-wide
25.	Paint Spray Booth operation must be monitored and recorded as follows: (a) Differential pressure across filtration media must be recorded weekly; (b) Booth heater fuel consumption must be recorded monthly; and (c) Filter changes and maintenance activities must be recorded for each occurrence.	3
26.	Spray Liner Booth operation must be monitored and recorded as follows: (a) Differential pressure across filtration media must be recorded weekly; and (b) Filter changes and maintenance activities must be recorded for each occurrence.	4

Emission Monitoring and Testing Requirements

There are no emission monitoring or testing requirements for the approved equipment cited in this ADP.

Reporting Requirements

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
27.	<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
28.	<p>Deviations from permit conditions must be reported no later than thirty (30) days after the end of the month during which the deviation is discovered.</p>	Facility-wide
29.	<p>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.</p>	Facility-wide
30.	<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 total amount of each spray coating, bed lining, and solvent material consumed; (c) The total quantity and type of hazardous waste disposed of; (d) The total amount of natural gas consumed by the Paint Spray Booth Heater; and (e) The total number of vehicles refinished. 	Facility-wide

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
31.	<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., resin, paint, solvent, etc.), the SDS and TDS, 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 lbs) 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 use of the new product would cause any emission limit or SQER 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

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.

Req. No.	General Provisions
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 ensure 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.