



**TECHNICAL SUPPORT DOCUMENT**

**Air Discharge Permit 24-3626  
Air Discharge Permit Application CL-3247**

**Issued: February 15, 2024**

**Vancouver Ford Inc.**

**SWCAA ID – 647**

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## 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	SQER .....	Small Quantity Emission Rate listed in WAC 173-460
CFR.....	Code of Federal Regulations	Standard .....	Standard conditions at a temperature of 68°F (20°C) and a pressure of 29.92 in Hg (760 mm Hg)
EPA.....	U.S. Environmental Protection Agency	SWCAA .....	Southwest Clean Air Agency
EU .....	Emission Unit	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 <sup>3</sup> .....	Micrograms per cubic meter	MMBtu .....	Million British thermal unit
µm .....	Micrometer (10 <sup>-6</sup> meter)	MMcf .....	Million cubic feet
acfm .....	Actual cubic foot per minute	ppm .....	Parts per million
dscfm.....	Dry Standard cubic foot per minute	ppmv .....	Parts per million by volume
g/dscm.....	Grams per dry Standard cubic meter	ppmvd .....	Parts per million by volume, dry
gr/dscf .....	Grain per dry standard cubic foot	ppmw .....	Parts per million by weight
		scfm .....	Standard cubic foot per minute
		tpy .....	Tons per year

*List of Chemical Symbols, Formulas, and Pollutants*

CO.....	Carbon monoxide	PM <sub>10</sub> .....	PM with an aerodynamic diameter 10 µm or less
CO <sub>2</sub> .....	Carbon dioxide	PM <sub>2.5</sub> .....	PM with an aerodynamic diameter 2.5 µm or less
CO <sub>2e</sub> .....	Carbon dioxide equivalent	SO <sub>2</sub> .....	Sulfur dioxide
HAP .....	Hazardous air pollutant listed pursuant to Section 112 of the Federal Clean Air Act	SO <sub>x</sub> .....	Sulfur oxides
NO <sub>2</sub> .....	Nitrogen dioxide	TAP.....	Toxic air pollutant pursuant to Chapter 173-460 WAC
NO <sub>x</sub> .....	Nitrogen oxides	TSP .....	Total Suspended Particulate
O <sub>2</sub> .....	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 Ford Inc.  
Applicant Address: 6801 NE 40<sup>th</sup> Street, Vancouver, WA 98661

Facility Name: Vancouver Ford Inc.  
Facility Address: 6801 NE 40<sup>th</sup> Street, Vancouver, WA 98661

SWCAA Identification: 647

Contact Person: Ben Ford, Body Shop Manager

Primary Process: Auto Body Shop  
SIC/NAICS Code: 7532: Top, Body, and Upholstery Repair  
811121: Automotive Body, Paint, and Interior Repair

Facility Latitude and Longitude: 45° 39' 00.09" N  
122° 36' 14.09" W

Facility Classification: Natural Minor

## 2. FACILITY DESCRIPTION

Vancouver Ford Inc. (Vancouver Ford) operates an auto body shop. The permittee operates a paint mixing room, a surface preparation area, a heated paint spray booth, and a spray liner booth.

## 3. CURRENT PERMITTING ACTION

This permitting action is in response to Air Discharge Permit (ADP) application number CL-3247 dated August 16, 2023. Vancouver Ford submitted ADP application CL-3247 requesting the following:

- Approval of an existing Spray Liner Booth

ADP 24-3626 will supersede Order of Approval/ADP 07-2752 in its entirety.

## 4. PROCESS DESCRIPTION

Vancouver Ford operates a single vehicle preparation station, one paint mixing room, one heated paint spray booth, and one spray liner booth. The vehicle preparation station and the paint spray booth are both vented through fabric filters to control particulate matter emissions. Paint is applied with HVLP (High Volume Low Pressure) spray guns.

## 5. EQUIPMENT/ACTIVITY IDENTIFICATION

5.a. Vehicle Preparation Station. The following details were provided:

Make:	Garmat
Model:	10505
Dimensions:	20' by 23' by 9'
Exhaust Rate:	10,600 cfm
Fan Make:	Intervent (two fans)
Fan Model:	ADZ-400L-62EX
Fan Speed:	1,050 RPM and powered by a single 10 hp motor
Primary Filter Type:	Chemco Co. FiberGlass
Primary Filter Efficiency:	96%
Primary Filter Area:	80 ft <sup>2</sup> each
Secondary Filter Type:	Viledon Model F45
Secondary Filter Efficiency:	95% for 3µm particles
Secondary Filter Area:	117 ft <sup>2</sup>
Stack Latitude/Longitude:	Not yet available

5.b. Paint Mixing Room. The following equipment details were provided:

Make:	Garmat
Model:	49935
Serial Number:	D0407E002758
Dimensions:	7'-10" wide, 12'-10" long
Exhaust Rate:	900 cfm
Stack Diameter:	12"
Date Installed:	January 2007
Stack Latitude/Longitude:	Not yet available

5.c. Paint Spray Booth. The following equipment details were provided:

Make:	Garmat
Model:	Chinook II
Dimensions:	13'-1.5" wide, 26'-9.25" long, 8'-10.5" tall
Exhaust Rate:	12,000 cfm
Filter Make/Model:	Fibair/PA21
Filter Area:	2.5" thick, 92.25 ft <sup>2</sup>
Filter Efficiency:	99.17% on 10µm particles
Stack Description:	30" at 10' above ground level
Date Installed:	January 2007
Burner Capacity:	0.997 MMBtu/hr
Burner Fuel:	Natural Gas, Direct Fired
Stack Latitude/Longitude:	Not yet available

5.d. Spray Liner Booth. The following equipment details were provided:

Location:	Accessed from outside shop
Fan Make/Model:	UL Laboratories/5V229444
Filter Make/Model:	5Bf3232 RP Arresters/ SBF3232
Filter Area:	400 ft <sup>2</sup>
Filter Efficiency:	98.54%
Booth Dimensions:	13'-5" wide, 30' long, 13' tall
Stack Height:	20' above ground level
Stack Latitude/Longitude:	Not yet available

5.e. Equipment/Activity Summary.

<b>ID No.</b>	<b>Equipment/Activity</b>	<b>Control Equipment/Measure</b>
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

## 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:

- Continuous emissions monitoring system (CEMS) data;
- 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;
- Source emissions test data (other test method); and
- Emission factors or methodology provided in this TSD.

- 6.a. Vehicle Preparation Station. PM emissions from vehicle prep activities are calculated based on an uncontrolled emission of 5 lb/vehicle, annual throughput of 1,000 vehicles, a 96% control efficiency for the primary filters and a 95% efficiency for the secondary filters. All of emitted PM is assumed to be PM<sub>10</sub>. 78% of emitted PM is assumed to be PM<sub>2.5</sub> based on data from EPA's Particulate Matter Calculator Version 2.0 for SCC 40200101.

Pollutant	Emissions Rate	Emissions
PM/PM <sub>10</sub>	0.01 lb/vehicle	10 lb/yr
PM <sub>2.5</sub>	0.0078 lb/vehicle	7.8 lb/yr

- 6.b. Paint Mixing Room and Paint Spray Booth – Coating Applications. Emissions from spray coating operations were calculated using a material balance methodology and Safety Data Sheet (SDS) information for each individual coating product. It was assumed that 100% of the volatile material from the coatings is emitted to the ambient air. Particulate matter emissions were calculated by assuming that 35% of the solids become airborne (65% transfer efficiency, HVLP spray guns), that coatings contain 50% solids by weight, and that 98% of the airborne solid material is captured with the filtration system. Potential annual emissions were calculated based on actual product usage from calendar year 2022 during which 1,268 pounds of volatile organic compounds (VOCs) were emitted, scaled to the permit limit of 5,000 pounds per year established in SWCAA 95-1763.

Pollutant	CAS #	TAP Class	HAP (Yes/No)	Emissions (lb/yr)	SQER (lb/yr)
Ethyl benzene	100-41-4	B	Yes	69	43,748
Ethylene glycol	107-21-1	B	Yes	0.348	43,748
Toluene	108-88-3	B	Yes	148	43,748
Xylenes	1330-20-7	B	Yes	128	43,748



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

<b>Paint Spray Booth Heater</b>						
Heat Rate =	0.997 MMBtu/hr					
Fuel Type =	Natural Gas					
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 =	8.562 MMscf/yr					
Pollutant	ppmvd	Emission Factor		lb/hr	tpy	Emission Factor Source
	@ 3% O <sub>2</sub>	lb/MMBtu	lb/MMscf			
NO <sub>x</sub>	80.8	0.0981	100.1	0.098	0.43	AP-42 Sec. 1.4 (7/98)
CO	111.4	0.0823	84.0	0.082	0.36	AP-42 Sec. 1.4 (7/98)
VOC		0.0054	5.5	0.0054	0.024	AP-42 Sec. 1.4 (7/98)
SO <sub>x</sub> as SO <sub>2</sub>		0.00059	0.6	0.00059	0.0026	AP-42 Sec. 1.4 (7/98)
PM		0.0075	7.6	0.007	0.033	AP-42 Sec. 1.4 (7/98)
PM <sub>10</sub>		0.0075	7.6	0.007	0.033	AP-42 Sec. 1.4 (7/98)
PM <sub>2.5</sub>		0.0075	7.6	0.007	0.033	AP-42 Sec. 1.4 (7/98)
Benzene		2.06E-06	0.0021	2.1E-06	9.0E-06	AP-42 Sec. 1.4 (7/98)
Formaldehyde		7.35E-05	0.075	7.3E-05	3.2E-04	AP-42 Sec. 1.4 (7/98)
Greenhouse Gases			CO <sub>2</sub> e	CO <sub>2</sub> e		
	kg/MMBtu	GWP	lb/MMBtu	lb/MMscf	tpy, CO <sub>2</sub> e	Emission Factor Source
CO <sub>2</sub>	53.06	1	116.98	120,019	510.8	40 CFR 98
CH <sub>4</sub>	0.001	25	0.055	56.55	0.2	40 CFR 98
N <sub>2</sub> O	0.0001	298	0.066	67.41	0.3	40 CFR 98
Total GHG - CO <sub>2</sub> e			117.098	120,143	511.4	

Emissions must be calculated by multiplying the fuel usage by the emission factors above unless new emission factors are developed through source emissions testing, or an alternative methodology is specified or approved by SWCAA.

- 6.d. Spray Liner Booth. Emissions from spray liner booth operations were calculated using a material balance methodology and SDS information for each of the spray liner products. It was assumed that 100% of the volatile material from the coatings is emitted to the ambient air. Particulate matter emissions were calculated by assuming that 30% of the solids become airborne (70% transfer efficiency, HVLP spray guns), that coatings contain 100% solids by weight, and that 98% of the airborne solid material is captured with the filtration system. Potential annual emissions were calculated based on actual product usage from calendar years 2021 and 2022.

Pollutant	CAS #	TAP Class	HAP (Yes/No)	Emissions (lb/yr)	SQER (lb/yr)
Carbon Black	1333-96-4	B	Yes	0.896	1,750
Methylene bis(phenyl isocyanate)	101-68-8	B	Yes	6.82	175
MDI	26447-40-5	B	Yes	0.83	175

6.e. Emissions Summary

Air Pollutant	Potential to Emit (tpy)	Project Impact (tpy)
NO <sub>x</sub>	0.43	N/A
CO	0.36	N/A
VOC	2.52	N/A
SO <sub>2</sub>	0.00	N/A
PM	0.14	N/A
PM <sub>10</sub>	0.14	N/A
PM <sub>2.5</sub>	0.14	N/A
HAPs/TAPs	0.18	-1.81
CO <sub>2</sub> /CO <sub>2e</sub>	511	N/A

**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. 40 CFR 60.7 "Notification and Recordkeeping" requires that notification must be submitted to SWCAA, the delegated authority, for date construction commenced, anticipated initial startup, and initial startup.
- 7.b. 40 CFR 70 "State Operating Permit Programs" requires facilities with site emissions of any regulated air pollutant greater than 100 tpy, any single hazardous air pollutant greater than 10 tpy, or any aggregate combination of hazardous air pollutants greater than 25 tpy to obtain a Title V permit the facility does not emit any criteria pollutants or HAP above any of these thresholds; therefore, this regulation does not apply to the facility.
- 7.c. 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.d. 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.e. WAC 173-401 "Operating Permit Regulation" requires all major sources and other sources as defined in WAC 173-401-300 to obtain an operating permit. This regulation is not applicable because this source is not a potential major source and does not meet the applicability criteria set forth in WAC 173-401-300. The facility does not emit any criteria pollutants or HAP above major thresholds; therefore, this regulation does not apply to the facility.
- 7.f. 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.g. WAC 173-476 "Ambient Air Quality Standards" establishes ambient air quality standards for PM<sub>10</sub>, PM<sub>2.5</sub>, lead, SO<sub>2</sub>, NO<sub>x</sub>, ozone, and CO in the ambient air, which must not be exceeded. The facility emits PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>x</sub>, NO<sub>x</sub>, and CO; therefore, certain sections of this regulation apply. The facility does not emit lead; therefore, the lead regulation section does not apply.
- 7.h. 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<sub>2</sub>, concealment and masking, and fugitive dust. This regulation applies to the facility.
- 7.i. 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.j. 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.k. 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.l. 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.m. SWCAA 400-040(6) "Sulfur Dioxide" requires that no person is allowed to emit a gas containing in excess of 1,000 ppm of SO<sub>2</sub>, corrected to 7% O<sub>2</sub> or 12% CO<sub>2</sub> as required by the applicable emission standard for combustion sources.

The facility emits SO<sub>2</sub>; therefore, this regulation applies to the facility.

- 7.n. 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.o. 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<sup>3</sup><sub>dry</sub> (0.1 gr/dscf) of exhaust gas at standard conditions.

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

- 7.p. 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<sup>3</sup><sub>dry</sub> (0.1 gr/dscf) of exhaust gas. The facility has general process units; therefore, this regulation applies to the facility.
- 7.q. 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.r. 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.s. 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.

## **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:

### *New BACT Determination*

- 8.a. BACT Determination – Spray Liner Booth. The proposed use of an enclosed spray booth operated at the rated air flow rate and equipped with arrestors with a minimum of 98% capture efficiency as determined using American Society of Heating, Ventilation and Air Conditioning (ASHRAE) standard 52.1 (or MERV 14) has been determined to meet the requirements of BACT for the types and quantities of emissions from the spray liner booth.

### *Previous BACT Determinations*

- 8.b. BACT Determination – Preparation Station. The use of high efficiency particulate matter filters and vertical atmospheric dispersion of exhaust streams has been determined to meet the requirements of BACT for preparation stations at this facility.
- 8.c. BACT Determination – Spray Coating. The use of complete enclosure (spray booth), with fabric filtration for particulate matter control, high transfer efficiency spray coating equipment ( $\geq 65\%$  transfer efficiency), and vertical atmospheric dispersion of exhaust streams has been determined to meet the requirements of BACT and T-BACT for this spray coating operation.
- 8.d. BACT Determination – Paint Mixing. The proposed use of sealed storage containers, vertical atmospheric dispersion of exhaust streams, and good work practices has been determined to meet the requirements of BACT and T-BACT for paint mixing operations at this facility.

- 8.e. 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.f. 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<sub>x</sub>, CO, PM, VOC (as a precursor to O<sub>3</sub>), and SO<sub>2</sub> 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-3247, 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 the new spray lining booth, as proposed in ADP application CL-3247, 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 the new spray lining booth, as proposed in ADP application CL-3247, 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 the new spray lining booth, as proposed in ADP application CL-3247, 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 24-3626 in response to ADP application CL-3247. ADP 24-3626 contains approval requirements deemed necessary to assure compliance with applicable regulations and emission standards as discussed below.

- 10.a. Supersession of Previous Permits. ADP 24-3626 supersedes ADP 07-2572 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 TSD. It was determined based on information submitted by Vancouver Ford that the spray liner material used will not exceed the SQER for any pollutant, therefore no additional emission limits were established as part of this permitting action.
- 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.

To minimize the local impact on ambient air quality, all new exhaust stacks must be oriented vertically and may not utilize a rain-cap or other device that interferes with vertical dispersion.

In accordance with BACT and referencing the NESHAP for "Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources" (40 cfr 63 Subpart HHHHHH), the filter media installed on the Spray Liner Booth exhaust must be demonstrated to achieve 98% capture of paint overspray.

- 10.d. Monitoring and Recordkeeping Requirements. ADP 24-3626 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. The permittee is required to record the differential pressure across the filters weekly and record filter changes and other maintenance of the spray liner booth.
- 10.e. Reporting Requirements. ADP 24-3626 establishes general reporting requirements for annual air emissions, upset conditions, and excess emissions. Specific reporting requirements are established for spray liner usage, filter differential pressure measurements, and maintenance activities. Reports are to be submitted annually.

## **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. Vancouver Ford began operation of the first spray paint booth in this location in 1988.
- 13.b. Previous Permitting Actions. The following past permitting actions have been taken by SWCAA for this facility:

Permit	Application	Date Issued	Description
07-2752	CL-1798	10/10/07	Installation of a new Paint Mixing Room and a new Spray Paint Booth.
95-1763	CL-950	6/12/95	Installation of vehicle prep station and establishment of facility-wide emission limit.
87-897	CL-610	5/22/87	Installation of Binks Rotunda downdraft Spray Booth.

- 13.c. Compliance History. The following compliance issues have been identified for this facility within the past five years:

NOV	Date	Violation
10921	6/20/23	Installation of unpermitted equipment.

This permitting action was submitted in response to this notice of violation.



**14. PUBLIC INVOLVEMENT OPPORTUNITY**

- 14.a. Public Notice for ADP Application CL-3247. Public notice for ADP application CL-3247 was published on the SWCAA website for a minimum of fifteen (15) days beginning on August 23, 2023.
- 14.b. Public/Applicant Comment for ADP Application CL-3247. SWCAA did not receive specific comments, a comment period request, or any other inquiry from the public or the applicant regarding ADP application CL-3247. 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 it is exempt from SEPA requirements pursuant to WAC 197-11-800(3) and has issued Determination of SEPA Exemption 24-005. This project only involves repair, remodeling, maintenance, or minor alteration of existing structures, equipment or facilities, and will not involve material expansions or changes in use. There is no physical change proposed in the project that would have an adverse impact on the environment beyond that which has already been evaluated under previous SEPA reviews.