



TECHNICAL SUPPORT DOCUMENT

**Air Discharge Permit 24-3636
Air Discharge Permit Application L-740**

Issued: March 21, 2024

Pomp's Tire Service

SWCAA ID – 958

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ABBREVIATIONS

List of Acronyms

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

List of Units and Measures

µg/m ³	Micrograms per cubic meter	kW	Kilowatt
µm	Micrometer (10 ⁻⁶ meter)	MMBtu	Million British thermal unit
acfm	Actual cubic foot per minute	MMcf.....	Million cubic feet
bhp	Brake horsepower	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
gpm	Gallon per minute	ppmw	Parts per million by weight
gr/dscf	Grain per dry standard cubic foot	psig	Pounds per square inch, gauge
hp	Horsepower	rpm.....	Revolution per minute
hp-hr.....	Horsepower-hour	scfm	Standard cubic foot per minute
		tph	Ton per hour
		tpy	Tons per year

List of Chemical Symbols, Formulas, and Pollutants

C ₃ H ₈	Propane	O ₃	Ozone
CH ₄	Methane	PM	Particulate Matter with an aerodynamic diameter 100 µm or less
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 ₂ e.....	Carbon dioxide equivalent	SO ₂	Sulfur dioxide
H ₂ S	Hydrogen sulfide	SO _x	Sulfur oxides
HAP	Hazardous air pollutant listed pursuant to Section 112 of the Federal Clean Air Act	TAP.....	Toxic air pollutant pursuant to Chapter 173-460 WAC
HCl.....	Hydrochloric acid	TGOC	Total Gaseous Organic Carbon
Hg.....	Mercury	TOC	Total Organic Carbon
N ₂ O	Nitrous oxide	TSP	Total Suspended Particulate
NH ₃	Ammonia	VOC.....	Volatile organic compound
NO ₂	Nitrogen dioxide		
NO _x	Nitrogen oxides		
O ₂	Oxygen		

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: Pump's Tire Service
Applicant Address: 1123 Cedar Street
Green Bay, WI 54301
Facility Name: Pump's Tire Service
Facility Address: 1283 NW State Avenue
Chehalis, WA 98532
SWCAA Identification: 958
Contact Person: Gary Estep, Plant Manager
Primary Process: Wheel Repair and Refinishing
SIC/NAICS Code: 3714 - Motor Vehicle Parts and Accessories
336390 - Other Motor Vehicle Parts Manufacturing
Facility Latitude and Longitude: 46° 40' 19.72" N
-122° 58' 26.74" W
Facility Classification: Natural Minor

2. FACILITY DESCRIPTION

Pomp's Tire Service operates a wheel refinishing facility that has been in operation since prior to 1975, in which it was originally a tire retreading shop.

3. CURRENT PERMITTING ACTION

This permitting action is in response to Air Discharge Permit (ADP) application number L-740 dated December 7, 2023. Pomp's Tire Service has changed from a tire retreading shop to a wheel refinishing shop. They submitted ADP application L-740 requesting the approval of the following:

- Burn-off oven, natural gas-fired
- Shot blasters (2) with a dust collector to control particulate matter (PM)
- Electrostatic powder coating booth (internally vented)
- Curing oven (2) – infra-red electric
- Minor tire-rebuffing
- Tire foam filling.

ADP 24-3636 will supersede Order of Approval/ADP 78-337 in its entirety.

4. PROCESS DESCRIPTION

- 4.a. Burn-off Oven. – The wheels are sent through a burn-off oven, where materials such as paint, grease, oil, varnish, and small amounts of rubber are removed.

The wheels are then loaded onto an overhead hook rail system that conveys them through the rest of the process.

- 4.b. Shot Blasting. The wheels are shot blast using the IMI specialty shot. A dust collector is used to collect emissions from the blasting booths. Shot blast emissions collected by the baghouse are collected in 55-gallon drums.
- 4.c. Powder Coating. The powder coating booth will be internally vented. It applies a fusible thermoplastic powder onto blasted wheels. The wheels are electrostatically charged as they enter the 25 ft² booth to assure the coating fully adheres to each wheel and to minimize overspray. The powder in the coating booth is fluidized in a hopper and applied using a compressed air powder gun. Most of the wheels are either coated white or black but a few other colors might be used.
- 4.d. Curing. The wheel is cured in one of two infra-red curing ovens which fuse the thermoplastic coating into a continuous finish coat of paint on the wheel.
- 4.e. Tire Repair. On-site tire repair consists of hand buffing small patch areas on tires and application of Universal Bandag Cement before applying a room temperature patch material. They also fill about 300 tires a year (using about 141 tons of fill) with foam to add weight to the tire and help with punctures.

5. EQUIPMENT/ACTIVITY IDENTIFICATION

- 5.a. Burn-off Oven. One Jackson Oven Supply model 6707 LN, SN 7293, natural gas-fired burn-off oven rated at 0.75 MMBtu/hr used to remove cured hydrocarbon materials such as paint, grease, oil, varnish, and small amounts of rubber. The unit operates from 650 °F – 800 °F. Emissions are controlled with an afterburner operated at 1,400 °F with a minimum retention time of 0.5 seconds.

Stack Diameter: 16"
Stack Height: 30' 3" above the ground

- 5.b. Shot Blast Booths and Cartridge Collector. Part of the IMI Wheel Refinishing system. Two Proline III shot blaster booths that use steel shot and grit. Emissions are controlled by the following cartridge collector:

Make: Donaldson Torit
Model: TD486
Serial Number: 2109049-1 / 14134161
Number of Bags: 9 Ultra-Web Cartridges

Cartridge Size:	7.9" diameter by 16" length
Filter Type:	Synthetic fiber, Cellulex Cartridges
Filtration Area:	540 ft ²
Design Air Flow:	1,100 acfm
Stack Diameter:	8"
Stack Height:	30' 3" above the ground

5.c. Curing Ovens (2). Part of the IMI Wheel Refinishing system. In the curing process, VOCs are emitted from the curing of the powder coating.

- IMI Infrared Curing Oven. One IMI infrared curing oven, model 2020V3, electrically powered.
- IMI Infrared Curing Oven. One IMI infrared Quick Coil curing oven gen 2, model 10-4-750QC, 10-4-1000QC, electrically powered.

5.d. Tire Repair. On-site tire repair consists of hand buffing small patch areas on tires and application of Universal Bandag Cement before applying a room temperature patch material.

5.e. Foam Fill. Injection of a two a part foam system into tires for weight and puncture protection.

5.f. Insignificant Emission Units. The following pieces of facility equipment have been determined to have insignificant emissions, and are not registered as emission units:

Electrostatic Powder Coating Booth. Part of the IMI Wheel Refinishing system. Internally vented, however the unit emits volatile organic compounds so it is still considered an emission unit. The Nordson Enco Coat Series II powder booth, model ec2001, is three-sided and measures 5'6" wide by 7'8"high by 5' deep. The booth contains two circular primary filters, 13" diameter by 36" tall, with an efficiency of 99.99%, and 2 final HEPA filters.

A Nordson Encore LT Powder Gun.

The facility expects to use a maximum of 100,000 pounds of powder coating a year.

Exhaust Flow: 15,400 acfm

5.g. Equipment/Activity Summary.

ID No.	Equipment/Activity	Control Equipment/Measure
1	Burn-off Oven - Jackson Oven Supply, Model 6707 LN	Ultra-low Sulfur Fuel (Natural Gas), Afterburner
2	Two Proline III Shot Blast Booths	Donaldson Torit TD486 Cartridge Collector

ID No.	Equipment/Activity	Control Equipment/Measure
3	Curing Ovens	None
4	Tire Repair	None
5	Foam Fill	None

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.

Nothing precludes the use, including the exclusive use of any credible evidence or information relevant to identifying or quantifying emissions if methods identified above, in the ADP, or elsewhere in this TSD have not provided adequate quantification of actual emissions.

- 6.a. Burn-off Oven. The Burn-off oven emissions are based on 8,760 hours of operation and emission factors from a single source test by General Motors Corporation, Fairfax District Facility, Kansas City, in 1995. CO_{2e} and HAP emissions from natural gas combustion are based on AP-42 Emission factors, 8,760 hours of operation, and 0.75 MMBtu/hr.

Pollutant	Emission Factors		Emissions	
	lb/MMcf	lb/hr	tpy	Source
NO _x		0.37	1.62	AP-42 § 1.4 (7/1998)
CO		1.09	4.77	AP-42 § 1.4 (7/1998)
VOC (as C ₃ H ₈)		0.09	0.39	AP-42 § 1.4 (7/1998)
SO ₂		0.01	0.044	Mass Balance [†]
PM		0.072	0.32	AP-42 § 1.4 (7/1998)
PM ₁₀		0.067	0.29	Assumed equal to PM
PM _{2.5}		0.067	0.29	Assumed equal to PM ₁₀
CO _{2e}	119,400	360.0	384.67	40 CFR 98 [‡]
benzene [71-43-2]	0.0021	6.3×10 ⁻⁶	6.8E-06	AP-42 § 1.4 (7/1998)
formaldehyde [50-00-0]	0.075	2.2×10 ⁻⁴	2.4E-04	AP-42 § 1.4 (7/1998)

Emissions must be determined using the total number of hours of operation multiplied by the emission factors above, unless new emission factors are developed through source

testing. Alternate emission calculation methodologies may be accepted or specified by SWCAA.

- 6.b. Shot Blast Booth Cartridge Collector. Emissions from the two Proline III shot blast booths are calculated based on a maximum emission concentration of 0.005 gr/dscf, a rated airflow of 900 acfm, and 8,760 hrs/yr of potential operation.

Particulate matter smaller than 2.5 microns (PM_{2.5}) emissions are assumed to be 23% of PM emissions (EPA PM Calculator Version 2.0 - SCC 30700899). Emission evaluations should be based on the most recent emission test, rated airflow, and actual hours of operation.

Blast Booth Cartridge Collector				
Rated Airflow =	1,100 cfm			
Grain Loading =	0.005 gr/dscf			
Hours of Operation =	8,760 hours per year			
	Emission		Emission Factor	
	Factor			
Pollutant	lb/hr	lb/yr	tpy	Source
Total PM/PM ₁₀	0.05	413	0.21	Engineering estimate
PM _{2.5}	0.01	95	0.047	Engineering estimate

- 6.c. Powder Booth/Curing Ovens/Tire Repair/Foam Fill – Coating Usage. 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 Technical Data Sheet 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:

$$10 \text{ gal/yr} \times 8.5 \text{ lb/gal VOC} = 85 \text{ lb/yr total usage}$$

$$10 \text{ gal/yr} \times 7.5 \text{ lb/gal VOC} = 75 \text{ lb/yr VOC}$$

$$85 \text{ lb/yr total usage} \times 2\% \text{ toluene} = 1.7 \text{ lb/yr toluene}$$

The tire repair process is not sprayed, and the foam fill material is injected into a tire. The Powder Booth is internally vented. None of these processes are expected to have significant PM emissions to the atmosphere.

The powder coating products are solid powders with no VOC content; however, some VOC emissions are expected during the curing process. Estimates of VOC emissions in the Curing Ovens during paint curing vary among the references reviewed, with the most

conservative value appearing to be 5% of coating weight referenced in the Emission Inventory Improvement Program document "Preferred and Alternative Methods for Estimating Air Emissions From Surface Coating Operation," July 2001 prepared by Eastern Research Group, Inc. for the Point Sources Committee, Emission Inventory Improvement Program.

The foam fill components, Poly-fil A and B, are injected into a tire and react inside the tire. Individual SDS show an amount of HAPs; however, those are not emitted following the curing process.

A list of the products in use, the SDS or TDS, and expected annual usage was provided. It is recognized that the actual usage of products will vary. Emission estimates were based on the provided information using the procedures listed above. Emissions are determined to be as follows:

<u>Pollutant</u>	<u>Emissions</u>
VOC	2.66 tpy
TAP	0.01 tpy
HAP	0.00 tpy

The following is a list of toxic and hazardous air pollutants that the facility was emitting at the time of the permitting action. It is understood that as products change, the constituents in a product may also change.

TAP	CAS Number	SQER (lb/yr)	Controlled Emissions (lb/yr)
Asphalt	8052-42-4	1,750	1
Carbon black	1333-86-4	1,750	15
Heptane	142-82-5	43,748	10

Actual annual emissions for applied coatings are calculated using annual material usage, SDS data, filter efficiencies (if application), and transfer efficiency (if applicable).

6.d. Emissions Summary

Air Pollutant	Potential to Emit (tpy)
NO _x	1.62
CO	4.77
VOC	3.05
SO ₂	0.044
PM	0.52
PM ₁₀	0.50
PM _{2.5}	0.34

Air Pollutant	Potential to Emit (tpy)
CO ₂ /CO _{2e}	384.67

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) 60.2000 et seq. (Subpart CCCC) "Standards of Performance for Commercial and Industrial Solid Waste Incineration Units" establishes performance standards for commercial and industrial solid waste incineration units and air curtain incinerators. Burn-off ovens are categorically exempt from this regulation, so this regulation is not applicable to this facility.
- 7.b. 40 CFR 63.11169 et seq. (Subpart HHHHHH) "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, auto body refinishing operations, or spray coating operations that coat metal or plastic parts with coatings containing target HAPs (chromium, lead, manganese, nickel, or cadmium). This facility applies spray coatings to metal parts, but none of the coatings contain target HAPs, so the regulation is not applicable to this facility.
- 7.c. 40 CFR 63.11514 et seq. (Subpart XXXXXX) "National Emissions Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories" establishes standards and work practices for dry abrasive blasting, machining, dry grinding and polishing, spray painting, and welding operations at area sources primarily engaged in one of nine selected metal fabrication and finishing source categories. This facility does not fall under one of the source categories, therefore it does not apply to this facility.
- 7.d. 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.e. 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.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 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.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, SO₂, 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 ppmvd 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.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/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.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/Nm³_{dry} (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 400-113 "Requirements for New Sources in Attainment or Nonclassifiable Areas" 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) BACT will be employed for all air contaminants to be emitted by the proposed equipment;
 - (3) The proposed equipment will not cause any ambient air quality standard to be exceeded; and
 - (4) 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 an attainment area; therefore, this regulation applies to the facility.

- 7.t. 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 states it is for facilities with potential uncontrolled emissions of 10 tons per year of VOC. This facility does not emit over 10 tons per year of VOC so this regulation does not apply.

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 – Natural Gas-fired Bake-off Oven. The proposed use of low sulfur fuel (natural gas) and a thermal oxidizer with a 1,400 °F operating temperature and 0.5 second residence time has been determined to meet the requirements of BACT for the bake-off oven.
- 8.b. BACT Determination – Cartridge Collector. The use of process enclosure (process building) and high-efficiency particulate filtration (cartridge collector) has been determined to meet the requirements of BACT for the shot blast operations at this facility.
- 8.c. BACT Determination – Coating Booth. The proposed use of a coating booth equipped with filters with a minimum of 98% capture efficiency and the use of electrostatic coating technology has been determined to meet the requirements of BACT for the types and quantities of emissions from the spray booth. The booth is also internally vented.
- 8.d. 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.e. 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. TAP Small Quantity Review. The incremental increases in TAP emissions associated with this permitting action are quantified in Section 6 of this TSD. All incremental increases in individual TAP emissions are less than the applicable small quantity emission rate (SQER) identified in WAC 173-460.

Conclusions

- 9.c. Construction and operation of the wheel refinishing facility, as proposed in ADP application L-740, 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. Construction and operation of the wheel refinishing facility, as proposed in ADP application L-740, 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 wheel refinishing facility, as proposed in ADP application L-740, 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 24-3636 in response to ADP application L-740. ADP 24-3636 contains approval requirements deemed necessary to assure compliance with applicable regulations and emission standards as discussed below.

- 10.a. Supersession of Previous Permits. ADP 24-3636 supersedes ADP 78-337 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. General Basis. Approval conditions for equipment affected by this permitting action incorporate the operating schemes proposed by the permittee in the ADP application.
- 10.c. Emission Limits. Facility-wide emission limits for approved equipment are based on the maximum potential emissions calculated in Section 6 of this TSD.

Visible emissions from the equipment have been limited to zero percent opacity, consistent with proper operation.
- 10.d. Operational Limits and Requirements. Approval conditions require that SWCAA be notified prior to the use of new coating or material 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.

Because emissions from the oven were reviewed only for the scenario where the unit is fired on natural gas, operation of the unit on other potentially higher emitting fuels was prohibited.

- 10.e. Monitoring and Recordkeeping. The ADP requires maintenance of the information necessary to determine evaporative emissions (SDS or equivalent, material purchases, hazardous waste disposal). Air quality-related complaints must be logged to better allow the investigation of any events.
- 10.f. Reporting. Specific reporting deadlines were established for each reporting requirement. 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.

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 prompt and accurate investigation into the cause of the event and the prevention of similar future incidents.

The permit requires reporting of the annual air emissions inventory and reporting of the data necessary to develop the inventory.

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

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

13. FACILITY HISTORY

- 13.a. General History. The facility originally operated a retread tire company as Tires, Inc.
- 13.b. Compliance History. A Notice of Violation was issued on August 29, 2023, to Pomp's Tire Service for operating unpermitted equipment.
- 13.c. Previous Permitting Actions. The following past permitting actions have been taken by SWCAA for this facility:

Permit	Application	Date Issued	Description
76-166	L-75	03/13/1976	Order of Prevention to install tire buffer system and B&J cyclone.
77-240	--	04/22/1977	Consent Order to remove the cyclone and install a baghouse or scrubber or to operate the cyclone not to exceed 5% opacity.
78-337	L-90	05/03/1978	Order of Approval to operate a spray booth.

14. PUBLIC INVOLVEMENT OPPORTUNITY

- 14.a. Public Notice for ADP Application L-740. Public notice for ADP application L-740 was published on the SWCAA website for a minimum of fifteen (15) days beginning on January 10, 2024.
- 14.b. Public/Applicant Comment for ADP Application L-740. SWCAA did not receive specific comments, a comment period request, or any other inquiry from the public or the applicant regarding ADP application L-740. 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 24-013. An Environmental Impact Statement is not required under RCW 43.21C.030(2)(c).