

August 7, 2024

Joshua Hutfles, Engineer
Braun Northwest, Inc.
PO Box 1204
Chehalis, WA 98532

Subject: Final Air Discharge Permit for Increase in Material Throughput

Dear Mr. Hutfles:

A final determination to issue Air Discharge Permit 24-3654 (ADP 24-3654) has been completed for Air Discharge Permit (ADP) Application L-744 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 L-744 was published in the permit section of SWCAA's internet website on June 5, 2024. 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 24-3654 and the associated Technical Support Document are available for public review in the permit section of SWCAA's internet website (<http://www.swcleanair.gov/permits/adpfinal.asp>). Original copies are enclosed for your files.

This Air Discharge Permit may be appealed directly to the Pollution Control Hearings Board (PCHB) within 30 days of receipt as provided in RCW 43.21B.

If you have any comments, or desire additional information, please contact me or Wess Safford at (360) 574-3058, extension 126.

Sincerely,



Uri Papish
Executive Director

UP:wls

Enclosure – Air Discharge Permit 24-3654 and Technical Support Document





SWCAA
Southwest Clean Air Agency


**AIR DISCHARGE PERMIT
24-3654**

Issued: August 7, 2024

Braun Northwest
150 North Star Drive, Chehalis, WA 98532

SWCAA ID - 2162

REVIEWED BY:


Clinton Lamoreaux, Chief Engineer



APPROVED BY:

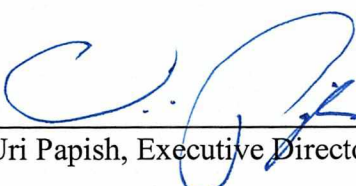

Uri Papish, Executive Director

TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
1. Equipment/Activity Identification	1
2. Approval Conditions	1
Emission Limits	1
Operating Limits and Requirements	2
Monitoring and Recordkeeping Requirements	4
Emission Monitoring and Testing Requirements	5
Reporting Requirements	5
3. General Provisions	6

1. Equipment/Activity Identification

ID No.	Equipment/Activity	Control Measure/Equipment
1	Preparation Station #1	Process Enclosure, Filter bank
2	Preparation Station #2	Process Enclosure, Filter bank
3	Preparation Station #3	Process Enclosure, Filter bank
4	Preparation Station #4	Process Enclosure, Filter bank
5	Preparation Station #5	Process Enclosure, Filter bank
6	Preparation Station #6	Process Enclosure, Filter bank
7	Spray Coating Booth #1	Process Enclosure, Wet scrubbing system
8	Spray Coating Booth #2	Process Enclosure, Wet scrubbing system
9	Spray Coating Booth #3	Process Enclosure, Wet scrubbing system
10	Spray Coating Booth #4	Process Enclosure, Filter bank
11	Paint Mixing Room	Process Enclosure
12	Welding	Process Enclosure

2. Approval Conditions

The following tables detail the specific requirements of this permit. In addition to the requirements listed below, equipment at this facility may be subject to other federal, state, and local regulations. The permit requirement number is identified in the left-hand column. The text of the permit requirement is contained in the middle column. The emission unit, equipment, or activity to which the permit requirement applies is listed in the right-hand column.

ADP 24-3654 supersedes ADP 13-3056 in its entirety.

Emission Limits

Req. No.	Emission Limits	Equipment/ Activity ID No.				
1.	With the exception of compounds listed below in Conditions 3 and 5, 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.	1-12				
2.	<div>Combined emissions from component preparation operations must not exceed:</div> <table><tr><td><u>Pollutant</u></td><td><u>Emission Limit</u></td></tr><tr><td>PM₁₀/PM_{2.5}</td><td>0.11 tpy</td></tr></table> <div>Annual emissions must be calculated based on actual vehicle production consistent with the Technical Support Document for this Air Discharge Permit.</div>	<u>Pollutant</u>	<u>Emission Limit</u>	PM ₁₀ /PM _{2.5}	0.11 tpy	1-6
<u>Pollutant</u>	<u>Emission Limit</u>					
PM ₁₀ /PM _{2.5}	0.11 tpy					

Req. No.	Emission Limits	Equipment/ Activity ID No.												
3.	<p>Combined emissions from spray coating operations must not exceed:</p> <table><tr><th>Pollutant</th><th>Emission Limit</th></tr><tr><td>VOC</td><td>24.36 tpy</td></tr><tr><td>PM₁₀/PM_{2.5}</td><td>0.57 tpy</td></tr><tr><td>t-Butyl Acetate</td><td>953.3 lb/yr</td></tr><tr><td>Chromium (VI)</td><td>0.015 lb/yr</td></tr><tr><td>Ethylbenzene</td><td>311.7 lb/yr</td></tr></table> <p>Annual emissions must be calculated using actual material throughput/consumption using material balance methodology consistent with the Technical Support Document for this Air Discharge Permit.</p>	Pollutant	Emission Limit	VOC	24.36 tpy	PM ₁₀ /PM _{2.5}	0.57 tpy	t-Butyl Acetate	953.3 lb/yr	Chromium (VI)	0.015 lb/yr	Ethylbenzene	311.7 lb/yr	7-11
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Ethylbenzene	311.7 lb/yr													
4.	<p>Combined emissions from spray booth heater operation must not exceed:</p> <table><tr><th>Pollutant</th><th>Emission Limit</th></tr><tr><td>NO_x</td><td>3.07 tpy</td></tr><tr><td>CO</td><td>2.50 tpy</td></tr><tr><td>VOC</td><td>0.19 tpy</td></tr><tr><td>SO₂</td><td>0.64 tpy</td></tr><tr><td>PM₁₀/PM_{2.5}</td><td>0.21 tpy</td></tr></table> <p>Annual emissions must be calculated from actual fuel consumption consistent with the Technical Support Document for this Air Discharge Permit.</p>	Pollutant	Emission Limit	NO _x	3.07 tpy	CO	2.50 tpy	VOC	0.19 tpy	SO ₂	0.64 tpy	PM ₁₀ /PM _{2.5}	0.21 tpy	7-10
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PM ₁₀ /PM _{2.5}	0.21 tpy													
5.	<p>Combined emissions from welding operations must not exceed:</p> <table><tr><th>Pollutant</th><th>Emission Limit</th></tr><tr><td>PM₁₀/PM_{2.5}</td><td>0.051 tpy</td></tr><tr><td>Chromium (VI)</td><td>0.00177 lb/yr</td></tr></table> <p>Annual emissions must be calculated using actual material throughput/consumption using material balance methodology consistent with the Technical Support Document for this Air Discharge Permit.</p>	Pollutant	Emission Limit	PM ₁₀ /PM _{2.5}	0.051 tpy	Chromium (VI)	0.00177 lb/yr	12						
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Chromium (VI)	0.00177 lb/yr													
6.	<p>Visible emissions from approved equipment must not exceed 0% opacity for more than 3 minutes in any one hour period as determined in accordance with SWCAA Method 9 (See Appendix A of SWCAA 400).</p>	1-12												

Operating Limits and Requirements

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
7.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
8.	The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facility-wide

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
9.	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
10.	Each pollution control device/measure must be in use whenever the associated production equipment is in operation. Control devices must be operated and maintained in accordance with the manufacturer's specifications and operated in a manner that minimizes emissions.	1-12
11.	Emission units identified in this Permit must be maintained and operated in total and continuous conformity with the conditions identified in this Permit. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this Permit, including directing the facility to cease operations until corrective action can be completed.	1-12
12.	Exhaust air from approved equipment must be discharged vertically into the ambient air above the building roof level. Rain caps that obstruct or prevent the vertical flow of exhaust gases are prohibited.	1-12
13.	Differential pressure gauges must be installed and maintained to measure the pressure drop across the filter bank of each preparation station ventilation system and Spray Coating Booth #4.	1-5, 10
14.	Preparation Stations #5-#6 must be fitted with particulate matter filters on the exhaust that are demonstrated to achieve 90 percent capture of paint overspray (or an equivalent capture efficiency for all particles with an aerodynamic diameter of 10 microns or larger). Where two layers of filters are used, the combined capture efficiency must be at least 90%.	5-6
15.	A pressure gauge(s) must be installed and maintained to continuously measure pressure in the water supply system for each spray booth water scrubber.	7-9
16.	The water supply pressure for each spray booth scrubber must be no less than 8 psig and no greater than 13 psig during booth operation.	7-9
17.	All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from SWCAA.	7-10
18.	All spray coating equipment must be operated in accordance with manufacturer's specifications, and the permittee must be able to demonstrate that the equipment is being operated in accordance with the manufacturer's specifications. The manufacturer's operating manual(s) for each piece of spray coating equipment must be maintained available on-site for review.	7-10
19.	All spray coating must be conducted within a spray booth. All spray booth windows and doors must remain closed during spray coating operations.	7-10

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
20.	Spray booth heaters must only be fired on propane or natural gas.	7-10
21.	Spray Coating Booth #4 must be fitted with exhaust filters that are demonstrated to achieve 98% capture of paint overspray. Where two layers of filters are used, the combined capture efficiency must be at least 98%.	10

Monitoring and Recordkeeping Requirements

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.																				
22.	All air quality related complaints, including odor complaints, received by the permittee and the results of any subsequent investigation or corrective action must be recorded for each occurrence.	Facility-wide																				
23.	For each product used or produced at the facility that contains VOC, HAP, or TAP, the Permittee must maintain purchase receipts for quantities, Safety Data Sheet information, and Technical Data Sheets in a readily accessible form.	Facility-wide																				
24.	With the exception of data logged by a computerized data acquisition system, each record required by this Permit must include the date and the name of the person making the record entry. If a control device or process is not operating during a specific time period, a record must be made to that effect.	1-12																				
25.	All records required by this Permit must be kept for a minimum period of no less than three years and must be maintained in a form readily available for inspection by SWCAA representatives.	1-12																				
26.	Excess emissions and upset conditions must be recorded for each occurrence.	1-12																				
27.	<div>The following information must be collected, recorded at the intervals specified below, and readily available on-site for inspection:</div> <table><tr><td>(a) Differential pressure across filter media in each preparation station</td><td>Recorded weekly</td></tr><tr><td>(b) Differential pressure across filter media in Spray Coating Booth #4</td><td>Recorded weekly</td></tr><tr><td>(c) Water scrubber supply pressure in each spray booth</td><td>Recorded weekly</td></tr><tr><td>(d) Number of vehicles produced</td><td>Recorded monthly</td></tr><tr><td>(e) Coating and solvent consumption</td><td>Recorded monthly</td></tr><tr><td>(f) Quantity/type of hazardous waste disposal</td><td>Recorded monthly</td></tr><tr><td>(g) Quantity/type of spray booth heater fuel consumption</td><td>Recorded monthly</td></tr><tr><td></td><td>Apportioned between Spraybake and Garmat spray booths</td></tr><tr><td>(h) Quantity/type of weld wire consumption</td><td>Recorded annually</td></tr><tr><td>(i) Filter changes and maintenance activities</td><td>Recorded for each occurrence</td></tr></table>	(a) Differential pressure across filter media in each preparation station	Recorded weekly	(b) Differential pressure across filter media in Spray Coating Booth #4	Recorded weekly	(c) Water scrubber supply pressure in each spray booth	Recorded weekly	(d) Number of vehicles produced	Recorded monthly	(e) Coating and solvent consumption	Recorded monthly	(f) Quantity/type of hazardous waste disposal	Recorded monthly	(g) Quantity/type of spray booth heater fuel consumption	Recorded monthly		Apportioned between Spraybake and Garmat spray booths	(h) Quantity/type of weld wire consumption	Recorded annually	(i) Filter changes and maintenance activities	Recorded for each occurrence	1-12
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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.
28.	<p>All air quality related complaints received by the permittee must be reported to SWCAA within three days of receipt. Complaint reports must include the following information:</p> <ul style="list-style-type: none"> (a) Date and time of the complaint; (b) Name of the complainant; (c) Nature of the complaint; and (d) Description of corrective action taken in response to complaint (if any). 	Facility-wide
29.	<p>A written report must be submitted to SWCAA at least 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 product, Safety Data Sheet information, 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 of product expected to be used; (d) A quantification of the change in VOC, HAP and TAP emissions from use of the product; and (e) A summary of any applicable requirement that would apply as a result of using 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. Any new product that is only to be used for testing purposes with a quantity of 5 gallons or less of usage does not need to be reported to SWCAA prior to use.</p>	Facility-wide
30.	<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 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 48 hours after discovery for emissions which the permittee wishes to claim as unavoidable pursuant to SWCAA 400-107; and (c) No later than 30 days after the end of the month of discovery for all other excess emissions. 	1-12

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
31.	The following emission-related information must be reported to SWCAA by March 15 th for the previous calendar year: (a) Number of vehicles produced; (b) Coating and solvent consumption; (c) Quantity/type of hazardous waste disposal; (d) Quantity/type of spray booth heater fuel consumption; (e) Quantity/type of weld wire consumption; and (f) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs).	1-12

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.
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.

Req. No.	General Provisions
J.	The Southwest Clean Air Agency may, in accordance with RCW 70A.15, impose such conditions as are reasonably necessary to assure 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.
K.	For the purposes of establishing if a condition of this ADP has been violated or is being violated, nothing in this ADP precludes the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test procedures or methods had been performed.