



November 6, 2024

Mr. John Dailey, Director of Maintenance
C-Tran
10600 NE 51st Circle
Vancouver, WA 98682

Subject: Final Air Discharge Permit for Expansion of Operations and Maintenance Facility

Dear Mr. Dailey:

A final determination to issue Air Discharge Permit 24-3669 (ADP 24-3669) has been completed for Air Discharge Permit (ADP) Application CL-3268 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-3268 was published in the permit section of SWCAA's internet website on March 27, 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 24-3669 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 24-3669 and Technical Support Document





SWCAA
Southwest Clean Air Agency

**AIR DISCHARGE PERMIT
24-3669**

Issued: November 6, 2024

C-Tran
2425 NE 65th Avenue, Vancouver, WA 98661

SWCAA ID - 157

REVIEWED BY:


Clinton Lamoreaux, Chief Engineer



APPROVED BY:


Uri Papish, Executive Director

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1. Equipment/Activity Identification

ID No.	Equipment/Activity	Control Measure/Equipment
1	Rohner Spray Booth (Booth – 73,000 acfm, Heater – 2.81 MMBtu/hr)	Process Enclosure, High Efficiency Filtration, Low Sulfur Fuel (Natural Gas)
2	Diesel Engine – Kohler 750 (Mitsubishi – 1,200 bhp)	EPA Tier Certification, Ultra-low sulfur diesel ($\leq 0.0015\%$ by wt)
3	Diesel Engine – Kohler 150 (John Deere – 237 bhp)	EPA Tier Certification, Ultra-low sulfur diesel ($\leq 0.0015\%$ by wt)

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 24-3669 supersedes ADP 83-712 and ADP 83-693.

Emission Limits

Req. No.	Emission Limits	Equipment/Activity ID No.										
1.	Emissions of toxic air pollutants (TAPs) from spray coating operations 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										
2.	<p>Combined emissions from spray coating operations must not exceed:</p> <table border="0"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>VOC</td> <td>1.00 tpy</td> </tr> <tr> <td>PM₁₀/PM_{2.5}</td> <td>0.005 tpy</td> </tr> </tbody> </table> <p>Annual emissions must be calculated from actual material throughput/consumption using material balance methodology consistent with the Technical Support Document for this Air Discharge Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	VOC	1.00 tpy	PM ₁₀ /PM _{2.5}	0.005 tpy	1				
<u>Pollutant</u>	<u>Emission Limit</u>											
VOC	1.00 tpy											
PM ₁₀ /PM _{2.5}	0.005 tpy											
3.	<p>Combined emissions from spray booth heater operation must not exceed:</p> <table border="0"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>NO_x</td> <td>1.21 tpy</td> </tr> <tr> <td>CO</td> <td>1.01 tpy</td> </tr> <tr> <td>VOC</td> <td>0.066 tpy</td> </tr> <tr> <td>PM₁₀/PM_{2.5}</td> <td>0.092 tpy</td> </tr> </tbody> </table> <p>Annual emissions must be calculated from actual fuel consumption consistent with the Technical Support Document for this Air Discharge Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO _x	1.21 tpy	CO	1.01 tpy	VOC	0.066 tpy	PM ₁₀ /PM _{2.5}	0.092 tpy	1
<u>Pollutant</u>	<u>Emission Limit</u>											
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PM ₁₀ /PM _{2.5}	0.092 tpy											

Req. No.	Emission Limits	Equipment/ Activity ID No.
4.	Visible emissions from spray coating operations must not exceed 0% opacity for more than 3 minutes in any one hour period as determined by a Certified Observer certified in accordance with SWCAA Method 9.	1
5.	Visible emissions from each diesel engine must not exceed 10% opacity for more than 3 minutes in any one-hour period as determined in accordance with SWCAA Method 9, except during periods of startup. For the purposes of this requirement, a startup period ends when the earlier of the following operating events occurs: <ul style="list-style-type: none"> (a) The engine has reached normal operating temperature; or (b) The engine has been operating for 15 minutes. 	2-3

Operating Limits and Requirements

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
6.	Reasonable precautions must be taken at all times to prevent and minimize fugitive emissions from plant operations.	Facility-wide
7.	The permittee must use recognized good practice and procedures to reduce odors to a reasonable minimum.	Facility-wide
8.	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.	1-3
9.	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.	1-3
10.	Exhaust from approved equipment must be discharged vertically. Any rain cap that interferes with vertical dispersion is prohibited.	1-3
11.	A differential pressure gauge must be installed and maintained to measure the pressure drop across the exhaust filter in the Rohner spray booth.	1
12.	The booth heater for the Rohner spray booth must be fired on natural gas only.	1
13.	The Rohner spray booth must be operated with properly fitted exhaust filters 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.	1
14.	Spray application of coatings containing chromium, lead, manganese, nickel, or cadmium compounds at a concentration greater than 0.1% by weight is prohibited.	1
15.	All spray booth windows and doors must remain closed during spray coating operations.	1

Req. No.	Operating Limits and Requirements	Equipment/ Activity ID No.
16.	All spray coating operations must be performed with high transfer efficiency spray gun designs such as HVLP, airless, or air assist airless. Use of conventional spray guns is prohibited.	1
17.	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.	1
18.	Operation of emergency generator engines must be limited to maintenance checks, readiness testing, and as necessary to provide emergency power.	2-3
19.	Operation of emergency generator engines for the purpose of maintenance checks and readiness testing must not exceed 100 hours per year. Operation to provide emergency power is not limited. A nonresettable time totalizer must be maintained on each engine and used to measure hours of operation.	2-3
20.	Each diesel engine must only be fired on #2 diesel or better. Fuel sulfur content must not exceed 0.0015% by weight (15 ppmw). A certification from the fuel supplier or test results using an appropriate method listed in 40 CFR 60.17 may be used to comply with this requirement.	2-3

Monitoring and Recordkeeping Requirements

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
21.	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
22.	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
23.	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.	1-3
24.	All records required by this Permit must be kept for a minimum period of no less than five years and must be maintained in a form readily available for inspection by SWCAA representatives.	1-3
25.	Excess emissions must be recorded for each occurrence.	1-3

Req. No.	Monitoring and Recordkeeping Requirements	Equipment/ Activity ID No.
26.	<p>The following information must be collected, recorded at the intervals specified below, and maintained readily available on-site for inspection:</p> <ul style="list-style-type: none"> (a) Differential pressure across exhaust filter media in the Rohner spray booth Recorded weekly (b) Spray coating material consumption Recorded monthly (c) Quantity/type of hazardous waste disposal Recorded monthly (d) Spray booth heater fuel consumption Recorded monthly (e) Emergency generator operation Recorded annually (f) Spray booth filter changes Recorded for each occurrence (g) Air quality related complaints received by the permittee and resulting corrective action Recorded for each occurrence (h) Calculated air emissions Recorded annually 	1-3

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>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
28.	<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

Req. No.	Reporting Requirements	Equipment/ Activity ID No.
29.	<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. 	1-3
30.	<p>The following emission-related information must be reported to SWCAA by March 15th for the previous calendar year:</p> <ul style="list-style-type: none"> (a) Spray coating material consumption; (c) Quantity/type of hazardous waste disposal; (d) Spray booth heater fuel consumption; (e) Emergency generator operation; and (f) Air emissions of criteria air pollutants, volatile organic compounds, toxic air pollutants (TAPs), and hazardous air pollutants (HAPs). 	1-3

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.

Req. No.	General Provisions
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 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.