



TECHNICAL SUPPORT DOCUMENT

**Air Discharge Permit ADP 24-3669
Air Discharge Permit Application CL-3268**

Issued: November 6, 2024

C-Tran

SWCAA ID - 157

Prepared By: Wess Safford
Air Quality Engineer
Southwest Clean Air Agency

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ABBREVIATIONS*List of Acronyms*

ADP	Air Discharge Permit	NSPS	New Source Performance Standard
AP-42	Compilation of Emission Factors, AP-42, 5th Edition, Volume 1, Stationary Point and Area Sources – published by EPA	PSD	Prevention of Significant Deterioration
ASIL	Acceptable Source Impact Level	RCW	Revised Code of Washington
BACT	Best available control technology	SCC	Source Classification Code
CAM	Compliance Assurance Monitoring	SDS	Safety Data Sheet
CAS#	Chemical Abstracts Service registry number	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
mfr	Manufacturer	WAC	Washington Administrative Code
NOV	Notice of Violation/		

List of Units and Measures

µm	Micrometer (10 ⁻⁶ meter)	MMBtu	Million British thermal unit
acfm	Actual cubic foot per minute	ppm	Parts per million
bhp	Brake horsepower	ppmv	Parts per million by volume
gpm	Gallon per minute	ppmvd	Parts per million by volume, dry
gr/dscf	Grain per dry standard cubic foot	ppmw	Parts per million by weight
hp	Horsepower	scfm	Standard cubic foot per minute
hp-hr	Horsepower-hour	tpy	Tons per year
kW	Kilowatt		

List of Chemical Symbols, Formulas, and Pollutants

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 _{2e}	Carbon dioxide equivalent	SO ₂	Sulfur dioxide
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
NO _x	Nitrogen oxides	VOC	Volatile organic compound
O ₂	Oxygen		
O ₃	Ozone		
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:	C-Tran
Applicant Address:	10600 NE 51 st Circle, Vancouver, Washington 98682
Facility Name:	C-Tran
Facility Address:	2425 NE 65 th Avenue, Vancouver, Washington 98661
SWCAA Identification:	157
Contact Person:	John Dailey, Director of Maintenance
Primary Process:	Public Transportation
SIC/NAICS Code:	4111 / Local & Suburban Transit 485210 / Interurban and Rural Bus Transportation
Facility Latitude and Longitude	45° 38' 19.64" N 122° 36' 10.83" W
Facility Classification:	Natural Minor

2. FACILITY DESCRIPTION

C-Tran operates the public bus system for Vancouver, Camas, Washougal, Battle Ground, Ridgefield, La Center and Yacolt. This facility is a C-Tran operations and maintenance facility located at 2425 NE 65th Avenue in Vancouver, Washington.

3. CURRENT PERMITTING ACTION

This permitting action is in response to Air Discharge Permit application number CL-3268 (ADP Application CL-3268) dated March 18, 2024. C-Tran submitted ADP Application CL-3268 requesting approval of an expanded operations and maintenance facility. The facility operates the following equipment:

- One Rohner model IDD-FP-20-16-73-CP spray booth;
- One 750 kW Kohler diesel fired emergency generator;
- One 150 kW Kohler diesel fired emergency generator;
- One Landa natural gas fired pressure washer;
- One gasoline dispensing station; and
- One central vacuum system.

The current permitting action provides approval for the maintenance depot equipment proposed in ADP Application CL-3268. ADP 24-3669 will supersede ADP 83-712 and ADP 83-693 in their entirety.

4. PROCESS DESCRIPTION

- 4.a. Spray Coating. A single commercial downdraft spray booth is used to repair and repaint buses and other transportation equipment. Spray coatings are stored and mixed in a dedicated mix room. Paint and thinner waste is stored in drums prior to shipment offsite. Spray coatings are applied using High Volume Low Pressure (HVLV) spray guns. Overspray from spray coating operations is controlled with booth enclosure and filter media installed in the booth's exhaust plenum.
- 4.b. Emergency Power Generation. Two diesel engine driven generators are used to provide electrical power at the facility during interruption of utility power.

- 4.c. Gasoline Dispensing. This facility receives unleaded gasoline from tanker trucks for storage in one underground storage tank. The gasoline storage tank is equipped with a two-point vapor balance system (Stage I vapor recovery). Gasoline is dispensed to vehicles from a single dispenser without vapor control.

5. EQUIPMENT/ACTIVITY IDENTIFICATION

- 5.a. Rohner Spray Booth (new). This unit is a fully enclosed downdraft spray booth used to repair and repaint buses and other transportation equipment. The booth is equipped with a natural gas fired heater. Overspray emissions are controlled with process enclosure and filter media.

Booth Make / Model: Rohner / IDD-FP-20-16-73-CP
 Booth Dimensions: 74' long x 20' wide x 19' 10" high
 Exhaust Rate: 73,000 acfm total
 (4) Greenheck TBI-CA-3H42-100 axial fans @ 18,250 acfm each
 Filtration Media: Air Flow Technology / AFR-1 (overall capture efficiency 98.8%)
 Booth Heater Make / Model: Titan / TA-133NG HRD HOT (s/n 16067)
 Booth Heater Rated Capacity: 2.81 MMBtu/hr
 Booth Heater Fuel Type: Natural Gas
 Exhaust Stack: (4) 42" dia stacks, vertical at 33' 6" above ground level, 7' 6" above roof level
 Location: 45°38'16.36"N 122°36'12.47"W

- 5.b. Diesel Engine – Kohler 750 Emergency Generator (new). This unit is a diesel fired generator used to provide electrical power to essential facility systems during interruptions in utility power.

Make / Model: Mitsubishi / S12A2-YY2PTAW-2 (s/n 30852)
 Power Rating: 1,200 bhp
 Fuel Type: Diesel
 Fuel Consumption: 61.4 gal/hr
 Model Year: 2023
 EPA Certification: Tier II
 NSPS/MACT Applicable: IIII / ZZZZ
 Generator Make / Model: Kohler / 750 REOMZD
 Generator Power Rating: 750 kW
 Exhaust: 12" diameter, vertical at ~9.8' above ground level
 Location: 45°38'20.31"N 122°36'16.67"W

- 5.c. Diesel Engine – Kohler 150 Emergency Generator (new). This unit is a diesel fired generator used to provide electrical power to the fueling islands during interruptions in utility power.

Make / Model: John Deere / 6068HF285K (s/n PE6068L224814)
 Power Rating: 237 bhp
 Fuel Type: Diesel
 Fuel Consumption: 12.1 gal/hr (estimated)
 Model Year: 2012
 EPA Certification: Tier 3
 NSPS/MACT Applicable: IIII / ZZZZ
 Generator Make / Model: Kohler / 150REOZJF
 Generator Power Rating: 150 kW
 Exhaust: 3" diameter, vertical at 5' above ground level
 Location: 45°38'19.20"N 122°36'6.98"W

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

Landa Pressure Washer. This unit is a natural gas fired pressure washer used to clean buses and other transportation equipment.

Make / Model: Landa / VHG4-30024A (s/n 11095410-164345)
 Rated Heat Input: 0.4 MMBtu/hr
 Fuel Type: Natural gas
 Exhaust: 8" dia at 20' above ground level
 Location: 45°38'21.35"N 122°36'6.83"W

DeVilbiss Spray Booth. This unit is a three sided side-draft spray booth used to perform small maintenance and repair activities. Overspray is controlled with process enclosure and filter media.

Gasoline Dispensing Station. C-Tran uses a single dispenser and associated underground storage tank to refuel gasoline powered transportation equipment at the facility.

Location: 45°38'19.20"N 122°36'6.98"W

Central Vacuum System. This unit is a central vacuum system used for cleaning in the maintenance bays. The system vents to a single dust collector located outside of the building.

Make/Model: Dustcontrol / VPMOD-25XL
 Exhaust: 3" dia, radial at ~8' above ground level
 Location: 45°38'16.99"N 122°36'12.09"W

- 5.e. Equipment/Activity Summary.

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

6. EMISSIONS DETERMINATION

Emissions to the ambient atmosphere from operations proposed in ADP Application CL-3268 consist of nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), particulate matter (PM), sulfur dioxide (SO₂), toxic air pollutants (TAPs), and hazardous air pollutants (HAPs).

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. Spray Coating Operations. Potential emissions from spray coating operations were calculated based on maximum proposed coating throughput using material balance methodology and 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 emission calculations assume a 65% transfer efficiency, 50% solids content, and 98% filtration efficiency. PM is assumed to be 100% PM₁₀ and 78% PM_{2.5}. Annual emissions will be calculated based on actual material usage using the same methodology.

Pollutant	Emissions (tpy)
VOC	1.00
PM/PM ₁₀	0.005
PM _{2.5}	0.004
HAP	0.49
TAP	0.81

- 6.b. Rohner Spray Booth Heater. Potential emissions from booth heater operation are calculated from a rated heat input of 2.81 MMBtu/hr, 8,760 hr/yr of operation, and emission factors are taken from EPA AP-42 §1.4 "Natural Gas Combustion" (3/98). All PM is assumed to be PM_{2.5}. Annual emissions will be calculated based on actual fuel consumption using the same methodology.

Heat Input Rating =	2.810	MMBtu/hr		
Gas Heat Content =	1,020	Btu/scf		
Fuel Consumption =	24,616	MMBtu/yr		
	Emission Factor		Emissions	
Pollutant	(lb/MMBtu)	(lb/hr)	(lb/yr)	(tpy)
NO _x	0.0980	0.28	2,413	1.21
CO	0.0824	0.23	2,027	1.01
VOC	0.0054	0.015	133	0.066
SO _x as SO ₂	5.88E-04	0.0017	14	0.0072
PM (total)	0.0075	0.021	183	0.092
PM ₁₀	0.0075	0.021	183	0.092
PM _{2.5}	0.0075	0.021	183	0.092
Benzene	2.06E-06	5.8E-06	5.1E-02	2.5E-05
Formaldehyde	7.35E-05	2.1E-04	1.8E+00	9.0E-04
CO ₂ e	117.098	329.0	2,882,438	1,441

- 6.e. Emissions Summary/Facility-wide Potential to Emit. Facility-wide potential to emit as calculated in the sections above is summarized below.

<u>Pollutant</u>	<u>Potential Emissions (tpy)</u>	<u>Project Increase (tpy)</u>
NO _x	2.45	2.45
CO	1.18	1.18
VOC	1.12	1.12
SO ₂	0.0088	0.0088
Lead	0.0	0.0
PM	0.13	0.13
PM ₁₀	0.13	0.13
PM _{2.5}	0.13	0.13
TAP	0.84	0.84
HAP	0.49	0.49
CO ₂ e	1,607	1,607

<u>Pollutant</u>	<u>CAS Number</u>	<u>Category</u>	<u>Facility-wide Emissions</u>	<u>Project Increase</u>	<u>WAC 173-460 SQER</u>
			<u>lb/yr</u>	<u>lb/yr</u>	<u>lb/yr</u>
Acetone	67-64-1	TAP	91.1	91.1	43,748
Benzene	71-43-2	HAP/TAP	0.05	0.05	20
n-Butyl Acetate	123-86-4	TAP	242.5	242.5	43,748
n-Butyl Alcohol	71-36-3	TAP	9.3	9.3	43,748
Carbon Black	1333-86-4	HAP/TAP	0.05	0.05	1,750
<i>Diesel Particulate Matter</i>	--	<i>TAP</i>	<i>64.6</i>	<i>64.6</i>	<i>0.54</i>
Diisobutyl Ketone	108-83-8	TAP	0.3	0.3	43,748
Ethyl Acetate	141-78-6	TAP	29.6	29.6	43,748
Ethylbenzene	100-41-4	HAP/TAP	32.6	32.6	65
Formaldehyde	50-00-0	HAP/TAP	1.8	1.8	20
Heptane	142-82-5	TAP	0.1	0.1	43,748
Isobutyl Acetate	110-19-0	TAP	4.1	4.1	43,748
Isobutyl Alcohol	78-83-1	TAP	9.7	9.7	43,748
Isopropyl Alcohol	67-63-0	TAP	23.1	23.1	43,748
Methanol	67-56-1	HAP/TAP	126.0	126.0	43,748
Methyl n-Amyl Ketone	110-43-0	TAP	247.2	247.2	43,748
Methyl Ethyl Ketone	78-93-3	HAP/TAP	0.7	0.7	43,748
Methyl Isobutyl Ketone	108-10-1	HAP/TAP	244.0	244.0	43,748
Octane	111-65-9	TAP	0.1	0.1	43,748
Propylene Glycol Monomethyl Ether	107-98-2	HAP/TAP	61.6	61.6	43,748

Pollutant	CAS Number	Category	Facility-wide Emissions	Project Increase	WAC 173-460 SQER
			<u>lb/yr</u>	<u>lb/yr</u>	<u>lb/yr</u>
Toluene	108-88-3	HAP/TAP	378.5	378.5	43,748
Trimethylbenzene	25551-13-7	TAP	15.1	15.1	43,748
VM&P Naphtha	8032-32-4	TAP	50.0	50.0	43,748
			<u>lb/24-hr</u>	<u>lb/24-hr</u>	<u>lb/24-hr</u>
2-Butoxyethanol	111-76-2	HAP/TAP	0.3	0.3	6.1
Cumene	98-82-8	HAP/TAP	0.001	0.001	30
Cyclohexane	110-82-7	TAP	0.02	0.02	440
Hexamethylene Diisocyanate	822-06-0	HAP/TAP	0.0003	0.0003	0.0052
Styrene	100-42-5	HAP/TAP	0.0008	0.0008	65
Xylenes	1330-20-7	HAP/TAP	0.4	0.4	16

7. REGULATIONS AND EMISSION STANDARDS

Regulations 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 regulations, codes, or requirements listed below.

- 7.a. 40 CFR 60.4200 et seq. (Subpart IIII) "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines" applies to each compression ignition (CI) internal combustion engine (ICE) that commences construction after July 11, 2005 and is manufactured after April 1, 2006, or that is modified or reconstructed after July 11, 2005. This regulation is applicable to the diesel engines that power the emergency generators.
- 7.b. 40 CFR 63 Subpart ZZZZ (63.6580 et seq.) "National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines" establishes national emission limitations and operating limitations for HAP emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This regulation is applicable to all stationary engines at the facility. The units comply by meeting the performance standards of NSPS Subpart IIII.
- 7.c. Title 40 Code of Federal Regulations (CFR) Part 63 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, autobody refinishing operations, or spray coating of metal or plastic parts with coatings that contain chromium, lead, manganese, nickel, or cadmium (target HAPs). 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.d. Title 40 CFR 63 Subpart XXXXXX "National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories" establishes standards and work practices for nine metal fabrication and finishing sources engaged in operations that use materials that contain or have the potential to emit chromium, lead, manganese, nickel, or cadmium. This facility does not fall into one of the affected categories and is not subject to the regulation.
- 7.e. 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 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.

- 7.f. 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 Air Discharge Permit for installation and establishment of an air contaminant source.
- 7.g. Washington Administrative Code (WAC) 173-460 "Controls for New Sources of Toxic Air Pollutants" requires Best Available Control Technology for toxic air pollutants (T-BACT), identification and quantification of emissions of toxic air pollutants and demonstration of protection of human health and safety.
- 7.h. WAC 173-476 "Ambient Air Quality Standards" establishes ambient air quality standards for PM₁₀, PM_{2.5}, lead, sulfur dioxide, nitrogen dioxide, ozone, and carbon monoxide in the ambient air, which shall not be exceeded.
- 7.i. 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, sulfur dioxide, concealment and masking, and fugitive dust.
- 7.j. SWCAA 400-050 "Emission Standards for Combustion and Incineration Units" requires that all provisions of SWCAA 400-040 be met and that no person shall cause or permit the emission of particulate matter from any combustion or incineration unit in excess of 0.23 grams per dry cubic meter (0.1 grains per dry standard cubic foot) of exhaust gas at standard conditions.
- 7.k. SWCAA 400-060 "Emission Standards for General Process Units" prohibits particulate matter emissions from all new and existing process units in excess of 0.1 grains per dry standard cubic foot of exhaust gas.
- 7.l. SWCAA 400-109 "Air Discharge Permit Applications" requires that an Air Discharge Permit 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 Air Discharge Permit application to request such changes. An Air Discharge Permit 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.
- 7.m. SWCAA 400-110 "New Source Review" requires that SWCAA issue an Air Discharge Permit in response to an Air Discharge Permit application prior to establishment of the new source, emission unit, or modification.
- 7.n. SWCAA 400-111 "Requirements for Sources in a Maintenance Plan Area" requires that no approval to construct or alter an air contaminant source shall 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) Best Available Control Technology 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.

8. RACT/BACT/BART/LAER/PSD/CAM DETERMINATIONS

The proposed equipment and control systems incorporate Best Available Control Technology (BACT) for the types and amounts of air contaminants emitted by the processes as described below:

New BACT Determinations

- 8.a. BACT Determination – Spray Coating. The use of complete enclosure (spray booth), high efficiency particulate matter filtration, high transfer efficiency spray coating equipment, and vertical atmospheric dispersion of exhaust streams has been determined to meet the requirements of BACT for spray coating at this facility.
- 8.b. BACT Determination – Spray Booth Heater. The use of combustion equipment that fires low sulfur fuel (natural gas) and limits visible emissions to 0% opacity or less has been determined to meet the requirements of BACT for booth heaters at this facility.
- 8.c. BACT Determination – Emergency Generator. The use of a modern diesel engine design, limited hours of operation (testing, maintenance, and emergency use only), and ultra-low sulfur distillate fuel (less than 0.0015% sulfur by weight) has been determined to meet the requirements of BACT for emergency generators at this facility.

Other Determinations

- 8.d. Prevention of Significant Deterioration (PSD) Applicability Determination. The potential to emit of this facility is less than applicable PSD applicability thresholds. Likewise, 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 permit.

9. AMBIENT IMPACT ANALYSIS

- 9.a. TAP Small Quantity Review. The incremental increases in TAP emissions associated with this permitting action are quantified in Section 6 of this Technical Support Document. All incremental increases in individual TAP emissions are less than the applicable small quantity emission rate (SQER) identified in WAC 173-460 with the exception of diesel particulate matter (DPM). Consistent with WAC 173-400-930, emergency engine installations with less than 2,000 horsepower aggregate capacity are presumed to comply with applicable standards.

Conclusions

- 9.b. Expansion of the operations and maintenance facility, as proposed in ADP Application CL-3268, will not cause the ambient air quality requirements of Title 40 Code of Federal Regulations (CFR) Part 50 "National Primary and Secondary Ambient Air Quality Standards" to be violated.
- 9.c. Expansion of the operations and maintenance facility, as proposed in ADP Application CL-3268, 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.d. Expansion of the operations and maintenance facility, as proposed in ADP Application CL-3268, will not cause a violation of 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 24-3669 in response to ADP Application CL-3268. ADP 24-3669 contains approval requirements deemed necessary to assure compliance with applicable regulations and emission standards as discussed below.

- 10.a. Supersession of Previous Permits. ADP 24-3669 supersedes ADP 83-712 and ADP 83-693 in their entirety.
- 10.b. General Basis. Permit requirements for equipment affected by this permitting action incorporate the operating schemes proposed by the applicant in ADP Application CL-3268. Permit requirements established by this action are intended to implement BACT, minimize emissions, and assure compliance with applicable requirements on a continuous basis. Emission limits for approved equipment are based on the maximum potential emissions calculated in Section 6 of this Technical Support Document.
- 10.c. Monitoring and Recordkeeping Requirements. ADP 24-3669 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. Specific monitoring requirements are established for coating consumption, heater fuel consumption, and engine operation.
- 10.d. Reporting Requirements. ADP 24-3669 establishes general reporting requirements for annual air emissions, upset conditions and excess emissions. Specific reporting requirements are established for coating consumption, heater fuel consumption, and engine operation. Reports are to be submitted on an annual basis.
- 10.e. Spray Coating. Visible emissions from the spray booth exhaust is limited to zero percent opacity, consistent with proper operation. The permittee is required to use high transfer efficiency spray equipment, such as HVLP or airless designs. Permit requirements require that SWCAA be notified prior to the use of new coating or finishing materials 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.
- 10.f. Emergency Generators. Permit requirements for this unit include operational limitations (≤ 100 hr/yr testing and maintenance) and the use of ultra-low sulfur diesel ($\leq 0.0015\%$ S by weight). A visible emission limit of 10% opacity has been established consistent with proper operation of the diesel engine. Due to technical limitations of the diesel engine, the opacity limit does not apply during periods of start-up and shutdown. Annual operation is monitored with an integral hourmeter.

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 shall 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 shall include appropriate emission limitations, operating parameters, or other criteria to regulate performance of the source during start-up or shutdown.

Emergency Generator. Visible emissions from the diesel engine driven generator are limited to 10% opacity or less during normal operation. However, the engine is not capable of reliably limiting visible emissions to less than 10% opacity until the engine achieves normal operating temperature. Therefore, the opacity limit does not apply to the generator exhaust during start-up periods.

- 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 permit requirements.

- 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 from those measures required under BACT considerations. Therefore, none were included in the permit requirements.

12. EMISSION MONITORING AND TESTING

There are no formal emission monitoring or testing requirements for this facility.

13. FACILITY HISTORY

- 13.a. Previous Permitting Actions. SWCAA has previously issued the following Permits for this facility:

<u>Permit Number</u>	<u>Application Number</u>	<u>Date</u>	<u>Purpose</u>
83-712	CL-499R	10/17/1983	Installation of new equipment in support of an operations and maintenance facility.
83-693	CL-499	8/8/1983	Installation of new equipment to establish an operations and maintenance facility.

- 13.b. Compliance History.

<u>Date</u>	<u>NOV Number</u>	<u>Violation</u>
3/5/2024	11043	Installation and operation of unpermitted equipment.

14. PUBLIC INVOLVEMENT OPPORTUNITY

- 14.a. Public Notice for ADP Application CL-3268. Public notice for ADP Application CL-3268 was published on the SWCAA internet website for a minimum of (15) days beginning on March 27, 2024.
- 14.b. Public/Applicant Comment for ADP Application CL-3268. SWCAA did not receive specific comments, a comment period request or any other inquiry from the public regarding this ADP application. Therefore, no public comment period was provided for this permitting action.
- 14.c. State Environmental Policy Act. The City of Vancouver issued a Determination of Nonsignificance (DNS) for redevelopment of the existing C-Tran maintenance facility at 2425 NE 65th Avenue in Vancouver, Washington on October 17, 2019 (PRJ-162928/LUP-75937).