TECHNICAL SUPPORT DOCUMENT

Air Discharge Permit 25-3687
Air Discharge Permit Application CL-3286

Issued: February 26, 2025

Elite Collision Center

SWCAA ID – 2151

Prepared By: Abraham Apfel
Air Quality Engineer I
Southwest Clean Air Agency

TABLE OF CONTENTS

ABBREVIATIONS

List of Acronyms

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

List of Units and Measures

µg/m³..... Micrograms per cubic meter
µm..... Micrometer (10^{-6} meter)
acfm ..... Actual cubic foot per minute
dscfm..... Dry Standard cubic foot per minute
g/dscm..... Grams per dry Standard cubic meter
gr/dscf ..... Grain per dry standard cubic foot
hp ..... Horsepower
hp-hr..... Horsepower-hour
kW..... Kilowatt
MMBtu .....Million British thermal unit
MMcf.....Million cubic feet
ppm.....Parts per million
ppmv.....Parts per million by volume
ppmvd.....Parts per million by volume, dry
ppmw.....Parts per million by weight
scfm .....Standard cubic foot per minute
tph.....Ton per hour
tpy.....Tons per year

List of Chemical Symbols, Formulas, and Pollutants

C_3H_8 ..... Propane
CH_4..... Methane
CO..... Carbon monoxide
CO_2..... Carbon dioxide
CO_2e..... Carbon dioxide equivalent
H_2S ..... Hydrogen sulfide
HAP ..... Hazardous air pollutant listed pursuant to Section 112 of the Federal Clean Air Act
NO_2 ..... Nitrogen dioxide
NO_x ..... Nitrogen oxides
O_2 ..... Oxygen
O_3 ..... Ozone
PM .....Particulate Matter with an aerodynamic diameter 100 µm or less
PM_{10}.....PM with an aerodynamic diameter 10 µm or less
$PM_{2.5}$ .....PM with an aerodynamic diameter 2.5 µm or less
SO_2.....Sulfur dioxide
SO_x.....Sulfur oxides
TAP.....Toxic air pollutant pursuant to Chapter 173-460 WAC
TSP .....Total Suspended Particulate
VOC.....Volatile organic compound

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:	Elite Collision Center
Applicant Address:	1619 W. Main Street, Battle Ground, WA 98604
Facility Name:	Elite Collision Center
Facility Address:	1619 W. Main Street, Battle Ground, WA 98604
SWCAA Identification:	2151
Contact Person:	Kevin Morse, Owner
Primary Process:	Automotive refinishing operation
SIC/NAICS Code:	7532: Top, Body, and Upholstery Repair Shops and Paint Shops 811121: Automotive Body, Paint, and Interior Repair and Maintenance
Facility Latitude and Longitude:	45°46'49.00"N 122°33'17.38"W
Facility Classification:	Natural Minor

2. FACILITY DESCRIPTION

Elite Collision Center (Elite Collision) is an automotive refinishing operation located in Battle Ground, Washington. Elite Collision is a commercial business open to the public.

3. CURRENT PERMITTING ACTION

This permitting action is in response to Air Discharge Permit (ADP) application number CL-3286 dated January 30, 2025. Elite Collision Center submitted ADP application CL-3286 requesting the following:

- Removal of spray booth water scrubber
- Addition of spray booth dry filter media Superior Fibers PA-15

ADP 25-3687 will supersede ADP 02-2444 in its entirety.

4. PROCESS DESCRIPTION

4.a. Vehicle Preparation. Vehicles undergo a preparation process prior to refinishing. This process includes bodywork, installation of new body parts, surface filling, and surface sanding/cleaning. This process is performed in one of two stations in the vehicle preparation area (prep area). The proposed ventilation equipment collects dust and fumes released during the preparation process, and exhausts vertically outside of the building.

4.b. Spray Coating Application. Subsequent to preparation, vehicles are completely or partially refinished with various types of automotive coatings. Automotive coatings used at the facility are mixed in a separate mixing room with a dedicated exhaust fan. All spray coating is performed inside a single spray coating booth. Overspray and fumes generated during spray coating are captured by the booth and exhausted vertically outside of the building. Spray coatings are applied using SataJet NR2000 model 61150 and Sharpe model 5913 spray guns. These spray guns are high volume/low pressure (HVLP) designs with a rated transfer efficiency of 60%. The spray coating booth is equipped with a natural gas fired booth heater, and has a bake cycle to cure applied coatings. The spray booth is capable of recirculating up to 85% of the rated airflow during the bake cycle. Maximum operating temperature during the bake cycle is 180º F.

5. EQUIPMENT/ACTIVITY IDENTIFICATION

5.a. Prep Area Ventilation System (*existing*). The prep ventilation system is connected to two prep stations. Each prep station is indoors but not otherwise enclosed. Each prep station has a dedicated exhaust plenum with associated filter bank. Emissions from each plenum are combined and then emitted through one stack on the roof.

Manufacturer:	Spraybake
Model:	EX-24
Rated Exhaust Flow:	10,000 acfm combined
Outlet Filter Manufacturer:	Superior Glass Fibers
Outlet Filter Model:	14AG Premium Grade
Outlet Filter Area:	12 ft^2 each
Outlet Filter Thickness:	2.5"
Outlet Filter Capture Efficiency:	96.5%
Exhaust Description:	30" diameter, 26' above ground, 6' above roof

5.b. Spray Booth (*modified*). A downdraft spray coating booth equipped with a natural gas fired booth heater. The following information was available.

Manufacturer:	Spraybake
Model:	1000 Series
Size:	27' L x 14' W x 10' H
Rated Exhaust Flow:	11,000 acfm
Outlet Filter Manufacturer:	Superior Glass Fibers
Outlet Filter Model:	PA-15
Individual Outlet Filter Area:	20" x 20"
Outlet Filter Thickness:	2.5"
Outlet Filter Capture Efficiency:	98%
Heater Make:	Spraybake
Heater Rated Input:	0.75 MMBtu/hr
Exhaust Description:	30" diameter, 26' above ground, 6' above roof

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

- Mixing Booth (Existing). The following information was provided for the mixing booth

Manufacturer:	Spraybake
Rated Exhaust Flow:	1,110 acfm
Exhaust Description:	6" diameter, 26' above ground, 6' above roof

5.d. Equipment/Activity Summary.

ID No.	Equipment/Activity	Control Equipment/Measure
1	Prep Area Ventilation System, Spraybake EX-24	Filter bank – high efficiency filter media
2	Spray Booth, Spraybake 1000 Series	Filter bank – high efficiency filter media Ultra-low Sulfur Fuel (Natural Gas)
3	Mixing Booth Spraybake	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:
(a) Continuous emissions monitoring system (CEMS) data;
(b) 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;
(c) Source emissions test data (other test method); and
(d) 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. Prep Area Ventilation System: Particulate matter emissions from vehicle preparation activities are calculated based on a throughput of 572 automobiles per year, an average of 5 pounds of solids removed from each vehicle during preparation, and a particulate filter arrestance efficiency of 96.5%. Potential emissions are calculated to be 0.05 tons of per year of PM_{10}.

Vehicle Prep Emissions		
Number of cars:	572	
PM emission factor:	5	lbs/car
Filter efficiency:	0.965	% by wt
PM/PM10 Emissions:	**0.050**	**tons**

6.b. Spray Booth. VOC and TAP/HAP emissions are calculated using a mass balance approach, using the facility-wide 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 gal/yr × 8.5 lb/gal = 85 lb/yr total usage
10 gal/yr × 7.5 lb/gal VOC = 75 lb/yr VOC
85 lb/yr total usage × 2% toluene = 1.7 lb/yr toluene

The SDS may specifically list the solids content (as lb/gal or %), but if not, the solids content can be inferred by taking the total density of the product minus the total VOC content of the product (this method provides a conservative maximum). Using the solids content of each product, the particulate (PM and PM_{10}) emissions can be determined assuming a 60% transfer efficiency by using high volume low pressure (HVLP) guns, and the control efficiency of the filter media. All of the emitted PM is assumed to be PM_{10} and $PM_{2.5}$ is assumed to be 78% of the PM/PM_{10}, by weight, based on data from Version 2.0 of EPA's Particulate Matter Calculator for SCC 40200101.

Example. Given 10 gal/yr usage of a coating with a density of 7.1 lb/gal with 20% solids and assuming a transfer efficiency of 60% with filter arrestance of 98%, emissions of PM_{10} and $PM_{2.5}$ can be determined:

10 gal/yr × 7.1 lb/gal × 20% × (100% − 60%) × (100% − 98%) = 0.11 lb/yr PM_{10}
0.11 lb/yr PM_{10} × 78% = 0.09 lb/yr $PM_{2.5}$

A list of the products in use, the SDS or TDS, was collected from the 2023 emissions inventory. It is recognized that the actual usage of products will vary. To account for business expansion, the PTE was calculated by multiplying each usage by 1.5.

Potential emissions are determined to be as follows:

Pollutant	Emissions
VOC	0.61 tpy
PM/PM_{10}	0.08 tpy
TAP (combined)	0.36 tpy
HAP (combined)	0.20 tpy

The PTE emission limits for VOC, TAP, and HAP were kept from ADP 02-2444. This permit modification only affects PM emissions.

6.c. Spray Booth Heater. Potential annual emissions from the combustion of natural gas in the booth heater were calculated with the assumption that the equipment will operate at full rated capacity for 8,760 hours per year. Emissions of NO_X, CO, VOC, SO_2, $PM/PM_{10}/PM_{2.5}$, formaldehyde, and benzene were calculated using emission factors from AP-42 Section 1.4 (7/98). Greenhouse gas emissions were calculated using the procedures specified in 40 CFR 98. All PM is assumed to be $PM_{10}/PM_{2.5}$.

Spray Booth Heater							
Combined Heat Input Rating =		0.750	MMBtu/hr				
Natural Gas Geat Content =		1,020	Btu/scf (for criteria pollutant emission factors)				
Natural Gas Heat Content =		1,028	Btu/scf (for 40 CFR 98 GHG emission factors)				
Annual Fuel Consumption =		6,570	MMBtu/yr				
Therms =		65,700	Therms				
	Emission Factor	Emissions	Emissions	Emission	Emissions		
Pollutant	lb/MMBtu	lb/hr	lb/yr	lb/therm	tpy	Emission Factor Source	
NO_X	0.0980	0.07	644	0.010	0.32	AP-42 Sec. 1.4 (7/98)	
CO	0.0824	0.062	541	0.008	0.27	AP-42 Sec. 1.4 (7/98)	
VOC	0.0054	0.004	35	0.001	0.02	AP-42 Sec. 1.4 (7/98)	
SO_X as SO_2	0.0006	4.4E-04	4	0.000	0.002	AP-42 Sec. 1.4 (7/98)	
PM (total)	0.0075	0.006	49	0.001	0.02	AP-42 Sec. 1.4 (7/98)	
PM_{10}	0.0075	0.006	49	0.001	0.02	AP-42 Sec. 1.4 (7/98)	
$PM_{2.5}$	0.0075	0.006	49	0.001	0.02	AP-42 Sec. 1.4 (7/98)	
							Emission Factor
Greenhouse Gases	kg/MMBtu	GWP	lb/MMBtu		lb/MMscf	tpy, CO_2e	Source
CO_2	53.06	1	116.98		120,253	384	40 CFR 98
CH_4	0.001	25	0.055		56.66	0.18	40 CFR 98
N_2O	0.0001	298	0.066		67.54	0.22	40 CFR 98
Total GHG - CO_2e	53.0611		117.098		120,377	385	

6.d. Emissions Summary

Air Pollutant	Potential to Emit (tpy)	Project Impact (tpy)
NO_x	0.32	+0.00
CO	0.27	+0.00
VOC	1.32	+0.00
SO_2	0.002	+0.00
Lead	0.00	+0.00
PM	0.08	-0.02
PM_{10}	0.08	-0.02
$PM_{2.5}$	0.02	+0.00
CO_2/CO_2e	385	+0.00
TAP	1.35	+0.00
HAP	0.55	+0.00

TAP	CAS Number	SQER (lb/yr)	Averaging Period	Controlled Emissions (lb/yr)
Methanol	67-56-1	43748	Year	181
Isopropanol	67-63-0	43,748	Year	63.5
Acetone	67-64-1	43,748	Year	99.7
n-Propanol	71-23-8	43,748	Year	2.38
1,2,4-Trimethylbenzene	95-63-6	4.4	24-hr	33.1
Ethylbenzene	100-41-4	65	Year	13.2
Propylene glycol monomethyl ether	107-98-2	43,748	Year	14.2
Methyl Isobutyl Ketone	108-10-1	43,748	Year	10.2
Toluene	108-88-3	43,748	Year	136
Methyl Amyl Ketone	110-43-0	6.1	24-hr	5.80
2-butoxyethanol	111-76-2	43,748	Year	0.00
2-Butoxyethyl Acetate	112-07-2	17,500	Year	14.61
n-Butyl Acetate	123-86-4	43,748	Year	93.7
Xylene	1330-20-7	43,748	Year	41.7
Carbon Black	1333-86-4	1,750	Year	3.44
Aluminum	7429-90-5	5,250	Year	0.79

7. REGULATIONS AND EMISSION STANDARDS

Regulations have been established for the control of emissions of air pollutants to the ambient air. Regulations applicable to the proposed facility that have been used to evaluate the acceptability of the proposed facility and establish emission limits and control requirements include, but are not limited to, the following regulations, codes, or requirements. These items establish maximum emissions limits that could be allowed and are not to be exceeded for new or existing facilities. More stringent limits are established in this Permit consistent with implementation of Best Available Control Technology (BACT):

7.a. 40 Code of Federal Regulations (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.b. 40 Code of Federal Regulations (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.c. Revised Code of Washington (RCW) 70A.15.2040 empowers any activated air pollution control authority to prepare and develop a comprehensive plan or plans for the prevention, abatement and control of air pollution within its jurisdiction. An air pollution control authority may issue such orders as may be necessary to effectuate the purposes of the Washington Clean Air Act (RCW 70A.15) and enforce the same by all appropriate administrative and judicial proceedings subject to the rights of appeal as provided in Chapter 62, Laws of 1970 ex. sess. This law applies to the facility.

7.d. RCW 70A.15.2210 provides for the inclusion of conditions of operation as are reasonably necessary to assure the maintenance of compliance with the applicable ordinances, resolutions, rules and regulations when issuing an ADP for installation and establishment of an air contaminant source. This law applies to the facility.

7.e. WAC 173-460 "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.f. WAC 173-476 "Ambient Air Quality Standards" establishes ambient air quality standards for PM_{10}, $PM_{2.5}$, lead, SO_2, NO_x, ozone, and CO in the ambient air, which must not be exceeded. The facility emits PM_{10}, $PM_{2.5}$, 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.g. SWCAA 400-040 "General Standards for Maximum Emissions" requires all new and existing sources and emission units to meet certain performance standards with respect to Reasonably Available Control Technology (RACT), visible emissions, fallout, fugitive emissions, odors, emissions detrimental to persons or property, SO_2, concealment and masking, and fugitive dust. This regulation applies to the facility.

7.h. 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.i. 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.j. 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.k. 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.l. SWCAA 400-040(6) "Sulfur Dioxide" requires that no person is allowed to emit a gas containing in excess of 1,000 ppmd of SO_2, corrected to 7% O_2 or 12% CO_2 as required by the applicable emission standard for combustion sources. The facility emits SO_2; therefore, this regulation applies to the facility.

7.m. 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.n. SWCAA 400-050 "Emission Standards for Combustion and Incineration Units" requires that all provisions of SWCAA 400-040 be met, and that no person is allowed to cause or permit the emission of PM from any combustion or incineration unit in excess of 0.23 g/Nm^3_{dry} (0.1 gr/dscf) of exhaust gas at standard conditions. The facility has combustion units; therefore, this regulation applies to the facility.

7.o. SWCAA 400-060 "Emission Standards for General Process Units" requires that all new and existing general process units do not emit PM in excess of 0.23 g/Nm^3_{dry} (0.1 gr/dscf) of exhaust gas. The facility has general process units; therefore, this regulation applies to the facility.

7.p. 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.q. 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.r. SWCAA 400-111 "Requirements for Sources in a Maintenance Plan Area" requires that no approval to construct or alter an air contaminant source will be granted unless it is evidenced that:

(1) The equipment or technology is designed and will be installed to operate without causing a violation of the applicable emission standards;
(2) Emissions will be minimized to the extent that the new source will not exceed emission levels or other requirements provided in the maintenance plan;
(3) BACT will be employed for all air contaminants to be emitted by the proposed equipment;
(4) The proposed equipment will not cause any ambient air quality standard to be exceeded; and
(5) If the proposed equipment or facility will emit any toxic air pollutant regulated under WAC 173-460, the proposed equipment and control measures will meet all the requirements of that Chapter.

The facility is located in a maintenance plan area; therefore, this regulation applies to the facility.

7.s. 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 490-204 "Graphic Arts Systems" applies to printing systems including flexographic printing systems that use more than 100 tpy of VOCs as a component of ink, for the thinning of ink, cleaning of presses, press components and equipment. The permittee does not use more than 100 tpy of VOCs, therefore, the standards in this section do not apply to the permittee.

7.t. SWCAA 493-400 "Motor Vehicle Refinishing" establishes VOC content limits for motor vehicle refinishing coatings. This regulation is applicable to this facility because it paints vehicles and vehicle parts.

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

The proposed equipment and control systems incorporate BACT for the types and amounts of air contaminants emitted by the processes as described below:

New BACT Determination

8.a. BACT Determination – Spray Booth. The proposed use of enclosed spray booths operated at the rated air flow rate, spray booths equipped with arrestors with a minimum of 98% capture efficiency, and the use of HVLP spray guns operating at maximum cap pressure of 10 psig has been determined to meet the requirements of BACT for the types and quantities of emissions from the spray booth.

Previous BACT Determinations

8.b. BACT Determination – Prep Area Ventilation. The use of high efficiency particulate matter filters and vertical atmospheric dispersion of exhaust streams has been determined to meet the requirements of BACT for prep area ventilation at this facility.

8.c. BACT Determination – Spray Booth Heater. The use of combustion equipment that fires a low sulfur fuel (natural gas) and limits visible emissions to zero percent (0%) opacity or less has been determined to meet the requirements of BACT for booth heating at this facility.

Other BACT Determinations

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 O_3), and SO_2 are emitted at levels where no adverse ambient air quality impact is anticipated.

9.b. Toxic Air Pollutant Review. The new equipment and modifications proposed in ADP application CL-3286 will not affect the type or quantity of TAP emissions from the paint booth. Previously approved BACT measures at the facility will limit emissions of Class A and B toxic air pollutants to below the applicable Small Quantity Emission Rates (SQER) or Acceptable Source Impact Level (ASILs) specified in WAC 173-460.

Conclusions

9.c. Removal of the wet scrubber and addition of arrestors, as proposed in ADP application CL-3286, 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. Removal of the wet scrubber and addition of arrestors, as proposed in ADP application CL-3286, 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. Removal of the wet scrubber and addition of arrestors, as proposed in ADP application CL-3286, 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 25-3687 in response to ADP application CL-3286. ADP 25-3687 contains approval requirements deemed necessary to assure compliance with applicable regulations and emission standards as discussed below.

10.a. Supersession of Previous Permits. ADP 25-3687 supersedes ADP 02-2444 in its entirety. Compliance will be determined under this ADP, not previously superseded ADPs. Existing approval conditions for units not affected by this project have been carried forward unchanged.

10.b. Emission Limits. Facility-wide emission limits are based on the sum of the emission limits for approved equipment calculated in Section 6 of this Technical Support Document.

Visible emissions from the prep station and spray booth exhaust systems have been limited to zero percent opacity, consistent with proper operation.

10.c. Operational Limits and Requirements. Air pressure at the air cap of the HVLP spray guns has been limited to 10 psig. This is the maximum pressure at which the spray guns are designed to operate properly.

Approval conditions 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.

The spray booth heater must only fire natural gas, the use of any other fuel is prohibited.

10.d. Monitoring, Recordkeeping, and Reporting Requirements. Sufficient reporting and recordkeeping was established to document compliance with the established emission limits, provide for general requirements (upset reporting, annual emission inventory submission), and assist in the compliance assessment during on-site inspections. Records of maintenance activities and the results of periodic inspections conducted by facility personnel are required because they are valuable tools for regulatory inspectors and plant personnel. In addition, these records can be used to determine appropriate operating and maintenance requirements in a future permitting action.

10.e. Reporting Requirements. ADP 25-3687 establishes general reporting requirements for annual air emissions, upset conditions and excess emissions. Specific reporting requirements are established for coating consumption, fuel consumption, and material throughput.

Consistent with ADP application CL-3286, the scope of this permitting action is limited to control equipment replacement. The applicant has not proposed any change in material consumption or process emissions.

11. START-UP AND SHUTDOWN/ALTERNATIVE OPERATING SCENARIOS/POLLUTION PREVENTION

11.a. Start-up and Shutdown Provisions. Pursuant to SWCAA 400-081 "Start-up and Shutdown", technology-based emission standards and control technology determinations must take into consideration the physical and operational ability of a source to comply with the applicable standards during start-up or shutdown. Where it is determined that a source is not capable of achieving continuous compliance with an emission standard during start-up or shutdown, SWCAA will include appropriate emission limitations, operating parameters, or other criteria to regulate performance of the source during start-up or shutdown.

To SWCAA's knowledge, this facility can comply with all applicable standards during startup and shutdown.

11.b. Alternate Operating Scenarios. SWCAA conducted a review of alternate operating scenarios applicable to equipment affected by this permitting action. The permittee did not propose or identify any applicable alternate operating scenarios. Therefore, none were included in the approval conditions.

11.c. Pollution Prevention Measures. SWCAA conducted a review of possible pollution prevention measures for the facility. No pollution prevention measures were identified by either the permittee or SWCAA separate or in addition to those measures required under BACT considerations. Therefore, none were included in the approval conditions.

12. EMISSION MONITORING AND TESTING

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

13. FACILITY HISTORY

13.a. Previous Permitting Actions. The following past permitting actions have been taken by SWCAA for this facility:

Permit	Application	Date Issued	Description
02-2444	CL-1565	01/22/2003	Initial permitting of the facility. Approval for vehicle prep ventilation system, paint booth, and heater.

13.b. Compliance History. A search of source records on file at SWCAA did not identify any previous or outstanding compliance issues over the past five (5) years.

14. PUBLIC INVOLVEMENT OPPORTUNITY

14.a. Public Notice for ADP Application CL-3286. Public notice for ADP application CL-3286 was published on the SWCAA website for a minimum of fifteen (15) days beginning on February 4, 2025.

14.b. Public/Applicant Comment for ADP Application CL-3286. SWCAA did not receive specific comments, a comment period request, or any other inquiry from the public or the applicant regarding ADP application CL-3286. Therefore, no public comment period was provided for this permitting action.

14.c. State Environmental Policy Act. After review of the SEPA Checklist for this project, SWCAA has determined that it is exempt from SEPA requirements pursuant to WAC 197-11-800(3) and has issued Determination of SEPA Exemption 25-008. This project only involves repair, remodeling, maintenance, or minor alteration of existing structures, equipment or facilities, and will not involve material expansions or changes in use. There is no physical change proposed in the project that would have an adverse impact on the environment beyond that which has already been evaluated under previous SEPA reviews.