



SWCAA
Southwest Clean Air Agency

TECHNICAL SUPPORT DOCUMENT

**Air Discharge Permit ADP 18-3265
ADP Application CO-987**

**Northwest Motor Service Center
SWCAA ID - 2517**

Final Issued: February 7, 2018

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TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
1. Facility Identification	I
2. Facility Description	1
3. Current Permitting Action	1
4. Process Description	1
5. Equipment/Activity Identification	2
6. Emissions Determination	3
7. Regulations and Emission Standards	6
8. RACT/BACT/BART/LAER/PSD/CAM Determinations	7
9. Ambient Impact Analysis	8
10. Discussion of Approval Conditions	8
11. Start-up and Shutdown Provisions/Alternative Operating Scenarios/Pollution Prevention	9
12. Emission Monitoring and Testing	9
13. Facility History	9
14. Public Involvement	10

Abbreviations

acfm	actual cubic feet per minute
ADP	Air Discharge Permit
AP-42	<u>Compilation of Emission Factors, AP-42, Fifth Edition, Volume 1, Stationary Point and Area Sources – published by the US Environmental Protection Agency</u>
BACT	Best available control technology
Btu	British thermal unit
Btu/gal	Heat content expressed in British thermal units per gallon
CAS #	Chemical Abstracts Service registry number
cfm	Cubic feet per minute
CFR	Code of Federal Regulations
CO	Carbon monoxide
dscfm	Dry standard cubic feet per minute
EPA	U.S. Environmental Protection Agency
gr/dscf	Grains per dry standard cubic foot (68 °F, 1 atmosphere)
HAP	Hazardous air pollutant listed pursuant to Section 112 of the Federal Clean Air Act
lb/10 ⁶ scf	Pounds per million standard cubic feet
lb/hr	Pounds per hour
lb/MMBtu	Pounds per million British thermal units
lb/ton	Pounds per ton
lb/yr	Pounds per year
MMBtu/hr	Millions of British thermal units per hour
MSDS	Material Safety Data Sheet
NO _x	Nitrogen oxides
NOV	Notice of Violation
PM	Total particulate matter (includes both filterable and condensable particulate matter as measured by EPA Methods 5 and 202)
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to 10 micrometers (includes both filterable and condensable particulate matter as measured by EPA Methods 5 and 202)
PM _{2.5}	Particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers (includes both filterable and condensable particulate matter as measured by EPA Methods 5 and 202)
ppm	Parts per million
ppmv	Parts per million by volume
ppmvd	Parts per million by volume, dry
PSD	Prevention of Significant Deterioration
RCW	Revised Code of Washington
SQER	Small Quantity Emission Rate listed in WAC 173-460
SO ₂	Sulfur dioxide
SWCAA	Southwest Clean Air Agency
TAP	Toxic air pollutant pursuant to Chapter 173-460 WAC
T-BACT	Best Available Control Technology for toxic air pollutants
tpy	Tons per year
VOC	Volatile organic compound
WAC	Washington Administrative Code

1. FACILITY IDENTIFICATION

Applicant Name: Northwest Motor Sales and Service
Applicant Address: 1331 Baltimore Street, Longview, Washington 98632

Facility Name: Northwest Motor Service Center
Facility Address: 1331 Baltimore Street, Longview, Washington 98632
Contact person: Spencer Wiggins, President
SWCAA Identification: 2517

Primary Process: Motor repair and maintenance services, commercial or industrial
SIC/NAICS Code: 7699 / 811310
Facility Classification: Natural Minor

2. FACILITY DESCRIPTION

Northwest Motor Service Center (Northwest Motor) operates a facility that repairs and reconditions electric motors for a wide variety of commercial and industrial customers.

3. CURRENT PERMITTING ACTION

This permitting action is in response to Air Discharge Permit application number CO-987 (ADP Application CO-987) dated December 20, 2017. Northwest is relocating its existing Longview facility from 1341 Industrial Way to 1331 Baltimore Street. In support of the relocation, Northwest Motor is requesting approval for the following:

- Installation of a new cleaning oven.
- Installation of a new bake oven.
- Relocation of an existing paint booth from the old facility to the new location.

The current permitting action provides approval for installation of a new motor repair facility as proposed in ADP Application CO-987.

4. PROCESS DESCRIPTION

4.a Motor Repair. This facility inspects and repairs damaged motors and motor parts. Facility operations include, but are not limited to, burning off and cleaning old motor parts (wiring, motor cases, etc.), rewinding armatures, bearing replacements, and complete motor rebuilds. The facility operates a burnout oven for the purposes of removing insulating varnish and traces of oil and grease from motor windings. Some motors and/or motor parts are spray coated to customer specification subsequent to repair.

5. EQUIPMENT/ACTIVITY IDENTIFICATION

- 5.a Burn Oven. This unit is an oven used to burn off varnish, oil, and grease from motor windings. The primary chamber of this unit roasts windings until the contaminants volatilize. Oxygen and temperature levels are limited to prevent ignition of the volatilized contaminants, which are vented to a secondary chamber and afterburner. The unit is described as follows:

Oven Make / Model: Ace Heat / 280-RT
Booth Dimensions: 121" W x 140" D x 120" H
Burner Make / Model: (1) Midco / J121-3
(1) Midco / J83-DS
Fuel: Natural gas
Heat Input: 0.4 MMBtu/hr
0.2 MMBtu/hr
Exhaust: 18" dia vertical stack at ~18' above ground level (*4' above roof level*)

Afterburner. The primary burnout chamber vents a mixture of volatile vapors and smoke into a secondary chamber where it is exposed to elevated temperatures ($\geq 1,500$ °F) for an extended period of time (≥ 0.9 seconds) to complete oxidation. The afterburner is described as follows:

Burner Make / Model: Midco / J121-3
Fuel: Natural gas
Heat Input: 0.825 MMBtu/hr

- 5.b Bake Oven. This unit is an oven used to dry moisture from motor parts and cure the varnish on rebuilt motor windings. The unit is described as follows:

Oven Make / Model: Ace Heat / 101010
Booth Dimensions: 137" W x 150" D x 144" H
Burner Make / Model: Maxon / NP-1
Fuel: Natural gas
Heat Input: 0.900 MMBtu/hr
Exhaust: 7" dia vertical stack at ~18' above ground level (*4' above roof level*)

- 5.c Paint Booth. This unit is a three sided enclosure used to apply spray coatings to motors and motor parts. The enclosure is configured with a filter bank on the interior back wall and a dedicated exhaust fan. The unit is described as follows:

Make / Model: Site built
Booth Dimensions: 124" W x 132" D x 86" H
Rated exhaust flow: 6,780 acfm (*estimated*)
Exhaust filter area: 55.5 ft² (20 - 20"x20"x2" filters)
Exhaust filter material: Spun polyester
Exhaust filter efficiency: 98.6%
Exhaust description: 24" diameter vertical stack at ~18' above ground level (*4' above roof level*)

Spray Coating Equipment. Coatings are applied with high transfer efficiency spray guns such as, but not limited to, Central Pneumatic model 68843 HVLP.

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:

Sandblast Cabinet. This facility operates a small sandblast cabinet. The unit is self-contained and does not exhaust to the ambient atmosphere.

Winding Dip Tank. This facility uses a dip tank to coat new motor windings with insulating varnish. The coating in use is a waterborne epoxy with zero VOC content.

Welding. This facility operates a small welding station. Use of the station is extremely limited.

Drying Oven - Electric. One Steelman, model #568ES electrically heated convection drying oven with a maximum temperature of 450°F. This oven is used to heat motor parts to approximately 315°F and drive out water moisture left over from parts cleaning.

Brush Nickel Plating Booth. A booth previously used for spray coating operations has been repurposed and is now being used to conduct brush plating operations. The facility uses approximately one five (5) gallon container of Nickel Hi-Speed (LDC-2803) ammonia solution a month. At this time, it was determined that the current usage and procedure does not require permitting. The booth is equipped with an exhaust that vents horizontally out of the building.

Hydro-Blast Parts Washer. One (1) Hydro-Blast Aqueous Parts Washer Model 100-G. Water flow rate through a 5 hp pump is 170 GPM at 18 kW heat capacity. The parts cleaner uses a biodegradable detergent, Apollo jet washer cleaner. This unit is used approximately two times per week.

5.e Equipment/Activity Summary.

ID No.	Generating Equipment/Activity	# of Units	Control Measure/Equipment	# of Units
1	Burn Oven (1.425 MMBtu/hr)	1	Proper Combustion Control, Afterburner, Low Sulfur Fuel	1
2	Bake Oven (0.9 MMBtu/hr)	1	Proper Combustion Control, Low Sulfur Fuel	N/A
3	Paint Booth (6,780 cfm)	1	Process Enclosure, High Efficiency Filtration, High Transfer Efficiency Equipment	N/A

6. EMISSIONS DETERMINATION

Emissions to the ambient atmosphere from the new motor repair facility proposed in ADP Application CO-987 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).

6.a Burn Oven (new). Emissions from oven operation are calculated from a combined rated heat input of 1.425 MMBtu/hr, 8,760 hr/yr of operation, and applicable emission factors. The emission factor for PM is taken from emission test information submitted by the manufacturer. All PM is assumed to be PM_{2.5}. Emission factors for all other pollutants are taken from EPA AP-42 §1.4 "Natural Gas Combustion" (3/98). Annual emissions will be calculated from actual fuel consumption and hours of oven operation using the emission factors listed below.

Heat Input: 1.425 MMBtu/hr Hours of Operation: 8,760 hr/yr

<u>Pollutant</u>	<u>Emission Factor</u>	<u>Potential Emissions</u>
NO _x	0.098 lb/MMBtu	0.61 tpy
CO	0.082 lb/MMBtu	0.51 tpy
VOC	0.0054 lb/MMBtu	0.03 tpy
SO ₂	0.0006 lb/MMBtu	0.004 tpy
PM/PM ₁₀ /PM _{2.5}	0.0316 lb/hr	0.14 tpy
Benzene	2.06E-06 lb/MMBtu	0.03 lb/yr
Formaldehyde	7.35E-05 lb/MMBtu	0.92 lb/yr

6.b Bake Oven (new). Potential emissions from oven operation are calculated from a rated heat input of 0.9 MMBtu/hr, 8,760 hr/yr of operation, and emission factors 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 from actual fuel consumption using the emission factors listed below.

Heat Input: 0.900 MMBtu/hr Hours of Operation: 8,760 hr/yr

<u>Pollutant</u>	<u>Emission Factor</u>	<u>Potential Emissions</u>
NO _x	0.098 lb/MMBtu	0.39 tpy
CO	0.082 lb/MMBtu	0.32 tpy
VOC	0.0054 lb/MMBtu	0.02 tpy
SO ₂	0.0006 lb/MMBtu	0.002 tpy
PM/PM ₁₀ /PM _{2.5}	0.0075 lb/MMBtu	0.03 tpy
Benzene	2.06E-06 lb/MMBtu	0.02 lb/yr
Formaldehyde	7.35E-05 lb/MMBtu	0.58 lb/yr

6.c Spray Coating (new). Potential emissions of VOC, TAP and HAP from spray coating operations are calculated using Safety Data Sheet (SDS) information for individual coating products, estimated material consumption and a material balance methodology. Emissions of particulate matter are calculated from specified material consumption, an average coating solids content of 30% by weight, average transfer efficiency of 65%, and a filter capture efficiency of 98%. All of the emitted PM is assumed to be PM₁₀. 78% of the PM by weight is assumed to be PM_{2.5} based on data from Version 2.0 of EPA's Particulate Matter Calculator for SCC 40200101. Annual emissions will be calculated from actual material usage using the material balance methodology cited above.

<u>Pollutant</u>	<u>Emissions</u>
VOC	1.00 tpy
PM/PM ₁₀	0.004 tpy
PM _{2.5}	0.003 tpy
TAP	0.66 tpy
HAP	0.12 tpy

6.d Emissions Summary/Facilitywide Potential to Emit. Facilitywide potential to emit as calculated in the sections above is summarized below.

<u>Pollutant</u>	<u>Emissions</u>	<u>Project Increase</u>
NO _x	1.00 tons	1.00 tons
CO	0.84 tons	0.84 tons
VOC	1.05 tons	1.05 tons
SO ₂	0.006 tons	0.006 tons
Lead	0.00 tons	0.00 tons
PM	0.17 tons	0.17 tons
PM ₁₀	0.17 tons	0.17 tons
PM _{2.5}	0.17 tons	0.17 tons
TAP	0.66 tons*	0.66 tons
HAP	0.12 tons*	0.12 tons

* TAP and HAP emissions are estimated based on maximum VOC emissions of 1.0 tpy and a representative selection of spray coatings commonly used at the facility. Actual TAP and HAP emissions will vary depending upon the actual combination of spray coatings used in any given calendar year.

<u>Pollutant</u>	<u>CAS Number</u>	<u>Category</u>	<u>Facilitywide Emissions (lb/yr)</u>	<u>Project Increase (lb/yr)</u>	<u>WAC 173-460 SQER (lb/yr)</u>
Acetone	67-64-1	TAP B	259.9	259.9	43,748
Benzene	71-43-2	HAP/TAP A	0.04	0.04	20
Butane	106-97-8	TAP B	26.4	26.4	43,748
n-Butyl Acetate	123-86-4	TAP B	1.7	1.7	43,748
Carbon Black	1333-86-4	TAP B	0.2	0.2	1,750
Methylene Chloride	75-09-2	HAP/TAP A	7.7	7.7	50
Ethanol	64-17-5	TAP B	0.2	0.2	43,748
Ethyl Benzene	100-41-4	HAP/TAP B	29.9	29.9	43,748
Ethylene Glycol Monobutyl Ether	111-76-2	TAP B	20.3	20.3	43,748
Formaldehyde	50-00-0	HAP/TAP A	1.5	1.5	20
Isobutanol	78-83-1	TAP B	0.3	0.3	43,748
Isopropanol	67-63-0	TAP B	7.6	7.6	43,748
Methyl Ethyl Ketone	78-93-3	TAP B	470.0	470.0	43,748
Methyl Isobutyl Ketone	108-10-1	HAP/TAP B	1.0	1.0	43,748
Toluene	108-88-3	HAP/TAP B	34.7	34.7	43,748
Propylene Glycol Monomethyl Ether	107-98-2	TAP B	253.2	253.2	43,748
VM&P Naphtha	8030-30-6	TAP B	38.0	38.0	43,748
Xylene	1330-20-7	HAP/TAP B	172.3	172.3	43,748

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 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 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) 70.94.141 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 70.94] 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.d RCW 70.94.152 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.e 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. SWCAA implements WAC 173-460 as in effect on August 21, 1998.
- 7.f 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.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, sulfur dioxide, concealment and masking, and fugitive dust.
- 7.h SWCAA 400-040(1) "Visible Emissions" requires that no emission of an air contaminant from any emissions unit shall 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.
- 7.i SWCAA 400-040(2) "Fallout" requires that no emission of particulate matter from any source shall 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.
- 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.

- 7.k SWCAA 400-040(4) "Odors" requires that any person who shall cause or allow the generation of any odor from any source, which may unreasonably interfere with any other property owner's use and enjoyment of their property use recognized good practices and procedures to reduce these odors to a reasonable minimum.
- 7.l SWCAA 400-040(6) "Sulfur Dioxide" requires that no person shall emit a gas containing in excess of one thousand ppm of sulfur dioxide on a dry basis, corrected to 7% O₂ or 12% CO₂ as required by the applicable emission standard for combustion sources.
- 7.m SWCAA 400-040(8) "Fugitive Dust Sources" requires that reasonable precautions be taken to prevent fugitive dust from becoming airborne, and minimize emissions.
- 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 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.o 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.p SWCAA 400-110 "New Source Review" requires that an Air Discharge Permit Application be filed with SWCAA, and an Air Discharge Permit be issued by SWCAA, prior to establishment of the new source, emission unit, or modification.
- 7.q SWCAA 400-113 "Requirements for New Sources in Attainment or Nonclassifiable Areas" 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) Best Available Control Technology will be employed for all air contaminants to be emitted by the proposed equipment;
 - (3) The proposed equipment will not cause any ambient air quality standard to be exceeded; and
 - (4) If the proposed equipment or facility will emit any toxic air pollutant regulated under WAC 173-460, the proposed equipment and control measures will meet all the requirements of that Chapter.

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:

- 8.a BACT Determination – Burn Oven. The proposed use of low sulfur fuel, vertical discharge of exhaust streams, and an oven configured with a secondary chamber capable of maintaining a minimum temperature of 1400 °F and 0.9 second retention time has been determined to meet the requirements of BACT for burnout ovens at this facility.
- 8.b BACT Determination – Bake Oven. The proposed use of low sulfur fuel, modern combustion controls, and vertical discharge of exhaust streams has been determined to meet the requirements of BACT for drying ovens at this facility.
- 8.c BACT Determination – Spray Coating. The proposed use of process enclosure (spray booth), high efficiency particulate filtration (≥98% efficiency), high transfer efficiency coating equipment, low-VOC coatings, and vertical discharge of exhaust streams has been determined to meet the requirements of BACT for spray coating operations 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.d 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 (effective 8/21/98).

Conclusions

- 9.b Installation and operation of the motor repair facility proposed in ADP Application CO-987 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 Installation and operation of the motor repair facility proposed in ADP Application CO-987 will not cause the requirements of WAC 173-460 "Controls for New Sources of Toxic Air Pollutants" (as in effect 8/21/98) or WAC 173-476 "Ambient Air Quality Standards" to be violated.
- 9.d Installation and operation of the motor repair facility proposed in ADP Application CO-987 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 18-3265 in response to ADP Application CO-987. ADP 18-3265 contains approval requirements deemed necessary to assure compliance with applicable regulations and emission standards as discussed below.

- 10.a General Basis. Permit requirements for equipment affected by this permitting action incorporate the operating schemes proposed by the applicant in ADP Application CO-987. 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.b Monitoring and Recordkeeping Requirements. ADP 18-3265 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 requirements are established for burnout oven operation, coating consumption and fuel consumption.

- 10.c Reporting Requirements. ADP 18-3265 establishes general reporting requirements for annual air emissions, upset conditions and excess emissions. Specific reporting requirements are established for coating consumption and fuel consumption. Reports are to be submitted on an annual basis.
- 10.d Burn Oven. The permittee is required to operate an afterburner during burnout operations. The afterburner is designed to expose primary exhaust streams in a secondary chamber with elevated temperatures ($\geq 1,400$ °F) for a prolonged period of time (≥ 0.9 seconds). This design ensures complete combustion of partially burnt byproducts from the burnout process. The permittee is required to monitor operating temperatures in the afterburner chamber to ensure proper operation.
- 10.e Spray Coating. Visible emissions from the prep station and spray booth exhaust systems has been 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.

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.
- 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 or in addition to 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 not previously issued any permits for this facility.
- 13.b Compliance History. A search of source records on file at SWCAA did not identify any outstanding compliance issues at this facility.

14. PUBLIC INVOLMENT OPPORTUNITY

- 14.a Public Notice for ADP Application CO-987. Public notice for ADP Application CO-987 was published on the SWCAA internet website for a minimum of (15) days beginning on January 5, 2018.
- 14.b Public/Applicant Comment for ADP Application CO-987. 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. A complete SEPA checklist was submitted by Northwest Motor in conjunction with ADP Application CO-987. After reviewing the checklist, SWCAA has made a Determination of Non Significance (DNS) concurrent with issuance of ADP 18-3265.