

ORDER OF APPROVAL
NOTICE OF CONSTRUCTION 23NOC1584
ISSUED TO DentCenter, LLC ON SEP 07 2023

This Order of Approval (“Order”) is issued in accordance with Olympic Region Clean Air Agency (“ORCAA”) Regulations and Chapter 173-400 of the Washington Administrative Code.

Conditional approval for the installation and operation of an autobody spray booth (“Approved Equipment”) located at 410 Ronlee Ln NW in Olympia (“Approved Location”), for operation solely as described in the associated Notice of Construction (“NOC”) application No. 23NOC1584, is hereby GRANTED to DentCenter, LLC (“Applicant”), subject to the Conditions of Approval listed below.

This Order and the Conditions of Approval herein remain in effect for the life of the Approved Equipment as used at approved locations and is binding on Applicant, current owners and operators of the equipment, and Applicant’s heirs, successors and assigns unless amended or superseded by a subsequent Order issued by ORCAA or unless the equipment is permanently shut down. The Applicant must notify any subsequent owner, operator, heirs, successor or assigns of this Order and the Conditions of Approval herein.

Conditions of Approval established in this Order are enforceable in addition to any applicable state, local and federal regulations or standards in existence now or in the future. Compliance with the conditions of this Order do not relieve the Applicant or any owner or operator from compliance with ORCAA Regulations, Chapter 70A.15 Revised Code of Washington (RCW), or any other emissions control requirements, nor from any penalties for failure to comply with the same. Applicant may appeal this Order to the Pollution Control Hearings Board (“PCHB”) by filing a written appeal with the PCHB and serving a copy upon ORCAA within thirty (30) days of receipt of this Order.

This Order is GRANTED, issued at the Approved Location, subject to the following Conditions of Approval:

1. **Approved Equipment:** Except as provided in condition 4a, spray coating operations must be conducted within the spray booth identified in Table 1 and in accordance with conditions in this Order of Approval. The owner or operator must submit an air permit application and secure the agency’s approval prior to adding, replacing or significantly altering any spray booth.

Table 1 Approved Equipment

Emission Unit #	Specifications	Air Pollution Controls
EU1 - Spray Booth	Manufacturer: Global Finishing Solutions Model: CXP8 Dimensions: 14' W x 27' L x 9' H (booth dimensions not a requirement; included in permit for informational purposes only)	<ul style="list-style-type: none"> • Stack 6' above roof line • Exhaust filtration system with combined efficiency demonstrated to achieve at least 98% capture of paint overspray.

[Authority: WAC 173-400-113; ORCAA 6.1.2(l); ORCAA 6.1.4(a)(1)]

2. **Material Use Limits:** Unless prior approval is granted by ORCAA, the cumulative amount of paints and solvents used in all surface coating operations, including but not limited to clear coat, basecoat, primer, solvents and cleaners, during any 12-consecutive month period must not exceed the following limits:
 - a. 1,900 gallons for all VOC-containing materials;
 - b. Up to 245 gallons may have a VOC content greater than 3.5 lbs/ gallon;
 - c. The use of any material containing Methylene Chloride (CAS Number 75-09-2), Chromium, or 1,6 Hexamethylene Diisocyanate (aka HDI, CAS Number 822-06-0) is prohibited.

[Authority: WAC 173-460-070; ORCAA 6.1.4(a)(1)]

3. **Stack Requirements:** Exhaust stack of the spray booth must have a vertical discharge to the atmosphere at least six feet above the peak height of the building. There must be no flow obstructions at the point of discharge (i.e. cap). However, a weatherproof stack exhaust configuration that does not obstruct the air flow as it exits the stack is acceptable. The stack base must be at least 25 feet from the facility's property line.

[Authority: WAC 173-400-113; ORCAA 6.1.4(a)(2)]

4. **Operation & Maintenance Requirements:** The following is required:
 - a. Except for minor touch up work (pieces 9 square feet or less), all spray coating operations must be conducted in an enclosure comprised of at least three sides and a ceiling that captures and exhausts all overspray through exhaust filters meeting the requirements of this order.
 - b. Approved spray booth must be equipped with properly seated exhaust filters that cover all openings of the exhaust plenum and are rated at least 98 percent efficient.
 - c. Cleaning spray guns in such a way that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects the used gun cleaning solvent.
 - d. Keeping volatile materials in closed containers when not being used.
 - e. Operating and maintaining the spray booth consistent with the manufacturer's recommendations.
 - f. Storing all spray coating operation-related solvents, solvent-containing cloths, or other materials used for surface preparation in closed, airtight containers.
 - g. Minimizing and promptly cleaning up all volatile material spills and leaks.

- h. Monitoring filters each day the booth is operated and replacing whenever damaged or loaded with particulate build-up to an extent that jeopardizes the effectiveness of the spray booth in capturing and controlling emissions.

[Authority: WAC 173-400-101; ORCAA 4.3(g); ORCAA 6.1.4(a)(1); ORCAA 8.8]



- 5. **Approval of Air Pollution Control Devices:** Adding, replacing or moving any air pollution control device such as a spray booth, prep-booth or exhaust fan used to capture overspray requires prior approval by ORCAA.

[Authority: WAC 173-400-114; ORCAA Rule 6.1]

- 6. **Recordkeeping:** Copies of records must be maintained for a minimum period of five years from the date of origin, and kept on-site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after the date the record is generated and may be kept off-site after that two-year period, provided the records can be made available to ORCAA within 15-days from being requested. At a minimum, records must include the following:

- a. Purchase invoices indicating the amount of VOC and TAP-containing materials used in spray coating operations including the date of purchase and corresponding product identification numbers.
- b. Monthly record of the actual cumulative amount of VOC and TAP-containing materials (used in spray coating operations) used in terms of gallons per month and gallons per previous 12-consecutive months.
- c. Safety Data Sheets (SDS) for all VOC and TAP-containing materials on site associated with spray coating operations.
- d. Records sufficient to verify the average overspray arrestance (filtration) ratings of each exhaust filter material type. Published filter efficiency data provided by filter vendors or laboratories may be used to demonstrate compliance with this requirement.

[Authority: WAC 173-400-102; ORCAA 6.1.4(a)(1); ORCAA Rule 8.11]

	
PREPARED BY Aaron Manley, Engineer II	REVIEWED BY Mark Goodin, P.E.
Date	Date
9/7/2023	9/7/23





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*Serving Clallam,
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Thurston counties.*

FINAL DETERMINATION to APPROVE:

Automotive Coating Operation

DentCenter, LLC
410 Ronlee Ln NW

23NOC1584
June 13, 2023

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NOTICE OF CONSTRUCTION FINAL DETERMINATION TO APPROVE

Olympic Region Clean Air Agency

Issued to:	DentCenter, LLC	County:	Thurston -67
Location:	410 Ronlee Ln NW Olympia, WA <ZIP>	Source:	152
Application #:	23NOC1584	RC:	5
Prepared on:	June 13, 2023	File:	174

1. Summary

DentCenter, LLC (DentCenter) seeks after-the-fact approval through a Notice of Construction permit (NOC, aka Air Permit) to establish a stationary autobody spray coating operation at their Facility. Installing an automotive spray coating operation will result in an increase in emissions of regulated air pollutants such as particulate matter (PM), volatile organic compounds (VOC), and toxic air pollutants (TAPs). Therefore, DentCenter requires approval from ORCAA through a NOC. A spray booth will be used to control emissions.

Staff reviewed air impacts associated the project and confirmed compliance with both Washington's Controls for New Sources of Toxic Air Pollutants (Chapter 173-460 WAC) as well as other applicable air regulations. Based on this outcome, staff recommends approving the NOC application.

2. Regulatory Background

Pursuant to the Washington Clean Air Act under the Revised Code of Washington 70A.15 RCW, ORCAA's Rule 6.1 requires New Source Review (NSR) for new stationary sources of air pollution in ORCAA's jurisdiction. NSR entails evaluating air quality implications prior to constructing, installing or otherwise establishing any new stationary source of air pollution, modifying an existing stationary source or replacing or substantially altering air pollution control technology. The goal of NSR is to assure projects comply with applicable air regulations and standards, including equipment performance standards and ambient air quality standards.

NSR is initiated by a project proponent submitting a Notice of Construction (NOC) or Notice of Construction Modification (MOD) application, which includes information on the proposed project of sufficient detail to characterize air impacts. Applications are posted on ORCAA's website and may undergo a public notice and comment period if requested by the public or if emissions increases trigger an automatic public notice. Approval of a NOC or MOD is contingent on verifying the proposed new source meets the following criteria for approval from ORCAA's Rule 6.1:

1. **Performance Standards** - The new stationary source will likely comply with applicable air-performance standards such as federal new source performance standards (NSPS), national emission standards for hazardous air pollutants (NESHAPs), or any performance standards adopted under chapter 70A.15 of the Revised Code of Washington (RCW);
2. **BACT** - The new stationary source will employ "Best Available Control Technology" (BACT) to control all air pollutants emitted;
3. **Ambient Air Quality** – Emissions from the new stationary source will not cause or contribute to a violation of any ambient air quality standard;
4. **Federal Air Permitting Requirements** - The new stationary source secures all applicable federal air permits that may apply; and,
5. **Air Toxics** - If there is a potential for toxic air pollutant (TAP) emissions, the stationary source meets all applicable requirements of the State's regulations for new TAP sources under Chapter 173-460 WAC.

3. Facility Background

The Facility location has been an autobody repair shop off and on under various ownerships since at least 2006. DentCenter is the current operator and was identified as a stationary source of air emissions operating without prior approval through ORCAA. DentCenter promptly submitted an application once notified approval through ORCAA was required. This is DentCenter's first permitting action with ORCAA. DentCenter was registered with ORCAA December 13, 2022.

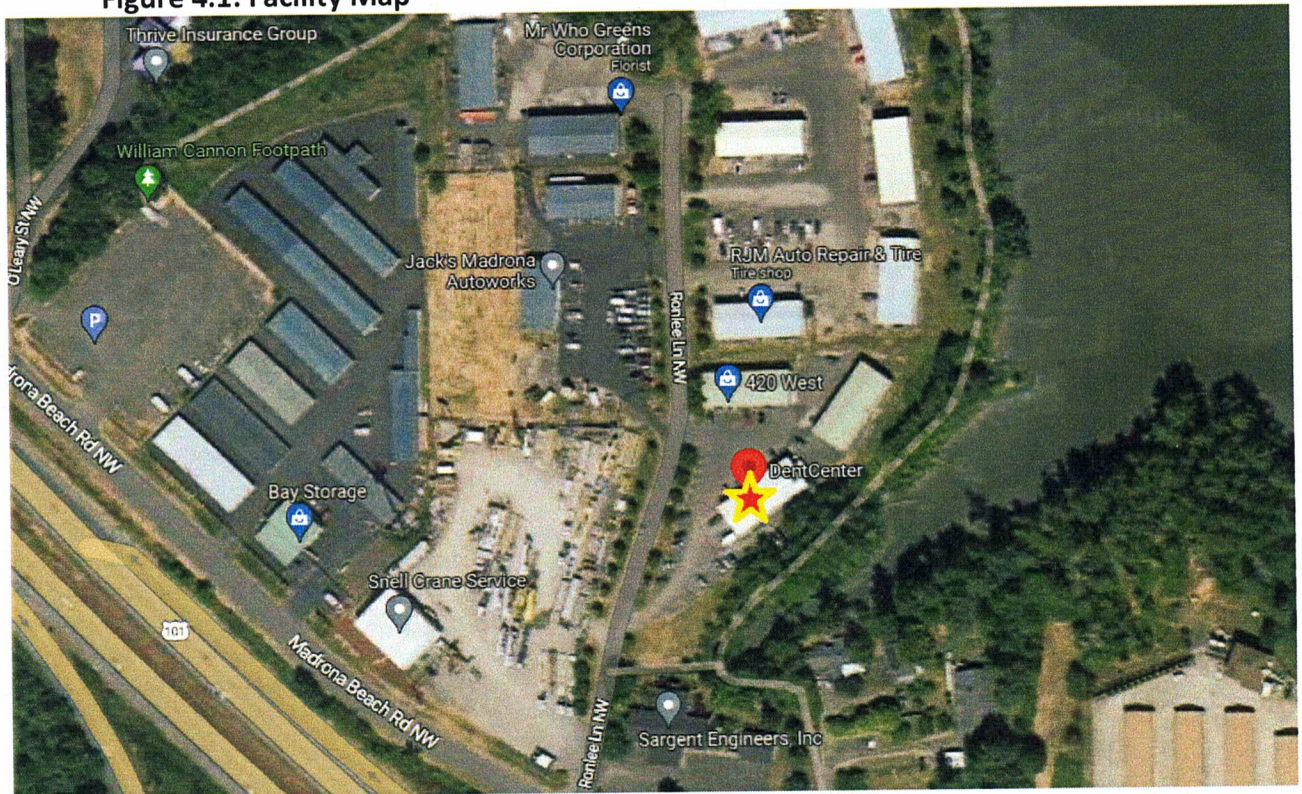
4. Project Description

Vehicles and subassemblies are brought into the spray booth for priming, painting, and clear coat application. The following operations will occur inside the Facility: Spray coating, minor prep or touch-up work which may involve masking, filling, sanding, miscellaneous vehicle repair, prep and touch-up refinishing work, and the application of finishes and coating materials inside the spray booth. The NOC Application (#23NOC1584) includes details on the equipment, which are summarized in Table 1.

The applicant has confirmed the Facility will operate under the following conditions:

- The cumulative amount of materials applied during any 12-consecutive month period will not exceed 1,900 gallons for all materials containing volatile organic compounds (VOC);
- The cumulative amount of materials applied during any 12-consecutive month period will not exceed 245 gallons for materials with VOC contents greater than 3.5 lbs/gal;
- Material is spray applied using high-volume low-pressure (HVLP), electrostatic, airless, air-assisted airless equipment, or an equivalent technology;
- Exhaust stack heights are at least 6 feet above peak height of building;
- Spray booth exhaust flow is at least 7,500 ACFM;
- Exhaust stack discharge will be vertical with the stack base at least 25 feet from the facility's property line.
- There will be no methylene chloride stripping.
- There will be no spray-application of products containing Chromium or 1,6 Hexamethylene diisocyanate (aka HDI; CAS 822-06-0)

Figure 4.1: Facility Map



-Imagery: ©2023 CNES/ Airbus, Maxar Technologies, U.S. Geological Survey, USDA/FPAC/GEO, Map data ©2023. Annotated by ORCAA Staff.

Figure 4.2: Facility Profile View



-Imagery: Google. Image Capture March 2016. Image may be subject to copyright. Annotated by ORCAA staff.

Table 1: Spray Booth Technical Information

Equipment	Manufacturer	Specifications
Spray Booth	Global Finishing Solutions	<ul style="list-style-type: none"> ▪ Model: CXP8 ▪ Fully enclosed full downdraft spray booth with ceiling vent design ▪ Booth dimensions: 14' width, 27' length, 9' height ▪ 30" diameter 7.5 hp fan rated at least 7,500 CFM ▪ Stack height at least 6' above highest height of building roofline ▪ Filters with average arrestance of at least 98%

5. Emissions

Spray coating operations emit particulate air pollution, TAP, and VOC. The majority of any particulate remaining airborne is captured by spray booth filters. VOC emissions from autobody shops are uncontrolled as VOC exist at ambient temperatures and pressures as gases and, therefore, can't be filtered out of an air stream.

In January 2020 ORCAA Staff conducted a generic analysis of emissions from typical, small autobody shops (see Section 6.4 for more details). The generic analysis concluded that emissions resulting from spray-applying 1,900 gallons of material a year met requirements for new TAP sources under Chapter 173-460 WAC, provided only 245 gallons contained a VOC

content greater than 3.5 lbs./ gallon. Air emissions were calculated based on compositions of the predominant paints and primers spray-applied by small autobody shops, which was determined from a statistical analysis of paints and primers used by small autobody shops throughout ORCAA’s region. Condition 2 makes the 1,900- and 245-gallon annual limits enforceable.

Table 2: Cumulative Air Pollutant Emissions

Pollutant	CAS #	PTE Estimates	
		Facility-Wide	
		Annual Rate	Hourly Rate
		(lbs/yr)	(lbs/hour)
Cumene	98828	307.7	0.11
Ethylbenzene	100414	147.0	0.05
Ethylene Glycol Monobutyl Ether	111762	577.0	0.20
Formaldehyde	50000	42.4	0.015
Isopropyl Alcohol (Isopropanol)	67630	3846.4	1.32
Methyl Alcohol	67561	810.0	0.28
Methyl Ethyl Ketone	78933	2500.1	0.86
Methyl Isobutyl Ketone	108101	3461.7	1.19
Naphthalene	91203	7.8	0.003
n-Hexane	110543	3846.4	1.32
Styrene	100425	3461.7	1.19
Toluene	108883	6731.2	2.31
Xylenes	1330207	7692.8	2.63
		lbs/Yr	TPY
Total HAP		7693	3.85
Total TAP		7693	3.85
Total VOC		9691	4.85
Total NOx		0	0
Total PM, PM10, and PM2.5		46	0.02
Total CO		0	0
Total SO2		0	0

-Assumes 1,900 gallons, of which 245 gallons contain > 3.5 lbs. VOC/ gallon

6. Criteria for Approval

ORCAA’s Rule 6.1 establishes the following general criteria for approving new stationary sources of air pollution and modifications:

1. **Performance Standards** - Any new stationary source or modification will likely comply with applicable air-performance standards such as the federal new source performance standards (NSPS), national emission standards for hazardous air pollutants (NESHAPs), and

any performance standards adopted under chapter 70A.15 of the Revised Code of Washington (RCW);

2. **BACT** - The new or modified stationary source is controlled to a level that meets the standard of “Best Available Control Technology” (BACT);
3. **Ambient Air Quality** – Any increase in air emissions will not cause or contribute to a violation of any ambient air quality standard;
4. **Federal Air Permitting Requirements** – All applicable federal air permits, if required, are secured;
5. **Washington Air Toxics Regulations** - If there are increases in toxic air pollutant (TAP) emissions, the requirements of Washington’s Controls for New Sources of Toxic Air Pollutants under Chapter 173-460 WAC are met; and,
6. **Public Outreach** – Public notice and comment requirements in WAC 173-400-171 and ORCAA’s regulations are met.

The project proposed by DentCenter meet these criteria for approval. The following sections provide more detail.

6.1 Applicable Performance Standards (Summary)

ORCAA’s Rule 6.1.4(a)(1) requires a finding that any new or modified stationary source or modification to the approved conditions for operating an existing stationary source will likely comply with applicable state, federal and local performance standards for air emissions including emission standards adopted under chapter 70A.15 of the Revised Code of Washington (RCW), emissions standards of ORCAA, and federal emission standards including New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), and National Emission Standards for Hazardous Air Pollutants for Source Categories (MACT standards). The list of performance standards that apply are shown below (Table 3). Generally applicable state, federal, and local standards are listed in the Appendix.

The only applicable federal regulation that applies to DentCenter is the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources under 40 CFR Part 63, Subpart HHHHHH (AKA: 6H). 6H establishes controls for volatile emissions of methylene chloride and particulate emissions of cadmium, chromium, lead, manganese and nickel from paint stripping and autobody surface coating operations. 6H is a federal regulation that is administered and enforced by EPA Region 10. Although enforcement authority over the regulation is not delegated to ORCAA by EPA, ORCAA does have responsibility to report noncompliance to EPA.

Based on Safety Data Sheets for the paints, primers and solvents used by DentCenter, DentCenter likely qualifies for an exemption from 6H on grounds that no methylene chloride is

used, and paints do not contain cadmium, chromium, lead, manganese or nickel. However, to qualify for this exemption, DentCenter must submit a petition requesting the EPA Administrator grant this exemption. The petition must be sent to the EPA Administrator in care of EPA Region 10.

Table 3: Performance Standards Determined Applicable to DentCenter

Applicable Standard Title & Citation	Applicable Performance Standards	Applicable?
<i>40 CFR Part 63, Subpart HHHHHH (6H) NESHAP: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources</i>	6H establishes controls for volatile emissions of methylene chloride and particulate emissions of cadmium, chromium, lead, manganese and nickel from paint stripping and autobody surface coating operations.	Applicable until granted exemption from EPA.

6.2 Best Available Control Technology (BACT)

ORCAA’s Rule 6.1.4(a)(2) requires any new stationary source or modification employ Best Available Control Technology (BACT) for all pollutants not previously emitted or whose emissions would increase because of the new source or modification.

The air pollution prevention measures and controls currently used by DentCenter qualify as BACT. These include the following:

1. Particulate air pollution minimized through use of High Volume Low Pressure (HVLP) spray guns or equivalent technology, as determined by ORCAA.
2. Particulate air pollution is captured by conducting all spray coating operations within approved spray booths.
3. Particulate air pollution is removed from exhaust air streams using paint arrestor filters.
4. VOC is minimized using low-VOC primers and paints.

6.3 Protection of Ambient Air Quality Standards

ORCAA’s Rule 6.1.4(a)(3) requires emissions from any new stationary source or modification not delay the attainment date of an area not in attainment, or cause or contribute to an existing violation of any Ambient Air Quality Standard (AAQS). ORCAA’s current Dispersion Modeling Guidance (2009) recommends this approval criteria be demonstrated using dispersion modeling techniques when Potential to Emit (PTE) of a pollutant with an ambient standard is above ORCAA’s adopted significant emission level for the pollutant. The following table shows ORCAA’s current significant emissions levels compared to DentCenter’s PTE. As can be seen from this comparison, DentCenter’s emissions are less than ORCAA’s adopted

significance thresholds. Based on this result, ORCAA’s determination is that DentCenter’s emissions will not delay the attainment date of an area not in attainment, or cause or contribute to an existing violation of any AAQS.

Table 4: Emission Increases Requiring Modeling

Pollutant	Significant Emissions Threshold (PTE)	DentCenter Emissions
Carbon Monoxide (CO)	10.0 tpy	0
Sulfur Dioxide (SO ₂)	4.0 tpy	0
Reactive Oxides of Nitrogen (NO _x)	4.0 tpy	0
Particulate Matter (PM or TSP)	2.5 tpy	< 1 tpy
Fine Particulate Matter (PM ₁₀ or PM _{2.5})	1.5 tpy	< 1 tpy
Lead	120 lbs/yr	0
Fluorides	600 lbs/yr	0

6.4 Washington Air Toxics Regulation

ORCAA’s Rule 6.1.4(a)(5) requires new stationary sources of Toxic Air Pollutants (TAP) meet the review requirements in Washington’s regulations titled Controls for New Sources of Toxic Air Pollutants (Air Toxics Rule) under Chapter 173-460 of the Washington Administrative Code. Review of TAP impacts according to the Air Toxics Rule applies when any new stationary source or modification will result in an increase of any TAP above its de-minimis level. The purpose of this is to, “... maintain such levels of air quality as will protect human health and safety.” The TAP covered under the regulation include carcinogens and non-carcinogens. The regulation allows for a multi-tiered approach to assess potential health and safety impacts from TAP increases.

The “First Tier Review” involves comparing estimated ambient TAP impacts with Acceptable Source Impact Levels (ASIL), which are established in the Air Toxics Regulation on a pollutant-by-pollutant basis. If the modeled impact of the increase in emissions of a TAP does not exceed its corresponding ASIL, the First Tier Review is met for that TAP. This analysis typically involves using an ambient air quality model to predict ambient concentrations of a TAP and then comparing the impact with the TAP’s corresponding ASIL. However, the Air Toxics Rule also provides that, if an emission rate for a TAP is less than its “Small Quantity Emission Rate” (SQER), then it can be concluded that emissions are sufficiently low to ensure compliance with the ASIL without further analysis (WAC 173-460-020(7)).

For pollutants with ambient concentrations found to be greater than their ASIL, a “Second Tier Review” is required. Second Tier Reviews involve more refined modeling analyses and approval by the Washington Department of Ecology in addition to ORCAA’s review. Lastly, for TAP that cannot pass a Second Tier Review, the Air Toxics Regulation requires an even more refined “Third Tier Review.”

ORCAA determined DentCenter meets the approval criteria of ORCAA's Rule 6.1.4(a)(5). In January 2020, ORCAA staff conducted a generic analysis of air impacts from typical auto body spray coating operations within ORCAA's jurisdiction. ORCAA's conclusion from this generic analysis was that typical autobody spray coating operations meet approval criteria required in the Air Toxics Rule based on spray-applying 1,900 gallons of material a year met requirements for new TAP sources under Chapter 173-460 WAC, provided only 245 gallons contained a VOC content greater than 3.5 lbs./gallon. The 1,900 gallon annual limit corresponds to total annual air emissions of just under five tons per year (VOC + particulate, see Table 2). ORCAA Staff found materials containing 3.5 lbs. VOC/gallon represent the worst-case VOC and TAP-containing materials, which typically contain the TAP of greatest concern (usually Ethylbenzene, Formaldehyde, or Naphthalene). Limiting the annual use of materials with a VOC content greater than 3.5 lbs. VOC/gallon to 245 gallons was determined necessary to maintain emissions of all TAP below their respective Acceptable Source Impact Level (ASIL) and Small Quantity Emission Rate (SQER) levels prescribed in Chapter 173-460 WAC. ORCAA's generic analysis for small autobody shops is conservative in that choices and assumptions made in the analysis overpredict air pollutant emissions and impacts. ORCAA's general analysis conservatively assumes worst-case materials with respect to TAP will be spray-applied. All TAP with hourly or daily ASILs are conservatively estimated at the highest TAP concentration found in SDS's reviewed. Emissions for TAP with annual ASILs were estimated at the average TAP content found in the SDS's reviewed, plus one standard deviation. ORCAA staff believe this method will bracket likely worst-case emissions.

Because DentCenter's proposed operations, spray booth and paint usage rates conform to specifications and characteristics used in ORCAA's generic analysis of typical spray coating operations, the same conclusion may apply. The analysis for DentCenter was performed under the associated setting resulting in an RC5 classification.

6.5 Federal Air Permitting Requirements

No federal air permits are required since DentCenter is a natural minor source (see Table 2 above).

6.6 Public Outreach

Public notice of individual applications for approval are posted on ORCAA's website when applications are made. Any public concerns or requests for a public comment period or hearing are addressed on a case-by-case basis. A public notice of ORCAA's receipt of DentCenter's application was posted on February 8, 2023, and held open through February 23, 2023. No comments from the public were received during this period.

7. Annual Registration Required

DentCenter will be registered with ORCAA as an “RC5” stationary source of emissions, meaning it is a stationary source with a potential to emit less than 5 tons per year of any combination of pollutants listed in ORCAA Table 4.4a.

8. State Environmental Policy Act (SEPA) Compliance

The State Environmental Policy Act (SEPA) under Chapter 197-11 WAC is intended to provide information to agencies, applicants, and the public to encourage the development of environmentally sound proposals. SEPA helps agency decision-makers, applicants, and the public understand how the entire proposal will affect the environment. SEPA can be used to modify or deny a proposal to avoid, reduce, or compensate for probable environmental impacts.

Lead Agency	ORCAA
SEPA Determination	Determination of Non Significance (DNS) and Adoption of Existing Environmental Document
Date of Issuance	December 8, 2006

The proposed automotive spray coating operation use matches the use of the original SEPA determination. ORCAA staff determined the proposed operation is therefore covered under the original SEPA determination. The SEPA determination is included in the permit attachments.

9. Conditions of Approval

The following recommended conditions of approval are necessary for assuring compliance with applicable air regulations and standards:

1. **Approved Equipment:** Except as provided in condition 4a, spray coating operations must be conducted within the spray booth identified in Table 1 and in accordance with conditions in this Order of Approval. The owner or operator must submit an air permit application and secure the agency’s approval prior to adding, replacing or significantly altering any spray booth.

Table 1 Approved Equipment

Emission Unit #	Specifications	Air Pollution Controls
EU1 - Spray Booth	Manufacturer: Global Finishing Solutions Model: CXP8 Dimensions: 14' W x 27' L x 9' H (booth dimensions not a requirement; included in permit for informational purposes only)	<ul style="list-style-type: none"> • Stack 6' above roof line • Exhaust filtration system with combined efficiency demonstrated to achieve at least 98% capture of paint overspray.

[Authority: WAC 173-400-113; ORCAA 6.1.2(l); ORCAA 6.1.4(a)(1)]

2. **Material Use Limits:** Unless prior approval is granted by ORCAA, the cumulative amount of paints and solvents used in all surface coating operations, including but not limited to clear coat, basecoat, primer, solvents and cleaners, during any 12-consecutive month period must not exceed the following limits:
 - a. 1,900 gallons for all VOC-containing materials;
 - b. Up to 245 gallons may have a VOC content greater than 3.5 lbs/ gallon;
 - c. The use of any material containing Methylene Chloride (CAS Number 75-09-2), Chromium, or 1,6 Hexamethylene Diisocyanate (aka HDI, CAS Number 822-06-0) is prohibited.

[Authority: WAC 173-460-070; ORCAA 6.1.4(a)(1)]

3. **Stack Requirements:** Exhaust stack of the spray booth must have a vertical discharge to the atmosphere at least six feet above the peak height of the building. There must be no flow obstructions at the point of discharge (i.e. cap). However, a weatherproof stack exhaust configuration that does not obstruct the air flow as it exits the stack is acceptable. The stack base must be at least 25 feet from the facility's property line.

[Authority: WAC 173-400-113; ORCAA 6.1.4(a)(2)]

4. **Operation & Maintenance Requirements:** The following is required:
 - a. Except for minor touch up work (pieces 9 square feet or less), all spray coating operations must be conducted in an enclosure comprised of at least three sides and a ceiling that captures and exhausts all overspray through exhaust filters meeting the requirements of this order.
 - b. Approved spray booth must be equipped with properly seated exhaust filters that cover all openings of the exhaust plenum and are rated at least 98 percent efficient.
 - c. Cleaning spray guns in such a way that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects the used gun cleaning solvent.
 - d. Keeping volatile materials in closed containers when not being used.

- e. Operating and maintaining the spray booth consistent with the manufacturer's recommendations.
- f. Storing all spray coating operation-related solvents, solvent-containing cloths, or other materials used for surface preparation in closed, airtight containers.
- g. Minimizing and promptly cleaning up all volatile material spills and leaks.
- h. Monitoring filters each day the booth is operated and replacing whenever damaged or loaded with particulate build-up to an extent that jeopardizes the effectiveness of the spray booth in capturing and controlling emissions.

[Authority: WAC 173-400-101; ORCAA 4.3(g); ORCAA 6.1.4(a)(1); ORCAA 8.8]

5. **Approval of Air Pollution Control Devices:** Adding, replacing or moving any air pollution control device such as a spray booth, prep-booth or exhaust fan used to capture overspray requires prior approval by ORCAA.

[Authority: WAC 173-400-114; ORCAA Rule 6.1]

6. **Recordkeeping:** Copies of records must be maintained for a minimum period of five years from the date of origin, and kept on-site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after the date the record is generated and may be kept off-site after that two-year period, provided the records can be made available to ORCAA within 15-days from being requested. At a minimum, records must include the following:


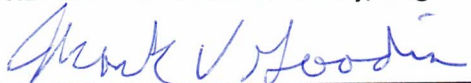
- a. Purchase invoices indicating the amount of VOC and TAP-containing materials used in spray coating operations including the date of purchase and corresponding product identification numbers.
- b. Monthly record of the actual cumulative amount of VOC and TAP-containing materials (used in spray coating operations) used in terms of gallons per month and gallons per previous 12-consecutive months.
- c. Safety Data Sheets (SDS) for all VOC and TAP-containing materials on site associated with spray coating operations.
- d. Records sufficient to verify the average overspray arrestance (filtration) ratings of each exhaust filter material type. Published filter efficiency data provided by filter vendors or laboratories may be used to demonstrate compliance with this requirement.

[Authority: WAC 173-400-102; ORCAA 6.1.4(a)(1); ORCAA Rule 8.11]

10. Final Determination to Approve

This Final Determination documents ORCAA staff's determinations with respect to criteria of approval in ORCAA Rule 6.1, which includes requirements for approval of new stationary sources and modifications in ORCAA's jurisdiction. ORCAA staff recommend approval of DentCenter's proposal to install an automotive spray coating operation, provided the

conditions identified in Section 9 of this Final Determination are implemented through an Approval Order issued in conjunction with ORCAA's approval of 23NOC1584.

 PREPARED BY Aaron Manley, Engineer II	<u>9/7/2023</u> Date
 REVIEWED BY Mark Goodin, P.E.	<u>9/7/23</u> Date

ATTACHMENTS

- 1. Generally Applicable Requirements**
- 2. Abbreviations and Acronyms**
- 3. Emissions Calculations**
- 4. SEPA Determination**

Attachment 1

Generally Applicable Requirements

Requirements for Sources Subject to Registration

Title Citation	Brief Description (Consult rule/regulation for specific requirements)
Registration ORCAA Rule 4	Requires facilities that are minor sources of emissions to register annually with ORCAA and pay annual registration fees. RC5.
Initial Notification ORCAA Rule 4.3(a)&(b)	Requires facilities subject to registration to register by submitting an initial notification with the information in ORCAA Rule 4.3(b) within 30 days from: 1) Commencement of operation of any new or recommissioned stationary source; 2) Change in ownership of existing registered stationary source.
Administrative Change Notification ORCAA Rule 4.3(e)	Requires facilities to notify ORCAA of any changes to administrative information within 30 days from the change taking place including, but not limited to, contact names, address, phone numbers, and permanent shut down or decommissioning of a stationary source.
Annual and/or Periodic Reports ORCAA Rule 4.3(c)&(d)	Requires stationary sources to submit reports with information directly related to the registration program when requested by the Agency within 30 days of receipt of the request.
Notification or Report Signatory ORCAA Rule 4.3(f)	Each notification or report required in ORCAA Rule 4 shall be signed by the owner or operator or by the agent appointed by the owner.
O&M Plan ORCAA Rule 4.3(g)	Requires facilities to develop, implement and update when necessary an Operations and Maintenance (O&M) plan to assure continuous compliance with applicable air regulations and standards.
Registration Fees ORCAA Rule 4.3(h)	Requires facilities to pay an annual registration fee.
New Source Review (NSR) ORCAA Rule 6 Chapter 173-460 WAC	Approval by ORCAA through a NOC application is required prior to establishing or constructing any new source of emissions or modifying an existing source. This includes removal of a control device or substantial modification of an existing control device.
Demolition and Asbestos Requirements ORCAA Rule 6.3	Requires notification prior to certain demolition or asbestos projects as well as requirements for asbestos projects and disposal.
Interference or Obstruction ORCAA Rule 7.1	Prohibits willfully interfering with or obstructing the Control Officer or any Agency employee in performing any lawful duty.
False or Misleading Statements ORCAA Rule 7.2	Prohibits any person from willfully making a false or misleading statement to the Board or its representative as to any matter within the jurisdiction of the Board.
Unlawful Reproduction or Alteration of Documents ORCAA Rule 7.3	Prohibits reproducing or altering, or causing to be reproduced or altered, any order, registration certificate or other paper issued by the Agency if the purpose of such reproduction or alteration is to evade or violate any provision of these Regulations or any other law.
Display of Orders and Certificates ORCAA Rule 7.4	Any order or registration certificate required to be obtained by these Regulations shall be available on the premises designated on the order or certificate. In the event that the Agency requires order or registration certificate to be displayed, it shall be posted. No person shall mutilate, obstruct or remove any order or registration certificate unless authorized to do so by the Board or the Control Officer.
Concealment and Masking ORCAA Rule 7.5 WAC 173-400-040(8)	Prohibits installation or use of any device or means to conceal or mask emissions of an air contaminant, which causes detriment to health, safety, or welfare of any person, or causes damage to property or business.

Title Citation	Brief Description (Consult rule/regulation for specific requirements)
Emissions Detrimental to Persons or Property ORCAA Rule 7.6 WAC 173-400-040(6)	Prohibits causing or allowing the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business.
Visible Emissions ORCAA Rule 8.2(a) WAC 173-400-040(2)	Prohibits emissions with opacity of greater than 20% for more than three (3) minutes in any one hour.
General Requirements ORCAA Rule 8.3 WAC 173-400-040(1)(c)	All emissions units are required to use reasonably available control technology (RACT).
Fugitive Emissions ORCAA Rule 8.3(c) WAC 173-400-040(4)(a)	The owner or operator of any emissions unit engaging in materials handling, construction, demolition or other operation which is a source of fugitive emission shall take reasonable precautions to prevent the release of air contaminants from the operation.
Fallout ORCAA Rule 8.3(e) WAC 173-400-040(3)	Prohibits particulate emissions from any source to be deposited, beyond the property under direct control of the owner or operator of the source, in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material was deposited.
Odor ORCAA Rule 8.5 WAC 173-400-040(5)	ORCAA Rule 8.5 contains general requirements for controlling odors and a general prohibition of odors that unreasonably interfere with the use or enjoyment of a person's property.
Excess Emissions Provisions ORCAA Rule 8.7 WAC 173-400-107	Requires excess emissions be reported to the Authority as soon as possible and within 24 hours and establishes criteria qualifying excess emissions as unavoidable.
Equipment Maintenance and Repair ORCAA Rule 8.8	ORCAA Rule 8.8 requires that all air contaminant sources keep any process and/or air pollution control equipment in good operating condition and repair.
Record Keeping and Reporting ORCAA Rule 8.11	Requires the following: 1. Maintenance of records on the nature and amounts of emissions and other related information as deemed necessary by ORCAA; 2. Reporting of emissions to ORCAA upon request.
Sulfur Dioxide WAC 173-400-040(7)	No person shall cause or allow the emission from any emissions unit in excess of one thousand ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based on the average of any period of sixty consecutive minutes.
Fugitive Dust WAC 173-400-040(9)	The owner or operator of a source or activity that generates fugitive dust must take reasonable precautions to prevent that fugitive dust from becoming airborne and must maintain and operate the source to minimize emissions.
Particulate Standards for Process units ORCAA Rule 8.3(a) WAC 173-400-060	Prohibits emissions from any process unit in excess of 0.1 grain/dscf. EPA test methods from 40 CFR Appendix A shall be used should demonstration of compliance be required.
Particulate Standards for Combustion Units ORCAA Rule 8.3(a) WAC 173-400-050(1)	Prohibits emissions from any combustion unit in excess of 0.1 grain/dscf. EPA test methods from 40 CFR Part 60 Appendix A shall be used should demonstration of compliance be required.

Attachment 2

Abbreviations and Acronyms

Abbreviations and Acronyms

AOP	Air Operating Permit
AP-42	Compilation of Emission Factors, AP-42, Fifth Edition, Volume I, Stationary Point and Area Sources – Published by EPA
ASIL	Acceptable Source Impact Level pursuant to Chapter 173-460 WAC
BACT	Best Available Control Technology
CAM	Compliance assurance monitoring (40 CFR 64)
CFR	Code of Federal Regulations
CO	Carbon monoxide
EPA	United States Environmental Protection Agency
FCAA	Federal Clean Air Act
HAP	Hazardous air pollutant listed pursuant to Section 112 FCAA
MACT	Maximum Achievable Control Technology
NAAQS	National Ambient Air Quality Standard
NESHAPs	National Emission Standards for Hazardous Air Pollutants
NOC	Notice of Construction application
NO _x	Nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
ORCAA	Olympic Region Clean Air Agency
PM	Total particulate matter (filterable + condensable particulate matter)
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to 10 micrometers (filterable + condensable particulate matter)
PM _{2.5}	Particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers (filterable + condensable particulate)
PSD	Prevention of Significant Deterioration
RACT	Reasonably Available Control Technology
RBLC	RACT/BACT/LEAR Clearinghouse
RCW	Revised Code of Washington
SO ₂	Sulfur Dioxide
SQER	Small Quantity Emission Rate listed in Chapter 173-460 WAC
TAP	Toxic Air Pollutant pursuant to Chapter 173-460 WAC

T-BACT	Best Available Control Technology for toxic air pollutants
VOC	Volatile Organic Compound
WAC	Washington Administrative Code

Units of Measurement

'	minute (measurement of angle)
"	second (measurement of angle)
°	degree
acfm	actual cubic feet per minute
atm	atmosphere
Bhp	Brake horse power
Btu	British thermal units
cfm	cubic feet per minute
dscfm	dry standard cubic feet per minute
°F	degree Fahrenheit
ft	feet
g	grams
g/s	grams per second
gal	gallon
gr	grain
hp	horsepower
hr	hour
in	inches
K	degree Kelvin
kg	kilograms
km	kilometers
kW	kilowatt
L	liter
lb	pounds
m	meters
M	thousand
Mbf	thousand board feet
min	minute
MM	million
MMbf	million board feet
MMBtu	million British thermal units
ug	micrograms
ppb	parts per billion
ppm	parts per million
ppmvd	parts per million, dry volume
psi	pounds per square inch
s	second
scfm	standard cubic feet per minute
tpy	tons per year

Attachment 3

Emissions Review

Parameters:

Material Use Limit: 1,900 gallons/yr; of which up to 245 contain VOC content >3.5 lbs/gal

Density: 10.12 lbs/ gallon

Transfer Efficiency: 65%

Filter Efficiency: 98%

Emissions review based planned materials and a statistical air quality impact analysis of collective auto body spray coating operations within ORCAA's jurisdiction.

Pollutant	CAS #	AVG+1 STD DEV by weight in any given product	Average density of any given product	Annual Rate	Daily Rate	Hourly Rate	ASIL	Averaging Time	Modeled Impact (µg/m3)	Pass/Fail TAP REVIEW
		(%)	(lbs/gal)	(lbs/year)	(lbs/day)	(lbs/hr)	(µg/m ³)			
Cumene	98828	1.60%	10.12	307.7	0.84	0.11	400	Daily	5.0	Pass
Ethylbenzene	100414	5.93%	10.12	147.0	0.40	0.05	0.40	Annual	0.3995	Pass
Ethylene Glycol Monobutyl Ether	111762	3.00%	10.12	577.0	1.58	0.20	82	Daily	9.4	Pass
Formaldehyde	50000	0.22%	10.12	42.4	0.12	0.015	0.17	Annual	0.12	Pass
Isopropyl Alcohol (Isopropanol)	67630	20.00%	10.12	3846.4	10.54	1.32	3200	Hourly	13.1	Pass
Methyl Alcohol	67561	4.21%	10.12	810.0	2.22	0.28	20000	Daily	13.2	Pass
Methyl Ethyl Ketone	78933	13.00%	10.12	2500.1	6.85	0.86	5000	Daily	40.7	Pass
Methyl Isobutyl Ketone	108101	18.00%	10.12	3461.7	9.48	1.19	3000	Daily	56.4	Pass
Naphthalene	91203	0.31%	10.12	7.8	0.02	0.003	0.029	Annual	0.021	Pass
n-Hexane	110543	20.00%	10.12	3846.4	10.54	1.32	700	Daily	62.7	Pass
Styrene	100425	18.00%	10.12	3461.7	9.48	1.19	870	Daily	56.4	Pass
Toluene	108883	35.00%	10.12	6731.2	18.44	2.31	5000	Daily	109.7	Pass
Xylenes	1330207	40.00%	10.12	7692.8	21.08	2.63	220	Daily	125.4	Pass

Attachment 4

SEPA Documents



**Olympic Region
Clean Air Agency**
2940-B Limited Lane NW
Olympia, WA 98502

1-800-422-5623 or
(360) 586-1044
Fax: (360) 491-6308
www.ORCAA.org

**Executive Director
Richard A. Stedman**

*Clean Air is
Everyone's
Business*

*Serving Clallam, Grays
Harbor, Jefferson, Mason,
Pacific and Thurston
counties.*

DETERMINATION OF NONSIGNIFICANCE (DNS) AND ADOPTION OF EXISTING ENVIRONMENTAL DOCUMENT Issue Date: December 8, 2006

Description of Proposal: Installation of a paint spraybooth
Proponent: Terry's Automotive, Inc.
Location of Proposal: 410 Ronlee Lane, Suite "C"
Title of Document Being Adopted: Thurston County Mitigated Determination of
Nonsignificance # 2004104218
Date Adopted Document Was Prepared: March 24, 2005
Description of Document Being Adopted: MDNS for Shoreline Substantial Development
Permit to construct three 4,000 square foot commercial buildings.
The Document is available to be read at:
Olympic Region Clean Air Agency
2940 B Limited Lane NW
Olympia, WA 98502

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. An Environmental Impact Statement (EIS) is not required under RCW 43.12C.030(2)(c). This decision was made after review of a completed environmental checklist and/or other information on file with the lead agency. This information is available to the public upon request.

- There is no comment period for this DNS.
- This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 14 days from the issue date.

<i>Name of Agency Adopting Document:</i>	Olympic Region Clean Air Agency
<i>Responsible Official:</i>	Richard A. Stedman
<i>Position/title:</i>	Executive Director
<i>Lead Agency Contact:</i>	John T. Kelly
<i>Position/title:</i>	Engineer 1
<i>E-mail:</i>	john@orcaa.org
<i>Telephone:</i>	(360) 586-1044, ext. 109
<i>Lead Agency Address:</i>	2940 B Limited Lane NW Olympia, WA 98502


If the document being adopted has been challenged (WAC197-11-630) please describe:

To the best of ORCAA's knowledge, this document has not been challenged.

Describe reason for adoption:

ORCAA received a Notice of Construction (NOC) application for the project on September 20, 2006. This new installation triggered the need for a threshold determination under the State Environmental Policy Act (SEPA). ORCAA informed Thurston County that they were the lead agency on November 30, 2006. Thurston County held that the county would require no further SEPA review. In order to expedite the review and approval of the project, on December 7, 2006 ORCAA informed Thurston County that it would assume lead agency status and issue a new threshold determination and adopt the existing Thurston County MDNS # 2004104218 issued on March 25, 2005 for construction of the building.

The MDNS was for the original construction of the building in which the spraybooth is to be installed. ORCAA has verified with the responsible official for Thurston County that no environmental impacts are likely from the project beyond those addressed in the original MDNS and in the review of the Notice of Construction.


ISSUED BY Richard A. Stedman, Executive Director 12/12/06
Date

Attachments:

- Thurston County MDNS # 2004104218
- ORCAA Form 1 - Notice of Construction application # 06NOC510

OLYMPIC REGION CLEAN AIR AGENCY

2940 Limited Lane NW - Olympia, Washington 98502 - 360-539-7610 – Fax 360-491-6308

FORM 1- NOTICE OF CONSTRUCTION TO CONSTRUCT - INSTALL - ESTABLISH OR MODIFY AN AIR CONTAMINANT SOURCE

Form 1 Instructions:

1. Please complete all the fields below. **This NOC application is considered incomplete until signed.**
2. If the application contains any confidential business information, please complete a Request of Confidentiality of Records (www.orcaa.org/forms).
3. Duty to Correction Application: An applicant has the duty to supplement or correct an application. Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application must, upon becoming aware of such failure or incorrect submittal, promptly submit supplementary factors or corrected information.

Business Name: DentCenter, LLC	For ORCAA use only File No: 174 County No: 67 Source No: 152 Application No: 23 NOC 1584 Date Received: <div style="text-align: center; color: red; font-weight: bold; font-size: 1.2em;"> Received FEB 02 2023 ORCAA </div>
Mailing Address: 410 Ronlee Ln NW Suite C. Olympia WA 98502	
Physical Address of Project or New Source: Same	
Billing Address: Same	
Project or Equipment to be installed/established: Established: Downdraft Paint booth	
Anticipated startup date: ___/___/___ Is facility currently registered with ORCAA? Yes <input type="checkbox"/> No <input type="checkbox"/>	
This project must meet the requirements of the State Environmental Policy Act (SEPA) before ORCAA can issue final approval. Indicate the SEPA compliance option: <input type="checkbox"/> SEPA was satisfied by _____ (government agency) on ___/___/___ (date) - Include a copy of the SEPA determination <input type="checkbox"/> SEPA threshold determination by _____ (government agency) is pending - Include a copy of the environmental checklist <input checked="" type="checkbox"/> ORCAA is the only government agency requiring a permit - Include ORCAA Environmental Checklist <input type="checkbox"/> This project is exempt from SEPA per _____ (WAC citation).	
Name of Owner of Business: Jose A. Vega	Agency Use Only <div style="text-align: center; font-weight: bold; font-size: 0.8em;"> CONDITIONALLY APPROVED FOR CONSTRUCTION ONLY IN ACCORDANCE WITH RCW 70A.15, WAC 173-400 ORCAA REGULATIONS (SEE ATTACHED ADDENDUM FOR CONDITIONS OF APPROVAL) </div> <div style="text-align: center; font-size: 1.2em; font-family: cursive;"> 9/7/2023 <hr/> DATE <hr/> ORCAA </div>
Title: Owner	
Email: jose@dentcenterusa.com	
Authorized Representative for Application (if different than owner):	
Title:	
Email:	
I hereby certify that the information contained in this application is, to the best of my knowledge, complete and correct.	
Signature of Owner or Authorized Representative: (sign in Blue Ink) Jose A. Vega	
Date: 1/26/22	
IMPORTANT: Do not send via email or other electronic means. ORCAA must receive Original, hardcopy, signed application and payment prior to processing application.	