

ORDER OF APPROVAL
NOTICE OF CONSTRUCTION 24NOC1635

ISSUED to TEC Equipment, Inc. on

MAR 05 2024

This Order of Approval ("Order") is issued in accordance with Olympic Region Clean Air Agency ("ORCAA") Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6.

Conditional approval to establish a truck spray coating operation controlled by a spray booth located at 2822 Marvin Rd NE, in Lacey ("Approved Location"), for operation solely as described in the associated Notice of Construction ("NOC") application 24NOC1635, is hereby GRANTED to TEC Equipment, Inc. ("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 the Approved Location and shall be 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current owners and operators of the equipment, and Applicant's heirs, successors and assigns unless amended or superseded by a subsequent Order issued by ORCAA or unless the equipment is permanently shut down.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 shall be 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 of the Revised Code of Washington, 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, subject to the following Conditions of Approval:

1. **Approved Equipment.** The truck spray coating operation as described in Notice of Construction application No. 24NOC1635 and the associated Final Determination is approved for construction and operation subject to conditions in this Order of Approval.
[Regulatory Basis: ORCAA 6.1(a); ORCAA 6.1.2(l); 40 CFR part 52.2470(c), Table 6]
2. **Preapproval Required.** Prior approval by ORCAA may be required for the following as specified in ORCAA Rule 6.1:
 - a. Construction, installation, or establishment of any stationary source;
 - b. Modification to any existing stationary source;

- c. Replacement or substantial alteration of emission control technology installed on an existing stationary source; or,
- d. Deviations from the approved plans, drawings, data, and specifications of the stationary sources listed in Table 1.

Table 1 Stationary sources located at TEC

| Emission Unit | Specifications: | Air Pollution Controls |
|---------------|--|--|
| Spray Booth | <ul style="list-style-type: none"> • Manufacturer: Standard Tool and Equipment Co. • Model: STSDD-161560-GH-C • Fully enclosed side downdraft truck spray booth • Booth dimensions: 16' width, 60' length, 15' 3-1/2" height | <ul style="list-style-type: none"> • Stack(s) 6' above roof line • Exhaust filtration system with combined efficiency demonstrated to achieve at least 98.6% capture of paint overspray. |

[Regulatory Basis: ORCAA 6.1(a); ORCAA 6.1.2(l); WAC 173-400-110(2); WAC 173-400-111(10)]

3. **Material Use Limits:** The owner or operator is approved to apply autobody finishing material intended for light duty passenger vehicles, trailers, and trucks. Application of finishing material intended for other types of vehicles or equipment, or applying finishing material to anything other than light duty passenger vehicles, trailers, and trucks requires prior approval through ORCAA. 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. 2,300 gallons for all VOC-containing materials.
- b. 120 gallons of Imron Industrial Strength White, or any other material containing tertiary butyl acetate (CAS 540-88-5). Materials containing tertiary butyl acetate are limited to 30% tertiary butyl acetate by weight as stated on the corresponding SDS.
- c. The facility may apply coating materials not listed in the 24NOC1635 application provided there are no TAP (as defined in WAC 173-460-150) present in the materials, as identified in the corresponding SDS. All new coating materials containing TAP require prior approval through ORCAA.
- d. The use of any material containing Methylene Chloride (CAS Number 75-09-2) cadmium, chromium, lead, nickel, or manganese is prohibited.

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

4. **Stack Requirements:** Exhaust stack(s) of the spray booth must have a vertical discharge to the atmosphere at least six feet above the peak height of the spray coating 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)]

5. **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 98.6 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]

6. **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]

7. **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.
- e. Records of daily filter checks for each operating day.

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

A. Manley

3/5/2024

PREPARED BY: Aaron Manley, PE

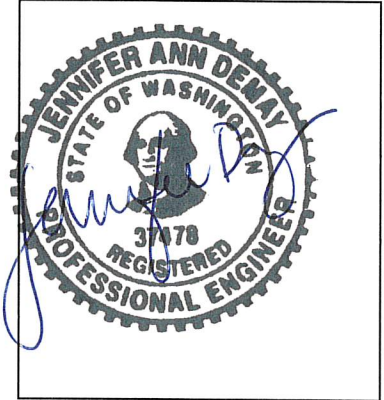
Date

Jennifer DeMay

3/5/2024

REVIEWED BY: Jennifer DeMay, PE

Date





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

(360) 539-7610
Or 1-800-422-5623
Fax: (360) 491-6308

www.ORCAA.org

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NEW SOURCE

FINAL DETERMINATION

to APPROVE:

**Truck Spray Coating Operation
Controlled by a Spray Booth**

TEC Equipment, Inc.

24NOC1635

February 27, 2024

Table of Contents

1. Summary1

2. Regulatory Background1

3. Facility Background.....2

4. Facility Description.....3

5. Project Description.....4

6. Emission Increases.....4

7. Administrative Requirements for NOC Applications.....5

8. SEPA Review5

9. Criteria for Approval.....5

10. Applicable Performance Standards (Summary).....6

11. Best Available Control Technology (BACT)7

12. Ambient Impact Analysis (Criteria Pollutants).....8

13. Ambient Impact Analysis (Toxic Air Pollutants).....9

14. Requirements for Major Stationary Sources and Major Modifications to Major
Stationary Sources12

15. Title V Air Operating Permit (AOP) Implications12

16. Environmental Justice Considerations.....12

17. Conditions of Approval.....14

18. Final Determination to Approve16



NOTICE OF CONSTRUCTION FINAL DETERMINATION TO APPROVE

Olympic Region Clean Air Agency

| | | | |
|-----------------------|------------------------------------|----------------|----------------------|
| Issued to: | TEC Equipment, Inc. | County: | Thurston - 67 |
| Location: | 2822 Marvin Rd NE Lacey | Source: | 135 |
| Application #: | 24NOC1635 | RC: | 4 |
| Prepared on: | February 27, 2024 | File: | 810 |

1. Summary

TEC Equipment, Inc. (TEC) seeks after the fact approval from Olympic Region Clean Air Agency (ORCAA) to establish a truck spray coating operation controlled by a spray booth at 2822 Marvin Rd NE, Lacey, Washington. Installing a truck spray coating operation will result in emissions of regulated air pollutants such as particulate matter (PM), volatile organic compounds (VOC), and toxic air pollutants (TAPs). Therefore, approval through ORCAA is required through a Notice of Construction permit. ORCAA staff reviewed TEC's proposal and concluded it may be conditionally approved. Recommended conditions of approval are detailed in Section 17 of this Final Determination report.

2. Regulatory Background

Pursuant to the Washington Clean Air Act under chapter 70A.15 of the Revised Code of Washington, ORCAA's Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c)¹ require New Source Review (NSR) for new stationary sources of air pollution (referred to as new sources) in ORCAA's jurisdiction. NSR is also required prior to installing, replacing, or substantially altering any air pollution control technology. NSR generally refers to the process of evaluating air quality impacts and the likelihood of compliance with applicable air regulations and standards. NSR and approval of an air permit by ORCAA is required prior to commencing construction or modification of any new source or prior to installing, replacing, or substantially altering air pollution control technology. The goal of NSR is to assure compliance with applicable air regulations and standards, including equipment performance standards and ambient air quality standards.

¹ A State Implementation Plan (SIP) is a collection of regulations and documents used by a state, territory, or local air district to implement, maintain, and enforce the National Ambient Air Quality Standards, or NAAQS, and to fulfill other requirements of the federal Clean Air Act. The Clean Air Act requires the EPA to review and approve all SIPs. ORCAA's SIP was last approved by EPA in 1995.

NSR is initiated by a project proponent submitting an air permit application referred to as Notice of Construction (NOC) application², which provides ORCAA information on the proposed project of sufficient detail to characterize air impacts. NOC 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 in an attainment or unclassifiable area³ is contingent on verifying a proposed project meets the following criteria from ORCAA's Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6:

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 RCW;
2. **BACT** - The new stationary source will employ "Best Available Control Technology" (BACT) to control all air pollutants emitted;
3. **RACT** – Replaced or substantially altered air pollution control technology meets the standard of "Reasonably Available Control Technology" (RACT) as defined in ORCAA Rule 1.4;
4. **Ambient Air Quality** – Emissions from the new stationary source will not cause or contribute to a violation of any ambient air quality standard;
5. **Federal Air Permitting Requirements** - The new stationary source secures all applicable federal air permits that may apply; and,
6. **Air Toxics** - 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.

In this case, TEC is proposing to install a truck spray coating operation controlled by a spray booth at their facility located in Lacey, Washington. The proposed spray coating operation includes spray application of paints and other coatings to trucks and subassemblies which generates emissions of volatile organic compounds including toxic air pollutants. The operation is considered a new stationary source and requires ORCAA's approval through a NOC application prior to commencement of construction.

3. Facility Background

TEC's facility is a new 'greenfield' facility. There were no known prior facilities or activities at this location.

² There are two categories of NOC applications: Notice of Construction (NOC) and Notice of Construction Revision (NOR). NOCs are required for new or modified sources, new control technology, replacing an existing stationary source or control technology, and substantially altering control technology. NORs are required when an owner or operator requests a revision to an existing air permit issued by ORCAA.

³ Unclassified area or "attainment area" means an area that has not otherwise been designated by EPA as nonattainment with ambient air quality standards for a particular regulated pollutant. Attainment area means any geographic area in which levels of a given criteria air pollutant (e.g., ozone, carbon monoxide, PM10, PM2.5, and nitrogen dioxide) meet the health-based National Ambient Air Quality Standards (NAAQS) for that pollutant. An area may be an attainment area for one pollutant and a nonattainment area for others.

4. Facility Description

TEC is a new truck and trailer sales, service, and repair facility. Surrounding properties are commercial and light industrial in nature. The nearest residence appears to be over a quarter mile away.

Figure 4.1: Facility Location



* Imagery ©2024 Airbus, CNES/ Airbus, Landsat/ Copernicus, Maxar Technologies, U.S. Geological Survey, USDA/FPAC/GEO, Map data ©2024
** Annotated by ORCAA

Figure 4.2: Site Map



* Imagery ©2024 Airbus, CNES/ Airbus, Maxar Technologies, U.S. Geological Survey, USDA/FPAC/GEO, Map data ©2024
** Annotated by ORCAA

5. Project Description

Trucks 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 (24NOC1635) includes details on the equipment, which are summarized in Table 5.1.

Table 5.1: New Equipment

| Equipment | Description |
|-------------|--|
| Spray Booth | <ul style="list-style-type: none"> • Manufacturer: Standard Tool and Equipment Co. • Model: STSDD-161560-GH-C • Fully enclosed side downdraft truck spray booth • Booth dimensions: 16' width, 60' length, 15' 3-1/2" height • Stack heights at least 6' above highest height of spray coating building roofline • Denser W-152A woven polyfiber filters with average arrestance of at least 98.6% |

6. Emission Increases

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 spray coating operations are uncontrolled as VOC exist at ambient temperatures and pressures as gases and, therefore, can't be filtered out of an air stream.

ORCAA staff calculated emissions based on an as-reviewed limit of 2300 gallons per year. The application requested approval for 2125 gallons per year, so the as-reviewed limit will give the facility some product usage flexibility.

Table 6.1. Emission Increases (Project Emissions)

| Pollutant | Classification (Criteria ^a /HAP ^b /TAP ^c) | Emission Rate (lb/yr) | Emission Rate (lb/day) | Emission Rate (lb/hr) |
|---|--|-----------------------------|------------------------------|-----------------------------|
| PM (Total Particulate) | N/A | 2.62E+01 | 7.17E-02 | 2.99E-03 |
| PM ₁₀ (Total Particulate) (<= 10) | Criteria | 2.62E+01 | 7.17E-02 | 2.99E-03 |
| PM _{2.5} (Fine Particulate (<=2.5)) | Criteria | 2.62E+01 | 7.17E-02 | 2.99E-03 |
| VOC ^d (Volatile Organic Compounds) | N/A | 1.96E+04 | 5.38E+01 | 2.24E+00 |
| Hazardous Air Pollutants (total HAP) | HAP | 9.44E+02 | 2.59E+00 | 1.08E-01 |
| Toxic Air Pollutants (total TAP) | TAP | 1.56E+03 | 4.28E+00 | 1.78E-01 |

^a EPA has established national ambient air quality standards (NAAQS) for six of the most common air pollutants—carbon monoxide, lead, ground-level ozone, particulate matter, nitrogen dioxide, and sulfur dioxide—known as “criteria” air pollutants (or simply “criteria pollutants”).

^b HAP means Hazardous Air Pollutant. Hazardous Air Pollutants are those known to cause cancer and other serious health impacts and are regulated under the federal Clean Air Act.

^c TAP means any toxic air pollutant regulated in Washington and listed in WAC 173-460-150. See Table 13.1 for emission calculations for individual TAPs.

^d VOC is regulated as a Criteria Air Pollutant because it is a precursor to Ground Level Ozone (O₃)

7. Administrative Requirements for NOC Applications

NOC applications are subject to filing fees according to ORCAA Rule 3.3(b) and may incur additional NOC processing fees at an hourly rate according to ORCAA Rule 3.3(c). Applicable NOC filing fees for TEC's NOC application were paid prior to ORCAA commencing processing of the application. Additional NOC processing fees may apply and will be determined and assessed prior to issuing a Final Determination and the Approval Order (a.k.a.: Air Permit).

NOC applications are subject to a 15-day public notice and an opportunity to request a 30-day public comment period and opportunity for a public hearing. Public notice of TEC's NOC application was posted on ORCAA's website on January 25, 2024. The time period for filing comments on the application and requests for a public comment period expired on February 9, 2024. There were no comments nor requests for a public hearing.

8. SEPA Review

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. The goal of SEPA is to assure that significant impacts are mitigated.

On October 19, 2020 the City of Lacey issued a SEPA Determination of Nonsignificance (DNS) #20-59 for the project. The applicant included a copy of the DNS in their application.

9. Criteria for Approval

ORCAA's Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6, establish the following general criteria for approving new stationary sources and modifications to existing stationary sources of air pollution in ORCAA's region:

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 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 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 ORCAA's regulations and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6 are met.

The following sections provide more detail on each criterion.

10. Applicable Performance Standards (Summary)

ORCAA’s Rule 6.1.4(a)(1) and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6, require a finding that any new or modified stationary source will likely comply with applicable state, federal and local performance standards for air emissions including emission standards adopted under chapter 70A.15 RCW, emissions standard 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 only applicable federal regulation that applies to TEC 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.

The performance standards in Table 10.1 were determined applicable to the proposed truck spray coating operation. A comprehensive list of applicable performance standards that apply to all stationary sources of air pollution located at the facility, as well as general air regulations and standards that apply, are included in the Appendix.

Table 10.1: Applicable Performance Standards to the Proposed Spray Coating Operation

| Title Citation | Brief Description (Consult rule/regulation for specific requirements) | discussion/determination |
|---|---|---|
| <i>40 CFR Part 63, Subpart HHHHHH (6H)</i> <i>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. Information on how to apply for an exemption are included in the appendix. |
| General Requirements WAC 173-400-040(1)(c) ORCAA Rule 8.3 | All emissions units are required to use reasonably available control technology (RACT). | Applies generally to all air pollution sources. |
| Visible Emissions WAC 173-400-040(2) ORCAA Rule 8.2(a) | Prohibits emissions with opacity of greater than 20% for more than three (3) minutes in any one hour. | Applies generally to all air pollution sources |
| Control 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. | Applies generally to all air pollution control devices. |
| Odor WAC 173-400-040(5) ORCAA Rule 8.5 | 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. | Applies generally to all air pollution sources. |

| Title Citation | Brief Description (Consult rule/regulation for specific requirements) | discussion/determination |
|--|--|--|
| Emissions Detrimental to Persons or Property WAC 173-400-040(6) ORCAA Rule 7.6 | 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. | Applies generally to all air pollution sources |
| Concealment and Masking WAC 173-400-040(8) ORCAA Rule 7.5 | 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. | Applies generally to all air pollution sources |
| Fugitive Emissions WAC 173-400-040(4)(a) ORCAA Rule 8.3(c) | 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. | Applies generally to all fugitive emission sources |
| Excess Emissions Provisions WAC 173-400-107; WAC 173-400-108 ORCAA 8.7 | Requires excess emissions be reported to the Authority as soon as possible and within 24 hours and establishes criteria qualifying excess emissions as unavoidable. | Applies generally to all air pollution sources |
| 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. | Required of all facilities registered with ORCAA. |
| Particulate Matter (process units) WAC 173-400-060 ORCAA Rule 8.3(a) | No person shall cause or allow the emission of particulate material from any general process operation in excess of 0.23 grams per dry cubic meter at standard conditions (0.1 grain/dscf) of exhaust gas. | Applies generally to all air process sources. |
| Fallout WAC 173-400-040(3) ORCAA Rule 8.3(e) | 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. | Applies generally to all air process sources. |
| 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. | Applies generally to all air process sources. |

11. Best Available Control Technology (BACT)

ORCAA Rule 6.1.4(a)(2) and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6, require the finding that a new source or modification to an existing source of air pollution in an attainment or unclassifiable area will employ best available control technology for all pollutants (BACT) not previously emitted or whose emissions would increase as a result of the new source or modification.

New sources of air pollution and modifications to existing sources of air pollution are required to use BACT to control all pollutants not previously emitted, or those for which emissions would

increase as a result of the new source or modification. BACT is defined in WAC 173-400-030 as, “an emission limitation based on the maximum degree of reduction for each air pollutant subject to regulation under chapter 70A.15 RCW emitted from or which results from any new or modified stationary source, which the permitting authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes and available methods, systems, and techniques, including fuel cleaning, clean fuels, or treatment or innovative fuel combustion techniques for control of each pollutant.”

The air pollution prevention measures and controls proposed by TEC 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.

12. Ambient Impact Analysis (Criteria Pollutants)

ORCAA’s Rule 6.1.4(a)(3) and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6, require emissions from any new stationary source or modification not delay the attainment date of an area not in attainment, nor cause or contribute to a 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 any pollutant with an ambient standard is above ORCAA’s adopted significant emission level for the pollutant. Any pollutant with a PTE below its significant emission level can be considered insignificant with respect to maintaining the AAQSs.

The following table shows ORCAA’s current significant emissions levels compared to TEC’s PTE. As can be seen from this comparison, TEC’s emissions are less than ORCAA’s adopted significance thresholds. Based on this result, ORCAA’s determination is that TEC’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 12.1 Criteria Pollutant Significant Emissions Comparison

| Pollutant | Significant Emissions Threshold (PTE) | TEC 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 |

13. Ambient Impact Analysis (Toxic Air Pollutants)

Washington's regulation titled Controls for New Sources of Toxic Air Pollutants (Air Toxics Rule) under Chapter 173-460 of the Washington Administrative Code applies to new stationary sources of Toxic Air Pollutants (TAP), including modifications to existing emissions units that increase TAP. The purpose of the Air Toxics Rule is to, "... maintain such levels of air quality as will protect human health and safety." The TAPs covered under the Air Toxics Rule include carcinogens and non-carcinogens. TAP emissions increases for determining applicability are the increases attributable to the new or modified emissions unit - Decreases from existing emissions units are not allowed to be subtracted from project-attributable TAP increases when determining applicability. Also, the Air Toxics Rule provides that review of modifications are limited to the emission unit or units proposed to be modified and the TAPs whose emissions would increase as a result of the modification.

The Air Toxics Rule has two independent requirements for new sources and modifications that increase TAP emissions above de-minimis levels:

- 1) **tBACT:** The new or modified emission units must use Best Available Control Technology to control TAP emissions (WAC 173-460-040(3)(a)).
- 2) **Ambient Impact:** The NOC application must demonstrate that any increase in TAP from the new or modified emission units are sufficiently low to protect human health and safety from potential carcinogenic and/or other toxic effects (WAC 173-460-070).

tBACT

The tBACT requirement applies to any new or modified emission units that triggers the Air Toxics Rule (results in a TAP increase above de-minimis levels), regardless of facility-wide or "net" TAP emissions. The term tBACT means Best Available Control Technology, as that term is defined in WAC 173-400-030, but applied to control of TAP (see BACT definition in Section 11).

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

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

Ambient Impact Review

The Air Toxics Rule provides a multi-tiered, screening approach under WAC 173-460-080 to assess health impacts and demonstrate compliance with the ambient impact requirement under WAC 173-460-070, which is that TAP increases must be sufficiently low to protect human health and safety from potential carcinogenic and/or other toxic effects.

The "First Tier Review" (Tier 1 Review) is a two-step process. First, the emissions increase of each TAP is compared to its unique Small Quantity Emission Rate (SQER). SQERs are listed for

each TAP under WAC 173-460-150. An SQER is the level of emissions of a TAP below which dispersion modeling is not required to demonstrate compliance with the ambient impact requirement. TAP emissions increases used in this first step must be based on the maximum potential to emit considering control or reduction in emissions achievable using the air pollution control technology or methods proposed to meet the tBACT requirement. Any TAP with an increase below its SQER can be presumed to be in compliance with the ambient impact requirement. If this is the outcome, further analysis is not required for that TAP. However, TAPs with emissions increases above their SQER must undergo the second step of the Tier 1 Review.

The second step of the Tier 1 Review requires evaluating TAP impacts against Acceptable Source Impact Levels (ASIL) and is referred to as an ASIL Analysis. An ASIL is the adopted health-based concentration for a TAP below which can be presumed as meeting the ambient impact requirement of WAC 173-460-070. ASILs are provided for each TAP under WAC 173-460-150. An ASIL analysis typically involves using an ambient air dispersion model to estimate ambient concentrations resulting from TAP emissions increases and considering air dispersion and local meteorological characteristics of the source. If the modeled impact of the increase in emissions of a TAP does not exceed its corresponding ASIL, the ambient impact requirement of WAC 173-460-070 may be considered met and the First Tier Review is completed for that TAP.

Emissions rates used to support an ASIL Analysis must be based on the maximum potential to emit considering control or reduction in emissions achievable using the air pollution control technology or methods proposed to meet the tBACT requirement. In addition, the Air Toxics Rule allows TAP reductions from existing emission units not subject to review to be subtracted or “netted out” from TAP increases, provided the reductions are included in the approval order as enforceable voluntary emission limits and meet all the requirements of WAC 173-460-071. These requirements include:

- (1) The voluntary emissions reductions must be enforceable through a regulatory order issued by the air permitting agency.
- (2) The approval order enforcing the voluntary emissions reductions must include monitoring, recordkeeping, and reporting requirements sufficient to ensure the reductions are maintained.
- (3) The agency’s preliminary determination to approve the voluntary emissions reductions are subject to a 30-day public notice and comment period and opportunity for a public hearing.

For pollutants with ambient concentrations found to be greater than their ASIL, a “Second Tier Review” (Tier 2 Review) by the Washington Department of Ecology (Ecology) is required. An application for a Tier 2 Review by Ecology is referred to a Tier 2 petition. Tier 2 petitions must include a Health Impacts Assessment (HRA) and estimated ambient TAP impacts based on refined air dispersion modeling. Ecology will not act on a Tier 2 petition unless a written preliminary determination on the NOC application for the new or modified TAP source and a draft approval order have been completed by the local agency with jurisdiction. Ecology’s review and approval of a Tier 2 petition is contingent on a finding that TAP impacts meet the ambient impact requirement of WAC 173-460-070 that increases in TAP emissions are sufficiently low to protect human health and safety from potential carcinogenic and/or other toxic effects. If Ecology recommends denial of a Tier 2 petition, the permitting authority may

not approve the project. The applicant then has the option of submitting a petition for a “Third Tier Review” (Tier 3 Review) by Ecology and a request for a risk management decision.

ORCAA staff calculated emissions based on an as-reviewed limit of 2300 gallons of VOC-containing materials per year. Table 13.1 demonstrates all TAP emissions associated with the project are emitted below their respective SQER except for Tertiary-butyl acetate (associated with the coating Imron Industrial Strength White 9T11). ORCAA staff limited Imron Industrial Strength White 9T11 to 120 gallons per year for the purposes of demonstrating compliance with the ASILs, though the applicant believes they will likely use only 5 gallons in a given year. Since tertiary-butyl acetate emissions were above their respective SQER, ORCAA staff modeled emissions and compared its predicted ambient concentrations to the respective ASIL in WAC 173-460-150. As presented in Table 13.2, ambient concentrations of tertiary-butyl acetate were below their respective ASIL.

Since all project-related TAP were found to be emitted below their respective SQER or their modeled concentrations found to be below their respective ASIL, it can therefore be concluded all TAP associated with the project meet the Ambient Impact Review requirements of Chapter 173-460.

Table 13.1 SQER Review

| Pollutant | CAS # | SQER | | | PTE Estimates | | | SQER Review |
|---------------------------------|---------|--------|-----------|--------|-----------------|-------------|-------------|--------------|
| | | | | | Annual Rate | Daily Rate | Hourly Rate | |
| | | lbs/yr | lbs/24-hr | lbs/hr | (lbs/yr) | (lbs/24-hr) | (lbs/hour) | pass/model |
| 1,3,5 Trimethylbenzene | 108678 | - | 4.4 | - | 2.37E+01 | 6.50E-02 | 2.71E-03 | pass |
| Cumene | 92828 | - | 30 | - | 4.48E+01 | 1.23E-01 | 5.12E-03 | pass |
| Di(2-ethylhexyl)phthalate | 117817 | 68 | - | - | 1.68E+01 | 4.59E-02 | 1.91E-03 | pass |
| Ethylbenzene | 100414 | 65 | - | - | 5.50E+01 | 1.51E-01 | 6.28E-03 | pass |
| Ethylene glycol monobutyl ether | 111762 | - | 6.1 | - | 2.63E+01 | 7.20E-02 | 3.00E-03 | pass |
| Fluorides | - | - | 0.96 | - | 3.10E+01 | 8.50E-02 | 3.54E-03 | pass |
| Isopropanol | 67630 | - | - | 5.9 | 5.69E+02 | 1.56E+00 | 6.50E-02 | pass |
| Methyl Isobutyl Ketone | 108101 | - | 220 | - | 4.56E+02 | 1.25E+00 | 5.20E-02 | pass |
| Methyl Methacrylate | 80626 | - | 52 | - | 4.75E+00 | 1.30E-02 | 5.42E-04 | pass |
| Tertiary-butyl acetate | 540885 | 120 | - | - | 3.84E+02 | 1.05E+00 | 4.38E-02 | model |
| Toluene | 108883 | - | 370 | - | 1.99E+02 | 5.46E-01 | 2.27E-02 | pass |
| Xylenes | 1330207 | - | 16 | - | 1.68E+02 | 4.59E-01 | 1.91E-02 | pass |

Table 13.2 ASIL Review

| Pollutant | CAS # | ASIL | Model Results | Tier I Review |
|------------------------|--------|------------------------------|------------------------------|---------------|
| | | ($\mu\text{g}/\text{m}^3$) | ($\mu\text{g}/\text{m}^3$) | pass/fail |
| Tertiary-butyl acetate | 540885 | 7.7E-01 | 7.6E-01 | pass |

14. Requirements for Major Stationary Sources and Major Modifications to Major Stationary Sources

Projects that are major stationary sources and major modifications to major stationary sources as defined in 40 CFR 52.21(b) may be subject to permitting requirements under WAC 173-400-700 through 173-400-860.

TEC is not a “Major Stationary Source” as defined in 40 CFR 52.21(b) and not subject to the permitting program required by WAC 173-400-700 through WAC 173-400-860. Therefore, these permitting requirements do not apply.

15. Title V Air Operating Permit (AOP) Implications

The State of Washington program pursuant to Title V of the federal Clean Air Act is governed under Chapter 173-401 WAC, the Washington Air Operating Permit Program. Chapter 173-401 WAC requires existing major stationary sources to operate in compliance with an approved Air Operating Permit (AOP). Major stationary sources are those stationary sources with a potential to emit which is greater than 100 tons per year of any criteria pollutant, greater than 10 tons per year of any hazardous air pollutants (HAP), or greater than 25 tons per year of any combination of HAP.

TEC is not a “Major Source” under the Title V program and is not subject to the requirement to operate under an AOP.

16. Environmental Justice Considerations

EPA defines Environmental Justice (EJ) as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. The purpose of an EJ review in conjunction with an air permitting action is to ensure no group of people bear a disproportionate share of the negative environmental consequences as the result of the permitting action. Further, ORCAA strives to engage the affected community effectively and meaningfully regarding the permitting action, and to ensure compliance with obligations pursuant to Title VI of the Civil Rights Act. With respect to factoring EJ into air permitting decisions, EPA Region 10 expects air agencies to:

- Identify overburdened communities;
- Engage with communities;

- Evaluate cumulative impacts; and,
- Use available authority to minimize emissions.

However, EPA Region 10 does not expect air agencies to use the Clean Air Act's authorities to address existing disproportional impacts to communities when implementing New Source Review in areas that are "attainment/unclassifiable" with respect to meeting the NAAQS.

The following subsections describe how these expectations from EPA Region 10 were met.

16.1 Identify Overburdened Communities

The initial step in an EJ review is to identify any affected populations or communities of concern and to identify whether they are disproportionately impacted. ORCAA used EPA's environmental justice screening and mapping tool, EJScreen, to answer this first part of this question. An EJScreen Community Report was generated for Thurston County. The Community Report estimates a minority population of 27%, with approximately 4% of the total population speaking Spanish and 8% speaking another Non-English language at home. All demographic indicators were below the 80th percentile for the nation. Likewise, the Community Report indicates that Thurston County is below the 80th percentile for all environmental indicators. Environmental indicators above the 80th percentile are an indication that a community is already disproportionately impacted. Therefore, ORCAA staff's conclusion is that the project impact area does not include any preexisting, overburdened communities. A copy of the Community Report with more detailed information will be filed as part of the supporting documentation for the project.

Preexisting air quality impacts were evaluated based on ambient air quality monitoring data and designation of the area with respect to maintaining compliance with the NAAQS. If air quality in a geographic area meets or is cleaner than a national standard based on ambient air monitoring data, it is called an attainment area and designated "attainment/unclassifiable." Areas may also be presumed "attainment/unclassifiable" based on population density and air pollutant emissions being below certain thresholds. For this case, the project impact area and Thurston County as a whole is designated "attainment/unclassifiable." Therefore, there are no preexisting nonattainment issues identified within the County. The project's criteria emissions will not cause or contribute to a violation of an AAQS. Therefore, ORCAA staff's conclusion is that there are no indications of any existing disproportional impacts to communities of concern within the project impact area.

16.2 Engage with Communities

Based on the size and scope of the project, and that there are no overburdened communities near the project, ORCAA staff determined the public noticing procedures outlined in Section 7 above are sufficient notifications.

16.3 Evaluate Cumulative Impacts

The air permitting action for this case did not trigger a cumulative impacts analysis under either the Clean Air Act or the Washington Clean Air Act. As demonstrated in Section 12 above, TEC's

PTE of all criteria pollutants were found to be emitted below their associated threshold identified in ORCAA’s dispersion modeling guidance and it can be concluded the project will not contribute to an exceedance of any NAAQS.

16.4 Use Available Authority to Minimize Emissions

As described elsewhere in this report, ORCAA applied existing New Source Review authorities provided under the Clean Air Act and the Washington Clean Air Act to minimize emissions from the truck spray coating project. Principally among these authorities is the requirement to use BACT for controlling emissions. The BACT requirement was applied and corresponding BACT emissions limits are included in the air permit.

17. Conditions of Approval

The following conditions of approval were determined necessary for assuring compliance with applicable air regulations and standards and protecting air quality. Recommended conditions of approval will become effective once the Approval Order is issued:

1. **Approved Equipment.** The truck spray coating operation as described in Notice of Construction application No. 24NOC1635 and the associated Final Determination is approved for construction and operation subject to conditions in this Order of Approval. [Regulatory Basis: ORCAA 6.1(a); ORCAA 6.1.2(l); 40 CFR part 52.2470(c), Table 6]
2. **Preapproval Required.** Prior approval by ORCAA may be required for the following as specified in ORCAA Rule 6.1:
 - a. Construction, installation, or establishment of any stationary source;
 - b. Modification to any existing stationary source;
 - c. Replacement or substantial alteration of emission control technology installed on an existing stationary source; or,
 - d. Deviations from the approved plans, drawings, data, and specifications of the stationary sources listed in Table 1.

Table 1 Stationary sources located at TEC

| Emission Unit | Specifications: | Air Pollution Controls |
|---------------|--|--|
| Spray Booth | <ul style="list-style-type: none"> • Manufacturer: Standard Tool and Equipment Co. • Model: STSDD-161560-GH-C • Fully enclosed side downdraft truck spray booth • Booth dimensions: 16’ width, 60’ length, 15’ 3-1/2” height | <ul style="list-style-type: none"> • Stack(s) 6’ above roof line • Exhaust filtration system with combined efficiency demonstrated to achieve at least 98.6% capture of paint overspray. |

[Regulatory Basis: ORCAA 6.1(a); ORCAA 6.1.2(l); WAC 173-400-110(2); WAC 173-400-111(10)]

3. **Material Use Limits:** The owner or operator is approved to apply autobody finishing material intended for light duty passenger vehicles, trailers, and trucks. Application of

finishing material intended for other types of vehicles or equipment, or applying finishing material to anything other than light duty passenger vehicles, trailers, and trucks requires prior approval through ORCAA. 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. 2,300 gallons for all VOC-containing materials.
- b. 120 gallons of Imron Industrial Strength White, or any other material containing tertiary butyl acetate (CAS 540-88-5). Materials containing tertiary butyl acetate are limited to 30% tertiary butyl acetate by weight as stated on the corresponding SDS.
- c. The facility may apply coating materials not listed in the 24NOC1635 application provided there are no TAP (as defined in WAC 173-460-150) present in the materials, as identified in the corresponding SDS. All new coating materials containing TAP require prior approval through ORCAA.
- d. The use of any material containing Methylene Chloride (CAS Number 75-09-2) cadmium, chromium, lead, nickel, or manganese is prohibited.

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

4. **Stack Requirements:** Exhaust stack(s) of the spray booth must have a vertical discharge to the atmosphere at least six feet above the peak height of the spray coating 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)]

5. **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 98.6 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]

6. **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]

7. **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.
- e. Records of daily filter checks for each operating day.

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

18. Final Determination to Approve

This Final Determination documents ORCAA staff's determinations with respect to the applicable criteria of approval in ORCAA Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6. ORCAA staff recommends approval of TEC's proposed truck spray coating operation, provided the conditions identified in Section 17 of this Final Determination are implemented through an enforceable Order of Approval (AKA: Air Permit). Emissions calculations, modeling summary and other data supporting this Final Determination are provided as attachments.

~ end of section ~

 3/5/2024

PREPARED BY: Aaron Manley, PE Date

 3/5/2024

REVIEWED BY: Jennifer DeMay, PE Date

Attachments

Applicable Performance Standards that apply to TEC

| Title Citation | Brief Description (Consult rule/regulation for specific requirements) | Applies to |
|--|--|---|
| Registration ORCAA Regulation 4 | Requires facilities that are minor sources of emissions to register annually with ORCAA and pay annual registration fees. | TEC will continue to be a minor source requiring registration. |
| Annual Registration Fees ORCAA Rule 3.1 | Requires payment of annual registration fees to ORCAA based in part on air pollutants emitted during the previous year. | TEC is required to register and pay annual registration fees. |
| Initial Notification ORCAA Rule 4.3(a)&(b); 4.3(f) | 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. The notification must be signed by the owner or operator or by the agent appointed by the owner. | |
| Administrative Change Notification ORCAA Rule 4.3(e); 4.3(f) | 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. The notification must be signed by the owner or operator or by the agent appointed by the owner. | |
| Annual and/or Periodic Reports ORCAA Rule 4.3(c)&(d); 4.3(f) | 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. The submittal must be signed by the owner or operator or by the agent appointed by the owner. | |
| Interference or Obstruction ORCAA Rule 7.1 | Prohibits willfully interfering with or obstructing the Executive Director or any Agency employee in performing any lawful duty. | Applies generally to all air pollution sources |
| 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. | Applies generally to all air pollution sources |
| 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. | Applies generally to all air pollution sources |
| 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 | The Approval Order issued in conjunction with this NOC approval must be retained on site. |

Attachments

| Title Citation | Brief Description (Consult rule/regulation for specific requirements) | Applies to |
|---|--|---|
| | 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 Executive Director. | |
| General Requirements WAC 173-400-040(1)(c) ORCAA Rule 8.3 | All emissions units are required to use reasonably available control technology (RACT). | Applies generally to all air pollution sources. |
| Visible Emissions WAC 173-400-040(2) ORCAA Rule 8.2(a) | Prohibits emissions with opacity of greater than 20% for more than three (3) minutes in any one hour. | Applies generally to all air pollution sources |
| 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. | Applies generally to facilities that emit Sulfur Dioxide. |
| Control 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. | Applies generally to all air pollution control devices. |
| Fallout WAC 173-400-040(3) ORCAA Rule 8.3(e) | 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. | Applies generally to all air pollution sources. |
| Fugitive Emissions WAC 173-400-040(4)(a) ORCAA Rule 8.3(c) | 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. | Applies generally to any activity that results in fugitive emissions. |
| Odor WAC 173-400-040(5) ORCAA Rule 8.5 | 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. | Applies generally to all air pollution sources. |
| Emissions Detrimental to Persons or Property WAC 173-400-040(6) ORCAA Rule 7.6 | 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. | Applies generally to all air pollution sources |
| Concealment and Masking WAC 173-400-040(8) ORCAA Rule 7.5 | 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. | Applies generally to all air pollution sources |
| 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 | Applies to any activity that results in fugitive dust. |

Attachments

| Title Citation | Brief Description (Consult rule/regulation for specific requirements) | Applies to |
|---|---|--|
| | becoming airborne and must maintain and operate the source to minimize emissions. | |
| Excess Emissions Provisions WAC 173-400-107; WAC 173-400-108 ORCAA 8.7 | Requires excess emissions be reported to the Agency as soon as possible and within 24 hours and establishes criteria qualifying excess emissions as unavoidable. | Applies generally to all air pollution sources |
| 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. | Required of all facilities registered with ORCAA. |
| 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. | Applies to generally to all stationary process units that exhaust to the atmosphere. |
| <i>40 CFR Part 63, Subpart HHHHHH (6H)</i> <i>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 to spray coating operations until granted exemption from EPA. |

Attachments

Instructions to Request an Exemption from 40 CFR Part 63 Subpart HHHHHH

[https://www.ecfr.gov/current/title-40/part-63/subpart-HHHHHH#p-63.11170\(a\)\(2\)](https://www.ecfr.gov/current/title-40/part-63/subpart-HHHHHH#p-63.11170(a)(2))

Please note: Obtaining an exemption from Subpart HHHHHH from EPA Region 10 does not exempt the owner or operator from any requirement of this permit.

Per 40 CFR 63.11170(a)(2), affected sources include facilities that perform spray application of coatings, as defined in [§ 63.11180](#), to motor vehicles and mobile equipment including operations that are located in stationary structures at fixed locations, and mobile repair and refinishing operations that travel to the customer's location, except spray coating applications that meet the definition of facility maintenance in [§ 63.11180](#). However, if you are the owner or operator of a motor vehicle or mobile equipment surface coating operation, you may petition EPA for an exemption from the surface coating provisions of Subpart HHHHHH if you can demonstrate, to the satisfaction of EPA, that you spray apply no coatings that contain the target HAP, as defined in [§ 63.11180](#). Petitions must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAP. If circumstances change such that you intend to spray apply coatings containing the target HAP, you must submit the initial notification required by [§ 63.11175](#) and comply with the requirements of Subpart HHHHHH. On and after May 9, 2023, you may submit a notification to EPA that you do not spray apply any target HAP containing coatings, as defined in [§ 63.11180](#), in place of a petition. You are still required to retain records that describe the coatings that are spray applied, but that information does not need to be reported to EPA. EPA maintains the authority to verify records retained on site, including whether the notification of exemption was sufficiently demonstrated. Alternatively, if you are the owner or operator of a motor vehicle or mobile equipment surface coating operation and you wish for a formal determination, you may still petition EPA for an exemption from Subpart HHHHHH.

Information on HHHHHH Exemption found at:

<https://www.epa.gov/collision-repair-campaign/about-epas-auto-body-rule>

The exemption request can be mailed to:

EPA Region X Director
Office of Air Quality
1200 6th Ave.
Suite 900, AWT-107
Seattle, WA 98101

Attachments

| | |
|------------------------------------|-------|
| Transfer Efficiency | 65% |
| Booth Filter Efficiency | 98.6% |
| Schedule days/yr | 365 |
| Schedule hrs/yr | 8760 |
| Schedule wks/yr | 52 |
| Cumulative Material Limit (gal/yr) | 2300 |

Product Usage Calculations

| Index | Product Name | Estimated Material Usage (gal/yr) | Prorated Usage (gal/yr) | Product Specific Gravity | Density (lbs/gallon) | Potential (lbs/yr) | VOC (lbs/gal) | Max %VOC (by wt) | Max %Solid (by wt) | Uncontrolled PTE VOC (tons/yr) | Uncontrolled PTE PM (tons/yr) | Controlled PTE PM (tons/yr) |
|--------------|---|-----------------------------------|-------------------------|--------------------------|----------------------|--------------------|---------------|------------------|--------------------|--------------------------------|-------------------------------|-----------------------------|
| 1 | Imron 2.1HG Plus 133-67632-sds | 250 | 250.33 | | 11.71 | 2931.32 | 0.00 | 100% | 0% | 1.47 | 0.00 | 0.000 |
| 2 | Imron Activator GI_9TOO-A | 200 | 200.26 | | 9.82 | 1966.57 | 0.00 | 5% | 95% | 0.05 | 0.93 | 0.013 |
| 3 | Imron Basecoat Binder 8200E | 200 | 200.26 | 0.957 | 7.98 | 1598.36 | 7.98 | 100% | 0% | 0.80 | 0.00 | 0.000 |
| 4 | Imron Black N00001EX | 150 | 150.20 | 0.982 | 8.19 | 1230.09 | 8.19 | 100% | 0% | 0.62 | 0.00 | 0.000 |
| 5 | Imron Elite Clearcoat 8840S | 250 | 250.33 | 0.961 | 8.01 | 2006.30 | 8.01 | 100% | 0% | 1.00 | 0.00 | 0.000 |
| 6 | Imron Elite Yellow 45Pn2832 | 250 | 250.33 | 1.124 | 9.37 | 2346.60 | 9.37 | 100% | 0% | 1.17 | 0.00 | 0.000 |
| 7 | Imron Industrial Strength White 9T11 | 120 | 120.16 | 1.28 | 10.65 | 1279.69 | 10.65 | 100% | 0% | 0.64 | 0.00 | 0.000 |
| 8 | Imron Paint Additive 359S | 100 | 100.13 | 0.96 | 8.01 | 801.69 | 8.01 | 100% | 0% | 0.40 | 0.00 | 0.000 |
| 9 | Imron Elite Additive FS-32860 | 100 | 100.13 | 0.841 | 7.01 | 702.31 | 7.01 | 100% | 0% | 0.35 | 0.00 | 0.000 |
| 10 | Imron Elite Productive White 45N0006EX | 100 | 100.13 | 1.27 | 10.59 | 1060.56 | 10.59 | 100% | 0% | 0.53 | 0.00 | 0.000 |
| 11 | Imron Low VOC Cleaner | 50 | 50.07 | | 10.50 | 525.69 | 10.50 | 100% | 0% | 0.26 | 0.00 | 0.000 |
| 12 | Nason Primers, Sealers and Fillers 431-40 (Ex/Multiple) | 150 | 150.20 | 1.34 | 11.16 | 1676.02 | 11.16 | 100% | 0% | 0.84 | 0.00 | 0.000 |
| 13 | Imron Balancer | 75 | 75.10 | 0.98 | 8.21 | 616.30 | 8.21 | 100% | 0% | 0.31 | 0.00 | 0.000 |
| 14 | Rival White N0006RV35 | 250 | 250.33 | 1.09 | 9.12 | 2281.88 | 9.12 | 100% | 0% | 1.14 | 0.00 | 0.000 |
| 15 | Fillers, Binders, Tints | 52 | 52.07 | 1.09 | 9.12 | 474.63 | 9.12 | 100% | 0% | 0.24 | 0.00 | 0.000 |
| TOTAL | - | 2297.00 | 2300 | | - | 21498.01 | - | - | - | 9.81 | 0.93 | 1.31E-02 |

-VOC content not listed in most SDSs so conservatively assumed 100% VOC for calculations unless specified otherwise.

Attachments

TAP Calculations

| Product Index | Product Maximum Usage (lbs/yr) | Pollutant from Spray Coating | CAS # | Max Concentration % wt | Boiling Point Deg C | HAP? | TAP? | VOC or PM | PTE Estimates | | |
|---------------|--------------------------------|--|---------------|------------------------|---------------------|------------|------------|------------|----------------------|------------------------|---------------------|
| | | | | | | | | | Annual Rate (lbs/yr) | Daily Rate (lbs/24-hr) | Hourly Rate (lb/hr) |
| 15 | 474.63 | 1,3,5 Trimethylbenzene | 108678 | 5.00% | 170 | No | Yes | VOC | 2.37E+01 | 6.50E-02 | 2.71E-03 |
| TOTAL | | 1,3,5 Trimethylbenzene | 108678 | - | 170 | No | Yes | VOC | 2.37E+01 | 6.50E-02 | 2.71E-03 |
| 8 | 801.69 | Cumene | 98828 | 5.0% | 152 | Yes | Yes | VOC | 4.01E+01 | 1.10E-01 | 4.58E-03 |
| 15 | 474.63 | Cumene | 98828 | 1.0% | 152 | Yes | Yes | VOC | 4.75E+00 | 1.30E-02 | 5.42E-04 |
| TOTAL | | Cumene | 98828 | - | 152 | Yes | Yes | VOC | 4.48E+01 | 1.23E-01 | 5.12E-03 |
| 12 | 1676.02 | Di(2-ethylhexyl)phthalate | 117817 | 1.00% | 204 | Yes | Yes | VOC | 1.68E+01 | 4.59E-02 | 1.91E-03 |
| TOTAL | | Di(2-ethylhexyl)phthalate | 117817 | - | 204 | Yes | Yes | VOC | 1.68E+01 | 4.59E-02 | 1.91E-03 |
| 12 | 1676.02 | Ethylbenzene | 100414 | 3.0% | 136 | Yes | Yes | VOC | 5.03E+01 | 1.38E-01 | 5.74E-03 |
| 15 | 474.63 | Ethylbenzene | 100414 | 1.00% | 136 | Yes | Yes | VOC | 4.75E+00 | 1.30E-02 | 5.42E-04 |
| TOTAL | | Ethylbenzene | 100414 | - | 136 | Yes | Yes | VOC | 5.50E+01 | 1.51E-01 | 6.28E-03 |
| 11 | 525.69 | Ethylene glycol monobutyl ether | 111762 | 5.0% | 121 | No | Yes | VOC | 2.63E+01 | 7.20E-02 | 3.00E-03 |
| TOTAL | | Ethylene glycol monobutyl ether | 111762 | - | 121 | No | Yes | VOC | 2.63E+01 | 7.20E-02 | 3.00E-03 |
| 2 | 1966.57 | Fluorides | - | 1.58% | -188 | No | No | VOC | 3.10E+01 | 8.50E-02 | 3.54E-03 |
| | | Fluorides | - | | 156 | No | No | VOC | 3.10E+01 | 8.50E-02 | 3.54E-03 |
| 3 | 1598.36 | Isopropanol | 67630 | 22.0% | 82.5 | No | Yes | VOC | 3.52E+02 | 9.63E-01 | 4.01E-02 |
| 4 | 1230.09 | Isopropanol | 67630 | 3.00% | 82.5 | No | Yes | VOC | 3.69E+01 | 1.01E-01 | 4.21E-03 |
| 5 | 2006.30 | Isopropanol | 67630 | 3.00% | 82.5 | No | Yes | VOC | 6.02E+01 | 1.65E-01 | 6.87E-03 |
| 10 | 1060.56 | Isopropanol | 67630 | 1.50% | 82.5 | No | Yes | VOC | 1.59E+01 | 4.36E-02 | 1.82E-03 |
| 15 | 474.63 | Isopropanol | 67630 | 22.00% | 82.5 | No | Yes | VOC | 1.04E+02 | 2.86E-01 | 1.19E-02 |
| TOTAL | | Isopropanol | 67630 | - | 82.5 | No | Yes | VOC | 5.69E+02 | 1.56E+00 | 6.50E-02 |

Attachments

| | | | | | | | | | | | |
|--------------|---------|-------------------------------|----------------|--------|--------------|------------|------------|------------|-----------------|-----------------|-----------------|
| 4 | 1230.09 | Methyl Isobutyl Ketone | 108101 | 3.0% | 118 | Yes | Yes | VOC | 3.69E+01 | 1.01E-01 | 4.21E-03 |
| 12 | 1676.02 | Methyl Isobutyl Ketone | 108101 | 25.00% | 118 | Yes | Yes | VOC | 4.19E+02 | 1.15E+00 | 4.78E-02 |
| TOTAL | | Methyl Isobutyl Ketone | 108101 | - | 118 | Yes | Yes | VOC | 4.56E+02 | 1.25E+00 | 5.20E-02 |
| 15 | 474.63 | Methyl Methacrylate | 80626 | 1.00% | 101 | Yes | Yes | VOC | 4.75E+00 | 1.30E-02 | 5.42E-04 |
| TOTAL | | Methyl Methacrylate | 80626 | - | 101 | Yes | Yes | VOC | 4.75E+00 | 1.30E-02 | 5.42E-04 |
| 7 | 1279.69 | Tertiary-butyl acetate | 540885 | 30.0% | 97 | No | Yes | VOC | 3.84E+02 | 1.05E+00 | 4.38E-02 |
| | | Tertiary-butyl acetate | 540885 | | 97 | No | Yes | VOC | 3.84E+02 | 1.05E+00 | 4.38E-02 |
| 4 | 1230.09 | Toluene | 108883 | 1.9% | 110.6 | Yes | Yes | VOC | 2.34E+01 | 6.40E-02 | 2.67E-03 |
| 12 | 1676.02 | Toluene | 108883 | 10.00% | 110.6 | Yes | Yes | VOC | 1.68E+02 | 4.59E-01 | 1.91E-02 |
| 14 | 2281.88 | Toluene | 108883 | 0.30% | 110.6 | Yes | Yes | VOC | 6.85E+00 | 1.88E-02 | 7.81E-04 |
| 15 | 474.63 | Toluene | 108883 | 0.30% | 110.6 | Yes | Yes | VOC | 1.42E+00 | 3.90E-03 | 1.63E-04 |
| TOTAL | | Toluene | 108883 | - | 110.6 | Yes | Yes | VOC | 1.99E+02 | 5.46E-01 | 2.27E-02 |
| 12 | 1676.02 | Xylenes | 1330207 | 10.0% | 140 | Yes | Yes | VOC | 1.68E+02 | 4.59E-01 | 1.91E-02 |
| TOTAL | | Xylenes | 1330207 | - | 140 | Yes | Yes | VOC | 1.68E+02 | 4.59E-01 | 1.91E-02 |

OLYMPIA 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: TEC EQUIPMENT, INC | For ORCAA use only File No: 810 County No: 67 Source No: 135 Application No: 24NOC1635 |
| Mailing Address: 2800 MARVIN ROAD NE, LACEY, WA 98516 | Date Received: <div style="text-align: center; color: red; font-weight: bold;"> Received JAN 23 2024 ORCAA </div> |
| Physical Address of Project or New Source: 2822 MARVIN ROAD NE, LACEY, WA 98516 | Billing Address: 2800 MARVIN ROAD NE, LACEY, WA 98516 |
| Project or Equipment to be installed/established: TRUCK PAINT BOOTH | |
| Anticipated startup date: <u>02</u> / <u>01</u> / <u>24</u> Is facility currently registered with ORCAA? Yes <input checked="" 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 checked="" type="checkbox"/> SEPA was satisfied by <u>City of Lacey Community Development Department</u> (government agency) on <u>10/19/20</u> (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 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: David Thompson | Agency Use Only CONDITIONALLY APPROVED FOR CONSTRUCTION ONLY IN ACCORDANCE WITH RCW 70A.15, WAC 173-400 ORCAA REGULATIONS SEE ATTACHED ADDENDUM FOR CONDITIONS OF APPROVAL |
| Title: VP of Development | DATE: 3/5/2024 |
| Email: dothompson@tecequipment.com Phone: 503-515-9140 | |
| Authorized Representative for Application (if different than owner): Andrew Liu | DATE: _____ ORCAA |
| Title: Director | |
| Email: aliu@tecequipment.com Phone: 971-442-5707 | DATE: _____ |
| 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) | DATE: _____ |
| | |
| Date: 971-442-5707 | DATE: _____ |
| IMPORTANT: Do not send via email or other electronic means. ORCAA must receive Original, hardcopy, signed application and payment prior to processing application. | |