Statement of Basis for
Kenworth Truck Company - Renton
Air Operating Permit No. 17796
October 1, 2025

1 Purpose of this Statement of Basis

1.1 General

This document summarizes the legal and factual bases for the draft permit conditions in the Kenworth Truck Company (Renton) (hereafter known as Kenworth) air operating permit to be issued under the authority of the Washington Clean Air Act, Chapter 70A.15 Revised Code of Washington, Chapter 173-401 of the Washington Administrative Code and Puget Sound Clean Air Agency (PSCAA) Regulation I, Article 7. Unlike the permit, this document is not legally enforceable. It includes references to the applicable statutory or regulatory provisions that relate to Kenworth emissions to the atmosphere. In addition, this Statement of Basis provides a description of Kenworth activities and a compliance history.

2 Why Kenworth is an Air Operating Permit Source

Kenworth is required to have an air operating permit because the potential to emit volatile organic compounds (VOC) is in excess of 100 tons per year. Potential emissions of all hazardous air pollutants (HAPs) listed under Section 112(b) of the Federal Clean Air Act are below the applicability thresholds of 10 tons per year for any single HAP, or 25 tons per year for all HAP combined, so Kenworth is classified as an “area source” for HAP.

3 Source Description

3.1 Kenworth Operations that Pertain to Air Operating Permit

Kenworth operates a truck assembly facility on North 8th Street in Renton, Washington, that produces highway and off-highway trucks. Its primary Industrial Classifications is Heavy Duty Truck Manufacturing. The plant was completed in 1993 and began building trucks in May of 1993.

Historically, Kenworth has emitted significant quantities of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). Most of these emissions come from painting new trucks. Kenworth has accepted VOC and HAP emission caps. While production has greatly increased at the Renton plant, VOC emissions have increased at a commensurately lower rate because Kenworth has employed low VOC paint applications. The plant has not come close to its VOC cap originally approved in 1993 and increased in 1994 and 1997 to 383 tons during any consecutive 12-month period.

The Renton Plant is primarily an assembly line with supporting manufacturing operations. Plant operations include truck assembly lines, surface coating, testing facilities, offices, general plant operations and maintenance. Trucks are custom painted, assembled, and tested at this plant. Completed trucks are road tested and temporarily stored on-site prior to pick up by a vehicle transporter.

Plant non-emergency utilities use natural gas solely; however, alternate fuels such as liquid natural gas (LNG) and/or propane or other alternate fuels may be used in the future. Kenworth has two diesel engines that are used to power a fire suppression water pump and an

emergency generator. These engines are classified as existing, emergency, stationary compression ignition (CI), reciprocating internal combustions engines (RICE) and are regulated under Subpart ZZZZ of 40 CFR 63. The plant also includes a wastewater treatment facility, which discharges pretreated wastewater to the sanitary sewer under a King County Industrial Waste Program pre-treatment permit.

Coating operations generate the greatest amount of air pollutant emissions from the site and are a function of customer trends toward larger interiors, painting more components, adding a clear coat for paint longevity, color coating the chassis, sound proofing, etc. In addition, changes in production rates, paint chemistry, coating application technologies, fabrication materials and techniques can affect plant emissions in many ways that are currently unforeseeable.

Emissions will vary from year-to-year depending on the quantity of trucks and parts coated, and the types and quantities of coatings and solvents used. VOC emissions occur from the storage, handling, mixing, use, application equipment, enhanced drying, and cleanup of VOC-containing coatings and solvents. These emissions are accounted for on a facility-wide basis only.

3.2 Adjacent PACCAR facilities relative to the Kenworth AOP

The PACCAR Renton Campus has five facilities that are located within the same overall plant boundary. This includes the Kenworth Truck Company (Renton) which is addressed in this operating permit.

The Agency completed a review of the other four facilities to determine if the facility operations should be included in the Kenworth air operating permit. In a letter dated May 27, 2003, the Agency documented their determination regarding which operations would need to be included in the Kenworth operating permit (see Attachment A). It was determined that the first three facilities listed below are managed by PACCAR, the parent corporation for Kenworth, and are not operationally related to the truck production activities. Their presence at this site reflects the availability of space owned by PACCAR and is coincidental to the location of the truck manufacturing plant. More details on individual facilities are summarized below:

1. Kenworth Research and Development (KW R&D) facility is managed by PACCAR, the parent corporation for Kenworth, and is not operationally related to the truck production activities. R&D activities support the product development efforts of the Kenworth Truck Co., which includes plants in other locations. Therefore, it was determined that these activities would not be within the scope of the operating permit. If Kenworth decides to use R&D facilities to complete a manufacturing activity on a truck for delivery from the Renton plant (e.g. overflow or relief for equipment breakdown), then this conclusion would be invalid and the R&D facility would need to be included in the permit.
2. PACCAR Parts Warehouse and Division Offices (PPD) are managed by PACCAR, the parent corporation for Kenworth, and are not operationally related to the truck production activities. There are no operational linkages to the Kenworth-Renton truck production activities.
3. Information Technology Division (ITD) is managed by PACCAR, the parent corporation for Kenworth, and is not operationally related to the truck production activities. There are no operational linkages to the Kenworth-Renton truck production activities.
4. Active Transport truck delivery contractor operations are related to the truck production in that they are the delivery contractor for completed trucks. However, at the time of the determination, there were no regulated emission generating activities on this site. The

Agency has other operating permit sources which have contractors operating within the boundaries of their facility, and the owner of the source is responsible for the contractor's activities within the scope of their operating permit. For the Kenworth facility, it is a moot point, as the operations do not involve any regulated emission units or specific permit requirements under the operating permit. These activities can be considered within the scope of the operating permit (even though not specifically identified as an emission unit or activity), and their operations would only fall within the facility wide requirements of the permit.

3.3 Permitted Equipment and Operations

A review of new source permitting for the facility was conducted as summarized in Section 4.1 of this document.

4 Permitting History

4.1 New Source Review Permitting for the Facility

A summary of the new source review permitting at the facility is provided below. Many of the historical permits are obsolete since they have been cancelled and superseded by newer permits. However, this provides a history of activities at the facility and why existing limits are currently in place.

Notice of Construction 4212 (obsolete): On November 22, 1991, PACCAR submitted an NOC application for the construction of a heavy-duty Kenworth truck plant in Renton. The project scope included assembling and painting Kenworth trucks in four process areas (20 trucks/day): cab painting, chassis painting, touch-up painting, and small parts painting. In addition to the assembly and painting operation, proposed air emission sources included a pyrolytic oven, solvent recovery still, storage tanks and indoor fuel tank welding operations. The original application included a complete top-down best available control technology (BACT) analysis.

On January 6, 1992, during the course of PSCAA's review, EPA designated the area encompassing Renton as an ozone nonattainment area. As a result, PACCAR was required to submit additional information to demonstrate compliance with the Agency's regulations for new sources in nonattainment areas. This included:

- Demonstration that the lowest achievable emission rate (LAER) would be employed.
- Obtaining required VOC offsets – process changes at PACCAR's Seattle Kenworth plant were made to offset VOC emissions at the Renton plant.

Order of Approval No. 4212 was issued on March 2, 1992, for one 20 truck per day painting and assembly plant with four process areas (cab painting, chassis painting, touch-up painting, and small parts painting), a pyrolytic oven, a still, storage tanks, and fuel tank welding operations. Facility-wide limits were set at 85 tons per year of VOC emissions with a requirement to provide 94 tons per year in offsets. Process changes at PACCAR's Seattle Kenworth plant were made to obtain these necessary offsets with additional emission reductions banked (148 tons per year total). LAER included coating VOC content limits of 3.5 pounds per gallon (lb/gal) for the chassis paint, the exterior cab prime, the cab topcoat & clear coat, and the touch-up & repair process areas. For the interior cab prime and small parts process areas, VOC content limits were set at 6.0 lb/gal (applied with HVLP or equivalent) or 3.5 lb/gal when such coatings were developed.

Notice of Construction 4972 (obsolete): On June 29, 1993, Order of Approval No. 4972 was issued to Kenworth for the addition of three emission units inadvertently missed in the original Notice of Construction application. This included the following equipment:

- Bump and Grind Process Unit where fiberglass cab and sleeper surfaces are roughened in preparation for paint application. This was accomplished using hand sanders in an area which is partially enclosed by partitions. This is a downdraft booth rated at 32,000 cubic feet per minute (cfm) with dry filters to capture particulate matter emissions (no VOC solvents used in this area).
- Sand and repair process unit where painted cabs and sleepers that do not meet specifications are sent so that flawed surfaces can be sanded. This is a downdraft booth rated at 33,400 cfm with dry filters to capture particulate matter emissions (no VOC solvents used in this area).
- Prep and Seal Booth rated at 35,788 cfm where a solvent mixture is used to wipe grease and dirt from cab and sleeper surfaces prior to entering the cab washer. VOC emissions are associated with this operation.

A revised equipment list was included in the application. No specific conditions were included in the final Order.

Notice of Construction 4895 (obsolete): On July 14, 1993, Order of Approval No. 4895 was issued to Kenworth for the addition of makeup air units and heater for providing heat to the plant. All permitted units are fueled on natural gas. The final Order limits facility-wide natural gas combustion to 421 million standard cubic feet per year and requires monthly records to be kept for natural gas usage.

Notice of Construction 5475 (obsolete): On May 23, 1994, Kenworth requested the current VOC emission cap of 85 tons per year be increased by an additional 99 tons per year to 184 tons per year. Increases were due to increased priming of truck chassis, additional component painting, new truck models which required more paint, additional base coat and clear coat finish, and increased usage of cleaning solvent and adhesives with larger surfaces. Kenworth was also proposing to increase production. Order of Approval 5475 was issued on November 1, 1994. The Order permitted an increase in VOC emissions from chassis priming by 5.01 tons per year (tpy), from new truck models and additional component painting by 32.09 tpy, from base coat/clear coat finish application by 59.35 tpy, and from further additions of cleaners, adhesives and sealants by 2.50 tpy, all for a total of 98.95 tons per year increase of VOC emissions for a new plant-wide VOC emissions total of 183.95 tons per year. This Order included the VOC content limits in the original facility-wide limit.

Notice of Construction 6074 (obsolete): This Order was originally issued on August 16, 1995. The original permit application requested consolidation of requirements in previously issued Orders of Approval as part of the operating permit process. It combined the Seattle and Renton plants and cancelled and superseded Orders of Approval 5475, 4212, 4895 and 4972. This permit specified the 184 tpy facility-wide VOC limit and provided an updated listing of equipment.

Notice of Construction 6074 Modification 1 (obsolete): Order of Approval No. 6074 Modification 1 was subsequently issued on August 8, 2003 to allow use of acetone and other negligibly reactive compounds as substitutes for Hazardous Air Pollutant (HAP)- and Volatile Organic

Compound (VOC)-classified solvents in topcoats, primers, gun wash thinner, and other products. This Order will become obsolete with issuance of Order 11587.

4.2 Regulatory Orders Issued to the Facility

The Orders include facility-wide emission limits, and the proposed Order 11587 includes a list of emission equipment that has been reviewed under Regulation I, Article 6.

Regulatory Order 6654 (obsolete): Kenworth requested an alternative means of compliance to meet the requirements of Regulation II, Section 3.04(e). This required application of VOC-containing material to any Group I or II vehicle or mobile equipment or their parts and components to be applied with high volume, low pressure (HVLP) application spray equipment, electrostatic application spray equipment or other high transfer efficiency application methods listed in the rule or approved by the Control Officer. PSCAA Board Resolution No. 848 (adopted April 10, 1997) approved General Regulatory Order No. 6654 as an Alternate Means of Compliance with PSCAA's VOC content limits for vehicles, as provided for in Regulation I, Section 3.23. Kenworth was allowed to use conventional spray equipment provided it does not exceed 3.5 pounds of VOC content per gallon of paint for topcoat and primer when using this equipment. This alternative means of compliance was carried forward into condition no. 2 of General Regulatory Order No. 8344 (adopted on July 24, 2003) which cancelled and superseded General Regulatory Order 6654. General Regulatory Order 8344 allowed Kenworth to not count negligibly reactive compounds as a VOC when computing pounds of VOC per gallon of coating.

Regulatory Order 6977 (obsolete): Kenworth requested an increase in facility-wide VOC emissions to meet customer demand for higher production levels. In addition, new models of trucks were being developed that were larger than current models, had more surface area, and required additional cleaning, priming and painting. A full top-down BACT analysis was submitted with the application. According to the engineering review, PSD permitting was not triggered. This Order was issued on October 21, 1997, and increased the facility-wide VOC emission limit to 383 tons per year. This Order was cancelled and superseded by Order of Approval 6074 Modification 1 dated August 8, 2003, to allow use of acetone and other negligibly reactive compounds as substitutes for Hazardous Air Pollutant (HAP)- and Volatile Organic Compound (VOC)-classified solvents in topcoats, primers, gun wash thinner, and other products

Regulatory Order 8344 (obsolete): Kenworth requested approval to substitute acetone-based thinner for HAP-based thinner for topcoats, primers, gun wash thinner and other products. A report was submitted showing coating reformulation with acetone which adequately demonstrated to the Agency that the use of negligibly reactive compounds was in conformance with the objectives stated in Regulation II, Section 1.02. Regulation II, Section 1.02 states that the agency policy is to control emissions of VOCs to the extent needed to attain and maintain compliance with the National Ambient Air Quality Standards for ozone, and to minimize emissions of stratospheric ozone depleting compounds and toxic organic compounds. Section 1.02 also states that the use of water-based, high solids, or powder coatings and water-based cleaning materials were preferred methodologies for compliance with Regulation II. Section 1.02 also specified the substitution of negligibly reactive compounds shall not be an acceptable means of compliance. Based on a review of Board Resolution No. 700, the main intent of this clause was to address the substitution with chlorofluorocarbons which could contribute to depletion of stratospheric ozone. EPA excludes acetone in the definition of VOC since it is a negligibly reactive compound, and does not contribute to depletion of the stratospheric ozone.

Therefore, it was resolved that acetone could be used as a substitute for HAP- and VOC-classified solvents in topcoats, primers, gun wash and thinner.

This Order was approved in Board Resolution No. 1006 on July 24, 2003. It was "bundled" with the Application for Notice of Construction No. 6074, as well as an additional General Regulatory Order, No. 8884. This Order, along with the use of conventional spray guns as an alternate means of compliance (Condition No. 2 of 8344) will become obsolete with issuance of Order 11587.

Regulatory Order 8884 (obsolete): Kenworth requested a voluntary limit on their facility-wide emissions of hazardous air pollutants (HAPs). New coating formulations, in which negligibly reactive non-HAP and non-VOC are substituted for hazardous air pollutants, made it possible for Kenworth to become a synthetic minor for hazardous air pollutants. This Order was approved on July 24, 2003. It was "bundled" with the Application for Notice of Construction No. 6074, as well as an additional General Regulatory Order, No. 8344. This Order will become obsolete with issuance of Order 11587.

Regulatory Order 11587: As part of the 2019 operating permit renewal process, it was determined that references to definitions in previous Orders needed to be updated to reflect the existing regulations. Order 11587 incorporates limits in Orders 6074, 8344, and 8884 (except for the use of conventional spray guns as an alternate means of compliance). No changes to emission limits were made, but the definitions of VOC and HAP were updated. The Order also includes an updated list of equipment that has been permitted to operate at this location through the Agency's Notice of Construction program.

4.3 Operating Permit Issuance and Renewal

4.3.1 Issuance of Original Permit

An air operating permit application was received by PSCAA from the Kenworth facility on June 7, 1995. On August 1, 1995, PSCAA issued written notification to Kenworth that the application met the completeness criteria contained in WAC 173-401-500(7).

PSCAA issued the Kenworth Air Operating Permit on August 24, 2000.

4.3.2 Minor Modification 1

On September 22, 2000, Kenworth submitted a Notice of Construction Application which requested approval to use acetone and other negligibly reactive compounds as substitutes for HAP- and VOC-classified solvents in topcoats, primers, gun wash thinner, and other products. The US EPA had determined that acetone was "negligibly reactive" and revised the definition of "volatile organic compound (VOC)" to exclude acetone.

On July 8, 2002, Kenworth also requested a change to the name of the responsible official, to Douglas J. Baugh, Plant Manager.

PSCAA reviewed these requests and took the following actions:

- PSCAA issued General Regulatory Order No. 8344 to allow use of acetone and other negligibly reactive compounds as substitutes for HAP- and VOC-classified solvents in topcoats, primers, gun wash thinner, and other products on July 24, 2003. General Regulatory Order No. 8344 superseded and cancelled General Regulatory Order No. 6654, dated April 10, 1997.

- PSCAA issued Notice of Construction Order of Approval No. 6074 Modification 1 to allow use of acetone and other negligibly reactive compounds as substitutes for Hazardous Air Pollutant (HAP)- and Volatile Organic Compound (VOC)-classified solvents in topcoats, primers, gun wash thinner, and other products on August 8, 2003. This modification superseded Orders of Approval No. 6074, dated August 16, 1995, and No. 6977 dated October 21, 1997.

These changes could not be done "off-permit" as existing requirements in the AOP (the original NOC Conditions) specifically required that acetone be counted as a VOC. PSCAA subsequently determined that the Kenworth AOP would have to undergo a Minor Permit Modification. Therefore, the permit was opened and a minor permit modification was issued.

4.4 Renewal 1

On August 24, 2004, Kenworth submitted a Title V renewal application for the facility. The application consisted of a cover letter and "marked up" copies of the existing AOP and SOB. Critical items required under WAC 173-401-710, such as a compliance plan and certification by the responsible official, were included. On September 2, 2004, PSCAA sent a letter to Kenworth indicating that the renewal application had been found to be complete. On March 20, 2006 Kenworth requested that the name of the responsible official be changed. This change was incorporated into the draft AOP renewal on March 27, 2006, rather than as an Administrative change to the current AOP. Renewal 1 was issued on February 22, 2007.

The Kenworth AOP was amended administratively as provided under WAC 173-401-720 to incorporate key personnel changes. Amended permits were issued on June 10, 2008, March 23, 2010, March 19, 2012, February 27, 2013, March 11, 2014, February 16, 2016, and March 26, 2018.

4.5 Renewal 2

On February 18, 2011, Kenworth submitted their second Title V renewal application. The application was found to be complete on February 24, 2011. During the course of Renewal 2 the permit was generally updated, and included the modified definitions of VOC and HAP as determined by Order of Approval 11587. The second renewed Title V permit was issued on January 16, 2019.

The Kenworth AOP was amended administratively as provided under WAC 173-401-720 to change the Responsible Official on March 11, 2020, and again on December 13, 2022.

4.6 Renewal 3

On May 19, 2023, Kenworth submitted their third Title V renewal application. The application was found to be complete on May 31, 2023. During the course of Renewal 3 the permit was generally updated to align with an updated Agency Title V permit template, as well as a modification of the Chemical Procurement Information Sheet System (CPIS) recordkeeping requirements. This and other changes are described throughout this Statement of Basis.

5 Compliance History

5.1 Compliance and Inspection history prior to issuance of the original AOP

The Kenworth facility has been inspected at least annually by PSCAA since 1993. Inspections in 2020 and 2021 were performed virtually due to the COVID-19 pandemic.

There have been odor complaints filed with PSCAA specifically naming Kenworth as the source of paint odors. None of these complaints have been verified by PSCAA; however, PSCAA has detected off-site paint odors when positioned downwind of Kenworth.

5.2 Compliance history since issuance of the previous AOP

PSCAA has taken the following enforcement actions against Kenworth since the second AOP renewal was issued on January 16, 2019:

Table 1. Written Warnings and Notices of Violation: January 2019 – February 2025

WW or NOV #[1]	Violation Date	Issue Date	Case closed?	Applicable Reg. or permit	Comment
3-A000278	1/1/2014	8/6/2021	Yes (CP 22-0084)	AOP No. 17796 Sec. 2.7	Failure to obtain an annual certification from 2013 - 2020 from the vendor that states for coatings that are activated via a plural component paint mix system prior to the spray gun
2-A000044	2/11/2022	3/4/2022	Yes	AOP No. 17796 Sec 2.11	Inspector observed an open container that was unattended in the Touch-Up Day Room.
3-A000721	1/20/2023	2/22/2023	No – Civil Penalty Served and Pending	AOP No. 17796 Sec 2.A.2.2, Reg I 9.16(c)(2), Reg I 9.20	The Interior Prep Cab Prime Booth was being operated with a filter gap on one of the downdraft filters.

Notes: [1] Written warnings are numbered with a 2- prefix; Notices of Violation have a 3- or a 4- prefix.

There are no outstanding compliance issues for this facility.

6 Potential to Emit and Actual Emission Inventory

Emissions at this facility come principally from coating operations and to a minor extent from assembly and maintenance operations. Emission levels depend upon the number of trucks the plant is producing at any given time. The table below shows emissions for the previous four years of emission reporting data from surface coating operations (VOCs and HAPs) and fuel combustion.

The emissions of common pollutants are listed below:

Table 2 Emission inventory summary of four years of emissions reporting data (tons)

Pollutant	2020	2021	2022	2023
Carbon monoxide (CO)	2	2	2	2
Nitrogen oxides (NOX)	2	3	3	3
Particulate matter (PM10)	0.2	0.2	0.2	0.2
Particulate matter (PM2.5)	0.2	0.2	0.2	0.2
Sulfur oxides (SO2)	0.01	0.02	0.02	0.02
Volatile organic compounds (Total VOC)	68	80	106	57
Total HAP	0.5	1	2	0.3

The potential to emit (PTE) for VOCs is 383 tons per 12-month period, which is a facility-wide enforceable limit under AOP requirement 1.21. This is above the PSD threshold of 250 tons/year.

The PTE for HAPs is 9.8 tons of any single HAP or 24.5 tons of total HAP combined during any consecutive 12-month period, which is a facility-wide enforceable limit under AOP requirement 1.22.

Potential to emit summaries were provided for each emissions unit as a part of the CAM applicability determination and are provided below:

AIR OPERATING PERMIT RENEWAL APPLICATION
Form C: Emissions

Emissions Unit Number (from Form B)	Pollutants (all regulated pollutants including greenhouse gases)	Emissions			CAM Applicability	
		Annual Potential Emissions (for each regulated air pollutant)	Have Potential Emissions changed since submittal of most recent AOP Application?	Actual Emissions for Calendar year 2021	annual Potential Emissions without regard to Control Device	CAM needed? If yes, submit a CAM plan
EU-1	VOC	<= 383	☐ Yes ☑ No	2.9	<= 383	
	HAP	<= 9.8/24.5	☐ Yes ☑ No	0.1	<= 9.8/24.5	☐ Yes ☑ No
	GHG	671	☐ Yes ☑ No	274	671	☐ Yes ☑ No
EU-2	VOC	<= 383	☐ Yes ☑ No	2.9	<= 383	☐ Yes ☑ No
	HAP	<= 9.8/24.5	☐ Yes ☑ No	0.1	<= 9.8/24.5	☐ Yes ☑ No
	GHG	360	☐ Yes ☑ No	147	360	☐ Yes ☑ No
EU-3	VOC	<= 383	☐ Yes ☑ No	2.9	<= 383	☐ Yes ☑ No
	HAP	<= 9.8/24.5	☐ Yes ☑ No	0.1	<= 9.8/24.5	☐ Yes ☑ No
	GHG	3484	☐ Yes ☑ No	1422	3484	☐ Yes ☑ No
EU-4	PM10	7.8	☐ Yes ☑ No	3.2	15.6	☐ Yes ☑ No
	VOC	<= 383	☐ Yes ☑ No	24.4	<= 383	☐ Yes ☑ No
	HAP	<= 9.8/24.5	☐ Yes ☑ No	0.2	<= 9.8/24.5	☐ Yes ☑ No
	GHG	439	☐ Yes ☑ No	179	439	☐ Yes ☑ No
EU-5	PM10	0.3	☐ Yes ☑ No	0.1	49.3	☐ Yes ☑ No
	VOC	<= 383	☐ Yes ☑ No	37.7	<= 383	☐ Yes ☑ No
	HAP	<= 9.8/24.5	☐ Yes ☑ No	0.3	<= 9.8/24.5	☐ Yes ☑ No
	GHG	948	☐ Yes ☑ No	387	948	☐ Yes ☑ No
EU-6	PM10	2.2	☐ Yes ☑ No	0.9	4.3	☐ Yes ☑ No
	VOC	<= 383	☐ Yes ☑ No	6.5	<= 383	☐ Yes ☑ No
	HAP	<= 9.8/24.5	☐ Yes ☑ No	0.1	<= 9.8/24.5	☐ Yes ☑ No
	GHG	319	☐ Yes ☑ No	130	319	☐ Yes ☑ No
EU-7	VOC	<= 383	☐ Yes ☑ No	2.9	<= 383	☐ Yes ☑ No
	HAP	<= 9.8/24.5	☐ Yes ☑ No	0.1	<= 9.8/24.5	☐ Yes ☑ No
	GHG	282	☐ Yes ☑ No	115	282	☐ Yes ☑ No
EU-8	CO	5.4	☐ Yes ☑ No	2.2	5.4	☐ Yes ☑ No
	NOX	6.6	☐ Yes ☑ No	2.7	6.6	☐ Yes ☑ No
	PM10	0.5	☐ Yes ☑ No	0.2	0.5	☐ Yes ☑ No
	VOC	0.3	☐ Yes ☑ No	0.1	0.3	☐ Yes ☑ No
	GHG	1622	☐ Yes ☑ No	662	1622	☐ Yes ☑ No
EU-9	NOX	0.3	☐ Yes ☑ No	0.1	0.3	☐ Yes ☑ No
	GHG	9.8	☐ Yes ☑ No	4	9.8	☐ Yes ☑ No
		PTE based on 2.45 multiplier or else cap limit.	☐ Yes ☐ No			☐ Yes ☐ No

Further detail for PM PTE from EU-4, EU-5, and EU-6 was provided in the following table:

POTENTIAL TO EMIT EMISSION UNITS WITH PM CONTROL UNCONTROLLED PM EMISSIONS				
MATERIAL	2021 POUNDS PURCHASE WITHOUT VOC	EMISSION FACTOR[2]	PTE MULTIPLIER[3]	PTE UNCONTROLLED PM EMISSIONS (tons/year)
EMISSION UNIT # 4				
CHASSIS BOOTH[6]				
Chassis Black	43568.75	0.1971	2.45	10.53
Activator	14522.92	0.1971	2.45	3.51
Chassis Color	6366.12	0.1971	2.45	1.54
			TOTAL EU-4	15.58
EMISSION UNIT #5				
CLEARCOAT BOOTH[1]				
Clearcoat	32711.93	0.3154	2.45	12.65
Activator	10903.98	0.3154	2.45	4.22
BASECOAT BOOTH[1]				
Topcoat	54135.30	0.3154	2.45	20.93
Activator	18045.10	0.3154	2.45	6.98
MANUAL BOOTH[4]				
Topcoat	9510.26	0.2760	2.45	3.22
Activator	3170.09	0.2760	2.45	1.07
PRIME BOOTH[4]				
Primer	544.68	0.2760	2.45	0.18
Activator	181.56	0.2760	2.45	0.06
			TOTAL EU-5	**49.31**
EMISSION UNIT #6				
TOUCHUP BOOTH[5]				
Topcoat	1828.90	0.2760	2.45	0.62
Activator	609.63	0.2760	2.45	0.21
Specialty Coating	4.68	0.2760	2.45	0.00
SPOVEN BOOTH[4]				
Topcoat	7681.36	0.2760	2.45	2.60
Activator	2560.45	0.2760	2.45	0.87
			TOAL EU-6	**4.29**

[1]Robotic electrostatic spray application
Transfer efficiency = 60% 0.6

[2]Emission factor = (1 - waste fraction) x (1 - transfer efficiency)
Year 2021 waste fraction = 21% 0.21

[3]PTE Multiplier =
MAX possible production/(Year 2021 mainline trucks produced/Year 2021 production days)
MAX possible production for current plant configuration = 44 mainline trucks/day
2021 production days =236
2021 trucks production =4235

[4]HVLP spray application
Transfer efficiency = 65% 0.65

[5] Brush, aerosol, or HVLP spray application
Transfer efficiency = 65% 0.65

[6] Electrostatic spray application
Transfer efficiency = 75% 0.75

NOTE: EU-2 (Materials Work),and EU-3 (Surface Prep) employ PM control however each has a PM PTE significantly less than the major coating operations of EUs 4, 5, and 6. Therefore the EUs with smaller PM PTEs were not included in this CAM applicability analysis because their emissions are insignificant in comparison to the larger emitting EUs

7 Compliance Assurance Monitoring, NESHAP and NSPS Applicability Review

7.1 Compliance Assurance Monitoring

The Compliance Assurance Monitoring (CAM) rule in 40 CFR Part 64 requires owners and operators to monitor the operation and maintenance of their control equipment so that they can evaluate the performance of their control devices and report whether or not their facilities meet established emission standards. If owners and operators of these facilities find that their control equipment is not working properly, the CAM rule requires them to take action to correct any malfunctions and to report such instances to the appropriate enforcement agency (i.e., State and local environmental agencies). Additionally, the CAM rule provides some enforcement tools that will help State and local environmental agencies require facilities to respond appropriately to the monitoring results and improve pollution control operations.

The CAM rule applies at major sources with emission units that have control devices, and emissions from the emission unit could exceed 100 tons per year if the control device was not operated. On May 19, 2023, Kenworth submitted an analysis to the Agency as part of their Title V permit renewal application. The only pollutant with a control device would be particulate matter emitted from the spray coating operations. Kenworth evaluated potential to emit for particulate matter from each emission unit and found that CAM was not applicable since emissions could not exceed 100 tons per year.

7.2 NESHAP Applicability

As part of the renewal process, the Agency reviewed federal National Emissions Standards for Hazardous Air Pollutants (NESHAPs) that might apply to this facility to determine applicability. A summary of the review is included below:

7.2.1 NESHAP: Stationary Reciprocating Internal Combustion Engines (40 CFR 63 Subpart ZZZZ)

The facility currently operates two diesel-fueled emergency generators. Both were installed prior to 1994 (existing engines). The generators are subject to the Reciprocating Internal Combustion Engines (RICE) NESHAP with applicable requirements listed in Section 2 of the operating permit. This includes the work practice standards identified in Table 2d of the NESHAP, the requirement to operate the generator in a manner consistent with safety and good air pollution control practices for minimizing emissions, and the requirement to operate the generator according to manufacturer's emission-related written instructions. Since these are emergency generators, there are also requirements to track hours of operation and limit hours of non-emergency operations. In accordance with 40 CFR 63.6645(a)(5), the initial notification and notification of compliance are not required for existing emergency RICE.

7.2.2 Inapplicable NESHAPs

Other NESHAPs reviewed for potential applicability and determined to be inapplicable are listed below and included in Section 8 of the operating permit. This is not an exhaustive list of all NESHAPs but ones that might apply to this facility based on current operations.

Regulation	Description	Basis for Inapplicability
40 CFR Part 60 Subpart MM	Performance standards for automobile and light duty truck surface coating operations.	No surface coating of automobiles or light duty trucks occurs at its facility and Kenworth would need to modify this permit to do so.
40 CFR Part 60: Subpart K Subpart Ka Subpart Kb Subpart Kc	Standards of Performance for VOC Storage Vessels	Do not apply since Kenworth does not have any storage tanks with a storage capacity of greater than 40 m^3 (10,568 gal) and will need approval to install any such vessels.
40 CFR Part 63 Subpart MMMM	Miscellaneous Metal Parts and Products Surface Coating NESHAP.	Kenworth is subject to a federally enforceable order, PSCAA General Regulatory Order No. 11587 dated 1/16/19 that limits its emissions of hazardous air pollutants (HAPs). The order limits HAP emissions to less than major source thresholds.
40 CFR Part 63 Subpart PPPP	Plastic Parts Surface Coating NESHAP.	Kenworth is subject to a federally enforceable order, PSCAA General Regulatory Order No. 11587 dated 1/16/19 that limits its emissions of hazardous air pollutants (HAPs). The order limits HAP emissions to less than major source thresholds.
40 CFR Part 63 Subpart DDDDD	Industrial, Commercial, and Institutional Boilers and Process Heaters NESHAP.	Kenworth is subject to a federally enforceable order, PSCAA General Regulatory Order No. 11587 dated 1/16/19 that limits its emissions of hazardous air pollutants (HAPs). The order limits HAP emissions to less than major source thresholds.
40 CFR Part 63 Subpart IIII	Auto and Light Duty Trucks Surface Coating NESHAP	No surface coating of automobiles or light duty trucks occurs at its facility and Kenworth would need to modify this permit to do so. Kenworth is subject to a federally enforceable order, PSCAA General Regulatory Order No. 11587 dated 1/16/19 that limits its emissions of hazardous air pollutants (HAPs). The order limits HAP emissions to less than major source thresholds.
40 CFR Part 63 Subpart CCCCCC	Gasoline Dispensing Facilities (Area Source) NESHAP	Kenworth does not dispense gasoline
40 CFR Part 63 Subpart XXXXXX	Metal Fabrication and Finishing (Area Source) NESHAP	Per the 63.11522 definition of "*primarily engaged*" (e.g. "where this production represents at least 50% of the production at a facility") and according to 63.11514, Kenworth is not subject to this subpart because Kenworth is not *primarily engaged* in any of the applicable source categories. The applicable source categories are: the operation of metal fabrication and finishing of Electrical and Electronic Equipment; Metal Products; Plate Work (Boilers); Structural Metal Manufacturing; Heating Equipment; Industrial Machinery and Equipment; Iron and Steel Forging; Primary Metal Products; and Valves & Pipe Fittings.

Regulation	Description	Basis for Inapplicability
40 CFR Part 63 Subpart HHHHHH	Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources NESHAP	Kenworth is not involved in the activities listed in 63.11169 and does not perform the activities listed in 63.11170. • Kenworth does not perform paint stripping operations that involve the use of chemical strippers that contain MeCl. • Kenworth does not perform autobody refinishing operations. Kenworth is an Original Equipment Manufacturer and a vehicle assembly plant. Per the 63.11180 definition of "*Motor vehicle and mobile equipment surface coating*," spray coating operations at Kenworth are not included in the Subpart because Kenworth is a vehicle assembly plant. Kenworth does not spray apply coatings containing the target HAPs to parts that are not motor vehicles or mobile equipment.

7.3 NSPS

As part of the renewal process, the Agency reviewed federal New Source Performance Standards (NSPS) that might apply to this facility to determine applicability. A summary of the review is included below:

7.3.1 Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (40 CFR Part 60, Subpart IIII)

The provisions of the NSPS apply to owners or operators of stationary compression ignition (CI) internal combustion engines (ICE) that commence construction after July 11, 2005, where the stationary CI ICE are manufactured after April 1, 2006. The permittee does not operate any engines that meet these criteria. If new engines are installed, they would be required to meet the requirements in the NSPS so it is not listed as an inapplicable requirement.

8 Explanation of Applicable Requirements Tables and Compliance Methods

Applicable requirements are listed in several sections of this operating permit as outlined below. The permit only lists the requirements that PSCAA has determined to be within the scope of the definition of "applicable requirements" under the operating permit program. Kenworth is legally responsible for complying with all applicable requirements of the operating permit as well as other requirements that do not fit the definition of "applicable requirements" found in Chapter 173-401 Washington Administrative Code (WAC). Some of the applicable requirements contain terms or monitoring, maintenance and recordkeeping conditions that require detailed explanation in this statement of basis. The specific requirements are listed below, along with any necessary explanations in monitoring, maintenance, and recordkeeping conditions.

Applicable requirements that are not ongoing are not included in the permit because they are not in effect during the term of the permit (a.k.a. "obsolete"). However, these requirements are addressed here in the statement of basis.

8.1 Requirement Tables

Sections 1 and 2 of the permit have applicable requirements set up in tables. Section 1 contains the requirements that apply facility-wide to all the emission units regulated by this permit. These requirements also apply to emission units identified in Section 2 of the permit. If the compliance method for any requirement in Section 1 is more extensive for a specific emission unit, that requirement is repeated in Section 2 of the permit with the additional monitoring, maintenance and recordkeeping requirements.

The tables list the citation for the "enforceable requirement" and the adoption or effective dates in Table 14 and Table 15 of the AOP. In some cases, the effective dates of the "Federally Enforceable" requirement and the "*State Only*" requirement are different because either the state (or local authority) has not submitted the regulation to the Environmental Protection Agency (EPA) for approval into the State Implementation Plan (SIP), or the state (or local authority) has submitted it and the EPA has not yet approved it. "*State Only*" adoption dates are in italicized font, and shall be understood to include Ecology and PSCAA. When the EPA does approve the new requirement into the SIP, the old requirement will be automatically replaced and superseded by the new requirement. The new requirement will be enforceable by the EPA as well as PSCAA from the date that it is adopted into the SIP, and the old requirement will no longer be an applicable requirement. Federal enforceability is described in the third column of Table 14 and Table 15 of the AOP. Some requirements in WAC 173-400-040 may be deleted from PSCAA SIP if it is determined there is a corresponding rule being implemented by PSCAA that applies only to sources in our jurisdiction. In these cases, only the local rule will apply if EPA removes the requirement from the SIP. This is consistent with the language in the 12/29/12 version of WAC 173-400-020(1). "The provisions of this chapter shall apply statewide, except for specific subsections where a local authority has adopted and implemented corresponding local rules that apply only to sources subject to local jurisdiction as provided under RCW 70.94.141 and 70.94.331."

The requirement tables in Sections 1 and 2 also contain a brief description of the enforceable requirement. This description is not an enforceable condition. In the event of conflict or omission between the information contained in the brief description and the actual statute or regulation cited, the requirements and language of the actual statute or regulation cited shall govern. For more information regarding any of the requirements cited in the second column, refer to the actual requirements cited.

The "Compliance Method" listed in the tables refers to permit conditions below the tables that include monitoring, recordkeeping and reporting obligations the permittee must conduct to comply with the permit. Following the monitoring method is an enforceable requirement of this permit.

The "Reference Test Method" listed in the requirements table is the test method to be used when a source test is required to determine compliance. In some cases where the enforceable requirement does not cite a test method, one has been added. If a reference test method is not listed with the requirement, this means a test method is not applicable to the requirement. Reference Test Methods included in the permit are listed in Section 7 of the permit and include the applicable averaging period.

9 Applicable Requirements and Changes in the Renewal

This AOP renewal has been updated to reflect some updated regulatory language and requests from the applicant. Sections with substantive change include:

9.1 Emission Unit Summary Table

A new table was added to the permit located before Section 1 that gives a general description of the emission units at the facility. This is similar to a table which was formerly located in Section 2.

9.2 Facility-Wide Surface Coating Operations Moved to Section 1

Requirements concerning Facility-Wide Surface Coating Operations have been moved to Section 1 of the AOP. These requirements were previously found in Section 2. This change was made because Section 1 is specific to facility-wide requirements. Section 2 is specific to each individual Emission Unit. Because Facility-Wide Surface Coating Operations are not a specific Emission Unit, but a facility-wide requirement, Section 1 was determined to be more appropriate.

9.3 Complaint Response

Section 1.16 – Complaint Response, now requires the facility to develop a complaint response plan instead of only recording and investigating complaints.

9.4 Chemical Procurement Information System

Section 1.38 – Chemical Procurement Information System language was changed based on a request from the applicant. The change allows the annual certification from the vendor to be in the form of a spreadsheet of formulations, or similar, instead of a letter from the vendor. The Agency determined this is reasonable because the information provided by the manufacturer sufficiently shows the chemical composition of the material in question.

9.5 Update to Description of Emission Unit 9

The description of Emission Unit 9 was updated to eliminate reference to alternative fuels. This is because 40 CFR 63 ZZZZ already defines diesel fuel as “any liquid obtained from the distillation of petroleum with a boiling point of approximately 150 to 360 degrees Celsius. One commonly used form is fuel oil number 2. Diesel fuel also includes any non-distillate fuel with comparable physical and chemical properties (e.g. biodiesel) that is suitable for use in compression ignition engines.” Any reference to alternative fuels beyond this definition was determined to be unnecessary.

9.6 Updates to 40 CFR 63 ZZZZ

Minor rule language was updated in 40 CFR 63 Subpart ZZZZ on 8/30/2024. This language is reflected in Table 13. The previous description of the emission unit referenced that alternative fuels may be used. This sentence was removed because the 40 CFR 63 ZZZZ definition of diesel is inclusive of alternatives.

A more thorough description of ZZZZ applicability was written into Table 13, as well as the new paragraph 2.53 which details applicability of 40 CFR 63 Subpart A – NESHAP General Provisions. The full language of 40 CFR 63 Subpart A has been included as an attachment.

9.7 Removal of Site Contact on Permit Cover Page

The Agency historically has included the current site contact information on the front page of the permit. However, over time it has become apparent that the site contact can change frequently. Per the Washington AOP rules, this change of the site contact requires a permit amendment. However, the AOP rules do not require this information to be in the permit itself. To streamline our system the Agency has removed the site contact from the AOP and instead keeps that information in our files and in our database. This will eliminate extraneous permit amendments while still maintaining the site contact information in an easily accessible and secure location. The responsible official's name and contact information remains in the AOP.

9.8 Removal of "Emergency" Affirmative Defense Provisions in Title V and WAC 173-401-645

The affirmative defense provisions provided for in Title V of the Clean Air Act were deleted from the implementing federal rules in section 70.6(g) as of August 21, 2023. Although the WAC language has not yet been removed from the state regulation and EPA's approval of our program still contains this provision, the Federal Register Notice recommended that the emergency affirmative defense not be included in Title V permits issued after the effective date of the Federal Register Notice.

The Federal Register Notice can be found here:
https://www.epa.gov/system/files/documents/2023-07/8961-01-OAR%20Title%20V%20Affirmative%20Defense%20Final%20Rule.pdf

The language that was included in previous Air Operating Permits issued by PSCAA is below:

"Emergency

An emergency, as defined in WAC 173-401-645(1), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the conditions below are met.

a. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

i. An emergency occurred and that the permittee can identify the cause(s) of the emergency;

ii. The permitted facility was at the time being properly operated;

iii. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

iv. The permittee submitted notice of the emergency to the Puget Sound Clean Air Agency within two working days of the time when emission limitations were exceeded due to the emergency or shorter periods of time specified in an applicable requirement. This notice fulfills the requirement of WAC 173-401-615(3)(b) unless the excess emissions represent a potential threat to human health or safety. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

b. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

c. This condition is in addition to any emergency or upset provision contained in any applicable requirement.

[WAC 173-401-645]"

9.9 PSCAA State Implementation Plan (SIP) Changes

The PSCAA State Implementation Plan (SIP) was updated since the last permit for this facility was issued. This update resulted in replacing multiple state WAC rules with PSCAA rules and ensuring all state-only enforceable requirements were identified. A table was added to Section 5.32 of the permit entitled identifying which rules are state-only enforceable and which are also federally enforceable.

9.10 Change to Semiannual Reporting Date

The Agency is making an effort to have all AOP semiannual reports due July 30 and January 30. This is reflected in these updated dates in Section 5.4.

9.11 Format Changes

The format and organization of the AOP has been updated from the previous version.

The Agency's current format and organization includes:

Section 1: Facility-wide Applicable Requirements

Section 2: Emission Unit Specific Applicable Requirements

Section 3: Standard Terms and Conditions

Section 4: General Permitting Requirements

Section 5: General Compliance Requirements

Section 6: General Applicable Requirements

Section 7: Test Methods and Averaging Periods

Section 8: Inapplicable Requirements

Section 9: Insignificant Emission Units and Activities

10 Compliance Methods

Compliance methods include monitoring, recordkeeping and reporting obligations specific to the requirement that will be used by the permittee in determining if they are in continuous or intermittent compliance. In some cases where the applicable requirement has little or no ongoing monitoring requirements, monitoring has been added. This is called "gapfilling" and is authorized under WAC 173-401-615(1)(b).

Whenever PSCAA uses a "gap-filling" monitoring method, we determine the monitoring frequency using criteria contained in EPA's April 30, 1999 Draft *Periodic Monitoring Technical Reference Document*. We consider "the five criteria" in determining how often the facility should

perform a monitoring activity: hourly, once per shift, daily, weekly, monthly, quarterly, annually, or once per five-year permitting period. The five criteria are:

The five criteria are:

(1) Initial compliance. One source may have never violated a requirement, but it still applies. The next source, however, may really have to work to stay in compliance with the requirement. Walk-around inspections for fugitive emissions should be done more frequently at a steel mill than a truck assembly facility, for example.

(2) Margin of compliance. The monitoring method and frequency are designed so that the source will identify potential problems early and take corrective action before a violation occurs. The generic opacity limit on a fabric filter control device might be 20%, but a properly maintained baghouse should not have any visible emissions at all.

(3) Variability of process and emissions. A highly variable process may need more frequent watching than one that runs only intermittently, or one that runs continuously at an “easy” rate.

(4) Environmental impacts of problems. More frequent inspections would be required for a process for which a maintenance problem is likely to result in emissions that would have a significant environmental impact.

(5) Other technical considerations. The facility is required to periodically inspect and perform routine maintenance on all equipment in accordance with an acceptable operation and maintenance (O&M) Plan. What technical aspects of the equipment under consideration would influence inspection frequency above and beyond O&M Plan requirements? Usually it is sufficient to operate and maintain (and monitor) equipment in accordance with manufacturer’s instructions.

11 Obsolete Requirements

A standard PSCAA Notice of Construction Approval condition, NOC Condition No. 1, requires that the equipment, device or process be installed according to plans and specifications submitted to PSCAA. Once the equipment is installed, PSCAA requires certification by the applicant that the installation was as approved; this is usually done with a Notice of Completion. Normally within six months to a year after receiving a Notice of Completion, a PSCAA inspector verifies by inspection that the equipment was installed as specified and in accordance with the Approval Order. While the Notice of Completion is a one-time requirement that Kenworth Renton has complied with, Kenworth Renton cannot change the approved equipment in such a manner that requires an NOC without first obtaining an NOC approval. In most cases, once Kenworth Renton has filed the Notice of Completion and a PSCAA inspector has verified that the equipment was installed according to the Approval Order, PSCAA considers NOC Condition No. 1 an obsolete condition. However, in some cases in the permit PSCAA has identified a need to specify that the equipment cannot be altered in such a manner that requires an NOC Approval.

The following Orders of Approval are also obsolete:

Order No.	Approval Date	Project Description	Why obsolete
4212	3/2/1992	One 20 truck/day painting and assembly plant with four process areas (cab painting, chassis painting, touch-up painting, and small parts painting), a pyrolytic oven, a still, storage tanks, and fuel tank welding operations (See attached).	Cancelled and superseded by Order 6074 issued 8/16/95
4895	7/14/1993	Thirteen Makeup Air Units of 2.28, 1.647, 1.81, 1.81, 1.84, 1.615, 1.453, 1.453, 1.211, 1.211, 1.733, 1.255 and 1.255 MMBtu/hr heat input rating, respectively. One Cab Prime Air Supply House (ASH) of 5.9 MMBtu/hr, Touch-up #1 ASH of 9.2 MMBtu/hr, Touch-up #2 ASH of 7.9 MMBtu/hr, Basecoat Paint ASH of 18.2 MMBtu/hr, and a Prep/Clean ASH of 10.2 MMBtu/hr. One Cab Washer at 6.6 MMBtu/hr, a Small Parts Washer at 3.0 MMBtu/hr, a Small Parts Drying Oven at 1.5 MMBtu/hr, one Cab Manual ASH of 6.8 MMBtu/hr, and one Chassis Paint ASH of 11.6 MMBtu/hr.	Cancelled and superseded by Order 6074 issued 8/16/95
4972	6/29/1993	Two Prep Booths at 32,000 cfm and 33,400 cfm with dry filters to capture sanding dust, and one Prep & Seal Wash Booth at 35,788 cfm with a vertical exhaust stack.	Cancelled and superseded by Order 6074 issued 8/16/95
5475	11/1/1994	Modification of former Notices of Construction to increase VOC emissions from Chassis Priming by 5.01 TPY, from New Truck Models and Additional Component Painting by 32.09 TPY, from Base Coat/Clear Coat Finish application by 59.35 TPY, and from further additions of cleaners, adhesives and sealants by 2.50 TPY, all for a total of 98.95 tons per year increase of VOC emissions for a new plant-wide VOC emissions total of 183.95 tons per year.	Cancelled and superseded by Order 6074 issued 8/16/95
6074	8/16/95	Consolidation of former Orders of Approval to summarize restrictions and conditions associated with the operation of a Truck Manufacturing facility.	Cancelled and superseded by Order 6074 issued 8/8/03
6654	4/10/97	Regulatory Order For Alternate Means Of Compliance With PSAPCA Regulation II Section 3.04(e).	Cancelled and superseded by Order 8344 issued 7/24/03
6977	10/21/1997	Increase VOC Emissions Cap from 184 tons per year to 383 tons per year. [Superseded - See NOC 6074, 8/8/03]	Cancelled and superseded by Order 6074 issued 8/8/03
8344	7/24/2003	Use of acetone and other negligibly reactive compounds as substitutes for Hazardous Air Pollutant (HAP) and Volatile Organic Compound (VOC) classified solvents in topcoats, primers, gun wash thinner, and other products.	Cancelled and superseded by Order 11587
8884	7/24/2003	Synthetic Minor to limit facility-wide emissions of total HAP, and any single HAP.	Cancelled and superseded by Order 11587
6074	8/8/2003	Use of Acetone and other negligibly reactive compounds as substitutes for Hazardous Air Pollutant (HAP)- and Volatile Organic Compound (VOC)-classified solvents in topcoats, primers, gun wash thinner and other products.	Cancelled and superseded by Order 11587

12 Inapplicable Requirements

The requirements identified in Section 8 of the air operating permit do not apply to the facility, or to the specific emissions units identified in the permit. The permit shield applies to all requirements so identified.

During the previous renewal, Kenworth requested that additional requirements be listed as inapplicable that were not included in the final permit for the following reasons. This request has been carried over into this renewal:

Regulation	Description	Reason for not including as Inapplicable Requirement
RCW 70.94.531 (State Only Requirement)	Transportation demand management plan requirement	This is not considered within the scope of the permit.
WAC 173-400-040(3)(b)	If emission unit identified to be a significant contributor to nonattainment status of area, reasonable and available control methods must be used. This rule does not apply because no emission units at Kenworth have been designated a significant contributor of pollutant to a nonattainment area.	Not included since area is not in nonattainment.
WAC 173-400-040(8)(b)	If emission unit identified to be a significant contributor to nonattainment status of area, reasonable and available control methods must be used. This rule does not apply because no emission units at Kenworth have been designated a significant contributor to a PM-10 nonattainment area.	Not included since area is not in nonattainment.
WAC 173-470	Ambient Air Quality Standards (AAQS) for PM. WAC 173-470, 474, 475, 480 and 481 do not apply because Ambient Air Quality Standards do not apply to stationary sources.	AAQS broadly apply to the area. The Agency no longer identifies these as inapplicable requirements in these permits.
WAC 173-474	Ambient Air Quality Standards (AAQS) for SO_2. WAC 173-470, 474, 475, 480 and 481 do not apply because Ambient Air Quality Standards do not apply to stationary sources.	AAQS broadly apply to the area. The Agency no longer identifies these as inapplicable requirements in these permits.

Regulation	Description	Reason for not including as Inapplicable Requirement
WAC 173-475	Ambient Air Quality Standards (AAQS) for CO, Ozone, and NOx. WAC 173-470, 474, 475, 480 and 481 do not apply because Ambient Air Quality Standards do not apply to stationary sources.	AAQS broadly apply to the area. The Agency no longer identifies these as inapplicable requirements in these permits.
WAC 173-480	Ambient Air Quality Standards (AAQS) and emission limits for radionuclides. WAC 173-470, 474, 475, 480 and 481 do not apply because Ambient Air Quality Standards do not apply to stationary sources.	AAQS broadly apply to the area. The Agency no longer identifies these as inapplicable requirements in these permits.
WAC 173-481	Ambient Air Quality Standards (AAQS) and emission standards for fluorides. WAC 173-470, 474, 475, 480 and 481 do not apply because Ambient Air Quality Standards do not apply to stationary sources.	AAQS broadly apply to the area. The Agency no longer identifies these as inapplicable requirements in these permits.

13 Insignificant Emission Units and Activities

Section 9 of the permit addresses insignificant emission units and activities. In accordance with WAC 173-401-530(1), determination of an emission unit or activity as insignificant does not exempt the unit or activity from any applicable requirement.

An emission unit or activity is insignificant based on one or more of the criteria identified in WAC 173-401-530. This includes categorical exemption, exemption based on emissions being below emission thresholds in WAC 173-401-530(4), or exemption based on size or production rate. Activities that generate only fugitive emissions which are subject to no applicable requirement other than generally applicable requirements can also be classified as insignificant. Categorically exemption units or activities do not need to be listed in the permit application, but all others do.

Kenworth identified several items of equipment that qualify as insignificant due to capacity below the specified levels in WAC 173-401-533. These items of equipment are listed as insignificant emission units in Section 9 of the permit. Monitoring requirements for insignificant emission units are detailed in Condition 1.19 of the permit. In essence, Kenworth will be required to use good industrial practices to maintain insignificant emission units, and to promptly repair defective equipment or shut down the unit until defective equipment can be repaired. Kenworth won't have to keep records of maintenance of insignificant emission units except when such equipment is inspected and a problem requiring prompt repair is discovered during a quarterly plant-wide inspection.

14 Public Comments and Responses during renewal process

In accordance with WAC 173-401-800, the Agency provided public notice for issuance of a draft permit renewal. The draft permit renewal went out for public comment on July 10, 2025 with a

request to submit any comments by August 11, 2025. Public notice included publication in Ecology's Permit Register, the Daily Journal of Commerce, and the Renton Reporter. The Agency also provided notice to affected states in accordance with WAC 173-401-820.

No comments were received during the public comment period.

15 EPA Comment Period

In accordance with WAC 173-401-810, the Agency provided a copy of the proposed permit to EPA Region 10 on August 13, 2025.

EPA submitted no comments and did not object to permit issuance.