Kenworth Truck Company
P.O. Box 9001
1601 North 8th Street
Renton, Washington 98057
(425) 227-5800

May 19th, 2023

Puget Sound Clean Air Agency

Attn: Operating Permit Certification

1904 3rd Ave, Suite 105

Seattle, WA 98101

SUBJECT: Kenworth Truck Company – Renton, Submittal of Air Operating Permit (No.17796) Renewal Application

Please find attached, the Renewal Air Operating Permit application for the Kenworth Truck Company, located in Renton, Washington. If you have any questions please contact Mr. Chris Bui, Environmental Engineer, at 425-227-5049.

Sincerely,

Scott Smith
Plant Manager

Cc: EPA Region 10, Mail Stop OAQ-107

Attn: Air Operating Permit

1200 Sixth Ave

Seattle, WA 98101

Email to Maggie Corbin: MaggieC@pscleanair.gov

Form A: General Information

FACILITY INFORMATION

Company Name	Site Name		
Kenworth Truck Company	Kenworth Truck Company Renton		
Site Address	**City**	**State**	**Zip**
1601 North 8th Street	Renton	WA	98057
Title V Air Operating Permit No.	**Expiration Date of Title V Operating Permit**		
17796	January 16, 2024		
SIC Code	**NAICS Code**		
3711	33612		

RESPONSIBLE OFFICIAL

Name	Title		
Scott Smith	Plant Manager		
Phone	**Email**		
425-227-5801	Scott.Smith@PACCAR.com		
Address (if different from site address)	**City**	**State**	**Zip**

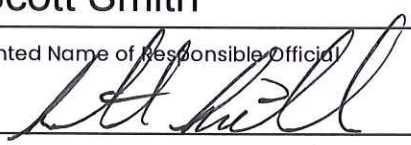
FACILITY CONTACT INFORMATION

Name	Title		
Chris Bui	Environmental Engineer		
Phone	**Email**		
425-227-5049	Chris.Bui@PACCAR.com		
Address (if different from site address)	**City**	**State**	**Zip**

STATEMENT OF CERTIFICATION

Responsible Official Statement:

I, the undersigned, certify that I am the responsible official, as defined in WAC 173-401-200, of the Title V source addressed in this application. I further certify, based on information and belief formed after reasonable inquiry, that the statements and information in this application are true, accurate and complete.

Scott Smith	Plant Manager
Printed Name of Responsible Official	Title of Responsible Official
	5/19/2023
Signature	Date

KENWORTH
A PACCAR COMPANY

Kenworth Truck Company
P.O. Box 9001
1601 North 8th Street
Renton, Washington 98057
(425) 227-5800

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS

Based on the information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Signature of Responsible Official

5/19/2023
Date

_Scott Smith _____
Printed Name

_Plant Manager_____
Title

Kenworth Truck Company
P.O. Box 9001
1601 North 8th Street
Renton, Washington 98057
(425) 227-5800

CERTIFICATION OF COMPLIANCE/ COMPLIANCE PLAN

Based on the monitoring methods included in Kenworth's current and proposed Title V Air Operating Permit (AOP) No. 17796, I certify that the facility is in compliance with all applicable requirements and that the facility will continue to comply with such requirements.

For applicable requirements that will become effective during the permit term, the facility will meet such requirements on a timely basis.

Signature of Responsible Official

5/19/2023
Date

_Scott Smith _____
Printed Name

_Plant Manager_____
Title

AIR OPERATING PERMIT RENEWAL APPLICATION
Form B: Emissions Units

Emissions Unit Number	Emissions Unit Name	Emissions Unit Description	Air Pollution Control Equipment	Fuels (used)	Significant or Insignificant WAC 173-401-530 through-533		
					(S or I)		Basis
EU-1	Assembly Operations; Highway and Off-Highway Trucks	This emission unit consists of activities associated with assembling the trucks and some of their components. Assembly operations currently take place inside Buildings 1 and 6. The assembly operations may include the use of materials such as lubricants, glues, adhesives, greases, sealants, and solvents - both hand and spray applied with aerosol cans. Ventilation hoods with no air pollution controls may be included in these areas for worker safety and comfort but these are insignificant emission units.	None	None	☑ S	☐ I	NA
EU-2	Materials Work	This emission unit consists of activities associated with truck component fabrication in Building 1. Motor vehicle and mobile equipment coating operations, including spray coating, are not included under this emission unit. Materials used to aid fabrication may include lubricants, coolants, greases, adhesives, and cleaners. This emission unit includes welding equipment and welding dust collectors that recirculate filtered air back into the factory. There is also one welding fume collector located in the Off-Highway area and one in the Maintenance area that are vented to the outside. Parts cleaners using a low VOC product operate within this emission unit and are considered insignificant emissions units.	Dry Filters	None	☑ S	☐ I	NA
EU-3	Surface Prep: Truck Components	This emission unit consists of activities associated with preparing truck components for coating operations. Motor vehicle and mobile equipment coating operations, including spray coating, are not included under this emission unit. Activities currently are located in Building 1. Activities in surface preparation include assembly, joining, filling, grinding, sanding, and washing and sealing. The Cab Washer and Cab Washer Dry-off oven are insignificant emission units. This emission unit includes: • Two Prep Booths and a Vacuum System with Dust Collection; • Chassis Dry Filter Prep Booth and Prep Seal and Wash Booth (dry filter on prep seal part of booth); • Bump and Grind Prep Booth (Dry Filter); • Sand and Repair Prep Booth (Dry Filter); and • Cab Prime Sand/Prep Booth (Dry Filter) .	Dry Filters	None	☑ S	☐ I	NA
EU-4	Coating Operations: Truck components & Chassis	This emission unit includes cleaning and surface coating activities of truck components. Currently, it is located in Building 1 and includes cleaning and surface coating of truck chassis. This emission unit includes: • One Truck Chassis Dry Filter Paint Booth with Paint Drying Oven .	Dry Filters	None	☑ S	☐ I	NA
EU-5	Coating Operations: Truck Components	This emission unit includes cleaning and surface coating activities of truck components. Currently, it is located in Building 1 and includes cleaning and surface coating of truck components such as doors, fenders, hoods, wheels, bumpers, cabs, sleepers and integrated units. The emission unit includes: • Three water wash paint booths, • One dry filter paint booth, • Two paint drying ovens; and • One paint flash tunnel.	Water Wash, Dry Filters	None	☑ S	☐ I	NA
EU-6	Coating Operations: Highway & Off-Highway Trucks And Touch-UP	This emission unit includes cleaning and surface coating activities of highway and off-highway completed trucks and truck components. Currently, it is located in Building 1 and covers painting and touch-up which includes activities such as stripping, filling, surface preparation, cleaning and surface coating of trucks, and touching up of completed highway and off-highway trucks. The emission unit includes two dry filter paint booths, one of which can also function as a drying oven.	Dry Filters	None	☑ S	☐ I	NA

EU-7	Coating Mix/Solvent System	This emission unit includes the storage, thinning, tinting, and packaging of coating materials for application on truck components, completed trucks and other maintenance coating needs, as well as the solvent and activator storage and distribution systems. The paint mix room is located in Building 1 and includes ventilation with no pollution control equipment. Solvent is delivered by piping system from the storage tank in Building 2 to the paint mix room in Building 1, then distributed to each of the coating operations emission units. At each solvent delivery station, used solvent is collected and piped to the waste solvent tank located in Building 2. In Building 2, in the waste processing area, clean solvent is reclaimed from the waste stream and reused. Paint components and activator are received in various size containers up to bulk storage totes and are transferred to use containers and storage tanks of variable size, then distributed to each of the coating operations emission units.	None	None	☑ S	☐ I	NA
EU-8	Gas Fueled Equipment	This emission unit includes all air, water and other medium heaters that are fueled by natural gas and are larger than applicable size thresholds making them significant sources. This includes makeup air unit (MAUs) and air supply houses (ASHs) larger than 5 MMBtu/hr. Currently, natural gas is the primary fuel; however, other petroleum-based fuels may be used including propane, butane, and liquid natural gas.	None	Natural Gas Propane Butane LNG	☑ S	☐ I	NA
EU-9	emergency Engines	This emission unit includes equipment that is necessary for emergency situations and includes an existing 380 HP emergency electrical generator and an existing 235 HP fire pump. Both engines installed prior to 1994. Currently, diesel is the primary fuel; however, other alternative fuels may be used.	None	Diesel or other alternative fuels	☑ S	☐ I	NA
					☐ S	☑ I	See Tables 17 & 18, attached

Documentation

9.5 Upon request from PSCAA the permittee must provide sufficient documentation to enable PSCAA to determine that the emission unit or activity has been appropriately listed as insignificant.

[WAC 173-401-530(5)(a)]

9.6 Upon request from PSCAA, at any time during the term of the permit, if the permittee lists an activity or emissions unit as insignificant under Condition No. 9.1(a) of this section then upon request from PSCAA the permittee shall demonstrate to PSCAA that the actual emissions of the unit or activity are below the emission thresholds listed in WAC 173-401-530(4).

[WAC 173-401-530(5)(b)]

Permit Revision

9.7 An activity or emissions unit that qualifies as insignificant solely on the basis of Condition No. 9.1(a) of this section shall not exceed the emissions thresholds specified in WAC 173-401-530(4), until the permit is modified pursuant to WAC 173-401-725.

[WAC 173-401-530(6)]

Table 17. Insignificant Emission Units Based on Maximum Rated Capacity

The following units and activities are listed as insignificant based on maximum rated capacity per WAC 173-401-533.	
Description	**WAC 173-401-533(2)**
Make-Up Air Units (MAU): natural gas fired and less than five million Btu/hr.	WAC 173-401-533(2)(e)
Air Supply Houses (ASH): natural gas fired and less than five million Btu/hr.	WAC 173-401-533(2)(e)
Cab Washer Burners: natural gas fired and less than five million Btu/hr.	WAC 173-401-533(2)(r)
Hot Water Heaters: 2 @ 85 gallons each. Natural gas fired, each at less than five million Btu/hr.	WAC 173-401-533(2)(r)
Portable Pressure Washer: propane fired and less than five million Btu/hr.	WAC 173-401-533(2)(r)
Pressure Washers: 2 (paint booth & cleaning pit), natural gas fired. Each at less than five million Btu/hr.	WAC 173-401-533(2)(r)
Welding equipment: Less than 1 ton per day of welding rod is used.	WAC 173-401-533(2)(i)
Two Diesel Fuel Aboveground Storage Tanks, 1 @ 5,000 gallons and 1 @ 7,500 gallons: Tank capacity is less than ten thousand gallons and stores a VOC with a vapor pressure less than 80mm Hg at 21C.	WAC 173-401-533(2)(c)
Fire Pump Diesel Tank, 320 gallons: Tank capacity is less than ten thousand gallons and stores a VOC with a vapor pressure less than 80mm Hg @ 21C.	WAC 173-401-533(2)(c)
Emergency Generator Diesel Fuel Tank, 210 gallons: Tank capacity is less than 260 gallons.	WAC 173-401-533(2)(a)
Propane Tank, 1,000 gallons.	WAC 173-401-533(2)(d)
Antifreeze Aboveground Storage Tank, 5,000 gallons: Tank capacity is less than ten thousand gallons and stores a VOC with a vapor pressure less than	WAC 173-401-533(2)(c)

The following units and activities are listed as insignificant based on maximum rated capacity per WAC 173-401-533.	
Description	**WAC 173-401-533(2)**
80mm Hg at 21C.	
Auto Transmission Fluid Aboveground Storage Tank, 1,000 gallons: Contains lubricating oil. Tank capacity is less than ten thousand gallons and stores a VOC with a vapor pressure less than 80mm Hg at 21C.	WAC 173-401-533(2)(c)
Solvent Recovery Unit, 200 gallons	WAC 173-401-533(2)(a)
Recovered Solvent Tank, 500 gallons HAP-free solvent with vapor pressure ≤ 550 mm Hg	WAC 173-401-533(2)(b)
Waste Solvent Tank, 500 gallons HAP-free solvent with vapor pressure ≤ 550 mm Hg	WAC 173-401-533(2)(b)
Solvent Mixing/Storage Tank, 1,000 gallons HAP-free solvent with vapor pressure ≤ 550 mm Hg	WAC 173-401-533(2)(b)
Paint Mix Room Thinner Tank, 1,000 gallons HAP-free solvent with vapor pressure ≤ 550 mm Hg	WAC 173-401-533(2)(b)
Chassis Black Tank, 750 gallons HAP-free paint with vapor pressure ≤ 80 mm Hg	WAC 173-401-533(2)(b) WAC 173-401-533(2)(c)
Paint Activator Tank, 350 gallons, Vapor pressure ≤ 80 mm Hg	WAC 173-401-533(2)(c)
Paint Tanks, 7 @ 80 gallons each	WAC 173-401-533(2)(a)
Off-Highway Axle Weld Fume Collector	WAC 173-401-533(2)(i)
Small Electrical Power Generators: gasoline fired.	WAC 173-401-533(2)(f)
Small Parts Cleaner Tanks	WAC 173-401-533(2)(a) and WAC 173-401-533(2)(z)

Table 18. Categorically Exempt Insignificant Emission Units

The following units and activities are listed as categorically exempt insignificant emission units per WAC 173-401-532.	
Description	**WAC 173-401-532**
Cab Washer Dry-off Oven: Vent is located in building that contains permitted emissions units and activities from which local ventilation, controls and separate exhaust are provided.	WAC 173-401-532(9)
Lab Fume Hoods: Hood vents are located in building that contains permitted emissions units and activities from which local ventilation, controls and separate exhaust are provided.	WAC 173-401-532(9)
Motor Oil Aboveground Storage Tank: Contains lubricating oil.	WAC 173-401-532(3)
Gear Oil Aboveground Storage Tank: Contains lubricating oil.	WAC 173-401-532(3)
Axle Oil Aboveground Storage Tank: Contains lubricating oil.	WAC 173-401-532(3)
Frame Rail Washer Tank: 200 gallons, water, closed.	WAC 173-401-532(4)
Pressure Washer tanks: 2 @ 50 gallons each, water.	WAC 173-401-532(4)
Fire Protection Water Tank: 300,000 gallons, water	WAC 173-401-532(52) and WAC 173-401-532(4)
Welding Exhaust Dust Collectors: Collect particulate emissions from welding of metal. Activity is performed indoors with particulate emission control. The exhaust is within the building housing the activity and no fugitive particulate emissions enter the environment.	WAC 173-401-532(55)
Small Parts Blast Booth: Sanding, buffing, blasting of metals and plastics. Activity is performed indoors with particulate emission control. The exhaust is within the building housing the activity and no fugitive particulate emissions enter the environment.	WAC 173-401-532(55)
Paint Exhaust (Paint Mix Room, Paint Storage Room, Paint Day Room, Thinner Recycling Room, Hazardous Waste Room, Hazardous Materials Storage Room): Vents are located in building that contains permitted emissions units and activities from which local ventilation, controls and separate exhaust are provided.	WAC 173-401-532(9)
Thinner Sink Exhaust: Vent is located in building that contains permitted emissions units and activities from which local ventilation, controls and separate exhaust are provided.	WAC 173-401-532(9)
Vehicle exhaust from exhaust hoods and fume extractors at engine start-up, end-of-line, final assembly, test department, and dynamometer: Exhaust is from a mobile source powered by an internal combustion engine	WAC 173-401-532(10)
Paint Activator Totes: 259 gallons each, portable.	WAC 173-401-532(42)
Chassis Black Totes: 500 gallons each, portable.	WAC 173-401-532(42)
Battery Wash Tank, contaminated water, closed, 125 gallons.	WAC 173-401-532(4)
Moly Grease Tote, 379 gallons, portable.	WAC 173-401-532 (4), (42), and (69).

The following units and activities are listed as categorically exempt insignificant emission units per WAC 173-401-532.	
Description	**WAC 173-401-532**
Antifreeze Totes, (ethylene glycol), 275 gallons, portable.	WAC 173-401-532 (42)
Antifreeze Tank, (ethylene glycol), closed, 100 gallons.	WAC 173-401-532 (4)
Refrigerant Tanks, (R-134a): 2,000 pounds each, portable.	WAC 173-401-532 (42)
Nitrogen Tank, pressurized, 200 gallons.	WAC 173-401-532 (5)
Paint Booth Maskant Tank, closed, 200 gallons.	WAC 173-401-532 (4)
Waterwash Paint Booth Sump, contaminated water, sludge collection, 12,500 gallons	WAC 173-401-532(114)
Stormwater Storage Tank, closed, 15,000 gallons.	WAC 173-401-532 (4)
Wastewater Effluent Tank, closed, treated wastewater, 3,000 gallons.	WAC 173-401-532 (94)
Wastewater Batch Tanks (2), closed, contaminated wastewater, 65,000 gallons each.	WAC 173-401-532 (94)
Sand Filter, treated wastewater, 4,500 gallons.	WAC 173-401-532(114)
Gravity Settler, treated wastewater, 15,000 gallons.	WAC 173-401-532(114)
Oil/Water Decant Tank, closed, contaminated wastewater, 3,000 gallons.	WAC 173-401-532 (94)
Oil/Water Separator, closed, contaminated wastewater, 1,000 gallons.	WAC 173-401-532 (94)
Oil/Water Separator Filtrate Tank, contaminated wastewater, 90 gallons.	WAC 173-401-532 (94)
Wastewater Chemical Treatment Tank, contaminated wastewater, 3,000 gallons.	WAC 173-401-532 (94) and (114)
Filter Press Tank, wastewater treatment sludge, 150 gallons.	WAC 173-401-532 (94) and (114)
Sludge Tank, wastewater treatment sludge, 5,000 gallons.	WAC 173-401-532 (94) and (114)
Coagulant Drum, wastewater treatment chemical, 55 gallons, portable	WAC 173-401-532 (42)
Lime Slurry Tank, closed, wastewater treatment chemical, 90 gallons.	WAC 173-401-532 (4)
Polymer Tank, closed, wastewater treatment chemical, 90 gallons.	WAC 173-401-532 (4)
Coagulant Drum, wastewater treatment chemical, 55 gallons, portable.	WAC 173-401-532 (42)
Sodium Hydroxide Tote, closed, wastewater treatment chemical.	WAC 173-401-532 (4)
Sulfuric Acid Tote, closed, wastewater treatment chemical.	WAC 173-401-532 (4)

The following units and activities are listed as categorically exempt insignificant emission units per WAC 173-401-532.	
Description	**WAC 173-401-532**
Reverse Osmosis Water Tank, closed, 3,297 gallons.	WAC 173-401-532 (94)
5% Sulfuric Acid Tank, closed, wastewater treatment chemical, 50 gallons.	WAC 173-401-532 (4)
Cooling Water Pumping Unit, non-contact cooling water, 2,230 gallons.	WAC 173-401-532 (121)
Cooling Tower, non-contact cooling water, 3,000 gallons.	WAC 173-401-532 (121)
Truck Leak Test Water Tank, closed, wastewater, 800 gallons.	WAC 173-401-532 (94)
Waste Antifreeze Tank: closed, 200 gallons.	WAC 173-401-532 (4)

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 ☐ Yes ☑ No
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

2021 Actual Emissions per Emissions Unit

Emissions Unit Number (from Form B)	2021 ACTUAL EMISSIONS							
	2021 POUNDS							2021 TONS
	CO	NOx	PM10	PM2.5	SO2	VOC	HAP	GHG
EU-1 Assembly Operations: Highway and Off-Highway Trucks	0	0	0	0	0	5,888	161	274
EU-2 Materials Work	0	0	0	0	0	5,888	161	147
EU-3 Surface Prep: Truck Components	0	0	7	7	0	5,888	161	1,422
EU-4 Coating Operatons: Truck Components & Chassis	0	0	6,352	6,352	0	48,762	371	179
EU-5 Coating Operations: Truck Components	0	0	160	160	0	75,309	522	387
EU-6 Coating Operations: Highway and Off-Highway Trucks and Touch-Up	0	0	1,751	1,751	0	13,034	196	130
EU-7 Coating Mix/Solvent System	0	0	0	0	0	5,888	161	115
EU-8 Gas Fueled Equipment	4,488	5,343	406	406	32	294	0	662
EU-9 Emergency Engines	62	288	20	20	19	23	0	4
Total TONS	2	3	4	4	0	80	1	3,320

NOTES for CO,NOx,SO2,VOC, HAP and PM10 for EU-9:

EU-1: 14.3% point 2, segment 2 and 14.3% point 2, segment 4

EU-2: 14.3% point 2, segment 2 and 14.3% point 2, segment 4

EU-3: 14.3% point 2, segment 2 and 14.3% point 2, segment 4

EU-4: 36% point 2, segment 1 and 14.3% point 2, segment 2 and 14.3% point 2, segment 4

EU-5: 58% point 2, segment 1 and 14.3% point 2, segment 2 and 100% point 2, segment 3 and 14.3% point 2, segment 4

EU-6: 6% point 2, segment 1 and 14.3% point 2, segment 2 and 14.3% point 2, segment 4

EU-7: 14.3% point 2, segment 2 and 14.3% point 2, segment 4

EU-8: 100% point 1, segment 1 and 100% point 1, segment 2

EU-9: Emission factors from AP42 Section 3.3 (Gasoline and Diesel Industrial Engines), Table 3.3-1, Diesel Fuel column

1 Emergency generator @ 380hp and tested 9 hr/yr, diesel and 1 Emergency fire pump @ 235hp and tested 25 hr/yr, diese

Pollutant (lb/yr) = hp x (hr/yr) x (lb/hp-hr emission factor)

CO ef = 6.68 E-03; NOx ef = 0.031; PM10 ef = 2.20 E-03; SO2 ef = 2.05 E-03; TOC ef = 2.5 E-03

NOTES for PM10 (Assume PM10 = PM2.5):

EU-2: Axle weld cartridge dust collector filters air exhaust from welding & grinding. Filter eff. 99.5% @ 0.5 micron. About 1 pound collected over 10 years.

About 0.0005 lbs PM emitted per year (0.1 lb/yr x .005)/0.995 = 0.0005

EU-3: Central Vacuum System. Filter eff. 99.5% @ 0.5 micron. Pounds collected in Year 2021 = 1,395.

About 7 lbs PM emitted (1395 lb/yr x .005)/0.995 = 7

EU-4, EU-5, EU-6 PM10, PM2.5: See PTE Emission Units with PM Control sheet.

Tally "pounds purchase w/o VOC" and multiply by emission factor, then multiply by %filter reduction (e.g. 1 - 0.5 if filters capture 50%

Water Wash booths in EU-5 (Clearcoat, Basecoat, & Manual) have 99.85% particulate filter efficiency.

Dry filter paint booths: Particulate filter efficiency of dry filters is 50%.

AIR OPERATING PERMIT RENEWAL APPLICATION

Form D: Applicability Determinations

FACILITY CHANGES		
Are/were there any…		**If yes…**
Notice of Construction Approval Orders that have been issued but not incorporated into the Air Operating Permit?	☐ Yes ☒ No	Complete Form E for each Approval Order
Off-permit changes according to WAC 173-401-724?	☐ Yes ☒ No	Complete Form F
Section 502(b)(10) changes according to WAC 173-401-722(2)?	☐ Yes ☒ No	Complete Form F
New sources or modifications that did not require a Notice of Construction?	☐ Yes ☒ No	Complete Form G

NEW APPLICABLE REQUIREMENTS		
		If yes…
Are there any new applicable requirements?	☐ Yes ☒ No	Complete Form H
Are there any inapplicable requirements for which the source would like to request to extend the permit shield?	☐ Yes ☒ No	Complete Form H
Does the accidental release prevention regulation apply to the facility? (40 CFR Part 68)	☐ Yes ☒ No	Attach a list of the regulated substances present in processes at the facility and identify the applicable program

CURRENT COMPLIANCE		
		If yes… or NO
Is the source in compliance with all of the conditions of the current permit?	☒ Yes ☐ No	Attach a compliance plan in accordance with WAC 173-401-710(h). 510(2)(h)

Current Permit

Section 8: Inapplicable Requirements

Pursuant to WAC 173-401-640(2), the Puget Sound Clean Air Agency has determined that the requirements listed in the table do not apply to the facility, as of the date of permit issuance, for the reasons specified. The permit shield applies to all requirements so identified.

Table 16. Inapplicable Requirements

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	Standards of Performance for VOC Storage Vessels	Does 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 Regulatory Order 11587 (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 Regulatory Order 11587 (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 Regulatory Order 11587 (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 Regulatory Order 11587 (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.
40 CFR 82, Subpart A		Controls on production and consumption of ozone-depleting substances. Kenworth does not produce or consume ozone depleting substances and would need approval to do so.
40 CFR 82, Subpart B		Motor vehicle air conditioners are serviced by trained and certified technicians using approved refrigerant recycling equipment. Kenworth does not service or repair motor vehicle air conditioners. Trucks on the assembly line are excluded from the definition of "motor vehicle" in 40 CFR 82.32(c).
40 CFR 82, Subpart D		Federal procurement requirements. Kenworth is not a federal agency.
40 CFR 82, Subpart E		Labeling required for containers of products containing certain ozone-depleting substances. Kenworth does not use Class I substances directly in manufacturing processes or does not manufacture products containing Class I substances and would have to apply for approval before using a Class I CFC.
WAC 173-400-105(5)	Continuous Emission Monitoring System requirements	Continuous Emission Monitoring System requirements are inapplicable since Kenworth is not required to use continuous emission monitors to assure compliance.
WAC 173-490-030	Registration requirements	Operating permit sources are exempt from registration under RCW 70.94.161(17).
Puget Sound Clean Air Agency Reg. I: 5.03	Registration Requirements	Puget Sound Clean Air Agency Regulation I, Section 5.03 is inapplicable per statute RCW 70.94.161(17). Kenworth specifically requested that Puget Sound Clean Air Agency determine that Section 5.03 does not apply to welding operations. Puget Sound Clean Air Agency concurs, and also notes that welding operations are exempt from the new source requirements of Puget Sound Clean air Agency Regulation I, Article 6.

Regulation	Description	Basis for Inapplicability
Puget Sound Clean Air Agency Reg. I: 9.04	Continuous Opacity Monitoring systems requirements	Does not apply since Kenworth is not required to use a continuous opacity monitoring system to assure compliance.
Puget Sound Clean Air Agency Reg. I: 9.16(e)		No mobile spray-coating operations conducted at the facility.
Puget Sound Clean Air Agency Reg. I, Article 12	Continuous Emission Monitoring System requirements	Continuous Emission Monitoring System requirements are inapplicable since Kenworth is not required to use continuous emission monitors to assure compliance.
Order of Approval No. 6074 (8/16/95)		Cancelled and superseded by Order of Approval 6074, 8/8/03
Order of Approval No. 6977 (10/21/97)		Cancelled and superseded by Order of Approval 6074, 8/8/03
General Regulatory Order No. 6654 (4/10/97)		Cancelled and superseded by Order of Approval 6074, 8/8/03
Order of Approval No. 6074, Condition 5 (8/8/03)	Annual status report for VOC limits	On August 15, 2001 Kenworth Renton submitted a letter to PSCAA stating that according to Section V.Q.4 of the (August 24, 2000) permit, primers had achieved 3.5 lbs/gal VOC content, and chassis primer with 2.7 lbs/gal VOC content was acceptable for use. Therefore continued annual status reporting was no longer required.
Order of Approval No. 6074 (8/8/03)		Cancelled and superseded by Regulatory Order 11587 (1/16/19)
Order of Approval No. 8884 (7/24/03)		Cancelled and superseded by Regulatory Order 11587 (1/16/19)
Order of Approval No. 8344 (7/24/03)		Cancelled and superseded by Regulatory Order 11587 (1/16/19)

AIR OPERATING PERMIT RENEWAL APPLICATION

Form D: Applicability Determinations

REQUESTED CHANGES		
Are there any requested changes to…		**If yes…**
Testing conditions?	☐ Yes ☒ No	Complete Form I
Monitoring conditions (other than those being replaced by CAM)?	☒ Yes ☐ No	
Recordkeeping conditions?	☐ Yes ☒ No	
Reporting conditions?	☐ Yes ☒ No	
Non-applicable conditions?	☐ Yes ☒ No	
Any conditions?	☐ Yes ☒ No	

REQUESTED CHANGES		
Are there any…		**If yes…**
Changes to the Process Descriptions in the current Statement of Basis?	☐ Yes ☒ No	Please attach details or marked up copy of current permit or Statement of Basis. Only the applicable SIP updates need to be made to the SOB. Please refer to the attached red-lined current permit which includes SIP updates.
Changes to the Emission Unit Summary in the current Statement of Basis?	☐ Yes ☒ No	
Changes to the Regulatory Determinations in the current Statement of Basis?	☒ Yes ☐ No	
Changes to the Insignificant Emission Units listed in the current Statement of Basis?	☐ Yes ☒ No	

Form I: Requested Changes

For each condition for which you would like to request a change to your current permit, please list the permit condition, requested change, and the reason for the change in the table below.

Condition #	Requested Change	Reason
2.7, first paragraph, 3rd sentence stating "permittee shall obtain an annual certification from the vendor"	For clarification purposes a suggested change is: … "the permittee shall obtain an annual certification from the vendor which may consist of a letter (sent via mail or email); or a spreadsheet of formulations; or similar information stating or showing that all the formulations supplied to the facility meet the following limits:"	The original statement seems to be vague enough to allow forms of "certification" by the vendor. However, the reality is that in some instances a certification is only interpreted as being a "letter" with a certification statement. The alternative (and more detailed) formulation spreadsheet should also be allowed to be considered as a valid form of "certification" by the vendor. Therefore, in order to clarify valid options (in addition to a letter with a certification statement); Kenworth respectfully requests that the statement include some of the specific options that can be accepted as a "certification."

REQUESTED CHANGE:

For clarification purposes a suggested change is: … “the permittee shall obtain an annual certification from the vendor **which may consist of a letter (sent via mail or email); or a spreadsheet of formulations; or similar information stating or showing** that all the formulations supplied to the facility meet the following limits:”

REASON:

The original statement seems to be vague enough to allow forms of “certification” by the vendor. However, the reality is that in some instances a certification is only interpreted as being a “letter” with a certification statement. The alternative (and more detailed) formulation spreadsheet should also be allowed to be considered as a valid form of “certification” by the vendor. Therefore, in order to clarify valid options (in addition to a letter with a certification statement); Kenworth respectfully requests that the statement include some of the specific options that can be accepted as a “certification.”

FORM C: EMISSIONS BACKUP INFORMATION

2021 ACTUAL & PTE EMISSIONS

2021 Actual Emissions per Emissions Unit

Emissions Unit Number (from Form B)	2021 ACTUAL EMISSIONS							
	2021 POUNDS							2021 TONS
	CO	NOx	PM10	PM2.5	SO2	VOC	HAP	GHG
EU-1 Assembly Operations: Highway and Off-Highway Trucks	0	0	0	0	0	5,888	161	274
EU-2 Materials Work	0	0	0	0	0	5,888	161	147
EU-3 Surface Prep: Truck Components	0	0	7	7	0	5,888	161	1,422
EU-4 Coating Operatons: Truck Components & Chassis	0	0	6,352	6,352	0	48,762	371	179
EU-5 Coating Operations: Truck Components	0	0	160	160	0	75,309	522	387
EU-6 Coating Operations: Highway and Off-Highway Trucks and Touch-Up	0	0	1,751	1,751	0	13,034	196	130
EU-7 Coating Mix/Solvent System	0	0	0	0	0	5,888	161	115
EU-8 Gas Fueled Equipment	4,488	5,343	406	406	32	294	0	662
EU-9 Emergency Engines	62	288	20	20	19	23	0	4
Total TONS	2	3	4	4	0	80	1	3,320

NOTES for CO,NOx,SO2,VOC, HAP and PM10 for EU-9:

EU-1: 14.3% point 2, segment 2 and 14.3% point 2, segment 4

EU-2: 14.3% point 2, segment 2 and 14.3% point 2, segment 4

EU-3: 14.3% point 2, segment 2 and 14.3% point 2, segment 4

EU-4: 36% point 2, segment 1 and 14.3% point 2, segment 2 and 14.3% point 2, segment 4

EU-5: 58% point 2, segment 1 and 14.3% point 2, segment 2 and 100% point 2, segment 3 and 14.3% point 2, segment 4

EU-6: 6% point 2, segment 1 and 14.3% point 2, segment 2 and 14.3% point 2, segment 4

EU-7: 14.3% point 2, segment 2 and 14.3% point 2, segment 4

EU-8: 100% point 1, segment 1 and 100% point 1, segment 2

EU-9: Emission factors from AP42 Section 3.3 (Gasoline and Diesel Industrial Engines), Table 3.3-1, Diesel Fuel column

1 Emergency generator @ 380hp and tested 9 hr/yr, diesel and 1 Emergency fire pump @ 235hp and tested 25 hr/yr, diese

Pollutant (lb/yr) = hp x (hr/yr) x (lb/hp-hr emission factor)

CO ef = 6.68 E-03; NOx ef = 0.031; PM10 ef = 2.20 E-03; SO2 ef = 2.05 E-03; TOC ef = 2.5 E-03

NOTES for PM10 (Assume PM10 = PM2.5):

EU-2: Axle weld cartridge dust collector filters air exhaust from welding & grinding. Filter eff. 99.5% @ 0.5 micron. About 1 pound collected over 10 years.

About 0.0005 lbs PM emitted per year (0.1 lb/yr x .005)/0.995 = 0.0005

EU-3: Central Vacuum System. Filter eff. 99.5% @ 0.5 micron. Pounds collected in Year 2021 = 1,395.

About 7 lbs PM emitted (1395 lb/yr x .005)/0.995 = 7

EU-4, EU-5, EU-6 PM10, PM2.5: See PTE Emission Units with PM Control sheet.

Tally "pounds purchase w/o VOC" and multiply by emission factor, then multiply by %filter reduction (e.g. 1 - 0.5 if filters capture 50%

Water Wash booths in EU-5 (Clearcoat, Basecoat, & Manual) have 99.85% particulate filter efficiency.

Dry filter paint booths: Particulate filter efficiency of dry filters is 50%.

Registration Number:	17796
Facility:	**Kenworth Truck Co - Renton**
Source Address:	1601 N 8th St, Renton, WA 98057
Primary Contact Name:	Tom Nelson (primary)
Primary Contact Phone:	(425) 227-5849
Primary Contact Email:	tom.nelson@paccar.com

Total 2021 Facility Emissions:

Pollutant	Tons Emitted in 2021
CO (Carbon Monoxide)	2
NOx (Nitrogen Oxides)	3
PM10 (Particulate Matter < 10 microns)	0
SOx (Sulfur Oxides)	0
VOC (Volatile Organic Compounds)	80
HAP (Hazardous Air Pollutants)	1

Emission report submitted by:

Name: _____ Title: _____
(please print)

Signature:_____ Date: _____

Print a paper copy of this page, sign and date it, and mail to:
Betsy Wheelock
Puget Sound Clean Air Agency
1904 Third Ave, Suite 105
Seattle, WA 98101

Reg	SourceName	SourceAddress	SourceCity	SourceZip
17796	Kenworth Truck Co - Renton	1601 N 8th St	Renton	98057

SourceCounty	MailAddress	MailCity	MailState	MailZip	Contact1Name
KING	PO Box 9001	Renton	WA	98057-900	Tom Nelson (prima

Contact1Title	Contact1Phone	Contact1Email	Contact2Name	Contact2Title
Facilities Eng Manag	(425) 227-5849	tom.nelson@paccar.	Darrin Child	Plant Manager

Contact2Phone	Contact2Email	NAICSCode	Latitude	Longitude	OperationHoursPerDay
(425) 227-5801	Darrin.Child@PACCAR.c	336120	47.496361	-122.195932	8

OperationDaysPerWeek	OperationWeeksPerYear	OperationStartTime	Throughput%ForDecFeb
5	52	6:30 AM	25

Throughput%ForMarMay	Throughput%ForJunAug	Throughput%ForSepNov
25	25	25

Reg	Point	Description	StackHeightInFeet	StackDiameterInFeet
17796	1	Fuel Burned	36	1.5
17796	2	Surface Coating	36	2

ExitGasTemperatureInF	ExitGasFlowRateInCFM	InstalledYear	InactiveYear	EmissionUnitType
400	10000	1993		290
65	20000	1993		450

Reg	Point	Segment	Description	SCC_Code	ProcessQuantity2021
17796	1	1	Natural Gas Combustion	1-02-006-02	204.98
17796	1	2	Natural Gas Combustion	1-02-006-03	380.68
17796	2	1	Topcoat Operations	4-02-025-01	38616
17796	2	2	Parts/Equipment Cleaning	4-02-025-02	18378
17796	2	3	Primer Operations	4-02-025-01	150
17796	2	4	Undercoat/Seal/Lubricate/Adhesive (	4-02-025-99	387241

ProcessQuantity2020	ProcessUnits	EPAPrimaryControlMeasure(	EPASecondaryControlMeasureC
181	1000 Therms	0	
337	1000 Therms	0	
33829	Gal	127	
15919	Gal	0	
145	Gal	127	
307485	Gal	103	

HeatContentInMillionBTUs	HeatContentFuelTypeBurned	SulfurContent%	AshContent%
		0.003	
		0.003	

Reg	Point	Segment	CAS	ChemicalName	EmissionQuantityFor2021InPounds	EmissionQuantityFor2020InPounds	MethodCode	VOC?	TAC?	HAP?
17796	1	1	43207	Other Volatile Organic Compounds (VOC)	103	91	3	Yes	No	No
17796	1	1	7664-41-7	Ammonia (NH3)	0	0		No	Yes	No
17796	1	1	CO	Carbon Monoxide	1571	1389	3	No	No	No
17796	1	1	NO2	Nitrogen Oxides	1870	1653	3	No	No	No
17796	1	1	PM10	Particulate Matter	142	126	3	No	No	No
17796	1	1	PM2.5	Particulate Matter	142	126	3	No	No	No
17796	1	1	SO2	Sulfur Oxides (including 7446-09-05)	11	10	3	No	Yes	No
17796	1	2	43207	Other Volatile Organic Compounds (VOC)	191	169	3	Yes	No	No
17796	1	2	7664-41-7	Ammonia (NH3)	0	0		No	Yes	No
17796	1	2	CO	Carbon Monoxide	2917	2579	3	No	No	No
17796	1	2	NO2	Nitrogen Oxides	3473	3070	3	No	No	No
17796	1	2	PM10	Particulate Matter	264	233	3	No	No	No
17796	1	2	PM2.5	Particulate Matter	264	233	3	No	No	No
17796	1	2	SO2	Sulfur Oxides (including 7446-09-05)	21	18	3	No	Yes	No
17796	2	1	100-41-4	Ethyl benzene	177	16	2	Yes	Yes	Yes
17796	2	1	100-51-6	Benzyl alcohol	0	0	2	Yes	No	No
17796	2	1	101-68-8	Methylene bis(phenyl isocyanate)(Methylene dipher	0	0	2	Yes	Yes	Yes
17796	2	1	106-65-0	Dimethyl succinate	0	0	2	Yes	No	No
17796	2	1	106-97-8	Butane	3	11	2	Yes	No	No
17796	2	1	107-21-1	Ethylene glycol	0	0	2	Yes	Yes	Yes
17796	2	1	107-87-9	2-Pentanone (Methyl propyl ketone)	0	0	2	Yes	No	No
17796	2	1	107-98-2	Propylene glycol mono-methyl ether	0	4	2	Yes	Yes	No
17796	2	1	108-10-1	Methyl isobutyl ketone (MIBK; Hexone)	0	2	2	Yes	Yes	Yes
17796	2	1	108-65-6	Methyloxy-2-propanol acetate	3	3	2	Yes	No	No
17796	2	1	108-67-8	Mesitylene (1,3,5-Trimethylbenzene)	4	4	2	Yes	Yes	No
17796	2	1	108-88-3	Toluene	6	26	2	Yes	Yes	Yes
17796	2	1	108-94-1	Cyclohexanone	0	0	2	Yes	No	No
17796	2	1	109-99-9	Tetrahydrofuran	0	0	2	Yes	Yes	No
17796	2	1	110-12-3	Methyl isoamyl ketone	0	0		Yes	No	No
17796	2	1	110-19-0	Isobutyl acetate	2	10	2	Yes	No	No
17796	2	1	110-43-0	Methyl n-amyl ketone	22763	20603	2	Yes	No	No
17796	2	1	110-82-7	Cyclohexane	0	0	2	Yes	Yes	No
17796	2	1	111-76-2	2-Butoxyethanol (Butyl cellosolve; Ethylene glycol m	340	339	2	Yes	Yes	No
17796	2	1	1119-40-0	Dimethyll glutarate	0	6	2	Yes	No	No
17796	2	1	112-07-2	2-Butoxy Ethyl Acetate	5	2	2	Yes	No	No
17796	2	1	123-54-6	Acetyl acetone	3110	2447	2	Yes	No	No
17796	2	1	123-86-4	n-Butyl acetate	29307	26311	2	Yes	No	No
17796	2	1	1330-20-7	Xylenes	360	10	2	Yes	Yes	Yes
17796	2	1	141-78-6	Ethyl acetate	35560	30739	2	Yes	No	No
17796	2	1	142-82-5	Heptane (n-Heptane)	5045	4385	2	Yes	No	No
17796	2	1	1760-24-3	Amino propyl trimethoxysilane	0	2	2	Yes	No	No
17796	2	1	25322-68-3	Polyethylene glycol, 400	1	2	2	Yes	No	No
17796	2	1	26447-40-5	Diphenylmethane diisocyanate	0	0	2	Yes	No	No
17796	2	1	2807-30-9	2-Propoxy-ethanol	0	2	2	Yes	No	Yes
17796	2	1	28182-81-2	Homopolymer of HDI	0	0	2	Yes	No	No
17796	2	1	41556-26-7	Bis-(1,2,2,6,6-pentamethyl-4-piperidinyl)secacate	247	259	2	Yes	No	No
17796	2	1	43207	Other Volatile Organic Compounds (VOC)	6192	5440	2	Yes	No	No
17796	2	1	540-88-5	tert-Butyl acetate	2144	1906	2	Yes	Yes	No
17796	2	1	627-93-0	Dimethyl adipate	0	0	2	Yes	No	No
17796	2	1	628-63-7	n-Amyl acetate	506	410	2	Yes	No	No
17796	2	1	64741-65-7	Naphtha (petroleum) heavy alkylated (isopar)	462	399	2	Yes	No	No
17796	2	1	64742-47-8	Petroleum distillate, hydrotreated light	118	86	2	Yes	No	No
17796	2	1	64742-48-9	Aliphatic hydrocarbon solvent	1829	1521	2	Yes	No	No
17796	2	1	64742-88-7	Mineral spirits	196	0	2	Yes	No	No
17796	2	1	64742-89-8	Petroleum naphtha, paraffins & naphthenes	0	2	2	Yes	No	No
17796	2	1	64742-94-5	Heavy aromatic naphtha (petrol)	0	0	2	Yes	No	No
17796	2	1	64742-95-6	Volatile Petroleum Distillate	548	392	2	Yes	No	No
17796	2	1	64742-96-7	Hydrocarbon solvent	0	0	2	Yes	No	No
17796	2	1	67-63-0	Isopropyl alcohol (Isopropanol)	3343	3066	2	Yes	Yes	No
17796	2	1	67-64-1	Acetone	3437	2063	2	No	No	No
17796	2	1	68476-85-7	Liquified petroleum gas	2	8	2	Yes	No	No
17796	2	1	68476-86-8	Propane/isobutane(1)	1148	14	2	Yes	No	No
17796	2	1	71-36-3	n-Butyl alcohol	641	535	2	Yes	No	No
17796	2	1	74-98-6	Propane	3	0	2	Yes	No	No

Reg	Point	Segment	CAS	ChemicalName	EmissionQuantityFor2021InPounds	EmissionQuantityFor2020InPounds	MethodCode	VOC?	TAC?	HAP?
17796	2	1	75-28-5	2-Methyl propane (isobutane)	0	0	2	Yes	No	No
17796	2	1	763-69-9	3-Ethyl ethoxypropionate	1883	1786	2	Yes	No	No
17796	2	1	7664-41-7	Ammonia (NH3)	0	0	2	No	Yes	No
17796	2	1	78-10-4	Ethyl silicate	6	4	2	Yes	No	No
17796	2	1	78-83-1	Isobutyl alcohol	0	4	2	Yes	No	No
17796	2	1	78-92-2	sec-Butyl alcohol	0	0	2	Yes	No	No
17796	2	1	78-93-3	2-Butanone (MEK; Methyl ethyl ketone)	2616	2402	2	Yes	Yes	No
17796	2	1	79-09-4	Proprionic acid	0	0		Yes	No	No
17796	2	1	79-20-9	Methyl acetate	0	0	2	No	No	No
17796	2	1	80-62-6	Methyl methacrylate	37	33	2	Yes	Yes	Yes
17796	2	1	8030-30-6	Naphtha (Rubber solvents)	0	0	2	Yes	No	No
17796	2	1	8032-32-4	VM & P Naphtha	0	1	2	Yes	No	No
17796	2	1	8052-41-3	Stoddard solvent	280	216	2	Yes	No	No
17796	2	1	822-06-0	Hexamethylene diisocyanate	0	0	2	Yes	Yes	Yes
17796	2	1	872-50-4	Amide, Cyclic	0	0	2	Yes	No	No
17796	2	1	90-72-2	Tri (Dimethylaminomethyl) Phenol	0	1	2	Yes	No	No
17796	2	1	9016-87-9	Polymeric MD1 type	0	0	2	Yes	No	No
17796	2	1	91-20-3	Naphthalene	0	0	2	Yes	Yes	Yes
17796	2	1	95-63-6	1,2,4-Trimethyl benzene	204	150	2	Yes	Yes	No
17796	2	1	98-82-8	Cumene (Isopropylbenzene)	4	3	2	Yes	Yes	Yes
17796	2	1	MNCOMP	Manganese & Compounds	0	0		No	Yes	No
17796	2	2	100-41-4	Ethyl benzene	0	0	2	Yes	Yes	Yes
17796	2	2	100-51-6	Benzyl alcohol	0	0	2	Yes	No	No
17796	2	2	100-66-3	Anisole	0	0	2	Yes	No	No
17796	2	2	106-97-8	Butane	6	9	2	Yes	No	No
17796	2	2	107-41-5	Hexylene glycol	0	0	2	Yes	No	No
17796	2	2	107-98-2	Propylene glycol mono-methyl ether	0	0	2	Yes	Yes	No
17796	2	2	108-10-1	Methyl isobutyl ketone (MIBK; Hexone)	0	0	2	Yes	Yes	Yes
17796	2	2	108-87-2	Methylcyclohexane	60	33	2	Yes	No	No
17796	2	2	108-88-3	Toluene	1033	741	2	Yes	Yes	Yes
17796	2	2	110-43-0	Methyl n-amyl ketone	0	0	2	Yes	No	No
17796	2	2	110-54-3	Hexane (n-Hexane)	0	0	2	Yes	Yes	Yes
17796	2	2	110-82-7	Cyclohexane	0	0	2	Yes	Yes	No
17796	2	2	111-42-2	Diethanolamine	0	0	2	Yes	Yes	Yes
17796	2	2	111-65-9	Octane	0	0	2	Yes	No	No
17796	2	2	111-76-2	2-Butoxyethanol (Butyl cellosolve; Ethylene glycol m	13	22	2	Yes	Yes	No
17796	2	2	1119-40-0	Dimethyll glutarate	0	0	2	Yes	No	No
17796	2	2	112-34-5	Diethylene glycol monbutyl ether [glycol ether]	0	0	2	Yes	No	Yes
17796	2	2	123-86-4	n-Butyl acetate	271	151	2	Yes	No	No
17796	2	2	1330-20-7	Xylenes	0	0	2	Yes	Yes	Yes
17796	2	2	138-86-3	Dipentene	0	0	2	Yes	No	No
17796	2	2	141-43-5	Ethanolamine (Monethanol amine)	0	0	2	Yes	No	No
17796	2	2	141-78-6	Ethyl acetate	15493	11120	2	Yes	No	No
17796	2	2	142-82-5	Heptane (n-Heptane)	3211	2044	2	Yes	No	No
17796	2	2	34590-94-8	Dipropylene glycol methyl ether	0	0	2	Yes	No	No
17796	2	2	43207	Other Volatile Organic Compounds (VOC)	17	17	2	Yes	No	No
17796	2	2	526-95-4	Gluconic acid	800	1100	2	Yes	No	No
17796	2	2	64-17-5	Ethyl alcohol (Ethanol)	4661	3359	2	Yes	No	No
17796	2	2	646-06-0	Glycol methylene ether	0	0	2	Yes	No	No
17796	2	2	64741-65-7	Naphtha (petroleum) heavy alkylated (isopar)	1070	713	2	Yes	No	No
17796	2	2	64742-47-8	Petroleum distillate, hydrotreated light	59	117	2	Yes	No	No
17796	2	2	64742-48-9	Aliphatic hydrocarbon solvent	0	0	2	Yes	No	No
17796	2	2	64742-88-7	Mineral spirits	0	0	2	Yes	No	No
17796	2	2	64742-89-8	Petroleum naphtha, paraffins & naphthenes	9356	6706	2	Yes	No	No
17796	2	2	67-56-1	Methyl alcohol (Methanol)	0	0	2	Yes	Yes	Yes
17796	2	2	67-63-0	Isopropyl alcohol (Isopropanol)	3882	4138	2	Yes	Yes	No
17796	2	2	67-64-1	Acetone	71567	51321	2	No	No	No
17796	2	2	6834-92-0	Sodium Metasilicate	0	0		No	No	No
17796	2	2	68476-85-7	Liquified petroleum gas	0	0	2	Yes	No	No
17796	2	2	68476-86-8	Propane/isobutane(1)	0	0	2	Yes	No	No
17796	2	2	71-36-3	n-Butyl alcohol	0	0	2	Yes	No	No
17796	2	2	74-98-6	Propane	26	35	2	Yes	No	No
17796	2	2	75-28-5	2-Methyl propane (isobutane)	0	1	2	Yes	No	No
17796	2	2	78-93-3	2-Butanone (MEK; Methyl ethyl ketone)	0	0	2	Yes	Yes	No

Reg	Point	Segment	CAS	ChemicalName	EmissionQuantityFor2021InPounds	EmissionQuantityFor2020InPounds	MethodCode	VOC?	TAC?	HAP?
17796	2	2	79-20-9	Methyl acetate	0	0	2	No	No	No
17796	2	2	8032-32-4	VM & P Naphtha	0	0	2	Yes	No	No
17796	2	2	8052-41-3	Stoddard solvent	11	11	2	Yes	No	No
17796	2	2	872-50-4	Amide, Cyclic	0	0	2	Yes	No	No
17796	2	2	9002-93-1	Octylphenoxypolyethanolnonionics urfact	0	0	2	Yes	No	No
17796	2	2	9016-45-9	Nonylphenoxy-poly(Ethyleneoxy) Ethanol	0	0	2	Yes	No	No
17796	2	2	9036-19-5	Octylphenoxy Polyethoxyethanol	0	0	2	Yes	No	No
17796	2	2	919-30-2	Amino propyl triethoxysilane	0	0	2	Yes	No	No
17796	2	2	95-63-6	1,2,4-Trimethyl benzene	0	0	2	Yes	Yes	No
17796	2	3	100-41-4	Ethyl benzene	2	4	2	Yes	Yes	Yes
17796	2	3	101-68-8	Methylene bis(phenyl isocyanate)(Methylene dipher	0	0	2	Yes	Yes	Yes
17796	2	3	106-97-8	Butane	0	0	2	Yes	No	No
17796	2	3	107-21-1	Ethylene glycol	0	0	2	Yes	Yes	Yes
17796	2	3	107-87-9	2-Pentanone (Methyl propyl ketone)	0	0	2	Yes	No	No
17796	2	3	107-98-2	Propylene glycol mono-methyl ether	0	0	2	Yes	Yes	No
17796	2	3	108-10-1	Methyl isobutyl ketone (MIBK; Hexone)	9	18	2	Yes	Yes	Yes
17796	2	3	108-21-4	Isopropyl acetate	0	0	2	Yes	No	No
17796	2	3	108-65-6	Methyloxy-2-propanol acetate	39	69	2	Yes	No	No
17796	2	3	108-67-8	Mesitylene (1,3,5-Trimethylbenzene)	0	0	2	Yes	Yes	No
17796	2	3	108-88-3	Toluene	3	2	2	Yes	Yes	Yes
17796	2	3	108-94-1	Cyclohexanone	0	0	2	Yes	No	No
17796	2	3	110-12-3	Methyl isoamyl ketone	3	2	2	Yes	No	No
17796	2	3	110-19-0	Isobutyl acetate	0	0	2	Yes	No	No
17796	2	3	110-43-0	Methyl n-amyl ketone	37	23	2	Yes	No	No
17796	2	3	111-76-2	2-Butoxyethanol (Butyl cellosolve; Ethylene glycol m	0	0	2	Yes	Yes	No
17796	2	3	112-07-2	2-Butoxy Ethyl Acetate	20	9	2	Yes	No	No
17796	2	3	112-34-5	Diethylene glycol monbutyl ether [glycol ether]	2	0	2	Yes	No	Yes
17796	2	3	123-86-4	n-Butyl acetate	26	71	2	Yes	No	No
17796	2	3	1330-20-7	Xylenes	7	16	2	Yes	Yes	Yes
17796	2	3	1330-78-5	Tricresyl phosphate (1)	0	0	2	Yes	No	No
17796	2	3	141-78-6	Ethyl acetate	42	64	2	Yes	No	No
17796	2	3	1760-24-3	Amino propyl trimethoxysilane	0	0	2	Yes	No	No
17796	2	3	25068-38-6	Epoxy resin	11	15		Yes	No	No
17796	2	3	26447-40-5	Diphenylmethane diisocyanate	0	0	2	Yes	No	No
17796	2	3	2807-30-9	2-Propoxy-ethanol	0	0	2	Yes	No	Yes
17796	2	3	41556-26-7	Bis-(1,2,2,6,6-pentamethyl-4-piperidinyl)secacate	0	0		Yes	No	No
17796	2	3	43207	Other Volatile Organic Compounds (VOC)	2	0	2	Yes	No	No
17796	2	3	540-88-5	tert-Butyl acetate	0	0	2	Yes	Yes	No
17796	2	3	584-84-9	Toluene-2,4-diisocyanate (TDI)	0	0	2	Yes	Yes	Yes
17796	2	3	64-17-5	Ethyl alcohol (Ethanol)	0	0	2	Yes	No	No
17796	2	3	64741-65-7	Naphtha (petroleum) heavy alkylated (isopar)	0	0	2	Yes	No	No
17796	2	3	64742-88-7	Mineral spirits	0	0	2	Yes	No	No
17796	2	3	64742-89-8	Petroleum naphtha, paraffins & naphthenes	0	0	2	Yes	No	No
17796	2	3	64742-94-5	Heavy aromatic naphtha (petrol)	2	0	2	Yes	No	No
17796	2	3	64742-95-6	Volatile Petroleum Distillate	0	0	2	Yes	No	No
17796	2	3	67-56-1	Methyl alcohol (Methanol)	0	0	2	Yes	Yes	Yes
17796	2	3	67-63-0	Isopropyl alcohol (Isopropanol)	0	0	2	Yes	Yes	No
17796	2	3	67-64-1	Acetone	234	259	2	No	No	No
17796	2	3	68476-85-7	Liquified petroleum gas	23	60	2	Yes	No	No
	2	3	71-23-8	n-Propyl alcohol	35	0	2	Yes	No	No
17796	2	3	71-36-3	n-Butyl alcohol	26	67	2	Yes	No	No
17796	2	3	74-98-6	Propane	0	0	2	Yes	No	No
17796	2	3	75-28-5	2-Methyl propane (isobutane)	0	0	2	Yes	No	No
17796	2	3	7664-41-7	Ammonia (NH3)	0	0	2	No	Yes	No
17796	2	3	78-83-1	Isobutyl alcohol	20	0	2	Yes	No	No
17796	2	3	78-93-3	2-Butanone (MEK; Methyl ethyl ketone)	37	36	2	Yes	Yes	No
17796	2	3	8032-32-4	VM & P Naphtha	0	0	2	Yes	No	No
17796	2	3	8052-41-3	Stoddard solvent	0	0	2	Yes	No	No
17796	2	3	85-68-7	Butyl Benzyl Phthalate	0	0	2	Yes	No	No
17796	2	3	90-72-2	Tri (Dimethylaminomethyl) Phenol	0	0	2	Yes	No	No
17796	2	3	9004-70-0	Wet Nitrocellolose	0	0	2	Yes	No	No
17796	2	3	9016-87-9	Polymeric MD1 type	0	0	2	Yes	No	No
17796	2	3	91-20-3	Naphthalene	0	0		Yes	Yes	Yes
17796	2	3	95-63-6	1,2,4-Trimethyl benzene	0	0	2	Yes	Yes	No

Reg	Point	Segment	CAS	ChemicalName	EmissionQuantityFor2021InPounds	EmissionQuantityFor2020InPounds	MethodCode	VOC?	TAC?	HAP?
17796	2	3	98-82-8	Cumene (Isopropylbenzene)	0	0	2	Yes	Yes	Yes
17796	2	4	100-41-4	Ethyl benzene	0	0	2	Yes	Yes	Yes
17796	2	4	100-42-5	Styrene	21	12	2	Yes	Yes	Yes
17796	2	4	101-68-8	Methylene bis(phenyl isocyanate)(Methylene dipher	1	0	2	Yes	Yes	Yes
17796	2	4	102-71-6	Triethanolamine	0	0	2	Yes	No	No
17796	2	4	106-65-0	Dimethyl succinate	0	0	2	Yes	No	No
17796	2	4	106-97-8	Butane	1	0	2	Yes	No	No
17796	2	4	107-21-1	Ethylene glycol	36	20	2	Yes	Yes	Yes
17796	2	4	107-98-2	Propylene glycol mono-methyl ether	0	0	2	Yes	Yes	No
17796	2	4	108-10-1	Methyl isobutyl ketone (MIBK; Hexone)	0	0	2	Yes	Yes	Yes
17796	2	4	108-44-1	m-Toluidine	0	0	2	Yes	No	No
17796	2	4	108-67-8	Mesitylene (1,3,5-Trimethylbenzene)	0	0	2	Yes	Yes	No
17796	2	4	108-88-3	Toluene	0	0	2	Yes	Yes	Yes
17796	2	4	109-66-0	Pentane	83	184	2	Yes	No	No
17796	2	4	109-87-5	Methylal	0	0	2	Yes	No	No
17796	2	4	110-43-0	Methyl n-amyl ketone	0	0	2	Yes	No	No
17796	2	4	110-54-3	Hexane (n-Hexane)	0	0	2	Yes	Yes	Yes
17796	2	4	110-82-7	Cyclohexane	83	184	2	Yes	Yes	No
17796	2	4	111-30-8	Glutaraldehyde	0	0	2	Yes	Yes	No
17796	2	4	111-76-2	2-Butoxyethanol (Butyl cellosolve; Ethylene glycol m	0	0	2	Yes	Yes	No
17796	2	4	1119-40-0	Dimethyll glutarate	0	0	2	Yes	No	No
17796	2	4	112-34-5	Diethylene glycol monbutyl ether [glycol ether]	0	0	2	Yes	No	Yes
17796	2	4	115-07-1	Propylene	0	0		No	Yes	No
17796	2	4	115-10-6	Dimethyl ether propellant	195	430	2	Yes	No	No
17796	2	4	118-52-5	1,3-Dichloro-5,5-dimethyl hydantoin	0	0		Yes	No	No
17796	2	4	123-31-9	Hydroquinone	0	0	2	Yes	No	Yes
17796	2	4	123-42-2	Diacetone alcohol	1	0	2	Yes	No	No
17796	2	4	123-86-4	n-Butyl acetate	2	2	2	Yes	No	No
17796	2	4	126-06-7	Dimethylhydantoin,5-,1-BR-3-CI-5	0	0		Yes	No	No
17796	2	4	1303-96-4	Borate (anhydrous and pentahydrate)	0	0	2	No	No	No
17796	2	4	131-11-3	Dimethyl phthalate	0	0		Yes	No	Yes
17796	2	4	1310-58-3	Potassium hydroxide	0	0		No	No	No
17796	2	4	1330-20-7	Xylenes	1	1	2	Yes	Yes	Yes
17796	2	4	141-43-5	Ethanolamine (Monethanol amine)	0	0	2	Yes	No	No
17796	2	4	141-78-6	Ethyl acetate	0	0	2	Yes	No	No
17796	2	4	142-82-5	Heptane (n-Heptane)	0	0	2	Yes	No	No
17796	2	4	1760-24-3	Amino propyl trimethoxysilane	275	287		Yes	No	No
17796	2	4	24448-20-2	Ethoxylated bisphenol dimethylacrylate(1)	149	75	2	Yes	No	No
17796	2	4	25013-15-4	Vinyl toluene	0	0	2	Yes	No	No
17796	2	4	25551-13-7	Trimethyl benzene	0	0		Yes	No	No
17796	2	4	34590-94-8	Dipropylene glycol methyl ether	0	0	2	Yes	No	No
	2	4	4098-71-9	Isophorone Diisocyanate	1	0	2	Yes	No	No
17796	2	4	4253-34-3	Methyltriacetroxysilane	0	0		Yes	No	No
17796	2	4	43207	Other Volatile Organic Compounds (VOC)	4	1	2	Yes	No	No
17796	2	4	497-19-8	Sodium Carbonate	0	0		No	No	No
17796	2	4	50-00-0	Formaldehyde	0	0		Yes	Yes	Yes
17796	2	4	526-95-4	Gluconic acid	0	0		Yes	No	No
17796	2	4	56-81-5	Glycerol	0	0	2	Yes	No	No
17796	2	4	57-55-6	Propylene Glycol	0	0		No	Yes	No
17796	2	4	60-29-7	Ethyl ether	0	0	2	Yes	No	No
17796	2	4	61788-76-9	Chloro alkanes	0	0	2	Yes	No	No
17796	2	4	627-93-0	Dimethyl adipate	0	0	2	Yes	No	No
17796	2	4	63449-39-8	Chlorinated paraffin	0	0	2	Yes	No	No
17796	2	4	64-17-5	Ethyl alcohol (Ethanol)	0	0	2	Yes	No	No
17796	2	4	64741-44-2	Mineral seal oil	0	0		Yes	No	No
17796	2	4	64741-88-4	Paraffinic distillate, solvent refined	0	0	2	Yes	No	No
17796	2	4	64742-01-4	Residual oils (petroleum) solvent refined	0	0		Yes	No	No
17796	2	4	64742-46-7	Petroleum distillates	0	0	2	Yes	No	No
17796	2	4	64742-47-8	Petroleum distillate, hydrotreated light	3	3	2	Yes	No	No
17796	2	4	64742-48-9	Aliphatic hydrocarbon solvent	1	0	2	Yes	No	No
17796	2	4	64742-52-5	Hydrotreated light petroleum distillate	0	0	2	Yes	No	No
17796	2	4	64742-53-6	Napthenic distillate	0	0	2	Yes	No	No
17796	2	4	64742-54-7	Distillates (petroleum) hydrofvld	0	0	2	Yes	No	No
17796	2	4	64742-55-8	Aliphatic hydrocarbon, sulfurized	0	0		Yes	No	No

Reg	Point	Segment	CAS	ChemicalName	EmissionQuantityFor2021InPounds	EmissionQuantityFor2020InPounds	MethodCode	VOC?	TAC?	HAP?
17796	2	4	64742-88-7	Mineral spirits	16	24	2	Yes	No	No
17796	2	4	64742-89-8	Petroleum naphtha, paraffins & naphthenes	0	1	2	Yes	No	No
17796	2	4	64742-94-5	Heavy aromatic naphtha (petrol)	0	0	2	Yes	No	No
17796	2	4	64742-95-6	Volatile Petroleum Distillate	0	0	2	Yes	No	No
17796	2	4	64742-96-7	Hydrocarbon solvent	26	26	2	Yes	No	No
17796	2	4	67-56-1	Methyl alcohol (Methanol)	32	26	2	Yes	Yes	Yes
17796	2	4	67-63-0	Isopropyl alcohol (Isopropanol)	187	4	2	Yes	Yes	No
17796	2	4	67-64-1	Acetone	86	184	2	No	No	No
17796	2	4	68476-85-7	Liquified petroleum gas	3	1	2	Yes	No	No
17796	2	4	68476-86-8	Propane/isobutane(1)	0	0	2	Yes	No	No
17796	2	4	68515-48-0	Diisononyl phthalate	0	0	2	Yes	No	No
17796	2	4	68783-36-8	Fatty acids, C16-22, lithium salts	0	0		Yes	No	No
17796	2	4	70131-67-8	Polydimethylsiloxane	0	0		Yes	No	No
17796	2	4	70592-78-8	Petroleum oil (severely hydrated)	0	0	2	Yes	No	No
17796	2	4	7085-85-0	Ethyl cyanoacrylate	0	0		Yes	No	No
17796	2	4	71-36-3	n-Butyl alcohol	0	0	2	Yes	No	No
17796	2	4	71-55-6	1,1,1-Trichloroethane (Methyl chloroform)	0	0	2	No	Yes	Yes
17796	2	4	74-98-6	Propane	28	62	2	Yes	No	No
17796	2	4	7429-90-5	Aluminum (alkyls and soluble salts)	0	0	2	No	No	No
17796	2	4	7439-96-5	Manganese and compounds	0	0	2	No	No	Yes
17796	2	4	7440-50-8	Copper (dust, mist and fumes)	0	0		No	No	No
17796	2	4	75-08-1	Ethyl mercaptan	0	0		Yes	No	No
17796	2	4	75-09-2	Dichloromethane (Methylene chloride)	0	0	2	No	Yes	Yes
17796	2	4	75-28-5	2-Methyl propane (isobutane)	0	0	2	Yes	No	No
17796	2	4	75-45-6	Chlorodifluoromethane (Freon 22 propellant)	0	0	2	No	Yes	No
17796	2	4	75-52-5	Nitromethane	0	0	2	Yes	No	No
17796	2	4	75-65-0	tert-Butyl alcohol	0	0	2	Yes	No	No
17796	2	4	75-71-8	Dichlorodifluoromethane	0	0	2	No	No	No
17796	2	4	763-69-9	3-Ethyl ethoxypropionate	0	0	2	Yes	No	No
17796	2	4	7647-01-0	Hydrochloric acid (Hydrogen chloride)	0	0		No	Yes	Yes
17796	2	4	7664-41-7	Ammonia (NH3)	0	0	2	No	Yes	No
17796	2	4	7664-93-9	Sulfuric acid	0	0		No	Yes	No
17796	2	4	7782-42-5	Graphite powder	0	0		No	No	No
17796	2	4	78-93-3	2-Butanone (MEK; Methyl ethyl ketone)	18	18	2	Yes	Yes	No
17796	2	4	79-10-7	Acrylic acid	0	0		Yes	Yes	Yes
17796	2	4	79-20-9	Methyl acetate	0	0	2	No	No	No
17796	2	4	80-15-9	Cumene hydroperoxide	0	0		Yes	No	No
17796	2	4	8008-20-6	Kerosene	0	0	2	Yes	No	No
17796	2	4	8009-03-8	Petrolatum	0	0	2	Yes	No	No
17796	2	4	8012-95-1	Paraffin oil (Oil mist, mineral)	0	1	2	Yes	No	No
17796	2	4	8032-32-4	VM & P Naphtha	3	3	2	Yes	No	No
17796	2	4	8042-47-5	White Mineral Oil	0	0	2	Yes	No	No
17796	2	4	8052-41-3	Stoddard solvent	37	12	2	Yes	No	No
17796	2	4	8052-42-4	Asphalt (petroleum) fumes	0	0	2	Yes	No	No
17796	2	4	872-50-4	Amide, Cyclic	0	0	2	Yes	No	No
17796	2	4	89415-87-2	Ethyl-5-methylhydantoin,1,2-DI-CI-4	0	0		Yes	No	No
17796	2	4	9002-84-0	Polytetrafluoroethylene	0	0	2	Yes	No	No
17796	2	4	9002-88-4	Ethene, homopolymer	0	0	2	Yes	No	No
17796	2	4	9003-17-2	Butadiene Polymer	0	0	2	Yes	No	No
17796	2	4	9004-36-8	Cellulose acetate butyrate	0	0	2	Yes	No	No
17796	2	4	91-20-3	Naphthalene	0	0	2	Yes	Yes	Yes
17796	2	4	92-84-2	Phenothiazine	0	0	2	Yes	No	No
17796	2	4	95-63-6	1,2,4-Trimethyl benzene	0	0	2	Yes	Yes	No
17796	2	4	98-82-8	Cumene (Isopropylbenzene)	0	0	2	Yes	Yes	Yes
17796	2	4	GLYET	Glycol ethers	0	0	2	Yes	No	Yes

2021 Emissions Summary by Categories				
	VOCs	HAPs	TACs	NRs
Cleaners	39,969.08	1,032.84	100,196.94	71,624.90
Primers	347.32	42.30	529.27	234.32
Topcoats	119,102.74	590.76	106,495.26	3,437.25
Other	1,206.61	89.56	557.99	85.67
Subtotals	160,625.75			
Combustion	294.00			
Total:	160,919.75	Pounds		

2021 Purchase Summary by Categories (Gallons)	
Cleaners	18,378.01
Primers	149.97
Topcoats	38,616.26
Other	387,241.38
Total:	444,385.62

2021 Natural Gas Combustion

Total Usage =	**53,431,700**	cu. ft.
	585,654	therms

Assumptions:

35% of gas combusted in Units 10 - 100 mmBTU/Hr
65% of gas combusted in Units < 10 mmBTU/Hr

Emission Factors from AP-42 Volume I Chapter 1.4 Natural Gas Combustion

Per AP-42, Nat gas combustion results in very fine particulates, with all particles assumed to be less than 1.0 micron in diameter. PM1 = PM2.5 = PM10.

Emission Factors for Units 10 - 100 mmBTU/Hr from AP-42

53,431,700	x 35% =		18.70	MMCuFt
585,654	x 35% =		204.98	1000 therms

CO:	84 lbs CO		/MMCuFt =		1571	lbs. CO
NOx:	100.0 lbs NOx		/MMCuFt =		1870	lbs. NOx
VOCs:	5.5 lbs VOCs		/MMCuFt =		103	lbs VOCs
PM_{10}:	7.6 lbs PM_{10}		/MMCuFt =		142	lbs PM_{10}
$PM_{2.5}$:	7.6 lbs PM_{10}		/MMCuFt =		142	lbs $PM_{2.5}$
SOx:	0.6 lbs SOx		/MMCuFt =		11	lbs SOx

Emission Factors for Units <10 mmBTU/Hr from AP-42

53,431,700	x 65% =		34.73	MMCuFt
585,654	x 65% =		380.68	1000 therms

CO:	84 lbs CO		/MMCuFt =		2917	lbs. CO
NOx:	100.0 lbs NOx		/MMCuFt =		3473	lbs. NOx
VOCs:	5.5 lbs VOCs		/MMCuFt =		191	lbs VOCs
PM_{10}:	7.6 lbs PM_{10}		/MMCuFt =		264	lbs PM_{10}
$PM_{2.5}$:	7.6 lbs PM_{10}		/MMCuFt =		264	lbs $PM_{2.5}$
SOx:	0.6 lbs SOx		/MMCuFt =		21	lbs SOx

2021 Year End Purchase Record Report

Category	MSDS#	Product Name	Total Pounds Purchased	Total Gallons Purchased	Sum Of Purchased Quantity	Unit of Measure
Cleaner	662	Simple Green	35.26	4.12	528	Fluid Ounce(s)
Cleaner	1724	LPS Presolve (15oz)	28.13	4.18	450	Net Ounce(s)
Cleaner	1729	KW-DOMS 30/70 Solvent	1,070.22	165.00	165	Gallon(s)
Cleaner	1810	3949S Low VOC Solvent	1,188.52	144.00	144	Gallon(s)
Cleaner	2170	Contact Cleaner 2000	64.46	6.24	900	Net Ounce(s)
Cleaner	2421	TP28448 (3812) Low Hap Reducer	3,012.57	495.00	495	Gallon(s)
Cleaner	2574	3M Adhesive Remover Citrus Base, 6040 / 6041	138.75	20.99	2220	Net Ounce(s)
Cleaner	2730	KW Thinner #1	101,244.53	15,180.00	15180	Gallon(s)
Cleaner	3029	IPW-4001	15,993.70	1,760.00	1760	Gallon(s)
Cleaner	3051	Prosat #PSL70001 Pre-Saturated Wipes	10.85	1.62	1.616	Gallon(s)
Cleaner	3058	Sika Aktivator LUM	6.34	1.06	4	Liter(s)
Cleaner	3283	Gleme Glass Cleaner Aerosol	370.50	45.81	5928	Net Ounce(s)
Cleaner	3308	Isopropyl Alcohol	3,668.28	550.00	550	Gallon(s)
		Cleaner Totals:	**126,832.11**	**18,378.01**		
Other	31	242 Removable Threadlocker	30.26	3.30	422.5	Fluid Ounce(s)
Other	36	LPS #1 Greaseless Lubricant	8.25	0.99	132	Net Ounce(s)
Other	37	LPS #2 General Lubricant	33.00	3.96	528	Net Ounce(s)
Other	242	Acculube SB-12 Lubricant (solid)	65.25	9.10	1044	Net Ounce(s)
Other	252	DTE 24 Hydraulic Oil	807.02	110.00	110	Gallon(s)
Other	522	262-31 Perm.Thread Locker	0.23	0.03	3.38	Fluid Ounce(s)
Other	528	Silastic - 732 Sealant	643.79	74.25	9888	Fluid Ounce(s)
Other	530	587 Superflex Ultra-Blue Silicone	0.44	0.05	7.1	Net Ounce(s)
Other	539	P-80 Rubber Lubricant	196.09	24.00	24	Gallon(s)
Other	548	PST Pipe Sealant 567	74.28	8.25	1056.25	Fluid Ounce(s)
Other	596	Parker O-Lube (Barium)	4.17	0.50	64	Fluid Ounce(s)
Other	603	Quick Set 404	3.88	0.47	62.04	Net Ounce(s)
Other	620	3M Hi-Strength 90 Spray Adhesive	556.60	96.48	8905.6	Net Ounce(s)

2021 Year End Purchase Record Report

Category	MSDS#	Product Name	Total Pounds Purchased	Total Gallons Purchased	Sum Of Purchased Quantity	Unit of Measure
Other	662	Simple Green	17.63	2.06	264	Fluid Ounce(s)
Other	700	767 Anti-Seize	6.61	0.79	6.607	Pound(s)
Other	897	Poly. Glazing Putty #400	81.00	5.46	1296	Net Ounce(s)
Other	962	81120 5 min Epoxy	0.23	0.02	3	Fluid Ounce(s)
Other	1146	PC 0081 QDX Paint Booth Maskant	2,430.24	220.00	220	Gallon(s)
Other	1163	Rainbow Anti-Fog & Cleaner	24.00	3.00	384	Fluid Ounce(s)
Other	1321	565 PST Industrial Grade Pipe Sealant	145.25	15.84	2028	Fluid Ounce(s)
Other	1465	Prism 411 Clear Adhesive	0.88	0.10	14	Net Ounce(s)
Other	1623	Blue Layout Fluid #00603	4.50	0.74	72	Net Ounce(s)
Other	1688	Paste Cream Hardener	5.25		84	Net Ounce(s)
Other	1796	Mechanical Pump Oil #16	472.13	64.43	473.76	Fluid Ounce(s)
Other	1959	3M Finesse It	8.13	1.00	1	Gallon(s)
Other	1961	UCON Refrigeration Lubricant 6290 (SP-20 oil)	13.67	1.58	202.8	Fluid Ounce(s)
Other	2114	Duramix #4050/3M 4240 Part A	1.45	0.16	20.25	Fluid Ounce(s)
Other	2157	Master Appliance Ultratorch Butane Fuel	3.20	0.38	51.25	Net Ounce(s)
Other	2386	Peak -30 Premium Washer Fluid	52,933.28	5,720.00	5720	Gallon(s)
Other	2597	Lubriplate No 1200-2	55.00	7.01	880	Net Ounce(s)
Other	2718	Argon	415.67	49.86	415.67	Pound(s)
Other	2721	Nitrogen	791.37	94.92	791.37	Pound(s)
Other	2722	Oxygen Gas	166.26	17.97	166.26	Pound(s)
Other	2742	Robot Grease, LG-03	17.22	2.37	275.5	Net Ounce(s)
Other	2783	Valve Action Paint Marker	10.74	1.17	290.12	Fluid Ounce(s)
Other	2786	Propane - odorized	75,430.26	18,095.30	18095.3	Gallon(s)
Other	2802	248 Medium Strength Threadlocker Stick	0.73	0.08	0.08	Gallon(s)
Other	2857	KLEA 134a	234,593.94	23,064.67	42000	Pound(s)
Other	2859	Diesel Guard Low Pour - Winter	172.82	22.63	22.63	Gallon(s)
Other	2895	DELO 400 LE SAE 15W 40	5,713.35	770.00	770	Gallon(s)
Other	2910	Gasket Eliminator 518 Sealant	0.73	0.08	300	mLiter(s)

2021 Year End Purchase Record Report

Category	MSDS#	Product Name	Total Pounds Purchased	Total Gallons Purchased	Sum Of Purchased Quantity	Unit of Measure
Other	2911	266 Threadlocker High Strength	14,931.76	1,500.40	3000	mLiter(s)
Other	2943	Chevron Automatic Transmission Fluid HD-389	36,673.63	5,115.00	5115	Gallon(s)
Other	2949	Diesel Ultra LS Perm Diesel 2 (S-15ppm) Flying J	1,389,128.45	196,026.00	196026	Gallon(s)
Other	2965	Chevron Delo Extended Life Coolant / Antifreeze - Bitterant	323,227.99	34,310.00	34310	Gallon(s)
Other	2966	70-08A Black Sealant	27,460.28	2,392.00	2392	Gallon(s)
Other	2979	Hydrogen Peroxide 31%	1,008.78	110.00	110	Gallon(s)
Other	3006	Delo Grease EP NLGI 2	4,718.40	621.93	4718.4	Pound(s)
Other	3007	Chainmate Chain & Wire Rope Lubricant (Aerosol)	16.50	2.64	264	Net Ounce(s)
Other	3020	Meropa Gear Lubricant	68.26	9.20	9.2	Gallon(s)
Other	3030	POLY D-TAC SF	6,259.00	715.00	715	Gallon(s)
Other	3041	DEF - Diesel Exhaust Fluid	347,639.44	38,255.40	38255.4	Gallon(s)
Other	3056	Inkjet Ink Makeup #CLG4266	20.03	3.00	11.37	Liter(s)
Other	3060	Loctite 243 Threadlocker	2.64	0.29	1100	mLiter(s)
Other	3091	3M Perfect-It 3000 Ultrafina, #6068	13.29	1.75	1.75	Gallon(s)
Other	3107	Cal-Blue Plus Gas Leak Detector	17.01	2.00	2	Gallon(s)
Other	3112	LubeCon Series I Chain Lube	742.83	110.00	110	Gallon(s)
Other	3121	Fiber Tech Fiberglass Reinforced Filler	74.53	6.53	12	Pound(s)
Other	3159	MANUS-BOND 75-AM Hi-Perf Elastomeric Sealant	7,058.40	604.74	604.74	Gallon(s)
Other	3232	DeLO 400 XLE Synblend SAE 10W-30 Oil	292,898.32	40,382.00	40382	Gallon(s)
Other	3254	Emgard PS-386 MTF 7000 Synthetic Oil	108,586.00	15,323.05	108586	Pound(s)
Other	3413	Sioux City 288 Air Motor Oil	11.96	1.62	208	Fluid Ounce(s)
Other	3416	Cross Check Tamper Proof Torque Mark	21.19	2.49	319	Fluid Ounce(s)
Other	3457	BP-300 Black	585.59	50.17	7622	Fluid Ounce(s)

2021 Year End Purchase Record Report

Category	MSDS#	Product Name	Total Pounds Purchased	Total Gallons Purchased	Sum Of Purchased Quantity	Unit of Measure
Other	3463	Mobil Delvac 1 ATF	21,749.23	3,080.00	3080	Gallon(s)
Other	3500	Diesel Guard Supreme Plus	103.10	13.17	13.17	Gallon(s)
Other	3503	Sikaflex 250UH-1 Cool	1,100.48	110.00	110	Gallon(s)
		Totals for "Others":	**2,960,055.88**	**387,241.38**		
Primer Over 3.5 lbs/gal	1449	16A220 Black S/G Primer	4.50	0.71	72	Net Ounce(s)
Primer Under 3.5 lbs/gal	2100	1220S Urethane Primer	390.17	36.00	36	Gallon(s)
Primer Under 3.5 lbs/gal	3026	235S Metalok Pre-Treatment Primer	168.07	16.00	16	Gallon(s)
Primer Under 3.5 lbs/gal	3068	373P27680 Black Primer	90.87	10.00	10	Gallon(s)
Primer Under 3.5 lbs/gal	3255	A-4114S Sef Etching Gray Aerosol Primer	292.50	42.79	4680	Net Ounce(s)
Primer Under 3.5 lbs/gal	3507	410A 1K Primer Surfacer Light Gray	297.00	44.47	4752	Net Ounce(s)
		Totals for Primers:	**1,243.12**	**149.97**		
TopCoat	1067	8989S(VGF48138)Concentrated Accelerator	1,666.73	204.00	204	Gallon(s)
TopCoat	1264	389S Urethane Dry Accelerator	129.39	16.00	16	Gallon(s)
TopCoat	1446	31E551 Fed Yellow	4.50	0.72	72	Net Ounce(s)
TopCoat	1513	359S Anti-Cratering Additive	268.45	35.00	35	Gallon(s)
TopCoat	1672	3401S '3400-S'Uniforming Finish	58.03	8.00	8	Gallon(s)
TopCoat	1823	1001S White Pearl	1,563.19	75.00	75	Gallon(s)
TopCoat	1824	1002S Red Pearl	2,584.89	117.00	117	Gallon(s)
TopCoat	1826	1004S Blue Pearl	1,190.52	56.00	56	Gallon(s)
TopCoat	1827	1005S Gold Pearl	500.22	24.00	24	Gallon(s)
TopCoat	1828	1006S Copper Pearl	541.91	25.00	25	Gallon(s)
TopCoat	1829	1007S Violet Pearl	106.30	5.00	5	Gallon(s)
TopCoat	1831	1009S Super Green Pearl	107.96	5.00	5	Gallon(s)
TopCoat	1832	1010S Red Satin Pearl	67.78	3.00	3	Gallon(s)
TopCoat	2257	1014S Rutile Red Pearl - Nondusting	62.78	3.00	3	Gallon(s)

2021 Year End Purchase Record Report

Category	MSDS#	Product Name	Total Pounds Purchased	Total Gallons Purchased	Sum Of Purchased Quantity	Unit of Measure
TopCoat	2634	PT101 White Tint PT101	6,354.46	412.00	412	Gallon(s)
TopCoat	2635	PT105 High Strength Black	6,231.07	740.00	740	Gallon(s)
TopCoat	2636	PT107 Low Strength Black Tint	424.85	52.00	52	Gallon(s)
TopCoat	2637	PT110 Medium Fine Aluminum Tint	1,484.65	168.00	168	Gallon(s)
TopCoat	2638	PT114 Coarse Aluminum High Solids Tint	3,416.84	376.00	376	Gallon(s)
TopCoat	2639	PT120 Blue Shade Violet Tint	700.31	84.00	84	Gallon(s)
TopCoat	2640	PT122 Indo Blue Tint	612.27	72.00	72	Gallon(s)
TopCoat	2641	PT124 Red Shade Blue HS Tint	2,531.78	292.00	292	Gallon(s)
TopCoat	2644	PT127 Green Shade Blue Tint, HS	749.33	84.00	84	Gallon(s)
TopCoat	2645	PT132 Blue Shade Green	2,228.31	257.00	257	Gallon(s)
TopCoat	2646	PT133 Blue Shade Green LS Tint	98.04	12.00	12	Gallon(s)
TopCoat	2649	PT140 Green Shade Yellow Tint	1,467.31	100.00	100	Gallon(s)
TopCoat	2650	PT144 Yellow Tint	1,090.48	120.00	120	Gallon(s)
TopCoat	2651	PT148 Red Shade Yellow Tint	1,090.48	120.00	120	Gallon(s)
TopCoat	2653	PT162 Transparent Red Tint	408.18	48.00	48	Gallon(s)
TopCoat	2654	PT164 Magenta Tint	1,499.99	173.00	173	Gallon(s)
TopCoat	2655	PT165 Opaque Red Tint	5,288.83	582.00	582	Gallon(s)
TopCoat	2656	PT166 Opaque Blue Shade Red Tint	166.32	19.00	19	Gallon(s)
TopCoat	2657	PT167 Violet High Solids Tint	1,133.50	132.00	132	Gallon(s)
TopCoat	2661	PT181 Yellow Oxide Tint	300.13	24.00	24	Gallon(s)
TopCoat	2662	PT183 Transparent Yellow Oxide Tint	812.36	84.00	84	Gallon(s)
TopCoat	2663	PT185 Red Oxide Tint	53.02	4.00	4	Gallon(s)
TopCoat	2664	PT187 Transparent Red Oxide Tint	942.08	100.00	100	Gallon(s)
TopCoat	2667	PT198 Binder	2,778.72	330.00	330	Gallon(s)
TopCoat	2668	PT199 Balancer	11,912.57	1,348.00	1348	Gallon(s)
TopCoat	2669	PT190 Additive for Metallics	323.48	40.00	40	Gallon(s)
TopCoat	2670	PT195 Additive for Solids	385.84	52.00	52	Gallon(s)
TopCoat	2671	7285s Reducer for Single Stage	5,186.03	715.00	715	Gallon(s)
TopCoat	2683	PT154 Orange Tint	1,771.11	188.00	188	Gallon(s)

2021 Year End Purchase Record Report

Category	MSDS#	Product Name	Total Pounds Purchased	Total Gallons Purchased	Sum Of Purchased Quantity	Unit of Measure
TopCoat	2693	8840S Imron Elite Clearcoat 8840s RKP31033	480.21	60.00	60	Gallon(s)
TopCoat	2729	PT112 Fine Bright Aluminum Tint	327.14	36.00	36	Gallon(s)
TopCoat	2752	PT196 Flattener for NGT M/M Line PT 196	141.40	16.00	16	Gallon(s)
TopCoat	2909	Gloss Trim Black 402-01	11.25	1.80	180	Net Ounce(s)
TopCoat	2921	VGF31588 NGT Anticratering Additive	849.71	112.00	112	Gallon(s)
TopCoat	3000	6210E Upgraded Productive Chassis Binder	10,004.40	1,250.00	1250	Gallon(s)
TopCoat	3069	STRUST SSPR 6PK Gloss Black Spray Paint	4,647.62	725.87	82620	Net Ounce(s)
TopCoat	3084	1021S Gold Xirallic Flake	72.28	3.00	3	Gallon(s)
TopCoat	3092	STRUST SSPR 6PK Gloss Sunrise Red Spray Paint	40.50	6.44	648	Net Ounce(s)
TopCoat	3118	1020S Crystal Silver Xirallic Flake	1,046.71	45.00	45	Gallon(s)
TopCoat	3120	PT116 Extra Coarse Aluminum Tint	90.04	10.00	10	Gallon(s)
TopCoat	3125	1023S Radiant Red Xirallic Flake	1,325.17	55.00	55	Gallon(s)
TopCoat	3138	1051S Silver Flake Tint	471.96	51.00	51	Gallon(s)
TopCoat	3139	1052S Silver-Red Pearl	70.03	3.00	3	Gallon(s)
TopCoat	3141	1054S Green-Gold Pearl	315.14	14.00	14	Gallon(s)
TopCoat	3142	1055S Blue Pearl	116.38	4.00	4	Gallon(s)
TopCoat	3143	1056S Red-Blue Pearl	22.51	1.00	1	Gallon(s)
TopCoat	3144	1057S Brass Pearl	261.78	10.00	10	Gallon(s)
TopCoat	3175	PT169 Deep Maroon Tint NGT Plus	2,355.04	264.00	264	Gallon(s)
TopCoat	3186	FG-0294 Productive BC/CC Activator	75,224.92	8,278.00	8278	Gallon(s)
TopCoat	3204	1025S Green Xirallic Flake	22.51	1.00	1	Gallon(s)
TopCoat	3226	528-31210 Mobius N0001EH Chassis Paint	36,015.84	4,500.00	4500	Gallon(s)
TopCoat	3237	PT298 SCA Binder for Basecoat, EY Low-Bake Trial	6,701.95	812.00	812	Gallon(s)

2021 Year End Purchase Record Report

Category	MSDS#	Product Name	Total Pounds Purchased	Total Gallons Purchased	Sum Of Purchased Quantity	Unit of Measure
TopCoat	3238	8875S Reducer for Basecoat, EY Low-Bake Trial	8,399.19	1,158.00	1158	Gallon(s)
TopCoat	3242	1601 Krylon Gloss Black Aerosol Paint	9.00	1.44	144	Net Ounce(s)
TopCoat	3263	8890S High Solids Productive Clearcoat, EY low bake	53,811.67	5,712.00	5712	Gallon(s)
TopCoat	3280	1960-70006 L0006 EY White Factory Pack Paint	12,335.43	1,080.00	1080	Gallon(s)
TopCoat	3281	1960-70225 L0225 EY White Factory Pack Paint	3,968.41	350.00	350	Gallon(s)
TopCoat	3396	1024S Galaxy Blue Xirallic Flake Pearl	360.16	16.00	16	Gallon(s)
TopCoat	3425	Chassis Black 1820-10001 N0001EA	36,766.17	4,500.00	4500	Gallon(s)
TopCoat	3437	RK-40315 High Solids Productive Clearcoat	48.02	6.00	6	Gallon(s)
TopCoat	3451	8800E Basecoat Binder	17,831.84	2,228.00	2228	Gallon(s)
TopCoat	3472	1A64E100 White - Acrylic Enamel	6.75	0.99	108	Net Ounce(s)
		Totals for Topcoats:	**344,446.12**	**38,616.26**		

2021 Year End Report - SUM of CAS Pounds

Category Name	CAS#	Chemical Name	Sum Of HAPs	Sum Of TACs	Sum Of VOCs	Sum Of NRs
Cleaner	37	Other (Nonhazardous)	0.00	0.00	0.00	0.00
Cleaner	64175	Ethyl alcohol (Ethanol)	0.00	4,661.36	4,661.36	0.00
Cleaner	67630	Isopropyl alcohol (Isopropanol)	0.00	3,881.82	3,881.82	0.00
Cleaner	67641	Acetone	0.00	71,566.89	0.00	71,566.89
Cleaner	74986	Propane	0.00	0.00	25.95	0.00
Cleaner	75285	2-Methyl propane (isobutane)	0.00	0.00	0.42	0.00
Cleaner	106978	Butane	0.00	5.56	5.56	0.00
Cleaner	108872	Methylcyclohexane	0.00	60.25	60.25	0.00
Cleaner	108883	Toluene	1,032.84	1,032.84	1,032.84	0.00
Cleaner	111762	2-Butoxyethanol (Butyl cellosolve; Ethylene glycol monobutyl ether)	0.00	13.32	13.32	0.00
Cleaner	123864	n-Butyl acetate	0.00	271.13	271.13	0.00
Cleaner	124389	Carbon Dioxide	0.00	0.00	0.00	0.00
Cleaner	141786	Ethyl Acetate	0.00	15,492.53	15,492.53	0.00
Cleaner	142825	Heptane (n-Heptane)	0.00	3,211.24	3,211.24	0.00
Cleaner	526954	Gluconic acid	0.00	0.00	799.69	0.00
Cleaner	1717006	Dichlorofluoroethane (HCFC-141b)	0.00	0.00	0.00	58.01
Cleaner	5989275	D-Limonene	0.00	0.00	16.59	0.00
Cleaner	7732185	Water	0.00	0.00	0.00	0.00
Cleaner	8028486	Citrus Extract	0.00	0.00	0.00	0.00
Cleaner	8052413	Stoddard Solvent	0.00	0.00	10.97	0.00
Cleaner	64741657	Naphtha (petroleum) heavy alkylated (isopar)	0.00	0.00	1,070.22	0.00
Cleaner	64742478	Petroleum distillate, hydrotreated light	0.00	0.00	59.43	0.00
Cleaner	64742898	Petroleum naphtha, paraffins & naphthenes	0.00	0.00	9,355.77	0.00
		Cleaner Totals:	**1,032.84**	**100,196.94**	**39,969.08**	**71,624.90**
Other	2	Additives	0.00	0.00	0.00	0.00
Other	23	Highly Refined Mineral Oil	0.00	0.00	0.00	0.00
Other	31	Non Hazardous	0.00	0.00	0.00	0.00
Other	37	Other (Nonhazardous)	0.00	0.00	0.00	0.00
Other	38	Paraffinic hydrocarbons	0.00	0.00	0.00	0.00
Other	44	Polyalkylene Glycol	0.00	0.00	0.00	0.00
Other	45	Polyester Resin	0.00	0.00	0.00	0.00
Other	51	Polyurethane Methacrylate	0.00	0.00	0.00	0.00
Other	64	Trade Secret	0.00	0.00	0.00	0.00
Other	128	Multipurpose Gear Oil Additive	0.00	0.00	0.00	0.00
Other	173	Heavy Refined Mineral Oil (C15-C50)	0.00	0.00	0.00	0.00

2021 Year End Report - SUM of CAS Pounds

Category Name	CAS#	Chemical Name	Sum Of HAPs	Sum Of TACs	Sum Of VOCs	Sum Of NRs
Other	181	Base Oil	0.00	0.00	0.00	0.00
Other	50000	Formaldehyde	0.00	0.00	0.00	0.00
Other	56815	Glycerol	0.00	0.00	0.41	0.00
Other	57114	Stearic Acid	0.00	0.00	0.00	0.00
Other	57136	Urea	0.00	0.00	0.00	0.00
Other	57556	Propylene Glycol	0.00	0.00	0.00	0.00
Other	67561	Methyl alcohol (Methanol)	32.33	32.33	32.33	0.00
Other	67630	Isopropyl alcohol (Isopropanol)	0.00	186.60	186.60	0.00
Other	67641	Acetone	0.00	85.67	0.00	85.67
Other	71363	N-Butyl Alcohol	0.00	0.05	0.05	0.00
Other	74840	Ethane	0.00	0.00	0.00	0.00
Other	74986	Propane	0.00	0.00	28.38	0.00
Other	75285	2-Methyl propane (isobutane)	0.00	0.00	0.00	0.00
Other	75832	2,2-Dimethylbutane	0.00	0.00	0.00	0.00
Other	78933	2-Butanone (MEK; Methyl ethyl ketone)	0.00	18.32	18.32	0.00
Other	79107	Acrylic Acid	0.01	0.01	0.01	0.00
Other	79298	2,3-Dimethyl Butane	0.00	0.00	0.00	0.00
Other	80159	Cumene Hydroperoxide	0.00	0.00	0.00	0.00
Other	81072	Saccharin	0.00	0.00	0.00	0.00
Other	85449	Phthalic Anhydride	0.00	0.00	0.00	0.00
Other	90302	1-Naphthalenamine, N-phenyl-	0.00	0.00	0.00	0.00
Other	91203	Naphthalene	0.00	0.00	0.00	0.00
Other	94360	Benzoyl Peroxide	0.00	0.00	0.00	0.00
Other	95636	1,2,4-Trimethyl Benzene	0.00	0.00	0.00	0.00
Other	96140	3-MethylPentane	0.00	0.00	1.24	0.00
Other	96297	Methyl Ethyl Ketoxime	0.00	0.00	0.00	0.00
Other	98828	Cumene (Isopropylbenzene)	0.00	0.00	0.00	0.00
Other	100414	Ethylbenzene	0.12	0.12	0.12	0.00
Other	100425	Styrene	20.69	20.69	20.69	0.00
Other	101371	2,4,6-Triallyloxy-1,3,5-triazine	0.00	0.00	0.00	0.00
Other	101688	Methylene diphenyl diisocyanate	1.38	1.38	1.38	0.00
Other	106978	Butane	0.00	0.53	0.53	0.00
Other	107211	Ethylene Glycol	33.31	33.31	33.31	0.00
Other	107835	2-MethylPentane	0.00	0.00	2.48	0.00
Other	108656	Methyloxy-2-propanol acetate	0.00	0.00	0.08	0.00
Other	108883	Toluene	0.32	0.32	0.32	0.00
Other	109660	Pentane	0.00	83.49	83.49	0.00
Other	110543	Hexane (n-Hexane)	0.25	0.25	0.25	0.00

2021 Year End Report - SUM of CAS Pounds

Category Name	CAS#	Chemical Name	Sum Of HAPs	Sum Of TACs	Sum Of VOCs	Sum Of NRs
Other	110827	Cyclohexane	0.00	83.49	83.49	0.00
Other	111762	2-Butoxyethanol (Butyl cellosolve; Ethylene glycol monobutyl ether)	0.00	0.18	0.18	0.00
Other	112538	1-Dodecanol	0.00	0.00	0.00	0.00
Other	114830	1-Acetyl-2-Phenyl Hydrazine	0.00	0.00	0.00	0.00
Other	115071	Propylene	0.00	0.00	0.00	0.00
Other	115106	Dimethyl Ether Propellant	0.00	0.00	194.81	0.00
Other	123262	N,N'-Ethane-1,2-diylbis(12-hydroxyoctadecan-1-amide)	0.00	0.00	0.00	0.00
Other	123319	Hydroquinone	0.02	0.02	0.02	0.00
Other	123422	Diacetone Alcohol	0.00	0.81	0.81	0.00
Other	123864	n-Butyl acetate	0.00	1.80	1.80	0.00
Other	124389	Carbon Dioxide	0.00	0.00	0.00	0.00
Other	128392	2,6-di-tert-butyl phenol	0.00	0.00	0.00	0.00
Other	136232	Butyl zimate	0.00	0.00	0.00	0.00
Other	143282	cis-9-Octadecen-1-ol	0.00	0.00	0.00	0.00
Other	151213	Duponol WAQ	0.00	0.00	0.00	0.00
Other	471341	Calcium Carbonate	0.00	0.00	0.00	0.00
Other	540976	Dodecamethylcyclohexasiloxane	0.00	0.00	0.00	0.00
Other	546930	Magnesite	0.00	0.00	0.00	0.00
Other	613489	N,N-Dialkyltoluidines	0.00	0.00	0.00	0.00
Other	750801	Ethyl Mercaptan	0.00	0.00	0.00	0.00
Other	811972	Tetrafluoroethane (HFC-134a)	0.00	0.00	0.00	0.00
Other	1305788	Calcium oxide	0.00	0.00	0.00	0.00
Other	1314132	Zinc oxide, fumes	0.00	0.00	0.00	0.00
Other	1317653	Calcium Carbonate	0.00	0.00	0.00	0.00
Other	1330207	Xylenes	1.14	1.14	1.14	0.00
Other	1332587	Clay, pumice	0.00	0.00	0.00	0.00
Other	1333864	Carbon Black	0.00	0.00	0.00	0.00
Other	1344281	Aluminum Oxide	0.00	0.00	0.00	0.00
Other	1760243	Amino propyl trimethoxysilane	0.00	0.00	274.60	0.00
Other	2082817	Tetramethylene dimethacrylate	0.00	0.00	0.00	0.00
Other	2224331	Vinyl Oximinosilane	0.00	0.00	0.00	0.00
Other	2768027	Silane, Ethenyltrimethoxy	0.00	0.00	0.00	0.00
Other	3006937	Maleimide Resin	0.00	0.00	0.00	0.00
Other	4098719	Isophorone diisocyanate	0.00	1.38	1.38	0.00
Other	5280660	CI Pigment 15865	0.00	0.00	0.00	0.00
Other	7085850	Ethyl Cyanoacrylate	0.00	0.00	0.00	0.00
Other	7429905	Aluminum / Aluminum Pigment	0.00	0.00	0.00	0.00

2021 Year End Report - SUM of CAS Pounds

Category Name	CAS#	Chemical Name	Sum Of HAPs	Sum Of TACs	Sum Of VOCs	Sum Of NRs
Other	7439965	Manganese and compounds	0.00	0.00	0.00	0.00
Other	7440371	Argon	0.00	0.00	0.00	0.00
Other	7440473	Chromium and compounds	0.00	0.00	0.00	0.00
Other	7440508	Copper	0.00	0.00	0.00	0.00
Other	7440666	Zinc	0.00	0.00	0.00	0.00
Other	7620771	Lithium-Soap Thickener	0.00	0.00	0.00	0.00
Other	7631869	Silica (amorphous)	0.00	0.00	0.00	0.00
Other	7647010	Hydrochloric acid (Hydrogen chloride)	0.00	0.00	0.00	0.00
Other	7722841	Hydrogen Peroxide	0.00	0.00	0.00	0.00
Other	7727379	Nitrogen	0.00	0.00	0.00	0.00
Other	7732185	Water	0.00	0.00	0.00	0.00
Other	7782425	Graphite	0.00	0.00	0.00	0.00
Other	7782447	Oxygen	0.00	0.00	0.00	0.00
Other	8032324	VM&P Naptha	0.00	3.22	3.22	0.00
Other	8042475	White Mineral Oil	0.00	0.00	0.24	0.00
Other	8052413	Stoddard Solvent	0.00	0.00	36.71	0.00
Other	8052480	sodium tallowate	0.00	0.00	0.00	0.00
Other	9002840	Polytetrafluoroethylene	0.00	0.00	0.00	0.00
Other	9002884	Ethene, homopolymer	0.00	0.00	0.02	0.00
Other	9003296	Polybutene	0.00	0.00	0.00	0.00
Other	9004368	Cellulose acetate butyrate	0.00	0.00	0.00	0.00
Other	9004700	Nitrocellulose	0.00	0.00	0.00	0.00
Other	9004813	Polyglycol Laurate	0.00	0.00	0.00	0.00
Other	9004960	Polyglycol Oleates	0.00	0.00	0.00	0.00
Other	9011147	Poly(Methyl Methacrylate)	0.00	0.00	0.00	0.00
Other	10294561	Phosphorous acid	0.00	0.00	0.00	0.00
Other	10605217	carbendazim	0.00	0.00	0.00	0.00
Other	13463677	Titanium Dioxide	0.00	0.00	0.00	0.00
Other	14807966	Talc	0.00	0.00	0.00	0.00
Other	15874483	Antimony 0,0-dipropylphosphorodithionate	0.00	0.00	0.00	0.00
Other	19766893	Sodium 2-Ethylhexanoate	0.00	0.00	0.00	0.00
Other	21645512	Aluminum hydroxide	0.00	0.00	0.00	0.00
Other	22673194	Tin, dibutylbis(2,4-pentanedionato-O,O')-, (OC-6-11)-	0.00	0.00	0.00	0.00
Other	22984549	Methyl oximinosilane	0.00	0.00	0.00	0.00
Other	24448202	Ethoxylated bisphenol dimethylacrylate(1)	0.00	0.00	149.32	0.00
Other	25068386	Epoxy Resin	0.00	0.00	0.00	0.00
Other	25686286	4,4'-Diisocyanatodiphenylmethane polymer	0.00	0.00	0.00	0.00
Other	25852475	Polyglycol Dimethacrylate	0.00	0.00	0.00	0.00

2021 Year End Report - SUM of CAS Pounds

Category Name	CAS#	Chemical Name	Sum Of HAPs	Sum Of TACs	Sum Of VOCs	Sum Of NRs
Other	27247967	2-Ethylhexyl Nitrate	0.00	0.00	0.00	0.00
Other	27813021	Hydroxylalkyl Methacrylate	0.00	0.00	0.00	0.00
Other	36653824	Cetyl Alcohol	0.00	0.00	0.00	0.00
Other	39382257	Bisphenol A Fumarate Resin	0.00	0.00	0.00	0.00
Other	59675671	Polymer with Oxirane	0.00	0.00	0.00	0.00
Other	61789864	Calcium Sulfonate	0.00	0.00	0.00	0.00
Other	61791444	Ethanol, 2,2'-iminobis-, N-tallow alkyl derivs.	0.00	0.00	0.00	0.00
Other	64741442	Mineral seal oil	0.00	0.00	0.00	0.00
Other	64741884	Paraffinic distillate, solvent refined	0.00	0.00	0.40	0.00
Other	64741895	Petroleum Distillates	0.00	0.00	0.00	0.00
Other	64742014	Residual oils (petroleum) solvent refined	0.00	0.00	0.00	0.00
Other	64742149	Light Distillate	0.00	0.00	0.00	0.00
Other	64742309	Petroleum distillates	0.00	0.00	0.00	0.00
Other	64742467	Petroleum distillates	0.00	0.00	0.00	0.00
Other	64742478	Petroleum distillate, hydrotreated light	0.00	0.00	3.29	0.00
Other	64742489	Petroleum distillate, hydrotreated light	0.00	0.00	0.81	0.00
Other	64742525	Hydrotreated light petroleum distillate	0.00	0.00	0.00	0.00
Other	64742536	Napthenic distillate	0.00	0.00	0.00	0.00
Other	64742547	Distillates (petroleum) hydrofvld	0.00	0.00	0.00	0.00
Other	64742627	Solvent-Dewaxed Residual Oil	0.00	0.00	0.00	0.00
Other	64742887	Mineral spirits	0.00	0.00	15.72	0.00
Other	64742945	Heavy aromatic naphtha (petrol)	0.00	0.00	0.00	0.00
Other	64742956	Volatile Petroleum Distillate	0.00	0.00	0.00	0.00
Other	64742967	Hydrocarbon solvent	0.00	0.00	25.78	0.00
Other	65997173	Sodium Calcium Magnesium Silicate	0.00	0.00	0.00	0.00
Other	68037014	Synthetic Hydrocarbon Base Oil	0.00	0.00	0.00	0.00
Other	68201194	Barium Soap	0.00	0.00	0.00	0.00
Other	68332627	Polymeric Plasticizer	0.00	0.00	0.00	0.00
Other	68424099	Diphenylmethanediisocyanate Prepolymer Solution	0.00	0.00	0.00	0.00
Other	68476857	Liquified Petroleum Gas	0.00	2.89	2.89	0.00
Other	68611449	Colloidal Silica	0.00	0.00	0.00	0.00
Other	68649423	Zinc Alkyl Dithiophosphate	0.00	0.00	0.00	0.00
Other	68909206	Trimethylated silica	0.00	0.00	0.00	0.00
Other	70131678	Polydimethylsiloxane	0.00	0.00	0.00	0.00

2021 Year End Report - SUM of CAS Pounds

Category Name	CAS#	Chemical Name	Sum Of HAPs	Sum Of TACs	Sum Of VOCs	Sum Of NRs
Other	71701127	Chromate(1-), [N-[7-hydroxy-8-[(2-hydroxy-5-nitrophenyl)azo]-1-naphthalenyl]acetamidato(2-)][1-[(2-hydroxy-5-nitrophenyl)azo]-2-naphthalenolato(2-)]-, hydrogen, compd. with N-cyclohexylcyclohexanamine (1:1)	0.00	0.00	0.00	0.00
Other	71839902	Chromate(1-), bisN-7-hydroxy-8-(2-hydroxy-5-nitrophenyl)azo-1-naphthalenylacetamidato(2-)-, hydrogen, compd. with N-cyclohexylcyclohexanamine (1:1)	0.00	0.00	0.00	0.00
Other	74421719	Chromate(1-), bis1-2-(hydroxy-.kappa.O)-5-nitrophenylazo-.kappa.N1-2-naphthalenolato(2-)-.kappa.O-, hydrogen, compd. with N-cyclohexylcyclohexanamine (1:1)	0.00	0.00	0.00	0.00
Other	80939624	Amines, C11-14-branched alkyl, monohexyl and dihexyl phosphates	0.00	0.00	0.00	0.00
Other	94108971	2-[[2,2-bis[[(1-oxoallyl)oxy]methyl]butoxy]methyl]-2-ethyl-1,3-propanediyl diacrylate	0.00	0.00	0.00	0.00
Other	112926008	Silica, Amorphous	0.00	0.00	0.00	0.00
Other	112945525	Silica, Amorphous	0.00	0.00	0.00	0.00
Other	121158585	Phenol, dodecyl-, branched	0.00	0.00	0.00	0.00
Other	193486907	Sisesquioxanes ,3-[(2-methyl-1-oxo-2propenyl)oxy]propyl Ph, Polymers with silicic acid tetra-Et ester	0.00	0.00	0.00	0.00
		Totals for "Others":	**89.56**	**557.99**	**1,206.61**	**85.67**
Primer Under 3.5 lbs/gal	0	Epoxy Urethane Resin	0.00	0.00	0.00	0.00
Primer Under 3.5 lbs/gal	1	Acrylic Polymer	0.00	0.00	0.00	0.00
Primer Under 3.5 lbs/gal	45	Polyester Resin	0.00	0.00	0.00	0.00
Primer Under 3.5 lbs/gal	72	Zinc Molybdate & Zinc Oxide	0.00	0.00	0.00	0.00
Primer Over 3.5 lbs/gal	67641	Acetone	0.00	1.21	0.00	1.21
Primer Under 3.5 lbs/gal	67641	Acetone	0.00	233.11	0.00	233.11
Primer Under 3.5 lbs/gal	71238	n-Propyl alcohol	0.00	35.03	35.03	0.00
Primer Over 3.5 lbs/gal	71363	N-Butyl Alcohol	0.00	0.11	0.11	0.00
Primer Under 3.5 lbs/gal	71363	N-Butyl Alcohol	0.00	26.33	26.33	0.00
Primer Over 3.5 lbs/gal	74986	Propane	0.00	0.00	0.49	0.00
Primer Over 3.5 lbs/gal	75285	2-Methyl propane (isobutane)	0.00	0.00	0.27	0.00
Primer Under 3.5 lbs/gal	78831	Isobutyl Alcohol	0.00	19.77	19.77	0.00

2021 Year End Report - SUM of CAS Pounds

Category Name	CAS#	Chemical Name	Sum Of HAPs	Sum Of TACs	Sum Of VOCs	Sum Of NRs
Primer Under 3.5 lbs/gal	78933	2-Butanone (MEK; Methyl ethyl ketone)	0.00	36.99	36.99	0.00
Primer Under 3.5 lbs/gal	79209	Methyl Acetate	0.00	23.40	0.00	0.00
Primer Under 3.5 lbs/gal	91203	Naphthalene	0.15	0.15	0.15	0.00
Primer Over 3.5 lbs/gal	100414	Ethylbenzene	0.11	0.11	0.11	0.00
Primer Under 3.5 lbs/gal	100414	Ethylbenzene	1.91	1.91	1.91	0.00
Primer Under 3.5 lbs/gal	103093	2-Ethylhexyl Acetate	0.00	0.00	1.91	0.00
Primer Over 3.5 lbs/gal	106978	Butane	0.00	0.49	0.49	0.00
Primer Under 3.5 lbs/gal	108101	Methyl isobutyl ketone (MIBK; Hexone)	8.63	8.63	8.63	0.00
Primer Under 3.5 lbs/gal	108656	Methyloxy-2-propanol acetate	0.00	0.00	38.58	0.00
Primer Over 3.5 lbs/gal	108883	Toluene	0.49	0.49	0.49	0.00
Primer Under 3.5 lbs/gal	108883	Toluene	2.86	2.86	2.86	0.00
Primer Under 3.5 lbs/gal	110123	Methyl isoamyl ketone	0.00	2.83	2.83	0.00
Primer Under 3.5 lbs/gal	110430	Methyl n-amyl ketone	0.00	37.11	37.11	0.00
Primer Under 3.5 lbs/gal	112072	2-Butoxy Ethyl Acetate	19.73	0.00	19.73	0.00
Primer Under 3.5 lbs/gal	112345	Diethylene glycol monbutyl ether	1.53	0.00	1.53	0.00
Primer Under 3.5 lbs/gal	123864	n-Butyl acetate	0.00	26.33	26.33	0.00
Primer Under 3.5 lbs/gal	141786	Ethyl Acetate	0.00	42.12	42.12	0.00
Primer Under 3.5 lbs/gal	471341	Calcium Carbonate	0.00	0.00	0.00	0.00
Primer Under 3.5 lbs/gal	1314132	Zinc oxide, fumes	0.00	0.00	0.00	0.00
Primer Over 3.5 lbs/gal	1330207	Xylenes	0.27	0.27	0.27	0.00
Primer Under 3.5 lbs/gal	1330207	Xylenes	6.62	6.62	6.62	0.00
Primer Under 3.5 lbs/gal	1332587	Clay, pumice	0.00	0.00	0.00	0.00
Primer Under 3.5 lbs/gal	1333864	Carbon Black	0.00	0.00	0.00	0.00
Primer Under 3.5 lbs/gal	1879090	Topanol A	0.00	0.00	0.00	0.00
Primer Under 3.5 lbs/gal	7631869	Silica (amorphous)	0.00	0.00	0.00	0.00
Primer Under 3.5 lbs/gal	7727437	Barium Sulfate	0.00	0.00	0.00	0.00
Primer Over 3.5 lbs/gal	7779900	Zinc Phosphate	0.00	0.00	0.00	0.00
Primer Under 3.5 lbs/gal	7779900	Zinc Phosphate	0.00	0.00	0.00	0.00
Primer Under 3.5 lbs/gal	7782425	Graphite	0.00	0.00	0.00	0.00
Primer Over 3.5 lbs/gal	8032306	VM&P Naptha	0.00	0.00	0.11	0.00
Primer Under 3.5 lbs/gal	13463677	Titanium Dioxide	0.00	0.00	0.00	0.00
Primer Over 3.5 lbs/gal	14807966	Talc	0.00	0.00	0.00	0.00
Primer Under 3.5 lbs/gal	14807966	Talc	0.00	0.00	0.00	0.00
Primer Under 3.5 lbs/gal	14808607	Fiberglass and ceramic	0.00	0.00	0.00	0.00
Primer Under 3.5 lbs/gal	25068386	Epoxy Resin	0.00	0.00	10.85	0.00
Primer Under 3.5 lbs/gal	27138314	Dibenzoate Propanol	0.00	0.00	0.00	0.00
Primer Under 3.5 lbs/gal	41556267	Bis (1,2,2,6,6-pentamethyl-4-piperdinyl) Sebacate	0.00	0.00	0.38	0.00
Primer Under 3.5 lbs/gal	51274001	Iron Oxide	0.00	0.00	0.00	0.00

2021 Year End Report - SUM of CAS Pounds

Category Name	CAS#	Chemical Name	Sum Of HAPs	Sum Of TACs	Sum Of VOCs	Sum Of NRs
Primer Under 3.5 lbs/gal	63148652	POLYVINYL BUTYRALDEHYDE	0.00	0.00	0.00	0.00
Primer Under 3.5 lbs/gal	64742945	Heavy aromatic naphtha (petrol)	0.00	0.00	1.91	0.00
Primer Under 3.5 lbs/gal	68476857	Liquified Petroleum Gas	0.00	23.40	23.40	0.00
Primer Under 3.5 lbs/gal	70942120	Acrylic Polymer	0.00	0.00	0.00	0.00
		Totals for Primers:	**42.30**	**529.27**	**347.32**	**234.32**
TopCoat	1	Acrylic Polymer	0.00	0.00	0.00	0.00
TopCoat	3	Aliphatic Hydrocarbon	0.00	0.00	0.00	0.00
TopCoat	22	Fe2O3 Coated Mica	0.00	0.00	0.00	0.00
TopCoat	64	Trade Secret	0.00	0.00	0.00	0.00
TopCoat	78	Nitrosoamine Functional Acrylic	0.00	0.00	0.00	0.00
TopCoat	79	Acrylic Resin	0.00	0.00	0.00	0.00
TopCoat	81	Carbazole Violet Pigment	0.00	0.00	0.00	0.00
TopCoat	67630	Isopropyl alcohol (Isopropanol)	0.00	3,343.49	3,343.49	0.00
TopCoat	67641	Acetone	0.00	3,437.25	0.00	3,437.25
TopCoat	71363	N-Butyl Alcohol	0.00	640.84	640.84	0.00
TopCoat	74986	Propane	0.00	0.00	2.86	0.00
TopCoat	75285	2-Methyl propane (isobutane)	0.00	0.00	0.38	0.00
TopCoat	77587	Dibutyl tin dilaurate	0.00	0.00	0.00	0.00
TopCoat	78104	Ethyl silicate	0.00	6.25	6.25	0.00
TopCoat	78933	2-Butanone (MEK; Methyl ethyl ketone)	0.00	2,615.59	2,615.59	0.00
TopCoat	80626	Methyl Methacrylate	36.82	36.82	36.82	0.00
TopCoat	81776	C.I. Pigment Blue 60	0.00	0.00	0.00	0.00
TopCoat	85687	Butyl Benzyl Phthalate	0.00	0.00	0.03	0.00
TopCoat	95636	1,2,4-Trimethyl Benzene	0.00	0.00	204.31	0.00
TopCoat	96297	Methyl Ethyl Ketoxime	0.00	0.00	0.00	0.00
TopCoat	97869	Isobutyl methacrylate	0.00	0.00	0.00	0.00
TopCoat	97881	N-butyl methacrylate	0.00	0.00	0.00	0.00
TopCoat	98828	Cumene (Isopropylbenzene)	4.06	4.06	4.06	0.00
TopCoat	100414	Ethylbenzene	177.45	177.45	177.45	0.00
TopCoat	103093	2-Ethylhexyl Acetate	0.00	0.00	6,012.31	0.00
TopCoat	106978	Butane	0.00	2.81	2.81	0.00
TopCoat	108101	Methyl isobutyl ketone (MIBK; Hexone)	0.47	0.47	0.47	0.00
TopCoat	108656	Methyloxy-2-propanol acetate	0.00	0.00	2.99	0.00
TopCoat	108678	1,3,5-Trimethylbenzene	0.00	0.00	3.62	0.00
TopCoat	108883	Toluene	6.49	6.49	6.49	0.00
TopCoat	110190	Isobutyl Acetate	0.00	1.65	1.65	0.00

2021 Year End Report - SUM of CAS Pounds

Category Name	CAS#	Chemical Name	Sum Of HAPs	Sum Of TACs	Sum Of VOCs	Sum Of NRs
TopCoat	110430	Methyl n-amyl ketone	0.00	22,762.74	22,762.74	0.00
TopCoat	111762	2-Butoxyethanol (Butyl cellosolve; Ethylene glycol monobutyl ether)	0.00	339.79	339.79	0.00
TopCoat	112072	2-Butoxy Ethyl Acetate	5.18	0.00	5.18	0.00
TopCoat	123546	Acetyl acetone	0.00	0.00	3,110.05	0.00
TopCoat	123864	n-Butyl acetate	0.00	29,306.57	29,306.57	0.00
TopCoat	141786	Ethyl Acetate	0.00	35,560.26	35,560.26	0.00
TopCoat	142825	Heptane (n-Heptane)	0.00	5,045.38	5,045.38	0.00
TopCoat	147148	Phthalocyanine Blue Pgmnt.	0.00	0.00	0.00	0.00
TopCoat	280579	Triethylenediamine	0.00	0.00	0.00	0.00
TopCoat	540885	tert-Butyl acetate	0.00	2,143.94	2,143.94	0.00
TopCoat	624419	2-Methyl Butyl Acetate	0.00	0.00	179.40	0.00
TopCoat	628637	n-Amyl acetate	0.00	505.81	505.81	0.00
TopCoat	763699	3-Ethyl ethoxypropionate	0.00	0.00	1,883.05	0.00
TopCoat	1047161	Quinacridone Pigment	0.00	0.00	0.00	0.00
TopCoat	1119400	Dimethyl Glutarate	0.00	0.00	6.07	0.00
TopCoat	1309371	Iron oxide Pigment, Fe2O3 as Fe	0.00	0.00	0.00	0.00
TopCoat	1314234	Zirconium Oxide	0.00	0.00	0.00	0.00
TopCoat	1317653	Calcium Carbonate	0.00	0.00	0.00	0.00
TopCoat	1317802	Titanium Dioxide	0.00	0.00	0.00	0.00
TopCoat	1328536	Phthalocyanine Green Pgmnt.	0.00	0.00	0.00	0.00
TopCoat	1330207	Xylenes	359.91	359.91	359.91	0.00
TopCoat	1332587	Clay, pumice	0.00	0.00	0.00	0.00
TopCoat	1333864	Carbon Black	0.00	195.80	0.00	0.00
TopCoat	1344281	Aluminum Oxide	0.00	0.00	0.00	0.00
TopCoat	1879090	Topanol A	0.00	0.00	0.00	0.00
TopCoat	2807309	2-Propoxyethanol	0.38	0.00	0.38	0.00
TopCoat	3089176	PIGMENT RED 202	0.00	0.00	0.00	0.00
TopCoat	5131668	Higher Glycol Ethers	0.00	0.00	0.00	0.00
TopCoat	5521313	PERYLENE MAROON	0.00	0.00	0.00	0.00
TopCoat	7429905	Aluminum / Aluminum Pigment	0.00	0.00	0.00	0.00
TopCoat	7440224	Silver, metals and soluble compounds	0.00	0.00	0.00	0.00
TopCoat	7631869	Silica (amorphous)	0.00	0.00	0.00	0.00
TopCoat	7727437	Barium Sulfate	0.00	0.00	0.00	0.00
TopCoat	7779900	Zinc Phosphate	0.00	0.00	0.00	0.00
TopCoat	8032306	VM&P Naptha	0.00	0.00	0.38	0.00
TopCoat	8052413	Stoddard Solvent	0.00	0.00	280.19	0.00
TopCoat	12001262	Mica	0.00	0.00	0.00	0.00

2021 Year End Report - SUM of CAS Pounds

Category Name	CAS#	Chemical Name	Sum Of HAPs	Sum Of TACs	Sum Of VOCs	Sum Of NRs
TopCoat	12236623	Monoazo Pigment	0.00	0.00	0.00	0.00
TopCoat	13463677	Titanium Dioxide	0.00	0.00	0.00	0.00
TopCoat	14059337	Bismuth Vanadium Oxide	0.00	0.00	0.00	0.00
TopCoat	18282105	Tin Oxide	0.00	0.00	0.00	0.00
TopCoat	21645512	Aluminum hydroxide	0.00	0.00	0.00	0.00
TopCoat	25322683	Polyethylene glycol, 400	0.00	0.00	1.36	0.00
TopCoat	27216371	Sucrose Acetate Isobutyl Resin	0.00	0.00	0.00	0.00
TopCoat	27813021	Hydroxylalkyl Methacrylate	0.00	0.00	0.00	0.00
TopCoat	27925071	Synthetic Resin	0.00	0.00	0.00	0.00
TopCoat	28182812	Homopolymer of HDI	0.00	0.00	0.00	0.00
TopCoat	36888990	Isoindolinone Pigment	0.00	0.00	0.00	0.00
TopCoat	41556267	Bis (1,2,2,6,6-pentamethyl-4-piperdinyl) Sebacate	0.00	0.00	247.23	0.00
TopCoat	51274001	Iron Oxide	0.00	0.00	0.00	0.00
TopCoat	63231674	Silicon Dioxide	0.00	0.00	0.00	0.00
TopCoat	64741657	Naphtha (petroleum) heavy alkylated (isopar)	0.00	0.00	462.07	0.00
TopCoat	64742478	Petroleum distillate, hydrotreated light	0.00	0.00	118.23	0.00
TopCoat	64742489	Petroleum distillate, hydrotreated light	0.00	0.00	1,828.76	0.00
TopCoat	64742887	Mineral spirits	0.00	0.00	195.80	0.00
TopCoat	64742898	Petroleum naphtha, paraffins & naphthenes	0.00	0.00	0.38	0.00
TopCoat	64742956	Volatile Petroleum Distillate	0.00	0.00	547.69	0.00
TopCoat	65997173	Sodium Calcium Magnesium Silicate	0.00	0.00	0.00	0.00
TopCoat	68134225	C.I. Pigment Yellow 154	0.00	0.00	0.00	0.00
TopCoat	68476857	Liquified Petroleum Gas	0.00	1.90	1.90	0.00
TopCoat	68476868	Propane/isobutane(1)	0.00	0.00	1,147.80	0.00
TopCoat	68987633	CI Blue Pigment	0.00	0.00	0.00	0.00
TopCoat	69153522	Polyester Resin	0.00	0.00	0.00	0.00
TopCoat	69215549	Acrylic Polymer	0.00	0.00	0.00	0.00
TopCoat	82919377	Methyl(1,2,2,6,6-Pentamethyl-4-Piperidinyl) Sebacate	0.00	0.00	0.00	0.00
TopCoat	84632655	CI Pigment Red 254	0.00	0.00	0.00	0.00
TopCoat	92797609	Amorphous Silica	0.00	0.00	0.00	0.00
TopCoat	104032395	Acrylic Polymer	0.00	0.00	0.00	0.00
TopCoat	104376752	PolyOxyAlkylenes	0.00	0.00	0.00	0.00
TopCoat	104810471	Beta-(3-(2m-Benzotriazol-2-YL)-4-Hydroxy-5-Tert-Butylphenyl) Propionate	0.00	0.00	0.00	0.00
TopCoat	104810482	Poly(Oxy-1,2-Ethanediyl)-,Alpha-3-3-(2H-Benzotriazol-2-yl)-5-(1,1-Eimethylethyl)-4-Hydroxy Phenyl	0.00	0.00	0.00	0.00

2021 Year End Report - SUM of CAS Pounds

Category Name	CAS#	Chemical Name	Sum Of HAPs	Sum Of TACs	Sum Of VOCs	Sum Of NRs
TopCoat	129922221	Polyester Resin	0.00	0.00	0.00	0.00
TopCoat	163292566	Polyester Resin (no official CAS No.)	0.00	0.00	0.00	0.00
		Totals for Topcoats:	**590.76**	**106,495.26**	**119,102.74**	**3,437.25**

2021 Axalta Purchase

Part #	Size	Accounting quantity (LITER)	Gallons Quantity
1001S	-8	14	4
1002S	-8	77	20
1004S	-8	14	4
1006S	-8	9	2
1020S	-8	3	1
1023S	-8	20	5
1054S	-8	3	1
1220S	01	30	8
1820-10001	250	1893	500
1960-70006	40	303	80
1960-70225	50	189	50
294S	01	15	4
294S	PT	3785	1000
359S	-8	14	4
3949S	01	121	32
528-31210	250	1893	500
6210E	55	416	110
7285S	55	416	110
8800E	55	1249	330
8840S	01	15	4
8875S	55	416	110
8875S	01	4	1
8890S	01	15	4
8890S	50	2082	550
8989S	01	76	20
PT101	01	151	40
PT105	01	242	64
PT1051	-4	16	4
PT107	01	30	8
PT110	01	76	20
PT112	01	15	4
PT114	01	151	40
PT116	-4	6	1
PT120	01	45	12
PT122	01	45	12
PT124	01	121	32
PT127	01	30	8
PT132	01	45	12
PT140	01	30	8
PT144	01	91	24
PT148	01	91	24
PT154	01	151	40
PT162	01	15	4
PT164	01	45	12
PT165	55	416	110
PT166	01	15	4
PT167	01	76	20
PT169	01	106	28
PT183	01	15	4
PT187	01	45	12
PT198	55	416	110
PT199	55	625	165
PT298	55	208	55
TP28448	55	208	55
VGF31588	01	30	8
1001S	-8	57	15
1002S	-8	48	13
1004S	-8	51	13
1005S	-8	9	2
1006S	-8	9	2
1010S	-8	3	1
1014S	-8	2.838	1
1018S	-8	2.838	1
1020S	-8	14.19	4
1023S	-8	19.866	5
1052S	-8	2.838	1
1054S	-8	8.514	2
1057S	-8	5.676	1
1820-1000	250	946.25	250
1960-7000	40	302.8	80
294S	01	15.14	4
294S	PT	1892.5	500
359S	-8	17.028	4
528-3121(	250	946.25	250

Material	Axalta Product Code	Amount Purchase (gal)	Density (lb/gal)	VOC (lb/gal)	Pounds Purchase Subtract VOC	Total Pounds Purchased Without VOC
	7285S	769.92	7.27	6.50	592.84	6,366.12
	PT196	16.00	8.81	2.90	94.55	
Colored Chassis	6210E	1,170.87	8.05	3.20	5,678.73	
	1220S	32.00	10.82	3.10	247.01	544.68
	235S	12.00	10.50	1.30	110.39	
	373P27678	0.00	9.50	2.90	0.00	
	373P27680	0.00	9.11	3.20	0.00	
Primer	410A	46.19	6.68	2.63	187.28	
Activator	294S	8,357.09	9.01	2.30	56,076.07	56,076.07
Specialty Coating	3401S	12.00	7.29	6.90	4.68	4.68
	528-31210	4,499.51	7.99	3.30	21,080.20	43,568.75
Chassis Black	1820-10001	4,499.51	8.30	3.30	22,488.55	
	8840S	63.99	8.02	3.50	289.25	32,711.93
	8890S	5,757.37	9.43	3.80	32,414.01	
Clearcoat	RK-40315	2.00	8.04	3.70	8.68	
Topcoat	1001S	81.72	20.75	2.10	1,524.07	73,155.81
	1002S	138.20	20.20	2.00	2,515.21	
	1004S	71.22	21.19	2.10	1,359.65	
	1005S	21.74	20.75	2.10	405.49	
	1006S	28.49	21.60	2.20	552.69	
	1007S	3.00	21.19	2.10	57.25	
	1009S	2.25	21.60	2.20	43.63	
	1010S	3.00	22.62	2.30	60.94	
	1014S	3.00	20.83	2.10	56.17	
	1018S	0.75	20.83	2.10	14.04	
	1020S	41.98	23.31	2.30	882.09	
	1021S	3.00	24.15	2.40	65.23	
	1023S	63.23	24.15	2.40	1,375.17	
	1024S	9.75	22.50	2.30	196.88	
	1025S	0.00	22.53	2.30	0.00	
	1052S	6.75	23.70	0.00	159.92	
	1054S	14.24	22.53	0.00	320.93	
	1055S	3.00	29.12	0.00	87.33	
	1056S	2.25	22.53	0.00	50.67	
	1057S	6.75	26.20	0.00	176.78	
	1960-70006	959.90	11.42	3.80	7,314.40	
	1960-70225	349.96	11.33	3.80	2,635.21	
	8800E	2,317.75	7.99	3.80	9,711.36	
	PT101	425.95	14.82	3.50	4,821.79	
	PT1015	0.50	8.63	3.70	2.46	
	PT105	755.92	8.37	3.60	3,605.73	
	PT1051	45.98	9.27	4.10	237.73	
	PT107	51.99	8.16	3.50	242.29	
	PT110	151.98	8.81	4.50	655.05	
	PT112	40.00	9.10	4.30	191.98	
	PT114	363.96	9.16	4.30	1,768.85	
	PT116	10.50	8.55	4.00	47.76	
	PT120	83.99	8.31	3.70	387.20	
	PT122	71.99	8.47	3.60	350.60	
	PT124	279.97	8.61	3.90	1,318.66	
	PT127	75.99	8.94	3.60	405.80	
	PT132	203.98	8.67	4.10	932.18	
	PT133	8.00	8.15	3.70	35.60	
	PT140	107.99	14.57	3.60	1,184.63	
	PT144	131.99	9.10	3.60	725.92	
	PT148	119.99	9.35	3.50	701.92	
	PT154	211.98	9.43	3.30	1,299.42	
	PT162	44.00	8.53	3.90	203.70	
	PT164	191.98	8.69	3.70	957.98	
	PT165	636.93	9.06	3.50	3,541.33	
	PT166	28.00	8.75	3.50	146.98	
	PT167	143.98	8.65	3.80	698.32	
	PT169	251.97	8.89	3.50	1,358.13	
	PT181	20.00	12.52	3.30	184.38	
	PT183	83.99	9.92	4.20	480.43	
	PT185	0.00	13.62	3.50	0.00	
	PT187	91.99	10.01	4.30	525.26	
	PT190	36.00	8.08	3.80	154.06	
	PT195	47.99	7.46	5.40	98.87	
	PT198	549.94	8.50	2.40	3,354.63	
	PT199	1,374.85	8.87	1.70	9,857.68	
	PT297	0.00	7.79	5.10	0.00	
	PT298	604.93	8.27	3.20	3,067.02	
	8875S	1,158.87	7.24	7.20	46.35	

Assumption	Topcoat Usage x100 (%)
Base Booth	0.74
Manual Booth	0.13
Touchup Booth	0.025
Spoven Booth	0.105

Total Waste from liquid paint and still bottom

Waste	2021 (lb)	2020 (lb)	Averge (lb)	2021 (gal)	2020 (gal)	Averge (gal)
Liquid Waste Paint	19340	16936	18,138	2310	1925	2,118
Thinner Still Bottom	63829	59126	61,478	7700	7205	7,453

% of Liquid Waste Paint in Thinner Still Bottom

Density of Still Bottom	8.25
Density of Liquid Waste Paint	8.57
Density of Thinner	6.69
% Paint in Still Bottom	0.83
Paint in Thinner Still Bottom (lb)	51,103.78

Total Paint Purchase

	2021	2020
	lbs	lbs
Topcoat	347,640	304,781
Primer	962	1,181
Total	348,602	305,962
Average	327,282	

Waste Fraction 0.21

						% of EU pertaining to each segment								
Point	**Segment**	**Description**	**SCC_Code**	**ProcessQuantity2021**	**ProcessUnits**	**EU1 %**	**EU2 %**	**EU3 %**	**EU4 %**	**EU5 %**	**EU6 %**	**EU7 %**	**EU8 %**	**EU9 %**
1	1	Natural Gas Combustion	1-02-006-02	204.98	1000 Therms	0	0	0	0	0	0	0	100	0
1	2	Natural Gas Combustion	1-02-006-03	380.68	1000 Therms	0	0	0	0	0	0	0	100	0
2	1	Topcoat Operations	4-02-025-01	38616	Gal	0	0	0	36	58	6	0	0	0
2	2	Parts/Equipment Cleaning	4-02-025-02	18378	Gal	14.3	14.3	14.3	14.3	14.3	14.3	14.3	0	0
2	3	Primer Operations	4-02-025-01	150	Gal	0	0	0	0	100	0	0	0	0
2	4	Undercoat/Seal/Lubricate/ Adhesive Operations	4-02-025-99	387241	Gal	14.3	14.3	14.3	14.3	14.3	14.3	14.3	0	0

Point	**Segment**	**Description**	**Comment**
2	1	Topcoat Operations	Topcoats are applied to the finished trucks built at the facility. They are applied in either the waterwash or dry filter paint booths using spray equipment. Due to the design of the spray equipment and waterwash paint booths, and the painting procedures employed, the volatile solvents in the paints are stripped by the continuous air flow in the booths and are not expected to enter the water circulating in the bottom of the booths. Hazardous constituents in the solid portion of the paint are encapsulated by the cross-linked paint polymers and do not generally migrate into the wastewater. Kenworth's paint supplier, Axalta, has a continuing program to eliminate hazardous constituents from their products.
2	2	Parts/Equipment Cleaning	These are products used for cleaning trucks before painting, for cleaning of painting equipment, or for general factory cleaning.
2	3	Primer Operations	Primers are paint products used on bare metal or composite truck parts prior to topcoating. Most truck parts arrive at the plant ready for paint, so little primer is used.
2	4	Undercoat/Seal/Lubricate/ Adhesive Operations	All materials not listed in the other three categories are listed here. This category includes lubricants, adhesives, sealants, truck fluids (diesel, antifreeze, motor oil, transmission fluid, etc.), gases used in manufacturing, and other products.

PRE-CONTROL POTENTIAL TO EMIT FOR EU-2
Axel Weld Cartridge Dust Collector

1. Unit Description:

Axel weld cartridge dust collector filters air exhaust from welding and grinding of truck components.

2. Make/Model: Universal Air System/Supraflo-SFC-4-2

3. Filter Efficiency: *99.5% @0.5 micron*

4. Frequency collection container is dumped and amount dumped:

The collected container is dumped whenever it is 80% full,
the filter and container is being checked on monthly and quarterly PMs.

Per Facility Engineering Manager, the container has not been dumped for at least 10 years.
facility does change out the filters as needed and the filters have been replaced twice in the last 10 years.

The amount of particulates in the container was weighed to be about 1lbs over 10 years period.
Therefore, the Pre-control PM10 PTE is insignificant.

PRE-CONTROL POTENTIAL TO EMIT FOR EU-3
Central Vacuum System

1. Unit Description:

Central Vacuum System handles waste consisting primarily of inert, inorganic dust vacuumed from the factory floor and from trucks during assembly, cleaning and sanding operations; including sanding from plated fasteners used in assembly of products.

2. Make/Model: Spencer Tubular Bag Separator/30207C1

3. Filter Efficiency: *99.5% @0.5 micron*

4. Frequency collection container is dumped and amount dumped:

The collected container is dumped whenever it is 80% full, the container is being checked weekly on PM.

Year	Trucks Made	PM10 dumped (lbs)
2019	4807	1850
2020	3734	NA (due to Covid)
2021	4235	1395
2022	3943	1285
Average	4328	1510

Average lbs PM10 generated/truck	0.35

5. Potential to Emit:

The pre-control PM10 PTE is based on maximum truck production of 44 trucks per day.
Pre-controls PTE is estimated by multiplying the maximum trucks made/year and average PM10 generated/truck.
Pre-Control PM10 PTE = 44(trucks/day)x250(production day/year)x0.35(lbs PM10 generated/truck)
Pre-Control PM10 PTE = 3850 lbs PM10/year
Pre-Control PM10 PTE = 1.925 tons PM10/year

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

GREENHOUSE GAS (GHG) EMISSIONS

2021 PACCAR Energy Data for GHG Emissions (EDGE-M) Tracking: Manufacturing and Tech Centers

1 Date 2021 EDGE-M Tracking was updated: 5/8/2023

Identify the facility envelope consistent with this EDGE-M update: Kenworth Renton Assembly Plant

EDGE-M Tracking Contact Information

Name	Chris Bui
Email	Chris.Bui@PACCAR.Com
Phone Number	(425) 227-5049

2 Manufacturing Facilities: Please indicate the number of units produced (Specify the types of units and add more rows as appropriate to allow validation)

1st Qtr	2nd Qtr	3rd Qtr	4th Qtr	Total	Units
1,165	1,257	910	903	**4,235**	Trucks
0	0	0	0	**0**	Gliders
Total	Total	Total	Total	Total	

3 Please indicate the interior area this EDGE-M Tracking report covers

(Sq. Ft or Sq. Meters of interior space consistent with the reported energy and emissions envelop.)

Amount	Units
373,003	Sq. Ft.

4 **Total Green House Gas**

Material Fuel Energy	Usage	Unit	CO2 Emission Factor	CO2 Emission Factor Unit	CO2/CO2e Emission (kg)	CH4 Emission Factor	CH4 Emission Factor Unit	CH4 Emission (kg)	N2O Emission Factor	N2O Emission Factor Unit	N2O Emission (kg)	Fluorinated Gases (kg)	Total Emission (kg)
Natural Gas	58,531.96	MMBtu	53.06	kg CO2 per MMBtu	3,105,705.53	1	g CH4 per MMBtu	58.53	0.1	g N2O per MMBtu	5.85	-	3,105,769.92
Electricity	11,375.48	MWH	634.6	lbs CO2/CO2e per MWH	3,274,424.89	0.058	lbs CH4 per MWH	299.27	0.008	lbs N2O per MWH	41.28	-	3,274,765.44
Propane/LPG	20,428.00	gallon	5.72	Kg CO2 per gallon	116,848.16	0.27	g CH4 per gallon	5.52	0.05	g N2O per gallon	1.02	-	116,854.70
Diesel	13,943.76	gallon	10.21	Kg CO2 per gallon	142,365.83	-	-	-	-	-	-	-	142,365.83
Gasoline	2.30	gallon	8.78	Kg CO2 per gallon	20.19	0.0071	g CH4 per mile	0.0005	0.0046	g N2O per mile	0.0003	-	0.0008
Coolers, fridges, soda vendors (r134a, r404a)	2,027.00	gram	-	-	-	-	-	-	-	-	-	2.03	2.03
Truck AC (r134a)	29,645.00	gram	-	-	-	-	-	-	-	-	-	29.65	29.65
HVAC Unit (r410a)	1,998.00	gram	-	-	-	-	-	-	-	-	-	1.9980	2.00
CO2 Gas Cylinder	400.00	pound	-	-	181.44	-	-	-	-	-	-	-	181.44
Total Emission (kg)				**6,639,546.04**			**363.32**			**48.15**		**33.67**	**6,639,970.99**

Emission Unit (EU)	EU 1	EU 2	EU 3	EU 4	EU 5	EU 6	EU 7	EU 8	EU 9	Total
Green House Gas (kg)	547,046.23	294,728.89	2,844,840.13	358,534.24	774,114.02	260,291.28	229,233.58	1,324,064.32	7,118.29	6,639,970.99
Green House Gas (ton)	273.52	147.36	1,422.42	179.27	387.06	130.15	114.62	662.03	3.56	3,319.99

MONTH	UNITS PRODUCED	DEGREE DAYS HEAT	DEGREE DAYS COOL	ELECTRICITY NET	ELECTRICITY KWH	ELECTRICITY COST	NATURAL GAS Therm	NATURAL GAS COST	TOTAL MMBTU	MMBTU/ UNIT	TOTAL COST	COST/ UNIT	NG THERM/ Engine	KWH/ Engine
JANUARY 21	373	504	0	504	966,058	$83,403	80,796.00	$10,692	11,376	30.5	$ 94,095	$ 252.27	217	2590
FEBRUARY 21	322	510	0	510	888,207	$78,144	82,105.00	$10,776	11,241	34.9	$ 88,920	$ 276.15	255	2758
MARCH 21	470	473	0	473	1,029,898	$87,327	78,411.27	$10,540	11,355	24.2	$ 97,867	$ 208.23	167	2191
APRIL 21	454	260	39	299	951,315	$82,121	48,714.81	$8,643	3,246	7.1	$ 90,763	$ 199.92	107	2095
MAY 21	399	144	51	195	977,657	$83,544	37,365.00	$7,903	7,072	17.7	$ 91,447	$ 229.19	94	2450
JUNE 21	404	36	262	298	979,896	$82,789	20,956.57	$6,557	5,439	13.5	$ 89,346	$ 221.15	52	2425
JULY 21	372	0	286	286	959,264	$83,767	16,308.08	$5,966	4,904	13.2	$ 89,733	$ 241.22	44	2579
AUGUST 21	351	0	258	258	993,642	$86,232	17,534.74	$6,122	5,144	14.7	$ 92,354	$ 263.12	50	2831
SEPTEMBER 21	187	21	86	107	788,548	$72,244	15,912.52	$5,918	4,282	22.9	$ 78,162	$ 417.98	85	4217
OCTOBER 21	330	231	0	231	936,536	$84,469	43,081.81	$8,378	7,504	22.7	$ 92,847	$ 281.36	131	2838
NOVEMBER 21	327	349	0	349	930,379	$83,966	52,807.84	$9,151	8,455	25.9	$ 93,117	$ 284.76	161	2845
DECEMBER 21	246	648	0	648	974,076	$86,277	91,325.91	$11,812	12,456	50.6	$ 98,089	$ 398.74	371	3960
TOTAL	4,235			4,158	11,375,476	994,282	585,320	$ 102,458	92,475		1,096,741			

2021 PACCAR Energy Data for GHG Emissions (EDGE-M) Tracking: Manufacturing and Tech Centers					
Date 2021 EDGE-M Tracking was updated		5/8/2023			
		These cells will be filled automatically sheet ID			
Identify the facility envelope consistent with this EDGE-M update		Kenworth Renton Assembly Plant			
5 Natural Gas Usage (reported Qtrly)		**List Facilities Separately and Use Multiple Columns for Multiple Meters.**			**Total**
Billing period should be based on invoice billing periods and may not strictly correspond with calendar months. (ie. If the invoice covers utility service from Jan 22 - Feb 22, this should be reported as the invoice units of energy for February.) If the invoice period is not monthly please indicate the appropriate billing period.)	Truck Plant	Facility or Meter #	Facility or Meter #	Etc	
	Therms	List Energy Units on Bill. Values Must Be Clearly Provided on Bill. *	List Energy Units on Bill. Values Must Be Clearly Provided on Bill. *	List Energy Units on Bill. Values Must Be Clearly Provided on Bill. *	List Energy Units on Bill. Values Must Be Clearly Provided on Bill. *
January	80,796.00				80,796.00
February	82,105.00				82,105.00
March	78,411.27				78,411.27
1st Qtr Subtotal	**241,312.27**	**0.00**	**0.00**	**0.00**	**241,312.27**
April	48,714.81				48,714.81
May	37,365.00				37,365.00
June	20,956.57				20,956.57
2nd Qtr Subtotal	**107,036.38**	**0.00**	**0.00**	**0.00**	**107,036.38**
July	16,308.08				16,308.08
August	17,534.74				17,534.74
September	15,912.52				15,912.52
3rd Qtr Subtotal	**49,755.34**	**0.00**	**0.00**	**0.00**	**49,755.34**
October	43,081.81				43,081.81
November	52,807.84				52,807.84
December	91,325.91				91,325.91
4th Qtr Subtotal	**187,215.56**	**0.00**	**0.00**	**0.00**	**187,215.56**
Total	**585,319.55**	**0.00**	**0.00**	**0.00**	**585,319.55**

* Enter "0" if No Natural Gas was used

2021 PACCAR Energy Data for GHG Emissions (EDGE-M) Tracking: Manufacturing and Tech Centers

Date 2021 EDGE-M Tracking was updated	5/8/2023
	These cells will be filled automatically sheet ID
Identify the facility envelope consistent with this EDGE-M update	Kenworth Renton Assembly Plant

6 Diesel Usage by PACCAR operations (reported quarterly) - Please exclude diesel provided to customers

1st Qtr	Describe emission source	Usage Amount (Gallons)	Provide details of estimation method, basis, calculations and assumptions (based on inventory and purchasing records, MPG, mileage, generator test frequency).			
		Invoice Units	Basis of Estimation	Basis of Estimation	Basis of Estimation	Basis of Estimation
	Dyno/Drive	2,812	14 miles/truck	5.8 mpg		
	Truck test/verification	932	2 hrs idle/truck	0.4 gal/hr		
	Generator Testing	9.90	9 hrs tested/yr	4.4 gal/hr@idle	1 test/week	
	Fire Pump Testing	73.44	25 hrs tested/yr	11.75 gal/hr	1 test/week	
	Subtotal	**3,827.41**				
2nd Qtr	Describe emission source	Usage Amount (Gallons)	Provide details of estimation method, basis, calculations and assumptions (based on inventory and purchasing records, MPG, mileage, generator test frequency).			
		Invoice Units	Basis of Estimation	Basis of Estimation	Basis of Estimation	Basis of Estimation
	Dyno/Drive	3,034	14 miles/truck	5.8 mpg		
	Truck test/verification	1,006	2 hrs idle/truck	0.4 gal/hr		
	Generator Testing	9.90	9 hrs tested/yr	4.4 gal/hr@idle	1 test/week	
	Fire Pump Testing	73.44	25 hrs tested/yr	11.75 gal/hr	1 test/week	
	Subtotal	**4,123.08**				
3rd Qtr	Describe emission source	Usage Amount (Gallons)	Provide details of estimation method, basis, calculations and assumptions (based on inventory and purchasing records, MPG, mileage, generator test frequency).			
		Invoice Units	Basis of Estimation	Basis of Estimation	Basis of Estimation	Basis of Estimation
	Dyno/Drive	2,197	14 miles/truck	5.8 mpg		
	Truck test/verification	728	2 hrs idle/truck	0.4 gal/hr		
	Generator Testing	9.90	9 hrs tested/yr	4.4 gal/hr@idle	1 test/week	
	Fire Pump Testing	73.44	25 hrs tested/yr	11.75 gal/hr	1 test/week	
	Subtotal	**3,007.89**				
4th Qtr	Describe emission source	Usage Amount (Gallons)	Provide details of estimation method, basis, calculations and assumptions (based on inventory and purchasing records, MPG, mileage, generator test frequency).			
		Invoice Units	Basis of Estimation	Basis of Estimation	Basis of Estimation	Basis of Estimation
	Dyno/Drive	2,180	14 miles/truck	5.8 mpg		
	Truck test/verification	722	2 hrs idle/truck	0.4 gal/hr		
	Generator Testing	9.90	9 hrs tested/yr	4.4 gal/hr@idle	1 test/week	
	Fire Pump Testing	73.44	25 hrs tested/yr	11.75 gal/hr	1 test/week	
	Subtotal	**2,985.39**				

* Enter "0" if No Diesel was used

2021 PACCAR Energy Data for GHG Emissions (EDGE-M) Tracking: Manufacturing and Tech Centers					
Date 2021 EDGE-M Tracking was updated	5/8/2023				
	These cells will be filled automatically sheet ID				
Identify the facility envelope consistent with this EDGE-M update	Kenworth Renton Assembly Plant				
7 Electricity Usage (quarterly)	**List Facilities Separately and Use Multiple Columns for Multiple Meters.**				
Billing period should be based on invoice billing periods and may not strictly correspond with calendar months. (ie. If the invoice covers utility service from Jan 21 - Feb 21, this should be reported as the invoice units of energy for February.) If the invoice period is not monthly please indicate the appropriate billing	**Truck Plant**			Etc	**Total**
	kWh			List Energy Units on Bill. Values Must Be Clearly Provided on Bill. *	List Energy Units on Bill. Values Must Be Clearly Provided on Bill. *
January	966,058				966,058
February	888,207				888,207
March	1,029,898				1,029,898
1st Qtr Subtotal	**2,884,163**	**0**	**0**	**0**	**2,884,163**
April	951,315				951,315
May	977,657				977,657
June	979,896				979,896
2nd Qtr Subtotal	**2,908,868**	**0**	**0**	**0**	**2,908,868**
July	959,264				959,264
August	993,642				993,642
September	788,548				788,548
3rd Qtr Subtotal	**2,741,454**	**0**	**0**	**0**	**2,741,454**
October	936,536				936,536
November	930,379				930,379
December	974,076				974,076
4th Qtr Subtotal	**2,840,991**	**0**	**0**	**0**	**2,840,991**
Total	**11,375,476**	**0**	**0**	**0**	**11,375,476**

* Enter "0" if No Electricity was used

2021 PACCAR Energy Data for GHG Emissions (EDGE-M) Tracking: Manufacturing and Tech Centers		
Date 2021 EDGE-M Tracking was updated	5/8/2023	
	These cells will be filled automatically sheet ID	
Identify the facility envelope consistent with this EDGE-M update	Kenworth Renton Assembly Plant	

8 Propane and LPG Usage (reported for the year only)

Describe emission source	Usage Amount Units (default Gal (US))	Provide details of calculations, assumptions, whether propane or LPG and basis of estimation.
Fork Lifts	20,428	Propane usage based on purchasing records
Total	20,428	Enter "0" if No Propane Used.

9 Gasoline, Petrol or Jet Fuel Usage (reported for the year only)

Specify fuel and describe emission source	Usage Amount Units (default Gal (US))	mpg	mileage	per unit base	Provide details of estimation method, basis, calculations and assumptions (based on inventory and purchasing records, MPG, mileage). Basis of Estimation
Company Van (Gas)	2.3	20	46		Recorded Mileage
Total	**2.3**	Enter "0" if No Gasoline Used.			

10 Usage of Carbon Containing Welding Gas or other fuels (per year)

Describe Fuel or Product	Usage Amount Units (default pounds (US))	Basis of Estimation	Basis of Estimation	Basis of Estimation	Provide details of estimation method, basis, calculations and assumptions (% concentration, based on inventory and purchasing records, include acetylene). Please indicate if product is a gas or liquid as measured. Basis of Estimation
CO_2 Gas	400	100 % CO_2 gas cyls	Purchasing Records		
Airgas Cyls.	135	Cyls are 75% Argon, 25% CO_2	Purchasing Records		
Total	**535**	Enter "0" if No Welding Gases Used.			

11 A/C and Refrigerant Emissions from Stationary Sources (per year)

Refrigerant	A/C Emissions Units (default grams) (454grams/lbs)	Emission Source (equipment)	Estimation Method or Basis (inventory and purchasing records, service receipts, emissions factor and equipment capacity).
R-134a	1925	Coolers, Fridges, Soda Vendors	EPA HFC-PFC Em. Factors
R-404a	102	Coolers, Fridges, Soda Vendors	EPA HFC-PFC Em. Factors
R-407c			
R410a	1998	HVAC unit (RTAH 7 Capacity 44lb)	EPA HFC-PFC Em. Factors
R-422d			
R-23			
R-508a			
R-507			
Other (Specify)			

Note: CFCs and HCFC are omitted (i.e. R-22, R-12, R-123, R-502). Enter "0" if No Applicable Refrigerants Used.

12 A/C and Refrigerant Emissions from production operations (per year)

Refrigerant	Units of Production (or service)	Emission Factor (grams per unit)	A/C Emissions (grams)	Estimation Method or Basis (inventory and purchasing records, service receipts, emissions factor and equipment capacity).
R-134a	4,235	7	29,645	
Other (Specify)				

Production default emission factor is 0.5% (wt) of refrigeration equipment capacity per unit filled or serviced (see examples below).

Refrigeration Equipment Capacity (lbs)	2.20	3.00	4.19
Production Emissions (grams/unit)	5	7	9

Enter "0" if No Applicable Refrigerants Used.

13 Other Sources of GHG from Operations (per year)

Describe emission source	Usage Amount Units	Basis of Estimation	Basis of Estimation	Basis of Estimation	Provide details of estimation method, basis, calculations and assumptions. Total Units
Total	**0**				

2021 PACCAR Energy Data for GHG Emissions (EDGE-M) Tracking: Manufacturing and Tech Centers				
Date 2021 EDGE-M Tracking was updated			5/8/23	
			These cells will will be filled automatically sheet ID	
Identify the facility envelope consistent with this EDGE-M update			Kenworth Renton Assembly Plant	
Fuel/Material/Energy	Emission Factor	Unit	Reference	Country
Natural Gas	53.06	kg CO2 per MMBtu	Federal Register EPA; 40 CFR Part 98; e-CFR, (see link below). Table C-1 and Table C-2 (78 FR 71950, Nov. 29, 2013, as amended at 81 FR 89252, Dec. 9, 2016), Table AA-1 (78 FR 71965, Nov. 29, 2013).	U.S.
Natural Gas	1	g CH4 per MMBtu	Federal Register EPA; 40 CFR Part 98; e-CFR, (see link below). Table C-1 and Table C-2 (78 FR 71950, Nov. 29, 2013, as amended at 81 FR 89252, Dec. 9, 2016), Table AA-1 (78 FR 71965, Nov. 29, 2013).	U.S.
Natural Gas	0.1	g N2O per MMBtu	Federal Register EPA; 40 CFR Part 98; e-CFR, (see link below). Table C-1 and Table C-2 (78 FR 71950, Nov. 29, 2013, as amended at 81 FR 89252, Dec. 9, 2016), Table AA-1 (78 FR 71965, Nov. 29, 2013).	U.S.
Propane/LPG	5.72	Kg CO2 per gallon	Federal Register EPA; 40 CFR Part 98; e-CFR, (see link below). Table C-1 and Table C-2 (78 FR 71950, Nov. 29, 2013, as amended at 81 FR 89252, Dec. 9, 2016), Table AA-1 (78 FR 71965, Nov. 29, 2013).	U.S.
Propane/LPG	0.27	g CH4 per gallon	Federal Register EPA; 40 CFR Part 98; e-CFR, (see link below). Table C-1 and Table C-2 (78 FR 71950, Nov. 29, 2013, as amended at 81 FR 89252, Dec. 9, 2016), Table AA-1 (78 FR 71965, Nov. 29, 2013).	U.S.
Propane/LPG	0.05	g N2O per gallon	Federal Register EPA; 40 CFR Part 98; e-CFR, (see link below). Table C-1 and Table C-2 (78 FR 71950, Nov. 29, 2013, as amended at 81 FR 89252, Dec. 9, 2016), Table AA-1 (78 FR 71965, Nov. 29, 2013).	U.S.
Gasoline	0.0046	g N2O per mile	EPA (2022) Inventory of U.S.Greenhouse Gas Emissions and Sinks: 1990-2020 (Annexes)	U.S.
Gasoline	8.78	Kg CO2 per gallon	Federal Register EPA; 40 CFR Part98; e-CFR. Table C-1(78FR71950, Nov.29,2013, as amended at 81FR89252, Dec.9,2016)	U.S.
Electricity	634.6	lbs CO2/CO2e per MWH	EPA eGRID2021, February 2023 (Table 1. Subregion Output Emission Rates)	NWPP (WECC Northwest)
Electricity	0.058	lbs CH4 per MWH	EPA eGRID2021, February 2023 (Table 1. Subregion Output Emission Rates)	NWPP (WECC Northwest)
Electricity	0.008	lbs N2O per MWH	EPA eGRID2021, February 2023 (Table 1. Subregion Output Emission Rates)	NWPP (WECC Northwest)

2021 PACCAR Energy Data for GHG Emissions (EDGE-M) Tracking: Manufacturing and Tech Centers

Date 2021 EDGE-M Tracking was updated	5/8/23
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Identify the facility envelope consistent with this EDGE-M update	Kenworth Renton Assembly Plant

Unit Conversions

10.7639	ft2/m2								
2204.62	lbs/tonne								
2.20462	lbs/kg	or	0.4536	kg/lbs					
1000	kWh/MWh								
0.278	MWh/GJ	or	0.02932981	MWh/Therm	or	0.0000278	MWh/MJ		
0.9478	MMBtu/GJ								
0.1	MMBtu/Therm	or	99976.129	Btu/therm	or	1	MMBtu/Dekatherm (decatherm)		
0.0034	MMBTU/kWh	or	3.41	MMBtu/MWh	or	3.02115E-07	MWh/Btu		
947.8	MMBtu/TJ		105.587	MJ/Therm					
1000	GJ/TJ	1000	MJ/GJ	10	Therms/DT	105.587	MJ/Therm		
3.7854	liters/gallon (US)	42	gallons/barrel (petroleum)						
4.54609	liters/gallon (Imperial)								
35.3147	ft3/m3	7.4805	gal/ft3	264.172	gal/m3	1000	liters/m3	0.001	megaliters/m3
453.6	grams/pound	1,000,000	kg/Gg						

pscleanair.org
Puget Sound Clean Air Agency

AIR OPERATING PERMIT

Puget Sound Clean Air Agency
1904 3rd Avenue, Suite 105
Seattle, Washington 98101

Issued in accordance with the provisions of Puget Sound Clean Air Agency Regulation I, Article 7 and Chapter 173-401 WAC.

Pursuant to Puget Sound Clean Air Agency Regulation I, Article 7 and Chapter 173-401 WAC, Kenworth Truck Company Renton (the permittee) is authorized to operate subject to the terms and conditions in this permit.

PERMIT NO.: 17796	**DATE OF ISSUANCE: January 16, 2019**
ISSUED TO:	**Kenworth Truck Company Renton**
PERMIT EXPIRATION DATE: January 16, 2024 Administrative Amendment: March 11, 2020 Administrative Amendment: December 13, 2022	

NAICS, Primary:	33612 (formerly SIC 3711)
Nature of Business:	Heavy Duty Truck Manufacturing
Mailing Address:	PO Box 9001, Renton, Washington 98057-9001
Facility Address:	1601 North 8th Street, Renton, Washington 98057
Responsible Official:	Scott Smith, Plant Manager
Telephone No.:	(425) 227-5801
E-mail:	Scott.Smith@PACCAR.com
Site Contact:	Chris Bui, Environmental Engineer
Telephone No.:	(425) 227-5049
E-mail.:	Chris.Bui@PACCAR.com

Puget Sound Clean Air Agency Approval:

Margaret Corbin
Engineer

John Dawson, P.E.
Engineering Manager

TABLE OF CONTENTS

List of Abbreviations

ASTM	American Society for Testing and Materials
CFR	Code of Federal Regulations
CPIS	Chemical Procurement Information System
Ecology	Washington State Department of Ecology
EPA	Environmental Protection Agency
FCAA	Federal Clean Air Act
HAP	Hazardous Air Pollutants
NESHAP	National Emissions Standard for Hazardous Air Pollutants
O&M Plan	Operation and Maintenance Plan
PSCAA	Puget Sound Clean Air Agency
PSD	Prevention of Significant Deterioration
RCW	Revised Code of Washington
RICE	Reciprocating Internal Combustion Engine
SIP	State Implementation Plan
VOC	Volatile Organic Compounds
WAC	Washington Administrative Code

NOTE: EPA updated the Washington SIP in 2020 and approved some Ecology and PSCAA regulations which are now federally enforceable. Therefore, some older, State Only (enforceable) requirements were made obsolete and should be deleted from the permit. Throughout this permit pertinent changes have been red-lined out or updated in red. Some of the condition numbers may need to be changed accordingly.

Section 1: Facility-wide Emission Limits

The requirements in Section 1 apply facility-wide. Tables 1 and 2 list the citation for the "enforceable requirement" and the adoption or effective date in the second column. 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 the Washington Department of Ecology (Ecology) and the Puget Sound Clean Air Agency (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. ~~Some requirements in WAC 173-400-040 may be deleted from the 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 third column in the tables is a brief description of the enforceable requirement and is not enforceable.

The fourth column in the tables identifies the "Compliance Method" which includes monitoring, recordkeeping and reporting obligations the permittee must conduct to comply with the permit. The compliance methods are listed in conditions below Tables 1 and 2. Following the monitoring method is an enforceable requirement of this permit. Inclusion of these requirements is in accordance with WAC 173-401-605(1) and WAC 173-401-615(1) and (2).

The "Reference Test Method" is listed in the fifth column. This 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.

In the event of conflict or omission between the information contained in the third column of the tables and the actual statute or regulation cited in the second column, 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.

A. General Facility-wide Emission Limits

The requirements in Table 1 and the associated compliance methods apply facility-wide.

Table 1. Facility-wide Emission Limits

Reqmt No.	Enforceable Requirement	Requirement Paraphrase (Information Only)	Compliance Method	Reference Test Method (See Section 7)
RACT Requirement				
1.1	PSCAA Reg I:3.04(a) (7/1/12) ~~WAC 173-400-040, first paragraph (9/20/93)~~ ~~WAC 173-400-040(1) (7/1/16, State Only)~~	All emission units are required to use RACT.	No monitoring required	Not applicable
Opacity and Particulate Matter Standards				
1.2	PSCAA Reg I: 9.03, except for 9.03(e) (5/1/04) ~~(3/11/99)~~ ~~(3/25/04, State Only)~~ ~~WAC 173-400-040(1)(a) & (b) (9/20/93)~~ ~~Once EPA deletes the 9/20/93 version of the WAC from the PSCAA SIP, only the 3/25/04 version of Reg. I, Section 9.03 will apply.~~	Shall not emit air contaminants which exhibit greater than 20% opacity for a period or periods aggregating more than 3 minutes in any hour	Condition No.1.~~16~~ 14 Opacity Monitoring	Ecology Method 9A
1.3	PSCAA Reg I: 9.09 (6/1/98) ~~(4/9/98)~~	Shall not emit particulate matter in excess of 0.05 gr/dscf from equipment used in a manufacturing process	Condition No.1.~~16~~ 14 Opacity Monitoring	Puget Sound Clean Air Agency Method 5
1.4	PSCAA Reg I: 9.09 (6/1/98) ~~(4/9/98)~~	Shall not emit particulate matter in excess of 0.05 gr/dscf corrected to 7% O_2 from fuel burning equipment	Condition No.1.~~16~~ 14 Opacity Monitoring	Puget Sound Clean Air Agency Method 5
~~1.5~~	~~WAC 173-400-060 (3/22/91)~~ ~~Once EPA deletes the 3/22/91 version of the WAC from the PSCAA SIP, only Reg. I, Section 9.09 will apply~~	~~Shall not emit particulate matter in excess of 0.1 gr/dscf from general process units~~	~~Condition No.1.16 Opacity Monitoring~~	~~EPA Method 5~~
~~1.6~~	~~WAC 173-400-050(1)~~ ~~WAC 173-400-050(3) (3/22/91)~~ ~~Once EPA deletes the 3/22/91 version of the WAC from the PSCAA SIP, only Reg. I, Section 9.09 will apply~~	~~Shall not emit particulate matter in excess of 0.1 gr/dscf corrected to 7% O_2 from combustion and incineration units~~	~~Condition No.1.16 Opacity Monitoring~~	~~EPA Method 5~~

Reqmt No.	Enforceable Requirement	Requirement Paraphrase (Information Only)	Compliance Method	Reference Test Method (See Section 7)
Fugitive Dust Emissions Standards				
1.~~15~~ 15	PSCAA Reg. I: 9.15 (4/17/99) ~~(3/11/99)~~ ~~WAC 173-400-040(8)(a) (9/20/93)~~ ~~*Once EPA deletes the 9/20/93 version of the WAC from the PSCAA SIP, only Reg. I, Section 9.15 will apply*~~	Shall not cause or allow visible emissions of fugitive dust unless reasonable precautions are employed to minimize the emissions. Reasonable precautions include but are not limited to, the following: (1) The use of control equipment, enclosures, and wet (or chemical) suppression techniques, as practical, and curtailment during high winds; (2) Surfacing roadways and parking areas with asphalt, concrete, or gravel; (3) Treating temporary, low-traffic areas (e.g., construction sites) with water or chemical stabilizers, reducing vehicle speeds, constructing pavement or rip rap exit aprons, and cleaning vehicle undercarriages before they exit to prevent the track-out of mud or dirt onto paved public roadways; or (4) Covering or wetting truck loads or allowing adequate freeboard to prevent the escape of dust-bearing materials. Compliance with the provisions of this section shall not relieve the permittee of the responsibility of complying with Regulation I, Section 9.11	Condition No. 1.~~15~~ 15 Facility-wide Inspections Condition No. 1.~~16~~ 16 Complaint Response	Not applicable
1.~~16~~ 16	~~WAC 173-400-040(3) (9/20/93)~~ ~~*WAC 173-400-040(4) (7/1/16, State Only)*~~ *WAC 173-400-040(4)(a)* (9/16/18) ~~*(7/1/16) will become federally enforceable upon adoption into the SIP and will replace the 9/20/93 version of WAC 173-400-040(3).*~~	If engaging in materials handling, construction, demolition or any other operation which is a source of fugitive emissions, shall take reasonable precautions to prevent the release of air contaminants from the operation.	Condition No. 1.~~15~~ 15 Facility-wide Inspections Condition No. 1.~~16~~ 16 Complaint Response	Not applicable

Reqmt No.	Enforceable Requirement	Requirement Paraphrase (Information Only)	Compliance Method	Reference Test Method (See Section 7)
Health, Welfare and Nuisance Standards				
1.~~8~~ 7	*PSCAA Reg I: 9.11 (4/17/99)* ~~*(3/11/99)*~~ ~~*(State Only)*~~ ~~WAC 173-400-040(5) (9/20/93)~~ ~~*Once EPA deletes the 9/20/93 version of the WAC from the PSCAA SIP, only Reg. I, Section 9.11 will apply*~~	Shall not cause or allow the emission of any air contaminant in sufficient quantities and of such characteristics and duration as is, or is likely to be, injurious to human health, plant or animal life, or property, or which unreasonably interferes with enjoyment of life and property	Condition No. 1.~~7~~ 15 Facility-wide Inspections Condition No. 1.~~8~~ 16 Complaint Response	Not applicable
1.~~10~~ 8	WAC 173-400-040(5) *(~~4/1/11~~ 9/16/18, State Only)*	Shall use recognized good practice and procedures to reduce to a reasonable minimum odors which may unreasonably interfere with any other property owners' use and enjoyment of their property.	Condition No. 1.~~7~~ 15 Facility-wide Inspections Condition No. 1.~~8~~ 16 Complaint Response	Not applicable
1.~~11~~ 9	*WAC 173-400-040(3) (~~4/1/11,~~ 9/16/18 State Only)*	Shall not deposit particulate matter beyond the property boundary in sufficient quantity to interfere unreasonably with the use and enjoyment of the property	Condition No. 1.~~7~~ 15 Facility-wide Inspections Condition No. 1.~~8~~ 16 Complaint Response	Not applicable
SO_2 Standard				
1.~~12~~ 10	PSCAA Reg I: 9.07 ~~(5/19/94)~~ ~~(4/14/94)~~ ~~WAC 173-400-040(6), first paragraph only (9/20/93)~~ ~~*Once EPA deletes the 9/20/93 version of the WAC from the PSCAA SIP, only Reg. I, Section 9.07 will apply*~~	Shall not emit SO_2 in excess of 1,000 ppmv (dry), 1-hour average (corrected to 7% O_2 for fuel burning equipment)	No monitoring required	EPA Method 6C
Hydrochloric Acid Standard				
1.~~13~~ 11	*PSCAA Reg. I: 9.10(a) (6/9/~~9888~~) (State Only)*	Shall not emit hydrochloric acid in excess of 100 ppm (dry), 1-hour average corrected to 7% O_2 for combustion sources	No monitoring required	EPA Method 26 or 26A

Reqmt No.	Enforceable Requirement	Requirement Paraphrase (Information Only)	Compliance Method	Reference Test Method (See Section 7)
Operations and Maintenance Standards				
1.~~14~~ 12	PSCAA Reg. I: 9.20(b) (6/9/88)	Shall maintain equipment as defined in Regulation I, Section 1.07 or control equipment not subject to PSCAA Reg I Article 6 in good working order	Condition No. 1.~~17~~ 15 Facility-wide Inspections Condition Nos. 1.~~20~~ 18 – 1.~~21~~ 19 O&M Plan Requirements	Not applicable
1.~~18~~ 13	PSCAA Reg I: 7.09(b) (2/1/17) ~~(9/10/98)~~ ~~(12/15/16) (State Only)~~	Shall develop and implement an O & M Plan to assure continuous compliance with Puget Sound Clean Air Agency Regulations I, II and III. The plan shall reflect good industrial practice. It shall include the elements described in Reg. I: 7.09(b). Shall review the O&M Plan at least annually and update it as needed to reflect any changes in good industrial practice. The specific provisions of the O&M Plan shall not be deemed part of this permit.	Condition Nos. 1.~~20~~ 18 – 1.~~21~~ 19 O&M Plan Requirements	Not applicable

COMPLIANCE METHODS

Opacity Monitoring

1.~~16~~ 14 At least once per calendar quarter, the permittee shall conduct inspections of the facility for visible emissions. Inspections are to be performed while the equipment is in operation during daylight hours. If visible emissions other than uncombined water are observed, the permittee shall initiate corrective action as soon as possible, but no later than 24 hours after the initial observation until there are no visible emissions or, alternatively, record the opacity using the reference test method or shut down the unit or activity until it can be repaired. The permittee shall keep records of the inspections, including date and time of inspection, the name or ID of the person conducting inspection, the results of the inspection, and any corrective action conducted.

Failure to implement one of the response actions described above within 24 hours of the initial observation shall be reported as a deviation under Condition 5.5.

[WAC 173-401-615(1)(b) and (3)(b)]

Facility-Wide Inspections

1.~~17~~ 15 At least once per calendar quarter, the permittee shall conduct a facility-wide inspection, including the following:

a. Examine the general state of compliance with the general applicable requirements, including a check of records to determine if complaints have been received and

responded to as specified in Condition 1.186;

b. Inspect the facility for odor bearing contaminants and emissions of any air contaminant in sufficient quantities and of such characteristics and duration as is, or is likely to be, injurious to human health, plant or animal life, or property, or which unreasonably interfere with enjoyment of life and property;

c. Examine compliance with the indoor spray coating requirements in Regulation I, Section 9.16(c);

d. Inspect the facility for fugitive dust and track-out while conducting activities, such as construction, that are likely to generate fugitive dust or track-out; and

e. Evaluate the general effectiveness of the Operation & Maintenance (O&M) Plan.

Inspections of equipment and operations shall be conducted during daylight hours. The permittee shall initiate corrective action for any problems identified by these inspections as soon as possible, but no later than within 24 hours of identification or shut down the unit or activity until the problem can be corrected. The permittee shall keep records of the inspections, including date and time of inspection, the name or ID of the person conducting inspection, the results of the inspection, any corrective action conducted, and whether complaints have been received.

Failure to implement one of the response actions described above within 24 hours of the initial observation shall be reported as a deviation under Condition 5.5.

[WAC 173-401-615(1)(b) and (3)(b)]

Complaint Response

1.~~18~~ 16 The permittee shall record and investigate air pollution complaints as soon as possible, but no later than three days after receipt. The permittee shall identify complaints regarding these emissions as follows:

a. Any emissions that are, or likely to be, injurious to human health, plant or animal life, or property, or which unreasonably interfere with enjoyment of life and property; or

b. Any emissions from fallout; or

c. Any track-out onto paved roads open to the public; or

d. Any emissions of odor-bearing air contaminants; or

e. Other emissions.

The permittee shall investigate the complaint and determine if there was noncompliance with an applicable requirement of this permit. If it is determined to be noncompliance, the permittee shall initiate corrective action for the problem as soon as possible but no later than within 24 hours of determination or shut down the noncompliant operation until it is repaired or corrected. Failure to implement corrective action or else shut down the unit/activity within 24 hours of initial observation of noncompliance shall be reported as a deviation under Condition 5.5.

Records for all complaints received concerning odor, fugitive emissions or nuisance must contain the following information:

a. The date and time of the complaint,

b. The name of the person complaining, if known,

c. The nature of the complaint, and

d. The date, time and nature of any corrective action taken.

[WAC 173-401-615(1)(b)]

Maintenance and Repair of Insignificant Emission Units

1.~~19~~ 17 The permittee shall use good industrial practices to maintain insignificant emission units and equipment not listed in this permit. For such equipment, the permittee shall also promptly repair defective equipment. Good industrial practices may include following the manufacturer's operations manual or an equipment operations schedule, minimizing emissions until the repairs can be completed and taking measures to prevent recurrence of the problem.

[WAC 173-401-615(1)(b)]

Operation and Maintenance (O&M) Plan Requirements

1.~~20~~ 18 The permittee's O&M Plan shall include procedures specifying how the permittee will assure continuous compliance with Puget Sound Clean Air Agency Regulations I, II and III. For insignificant emission units, the O&M Plan shall refer to the requirements stated in Condition 1.~~19~~ 17 of this permit. The plan shall reflect good industrial practice. In most instances, following the manufacturer's operations manual or equipment operational schedule, minimizing emissions until repairs can be completed and taking measures to prevent a recurrence of the problem may be considered good industrial practice. Determination of whether good industrial practice is being used will be based on available information such as, but not limited to, monitoring results, opacity observations, review of operations and maintenance procedures, and inspections of the emission unit or equipment. The permittee shall use the results of the inspections required by this permit in its annual review of the O&M Plan. The specific provisions of the O&M Plan, other than those required by this permit, shall not be deemed part of this permit.

1.~~21~~ 19 The permittee shall document all inspections, tests and other actions required by the O&M Plan, including the name or ID of the person who conducted the inspection, tests or other actions; and the date and the results of the inspection, tests or other actions including corrective actions. The permittee shall maintain records of all inspections, tests, and other actions required by the O&M Plan on site and available for Puget Sound Clean Air Agency review.

[Puget Sound Clean Air Agency, Regulation I, Section 7.09(b)]

B. Facility-wide VOC and HAP Emission Limits

The requirements in Table 2 and the associated compliance methods apply facility-wide.

Table 2. Facility-wide VOC and HAP Emission Limits

Reqmt No.	Enforceable Requirement	Requirement Paraphrase (Information Only)	Compliance Method	Reference Test Method (See Section 7)
Facility-wide VOC and HAP emission limits				
1.22 20	Order of Approval No. 11587 Condition No. 1 (1/16/19)	Facility-wide emissions of VOCs as defined in 40 CFR 51.100 shall not exceed 383 tons during any consecutive 12-month period.	Condition Nos. 1.26 - 1.26 26 Monthly VOC Calculations 24	Not applicable
1.23 21	Order of Approval No. 11587 Condition No. 2 (1/16/19)	Facility-wide emissions of HAPs shall not exceed 9.8 tons of any single HAP or 24.5 tons of total HAP combined during any consecutive 12-month period.	Condition Nos. 1.29 - 1.31 29 Monthly HAP Calculations 27	Not applicable
1.24 22	Order of Approval No. 11587 Condition No. 3 (1/16/19)	Acetone and other negligibly reactive compounds may be used as substitutes for HAPs and VOCs in topcoats, primers, gun wash thinners, and other products. Negligibly reactive compounds do not need to be counted when calculating VOC content of coatings	No monitoring required 30	Not applicable
1.25 23	Order of Approval No. 11587 Condition No. 8 (1/16/19)	The permittee shall not consume more than 421 million standard cubic feet of natural gas during any consecutive 12-month period.	1.32 Fuel Combustion Monitoring Plan	Not applicable

COMPLIANCE METHODS

Monthly VOC Calculations

1.~~26~~ 24 The permittee shall track the usage and volatile organic compound (VOC) content of all VOC-containing materials used in the manufacturing process at the facility that contribute to VOC emissions. Monthly purchase records can be used as a surrogate for monthly usage.

[PSCAA Order No. 11587, Condition 4, (1/16/19)]

1.~~27~~ 25 No later than 60 days after the end of each month, the permittee shall calculate and record monthly emissions and emissions over the previous consecutive 12-month period of total VOC. The owner or operator may choose to subtract the amount of VOC due to disposal or recycling of material off-site if records are maintained to technically justify the calculation. Acceptable records include safety data sheets, product data sheets, invoices, shipping papers, sampling results, and hazardous waste manifests.

[PSCAA Order No. 11587, Condition 6, (1/16/19)]

1.~~28~~ 26 The permittee shall notify the Puget Sound Clean Air Agency in writing, as specified in Condition 5.9, within 60 days after the end of each consecutive 12-month period if, during that period, emissions of VOC exceed 345 tons. The report shall include emissions data for the time period for which these thresholds were exceeded.

[PSCAA Order No. 11587, Condition 11, (1/16/19)]

Monthly HAP Calculations

1.~~29~~ 27 The permittee shall track the usage and hazardous air pollutant (HAP) content of all HAP-containing materials used in the manufacturing process at the facility that contribute to HAP emissions. Monthly purchase records can be used as a surrogate for monthly usage.

[PSCAA Order No. 11587, Condition 5, (1/16/19)]

1.~~30~~ 28 No later than 60 days after the end of each month, the permittee shall calculate and record monthly emissions and emissions over the previous consecutive 12-month period for each individual HAP and total HAP. The owner or operator may choose to subtract the amount of HAP due to disposal or recycling of material off-site if records are maintained to technically justify the calculation. Acceptable records include safety data sheets, product data sheets, invoices, shipping papers, sampling results, and hazardous waste manifests.

[PSCAA Order No. 11587, Condition 6, (1/16/19)]

1.~~31~~ 29 The permittee shall notify the Puget Sound Clean Air Agency in writing, as specified in Condition 5.9, within 60 days after the end of each consecutive 12-month period if, during that period, emissions of any single HAP exceed 9.0 tons or emissions of total HAP exceed 22.5 tons. The report shall include emissions data for the time period for which these thresholds were exceeded.

[PSCAA Order No. 11587, Condition 11, (1/16/19)]

Fuel Combustion Monitoring Plan

1.~~32~~ 30 The permittee shall monitor and record natural gas usage on a monthly basis, and make these records available to Agency personnel upon request.

[PSCAA Order No. 11587, Condition 9, (1/16/19)]

Section 2: Emission Unit Specific Applicable Requirements

The requirements in Section 2 apply only to the specific emission units or activities cited. However, the requirements in Section 1 also apply to these emission units and activities. If a requirement in Section 1 is repeated in this section, then the compliance method specified in this section supersedes the compliance method specified in Section 1.

The applicable requirement tables in Section 2 (Tables 3 through 12) list the citation for the "enforceable requirement" and the adoption or effective date in the second column. All requirements are federally enforceable unless they are identified as "*State Only*".

The third column in the tables is a brief description of the enforceable requirement and is not enforceable.

The fourth column identifies the "Compliance Method" which includes monitoring, recordkeeping and reporting obligations the permittee must conduct to comply with the permit. The compliance methods are listed in conditions below the applicable requirements tables. Following the compliance method is an enforceable requirement of this permit. Inclusion of these requirements is in accordance with WAC 173-401-605(1) and WAC 173-401-615(1) and (2). The "Reference Test Method" is listed in the fourth column if one applies. This is the test method to be used when a source test is required to determine compliance. In some cases where the applicable 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.

In the event of conflict or omission between the information contained in the fourth column of the tables and the actual statute or regulation cited in the third column, 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.

Emission units and activities in place at the time of permit issuance are listed below. These do not include insignificant emission units (See Section 9 of this permit). The process description includes the location of the emission units at time of permit issuance, but emission units may be relocated throughout the site without modifying the operating permit. However, new source review requirements may apply if equipment is modified or reconstruction or for the replacement or substantial alteration of control equipment (see Section 4 of this permit).

Summary of Emission Units

Emission Unit	Name	Description
EU-1	Assembly Operations; Highway and Off-Highway Trucks	This emission unit consists of activities associated with assembling the trucks and some of their components. Assembly operations currently take place inside Buildings 1 and 6. The assembly operations may include the use of materials such as lubricants, glues, adhesives, greases, sealants, and solvents - both hand and spray applied with aerosol cans. Ventilation hoods with no air pollution controls may be included in these areas for worker safety and comfort but these are insignificant emission units.
EU-2	Materials Work	This emission unit consists of activities associated with truck component fabrication in Building 1. Motor vehicle and mobile equipment coating operations, including spray coating, are not included under this emission unit. Materials used to aid fabrication may include lubricants, coolants, greases, adhesives, and cleaners. This emission unit includes welding equipment and welding dust collectors that recirculate filtered air back into the factory. There is also one welding fume collector located in the Off-Highway area and one in the Maintenance area that are vented to the outside. Parts cleaners using a low VOC product operate within this emission unit and are considered insignificant emissions units.
EU-3	Surface Prep: Truck Components	This emission unit consists of activities associated with preparing truck components for coating operations. Motor vehicle and mobile equipment coating operations, including spray coating, are not included under this emission unit. Activities currently are located in Building 1. Activities in surface preparation include assembly, joining, filling, grinding, sanding, and washing and sealing. The Cab Washer and Cab Washer Dry-off oven are insignificant emission units. This emission unit includes: • Two Prep Booths and a Vacuum System with Dust Collection; • Chassis Dry Filter Prep Booth and Prep Seal and Wash Booth (dry filter on prep seal part of booth); • Bump and Grind Prep Booth (Dry Filter); • Sand and Repair Prep Booth (Dry Filter); and • Cab Prime Sand/Prep Booth (Dry Filter).
EU-4	Coating Operations: Truck Components & Chassis	This emission unit includes cleaning and surface coating activities of truck components. Currently, it is located in Building 1 and includes cleaning and surface coating of truck chassis. This emission unit includes: • One Truck Chassis Dry Filter Paint Booth with Paint Drying Oven.
EU-5	Coating Operations: Truck Components	This emission unit includes cleaning and surface coating activities of truck components. Currently, it is located in Building 1 and includes cleaning and surface coating of truck components such as doors, fenders, hoods, wheels, bumpers, cabs, sleepers and integrated units. The emission unit includes: • Three water wash paint booths, • One dry filter paint booth, • Two paint drying ovens; and • One paint flash tunnel.

Emission Unit	Name	Description
EU-6	Coating Operations: Highway and Off-Highway Trucks And Touch-Up	This emission unit includes cleaning and surface coating activities of highway and off-highway completed trucks and truck components. Currently, it is located in Building 1 and covers painting and touch-up which includes activities such as stripping, filling, surface preparation, cleaning and surface coating of trucks, and touching up of completed highway and off-highway trucks. The emission unit includes two dry filter paint booths, one of which can also function as a drying oven.
EU-7	Coating Mix/Solvent System	This emission unit includes the storage, thinning, tinting, and packaging of coating materials for application on truck components, completed trucks and other maintenance coating needs, as well as the solvent and activator storage and distribution systems. The paint mix room is located in Building 1 and includes ventilation with no pollution control equipment. Solvent is delivered by piping system from the storage tank in Building 2 to the paint mix room in Building 1, then distributed to each of the coating operations emission units. At each solvent delivery station, used solvent is collected and piped to the waste solvent tank located in Building 2. In Building 2, in the waste processing area, clean solvent is reclaimed from the waste stream and reused. Paint components and activator are received in various size containers up to bulk storage totes and are transferred to use containers and storage tanks of variable size, then distributed to each of the coating operations emission units.
EU-8	Gas Fueled Equipment	This emission unit includes all air, water and other medium heaters that are fueled by natural gas and are larger than applicable size thresholds making them significant sources. This includes makeup air unit (MAUs) and air supply houses (ASHs) larger than 5 MMBtu/hr. Currently, natural gas is the primary fuel; however, other petroleum-based fuels may be used including propane, butane, and liquid natural gas.
EU-9	Emergency Engines	This emission unit includes equipment that is necessary for emergency situations and includes an existing 380 HP emergency electrical generator and an existing 235 HP fire pump. Both engines installed prior to 1994. Currently, diesel is the primary fuel; however, other alternative fuels may be used.

A. Facility-wide Surface Coating Operations

The requirements in Table 3 and the associated compliance methods apply facility-wide to surface coating operations.

Table 3. Applicable Requirements Related to Facility-wide Surface Coating Operations

Reqmt No.	Enforceable Requirement	Requirement Paraphrase (Information Only)	Compliance Method
General Requirements for Indoor Spray Coating Operations			
2.1	PSCAA Reg. I, 9.16(b) (12/2/10) ~~(7/12/01)~~ ~~(10/28/10, State Only)~~	The following activities are exempt from the provisions of Reg I: 9.16(c) in Condition 2.2. Persons claiming any of the exemptions shall have the burden of demonstrating compliance: (1) Application of architectural or maintenance coatings to stationary structures. (2) Aerospace coating operations subject to 40 CFR Part 63 Subpart GG, including all activities and materials listed in 40 CFR 63.741(f). (3) Use of HVLP guns in certain situations described in Reg I: 9.16(b)(3)(A) through (E). (4) Use of air brush spray equipment with 0.5 to 2.0 CFM airflow and 2 fluid ounce or less cup capacity. (5) Use of hand-held aerosol spray cans with 1 quart or less capacity. (6) Indoor application of automotive undercoating materials using organic solvents with flash points in excess of 100F.	No monitoring required
2.2	PSCAA Reg. I, 9.16(c) (12/2/10) ~~(7/12/01)~~ ~~(10/28/10, State Only)~~	Unlawful to allow spray-coating inside a structure, or spray-coating of any motor vehicles or components, unless the spray-coating is conducted inside an enclosed spray area employing paint arresters or water-wash curtains to control overspray. All emissions shall be vented through an unobstructed vertical exhaust vent.	Condition No. 1.~~7~~15 Facility-wide Inspections
VOC Content Limits for Motor Vehicle and Mobile Equipment Coating Operations			
2.3	Order of Approval 11587, Condition 7 (1/16/19)	Shall not apply coatings with a VOC content (excluding water and negligibly reactive compounds) which exceed the following limits: (a) Topcoat Paints: 3.5 lb/gal (b) Primers: 3.5 lb/gal (c) Specialty Coatings: 7.0 lb/gal. The above VOC coating limits do not apply to coatings applied with hand-held aerosol spray cans with one quart or less capacity or with air brush spray equipment with 0.5 to 2.0 CFM airflow and 2 fluid ounce or less cup capacity.	Condition No. 2.7 Chemical Procurement Information Sheet (CPIS) System Reference Test Method: EPA Method 24

<table>
<tr><th>Reqmt No.</th><th>Enforceable Requirement</th><th>Requirement Paraphrase (Information Only)</th><th>Compliance Method</th></tr>
<tr><td>2.4</td><td>PSCAA Reg. II, 3.04(a) (7/24/03)</td><td>It shall be unlawful for original equipment manufacturers to apply any coating with a VOC content in excess of the following limits to motorized vehicles, their parts and components, or equipment designed to be pulled by motorized vehicles:
<table><tr><th rowspan="2">Type of Coating</th><th colspan="2">VOC Content (excluding water)</th></tr><tr><th>Grams/Liter</th><th>(Lbs/Gal)</th></tr><tr><td>Pretreatment Wash Primer</td><td>780</td><td>(6.5)</td></tr><tr><td>Precoat</td><td>780</td><td>(6.5)</td></tr><tr><td>Primer Primer Surfacer</td><td>720</td><td>(6.0)</td></tr><tr><td>Primer Sealer</td><td>720</td><td>(6.0)</td></tr><tr><td>Topcoat</td><td>720</td><td>(6.0)</td></tr><tr><td>Metallic Iridescent Topcoat</td><td>720</td><td>(6.0)</td></tr></table></td><td>Condition No. 2.7 Chemical Procurement Information Sheet (CPIS) System
Condition No. 2.8 Specialty Coating Tracking
Reference Test Method: EPA Method 24</td></tr>
<tr><td>2.5</td><td>PSCAA Reg. II, 3.04(b) (7/24/03)</td><td>It shall be unlawful to apply any specialty coating with a VOC content in excess of 840 grams/liter (7.0 lb/gal), excluding water. Use of all specialty coatings except antiglare/safety coatings shall not exceed 5.0% of all coatings applied on a monthly basis. Specialty coatings are coatings that are necessary due to unusual job performance requirements and whose VOC content exceeds 630 grams/liter.</td><td>Condition No. 2.7 Chemical Procurement Information Sheet (CPIS) System
Condition No. 2.8 Specialty Coating Tracking
Reference Test Method: EPA Method 24</td></tr>
<tr><td>2.6</td><td>PSCAA Reg. II, 3.04(c) (7/24/03)</td><td>VOC content of each regulated coating must be available to Agency personnel upon request.</td><td>Condition No. 2.7 Chemical Procurement Information Sheet (CPIS) System
Condition No. 2.8 Specialty Coating Tracking
Reference Test Method: EPA Method 24</td></tr>
</table>

COMPLIANCE METHODS

Chemical Procurement Information Sheet (CPIS) System

2.7 The permittee shall screen each material purchased for use at the facility using the CPIS system. The permittee shall review the manufacturer's supplied information, such as the Safety Data Sheet or Product Data Sheet, for each material prior to receiving the material on-site to determine the legality of the VOC-content for the product use and its impact on the overall site HAP and VOC emissions. For coatings that are activated via a plural component paint mix system prior to the spray gun, the permittee shall obtain an annual certification from the vendor which may consist of a letter (sent via mail or email); or a spreadsheet of formulations; or similar information stating or showing that all the formulations supplied to the facility meet the following limits:

a. For non-specialty coatings unless applied with hand-held aerosol spray cans with one quart or less capacity or with air brush spray equipment with 0.5 to 2.0 CFM airflow and 2 fluid ounce or less cup capacity: 3.5 pounds per gallon;

b. For primer, primer surfacer, primer sealer, topcoat or metallic iridescent topcoat applied with hand-held aerosol spray cans with one quart or less capacity or with air brush spray equipment with 0.5 to 2.0 CFM airflow and 2 fluid ounce or less cup capacity: 6.0 pounds per gallon;

c. For pretreatment wash primer or precoat applied with hand-held aerosol spray cans with one quart or less capacity or with air brush spray equipment with 0.5 to 2.0 CFM airflow and 2 fluid ounce or less cup capacity: 6.0 pounds per gallon; and

d. For specialty coatings defined as coatings necessary due to unusual job performance requirements and whose VOC content exceeds 5.25 pounds per gallon: 7.0 pounds of VOC per gallon.

The permittee shall maintain CPIS System records for each material including the VOC content and applicable VOC limit. Records shall be reviewed on a monthly basis, and signed and dated by a Kenworth employee. All records shall be made available for inspection by Agency staff upon request.

[WAC 173-401-615(1)(b)]

Specialty Coating Tracking

2.8 The permittee shall record on a monthly basis the volume and VOC content of the specialty coatings applied at the facility. Within 60 days after the end of each calendar month that specialty coatings were used, with the exception of antiglare/safety coatings, the permittee shall calculate the specialty coating usage as a percentage of total coating usage for each month that it was used.

[WAC 173-401-615(1)(b)]

B. Area Specific Surface Coating Operations

1. Emission Unit No. 1: Assembly Operations: Highway and Off-Highway Trucks

The requirements in Table 4 apply to Emission Unit No. 1. This emission unit consists of activities associated with assembling the trucks and some of their components. Assembly operations currently take place inside Buildings 1 and 6. Emission units may be relocated throughout the site without modifying the operating permit. However, new source review requirements may apply if equipment is modified or reconstructed, or for the replacement or substantial alteration of control equipment (see Section 4 of this permit). The assembly operations may include the use of materials such as lubricants, glues, adhesives, greases, sealants, and solvents - both hand and spray applied with aerosol cans. Ventilation hoods with no air pollution controls may be included in these areas for worker safety and comfort but these are insignificant emission units.

Motor vehicle and mobile equipment coating operations, including spray coating, are subject to the requirements in Table 3.

Table 4. Applicable Requirements Related to Assembly Operations: Highway and Off-Highway Trucks

Reqmt No.	Enforceable Requirement	Requirement Paraphrase (Information Only)	Compliance Method
2.9	PSCAA Reg. II, 3.04(d) (7/24/03)	VOC-containing material shall be applied to any motorized vehicles, their parts and components, or equipment designed to be pulled by motorized vehicles using one of the following methods: • High volume, low pressure (0.1 to 10 psig air pressure for atomization) spray equipment, • Electrostatic spray equipment, • Flow coat, • Dip coat, • Brush coat, • Hand-held aerosol cans, • Roll coat, or • Air brush.	Condition No. 2.36 Spray Coating Inspections
2.10	PSCAA Reg. II, 3.04(e) (7/24/03)	Any VOC-containing material used for the cleanup of spray equipment, including paint lines, shall be contained and collected in closed containers.	Condition No. 2.37 Work Practice Monitoring Condition No. 2.38 Spray Coating Training Program
2.11	PSCAA Reg. II, 3.04(f) (7/24/03)	Closed containers shall be used for storage or disposal of VOC-containing materials. Such containers and tanks shall be kept closed except when being cleaned or when materials are being added, mixed, or removed. Closed containers for solvent rag or paper disposal are required. Empty containers as defined in WAC 173-303-160 are exempt	Condition No. 2.37 Work Practice Monitoring Condition No. 2.38 Spray Coating Training Program
2.12	PSCAA Reg I: 9.20 (6/9/88) RCW 70.94.152(7) *1996 (State Only)*	All equipment must be maintained in good working order.	Condition No. 1.~~17~~15 Facility-wide Inspections Condition Nos. 1.~~20~~18 – 1.~~21~~19 O&M Plan Requirements Condition No. 2.36 Spray Coating Inspections

2. Emission Unit No. 2: Materials Work

The requirements in Table 5 apply to Emission Unit No. 2. This emission unit consists of activities associated with truck component fabrication in Building 1. Motor vehicle and mobile equipment coating operations, including spray coating, are not currently included under this emission unit. Emission units may be relocated throughout the site without modifying the operating permit. However, new source review requirements may apply if equipment is modified or reconstructed, or for the replacement or substantial alteration of control equipment (see Section 4 of this permit) and approved motor vehicle and mobile equipment coating operations, including spray coating, would be subject to the requirements in Table 3. Materials used to aid fabrication may include lubricants, coolants, greases, adhesives, and cleaners. This emission unit includes welding equipment and welding dust collectors that recirculate filtered air back into the factory. There is also one welding fume collector located in the Off-Highway area and one in the Maintenance area that are vented to the outside. Parts cleaners using a low VOC product operate within this emission unit and are considered insignificant emissions units.

Table 5. Applicable Requirements Related to Material Work

Reqmt No.	Enforceable Requirement	Requirement Paraphrase (Information Only)	Compliance Method
Motor Vehicle and Mobile Equipment Coating Operations			
2.13	PSCAA Reg. II, 3.04(e) (7/24/03)	Any VOC-containing material used for the cleanup of spray equipment, including paint lines, shall be contained and collected in closed containers.	Condition No. 2.37 Work Practice Monitoring Condition No. 2.38 Spray Coating Training Program
2.14	PSCAA Reg. II, 3.04(f) (7/24/03)	Closed containers shall be used for storage or disposal of VOC-containing materials. Such containers and tanks shall be kept closed except when being cleaned or when materials are being added, mixed, or removed. Closed containers for solvent rag or paper disposal are required. Empty containers as defined in WAC 173-303-160 are exempt	Condition No. 2.37 Work Practice Monitoring Condition No. 2.38 Spray Coating Training Program
2.15	PSCAA Reg I: 9.09 (6/1/98) ~~(4/9/98)~~	Shall not emit particulate matter in excess of 0.05 gr/dscf from equipment used in a manufacturing process	Condition No 2.39 Dust Collector Inspections
2.16	PSCAA Reg I: 9.20 (6/9/88) RCW 70.94.152(7) *1996 (State Only)*	All equipment must be maintained in good working order.	Condition No. 1.~~17~~15 Facility-wide Inspections Condition Nos. 1.~~20~~18 – 1.21~~19~~ O&M Plan Requirements

3. Emission Unit No. 3: Surface Preparation: Truck Components

The requirements in Table 6 apply to Emission Unit No. 3. This emission unit consists of activities associated with preparing truck components for coating operations. Motor vehicle and mobile equipment coating operations, including spray coating, are not currently included under this emission unit. Activities currently are located in Building 1. Emission units may be relocated throughout the site without modifying the operating permit. However, new source review requirements may apply if equipment is modified or reconstructed, or for the replacement or substantial alteration of control equipment (see Section 4 of this permit) and approved motor vehicle and mobile equipment coating operations, including spray coating, would be subject to the requirements in Table 3. Activities in surface preparation include assembly, joining, filling, grinding, sanding, and washing and sealing. The Cab Washer and Cab Washer Dry-off oven are insignificant emission units. This emission unit includes:

- Two Prep Booths and a Vacuum System with Dust Collection;
- Chassis Dry Filter Prep Booth and Prep Seal and Wash Booth (dry filter on prep seal part of booth);
- Bump and Grind Prep Booth (Dry Filter);
- Sand and Repair Prep Booth (Dry Filter); and
- Cab Prime Sand/Prep Booth (Dry Filter).

Table 6. Applicable Requirements Related to Surface Preparation

Reqmt No.	Enforceable Requirement	Requirement Paraphrase (Information Only)	Compliance Method
Motor Vehicle and Mobile Equipment Coating Operations			
2.17	PSCAA Reg. II, 3.04(e) (7/24/03)	Any VOC-containing material used for the cleanup of spray equipment, including paint lines, shall be contained and collected in closed containers.	Condition No. 2.37 Work Practice Monitoring Condition No. 2.38 Spray Coating Training Program
2.18	PSCAA Reg. II, 3.04(f) (7/24/03)	Closed containers shall be used for storage or disposal of VOC-containing materials. Such containers and tanks shall be kept closed except when being cleaned or when materials are being added, mixed, or removed. Closed containers for solvent rag or paper disposal are required. Empty containers as defined in WAC 173-303-160 are exempt	Condition No. 2.37 Work Practice Monitoring Condition No. 2.38 Spray Coating Training Program
2.19	PSCAA Reg I: 9.09 (6/1/98) ~~(4/9/98)~~	Shall not emit particulate matter in excess of 0.05 gr/dscf from equipment used in a manufacturing process	Condition No 2.39 Dust Collector Inspections
2.20	PSCAA Reg I: 9.20 (6/9/88) RCW 70.94.152(7) *1996 (State Only)*	All equipment must be maintained in good working order.	Condition No. 1.17 15 Facility-wide Inspections Condition Nos. 1.20 – 1.21 18 19 O&M Plan Requirements

4. Emission Unit No. 4: Coating Operations: Truck Components & Chassis

The requirements in Table 7 apply to Emission Unit No. 4. This emission unit includes cleaning and surface coating activities of truck components. Currently, it is located in Building 1 and includes cleaning and surface coating of truck chassis. Emission units may be relocated throughout the site without modifying the operating permit. However, new source review requirements may apply if equipment is modified or reconstructed, or for the replacement or substantial alteration of control equipment (see Section 4 of this permit). This emission unit includes:

- One Truck Chassis Dry Filter Paint Booth with Paint Drying Oven.

Motor vehicle and mobile equipment coating operations, including spray coating, are subject to the requirements in Table 3.

The paint solvent system delivers solvent to this emission unit area for cleaning purposes; however, it is included in its own emission unit, EU-7.

Table 7. Applicable Requirements Related to Coating Operations: Truck Components & Chassis

Reqmt No.	Enforceable Requirement	Requirement Paraphrase (Information Only)	Compliance Method
2.21	PSCAA Reg. II, 3.04(d) (7/24/03)	VOC-containing material shall be applied to any motorized vehicles, their parts and components, or equipment designed to be pulled by motorized vehicles using one of the following methods: • High volume, low pressure (0.1 to 10 psig air pressure for atomization) spray equipment, • Electrostatic spray equipment, • Flow coat, • Dip coat, • Brush coat, • Hand-held aerosol cans, • Roll coat, or • Air brush.	Condition No. 2.36 Spray Coating Inspections
2.22	PSCAA Reg. II, 3.04(e) (7/24/03)	Any VOC-containing material used for the cleanup of spray equipment, including paint lines, shall be contained and collected in closed containers.	Condition No. 2.37 Work Practice Monitoring Condition No. 2.38 Spray Coating Training Program
2.23	PSCAA Reg. II, 3.04(f) (7/24/03)	Closed containers shall be used for storage or disposal of VOC-containing materials. Such containers and tanks shall be kept closed except when being cleaned or when materials are being added, mixed, or removed. Closed containers for solvent rag or paper disposal are required. Empty containers as defined in WAC 173-303-160 are exempt	Condition No. 2.37 Work Practice Monitoring Condition No. 2.38 Spray Coating Training Program
2.24	PSCAA Reg I: 9.20 (6/9/88) RCW 70.94.152(7) *1996 (State Only)*	All equipment must be maintained in good working order.	Condition No. 1.~~17~~15 Facility-wide Inspections Condition Nos. 1.~~20~~18 – 1.~~21~~19 O&M Plan Requirements Condition No. 2.36 Spray Coating Inspections

5. Emission Unit No. 5: Coating Operations: Truck Components

The requirements in Table 8 apply to Emission Unit No. 5. This emission unit includes cleaning and surface coating activities of truck components. Currently, it is located in Building 1 and includes cleaning and surface coating of truck components such as doors, fenders, hoods, wheels, bumpers, cabs, sleepers and integrated units. Emission units may be relocated throughout the site without modifying the operating permit. However, new source review requirements may apply if equipment is modified or reconstructed, or for the replacement or substantial alteration of control equipment (see Section 4 of this permit). The emission unit includes:

- Three water wash paint booths,
- One dry filter paint booth,
- Two paint drying ovens; and
- One paint flash tunnel.

Motor vehicle and mobile equipment coating operations, including spray coating, are subject to the requirements in Table 3.

The paint solvent system delivers solvent to this emission unit area for cleaning purposes; however, it is included in its own emission unit (EU-7).

Table 8. Applicable Requirements Related to Coating Operations: Truck Components

Reqmt No.	Enforceable Requirement	Requirement Paraphrase (Information Only)	Compliance Method
2.25	PSCAA Reg. II, 3.04(d) (7/24/03)	VOC-containing material shall be applied to any motorized vehicles, their parts and components, or equipment designed to be pulled by motorized vehicles using one of the following methods: • High volume, low pressure (0.1 to 10 psig air pressure for atomization) spray equipment, • Electrostatic spray equipment, • Flow coat, • Dip coat, • Brush coat, • Hand-held aerosol cans, • Roll coat, or • Air brush.	Condition No. 2.36 Spray Coating Inspections
2.26	PSCAA Reg. II, 3.04(e) (7/24/03)	Any VOC-containing material used for the cleanup of spray equipment, including paint lines, shall be contained and collected in closed containers.	Condition No. 2.37 Work Practice Monitoring Condition No. 2.38 Spray Coating Training Program
2.27	PSCAA Reg. II, 3.04(f) (7/24/03)	Closed containers shall be used for storage or disposal of VOC-containing materials. Such containers and tanks shall be kept closed except when being cleaned or when materials are being added, mixed, or removed. Closed containers for solvent rag or paper disposal are required. Empty containers as defined in WAC 173-303-160 are exempt	Condition No. 2.37 Work Practice Monitoring Condition No. 2.38 Spray Coating Training Program

Reqmt No.	Enforceable Requirement	Requirement Paraphrase (Information Only)	Compliance Method
2.28	PSCAA Reg I: 9.20 (6/9/88) RCW 70.94.152(7) *1996 (State Only)*	All equipment must be maintained in good working order.	Condition No. 1.17 ~~15~~ Facility-wide Inspections Condition Nos. 1.20 ~~18~~ – 1.21 ~~19~~ O&M Plan Requirements Condition No. 2.36 Spray Coating Inspections

6. Emission Unit No. 6: Coating Operations: Highway and Off-Highway Trucks and Touch-up

The requirements in Table 9 apply to Emission Unit No. 6. This emission unit includes cleaning and surface coating activities of highway and off-highway completed trucks and truck components. Currently, it is located in Building 1 and covers painting and touch-up which includes activities such as stripping, filling, surface preparation, cleaning and surface coating of trucks, and touching up of completed highway and off-highway trucks. Emission units may be relocated throughout the site without modifying the operating permit. However, new source review requirements may apply if equipment is modified or reconstructed, or for the replacement or substantial alteration of control equipment (see Section 4 of this permit). The emission unit includes:

- Two dry filter paint booths, one of which can also function as a drying oven.

Motor vehicle and mobile equipment coating operations, including spray coating, are subject to the requirements in Table 3. The paint solvent system delivers solvent to this emission unit area for cleaning purposes; however, it is included in its own emission unit, EU-7.

Table 9. Applicable Requirements Related to Coating Operations: Highway and Off-Highway Trucks and Touch-up

Reqmt No.	Enforceable Requirement	Requirement Paraphrase (Information Only)	Compliance Method
2.29	PSCAA Reg. II, 3.04(d) (7/24/03)	VOC-containing material shall be applied to any motorized vehicles, their parts and components, or equipment designed to be pulled by motorized vehicles using one of the following methods: • High volume, low pressure (0.1 to 10 psig air pressure for atomization) spray equipment, • Electrostatic spray equipment, • Flow coat, • Dip coat, • Brush coat, • Hand-held aerosol cans, • Roll coat, or • Air brush.	Condition No. 2.36 Spray Coating Inspections
2.30	PSCAA Reg. II, 3.04(e) (7/24/03)	Any VOC-containing material used for the cleanup of spray equipment, including paint lines, shall be contained and collected in closed containers.	Condition No. 2.37 Work Practice Monitoring Condition No. 2.38 Spray Coating Training Program
2.31	PSCAA Reg. II, 3.04(f) (7/24/03)	Closed containers shall be used for storage or disposal of VOC-containing materials. Such containers and tanks shall be kept closed except when being cleaned or when materials are being added, mixed, or removed. Closed containers for solvent rag or paper disposal are required. Empty containers as defined in WAC 173-303-160 are exempt	Condition No. 2.37 Work Practice Monitoring Condition No. 2.38 Spray Coating Training Program
2.32	PSCAA Reg I: 9.20(a) (6/9/88) RCW 70.94.152(7) *1996 (State Only)*	All equipment must be maintained in good working order.	Condition No. 1.~~15~~ 18 19 Facility-wide Inspections Condition Nos. 1.20 – 1.21 O&M Plan Requirements Condition No. 2.36 Spray Coating Inspections

7. Emission Unit No. 7: Coating Mix/Solvent System

The requirements in Table 10 apply to Emission Unit No. 7. This emission unit includes the storage, thinning, tinting, and packaging of coating materials for application on truck components, completed trucks and other maintenance coating needs, as well as the solvent and activator storage and distribution systems. The paint mix room is located in Building 1 and includes ventilation with no pollution control equipment. Solvent is delivered by piping system from the storage tank in Building 2 to the paint mix room in Building 1, then distributed to each of the coating operations emission units. At each solvent delivery station, used solvent is collected and piped to the waste solvent tank located in Building 2. In Building 2, in the waste processing area, clean solvent is reclaimed from the waste stream and reused. Paint components and activator are received in various size containers up to bulk storage totes and are transferred to use containers and storage tanks of variable size, then distributed to each of the coating operations emission units.

Motor vehicle and mobile equipment coating operations, including spray coating, are subject to the requirements in Table 3.

Table 10. Applicable Requirements Related to Coating Mix/Solvent System

Reqmt No.	Enforceable Requirement	Requirement Paraphrase (Information Only)	Compliance Method
2.33	PSCAA Reg. II, 3.04(e) (7/24/03)	Any VOC-containing material used for the cleanup of spray equipment, including paint lines, shall be contained and collected in closed containers.	Condition No. 2.37 Work Practice Monitoring Condition No. 2.38 Spray Coating Training Program
2.34	PSCAA Reg. II, 3.04(f) (7/24/03)	Closed containers shall be used for storage or disposal of VOC-containing materials. Such containers and tanks shall be kept closed except when being cleaned or when materials are being added, mixed, or removed. Closed containers for solvent rag or paper disposal are required. Empty containers as defined in WAC 173-303-160 are exempt	Condition No. 2.37 Work Practice Monitoring Condition No. 2.38 Spray Coating Training Program
2.35	PSCAA Reg I: 9.20(a) (6/9/88) RCW 70.94.152(7) *1996 (State Only)*	All equipment must be maintained in good working order.	Condition No. 1.~~17~~15 Facility-wide Inspections Condition Nos. 1.~~20~~18 – 1.~~21~~19 O&M Plan Requirements

COMPLIANCE METHODS

Spray Coating Inspections

2.36 The permittee shall inspect the spray coating lines, booths and filter systems at least once each week that each booth operates for the following:

a. Check the primary dry filter system, where visible, for proper seating and complete coverage over the exhaust plenum;

b. For downdraft water filtration systems check for a complete water blanket and for side-draft water filtration systems check for a complete water curtain;

c. Check and record the pressure drop across the dry filter system and verify within acceptable limits. The acceptable limits shall be established using either manufacturer's recommendations, specification, or instruction, or shall be based on providing adequate air flow while maintaining filter integrity based on the specific design of the system; and

d. Evidence of abnormal odor or paint emissions.

The permittee shall initiate corrective action for any problems identified by these inspections as soon as possible but no later than 24 hours after identification or shut down the unit or activity until it can be repaired. The permittee shall keep records of the inspections, including date and time of inspection, the name or ID of the person conducting inspection, the results of the inspection, and any corrective action conducted. Failure to implement corrective action or else shut down the unit/activity within 24 hours of initial observation of noncompliance shall be reported as a deviation under Condition 5.5.

[WAC 173-401-615(1)(b)]

Work Practice Monitoring

2.37 At least once per calendar quarter, the permittee shall conduct a facility-wide inspection to verify that VOC-containing materials are stored and disposed of in closed containers. The permittee shall initiate corrective action for any problems identified by these inspections as soon as possible but no later than 1 hour after identification. The permittee shall keep records of the inspections, including date and time of inspection, the name or ID of the person conducting inspection, the results of the inspection, and any corrective action conducted. Failure to implement corrective action within 1 hour of initial observation of noncompliance shall be reported as a deviation under Condition 5.5.

[WAC 173-401-615(1)(b)]

Spray Coating Training Program

2.38 Employees conducting surface coating or cleaning activities shall be initially trained and annually refreshed on the following activities:

a. Proper operation of spray coating equipment;

b. Use of closed containers for storage and disposal of VOC-containing materials, including material used for equipment cleanup.

All training and refresher courses shall include an attendance record with signature of attendees and date of training. Failure to conduct training or maintain required records shall be reported as a deviation under Condition 5.5.

[WAC 173-401-615(1)(b)]

Dust Collector Inspections

2.39 At least once per calendar quarter, the permittee shall conduct an inspection of each dust collector or baghouse for visible emissions and evidence of visible dust or fallout. Inspections are to be performed while the equipment is in operation during daylight hours. If, during the scheduled inspection or at any other time, visible emissions other than uncombined water are observed, Kenworth shall, as soon as possible, but no later than within 24 hours of the initial observation, initiate corrective action until there are no visible emissions or, alternatively, record the opacity using the reference test method or shut down the unit or activity that is generating the emissions until the related dust collector can be repaired. The permittee shall keep records of the inspections, including date and time of inspection, the name or ID of the person conducting inspection, the results of the inspection, and any corrective action conducted. Failure to implement corrective action or else shut down the unit/activity within 24 hours of initial observation of noncompliance shall be reported as a deviation under Condition 5.5.

[WAC 173-401-615(1)(b)]

C. Combustion Equipment

1. Emission Unit No. 8: Gas Fueled Equipment

The requirements in Table 11 apply to Emission Unit No. 8. This emission unit includes all air, water and other medium heaters that are fueled by natural gas and are larger than applicable size thresholds making them significant sources. This includes makeup air units (MAUs) and air supply houses (ASHs) larger than 5 MMBtu/hr. Currently, natural gas is the primary fuel; however, other petroleum-based fuels may be used including propane, butane, and liquid natural gas.

Table 11. Applicable Requirements Related to Gas Fueled Equipment

Reqmt No.	Enforceable Requirement	Requirement Paraphrase (Information Only)	Compliance Method
2.40	PSCAA Reg I: 9.03, except for 9.03(e) (5/1/04) ~~(3/11/99)~~ ~~*(3/25/04, State Only)*~~ ~~WAC 173-400-040(1)(a) & (b) (9/20/93)~~ ~~*Once EPA deletes the 9/20/93 version of the WAC from the PSCAA SIP, only the 3/25/04 version of Reg. I, Section 9.03 will apply.*~~	Shall not emit air contaminants which exhibit greater than 20% opacity for a period or periods aggregating more than 3 minutes in any hour	Condition No. 2.43 Gas Fueled Equipment Inspections
2.41	PSCAA Reg I: 9.09 (6/1/98) ~~(4/9/98)~~	Shall not emit particulate matter in excess of 0.05 gr/dscf corrected to 7% O_2 from fuel burning equipment	Condition No. 2.43 Gas Fueled Equipment Inspections
2.42	PSCAA Reg I: 9.20 (6/9/88) RCW 70.94.152(7) *1996 (State Only)*	All equipment must be maintained in good working order.	Condition No. 1.~~17~~ 15 Facility-wide Inspections Condition Nos. 1.~~20~~ 18 – 1.~~21~~ 19 O&M Plan Requirements Condition No. 2.43 Gas Fueled Equipment Inspections

COMPLIANCE METHOD

Gas Fueled Equipment Inspections

2.43 At least once per calendar quarter, the permittee shall conduct an inspection of each unit larger than 5 MMBtu/hr that exhausts to the outside of the building for visible emissions. Inspections are to be performed while the equipment is in operation during daylight hours. If, during the scheduled inspection or at any other time, visible emissions other than uncombined water are observed, the permittee shall, as soon as possible, but no later than within 24 hours of the initial observation, initiate corrective action until there are no visible emissions or, alternatively, record the opacity using the reference test method or shut down the unit or activity that is generating the emissions until the related dust collector can be repaired. The permittee shall keep records of the inspections, including date and time of inspection, the name or ID of the person conducting inspection, the results of the inspection, and any corrective action conducted. Failure to implement corrective action or else shut down the unit/activity within 24 hours of initial observation of noncompliance shall be reported as a deviation under Condition 5.5.

[WAC 173-401-615(1)(b)]

2. Emission Unit No. 9: Emergency Engines

The requirements in Table 12 apply to Emission Unit No. 9. This emission unit includes equipment that is necessary for emergency situations and includes an existing 380 HP emergency electrical generator and an existing 235 HP fire pump. Both engines installed prior to 1994. Currently, diesel is the primary fuel; however, other alternative fuels may be used. NOTE: 40 CFR 63.6640(f)(2)(ii)&(iii) (1/30/13) have been vacated per Delaware v. EPA 785 F.3d 1 (D.C. Cir 2015). An emergency stationary RICE may not be operated for the purposes specified in 40 CFR 63.6640(f)(2)(ii)&(iii) (1/30/13) unless it meets the applicable requirements for a non-emergency engine.

Table 12. Applicable Requirements Related to Emergency Engines

Reqmt No.	Enforceable Requirement	Requirement Paraphrase (Information Only)	Compliance Method
2.44	40 CFR 63.1(c)(1) (4/5/02) PSCAA Reg. III, Section 2.02 (4/23/15) (*State Only*) PSCAA Reg. I, Section 3.25 ~~(9/22/16) (*State Only*)~~ (11/1/19)	The permittee shall comply with any relevant standards established under 40 CFR 63, Subparts A and ZZZZ.	No monitoring required
2.45	40 CFR 63.6595(c) (1/30/13) 40 CFR 63.4(a)(2) (4/5/02) PSCAA Reg. III, Section 2.02 (4/23/15) (*State Only*) PSCAA Reg. I, Section 3.25 ~~(9/22/16) (*State Only*)~~ (11/1/19)	The permittee must meet the applicable notification requirements in 40 CFR 63.6645 and in 40 CFR 63, Subpart A.	No monitoring required
2.46	40 CFR 63.4(b) (4/5/02) PSCAA Reg. III, Section 2.02 (4/23/15) (*State Only*) PSCAA Reg. I, Section 3.25 ~~(9/22/16) (*State Only*)~~ (11/1/19)	The permittee shall not operate any affected source in violation of the requirements of 40 CFR 63 and shall not build, erect, install, or use any article, machine, equipment, or process to conceal an emission that would otherwise constitute noncompliance with a relevant standard	No monitoring required
2.47	40 CFR 63.6603(a) (1/30/13) 40 CFR 63 Subpart ZZZZ Table 2d (1/30/13) 40 CFR 63.6605(a) (1/30/13) 40 CFR 63.6625(i) (1/30/13) 40 CFR 63.4(a)(1) (4/5/02) PSCAA Reg. III, Section 2.02 (4/23/15) (*State Only*) PSCAA Reg. I, Section 3.25	For an existing emergency stationary compression ignition RICE located at an area source of HAP emissions, the permittee must comply with the requirements in Table 2d of the subpart: • Change oil and filter every 500 hours of operation, or annually, whichever comes first; • Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and • Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement based on the procedures in 40 CFR	2.55 – 2.59 RICE Compliance Methods

Reqmt No.	Enforceable Requirement	Requirement Paraphrase (Information Only)	Compliance Method
	~~(9/22/16) (State Only)~~ (11/1/19)	63.6625(j).	
2.48	40 CFR 63.6605(b) (1/30/13) 40 CFR 63.4(a)(1) (4/5/02) PSCAA Reg. III, Section 2.02 (4/23/15) (*State Only*) PSCAA Reg. I, Section 3.25 ~~(9/22/16) (State Only)~~ (11/1/19)	At all times, the permittee must operate and maintain the existing stationary RICE in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Agency which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.	2.55 – 2.59 RICE Compliance Methods
2.49	40 CFR 63.6625(e) (1/30/13) 40 CFR 63.4(a)(1) (4/5/02) PSCAA Reg. III, Section 2.02 (4/23/15) (*State Only*) PSCAA Reg. I, Section 3.25 ~~(9/22/16) (State Only)~~ (11/1/19)	The permittee must operate and maintain the existing emergency stationary RICE according to the manufacturer's emission-related written instructions or develop its own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions	2.55 – 2.59 RICE Compliance Methods
2.50	40 CFR 63.6625(f) (1/30/13) 40 CFR 63.4(a)(1) (4/5/02) PSCAA Reg. III, Section 2.02 (4/23/15) (*State Only*) PSCAA Reg. I, Section 3.25 ~~(9/22/16) (State Only)~~ (11/1/19)	The permittee must install and operate a non-resettable hour meter	2.55 – 2.59 RICE Compliance Methods
2.51	40 CFR 63.6625(h) (1/30/13) 40 CFR 63.4(a)(1) (4/5/02) PSCAA Reg. III, Section 2.02 (4/23/15) (*State Only*) PSCAA Reg. I, Section 3.25 ~~(9/22/16) (State Only)~~ (11/1/19)	The permittee must minimize the engine's time spent at idle during startup and minimize startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.	2.55 – 2.59 RICE Compliance Methods
2.52	40 CFR 63.6640(f) (1/30/13) 40 CFR 63.4(a)(1) (4/5/02) PSCAA Reg. III, Section 2.02 (4/23/15) (*State Only*) PSCAA Reg. I, Section 3.25	For an emergency stationary RICE, the permittee must operate the emergency stationary RICE according to the requirements in 40 CFR 63.6640(f)(1) through (4). In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year is prohibited. If you do not operate the engine according	2.55 – 2.59 RICE Compliance Methods

Reqmt No.	Enforceable Requirement	Requirement Paraphrase (Information Only)	Compliance Method
	~~(9/22/16) (State Only)~~ (11/1/19)	to these requirements, the engine will not be considered an emergency engine and must meet all requirements for non-emergency engines. There is no time limit on the use of emergency stationary RICE in emergency situations.	
2.53	40 CFR 63.9(j) (5/30/03) PSCAA Reg. III, Section 2.02 (4/23/15) (*State Only*) PSCAA Reg. I, Section 3.25 ~~(9/22/16) (State Only)~~ (11/1/19)	Any change in information already provided under 40 CFR Part 63 shall be provided to the Agency in writing with 15 calendar days after the change.	No monitoring required
2.54	~~PSCAA Reg I: 9.08(a) (4/14/94)~~ PSCAA Reg I: 9.08(a) (5/1/04) ~~(3/25/04) (State Only)~~ RCW 70.94.610 *(1991) State only*	It shall be unlawful for any person to cause or allow combustion of oil that exceeds any of the following limits unless allowed by a PSCAA OA issued under ~~Reg I: 6.07~~ Article 6. All limits are the maximum allowed except flash point, which is the minimum allowed. ~~*(Note: In the 3/25/04 version of Reg. I, 9.08(a), the reference to Reg I: 6.07 is changed to Article 6.):*~~ • Ash 0.1% • Sulfur, used oil 1.0% • Sulfur, fuel oil 2.00% • Lead 100 ppm • Arsenic 5 ppm • Cadmium 2 ppm • Chromium 10 ppm • Total halogens 1,000 ppm • PCBs 2 ppm • Flash point 100 °F	The fuel oil contract for delivery of oil burned in emergency generators shall specify fuel must meet the specifications listed.

COMPLIANCE METHODS

RICE Compliance Methods

2.55 The permittee shall maintain the following records to demonstrate compliance with the requirement:

a. Records of maintenance conducted on each engine in order to demonstrate that it was operated and maintained according to the facility maintenance plan and requirements of the rule. 40 CFR 63.6655(e)

b. If the engine does not meet the standards applicable to non-emergency engines, records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

c. Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment.

d. Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

[40 CFR 63.6655]

2.56 If the permittee chooses to utilize an oil analysis program in order to extend the specified oil change requirement, the oil analysis must be every 500 hours of operation, or annually, whichever comes first. The analysis program must at a minimum follow the requirements in 40 CFR 63.6625(j) for determining if an oil change is required. The permittee must maintain records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

2.57 The Agency will determine compliance with design, equipment, work practice, or operational emission standards in the NESHAP by review of records, inspection of the source, and other procedures specified in the NESHAP. The Agency will make a finding concerning compliance with a non-opacity standard upon obtaining all the compliance information required by the standard.

[40 CFR 63.6(f)(2)(v) and (3)]

2.58 Records must be in a form suitable and readily available for expeditious review. Each record must be kept and readily accessible in hard copy or electronic format for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record.

[40 CFR 63.6660]
[40 CFR 63.10(b)(1)]

2.59 The permittee must report each instance in which the operating limitation in Table 2.d of the subpart that applied (Condition 2.47) was not met, each instance in which the requirements in Table 8 of 40 CFR Part 63, Subpart ZZZZ (Applicability of General Provisions) was not

met, and any other deviation of the requirements in the NESHAP in accordance with the operating permit deviation reporting requirement in Condition 5.5.

[40 CFR 63.6640(b) and (e)]
[40 CFR 63.6650(f)]
[40 CFR 63.4(a)(2)]

Section 3: Standard Terms and Conditions

Duty to Comply

3.1 The permittee must comply with all conditions of this chapter 401 permit. Any permit noncompliance constitutes a violation of chapter 70.94 RCW and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

[WAC 173-401-620(2)(a)]

3.2 It shall be unlawful for any person to cause or allow the operation of any source subject to the requirements of WAC 173-401 without complying with the provisions of WAC 173-401 and any permit issued under its authority.

[PSCAA Reg I, Section 7.05]

Need to Halt or Reduce Activity not a Defense

3.3 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

[WAC 173-401-620(2)(b)]

Permit Actions

3.4 This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

[WAC 173-401-620(2)(c)]

Property Rights

3.5 This permit does not convey any property rights of any sort, or any exclusive privilege.

[WAC 173-401-620(2)(d)]

Duty to Provide Information

3.6 The permittee shall furnish to the Puget Sound Clean Air Agency, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Puget Sound Clean Air Agency copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Puget Sound Clean Air Agency along with a claim of confidentiality. Puget Sound Clean Air Agency shall maintain confidentiality of such information in accordance with RCW 70.94.205.

[WAC 173-401-620(2)(e)]

Permit Fees

3.7 The permittee shall pay fees as a condition of this permit in accordance with the Puget Sound Clean Air Agency's fee schedule in accordance with Puget Sound Clean Air Agency's Regulation I, Section 7.07. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in chapter 70.94 RCW.

[WAC 173-401-620(2)(f) and PSCAA Regulation I, Section 7.07]

Emissions Trading

3.8 No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

[WAC 173-401-620(2)(g)]

Severability

3.9 If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable.

[WAC 173-401-620(2)(h)]

Permit Appeals

3.10 This permit or any conditions in it may be appealed only by filing an appeal with the pollution control hearings board and serving it on the Puget Sound Clean Air Agency within thirty days of receipt pursuant to RCW 43.21B.310. This provision for appeal in this section is separate from and additional to any federal rights to petition and review under §505(b) of the FCAA.

[WAC 173-401-620(2)(i)]

Permit Continuation

3.11 This permit and all terms and conditions contained therein, including any permit shield provided under WAC 173-401-640, shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect until the renewal permit has been issued or denied if a timely and complete application has been submitted.

[WAC 173-401-620(2)(j)]

Section 4: General Permitting Requirements

Permit Renewal

4.1 The permittee shall submit a timely and complete Title V permit renewal application to the Puget Sound Clean Air Agency no later than 180 days prior to the expiration of this permit.

[WAC 173-401-710(1)]
[WAC 173-401-500(3)(d)]

Expired Permits

4.2 Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application has been submitted consistent with Condition No. 4.1 of this permit and WAC 173-401-500. All terms and conditions of the permit shall remain in effect after the permit itself expires if a timely and complete permit application has been submitted.

[WAC 173-401-710(3)]

Revocation of Permits

4.3 The Puget Sound Clean Air Agency may revoke a permit only upon the request of the permittee or for cause. The Puget Sound Clean Air Agency shall provide at least thirty days written notice to the holder of a current operating permit prior to revocation of the permit or denial of a permit renewal application. Such notice shall include an explanation of the basis for the proposed action and afford the permittee/applicant an opportunity to meet with the Puget Sound Clean Air Agency prior to the authority's final decision. A revocation issued may be issued conditionally with a future effective date and may specify that the revocation will not take effect if the permittee satisfies the specified conditions before the effective date. Nothing in this condition shall limit the Puget Sound Clean Air Agency's authority to issue emergency orders.

[WAC 173-401-710(4)]

Reopening for Cause

4.4 This permit shall be reopened and revised under any of the circumstances described in WAC 173-401-730(1). Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

[WAC 173-401-730]

Administrative Permit Amendments

4.5 The permittee may file for an administrative permit amendment in accordance with WAC 173-401-720(3). The permittee may implement the changes addressed in the request for an administrative request immediately upon submittal of the request. An "administrative permit amendment" is a permit revision that:

a. Corrects typographical errors;

b. Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;

c. Requires more frequent monitoring or reporting by the permittee;

d. Allows for a change in ownership or operational control of a source where the Puget Sound Clean Air Agency determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Puget Sound Clean Air Agency;

e. Incorporates into the permit the terms, conditions, and provisions from orders approving notice of construction applications processed under an EPA-approved program, provided that such a program meets procedural requirements substantially equivalent to the requirements of WAC 173-401-700, 173-401-725, and 173-401-800 that would be applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in WAC 173-401-600 through 173-401-650.

4.6 **Permit shield:** The Puget Sound Clean Air Agency shall, upon taking final action granting a request for an administrative permit amendment, allow coverage by the permit shield in WAC 173-401-640 for administrative permit amendments made pursuant to Condition 4.5(e).

[WAC 173-401-720]

Minor Permit Modifications

4.7 For minor permit modifications that meet the following criteria, the permittee shall submit an application as described in WAC 173-401-725(2)(b):

a. Do not violate any applicable requirement;

b. Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

c. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;

d. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid and applicable requirement to which the source would otherwise be subject. Such terms and conditions include a federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the FCAA and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the FCAA; and

e. Are not modifications under any provision of the Title I of the FCAA.

4.8 The permit modification shall be accomplished in accordance with the criteria and procedures as described in WAC 173-401-725(2)(c) through (2)(e).

4.9 For group processing of modifications that meet the following criteria, the permittee shall submit an application as described in WAC 173-401-725(3)(b):

a. Meets the criteria for minor permit modification procedures in Term 4.7; and

b. Collectively are below ten percent of the emissions allowed by the permit for the emissions unit for which the change is requested, twenty percent of the applicable definition of major source in WAC 173-401-200, or five tons per year, whichever is least.

4.10 The permit modification shall be accomplished in accordance with the criteria and procedures as described in WAC 173-401-725(3)(c) through (3)(e).

4.11 The permittee may make the change(s) proposed in its minor permit modification application immediately after it files such as application provided that those changes requiring the submissions of a notice of construction application have been reviewed and approved by the Puget Sound Clean Air Agency. After the permittee makes the change allowed by the preceding sentence, and until the permitting authority takes any of the actions specified in WAC 173-401-725(2)(d), the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time period, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the source fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it.

4.12 **Permit shield:** The permit shield under WAC 173-401-640 shall not extend to minor permit modifications.

[WAC 173-401-725(2) and (3)]

Significant Permit Modifications

4.13 For significant permit modifications that meet the following criteria, the modification shall meet all requirements of Chapter 173-401 WAC, including those for applications, public participation, review by affected states, and review by EPA, as they apply to permit issuance and permit renewal:

a. Permit modifications that do not qualify as minor permit modifications or as administrative amendments;

b. Every significant change in existing monitoring permit terms or conditions and every relaxation of reporting or recordkeeping permit terms or conditions.

Nothing herein shall be construed to preclude the permittee from making changes consistent with Chapter 173-401 WAC that would render existing permit compliance terms and conditions irrelevant.

[WAC 173-401-725(4)]
[WAC 173-401-500 (3)(c)]

Changes Not Requiring Permit Revisions

4.14 The permittee is authorized to make the changes described in WAC 173-401-722 without a permit revision, provided the following conditions are met:

a. The proposed changes are not Title I modifications;

b. The proposed changes do not result in emissions which exceed those allowable under the permit, whether expressed as a rate of emissions, or in total emissions;

c. The proposed changes do not alter permit terms that are necessary to enforce limitations on emissions from the units covered by the permit; and

d. The facility provides the administrator and PSCAA with written notification at least seven days prior to making the proposed changes except that written notification of a change made in response to an emergency shall be provided as soon as possible after the event.

Changes described in WAC 173-401-722 include Section 502(b)(10) changes (changes that contravene an express permit term, but do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements), SIP authorized emission trading, and emission caps. Requirements for notification are included in WAC 173-401-722(2), (3) and (4)

4.15 The permit shield does not apply to any 502(b)(10) change or SIP authorized emission trading, but does extend to terms and conditions that allow increases or decreases in emissions under changes to emission caps.

4.16 The permittee shall comply with applicable preconstruction review requirements.

4.17 The permittee and PSCAA shall attach each notice to their copy of the relevant permit.

[WAC 173-401-722]

Off Permit Changes

4.18 The permittee is allowed to make changes not specifically addressed or prohibited by the permit terms and conditions without requiring a permit revision, provided that the proposed changes do not weaken the enforceability of existing permit conditions. Any change that is a Title I modification must be submitted as a permit revision. Each change shall meet all applicable requirements and shall not violate any existing permit term or condition.

4.19 The permittee shall provide contemporaneous written notice to PSCAA and EPA of such change, except for changes that qualify as insignificant under WAC 173-401-530. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.

4.20 The change shall not qualify for the permit shield.

4.21 The permittee shall comply with applicable preconstruction review requirements.

4.22 The permittee shall keep a record describing changes made that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes.

[WAC 173-401-724]

Duty to Supplement or Correct Application

4.23 Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, an applicant shall provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a draft permit.

[WAC 173-401-500(6)]

Notice of Construction

4.24 Except for the exemptions provided in Sections 6.03(b) and (c) of Puget Sound Clean Air Agency's Regulation I, it shall be unlawful for any person to cause or allow the establishment of a new source, or the replacement or substantial alteration of control equipment installed on an existing source, unless a "Notice of Construction application" has been filed and an "Order of Approval" has been issued by the Puget Sound Clean Air Agency. The exemptions in PSCAA Regulation I, 6.03(b) and (c) do not apply to projects or sources identified in PSCAA Regulation I, 6.03(a)(1) – (5).

[PSCAA Regulation I, Section 6.03(a)]
[WAC 173-400-110]
[WAC 173-400-114]

New Source Notification

4.25 Except for projects or sources identified in PSCAA Regulation I, 6.03(a)(1) – (5), a Notice of Construction application and Order of Approval are not required for the new sources identified in PSCAA's Regulation I, Section 6.03(b), provided that a complete notification is filed with PSCAA.

[PSCAA Regulation I, Section 6.03(b)]

Prevention of Significant Deterioration (PSD)

4.26 For a new major stationary source or a major modification to an existing major stationary source as defined in WAC 173-400-720, the permittee must comply with the requirements in WAC 173-400-700 through 750. Ecology is the permitting agency for the PSD program in WAC 173-400-700 through -750.

[PSCAA Regulation I, Section 6.01(a)+(b)]
[WAC 173-400-113(5); WAC 173-400-700 through -750]

Notice of Completion

4.27 Within 30 days of completion of the installation or modification of a stationary source subject to Condition No. 4.24 of this section, the permittee shall file a Notice of Completion with PSCAA. Each Notice of Completion shall be submitted on a form provided by PSCAA, and shall specify the date upon which operation of the stationary source has commenced or will commence.

[PSCAA Regulation I, Section 6.09]

Section 5: General Compliance Requirements

Schedule of Compliance

5.1 For applicable requirements with which the source is in compliance, the permittee will continue to comply with such requirements.

For applicable requirements that will become effective during the permit term, the permittee shall meet such requirements on a timely basis.

[WAC 173-401-630(3)]
[WAC 173-401-510(2)(h)(iii)]

Responsible Official Certification

5.2 Except as provided for in Condition 5.6, Certification Upon Submittal, any application form, report, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required by a responsible official under this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[WAC 173-401-520]
[WAC 173-401-630(1)]

Compliance Certification

5.3 The permittee shall submit a certification of compliance with the terms and conditions contained in the permit, including emission limitations, standards, or work practices.

The compliance certification, (original written document), shall be submitted to both EPA Region 10 and to the Puget Sound Clean Air Agency once per year (August 24 - August 23), by September 22 for the previous year.

The compliance certification shall include the following:

a. The identification of each term or condition of the permit that is the basis of the certification;

b. The compliance status;

c. Whether compliance was continuous or intermittent; and

d. The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with WAC 173-401-615 (3)(a).

The permittee shall also submit the compliance certification to Puget Sound Clean Air Agency in electronic format as an attachment to an e-mail message [facilitysubmittal@pscleanair.org] by September 22 for previous year (August 24 - August 23). The date the document is received by the Agency e-mail system is considered the submitted date of the report.

[WAC 173-401-630(5)]
[PSCAA Regulation I, Section 7.09(c)]

Semi-annual Report

5.4 The permittee shall submit the reports of any required reportable monitoring at least once every six months. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with WAC 173-401-520. The report periods and submittal due dates are as shown below.

a. Reporting period covering August 24 – February 24. Report submittal due date is March 26.

b. Reporting period covering February 25 – August 23. Report submittal due date is September 22.

The permittee shall also submit the semi-annual reports to Puget Sound Clean Air Agency in electronic format as an attachment to an e-mail message [facilitysubmittal@pscleanair.org] by March 26 for the August 24 – February 24 reporting period and by September 22 for the February 25 - August 23 reporting period. The date the document is received by the Agency e-mail system is considered the submitted date of the report.

[WAC 173-401-615 (3)(a)]
[PSCAA Regulation I, Section 7.09(c)]

Deviation Report

5.5 The permittee shall promptly report all deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken.

a. For deviations which represent a potential threat to human health or safety, "prompt" means as soon as possible, the permittee shall report by e-mail to facilitysubmittal@pscleanair.org (or any successive email address that we identify) as soon as possible but in no case later than twelve hours after the deviation is discovered.

b. All other deviations shall be reported in writing and by email no later than thirty days after the end of the month during which the deviation is discovered.

The permittee shall maintain a contemporaneous record of all deviations.

A Deviation Report may be certified by a responsible official at the time of submittal as provided in Condition 5.2 (Responsible Official Certification); however it is not required to be certified at the time of submittal. Any Deviation Report not certified at the time of submittal must be certified in the Semi-annual report as per Condition 5.6 (Certification upon Submittal).

[WAC 173-401-615(3)(b)]

Certification upon Submittal

5.6 For the purpose of this permit, the following application forms, reports, and compliance certifications must be certified by the responsible official upon submittal:

- Annual Air Operating Permit Compliance Certification (WAC 173-401-630(5))
- Semi-annual Air Operating Permit Report (WAC 173-401-615(3)(a))
- Administrative Permit Amendment Requests (WAC 173-401-720)

- Permit Modification Application (WAC 173-401-725)
- Renewal of Permit (WAC 173-401-710) (WAC 173-401-500(4))
- All reports submitted to comply with 40 CFR Part 63, Subpart ZZZZ

For all other application forms, reports, and compliance certifications, the responsible official's certification needs only to be submitted once every six months in the semi-annual report, covering all required reporting since the date of the last certification, provided that the certification specifically identifies all documents.

[WAC 173-401-630(5)]

Mailing Address

5.7 All notifications, reports, renewal/revision applications and compliance certifications required by this permit shall be submitted to:

Puget Sound Clean Air Agency
Attn: Compliance Program
1904 3rd Ave, Suite 105
Seattle, Washington 98101

5.8 For all the notifications, reports and compliance certifications required by this permit to be submitted to US Environmental Protection Agency, the mailing address is:

EPA Region 10, Mail Stop OAQ-107
Attn: Air Operating Permit
1200 Sixth Avenue
Seattle, Washington 98101

Compliance Reports-Electronic Submittal

5.9 The permittee shall submit complete copies of all required compliance reports to Puget Sound Clean Air Agency in electronic format as an attachment to an e-mail message [facilitysubmittal@pscleanair.org]. The date the document is received by the Agency e-mail system shall be considered the submitted date of the report. Original written documents shall also be submitted for record purposes. Nothing in this condition waives or modifies any requirements established under other applicable regulations.

[PSCAA Regulation I, Section 7.09(c)]

Inspection and Entry

5.10 Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or an authorized representative to perform the following:

a. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

d. As authorized by WAC 173-400-105 and the FCAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

[WAC 173-401-630(2)]

Investigations

5.11 For the purpose of determining compliance with an emission standard, the Puget Sound Clean Air Agency or Ecology shall have the authority to conduct testing of a source or to order the permittee to have it tested and to report the results to the Agency or Ecology. In the event the Agency or Ecology conducts the test, the Agency or Ecology shall provide the permittee an opportunity to observe the sampling and to obtain a sample at the same time.

[PSCAA Regulation I, Section 3.05(b)]
[WAC 173-400-105(4)]

Credible Evidence

5.12 For the purpose of establishing whether or not a person has violated or is in violation of any provision of chapter 70.94 RCW, any rule enacted pursuant to that chapter, or any permit or order issued thereunder, nothing in this regulation shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test procedures or methods had been performed.

[PSCAA Regulation I, Section 3.06]

Emergency

5.13 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]

Excess Emissions

5.14 The permittee shall have the burden of proving to Puget Sound Clean Air Agency in an enforcement action that excess emissions were unavoidable. Excess emissions which represent a potential threat to human health or safety or which the permittee believes to be unavoidable shall be reported to Puget Sound Clean Air Agency as soon as possible. Other excess emissions shall be reported within thirty days after the end of the month during which the event occurred or as part of the routine emission monitoring reports. Upon request by Puget Sound Clean Air Agency, the permittee shall submit a full written report including the known causes, the corrective actions taken, and the preventive measures to be taken to minimize or eliminate the chance of recurrence.

[WAC 173-400-107(1) & (3)]

5.15 Excess emissions determined to be unavoidable under Conditions No.5.16, 5.17 or 5.18 of this permit shall be excused and not subject to penalty.

[WAC 173-400-107(2)]

5.16 Excess emissions due to startup or shutdown conditions shall be considered unavoidable provided the permittee reports as required under Condition No.5.14 of this permit and adequately demonstrates that the excess emissions could not have been prevented through careful planning and design and if a bypass of control equipment occurs, that such bypass is necessary to prevent loss of life, personal injury, or severe property damage.

[WAC 173-400-107(4)]

5.17 Excess emissions due to scheduled maintenance shall be considered unavoidable if the permittee reports as required under Condition No.5.14 of this permit and adequately demonstrates that the excess emissions could not have been avoided through reasonable design, better scheduling for maintenance or through better operation and maintenance practices.

[WAC 173-400-107(5)]

5.18 Excess emissions due to upsets shall be considered unavoidable provided the permittee reports as required under Condition No.5.14 of this permit and adequately demonstrates that:

a. The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition;

b. The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance; and

c. The operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emission unit as necessary to minimize emissions, when the operator

knew or should have known that an emission standard or permit condition was being exceeded.

[WAC 173-400-107(6)]

Permit Shield

5.19 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in this permit. The permit shield does not apply to any insignificant emissions unit or activity so designated under WAC 173-401-530.

[WAC 173-401-640(1)]
[WAC 173-401-530(3)]

5.20 Exclusions. Nothing in WAC 173-401-640 or in this permit shall alter or affect the following:

a. The provisions of section 303 of the FCAA (emergency orders), including the authority of the administrator under that section;

b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program, consistent with section 408(a) of the FCAA;

d. The ability of EPA to obtain information from a source pursuant to section 114 of the FCAA; or

e. The ability of the Puget Sound Clean Air Agency to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in chapter 252, Laws of 1993.

[WAC 173-401-640(4)]

Compliance Test Methods

5.21 Testing of sources for compliance with emission standards shall be performed in accordance with current U.S. Environmental Protection Agency approved methods unless specific methods have been identified in this permit.

[PSCAA Regulation I, Section 3.07(a)]

Compliance Test Notification

5.22 The permittee shall notify the Puget Sound Clean Air Agency in writing at least 21 days prior to any compliance test. Notification of a compliance test shall be submitted on forms provided by the Agency. Test notifications using the Agency forms do not constitute test plans. Compliance with this notification provision does not satisfy any obligation found in an order or other regulatory requirement to submit a test plan for Agency review. This notification requirement does not waive or modify test notification requirements found in other applicable regulations.

[PSCAA Regulation I, Section 3.07(b)]

Compliance Test Report Submittal

5.23 For any required compliance test, the permittee shall submit the compliance test report to the Puget Sound Clean Air Agency no later than 60 days after the test. The report shall include:

a. A description of the source and the sampling location;

b. The time and date of the test;

c. A summary of results, reported in units and for averaging periods consistent with the applicable emission standard;

d. A description of the test methods and quality assurance procedures employed;

e. The amount of fuel burned or raw material processed by the source during the test;

f. The operating parameters of the source and control equipment during the test;

g. Field data and example calculations; and

h. A statement signed by the senior management official of the testing firm certifying the validity of the source test report.

[PSCAA Regulation I, Section 3.07(c)]

Federal Enforceability

5.24 All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the US EPA and citizens under the FCAA, except for those requirements designated as "State Only" in the tables below.

[WAC 173-401-625]

Note: In some cases, there are two effective dates for the same state and local regulations. The "federally enforceable" regulation has been approved by the EPA and is part of the current federally-approved, implementation plan or SIP. A more current version of the regulation may have been adopted, but either was not submitted to EPA for approval into the SIP, or it has been submitted and EPA has not approved it yet. The table below lists state and local regulations that apply to the permittee. The effective date of the regulation approved in the SIP is identified as "Federally Enforceable." The effective date of the version of the rule that is not currently approved in the SIP is shaded in grey and identified as "State Only." When EPA does approve the new regulation into the SIP, the old regulation will be replaced and superseded by the new regulation automatically.

Table 13. WAC Requirements in State Implementation Plan

Washington Administrative Code (WAC)		
Regulation	**Rule Description (Effective Date)**	**Federal Enforceability**
WAC 173-400-035	Nonroad Engines (9/16/18)	State Only
WAC 173-400-040	General Standards for Maximum Emissions ~~(9/20/93)~~	Federally Enforceable, ~~except for~~ sections (1)(a) & (b); (4); and (9)(b) only ~~(1)(c), (1)(d), (2), (4), (6) second paragraph.~~
WAC 173-400-060	General Standards for Maximum Emissions (7/1/16)	State Only
WAC 173-400-060	Emission Standards for General Process Units ~~(3/22/91)~~ (2/24/20)	Federally Enforceable
WAC 173-400-081	Startup and shutdown (9/16/18)	State Only
WAC 173-400-091	Voluntary Limits on Emissions (9/20/93)	Federally Enforceable with respect to Section 112 hazardous air pollutants
WAC 173-400-091	Voluntary Limits on Emissions (4/1/11)	~~State Only~~ Federally Enforceable
WAC 173-400-105	Records, monitoring, and reporting ~~(9/20/93)~~ (11/25/18)	Federally Enforceable
~~WAC 173-400-105~~	~~Records, monitoring, and reporting (7/1/16)~~	~~State Only~~
WAC 173-400-107	Excess Emissions (9/20/93)	Federally Enforceable
WAC 173-400-107	Excess Emissions (9/16/18)	State Only
WAC 173-400-108	Excess Emissions (9/16/18)	State Only
WAC 173-400-109	Excess Emissions (9/16/18)	State Only
WAC 173-400-110	New Source Review (NSR) (9/20/93)	Federally Enforceable
WAC 173-400-110	New Source Review (NSR) (12/29/12)	State Only
WAC 173-400-113	Requirements for New Sources in Attainment or Unclassified Areas (9/20/93)	Federally Enforceable except (5)
WAC 173-400-113	Requirements for New Sources in Attainment or Unclassified Areas (12/29/12)	State Only
WAC 173-400-114	Replacement or substantial alteration of emission control technology (12/29/12)	State Only
WAC 173-400-171	Public notice ~~(9/20/93)~~ (2/24/20)	Federally Enforceable
WAC 173-400-171	Public notice (9/16/18)	State Only
WAC 173-400-200	Creditable stack height and dispersion techniques ~~(3/22/91)~~ (10/3/14)	Federally Enforceable
~~WAC 173-400-200~~	~~Creditable stack height and dispersion techniques (2/10/95)~~	~~State Only~~
WAC 173-400-205	Adjustment for Atmospheric Conditions (3/22/91)	Federally Enforceable
WAC 173-400-700	Review of major stationary sources of air pollution (4/1/11)	Federally Enforceable (Ecology)

Washington Administrative Code (WAC)		
Regulation	**Rule Description (Effective Date)**	**Federal Enforceability**
WAC 173-400-720	Prevention of Significant Deterioration (7/1/16)	Federally Enforceable (Ecology), except: 173-400-720(4)(b)(iii)(C); and 173-400-720(4)(a)(vi) with respect to the incorporation by reference of the text in 40 CFR 52.21(b)(49)(v), 52.21(i)(5)(i), and 52.21(k)(2).
WAC 173-400-730	PSD application and processing procedures (7/1/16)	Federally Enforceable (Ecology)
WAC 173-400-740	PSD permitting public involvement requirements (9/16/18)	Federally Enforceable (Ecology)
WAC 173-400-750	Revisions to PSD (12/29/12)	Federally Enforceable (Ecology)
WAC 173-441-030	Reporting of Emissions of Greenhouse Gases (3/1/15)	State Only
RCW 70.94.970(2), 970(4)	Refrigerants Regulated (1991 c 199 § 602)	State Only

Table 14. PSCAA Requirements in State Implementation Plan

Puget Sound Clean Air Agency Regulation		
Regulation	**Rule Description**	**Federally Enforceability**
Regulation I: Section 3.04	Reasonably Available Control Technology ~~(3/11/99)~~ (7/1/12)	Federally Enforceable, except (e)
~~Regulation I: Section 3.04~~	~~Reasonably Available Control Technology (5/24/12)~~	~~State Only~~
Regulation I: Section 3.06	Credible Evidence (11/14/98)	Federally Enforceable
Regulation I: Section 3.07	Compliance Tests (3/23/06)	State Only
Regulation I: Section 3.23	Alternative Means of Compliance (9/12/96)	State Only
Regulation I: Section 6.01	Components of New Source Review Program ~~(3/28/13)~~ (8/1/18)	~~State Only~~ Federally Enforceable
Regulation I: Section 6.03	New Source Review ~~(9/12/96)~~ (11/1/15)	Federally Enforceable
~~Regulation I: Section 6.03~~	~~New Source Review (9/24/15)~~	~~State Only~~
~~Regulation I: Section 6.06~~	~~New Source Review Public Notice (4/14/94)~~	~~Federally Enforceable~~
~~Regulation I: Section 6.07~~	~~Order to Prevent Construction (4/14/94)~~	~~Federally Enforceable~~
Regulation I: Section 6.09	Notice of Completion ~~(4/14/94)~~ (5/1/04)	Federally Enforceable
~~Regulation I: Section 6.09~~	~~Notice of Completion (3/25/04)~~	~~State Only~~
Regulation I: Section 6.10	Work Done without an Approval ~~(9/11/97)~~ (9/1/01)	Federally Enforceable
~~Regulation I: Section 6.10~~	~~Work Done without an Approval (7/12/01)~~	~~State Only~~
Regulation I: Section 7.09	General Reporting Requirements for Operating Permits (9/10/98) (2/1/17)	Federally Enforceable
~~Regulation I: Section 7.09~~	~~General Reporting Requirements for Operating Permits (12/15/16)~~	~~State Only~~
Regulation I: Section 8.04	General Conditions for Outdoor Burning ~~(11/9/00)~~ (1/1/01)	Federally Enforceable
Regulation I: Section 8.04	General Conditions for Outdoor Burning (9/25/08)	State Only
Regulation I: Section 8.07	Fire Extinguisher Training (9/9/99)	State Only
Regulation I: Section 9.03	Visual Standard ~~(3/11/99)~~ (5/1/04)	Federally Enforceable, except (e)
~~Regulation I: Section 9.03~~	~~Visual Standard (3/25/04)~~	~~State Only~~
Regulation I: Section 9.04	Opacity Standards for Equipment with COM ~~(4/9/98)~~ (5/1/04)	Federally Enforceable, except (d)(2) & (f)
~~Regulation I: Section 9.04~~	~~Opacity Standards for Equipment with COM (3/25/04)~~	~~State Only~~
Regulation I: Section 9.05	Refuse Burning ~~(12/9/93)~~ (1/13/94)	Federally Enforceable

Puget Sound Clean Air Agency Regulation		
Regulation	**Rule Description**	**Federally Enforceability**
Regulation I: Section 9.07	Sulfur Dioxide Emission Standard ~~(4/14/94)~~ (5/19/94)	Federally Enforceable
Regulation I: Section 9.08	Fuel Oil Standards ~~(4/14/94)~~ (5/1/04)	Federally Enforceable
~~Regulation I: Section 9.08~~	~~Fuel Oil Standards (3/25/04)~~	~~State Only~~
Regulation I: Section 9.09	Particulate Matter Emission Standards ~~(4/9/98)~~ (6/1/98)	Federally Enforceable
Regulation I: Section 9.10	Emission of HCl (6/9/88)	State Only
Regulation I: Section 9.11(a)	Detriment to Person or Property ~~(3/11/99)~~ (4/17/99)	~~State Only~~ Federally Enforceable
Regulation I: Section 9.13	Concealment and Masking Restricted (6/9/88)	~~State Only~~ Federally Enforceable
Regulation I: Section 9.15	Fugitive Dust Control Measures ~~(3/11/99)~~ (4/17/99)	Federally Enforceable
Regulation I: Section 9.16	Spray Coating Operations ~~(7/12/01)~~ (12/2/10)	Federally Enforceable
~~Regulation I: Section 9.16~~	~~Spray Coating Operations (10/28/10)~~	~~State Only~~
Regulation I: Section 9.18	Crushing Operations ~~(1/26/12)~~ (3/2/12)	~~State Only~~ Federally Enforceable
Regulation I: Section 9.20	Maintenance of Equipment (6/9/88)	Federally Enforceable
Regulation I: Section 15	Nonroad Engines (12/15/11)	State Only
Regulation II, Section 1.04	General Definitions (12/11/80)	Federally Enforceable
Regulation II, Section 1.05	Specialty Definitions ~~(7/24/03)~~ (9/1/03)	Federally Enforceable
Regulation II, Section 3.04	Motor Vehicle and Mobile Equipment Coating Operations ~~(7/24/03)~~ (9/1/03)	Federally Enforceable
Regulation III: Section 4.02	Asbestos Survey Requirements (6/8/95)	State Only
Regulation III: Section 4.03	Asbestos Notification Requirements (5/26/11)	State Only
Regulation III: Section 4.04	Asbestos Removal Requirements (7/13/00)	State Only
Regulation III: Section 4.05	Procedures for Asbestos Project (2/27/03)	State Only
Regulation III: Section 4.07	Disposal of Asbestos Material (6/8/95)	State Only

Section 6: General Applicable Requirements

Definitions

6.1 Unless otherwise defined in this permit, the terms used in this permit shall have the same meaning ascribed to them in the referenced regulation.

[WAC 173-401-200]

Retention of Records

6.2 Retention of records of all required monitoring data and support information for a period of five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

[WAC 173-401-615(2)(c)]

Asbestos

6.3 The permittee shall comply with 40 CFR Sections 61.145, 61.148 and 61.150 when conducting any renovation or demolition at the facility.

[40 CFR 61.145 and 150]

6.4 The permittee shall comply with Puget Sound Clean Air Agency Regulation III, Article 4 when conducting any asbestos project, renovation or demolition activities at the facility.

[PSCAA Regulation III, Article 4, State only]

Open Burning

6.5 It shall be unlawful for any person to cause or allow any outdoor burning unless the burning is in compliance with WAC 173-425.

[PSCAA Regulation I, Section 8.04]

6.6 No person shall conduct outdoor burning during an air pollution episode or a declared period of impaired air quality.

[WAC 173-425-050(3)]

6.7 Hand-held fire extinguishers training shall be conducted in accordance with PSCAA's Regulation I, Section 8.07.

[PSCAA Regulation I, Section 8.07, State only]

Stratospheric Ozone and Climate Protection

6.8 The permittee shall comply with the following standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

6.9 The permittee may switch from any ozone-depleting substance to any alternative approved pursuant to the Significant New Alternatives Program (SNAP), 40 CFR Part 82, Subpart G, without a permit revision but shall not switch to a substitute listed as unacceptable pursuant to such program.

[40 CFR 82.174]

6.10 Any certified technician employed by Kenworth shall keep a copy of their certification at their place of employment.

[40 CFR 82.166(1)]

6.11 The permittee shall not willfully release any regulated refrigerant and shall use refrigerant extraction equipment to recover regulated refrigerant when servicing, repairing or disposing of commercial air conditioning, heating, or refrigeration systems.

[RCW 70.94.970(2) and (4), State Only]

Chemical Accident Prevention Program

6.12 In accordance with 40 CFR Part 68.10, if the permittee has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, the permittee shall comply with the requirements of the Chemical Accident Prevention Provisions in 40 CFR Part 68 no later than the following dates:

a. Three years after the date on which a regulated substance is first listed under 40 CFR § 68.130; or

b. The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10]

Concealment or Masking

~~6.13 No person shall cause or allow the installation or use of any means which conceals or masks an emission of an air contaminant which would otherwise violate any provisions of WAC 173-400. (*Note: Once EPA deletes the 9/20/93 version of the WAC from the PSCAA SIP, only Regulation I, Section 9.13 will apply.)*~~

~~[WAC 173-400-040(8)]~~

6.14 It shall be unlawful for any person to cause or allow the installation or use of any device or use of any means which, without resulting in a reduction in the total amount of air contaminant emitted, conceals an emission of air contaminant which would otherwise violate this article.

[PSCAA Regulation I, Section 9.13(a)]

6.15 It shall be unlawful for any person to cause or allow the installation or use of any device or use of any means designed to mask the emission of an air contaminant which causes detriment to health, safety or welfare of any person.

[PSCAA Regulation I, Section 9.13(b)]

False Statement

6.16 No person shall make any false material statement, representation or certification in any form, notice or report required under chapter 70.94 or 70.120 RCW, or any ordinance, resolution, regulation, permit or order in force pursuant thereto.

[WAC 173-400-105(6)]

Tampering

6.17 No person shall render inaccurate any monitoring device or method required under chapter 70.94 or 70.120 RCW, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto.

[WAC 173-400-105(8)]

Adjustment for Atmospheric Conditions

6.18 The permittee shall not vary the rate of emission of a pollutant according to atmospheric conditions or ambient concentrations of that pollutant except as directed according to air pollution episode regulations.

[WAC 173-400-205]

Reasonably Available Control Technology (RACT)

6.19 Emission standards and other requirements contained in rules or regulatory orders in effect at the time of operating permit issuance or renewal shall be considered RACT for purposes of permit issuance or renewal.

[WAC 173-401-605(3)]

Annual Emission Report

6.20 The permittee shall report annually to the Puget Sound Clean Air Agency listing those air contaminants emitted during the previous calendar year that equal or exceed the following in tons per year:

Carbon monoxide (CO)	25
Facility combined total of all toxic air contaminants (TAC)	6
Any single toxic air contaminant (TAC)	2
Nitrogen oxide (NOX)	25
Particulate matter (PM10)	25
Particulate matter (PM2.5)	25
Sulfur oxide (SOX)	25
Volatile organic compounds (VOC)	25
Lead	0.5

Annual emission rates shall be reported to the nearest whole ton per year for only those air contaminants that equal or exceed the thresholds above, except lead which must be reported to the nearest tenth of a ton. The permittee shall maintain records of information necessary to document any reported emissions or demonstrate that the emissions were less than the above amounts. The permittee shall submit to the Puget Sound Clean Air Agency any additional information required by WAC 173-400-105(1) or Puget Sound Clean Air Agency Regulation III, Section 1.11.

[Puget Sound Clean Air Agency Regulation I, Section 7.09(a)]

Washington State Program for Reporting of Emissions of Greenhouse Gases

6.21 Greenhouse gases emission reporting is mandatory for the permittee of any facility that emits ten thousand metric tons CO2e or more per calendar year in total GHG emissions from all applicable source categories listed in WAC 173-441-120. If subject to mandatory reporting requirements, the permittee shall follow the procedures specified in WAC 173-441-050 for emission calculation, monitoring, quality assurance, missing data, recordkeeping, and reporting. The greenhouse gases emission report shall be submitted to either of the following:

For U.S. mail: Greenhouse Gas Report, Air Quality Program, Department of Ecology, P.O. Box 47600, Olympia, WA 98504-7600.

For e-mail: ghgreporting@ecy.wa.gov.

[WAC 173-441, State only]

Non-road Engines

6.22 The permittee shall file a Notice of Intent to Operate for non-road engine(s) that are subject to the notification requirements of WAC 173-400-035 and Puget Sound Clean Air Agency Regulation I, Article 15.

a. For nonroad engine with cumulative maximum rated brake horsepower >2000 BHP, the notification of intent to operate and approval is required before operations begin.

b. For nonroad engine with cumulative maximum rated brake horsepower >500 and ≤2000 BHP, the notification of intent to operate is required before operations begin.

[PSCAA Regulation I, Section 15.03 (b)(1) & (c)(1)]
[WAC 173-400-035 (4)(a) & (5)(a)]

6.23 The permittee must record the following information for each nonroad engine:

a. Site address or location;

b. Date of equipment arrival at the site;

c. Date of equipment departure from the site;

d. Engine function or purpose;

e. Identification of each component as follows:

i. Equipment manufacturer, model number and its unique serial number;

ii. Engine model year;

iii. Type of fuel used with fuel specifications (sulfur content, cetane number, etc.).

The permittee must keep the records of the current engine and equipment activity in hard copy or electronic form. These records can be maintained on-site or off-site for at least five years and must be readily available to the Puget Sound Clean Air Agency on request.

[WAC 173-400-035 (4)(b), (4)(c) & (5)(c)]
[PSCAA Regulation I, Section 15.03 (b)(2), (b)(3) & (c)(3)]

6.24 All nonroad engines must use ultra-low sulfur diesel or ultra-low sulfur bio-diesel (a sulfur content of 15 ppm or 0.0015% sulfur by weight or less), gasoline, natural gas, propane, liquefied petroleum gas (LPG), hydrogen, ethanol, methanol, or liquefied/compressed natural gas (LNG/CNG). A facility that receives deliveries of only ultra-low sulfur diesel or ultra-low sulfur bio-diesel is deemed to be compliant with this fuel standard.

[WAC 173-400-035 (3)]
[PSCAA Regulation I, Section 15.05(a)]

Section 7: Reference Test Methods and Averaging Periods

Unless otherwise specified in the rules or approval conditions, compliance shall be determined based on the averaging periods as described in the table below. In the event that a sample is accidentally lost or conditions occur in which one of the runs must be discontinued because of circumstances beyond the operator's control, compliance may, upon EPA or Puget Sound Clean Air Agency approval, be determined from the arithmetic average of the two other runs.

Table 15. Summary of Test Methods

Test Method	Title	Averaging Period
Puget Sound Clean Air Agency Method 5 Puget Sound Clean Air Agency Board Resolution 540, August 11, 1983	Determination of Particulate Emissions from Stationary Sources	The test shall consist of 3 runs and at least 1-hour per run. Determine the PM emission from the arithmetic average of the three runs.
EPA Method 5 40 CFR 60, Appendix A	Determination of Particulate Emissions from Stationary Sources	The test shall consist of 3 runs and at least 1-hour per run. Determine the PM emission from the arithmetic average of the three runs.
EPA Method 6C 40 CFR 60, Appendix A	Determination of Sulfur Dioxide Emissions from Stationary Sources	The test shall consist of 1 run and at least 1-hour per run.
EPA Method 7 40 CFR 60, Appendix A	Determination of Nitrogen Oxide Emissions from Stationary Sources	The test shall consist of 3 runs and at least 1-hour per run. Determine the NOx emission from the arithmetic average of the three runs.
EPA Method 10 40 CFR 60, Appendix A	Determination of Carbon Monoxide	The test shall consist of 3 runs and at least 1-hour per run. Determine the NOx emission from the arithmetic average of the three runs.
EPA Method 19 40 CFR 60, Appendix A	Determination of NOx rate	30-day rolling average
Ecology Method 9A, "Source Test Manual – Procedures for Compliance Testing", July 12, 1990	Visual Determination of the Opacity of Emissions from Stationary Sources - for State and Puget Sound Clean Air Agency requirements	Any 13 opacity readings above standard in one hour, opacity readings taken in 15-second intervals.
EPA Method 9 40 CFR 60, Appendix A	Visual Determination of the Opacity of Emissions from Stationary Sources - for Federal Requirements	6-minute averaging period, opacity readings taken in 15-second intervals.

Test Method	Title	Averaging Period
EPA Method 24 40 CFR 60, Appendix A	Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings	For water-based and water reducible coatings, vendor certification or data will be used for determining compliance. For other VOC containing materials, vendor certification or data will be the primary means for determining compliance. If Method 24 is used for coatings, grab samples will be taken and the average of all of a single type of coating (e.g., primer or topcoat), mixed and ready for application within the same coating operation, will be used for determining compliance.
EPA Method 26 A 40 CFR 60, Appendix A	Determinations of HCl	The test shall consist of 1 run and at least 1-hour per run.
Ash-ASTM D482 Sulfur –ASTM D3120 Halogens – EPA SW846,9076 PCB – EPA SW846, 8080 Lead – EPA 600/4-81-045,200.7 Flash Point – EPA SW846, 1020	Fuel Oil Analysis	None applicable

Section 8: Inapplicable Requirements

Pursuant to WAC 173-401-640(2), the Puget Sound Clean Air Agency has determined that the requirements listed in the table do not apply to the facility, as of the date of permit issuance, for the reasons specified. The permit shield applies to all requirements so identified.

Table 16. Inapplicable Requirements

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	Standards of Performance for VOC Storage Vessels	Does 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 Regulatory Order 11587 (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 Regulatory Order 11587 (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 Regulatory Order 11587 (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 Regulatory Order 11587 (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.
40 CFR 82, Subpart A		Controls on production and consumption of ozone-depleting substances. Kenworth does not produce or consume ozone depleting substances and would need approval to do so.
40 CFR 82, Subpart B		Motor vehicle air conditioners are serviced by trained and certified technicians using approved refrigerant recycling equipment. Kenworth does not service or repair motor vehicle air conditioners. Trucks on the assembly line are excluded from the definition of "motor vehicle" in 40 CFR 82.32(c).
40 CFR 82, Subpart D		Federal procurement requirements. Kenworth is not a federal agency.
40 CFR 82, Subpart E		Labeling required for containers of products containing certain ozone-depleting substances. Kenworth does not use Class I substances directly in manufacturing processes or does not manufacture products containing Class I substances and would have to apply for approval before using a Class I CFC.
WAC 173-400-105(5)	Continuous Emission Monitoring System requirements	Continuous Emission Monitoring System requirements are inapplicable since Kenworth is not required to use continuous emission monitors to assure compliance.
WAC 173-490-030	Registration requirements	Operating permit sources are exempt from registration under RCW 70.94.161(17).
Puget Sound Clean Air Agency Reg. I: 5.03	Registration Requirements	Puget Sound Clean Air Agency Regulation I, Section 5.03 is inapplicable per statute RCW 70.94.161(17). Kenworth specifically requested that Puget Sound Clean Air Agency determine that Section 5.03 does not apply to welding operations. Puget Sound Clean Air Agency concurs, and also notes that welding operations are exempt from the new source requirements of Puget Sound Clean air Agency Regulation I, Article 6.

Regulation	Description	Basis for Inapplicability
Puget Sound Clean Air Agency Reg. I: 9.04	Continuous Opacity Monitoring systems requirements	Does not apply since Kenworth is not required to use a continuous opacity monitoring system to assure compliance.
Puget Sound Clean Air Agency Reg. I: 9.16(e)		No mobile spray-coating operations conducted at the facility.
Puget Sound Clean Air Agency Reg. I, Article 12	Continuous Emission Monitoring System requirements	Continuous Emission Monitoring System requirements are inapplicable since Kenworth is not required to use continuous emission monitors to assure compliance.
Order of Approval No. 6074 (8/16/95)		Cancelled and superseded by Order of Approval 6074, 8/8/03
Order of Approval No. 6977 (10/21/97)		Cancelled and superseded by Order of Approval 6074, 8/8/03
General Regulatory Order No. 6654 (4/10/97)		Cancelled and superseded by Order of Approval 6074, 8/8/03
Order of Approval No. 6074, Condition 5 (8/8/03)	Annual status report for VOC limits	On August 15, 2001 Kenworth Renton submitted a letter to PSCAA stating that according to Section V.Q.4 of the (August 24, 2000) permit, primers had achieved 3.5 lbs/gal VOC content, and chassis primer with 2.7 lbs/gal VOC content was acceptable for use. Therefore continued annual status reporting was no longer required.
Order of Approval No. 6074 (8/8/03)		Cancelled and superseded by Regulatory Order 11587 (1/16/19)
Order of Approval No. 8884 (7/24/03)		Cancelled and superseded by Regulatory Order 11587 (1/16/19)
Order of Approval No. 8344 (7/24/03)		Cancelled and superseded by Regulatory Order 11587 (1/16/19)

Section 9: Insignificant Emission Units and Activities

General

9.1 For the purpose of this permit, an emission unit or activity is insignificant based on one or more of the following:

a. Actual emissions of all regulated air pollutants from a unit or activity are less than the emission thresholds established in WAC 173-401-530(4).

b. The emission unit or activity is listed in WAC 173-401-532 as categorically exempt.

c. The emission unit or activity is listed in WAC 173-401-533 and is considered insignificant if its size or production rate based on maximum rated capacity is below the specified level.

d. The emission unit or activity generates only fugitive emissions as defined in WAC 173-400-030(31).

[WAC 173-401-530(1)]

9.2 No emissions unit or activity subject to a federally enforceable applicable requirement (other than generally applicable requirements of the state implementation plan) shall qualify as an insignificant emissions unit or activity. Generally applicable requirements of the state implementation plan are those federally enforceable requirements that apply universally to all emission units or activities without reference to specific types of emission units or activities.

[WAC 173-401-530(2)(a)]

9.3 This permit does not require testing, monitoring, recordkeeping or reporting for insignificant emission units or activities, except as required by Puget Sound Clean Air Agency Regulation I, Sections 7.09(b) and 9.20 and their incorporation into this permit. Compliance with Puget Sound Clean Air Agency Regulation I, Sections 7.09(b) and 9.20 as defined in the terms of this permit, shall be deemed to satisfy the requirements of WAC 173-401-615 and 173-401-630(1).

[WAC 173-401-530(2)(c)]

9.4 Insignificant emission units and activities are subject to all General Applicable Requirements set forth in Section 6 of this permit. Where this permit does not require testing, monitoring, recordkeeping and reporting for insignificant emissions units or activities, the permittee may certify continuous compliance if there were no observed, documented, or known instances of noncompliance during the reporting period. Where this permit requires testing, monitoring, recordkeeping and reporting for insignificant emission units or activities, the permittee may certify continuous compliance when the testing, monitoring, and recordkeeping required by the permit revealed no violations during the period, and there were no observed, documented, or known instances of noncompliance during the reporting period.

[WAC 173-401-530(2)(d)]

Documentation

9.5 Upon request from PSCAA the permittee must provide sufficient documentation to enable PSCAA to determine that the emission unit or activity has been appropriately listed as insignificant.

[WAC 173-401-530(5)(a)]

9.6 Upon request from PSCAA, at any time during the term of the permit, if the permittee lists an activity or emissions unit as insignificant under Condition No. 9.1(a) of this section then upon request from PSCAA the permittee shall demonstrate to PSCAA that the actual emissions of the unit or activity are below the emission thresholds listed in WAC 173-401-530(4).

[WAC 173-401-530(5)(b)]

Permit Revision

9.7 An activity or emissions unit that qualifies as insignificant solely on the basis of Condition No. 9.1(a) of this section shall not exceed the emissions thresholds specified in WAC 173-401-530(4), until the permit is modified pursuant to WAC 173-401-725.

[WAC 173-401-530(6)]

Table 17. Insignificant Emission Units Based on Maximum Rated Capacity

The following units and activities are listed as insignificant based on maximum rated capacity per WAC 173-401-533.	
Description	**WAC 173-401-533(2)**
Make-Up Air Units (MAU): natural gas fired and less than five million Btu/hr.	WAC 173-401-533(2)(e)
Air Supply Houses (ASH): natural gas fired and less than five million Btu/hr.	WAC 173-401-533(2)(e)
Cab Washer Burners: natural gas fired and less than five million Btu/hr.	WAC 173-401-533(2)(r)
Hot Water Heaters: 2 @ 85 gallons each. Natural gas fired, each at less than five million Btu/hr.	WAC 173-401-533(2)(r)
Portable Pressure Washer: propane fired and less than five million Btu/hr.	WAC 173-401-533(2)(r)
Pressure Washers: 2 (paint booth & cleaning pit), natural gas fired. Each at less than five million Btu/hr.	WAC 173-401-533(2)(r)
Welding equipment: Less than 1 ton per day of welding rod is used.	WAC 173-401-533(2)(i)
Two Diesel Fuel Aboveground Storage Tanks, 1 @ 5,000 gallons and 1 @ 7,500 gallons: Tank capacity is less than ten thousand gallons and stores a VOC with a vapor pressure less than 80mm Hg at 21C.	WAC 173-401-533(2)(c)
Fire Pump Diesel Tank, 320 gallons: Tank capacity is less than ten thousand gallons and stores a VOC with a vapor pressure less than 80mm Hg @ 21C.	WAC 173-401-533(2)(c)
Emergency Generator Diesel Fuel Tank, 210 gallons: Tank capacity is less than 260 gallons.	WAC 173-401-533(2)(a)
Propane Tank, 1,000 gallons.	WAC 173-401-533(2)(d)
Antifreeze Aboveground Storage Tank, 5,000 gallons: Tank capacity is less than ten thousand gallons and stores a VOC with a vapor pressure less than	WAC 173-401-533(2)(c)

The following units and activities are listed as insignificant based on maximum rated capacity per WAC 173-401-533.	
Description	**WAC 173-401-533(2)**
80mm Hg at 21C.	
Auto Transmission Fluid Aboveground Storage Tank, 1,000 gallons: Contains lubricating oil. Tank capacity is less than ten thousand gallons and stores a VOC with a vapor pressure less than 80mm Hg at 21C.	WAC 173-401-533(2)(c)
Solvent Recovery Unit, 200 gallons	WAC 173-401-533(2)(a)
Recovered Solvent Tank, 500 gallons HAP-free solvent with vapor pressure ≤ 550 mm Hg	WAC 173-401-533(2)(b)
Waste Solvent Tank, 500 gallons HAP-free solvent with vapor pressure ≤ 550 mm Hg	WAC 173-401-533(2)(b)
Solvent Mixing/Storage Tank, 1,000 gallons HAP-free solvent with vapor pressure ≤ 550 mm Hg	WAC 173-401-533(2)(b)
Paint Mix Room Thinner Tank, 1,000 gallons HAP-free solvent with vapor pressure ≤ 550 mm Hg	WAC 173-401-533(2)(b)
Chassis Black Tank, 750 gallons HAP-free paint with vapor pressure ≤ 80 mm Hg	WAC 173-401-533(2)(b) WAC 173-401-533(2)(c)
Paint Activator Tank, 350 gallons, Vapor pressure ≤ 80 mm Hg	WAC 173-401-533(2)(c)
Paint Tanks, 7 @ 80 gallons each	WAC 173-401-533(2)(a)
Off-Highway Axle Weld Fume Collector	WAC 173-401-533(2)(i)
Small Electrical Power Generators: gasoline fired.	WAC 173-401-533(2)(f)
Small Parts Cleaner Tanks	WAC 173-401-533(2)(a) and WAC 173-401-533(2)(z)

Table 18. Categorically Exempt Insignificant Emission Units

The following units and activities are listed as categorically exempt insignificant emission units per WAC 173-401-532.	
Description	**WAC 173-401-532**
Cab Washer Dry-off Oven: Vent is located in building that contains permitted emissions units and activities from which local ventilation, controls and separate exhaust are provided.	WAC 173-401-532(9)
Lab Fume Hoods: Hood vents are located in building that contains permitted emissions units and activities from which local ventilation, controls and separate exhaust are provided.	WAC 173-401-532(9)
Motor Oil Aboveground Storage Tank: Contains lubricating oil.	WAC 173-401-532(3)
Gear Oil Aboveground Storage Tank: Contains lubricating oil.	WAC 173-401-532(3)
Axle Oil Aboveground Storage Tank: Contains lubricating oil.	WAC 173-401-532(3)
Frame Rail Washer Tank: 200 gallons, water, closed.	WAC 173-401-532(4)
Pressure Washer tanks: 2 @ 50 gallons each, water.	WAC 173-401-532(4)
Fire Protection Water Tank: 300,000 gallons, water	WAC 173-401-532(52) and WAC 173-401-532(4)
Welding Exhaust Dust Collectors: Collect particulate emissions from welding of metal. Activity is performed indoors with particulate emission control. The exhaust is within the building housing the activity and no fugitive particulate emissions enter the environment.	WAC 173-401-532(55)
Small Parts Blast Booth: Sanding, buffing, blasting of metals and plastics. Activity is performed indoors with particulate emission control. The exhaust is within the building housing the activity and no fugitive particulate emissions enter the environment.	WAC 173-401-532(55)
Paint Exhaust (Paint Mix Room, Paint Storage Room, Paint Day Room, Thinner Recycling Room, Hazardous Waste Room, Hazardous Materials Storage Room): Vents are located in building that contains permitted emissions units and activities from which local ventilation, controls and separate exhaust are provided.	WAC 173-401-532(9)
Thinner Sink Exhaust: Vent is located in building that contains permitted emissions units and activities from which local ventilation, controls and separate exhaust are provided.	WAC 173-401-532(9)
Vehicle exhaust from exhaust hoods and fume extractors at engine start-up, end-of-line, final assembly, test department, and dynamometer: Exhaust is from a mobile source powered by an internal combustion engine	WAC 173-401-532(10)
Paint Activator Totes: 259 gallons each, portable.	WAC 173-401-532(42)
Chassis Black Totes: 500 gallons each, portable.	WAC 173-401-532(42)
Battery Wash Tank, contaminated water, closed, 125 gallons.	WAC 173-401-532(4)
Moly Grease Tote, 379 gallons, portable.	WAC 173-401-532 (4), (42), and (69).

The following units and activities are listed as categorically exempt insignificant emission units per WAC 173-401-532.	
Description	**WAC 173-401-532**
Antifreeze Totes, (ethylene glycol), 275 gallons, portable.	WAC 173-401-532 (42)
Antifreeze Tank, (ethylene glycol), closed, 100 gallons.	WAC 173-401-532 (4)
Refrigerant Tanks, (R-134a): 2,000 pounds each, portable.	WAC 173-401-532 (42)
Nitrogen Tank, pressurized, 200 gallons.	WAC 173-401-532 (5)
Paint Booth Maskant Tank, closed, 200 gallons.	WAC 173-401-532 (4)
Waterwash Paint Booth Sump, contaminated water, sludge collection, 12,500 gallons	WAC 173-401-532(114)
Stormwater Storage Tank, closed, 15,000 gallons.	WAC 173-401-532 (4)
Wastewater Effluent Tank, closed, treated wastewater, 3,000 gallons.	WAC 173-401-532 (94)
Wastewater Batch Tanks (2), closed, contaminated wastewater, 65,000 gallons each.	WAC 173-401-532 (94)
Sand Filter, treated wastewater, 4,500 gallons.	WAC 173-401-532(114)
Gravity Settler, treated wastewater, 15,000 gallons.	WAC 173-401-532(114)
Oil/Water Decant Tank, closed, contaminated wastewater, 3,000 gallons.	WAC 173-401-532 (94)
Oil/Water Separator, closed, contaminated wastewater, 1,000 gallons.	WAC 173-401-532 (94)
Oil/Water Separator Filtrate Tank, contaminated wastewater, 90 gallons.	WAC 173-401-532 (94)
Wastewater Chemical Treatment Tank, contaminated wastewater, 3,000 gallons.	WAC 173-401-532 (94) and (114)
Filter Press Tank, wastewater treatment sludge, 150 gallons.	WAC 173-401-532 (94) and (114)
Sludge Tank, wastewater treatment sludge, 5,000 gallons.	WAC 173-401-532 (94) and (114)
Coagulant Drum, wastewater treatment chemical, 55 gallons, portable	WAC 173-401-532 (42)
Lime Slurry Tank, closed, wastewater treatment chemical, 90 gallons.	WAC 173-401-532 (4)
Polymer Tank, closed, wastewater treatment chemical, 90 gallons.	WAC 173-401-532 (4)
Coagulant Drum, wastewater treatment chemical, 55 gallons, portable.	WAC 173-401-532 (42)
Sodium Hydroxide Tote, closed, wastewater treatment chemical.	WAC 173-401-532 (4)
Sulfuric Acid Tote, closed, wastewater treatment chemical.	WAC 173-401-532 (4)

The following units and activities are listed as categorically exempt insignificant emission units per WAC 173-401-532.	
Description	**WAC 173-401-532**
Reverse Osmosis Water Tank, closed, 3,297 gallons.	WAC 173-401-532 (94)
5% Sulfuric Acid Tank, closed, wastewater treatment chemical, 50 gallons.	WAC 173-401-532 (4)
Cooling Water Pumping Unit, non-contact cooling water, 2,230 gallons.	WAC 173-401-532 (121)
Cooling Tower, non-contact cooling water, 3,000 gallons.	WAC 173-401-532 (121)
Truck Leak Test Water Tank, closed, wastewater, 800 gallons.	WAC 173-401-532 (94)
Waste Antifreeze Tank: closed, 200 gallons.	WAC 173-401-532 (4)

Attachment 1. PSCAA Method 5 for Particulate

RESOLUTION NO. 540

RESOLUTION OF THE BOARD OF DIRECTORS
OF THE PUGET SOUND AIR POLLUTION
CONTROL AGENCY ADOPTING MODIFIED
PARTICULATE SOURCE TEST PROCEDURES

WHEREAS, Regulation I Section 9.09(f) requires procedures for source sampling performed in connection with standards of Regulation I and II for particulate and gases to be done using current Environmental Protection Agency requirements or procedures and definitions adopted by the Board; and

WHEREAS, to conform to current safe and less toxic chemical storage, the particulate measurement procedures currently used by the Agency have been proposed for modification; and

WHEREAS, the Expanded Advisory Council reviewed and approved said source test laboratory procedure modifications; and

WHEREAS, a public hearing was held by the Puget Sound Air Pollution Control Agency Board of Directors on August 11, 1983, to allow public input and critique on the proposal; and

WHEREAS, the Board deems it necessary to adopt said modification to source test procedures; now therefore,

BE IT RESOLVED BY THE BOARD OF PUGET SOUND AIR POLLUTION CONTROL AGENCY:

The Board of Directors does hereby adopt the modifications to the source test procedures, a copy of which is attached hereto and made a part hereof.

PASSED AND APPROVED by the Board of Directors of the Puget Sound Air Pollution Control Agency held this 11th day of August, 1983.

PUGET SOUND AIR POLLUTION CONTROL AGENCY

By _____
Chairman

Attest:

_____
Air Pollution Control Officer

Approved as to form:

_____
Agency Attorney

Proposed Revised PSAPCA

Particulate Source Test Procedures

Engineering Division

Puget Sound Air Pollution Control Agency
200 West Mercer Street, Room 205
P.O. Box 9863
Seattle, Washington 98109

June 9, 1983

I. Procedures for Particulate Source Sampling

Unless otherwise authorized by the Control Officer, all particulate source sampling performed to demonstrate compliance with the emission standards of Regulation I shall be done using current Environmental Protection Agency Methods 1-5 contained in 40 CFR Part 60, Appendix A, as modified in Section II of this document.

II. Procedure for Determining Particulate Matter in the Impinger Catch (Back Half)

The analysis and calculations for Method 5 shall conform to that described by EPA in the current 40 CFR Part 60, Appendix A, except that the back half catch shall be included as particulate matter. The back half weight is the sum of the impinger catch (organic and inorganic) and the back half acetone rinse weights.

A. Sample Recovery of the Back Half

1. Purging

Whenever SO_2 interference is suspected, purge the impingers immediately after the test run is complete with N_2 or clean air for a minimum of one-half the sample volume.

2. Impinger Liquid

Measure the volume of water collected in all impingers and place the water from the first three impingers in a container. Thoroughly rinse all sample-exposed surfaces between the filter and fourth impinger with water and place in above container.

3. Acetone Rinse

Thoroughly rinse all sample-exposed surfaces between the filter and the fourth impinger with acetone and place the washings in a tared beaker to dry.

B. Analysis of the Back Half

1. Impinger Liquid Extraction

a. Add 50-100 ml of dichloromethane to the impinger liquid.

b. Spin for at least ten minutes.

c. Pour the liquid into a separatory funnel and drain the organic phase into a tared beaker (organic fraction).

d. Drain the remaining liquid into a beaker and repeat Steps a, b, and c. Perform the extraction several times with fresh dichloromethane until the organic fraction is clear. Keep each organic extraction in a separate beaker.

e. Following the last extraction, drain the remaining liquid from the separatory funnel into a tared beaker (inorganic fraction).

f. Allow the organic fraction beakers to dry under a hood at room temperature.

g. Evaporate the inorganic fraction in such a manner that the beaker contents do not become exposed to temperatures greater then 212°F.

h. Dry weighed beakers containing a sample of the acetone, dichloromethane and a sample of distilled deionized water to check for blank weight.

i. Desiccate organic, inorganic and blank beakers for at least 24 hours at room temperature in a disiccator containing silica gel. Weigh to a constant weight and report the results to the nearest 0.1 mg. Constant weight is defined in Section 4.3 of Method 5.

2. Back Half Acetone Rinse

a. Dry the acetone rinse in a hood at room temperature.

b. Desiccate and weigh the beaker to constant weight and record.

C. Reagents

1. Water

Use distilled deionized water in the impingers and to rinse all glassware.

2. Acetone

Use reagent grade, $\leq$ 0.001 percent residue in glass bottles.

3. Dichloromethane

Use reagent grade, $\leq$ 0.001 percent residue in glass bottles.

Attachment 2. Ecology Method 9A

Revised July 12, 1990

STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

SOURCE TEST METHOD 9A

VISUAL DETERMINATION OF OPACITY FOR A THREE MINUTE STANDARD

1. Principle

The opacity of emissions from stationary sources is determined visually by a qualified observer.

2. Procedure

The observer must be certified in accordance with the provisions of Section 3 of 40 CFR Part 60, Appendix A, Method 9, as in effect on July 1, 1990, which are hereby adopted by reference.

The qualified observer shall stand at a distance sufficient to provide a clear view of the emissions with the sun oriented in the 140° sector to his back. Consistent with maintaining the above requirement, the observer shall, as much as possible, make his observations from a position such that his line of vision is approximately perpendicular to the plume direction, and when observing opacity of emissions from rectangular outlets (e.g., roof monitors, open baghouses, noncircular stacks), approximately perpendicular to the longer axis of the outlet. The observer's line of sight should not include more than one plume at a time when multiple stacks are involved, and in any case, the observer should make his observations with his line of sight perpendicular to the longer axis of such a set of multiple stacks (e.g., stub stacks on baghouses).

The observer shall record the name of the plant, emission location, type of facility, observer's name and affiliation, and the data on a field data sheet. The time, estimated distance to the emission location, approximate wind direction, estimated wind speed, description of the sky condition (presence and color of clouds), and plume background are recorded on a field data sheet at the time opacity readings are initiated and completed.

The observer should make note of the ambient relative humidity, ambient temperature, the point in the plume that the observations were made, the estimated depth of the plume at the point of observation, and the color and condition of the plume. It is also helpful if pictures of the plume are taken.

Opacity observations shall be made at the point of greatest opacity in the portion of the plume where condensed water vapor is not present. The observer shall not look continuously at the plume, but instead shall observe the plume momentarily at 15-second intervals.

When condensed water vapor is present within the plume as it emerges from the emission outlet, opacity observations shall be made beyond the point in the plume at which condensed water vapor is no longer visible.

When water vapor in the plume condenses and becomes visible at a distinct distance from the emission outlet, the opacity of emissions should be evaluated at the emission outlet prior to the condensation of water vapor and the formation of the steam plume.

Opacity observations shall be recorded to the nearest 5 percent at 15-second intervals on an observational record sheet. Each momentary observation recorded shall be deemed to represent the average opacity of emissions for a 15-second period.

3. Analysis

The opacity of the plume is determined by individual visual observations. Opacity shall be reported as the range of values observed during a specified time period, not to exceed 60 consecutive minutes. The opacity standard is exceeded if there are more than 12 observations, during any consecutive 60-minute period, for which an opacity greater than the standard is recorded.

4. References

Federal Register, Vol. 36, No. 247, page 24895, Dec. 23, 1971.

"Criteria for Smoke and Opacity Training School 1970-1971" Oregon-Washington Air Quality Committee.

"Guidelines for Evaluation of Visible Emissions" EPA 340/1-75-007.