



**TECHNICAL SUPPORT DOCUMENT**

**Air Discharge Permit 10-2923  
Air Discharge Permit Application CO-864**

**Stirling Auto Body  
SWCAA ID – 2200**

**Final Date: March 31, 2010**

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## TABLE OF CONTENTS

1. FACILITY IDENTIFICATION .....	1
2. FACILITY DESCRIPTION .....	1
3. CURRENT PERMITTING ACTION.....	1
4. PROCESS DESCRIPTION .....	1
5. EQUIPMENT/ACTIVITY IDENTIFICATION .....	1
6. EMISSIONS DETERMINATION .....	2
7. REGULATIONS AND EMISSION STANDARDS .....	4
8. RACT/BACT/BART/LAER/PSD/CAM DETERMINATIONS.....	6
9. AMBIENT IMPACT ANALYSIS .....	7
10. DISCUSSION OF APPROVAL CONDITIONS .....	7
11. START-UP AND SHUTDOWN/ALTERNATIVE OPERATING SCENARIOS/POLLUTION PREVENTION.....	8
12. EMISSION MONITORING AND TESTING.....	9
13. FACILITY HISTORY .....	9
14. PUBLIC INVOLVEMENT OPPORTUNITY .....	9

## ABBREVIATIONS

ACFM	Actual cubic foot per minute
ADP	Air Discharge Permit (Same as Order of Approval)
AP-42	<u>Compilation of Emission Factors, AP-42, Fifth Edition, Volume 1, Stationary Point and Area Sources</u> – published by the US Environmental Protection Agency
ASIL	Acceptable Source Impact Level from WAC 173-460
BACT	Best Available Control Technology
BART	Best Available Retrofit Technology
CAM	Compliance assurance monitoring (40 CFR 64)
CAS #	Chemical Abstract Service number
cfm	Cubic feet per minute
CFR	Code of Federal Regulations
CO	Carbon monoxide
EPA	U.S. Environmental Protection Agency
gr/scf	Grains per dry standard cubic foot (68 °F, 1 atmosphere)
HAP	Hazardous air pollutant listed pursuant to Section 112 of the Federal Clean Air Act
HVLP	High volume low pressure (referring to a type of spray coating gun)
LAER	Lowest achievable emission rate
lb/yr	Pounds per year
lbs	Pounds
MSDS	Material safety data sheet
NO <sub>x</sub>	Nitrogen oxides
NOC	Notice of Construction application (same as Air Discharge Permit application)
PM	Total particulate matter (includes both filterable particulate matter measured by EPA Method 5 and condensable particulate matter measured by EPA Method 202)
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to 10 micrometers (includes both filterable particulate matter measured by EPA Method 201 or 201A and condensable particulate matter measured by EPA Method 202)
PM <sub>2.5</sub>	Particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers (includes both filterable particulate matter measured by EPA Method 201 or 201A and condensable particulate matter measured by EPA Method 202)
PSD	Prevention of Significant Deterioration
RACT	Reasonably Available Control Technology
RCW	Revised Code of Washington
scfm	Standard (68°F, 1 atmosphere) cubic feet per minute
SQER	Small Quantity Emission Rate listed in WAC 173-460
SO <sub>2</sub>	Sulfur dioxide
SWCAA	Southwest Clean Air Agency
TAP	Toxic Air Pollutant pursuant to Chapter 173-460 WAC
T-BACT	Best Available Control Technology for toxic air pollutants
tpy	Tons per year
VOC	Volatile Organic Compound
WAC	Washington Administrative Code

## 1. FACILITY IDENTIFICATION

Applicant Name: Stirling Auto Body  
Applicant Address: PO Box 1077, Longview, WA 98632

Facility Name: Stirling Auto Body  
Facility Address: 1151 Vandercook Way, Longview, WA 98632

Contact Person: Bob Page, Body Shop Manager

SWCAA Identification: 2200

Primary Process: Automotive body paint and repair  
SIC/NAICS Code: 7532: Automotive Repair, Services and Parking  
811121: Automotive Body, Paint, and Interior Repair/Maintenance  
Facility Classification: Natural Minor

## 2. FACILITY DESCRIPTION

Stirling Auto Body (Stirling) operates an auto body repair and painting operation. A paint mixing room, vehicle preparation station, and a paint booth with a heated make-up unit are at this location.

## 3. CURRENT PERMITTING ACTION

This permitting action is in response to Air Discharge Permit (ADP) application number CO-864 dated November 4, 2008. Stirling submitted ADP Application CO-864 requesting the following:

- Approval to install and operate an auto body repair and painting operation.

This permitting action will establish emission limits, operating conditions, monitoring, recordkeeping, and reporting requirements for this activity at this facility.

## 4. PROCESS DESCRIPTION

Stirling operates a paint mixing room, a vehicle preparation station, and a paint booth with a heated make-up unit. The vehicle preparation station and the spray booth are vented through fabric filters to control particulate matter emissions. Paint is applied with HVLP or other high transfer efficiency spray guns.

## 5. EQUIPMENT/ACTIVITY IDENTIFICATION

- 5.a. Paint Booth. The booth measures 13' 7" by 27' by 10'10" and exhaust is vented through six separate filter panels each containing 26 ft<sup>2</sup> of overspray filters. PM filtration is provided by 40" by 104" by ¾" particulate filter panels with a minimal removal efficiency of 98%. The paint booth is exhausted vertically by a 10 hp fan. Paint is applied using high transfer efficiency guns (~65% or better).

The auto body shop paint booth includes a Garmat USA natural gas-fired heated make-up air unit (model 99275; s/n A0196E003317), rated at 1.0 MMBtu/hr. Airflow through the unit is 14,200 scfm. The combustion products are vented into the paint booth and out the paint booth's existing stack. The unit meets or exceeds the American National Standards Institute (ANSI) Standard Z83.18b-1989 for non-recirculating direct gas-fired industrial air heaters of 3 ppm nitrogen oxides (NO<sub>x</sub>), 25 ppm carbon monoxide (CO), and 2500 ppm carbon dioxide (CO<sub>2</sub>).

Stack Height: ~31' from ground, vertical, ~11' above roof level  
 Stack Diameter: 25" round  
 Stack Temperature: 68°F (ambient) when not heated  
 Flow: 14,200 scfm

5.b. Paint Mixing Room. The room measures 15' 9" by 13' 6" by 9'. Exhaust air from the room will be discharged vertically through a dedicated 12" diameter stack. The exhaust system has an airflow of ~1,000 acfm.

5.c. Vehicle Preparation Station. The booth measures 13' 7" by 14' 4" by 9' 2" and exhaust is vented through 24 separate filter panels of overspray filters. PM filtration is provided by 20" by 20" by 2.5" Superior Glass Fibers (fiberglass) particulate filter panels, model PA-14. Filters have an average removal efficiency of 99.3%. The paint booth is exhausted vertically by a 2 hp Leeson fan.

Stack Height: ~25' from ground, vertical, ~4' above roof level  
 Stack Diameter: 36"  
 Stack Temperature: 68°F (ambient)  
 Flow: 16,000 acfm

5.d. Equipment/Activity Summary.

ID No.	Generating Equipment/Activity	# of Units	Control Equipment	# of Units
1	Paint Spray Booth with Heater	1	1) Process Enclosure; 2) High Efficiency Particulate Filters; 3) HVLP Spray Guns or Air-Assisted Airless Configurations; and 4) Low Sulfur Fuel (Natural Gas)	1
2	Paint Mixing Room	1	None	N/A
3	Vehicle Preparation Station	1	1) Process Enclosure; and 2) Primary and Secondary Fabric Filtration 3) HVLP Spray Guns or Air-Assisted Airless Configurations	1

## 6. EMISSIONS DETERMINATION

Emissions to the ambient atmosphere from the new auto body repair and painting operation, as proposed in ADP Application CO-864, consist of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), volatile organic

Pollutant	CAS #	Category	Emissions (lb/yr)	WAC 173-460 SQER (lbs/yr)
VOCs	---	---	2857.1	---
PM <sub>10</sub>	---	---	63.42	---
Acetone	67-64-1	TAP B	167.64	43,748
Ethyl Acetate	141-78-6	TAP B	50.98	
n-Butyl Acetate	123-86-4	TAP B	293.48	43,748
n-Butyl Alcohol	71-36-3	TAP B	8.8	43,748
Aluminum	7429-90-5	TAP B	17.44	
Ethyl Benzene	100-41-4	HAP/TAP B	65.68	43,748
Methyl Ethyl Ketone	78-93-3	TAP B	124.20	
Methyl Amyl Ketone	110-43-0	TAP B	179.85	
Methyl Isoamyl Ketone	110-12-3	TAP B	1.75	43,748
Methyl Isobutyl Ketone	108-10-1	HAP/TAP B	64.15	43,748
n-Propanol	71-23-8	TAP B	0.73	43,748
Toluene	108-88-3	HAP/TAP B	308.97	43,748
Xylenes	1330-20-7	HAP/TAP B	490.25	43,748
Heptane	142-82-5	TAP B	16.04	
Hexemethylene 16Diisocyanate	822-06-0	HAP/TAP B	1.87	
Isobutyl Acetate	110-190	TAP B	13.87	43,748

compounds (VOC), particulate matter (PM), sulfur dioxide (SO<sub>2</sub>), toxic air pollutants (TAPs), and hazardous air pollutants (HAPs).

- 6.a. Spray Booth. Emissions of VOC, TAPs and HAPs from spray coating operations were calculated using MSDS information for individual coating products, material consumption proposed by the applicant. PM<sub>10</sub> emissions were determined using tons of coating sprayed, 50% solids content, a minimum filter arrestance of 98% and transfer efficiencies.

Actual annual emissions will be calculated using annual material purchases, MSDS data, filter efficiencies and transfer efficiency for spray applied coatings.

- 6.b. Spray Booth Heater. Maximum emissions from natural gas combustion from the booth heater is calculated based on emission factors from AP-42 Section 1.4 "Natural Gas Combustion" (7/98), a heat input of 1.0 MMBtu/hr and 8,760 hours of operation per year. Actual emissions will likely be substantially less.

Booth Heating Emission Estimates				
Pollutant	Emission Estimate	Emission Factor (lb/MMBtu)	Emissions (lb/yr)	Source
NO <sub>x</sub>	100 lb/MMcf	0.0980	858.8	AP-42 Sec 1.4 (7/98)
CO	84 lb/MMcf	0.0824	721.4	AP-42 Sec 1.4 (7/98)
VOC	5.5 lb/MMcf	0.0054	47.2	AP-42 Sec 1.4 (7/98)
PM	7.6 lb/MMcf	0.0075	65.3	AP-42 Sec 1.4 (7/98)
SO <sub>2</sub>	0.6 lb/MMcf	0.0006	5.2	AP-42 Sec 1.4 (7/98)
Benzene	0.0021 lb/MMcf	0.000002	0.0	AP-42 Sec 1.4 (7/98)
Formaldehyde	0.075 lb/MMcf	0.0001	0.6	AP-42 Sec 1.4 (7/98)

Actual annual emissions will be calculated based on the AP-42 emission factors shown above and fuel consumption.

- 6.c. Vehicle Preperation Station. Particulate matter emissions from sanding were estimated assuming that five pounds of material will be removed from each vehicle during sanding, and the filtration

system operates properly at 99.3% efficiency. Using these assumptions, 0.035 pounds of PM (assumed to be 100% PM<sub>2.5</sub>) would be emitted per vehicle. Maximum production is estimated at 500 vehicles per year. At this production rate, up to 17.5 pounds per year of particulate matter could be emitted to the ambient air.

6.c Facilitywide Potential Emissions Summary.

<b>Pollutant</b>	<b>Potential Annual Emissions (tpy)</b>
Nitrogen oxides	0.43
Carbon monoxide	0.36
Volatile organic compounds	1.45
Particulate matter	0.07
PM <sub>10</sub>	0.07
PM <sub>2.5</sub>	0.07
Sulfur oxides as sulfur dioxide	0.003
Toxic Air Pollutants	0.90
Hazardous Air Pollutants	0.47

**7. REGULATIONS AND EMISSION STANDARDS**

- 7.a Title 40 Code of Federal Regulations (40 CFR) 51.166(c) "Ambient air increments" requires approved State Implementation Plans to contain emission limitations and other measures as may be necessary to assure that increases in pollutant concentration over the baseline concentration in areas designated as Class I, II, or III shall not exceed the incremental limits contained 40 CFR 51.166(c).
- 7.b 40 CFR 63.11169 et seq. (Subpart HHHHHH) "National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources" establishes standards and work practices for all area sources engaged in paint stripping operations using methylene chloride, autobody refinishing operations, or spray coating of metal or plastic parts with coatings that contain chromium, lead, manganese, nickel, or cadmium (target HAPs). This facility has chosen to not take a prohibition on using the target HAPs and is subject to this regulation unless EPA issues a determination to exempt this facility. SWCAA has not yet taken delegation of this regulation therefore the facility must communicate directly with EPA for compliance demonstration and/or reporting for this rule.
- 7.c Title 40 Code of Federal Regulations Part 70 "State Operating Permit Programs" requires facilities with site emissions of any regulated air pollutant greater than 100 tpy, any single hazardous air pollutant greater than 10 tpy, and/or any aggregate combination of hazardous air pollutants greater than 25 tpy to obtain a Title V permit. The facility is not subject to this regulation.
- 7.d Revised Code of Washington (RCW) 70.94.141 empowers any activated air pollution control authority to prepare and develop a comprehensive plan or plans for the prevention, abatement and control of air pollution within its jurisdiction. An air pollution control authority may issue such orders as may be necessary to effectuate the purposes of the Washington Clean Air Act [RCW 70.94] and enforce the same by all appropriate administrative and judicial proceedings subject to the rights of appeal as provided in Chapter 62, Laws of 1970 ex. sess.
- 7.e RCW 70.94.152 provides for the inclusion of conditions of operation as are reasonably necessary to assure the maintenance of compliance with the applicable ordinances, resolutions, rules and regulations when issuing an Air Discharge Permit for installation and establishment of an air contaminant source.

- 7.f WAC 173-401 "Operating Permit Regulation" requires all major sources and other sources as defined in WAC 173-401-300 to obtain an operating permit. This regulation is not applicable because this source is not a potential major source and does not meet the applicability criteria set forth in WAC 173-401-300.
- 7.g WAC 173-460 "Controls for New Sources of Toxic Air Pollutants" (effective 8/21/98) requires Best Available Control Technology for toxic air pollutants (T-BACT), identification and quantification of emissions of toxic air pollutants and demonstration of protection of human health and safety.
- 7.h WAC 173-470 "Ambient Air Quality Standards for Particulate Matter" establishes ambient air quality standards for total suspended particulate matter and for particulate matter smaller than 10 microns (PM<sub>10</sub>), which may not be exceeded more than one day per year.
- 7.i WAC 173-474 "Ambient Air Quality Standards for Sulfur Oxides" establishes the following ambient air quality standards for sulfur oxides in the ambient air, measured as sulfur dioxide, which shall not exceed:
- (1) Four-tenths part per million (0.4 ppm) by volume average for a one-hour period more than once per one-year period;
  - (2) Twenty-five one-hundredths part per million (0.25 ppm) by volume average for a one-hour period more than twice in a consecutive seven-day period;
  - (3) One-tenth part per million (0.1 ppm) by volume average for a one-day period more than once per one-year period; and
  - (4) Two one-hundredths part per million (0.02 ppm) by volume average for a one-year period.
- 7.j WAC 173-475 "Ambient Air Quality Standards for Carbon Monoxide, Ozone, and Nitrogen Dioxide" establishes ambient air quality standards for carbon monoxide, ozone, and nitrogen dioxide in the ambient air, which shall not be exceeded.
- 7.k SWCAA 400-040 "General Standards for Maximum Emissions" requires all new and existing sources and emission units to meet certain performance standards with respect to Reasonably Available Control Technology (RACT), visible emissions, fallout, fugitive emissions, odors, emissions detrimental to persons or property, sulfur dioxide, concealment and masking, and fugitive dust.
- 7.l SWCAA 400-040(1) "Visible Emissions" requires that no emission of an air contaminant from any emissions unit shall exceed twenty percent opacity for more than three minutes in any one hour at the emission point, or within a reasonable distance of the emission point.
- 7.m SWCAA 400-040(2) "Fallout" requires that no emission of particulate matter from any source shall be deposited beyond the property under direct control of the owner(s) or operator(s) of the source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited.
- 7.n SWCAA 400-040(3) "Fugitive Emissions" requires that reasonable precautions be taken to prevent the fugitive release of air contaminants to the atmosphere.
- 7.o SWCAA 400-040(4) "Odors" requires any source which generates odors that may unreasonably interfere with any other property owner's use and enjoyment of their property to use recognized good practice and procedures to reduce these odors to a reasonable minimum. This source must be managed properly to maintain compliance with this regulation.

- 7.p SWCAA 400-040(6) "Sulfur Dioxide" requires that no person shall emit a gas containing in excess of one thousand ppm of sulfur dioxide on a dry basis, corrected to 7% O<sub>2</sub> or 12% CO<sub>2</sub> as required by the applicable emission standard for combustion sources.
- 7.q SWCAA 400-040(8) "Fugitive Dust Sources" requires that reasonable precautions be taken to prevent fugitive dust from becoming airborne, and minimize emissions.
- 7.r SWCAA 400-050 "Emission Standards for Combustion and Incineration Units" requires that all provisions of SWCAA 400-040 be met and that no person shall cause or permit the emission of particulate matter from any combustion or incineration unit in excess of 0.23 grams per dry cubic meter (0.1 grains per dry standard cubic foot) of exhaust gas at standard conditions.
- 7.s SWCAA 400-060 "Emission Standards for General Process Units" requires that all new and existing general process units not emit particulate matter in excess of 0.1 grains per dry standard cubic foot of exhaust gas.
- 7.t SWCAA 400-110 "New Source Review" requires that an Air Discharge Permit Application be filed with SWCAA, and an Air Discharge Permit be issued by SWCAA, prior to establishment of the new source, emission unit, or modification.
- 7.u SWCAA 400-111 "Requirements for Sources in a Maintenance Plan Area" requires that no approval to construct or alter an air contaminant source shall be granted unless it is evidenced that:
- (1) The equipment or technology is designed and will be installed to operate without causing a violation of the applicable emission standards;
  - (2) Emissions will be minimized to the extent that the new source will not exceed emission levels or other requirements provided in the maintenance plan;
  - (3) Best Available Control Technology will be employed for all air contaminants to be emitted by the proposed equipment;
  - (4) The proposed equipment will not cause any ambient air quality standard to be exceeded; and
  - (5) If the proposed equipment or facility will emit any toxic air pollutant regulated under WAC 173-460, the proposed equipment and control measures will meet all the requirements of that Chapter.
- This facility is located in an attainment area, therefore this regulation does not apply to this facility.
- 7.r SWCAA 493-400 "Motor Vehicle Refinishing" establishes VOC content limits for motor vehicle refinishing coatings sold for use within, or commercially applied within the boundaries of the Vancouver Air Quality Maintenance Area (AQMA). This regulation is not applicable to this permitting action because the applicant's facility is not located within the Vancouver AQMA.

## **8. RACT/BACT/BART/LAER/PSD/CAM DETERMINATIONS**

- 8.a BACT Determination – Spray Coating. The use of complete enclosure (spray booth), with fabric filtration for particulate matter control, high transfer efficiency spray coating equipment ( $\geq$  65% transfer efficiency), and vertical atmospheric dispersion of exhaust streams has been determined to meet the requirements of BACT and T-BACT for this spray coating operation.
- 8.b BACT Determination - Paint Mixing. The proposed use of sealed storage containers, vertical atmospheric dispersion of exhaust streams, and good work practices has been determined to meet the requirements of BACT and T-BACT for paint mixing operations at this facility.

- 8.c BACT Determination – Paint Spray Booth Heater. The use of combustion equipment that fires a low sulfur fuel (propane or natural gas) and limits visible emissions to 0% opacity or less has been determined to meet the requirements of BACT for booth heating at this facility.
- 8.d Prevention of Significant Deterioration (PSD) Applicability Determination. This permitting action will not result in a potential increase in emissions equal to or greater than the PSD thresholds. Therefore, PSD review is not applicable to this action.
- 8.e Compliance Assurance Monitoring (CAM) Applicability Determination. CAM is not applicable to any emission unit at this facility because it is not a major source and is not required to obtain a Part 70 permit.

## 9. AMBIENT IMPACT ANALYSIS

- 9.a TAP Small Quantity Review. No toxic air pollutants will be emitted at a rate exceeding the applicable Small Quantity Emission Rate (SQER) for that pollutant listed in WAC 173-460 (effective 8/21/98), therefore toxic impacts are presumed to be negligible. Emissions of combustion products (nitrogen oxides, carbon monoxide, sulfur oxides, particulate matter, and volatile organic compounds) are all at or below 1.0 tons per year each from the paint spray booth heaters. At these emission rates, no significant adverse ambient air quality impact is anticipated from the new equipment.
- 9.b Installation of the auto body refinishing facility, as proposed in ADP Application CO-864, will not cause the ambient air quality requirements of Title 40 Code of Federal Regulations (CFR) Part 50 "National Primary and Secondary Ambient Air Quality Standards" to be violated.
- 9.c Installation of the auto body refinishing facility, as proposed in ADP Application CO-864, will not cause the requirements of WAC 173-460 "Controls for New Sources of Toxic Air Pollutants," WAC 173-470 "Ambient Air Quality Standards for Particulate Matter," WAC 173-474 "Ambient Air Quality Standards for Sulfur Oxides," and WAC 173-475 "Ambient Air Quality Standards for Carbon Monoxide, Ozone, and Nitrogen Dioxide" to be violated.
- 9.d The auto body refinishing facility, as proposed in ADP Application CO-864, can be operated without causing a violation of emission standards for sources as established under SWCAA General Regulations Sections 400-040 "General Standards for Maximum Emissions," 400-050 "Emission Standards for Combustion and Incineration Units," and 400-060 "Emission Standards for General Process Units."

## 10. DISCUSSION OF APPROVAL CONDITIONS

- 10.a General Basis. Approval conditions for equipment affected by this permitting action incorporate the operating schemes proposed by the permittee in the Air Discharge Permit application.
- 10.b Emission Limits. The annual spray coating emission limits and booth heater emission limits calculated in Section 6 of this document are included in the Permit.
- 10.c Operating Limits and Requirements. Permit requirements for operations are intended to minimize emissions and prevent nuisance conditions. Visible emissions are limited to 0% opacity consistent with proper operation. Exhaust gases must be discharged vertically to provide optimum atmospheric dispersion and may not utilize a rain-cap or other device that interferes with vertical dispersion. A pressure gauge is required for monitoring pressure drop across the Paint Spray Booth filters to indicate when filters require replacement.

Because emissions from the Paint Spray Booth heaters were reviewed only for the scenario where the burners are fired on natural gas, operation of the Paint Spray Booth heater on other, potentially dirtier fuels, is prohibited

10.d Monitoring and Recordkeeping. Sufficient monitoring and recordkeeping was established to document compliance with the VOC and TAP emission limits, and provide for general requirements (e.g. upset reporting, annual emission inventory submission). In addition, the pressure drop across the Paint Spray Booth and Prep Station filters is required to be recorded weekly to ensure that the filters are not plugged.

10.e Reporting. Specific reporting deadlines were established for each reporting requirement. The submittal date refers to the earlier of the date the report is delivered to SWCAA or the postmarked date if sent through the US Post Office.

The permit requires reporting of the annual air emissions inventory, and reporting of the data necessary to develop the emission inventory. Upset conditions with the potential to cause excess emissions must be reported immediately in order to qualify for relief from penalty in accordance with SWCAA 400-107 for unavoidable exceedances. In addition, prompt reporting allows for prompt and accurate investigation into the cause of the event and the prevention of similar future incidents.

## **11. START-UP AND SHUTDOWN/ALTERNATIVE OPERATING SCENARIOS/POLLUTION PREVENTION**

11.a Start-up and Shutdown Provisions. Pursuant to SWCAA 400-081 "Start-up and Shutdown", technology based emission standards and control technology determinations shall take into consideration the physical and operational ability of a source to comply with the applicable standards during start-up or shutdown. Where it is determined that a source is not capable of achieving continuous compliance with an emission standard during start-up or shutdown, SWCAA shall include appropriate emission limitations, operating parameters, or other criteria to regulate performance of the source during start-up or shutdown.

To SWCAA's knowledge, this facility can comply with all applicable standards during startup and shutdown.

11.b Alternate Operating Scenarios. SWCAA conducted a review of alternate operating scenarios applicable to equipment affected by this permitting action. The permittee did not propose or identify any applicable alternate operating scenarios. Therefore, none were included in the permit requirements.

11.c Pollution Prevention Measures. SWCAA conducted a review of possible pollution prevention measures for the facility. No pollution prevention measures were identified by either the permittee or SWCAA separate or in addition to those measures required under BACT considerations. Therefore, none were included in the permit requirements.

## **12. EMISSION MONITORING AND TESTING**

Due to the nature and small quantity of air pollutant emissions from equipment at this facility, emission monitoring and/or testing requirements were not established in the Permit.

### 13. FACILITY HISTORY

- 13.a. General History. This facility was originally a non-registered source under the name Autocraft and Accent Auto. The facility was purchased in 2008 by Jim Stirling Motors, Inc and renamed Stirling Auto Body.
- 13.b. Previous Permitting Actions. This is an initial permitting action.
- 13.c. Compliance History.

Date	FNOV/C	Violation
9/8/2008	4428	Operation of paint booth without permit, open containers, lack of record keeping, late report

### 14. PUBLIC INVOLVEMENT OPPORTUNITY

- 14.a. Public Notice for ADP Application CO-864. Public notice for ADP Application CO-864 was published on the SWCAA internet website for a minimum of fifteen (15) days beginning on November 20, 2008.
- 14.b. Public/Applicant Comment for ADP Application CO-864. SWCAA did not receive specific comments, a comment period request, or any other inquiry from the public or the applicant regarding ADP Application CO-864. Therefore no public comment period was provided for this permitting action.
- 14.c. State Environmental Policy Act. A Determination of Non Significance was made by SWCAA and was included with this Permit.