

**Statement of Basis for
Kenworth Truck Company Renton Facility
AOP Renewal 1
*Administrative Amendment: June 10, 2008***

I. PURPOSE OF THIS STATEMENT OF BASIS

A. General

This document summarizes the legal and factual bases for the draft permit conditions in the Kenworth Truck Company (Renton) (hereafter known as Kenworth Renton) air operating permit to be issued under the authority of the Washington Clean Air Act, Chapter 70.94 Revised Code of Washington, Chapter 173-401 of the Washington Administrative Code and Puget Sound Clean Air Agency (previously known as Puget Sound Air Pollution Control Agency) Regulation I, Article 7. Unlike the permit, this document is not legally enforceable. It includes references to the applicable statutory or regulatory provisions that relate to Kenworth Renton emissions to the atmosphere. In addition, this Statement of Basis provides a description of Kenworth Renton activities and a compliance history.

B. Modification 1

This document also describes the first modification to the Kenworth Renton air operating permit, beginning on page 3.

C. Renewal 1

This document also describes the first renewal to the Kenworth air operating permit (which was originally issued on August 24, 2000 for a five year period), briefly on page 4, and in much greater detail on page 32.

II. SOURCE DESCRIPTION

A. Kenworth Renton– AOP applicable facility

Kenworth Renton operates a truck assembly facility on North 8th Street in Renton, Washington that produces highway and off-highway trucks. Its primary Industrial Classifications are Motor Vehicles and Car Bodies and Small Parts Fabrication. The plant was completed in 1993 and began building trucks in May of 1993.

Historically, Kenworth Renton has emitted significant quantities of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) and, therefore, is subject to the operating permit program. Most of these emissions come from painting new trucks. Kenworth Renton also has accepted VOC and HAP emission caps. While production has greatly increased at the Renton plant, VOC emissions have increased at a commensurately lower rate because Kenworth has

employed low VOC paint applications. The plant has not come close to its VOC cap originally approved in 1993 and increased in 1994 and 1997.

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

Plant utilities use natural gas solely; however, alternate fuels such as liquid natural gas (LNG) and/or propane or other alternate fuels may be used in the future. The plant also includes a wastewater treatment facility, which discharges pretreated wastewater to the sanitary sewer under a King County Industrial Waste Program pre-treatment permit.

Kenworth attributes much of its success as a truck manufacturer to the fact that each truck is custom built to include features desired by the customer. Each truck has its own set of features including model type, engine, transmission, interior, instrumentation, amenities and customized paint.

Coating operations generate the greatest amount of air pollutant emissions from the site and are a function of customer trends toward larger interiors, painting more components, adding a clear coat for paint longevity, color coating the chassis, sound proofing, etc. In addition, changes in production rates, paint chemistry, coating application technologies, fabrication materials and techniques can affect plant emissions in many ways that are currently unforeseeable. The plant must be able to respond rapidly to customer requests in order to stay competitive in the heavy-duty truck market.

Emissions will vary from year-to-year depending on the quantity of trucks and parts coated, and the types and quantities of coatings and solvents used. VOC emissions occur from the storage, handling, mixing, use, application equipment, enhanced drying, and cleanup of VOC-containing coatings and solvents. These emissions are accounted for on a facility-wide basis only. Puget Sound Clean Air Agency Board Resolution No. 848 (adopted April 10, 1997) approved General Regulatory Order No. 6654 as an Alternate Means of Compliance with Puget Sound Clean Air Agency's VOC content limits for vehicles, as provided for in Regulation I, Section 3.23. Kenworth Renton is allowed to use conventional spray equipment provided it does not exceed 3.5 pounds of VOC content per gallon of paint for topcoat and primer when using this equipment (see Section I.B.1 of the permit). This General Regulatory Order was subsequently modified by General Regulatory Order No. 8344 (adopted on July 24, 2003) which allowed Kenworth Renton to not count negligibly reactive compounds as a VOC when computing pounds of VOC per gallon of coating.

Kenworth Renton may use any compliant coatings and solvents as necessary to meet production requirements. However, the facility must still stay within the plant-wide VOC emissions limit of 383 tons/year that was approved on November 21, 1997.

B. Adjacent PACCAR facilities – relative to the Kenworth Renton AOP

The PACCAR Renton Campus has five facilities situated on it. The first four are separate and independent entities, and are not included in the Kenworth Renton air operating permit. The Active Transport operation, formerly called Dallas & Mavis, is related to the truck production in that they are the delivery contractor for completed trucks. However, there are no regulated emission generating activities on this site as a result of the work and presence of Active Transport:

1. Kenworth Renton (KW Renton),
2. Kenworth Research and Development (KW R&D),
3. PACCAR Parts Warehouse and Division Offices (PPD),
4. Information Technology Division (ITD), and
5. Active Transport truck delivery contractor.

Kenworth Renton is a major source because it has the potential to emit VOC pollutants greater than major source threshold levels. Even though they are located within the same overall plant boundary, the other facilities are not part of the Kenworth Renton facility because they are not under common control, or they do not have the same two digit SIC code as Kenworth Renton. The other facilities are not major sources, based on their potential to emit, so they are not required to obtain individual air operating permits.

The rationale for this determination was provided by Kenworth Renton, and is copied verbatim on page 30 of this document.

III. PERMIT HISTORY

A. Original Permit

1. Issuance of Original Permit

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

Puget Sound Clean Air Agency issued the Kenworth Renton Air Operating Permit on August 24, 2000.

2. Minor Modification 1

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

On July 8, 2002 Kenworth also requested a change to the name of the responsible official, to reflect the fact that Mr. Douglas J. Baugh is the current Plant Manager at the Kenworth-Renton plant.

The Puget Sound Clean Air Agency reviewed these requests and took the following actions:

- The Puget Sound Clean Air Agency issued General Regulatory Order No. 8344 to allow use of acetone and other negligibly reactive compounds as substitutes for HAP- and VOC-classified solvents in topcoats, primers, gun wash thinner, and other products on July 24, 2003. General Regulatory Order No. 8344 superseded and cancelled General Regulatory Order No. 6654, dated April 10, 1997.
- The Puget Sound Clean Air Agency issued Notice of Construction Order of Approval No. 6074 Modification 1 to allow use of acetone and other negligibly reactive compounds as substitutes for Hazardous Air Pollutant (HAP)- and Volatile Organic Compound (VOC)-classified solvents in topcoats, primers, gun wash thinner, and other products on August 8, 2003. This modification superseded Orders of Approval No. 6074, dated August 16, 1995 and No. 6977 dated October 21, 1997.

Unfortunately, these changes could not be done “off-permit” as existing requirements in the AOP (the original NOC Conditions) specifically required that acetone be counted as a VOC. The Puget Sound Clean Air Agency subsequently determined that the Kenworth Renton AOP would have to undergo a Minor Permit Modification. Therefore, the permit was opened and the appropriate changes were made.

B. Renewal 1

On August 24, 2004 Kenworth submitted a Title V renewal application for the Kenworth Renton facility. The application consisted of a cover letter and “marked up” copies of the existing AOP and SOB. Critical items required under WAC 173-401-710, such as a compliance plan and certification by the responsible official, were included. On September 2, 2004 the Puget Sound Clean Air Agency sent a letter to Kenworth indicating that the renewal application had been found to be complete. No substantive changes to the permit were requested by Kenworth or made by the Puget Sound Clean Air Agency, but numerous small items were changed, and those changes are described in detail beginning on page 32. On March 20, 2006 Kenworth requested that the name of the responsible official be changed. This change was incorporated into the draft AOP renewal on March 27, 2006 rather than as an Administrative change to the current AOP.

IV. COMPLIANCE HISTORY

A. Compliance and Inspection history prior to issuance of the original AOP

The Kenworth Renton facility has been inspected at least annually by the Puget Sound Clean Air Agency since 1993. Kenworth Renton has received four Compliance Status Reports (CSRs) from the Puget Sound Clean Air Agency between the time the plant was constructed and the date of issue of the original AOP; one for failing to use HVLP equipment when spraying VOC material, and three for open VOC containers or uncovered solvent rag storage. On the first issue,

Kenworth had previously received approval from the Puget Sound Clean Air Agency to use conventional spray equipment at Kenworth's Tukwila plant. Kenworth had interpreted that the approval for Tukwila applied to Renton as well. The Puget Sound Clean Air Agency eventually approved the use of conventional spray equipment at this site via General Regulatory Order No. 6654.

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

On an August 27, 1997 inspection by the Puget Sound Clean Air Agency at this site, the US Environmental Protection Agency (EPA) provided oversight. During that inspection, neither Agency noted compliance issues.

B. Compliance and Inspection history since issuance of the original AOP

During the past five years, the Puget Sound Clean Air Agency conducted ten compliance inspections of Kenworth in Renton, WA. Inspection dates were: March 24, 2005; November 9, 2003; June 25, 2003; April 1, 2002; May 21, 2001; and September 5, 2000.

The Puget Sound Clean Air Agency has taken the following enforcement actions against Kenworth during the last five years:

Violation Date	NOV/WW #	Issue Date	Closure Date	Reg/AOP Citation	AOP # 17796 issued 8/24/00 Reference
09/01/00	Written Warning No. 2-000454	04/26/01	04/26/01	Reg II: 3.04(c)/Sect B7.2	VOC-contaminated rag found by Agency inspector. Corrective action taken. Training and internal audits enhanced.
09/01/00	Notice of Violation 3-001851	04/26/01	08/09/01 AOD	Reg II: 3.04(e)/EU-7.4	Adhesive coating was found to exceed the VOC limit for specialty coatings. Conventional, rather than HVLP gun was used for coatings with > 3.5 lb/gal VOC. Training and internal audits enhanced.
05/21/01	Written Warning No. 2-006558	05/21/01	07/30/01	Reg I: 9.20, Reg II: 3.04(g)	Agency inspector found VOC-laden rags not stored in closed containers, gaps in filters of paint booth, manometer out-of-range on another paint booth, and two manometers without operating range markings. Training and internal audits enhanced.
10/09/03	Written Warning No. 2-001675	10/09/03	11/17/03	Reg I: 9.20, Reg II: 3.04(g)/II.A.1 (a), IV Q I	Visible emissions observed from welding booth exhaust stack. Control device was installed.

There are no outstanding compliance issues for this facility.

V. EMISSION INVENTORY

Emissions at this facility come principally from coating operations and to a minor extent from assembly and maintenance operations. Emission levels depend upon the number of trucks the plant is producing at any given time. The plant recently has been operating for approximately 4,160 hrs/yr. Kenworth Renton has indicated a potential need to operate as many as 6,280 hrs/yr in the immediate future, depending on truck demand. The table below shows emissions for the previous four years from surface coating operations (VOCs and HAPs) and fuel combustion.

The emissions of common pollutants are listed below:

Pollutants	Tons per year			
	2000	2001	2002	2003
Carbon Monoxide (CO)	1	<1	<1	<1
Nitrogen Oxides (NO ₂)	6	3	3	4
Particulate Matter (PM)	<0.5	<0.5	<0.5	<0.5
Sulfur Dioxide (SO ₂)	<0.5	<0.5	<0.5	<0.5
Volatile Organic Compounds (VOC)	96	34	50	47
Hazardous Air Pollutants (HAP)	24	2	3	3

VI. EXPLANATION OF APPLICABLE REQUIREMENTS

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

A. Applicable Requirements

Kenworth is subject to all the requirements listed in Section I of the operating permit. Section I.A contains the requirements that are applicable facility-wide, and Section I.B contains requirements applicable only to specific emission units. The requirements in Section I.B only apply to the specific emission units cited; however, the requirements in Section I.A also apply to the specific emission units or activities described in Section I.B. If the monitoring, maintenance, and recordkeeping method for any requirement in Section I.A is more extensive for specific emission units, that requirement is repeated in Section I.B with the additional monitoring, maintenance and recordkeeping requirements.

The tables in Section I of the AOP list the citation for each “applicable requirement” in the second column. This can be a Puget Sound Clean Air Agency requirement, a Washington State Department of Ecology requirement, or a federal requirement. All requirements are federally enforceable unless they are identified in column two by the words “STATE ONLY.”

The third column (Date) contains the adoption or effective date of the requirement. In some cases, the effective dates of the Federally Enforceable Requirement and the State Only Requirement are different because either the state has not submitted the regulation to the EPA for approval into the State Implementation Plan (SIP) or the EPA has not approved it. “*STATE ONLY*” adoption dates are in *italicized* font. When the EPA does approve the new requirement into the SIP, the old requirement will be replaced and superceded by the new requirement. This replacement will take place automatically, with no changes being made to the permit until the permit is reissued. The new requirement will be enforceable by the EPA as well as the Puget Sound Clean Air Agency from the date that it is adopted into the SIP, and the old requirement will no longer be an applicable requirement.

The first column is used as an identifier for the requirement, and the fourth (Requirement Paraphrase) column paraphrases the requirement. The first and fourth columns are for information only and are not enforceable conditions of this permit. The actual enforceable requirement is embodied in the requirement cited in the second and third columns.

The fifth column (Monitoring, Maintenance & Recordkeeping Method) identifies the methods described in Section II of the permit. Following these methods is required to “reasonably assure continuous compliance” with, and is an enforceable requirement of, this air operating permit. Note that all inspections, tests, and other actions must be documented.

The sixth (Emission Standard Period) column identifies the averaging time for the reference test method. The last column (Reference Test Method) identifies the reference method associated with an applicable emission limit that is to be used if and when a source test is required. In some cases where the applicable requirement does not cite a test method, one has been added.

In the event of conflict or omission between the information contained in the fourth and sixth columns 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 and third columns, refer to the actual requirements cited.

1. Section I.A Facility-Wide Applicable Requirements

The requirements in Section I.A. of the air operating permit apply facility-wide to all the emission units except that monitoring methods specified elsewhere in the permit for specific applicable requirements for specific emission units or activities supersede the general monitoring requirements listed in Section I.A.

(a) Opacity Requirements

Both WAC 173-400-040(1) and Puget Sound Clean Air Agency Regulation I, Section 9.03 standards are 20% opacity and apply to all stationary sources. There are two versions of 173-400-040(1) and Regulation I, Section 9.03: the federally enforceable, SIP-approved version and the “*STATE ONLY*,” non-SIP-approved version.

The monitoring method is based on quarterly visual inspections of all emission points at Kenworth Renton, with the source taking corrective action or using the reference test method, WDOE Method 9A, to determine opacity if any visible emissions are noted. The Puget Sound Clean Air Agency has determined that the monitoring should be quarterly for the reasons listed

below. These factors are consistent with EPA's April 30, 1999 Draft *Periodic Monitoring Technical Reference Document*.

Initial compliance. The Puget Sound Clean Air Agency has not observed visible emissions from these activities during any inspection. During the implementation period for robotic painting, Kenworth Renton did observe on a few occasions what looked to be very low opacity from the stacks evacuating the robotic paint booths. During those periods Method 9 tests were performed and concluded there was no opacity. Therefore, we conclude that Kenworth Renton is generally in compliance with the opacity requirements.

Margin of compliance. The monitoring method is designed so that the source will take corrective action before a violation occurs. The emission units are unlikely to generate visible emissions except under the most unusual circumstances. In addition, the Puget Sound Clean Air Agency has inspected this facility at least annually since 1993 and has not identified opacity issues; therefore, the Puget Sound Clean Air Agency has determined that quarterly monitoring is adequate except as provided for under specific emission unit monitoring requirements. Recording of visible emissions is not necessarily a deviation of the opacity requirements. However, failure to take timely corrective action, as defined by the monitoring method, is a deviation of the specific permit term. Taking corrective action does not relieve Kenworth Renton from the obligation to comply with the opacity requirement itself.

Variability of process and emissions. Emissions from the facility are generally proportionate to production rates. Production rates are relatively constant on a per-shift basis or hourly basis, so emissions are relatively constant for each hour of facility operation. Surface preparation areas, including overspray from sanding and touch-up painting, generate fine particulate emissions in the form of fiberglass dust as the truck body parts are sanded. All such activities are done in enclosed areas that are vented to high-efficiency filters maintained in accordance with the O&M Plan. While these particulate emissions are minimal after filtration, they are the most likely sources of visible emissions. The most significant variable affecting emissions would be the degree to which Kenworth Renton follows its O&M Plan.

Environmental impacts of problems. Observed opacity is generally related to emissions of particulate matter. All the stacks at Kenworth Renton combined normally emit less than a ton of particulate per year. A maintenance problem is unlikely to result in emissions that would have a significant environmental impact.

Technical considerations. Catastrophic failure of a dust collector, spray booth filtration system or significant malfunction of a natural gas-fired drying oven or heating unit are the only likely causes of an opacity standard deviation at Kenworth Renton. Kenworth Renton is required to inspect all paint filtration systems once each operating day and dust collectors once per quarter, thereby minimizing the chance of a catastrophic filtration system failure. Makeup air heaters (MAUs), air supply houses (ASHs) and drying ovens at Kenworth Renton can only be fired on natural gas, and in accordance with an acceptable O&M Plan, thereby minimizing the probability of an opacity standard violation.

(b) Particulate Standards

Puget Sound Clean Air Agency Regulation I, Section 9.09 limits particulate emissions to 0.05 grain per dry standard cubic foot of stack gas (gr/dscf) from equipment used in a manufacturing process. Section 9.09 has several other particulate matter emissions limits for refuse and fuel burning equipment, but they do not apply in the case of equipment used in a manufacturing process. The Puget Sound Clean Air Agency has determined that the monitoring should be quarterly for the reasons listed below. These factors are consistent with EPA's April 30, 1999 Draft *Periodic Monitoring Technical Reference Document*.

Initial compliance. The Puget Sound Clean Air Agency has not observed visible emissions from these activities during any inspection. During the implementation period for robotic painting, Kenworth Renton did observe on a few occasions what looked to be very low opacity from the stacks evacuating the robotic paint booths. During those periods Method 9 tests were performed and concluded there was no opacity. Therefore, we conclude that Kenworth Renton complies with the particulate matter requirements.

Margin of compliance. The emission units are unlikely to generate particulate emissions except under the most unusual circumstances. The monitoring method is designed so that the source will take corrective action before a violation occurs. In addition, the Puget Sound Clean Air Agency has inspected this facility at least annually since 1993 and has not identified particulate matter issues; therefore, the Puget Sound Clean Air Agency has determined that quarterly monitoring is adequate. Recording of visible emissions is not necessarily a deviation of the particulate requirements. However, failure to take timely corrective action, as defined by the monitoring method, is a deviation of the specific permit term. Taking corrective action does not relieve Kenworth Renton from the obligation to comply with the particulate requirement itself.

Variability of process and emissions. Emissions from the facility are generally proportionate to production rates. Production rates are relatively constant on a per-shift basis or hourly basis, so emissions are relatively constant for each hour of facility operation. Surface preparation areas, including overspray from sanding and touch-up painting, generate fine particulate emissions in the form of fiberglass dust as the truck body parts are sanded. All such activities are done in enclosed areas that are vented to high-efficiency filters, maintained in accordance with the O&M Plan. The most significant variable affecting emissions would be the degree to which Kenworth Renton follows its O&M Plan.

Environmental impacts of problems. Observed opacity is generally related to emissions of particulate matter. All the stacks at Kenworth Renton combined normally emit less than a ton of particulate per year. A maintenance problem is unlikely to result in emissions that would have a significant environmental impact.

Technical considerations. Catastrophic failure of a dust collector, spray booth filtration system or significant malfunction of a natural gas-fired drying oven or heating unit are the only likely causes of a particulate matter standard deviation at Kenworth Renton. Kenworth Renton is required to inspect all paint filtration systems once each operating day and dust collectors once per quarter, thereby minimizing the chance of a catastrophic filtration system failure. Makeup air heaters (MAUs), air supply houses (ASHs), space heaters and drying ovens at Kenworth

Renton can only be fired on natural gas, and in accordance with an acceptable O&M Plan, thereby minimizing the probability of a particulate matter standard violation.

This subsection applies to the dust collectors (baghouses) for which monitoring is specified in Section II.A.2(g) of the AOP, as well as the spray booth filtration systems. Despite the above rationale that substantiates quarterly inspection intervals, the dust collector monitoring procedure in Section II.A.2(g) of the AOP erroneously called for monthly inspections. The inspection interval for the dust collectors has been corrected to a quarterly interval in Section II.A.2(g) of the AOP, and additional wording has been inserted that specifies what needs to be done and how soon it needs to be done in the event of a problem with the dust collectors.

(c) Particulate Matter Requirements (Combustion Sources)

Puget Sound Clean Air Agency Regulation I, Section 9.09 limits particulate emissions to 0.05 gr/dscf corrected to 7% oxygen from equipment that burns fuel other than wood. All the fuel burning equipment emission units at Kenworth Renton burn natural gas, and could burn propane, butane or liquid natural gas. These fuels have very low particulate emission factors. Monitoring for emissions from three applicable units over 10 MMBtu/hr heat input is addressed in EU 9. The rest are insignificant emission units and do not require particulate monitoring. Two internal combustion units (i.e., engines powering stationary equipment) are not defined as fuel burning equipment. Kenworth Renton shall monitor for visible emissions per the facility-wide monitoring method. WAC 173-400-050(1) limits particulate emissions to 0.1 gr/dscf corrected to 7% O₂ from all combustion units, including both internal and external combustion units. While the Puget Sound Clean Air Agency requirement only allows one-half the particulate matter concentration allowed by Ecology, both requirements require the measured particulate matter concentration to be corrected to 7% oxygen. These requirements apply to equipment that produces hot air, hot water, steam, or other heated fluids by external combustion of fuel, or all of Kenworth Renton's combustion units -- items such as indirect-fired drying ovens and space heaters and water heaters. Since Kenworth Renton burns only pipeline grade natural gas, it is incapable of violating this standard while complying with the other requirements in the permit. Therefore, the permit does not contain additional monitoring requirements other than facility-wide monitoring.

The State Implementation Plan (SIP) identifies the effective date of WAC 173-400-050 as August 20, 1993; however, the versions that were in effect on August 20, 1993 became effective on March 22, 1991.

(d) Sulfur Dioxide Requirements

Both Puget Sound Clean Air Agency Regulation I, Section 9.07 and WAC 173-400-040(6) are equivalent requirements (SO₂ emissions not to exceed 1000 ppmv), except for the second paragraph of the WAC, which is not in the Puget Sound Clean Air Agency regulation. That paragraph, which is not federally enforceable, allows for exceptions to this requirement if the source can demonstrate that there is no feasible method of reducing the SO₂ concentrations to 1000 ppm. Since the Puget Sound Clean Air Agency rules do not allow the exception, the second paragraph does not apply to Kenworth Renton. In the combustion units, Kenworth

Renton can only burn pipeline quality natural gas. “Natural gas” means a mixture of gaseous hydrocarbons, with at least 80 percent methane (by volume), and of pipeline quality, such as the gas sold or distributed by any utility company regulated by the Washington Utilities and Transportation Commission. Natural gas may also be referred to as “pipeline quality natural gas.” Kenworth Renton receives the same natural gas as all of the other natural gas consumers, private and industrial, in the Northwest. According to Section 1.4-3 of AP-42, natural gas contains approximately 2000 grains of sulfur per million cubic feet, which is equivalent to approximately 3.4 parts of sulfur per million cubic feet of natural gas, as shown in the following calculation:

$$\frac{2,000 \text{ gr } S}{1,000,000 \text{ ft}^3 \text{ nat. gas}} \times \frac{1 \text{ lb}}{7000 \text{ gr}} \times \frac{385 \frac{\text{ft}^3}{\text{mole } S}}{32 \frac{\text{lb}}{\text{mole } S}} = 3.44 \times 10^{-6} \frac{\text{ft}^3 S}{\text{ft}^3 \text{ nat. gas}} \equiv 3.44 \text{ ppmdv } S$$

According to *Perry’s Chemical Engineer’s Handbook*, each cubic foot of natural gas requires approximately 10 cubic feet of air for combustion, yielding approximately 11 cubic feet of combustion exhaust gases, consisting mostly of nitrogen, water vapor, and carbon dioxide. The sulfur in the natural gas will almost all be converted to sulfur dioxide, with each cubic foot of sulfur producing the same volume of sulfur dioxide. Since each cubic foot of natural gas contains 4.08×10^{-5} cubic foot of sulfur, each cubic foot of stack exhaust will contain approximately:

$$3.44 \times 10^{-6} \frac{\text{ft}^3 S}{\text{ft}^3 \text{ nat. gas}} \times \frac{1 \text{ ft}^3 \text{ SO}_2}{1 \text{ ft}^3 S} \times \frac{1 \text{ ft}^3 \text{ nat. gas}}{11 \text{ ft}^3 \text{ stack exhaust}} = 3.13 \times 10^{-7} \frac{\text{ft}^3 \text{ SO}_2}{\text{ft}^3 \text{ stack exhaust}}$$

This is equivalent to 0.31 ppmv SO₂. Note that this estimated value is less than one-tenth of one percent of the 1,000 ppm SO₂ standard. Therefore, it is reasonable to assume that combustion units that are fired on natural gas cannot exceed the 1,000 ppm SO₂ limits in Puget Sound Clean Air Agency Regulation I, Section 9.07 and WAC 173-400-040(6). The other emission units are not capable of generating SO₂ emissions as permitted. Therefore, the permit does not contain additional monitoring requirements. The Fuel Combustion Monitoring Plan in Section II of the AOP allows Kenworth to burn natural gas, propane, butane, or liquid natural gas. All of these fuels have similarly low SO₂ contents.

(e) Hydrogen Chloride Requirements

Puget Sound Clean Air Agency Regulation I, Section 9.10 specifies that HCl emissions shall not exceed 100 ppm (dry) corrected to 7% O₂ for combustion sources, including both internal and external combustion units. Since Kenworth Renton burns only pipeline-grade natural gas and the solvents used in the truck coatings and cleaning solvents contain no chlorine, the facility is incapable of violating the standard while complying with the other requirements in the permit. Therefore, the permit does not contain additional monitoring requirements.

(f) "Nuisance" Requirements

Puget Sound Clean Air Agency Regulation I, Sections 9.11(a) and 9.15(d) and WAC 173-400-040(5) are similar requirements that address emissions that may be environmentally detrimental or cause a nuisance. Section 9.11(a) has both a federally enforceable SIP-approved and non-SIP approved version that are identical. Although the permit lists these requirements together, Kenworth Renton must comply with each. The monitoring method for both is based on responding to complaints and general inspections of the facility to identify any emissions that are likely to be injurious to human health, plant or animal life, or property, or that unreasonably interfere with enjoyment of life and property. For dust collectors, Kenworth Renton shall check for visible emissions, fallout and fugitive dust. Receiving complaints does not necessarily mean Kenworth Renton is in violation of this requirement, but Kenworth Renton has a responsibility to investigate complaints and take corrective action if necessary. Puget Sound Clean Air Agency has not noted nor has Puget Sound Clean Air Agency received complaints about Kenworth Renton causing emissions that are likely to be injurious to health, plant or animal life, or property or that unreasonably interferes with enjoyment of life and property. Kenworth Renton does not handle or process material that is likely to cause fugitive dust emissions.

The buildings at Kenworth Renton are totally enclosed and all the roadways and parking lots are paved including a newly-paved (2003) lot that is used for storage of plant equipment and truck trailers. The Puget Sound Clean Air Agency has never noted any fugitive dust emissions from the plant grounds. The Puget Sound Clean Air Agency has not received a complaint on the facility since 1996. Therefore, the Puget Sound Clean Air Agency has determined that the quarterly facility-wide inspections required in Section II.A.1(c) of the permit are sufficient to monitor for changes that would cause a fugitive emission or unexpected buildup of dust on the roadways and parking lots.

Puget Sound Clean Air Agency Regulation I, Section 9.11(a) (non-federally enforceable) and the WAC 173-400-040(4) address odors. The monitoring method is based on responding to complaints, quarterly inspections of the facility to identify emissions of odor-bearing contaminants and correcting any problems identified as a result of the inspection or investigation. Receiving complaints does not necessarily mean Kenworth Renton is in violation of this requirement, since the regulation does not prohibit the emission of odors, but prohibits the emissions of odors if good practices are not employed to control emissions. The most likely source of odor is the solvent emission from the painting operations. Complaints will trigger action by Kenworth Renton to investigate and correct problems that could result in a violation.

(g) Fugitive Dust Requirements

WAC 173-400-040(2) prohibits the emission of particulate matter from the facility to be deposited beyond the property line in sufficient quantity as to unreasonably interfere with the use and enjoyment of the property upon which the material is deposited. The monitoring method is based on responding to complaints and general inspections of the facility to identify any particulate emissions or deposition of particulate that may unreasonably interfere with the use and enjoyment of the property and correcting any problems identified as a result of the inspection or investigation. Receiving complaints does not necessarily mean Kenworth Renton

is in violation of this requirement, but triggers action by the source to prevent a violation.

WAC 173-400-040(3) addresses fugitive dust emissions for some activities, and WAC 173-400-040(8) requires reasonable precautions or reasonably available control technology (RACT) to control fugitive emissions. Recording of fugitive dust emissions is not necessarily a violation of the requirement, since the requirement does not prohibit fugitive dust emissions, but prohibits fugitive dust unless BACT is employed. BACT is employed for all sources of dust at this plant via dry filters or water washed systems on the spray equipment, and dust collectors on grinding, sanding, and welding equipment. Since equipment is controlled or vented directly through a stack, Kenworth Renton is incapable of violating this standard while complying with the other requirements in the permit. Therefore, the monitoring method specifies a quarterly inspection of the facility to monitor for fugitive emissions. The monitoring method is based on visual inspections with the source taking corrective action within 24 hours if any fugitive dust emissions are noted. The monitoring method is consistent with Puget Sound Clean Air Agency's "Agency Policy on Fugitive Dust Controls, March 1995," which specifies reasonable precautions that must be taken to prevent fugitive dust emissions.

The Puget Sound Clean Air Agency has determined that the monitoring should be quarterly for the reasons listed below. These factors are consistent with EPA's April 30, 1999 Draft *Periodic Monitoring Technical Reference Document*.

- 1) Initial compliance. The Puget Sound Clean Air Agency has not observed visible emissions from track-out or spillage during any inspection, nor has Kenworth Renton; therefore, we conclude that Kenworth Renton complies with the track-out requirements.
- 2) Margin of compliance. The monitoring method is designed so that the source will take corrective action before a violation occurs. Vehicles leaving the plant are unlikely to generate track-out or spillage except under the most unusual circumstances. In addition, the Puget Sound Clean Air Agency has inspected this facility at least annually since 1993 and has not cited Kenworth Renton for violating Section 9.15, nor has it identified track-out of mud or dirt or spillage. Therefore, the Puget Sound Clean Air Agency has determined that quarterly monitoring is adequate. Recording of track-out of mud, dirt or spillage is not necessarily a deviation of the requirements. However, failure to take timely corrective action, as defined by the monitoring method, is a deviation of the specific permit term. Taking corrective action does not relieve Kenworth Renton from the obligation to comply with the track-out or spillage requirement itself.
- 3) Variability of potential fugitive emissions. This facility has some heavy truck traffic, mostly new trucks leaving the facility, and is not the type of activity that would normally generate track-out. Vehicle traffic out of the facility is generally proportionate to production rates. Potential fugitive emissions are almost nonexistent, but truck traffic would be proportional to production rates that are relatively constant on a per-shift basis or hourly basis, so traffic is relatively constant for each hour of facility operation. Trucks do not carry or spill dirt, and all roads are paved and maintained in accordance with the O&M Plan. The most significant variable affecting deposition of dirt or mud on or near plant grounds -- coming or going -- would be associated with any construction, demolition or delivery activity that may occur.

4) Environmental impacts of problems. The most likely potential for violating this provision is associated with any temporary construction or demolition activity that may occur. Observed track-out of mud or spillage of dirt is generally related to trucks crossing adjacent unpaved areas, offsite, and dump trucks that leave the plant with partial or uncovered dirt loads or related material during times of construction or demolition. All the trucks that leave Kenworth Renton with dirt or dirty material are covered. Noncompliant trucks are unlikely to result in emissions that would have a significant environmental impact.

5) Technical considerations. In general, there are no likely causes of track-out and spillage of mud and dirt at Kenworth Renton. The monitoring method requires quarterly inspections of the facility, investigating any complaints and taking corrective action within 24 hours if spillage, track-out or fugitive dust is observed. This minimizes the chance of generalized problems and the probability of a track-out or spillage violation.

The federally approved Puget Sound Clean Air Agency Regulation I, Section 9.15(c) prohibits fugitive dust emissions from any refuse burning equipment, fuel burning equipment, equipment used in a manufacturing process, or control equipment. Fugitive dust emissions are emissions of smoke, dust or fumes that are not collected by a capture system and emitted from a stack. Kenworth Renton does not have any refuse burning equipment (i.e., equipment employed to burn any solid or liquid combustible refuse), and all other equipment subject to this requirement is now either controlled or vented directly through a stack. Therefore, it is very unlikely that Kenworth Renton would cause a violation of this standard while complying with the other requirements in the permit. The monitoring method requires Kenworth Renton to conduct quarterly facility-wide inspections to look for fugitive emissions and to respond to any complaints concerning fugitive emissions.

(h) Operation and Maintenance Requirements

Puget Sound Clean Air Agency Regulation I, Section 9.20 requires Kenworth Renton to maintain equipment in good working order. Section 9.20(a) applies to sources that received a Notice of Construction Order of Approval under Puget Sound Clean Air Agency Regulation I, Article 6. Section 9.20(b) applies to equipment not subject to Section 9.20(a). Section II.A Monitoring, Maintenance and Recordkeeping Procedures of the permit identify the minimum monitoring criteria for maintaining equipment in good working order. The section identifies both facility-wide criteria and specific criteria for the emission units and activities. In addition, the facility-wide inspections provide monitoring of the general effectiveness of Kenworth Renton's Operation and Maintenance (O&M) Plan. The Puget Sound Clean Air Agency chose to list all of Section II.A as the monitoring method because many parts of Section II.A apply to several emission units and activities. Where there are specific monitoring requirements for specific emission units, the Puget Sound Clean Air Agency has listed them in Section II.A.2. The Puget Sound Clean Air Agency has determined that following the requirements of Section II of the permit provides sufficient monitoring criteria to certify that the equipment has been maintained in good working order. However, the Puget Sound Clean Air Agency reserves the right to evaluate the maintenance of each piece of equipment to determine if it has been maintained in good working order.

In accordance with federally enforceable Puget Sound Clean Air Agency Regulation I, Section 7.09(b), Kenworth Renton is required to develop and implement an O&M Plan to assure continuous compliance with Puget Sound Clean Air Agency Regulations I, II and III. The requirement specifies that the plan shall reflect good industrial practice, but does not define how to determine good industrial practice. To clarify the requirement, the Puget Sound Clean Air Agency added that in most instances following the manufacturer's operations manual or equipment operational schedule, minimizing emissions until the repairs can be completed and taking measures to prevent recurrence of the problem may be considered good industrial practice. This language is consistent with a Washington Department of Ecology requirement in WAC 173-400-101(4). The Puget Sound Clean Air Agency also added language establishing criteria for determining if good industrial practice is being used. These may include, but are not limited to, monitoring results, opacity observations, review of operations and maintenance procedures, and inspections of the emission units or equipment. The Puget Sound Clean Air Agency added this wording in response to a Washington State court decision, Longview Fibre Co. v. DOE, 89 Wn. App. 627 (1998), which held that similar wording was not vague and gave sufficient notice of the prohibited conduct.

Puget Sound Clean Air Agency Regulation I, Section 7.09(b) also requires Kenworth Renton to promptly correct any defective equipment. However, the underlying requirement in most instances does not define "promptly"; hence for significant emission units and applicable requirements that Kenworth Renton has a reasonable possibility of violating or when a violation would cause an air quality problem, the Puget Sound Clean Air Agency clarified that "promptly" usually means within 24 hours. For many insignificant emission units and equipment not listed in the permit, the meaning of "promptly" will vary because the emission sources and suitable pollution control techniques vary widely, depending on the contaminant sources and the pollution control technology employed. However, the permit identifies a means by which to identify if Kenworth Renton is following good industrial practice.

As described in Section V.Q, Kenworth Renton must report to the Puget Sound Clean Air Agency any instances where it failed to promptly repair any defective equipment. In addition, Kenworth Renton has the right to claim certain problems were a result of an emergency (Section V.R) or unavoidable (Section V.S).

Following these requirements demonstrates that Kenworth Renton has properly implemented the O&M Plan, but it does not prohibit the Puget Sound Clean Air Agency or EPA from taking any necessary enforcement action to address violations of the underlying applicable requirements after proper investigation.

RCW 70.94.040 is similar to Puget Sound Clean Air Agency Regulation I, Section 9.11(a) and is not a federally enforceable requirement.

RCW 70.94.152(7) is similar to Puget Sound Clean Air Agency Regulation I, Section 9.20 and applies facility-wide because Order of Approval No. 6074 applies facility-wide to all approved equipment items. Equipment must be maintained in good working order and adhere to O&M Plan requirements.

(i) Plantwide VOC Emission Cap

Puget Sound Clean Air Agency Order of Approval No. 6074 (issued on August 8, 2003), Condition No. 3 imposes a VOC emission cap of 383 ton/yr. Condition No. 3 also requires Kenworth Renton to record and keep on file a 12-month running total of coatings and thinner usage and resultant emissions. Condition No. 3 also requires Kenworth Renton to report VOC emissions for the previous 12-months to the Puget Sound Clean Air Agency if the total ever exceeds 345 tons per year. Order of Approval No. 6074 was amended on August 8, 2003 to allow Kenworth Renton to utilize the definition of VOC in accordance with EPA requirements, when calculating VOC content of coatings, supersedes and cancels Orders of Approval No. 6074 dated August 16, 1995 and No. 6977 dated October 21, 1997.

Puget Sound Clean Air Agency Order of Approval No. 6074, Condition No. 1 requires that the approved equipment be established according to plans and specifications on file with Puget Sound Clean Air Agency.

2. Section I.B Emission Unit-Specific Requirements

(a) EU-1 Assembly Operations: Highway And Off-Highway Trucks

- Puget Sound Clean Air Agency Regulation II, Section 3.04(a) requires that parts or components of vehicles (cars and trucks) be coated with compliant coatings. The applicable compliant coatings are identified in the regulation. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(a) upon its adoption into the SIP.
- Puget Sound Clean Air Agency Regulation II, Section 3.04(b) requires that mobile equipment where color match is not required (i.e., forklifts and golf carts) be coated with compliant coatings. Kenworth Renton uses hand-held aerosol cans, brush and roller paint application for this purpose. However, Kenworth Renton wants to reserve the right to spray coat mobile equipment with a new color as part of its maintenance operations; therefore, this section of the regulation is included here. This requirement will be deleted upon the adoption of the 7/24/03 version of Reg. II: 3.04 into the SIP.
- Puget Sound Clean Air Agency Regulation II, Section 3.04(e) and General Regulatory Order No. 8344 apply when the source employs HVLP or airless guns to apply an air-dried rubberized material to truck chassis. The material is low in VOC content (<3.5lbs/gal). Regulation II, Section 3.04(e) will be superseded by the 7/24/03 version of Reg. II: 3.04(d) upon its adoption into the SIP.
- When Kenworth Renton performs VOC equipment clean-up, it must collect all clean-up solvent in closed containers per Puget Sound Clean Air Agency Regulation II, Section 3.04(f). This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(e) upon its adoption into the SIP.
- Pursuant to Puget Sound Clean Air Agency Regulation II, Section 3.04(g), any VOC-containing materials such as clean-up rags shall be disposed of or stored in closed containers. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(f) upon its adoption into the SIP.

- Pursuant to Puget Sound Clean Air Agency Regulation II, Section 3.04(c), (effective date is 7/24/03 and is not yet adopted into the SIP), the maximum VOC content of each coating regulated shall be stated on container, handout or elsewhere to permit compliance check.

(b) EU-2 Materials Work

- This emission unit includes exempt low-VOC parts cleaners. As per Puget Sound Clean Air Agency Regulation II, Section 3.04(f), Kenworth Renton must collect all solvent from clean-up equipment in closed containers. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(e) upon its adoption into the SIP.
- Puget Sound Clean Air Agency Regulation II, Section 3.04(g) requires that any VOC-containing materials such as clean-up rags be disposed of or stored in closed containers. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(f) upon its adoption into the SIP.

(c) EU-3 Surface Prep: Truck Components

- Surface preparation includes cleaning, assembly, joining, filling, grinding, sanding, washing and sealing. These activities may require the use of solvent-laden rags that must be stored or disposed of in closed containers as per Puget Sound Clean Air Agency Regulation II, Section 3.04(g). This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(f) upon its adoption into the SIP. These activities may require some clean-up of equipment with VOC-containing materials that must be kept in closed containers or tanks except when the VOC-containing materials are in use, or are being added, mixed, or removed. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(e) upon its adoption into the SIP.
- Four prep/sanding booths and the dust collector must be maintained in good working order per Puget Sound Clean Air Agency Regulation I, Section 9.20 and per general operation and maintenance requirements in Puget Sound Clean Air Agency Regulation I, Section 7.09(b). Monitoring for both of these requirements is identified in Requirements I.A.12 and I.A.13 in the Facility-Wide Emissions Limits section above. In addition, Kenworth Renton shall follow the monitoring requirements of Section II.A.2(g) for Dust Collectors.

(d) EU-4 Coating Operations: Truck Components & Chassis

- Puget Sound Clean Air Agency Regulation II, Section 3.04(a) requires that parts or components of vehicles (cars and trucks) be coated with compliant coatings. The applicable compliant coatings are identified in the regulation. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(a) upon its adoption into the SIP.
- Puget Sound Clean Air Agency Regulation II, Section 3.04(c) contains a more liberal coating VOC limit (7.0 lbs/gallon) if it is classified as a specialty coating and does not exceed 5.0% of all coatings applied. If Kenworth Renton uses this type of coating, the volume and VOC content of the specialty coatings applied shall be recorded on a daily basis. The quantity, as a percentage of total coating usage for each day that it was used, will be so noted monthly in Kenworth Renton's Coating Consumption/VOC Quantification Plan and shall be available for Puget Sound Clean Air Agency inspection upon request. This requirement will be superseded

by the 7/24/03 version of Reg. II: 3.04(b) upon its adoption into the SIP: Specialty coatings shall not have VOC content in excess of 7.0 lb/gal. Except for antiglare/safety coatings, specialty coatings shall not exceed 5% of all coatings on a monthly basis. Upon adoption recordkeeping for specialty coatings shall be performed on a monthly basis.

- Puget Sound Clean Air Agency Regulation II, Section 3.04(d) requires Kenworth Renton to provide the maximum calculated VOC content of each coating regulated by Section 3.04. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(c) upon its adoption into the SIP. Coatings are mixed to specification in the paint mix room identified in Emission Unit 8 (EU 8). Compliance with this requirement shall be documented in the Coating Consumption/VOC Quantification Plan and shall be available for Puget Sound Clean Air Agency inspection upon request.
- Puget Sound Clean Air Agency Regulation II, Section 3.04(e) and General Regulatory Order No. 8344 limit application of VOC-containing material on trucks and components to high efficiency spray equipment and hand-application methods. The Puget Sound Clean Air Agency has determined that HVLP and electrostatic spray guns are high efficiency spray equipment and has not approved any other equipment for this process. The permit allows for technology equivalent to HVLP as long as it results in an equivalent transfer efficiency of at least 50%. The Puget Sound Clean Air Agency in General Regulatory Order No. 8344 approved the use of conventional spray equipment as an alternate means of compliance provided that it contains no more than 3.5 lbs/gal VOC. Regulation II, Section 3.04(e) will be superseded by the 7/24/03 version of Reg. II: 3.04(d) upon its adoption into the SIP.
- Puget Sound Clean Air Agency Regulation II, Section 3.04(f). Kenworth Renton must collect all clean-up or other solvent in closed containers. Operators shall be trained and certified in these procedures and perform routine checks to certify compliance. Kenworth's environmental staff shall perform quarterly monitoring to certify compliance. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(e) upon its adoption into the SIP.
- Puget Sound Clean Air Agency Regulation II, Section 3.04(g). Kenworth Renton must keep all clean-up rags and other VOC-containing material in closed containers. Operators shall be trained and certified in these procedures and perform routine checks to certify compliance. Kenworth's environmental staff shall perform quarterly monitoring to certify compliance. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(f) upon its adoption into the SIP.
- Puget Sound Clean Air Agency Order of Approval No. 6074, Condition No. 4 requires Kenworth Renton to use topcoat paint with a VOC limit of 3.5 lbs/gal and primer with a VOC limit of 6.0 lbs/gal. The primer must be applied with HVLP or equivalent spray equipment. No equivalent equipment has been approved; however, employing an equivalent generally refers to a transfer efficiency of 50%, or greater, and this criterion will be used to evaluate other types of spray equipment. The coatings are activated at the gun and the VOC content "as-applied" shall be calculated per component sprayed. Compliance with this requirement shall be documented in the Coating Consumption/VOC Quantification Plan and shall be available for Puget Sound Clean Air Agency inspection upon request.

- Puget Sound Clean Air Agency Regulation I, Section 7.09(b) requires Kenworth Renton to maintain its equipment in good working order. For the paint spray booth, the scope of work includes inspection of the spray coating lines, booths and dry filter systems, where visible, for proper seating and complete coverage over the exhaust plenum. Daily checks are made and a log kept of all activity.

(e) EU-5 Coating Operations: Truck Components & Small Parts

- This emission unit includes the painting of small parts for vehicles in a dry filter paint booth. Puget Sound Clean Air Agency Regulation II, Section 3.04(a) requires that vehicle parts shall be coated with the applicable compliant coatings identified in this section. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(a) upon its adoption into the SIP.
- In case Kenworth Renton uses a “specialty coating” on a truck, its associated small parts may need to be coated with the same as well, and Puget Sound Clean Air Agency Regulation II, Section 3.04(c) applies. The coating is allowed a higher VOC limit (7.0 lbs/gallon) and it cannot exceed 5.0% of all coatings applied. If Kenworth Renton uses this type of coating, the quantity will be so noted in its monthly Coating Consumption/VOC Quantification Plan records. The monitoring method requires Kenworth Renton to calculate the specialty coating usage as a percentage of total coating usage for each day that specialty coatings are used. Compliance with this requirement shall be documented in the Coating Consumption/VOC Quantification Plan and shall be available for Puget Sound Clean Air Agency inspection upon request. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(b) upon its adoption into the SIP: Specialty coatings shall not have VOC content in excess of 7.0 lb/gal. Except for antiglare/safety coatings, specialty coatings shall not exceed 5% of all coatings on a monthly basis. Upon adoption recordkeeping for specialty coatings shall be performed on a monthly basis.
- Puget Sound Clean Air Agency Regulation II, Section 3.04(d) requires Kenworth Renton to provide the maximum calculated VOC content of each coating regulated by Section 3.04. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(c) upon its adoption into the SIP. Coatings are mixed to specification in the paint mix room identified in Emission Unit 8 (EU 8). Compliance with this requirement shall be documented in the Coating Consumption/VOC Quantification Plan and shall be available for Puget Sound Clean Air Agency inspection upon request.
- Puget Sound Clean Air Agency Regulation II, Section 3.04(e) and General Regulatory Order No. 8344 limit application of VOC-containing material on small parts to high efficiency spray equipment and hand-application methods. The Puget Sound Clean Air Agency has determined that HVLP and electrostatic spray guns are high efficiency spray equipment and has not approved any other equipment for this process. The permit allows for technology equivalent to HVLP as long as it results in an equivalent transfer efficiency of at least 50%. The Puget Sound Clean Air Agency has approved the use of conventional spray equipment as an alternate means of compliance provided that it contains no more than 3.5 lbs/gal VOC. Regulation II, Section 3.04(e) will be superseded by the 7/24/03 version of Reg. II: 3.04(d) upon its adoption into the SIP.

- Puget Sound Clean Air Agency Regulation II, Section 3.04(f). Kenworth Renton must collect process solvents in closed containers. Operators shall be trained and certified in these procedures and perform routine checks to certify compliance. Kenworth's environmental staff shall perform quarterly monitoring to certify compliance. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(e) upon its adoption into the SIP.
- Puget Sound Clean Air Agency Regulation II, Section 3.04(g). Kenworth Renton must keep all clean-up rags and other VOC-containing material in closed containers. Operators shall be trained and certified in these procedures and perform routine checks to certify compliance. Kenworth's environmental staff shall perform quarterly monitoring to certify compliance. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(f) upon its adoption into the SIP.
- Puget Sound Clean Air Agency Order of Approval No. 6074, Condition No. 4 requires Kenworth Renton to use topcoat paint with a VOC limit of 3.5 lbs/gal and primer with a VOC limit of 6.0 lbs/gal. The primer must be applied with HVLP or equivalent spray equipment. No equivalent equipment has been approved; however, employing an equivalent generally refers to a transfer efficiency of 50%, or greater, and this criterion will be used to evaluate other types of spray equipment. The coatings are activated at the gun and the VOC content "as-applied" shall be calculated per component sprayed. Compliance with this requirement shall be documented in the Coating Consumption/VOC Quantification Plan and shall be available for Puget Sound Clean Air Agency inspection upon request.
- Puget Sound Clean Air Agency Regulation I, Section 7.09(b) requires Kenworth Renton to maintain its equipment in good working order. For the paint spray booth, the scope of work includes regularly changing-out or maintaining all dry filters. Checks are made and a log kept of all activity.

(f) EU-6 Coating Operations: Truck Components

- This emission unit includes the bulk of the "non-chassis" painting, mostly the exterior part of the truck. Puget Sound Clean Air Agency Regulation II, Section 3.04(a) requires that these components of the vehicle be coated with the applicable compliant coatings identified in this section. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(a) upon its adoption into the SIP.
- In case Kenworth Renton uses a specialty coating (as defined in Puget Sound Clean Air Agency Regulation II definitions), Puget Sound Clean Air Agency Regulation II, Section 3.04(c) applies. The coating is allowed a higher VOC limit (7.0 lbs/gallon) and its use cannot exceed 5.0% of all coatings applied. If Kenworth Renton uses this type of coating, the quantity will be so noted in its monthly Coating Consumption/VOC Quantification Plan records. The monitoring method requires Kenworth Renton to calculate the specialty coating usage as a percentage of total coating usage for each day that specialty coatings are used. Compliance with this requirement shall be documented in the Coating Consumption/VOC Quantification Plan and shall be available for Puget Sound Clean Air Agency inspection upon request. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(b) upon its adoption into the SIP: Specialty coatings shall not have VOC content in excess of 7.0 lb/gal. Except for antiglare/safety coatings, specialty coatings shall not exceed 5% of all

coatings on a monthly basis. Upon adoption recordkeeping for specialty coatings shall be performed on a monthly basis.

- Puget Sound Clean Air Agency Regulation II, Section 3.04(d) requires Kenworth Renton to provide the maximum calculated VOC content of each coating regulated by Section 3.04. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(c) upon its adoption into the SIP. Coatings are mixed to specification in the paint mix room identified in Emission Unit 8 (EU 8). Compliance with this requirement shall be documented in the Coating Consumption/VOC Quantification Plan and shall be available for Puget Sound Clean Air Agency inspection upon request.
- Puget Sound Clean Air Agency Regulation II, Section 3.04(e) and General Regulatory Order No. 8344 limit application of VOC-containing material on these components to high efficiency spray equipment and hand-application methods. The Puget Sound Clean Air Agency has determined that HVLP and electrostatic spray guns are high efficiency spray equipment and has not approved any other equipment for this process. The permit allows for technology equivalent to HVLP as long as it results in an equivalent transfer efficiency of at least 50%. The Puget Sound Clean Air Agency has approved the use of conventional spray equipment as an alternate means of compliance provided that it contains no more than 3.5 lbs/gal VOC. Regulation II, Section 3.04(e) will be superseded by the 7/24/03 version of Reg. II: 3.04(d) upon its adoption into the SIP.
- Puget Sound Clean Air Agency Regulation II, Section 3.04(f). Kenworth Renton must collect process solvents in closed containers. Operators shall be trained and certified in these procedures and perform routine checks to certify compliance. Kenworth's environmental staff shall perform quarterly monitoring to certify compliance. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(e) upon its adoption into the SIP.
- Puget Sound Clean Air Agency Regulation II, Section 3.04(g). Kenworth Renton must keep all clean-up rags and other VOC-containing material in closed containers. Operators shall be trained and certified in these procedures and perform routine checks to certify compliance. Kenworth's environmental staff shall perform quarterly monitoring to certify compliance. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(f) upon its adoption into the SIP.
- Puget Sound Clean Air Agency Order of Approval No. 6074, Condition No. 4 requires Kenworth Renton to use topcoat paint with a VOC limit of 3.5 lbs/gal and primer with a VOC limit of 6.0 lbs/gal. The primer must be applied with HVLP or equivalent spray equipment. No equivalent equipment has been approved; however, employing an equivalent generally refers to a transfer efficiency of 50%, or greater, and this criterion will be used to evaluate other types of spray equipment. The coatings are activated at the gun and the VOC content "as-applied" shall be calculated per component sprayed. Compliance with this requirement shall be documented in the Coating Consumption/VOC Quantification Plan and shall be available for Puget Sound Clean Air Agency inspection upon request.
- Puget Sound Clean Air Agency Regulation I, Section 7.09(b) requires Kenworth Renton to maintain its equipment in good working order. For the paint spray booths, the scope of work includes regularly changing-out or maintaining all spray paint booth dry filters and water

wash systems with associated filter systems, respectively. Daily checks shall be made and a log kept of all activity.

(g) EU-7 Coating Operations: Highway and Off-Highway Trucks and Touch-Up

- This emission unit includes the preparation of vehicles and components for touch-up in Building 1. They are repainted in a dry filter paint booth. Puget Sound Clean Air Agency Regulation II, Section 3.04(a) requires that vehicle parts be coated with the applicable compliant coatings identified in this section. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(a) upon its adoption into the SIP.
- In case Kenworth Renton uses a “specialty coating” on a vehicle or component, the limits of Puget Sound Clean Air Agency Regulation II, Section 3.04(c) apply. The coating is allowed a higher VOC limit (7.0 lbs/gallon) and it cannot exceed 5.0% of all coatings applied. If Kenworth Renton uses this type of coating, the quantity will be so noted in its monthly Coating Consumption/VOC Quantification Plan records. The monitoring method requires Kenworth Renton to calculate the specialty coating usage as a percentage of total coating usage for each day that specialty coatings are used. Compliance with this requirement shall be documented in the Coating Consumption/VOC Quantification Plan and shall be available for Puget Sound Clean Air Agency inspection upon request. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(b) upon its adoption into the SIP: Specialty coatings shall not have VOC content in excess of 7.0 lb/gal. Except for antiglare/safety coatings, specialty coatings shall not exceed 5% of all coatings on a monthly basis. Upon adoption recordkeeping for specialty coatings shall be performed on a monthly basis.
- Puget Sound Clean Air Agency Regulation II, Section 3.04(d) requires Kenworth Renton to provide the maximum calculated VOC content of each coating regulated by Section 3.04. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(c) upon its adoption into the SIP. Coatings are mixed to specification in the paint mix room identified in Emission Unit 8 (EU 8). Compliance with this requirement shall be documented in the Coating Consumption/VOC Quantification Plan and shall be available for Puget Sound Clean Air Agency inspection upon request.
- Puget Sound Clean Air Agency Regulation II, Section 3.04(e) and General Regulatory Order No. 8344 limit application of VOC-containing material on a vehicle or component to high efficiency spray equipment, hand-application methods and a 6.0 lbs/gal VOC limit for topcoat and primer. The Puget Sound Clean Air Agency has determined that HVLP and electrostatic spray guns are high efficiency spray equipment and has not approved any other equipment for this process. The permit allows for technology equivalent to HVLP as long as it results in an equivalent transfer efficiency of at least 50%. When Kenworth Renton has to use conventional spray equipment, the coatings cannot exceed a 3.5 lbs/gal VOC limit. Regulation II, Section 3.04(e) will be superseded by the 7/24/03 version of Reg. II: 3.04(d) upon its adoption into the SIP.

- Puget Sound Clean Air Agency Regulation II, Section 3.04(f). Kenworth Renton must collect process solvents in closed containers. Operators shall be trained and certified in these procedures and perform routine checks to certify compliance. Kenworth's environmental staff shall perform quarterly monitoring to certify compliance. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(e) upon its adoption into the SIP.
- Puget Sound Clean Air Agency Regulation II, Section 3.04(g). Kenworth Renton must keep all clean-up rags and other VOC-containing material in closed containers. Operators shall be trained and certified in these procedures and perform routine checks to certify compliance. Kenworth's environmental staff shall perform quarterly monitoring to certify compliance. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(f) upon its adoption into the SIP.
- Puget Sound Clean Air Agency Order of Approval No. 6074, Condition No. 4 requires Kenworth Renton to use topcoat paint with a VOC limit of 3.5 lbs/gal and primer with a VOC limit of 6.0 lbs/gal. The primer must be applied with HVLP or equivalent spray equipment. No equivalent equipment has been approved; however, employing an equivalent generally refers to a transfer efficiency of 50%, or greater, and this criterion will be used to evaluate other types of spray equipment. The coatings are activated at the gun and the VOC content "as-applied" shall be calculated per component sprayed. Compliance with this requirement shall be documented in the Coating Consumption/VOC Quantification Plan and shall be available for Puget Sound Clean Air Agency inspection upon request.
- Puget Sound Clean Air Agency Regulation I, Section 7.09(b) requires Kenworth Renton to maintain its equipment in good working order. For the paint spray booth, the scope of work includes regularly changing out or maintaining all dry filters. Daily checks are made and a log kept of all activity.

(h) EU-8 Coating Mix/Solvent System

- This emission unit includes the area where the coatings are mixed, stored and distributed. It is here that the coatings are formulated to meet Puget Sound Clean Air Agency Regulation II, Section 3.04(a). The coatings must meet the applicable compliant VOC limits identified in this section. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(a) upon its adoption into the SIP.
- In case Kenworth Renton mixes and distributes a "specialty coating" on a truck part or component, Puget Sound Clean Air Agency Regulation II, Section 3.04(c) applies. The coating is allowed a higher VOC limit (7.0 lbs/gallon) and it cannot exceed 5.0% of all coatings applied. If Kenworth Renton uses this type of coating, the quantity will be so noted in its monthly Coating Consumption/VOC Quantification Plan records. The monitoring method requires Kenworth Renton to calculate the specialty coating usage as a percentage of total coating usage for each day that specialty coatings are used. Compliance with this limit shall be documented in the Coating Consumption/VOC Quantification Plan and shall be available for Puget Sound Clean Air Agency inspection upon request. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(b) upon its adoption into the SIP: Specialty coatings shall not have VOC content in excess of 7.0 lb/gal. Except for antiglare/safety coatings, specialty coatings shall not exceed 5% of all coatings on a monthly

basis. Upon adoption recordkeeping for specialty coatings shall be performed on a monthly basis.

- Puget Sound Clean Air Agency Regulation II, Section 3.04(d) requires Kenworth Renton to provide the maximum calculated VOC content of each coating regulated by Section 3.04. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(c) upon its adoption into the SIP. Coatings are procured and mixed here according to the requirements set forth in the CPIS System and Coating Consumption/VOC Quantification Plan as explained in Section II of the operating permit. This plan shall be available for Puget Sound Clean Air Agency inspection upon request.
- Puget Sound Clean Air Agency Regulation II, Section 3.04(f). Kenworth Renton must collect process solvents in closed containers. Operators shall be trained and certified in these procedures and perform routine checks to certify compliance. Kenworth's environmental staff shall perform quarterly monitoring to certify compliance. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(e) upon its adoption into the SIP.
- Puget Sound Clean Air Agency Regulation II, Section 3.04(g). Kenworth Renton must keep all clean-up rags and other VOC-containing material in closed containers. Operators shall be trained and certified in these procedures and perform routine checks to certify compliance. Kenworth's environmental staff shall perform quarterly monitoring to certify compliance. This requirement will be superseded by the 7/24/03 version of Reg. II: 3.04(f) upon its adoption into the SIP.
- Puget Sound Clean Air Agency Order of Approval No. 6074, Condition No. 4 requires Kenworth Renton to use topcoat paint with a VOC limit of 3.5 lbs/gal and primer with a VOC limit of 6.0 lbs/gal. The primer must be applied with HVLP or equivalent spray equipment. No equivalent equipment has been approved; however, employing an equivalent generally refers to a transfer efficiency of 50%, or greater, and this criterion will be used to evaluate other types of spray equipment. The coatings are activated at the gun and the VOC content "as-applied" shall be calculated per component sprayed. Compliance with this requirement shall be documented in the Coating Consumption/VOC Quantification Plan and shall be available for Puget Sound Clean Air Agency inspection upon request.

(i) EU-9 Fuel Burning

This emission unit consists of all fuel burning equipment greater than 5 MMBtu/hr heat input, including makeup air heaters (MAUs) and air supply houses (ASHs). It does not apply to Kenworth Renton's internal combustion engine that powers stationary equipment, a diesel pump that controls a 300,000-gallon water tank and an emergency generator. All MAUs and ASHs are fired on pipeline quality natural gas only. No equipment can burn diesel fuel and would need Puget Sound Clean Air Agency approval to do so. The monitoring method requires that Kenworth Renton monitor for opacity every time it switches fuels on MAUs and ASHs greater than 5 MMBtu/hr heat input. The MAUs and ASHs do not require maintenance more frequently than other combustion units that are insignificant units of lesser heat input, and addressed in "Section I.A (Facility-Wide)." However, in Conditions EU 9.2 and 9.3, Puget Sound Clean Air Agency Order of Approval No. 6074, Conditions No. 6 and No. 7 limit Kenworth Renton to 421 MMCF of natural gas per year and require a 12-month running total be kept for inspection upon

Puget Sound Clean Air Agency request. This requirement was originally established in Order of Approval No. 4895.

VII. MONITORING, MAINTENANCE AND RECORDKEEPING PROCEDURES

Kenworth Renton must follow the procedures contained in Section II of the permit, Monitoring, Maintenance and Recordkeeping Procedures. Failure to follow a requirement in Section II may not necessarily be a violation of the underlying applicable emission standard in Section I. However, not following a requirement of Section II is a violation of Section II and Kenworth Renton must report such violations, as well as violations or deviations from any other permit condition, as a deviation under Section V.Q.1 of the permit. In addition, all information collected as a result of implementing Section II can be used as credible evidence under Section V.N.2 of the permit. Reporting a permit deviation and taking corrective action does not relieve Kenworth Renton from its obligation to comply with the underlying applicable requirement.

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

The permit requires Kenworth Renton to conduct quarterly facility-wide inspections. These inspections are to include checking for prohibited activities under Section III of the permit and activities that require additional approval under Section IV of the permit, as well as checking for any “nuisance” odor bearing contaminants. The Puget Sound Clean Air Agency determined the frequency of these inspections after considering the potential for emissions, the lack of federally required monitoring, Kenworth Renton in-house training practices and similar factors. If problems are identified, Kenworth Renton has the responsibility to not only correct the specific problem, but also to adjust the work practices and training to prevent future problems.

In determining the appropriate monitoring frequencies for monitoring identified in Section II.A of the permit, the Puget Sound Clean Air Agency considered several factors, including the following:

- Kenworth Renton’s compliance history and the likelihood of violating the applicable requirement.

- The complexity of the emission unit including the variability of emissions over time.
- The likelihood that the monitoring would detect a compliance problem.
- The likely environmental impacts of a deviation.
- Whether add-on controls are necessary for the unit to meet the emission limit.
- Other measures that Kenworth Renton may have in place to identify problems.
- The type of monitoring, process, maintenance, or control equipment data already available for the emissions unit.
- The technical and economic considerations associated with the range of possible monitoring methods.
- The type of monitoring found on similar emissions units.

VIII. DEVIATIONS

“Deviation” means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or recordkeeping required by the air operating permit. For a situation lasting more than 24 hours which constitutes a deviation, each 24 hour period is considered a separate deviation. Included in the meaning of deviation are any of the following situations:

- Emissions exceed an emission limitation or standard;
- Process or emissions control device parameter values indicate that an emission limitation or standard has not been met;
- Observations or data collected demonstrates noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit; or
- An exceedance or an excursion, as defined in 40 CFR 64, occurs.

IX. PROHIBITED ACTIVITIES

Some of the requirements Kenworth Renton identified in the operating permit application are included in Section III as prohibited activities. Since these activities are prohibited, routine monitoring of parameters is not appropriate. Instead, Puget Sound Clean Air Agency has listed these activities in this section to highlight that they cannot occur at the facility.

Puget Sound Clean Air Agency Regulation I, Section 9.13 and WAC 173-400-040(7) contain similar requirements addressing concealment and masking of emissions. Although both requirements apply, the permit language has been simplified by grouping these requirements together.

A. Activities Requiring Additional Approval

Some of the requirements Kenworth Renton identified in the operating permit application are included in Section IV as activities that require additional approval. For new source review, the permit language has been simplified. Both the state (WAC 173-400-110 and Chapter 173-460 WAC) and Puget Sound Clean Air Agency (Regulation I, Article 6) new source review programs

require approval to construct, install, establish, or modify an air contaminant source. All these requirements apply, but the language in these requirements has been incorporated into one section to simplify the permit language.

B. Standard Terms and Conditions

Some of the requirements Kenworth Renton identified in the operating permit application are included in Section V, Standard Terms and Conditions. This provided an easier mechanism for describing requirements that are more general in nature. This section also contains the standard terms and conditions specifically listed in WAC 173-401-620.

X. BASIS FOR INAPPLICABLE REQUIREMENTS

The requirements listed in Section VIII of Kenworth Renton's air operating permit do not apply to the facility, or to the specific emissions units listed in the permit for the reasons listed below. The permit shield applies to all requirements so identified.

- 40 CFR Part 60 Subpart MM does not apply because no surface coating of automobiles or light duty trucks occurs at Kenworth Renton. Kenworth Renton is prohibited from doing this type of surface coating until it receives approval from the Puget Sound Clean Air Agency first.
- Kenworth Renton requested that Puget Sound Clean Air Agency determine that, with the exception of part 61.145 for asbestos, 40 CFR Part 61 does not apply. The application does not give enough information to determine if this applies, and the permit does not prohibit these operations. Therefore, the Puget Sound Clean Air Agency cannot determine that 40 CFR 61 is inapplicable. Similarly, the Puget Sound Clean Air Agency cannot determine that WAC 173-400-075(1) and (3) and Puget Sound Clean Air Agency Regulation III, Section 2.02 are not applicable requirements.
- 40 CFR 82, Subpart A does not apply because Kenworth Renton does not manufacture or import Class I or II substances and would need Puget Sound Clean Air Agency and or EPA approval to do so.
- 40 CFR 82, Subpart B does not apply because Kenworth Renton 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 C was identified as an inapplicable requirement in the application, because Kenworth Renton does not sell or distribute Class I substances or nonessential products containing or manufactured with Class II substances. However, nothing in the permit prohibits Kenworth Renton from doing so. Therefore, the Puget Sound Clean Air Agency cannot determine that it is an inapplicable requirement.
- 40 CFR 82, Subpart D does not apply because Kenworth Renton is not a federal agency.
- 40 CFR 82, Subpart E does not apply because Kenworth Renton does not use Class I substances directly in manufacturing processes or manufacture products containing Class I substances and would have to apply for approval before using a Class I CFC.

- RCW 70.94.980 was identified as an inapplicable requirement in the application because Kenworth Renton does not sell regulated refrigerant in containers designed for consumer recharge of refrigerant systems or sell nonessential consumer products containing CFCs. However, nothing in the permit prohibits Kenworth Renton from doing so. Therefore, the Puget Sound Clean Air Agency cannot determine that it is an inapplicable requirement.
- Puget Sound Clean Air Agency Regulation I, Section 5.03 is inapplicable per statute RCW 70.94.161(17). Kenworth Renton 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.
- Puget Sound Clean Air Agency Regulation I, Section 9.09(b) is inapplicable because no continuous emission monitoring systems are required at this site.
- Puget Sound Clean Air Agency Regulation I, Article 12 does not apply because there are no continuous emission monitoring systems operating or are required to operate at this site.
- RCW 70.94.531 does not apply to emissions from a stationary source.
- WAC 173-400-040(3)(b) does not apply because no emission units at Kenworth Renton have been designated a significant contributor of pollutant to a nonattainment area.
- WAC 173-400-040(8)(b) does not apply because no emission units at Kenworth Renton have been designated a significant contributor to a PM-10 nonattainment area.
- Kenworth Renton requested that the Puget Sound Clean Air Agency determine that WAC 173-400-050 is inapplicable because Kenworth Renton does not have a combustion source as defined in WAC 173-400-030(14). WAC 173-400-050 lists requirements for “combustion and incineration emissions units,” which Kenworth Renton has, and WAC 173-400-030(14) exempts certain “combustion and emission sources,” of which Kenworth Renton has none. Therefore, the Puget Sound Clean Air Agency cannot determine that WAC 173-400-050 is inapplicable.
- WAC 173-470, 474, 475, and 480 do not apply because Ambient Air Quality Standards do not apply to stationary sources.
- Kenworth requested that the Puget Sound Clean Air Agency determine that Chapter 173-481 WAC is inapplicable, because Kenworth Renton does not emit fluorides. Puget Sound Clean Air Agency cannot make a determination of inapplicability on those grounds alone. Chapter 173-481 WAC contains fluoride ambient standards and a requirement to monitor ambient fluoride when required by Ecology. In general, ambient standards are not “applicable requirements” as defined by the WAC 173-401-200. At the time of permit issuance, Ecology has not required Kenworth Renton to conduct ambient monitoring for fluoride; therefore, Puget Sound Clean Air Agency has determined that Chapter 173-481 WAC is an inapplicable requirement.
- Kenworth Renton requested that the Puget Sound Clean Air Agency determine that several sections of Chapter 173-490 WAC are inapplicable. The Chapter applies to sources of VOCs located in an ozone nonattainment area. Kenworth Renton is located in an area that is currently attainment for ozone. However, if the area becomes nonattainment for ozone

during the term of the permit, some of those sections may become applicable requirements. Therefore, the Puget Sound Clean Air Agency cannot determine that any section of Chapter 173-490 WAC is inapplicable.

- 40 CFR 60 Subpart Kb does not apply to the existing tanks since Kenworth does not have any storage tanks with a storage capacity of greater than 40 m³ (10,568 gal) and will need approval to install any such tanks.
- Puget Sound Clean Air Agency Regulation II, Section 2.04 is inapplicable to the existing tanks because all volatile organic compound storage tanks are less than 40,000 gallons in capacity.
- WAC 173-460-060(6)(a) is inapplicable because Kenworth Renton does not engage in abrasive blasting; and if Kenworth Renton wanted to do any abrasive blasting, it would have to obtain a permit modification.
- Kenworth Renton requested that the Puget Sound Clean Air Agency determine that Regulation II, Section 3.04(b) is inapplicable because Kenworth Renton does not coat Group II vehicles. Section 3.04(b) also covers mobile equipment where color match is not required. Since nothing in the permit prohibits coating of mobile equipment, given the information in the application, the Puget Sound Clean Air Agency cannot determine that Regulation II, Section 3.04(b) is inapplicable.
- Puget Sound Clean Air Agency Regulation III, Section 2.01(a)(9) excludes Motor Vehicle and Mobile Equipment Coating Operations subject to Puget Sound Clean Air Agency Regulation II, Section 3.04 from regulations under Regulation III, Article 2. Other parts of Article 2 (such as Sections 2.05 and 2.07) are applicable to the non-motor vehicle coating operations at Kenworth Renton.
- Puget Sound Clean Air Agency Regulation I, Section 9.08(a) is inapplicable because Kenworth Renton does not have any fuel burning equipment that is capable of burning fuel oil. If Kenworth Renton decides to install or modify an applicable unit to burn oil, it would need to apply for approval from Puget Sound Clean Air Agency first.

XI. BASIS FOR INSIGNIFICANT EMISSION UNITS

WAC 173-401-530 contains criteria for identifying insignificant emission units or activities for purposes of the operating permit program. Designation of an emission unit or activity as insignificant for purposes of this chapter does not exempt the unit or activity from any applicable requirement. An emission unit or activity is insignificant based on one or more of the following approaches:

(a) Actual emissions of all regulated air pollutants from a unit or activity are less than the emission thresholds established in subsection (4) of WAC 173-401-530. Such emission units and activities must be listed in the permit application;

(b) The emission unit or activity is listed in WAC [173-401-532](#) as categorically exempt. Such emission units or activities do not have to be listed in the permit application;

(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. These emission units or activities must be listed in the permit application.

(d) The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)), which are subject to no applicable requirement other than generally applicable requirements of the state implementation plan as defined in subsection (2) of this section. These units or activities must be listed on the permit application.

Kenworth identified several items of equipment that qualify as insignificant due to capacity below the specified levels in WAC 173-401-533. These items of equipment were listed as insignificant emission units in Section IX of the AOP. Monitoring requirements for insignificant emission units are detailed in Section II.B.2 of the AOP. In essence, Kenworth will be required to use good industrial practices to maintain insignificant emission units, and to promptly repair defective equipment or shut down the unit until defective equipment can be repaired. Kenworth won't have to keep records of maintenance of insignificant emission units except when such equipment is inspected and a problem requiring prompt repair is discovered during a quarterly plant-wide inspection.

XII. EXCLUSION OF ADJACENT PACCAR FACILITIES FROM THE KENWORTH RENTON TITLE V PERMIT

This section of the SOB contains a May 27, 2003 letter from the Puget Sound Clean Air Agency to Kenworth Renton which describes a determination made by the Agency as to whether several contiguous operations and/or properties should be included in the Kenworth Renton air operating permit.

May 27, 2003

Richard A. Sklar
Kenworth Truck Co.
P.O. Box 9001
Renton, WA 98057

Dear Richard:

Kenworth Truck Co. (Renton)
Air Operating Permit No. 17796
Kenworth Air Operating Permit & PACCAR Contiguous Properties

This letter has been written to document our review of the status of adjacent PACCAR-related operations on property which is contiguous to existing Kenworth–Renton operations as it relates to the operating permit for the Kenworth–Renton operations.

We appreciate you coming to our office for a meeting to discuss this on December 5, 2002, as well as your efforts to supplement the records with your submittals dated January 17, 2003 and March 12, 2003. Based on our discussions and the documentation you provided, our understanding is that there are four different operations (in addition to the Kenworth–Renton truck) located on or adjacent to the truck manufacturing activities. These include:

- Kenworth Research & Development (R&D)
- PACCAR Parts Warehouse & Division Offices
- Information Technology (IT) Division (PACCAR)

- Dallas & Mavis truck delivery contractor

The first three operations are managed by PACCAR, the parent corporation for Kenworth, and are not operationally related to the truck production activities. Their presence at this site reflects the availability of space owned by PACCAR and is coincidental to the location of the truck manufacturing plant. The Kenworth R&D facility supports the product development efforts of the Kenworth Truck Co., which includes plants in other locations. The parts warehouse and IT activities have no operational linkages to the Kenworth-Renton truck production activities. The Dallas & Mavis operation is related to the truck production in that they are the delivery contractor for completed trucks. However, there are no regulated emission generating activities on this site as a result of the work and presence of Dallas & Mavis.

During an inspection visit, this Agency raised the question as to whether or not the Kenworth R&D facility should be included in the operating permit for the truck production plant. In the subsequent discussions, all of the PACCAR owned activities were included in the applicability analysis.

The information provided by Kenworth (and PACCAR) reviewed the definition of "major source" from the operating permit regulation (Chapter 173-401 WAC) as applied to the activities at the Kenworth Renton facility. The definitions of "major source" as used in other EPA programs were discussed as well. The questions considered in that information compared the additional operational activities at the site in relation to the core activities at Kenworth-Renton truck manufacturing plant. Those questions included:

- Are the operations on contiguous or adjacent property?
- Are the operations under common control?
- Do the operations have the same SIC code (first 2-digits)?
- Is the secondary operation a support facility to the truck manufacturing plant (e.g. >50% of output supports Kenworth-Renton, stand alone capability)?

The conclusion of the Kenworth analysis was that none of the facilities reviewed need to be included in the Kenworth-Renton air operating permit. This Agency agrees with that conclusion, although not for all of the reasons identified in the analysis we reviewed.

The analysis put a great deal of emphasis on the SIC code and the fact that separate codes can be identified for each of the reviewed Kenworth and PACCAR owned operations. The separate SIC codes identified would be more meaningful for those operations if they independently sold those services on their own. However, the reality is that these Kenworth and PACCAR operations operate in direct support of the larger corporate businesses of Kenworth and PACCAR, but not the truck manufacturing operations at the Renton plant. We agree with the analysis that these Kenworth and PACCAR owned operations, while co-located with the Kenworth-Renton truck plant, are not support activities for truck manufacturing operations at the Renton plant.

The Dallas & Mavis operations at the Kenworth-Renton plant are a support activity for this plant and the contractual relationship with PACCAR does not change that circumstance. We have other operating permit sources which have contractors operating within the boundaries of their facility, and the owner of the source is responsible for the contractor's activities within the scope of their operating permit. For the Kenworth-Renton facility, it is a moot point, as the Dallas & Mavis operations do not involve any regulated emission units or specific permit requirements under the operating permit.

In conclusion, the scope of the current operating permit is correct. The additional Kenworth and PACCAR owned activities reviewed in this letter are not included in the permit and, as presently operated, should not be added to the permit in the future. The Dallas & Mavis activities can be considered within the scope of the operating permit (even though not specifically identified as an emission unit or activity), yet their operations would only fall within the facility wide requirements of the permit. If Kenworth decided to use R&D facilities to complete a manufacturing activity on a truck for delivery from the Renton plant (e.g. overflow or relief for equipment breakdown), then this conclusion would be invalid and the R&D facility would need to be included in the permit.

If you have any questions about this matter, please contact me at (206) 689-4052 or Alan Butler at (206) 689-4063.

Sincerely,

Steven M. Van Slyke, P.E.
Supervisory Engineer

SMV:ms

cc: Carole Robins, PACCAR
Alan Butler
Melissa McAfee

XIII. PERMIT RENEWAL ~ EXPLANATION OF CHANGES

Kenworth Renton submitted their application for a renewal of their AOP on August 24, 2004. The application consisted of a cover letter and “marked up” copies of the existing AOP and SOB. On September 2, 2004 the Puget Sound Clean Air Agency sent a letter to Kenworth indicating that the renewal application had been found to be complete.

On March 20, 2006 Kenworth requested that the name of the responsible official be changed. This change was incorporated into the draft AOP renewal on March 27, 2006 rather than as an Administrative change to the current AOP.

The format of the AOP was changed to the latest Agency form, and numerous regulatory references throughout the AOP were updated due to rule changes since the last time the permit was open. No substantive changes to the permit were requested by Kenworth or made by the Puget Sound Clean Air Agency; changes involving decisions by the Agency, or that were otherwise substantive, are described below:

A. Changes throughout Section I (tables of requirements)

- The tables in Section I have been changed. Previously, facility-wide requirements and requirements for each emission unit were expressed in two tables each. The first table contained requirements that were in the State Implementation Plan (SIP) and were therefore “federally enforceable,” immediately followed by a second table with the requirements that were “*STATE ONLY*.” Also, there was a rather lengthy notation below each of the old, federally enforceable requirements stating that the requirement would be superseded by the new requirement, once that new requirement was adopted into the SIP. The new table style consolidates the two-table system into a single table for facility wide requirements and for each emission unit requirement. The notations below each of the “dual” requirements have been replaced with a single explanation of the SIP and *STATE ONLY* adoption process and the display conventions used in all the tables. This one-time explanation is contained in the paragraph between the Section I heading and the requirements tables. The *STATE ONLY* requirements are shown with their federally enforceable counterparts, with the dates *italicized*, as shown below:

Reqmnt No.	Enforceable Requirement	Adoption or Effective Date	Requirement Paraphrase (Information Only)
Opacity Standards			
I.A.2	Puget Sound Clean Air Agency Reg I: 9.03 (except for 9.03(e))	3/11/99	Kenworth shall not emit any air pollutants which exhibit greater than 20% opacity for a period or periods aggregating more than 3 minutes in any hour
	Puget Sound Clean Air Agency Reg I: 9.03 (STATE ONLY)	3/25/04	
	WAC 173-400-040(1)	9/23/93	
	WAC 173-400-040(1) (STATE ONLY)	9/15/01	

B. Changes in Facility-wide applicable requirements

I.A.1: The generic wording from the very beginning of WAC 173-400-040 was inserted here. This requirement states that all emissions units are required to use, at a minimum, reasonably available control technology (RACT). Also, if two emissions units emit into a single stack, and we can't tell which pollutants are coming from which source, the most restrictive requirements that would apply to the individual emissions units apply to the common stack.

C. Monitoring, Maintenance and Recordkeeping Procedures

II.A.2.(b): The Coating Consumption/VOC Quantification Plan was split into the following sub-categories:

- (i) General,
- (ii) Specialty coatings,
- (iii) Plural component paint mixes,
- (iv) Calculation of monthly average VOC content,
- (v) Calculation of monthly average HAP content (this subsection contains the monitoring methods, recordkeeping, and notification requirements of Puget Sound Clean Air Agency Order No. 8884, Conditions 2 through 4),
- (vi) Monthly review of records, and
- (vii) Revision provision.

II.A.2(e): The monitoring method has not changed, but the regulatory citation has. The citation used to say: "This Condition modifies and supercedes General Regulatory Order No. 6654, which was issued on April 10, 1997." Now the citation says: "[Puget Sound Clean Air Agency General Regulatory Order No. 8344, Condition 2]. After adoption into the SIP of the 7/24/03 version of Puget Sound Clean Air Agency Regulation II:

3.04, this monitoring and recordkeeping procedure will be an alternative means of compliance with Regulation II, Section 3.04(d).”

- II.A.2(f): Kenworth has requested that the frequency for this monitoring activity (physical inspection of spray coating lines, booths and filter systems) be reduced from once per day to once per week, because they have never received any violations regarding these monitoring requirements. The Puget Sound Clean Air Agency has not made the requested change. The fact that Kenworth has not received notices of violation on their spray booths may just be an indication that the monitoring frequency should not be reduced. Monitoring frequency could be reduced if Kenworth modified their air supply system so that air could only be supplied to the spray guns when the pressure drop across the filters was in the correct range.
- II.A.2(g): The monitoring method has been modified slightly to include corrective action requirements. Kenworth has requested that the frequency for this monitoring activity (inspection of baghouses) be reduced from once per month to once per calendar quarter, because they have never received any violations regarding these monitoring requirements. Agency inspectors have seen problems with the ductwork to the baghouses during annual inspections. The Puget Sound Clean Air Agency has made the requested change.

D. Prohibited Activities

- III.F. The section on Ambient Standards has been deleted, because the underlying requirement, Puget Sound Clean Air Agency Reg I: 11.01 is not in the SIP, and the State Only version has been deleted from Regulation I.

E. Standard Terms & Conditions

- V.Q(1) through (3) These sections on reporting have been completely overhauled in an effort to improve readability, yet not change any of the legal requirements.
- V.Q(4) Emission Reporting, which used to be in Section V.R, has been moved in with the rest of the reporting requirements, into V.Q.4.
- V.Q(5) A table listing basic reports has been added.
- V.Z. A new table, containing insignificant emission units and the basis for insignificant emission unit (IEU) designation, has been added to the end of Section V.Z. Section V.Z. has been revised to include new wording to accommodate the changes in WAC 173-401-530(2) with regard to monitoring of insignificant emissions units. Inclusion of this new wording, which was developed after several meetings with EPA Region X, is mandatory.

XIV. PUBLIC COMMENTS AND RESPONSES DURING RENEWAL PROCESS

Comments were received from one party, the applicant. Those comments and Agency responses are presented below:

A. Comments on the AOP by Kenworth Trucking Company, with responses by Puget Sound Clean Air Agency

1. Page 1 of 73, "Expiration Date" in the Header and in the middle of page: Kenworth wants to reiterate that the compliance year for Kenworth will remain August 24 to August 23 (see Section V.M of permit). Therefore Kenworth expects that the expiration date of the renewal permit will be August 23, 2011.

Puget Sound Clean Air Agency Response:

Puget Sound Clean Air Agency policy for AOP renewals is to set the issue date of the renewal as the actual issue date of the renewal rather than to arbitrarily hold the permit to the issue date of the original permit. Permit expiration date for the renewal is five years after the issue date of the renewal. The annual compliance certification and semi-annual certification of reports period and due dates will not be changed, however.

2. Page 1: Change Facility Address zip code to "98057."

Puget Sound Clean Air Agency Response:

Change made.

3. Page 3, second paragraph: There are numerous requirements in the permit that become enforceable when the EPA approves the state or local requirements into the SIP. "This replacement will take place automatically, with no changes being made to this permit until the permit is renewed." The new requirements are immediately federally enforceable.

Kenworth requests that there be a requirement for PSCAA to formally notify Kenworth when requirements identified as "state only" in this permit are approved into the SIP and therefore become federally enforceable and the prior requirements are superseded.

Puget Sound Clean Air Agency Response:

Puget Sound Clean Air Agency recommends that Kenworth sign up for Regulation Updates on the Puget Sound Clean Air Agency web site, by visiting:

<http://www.pscleanair.org/news/agencynews.aspx>

4. THROUGHOUT PERMIT: In the Requirement paraphrase please add a period at the end of the sentence where it is missing in the following conditions:

I.A.2, I.A.4, I.A.6, I.A.7, I.A.8, I.A.9, I.A.11(a)(4), I.A.12, I.A.13, I.A.14, EU-1.1, EU-1.2, EU-1.5 (three periods), EU-1.6, EU-1.7, EU-2.1, EU-2.2, EU-3.1, EU-3.2, EU-4.1, EU-4.2, EU-4.5 (two periods), EU-4.6, EU-4.7, EU-4.9, EU-5.1, EU-5.2, EU-5.4 (two periods), EU-5.5, EU-5.6, EU-5.9, EU-6.1, EU-6.2, EU-6.4 (two periods), EU-6.5, EU-6.6, EU-6.9, EU-7.1, EU-7.2, EU-7.4 (two periods), EU-7.5, EU-7.6, EU-7.9, EU-8.1, EU-8.4, EU-8.5, EU-9.1, and EU-9.5.

Puget Sound Clean Air Agency Response:

Changes made.

5. THROUGHOUT PERMIT: Please delete all references to “~~Group I~~” and “~~Group II~~” vehicles. While the older version of PSCAA Reg I: 3.04 did differentiate between Group I and Group II vehicles, the most recent version adopted 7/24/03 does not. The new regulation applies to OEMs of “motorized vehicles.” Therefore, because this renewal permit will be in place for the next five years, Kenworth prefers to use the most recent description of the regulation. For example EU-1.5, first paragraph in the Requirement Paraphrase is proposed to read as follows: “VOC-containing material shall be applied to vehicles and mobile equipment by approved method.”

Puget Sound Clean Air Agency Response:

Changes made.

6. THROUGHOUT PERMIT, Reference Test Method Column: All of the EPA Reference Test Method dates are stated as July 1, 2003. Please review these dates and revise if a more current version exists for a method.

Puget Sound Clean Air Agency Response:

Changes made, all except I.A.7, which was accidentally left out. It was not changed in the AOP, because that may go beyond an “administrative change,” and, according to the emissions testing page on EPA’s TTN web site, Methods 26 and 26A were last revised on October 24, 2000.

7. Page 10, I.A.12, Requirement Paraphrase: Please change to “Kenworth shall maintain equipment as defined in Section 1.07 or control equipment not subject to Puget Sound Clean Air Agency Reg. I, Section 9.20(a) in good working order.” This is the exact wording of Reg. I, Section 9.20(b).

Puget Sound Clean Air Agency Response:

Change made.

8. Page 39, EU-9.4, Requirement Paraphrase: Please delete “~~@ 7% O₂~~” to bring the paraphrase in line with Reg.I:9.09 for equipment used in a manufacturing process which does not include that information following the particulate limit.

Puget Sound Clean Air Agency Response:

Change not made. Emission Unit 9 is fuel burning equipment.

9. Pages 41, 42, and 46, II.A.1(a), II.A.1(b), II.A.1(c) 2nd and 3rd paragraphs, II.A.2(f), and II.A.2(g): Where ever “24 hours” or “~~within 24 hours of~~” is used, please replace with either “the end of the next working day” or “the end of the next working day after”, as appropriate. The basis for this comment is if an incident occurs late on a Friday afternoon and no work is scheduled to occur over the weekend then the corrective action would begin on Monday, (the next working day).

Puget Sound Clean Air Agency Response:

The requested change was not made. Sometimes repairs can only be made is when the unit is shut down. If Kenworth is planning to be shut down for several days and does not want to make repairs until they start up again, they also have the options of measuring actual emissions using the reference method or even shutting the unit down until repairs can be made. If the unit already *is* shut down, the 24-hour repair option should not be unduly burdensome.

10. Page 42, II.A.1(c): Please change “~~correct~~” to “initiate corrective action for”.

Puget Sound Clean Air Agency Response:

Change made.

11. Page 43, II.A.2(b)(ii): Kenworth requests that a Data Recovery clarification statement be added to the daily portion of this condition. Kenworth requests the following be added: “Kenworth shall recover valid daily monitoring data for at least 90% of the days that specialty coatings are used.”

The basis for this request: Section V.P of Kenworth’s CURRENT permit states that “Kenworth shall recover valid monitoring and recordkeeping data for at least 90 percent of all periods over which data are averaged or, if no averaging is used, collected, during each month in which this permit requires monitoring of a process or parameter.”

Section V.P (page 55) of the proposed renewal permit addresses data recovery and proposes significantly more stringent data recovery of 100%. WAC 173-401-615(1)(b), 10/17/2002, is cited as the underlying requirement. Please review WAC 173-401-615(1)(b). It does not require 100% data recovery. What is required is “periodic monitoring sufficient to yield reliable data from the relevant time period that are representative of the source’s compliance with the permit...” The dictionary definition of “representative” is “serving as a typical or characteristic example.” Clearly, something less than 100% is adequate to meet the intent of this recordkeeping requirement.

Data recovery of at least 90 percent is more than adequate to ensure compliance with the permit’s recordkeeping, computational, inspection, or other monitoring requirements.

Every day at Kenworth, 185 data inputs are recorded in the paint department alone. A requirement for 100 percent data recovery would unnecessarily elevate recordkeeping above all other plant functions, and place an undue hardship on the plant.

Puget Sound Clean Air Agency Response:

Change not made. The 100% data recovery requirement is in all new AOPs issued by the Puget Sound Clean Air Agency.

12. Page 45, II.A.2(f): Kenworth requests that a Data Recovery clarification statement be added to this condition. Kenworth requests the following be added: “Kenworth shall recover valid daily monitoring data for at least 90% of the days that each booth is operated.”

The basis for this request is the same as the above comment to Page 43, II.A.2(b)(ii).

Puget Sound Clean Air Agency Response:

Change not made. The 100% data recovery requirement is in all new AOPs issued by the Puget Sound Clean Air Agency.

13. Page 46, II.A.2(f): Please change “~~correct~~” to “initiate corrective action for”.

Puget Sound Clean Air Agency Response:

Change made. Plus, the AOP was searched for other locations where the change could be made and non were found.

14. Page 43, §II.A.2(b)(ii) Specialty Coatings: The second half of the paragraph discusses the recordkeeping requirements after the adoption into the SIP of the 7/24/03 version of PSCAA Reg. II §3.04(b). The beginning of the last sentence should be changed: “Within 60 ~~30~~ days after the end of each month that specialty coatings are used...”

The purpose of the 7/24/03 version of 3.04(b) was to eliminate the daily recordkeeping. However, it takes up to 60 days to collect all the purchasing data to determine material usage, including specialty coatings. [This is why paragraph (iv), “Calculation of monthly average VOC content”, allows 60 days to calculate average VOC contents per gallon. Paragraph (v), which is a new requirement, also allows 60 days for recordkeeping.] So, unless paragraph (ii) is changed to 60 days to complete the report, Kenworth will have to record and check specialty coating usage daily anyway, and the change to monthly reporting does not accomplish the objective of reducing paperwork.

Puget Sound Clean Air Agency Response:
Change made.

15. Page 46, II.A.2(f): Please add a period at the end of the last sentence.

Puget Sound Clean Air Agency Response:
Change made.

16. Page 47, III.E, citation at end: PSCAA Reg I: 9.13(b) addresses masking. Therefore change the reference of 9.13(a) to 9.13(b).

Puget Sound Clean Air Agency Response:
Change made.

17. Page 49, IV.D(a): Change “~~Brunswick.~~” to “Kenworth.”

Puget Sound Clean Air Agency Response:
Change made.

18. Page 53, V.N(1), second sentence: Typo; change “~~conduct~~” to “conducts”.

19. Page 53, V.N(1), 3rd paragraph, first sentence: For clarification please insert the words “Reference Test Method” prior to “compliance test.”

Puget Sound Clean Air Agency Response:
Change not made. The words were left “as is” in order to more closely follow the wording in Section 3.07 of Puget Sound Clean Air Agency Regulation I.

20. Page 55, V.O(4) first sentence: Please change “~~required by the O&M Plan and Section II.A~~” to “required by Section II.A and II.B”. The basis for this change is because Section II.B, last sentence, excludes from the permit those O&M Plan provisions that are not required by Section II.A. Also, Section V.P (Data recovery) states that Kenworth shall recover recordkeeping data for each parameter according to any specific recordkeeping requirements identified in Section II of the permit. (It does not state that Kenworth shall also recover recordkeeping data for each parameter that Kenworth may include in its O&M Plan).

Therefore V.O(4) needs to be further clarified so it is clear that recordkeeping is not required by the AOP for sections of the O&M Plan that are NOT required by Section II.A of the permit. Kenworth is committed to maintaining its equipment in good working order and typically conducts monitoring and maintenance that is above and beyond the requirements in Section II.A of the permit. However Kenworth strongly believes that Title V recordkeeping (and possible resultant reporting) requirements should NOT be imposed on the extraneous monitoring and maintenance that is performed. This would cause an undue burden.

Puget Sound Clean Air Agency Response:

Change made.

21. Page 55, V.O: Insert the word “to” after “submitted”.

Puget Sound Clean Air Agency Response:

Change made.

22. Page 56, V.O.2 Certification of Reports (semiannual), citation at the end: Delete PSD citation at end: “PSD Permit 04-02, approval condition 12 (9/8/04).” . Kenworth does not have a PSD permit.

Puget Sound Clean Air Agency Response:

Change made.

23. Page 57, V.O.5, Name of Report, first row: For clarification please insert the word “only” before “when.”

Puget Sound Clean Air Agency Response:

Change made.

24. Page 57, V.O.5, Due date(s), first row: Please delete the word “~~occurs~~” and replace with “is discovered”. V.Q.1 requires reporting after a deviation is “discovered”.

Puget Sound Clean Air Agency Response:

Change made.

25. Page 62, last row of IEUs: Please add an end parenthesis after the “a”. The citation will read WAC 173-401-533(2)(a).

Puget Sound Clean Air Agency Response:

Change made.

26. Page 70, §VIII, 40 CFR Part 64: Please delete the last sentence in the description “~~See attached calculation of PTE without control.~~” because it is not attached to the AOP. (Alternatively, attach the calculation.)

Puget Sound Clean Air Agency Response:

Change made.

27. Page 72, 40 CFR Part 60 Subpart K, Ka, and Kb Description: Add a period at the end of the description.

Puget Sound Clean Air Agency Response:

Change made.

28. Page 73, VIII: Kenworth Renton requests that condition 5 of NOC 6074, dated 8/8/2003 be listed as an inapplicable requirement. Kenworth Renton considers condition 5 as obsolete. (Note that the condition has not been included in this renewal AOP and therefore Kenworth Renton assumes that PSCAA also considers the condition obsolete). The basis for inapplicability follows. 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.

Puget Sound Clean Air Agency Response:

Change made.

29. Page 73, IX.A.1 and 2: Please include the latest versions of Methods 5 and 9A in the permit.

Puget Sound Clean Air Agency Response:

The latest versions of these non-EPA test methods will be included as an Appendix to the AOP.

B. Comments on the SOB by Kenworth Trucking Company, with responses by Puget Sound Clean Air Agency

1. Page 2, II.A, second paragraph on Page 2: Change: "...discharges pretreated wastewater to the sanitary sewer under a ~~Metro~~ King County Industrial Waste Program pre-treatment permit."

Puget Sound Clean Air Agency Response:

Change made.

2. Page 9, VI.A.1(b), second paragraph, last sentence: Correct typo Ttherefore.

Puget Sound Clean Air Agency Response:

Change made.

3. Page 16, VI.A.1(h), second paragraph on Page 16: Change "V.S" to "V.R" and change "V.T" to "V.S".

Puget Sound Clean Air Agency Response:

Change made.

4. Page 17, first paragraph on page: Delete this paragraph. It discusses Order of Approval No. 6977 (issued on October 21, 1997) which was superseded by Order of Approval 6074, amended on August 8, 2003 (which the previous paragraph on page 16 correctly notes).

Puget Sound Clean Air Agency Response:

Change made.

5. Page 17, §VI.A.2(a) EU-1 Assembly Operations: Highway And Off-Highway Trucks 1st paragraph:

Reg. II §3.04(a) no longer refers to Group I vehicles. Delete the reference to "~~Group I~~."

Same comment: Page 18, §(d), 1st paragraph; Page 20, §(e), 1st paragraph; Page 21, §(f), 1st paragraph, Page 23, §(g), 1st and 2nd paragraph.

Puget Sound Clean Air Agency Response:

Changes made.

6. Page 18, VI.A.2(c): Remove the one quote mark at the end of the fourth sentence.

Puget Sound Clean Air Agency Response:

Change made.

7. Page 26, VII, first paragraph: Change “~~V.Q.2~~” to “V.Q.1”.

Puget Sound Clean Air Agency Response:

Change made.

8. Page 36, II.A.2(g) discussion: Please delete the word “~~not~~” in the last sentence. The sentence will then read: The Puget Sound Clean Air Agency has made the requested change.” Condition II.A.2(g) of the permit does state that the inspection frequency will be quarterly. Also see the relevant discussion on page 10 (second paragraph of Technical considerations) of the Statement of Basis where it states that the inspection interval for the dust collectors is quarterly.

Puget Sound Clean Air Agency Response:

Change made.

Administrative Amendment I

On May 13, 2008, we received a \$250 payment for an administrative modification. The request was to change the Responsible Official to Reid Nabarrete and to update the FAX number to (425) 227-5853

Puget Sound Clean Air Agency Response:

Change made.