

Clark
Cowlitz
Lewis
Skamania
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Southwest Clean Air Agency

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June 17, 2008

Brian Harris, Environmental and Safety Officer
Christensen Shipbuilding, Ltd.
4400 SE Columbia Way
Vancouver, WA 98661

RE: Final Air Discharge Permit for Installation of New Heated Make-Up Air Unit

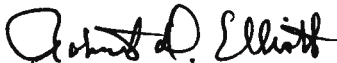
Dear Mr. Harris:

The public comment period for the preliminary determination to issue Air Discharge Permit (ADP) 08-2788 concluded on June 16, 2008. The Southwest Clean Air Agency (SWCAA) did not receive any adverse comment from the public relative to the preliminary determination. Therefore, a final determination to issue ADP 08-2788 has been made pursuant to Section 400-110(4) of SWCAA's General Regulations for Air Pollution Sources. Electronic copies of ADP 08-2788 and the associated Technical Support Document are available for public review in the permit section of SWCAA's webpage (<http://www.swcleanair.org/permitsfinal.html>). Original copies are enclosed for your files.

ADP 08-2788 may be appealed directly to the Pollution Control Hearings Board (PCHB) at P.O. Box 40903, Olympia, Washington 98504-0903 within thirty (30) days of receipt as provided in Revised Code of Washington (RCW) 43.21B.

If you have any comments or need additional information, please contact me or John St.Clair at (360) 574-3058, extension 27.

Sincerely,



Robert D. Elliott
Executive Director

RDE:jts

Enclosure: Final Technical Support Document and Air Discharge Permit 08-2788

Cc: Nancy Helm, Manager; Federal & Delegated Air Programs Unit; 1200 Sixth Avenue,
MS AWT-107; Seattle, WA 98101



SOUTHWEST CLEAN AIR AGENCY

AIR DISCHARGE PERMIT
08-2788

Final Date: June 17, 2008

Facility Name: Christensen Shipyards, Ltd.
Physical Location: 4400 SE Columbia Way
Vancouver, WA 98661

SWCAA ID: 1168



REVIEWED BY: Paul T. Mairose
Paul T. Mairose, Chief Engineer

EXPIRES 08-4-2008

APPROVED BY: Robert D. Elliott
Robert D. Elliott, Executive Director

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1. Equipment/Activity Identification

ID No.	Equipment/Activity	# of Units	Control Equipment	# of Units
1	Construction Bay	1	Fabric Filtration	3
2	Finishing Bay	1	Fabric Filtration	3
3	New Addition Bay	1	Fabric Filtration	2
4	Chemical Storage Room	1	Fabric Filtration	1
5	Metal Shop Spray Booth with Heated Makeup Air Unit	1	Fabric Filtration, HVLP guns, and Low-sulfur fuel (natural gas)	N/A
6	JB I Spray Booth, model SDISD26PSB-1	1	Fabric Filtration and HVLP guns	N/A
7	JB I Spray Booth, model SD26PSB-1	1	Fabric Filtration and HVLP guns	N/A
8	Upholstery Shop Spray Booth	1	Fabric Filtration and HVLP guns	N/A
9	RBI water heater, 0.399 MMBtu/hr, model DB400	2	Low-sulfur fuel (natural gas) and Low-NO _x burners	N/A

2. Approval Conditions

The following tables detail the specific conditions of this permit. In addition to the conditions listed below, equipment at this facility may be subject to other federal, state, and local regulations. The permit condition number is identified in the left hand column. The text of the permit condition is contained in the middle column. The emission unit, equipment, or activity to which the permit condition applies is listed in the right hand column.

This Permit supersedes Air Discharge Permit (ADP) 06-2693 in its entirety.

2.1. Emission Limits

No.	Emission Limit	Equipment/Activity						
1.	<p>VOC and styrene emissions from yacht manufacturing activities, including fiberglass lay-up and surface coating, shall not exceed the following, as a 12-month rolling total summed monthly:</p> <table border="0" style="margin-left: auto; margin-right: auto;"> <tr> <td style="text-align: center;"><u>Pollutant</u></td> <td style="text-align: center;"><u>Emission Limit</u></td> </tr> <tr> <td style="text-align: center;">VOC</td> <td style="text-align: center;">50.0 tpy</td> </tr> <tr> <td style="text-align: center;">styrene</td> <td style="text-align: center;">9.9 tpy</td> </tr> </table> <p>All emissions shall be determined consistent with Section 6 of the Technical Support Document for this ADP.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	VOC	50.0 tpy	styrene	9.9 tpy	1-8
<u>Pollutant</u>	<u>Emission Limit</u>							
VOC	50.0 tpy							
styrene	9.9 tpy							

No.	Emission Limit	Equipment/ Activity						
2.	Emissions of individual TAPs and HAPs shall not exceed the more stringent of the following: a) The respective Small Quantity Emission Rate listed in WAC 173-460 as a 12-month rolling total summed monthly, except for styrene, unless it can be demonstrated that the emissions are below the respective Acceptable Source Impact Level listed in WAC 173-460; or b) 10.0 tpy as a 12-month rolling total summed monthly for TAPs that are also listed HAPs, except for styrene.	1-8						
3.	Emissions of all HAPs combined shall not exceed 25.0 tpy as a 12-month rolling total summed monthly.	1-8						
4.	Emissions of TAPs and HAPs, including styrene, shall not collectively cause the VOC emission limit to be exceeded.	1-8						
5.	<p>PM₁₀ emissions from surface coating operations performed inside approved spray booths shall not exceed the following, as a 12-month rolling total summed monthly:</p> <table border="0" data-bbox="358 852 769 926"> <thead> <tr> <th data-bbox="358 852 492 884"><u>Pollutant</u></th> <th data-bbox="558 852 769 884"><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="402 890 475 921">PM₁₀</td> <td data-bbox="618 890 708 921">1.0 tpy</td> </tr> </tbody> </table> <p>Emissions shall be determined consistent with Section 6 of the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	PM ₁₀	1.0 tpy	5-8		
<u>Pollutant</u>	<u>Emission Limit</u>							
PM ₁₀	1.0 tpy							
6.	<p>Emissions of criteria pollutants from the hot water heaters and the heated make-up air unit, combined, shall not exceed the following as a 12-month rolling total summed monthly:</p> <table border="0" data-bbox="358 1192 769 1299"> <thead> <tr> <th data-bbox="358 1192 492 1224"><u>Pollutant</u></th> <th data-bbox="558 1192 769 1224"><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="407 1230 475 1262">NO_x</td> <td data-bbox="610 1230 716 1262">0.60 tpy</td> </tr> <tr> <td data-bbox="412 1268 464 1299">CO</td> <td data-bbox="610 1268 716 1299">0.11 tpy</td> </tr> </tbody> </table> <p>Emissions shall be determined consistent with Section 6 of the Technical Support Document for this Permit.</p>	<u>Pollutant</u>	<u>Emission Limit</u>	NO _x	0.60 tpy	CO	0.11 tpy	9
<u>Pollutant</u>	<u>Emission Limit</u>							
NO _x	0.60 tpy							
CO	0.11 tpy							
7.	Visible emissions from any emission point shall not exceed zero percent (0%) opacity for more than three (3) minutes in any one hour period determined in accordance with SWCAA Method 9.	1-9						

2.2. Operating Limits and Requirements

No.	Operating Limit or Requirement	Equipment/ Activity
8.	All containers of VOC-containing products shall be kept securely closed except when materials are being added, mixed, or removed. All spent or used VOC-containing products that are used to clean and flush spray equipment, spray lines, tools or other equipment shall be collected into a closed container and securely closed.	1-8

No.	Operating Limit or Requirement	Equipment/ Activity
9.	All surface coating that can physically be performed inside a spray booth shall be performed in an approved spray booth. Surface coating that cannot be done in an approved spray booth shall only take place in the Finishing Bay.	1-8
10.	Surface coating, fiberglass lay-up, and surface finishing performed in the Construction Bay, Finishing Bay, and the New Addition Bay shall only be performed when the fabric filters are in place and with the doors closed, except when moving products into or out of the Bays.	1-3
11.	All surface coating shall be performed with high transfer efficiency ($\geq 65\%$) equipment, such as HVLP spray guns, electrostatic application, airless spray guns, or air assisted airless spray guns.	1-8
12.	Air cap pressure for each HVLP spray gun applying a coating, such as a paint, stain, or resin, shall have a maximum cap pressure of 10 psi as measured by an air cap pressure gauge. The Permittee shall have an air cap pressure gauge available to periodically check the air cap pressure.	1-8
13.	Any device that obstructs or prevents vertical discharge from any stack or vent, such as a rain cap, is prohibited.	4-9
14.	Exhaust from the two JBI spray booths shall be discharged vertically into the ambient air with a minimum stack height of six (6) feet above roof level.	6 and 7
15.	The JBI spray booth filters shall be replaced prior to exceeding the filter manufacturer's recommended differential pressure drop, as measured by the booth differential pressure gauge.	6 and 7
16.	A differential pressure gauge shall be installed and maintained on each spray booth to measure differential pressure across the exhaust filter media.	5-8
17.	The Sternvent and MAC baghouses shall only exhaust internally into the building. Exhausting to ambient air shall be prohibited under normal operation of the baghouses.	Facilitywide
18.	A differential pressure gauge shall be installed and maintained on the MAC baghouse to measure differential pressure across the exhaust filter media.	Facilitywide
19.	Reasonable precautions shall be taken at all times to prevent and minimize fugitive emissions from facility operations.	Facilitywide
20.	Recognized good practice and procedures shall be used to reduce emissions to the ambient air that cause or contribute to a nuisance odor and that may unreasonably interfere with any other property owner's use and enjoyment of his property.	Facilitywide
21.	Emission units identified in this Permit shall be maintained and operated in total and continuous conformity with the emission levels and operational requirements specified in this Permit. SWCAA reserves the right to take any and all appropriate action to maintain the conditions of this Permit, including directing the facility to cease operations until corrective action can be completed.	1-9
22.	Each pollution control device shall be operated whenever the processing equipment served by that control device is in operation. Control devices shall be operated and maintained in accordance with the manufacturer's specifications. Furthermore, control devices shall be operated in a manner that minimizes emissions.	1-9

2.5. Reporting Requirements

No.	Reporting Requirement	Equipment/ Activity
31.	<p>A written annual, January through December, emissions inventory report shall be submitted to SWCAA by March 15 of each year for the previous calendar year in accordance with SWCAA 400-105(1). The report shall include the following:</p> <ol style="list-style-type: none"> The annual sum of emissions of criteria pollutants, TAPs, and HAPs; The annual sum of product usage (gallons or lb) for each product containing VOCs, TAPs, or HAPs; The annual sum of solvent recycled; The annual sum of paint waste disposed; The hours of MAC baghouse bypass; The annual hours of operation of the facility; and The amount of natural gas burned in the hot water heaters and in the heated make-up air unit. 	1-9
32.	<p>A written monthly report shall be submitted to SWCAA by the last day of the following month (for example, the January report is due by the last day of February). The report shall include the following:</p> <ol style="list-style-type: none"> The rolling twelve (12) month sum of VOCs, TAPs, and HAPs emissions; The rolling twelve (12) month sum of product usage for all VOC, TAP, and HAP containing products; The monthly sum of solvent recycled; and The monthly sum of paint waste disposed. 	1-8
33.	<p>A written report shall be submitted to SWCAA at least seven (7) business days prior to the use of any new product that contains VOCs or TAPs. The report shall contain the following:</p> <ol style="list-style-type: none"> A description of the type of product (e.g. resin, paint, spray paint, solvent, etc.), the Material Safety and Data Sheet (MSDS), and the location where the product will be used (e.g. paint booth, finishing bay, etc.); The date by which the Permittee intends to begin use of the product; The annual amount (gallons or lb) expected to be used; If the product is a replacement for an existing product, the report shall state the name of the replaced product; and The increase or decrease in the amount of VOC, HAP and TAP emissions from the use of the product. <p>If the new product would cause any emission limit to be exceeded, the Permittee shall submit an ADP application to SWCAA to request a permit revision to this Permit. The Permittee shall not begin using the new product until a revised permit is issued.</p> <p>Any new product that is only to be used for testing purposes with a quantity of five (5) gallons or less of usage does not need to be reported to SWCAA prior to use.</p>	1-8

No.	Reporting Requirement	Equipment/ Activity
34.	Upset conditions that may result in excess emissions shall be reported to SWCAA as soon as possible after discovery. The Permittee may provide notification to SWCAA via telephone. A message may be left on the answering machine for upset conditions that occur outside of normal business hours.	Facilitywide
35.	<p>Excess emissions shall be reported to SWCAA as follows:</p> <ul style="list-style-type: none"> • As soon as possible, but no later than twelve (12) hours after discovery for emissions that represent a potential threat to human health or safety; • As soon as possible, but no later than forty-eight (48) hours after discovery for emissions which the permittee wishes to claim as unavoidable pursuant to SWCAA 400-107(1); and • No later than thirty (30) days after the end of the month of discovery for all other excess emissions. 	Facilitywide
36.	A written notification of the initial start-up of the heated make-up air unit shall be reported to SWCAA within ten (10) days of the initial start-up.	5

3. General Provisions

No.	General Provisions
A.	For the purpose of ensuring compliance with this ADP, duly authorized representatives of the Southwest Clean Air Agency shall be permitted access to the Permittee's premises and the facilities being constructed, owned, operated and/or maintained by the permittee for the purpose of inspecting said facilities. These inspections are required to determine the status of compliance with this ADP and applicable regulations and to perform or require such tests as may be deemed necessary.
B.	The provisions, terms and conditions of this ADP shall be deemed to bind the Permittee, its officers, directors, agents, servants, employees, successors and assigns, and all persons, firms, and corporations acting under or for the Permittee.
C.	The requirements of this ADP shall survive any transfer of ownership of the source or any portion thereof.
D.	This ADP shall be posted conspicuously at or be readily available near the source.
E.	This ADP shall be invalid if construction or installation of any new or modified equipment has not commenced within eighteen (18) months from date of issuance, if construction is discontinued for a period of eighteen (18) months or more, or if construction is not completed within a reasonable time.
F.	This ADP does not supersede requirements of other Agencies with jurisdiction and further, this ADP does not relieve the Permittee of any requirements of any other governmental Agency. In addition to this ADP, the Permittee may be required to obtain permits or approvals from other agencies with jurisdiction.
G.	Compliance with the terms of this ADP does not relieve the Permittee from the responsibility of compliance with SWCAA General Regulations for Air Pollution Sources, previously issued Regulatory Orders, RCW 70.94, Title 173 WAC or any other applicable emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply.

No.	General Provisions
H.	If any provision of this ADP is held to be invalid, all unaffected provisions of the ADP shall remain in effect and be enforceable.
I.	No change in this ADP shall be made or be effective except as may be specifically set forth by written order of the Southwest Clean Air Agency upon written application by the Permittee for the relief sought.
J.	The Southwest Clean Air Agency may, in accordance with RCW 70.94 impose such conditions as are reasonably necessary to assure the maintenance of compliance with the terms of this ADP, the Washington Clean Air Act, and the applicable rules and regulations adopted under the Washington Clean Air Act.