

Air Operating Permit
SW97-2-R1

Attbar, Inc.

Southwest Clean Air Agency
11815 NE 99th St, Suite 1294
Vancouver, WA 98682-2322
Telephone: (360) 574-3058

AIR OPERATING PERMIT #:

SW97-2-R1

ISSUED TO: Attbar, Inc.
5985 S 6th Way
Ridgefield, WA 98642

PLANT SITE: Attbar, Inc.
5985 S 6th Way
Ridgefield, WA 98642

NATURE OF BUSINESS:

Fiberglass Products Manufacturing

SIC CODE:

3089

AIRS NUMBER:

53-011-00143

EFFECTIVE DATE:

December 12, 2007

EXPIRATION DATE:

December 12, 2012

PERMIT ENGINEER:

John St.Clair, Air Quality Engineer

Date

Paul T. Mairose, Chief Engineer

Date

Robert D. Elliott, Executive Director

Date

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I. ACRONYMS AND ABBREVIATIONS

List of Common Abbreviations

ADP	Air Discharge Permit	PM ₁₀	PM with an aerodynamic diameter $\leq 10 \mu\text{m}$ (includes both filterable PM measured by EPA Method 201 or 201A and condensable PM measured by EPA Method 202)
AOP	Air Operating Permit	PM _{2.5}	PM with an aerodynamic diameter $\leq 2.5 \mu\text{m}$ (includes both filterable PM measured by EPA Method 201 or 201A and condensable PM measured by EPA Method 202)
AP-42	EPA. "AP-42, <i>Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources.</i> " Fifth Edition.	ppm	Parts per million
ASHRAE	American Society of Heating, Refrigeration and Air Conditioning Engineers	ppm _v	Parts per million by volume
BACT	Best Available Control Technology	ppm _{v,d}	Parts per million by volume, dry
CFR	Code of Federal Regulations	psi	Pounds per square inch
CO	Carbon Monoxide	RACT	Reasonably Available Control Technology
EPA	U.S. Environmental Protection Agency	RCW	Revised Code of Washington
FCAA	Federal Clean Air Act	RTM	Resin Transfer Molding
FRP	Fiberglass Reinforced Product	SIP	State Implementation Plan
gr/dscf	Grains per dry standard cubic foot (68°F, 1 atmosphere)	SQER	Small Quantity Emission Rate listed in WAC 173-460
HAP	Hazardous Air Pollutant	SO ₂	Sulfur Dioxide
HVLP	High-volume, Low-Pressure (spray gun)	SWCAA	Southwest Clean Air Agency
MACT	Maximum Achievable Control Technology	TAP	Toxic Air Pollutant pursuant to WAC 173-460
MSDS	Material Safety Data Sheet	tpy	Tons per year
NO _x	Nitrogen Oxides	VOC	Volatile Organic Compound
O & M	Operation and Maintenance	WAC	Washington Administrative Code
OSHA	Occupational and Safety Health Administration		
PM	Particulate Matter with an aerodynamic diameter less than 100 μm (includes both filterable PM measured by EPA Method 5 and condensable PM measured by EPA Method 202)		

Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations.

II. REGULATORY BASIS

This Air Operating Permit (AOP) is authorized under the procedures established in WAC 173-401 and Title V of the 1990 Federal Clean Air Act (FCAA) Amendments. The terms and conditions of this permit describe the emissions limitations, operating requirements, ambient monitoring, recordkeeping requirements, and reporting frequencies for the permitted source.

Permit terms and conditions are classified into three categories: General Terms and Conditions, Plantwide Emission Standards/Limits, and Emissions Unit Emission Standards/Limits. As used in this permit, there is no distinction between "terms" and "conditions". As such, "condition" shall mean the same as "terms and conditions" as referred to in Title V of the 1990 FCAA Amendments.

The conditions required under this permit are determined necessary to assure and provide for certification of compliance with applicable local, state, and federal air pollution regulations and standards. A comprehensive list of local, state, and federal air pollution regulations and standards that currently apply to emissions units and other air pollution sources located at the Permittee's facility is provided in **Section VI – Applicable Requirements**. These regulations and standards were determined applicable based on the equipment specifications and regulatory history of each emissions unit as described in the Statement of Basis for this permit.

III. EMISSION UNIT IDENTIFICATION

Emissions Unit	Unit Name	Unit Description
EU1	Lamination Shop	Fiberglass components are produced and/or repaired using reinforcement materials and thermosetting resins. Methods used to produce fiberglass reinforced products include gelcoating, hand lay-up, spray-up, chop spray-up, surface coating, and post curing. Two natural gas heaters are used to heat make-up air for the production shop.
EU2	Mold Fabrication	Production molds are produced on-site from patterns supplied by customers. Molds are constructed by applying gelcoat and laminate to the patterns. Upon curing, molds are removed from patterns, and used in the production shop

IV. PERMIT PROVISIONS**P1. Credible Evidence**

40 CFR 51.12 – 7/1/2006
40 CFR 51.212 – 7/1/2006
40 CFR 52.33 – 7/1/2006
40 CFR 60.11 – 7/1/2006
40 CFR 61.12 – 7/1/2006

For the purposes of submitting compliance certifications or establishing whether a violation of any term or condition of this permit has occurred or is occurring, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether the Permittee would have been in compliance with a specific term or condition if the appropriate performance or compliance test or procedure would have been performed.

P2. Confidentiality of Records and Information

WAC 173-401-500(5) – 10/17/2002
WAC 173-401-620(2)(e) – 11/4/1993

SWCAA 400-270 – 9/21/1995 SIP, 12/14/2006 Local Only

The Permittee is responsible for clearly identifying information that is considered proprietary and confidential prior to submittal to SWCAA. Requests for proprietary and confidential information shall be released only after legal opinion by SWCAA's legal counsel, and notice to the Permittee of the intent to release or deny the release of information [SWCAA 400-270].

In the case where the Permittee has submitted information to SWCAA under a claim of confidentiality, SWCAA may also require the source to submit a copy of such information directly to the Administrator [WAC 173-401-500(5)].

Upon request, the Permittee shall also furnish to the permitting authority copies of records required to be kept by the Permittee or, for information claimed to be confidential, the Permittee may furnish such records directly to the Administrator along with a claim of confidentiality. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70.94.205 [WAC 173-620(2)(e)].

P3. Permit Duration

WAC 173-401-610 – 11/4/1993

This permit shall be valid for a fixed term of five (5) years.

P4. Standard Conditions

WAC 173-401-620(2) – 11/4/1993

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- a. *Duty to comply.* The Permittee must comply with all conditions of this chapter 401 permit. Any permit noncompliance constitutes a violation of Revised Code of Washington (RCW) Chapter 70.94 and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
 - b. *Need to halt or reduce activity not a defense.* It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

- c. *Permit actions.* This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- d. *Property rights.* This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. *Duty to provide information.* The Permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the Administrator along with a claim of confidentiality. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70.94.205.
- f. *Permit fees.* The Permittee shall pay fees as a condition of this permit in accordance with the permitting authority's fee schedule. Failure to pay fees in a timely fashion shall subject the Permittee to civil and criminal penalties as prescribed in RCW 70.94.430 and 70.94.431.
- g. *Emissions trading.* No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
- h. *Severability.* If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable.
- i. *Permit appeals.* This permit or any conditions in it may be appealed only by filing an appeal with the Pollution Control Hearings Board and serving it on the permitting authority within thirty (30) days of receipt pursuant to RCW 43.21B.310. This provision for appeal in this section is separate from and additional to any federal rights to petition and review under FCAA §505(b).
- j. *Permit continuation.* This permit and all terms and conditions contained therein shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect until the renewal permit has been issued or denied if a timely and complete application has been submitted.

P5. Insignificant Emission Unit – Permit Revision WAC 173-401-530(6) – 10/17/2002

Any emission unit or activity that qualifies as insignificant solely on the basis of provisions in WAC 173-401-530(1)(a) shall not exceed the emissions thresholds specified in WAC 173-401-530(4) until this permit is modified pursuant to WAC 173-401-725.

P6. Federally Enforceable Requirements WAC 173-401-625 – 11/4/1993

- a. All terms and conditions in an air operating permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the FCAA.
- b. Any terms and conditions included in this permit that are not required under the FCAA or under any of its applicable requirements are specifically designated as "state" or "local" only, and are not federally enforceable under the FCAA. Terms and conditions so designated are not subject to the requirements of WAC 173-401-810.

P7. Permit Shield**WAC 173-401-640 – 11/4/1993**

Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements that are specifically identified in this permit as of the date of permit issuance. Nothing in this permit shall alter or affect the following:

- a. The provisions of FCAA §303 (emergency orders), including the authority of the Administrator under that section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program, consistent with FCAA §408(a);
- d. The ability of EPA to obtain information from a source pursuant to FCAA §114; and
- e. The ability of the permitting authority to establish or revise requirements for the use of reasonably available control technology (RACT) as defined in RCW 70.94.030(19).

P8. Emergency Provision**WAC 173-401-645 – 11/4/1993**

An "emergency" as defined in WAC 173-401-645(1) shall constitute an affirmative defense to an action brought for noncompliance with technology based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- a. An emergency occurred and that the Permittee can identify the causes(s) of the emergency;
- b. The permitted facility was at the time being properly operated;
- c. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- d. The Permittee submitted notice of the emergency to the permitting authority within two working days of the time when emission limitations were exceeded due to the emergency or shorter periods of time specified in an applicable requirement. This notice fulfills the requirement of WAC 173-401-615(3)(b) unless the excess emissions represent a potential threat to human health and safety. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

Burden of proof lies with the Permittee.

P9. Reopenings for Cause**WAC 173-401-730 – 11/4/1993**

This permit shall be reopened and revised under any of the following circumstances:

- a. Additional applicable requirements become applicable to a major air operating permit source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620 (2)(j);

- b. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit;
- c. The permitting authority or Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
- d. The Administrator or the permitting authority determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings under this section shall not be initiated before a notice of such intent is provided to the air operating permit source by the permitting authority at least thirty (30) days in advance of the date that the permit is to be reopened, except that the permitting authority may provide a shorter time period in the case of an emergency.

P10. Excess Emissions

WAC 173-400-107 – 9/20/1993

SWCAA 400-107 – 9/21/1995 SIP, 12/16/2005 Local Only

The Permittee shall report excess emissions to SWCAA as soon as possible. Excess emissions due to startup or shutdown conditions or due to scheduled maintenance shall be considered unavoidable provided the source reports as required under SWCAA 400-107(1) and adequately demonstrates that the excess emissions could not have been prevented or avoided.

Excess emissions due to upsets shall be considered unavoidable provided that the Permittee reports as soon as possible but no later than forty-eight (48) hours after discovery, and adequately demonstrates that:

- a. The event was not caused by poor or inadequate design, operation, or maintenance, or any other reasonably preventable conditions;
- b. The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance;
- c. The operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded; and
- d. The owner or operator(s) actions in response to the excess emissions were documented by properly signed, contemporaneous operating logs, or other relevant evidence.

G15. Excess Emissions

WAC 173-401-615(3)(b) – 10/17/02

WAC 173-400-107 – 9/20/1993 SIP, 9/20/1993 State Only

SWCAA 400-107 – 9/21/95 SIP, 12/14/2006 State Only

The Permittee shall report excess emissions to SWCAA as soon as possible. Excess emissions due to startup or shutdown conditions or due to scheduled maintenance shall be considered unavoidable provided the source reports as required under SWCAA 400-107(1) and adequately demonstrates that the excess emissions could not have been prevented or avoided.

Excess emissions due to upsets shall be considered unavoidable provided that the Permittee reports as soon as possible but no later than 48 hours after discovery, and adequately demonstrates that:

- a. The event was not caused by poor or inadequate design, operation, or maintenance, or any other reasonably preventable conditions;
- b. The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance;
- c. The operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded; and
- d. The owner or operator actions in response to the excess emissions were documented by properly signed, contemporaneous operating logs, or other relevant evidence.

V. GENERAL TERMS AND CONDITIONS

G1. Asbestos

40 CFR 61 Subpart M – 6/19/1995
WAC 173-400-075 – 6/8/2007 State Only
SWCAA 400-075 – 12/14/2006 Local Only
SWCAA 476 – 3/18/2001 Local Only

The Permittee shall comply with the provisions of SWCAA 476 when conducting any renovation or demolition activities at the facility.

G2. Chemical Accident Prevention

40 CFR 68 – 6/20/1996

The Permittee shall comply with the requirements of the Chemical Accident Prevention Provisions of 40 CFR 68 no later than the following dates:

- a. Three years after the date on which a regulated substance, present above the threshold quantity, is first listed under 40 CFR 61.130; or
- b. The date on which a regulated substance is first present above a threshold quantity in a process under 40 CFR 68.10.

G3. Protection of Stratospheric Ozone

40 CFR 82.30 – 7/14/1992
40 CFR 82.150 – 5/14/1993

The Permittee shall comply with the standards for recycling and emissions reduction as provided in 40 CFR 82 Subpart B (§82.30) and Subpart F (§82.150).

G4. Duty to Supplement or Correct Application

WAC 173-401-500(6) – 10/17/2002

The Permittee, upon becoming aware that relevant facts were omitted or incorrect information was submitted in a permit application, shall promptly submit such supplementary facts or corrected information. In addition, an applicant shall provide additional information as necessary to address

any requirements that become applicable to the source after the date it filed a complete application but prior to release of a draft permit.

G5. Certification **WAC 173-401-520 – 11/4/1993**

All application forms, reports, and compliance certifications must be certified by a responsible official. Certification shall state that, based on information and belief formed after reasonable inquiry, the statements, and information contained in the submittal are true, accurate, and complete.

G6. Inspection and Entry **WAC 173-401-630(2) – 11/4/1993**
WAC 173-400-105(3) and (4) – 9/20/1993 SIP, 6/8/2007 State Only
SWCAA 400-105(3) – 9/21/1995 SIP, 12/14/2006 Local Only
SWCAA 400-106(1)(a) – 12/14/2006 Local Only

The Permittee shall allow inspection and entry, upon presentation of credentials and other documents as may be required by law, by the permitting authority or an authorized representative to perform the following:

- a. Enter upon the Permittee's premises where an air operating permit source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- d. As authorized by SWCAA 400-105 and the FCAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

G7. Schedule of Compliance **WAC 173-401-630(3) – 11/4/1993**

The Permittee shall continue to comply with all applicable requirements with which the source is currently in compliance. The Permittee shall meet on a timely basis any applicable requirements that become effective during the permit term.

G8. Permit Renewal, Expiration, and Revocation **WAC 173-401-710 – 10/17/2002**

The Permittee shall submit a complete permit renewal application to SWCAA no later than the date established in the permit. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with WAC 173-401-710(1) and WAC 173-401-500. All terms and conditions of the permit shall remain in effect after the permit expires if a timely and complete permit application has been submitted. Operation under the terms and conditions of the expired permit will be allowed until SWCAA takes final action on the renewal application.

This permit expires on **December 12, 2012**. A renewal application is due on **December 12, 2011** and a *complete* renewal application is due no later than **June 12, 2012**.

The permitting authority may revoke a permit only upon the request of the Permittee or for cause. The permitting authority shall provide at least thirty (30) days written notice to the Permittee prior to revocation of the permit or denial of a permit renewal application. Such notice shall include an explanation of the basis for the proposed action and afford the Permittee an opportunity to meet with the permitting authority prior to the authority's final decision. A revocation issued under this section may be issued conditionally with a future effective date and may specify that the revocation will not take effect if the Permittee satisfies the specified conditions before the effective date.

G9. Transfer of Ownership or Operational Control WAC 173-401-720(1)(d) – 11/4/1993

A change in Permittee due to transfer of ownership or operational control of an affected source requires a request for administrative permit amendment as governed by WAC 173-401-720.

G10. Portable Sources

**WAC 173-400-110(5) – 6/2/1995 SIP
WAC 173-400-035 – 10/7/2007 State Only
SWCAA 400-110(5) – 11/21/1996 SIP
SWCAA 400-110(6) – 12/14/2006 Local Only**

Portable sources which locate temporarily at the site of air operating permit sources shall be allowed to operate at the temporary location without filing an Air Discharge Permit (ADP) application for each location provided that:

- a. The source/emissions units are registered with SWCAA;
- b. The source/emissions units have an ADP as a portable source;
- c. The owner or operator notifies SWCAA of intent to operate at the new location at least ten (10) business days prior to starting the operation;
- d. The owner or operator supplies sufficient information including production quantities and hours of operation, to enable SWCAA to determine that the operation will comply with the emission standards for a new source, and will not cause a violation of applicable ambient air quality standards and, if in a nonattainment area, will not interfere with scheduled attainment of ambient standards; and
- e. The owner and/or resident of immediately adjacent properties shall be notified by the owner or operator of the portable source in writing at least ten (10) business days prior to commencement of operations at the proposed location with copies mailed to SWCAA. Written notification to the adjacent landowners/residents shall be by certified mail with return receipt requested. Such written notification shall include a complete description of the proposed operation, the associated emissions control provisions and equipment, the total estimated project emissions, the name, address and phone number of the person in charge of the operation, and the address and phone number for SWCAA. Written notification shall indicate that all comments shall be directed to SWCAA.

G11. Misrepresentation and Tampering

**WAC 173-400-105(7) and (8) – 9/20/1993 SIP, 2/10/2005 State Only
SWCAA 400-105(6) and (7) – 9/21/1995 SIP, 12/14/2006 Local Only**

The Permittee shall not make any false material statement, representation or certification in any form, notice, or report required under Chapter 70.94 or 70.120 RCW, or any ordinance, resolution,

regulation, permit, or order in force pursuant thereto. The Permittee shall not render inaccurate any monitoring device or method required under Chapter 70.94 or 70.120 RCW, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto.

G12. New Source Review **WAC 173-400-110 – 9/20/1993 SIP, 6/8/2007 State Only**
WAC 173-400-700 – 2/10/2005 State Only
WAC 173-460 – 8/21/1998 State Only
SWCAA 400-109 – 12/14/2006 Local Only
SWCAA 400-110 – 11/21/1996 SIP, 12/14/2006 Local Only
SWCAA 400-141 – 12/14/2006 Local Only

The Permittee shall not construct or modify a source which is required to be reviewed under SWCAA 400, WAC 173-400 or WAC 173-460 without first receiving an approval or permit under such provisions. Portable sources may be exempt from this requirement if they fulfill the criteria described in **G10 – Portable Sources**.

G13. Replacement or Substantial Alteration of Emission Control Technology at an Existing Stationary Source **WAC 173-400-114 – 9/15/2001 State Only**
SWCAA 400-114 – 11/21/1996 SIP, 12/14/2006 Local Only

Prior to replacing or substantially altering emission control technology or equipment installed at an existing stationary source or emission unit, the Permittee shall file an air discharge permit application with SWCAA. Construction shall not commence on a project subject to review until SWCAA issues a final air discharge permit or other regulatory order. However, any air discharge permit application filed under this section shall be deemed to be approved without conditions if the Agency takes no action within thirty (30) days of receipt of a complete application.

G14. Outdoor Burning **WAC 173-425 – 10/18/1990 SIP, 4/13/2000 State Only**
SWCAA 425 – 8/1/2002 Local Only

The Permittee is prohibited from conducting open burning except as allowed by SWCAA 425.

VI. APPLICABLE REQUIREMENTS

The following table lists all federal, state, and/or locally enforceable requirements applicable to the Permittee. The legal authority for each requirement is enclosed in brackets below each requirement. Applicable requirements identified as having "plantwide" applicability apply to both EUs and insignificant emission units (IEUs). Some of the requirements have been partially adopted into the Washington State Implementation Plan (SIP). Only those parts adopted into the Washington SIP are federally enforceable. Requirements which are not required under the FCAA are denoted as state or local only. Monitoring requirements are used to provide a reasonable assurance of compliance with the applicable requirements, and may or may not involve the use of a reference test method. Short-term emissions shall be calculated from the average of three (3) one-hour test runs unless otherwise stated in the requirement or test method. Annual limits apply on a calendar year basis unless otherwise indicated.

Req. #	Applicable Requirements Facilitywide	Emission Point	Monitoring
Req-1	<p>Permittee shall not cause or permit any emission which exceeds 20% opacity for more than three (3) minutes, in any one-hour period.</p> <p>Reference Method: SWCAA Method 9</p> <p>WAC 173-400-040(1)(a) and (b) – 9/20/1993 SIP, 2/10/2005 State Only SWCAA 400-040(1)(a) and (b) – 9/21/1995 SIP, 12/14/2006 Local Only</p>	Plantwide	M1
Req-2	<p>Permittee shall not cause or permit fallout of PM beyond the source's property boundary in sufficient quantity to interfere unreasonably with use and enjoyment of the property on which the fallout occurs.</p> <p>WAC 173-400-040(2) – 2/10/2005 State Only SWCAA 400-040(2) – 12/14/2006 Local Only</p>	Plantwide	M2 M3
Req-3	<p>Permittee shall take reasonable precautions to prevent the release of fugitive emissions from any emissions unit which is a source of fugitive emissions.</p> <p>WAC 173-400-040(3)(a) – 9/20/1993 SIP, 2/10/2005 State Only SWCAA 400-040(3)(a) – 9/21/1995 SIP, 12/14/2006 Local Only</p>	Plantwide	M4
Req-4	<p>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.</p> <p>WAC 173-400-040(4) – 2/10/2005 State Only SWCAA 400-040(4) – 12/14/2006 Local Only ADP 07-2745 Condition 14 – 10/25/2007</p>	Plantwide	M2 M4
Req-5	<p>Permittee shall not cause or permit emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business</p> <p>WAC 173-400-040(5) – 9/20/1993 SIP, 2/10/2005 State Only SWCAA 400-040(5) – 9/21/1995 SIP, 12/14/2006 Local Only</p>	Plantwide	M3
Req-6	<p>Permittee shall not cause or permit any emissions unit to emit a gas containing an excess of 1,000 ppm_{v,d} SO₂, based on an average of sixty consecutive minutes.</p> <p>Reference Method: 40 CFR 60 Appendix A Method 6</p> <p>WAC 173-400-040(6) – 9/20/1993 SIP (except 2nd paragraph), 2/10/2005 State Only SWCAA 400-040(6) – 9/21/1995 SIP (except exception in 6(a)), 12/14/2006 Local Only</p>	Plantwide	M6

Req. #	Applicable Requirements Facilitywide	Emission Point	Monitoring
Req-7	<p>Permittee shall not cause or permit the installation or use of any means which conceals or masks an emission which would otherwise violate any provisions of SWCAA 400-040.</p> <p style="text-align: center;">40 CFR 63.4(b) – 4/5/2002 WAC 173-400-040(7) – 9/20/1993 SIP, 2/10/2005 State Only SWCAA 400-040(7) – 9/21/1995 SIP, 12/14/2006 Local Only</p>	Plantwide	N/A
Req-8	<p>Permittee shall take reasonable precautions to prevent emissions of fugitive dust and operate the source to minimize emissions.</p> <p style="text-align: center;">WAC 173-400-040(8)(a) – 9/20/1993 SIP, 2/10/2005 State Only SWCAA 400-040(8)(a) – 9/21/1995 SIP, 12/14/2006 Local Only</p>	Plantwide	M3 M4
Req-9	<p>Permittee shall not cause or permit emissions of PM from a combustion or incineration emissions unit in excess of 0.1 gr/dscf of exhaust gas corrected to 7% oxygen.</p> <p>Reference Method: 40 CFR 60 Appendix A Method 5</p> <p style="text-align: center;">WAC 173-400-050(1) and (3) – 9/20/1993 SIP (except the oxygen level exception in (3)), 2/10/2005 State Only SWCAA 400-050(1) and (3) – 9/21/1995 SIP (except the oxygen level exception in (3)), 12/14/2006 Local Only</p>	Plantwide	M2
Req-10	<p>Permittee shall not cause or permit emissions of PM from a general process unit (excluding combustion units) in excess of 0.1 gr/dscf of exhaust gas.</p> <p>Reference Method: 40 CFR 60 Appendix A Method 5</p> <p style="text-align: center;">WAC 173-400-060 – 9/20/1993 SIP, 2/10/2005 State Only SWCAA 400-060 – 9/21/1995 SIP, 12/14/2006 Local Only</p>	Plantwide	M2

Req. #	Applicable Requirements for Fiberglass Reinforced Product Manufacture and Boat Manufacture	Emission Point	Monitoring
Req-11	<p>Facilitywide emissions VOC, PM, styrene, and acetone from fiberglass reinforced product (FRP) and boat manufacture shall not exceed 98.1 tpy VOC, 85.3 tpy styrene, and 21.0 tpy acetone.</p> <p style="text-align: center;">ADP 07-2745 Condition 1 – 10/25/2007</p>	EU-1 EU-2	M8
Req-12	<p>TAP and HAP emissions to the ambient air shall be summed monthly over a rolling twelve (12) month period. Emissions of TAPs, except for styrene, shall not exceed the individual respective Small Quantity Emission Rate (SQER) provided in WAC 173-460.</p> <p style="text-align: center;">ADP 07-2745 Condition 2 – 10/25/2007</p>	EU1 EU2	M8

Req. #	Applicable Requirements for Fiberglass Reinforced Product Manufacture and Boat Manufacture	Emission Point	Monitoring
Req-13	<p>Permittee shall not cause or permit any emission which exceeds 0% opacity for more than three (3) minutes, in any one-hour period.</p> <p>ADP 07-2745 Condition 3 – 10/25/2007</p>	EU1 EU2	M1
Req-14	<p>Emissions from the two Weatherite space heaters and the Lynbar oven, combined, shall not exceed 4.0 tpy NO_x, 1.0 tpy CO, 0.5 tpy of VOC, 0.5 tpy of PM, and 0.25 tpy of SO₂.</p> <p>ADP 07-2745 Condition 4 – 10/25/2007</p>	EU1 EU2	M7
Req-15	<p>All surface coating shall be performed with high transfer efficiency (>65%) equipment, including, but not limited to high-volume low-pressure (HVLP) or air-assisted airless spray guns. Air cap pressure for each HVLP spray gun shall have a maximum cap pressure of 10 psi as measured by an air cap pressure gauge. An air cap pressure gauge shall be available to periodically check the air cap pressure.</p> <p>ADP 07-2745 Condition 10 – 10/25/2007</p>	EU-1 EU-2	N/A
Req-16	<p>The Permittee shall use good workplace practices, including, but not limited to: sealed cleaning agent containers, sealed resin/gel coat containers, high transfer efficiency resin application techniques, minimized pressure settings, proper spray gun set-up procedures, annual work practices training combined with new hire orientation and gun operator certification.</p> <p>ADP 07-2745 Condition 11 – 10/25/2007</p>	EU-1 EU-2	M5 M12 M13
Req-17	<p>All windows and doors shall be kept closed during surface coating, fiberglass lay-up, and surface finishing except when moving products into or out of production buildings.</p> <p>ADP 07-2745 Condition 12 – 10/25/2007</p>	EU-1 EU-2	N/A
Req-18	<p>Reasonable precautions shall be taken at all times to prevent and minimize fugitive emissions from facility operations</p> <p>SWCAA 400-040(3) – SIP 9/21/1995, Local Only 12/14/2006 ADP 07-2745 Condition 13 – 10/25/2007</p>	EU-1 EU-2	M5
Req-19	<p>Each stack shall discharge vertically and have a minimum height of 44 ft above ground level.</p> <p>ADP 07-2745 Condition 15 – 10/25/2007</p>	EU-1 EU-2	N/A
Req-20	<p>Any device that obstructs or prevents vertical discharge from any stack or vent, such as a rain cap, is prohibited.</p> <p>ADP 07-2745 Condition 16 – 10/25/2007</p>	EU-1 EU-2	N/A

Req. #	Applicable Requirements for Fiberglass Reinforced Product Manufacture and Boat Manufacture	Emission Point	Monitoring
Req-21	<p>The Frees ventilation system shall be operated:</p> <p>a. At all times while any spray lay-up is being performed; and</p> <p>b. A minimum of ten (10) minutes per hour while only hand lay-up is being performed and an aggregate of more than one (1) gallon of resin is used during the hour. The system operation shall occur at the end of each hour or partial hour while hand lay-up is being performed.</p> <p>When only closed molding is being performed, or when no hand lay-up or spray lay-up is being performed, the ventilation system may be turned off.</p> <p>ADP 07-2745 Condition 17 – 10/25/2007</p>	EU-1 EU-2	M20
Req-22	<p>The emission control systems that contain PM control shall be equipped with filters having a minimum arrestance of 97% in the gel coat booths, 80% in the lay-up booths, and 80% in the finishing operations area.</p> <p>Reference Method: ASHRAE Method 52.1-1992</p> <p>ADP 07-2745 Condition 18 – 10/25/2007</p>	EU-1 EU-2	M9
Req-23	<p>The Permittee shall not use more than 378 liters (100 gallons) of HAP-containing coatings over any 12-month rolling period. If more than 100 gallons of HAP-containing coatings is anticipated, the Permittee shall provide written notice to SWCAA and comply with all applicable requirements in 40 CFR 63 Subpart PPPP (§63.4480).</p> <p>ADP 07-2745 Condition 19 – 10/25/2007</p>	EU-1 EU-2	M19

Req. #	Applicable Requirements for Boat Manufacture	Emission Point	Monitoring
Req-24	<p>The Permittee shall meet the following 12-month rolling emission limit for boat manufacture, excluding any materials exempt under 40 CFR 63.5698(d):</p> $HAP\ Limit\ (kg) = (46 \times M_R + 159 \times M_{PG} + 291 \times M_{CG} + 54 \times M_{TR} + 214 \times M_{TG})$ <p>Where:</p> <p>M_R is the mass of production resin used in the past 12 months, Megagrams;</p> <p>M_{PG} is the mass of pigmented gel coat used in the past 12 months, Megagrams;</p> <p>M_{CG} is the mass of clear gel coat used in the past 12 months, Megagrams;</p> <p>M_{TR} is the mass of tooling resin used in the past 12 months, Megagrams; and</p> <p>M_{TG} is the mass of tooling gel coat used in the past 12 months, Megagrams.</p> <p>Compliance with this limit shall be demonstrated as specified in Section 6 of the Technical Background Document for ADP 07-2745.</p> <p>40 CFR 63.5698 – 8/22/2001 ADP 07-2745 Condition 5 – 10/25/2007</p>	EU-1 EU-2	M8 M10 M14 M15 M16

Req. #	Applicable Requirements for Boat Manufacture	Emission Point	Monitoring
Req-25	<p>Filled resins used as production resins shall not exceed 46 kilograms of organic HAP per Megagram of filled resin applied.</p> <p>40 CFR 63.5714(b) – 8/22/2001 ADP 07-2745 Condition 6 – 10/25/2007</p>	EU-1	M8 M10
Req-26	<p>Filled resins used as tooling resins shall not exceed 54 kilograms of organic HAP per Megagram of filled resin applied.</p> <p>40 CFR 63.5714(c) – 8/22/2001 ADP 07-2745 Condition 7 – 10/25/2007</p>	EU-1 EU-2	M8 M10
Req-27	<p>Resin applications that do not meet the definition of closed molding specified in §63.5779 and open molding operations that precede a closed molding operation shall comply with the limits in 40 CFR 63.5701 (Req-24).</p> <p>40 CFR 63.5728 – 8/22/2001 ADP 07-2745 Condition 8 – 10/25/2007</p>	EU-1 EU-2	M8 M10 M16
Req-28	<p>For each boat manufacture production resin that must meet either a military specification or approved by the U.S. Coast Guard for use under 46 CFR Subchapter Q or 46 CFR Subchapter T, the Permittee shall only apply the resin using nonatomizing resin application equipment.</p> <p>40CFR 63.5698(d)(1) – 8/22/2001 ADP 07-2745 Condition 20 – 10/25/2007</p>	EU-1 EU-2	M8 M14
Req-29	<p>When the Permittee chooses to change compliance options under §63.5701 to demonstrate compliance with 40 CFR 63.5698 (Req-24), the Permittee shall notify SWCAA, in writing, within seven (7) days implementing the new compliance option.</p> <p>ADP 07-2745 Condition 21 – 10/25/2007</p>	EU-1 EU-2	N/A
Req-30	<p>As a work practice standard, all resin and gel coat mixing containers with a capacity equal to or greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, shall have a cover. The cover shall have no visible gaps and be in place at all times, except when material is being manually added to or removed from the container or when mixing or pumping equipment is being placed or removed from the container.</p> <p>40 CFR 63.5731(a) and (b) – 8/22/2001 ADP 07-2745 Condition 22 – 10/25/2007</p>	EU-1 EU-2	M8 M10 M12
Req-31	<p>For routine flushing of resin and gel coat application equipment, cleaning solvents containing no more than five (5) percent organic HAP by weight shall be prohibited. For removing cured resin or gel coat from application equipment, no organic HAP content limit applies.</p> <p>40 CFR 63.5734(a) – 8/22/2001 ADP 07-2745 Condition 23 – 10/25/2007</p>	EU-1 EU-2	M8 M10 M13

Req. #	Applicable Requirements for Boat Manufacture	Emission Point	Monitoring
Req-32	<p>The Permittee shall store organic HAP-containing solvents used for removing cured resin or gel coat in containers with covers. The covers shall have no visible gaps and shall be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters (2.0 gallons), the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.</p> <p style="text-align: center;">40 CFR 63.5734(b) – 8/22/2001 ADP 07-2745 Condition 24 – 10/25/2007</p>	EU-1 EU-2	M8 M10 M13

Req. #	Applicable Requirement for Fiberglass Reinforced Product Manufacture	Emission Point	Monitoring														
Req-33	<p>The Permittee shall only use resins and gel coats for FRP manufacture that meet the following applicable emission limits:</p> <table border="1" data-bbox="250 380 1159 1335"> <thead> <tr> <th data-bbox="250 380 607 422">Operation Type</th> <th data-bbox="607 380 1159 422">Application Type and Limit</th> </tr> </thead> <tbody> <tr> <td data-bbox="250 422 607 537">a. Open molding – corrosion- resistant and/or high strength (CR/HS)</td> <td data-bbox="607 422 1159 537"> i. Mechanical resin application 113 lb/ton ii. Manual resin application 123 lb/ton </td> </tr> <tr> <td data-bbox="250 537 607 653">b. Open molding – non-CR/HS</td> <td data-bbox="607 537 1159 653"> i. Mechanical resin application 88 lb/ton ii. Manual resin application 87 lb/ton </td> </tr> <tr> <td data-bbox="250 653 607 768">c. Open molding – tooling</td> <td data-bbox="607 653 1159 768"> i. Mechanical resin application 254 lb/ton ii. Manual resin application 157 lb/ton </td> </tr> <tr> <td data-bbox="250 768 607 884">d. Open molding – low-flame spread/ low-smoke products</td> <td data-bbox="607 768 1159 884"> i. Mechanical resin application 497 lb/ton ii. Manual resin application 238 lb/ton </td> </tr> <tr> <td data-bbox="250 884 607 999">e. Open molding – shrinkage controlled resins</td> <td data-bbox="607 884 1159 999"> i. Mechanical resin application 354 lb/ton ii. Manual resin application 180 lb/ton </td> </tr> <tr> <td data-bbox="250 999 607 1335">f. Open molding – gel coat</td> <td data-bbox="607 999 1159 1335"> i. Tooling gel coating 440 lb/ton ii. White/off white pigmented gel coating 267 lb/ton iii. All other pigmented gel coating 377 lb/ton iv. CR/HS or high performance gel coat 605 lb/ton v. Fire retardant gel coat 854 lb/ton vi. Clear production gel coat 522 lb/ton </td> </tr> </tbody> </table> <p data-bbox="250 1371 1175 1440">Compliance with this limit shall be demonstrated as specified in Section 6 of the Technical Support Document for ADP 07-2445.</p> <p data-bbox="477 1472 948 1505">ADP 07-2745 Condition 9 – 10/25/2007</p>	Operation Type	Application Type and Limit	a. Open molding – corrosion- resistant and/or high strength (CR/HS)	i. Mechanical resin application 113 lb/ton ii. Manual resin application 123 lb/ton	b. Open molding – non-CR/HS	i. Mechanical resin application 88 lb/ton ii. Manual resin application 87 lb/ton	c. Open molding – tooling	i. Mechanical resin application 254 lb/ton ii. Manual resin application 157 lb/ton	d. Open molding – low-flame spread/ low-smoke products	i. Mechanical resin application 497 lb/ton ii. Manual resin application 238 lb/ton	e. Open molding – shrinkage controlled resins	i. Mechanical resin application 354 lb/ton ii. Manual resin application 180 lb/ton	f. Open molding – gel coat	i. Tooling gel coating 440 lb/ton ii. White/off white pigmented gel coating 267 lb/ton iii. All other pigmented gel coating 377 lb/ton iv. CR/HS or high performance gel coat 605 lb/ton v. Fire retardant gel coat 854 lb/ton vi. Clear production gel coat 522 lb/ton	EU-1 EU-2	M8 M11
Operation Type	Application Type and Limit																
a. Open molding – corrosion- resistant and/or high strength (CR/HS)	i. Mechanical resin application 113 lb/ton ii. Manual resin application 123 lb/ton																
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c. Open molding – tooling	i. Mechanical resin application 254 lb/ton ii. Manual resin application 157 lb/ton																
d. Open molding – low-flame spread/ low-smoke products	i. Mechanical resin application 497 lb/ton ii. Manual resin application 238 lb/ton																
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f. Open molding – gel coat	i. Tooling gel coating 440 lb/ton ii. White/off white pigmented gel coating 267 lb/ton iii. All other pigmented gel coating 377 lb/ton iv. CR/HS or high performance gel coat 605 lb/ton v. Fire retardant gel coat 854 lb/ton vi. Clear production gel coat 522 lb/ton																

Req. #	Applicable Requirement for Fiberglass Reinforced Product Manufacture	Emission Point	Monitoring
Req-34	When the Permittee chooses to change compliance options under §63.5810 to demonstrate compliance with 40 CFR 63.5805 (Req-33), the Permittee shall notify SWCAA, in writing, within seven (7) days of implementing the new compliance option. ADP 07-2745 Condition 25 – 10/25/2007	EU-1 EU-2	N/A
Req-35	Production resins that must meet military specification and that are exempted under §63.5790(d) shall only be applied using nonatomizing resin application equipment, unless an adequate written demonstration that the use of such equipment is infeasible has been submitted to and accepted by SWCAA. 40 CFR 63.5790(d) – 8/22/2001 ADP 07-2745 Condition 26 – 10/25/2007	EU-1 EU-2	M8 M17
Req-36	As a work practice standard, during closed molding using compression or injection molding, the Permittee shall uncover, unwrap, or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. 40 CFR 63.5805(b) and §63.5835(a) – 8/22/2001 ADP 07-2745 Condition 27 – 10/25/2007	EU-1 EU-2	N/A
Req-37	As a work practice standard, the Permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin or gel coat from application equipment. Application equipment includes any equipment that directly contacts resins or gel coats. 40 CFR 63.5805(b) and §63.5835(a) – 8/22/2001 ADP 07-2745 Condition 28 – 10/25/2007	EU-1 EU-2	M8 M11 M18
Req-38	As a work practice standard, the Permittee shall keep containers that store VOC and HAP containing materials closed or covered except during the addition or removal of materials. This includes all VOC and HAP containing materials that are used to clean and/or flush surface coating equipment, spray lines, tools or other equipment, which shall be collected into closed containers 40 CFR 63.5805(b) and §63.5835(a) – 8/22/2001 ADP 07-2745 Condition 29 – 10/25/2007	EU-1 EU-2	M8 M11 M18

VII. MONITORING REQUIREMENTS

To assure compliance with all applicable requirements, the Permittee shall perform the monitoring program specified below. Each monitoring requirement is indexed according to the underlying requirement(s). Pursuant to WAC 173-401-530(2)(c), the following monitoring requirements do not apply to IEUs.

M1. Opacity Monitoring**WAC 173-401-615(1)(b) – 10/17/2002**

This monitoring requirement applies to Req-1 and Req-13.

The Permittee shall perform monthly inspection by performing a brief qualitative observation of each emission unit and affected operation during daylight hours for the purpose of identifying potential opacity limit violations.

If no visible emissions are observed, the Permittee shall make a record as per Section VIII of this permit.

If visible emissions are observed, the Permittee shall verify that the emission unit and any associated air pollution control equipment emitting the visible emissions are operating properly. Adjustments, repairs, or maintenance shall be performed on the source or control equipment to reduce the visible emissions to a level at or below the applicable opacity limit within twenty-four (24) hours of initial discovery of the visible emissions.

If visible emissions cannot be reduced to a level at or below the applicable opacity limit, then the Permittee shall demonstrate compliance within three (3) days of initial observation of visible emissions by using SWCAA Method 9 or EPA Method 9 as applicable to the emission unit.

Implementation of corrective actions does not relieve the Permittee from the obligation of reporting permit deviations as specified in WAC 173-401-615(3). Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M2. PM Emissions Monitoring**WAC 173-401-615(1)(b) – 10/17/2002**

This monitoring requirement applies to Reqs-2, 4, 9, and 10.

The Permittee shall perform monthly inspection by performing a brief qualitative observation of each emission unit and affected operation during daylight hours for the purpose of identifying potential PM emissions violations.

If no PM emissions are observed, the Permittee shall make a record as per Section VIII of this permit.

If PM emissions are observed, within sixty (60) minutes of observing PM emissions or receiving a complaint, the Permittee shall verify that the emission unit and any associated air pollution control equipment emitting the PM emissions are operating properly. Adjustments, repairs, or maintenance shall be performed on the emission unit or control equipment to reduce the PM emissions to a reasonable level within twenty-four (24) hours of initial discovery of the PM emissions.

If PM emissions cannot be reduced to a reasonable level, the emissions unit shall be shut down until such time as adjustments, repairs, or maintenance can be done to reduce the PM emissions.

Implementation of corrective actions does not relieve the Permittee from the obligation of reporting permit deviations as specified in WAC 173-401-615(3). Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M3. Complaint Monitoring **WAC 173-401-615(1)(b) – 10/17/2002**

This monitoring requirement applies to Reqs-2, 4, 5, and 8.

The Permittee shall record, and maintain record of, any complaints received by either the Permittee or SWCAA. All complaints shall be investigated no later than one (1) work day after the Permittee has been notified. Investigation shall verify the validity of each complaint, the cause of emissions which prompted the complaint, and what, if any, corrective action was taken in response to the complaint. Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M4. Fugitive Emissions Monitoring **WAC 173-401-615(1)(b) – 10/17/2002**

This monitoring requirement applies to Req-3 and Req-8.

The Permittee shall perform monthly inspection by performing a brief qualitative observation of each emission unit and affected operation during daylight hours for the purpose of identifying potential fugitive emissions.

If no fugitive emissions are observed, the Permittee shall make a record as per Section VIII of this permit.

If fugitive emissions are observed or if fugitive emissions are indicated by a complaint, within sixty (60) minutes of observing fugitive emissions or receipt of a complaint, the Permittee shall verify that the emission unit and any associated air pollution control equipment emitting the fugitive emissions are operating properly and that reasonable precautions and good work practices are being employed to minimize emissions. Reasonable precautions and good work practices include, but are not limited to, worker training programs, closed doors and windows, vertical exhaust of ventilation equipment, and proper operations of ventilation systems. Adjustments, repairs, or maintenance shall be performed on the emission unit or control equipment to reduce the fugitive emissions to a level at or below the applicable limit within twenty-four (24) hours of initial discovery of the fugitive emissions.

Implementation of corrective actions do not relieve the Permittee from the obligation of reporting permit deviations as specified in WAC 173-401-615(3). Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M5. Work Practices to Minimize PM Emissions **WAC 173-401-615(1)(b) – 10/17/2002**

This monitoring requirement applies to Req-16.

The Permittee shall perform monthly inspections of affected operations during daylight hours for the purpose of insuring that all doors and windows are kept closed during surface finishing operations. An exception is allowed while moving products into or out of the building. Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M6. SO₂ Emission Standard **WAC 173-401-615(1)(b) – 10/17/2002**

This monitoring requirement applies to Req-6.

The Permittee shall certify in each semi-annual report that only natural gas and/or propane is used as fuel for all combustion units at the facility.

M7. Emissions from Heating Units

WAC 173-401-615(1) – 10/17/2002
ADP 07-2745 Condition 4 – 10/25/2007

This monitoring requirement applies to Req-14.

The Permittee shall record the amount of natural gas and/or propane combusted in the production shop space heaters on a monthly basis. Compliance with specified emission limits is to be calculated based on natural gas consumption and emission factors from AP-42 Section 1.4 (July 2001) for natural gas consumption. Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M8. FRP and Boat Manufacture Emissions and Usage

ADP 07-2745 Condition 1, 2, 5, 9, 20, and 26 – 10/25/2007

This monitoring requirement applies to Reqs-11, 12, 24, 25, 26, 27, 30, 31, 32, 33, 34, 37, and 38.

The Permittee shall maintain purchase records, usage records, and Material Safety Data Sheet (MSDS) information or technical data sheets at the facility for each VOC, TAP, or HAP containing product used at the facility.

Compliance with specified emission limits is to be calculated based on material balance methodology and emission factors from the American Composites Manufacturer's Association as per the Technical Support Document for ADP 07-2745.

Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M9. PM Filter Monitoring

ADP 07-2745 Condition 18 and 32 – 10/25/2007

This monitoring requirement applies to Req-22.

The Permittee shall record filter replacement on each production booth for each occurrence. The Permittee shall also maintain current manufacturer's technical specifications for all filters used in particulate matter control systems that exhaust to ambient air. The Permittee shall certify that the average arrestance (ASHRAE Method 52.1-1992) of filters in the gelcoat booths and lay-up booths is equal to, or greater than, 97% and 80% respectively. Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M10. Organic HAP Content Determination – Boat Manufacture**40 CFR 63.5704(a) and (b) – 8/22/2001****40 CFR 63.5710 – 8/22/2001****40 CFR 63.5713 – 8/22/2001****40 CFR 63.5731 – 8/22/2001****40 CFR 63.5734 – 8/22/2001****40 CFR 63.5767 – 8/22/2001****40 CFR 63.5758(a)(1) through (a)(5) – 8/22/2001****ADP 07-2745 Conditions 5, 6, 7, 23, 24, 34, 38, 39, and 40 – 10/25/2007**

This monitoring requirement applies to Reqs-24, 25, 26, 27, 30, 31, and 32.

For each resin and gelcoat used by the Permittee, the Permittee shall determine the total organic HAP content in accordance with 40 CFR 63.5797 by:

- a. 40 CFR 63, Appendix A Method 311.
 - i. Include in the organic HAP total each organic HAP that is measured to be present at 0.1% by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other compounds. Express the mass fraction of each organic HAP as a value truncated to four places after the decimal point (for example, 0.1234).
 - ii. Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point (for example, 0.123).
- b. ASTM D1259–85 (Standard Test Method for Nonvolatile Content of Resins). You may use ASTM D1259–85 to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAP.
- c. Alternative method. An alternative test method for determining mass fraction of organic HAP may be used if the alternative test is submitted in accordance with §63.7(f) and approved by the EPA Administrator.
- d. Information from the supplier or manufacturer of the material. Information other than that generated by the above, such as MSDSs and manufacturer's formulation data or technical data sheets, may be used according to the following:
 - i. Include in the organic HAP total each organic HAP that is present at 0.1% by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other compounds.
 - ii. If the organic HAP content is provided by the material supplier or manufacturer as a range, then use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a) through (c) above exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then use the measured organic HAP content to determine compliance.
 - iii. If the organic HAP content is provided as a single value, assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a) through (d) above is less than 2% higher than the value for total organic HAP content provided by the material supplier or manufacturer, then use the provided value to

- demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2% or more, then use the measured organic HAP content to determine compliance.
- e. Solvent blends. Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, you may use the values for organic HAP content that are listed in 40 CFR 63 Subpart VVVV Table 5 or 6. Table 6 to this subpart may be used only if the solvent blends in the materials do not match any of the solvent blends in Table 5 and it is only known whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in Table 5 or 6, then the test results must be used for determining compliance.

Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M11. Organic HAP Content Determination – FRP Manufacture

40 CFR 63.5797 – 4/21/2003

40 CFR 63.5798 – 4/21/2003

40 CFR 63.5799 – 4/21/2003

40 CFR 63.5805 – 4/21/2003

40 CFR 63.5810 – 4/21/2003

40 CFR 63.5835 – 4/21/2003

40 CFR 63.5860 – 4/21/2003

40 CFR 63.5900(a)(2) and (3) – 4/21/2003

ADP 07-2745 Conditions 9, 28, 29, 44, and 45 – 10/25/2007

This monitoring requirement applies to Reqs-33, 37, and 38.

For each resin and gelcoat used by the Permittee in FRP Manufacture, the Permittee shall determine the total organic HAP content in accordance with 40 CFR 63.5797 by:

- a. Information from the supplier or manufacturer of the material.
 - i. Include in the organic HAP total each organic HAP that is present at 0.1% by mass or more for OSHA-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other organic HAP compounds.
 - ii. If the organic HAP content is provided by the material supplier or manufacturer as a range, use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by Method 311, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then you must use the measured organic HAP content to determine compliance.
 - iii. If the organic HAP content is provided as a single value, use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the provided value may be used to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then use the measured organic HAP content to determine compliance.

- b. 40 CFR 63 Appendix A Method 311. Method 311 may be used to determine organic HAP content.

Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M12. Standards for Resin and Gel Coat Mixing Operations – Boat Manufacture
40 CFR 63.5731 – 8/21/2001
ADP 07-2745 Conditions 22 and 41 – 10/25/2007

This monitoring requirement applies to Req-16 and Req-30.

At least once per month, the Permittee shall visually inspect all mixing containers subject to Req-21. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover. A record of which mixing containers are subject to this condition and the results of the inspections, including a description of any repairs or corrective actions taken shall be maintained.

Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M13. Standards for Resin and Gel Coat Application Equipment Cleaning Operations – Boat Manufacture
40 CFR 63.5734 – 8/21/2001
40 CFR 63.5737 – 8/21/2001
ADP 07-2745 Conditions 23, 24, 42, and 43 – 10/25/2007

This monitoring requirement applies to Req-31 and Req-32.

At least once per month, the Permittee shall visually inspect any containers subject to Req-22 and Req-23. The inspection shall ensure that the containers have covers with no visible gaps. A record of the monthly inspections and any repairs made to the covers shall be maintained.

Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M14. HAP Limit Exemption, Military Specification Resin – Boat Manufacture
40 CFR 63.5698(d)(1) – 4/21/2003
ADP 07-2745 Conditions 5, 20, 35, and 52 – 10/25/2007

This monitoring requirement applies to Req-24 and 28.

For each boat manufacture production resin that is exempt per §63.5698(d)(1) and must meet either a military specification or approved by the U.S. Coast Guard for use under 46 CFR Subchapter Q or 46 CFR Subchapter T, the Permittee shall keep a record of:

- a. The resin name;
- b. Documentation of the military specification or U.S. Coast Guard approval;
- c. The total organic HAP content; and
- d. The total monthly resin usage.

Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M15. HAP Limit Exemption, Touch-Up Tooling Gel Coat – Boat Manufacture**40 CFR 63.5698(d)(2) – 8/22/2001****ADP 07-2745 Conditions 5 and 36 – 10/25/2007**

This monitoring requirement applies to Req-24.

For each pigmented, clear, and tooling gel coat used for part or mold touch up for which the Permittee is seeking exemption from the emission limit in Req-24, the Permittee shall keep a record of:

- a. The amount of pigmented, clear, and tooling gel coat used for part or mold touch up used per month;
- b. All calculations showing that the amount of pigmented, clear, and tooling gel coat used for part or mold touch up does not exceed 1% by weight of the 12-month rolling sum of all gel coats used.

Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M16. HAP Limit Exemption, Skin Coat Vinylester Resin– Boat Manufacture**40 CFR 63.5698(d)(3)- 8/22/2001****ADP 07-2745 Conditions 5 and 36 – 10/25/2007**

This monitoring requirement applies to Req-24.

For each pure, 100% vinylester resin used for skin coats for which the Permittee is seeking exemption from the emission limit in Req-24, the Permittee shall keep a record of:

- a. The amount of pure, 100% vinylester resin used for skin coats used per month;
- b. All calculations showing that the amount of pure, 100% vinylester resin used for skin coats does not exceed 5% by weight of the 12-month rolling sum of all resins used.

Records of monitoring activities shall be maintained in accordance with Section VIII of this permit.

M17. HAP Limit Exemption, Military Specification Resin – FRP Manufacture**40 CFR 63.5790(d) – 8/22/2001****ADP 07-2745 Conditions 9, 26, 44, and 54 – 10/25/2007**

This monitoring requirement applies to Req-35.

For each FRP manufacture production resin that must meet a military specification and the Permittee chooses to seek an exemption from the organic HAP limit (Req-33) per §63.5790(d), the Permittee shall keep a record of the following:

- a. The resin name;
- b. Documentation of the specifications of the production resin, which have been certified as accurate by the military procurement officer requesting the resin. The certification shall state that that a specific resin is required or that a specific HAP content is required;
- c. The total organic HAP content as determined under §63.5797 or §63.5798; and

d. The quantity of each military specification resin used.

M18. Solvent HAP Content – FRP Manufacture

40 CFR 63.5805(b) – 8/22/2001
40 CFR 63.5835(a) – 8/21/2001
40 CFR 63.5900(a)(4) and (c) – 8/21/2001
40 CFR 63.5915 – 8/21/2001
ADP 07-2745 Condition 28 – 10/25/2007

This monitoring requirement applies to Req-37 and Req-38.

The organic HAP content of each cleaning solvent used to remove cured resin or gel coat shall be determined according to §63.5758 and recorded. If the Permittee recycled cleaning solvents on site, the Permittee may use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in §63.5758 for demonstrating compliance with organic HAP content limits.

M19. Coating Usage

ADP 07-2745 Condition 34 – 10/25/2007

For each coating used on plastic parts and products (FRP or boat), the Permittee shall record the following:

- a. The coating name;
- b. The total HAP content (by weight); and
- c. The 12-month rolling usage (in gallons).

VIII. RECORDKEEPING REQUIREMENTS (WAC 173-401-615(2) – 10/17/2002)

All monitoring records shall be maintained in a readily accessible form for a minimum period of five years (WAC 173-401-615(2)(c) – 10/17/2002). Pursuant to WAC 173-401-530(2)(c) (10/17/2002), none of the recordkeeping requirements apply to IEUs. Records shall be maintained as per 40 CFR 60.7(f) where applicable. The Permittee shall maintain records of required monitoring activities as identified in **M1-M19** as follows:

K1. General Recordkeeping

WAC 173-401-615(2) – 10/17/2002

- a. Inspections and Certifications
 - i. The date, place, and time of activity;
 - ii. Who conducted the inspection or certification;
 - iii. The operating conditions existing at the time of the activity;
 - iv. Compliance status of each monitored requirement as described in Sections V and VII of this permit; and
 - v. Corrective action taken in response to permit deviations and/or complaints.
- b. Complaints
 - i. The date and time of complaint;
 - ii. Name of the complainant;
 - iii. The nature of the complaint;
 - iv. Date inspection was conducted; and

- v. Corrective action taken in response to complaint.
- c. Maintenance Activities
 - i. The date, place, and time of activity;
 - ii. Who conducted the maintenance; and
 - iii. A description of the maintenance conducted.

K2. Operation and Maintenance Log

WAC 173-401-615(2) – 10/17/2002
ADP 07-2745 Condition 32 – 10/25/2007

The following shall be recorded in an operation and maintenance (O & M) log:

- a. Any upset condition or excess emission that may result in the emission of air pollutants for each occurrence;
- b. The amount and type of hazardous waste disposed shall be recorded once per month; and
- c. Each period during which an emission control device is not operating due to maintenance, repair, filter replacement, periods during which only closed molding is being performed, periods during which no hand lay-up or spray lay-up is being performed, or any other activity that may affect the emission of air pollutants shall be recorded for each occurrence.
- d. The operation of the Frees system shall be recorded as follows:
 - i. The time the Frees system was turned on and off;
 - ii. The activity that was taking place during each period (e.g., closed molding only, spray lay-up, hand lay-up); and
 - iii. The total amount of resin that was used for hand lay-up during each period.

K3. Coating Usage

ADP 07-2745 Condition 34 – 10/25/2007

For each coating used on plastic parts and products (FRP or boat), the Permittee shall record the following:

- a. The coating name;
- b. The total HAP content (by weight); and
- c. The 12-month rolling usage (in gallons).

K4. HAP Limit Compliance (Boat Manufacture) – Emissions Averaging Option

40 CFR 63.5704(a) – 8/22/2001
40 CFR 63.5707(b) – 8/22/2001
40 CFR 63.5710 – 8/22/2001
40 CFR 63.5764(c) and (d) – 8/22/2001
40 CFR 63.5767 – 8/22/2001

ADP 07-2745 Conditions 38 and 40 – 10/25/2007

If the Permittee chooses to use the model point value averaging option to comply with the emission limit in Req-24, the Permittee shall:

- a. Determine the organic HAP content of resins and gel coats used;
- b. Complete calculations specified in §63.5710 to show that the organic HAP emissions do not exceed the limit;

- c. Keep the following records for each resin and gel coat:
 - i. The organic HAP content of the materials used;
 - ii. Amount material used per month;
 - iii. The application method used;
 - iv. If the resin a filled production resin or a filled tooling resin, the percent filler used per resin; and
 - v. Monthly (12-month rolling) calculations showing that the operations covered by the plan will comply with the open molding emission limit.
- d. Prepare an implementation plan describing the steps proposed to bring the facility into compliance. The plan shall include the following:
 - i. A description of each operation included in the average;
 - ii. The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions; and
 - iii. Calculations showing that the operations covered by the plan will comply with the open molding emission limit.

K5. HAP Limit Compliance (Boat Manufacture) – Compliant Materials Option

40 CFR 63.5701(b) – 8/22/2001

40 CFR 63.5704(b) – 8/22/2001

40 CFR 63.5713 – 8/22/2001

40 CFR 63.5764(c) and (d) – 8/22/2001

40 CFR 63.5767 – 8/22/2001

ADP 07-2745 Conditions 39 and 40 – 10/25/2007

If the Permittee chooses to use the compliant materials option under §63.5704(a) to comply with the emission limit in Req-24, for each resin and gel coat the Permittee shall:

- a. Determine the organic HAP content of each resin and gel coat used;
- b. Complete calculations specified in §63.5713 to show that the organic HAP content for each resin and gel coat does not exceed the Alternative Organic HAP Content Requirement under 40 CFR 63 Subpart VVVV Table 2; and
- c. Keep the following records for each resin and gel coat:
 - i. The organic HAP content of each resin and gel coat used;
 - ii. Amount of resin and gel coat used per month;
 - iii. The application method used; and
 - iv. If an individual resin or gel coat cannot meet the Alternative Organic HAP Content Requirement under 40 CFR 63 Subpart VVVV Table 2, then the Permittee shall include any calculations required under §63.5713(c) to demonstrate that all resins and gel coats used in an operation comply with the Alternative Organic HAP Content Requirement 40 CFR 63 Subpart VVVV Table 2.

K6. MACT Records – Boat Manufacture

40 CFR 63.5767 – 8/22/2003

ADP 07-2745 Condition 40 – 10/25/2007

The Permittee shall keep records of the following:

- a. A copy of each notification and report submitted to comply with 40 CFR 63 Subpart VVVV;

- b. All documentation supporting any notification or report submitted; and
- c. For each resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used in boat manufacture, the Permittee shall keep monthly records of the following:
 - i. The total amounts used per month in open molding production;
 - ii. The 12-month rolling weighted average organic HAP content for each operation, expressed as weight percent, determined according to §63.5758;
 - iii. For open molding production resin and tooling resin, the amounts of each applied by atomized and nonatomized methods; and
 - iv. Calculations demonstrating that the boat manufacturing operation, except for closed molding operations, was in continuous compliance with organic HAP emissions limits by maintaining an organic HAP emissions factor value less than or equal to the emission limit in Req-24.

K7. HAP Limit Exemption, Military Specification Resin – FRP Manufacture**40 CFR 63.5790(d) – 4/21/2003****ADP 07-2745 Condition 44– 10/25/2007**

For each FRP manufacture production resin that must meet a military specification, the Permittee shall keep a record of the following:

- a. The resin name;
- b. Documentation of the specifications of the production resin, which have been certified as accurate by the military procurement officer requesting the resin. The certification shall state that that a specific resin is required or that a specific HAP content is required;
- c. The total organic HAP content as determined under §63.5797 or §63.5798; and
- d. The quantity of each military specification resin used.

K8. MACT Records – FRP Manufacture**40 CFR 63.5895(d) – 8/22/2001****40 CFR 63.5915 – 8/22/2001****ADP 07-2745 Condition 45 – 10/25/2007**

For each gel coat and resin used in FRP manufacture the Permittee shall keep monthly records of the following:

- a. Monthly usage and 12-month rolling sum;
- b. Organic HAP content as determined using §63.5797 or §63.5798;
- c. The operation type and application method as per 40 CFR 63 Subpart WWWW Table 3, Table 5, or Table 7;
- d. The applicable operation type and application method per 40 CFR 63 Subpart WWWW Table 1 or documentation of an organic HAP emissions test to determine a site-specific organic HAP emissions factor using the test procedures in §63.5850;
- e. All data, calculations, and assumptions used to determine compliance under 40 CFR 63 Subpart WWWW Table 3, Table 5, or Table 7;
- f. A certified statement that the facility is in compliance with the work practices standards in Conditions 18, 19, and 20 (40 CFR 63 Subpart WWWW Table 4); and
- g. A demonstration that FRP manufacturing operation, except for closed molding operations, was in continuous compliance with organic HAP emissions limits by maintaining an organic HAP

emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Req-33.

IX. REPORTING REQUIREMENTS

All application forms, reports, and compliance certifications must be certified by a responsible official. Certification shall state that, based on information and belief formed after reasonable inquiry, the statements, and information contained in the submittal are true, accurate, and complete. Where an applicable requirement requires reporting more frequently than once every six (6) months, the responsible official's certification need only be submitted once ever six (6) months, covering all required reporting since the date of the last certification.

All application forms, reports, and compliance certifications shall be submitted to SWCAA at the address listed below. Annual compliance certifications shall be submitted to both SWCAA and EPA at the addresses listed below.

Control Officer	Administrator
SWCAA 11815 NE 99th St, Suite 1294 Vancouver, WA 98682-2322	U.S. EPA Region 10 Federal & Delegated Air Programs Unit 1200 Sixth Avenue, MS AWT-107 Seattle, WA 98101

R1. Deviations from Permit Conditions

40 CFR 60.7(b) – 7/1/2002
40 CFR 63.5900(b) – 4/21/2003
40 CFR 63.5910(c)(5), (d), (e), and (g) – 4/21/2003
40 CFR 63.5764(c)(7) – 8/22/2001
WAC 173-401-615(3)(b) – 10/17/2002
SWCAA 400-107 – 9/21/1995 SIP, 12/14/2006 State Only
SWCAA 400-115 – 12/14/2006 Local Only
ADP 07-2745 Condition 50 – 10/25/2007

Excess emissions shall be reported as soon as possible but no later than forty-eight (48) hours after discovery in accordance with SWCAA 400-107. Deviations from permit requirements shall be reported no later than thirty (30) days after the end of the month during which the deviation is discovered. Deviations which represent a potential threat to human health or safety shall be reported as soon as possible but no later than twelve (12) hours after the deviation is discovered. Reports of deviations shall include:

- a. Whether or not the deviation is due to upset conditions;
- b. The probable cause of the deviation; and
- c. The corrective action taken, and when the corrective action was initiated.

Excess emissions, including opacity exceedances for startups, shut downs, upsets, and maintenance shall be reported to SWCAA during the current business day or next business morning and shall be noted in the semi-annual report.

R2. Complaint Reports**WAC 173-401-615(3) – 10/17/2002**

The Permittee shall report all complaints to SWCAA within three (3) days of receipt. Complaint reports shall include the date and time of the complaint, the name of the complainant, and the nature of the complaint.

R3. Semiannual Monitoring Reports**WAC 173-401-615(3) – 10/17/2002**

A semi-annual report on the status of all monitoring requirements of this permit, consistent with WAC 173-401-615(3), shall be submitted to SWCAA twice per year for the periods January 1 through June 30 and July 1 through December 31 by September 30th and March 15th, respectively. All instances of deviation from permit requirements shall be clearly identified, including possible exceptions to compliance any periods during which compliance is required.

For all EPA Method 9 or SWCAA Method 9 monitoring conducted during each semi-annual period, the semi-annual report shall include a copy of the most recent opacity certification card(s) containing the name, certificate number, and expiration date for all personnel conducting EPA Method 9 or SWCAA Method 9 monitoring during the semi-annual period.

The semi-annual report shall contain a certification by a responsible official consistent with the provisions of WAC 173-401-520 of all required monitoring and reports previously submitted during the semi-annual period that have not already been certified and any deviation from permit requirements shall be clearly identified.

R4. Semiannual Compliance Report – Boat Manufacture**40 CFR 63.5704(a)(5) and (b)(4) – 8/22/2001****40 CFR 63.5764(b)(3) – 4/21/2003****ADP 07-2745 Condition 53 – 10/25/2007**

A written semiannual, January 1 through June 30 and July 1 through December 31, compliance report shall be submitted to SWCAA by October 15 and April 15, respectively. The report shall contain the following:

- a. Company name and address;
- b. A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report;
- c. The date of the report and the beginning and ending dates of the reporting period;
- d. A description of any changes in the manufacturing process since the last compliance report;
- e. A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or MACT model point value averaging provision with which the Permittee is complying. The statement or table must also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period;
- f. If the Permittee was in compliance with the emission limits and work practice standards during the reporting period, the Permittee must include a statement to that effect;

- g. If the Permittee deviated from an emission limit or work practice standard during the reporting period, the Permittee shall also include the information listed below in the semiannual compliance report;
 - i. A description of the operation involved in the deviation;
 - ii. The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation;
 - iii. A description of any corrective action the Permittee took to minimize the deviation and actions the Permittee has taken to prevent it from happening again; and
 - iv. A statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.
- h. If the Permittee has prepared an implementation plan, the Permittee shall:
 - i. Submit the implementation plan to SWCAA with the notification of compliance; and
 - ii. Include the implementation plan with the semiannual compliance report.
- i. If the Permittee has revised an implementation plan, the revised implantation plan shall be submitted as part of the semiannual compliance report.

R5. Semiannual Compliance Report – FRP Manufacture

40 CFR 63.5910(b) – 4/21/2003

40 CFR 63.5910(g) – 4/21/2003

40 CFR 63.5805(f) – 4/21/2003

40 CFR 63.5895(d) – 4/21/2003

ADP 07-2745 Condition 53 – 10/25/2007

A written semiannual, January 1 through June 30 and July 1 through December 31, compliance report shall be submitted to SWCAA by October 15 and April 15, respectively. The report shall contain the following:

- a. Company name and address;
- b. A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report;
- c. If there were no deviations from any applicable emission limit during the reporting period, a statement that there were no deviations from emission limits;
- d. If there were no deviations from work practice standards during the reporting period, a statement that there were no deviations from the applicable work practice standards under 40 CFR 63 Subpart WWWW Table 4;
- e. The date of the report and the beginning and ending dates of the reporting period;
- f. If the facility has changed the compliance option under §63.5810, a statement of the new compliance option used since the last semiannual report; and
- g. If there were no deviations during the reporting period from any applicable organic HAP emissions limitations (i.e. emissions limit and operating limit) and there are no deviations from the requirements for work practice standards (40 CFR 63 Subpart WWWW Table 4), the Permittee shall include a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.

R6. Annual Compliance Certification Reports **WAC 173-401-630(5) – 11/4/1993**

An annual certification of compliance with all terms and conditions of this permit, in accordance with WAC 173-401-630(d), for the period from January 1 to December 31 shall be submitted to SWCAA and EPA by March 15th of the following year. The certification shall include:

- a. Identification of each term or condition of the permit that is the basis of the certification;
- b. Statement of compliance status;
- c. Whether compliance was continuous or intermittent;
- d. Method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with WAC 173-401-615;
- e. Such other facts as SWCAA may require to determine the compliance status of the source; and
- f. Such additional requirements as may be specified pursuant to FCAA §114(a)(3) and §504(b).

R7. Emission Inventory Reports

WAC 173-400-105 – 9/20/1993 SIP, 6/8/2007 State Only
SWCAA 400-105 – 9/21/1995 SIP, 12/14/2006 Local Only
ADP 07-2745 Condition 48 – 10/25/2007

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 contain the following for the annual period:

- a. The sum of emissions of NO_x, SO₂, CO, VOC, PM, PM₁₀, PM_{2.5}, TAPs, and HAPs;
- b. The quantity of products (e.g. resins, gel coats, coatings, and solvents) containing VOC, TAP, and HAP;
- c. The VOC, TAP, and HAP content of products (e.g. resins, gel coats, coatings, and solvents);
- d. The type and quantity of hazardous waste disposed; and
- e. The amount of natural gas used at the facility.

Emissions shall be determined consistent with Section 6 of the Technical Support Document for this ADP.

R8. Military Specification Exemption – Boat Manufacture

WAC 173-401-615(3) – 10/17/2002
ADP 07-2745 Condition 52 – 10/25/2007

For each boat manufacture production resin that must meet either a military specification or approved by the U.S. Coast Guard for use under 46 CFR Subchapter Q or 46 CFR Subchapter T, the Permittee shall submit to SWCAA at least seven (7) days prior to the date of intended use, the records from Condition 33.

R9. Military Specification Exemption – FRP Manufacture

WAC 173-401-615(3) – 10/17/2002
ADP 07-2745 Condition 54 – 10/25/2007

For each FRP manufacture production resin that must meet a military specification, the Permittee shall submit to SWCAA at least seven (7) days prior to the date of intended use, the records from Condition 42.

X. NON-APPLICABLE REQUIREMENTS

The following table lists all federal, state, and/or local requirements which might reasonably apply to the Permittee, but are deemed nonapplicable as per WAC 173-401-640(2) (6/17/1994) after review by SWCAA.

Registration program

WAC 173-400-099 – 2/10/2005 State Only
SWCAA 400-100 – 12/14/2006 Local Only

The Permittee is an air operating permit source. Pursuant to WAC 173-400-101(7), air operating permit sources are exempt from the registration program established under WAC 173-400-099, and implemented in accordance with WAC 173-400-100 through WAC 173-400-104. Pursuant to SWCAA 400-100(3)(a)(iv) air operating permit sources are exempt from the registration requirements of SWCAA 400-100(2).

NESHAP for Surface Coating of Plastic Parts and Products

40 CFR Subpart PPPP [§63.4480] – 4/19/2004

The Permittee is specifically exempted from 40 CFR 63 Subpart PPPP as per §63.4481(c)(6).

APPENDIX A – VISIBLE EMISSIONS EVALUATION METHOD

1. Principle

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

2. Procedure

The observer must be certified in accordance with the provisions of Section 3 of 40 CFR Part 60, Appendix A, Method 9, as in effect on July 1, 2002.

2.1 Position

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

2.2. Field Records

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

2.3. Observations

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

2.3.1. Attached Steam Plumes

When condensed water vapor is present within the plume as it emerges from the emission outlet, opacity observations shall be made beyond the point in the plume at

which condensed water vapor is no longer visible. The observer shall record the approximate distance from the emission outlet to the point in the plume at which the observations are made.

2.3.2. Detached Steam Plumes

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

2.4. Recording Observations

Opacity observations shall be recorded to the nearest 5% at 15 second intervals on a field data sheet. A minimum of 24 observations shall be recorded. Each momentary observation recorded shall be deemed to represent the average opacity of emissions for a 15 second period.

2.5. Data Reduction

The number of observations at each opacity level shall be determined and recorded on the field data sheet. Opacity shall be determined by the highest 13 observations in any consecutive 60-minute period. The opacity standard or emissions limit is exceeded if there are more than 12 observations during any consecutive 60 minute period for which an opacity greater than the standard or emission limit is recorded. The opacity standard is a one hour standard (rolling 60 minutes). Only one violation of the standard per hour may be recorded meaning that a violation for any given consecutive 60 minute period may be recorded in substantially fewer than 60 minutes. No one hour time sets shall overlap for purpose of determining a violation or violations. Data used to establish a violation in one consecutive 60 minute period can not be used to establish a violation in a second consecutive 60 minute period.

3. References

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

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

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